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COMMITTEE ON OVERSIGHT AND GOVERNMENT REFORM,
U.S. HOUSE OF REPRESENTATIVES,
WASHINGTON, D.C.

INTERVIEW OF: TOVA NOEL

Monday, May 18, 2026

Washington, D.C.

The interview in the above matter was held in room 2247, Rayburn House Office Building,
commencing at 10:00 a.m.

Present: Representatives Khanna, Stansbury, Subramanyam, and Walkinshaw.

1 Appearances:

2

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4 For the COMMITTEE ON OVERSIGHT AND GOVERNMENT REFORM:

5

6 DANIEL ASHWORTH, GENERAL COUNSEL

7 BRITTANY BRIGNAC, SENIOR COUNSEL

8 HANNAH CATHEY, PROFESSIONAL STAFF MEMBER

9 MALLORY COGAR, CHIEF CLERK AND DEPUTY DIRECTOR OF OPERATIONS

10 JACK EMMER, CHIEF COUNSEL FOR INVESTIGATIONS

11 EMILY FEYERABEND, COUNSEL

12 RYAN GIACHETTI, CHIEF COUNSEL

13 BILLY GRANT, DEPUTY CHIEF COUNSEL FOR INVESTIGATIONS

14 WILL HARNICE, PROFESSIONAL STAFF MEMBER

15 PETER SPECTRE, DEPUTY DIRECTOR FOR OVERSIGHT

16 ELLISON TOLAN, COUNSEL

17 ASHLEE VINYARD, DEPUTY STAFF DIRECTOR

18 [REDACTED], MINORITY DEPUTY STAFF DIRECTOR

19 [REDACTED], MINORITY STAFF DIRECTOR

20 [REDACTED] MINORITY RESEARCH ASSISTANT

21 [REDACTED], MINORITY RESEARCH ANALYST

22 [REDACTED], MINORITY SENIOR COUNSEL

23 [REDACTED], MINORITY SENIOR COUNSEL

24 [REDACTED], MINORITY SENIOR COUNSEL

25 [REDACTED] MINORITY PROFESSIONAL STAFF MEMBER

1 [REDACTED], MINORITY FELLOW

2 [REDACTED], MINORITY SENIOR ADVISOR

3 [REDACTED] MINORITY CHIEF COUNSEL

4

5

6

7

8 For TOVA NOEL:

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10 JASON E. FOY, ESQ.

11 Foy & Sepowitz, LLC

12 24 Bergen Street, Ste. #200

13 Hackensack, NJ 07601

14

15 RUDY BRIOCHÉ, ESQ.

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2 Ms. Feyerabend. This is a transcribed interview of Tova Noel, conducted by the House
3 Committee on Oversight and Government Reform under the authority granted to it pursuant to
4 House rule X. Accordingly, House rule X grants the Committee broad jurisdiction for the Committee
5 to conduct investigations of any matter at any time.

6 This interview was requested by Chairman James Comer as part of the Committee's
7 investigation into the circumstances and subsequent investigations into the crimes of Jeffrey Epstein
8 and Ghislaine Maxwell, the operation of sex-trafficking rings and ways for the Federal Government to
9 effectively combat them, the ways in which Mr. Epstein and Ms. Maxwell sought to curry favor and
10 exercise influence to protect their illegal activities, and potential violations of ethics rules related to
11 elected officials.

12 Can the witness please state her name and spell her last name for the record?

13 Ms. Noel. Tova Noel, N-o-e-l.

14 Ms. Feyerabend. Thank you.

15 Ms. Noel. You're welcome.

16 Ms. Feyerabend. I want to thank Ms. Noel for appearing here voluntarily today.

17 My name is Emily Feyerabend, and I am counsel for Chairman James Comer.

18 Under the Committee on Oversight and Government Reform's rules, you are allowed to have
19 counsel present to advise you during this interview. Do you have counsel representing you in a
20 personal capacity present with you today?

21 Ms. Noel. Yes.

22 Ms. Feyerabend. Will counsel please identify themselves for the record?

23 Mr. Foy. Jason Foy.

24 Mr. Brioche. Rudy Brioche.

25 Ms. Feyerabend. Thank you.

1 And for the record, starting with the majority staff, can the additional staff members please
2 introduce themselves with their name, title, and affiliation?

3 Mr. Grant. Billy Grant, deputy chief counsel for investigations, Chairman Comer.

4 Mr. Emmer. Jack Emmer, chief counsel for investigations for Chairman Comer.

5 Mr. Ashworth. Daniel Ashworth, general counsel for Chairman Comer.

6 Mr. Giachetti. Ryan Giachetti, chief counsel for Chairman Comer.

7 Mr. Harnice. Will Harnice, professional staff member for Chairman Comer.

8 Ms. Cathey. Hannah Cathey, professional staff member, Chairman Comer.

9 Ms. Tolan. Ellison Tolan, counsel, Chairman Comer.

10 Ms. Brignac. Brittany Brignac, senior counsel for Chairman Comer.

11 Ms. Vineyard. Ashlee Vinyard, deputy staff director for Chairman Comer.

12 Mr. Spectre. Peter Spectre, director of oversight for Chairman Comer.

13 Ms. Cogar. Mallory Cogar, director of operations and chief clerk for Chairman Comer.

14 ██████████ ██████████, chief counsel, Ranking Member Garcia.

15 ██████████ ██████████, senior counsel, Ranking Member Garcia.

16 ██████████ ██████████, senior counsel, Ranking Member Garcia.

17 ██████████ ██████████, senior counsel, Ranking Member Garcia.

18 ██████████ ██████████, research assistant, Ranking Member Garcia.

19 ██████████ ██████████, research analyst, Ranking Member Garcia.

20 ██████████ ██████████, deputy staff director for Ranking Member Garcia.

21 ██████████ ██████████, professional staff member for Ranking Member Garcia.

22 ██████████ ██████████, fellow, Ranking Member Garcia.

23 Ms. Feyerabend. Thank you all.

24 And I also see we have a member that has joined us. Would he please identify himself?

25 Mr. Walkinshaw. Good morning. I am James Walkinshaw from Virginia's 11th District.

1 Ms. Feyerabend. Thank you.

2 Ms. Noel, before we begin, I'd like to go over the ground rules for this transcribed interview.

3 The questioning will proceed in rounds. The majority will ask questions for up to an hour,
4 and then the minority will have the opportunity to ask questions for up to an hour if they choose.

5 To the extent members have questions for the witness, they will be propounded during their
6 side's respective rounds.

7 The clock will stop if you need to confer with counsel, your counsel is speaking, and when
8 members or staff are speaking during the opposing side's round of questions.

9 We will alternate back and forth until there are no more questions.

10 Do you understand?

11 Ms. Noel. Yes, ma'am.

12 Ms. Feyerabend. There is a court reporter taking down everything I say and everything you
13 say to make a written record of the interview.

14 For the record to be clear, please wait until the staffer questioning you finishes each question
15 before you begin your answer, and the staffer will wait until you finish your response before
16 proceeding to the next question.

17 Further, to ensure the court reporter can properly record this interview, please speak clearly,
18 concisely, and slowly. Also, the court reporter cannot record nonverbal answers, such as nodding
19 or shaking your head, so it's important that you answer each question with an audible, verbal
20 answer.

21 Exhibits may be entered into the record. Majority exhibits will be identified numerically;
22 minority exhibits will be identified alphabetically.

23 Do you understand?

24 Ms. Noel. Yes, ma'am.

25 Ms. Feyerabend. We want you to answer our questions in the most complete and

1 truthful manner possible, so we will take our time.

2 If you have any questions or do not fully understand a question, please let us know. We will
3 attempt to clarify, add context to, or rephrase our questions.

4 If we ask about specific conversations or events in the past and you are unable to recall the
5 exact words or details, you should testify to the substance of those conversations or events to the
6 best of your recollection.

7 If you recall only a part of a conversation or event, you should give us your best recollection
8 of those events or parts of conversations that you do recall.

9 Do you understand?

10 Ms. Nova. Yes, ma'am.

11 Ms. Feyerabend. Although you are here voluntarily and you will not be sworn in, you are
12 required by law pursuant to Title 18 of United States Code, section 1001, to answer questions from
13 Congress truthfully. This also applies to questions posed by congressional staff in this interview.

14 Do you understand?

15 Ms. Noel. Yes, ma'am.

16 Ms. Feyerabend. If at any time you knowingly make false statements, you could be subject
17 to criminal prosecution. Do you understand?

18 Ms. Noel. Yes, ma'am.

19 Ms. Feyerabend. This includes both knowingly providing false testimony but also stating
20 that you do not recall or remember something when, in fact, you do. Do you understand?

21 Ms. Noel. Yes, ma'am.

22 Ms. Feyerabend. Furthermore, you cannot tell half-truths or exclude information necessary
23 to make your statements accurate. You are required to provide all information that would make
24 your response truthful. A deliberate failure to disclose information can constitute a false
25 statement.

1 Do you understand?

2 Ms. Noel. Yes, ma'am.

3 Ms. Feyerabend. Is there any reason that you are unable to provide truthful testimony in
4 today's interview?

5 Ms. Noel. No, ma'am.

6 Ms. Feyerabend. Please note that if you wish to assert a privilege over any statement today,
7 that assertion must comply with the rules of the Committee on Oversight and Government Reform.

8 Pursuant to that, Committee rule 16(c)(1) states, "For the Chair to consider assertions of
9 privilege over testimony or statements, witnesses or entities must clearly state the specific privilege
10 being asserted and the reason for the assertion on or before the scheduled date of testimony or
11 appearance."

12 Do you understand?

13 Ms. Noel. Yes, ma'am.

14 Ms. Feyerabend. Ordinarily, we take a 5-minute break at the end of each hour of
15 questioning, but if you need a longer break or a break before that, please let us know, and we will be
16 happy to accommodate.

17 However, to the extent that there is a pending question, we would ask that you finish
18 answering the question before we take the break.

19 Do you understand?

20 Ms. Noel. Yes, ma'am.

21 Ms. Feyerabend. Do you have any other questions before we begin?

22 Ms. Noel. No, ma'am.

23 Ms. Feyerabend. I understand you have an opening statement. Would you like to read
24 that now?

25 Ms. Noel. Yes.

1 Good morning. My name is Tova Noel, and I'm 37 years old. I appear here today
2 voluntarily in response to the request of the House Oversight Committee to answer questions about
3 the circumstances and subsequent investigation of the death of Mr. Jeffrey Epstein in 2019.

4 Before I begin my opening statement, I would like to take a moment to say that my thoughts
5 and prayers are with the victims of Jeffrey Epstein and that my decision to voluntarily appear before
6 this committee, in part, is influenced by my desire to provide clarity for the women harmed by Mr.
7 Epstein and his co-conspirators.

8 I emigrated from Antigua to the United States when I was 12 years old. At age 16, I
9 graduated high school in Pennsylvania. When I turned 17, I attempted to enlist in the United States
10 Army but was unable to do so. I was a minor, and my mother refused to consent to my enlistment.

11 When I turned 19 years old, I enlisted and served in the Army National Guard for 6 years,
12 receiving an honorable discharge in 2014. During my military service, I was deployed during
13 Operation Enduring Freedom and stationed in Kuwait.

14 While serving our country, I became a U.S. citizen in 2009.

15 During my final year in the Army, I finished college-level courses and earned an Associate of
16 Applied Science degree in criminal justice in 2014. I went back to school to earn a bachelor's degree
17 in criminal justice from John Jay College in 2017.

18 After I earned my bachelor's degree, I briefly worked at the United States Postal Service until
19 the opportunity to work as a Federal correctional officer for the Federal Bureau of Prisons. I
20 decided to pursue the role because it was in the criminal justice field.

21 On June 24th, 2018, I began working for the Federal Bureau of Prisons. I was assigned to the
22 Metropolitan Correctional Center, also known as MCC, in Manhattan.

23 Around March 2019, during my first year as a Federal correctional officer, I sustained an injury
24 on the job. While on leave, I missed training classes that were required to be assigned to the
25 Special Housing Unit, also known as the SHU. These training courses were specifically related to the

1 duties and responsibilities to work in the SHU.

2 When I returned to work in June 2019, I was assigned to work in the SHU even though I never
3 received the required specialized training. Prior to June 2019, I never worked in the SHU.

4 When I was assigned to the SHU, I was instructed to sign a document that indicated that I
5 received the SHU training. When I advised my supervisor that I did not receive the training, I was
6 told not to worry about it. I was instructed to sign so that the facility could pass its program review.

7 When I was placed in the SHU, I was assigned to the 4:00-p.m.-to-midnight shift most of the
8 time. Due to understaffing issues, my colleagues and I were required to work overtime on a regular
9 basis. To avoid being mandated to work a second consecutive shift at midnight, I often would
10 volunteer to work the 8:00-a.m.-to-4:00-p.m. shift and then work my regular shift from 4:00 to
11 midnight.

12 When Mr. Epstein was lodged at the MCC on or about July 6th, 2019, I did not know who he
13 was or anything about his past. I had limited interactions with Mr. Epstein because he spent most
14 of each day downstairs in the attorney conference room.

15 I was not aware of the public's interest in Mr. Epstein until shortly after the July 23rd, 2019,
16 incident when he was placed on suicide watch. I was not working the shift when the July 23rd
17 incident occurred.

18 On August 9th, 2019, I was scheduled to work my 4:00-p.m.-to-midnight shift. Because I had
19 a personal obligation that day, I could not work the 8:00-a.m.-to-4:00-p.m. shift. As a result, I was
20 mandated to work the August 10th, 2019, midnight-to-8:00-a.m. shift.

21 It was also my first time I worked in the SHU with Officer Michael Thomas. It was my
22 understanding that Officer Thomas was working the midnight shift in addition to working his
23 assigned 8:00-a.m.-to-4:00-p.m. shift.

24 On August 9th and 10th, 2019, I acknowledge with full candor that I did not execute the
25 counts and rounds properly. I admit that there were tasks that I failed to complete, which resulted

1 in the improper execution and inaccurate documentation of the counts and rounds.

2 The failure to execute my duties and responsibilities properly and the submission of
3 inaccurate documentation were not related to Mr. Epstein or his death in any way.

4 The inaccurate documentation were executed at the beginning of each shift and were not
5 done to cover up my conduct or the conduct of my colleague.

6 At the time, I considered what I was doing as the "MCC way." I use the term "MCC way"
7 because it is a phrase I heard countless times from multiple colleagues while learning on the job prior
8 to being assigned to the SHU.

9 In other words, I was trained in a way that suggested that the policy guidance and operation
10 protocols set forth in writing by the Federal Bureau of Prisons may be applied differently at MCC.
11 My conduct regarding documentation and execution of the counts and rounds was based on what I
12 observed experienced officers doing.

13 Because I believed that the video surveillance cameras inside of MCC were working properly, I
14 was not attempting to get away with something that I believed to be a crime. It was a surprise to
15 me to learn months later the video surveillance system was not working properly.

16 Again, my failure to complete those duties were not because of Mr. Epstein. My inadequate
17 job performance was due to my inexperience, inadequate training, and being overworked. Due to
18 understaffing issues, the amount of overtime I was required to do resulted in me earning my full base
19 salary in approximately 6 months' time on the job.

20 As a result, my inadequate performance on the SHU on August 9th and 10th of 2019 was
21 based on the dysfunctional culture at MCC, which has been well-documented in multiple reports
22 issued by the Department of Justice Office of the Inspector General.

23 My responsibility to conduct counts and rounds was improperly executed because of severe
24 understaffing, a lack of adequate training, inadequate communication between management and
25 frontline correctional officers, and other systemic failures.

1 The systemic failures at the MCC were documented by the Office of Inspector General and
2 multiple journalists long before the death of Mr. Epstein. The systemic failures were communicated
3 to the Federal Bureau of Prison's leadership by the correctional officers' union leadership long before
4 Mr. Epstein's death.

5 The only connection I have to the death of Mr. Epstein is that I happened to be mandated for
6 overtime when he died.

7 My life has drastically changed since August 10th, 2019. Since that day, my life has been
8 extremely difficult. This situation has been one of the hardest things I have experienced in my life.

9 For over 2 years, my freedom was in jeopardy. After the case against me was dismissed in
10 2021, with the unwavering support of my family, friends, coworkers, my attorney Jason Foy, and
11 God, I thought that I would be able to privately rebuild my life and career. Instead, I have
12 consistently been the subject of threats to my life, conspiracy theories, and outrageous rumors,
13 impacting my mental and physical health.

14 I have received threats from strangers. I have witnessed strangers pontificate about
15 whether I'm a murderer or that I'll end up dead. I am consistently harassed at my residence, place
16 of employment, in emails, and on the phone. Every few weeks, there's a new article based on a
17 new theory with little to no factual basis.

18 When Congress passed the Epstein Files Transparency Act, my personal identification
19 information was released to the public without proper redaction of my date of birth and other
20 personal information.

21 And now I have been asked to come before you to speak for the first time publicly and answer
22 your questions related to the investigation and death of Mr. Epstein.

23 My goal today is to be honestly -- my goal today is to honestly answer the Committee's
24 questions to the best of my recollection and finally put this behind me permanently.

25 I would like to ask the world to allow me to heal and move on with my life. I'm not a

1 criminal. I didn't conspire to cause Mr. Epstein's death. It is my desire to be left alone after all of
2 today's interview.

3 Thank you.

4 Ms. Feyerabend. Thank you.

5 I see we have another Member of Congress. Would he please identify himself for the
6 record?

7 Mr. Subramanyam. Representative Suhas Subramanyam, Virginia's 10th District.

8 Ms. Feyerabend. Thank you.

9 All right. My time reads 10:18, and the majority's time will begin now.

10 EXAMINATION

11 BY MS. FEYERABEND:

12 Q Ms. Noel, thank you again for appearing here voluntarily today.

13 I'd like to start this interview by discussing more about your background. I know you
14 mentioned it in your opening statement, but where are you from originally?

15 A Antigua.

16 Q Antigua. And when did you first move to New York?

17 A I first moved to New York about -- I first moved New York, I want to say, about 2011.

18 Q What made you decide to move there?

19 A When I came to this country, I first lived in Pennsylvania. And after I graduated high
20 school, I moved to New York because I liked New York better than Pennsylvania.

21 Q Can -- I know you just did so, but can you briefly again for the record walk us through
22 your professional career?

23 A I graduated high school at 16, went on to the military. When I turned 19, I gained an
24 associate's degree in criminal justice. I went on to gaining a bachelor's degree also in criminal
25 justice and a minor in law.

1 I completed 6 years in the military, one tour in Kuwait. I worked for the United States Postal
2 Service and then, later on, went on to working for the Federal Bureau of Prisons, along with other
3 employment.

4 Q When did you begin working at the Metropolitan Correctional Center in New York City?

5 A June 2018.

6 Q You mentioned your job right before then was working for the U.S. Postal Service?

7 A Correct.

8 Q Okay. What years did you work at MCC?

9 A 2018 -- June 2018 to August 10th, 2019.

10 Q How was it that you ended up working at MCC?

11 A While working at the United States Postal Service, I received a call from MCC to gain
12 employment there, and I accepted.

13 Q So someone reached out to you?

14 A Correct.

15 Q Okay. And why did you make that decision to start working there?

16 A Because I had the background in criminal justice, and I wanted to pursue my degree
17 field.

18 Q What was your first role or position at MCC?

19 A Correctional officer.

20 Q Were you ever assigned to more than one role while at MCC?

21 A No, ma'am.

22 Q Can you describe what your responsibilities were in that role?

23 A My role as a correctional officer was to oversee inmates to make sure that they're
24 performing their daily tasks and the functions and to make sure that they're accounted for.

25 Q And at what point were you assigned to the Special Housing Unit?

1 A I was assigned to the Special Housing Unit in June of 2019.

2 Q And for purposes of the record, I'm going to be referring to the Special Housing Unit as
3 the "SHU," spelled S-H-U.

4 Who first told you that you were going to be assigned to the SHU?

5 A I don't recall exactly who told me that I was going to be assigned to the SHU.

6 Q Okay. Were you ever told why you were being moved to the SHU?

7 A So, based on seniority, you get to bid for your post, and the only post that was left was
8 the SHU.

9 Q How did you feel about being moved the SHU at the time?

10 A I didn't want to go to SHU, because I wasn't familiar with working SHU. When I
11 shadowed, I shadowed on regular housing units, not SHU.

12 Q Okay.

13 Ms. Feyerabend. We have a new staff member that's entered the room. Will he please
14 identify himself?

15 Mr. Edmonson. Robert Edmonson, staff director, Ranking Member Garcia.

16 Ms. Feyerabend. Thank you.

17 BY MS. FEYERABEND:

18 Q Was working in the SHU considered a promotion to the rest of the staff at MCC?

19 A No.

20 Q Why not?

21 A Because it was a housing unit.

22 Q Okay. So there was no difference between a correctional officer working the SHU or
23 any other area at MCC?

24 A Correct.

25 Q Okay. What was your salary while working in the SHU?

1 A I don't recall exactly.

2 Q Okay.

3 You worked at MCC for over a year.

4 A Yes.

5 Q Was that your only job during that entire time, or did you have any additional sources of
6 income outside of your salary?

7 A Additional sources of income was VA benefits.

8 Q Were you receiving those the entire time?

9 A Yes.

10 BY MR. EMMER:

11 Q In your opening, you referenced -- was it a workplace injury that --

12 A Correct.

13 Q When did that occur?

14 A March.

15 Q March of 2018?

16 A Correct -- no. March of 2019.

17 Q Excuse me. Thank you. And then when did you return --

18 A To work?

19 Q -- back to work?

20 A June of 2019.

21 Q Thank you.

22 BY MS. FEYERABEND:

23 Q So we're going to discuss Mr. Epstein's death and that night more specifically in a little
24 bit, but I'd like to first get a better sense of the structure and the staffing roles at the MCC.

25 A Okay.

1 Q So you mentioned that you were first assigned in June 2019 to the SHU. Can you
2 describe how the SHU specifically differs from other units at MCC?

3 A So, for a regular housing unit, the inmates are let out and they can move around,
4 whereas in the SHU, you're locked in for 23 hours and you're only out for 1 hour, and it's a more
5 secure area. The only inmates that's out would be, like, the orderlies.

6 Q What are those?

7 A The orderlies are inmates that are considered to have privileges. They're allowed to,
8 like, come out to clean or the law library.

9 Q Okay.

10 I know you touched on this in your opening statement, but was there any special training that
11 you had to undergo in order to be assigned to the SHU?

12 A Yes.

13 Q And did you complete the special training that was required?

14 A No.

15 Q Why not?

16 A Because I was out on an injury.

17 Q You mentioned, going back one question, that there were orderlies in the SHU. Was
18 Mr. Epstein considered an orderly?

19 A No.

20 Q Why not?

21 A I don't make the decision on who becomes an orderly. I don't know.

22 Q Okay. Do you know how it was decided?

23 A Of who becomes an orderly? No, I don't know.

24 Q Okay.

25 Back to the special training, were you ever directed by supervisors to say that you had

1 completed the training --

2 A Yes.

3 Q -- when you had not? Can you provide more details about what happened there?

4 A When I came back from the injury, I was told to report to the supervisor. When I went
5 to her, she asked me to sign the training log to say that I completed the SHU training, because that
6 was my assigned post at the time.

7 So I informed her that but I didn't complete the training. She told me not to worry about it,
8 to just sign it, because they need to pass program review.

9 Q Do you know if there were other correctional officers that she told the same thing to?

10 A I don't know.

11 Mr. Foy. May I have a word real quick?

12 Ms. Feyerabend. We can go off the record.

13 [Discussion off the record.]

14 Ms. Feyerabend. We can go back on the record.

15 Ms. Noel. Oh, and when she asked me to sign, she also asked me not to date it.

16 Ms. Feyerabend. Why was that?

17 Ms. Noel. I guess because the date where I was signing would've not -- would've conflicted
18 with the time that the training actually took place.

19 Mr. Grant. And who was the supervisor? What was the supervisor's name?

20 Ms. Noel. Kimberly Shivers.

21 BY MS. FEYERABEND:

22 Q Do you have any idea whether that was an ordinary practice by supervisors for the SHU?

23 A I don't know.

24 Q Understanding that you did not complete the training, did you know what the training
25 entailed?

1 A No.

2 Q Okay. Did you ever hear anybody talk about the training?

3 A No.

4 Q When you were in the SHU, what was the breakdown of your team?

5 A Like, how many people?

6 Q Sure. How many total people on staff in the SHU.

7 A So the SHU had myself and two other correctional officers on the 4:00-p.m.-to-midnight
8 shift. On the 12:00-p.m.-to-8:00-a.m. shift, it was two people.

9 Q Did you have people working over you?

10 A Could you clarify?

11 Q Sure. When you were on shift, did you have any supervisors that were also working at
12 that time?

13 A Yes.

14 Q Okay. How many of those were there?

15 A The supervisor would be considered the lieutenants. So there's about, I want to say,
16 four or five lieutenants, all not on at the same time but rotating their shifts.

17 Q Okay. So when you were on shift from the 4:00-p.m.-to-midnight shift, it would be
18 you, one other correctional officer, and one to four lieutenants?

19 A No. So, on shift 4:00 to midnight, it would be me and two correctional officers in the
20 SHU. In the building, it would be the lieutenants downstairs in the lieutenants' office, about two or
21 three, maybe, on a shift.

22 Q Okay.

23 Going back to the training, were you ever told to complete the training after you started
24 working in the SHU?

25 A For SHU training, no.

1 Q Okay. So you signed and then began working.

2 A Correct.

3 Q Okay. Thank you.

4 Did you know if the number of people on staff in the SHU was typical, or were you guys
5 understaffed?

6 A We were understaffed.

7 Q How understaffed would you say?

8 A It's supposed to be four people, not three, but it was three.

9 Q Okay. What kinds of problems or issues did that cause, the understaffing?

10 A A lot of mandated overtime.

11 Q So the overtime hours were not voluntary.

12 A No.

13 Q Okay.

14 A Can I clarify that?

15 Q Sure.

16 A The overtime is not voluntary, it's mandated, but we volunteer because, when you
17 volunteer, you get to pick your post versus, when they mandate you, they put you where they want
18 you to go.

19 So, because we know we're going to get mandated, we volunteer on the front end, like I
20 explained in my opening statement, versus getting hit with mandation on the back end to where they
21 need you to go.

22 Q Who was instituting the mandatory overtime hours?

23 A On that day, Lieutenant Cannata.

24 Q And how often would you or other correctional officers in the SHU have to work
25 overtime?

1 A Every day.

2 Q How many shifts would you work a week?

3 A Five days of double shifts, but on your last day, you can't be mandated, so it'd be 4.

4 Q Was every shift that you worked -- did that include an overtime shift?

5 A Yes.

6 Q So 8 hours, plus --

7 A Another 8.

8 Q So 16-hour total shifts.

9 A Correct.

10 Q What were your shifts like while you were working in the SHU?

11 A My shift was 4:00 to midnight, and I had 1 day where it was a 2:00 to 10:00.

12 Q How would you describe working a shift in the SHU?

13 A When you come in for your shift at 4 o'clock, counts are being done, and immediately
14 after that, you're getting ready to feed inmates.

15 And after that, I kind of always wait on the directive from the senior officer that I'm working
16 with, because I don't really know how to work the SHU. So whatever they ask me or tell me to do.
17 I kind of lean on the senior person.

18 Q Was Officer Michael Thomas -- was he a senior officer?

19 A Yes.

20 Q Okay.

21 On a typical shift, you said you would feed the inmates. Were there any other
22 responsibilities that you had on every shift?

23 A Giving out toiletries -- for example, toilet paper; rounds.

24 Q Were those responsibilities expected of you on every shift, or did they differ?

25 A In the SHU, yes.

1 Q Okay. Did they differ by the time of day or the hour of shifts that you're working?

2 A No.

3 Q Would you always complete all of your duties?

4 A To the best of my recollection, not all the time.

5 Q Okay. Why not?

6 A Because sometimes we don't have enough people, so, depending on the task, it
7 probably can't get done because there is not enough people to get it done. Or sometimes it is
8 enough people, but because they're tired, it doesn't get done correctly.

9 Mr. Emmer. Did you prioritize which tasks were most important when you decided -- or
10 when some certain tasks weren't completed?

11 Ms. Noel. No. I just kind of went with the flow of whoever I was working with at the time.

12 BY MS. FEYERABEND:

13 Q You mentioned that you worked with a senior officer and then there were also people
14 above you while you were on shift. Did you have a good relationship with those people that you
15 worked with?

16 A Yes.

17 Q Have you ever had any issues with any of your colleagues?

18 A No.

19 Q Would anyone else ever instruct you on how to do your role while in the SHU?

20 A No.

21 Q What kind of authority did you have to make decisions?

22 A I would say I didn't have authority to make decisions. I was just a correctional officer.

23 Q Okay.

24 Ms. Feyerabend. I believe we have another member that's entered.

25 Would you please introduce yourself for the record?

1 Ms. Stansbury. Good morning. I'm Melanie Stansbury. I represent New Mexico's First
2 Congressional District.

3 Ms. Feyerabend. Thank you.

4 BY MS. FEYERABEND:

5 Q While you were in the SHU, what cell blocks or areas were you responsible for
6 overseeing?

7 A All of them.

8 Q Okay. How many cell blocks total were in the SHU?

9 A Six.

10 Q Who can access the SHU?

11 A From the outside?

12 Q Uh-huh.

13 A Anyone can access the SHU from the outside if Control pops the door and lets you in.

14 Q By "everyone," do you mean MCC staff?

15 A Correct.

16 Q Okay. So it's not closed off to SHU-only employees?

17 A Correct.

18 Q Okay.

19 Could you walk us through the procedures required for conducting cell checks as an officer in
20 the SHU?

21 A A cell check?

22 Q Like, rounds, doing your rounds.

23 A Okay.

24 So, during the rounds, there is an officer that opens the grille, which is the door of the tier,
25 and then the other officer goes down and checks on every single person and come around, check on

1 every single person, and exit.

2 Q When you say "check on every person" --

3 A Seeing an alive, breathing body.

4 Q Would that require you to enter the cell?

5 A No.

6 Q Okay. Would you look through a window?

7 A A window.

8 Q Would you talk to them?

9 A Sometimes.

10 Q Okay.

11 Can you describe how would you access the SHU when you would start your shift?

12 A When I get to the door, Control has to let me in the first door. Then, when you come
13 through that door, there's a second door, and the officer on the inside has to let you in the second
14 door.

15 Q So would you say that's two layers of security --

16 A Correct.

17 Q -- to be able to get in?

18 Would you have to scan in? Did you have a badge or anything like that?

19 A No.

20 Q I understand MCC is a high-rise building.

21 A Correct.

22 Q Would you go up an elevator to get up to the SHU?

23 A Correct.

24 Q Okay. What floor was the SHU on?

25 A Ninth floor.

1 Q Out of how many?

2 A Ten.

3 Q Do you think there was any reason why it was as high up as it was?

4 A I don't know.

5 Q Okay.

6 Could you explain to us the layout of the SHU block, or the SHU unit, at the MCC?

7 A So, when you enter the SHU and you walk towards the center, the common area, there's
8 a desk with computers.

9 Before the desk, there are two tiers, up and down. Then, to the, if you're facing the desk,
10 left, in the middle there's two more tiers, up and down. And then off to the far left, there's the last
11 two tiers, up and down.

12 So it's really like a circle. It's, like, the desk and then the two tiers, two tiers, two tiers.

13 And then, going up the last set of tiers, you could go up to the 10 South wing.

14 Q So does that make it two or three tiers total?

15 A Well, 10 South is technically not connected. So, in SHU, it is still 6. But you can
16 access the door there to go to 10 South, which is another unit.

17 Q Okay. That's not included in the SHU?

18 A Correct.

19 Q How many inmates are typically housed in the SHU?

20 A SHU, it varies, because SHU doesn't have to be full, because people are placed in the
21 SHU for different reasons. So it could be any number.

22 Q Why would inmates go to the SHU?

23 A Some inmates go to the SHU for disciplinary segregation. Some inmates go because
24 they have to be separated. Some, because they're high-profile.

25 Q Would they ever go for mental-health reasons?

1 A I am not sure.

2 Q How long did inmates typically stay in the SHU?

3 A I don't know.

4 Q You mentioned some inmates would go to the SHU for disciplinary reasons, some would
5 go for the fact that they were high-profile. Why was Mr. Epstein sent to the SHU?

6 A Mr. Epstein was in the SHU because he was a high-profile inmate.

7 Q And not because of his mental-health issues at the time?

8 A Correct.

9 Q Okay.

10 Is there any reason why SHU inmates would be assigned to a cell in the upper tier versus the
11 lower tier?

12 A No.

13 Q So, like, a high-profile inmate wouldn't go to an upper tier versus a lower tier?

14 A No.

15 Q Okay.

16 Where was Mr. Epstein's cell located within the SHU unit?

17 A As soon as you enter the SHU, the first two tiers, he was on the top tier, the first door to
18 your right.

19 Q Do you know the name of the staircase that he would've been next to?

20 A I can't remember. I --

21 Q Okay. Does L tier --

22 A I was gonna say, I think it's L.

23 Q -- trigger your recollection?

24 Where was Mr. Epstein's cell in relation to your station?

25 A So the cell block, when you go up the stairs, the desk is, like, right off to the left. As far

1 as feet, I don't know.

2 Q Was your station on the same level as Mr. Epstein's cell?

3 A No. So he would've been up the stairs, and the desk would've been on the ground.

4 Q Could you estimate about how long it would take for you to walk to his cell?

5 A Oh, to walk? Like, 2 minutes.

6 Q I know you mentioned him previously, but who is Officer Michael Thomas?

7 A Officer Michael Thomas is the materials handler officer that worked with me on

8 August 10th, 2019, from midnight to 8:00 in the morning.

9 Q And he -- did he work the 4:00-p.m.-to-midnight shift on August 9th?

10 A No.

11 Q Who worked that shift with you?

12 A Davis and Bonhomme (ph).

13 Q How long had you and Officer Thomas worked together in the SHU?

14 A That was my first time working with Officer Thomas.

15 Q It doesn't seem like there were that many correctional officers working in the SHU.

16 Was it just happenstance, happenchance, that you --

17 A Worked with him?

18 Q Yeah.

19 A Uh-huh.

20 Q Okay. Had you worked together with him in any other MCC unit?

21 A No, we never worked any units before.

22 Q You mentioned he was a senior correctional officer.

23 A Yes.

24 Q Would that make him technically your supervisor?

25 A So he wouldn't be my supervisor. He was a correctional officer before, and then he

1 got promoted to materials handler, but not making him my supervisor.

2 Q So you both had authority to make your decisions --

3 A Yes.

4 Q -- while on shift?

5 A Yes.

6 Q Okay.

7 Did you consider him -- I know you said you only worked one shift with him, but in that time,
8 did you consider him to be a good employee?

9 A No.

10 Q Why not?

11 A Because he was tired.

12 Q From working long shifts?

13 A Correct.

14 Q Overtime shifts?

15 A Overtime.

16 Q Mandated overtime shifts?

17 A Yes.

18 Q Did you and Mr. Thomas have a good working relationship?

19 A That was actually my first time working with him, so I would say we didn't have any
20 relationship.

21 Q Okay. Had y'all spoken -- or did y'all speak during your shift?

22 A Yes.

23 Q Do you remember what you discussed?

24 A I went to him to conduct the count, and he expressed to me that he was tired.

25 Q So, because he was tired, he wouldn't --

1 A Correct.

2 Q -- do the count?

3 A Correct.

4 Q What was your response to that?

5 A "Okay."

6 Q So did you, in fact, do the count by yourself?

7 A At 10:00.

8 Q Okay.

9 A Improperly.

10 [Discussion off the record.]

11 Ms. Noel. Just to clarify, Thomas got on at 12:00. That count that I did at 10:00 wouldn't
12 have been when he was there. When he was there, I didn't do any.

13 Ms. Feyerabend. When did you leave MCC?

14 Ms. Noel. August 10th.

15 Mr. Grant. You mentioned that you did the 10:00 p.m. count improperly. What about that
16 made it improper?

17 Ms. Noel. Because I did it by myself, and a count is supposed to be conducted with two
18 people.

19 Mr. Grant. Thank you.

20 Ms. Noel. You're welcome.

21 BY MS. FEYERABEND:

22 Q So you left August 10th, 2019. Why did you leave?

23 A That was the morning my shift was over at 8:00 a.m.

24 Q Okay. Were you -- maybe I should clarify, "leave MCC" meaning when did you stop
25 working --

1 A August --

2 Q -- for Metropolitan --

3 A As in -- so the last day I was in the building was August 10th. When they terminated
4 me? I don't remember exactly the date.

5 Mr. Foy. But that was --

6 Ms. Feyerabend. But you were --

7 Mr. Foy. It was years --

8 Ms. Noel. Yeah. It was years later, though. But --

9 BY MS. FEYERABEND:

10 Q Were you terminated from MCC as a result of what happened the morning of
11 August 10th, 2019?

12 A Correct.

13 Q Was there an internal review that was conducted by MCC following the incident of
14 Jeffrey Epstein's death?

15 A Yes.

16 Q Was there one conducted by the Federal Bureau of Prisons?

17 A Yes.

18 Q Were you interviewed as a part of those reviews?

19 A Yes.

20 Q What were the findings of those? What were you asked about in those reviews? Do
21 you recall?

22 A I was asked about the culture of MCC, the mandations, the counts, the rounds.

23 Q And what did you tell either MCC or BOP about the culture and everything you just
24 mentioned?

25 A I spoke about how often we were mandated to work. As a result of that, the job was

1 not performed accurately because every -- people were tired. And I attempted to do the count and
2 the rounds, but it has to be conducted with two people, so if the other person is tired, then it cannot
3 be carried out accurately.

4 I also took accountability for performing my job and duties inaccurately.

5 Q Thank you.

6 A You're welcome.

7 Q Why was Mr. Epstein moved to the SHU?

8 A I don't know.

9 Q When did you first learn that Jeffrey Epstein was being moved to the SHU?

10 A When Epstein came in, he went straight to the SHU. So moved, like, cell block? Or
11 moved, like, into the SHU?

12 Q Into the SHU.

13 A He came into SHU.

14 Q Okay. And do you remember the date of that?

15 A He came in in July of 2019.

16 Q Were there any discussions amongst the MCC staff or specifically the SHU staff that
17 Jeffrey Epstein was going to be incarcerated at MCC?

18 A No.

19 Q Was he known to you or to others, to the best of your knowledge, before he was
20 incarcerated?

21 A So, for others, I don't know. For me, no.

22 Q So, for the record, did you know who Mr. Epstein was at the time?

23 A No.

24 Q Had you ever personally spoken to Mr. Epstein prior to him being moved to the SHU?

25 A "Moved" is --

1 Q Okay.

2 A He came into the SHU in July, and I worked in the SHU from June. So, to me, he wasn't
3 moved; he was always in the SHU.

4 Q Okay. I'll rephrase then.

5 A Uh-huh.

6 Q So did you ever speak with Mr. Epstein prior to him being in --

7 A The jail? No.

8 Q -- the jail?

9 So Mr. Epstein, as we all know now, was a high-profile figure; that's why was moved into the
10 SHU. And his case was pretty widely known and reported on before he was incarcerated at MCC.
11 Were any aspects of his case or any of his crimes discussed amongst MCC staff?

12 A No. Not to me.

13 Q No one, to your knowledge, spoke about Mr. Epstein?

14 A To me, no.

15 Q Okay.

16 How long was Mr. Epstein at MCC before his death on August 10th, 2019?

17 A He came in in July, to August 10th, so --

18 Q And you were assigned to work in the SHU for the entire time that Mr. Epstein was held
19 there. Is that correct?

20 A Correct.

21 Q Roughly how many shifts did you work during the time that Mr. Epstein was in the SHU?

22 A I don't know, to give you an actual number. But from June to August 10th.

23 Q June is when you started working in the SHU.

24 A Correct.

25 Q Okay. But Mr. Epstein didn't --

- 1 A Get there until July.
- 2 Q Yeah. And you said earlier that you worked four to five times a week?
- 3 A Uh-huh.
- 4 Q Shifts a week?
- 5 A Correct.
- 6 Q Sixteen-hour-long shifts.
- 7 A Sixteen.
- 8 Q Okay.
- 9 While you were on shift, were you directly responsible for Mr. Epstein's cell?
- 10 A No.
- 11 Q How so?
- 12 A I was responsible for all the inmates in the SHU, not Mr. Epstein's cell.
- 13 Q Sure, but Mr. Epstein's cell was included in all of the cells that you were responsible for?
- 14 A Yes.
- 15 Q Okay. How often were you required to check his cell when you were on duty?
- 16 A The standard required time, conducting irregular 30-minute rounds and counts.
- 17 Q So could you kind of help me explain this a little bit? So you did rounds that were
- 18 every half-hour?
- 19 A Yes.
- 20 Q But then the counts were different than the rounds?
- 21 A Yes.
- 22 Q How so?
- 23 A The counts were conducted at -- so, like, I start at 4:00. There's a 4:00, there's a 10:00,
- 24 midnight, 3:00 a.m., and 5:00 a.m.
- 25 Q 4:00, 10:00 p.m. --

1 A 12:00 --

2 Q -- 12:00 a.m. --

3 A -- 3:00, 5:00.

4 Q And were you responsible for each of those counts --

5 A Yes.

6 Q -- from August 9th to August 10th?

7 A Correct.

8 Q Okay.

9 A Let me just clarify. So, on the 4:00, there's three of us working, so there's two people
10 that have to count. So I don't necessarily have to count. It just has to be two people.

11 Q And this was the same requirement, the counts and the rounds, for all inmates that
12 were housed in the SHU?

13 A SHU. Correct.

14 Q Okay.

15 What was the difference between a round and a count in terms of what you were actually
16 doing or looking for or your responsibilities at that time?

17 A Because a count, you're counting and also making sure you're seeing a live, breathing
18 body. But a round is just seeing a live, breathing body; you're not necessarily counting how many
19 people are in there.

20 Q So the rounds were a bit more relaxed, so to speak?

21 A Correct.

22 Q Okay.

23 So what were the goals or purposes of a round and a count? I know you just mentioned, but
24 if you could --

25 A A round would be to make sure that everyone's okay. A count would be to account for

1 the amount of people that's housed in the unit.

2 Q Okay.

3 Mr. Foy. You might want to let them know --

4 Ms. Feyerabend. We can go off the record.

5 [Discussion off the record.]

6 Ms. Feyerabend. We can go back on the record.

7 BY MS. FEYERABEND:

8 Q Would you fill out any kind of log or report for a round or a count?

9 A So a count happens throughout the whole institution, like, at those specific times that I
10 give you. The irregular rounds every 30 minutes in the SHU is specific to the SHU, not a regular
11 housing unit.

12 In the SHU, the logs are filled out for rounds. The counts -- it's also filled out throughout the
13 whole institution for a count.

14 Mr. Foy. If I could just have one more word with --

15 Ms. Feyerabend. Sure. We can go off the record.

16 [Discussion off the record.]

17 Ms. Feyerabend. We can go back on the record.

18 Ms. Noel. Just to clarify, the rounds in the SHU, it's twice an hour, with no more than 40
19 minutes in between, so it's irregular rounds.

20 BY MS. FEYERABEND:

21 Q Okay. Were you required to fill out a report for every one of those irregular rounds?

22 A Yes.

23 Q What did that report look like?

24 A A log sheet.

25 Q How long would that take you to complete?

- 1 A For the log sheet, I would fill it out before -- like, filling it in before -- or sometimes after,
2 depending on the day, in hopes to make the rounds, not at the accurate time that it's being filled out.
- 3 Q Was that how it was supposed to be done?
- 4 A No, but that's how I seen them do it, so I did that same thing.
- 5 Q Did someone show you how to do it that way?
- 6 A Not specifically showing me, but that's how I observed them doing it.
- 7 Q Okay. And what were you writing down on the round log?
- 8 A The time.
- 9 Q So you would have -- would you have --
- 10 A Like, it'd be the tiers, so I think it'll say, like, "L tier," "J tier," and then it'll have the times.
- 11 Q Okay.
- 12 A And your signature, your initials.
- 13 Q What was the signature supposed to represent?
- 14 A Who did it.
- 15 Q Okay. And were you certifying that the inmates were in their cells?
- 16 A No. You're certifying that you made the round.
- 17 Q Okay.
- 18 A I think the count would be that you're certifying that they're in their cell.
- 19 Q Okay.
- 20 Would you ever report, whether on a round or for an institutional count, any unusual
21 activities?
- 22 A No.
- 23 Q Anything out of the ordinary, that wouldn't get reported?
- 24 A No.
- 25 Q You would only report for the number of inmates for the count and for the round, that

1 they were, in fact, checked on and --

2 A Yes.

3 Q Okay.

4 What were -- the cell blocks in the SHU, what were the lock systems like?

5 A A regular lock. Like, you put the key in, you turn, and it's locked.

6 Q So a physical key.

7 A Yes.

8 Q Would you ever -- whether you were conducting a count or a round, would you ever
9 physically unlock the door?

10 A So the person -- the keys are -- the person that's on the grille doesn't have the key for
11 the cell door. And then the -- the person that's going downrange doesn't have the key for the -- for
12 the cell door.

13 Q Okay.

14 A So it -- you can't really -- not that you can't, but you wouldn't have it.

15 Q So would the access to lock or unlock the door -- the person that was doing the range
16 wouldn't have a key with them.

17 A Right. It'd be the --

18 Q Okay.

19 A It'd be the person on the grille.

20 Q Was that standard?

21 A Yes.

22 Q Was that, like, protocol that was required?

23 A Yes.

24 BY MR. EMMER:

25 Q And I apologize if I'm going to make you repeat yourself, but you'd mentioned earlier

1 that a count required two individuals to conduct. Is that right?

2 A Yes.

3 Q Was that the same for a round?

4 A For a round, no.

5 Q And you had mentioned that Mr. Thomas had told you earlier in the night in question
6 that he didn't want to do a count. Did he ever make any comments about not wanting to do rounds
7 as well?

8 A So let me explain.

9 So, with a count, the person is on the grille, and then one person goes down and counts.
10 Then you switch places; the other person goes down and counts.

11 With a round, you still need two people because somebody has to open the gate, but the one
12 person can make the round. The one person doesn't have to go behind after.

13 So you still need two people physically going to the tier, but the round can just be one person.
14 The count, you have to cross-count.

15 Ms. Feyerabend. What's the gate that you just mentioned?

16 Ms. Noel. Every cell block has a gate, the grille. So, like, to get in the cell block, you're
17 opening the grille door.

18 Ms. Feyerabend. Okay.

1 [10:59 a.m.]

2 Mr. Emmer. Just a general question here. You had mentioned Mr. Thomas and not
3 wanting to conduct the counts. Was that the first time that had happened during your time
4 working the SHU where an individual said they don't want to conduct counts?

5 Ms. Noel. No because I worked the 4 to midnight also where my other colleague was tired
6 from working a triple. He was on the 22nd hour of his shift.

7 Mr. Emmer. Thank you.

8 Mr. Grant. Who was that colleague?

9 Ms. Noel. Bonhomme.

10 Ms. Noel. His name? Bonhomme.

11 BY MS. FEYERABEND:

12 Q So moving forward to August 9, 2019, you checked into your shift at 4 p.m. that day. Is
13 that correct?

14 A Correct.

15 Q And what time did you leave the next day?

16 A After 8.

17 Q A.m.?

18 A A.m., Correct.

19 Q How many rounds did you conduct in the SHU on your shift on that night?

20 A On the 4 to midnight?

21 Q Yeah.

22 A I don't have an exact number. But I did a few rounds. I can't tell you an exact
23 number.

24 Q And what about counts?

25 A For counts, I counted at 10, improperly.

1 Q Improperly because Officer Thomas did not do it with you?

2 A Bonhomme.

3 Q Bonhomme. Thank you.

4 How many rounds would you say that Mr. Epstein's cell got the night of August 9th, 2019?

5 A I can't give you an exact number but a few. Like, we went to go feed -- while you're
6 feeding, you're going to each -- each tier. You're conversing with the inmate. You give out toilet
7 paper. You're going to each cell. You're conversing with the inmate. So there was a few. I
8 can't give you an exact number.

9 And that was on the 4 to midnight, and Epstein was not there the entire shift. Epstein would
10 have come up later on that evening because he was in attorney conference, just to be clear. So,
11 like, at 4 when I had come on, he's not there.

12 Q Do you know what time he came into his cell?

13 A I want to say after 8.

14 Q What did that process look like, the moving of a SHU inmate from one cell, like, with his
15 attorneys, to his SHU cell?

16 A So when Epstein got to the SHU, he came in the SHU with -- his name was Bullock. And
17 he was placed in a shower. He didn't go directly to his -- to his cell. But placed in the shower to
18 use the phone, not to shower.

19 Q Why was there a phone in the shower?

20 A Because that's the only jack that works near the shower. So he was placed there
21 where they plugged it in there because the jack was closest to that shower cell.

22 Q Could inmates make calls from the shower?

23 A That's where they put them in SHU to make the call because the jack is there.

24 Q Right. Could they make calls any time they wanted to shower?

25 A No.

1 Q Was that regulated?

2 A So in the SHU, it's specific to, like, a certain time that you get to use the phone, and I
3 think if you're on the disciplinary, you don't get to use it. That's, like, different. But that day,
4 Bullock allowed Mr. Epstein to use the phone.

5 Q And Bullock was the correctional officer that was --

6 A No. Bullock -- Bullock was a counselor.

7 Q Okay.

8 A A unit counselor.

9 Q Okay.

10 BY MR. GRANT:

11 Q You mentioned that you would converse with inmates when giving them their food or
12 when giving them toiletries such as toilet paper. Can you recall what your interactions with
13 Mr. Epstein were when you would interact with him? Did he seem in good spirits? Did he -- you
14 have conversations?

15 A He was never there for that.

16 Q He was never there for that. Okay.

17 A Correct.

18 Q Is that usual that an inmate is never there when you're providing food or providing
19 toiletries?

20 A For Epstein because he's downstairs with his attorney the entire time that he is allotted
21 to be with his attorney. So 90 percent of the time, he's not on the -- the SHU unit.

22 Q Understood. Thank you.

23 A You're welcome.

24 BY MS. FEYERABEND:

25 Q Were you aware that Mr. Epstein attempted to commit suicide in his cell on July 23rd,

1 2019?

2 A Yes.

3 Q How did you become aware of this incident?

4 A An inmate told me.

5 Q Do you know which inmate?

6 A Tartaglione.

7 Q Is that Mr. Nicholas Tartaglione?

8 A Yes.

9 Q How soon after the incident happened were you made aware of it?

10 A The next day.

11 Q Was that your next shift?

12 A Yes.

13 Q So the inmate told you on your next shift.

14 A Correct.

15 Mr. Grant. Did anyone else at the MCC inform you of Mr. Epstein's suicide attempt? The
16 first one?

17 Ms. Noel. Not to my recollection, no.

18 BY MS. FEYERABEND:

19 Q Were you involved in any way of this handling of the incident?

20 A Of the attempted suicide?

21 Q Yes.

22 A I wasn't on shift that day.

23 Q Okay. Was there anything that was happening the next day while you were on shift?

24 A No.

25 Mr. Foy. I need to have a word real quick with Ms. Noel.

1 Ms. Feyerabend. Go off the record.

2 [Discussion off the record.]

3 Ms. Feyerabend. We can go back on the record.

4 Mr. Foy. The thing I'm trying to clarify, right, you're saying that Jeffrey Epstein attempted to
5 commit suicide on July 23rd, 2019. After the fact, of course, there were reports to suggest that
6 maybe he didn't, right? That it was some sort of way to manipulate his cell situation and different
7 things, whether -- right? -- Tartaglione did something to him and then, of course, Jeffrey doesn't
8 remember what happened. So when we're saying he tried to commit suicide on July 23rd, that's
9 not her saying that because it's up in the air whether that was actually a suicide attempt versus a
10 manipulation on behalf of Epstein in this case.

11 Ms. Feyerabend. Sure.

12 Mr. Foy. So I just didn't want it to be that she is somehow confirming that he tried to kill
13 himself on July 23rd.

14 Ms. Feyerabend. And we have some questions that will come up --

15 Mr. Foy. Okay.

16 Ms. Feyerabend. -- that will help clarify that.

17 Mr. Foy. All right.

18 Ms. Feyerabend. But thank you.

19 Mr. Foy. Yeah.

20 Ms. Feyerabend. So for now, we'll just refer to it as "the incident."

21 Ms. Noel. Okay.

22 BY MS. FEYERABEND:

23 Q As a result of this incident, were you directed to take any specific approaches to
24 Mr. Epstein?

25 A No.

1 Q Did you have to make any sort of special reports?

2 A No.

3 Q Fill out any logs?

4 A No.

5 Q Make note of any of his behaviors?

6 A No.

7 Q Did you have to speak to any MCC psychologists?

8 A No.

9 Q Would MCC psychologists come and visit Mr. Epstein while you were on shift?

10 A No.

11 Q At no point while you were working in the SHU did you see an MCC psychologist visit

12 Mr. Epstein?

13 A No, not on my shift.

14 Q Did you know whether they did?

15 A I don't know.

16 Q We mentioned Mr. Tartaglione. Who did you understand him to be at the time?

17 A Tartaglione was Mr. Epstein's prior cellmate.

18 Q When you say "prior," what time frame are you referring to?

19 A Because after that incident, then Mr. Epstein got a different cellmate.

20 Q In the SHU, correct?

21 A Correct.

22 Ms. Feyerabend. I'd like to enter majority exhibit 1. This is a New York Times article titled,
23 quote, "Purported suicide note is released," end quote. The New York Times recently reported that
24 a Federal judge in White Plains, New York, recently released Jeffrey Epstein's purported suicide note.
25 We'll pass that out and have you take a look at it for just a minute.

1 [Noel Majority Exhibit No. 1
2 was marked for identification.]

3 BY MS. FEYERABEND:

4 Q So on the front, you'll see the New York Times article that was published on May 6,
5 2026, and then the photo of the purported suicide note. I can read how the New York Times
6 Article quoted it.

7 A Okay.

8 Q The note reads, quote, they investigated me for months, found nothing, two
9 exclamation marks, so 16 year old charges resulted. It is a treat to be able to choose one's time to
10 say goodbye. What you want me to do, bust out crying, no fun, not worth it. End quote.

11 Have you ever seen this suicide note before?

12 A No. Never.

13 Q Do you know whether this suicide note belongs to Jeffrey Epstein?

14 A I don't know.

15 Q The New York Times article says that Mr. Tartaglione said he discovered the suicide note
16 in July 2019, after Mr. Epstein's first suicide attempt. Did Mr. Tartaglione ever speak to you or any
17 other correctional officers about the note?

18 A Speak to me about the note? No. To anyone else, I'm not aware.

19 Q Were you ever made aware at the time that a suicide note was discovered?

20 A No. This is my first time seeing it.

21 Q Okay. Did you ever witness or hear anything from other correctional officers about
22 Jeffrey Epstein writing a suicide note?

23 A No.

24 Q Are you aware that when officers responded to Mr. Epstein at 1:27 a.m. on July 23rd,
25 2019, he was found to be unresponsive, on the floor, and with an orange fabric noose around his

1 neck?

2 A In July, I was not working. No.

3 Q Okay. Are you aware that Mr. Epstein had told officers he thought he had been
4 attacked by his cellmate, Mr. Tartaglione, in his cell?

5 A I learned that after.

6 Q How soon after?

7 A When it came out in the paper.

8 Q Okay. Mr. Tartaglione, he denies these accusations and claims that he was the one
9 who called for help. Were you aware of that?

10 A In -- no. Only in the paper I saw that after.

11 Q Okay. Do you have any reason to believe that Mr. Epstein did not attempt suicide on
12 July 23rd, 2019?

13 A I don't, no.

14 Q Do you have any further details of what transpired in the early morning hours of July
15 23rd, 2019, in Mr. Epstein and Mr. Tartaglione's cell?

16 A No. I was not working.

17 Q Okay. Thank you.

18 A You're welcome.

19 Q Were you ever paid not to check Mr. Epstein's cell the night before his death?

20 A Never.

21 Q Did anyone ever force you to not check Mr. Epstein's cell?

22 A Never.

23 Q Did anyone ever threaten you to not check Mr. Epstein's cell?

24 A Never.

25 Q Did anyone ever ask you to not check Mr. Epstein's cell?

1 A Never.

2 Q Do you know whether Mr. Thomas was paid not to check Mr. Epstein's cell?

3 A I don't know.

4 Q Do you know whether Mr. Thomas was forced to not check Mr. Epstein's cell?

5 A I don't know.

6 Q Do you know whether Mr. Thomas was threatened to not check Mr. Epstein's cell?

7 A I don't know.

8 Q Did anyone ever ask Mr. Thomas to not check Mr. Epstein's cell?

9 A I don't know.

10 Mr. Emmer. Thank you.

11 We're coming to the end of the majority's first hour. We're going to discuss this more
12 specifically during the upcoming hours, but there's been payments that have been identified, or
13 reported on, that have been suspicious. Specifically, there was a cash deposit of \$5,000 from an
14 unknown sender on July 30th, 2019, just 10 days before Jeffrey Epstein's death. What was that
15 payment for?

16 Ms. Noel. So you said a unknown sender? Like, I deposited my money into my bank
17 account. And that's from my personal savings plan. And no one has ever approached me about
18 money or given me money in reference to Mr. Epstein at all, ever.

19 Mr. Emmer. For the record, you never -- is it your testimony that you never received any
20 money from Jeffrey Epstein or anyone affiliated with Jeffrey Epstein as it relates to his incarceration
21 at MCC?

22 Ms. Noel. Correct.

23 Ms. Feyerabend. I think that will be the end of our first hour. We can go off the record.

24 [Discussion off the record.]

25 [REDACTED]. We can go back on the record.

1 [REDACTED]:

2 Q Good morning, Ms. Noel.

3 A Good morning.

4 Q My name is Giancarlo Pellegrini. I'll be doing most of the questioning for the minority
5 today. First, thank you for your time and thank you for your service to our country. We
6 appreciate it.

7 A You're welcome.

8 Q As you know, today's conversation will focus on your work at the MCC and the
9 circumstances surrounding Jeffrey Epstein's death.

10 I wanted to start for a moment with a topic that just came up at the end of the previous hour,
11 those cash payments. One of the documents that was released in the DOJ files says that in
12 November of 2019, J.P. Morgan Chase provided a suspicious activity report to the FBI regarding 12
13 cash deposits that you made between April 2018 and July 2019. I know you were just asked a
14 moment ago. Was there any connection between those deposits and your official duties at the
15 MCC?

16 A No.

17 Q Was there any connection, direct or indirect, between those deposits and Jeffrey
18 Epstein or Ghislaine Maxwell in any way?

19 A No.

20 Q There was a deposit specifically for \$5,000 on July 30th of 2019, so that's about 11 days
21 before Mr. Epstein died. I know that's included in what I just asked, but was there any connection
22 of any kind specifically between that deposit and your official duties at the MCC?

23 A No.

24 Q Was there any connection of any kind between that deposit and the death of Jeffrey
25 Epstein?

1 A No.

2 Q And any connection, direct or indirect, between that deposit and Jeffrey Epstein or
3 Ghislaine Maxwell in any way?

4 A No.

5 Q Okay. Thank you.

6 A You're welcome.

7 Q We're going to ask some questions. Some of them are similar to what you were
8 already asked. We have tried to cross those out so you don't have to get asked the same thing
9 twice.

10 A Okay.

11 Q We might not always successfully accomplish that, but we'll do our best.

12 A Okay.

13 Q Couple of questions going to the layout in the SHU. You described there are, I think,
14 six different tiers. Is that right?

15 A Correct.

16 Q And how many cells in each tier?

17 A That, I don't remember.

18 Q Is there a locked door for each tier? You talked about the grille.

19 A Grille.

20 Q What's the grille?

21 A It's the -- so it's -- because it's a grille, because it's not an actual door and that's what
22 allows you to enter the tier, and that's locked.

23 Q And so there's a physical key to get into that?

24 A To -- yes.

25 Q Okay. So to get into any of the tiers, one of the COs needs a key --

1 A Key. Correct.

2 Q Okay. We do have an additional member who has since joined us. If that member
3 could just identify himself.

4 Mr. Khanna. Ro Khanna from California 17.

5 [REDACTED]: Thank you.

6 [REDACTED]:

7 Q How many -- in the SHU specifically, how many inmates would there typically be in each
8 cell?

9 A It could be one or two.

10 Q Is there any rhyme or reason as to whether it's one or two?

11 A So the SHU doesn't have to be full. If it's full, then it will be two because the maximum
12 it can hold in one cell is two. But it could be just one.

13 Q As far as you can recall, would it be one in every cell, and then once that's done, you
14 start adding cellmates?

15 A No. So like, for example, let's say if on L tier there is, like, everybody paired up and
16 somebody got in trouble from a different unit and they're coming and they're single, they have to
17 place them in a cell. So they may be alone until somebody else comes in that has to go to the SHU
18 or if somebody else got in trouble, then they could pair them with them. Or, if for whatever reason,
19 that inmate, for whatever their stipulation is, needs to be with someone, they can move someone
20 from someplace else and put them with them. So it can be single or double depending on what
21 specific to the inmate is going on.

22 Q Thank you. That's helpful.

23 The SHU, I think, we read had a -- had two different entrances, a primary entrance and a
24 secondary entrance. Is that right?

25 A Correct.

1 Q What was the difference between those entrances in terms of who would use them?

2 A So for the outer door, that has to be propped by control. The inner door, someone on
3 the inside has to let you in.

4 Q Got it. But is it right that there were -- so I understand, that's the way to get into the
5 SHU where you have to go through two different doors.

6 A Correct.

7 Q Was there a totally different second way to get into the SHU, a different entrance of any
8 kind? Or was it just the one you're describing?

9 A The one that I'm describing. That's the only one that I know, the double doors.

10 Q Okay. Can you describe your recollection of how a typical cell in the SHU would have
11 been laid out?

12 A It's a bunk bed and the bathroom area, if you want to call it. That's pretty much it. A
13 bunk bed and I think, like, a sink, a toilet, and a little mirror, I guess.

14 Q And you talked a little bit about this. Where did the COs sit when you were on duty in
15 the SHU?

16 A When you come into the SHU, in the common area, right in the middle.

17 Q Is there, like, a table and chairs kind of thing?

18 A It's a desk, like a L.

19 Q From that desk, were you able to see all cell doors? Any cell doors? What could you
20 see in term of the cells from the desk?

21 A From that desk, if you're sitting -- because the desk is a L -- so if you're on this side, no.
22 If you're on the front side, then you can see just the beginning of L tier on the right side. So you can
23 see the door.

24 Q And from that point at the desk, would you -- if you remember, would you have been
25 able to see Mr. Epstein's cell door?

1 A From the front of the desk, yes.

2 Q Would you have been able to see into his cell?

3 A No.

4 Q Would you have been able to see from, I guess, that spot on the desk, anybody entering
5 or exiting the SHU?

6 A Definitely.

7 Q And there was a separate unit that got mentioned called ten south.

8 A Correct.

9 Q What is ten south?

10 A So on the last tier, you can go up the stairs and go to ten south. That's a more secure
11 area. And it's like a wing up there. But it's laid out differently. It's supposed to be more secure
12 than SHU. And SHU is secure.

13 Q What is the typical difference or was the typical difference between inmates in ten
14 south versus in SHU? How do you land in ten south?

15 A How do you land in ten south, I don't know. But I do know in ten south, you're not
16 coming out, whereas they get an hour in SHU to come out. You're not coming out. You can't even
17 go to your attorney. The attorney goes up to ten south to you. So it's very secure. But as far as
18 how you get to ten south, I'm not aware.

19 Q Is it correct that the only way to get into ten south is to go or was to go through the
20 SHU --

21 A SHU. Correct.

22 Q You touched on it previously but just here all in one place, for your two shifts in the SHU
23 on August 9th and 10th, who were your co-workers for each shift?

24 A So on August 9th it was myself, Bonhomme, and David. On August 10th, it was myself
25 and Thomas.

1 Q And I think you had said that was your first time working with Thomas. Is that right?

2 A Correct.

3 Q How about for Bonhomme and David?

4 A I worked with -- Davis.

5 Q Davis.

6 A So for -- I worked with Davis before. And I worked across from Bonhomme before.

7 Q And for all three of those colleagues, what was the chain of command, if there was one,
8 between you? Did you report to any of those individuals?

9 A No. We're all correctional officers. The only one that would have had a different title
10 would have been Michael Thomas as a materials handler.

11 Q Were all of them or any of them senior to you?

12 A Senior, as in they've been there longer than me, yes.

13 Q Is that the case for all three of them?

14 A All of them, correct.

15 Q When that was the case, would it typically be that -- I know you would not report to
16 them. But would they sort of practically or informally be in charge, so to speak?

17 A Correct.

18 Q And who were the lieutenants or supervisors for each of those two shifts?

19 A So on the 4 to midnight, Kanata (ph) called to mandate me, so it was Kanata (ph). And
20 then on the midnight to 8 in the morning, it was Lieutenant Anderson.

21 Q Was this your first ever overnight shift at the SHU?

22 A Correct.

23 Q Do you recall who was working in ten south for those two shifts?

24 A For the 4 to midnight, don't recall. Midnight to 8, it was Adams.

25 Q Would it usually just be one guard or one CO in ten south?

1 A Yes. It's supposed to be two but it's one.

2 Q Is that because you guys were undermanned, short-staffed?

3 A Correct.

4 Q Like to get a little bit more background on counts and rounds. I'll just start with
5 counts, which I know you did discuss a little bit.

6 A Okay.

7 Q Is it right that the basic purpose of a count is to count the number of folks in the unit?

8 A Correct.

9 Q Okay. And the process for a count, I think as you described it, involves two guards. Is
10 that right?

11 A Correct.

12 Q One stands at the grille of a tier. The other one goes downrange?

13 A Correct.

14 Q And is counting inmates, would that typically be as they see them through the cell
15 window?

16 A Correct.

17 Q Okay. Would that ever involve opening a cell door or never?

18 A Never.

19 Q Would the count typically involve visually confirming that an inmate is alive and
20 breathing?

21 A Correct.

22 Q And in terms of paperwork, writing the count down, what would that process normally
23 be?

24 A On the count slip, it will be the number that you counted. And remember, it's two
25 people counting, so it's like the two people saying yes, we both agree to this count. So it will be two

1 signatures on the bottom of the count slip. And it will have the unit, the name of the unit on there.

2 Q So would one guard usually go downrange, count, and then you switch and the other
3 guard goes and does the same thing?

4 A Correct.

5 Q And would you normally know what number you're supposed to get or is it just a matter
6 of counting what you see?

7 A So normally we know before the number that you're supposed to get.

8 Q I don't know if it ever happened in your case or if anybody ever mentioned. But if
9 there were a mismatch in the numbers, you're not seeing the number that you thought you would
10 see, what would typically happen at that point?

11 A If there was a mismatch, recount to make sure you counted accurately. If there's still a
12 mismatch, then control -- call control.

13 Q Who or what is control, just for us?

14 A Okay. So control is downstairs on the first floor, and these are the people that you
15 report the count to, because you have to call the count in. Control also, like, when you come into
16 the building, that's who you show your ID to. So it's like a control center, the officers downstairs in
17 control.

18 Q In terms of the count process that you just described, when you would either participate
19 in it or see it happen, did it look different from what you just talked about, or would it typically match
20 your description of the process?

21 A It would typically match the description of the process.

22 Q And you did describe this also, but another thing that would happen during each shift
23 would be rounds. Is that right?

24 A Correct.

25 Q And what is the purpose of a round?

1 A The purpose of the round is to make sure that the inmates are okay.

2 Q And there are round logs, I think you said. Is that right?

3 A Yes. Correct.

4 Q And this is a one-guard job or always two guards?

5 A So it will be two because you need one person to open the grille and one person to go
6 down. But you're not verifying, like, how you would do with the count.

7 Q Got it. And is the round log -- I heard you talk about there need to be, I think, two
8 signatures. Is that right?

9 A So no. It doesn't -- the two signatures for the count slip. The round log, it's one -- so
10 if I made a round at 10 and I logged it and I put my signature, and I go down to the bottom tier, you
11 can make the other round. Or I can make all the rounds and then the next time you can make it.
12 So rounds are not specific to a person.

13 Q And what is the -- you sign and you submit the round log. Is it trying to say -- it's
14 obviously saying yes, I did this round. Is it saying, and nothing bad happened or everybody was
15 fine? What is being signaled by the round slip?

16 A I would think that's what the round slip signaled, like, yes, I made this round at this time.

17 Q Does it involve the same amount of making sure every inmate is breathing or is it
18 something less than that?

19 A Yes, every inmate is breathing.

20 Q So is it essentially the same as a count except --

21 A You're not counting --

22 Q -- you're not going through -- right --

23 A Correct.

24 Q You're not counting. Got it.

25 In terms of other required activities during a shift, what would those be? I think you

1 mentioned feeding inmates dinner?

2 A Correct.

3 Q And that would be specific to the 4 p.m. to midnight shift, right?

4 A Correct.

5 Q Okay. Anything else such as toiletries or anything else?

6 A Yes. Toilet paper, if you're giving out toilet paper.

7 Q Is the toilet paper or toiletries, is that a thing that happens at a specific time for
8 everybody? Or is it just as people ask for it?

9 A I'm not sure. If they ask for it, we give it to them. But I don't know if it's supposed to
10 happen at a different time.

11 Q But in your experience, it was kind of a whenever people say hey, I need some toilet
12 paper.

13 A Correct.

14 Q Okay. Anything else that would typically happen on every shift?

15 A Orderlies cleaning up. I mentioned that earlier. Orderlies will be out cleaning up.
16 Or sometimes -- there's a little library. A orderly can be in the library reading. While other than
17 that, for the most part, in SHU, they're locked in.

18 Q Thank you. My colleague has a few questions about the timeline, and so I'll turn it
19 over.

20 A Okay.

21 [REDACTED]:

22 Q Ms. Noel, I just have a few questions related to Epstein's time at MCC before August 9th
23 and August 10th.

24 A Okay.

25 Q So it's our understanding from the OIG report that Epstein was arrested and brought to

1 MCC on July 6th and that he was initially placed in general population, and then that on July 7th, he
2 was moved over to the SHU. Were you aware of that?

3 A No.

4 Q Okay. So it was your understanding that he was brought directly to the SHU --

5 A To the SHU.

6 Q Okay. And we established earlier, I think, that he was brought to the SHU because of
7 the high-profile nature of him and his case.

8 A Correct.

9 Q Is that correct? Okay. Did you hear of anyone harassing Epstein in general
10 population?

11 A No.

12 Q Okay. Did you hear anything about other inmates trying to get him to put money in
13 their commissary accounts --

14 A No.

15 Q -- in exchange for protection?

16 A No.

17 Q Okay. Did you ever hear of Epstein paying any other inmates to protect him, either in
18 general population or in the SHU?

19 A No.

20 Q Okay. And when is the first time that you met or spoke to Epstein?

21 A The first time that I spoke to Epstein would have been August 9th.

22 Q Okay. On July 8th, Epstein was screened by a psychologist and was placed on
23 psychological observation. Were you aware of that?

24 A Yes.

25 Q Okay. And is this something that typically happens when an inmate is brought into the

1 SHU? Are they usually given a psychological screening?

2 A They're supposed to.

3 Q Okay. And is that just when they're brought into the SHU or when they're brought into
4 general population or another unit?

5 A That, I'm not sure.

6 Q Okay. You're just aware of the SHU process.

7 A Just --

8 Q Okay. And we talked about the events of July 23rd, so I'm not going to get into that,
9 but I would like to ask a little bit about the suicide watch process. So it's our understanding that he
10 was placed on suicide watch that same day, but then was taken off of suicide watch the next morning
11 on July 24th. Is that your understanding as well?

12 A Yes.

13 Q Okay. And what is suicide watch? Could you describe the process of that a little bit?

14 A So when you're on suicide watch, you're not upstairs in the SHU.

15 Q Okay.

16 A You're downstairs in a holding cell with no garments, no shoestring -- it's like a smock,
17 like a Velcro smock. And you're being watched 24 hours by another inmate.

18 Q Okay. By another inmate?

19 A Correct.

20 Q What about the MCC staff? Is there staffers that work in the holding cell area as well?

21 A I'm not sure. I just know the actual inmate has to be -- eyes has to be on the person all
22 the time by another inmate. As far as another staff, I'm not sure.

23 Q Okay. Is the other inmate a cellmate or they just there to watch?

24 A No. They wouldn't have been a cellmate. They're not even from the SHU. It would
25 have been an inmate from -- because some inmates are allowed to work, so that will be that inmate's

1 job. Like, they're working.

2 Q Okay. And do you have an understanding of why someone's placed on suicide watch?
3 Obviously, we know why Mr. Epstein was, but other reasons that individuals would be placed on
4 suicide watch?

5 A If they're saying that they -- some people just say it or I -- some people attempt. They
6 will be placed on suicide watch. I don't know of any other reason why they would be placed.

7 Q Okay. And how about why someone would be taken off of suicide watch?

8 A That, I'm not -- I'm not aware of the process.

9 Q Okay. And was it normal -- it sounds like Mr. Epstein was on suicide watch for about
10 24 hours. Is that a typical time, from your understanding?

11 A I'm not aware of the process of the -- that would be the psychologist.

12 Q Okay. And do you know why Mr. Epstein was taken off suicide watch?

13 A I don't know.

14 Q Okay. So then it's our understanding that he was moved to something called
15 psychological observation and he was on -- under psychological observation from July 24th to around
16 July 30th. Is that correct, to your recollection?

17 A Yes.

18 Q Okay. And then could you also just describe what psychological observation is?

19 A I don't know.

20 Q Okay. Do you know if it looks similar to suicide watch?

21 A I have no idea.

22 Q Okay. And are you aware of whether inmates have a cellmate when they're under
23 psychological observation?

24 A I don't know.

25 Q Does psychological observation also take place in the hold room, or are they in the SHU

1 when they're under --

2 A Psychological observation, I don't know.

3 Q Okay. So you're not aware of whether or not he was in that same holding room?

4 A Right. I don't know.

5 Q But he was brought back to the SHU after that psychological observation ended, to your
6 understanding?

7 A Correct.

8 Q On July 30th?

9 A Correct.

10 Q Okay. And he was placed in a different cell when he was brought back. Is that --

11 A Correct because he wasn't with Tartaglione anymore.

12 Q Yes. So that was when he was moved to the L tier?

13 A Correct.

14 Q And to your understanding, before that, I think, he was in the M tier. Is that correct?

15 A I don't remember the letters, but he was on the bottom. Where he was with
16 Tartaglione before, they were on the bottom of the middle tier to the --

17 Q Okay. Thank you. And on July 30th, a staff psychologist from the psychological
18 department sent an email to over 70 staff -- BOP staff stating that Epstein, quote, "needs to be
19 housed with an appropriate cellmate." Did you receive that email?

20 A I never saw that email.

21 Q Okay. Were you aware of it existing?

22 A After the fact.

23 Q Okay. And how did you find out about the email?

24 A When I was questioned.

25 Q Okay. So no one mentioned it to you before --

1 A In -- no.

2 Q Okay. Do you recall ever being aware of the fact that Epstein needed to have a
3 cellmate?

4 A No.

5 Q Okay. And the email says, "an appropriate cellmate." Do you have an understanding
6 of what an appropriate cellmate would have been in this instance?

7 A No, because the warden has to make that call.

8 Q Okay. And it's our understanding that on July 30th when he came back to the SHU,
9 Epstein was assigned an inmate named Efrain Reyes as a cellmate and that Reyes remained his
10 cellmate until August 9th.

11 A Correct.

12 Q Is that also your understanding?

13 A Correct.

14 Q Okay. And on August 8th, Epstein met with his attorneys and he changed his last will
15 and testament. Did you have any knowledge that he had done that at the time?

16 A After the fact -- at the time, no.

17 Q You learned after he died.

18 A Correct.

19 Q Okay. You didn't hear anyone else mentioning it or anything, days leading up to?

20 A No.

21 Q Okay. And then the OIG also reported that Epstein's daily routine was to meet with his
22 attorneys in the conference room. You mentioned that as well. Are you aware that -- was this
23 what was happening on August 8th? Was that his schedule?

24 A Yes.

25 Q Okay.

1 Mr. Foy. You said August 8th?

2 [REDACTED] Yes, when he signed his last will and testament.

3 Ms. Noel. Yes.

4 [REDACTED] Yes.

5 [REDACTED]:

6 Q And you were working that day?

7 A August 8th? Yes.

8 Q Okay. That's all from me.

9 [REDACTED]. We're going to go, if we can -- I think one of the members present has a few
10 questions he'd like to ask, so we're going to go down there.

11 Mr. Subramanyam. Thank you. I apologize. I have to leave a little early. But thank you
12 for being here. I appreciate you coming voluntarily and answering these questions. You said
13 something earlier about you'd not received any sort of compensation for anything related to Jeffrey
14 Epstein, and no one --

15 Ms. Noel. Correct.

16 Mr. Subramanyam. Does that apply to anyone that you know, any friends or relatives or --

17 Ms. Noel. Anything in regards to Mr. Epstein, I've never received any money.

18 Mr. Subramanyam. And what were those bank account payments for, the one -- for
19 instance, the \$5,000 one?

20 Ms. Noel. My savings, my personal savings.

21 Mr. Subramanyam. So do you -- you were shifting money from one account to another?

22 Ms. Noel. No. I do savings challenges for myself.

23 Mr. Subramanyam. Oh, I see. So you were going -- you were sending money to a savings
24 account?

25 Ms. Noel. No, not sending. Like, I save -- I do savings challenge books.

1 Mr. Subramanyam. Okay.

2 Ms. Noel. And then when I get to my goal, I deposit my money.

3 Mr. Subramanyam. Oh. So you were saving it personally and --

4 Ms. Noel. Yes.

5 Mr. Subramanyam. -- then you deposited the money all at once. Was it a cash deposit or --

6 Ms. Noel. Yes.

7 Mr. Subramanyam. Okay. Thank you. And then do you have any reason to believe that

8 Jeffrey Epstein did not commit suicide?

9 Ms. Noel. No.

10 Mr. Subramanyam. Or died in any other way?

11 Ms. Noel. No.

12 Mr. Subramanyam. Because you had mentioned that you didn't actually see him hanging --

13 Ms. Noel. Correct.

14 Mr. Subramanyam. -- in a previous interview. But you strongly believe that there is no

15 other -- you've ruled out any other sort of cause of death --

16 Ms. Noel. Right, because there was no one else in there.

17 Mr. Subramanyam. Great. And then you did an interview with the DOJ in 2021. You said

18 that a lieutenant placed Jeffrey Epstein in the shower stall to make a 20-minute personal

19 unmonitored phone call to his girlfriend in Belarus. Is that correct?

20 Ms. Noel. I don't know who he made the phone call to, but I know he was placed in there to
21 make the phone call.

22 Mr. Subramanyam. Great. And --

23 Ms. Noel. Not by a lieutenant. By Bullock, a counselor, unit counselor.

24 Mr. Subramanyam. Unit counselor. Yeah. You mentioned that earlier?

25 You also told investigators that Epstein was the only person to be allowed to have a long cord

1 for his sleep apnea machine. Is that true --

2 Ms. Noel. Correct.

3 Mr. Subramanyam. Could you tell me more about that, why he was able to get a sleep
4 apnea machine?

5 Ms. Noel. So that would have been authorized by, like, psychologists or the warden. But
6 he was the only one in the SHU that had a C-PAP machine. And the way how the tiers are, like, how
7 they're up and down -- so he was on the upper. So the C-PAP is in the cell, and there's a long cord
8 that has to extend out of the cell to reach down, because he's up, to meet an outlet.

9 Mr. Subramanyam. Okay. Would he have been able to yank that cord out --

10 Ms. Noel. Absolutely.

11 Mr. Subramanyam. And -- okay. This would have been the warden that would have
12 cleared this?

13 Ms. Noel. Or the psychologist. I don't know who makes the decision to allow him to have
14 a C-PAP machine or who gave it to him.

15 Mr. Subramanyam. And then this is a long time ago, so it may be hard to remember, but
16 when you were walking through and when you saw his cell, did you notice any extra bed linens that
17 may have been in his cell?

18 Ms. Noel. No. After.

19 Mr. Subramanyam. Afterwards, you noticed that? Do you know why he was given extra
20 bed linens?

21 Ms. Noel. So I'm not aware of him having extra bed linen. He had linen on his bed, and
22 Reyes had linen on his bed.

23 Mr. Subramanyam. Okay. Yeah. There was some reporting that he had extra bed linens?

24 Ms. Noel. Yeah. I'm not aware of --

25 Mr. Subramanyam. You're not sure --

1 Ms. Noel. -- why or who --

2 Mr. Subramanyam. Is it common for someone in the SHU to have extra bed linens?

3 Ms. Noel. No.

4 Mr. Subramanyam. Okay. Was there any other -- anything else, as far as Jeffrey Epstein's
5 treatment, that you would consider, like, special treatment that was unique from other people who
6 were there?

7 Ms. Noel. I don't know who allowed him to have his medication. That's not supposed to
8 be.

9 Mr. Subramanyam. By "medication," which medication are you talking about?

10 Ms. Noel. I don't know which, but he had a bunch of medication in his cell. In the SHU, a
11 nurse comes and administers medication to other inmates. I don't know who allowed him to have
12 his own personal medication.

13 Mr. Subramanyam. And then one of the files in the FBI's library of Epstein files includes an
14 account that alleges Jeffrey Epstein met with a guard with the first name James only days before
15 Epstein was found dead. Do you know who James is?

16 Ms. Noel. James?

17 Mr. Subramanyam. Yeah. There was a file that said that someone named James met with
18 Epstein a few days before. Are you aware of this meeting at all?

19 Ms. Noel. No.

20 Mr. Subramanyam. Okay. Is there anyone named James that you worked with or --

21 Ms. Noel. Not that I know of.

22 Mr. Subramanyam. Okay. And then there was also a report that detailed an interview
23 between the FBI and unnamed inmate at the jail. In the report, the inmate shares that he
24 overheard you after Epstein was found dead saying that, quote, if Epstein is dead, we're going to
25 cover it up, and he's going to have an alibi, my officers.

1 Do you know anything about this? And was that officer you?

2 Ms. Noel. No.

3 Mr. Subramanyam. And did you say that --

4 Ms. Noel. No.

5 Mr. Subramanyam. -- at any point? Okay. Thank you.

6 And then -- so inmates at the Metropolitan Correctional Center were -- evidence found to
7 have reportedly said, quote, Ms. Noel killed Jeffrey Epstein, unquote, after they found out about
8 Epstein dead. Do you know of an inmate saying that?

9 Ms. Noel. No.

10 Mr. Subramanyam. And do you know why they would say that?

11 Ms. Noel. No.

12 Mr. Subramanyam. Okay. And then I guess I would also ask just generally if in hindsight,
13 looking back at everything that happened, do you have regrets about anything that happened as far
14 as not checking on him, knowing who he was now and the damage he caused and his -- the damage
15 his death caused?

16 Mr. Foy. Hold on one second.

17 [REDACTED]. We can go off the record for a moment.

18 [Discussion off the record.]

19 [REDACTED]. We can go back on the record.

20 Mr. Subramanyan. Would you like me to repeat the question?

21 Ms. Noel. Yes.

22 Mr. Subramanyam. Yeah. Looking back at everything that's happened, do you have any
23 regrets, or maybe even remorse about what transpired as far as your actions or the actions of MCC?

24 Ms. Noel. So I would have liked to have conducted the counts and rounds, understanding
25 that if they were done, that suicide could have still taken place. My only regret is that I worked for

1 MCC, a poorly ran institution?

2 Mr. Subramanyam. Follow up one thing there. You said that even if you had done the
3 counts and rounds, the suicide could have still occurred?

4 Ms. Noel. Correct.

5 Mr. Subramanyam. Okay. That's all my questions.

6 [REDACTED]. All right. I have a few more questions.

7 [REDACTED]:

8 Q We're going to try to walk through the timeline of August 9th and 10th, just kind of one
9 step at a time.

10 A Okay.

11 Q One thing I think we wanted to try to clarify before we even kick that off is inmate
12 movements in and out of the SHU. I think that's caused some confusion in terms of what exact
13 numbers on which exact count slip and what was the right number. So I'm going to introduce an
14 exhibit which I'll mark as minority exhibit A.

15 [Noel Minority Exhibit A

16 was marked for identification.]

17 [REDACTED]. I'll give you a moment to look that over.

18 [REDACTED]:

19 Q I know I gave you the longest one-page document in the history of documents. I
20 appreciate you looking it over. I know there's a lot on here.

21 This document is called "Count Discrepancies on August 9th, 2019." It was part of the DOJ
22 release. We don't know exactly what it is. We think probably it's written by the OIG when they
23 were first trying to figure things out, but we don't know that for a fact. But it does say at the top
24 that it is based on the daily activity report and lieutenant log from August 9th and 10th.

25 First, do you have an understanding of what a daily activity report is?

1 A No.

2 Q Okay. How about a lieutenant's log?

3 A No.

4 Q Okay. This document has inmate movements for the SHU on the 9th and 10th, and it's
5 got specific times on it. We think those times are probably linked to the Century system. Are you
6 familiar with what the Century system is?

7 A Yes.

8 Q What is that?

9 A The Century system is the system that has the accurate number of the inmates in the
10 institution. That's all I know.

11 Q Did you ever know or do you remember whether the Century system would be used to
12 log inmate movements?

13 A I don't know what they use to log it.

14 Q Okay.

15 A Uh-huh.

16 Q Would you have had any knowledge of whether inmate movements are logged at the
17 exact time a movement happens or maybe a few minutes after something happens?

18 A Yeah. I don't know when they log it.

19 Q Okay. So I'm going to walk through a few of these individual inmates. I know it was a
20 long time ago. I'll just ask to the best of your recollection. It looks as if the day started with 77
21 inmates in the SHU which, I guess, is also called ZA. Were you familiar with that?

22 A Yes.

23 Q Okay. So ZA also means SHU. Is that right?

24 A Correct.

25 Q Great. And at 8:38 in the morning, inmate Reyes was preremoved out of the SHU and

1 did not come back, and our understanding is that that was Mr. Epstein's cellmate. Is that also your
2 understanding?

3 A Correct.

4 Q Okay. And that would take the SHU number down to 76. This happened at 8:30 in
5 the morning, or 8:38. You did not start work until 4 p.m. I know that. But do you recall whether
6 anybody mentioned to you that Reyes had been removed from the SHU?

7 A No. No one.

8 Q No one mentioned it to you?

9 A No.

10 Q And so, did that leave you with the impression that Mr. Epstein still had a cellmate when
11 you arrived?

12 A When I first got there, yes.

13 Q Was there some point in the day where you noticed that it did not look like he actually
14 had a cellmate?

15 A After lock-in.

16 Q Got it. And do you recall specifically when or how you would have noticed that?

17 A Because after -- even if an inmate is moved to somewhere, usually everybody will be
18 back by the time of lock-in. And at the time of lock-in, there was not an inmate back other than
19 Epstein.

20 Q What time is lock-in usually?

21 A I don't remember the exact time, to be honest.

22 Q Ballpark?

23 A I want to --

24 Q I won't hold you to it. It doesn't have to be exact.

25 A Well, in SHU, they're always locked in. So SHU is different. But I think in regular

1 general population, 9:00 maybe. But remember in SHU, they're not out unless you're orderlies.
2 But by the time of count time, if you're somewhere, you would be back. So that's why Epstein has
3 to come up before 9:00 because it's an institutional count, if that makes sense.

4 Q It does. Would that be the 10 p.m. count?

5 A Correct.

6 Q Okay. So sometime around that 10 p.m. marker, you recall noticing, Hey, everybody's
7 locked in at this point, but there's nobody actually in Mr. Epstein's cell other than Epstein.

8 A Correct.

9 Q Okay. Do you recall whether you discussed that fact with any other guards at the
10 time?

11 A No, I didn't.

12 Q Did you have any understanding at the time of whether or not Mr. Epstein was
13 supposed to have a cell -- I understand you knew that Reyes was assigned to that cell, but whether
14 there was some kind of policy that Mr. Epstein needed to always have a cellmate?

15 A I was not aware.

16 Q Anybody ever mention that, that you can recall?

17 A No.

18 Q Okay. Some of these other inmates coming and going, at 3:15 p.m., inmate Fernandez
19 left the SHU for a dry cell in RA. That's 45 minutes before you arrived. Did anybody mention that
20 to you at the time?

21 A No.

22 Q And then during your shift, there were a few more departures. So somebody named
23 Hemmingway departs at 6:34 p.m., and then a few minutes later, an inmate named Reid also leaves.
24 Those are both in your first 2 or 3 hours at work. Do you recall anybody mentioning or, I guess,
25 would you have seen Hemmingway or Reid leave the SHU?

1 A To be honest, I don't recall these two inmates leaving.

2 Q Got it. Would that likely be -- would you physically be in the SHU essentially during
3 your entire shift?

4 A I would be in the SHU my entire shift unless if I went to the bathroom on ten south.

5 Q Understand. And so I guess is it -- the likeliest scenario is these guys leave, but you
6 don't necessarily recall, sitting here today, that happening?

7 A Correct.

8 Q Okay. And then at 8:21 p.m., Felix and Williams left for suicide watch, and you just
9 described before what suicide watch was. Do you recall those two inmates leaving?

10 A I don't.

11 Q Okay. And around 8:30, an inmate named Garcia-Pena moved into the SHU. That's
12 the only inmate we're aware of coming into the SHU that day. Do you have any recollection of
13 Mr. Garcia-Pena arriving?

14 A No.

15 Q Okay. So it ends up being, I think, a total of six inmates leaving, one arriving that day.
16 You don't really have a recollection of any --

17 A Of any of that, no.

18 Q Okay. Is it right that as far as you remember, Mr. Epstein was out of the SHU most of
19 the day with his lawyers?

20 A Correct.

21 Q Okay. So you started your first shift at 4 p.m., and right away, it would have been time
22 for the 4 p.m. count. Is that right?

23 A Correct.

24 Q That count slip, I think, was signed by yourself and the evening watch officer in charge.
25 There was some question about whether or not that count happened. Sitting here today, to the

1 best of your recollection, did you or your colleagues conduct the 4 p.m. count?

2 A I didn't conduct the 4 p.m. count.

3 Q Since there were a total of three of you, do you know whether the other two guards
4 conducted the 4 p.m. count?

5 A I don't recall.

6 Q Okay. I think your signature was on the 4 p.m. count slip, though. Is that correct, as
7 far as you know?

8 A I think so.

9 Q With respect to Mr. Epstein's phone call --

10 A Uh-huh.

11 Q -- which we understand to be sometime around 7 p.m., Mr. Epstein -- this is our best
12 understanding, and then I'll ask you.

13 A Okay.

14 Q Our understanding, Mr. Epstein was escorted to the SHU shower area so that --

15 A Correct.

16 Q Is that right?

17 A Correct.

18 Q So that he can make a phone call. The phone call was not monitored or recorded, and
19 Mr. Epstein was left alone for the conversation. Do you have any knowledge of that personally?

20 A Yes.

21 Q Okay. What is your recollection of that?

22 A Mr. Epstein came into the SHU with Bullock. Bullock placed him in the shower,
23 plugged in the phone, and gave it to him. He didn't say anything to any of us. And he left.

24 After a long while, he called. I answered the phone, and he said, "Take the phone from
25 Epstein because his time is up." I went to the shower cell and I told him his time was up, and I took

1 the phone from Mr. Epstein.

2 Q And the "he" is Bullock. Is that --

3 A Bullock. Correct.

1 [12:15 p.m.]

2 [REDACTED]:

3 Q Okay. Did you -- would you have been able to overhear any of that conversation from
4 wherever you were sitting at the time?

5 A No.

6 Q Did you overhear any of the conversation when you came in to take the phone from
7 Epstein?

8 A No.

9 Q Did Epstein -- well, let's do this. What did you say to Mr. Epstein when you entered
10 the shower area?

11 A That Bullock told me to take the phone from him because their time was up. And he
12 told me, "Okay," and he told the person, "Bye."

13 Q And that's it, as far as you remember?

14 A Correct.

15 Q It sounds like Epstein was on a line that's supposed to be for calls with lawyers, which
16 this was not.

17 Were you familiar at the time with how inmate phone calls were normally supposed to work
18 at the MCC?

19 A Not in the SHU. I'm not familiar.

20 Q Did you -- if you remember, did you have a sense at the time that this was an unusual
21 setup for an inmate's phone call?

22 A No.

23 Q It did not look out of the ordinary to you?

24 A No, because the jacks don't work, so you have to put them where the jack is working.

25 But I learned after that it was unmonitored. As far as what's monitored and what's not monitored, I

1 don't know.

2 Q Do you recall in your time in the SHU seeing Bullock or somebody at Bullock's level or I
3 guess anybody --

4 A Uh-huh.

5 Q -- from MCC staff putting an inmate in that same shower area for a phone call?

6 A Yes.

7 Q Okay. Can you estimate maybe roughly how many times?

8 A I can't. Maybe two.

9 Q And, if you can recall, would that have occurred with an inmate other than Epstein?

10 A Yes.

11 Q Okay. So it did not strike you as something unprecedented that you had never seen
12 before.

13 A No.

14 Q You also mentioned to the IG that you fed Epstein dinner sometime after his phone call,
15 after he went back to his cell. Is that right?

16 A Correct.

17 Q Do you recall roughly what time that would've been?

18 A I don't have a time.

19 Q Would it be before or after the 10:00 p.m. count?

20 A It would've been before.

21 Q Okay. And roughly what time would he have gone back to his cell from the phone call?
22 I guess 7:15 or 7:30?

23 A Or about 8:00. After 8:00.

24 Q Got it. Okay.

25 A Because after the phone was taken from him, he wasn't moved right away. He was left

1 in there, the shower. Because you can't move an inmate when orderlies are out, because they can't
2 cross each other. So he wasn't moved right away. He was left in there.

3 And then I went to the bathroom, and when I came back, he was moved. He was in his cell.

4 Q Could you estimate, to the best of your recollection, how long he would have been left
5 in the shower area after the phone was taken from him?

6 A About 10 minutes.

7 Q And it sounds like there were orderlies out and about doing work at the time?

8 A Correct.

9 Q Was this the normal time that orderlies, sort of, every night in the SHU would be out
10 doing work? Or did it change from day to day?

11 A It would change.

12 Q Okay. Just on this particular day, that's --

13 A They --

14 Q -- when they were out.

15 A Correct.

16 Q Okay.

17 With respect to feeding Mr. Epstein dinner, was that at the same time that you fed everybody
18 in the SHU --

19 A No.

20 Q -- dinner? Okay. It was specifically Mr. Epstein.

21 A Correct.

22 Q Was that just because that's when he got back from the phone call?

23 A 'Cause feeding would've been at 4:00, when I come onto my shift, where everybody eats
24 from downstairs. Epstein doesn't eat from downstairs. He eats what's called "common fare,"
25 because he's kosher.

1 Q Got it. So he's getting food from a different source because of the kosher restriction?

2 A Yeah. So the inmates get, like, prepared, cooked food. His is, like, a
3 prepackaged -- like, you warm it in the microwave, and you give it to him.

4 Q And would he typically have his dinner -- what time does everybody else have dinner?

5 A At 4:00. After 4:00.

6 Q Okay. And his would typically be later because he's not getting back from the
7 conference room?

8 A Correct.

9 Q Okay.

10 Was it -- can you recall other inmates that got their meals from a similar kind of prepackaged
11 arrangement, whether it's kosher or some other restriction? Was that common or uncommon?

12 A In the SHU, nobody else had that, only Epstein, that I can recall.

13 Q Okay.

14 And what can you recall about your interaction, if there was one, with Epstein when you
15 brought him his dinner? Did he -- did you say anything to him?

16 A No. There's a food slot in the door. So Davis put the food in the microwave. And
17 then Davis had the grille key, so he opened the grille. And I, like, opened the food slot, and I gave it
18 to him. He took it, and he said, "Thank you," and I closed the food slot back.

19 Q Got it. So two people travel to bring a meal to a cell?

20 A Right. Because every time, it's always going to be two in the SHU, because somebody
21 has to open the grille.

22 Q So is it right that anytime a guard goes into a tier in the SHU there have to be two
23 guards?

24 A Supposed to.

25 Q Supposed to be.

1 A Correct.

2 Q Okay.

3 All right. I know I mentioned the one inmate that arrived into the SHU, Garcia-Pena. I
4 think you said it, but you have no recollection or knowledge of him as an inmate or his arrival. Is
5 that right?

6 A Correct.

7 Q Okay.

8 And we found a document somewhere that suggested his transfer into the SHU had to do
9 with a tobacco-related infraction. Would that be something that you had seen before, the type of
10 thing that would land an inmate in the SHU?

11 A Correct.

12 Q Okay.

13 Were any -- this is to the best of your memory. Were any of the cells in the SHU -- how
14 about just in L tier, if you can recall -- empty that night? Or in the whole SHU? Did every cell have
15 at least one inmate?

16 A To the best of my recollection, I think everybody had one except Epstein.

17 Q Can you say that one more time for me?

18 A To the best of my recollection, I think everybody had one except Epstein.

19 Q Meaning everybody had a --

20 A A cellmate.

21 Q -- cellmate except Epstein?

22 A Correct.

23 Q So, to the best of your recollection, Epstein was the only person alone in his cell in the
24 entire SHU that night?

25 A To the best of my recollection, yes.

1 Q And you have no recollection of any of your colleagues or yourself having any kind of
2 conversation -- because that would look even more out of the ordinary, that there's only one inmate
3 alone and it's Epstein. There was no conversation about that?

4 A No. It's -- if it wasn't Epstein and it was another inmate alone -- it's not uncommon,
5 though, if they're alone, because people leave all the time to go back to general population or people
6 get released.

7 So the one inmate is not, like, suspicious, like, if I saw one person in a cell. It just happened
8 to be him, but it wouldn't have raised suspicion, just to be clear.

9 Q And I'm just thinking out loud, but --

10 A Uh-huh.

11 Q -- if six people left the SHU that day, it's possible that not every cell had -- because you
12 would never have a cell with three inmates in the SHU, right?

13 A Right. No.

14 Q Okay. So it's possible that there may have been some other cell somewhere in the
15 SHU --

16 A Probably, that they didn't have one, but I can't recall who or if, at this present time.

17 Q I understand.

18 With respect to the 10:00 p.m. count, there's some question in the IG report about the extent
19 to which you or your colleagues conducted that count. We know that there were movements
20 around that time and some debate about whether that is officially part of the count or not.

21 A Uh-huh.

22 Q From your point of view, sitting here today, did you conduct the 10:00 p.m. count?

23 A From my point of view, sitting here today, I conducted the 10:00 p.m. count improperly,
24 because it was done by myself.

25 Q What do you recall -- can you describe your recollection of conducting that 10:00 p.m.

1 count for us? What do you remember about what you did and around when you did it?

2 A I entered every tier and counted the inmates.

3 Epstein doesn't sleep on his bed; he sleeps on the floor. He puts the mattress on the floor.

4 So, when you're conducting a count, you look in the window of each tier and you count. I
5 went up and down every tier, and then I counted, by myself.

6 Q And did you fill out a count slip?

7 A Yes.

8 Q And there was some mention in the IG report that that all may have occurred, you
9 know, around 10:30, after the official count had been cleared, the 10:00 p.m. count, by Control. Is
10 that possible, from your point of view?

11 A About the count slip?

12 Q Yeah, that your counting may have occurred maybe around 10:30, when the Control,
13 Central Control, had already cleared the paperwork.

14 A Oh, that -- I don't know.

15 [Discussion off the record.]

16 Ms. Noel. So, just to clarify, the starting count time is at 10:00, but you're not -- it's an
17 institutional count. So, on the other units, they're waiting for internal to come and count with
18 them. So the count would never be cleared, like, directly at 10:00, because you're going through
19 the whole building, going to each unit, for everybody to count, and you're waiting on them.

20 So the count -- the count time is at 10:00, but you're not necessarily -- so you're in the vicinity
21 of after 10:00, counting. It could be 10:15. It could be 10:30. And then after the whole building
22 has counted, then they would have to clear the count.

23 I don't know anything about them clearing the count before I counted.

24 [REDACTED]:

25 Q Thank you.

1 And the 10:00 p.m. count slip I think said "73 + --

2 A "+ 1."

3 Q -- 1"? Do you have any knowledge of why it said that?

4 A So, to the best of my recollection, just like I said earlier, I wasn't aware that Reyes wasn't
5 coming back.

6 I know, like, when somebody leaves, they're supposed to be on an out count. And I guess
7 that's how they documented a -- on the count slip. So, if you're on the out count, now you're
8 putting "+ 1," indicating that there's an out count.

9 But for some reason that night, I think at some point in time the count couldn't clear, because
10 he didn't come back. So they had to -- Control had to call me to tell me the count -- to have the
11 count clear.

12 Q Do you recall whether or not it was actually you who wrote the "+ 1"? Because there's
13 a question that it might've been down in Control.

14 A Yeah. I'm not -- I can't remember.

15 Q Okay.

16 A quick one on the C- -- CPAP machine? Am I saying that right?

17 A Yes.

18 Q I think I heard you mention, but I just wanted to confirm, the best that you can recall,
19 Epstein could have grabbed that cord --

20 A Correct.

21 Q -- which was out in the hallway, and snaked it into his own cell. Is that right?

22 A Correct.

23 Q Okay.

24 I've got one more before we break for this round. And I'm going to introduce minority
25 exhibit B.

1 [Noel Minority Exhibit B
2 was marked for identification.]

3 [REDACTED]:

4 Q This is an article. You do not have to read the whole article. Maybe just scanning the
5 second page and third page might be helpful.

6 For the court reporter, this is a CBS News article titled, "Who Entered Epstein's Jail Tier the
7 Night of His Death?" And the article is dated February 6th of 2026.

8 And I'm just going to, whenever you're ready, bring your attention to the second and third
9 pages of the article.

10 A Okay.

11 Q So there's a chart here, you can see, on the second page; it's called "FBI Analysis of
12 Video Footage." That's the FBI trying to figure out, based on that one recording SHU camera, kind
13 of what happened when and who was going where.

14 You can see, at 10:39, it's highlighted here that, quote, "A flash or orange" -- I think that
15 probably was supposed to be "of orange" --

16 A Uh-huh.

17 Q -- "looks to be going up the L Tier stairs - could possibly be an inmate escorted up to that
18 Tier."

19 And then, if you flip to the next page, there's another chart. This is where the IG did their
20 best to figure it out.

21 And, again, for 10:39, here it says, quote, "A flash of orange can be seen going up the stairs of
22 L tier. Inmates are currently on lockdown, it is possible someone is carrying inmate linen or bedding
23 up the stairs."

24 A Uh-huh.

25 Q Both agencies agree that, in the 2 minutes before, 2 minutes after, it seems like

1 somebody is moving around the SHU.

2 We took a look at the video ourselves. It's hard to make out; it's blurry. But, from our
3 point of view, it seems likely that this was part of your movements around the time of the 10:00 p.m.
4 count. It seems possible to us that that orange may be just you carrying something up the stairs to
5 L Tier.

6 From your point of view, do you know whether that was you at the 10:39 marker going up to
7 L Tier?

8 A So, after I would've conducted the 10:00 p.m. count, where I started on that tier
9 first -- like, if you watch the video, I'm going the opposite way, and I ended at the left tier -- I never
10 went back up to L Tier after that again.

11 I never distributed anything orange, whether linen, clothing. Everything in the SHU also is
12 orange. Like, linen, clothes, shoes -- everything is orange. I never distributed linen the entire time
13 I worked at MCC to any inmate at all.

14 And I never went back up the tier, nor did I carry anything up the tier, nor did I enter the tier
15 after that time that I did the count.

16 Q Is it possible that that 10:39 movement is part of you doing the count?

17 A But I started there first.

18 Q And what do you mean by -- started where?

19 A So, like, L -- the double tiers, and then going to the next one in the middle, and then
20 going to the other one, I started on L, working my way this way.

21 So I think, to the best of my recollection, this would've been after. Because, on the video, I
22 was walking, like, towards the door. It looked like I walked off camera, and then you see whatever
23 that orange is.

24 There was nobody out in the SHU. There was nobody carrying anything. And I never went
25 back -- after I would've did that 10:00, where you saw me, I never went back to the tier until the

1 morning of -- when it was time for breakfast.

2 Q It sounds like you -- and we also -- but it sounds like you've seen that video as well. Is
3 that right?

4 A Correct.

5 Q Are you as close to 100 percent confident as you can be that that 10:39 flash of orange
6 is not you?

7 A Yeah. I don't know what that is, to be honest. To be very honest, I don't know what
8 it is, who it is. Because I never went back to the tier, and I was never carrying anything orange at
9 all, and I never issued anything orange to anyone in the SHU -- not just only Epstein, just anyone.

10 Q Is it right -- and I think you had said -- at this point in the night, all the inmates in the
11 SHU are locked --

12 A Locked in.

13 Q -- in? Is that --

14 A Correct.

15 Q -- right?

16 A Correct.

17 Q And do you have any memory of anybody somehow leaving their cell for any reason, in
18 terms of the inmates?

19 A Yeah, no. They can't get out.

20 Q And our understanding from the IG report and testimony of not just you but also your
21 colleagues was that, at this point in the night, your two colleagues would have been sleeping.

22 A So --

23 Q Is that right?

24 A -- it would've been one.

25 Q Just one?

1 A It would've been at -- because this was at 10:30. So it would've been just me and
2 Bonhomme (ph).

3 Q Got it. And Bonhomme (ph), I think has been established in the reports, was asleep.

4 A Correct.

5 Q So is it -- from your point of view, is there anybody left it could've been other than you?

6 A No. And it wasn't me.

7 Q Well, that leaves a little bit of a -- a conundrum. Is it possible that it was you?

8 A No, because I didn't go back up the stairs.

9 You see me -- you see me walking off going this way, and then you see that, but I don't know
10 what that is. And like I said before, I never carried -- I didn't go back up the stairs.

11 And you can -- in the video, it is hard to tell, it's very hard to tell it, because you can't really
12 see. Like, remember, his -- his is up. You just see, like, a shadow. I don't know what that
13 shadow could have been. In fact, I want to say that -- I don't know what that is, because I never
14 issued linen or anything at all.

15 Q Is it right that -- it sounds like I hear from you that the person moving around at 10:38,
16 the minute before, and, like, 2 minutes after at 10:41, that is you. Is that right?

17 A Correct.

18 Q Okay.

19 Is it right, then, that, as you sit here today, some other person going up to L Tier at basically
20 the exact same time you're moving around -- you would have noticed that, I would think.

21 A Correct.

22 Q And you did not see anybody go up to L Tier?

23 A No.

24 Q So it kind of feels like either it's you or nobody at all, it's some kind of weird image
25 illusion.

1 A I don't know what the -- what image illusion.

2 And Epstein's cell -- the cell block was never opened after I closed that gate at -- when I went
3 after 10:00 doing that count. Nobody went up there, nor was his door open or the slot or anything.
4 No one went up there.

5 Q Okay.

6 We can go off the record, and that'll do it for this round. Thank you.

7 [Recess.]

8 Ms. Feyerabend. We can go back on the record.

9 BY MS. FEYERABEND:

10 Q I'd like to start by asking you a few followups from topics that we've covered the last
11 2 hours.

12 You had mentioned that you had a personal engagement, and it was -- that came up on
13 August 9th, and it was because of that that you had a shift on August 10th. Is that correct?

14 A Correct.

15 Q So you typically did not have shifts from 12:00 a.m. midnight until 8:00 a.m.?

16 A Correct.

17 Q Why was it -- it was because of your personal engagement.

18 A Right, that I couldn't do the 8:00 to 4:00 and then the 4:00 to 12:00.

19 Q So, just to be clear, you weren't originally assigned a shift on the morning of
20 August 10th?

21 A I wasn't assigned the shift -- for the midnight to 8:00 in the morning?

22 Q Yes.

23 A I was.

24 Q Originally?

25 A Oh, originally, no. I got called and I was mandated on the 9th.

1 Q Okay.

2 And we also mentioned the mandated overtime hours that you had to work. Was there
3 special overtime pay that was included in that?

4 A So it was -- I don't remember if it was time-and-a-half or it was just 16 hours, but the
5 pay would be more because there's overtime.

6 Q Okay. And you don't remember if it was time-and-a-half?

7 A Yeah, no. I don't remember how they do it.

8 Q Okay.

9 Were you paid a salary, or was it an hourly rate?

10 A A salary.

11 Q Okay. And you said, I think, in the first hour, that you don't remember what your
12 salary was.

13 A Yeah, no. So I was a GS-5. So, like, if I google what a GS-5 would've -- the base pay
14 would've been, then I can -- but I don't remember.

15 Q Okay. Thank you.

16 You also mentioned, I think, in the last hour, that Officer Thomas was a, quote, "materials
17 handler"?

18 A Correct.

19 Q What does that mean?

20 A So he is not like a regular correctional officer. He works, like, downstairs -- I don't
21 know -- handling -- so, for example, when the inmates go down to do the laundry, like, he oversees,
22 like, stuff like that. But as far as, like, what his main duties are, I don't know.

23 Q So he would be responsible for laundry?

24 A Like, overseeing the inmates that's doing, like, laundry and other stuff, but I don't -- I'm
25 not sure, like, what exactly.

- 1 Q Okay. And you weren't a materials handler?
- 2 A No.
- 3 Q So I think you mentioned you were never responsible for overseeing laundry. Is that
4 correct?
- 5 A Correct.
- 6 Q Okay.
- 7 I know the minority touched on it as well, the flash of orange that was seen in the video --
- 8 A Uh-huh.
- 9 Q -- but I'd like to also ask you some followups about it.
- 10 A Uh-huh.
- 11 Q Just to be clear, you have seen the video that we're referencing?
- 12 A Yes.
- 13 Q Okay. And you said that it was you that was moving about the SHU station at
14 10:38 p.m.
- 15 A Correct.
- 16 Q Was that the time that you conducted the 10:00 p.m. institutional count?
- 17 A So, as far as what I remember from the video, I conducted the count, I was done, and I
18 went back to the desk. Like, maybe -- I don't know how many minutes in between; then you see me
19 walking off, going this way. But the video you can't see. It cuts off.
- 20 Q Okay.
- 21 A So it would've been, like, minutes apart.
- 22 Q Do you remember where you were walking to?
- 23 A So the only direct -- the only thing that's that way is the door and the bathroom.
- 24 Q Do you remember going to the bathroom at 10:30?
- 25 A I don't recall.

1 Q Do you think that would've been something that you would've done?

2 A I don't recall. Or it could've been -- when I was done, you stick the count slip in the
3 sally port. I could've walked there to stick the count slip. So I'm not sure exactly what -- like,
4 what's the reason that I walked that way.

5 Q So it seems like you were not -- let me back up.

6 Were you at your station at 10:39 p.m. when the flash of orange could be going up the stairs?

7 A No. I was off the camera, that way.

8 Q Could you have seen the L Tier stairs from where you were?

9 A From the door -- if I'm in the -- like I said, I don't remember what I was doing. If I'm in
10 the bathroom and I'm closed, I can't see it. If I just walk to the door, like, where we stick the slip,
11 then I can see the L Tier.

12 Q So, to the best of your recollection, you don't recall whether you could see the L Tier
13 stairs or not?

14 A I could see the L Tier stairs if I'm standing by the door, but because I don't know where I
15 went --

16 Q Okay.

17 A Yeah.

18 Q Okay. So you didn't see in person any sort of flash of orange going up the L Tier stairs?

19 A No.

20 Q You said that you never distributed any linen. Is that correct?

21 A Correct.

22 Q And it's also your testimony that it was not you going up the L Tier stairs?

23 A Correct.

24 Q Okay.

25 Do you have any thoughts or opinions as to what that could've been in the video?

1 A No. I watched it numerous times, and I don't know what it could've been. Only thing
2 I could tell you: Rest assured, it wasn't me.

3 Q Do you think that somebody that was not you or the other OC could have been in the
4 SHU at that time?

5 A It would've been Bonhomme (ph) at that time, me and Bonhomme (ph).

6 Q Could it have been Officer Bonhomme (ph) that was walking up the stairs?

7 A He was sleeping.

8 Q Is it possible it could've been one of your supervisors from downstairs going up in the
9 SHU?

10 A But I would've -- I would've had to let them in, so I would've known if that was the
11 supervisor coming in.

12 Q Okay.

13 You said that -- let me back up. It seems like, in the video, it looks like a person carrying
14 something or walking someone up.

15 A I don't know what it looks -- it just looks like literally -- and the quality is poor. It just
16 looks like a shadow of orange. I never said a person nor somebody carrying. You can't see
17 anything other than a shadow of orange.

18 Q And you said you've seen this video numerous times.

19 A Yes.

20 Q What do you think it is?

21 A I don't have a clue. I think it's a poor video, and I don't know what that is.

22 Q Okay.

23 Was the orange that you saw in the video, that we've all seen in the video, is that a similar
24 shade of orange to the inmate bedding or linens?

25 A I can't -- the quality is poor. Like, it looks like, also, like, light -- like there's some type

1 of, like, light within the orange. So I don't --

2 Q Was there anyone else that could have -- or, was in charge of issuing linens that was not
3 Officer Bonhomme (ph)?

4 A I mean, every correctional officer can issue linen.

5 Mr. Emmer. But, for the record, any individual that would've been transporting the linen to
6 Mr. Epstein's cell, they would've had to be --

7 Ms. Noel. In the SHU.

8 Mr. Emmer. -- in the SHU. And to --

9 Ms. Noel. Correct.

10 Mr. Emmer. -- get into the SHU, you would've --

11 Ms. Noel. Have to let them in.

12 Mr. Emmer. -- had to let them in.

13 Ms. Noel. Correct.

14 BY MS. FEYERABEND:

15 Q When you say "let them in," do you physically open a door? Do you --

16 A So the first door, Control pops the first door. The second door, somebody on the
17 inside would have to let them in.

18 Q Okay. And you don't recall letting anybody in?

19 A No. I did not let anybody in.

20 Q Okay.

21 Let's talk about Mr. Epstein's time while he was in the SHU.

22 A Okay.

23 Q Did you ever have any conversations with Mr. Epstein while he was in the SHU?

24 A The only conversations I had, like I referenced earlier, was when I took the phone from
25 him in the shower, letting him know that the time was up.

1 As far as conversation, that would've been, like, me speaking to him that time. I mean,
2 when I handed the food, I just opened the food tray and I handed it. We didn't have a
3 conversation.

4 [Discussion off the record.]

5 Ms. Noel. Oh, and he asked me to plug in the CPAP machine, and I said, "Okay," and
6 plugged it in.

7 BY MS. FEYERABEND:

8 Q So there were never any conversations --

9 A No, huh-uh.

10 Q -- no back-and-forths --

11 A No.

12 Q -- more than what you just described?

13 A No.

14 Q Did you ever have any interactions with Mr. Epstein besides the ones that you just
15 mentioned?

16 A No. When I count -- when I did the count by myself, when I looked through the
17 window, he raised his hand.

18 Q Signaling that he was there?

19 A Was there, correct. Because he's on the floor. He puts the mattress on the floor.

20 Q Did that seem unusual to you?

21 A No.

22 Q Would other inmates do things like that, put mattresses on the floor?

23 A I mean, in general population, yeah. Especially if their bunk was the top and they don't
24 like to be on the top, they put it on the floor.

25 Mr. Emmer. You mentioned that you didn't have any conversations with Mr. Epstein while

1 he was incarcerated. Are you aware of any staff at MCC that may have had conversations with him
2 that were not related to his incarceration?

3 Ms. Noel. No, not that I know of.

4 BY MS. FEYERABEND:

5 Q Did he, "he" being Mr. Epstein, ever attempt to interact with you?

6 A No.

7 Q Did you witness or hear anything about him trying to interact with any of the other
8 officers?

9 A No.

10 Q Would Mr. Epstein ever write notes in his cell?

11 A I learned that after. I don't -- I didn't physically see him writing a note or was aware at
12 the time that he would write notes. I just know about the notes after.

13 Q So he did write notes in his cell that you learned after the fact?

14 A That I learned after the fact.

15 Q Would inmates in the SHU have access to materials while in their cell?

16 A I'm not sure.

17 Q Would they have any, like, books or pens, notepads, anything like that?

18 A Not that I saw.

19 Q Would -- speaking about SHU inmates, like, generally, would they be allowed or
20 permitted to have such items in their cells?

21 A That I don't know the answer to. I don't know if they're permitted to have it.

22 Q You also said earlier that SHU inmates, in particular, were different than the rest of MCC
23 inmates because they were in their cells for 23 hours --

24 A Correct.

25 Q -- out of the day, and they had 1 hour outside of their cell.

1 What would normally be happening when they would be outside of their cells?

2 A So the 1 hour could be that's where you're going to meet with your attorney. Or
3 there's, like, a little library, like, right there you can go.

4 And I think, in SHU, it's you can't be together. There's, like, separation. So it's not like
5 everybody's out all together. I guess if one's done reading, then the other one could come out, like
6 that.

7 But other than that, I'm not sure of anything else that they do, because it's not done on my
8 shift.

9 Q What shifts is it done on?

10 A I know there's rec, but I don't know if they're allowed to go to rec. I don't know
11 who -- but that would've been a morning shift, like 8:00 to 4:00. I come on at 4:00, so --

12 Q What's the rec?

13 A On the roof, upstairs, outside.

14 Q You said that Mr. Epstein met with his attorney -- attorneys frequently. How did he
15 seem when -- were you ever on shift whenever Mr. Epstein would come back from visiting with his
16 attorneys?

17 A Yes.

18 Q How did he seem when he would come back?

19 A Whoever transported him to the cell, and that's it. Regular.

20 Q Did you ever notice Mr. Epstein doing anything unusual while in his cell other than what
21 you described, him laying the mattress on the floor?

22 A No, because you're not in the cell block constantly, like regular population; only, like, if
23 you're going to conduct a round or a count. But, no, other than the mattress on the floor, I never
24 observed him doing anything.

25 Q I know we touched on this a little bit earlier, but I'm going to ask you again. Were you

1 aware that Mr. Epstein was seeing a MCC psychologist following the July 23rd incident?

2 A When they come into the SHU, they see a psychologist. Him seeing her after, I don't
3 know.

4 Q Okay. So did you ever witness any MCC psychologist conducting clinical followups with
5 Mr. Epstein?

6 A No. And I think that's -- a lot of those things are morning-shift things. On my shift,
7 no, I never seen anyone.

8 Q Because you typically didn't work the midnight --

9 A 8:00 to 4:00. Uh-huh.

10 Q Okay.

11 And just to clarify, I think you said the answer to this is no, but were you, as a SHU officer,
12 responsible for reporting any unusual behaviors by Mr. Epstein or any SHU inmates to the
13 psychologist?

14 A No.

15 Q Was that ever a part of training that was expressed to anyone that you know of?

16 A To report unusual behavior --

17 Q Yes.

18 A -- to a psychologist? No.

19 Q Like, for example, a SHU inmate that was on suicide watch, did you have to make note
20 of that in any way?

21 A No.

22 Q Did you know at the time that Mr. Epstein had signed a new last will and testament on
23 August 9th, 2019?

24 A No.

25 Q To the best of your knowledge and based on what you saw of Mr. Epstein while he was

1 in the SHU and while you worked there, were there any signs that Jeffrey Epstein was suicidal?

2 A No.

3 Q And based on your experience as a correctional officer and what you witnessed
4 firsthand, do you believe that Mr. Epstein killed himself?

5 A Yes.

6 Q Why is that?

7 A Because he was the only one in his cell. Nobody else was in there.

8 Mr. Emmer. During your time with MCC, were suicides a common occurrence?

9 Ms. Noel. My time at MCC was very short, because I was out on an injury for those months,
10 but that was the first one that I was there for.

11 Mr. Emmer. Okay.

12 BY MS. FEYERABEND:

13 Q Was it -- maybe "common" is not the right word, but do you think that there would have
14 been more SHU inmates, in particular, on suicide watch than inmates elsewhere in the MCC?

15 A Correct.

16 Q So MCC psychologists, it wasn't uncommon for them to come in and do, like, followups
17 with SHU inmates. Is that right?

18 A In the morning.

19 Q Okay.

20 I'd like to reference the DOJ OIG report. I know we've talked about it a little bit.

21 It says that on August 8th some MCC New York staff received notice that Mr. Epstein's
22 cellmate would be transferred out of the institution the following day, on August 9th.

23 Did you ever receive any notice that Mr. Epstein's cellmate would be transferred out?

24 A No.

25 Q Were you ever told that Mr. Epstein would be getting a new cellmate?

1 A No.

2 Q Were you ever told why Mr. Epstein's cellmate was being transferred out on
3 August 8th?

4 A No.

5 Q Did you ever personally speak to anyone else that knew that his cellmate was going to
6 be transferred out?

7 A No.

8 Q Were you working that day, on August 8th?

9 A August 8th I think I worked.

10 Q Okay. But you didn't hear any conversations about that?

11 A No.

12 Q Okay.

13 I'd like to move forward to the night of August 9th, as we've been discussing.

14 So you had the workstation in the SHU that you worked at, correct?

15 A Correct.

16 Q Did you have a computer at that station while you worked in the SHU?

17 A Correct.

18 Q Was it a desktop or a laptop?

19 A A desktop.

20 Q How many desktops were there at the station?

21 A To the best of my recollection, two.

22 Q Okay. Was the computer yours, or would you log in to it?

23 A I would log in to it.

24 Q Would you always log in to the same computer?

25 A No, it could be either/or.

- 1 Q Was it a staff-specific log-in that you had to get into the computer?
- 2 A Yes.
- 3 Q So any staff member could log in to any --
- 4 A Computer.
- 5 Q -- computer?
- 6 A Correct.
- 7 Q Would you complete your logs or your reports on the computer?
- 8 A No. On the sheet.
- 9 Q On the sheet. Were there any tasks that you would complete on the computer while
- 10 you were on shift?
- 11 A Not in the SHU.
- 12 Q So, to be clear --
- 13 A No. No.
- 14 Q -- nothing that could've been done --
- 15 A On the computer.
- 16 Q -- work-related?
- 17 A Correct.
- 18 Q Okay.
- 19 Did -- Officer Bonhomme (ph) and Thomas, I'm assuming, also both had computers?
- 20 A Correct.
- 21 Q Did you stay on the same desktop computer for both your August 9th and August 10th
- 22 shift?
- 23 A I don't recall that.
- 24 Q Okay. While you were on shift, were you ever on your computer?
- 25 A Yes.

1 Q What were you doing on your computer?

2 A On the shift from midnight to 8:00 in the morning, I was looking at furniture.

3 Q So non-work-related things.

4 A Correct.

5 Q Were you searching things on Google?

6 A No. To the best of my recollection, no.

7 Q But you said that you were looking at furniture. How were you doing that on your
8 computer?

9 A Typed it in the search. The search doesn't have to be Google. It --

10 Q Sure.

11 A -- could be, like, Bing --

12 Q Any search --

13 A Yeah.

14 Q Any search engine.

15 A Uh-huh.

16 Q Sure. Were you looking at anything else besides furniture while you were on the
17 internet?

18 A So, whenever you open the homepage where the news loads, "Epstein" would be on
19 there, and I'd clicked into it.

20 Q The search function that the -- I believe a forensic report was done of the two
21 desktops --

22 A Uh-huh.

23 Q -- at the SHU station that night. It said that the search function said, quote, "latest on
24 Epstein in jail," end quote.

25 I know you've been asked about this. Did you -- it's your testimony that you didn't physically

1 type in "latest on Epstein in jail"?

2 A Right. I clicked on -- when I seen it load, like, on the news, on the desktop.

3 Q And the desktop -- the forensic report of the desktop says that "latest on Epstein in jail"
4 was searched twice that night, once at 5:42 a.m. and once 10 minutes later -- or, again, 10 minutes
5 later, at 5:52 a.m. Is that correct?

6 A I saw that. I learned of that later on the news. I don't recall doing that; only what I
7 said. Like, if I see it on the homepage, I click on it and read it. But as far as performing a physical
8 search, I don't recall doing that.

9 Q When you first clicked on it, what did you see?

10 A Well, whatever -- I don't remember specifically, but it'd be, like, a headline with him.
11 Like, whatever that headline would say.

12 Q So, at that point, you knew who Jeffrey Epstein was.

13 A At that point, yes.

14 Q And you knew that he was an inmate in the SHU.

15 A Uh-huh.

16 Q Were you curious in any way, anything about Mr. Epstein -- I guess my question is, why
17 did you want to look at what --

18 A Oh, because he's in there. Uh-huh.

19 Q So Mr. Epstein was found deceased -- well, he appeared to be deceased in his cell at
20 6:30 a.m. the morning of August 10th. Is that correct?

21 A That I can't answer, because I didn't find him.

22 Q Okay. Who found Mr. Epstein in his cell?

23 A Thomas.

24 Q Thomas.

25 Can you walk us through, step by step, the events unfolding of discovering Mr. Epstein in his

1 cell?

2 A The breakfast came up. It was time to feed breakfast. Thomas said that he'll do it
3 because, you know, he was sleeping all night.

4 I opened the grille. Epstein is the first cell, so we started there. Thomas -- I'm standing out
5 on the grille. Thomas goes in the cell block, knocks on the door. He doesn't get an
6 answer -- because he would have to come to the door to receive the tray.

7 He knocks again. He doesn't get an answer. He opens the door. When he opens the
8 door, he yelled, "Pass me a cutter."

9 So I hit the body alarm, and I go back down the stairs to go look for a cutter. When you hit
10 the body alarm, the whole building's coming, everybody is coming.

11 When I went back up the stairs, he had already ripped -- because you hear ripping -- and he
12 was doing CPR.

13 Q Officer Thomas was doing CPR.

14 A Correct.

15 Q On Mr. Epstein.

16 A Correct.

17 Q Is that standard protocol?

18 A No.

19 Q Why do you think he started administering CPR?

20 A The standard protocol is he's not supposed to open the door.

21 Q So he decided to open the door.

22 A Correct.

23 Q Did he see Mr. Epstein -- what did he see when he looked in?

24 A Oh, I don't know. We never spoke after the incident, so I don't know what he seen.

25 And from where I'm standing, I can't see.

1 Q At what point did you join him? After he hit the body alarm or before then?

2 A After I hit the body alarm, I go down the stairs to look for the cutter, and then I came
3 back up the stairs. And I could see, like, his feet -- because, by this time, he has him on the floor -- I
4 could see his feet, but I'm still outside on the grille.

5 Mr. Foy. Whose feet?

6 Ms. Noel. Epstein's feet.

7 BY MS. FEYERABEND:

8 Q Epstein's feet on the ground?

9 A Correct.

10 Q Did you ever go into the cell?

11 A No.

12 Q Did you stand outside and wait for help?

13 A Yeah. And help came really fast.

14 Q How fast, would you say?

15 A Like, 5 minutes.

16 Q Okay. And is Officer Thomas standing in the cell at that point?

17 A He's on the floor with him doing CPR.

18 Q The entire 5 minutes?

19 A Correct.

20 Q Did Mr. Epstein respond to the CPR at all?

21 A I don't know.

22 Q Okay.

23 Mr. Grant. You said help arrived in about 5 minutes. Do you know who came as part of
24 that help?

25 Ms. Noel. I don't remember everybody, but Lieutenant Gene (ph) and a whole bunch of

1 other people, but I can't remember exactly who.

2 Mr. Grant. Approximately how many people came?

3 Ms. Noel. Maybe, like, five.

4 Mr. Grant. Thank you.

5 BY MS. FEYERABEND:

6 Q At no point during those events transpiring did you see inside the cell?

7 A Yeah, no.

8 Q Okay. So, just to be clear, you didn't see anything inside the cell that could've been
9 out of place?

10 A No.

11 Q No bedding or linens?

12 A No.

13 Q Did you ever see Mr. Epstein's body?

14 A When they were bringing him out on the stretcher.

15 Q How soon after help arrived were they bringing him out on the stretcher?

16 A Maybe 10 minutes.

17 Q You said he was doing CPR. If either one of you discovers an inmate that requires
18 medical attention, was there any specific procedures that you had to follow?

19 A As far as the SHU goes, I know that you're not supposed to enter a cell alone. You're
20 supposed to, like, call for help and wait for help, and then you can start administering. But as far as
21 that, I don't know.

22 Q Do you know why the procedure is that way?

23 A No, I don't know.

24 Q And you said you never spoke to Mr. --

25 A Thomas?

1 Q -- Thomas afterwards?

2 A No.

3 Q So you don't know why he would have gone in by himself?

4 A Correct.

5 Q After Mr. Epstein's body was removed from the cell -- well, he was pronounced dead at
6 6:39 a.m. that morning -- did you -- what did you do next after that?

7 A Next, I was in the SHU for a while, because everybody was gone, and I was calling to ask,
8 where's my relief? Because, remember, by this time now, it's time for me to leave.

9 Q Sure.

10 A Psychologists came upstairs and asked, did I need to speak to anyone? I said, no.

11 I went downstairs after -- I don't even remember who relieved me, to be honest. And then I
12 went downstairs, and the lieutenant asked me what happened, but I spoke to my union rep, and they
13 told me not to say anything. And I left.

14 Q Who was your union rep?

15 A I can't even think of his name, and I see him in front of me. I can't -- he works in R&D
16 (ph). I'm having a blank.

17 Mr. Foy. Tyrone?

18 Ms. Noel. Huh-uh.

19 BY MS. FEYERABEND:

20 Q That's okay. Was your union rep at MCC when you were talking to him about this?

21 A Yes.

22 Q And why would he say to not talk about it?

23 A I don't -- I guess because the lieutenant was asking me, and that's not, like, protocol. If
24 you want to question me, like, the union rep should be there.

25 Q Did you leave your shift at the normal time, at 8:00 a.m. that morning?

1 A I think it was after 8:00 because there was a lot going on.

2 Q How long after 8:00, do you think?

3 A Maybe a half an hour.

4 Q Okay. Were you ever told anything before you were -- before you left?

5 A No.

6 Q Was that your last-ever shift at MCC?

7 A Correct.

8 Q How soon after your last shift -- so August 10th -- did you answer questions in an
9 interview by MCC about what happened that day?

10 Mr. Foy. That was even after the OIG, right?

11 Ms. Noel. Uh-huh. I'm thinking.

12 Mr. Foy. So it was more than 2 years.

13 Ms. Noel. Yeah. It was a long time, for me.

14 Ms. Feyerabend. About how long, if you had to guess, estimate?

15 Mr. Foy. I'd say more than 2 years, because it was after OIG.

16 Ms. Noel. Like, about 2 years?

17 Ms. Feyerabend. Okay.

18 Mr. Foy. More than.

19 Ms. Noel. More than 2 years.

20 BY MS. FEYERABEND:

21 Q I know we discussed whether -- or, that Officer Thomas was sleeping while on his
22 midnight-to-8:00-a.m. shift, correct?

23 A Correct.

24 Q How long was he sleeping for?

25 A So it varies, 'cause he had went upstairs at one point to 10 South. So I can't really say,

1 like, how long he was sleeping. Pretty much for the, like, duration of the shift. But at one point he
2 left and he went upstairs to 10 South, and then he came back and he went back to sleep.

3 Q Okay.

4 And Officer Bonhomme (ph) on the shift before that, you said -- I think you said that he was
5 sleeping. Is that right?

6 A Correct.

7 Q About how long was he sleeping for?

8 A So he went to sleep towards the last hour -- or, maybe, like, last 2 hours of his shift.

9 Q And that was around the time that you had done your 10:00 p.m. count.

10 A Correct.

11 Q And then we mentioned the 10:38 in the video, you were walking off. Was Officer
12 Bonhomme (ph) asleep for that time?

13 A He was.

14 Q Okay. And at 10:39, when we discussed the flash of orange in the video camera, he
15 would've been asleep then as well?

16 A Correct.

17 Q Okay. Thank you.

18 Were you at any point sleeping on your shift between 4:00 p.m. -- before -- excuse me -- on
19 the night of August 9th or the morning of August 10th?

20 A No.

21 Q I'd like to ask a few more questions about the payments.

22 JPMorgan Chase had reported that you received a total of 12 suspicious cash deposits
23 beginning in April 2018. These were included in the most recent release of the Epstein Files
24 Transparency Act --

25 A Uh-huh.

1 Q -- and there's been lots of reporting since about them.

2 JPMorgan Chase's suspicious activity report in the Epstein files included the \$5,000 cash
3 deposit that we discussed earlier in the first hour, but it also included another 11 deposits from an
4 unknown sender.

5 Cash deposits under \$10,000 usually are not flagged as suspicious. However, they still
6 flagged all of these deposits.

7 Are you familiar with these 12 suspicious deposits that they flagged?

8 A So Chase never informed me of anything suspicious on my account. When you say
9 "unknown sender" -- nobody deposits money in my account. I do. So I don't know who or what
10 could've been an unknown sender.

11 Q So no one else had access to your JPMorgan Chase account.

12 A Correct.

13 Q Just you.

14 A Me. Correct.

15 Q There was also bank records from the DOJ that show that there were seven cash
16 deposits, totaling \$11,880, that began in December 2018.

17 Was that also you that was distributing the cash deposits?

18 A Correct.

19 Q Okay. Is it your testimony today that these cash deposits that were flagged by
20 JPMorgan Chase were sent to you by yourself within your own account?

21 A Not sent. I make the deposit.

22 Q Deposited.

23 A Uh-huh.

24 Q And that none of these cash deposits had anything to do with Jeffrey Epstein or
25 Ghislaine Maxwell?

1 A Correct.

2 Q Thank you.

3 BY MR. EMMER:

4 Q And we discussed that during the first hour -- as far as what you knew about Mr. Epstein
5 when he was incarcerated. It seems at some point you learned that he was a wealthy individual.
6 Is that right?

7 A I mean, I knew he was high-profile.

8 Q Would it be safe to assume that your coworkers at MCC would've known that he was a
9 wealthy individual?

10 A I don't know.

11 Q So my question is, are you aware of Mr. Epstein paying anyone else that was employed
12 by MCC?

13 A No. I'm not aware of that.

14 Q And you had mentioned --

15 Mr. Foy. "Anyone else"?

16 Mr. Emmer. Paying any employee --

17 Mr. Foy. Oh.

18 Mr. Emmer. -- at MCC for anything?

19 Ms. Noel. No.

20 BY MR. EMMER:

21 Q You mentioned earlier that there was medication that Mr. Epstein had in his cell that
22 you didn't know or that -- how he would've had access to. Is that --

23 A Correct.

24 Q -- right? Is it possible that an employee at MCC may have been working with
25 Mr. Epstein to bring in medication for him?

1 A I don't know who that would be.

2 Q Okay.

3 BY MS. FEYERABEND:

4 Q I know we've mentioned this before, but for the record, were there any security
5 cameras in the SHU?

6 A Yes.

7 Q How many security cameras?

8 A That I don't know, how many.

9 Q Okay. Where -- do you know where they would be?

10 A On the tiers.

11 Q On the upper or the lower tier?

12 A There's one on the upper, and I'm not sure if there's one on every tier, but on the tier
13 center.

14 Q When you were working at your station, were you able to see the camera footage from
15 the station?

16 A Like, see where a camera is?

17 Q Typically -- well, maybe not "typically," but -- were you able to see a screen that
18 showed --

19 A Oh, like the -- no.

20 Q -- video surveillance --

21 A Yeah, no.

22 Q -- of the SHU?

23 A No.

24 Q No. Would you ever see the security camera footage?

25 A Never.

- 1 Q Was that handled by other people?
- 2 A I don't know who handled it.
- 3 Q MCC staff?
- 4 A I don't know. I don't --
- 5 Q So you don't know whether MCC hired outside parties to --
- 6 A Right.
- 7 Q -- install --
- 8 A To do --
- 9 Q -- or manage --
- 10 A Yeah. I don't know how that works.
- 11 Q Okay. Did you know how often the MCC upgraded their security camera systems?
- 12 A I don't know.
- 13 Q Do you know whether cameras would often fail or malfunction?
- 14 A That I don't know.
- 15 Q During your time in the SHU, did you ever have any problems with the security cameras
- 16 not working?
- 17 A No.
- 18 Q Did you ever know about the security cameras --
- 19 A Nope.
- 20 Q -- not working? No conversations from other people that --
- 21 A About a camera --
- 22 Q -- you would've heard --
- 23 A No.
- 24 Q Have you ever handled anything related to security camera footage?
- 25 A No.

1 Q Okay.

2 I'm going to reference the DOJ OIG report once more.

3 It said that the MCC security cameras in the SHU failed to record any live footage starting on
4 July 29, 2019, and that this malfunction was not discovered by MCC staff until August 8, 2019. MCC
5 staff, however, then failed to take any action to fix this malfunction. Therefore, the security
6 cameras did not record anything on August 9th or August 10th, the day of Mr. Epstein's death. It
7 did, however, continue to broadcast live feed.

8 It also says -- the report also says that MCC staff obtained the replacement hard drives
9 necessary to repair the security camera system on August 9th but did not complete the repairs to
10 restore recording functionality.

11 I know you mentioned this, but did you know that the security cameras were not --

12 A Working?

13 Q -- working?

14 A No.

15 Q And you don't know who was in charge of making sure that the security camera system
16 was repaired?

17 A No.

18 Q Did you ever speak with anyone about this failure on August 9th or August 10th --

19 A No --

20 Q -- specifically?

21 A -- 'cause I wasn't aware that it wasn't working.

22 Q Okay.

1 [1:32 p.m.]

2 BY MS. FEYERABEND:

3 Q Do you have any reason to believe MCC's staff purposefully or intentionally did not
4 repair the cameras prior to or at the time of Jeffrey Epstein's death?

5 A I don't have any reason to believe, but I don't know.

6 Q Are you aware that the FBI conducted interviews on August 28th and -- 2019 of inmates
7 that were present the night of Jeffrey Epstein's death?

8 A No.

9 Q Are you aware of any allegations that were made by any SHU inmates around that
10 night?

11 A No.

12 Q Did you ever hear that one inmate that was in the SHU, he recounted a series of
13 remarks that he heard the morning after Mr. Epstein's death?

14 A No.

15 Q This inmate recalls hearing the officers shout, breathe, breathe and then he allegedly
16 heard an officer say, Dude, you killed that dude." Have you ever heard anything like that?

17 A No.

18 Q There's also a quote that he said he heard a female guard reply with quote, "if he is
19 dead, we're going to cover it up and he's going to have an alibi, my officers."

20 The inmate also said that the entire wing of the prison overheard these remarks. And after
21 learning that Mr. Epstein had died, the inmates were saying, "Ms. Noel killed Jeffrey."

22 A Never heard of that.

23 Q Did you ever hear any inmates make any accusations about Mr. Epstein's death?

24 A No.

25 Q What's your response, what do you think of these allegations?

1 A Of that?

2 Q Yes.

3 A I mean, I'm not aware of anything like that being said, but they may say anything.

4 Q Thank you.

5 A You're welcome.

6 Q We discussed earlier that you had altered the counts and rounds on the reports. Were
7 you ever criminally charged with falsifying those prison records?

8 A No.

9 Mr. Foy. Altered the accounts? What do you mean "altered"?

10 Ms. Feyerabend. That you signed off that you had completed them when you in fact had
11 not completed them.

12 Mr. Foy. Okay.

13 Ms. Noel. Yeah, no.

14 Ms. Feyerabend. Saying that more counts and rounds were done than were actually done.

15 Ms. Noel. No.

16 Ms. Feyerabend. Were you ever -- I'm sorry, I'm going to back up. Were you ever
17 criminally charged with falsifying BOP records?

18 Ms. Noel. No.

19 Mr. Foy. Yes, you were. You were criminally charged.

20 Ms. Noel. Okay.

21 Mr. Foy. Right? I mean --

22 BY MS. FEYERABEND:

23 Q Were charges brought against you?

24 A Right, yes.

25 Mr. Foy. That's what she's asking.

1 Ms. Noel. Okay, yes.

2 BY MS. FEYERABEND:

3 Q Charges were brought against you for?

4 A Yes.

5 Q How many counts?

6 Mr. Foy. We don't remember.

7 BY MS. FEYERABEND:

8 Q Okay. And what was the result of those charges being brought against you?

9 A Nolle?

10 Mr. Foy. Dismissed.

11 Ms. Noel. It was dismissed.

12 BY MS. FEYERABEND:

13 Q How come it was dismissed?

14 Mr. Foy. Ask the government, they are the ones who dismissed it.

15 Ms. Noel. I read in the report that --

16 [Discussion off the record.]

17 Ms. Noel. So there was a nolle prosecution agreement to dismiss it, and as a result of that, it
18 got dismissed.

19 BY MS. FEYERABEND:

20 Q So just to be clear for the record, you were criminally charged with falsifying BOP
21 records and that case, those charges were dismissed, correct?

22 A Correct.

23 Q Thank you. I think we are wrapping up our hour's worth of questions, but I have just a
24 final question for you. Is there anything that we have not covered or touched on today that you
25 would like to provide the committee in the furtherance of its investigation into the crimes of Jeffrey

1 Epstein and Ghislaine Maxwell?

2 A No.

3 Ms. Feyerabend. I think we can go off the record.

4 [Discussion off the record.]

5 [REDACTED]:

6 Q Ms. Noel just a few more questions for you and then we'll get you on your way.

7 A Thank you.

8 Q When we left off, we were working through the timeline of the night of the 9th, the
9 morning of the 10th. It sounds I think pretty clear but just confirming for us for the -- when we talk
10 about counts for the 12 a.m., 3:00 a.m. and 5:00 a.m. counts, those did not occur. Is that right?

11 A Correct.

12 Q And it sounded from the IG report like maybe around the time of the 12:00 a.m. count
13 or somewhere in that window there was communication with control about adjusting the numbers.
14 You kind of mentioned this earlier, 73 or 72. What is your recollection of that mix-up?

15 A To the best of my recollection, the count couldn't clear because the numbers was off
16 and I think it had to do with that inmate that was not returning. So control basically told me what
17 the number is supposed to be.

18 Q Got it. Were you the one that talked to control?

19 A I honestly don't remember. Could have been.

20 Q All right, great.

21 Mr. Foy. Hold on one second.

22 [Discussion off the record.]

23 [REDACTED]. We can go back on the record.

24 Ms. Noel. So there was no count conducted in the SHU. But upstairs on 10 South, I did
25 count with Adams.

1 [REDACTED]:

2 Q I will -- I've got that as well and I'll get to that in the timeline. Thank you.

3 A Okay.

4 Q As far as rounds, maybe just between your arrival at 4:00 p.m. and your 10:00 p.m.
5 count, did any rounds occur in that period?

6 A A few of them. As far as a number, I don't know.

7 Q Any recollection of around what time or around how many or you're just not sure?

8 A Not sure.

9 Q Okay. And then after the 10:00 or 10:30, whenever that counting occurred, through to
10 let's say delivering breakfast, were there rounds that occurred then?

11 A No.

12 Q There was a sign, a physical sign described in the IG report it sounds like it was posted to
13 the SHU officer one of these SHU officer computers. And the sign said, I'll just read it, it's one
14 sentence, mandatory rounds must be conducted every 30 minutes on Epstein as per God. And it
15 sounded like at least a day and an evening watch officers agreed that that sign was on the computer
16 on that day and night. Do you have a recollection of ever seeing that sign?

17 A I don't recall the sign.

18 Q Do you recall -- even if it wasn't that night ever seeing that sign?

19 A Sign, no.

20 Q It would be tough to answer, but do you have any sense on what the "as per God"
21 would be a reference to?

22 A No.

23 Q You talked a little bit earlier about the MCC way, could I just ask your opinion, it sounds
24 like a lot of the issues we described today were widespread, lack of training, understaffed, overtime.
25 What is your perspective? Do you think MCC was well-run from a management point of view?

1 A No.

2 Q What's your perspective on the extent to which it was either facing challenges or was
3 poorly run or needed to be fixed in certain ways?

4 A I later learned a lot of things that wasn't working. Like, for example, the camera
5 system that would have been, like, an upper management thing. But as far as the shortages, it kind
6 of makes it hard, because sometimes management have less of to work with. And when you have
7 less of to work with, you're doing things that's not supposed to be done, because sometimes you
8 have one staff member working two units. You can't be in two places at one time, but there's just
9 no manpower.

10 And as far as what I learned also is this has been an ongoing issue and the union has asked for
11 help or asked for more staff, but they didn't get it. So I don't know that it was poorly ran because
12 they just didn't want to do their job, but it was poorly ran for a lot of -- lack of.

13 Q Thank you.

14 A You're welcome.

15 Q I think you had said in your statement with the IG and I think a moment ago, that you
16 went up to 10 south to help that guard do his or her count?

17 A Count.

18 Q Counts. Maybe at both 3:00 and 5:00 a.m. Is that correct.

19 A Correct.

20 Q Is that -- was that ordinary in your experience?

21 A Yes.

22 Q And why would that be?

23 A Because shortages again, there's one officer up there. So usually because there is two
24 in the SHU, somebody will cross count with the 10 south officer.

25 Q Would it have been normal for there only to be one officer up in 10 south, or was that

1 an understaffing problem as well? Was that supposed to be two officers in 10 south?

2 A I know it's supposed to be two in 10 south.

3 Q But it was one that night?

4 A It was one all the time.

5 Q Got it. Did that officer in 10 south come ask you for help doing his or her, I don't know,
6 counts?

7 A No.

8 Q How did that end up happening that you were helping that officer do counts?

9 A Because that's just -- I just know that somebody from 9 south goes up to 10 south to
10 count.

11 Q Presumably, ordinarily, somebody in SHU is also doing that midnight count and these
12 other counts around the same time.

13 A Correct.

14 Q What ended up being the difference as to why one was happening and the other was
15 not?

16 A So clearly, I wanted to count because I went to 10 south, but Thomas was sleeping. So
17 I didn't count 9 south, but I went to 10 south to count his unit because he wanted to count. He
18 was -- so I counted up there and came back down to my unit.

19 Q Got it. He was awake as far as you could tell?

20 A Exactly.

21 Q A lieutenant visited the SHU around 4:00 a.m. to perform -- a round or -- what do you
22 call it when it is lieutenant, is that a count or a round?

23 A To be honest, I don't know. I just know she comes and she's supposed to do a
24 walkthrough, but I don't know as far as for the lieutenant what they classify it as.

25 Q Do you recall was that around 4:00 a.m.?

1 A Around that time.

2 Q And is it right that that lieutenant went up and did a count or a round in 10 south but
3 not actually in the SHU? Is that correct?

4 A To be honest, I know she didn't do it in the SHU, but I can't recall if she did it in 10 south.

5 Q Around 5:30 that morning there was some kind of switch where Mr. Thomas went to
6 relieve the 10 south guard and that guard went to get food. Is that right?

7 A Correct.

8 Q Okay. Is it right that there was some kind of confusion about whether or not control
9 had given permission for all of that to happen?

10 A It was the lieutenant. So 10 south called, and I answered. And he said that the
11 lieutenant said to relieve him to go get food. So I didn't believe him, so I called the lieutenant's
12 office to ask did she say that. But by the time I called the lieutenant's office, the lieutenant that was
13 on staff was -- they didn't answer or wasn't there. So when I asked Lieutenant Gene, he said he
14 doesn't know anything about that because he would have been just been coming on and Thomas
15 said he will go.

16 Q I understand. If you remember, what was it that caused you to not believe that 10
17 south guard in the first place?

18 A Because it's not -- you're not supposed to go outside to get food.

19 Q A couple of questions on those Google searches that were being discussed last round.
20 The time stamp on those was around 5:42 a.m., 5:52 a.m. You described a little bit about clicking a
21 pop up. The records that were in these DOJ files seemed to indicate an actual Google search for
22 latest on Epstein in jail. But they also had a Google search for the latest on Omar Amanat, who is
23 some kind of famous person who was at MCC at the time. Is it possible that you googled both of
24 those searches just out of curiosity because these are high-profile people?

25 A So for Amanat, she actually asked me, like, this is in general population, like, Oh, do you

1 know who I am? And I'm, like, no. And he's, like -- and he's, like, oh, he's, like, the producer, a
2 filmmaker for whomever. So him, I remember that I googled him because he was telling me who he
3 was but --

4 Q Got it, I actually never heard of him until I was getting ready for this, but apparently he's
5 famous.

6 So if you recall running the Amanat Google search and then those records also show the
7 furniture searches that you were you talking about?

8 A Uh-huh.

9 Q And then sandwiched in between there is Google search latest on Epstein in jail. Is it
10 possible that you also ran that Google search?

11 A Possibly, but to the best of my recollection, I don't ever remember -- I know what
12 Amanat, because we had a conversation. Like, he actually was like do you know who I am? But as
13 far as Epstein, I don't remember actually physically because every time the news page loads, he's on
14 there so you just click into it and read.

15 Q But is it right that after the July 23rd incident maybe, like, you and others kind of knew
16 at that point who Jeffrey Epstein was and that he was high profile in some way. Is that right?

17 A Correct.

18 Q So by that night of the 9th, you were aware that Epstein was a famous person?

19 A Correct.

20 Q Okay. As far as the timeline, before we come into discovery of Mr. Epstein's body,
21 which you've done previously, but I'll just ask a few more. But before we get to that part, is there
22 anything else that happened, stands out in your mind that night that we have not already talked
23 about?

24 A No.

25 Q You described discovering, along with Thomas, Mr. Epstein in his cell. Is it around 6:30

- 1 a.m. more or less for delivering breakfast. Is that right?
- 2 A Correct.
- 3 Q And Thomas' is the one up at the cell door and you're back at the grille?
- 4 A Correct.
- 5 Q Thomas gets no response from Epstein, so he goes into the cell and that's how it starts.
- 6 Is that right?
- 7 A Correct.
- 8 Q Did Thomas then call for a cutter?
- 9 A Yes.
- 10 Q Did you then run back to get cutter?
- 11 A Yes.
- 12 Q And is that when you also pressed the medical button?
- 13 A Yeah, I hit the body alarm first and then went to go find the cutter.
- 14 Q Did you hear Thomas cutting the fabric at all -- you never saw that happen, right?
- 15 A No.
- 16 Q Did you hear a ripping?
- 17 A I heard a rip.
- 18 Q You did. Is that after -- did you return with a cutter, hand it to Thomas and then there
- 19 was a rip, or did he cut with something that he already had?
- 20 A No, I returned to ask him where's the cutter, because I can't find it, but -- and that's
- 21 when I heard the rip.
- 22 Q Got it. So he had already some kind of -- do you know what he had?
- 23 A I don't know if he had anything, because I can't see.
- 24 Q Did you see Thomas lower Epstein to the floor and start the CPR?
- 25 A So I can't see the way, like, it is. I can't see the lowering, but I imagine he lowered him

1 because you see his legs coming like this way. So I could only see, like, his legs.

2 Q Were you able to see whether Epstein looked blue or had any signs of a fight or any
3 other scratches or things like that?

4 A Not from the door. When he was coming out on the stretcher, then I could see him
5 fully.

6 Q Do you have a recollection of when you saw him come out on the stretcher, did he look
7 discolored?

8 A His face.

9 Q What color approximately?

10 A Blue.

11 Q Blue? Did you see anything reflecting wounds or scratches I guess other than on his
12 neck?

13 A No, I didn't even see his neck, he just looked blue.

14 Q Did -- as far as you remember, did Thomas ever say, we're going to be in so much
15 trouble?

16 A Yes.

17 Q What's your opinion of why he said that? I mean, it sort of speaks for itself, but what
18 was your -- what was going through your mind at that moment?

19 A At that moment, when he said that, I didn't understand what he was referring to,
20 because in my mind, I was like, how are we going to be in so much trouble if we didn't do anything to
21 him.

22 Q Do you remember responding to Thomas?

23 A I didn't respond to him.

24 Q Were you aware in this moment that Epstein had been found hanging or were you not
25 sure what was going on?

1 A Yeah, no, I don't know he found him.

2 Q Did you ever actually go into Epstein's cell?

3 A No.

4 Q And you may have said this, I'm sorry if you did, approximately how quickly did medical
5 and his support staff arrive after Thomas first discovered Epstein?

6 A Oh, they arrived like 5 minutes?

7 Q The morning watch operations lieutenant told the IG that when he arrived, you told
8 him, quote, "Epstein hung himself." Do you recall that happening?

9 A No.

10 Q What were you doing once all the medical personnel arrived to start working on
11 Epstein?

12 A Standing at the bottom of the tier.

13 Q Do you recall inmates saying anything to you as this was all unfolding?

14 A They wasn't saying anything to me. They were just chanting because it's like
15 everybody's in the cellblock so it was echoes. They were chanting, but not speaking to me.

16 Q Do you remember what they were chanting?

17 A Oh, y'all in so much trouble.

18 Q Did an inmate or the inmates or any individual inmate say you killed him?

19 A No, never.

20 Q At least one inmate said that they heard an MCC staff member say that if Epstein was
21 dead, it would be covered up. Did you say or hear anything like that?

22 A They did not say and never heard anything like that.

23 Q And you left the MCC once Epstein had been removed and that was your last --

24 A Time at MCC, correct.

25 Q A couple of miscellaneous MCC-related questions. Were guards required to search

1 inmates' cells in the SHU?

2 A Yes.

3 Q How often would that typically happen?

4 A As far as how often it happened, I just don't remember.

5 Q Was it pretty -- you know, every shift that you were on, did you see that happen at least
6 once or it was once maybe once every couple of days, somebody would do a cell search?

7 A It didn't happen on my shift.

8 Q That day or at all when you worked in the SHU?

9 A At all that I can remember on the 4:00 to 12:00, I don't remember any cell searches.

10 Q Do you recall ever conducting a search of Mr. Epstein's cell?

11 A Never.

12 Q Do you recall any of your colleagues ever conducting a search Mr. Epstein's cell?

13 A No.

14 Q Do you recall either knowing or hearing colleagues discuss Epstein having extra linens in
15 his cell?

16 A No.

17 Q Do you -- would it have been typical for inmates to be provided with extra linens? Is
18 that something they could ask for?

19 A In the SHU, no.

20 Q Do you recall anybody ever, or I guess I should say this, do you recall ever noticing as
21 you look through the windows into Epstein's cell noticing more than usual amounts of sheets or
22 clothes?

23 A No.

24 Q I think you had given a quote at some point about the CPAP machine that other inmates
25 would not have been given something like that, but Epstein was getting special treatment, quote,

1 "because it's Epstein." Is that still your point of view on his treatment, as you sit here today?

2 A I mean I've never seen any other inmate with a CPAP machine.

3 Q Do you have any theory or did you have a belief at the time as to why Epstein was
4 getting what seemed like special treatment?

5 A No.

6 Q There was some discussion about a note that was found in Epstein's cell after he died.
7 And it read, redacted name, left me in a locked shower for 1 hour. Noel sent me burnt food, giant
8 bugs crawling over my hands. No fun. Do you have any -- before you read about it in the
9 newspapers, but back at the time, did you have any knowledge of that note existing?

10 A No. I actually saw that on 60 minutes. I never even saw in that the paper.

11 Q Do you recall Epstein ever complaining to you about the food that you brought him?

12 A No.

13 Q Did Epstein ever complain to you about being left in a locked shower for an hour?

14 A No.

15 Q Did you ever hear of Epstein complaining about bugs in the SHU?

16 A No.

17 Q You were asked I think earlier about the possibility of Epstein having a pen in his cell to
18 write a note like that. Would inmates in the SHU have been allowed to have pens in their cells?

19 A So out of the allowed part, I'm not sure if they are allowed, to be honest. I don't know.

20 Q Would it have been surprising or unusual if you looked through somebody's cell door
21 and saw them using a pen in the cell?

22 A Probably not.

23 Q It would not have seemed unusual or strange?

24 A No.

25 Q There's a suggestion that on August 9th and 10th, Epstein was not in the cell to which he

1 was technically assigned. He was assigned in the SHU, but some other cell and some other tier.

2 Do you recall ever even knowing that or hearing that?

3 A I never heard that.

4 Q Do inmates or did inmates in the SHU have ID cards on the door to their cell?

5 A No.

6 Q How would you all, as guards, typically have that knowledge of who is supposed to be in
7 which cell when you start doing your counts?

8 A A roster.

9 Q And the roster has cell assignments?

10 A Correct.

11 Q But you have no recollection of ever looking at the roster and saying, oh, Epstein I think
12 is actually supposed to be in that one?

13 A No.

14 Q With respect to the cameras in the SHU, it's been discussed only one of them was
15 recording in the way that it should have been. But the others were, it sounds like, livestreaming
16 footage. Would you -- let's start with would you personally have been watching the livestreams of
17 the other cameras in the SHU?

18 A No.

19 Q Do you know who would ordinarily have been watching those livestreams?

20 A No.

21 Q Would you have any way of knowing whether anybody was monitoring those
22 livestreams throughout that night?

23 A I don't know.

24 Q After Epstein's death, a Bureau of Prisons after action team was set up to look into the
25 death. Have you ever heard of an after action team, either in this case or generally?

1 A No, never heard of it.

2 Q So that team never contacted you?

3 A No.

4 Q It sounds like at least one inmate reported what he thought was an unusual amount of
5 document shredding going on by that after action team. Do you have any knowledge of Bureau
6 staff shredding documents in the weeks following Epstein's death?

7 A I don't know.

8 Q Meaning you've never heard of that, or you don't remember whether or not --

9 A No, so I don't know if that took place, because my last day was the 10th so I don't know.

10 Q Did anybody ever mention anything like that to you?

11 A No.

12 Q Would you have had any knowledge of what the what the typical practice in MCC would
13 be in terms of shredding documents? Is that something that you would see every week?

14 A I never saw it at all.

15 Q There was an email in the DOJ files release, it was addressed to Jeffrey Epstein's
16 brother, and it was from somebody with an address of eskadrad1@gmail.com. And this person
17 claims that you and Michael Thomas were paid \$6,500 so you would not visit prisoners and therefore
18 a man named Michael Rose entered Jeffrey Epstein's prison cell and strangled him. Have you ever
19 met or heard of anybody named Michael Rose?

20 A No.

21 Q As far as you know, is the allegation I just mentioned true or untrue?

22 A As far as I know, untrue.

23 Q And have you ever heard of the sender with an email address, eskadrad1@gmail.com?

24 A Never heard of it.

25 Q All right. So nobody, to your knowledge, paid you or Mr. Thomas, to your knowledge,

1 money not to do your rounds?

2 A For me, nobody ever paid me anything in reference to Mr. Epstein or anything
3 surrounding him at all.

4 Q Just a few miscellaneous ones left. You had mentioned injury leave earlier in 2019.
5 What was the approximate date range for that?

6 A March of 2019, and I came back in June of 2019.

7 Q I think it was reflected in the DOJ release that somewhere during that interval, you
8 traveled to China. Is that correct?

9 A I did go to China, but I don't remember when I went to China. I think that was in April.

10 Q And I think that's what the record suggested as well. I would assume, but I'm just
11 asking, that was a personal trip, personal tourism?

12 A I actually was going to Thailand, I just had to connect in China.

13 Q Got it. Did that trip or any conversations you had on that trip relate in any way to your
14 official duties at the MCC?

15 A No.

16 Q Did that trip, or any conversations you had on that trip relate in any way to Jeffrey
17 Epstein or Ghislaine Maxwell?

18 A No.

19 Q I think we have a member who would also like to ask a few questions. I'm going to
20 turn it over.

21 Ms. Stansbury. Thank you so much for being here today. I know it has been a long day.

22 I want to just follow up on a few of the question lines that folks were already asked about just
23 for a little more detail for the record. So I know you've already answered a lot of questions about
24 the night of. And you've answered the questions about things that were out of protocol, special
25 treatment, you mentioned the CPAP. In one of the questions that has been raised in commentary

1 about this case is whether or not somebody wished harm on Jeffrey Epstein. Is there anything that
2 you witnessed inside of the jail that would indicate that somebody wished him harm?

3 Ms. Noel. No.

4 Ms. Stansbury. Anything from jail management, anything from people who worked there?

5 Ms. Noel. No.

6 Ms. Stansbury. Anyone -- any of the other cell mates or people who were in the area he was
7 being kept?

8 Ms. Noel. No.

9 Ms. Stansbury. Okay. And you mentioned that your last day was on the 10th, that was the
10 day --

11 Ms. Noel. Of the incident.

12 Ms. Stansbury. Of the incident. And I'm sorry I had to step out for part of the questions,
13 but my understanding is that you relayed that your firing was directly related to the night check and
14 how it was completed. Is that right?

15 Ms. Noel. To everything that took place.

16 Ms. Stansbury. Did you feel that your firing was standard for something like that occurring,
17 or did you feel like you were being retaliated against or was there anything unusual about your
18 firing?

19 Ms. Noel. I don't know if I'd use those terms. I feel like --

20 Ms. Stansbury. What terms would you use?

21 Ms. Noel. I feel like --

22 Mr. Foy. Before you do, let me talk to you about that.

23 [REDACTED]. Off the record for a moment, please.

24 [Discussion off the record.]

25 [REDACTED]. We can go back on the record.

1 Ms. Noel. So because it was Jeffrey Epstein, that is the sole reason why I got fired.
2 Because all these other names and people that have been investigated have done the exact same
3 thing, and they still work for the Bureau and they are promoted in the Bureau. But because I
4 happened to work the day and it was Mr. Epstein, that's why I got fired. So the term I would use is
5 unfair.

6 Ms. Stansbury. And just to kind of follow up a little bit on that, do you feel like you were
7 being targeted because of that, or that they were trying to silence you or do you feel at all like you
8 were singled out because you knew something? I hear you say it was unfair, but tell us your
9 perception of why you, why they fired you and not others?

10 Ms. Noel. Because I was the one, me and Thomas was the specific ones working the shift.
11 But typically for not conducting rounds and counts, everybody else gets suspended, that is the
12 punishment for that.

13 Ms. Stansbury. And did the person or persons who told you you were fired or that this was
14 happening provide any explanation to you at the time about why you were being fired? And if so,
15 what did they say?

16 Ms. Noel. They did, it was in a report, but I can't remember verbatim, like, what exactly was
17 said. But, like, failure to follow policies and rules of the Federal Bureau of Prisons that lieutenants
18 and everybody else they don't follow.

19 Ms. Stansbury. Do you feel like the unfairness was unusual in the sense of, like, they fired
20 you right away that day, you were singled out.

21 Mr. Foy. That's not what happened.

22 Ms. Stansbury. Oh, oh.

23 Mr. Foy. She wasn't fired right away that day.

24 Ms. Stansbury. Oh, I'm sorry, I misunderstood. I'm sorry.

25 Ms. Noel. I was placed on an administrative leave right away after that for a while.

1 Ms. Stansbury. I see.

2 Ms. Noel. And then after November '19, 2019, once --

3 Ms. Stansbury. It was in November. I'm sorry.

4 Ms. Noel. Once I got indicted, then I was no longer on administrative leave. But then it
5 was following 2 years after -- more than 2 years that I actually got terminated?

6 Ms. Stansbury. I see, okay. I'm sorry if I had the sequencing incorrect. That's my bad.

7 Ms. Noel. No.

8 Ms. Stansbury. But going back to the question of now knowing that's your timeline, you said
9 just now it was unfair. But do you also think it was unusual, like, something about your termination
10 was different than how it was normally handled inside the jail, someone being terminated for a
11 report, not reporting and the conduct?

12 Ms. Noel. Well, us because it was Epstein.

13 Ms. Stansbury. Okay.

14 Ms. Noel. But if was not Epstein and it was another inmate, we would have been still
15 working at the Bureau of Prisons.

16 Ms. Stansbury. Do you have a feeling or a thought about why, aside from the fact that it
17 was just a famous person?

18 Ms. Noel. Yeah, no.

19 Ms. Stansbury. No? Okay.

20 I know that you talked a little bit about the financial transfers that people have raised the
21 deposits that happened. And I understand that you answered some questions earlier and just to go
22 back over them, as I understand that you stated earlier that they were deposits that you made
23 yourself?

24 Ms. Noel. Correct.

25 Ms. Stansbury. Can you tell us a little bit about those? What was the source of the money

1 for those deposits?

2 Ms. Noel. So my source of my deposits --

3 Mr. Foy. Wait, wait, wait. Okay.

4 [REDACTED]. We will go off the record.

5 [Discussion off the record.]

6 [REDACTED]. We can go back on the record.

7 Ms. Noel. The source of the money that, as I mentioned earlier, has nothing do with
8 Epstein, anyone related to Epstein, involved with Epstein. No one has ever approached, offered,
9 asked. Anything that's concerning my money has nothing to go with Epstein at all. It's solely me
10 and my personal savings.

11 Ms. Stansbury. Got it.

12 And I understand that you're not disclosing the source here, but I would like to offer to you, if
13 you would like, if you would like to put anything in the record, the official record that helps explain
14 where that funding came from to help clarify that for the public. We want to make sure you have
15 that opportunity. And if you don't choose it, that's okay too. I just -- we're letting you know that
16 that's an option.

17 Mr. Foy. It's clear enough so you're good.

18 Ms. Stansbury. Okay. The trip that you took afterwards, was personal in nature. You
19 said you went to Thailand. Was that a trip that you financed yourself?

20 Ms. Noel. Correct.

21 Ms. Stansbury. And it was just a vacation?

22 Ms. Noel. Correct.

23 Ms. Stansbury. And then I think just my final question, is, is there -- other than things you've
24 already shared in the room and have been specifically asked about, is there anything weird about
25 that night that stands out in your brain that you have otherwise shared that you feel is important to

1 be in the record?

2 Ms. Noel. No.

3 Ms. Stansbury. Okay, all right. Thank you. Thank you for being here.

4 Ms. Noel. You're welcome.

5 [REDACTED]: Is there anything else you'd like to share with the committee about the
6 circumstances of Mr. Epstein's death?

7 Ms. Noel. No.

8 [REDACTED]: And I think you said earlier it is your personal belief that Mr. Epstein took his
9 own life. Is that right?

10 Ms. Noel. Correct.

11 [REDACTED]: With that, thank you for your time today. We can go off the record.

12 [Discussion off the record.]

13 [Whereupon, at 2:16 p.m., the interview was adjourned.]

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Certificate of Deponent/Interviewee

I have read the foregoing ____ pages, which contain the correct transcript of the answers made by me to the questions therein recorded.

Witness Name

Date