

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

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JEAN AZOR-EL, et al.

Plaintiffs,

VS.

1:20-cv-03650-KPF

CITY OF NEW YORK, et al.,

Defendants.

-----x

VOLUME II

THE ORAL DEPOSITION of CHIEF BECKY SCOTT, produced,
sworn and examined on behalf of the Plaintiffs,
pursuant to Notice to Take Deposition, on Thursday,
May 27, 2021, beginning at 1:00 p.m. Eastern Time,
via videoconference, before me,

R. PATRICK TATE
CERTIFIED COURT REPORTER
HERITAGE REPORTING

a Certified Court Reporter, in a certain cause now
pending before the United States District Court,
Southern District of New York, wherein the parties
are as hereinbefore indicated.

A P P E A R A N C E S:

For the Plaintiffs:

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(Appearing via teleconference)

<p>Page 137</p> <p>1 APPEARANCES CONTINUED</p> <p>2 For the Defendant Department of Correction:</p> <p>3 New York City Department of Correction</p> <p>4 7520 Astoria Boulevard, Suite 305</p> <p>5 East Elmhurst, New York 11370</p> <p>6 By David Thayer, Esq.</p> <p>7 (Appearing via teleconference)</p> <p>8 ALSO PRESENT: Julia Gokhberg</p> <p>9</p> <p>10</p> <p>11 EXAMINATION INDEX</p> <p>12 Examination by Mr. Keenan..... 138</p> <p>13</p> <p>14</p> <p>15</p> <p>16</p> <p>17</p> <p>18</p> <p>19</p> <p>20</p> <p>21</p> <p>22</p> <p>23</p> <p>24</p> <p>25</p>	<p>Page 139</p> <p>1 need to get there.</p> <p>2 (Pause.)</p> <p>3 Q (By Mr. Keenan) Chief Scott, we're here to</p> <p>4 talk again about mask mandates and discipline,</p> <p>5 at DOC facilities during COVID-19. I want to</p> <p>6 start off by asking you something we learned</p> <p>7 about yesterday talking with Deputy</p> <p>8 Commissioner Feeney, and that is the</p> <p>9 promulgation of a new policy on masks dated</p> <p>10 May 5th, 2021. Are you aware of that policy?</p> <p>11 A I'm sure I've seen it. I don't -- I'm not sure I</p> <p>12 remember all the details.</p> <p>13 Q Okay. I'll tell you, it's already been marked as</p> <p>14 Deposition Exhibit 129 in this case and I'm going</p> <p>15 to go ahead and share it on the screen. Give me</p> <p>16 just a second.</p> <p>17 (Pause.)</p> <p>18 Q (By Mr. Keenan) So Chief Scott, you should see</p> <p>19 on the screen now a directive from the</p> <p>20 Department of Correction dated May 5th, 2021;</p> <p>21 can you see that?</p> <p>22 A Yes.</p> <p>23 Q Okay. And just for the record, this is a</p> <p>24 directive given a classification number of</p> <p>25 2269R-B?</p>
<p>Page 138</p> <p>1 PROCEEDINGS</p> <p>2 Thereupon,</p> <p>3 CHIEF BECKY SCOTT,</p> <p>4 was called as a witness and, having been duly</p> <p>5 cautioned and sworn, was examined and testified</p> <p>6 upon her oath as follows:</p> <p>7 EXAMINATION</p> <p>8 BY MR. KEENAN:</p> <p>9 Q Good afternoon, Chief Scott, how are you today?</p> <p>10 A Hi. Good afternoon.</p> <p>11 Q We are here to resume your deposition that we</p> <p>12 commenced a couple of weeks back, and -- just to</p> <p>13 ask you a few questions. I'll note at the</p> <p>14 beginning, it sounds like there's some background</p> <p>15 noise; it sound a bit like a bird chirping or</p> <p>16 something like that.</p> <p>17 A Yeah, you're correct, and I unfortunately can't</p> <p>18 do anything about it.</p> <p>19 Q Okay.</p> <p>20 A Sorry. But it is rather loud.</p> <p>21 Q If it continues, we might need to swear in the</p> <p>22 bird and see what it has to say about all of</p> <p>23 this.</p> <p>24 MR. KEENAN: But, Pat, I'm confident</p> <p>25 you can do that for us but hopefully we won't</p>	<p>Page 140</p> <p>1 A Yes.</p> <p>2 Q Why don't you take a moment to read through this</p> <p>3 and tell me if you recognize it.</p> <p>4 A Yes, I do.</p> <p>5 Q You do recognize this document?</p> <p>6 A Yes.</p> <p>7 Q Okay. And can you summarize for us what this</p> <p>8 document is?</p> <p>9 A It's the policy governing our requirement to wear</p> <p>10 masks.</p> <p>11 Q Were you involved in the implementation of this</p> <p>12 policy or in the formulation of this policy?</p> <p>13 A No.</p> <p>14 Q Does this now state what the policy is of the</p> <p>15 Department of Correction regarding masks?</p> <p>16 A Yes.</p> <p>17 Q And the policy took effect on May 5, correct?</p> <p>18 A This version, yes.</p> <p>19 Q What, if anything, has the City done to train</p> <p>20 correction officers and staff about this new</p> <p>21 policy and in particular about the fact that</p> <p>22 masks are now mandatory even if you're able to</p> <p>23 maintain six feet of distance unless you're</p> <p>24 eating or you're medically unable to do it?</p> <p>25 A So whenever a policy is issued, it's read at roll</p>

<p style="text-align: right;">Page 141</p> <p>1 call to all the staff for a certain amount of</p> <p>2 consecutive roll calls, and that's the way the</p> <p>3 messaging is issued to staff.</p> <p>4 Q How many roll calls was this directive read at?</p> <p>5 A I cannot say. I can't confirm exactly how many.</p> <p>6 Typically it's 21 roll calls. But again, I don't</p> <p>7 know exactly what this one was.</p> <p>8 Q Illustrate for me what that means, reading it at</p> <p>9 roll call. I can guess at what that means but</p> <p>10 having never worked at Rikers I don't really</p> <p>11 know, so give me a sense.</p> <p>12 A So every tour, everyone that's scheduled to work</p> <p>13 for that tour, has to report to a central</p> <p>14 location. And at that location, they will get</p> <p>15 their attendance taken, that they're there and</p> <p>16 they're present for that tour, they will have the</p> <p>17 equipment that they're required to use checked by</p> <p>18 the supervisor, and then any announcements or</p> <p>19 dissemination of information is given to staff</p> <p>20 during that time by a supervisor.</p> <p>21 Q How long do roll calls typically last?</p> <p>22 A It really varies based on what the agenda of the</p> <p>23 roll call is, who's speaking at the roll calls,</p> <p>24 and how many announcements or teletypes or how</p> <p>25 much they have to cover in giving out</p>	<p style="text-align: right;">Page 143</p> <p>1 Q Would you agree with me that this change in</p> <p>2 policy is a -- is a significant change in policy?</p> <p>3 A I'm sorry, you're referring to this directive?</p> <p>4 Q Yes.</p> <p>5 A So do we have the first version up, do you have</p> <p>6 that so we can --</p> <p>7 Q I can bring it up.</p> <p>8 MR. KEENAN: Julia, do you have what I</p> <p>9 think is Exhibit 34 in this case?</p> <p>10 MS. GOKHBERG: Yes, I could pull it up.</p> <p>11 MR. KEENAN: Okay, I think that's a</p> <p>12 March 2021 --</p> <p>13 MS. GOKHBERG: I have it up now but I'm</p> <p>14 not sure whether you can see it with your screen</p> <p>15 being shared.</p> <p>16 MR. KEENAN: Okay, I'll stop my</p> <p>17 screen-share. Okay, here we go.</p> <p>18 A So the highlighted difference is what's bold and</p> <p>19 underlined --</p> <p>20 Q (By Mr. Keenan) Right.</p> <p>21 A -- so the difference that I see here is that in</p> <p>22 the first version dated the 4th, it talks about</p> <p>23 wearing two face coverings, with it underlined,</p> <p>24 and it also contains similar information</p> <p>25 regarding the requirements to wear a mask and the</p>
<p style="text-align: right;">Page 142</p> <p>1 information, and it also depends on how many</p> <p>2 people are scheduled for that tour. It varies</p> <p>3 facility to facility, tour to tour.</p> <p>4 Q Now, in a roll call, if -- I assume roll call</p> <p>5 happens at the very beginning a shift, right, or</p> <p>6 very beginning of a tour?</p> <p>7 A Yes.</p> <p>8 Q So if the other tour has already ended, who is</p> <p>9 basically staffing the duty stations while the</p> <p>10 people on the incoming tour are doing roll call?</p> <p>11 A So if you're on a post, you don't leave that post</p> <p>12 until the person at roll call attends that actual</p> <p>13 post. So you have -- it depends on what that</p> <p>14 post is. Not all posts are the same, but for the</p> <p>15 most part, you would be relieved by someone in</p> <p>16 person.</p> <p>17 Q Other than -- when something is read at roll</p> <p>18 call, is it supposed to be read verbatim from</p> <p>19 beginning to end?</p> <p>20 A Depends on length of the message. Staff can also</p> <p>21 be provided with a copy if they're required, they</p> <p>22 can also give instructions that they can see</p> <p>23 their supervisor for additional information if</p> <p>24 it's necessary, if it's a lot of information to</p> <p>25 give out.</p>	<p style="text-align: right;">Page 144</p> <p>1 policy A1.</p> <p>2 Q So I -- I guess maybe if we can do it this way.</p> <p>3 Right here we're looking at Exhibit 34, which is</p> <p>4 the March 4, 2021, statement of policy, correct?</p> <p>5 A Right, yes, correct.</p> <p>6 Q And to summarize what this policy does is this is</p> <p>7 the March 4th version, it says that it's the</p> <p>8 policy of the department that if you're able to</p> <p>9 medically tolerate it, you have to wear a mask</p> <p>10 unless you can maintain a distance of six feet or</p> <p>11 more from other people; it says that, right?</p> <p>12 A Well, yeah, so it says that you're required --</p> <p>13 staff members able to medically tolerate a mask,</p> <p>14 wear the face mask when interacting with others</p> <p>15 and members of the public in indoor settings</p> <p>16 even when it's possible to remain six feet apart.</p> <p>17 Q Well, are you kind of reblending two things</p> <p>18 together?</p> <p>19 A I was just reading what it says here, in number</p> <p>20 two.</p> <p>21 Q Okay, yeah, and that -- so what you were just</p> <p>22 reading under subsection two and subsection small</p> <p>23 Roman -- or small Roman one under subsection two</p> <p>24 is that it's strongly recommended that you wear a</p> <p>25 face mask when indoors even if you're able to</p>

<p style="text-align: right;">Page 145</p> <p>1 maintain six feet distance, that's what it says, 2 right? 3 A Yes. 4 Q Okay. So in the March 4th version, wearing mask 5 at all times indoors is a strong recommendation 6 but it's not a policy requirement, correct? 7 A That's -- the wording in the policy states that 8 it's strongly recommended, yes, that's what it 9 states. 10 Q Right. And in addition, there's a strong 11 recommendation of wearing two face coverings and 12 then it goes on to make a distinction on the next 13 page, between -- it made some options and it says 14 use a cloth face covering and a disposable mask, 15 do not use two disposable masks, and if you're 16 wearing a KN95 you should wear it alone, correct? 17 A Yes. 18 Q And it says don't use a face covering with an 19 exhalation valve, correct? 20 A Correct. 21 Q So now, Julia, if you can pull down that screen 22 share I'm going to bring back up the directive 23 from May. So now we're back in Exhibit 129, 24 which is the May 5th directive, and it states 25 here on the May 5th directive that it is</p>	<p style="text-align: right;">Page 147</p> <p>1 Q Okay. So would you agree with me that this new 2 requirement that you have to wear a mask at all 3 times in a shared indoor sitting workspace is a 4 significant change in policy? 5 A It's a change. 6 Q Okay. An important enough change to make sure 7 that correction officers fully understand it and 8 follow it? 9 A I'm sorry, say that again. 10 Q Would you agree that it is very important to 11 ensure that correction officers fully understand 12 and follow this change in policy? 13 A Yes. 14 Q Okay. Up here, we've got some markers for 15 whether this directive is approved for web 16 posting and what distribution it is on. Can you 17 tell us what Distribution A means? 18 A That it's not approved. This is categorized in 19 where the information would be shared. So 20 Distribution A would be shared in one type of 21 venue whether it's going to be posted on the web 22 or not; other category would be if it's going to 23 be shared to the population. So it just 24 categorizes how the information will be shared. 25 Q Okay. So can you tell me what the difference --</p>
<p style="text-align: right;">Page 146</p> <p>1 superseding the March 4th directive, correct? 2 A Yes. 3 Q So in other words, it takes the place of the 4 March 4th directive completely, correct? 5 A Yes. 6 Q All right. So here -- the material change here 7 is that -- the material change here is that you 8 have to wear a mask at all times when you're in a 9 shared indoor sitting space in which another 10 person is physically present, and you can't be 11 separated by a closed door, right, that's what it 12 says? 13 A Yes. 14 Q Okay. And then, and then even if you're not in a 15 shared indoor sitting workspace, you have to wear 16 a mask if you're not able to maintain six feet 17 distance, correct? 18 A Yes. 19 Q And then there's an exception if you're eating or 20 drinking or if you're not able to medically 21 tolerate a mask, correct? 22 A Yes. 23 Q And this clarifies that the mask has to cover 24 your mouth and nose at all times, correct? 25 A Yes.</p>	<p style="text-align: right;">Page 148</p> <p>1 let's talk about -- it seems explanatory enough 2 to me, whether something is approved for web 3 posting yes or no, so I might ask you about that 4 in a moment. But let's focus on the distribution 5 category. Can you tell me what all the different 6 distribution categories are? 7 A I don't have that information in front of me. 8 Q Do you know what Distribution A means? 9 A I don't have -- I don't have the exact criteria 10 in front of me. I know that there are 11 differences but I don't have the actual outline 12 in front of me. 13 Q Okay. Approved for web posting, it says no. Do 14 you know why this was not approved for web 15 posting or why a policy like this wouldn't be 16 approved for web posting? 17 A No. 18 Q What does it mean when a policy or directive is 19 approved for web posting? 20 A That it would be accessible on the website. 21 Q On the public website or only to staff members? 22 A We don't have -- I don't have an 23 only-for-staff-members website. 24 Q All right. Do you know why this wouldn't -- why 25 this wouldn't be posted on the web?</p>

<p style="text-align: right;">Page 149</p> <p>1 A No, I don't know.</p> <p>2 Q Was in policy ever printed off and distributed to</p> <p>3 staff members in paper form?</p> <p>4 A If a staff member asked to have a physical copy,</p> <p>5 they can. Typically, they're stored and staff</p> <p>6 can access it on the computer, but it's not</p> <p>7 always printed out for each and every person.</p> <p>8 But if they request it, they can have it.</p> <p>9 Q But it's not being preprinted and say handed out,</p> <p>10 right?</p> <p>11 A No, not to my knowledge.</p> <p>12 Q Is the -- is the department posting a copy of</p> <p>13 this directive in, say, command stations or</p> <p>14 workstations that correction officers frequent,</p> <p>15 break rooms, things like that?</p> <p>16 A I'm not sure.</p> <p>17 Q You haven't seen it posted anywhere, have you?</p> <p>18 A No, I haven't this directive, but we have had</p> <p>19 several different posters with instructions to</p> <p>20 staff regarding wearing the mask, to both staff</p> <p>21 and to incarcerated individuals.</p> <p>22 Q And what do those posters say?</p> <p>23 A That there are different ones that have come out</p> <p>24 since this has happened. I don't have any in</p> <p>25 front of me, but they have been issued to</p>	<p style="text-align: right;">Page 151</p> <p>1 yet did last time we met, I don't think.</p> <p>2 A Right, I don't have any records to speak to what</p> <p>3 discipline has been as a result of this version,</p> <p>4 I don't have that in front of me.</p> <p>5 Q Okay. And what we would be basically talking</p> <p>6 about is the last three weeks. You don't have</p> <p>7 any data or any information on discipline from</p> <p>8 the last three weeks?</p> <p>9 A No.</p> <p>10 Q The information that you did already produce to</p> <p>11 us through the City's counsel, where did that</p> <p>12 information come from, where was it filed?</p> <p>13 A So in the event that we look at different things</p> <p>14 that occur with regards to staff, whether it's a</p> <p>15 video or any type of review of anything and we</p> <p>16 see an occasion where a staff member isn't</p> <p>17 wearing their mask and that will be noted, and</p> <p>18 the facility will address it and that's where</p> <p>19 that information came from.</p> <p>20 It's another process that we have for</p> <p>21 reviewing other things. And in that, that's how</p> <p>22 that information came about from my office.</p> <p>23 MR. KEENAN: Why don't we ask it this</p> <p>24 way. Julia, can you pull up the AMKC corrective</p> <p>25 action spreadsheet? I think it would be</p>
<p style="text-align: right;">Page 150</p> <p>1 facilities to remind staff of the requirements to</p> <p>2 wear masks.</p> <p>3 Q Let's talk about enforcement of this May 5 policy</p> <p>4 or directive. I'll just use the term "policy"</p> <p>5 interchangeably with "directive," okay?</p> <p>6 A Okay.</p> <p>7 Q So this May 5th policy that we see on Exhibit 129</p> <p>8 here, have you done anything to enforce the new</p> <p>9 mandate that people wear masks at all times in</p> <p>10 shared indoor sitting work spaces except when</p> <p>11 they're exempted from it?</p> <p>12 A If I'm aware of it or if I'm present, I will</p> <p>13 remind staff that they're required to wear it.</p> <p>14 If I'm touring or in the facilities and someone</p> <p>15 doesn't have it properly on their face, I'll</p> <p>16 remind them. I don't personally assign any type</p> <p>17 of administrative action for it, no.</p> <p>18 Q Okay. Are you aware of anyone being disciplined</p> <p>19 for violating this directive since it was</p> <p>20 implemented on May 5?</p> <p>21 A I -- I think we covered this the last time we</p> <p>22 spoke, we shared some information regarding</p> <p>23 discipline.</p> <p>24 Q Well, yeah, that information wasn't current as to</p> <p>25 this policy. This policy hadn't been promulgated</p>	<p style="text-align: right;">Page 152</p> <p>1 Exhibit 38.</p> <p>2 MS. GOKHBERG: Yes, just give me a</p> <p>3 moment.</p> <p>4 MR. KEENAN: Sure.</p> <p>5 Q (By Mr. Keenan) Okay. So why don't we go to</p> <p>6 March of 2021. So we've got one person listed</p> <p>7 in AMKC, one person listed, [REDACTED], as</p> <p>8 getting a counseling in AMKC in March, correct?</p> <p>9 A Yes.</p> <p>10 Q And by the way how many correction officers are</p> <p>11 assigned to AMKC all tours combined?</p> <p>12 A Over nine hundred.</p> <p>13 Q Would you knowledge to me that in March of 2021,</p> <p>14 it is likely that more than one officer was not</p> <p>15 properly complying with the mask policy at AMKC?</p> <p>16 A Likely, that's possible.</p> <p>17 Q Next let's look at April of 2021. Okay, no -- no</p> <p>18 corrective actions recorded for mask</p> <p>19 noncompliance in April of 2021, correct?</p> <p>20 A Correct.</p> <p>21 Q Now we go to May 2021, correct? And of course at</p> <p>22 the time you produced this to us, I don't think</p> <p>23 May 2021 had come yet. I think we're still in</p> <p>24 April. I'll invite Chuck and David to correct me</p> <p>25 if I'm wrong, but I assume that this was just a</p>

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1 spreadsheet that was there basically as a
2 template to fill in if needed once you get to
3 May 2021, correct?
4 A Correct.
5 Q So here's my question: Do you have a version of
6 this spreadsheet that is current up through now?
7 A I would have to check with my staff.
8 Q Okay. Have they been recording things up the now
9 or did they stop recording them at a certain
10 point?
11 A No, we haven't stopped. But if we wanted to get
12 an up-to-date reporting, I would have to check
13 with them, my staff.
14 Q Are they supposed to update it currently like on
15 a daily basis as discipline happens, they're
16 supposed to put it in?
17 A It's not a requirement anywhere that it has to be
18 done daily. This report is generated from
19 another report.
20 Q Okay.
21 A So it's not something that's done every day
22 because the other report that this information
23 comes from isn't done every day.
24 Q Okay. How frequently is that report that this
25 spreadsheet is derived from?

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1 A I would have to -- I would have to -- I'm not --
2 I don't do this personally, so I would have to
3 confer with my team.
4 Q Okay. Is it done -- is it done on at least a
5 weekly basis?
6 A Again, I would have to get those details from my
7 team. I don't do this report personally.
8 Q Okay. You are not personally aware and you have
9 seen no records to suggest or state that any
10 corrective action has been taken against an
11 officer regarding mask compliance from May 5th
12 forward, correct?
13 A So that information I wouldn't -- so I think I
14 need to clear up exactly when this would come to
15 my attention.
16 Q Okay.
17 A In my role as a bureau chief of facility
18 operations, day-to-day corrective action wouldn't
19 necessarily rise to my level of attention, unless
20 it was something that was exceptional. So
21 day-to-day discipline, routine discipline,
22 corrective interviews, counseling, the reporting
23 of that wouldn't be something that I would look
24 at day-to-day.
25 Q How frequently would you look at it?

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1 A As frequently as I would need it, as requested.
2 Q Well, do you have a standard practice, did you
3 make it your practice to look at corrective
4 action from time to time?
5 A Again, it depends on what I'm looking for in that
6 particular time; whether we're talking about
7 compliance with masks, we're talking about use of
8 force. I mean, I think it's important to
9 remember I'm responsible for all facility
10 operations. So it's quite lengthy.
11 Q You have not -- when is the last time you
12 reviewed any information about imposition of
13 corrective action for masks?
14 A You're asking me when the last time I've seen a
15 report?
16 Q Yes, or reviewed any information about it.
17 A When you say -- I'm not clear on "information,"
18 so are you asking me when is the last time I
19 reviewed a report, a document?
20 Q Yes.
21 A So we asked about May and I thought I answered
22 that. We talked about when is the last time I
23 looked at -- did I look at May, and I explained
24 that this report is generated from another
25 report. So this is a routine reporting system.

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1 And unless it rises to the level of
2 something specific, it's not something I would
3 look at day-to-day; it would be as necessary.
4 Q And that's what, that's what I'm asking Chief
5 Scott. Given that you don't look at it
6 day-to-day, when is the last time you looked at
7 it?
8 A At this document, at this report?
9 Q Yes.
10 A I have not looked at this report for May, I don't
11 have -- I thought I answered that.
12 Q Okay, I just want -- I appreciate you clarifying
13 that. Maybe I missed that the first time, but I
14 appreciate you making that clarification. So you
15 have not looked at any version of corrective
16 actions for PPE any spreadsheet or report on that
17 for May, correct?
18 A I just want to be clear that the reporting of
19 corrective action in the form of counseling and
20 corrective interviews would not rise to the rank
21 of a bureau chief.
22 Q All right.
23 A So you're asking me would I know if a correction
24 officer within the Department of Correction
25 received a counseling, would I know that. And

<p style="text-align: right;">Page 157</p> <p>1 I'm saying in my role as a bureau chief, I would</p> <p>2 not. That would rise to the level of internally</p> <p>3 within the command. So there's a chain of</p> <p>4 command, right?</p> <p>5 Q Sure.</p> <p>6 A So you have a correction officer. That person is</p> <p>7 supervised by a captain who's supervised by</p> <p>8 appear ATW who's supervised by a deputy warden</p> <p>9 who's supervised by a warden who's supervised by</p> <p>10 me. So those are the levels where that would lie</p> <p>11 on routine corrective action.</p> <p>12 For it to rise to the level of a bureau</p> <p>13 chief it's usually an exceptional event and I</p> <p>14 would not be involved in day-to-day facility</p> <p>15 level corrective action regarding masks and other</p> <p>16 issues.</p> <p>17 Q And I fully understand and appreciate that. And</p> <p>18 I understand your explanation of why you wouldn't</p> <p>19 necessarily be looking at these records</p> <p>20 regularly, et cetera. What I'm trying to</p> <p>21 understand is this spreadsheet comes from</p> <p>22 somewhere and similar spreadsheets come from</p> <p>23 somewhere. So who keeps custody of these</p> <p>24 spreadsheets and who updates them?</p> <p>25 A So from what I understand, this report was</p>	<p style="text-align: right;">Page 159</p> <p>1 would update this at the conclusion of discovery.</p> <p>2 MR. KEENAN: Okay. I mean, it seems to</p> <p>3 me pretty material information for our joint</p> <p>4 letter, so if there's a way of getting some sense</p> <p>5 so --</p> <p>6 MR. ORSLAND: Of course.</p> <p>7 MR. KEENAN: Yeah.</p> <p>8 MR. ORSLAND: -- we were always</p> <p>9 intending on updating this -- this week.</p> <p>10 MR. KEENAN: Super. Thanks.</p> <p>11 Q (By Mr. Keenan) All right. Chief Scott --</p> <p>12 MR. KEENAN: And we can take this down</p> <p>13 Julia. Thank you.</p> <p>14 Q (By Mr. Keenan) Chief Scott, one of the things</p> <p>15 we talked about at the last session of your</p> <p>16 deposition was formal discipline, so the</p> <p>17 memorandum of complaint process. And I think</p> <p>18 you testified at the time that you were not</p> <p>19 aware of any records that show any correction</p> <p>20 officer being subject to a memorandum of</p> <p>21 complaint disciplinary process for masks,</p> <p>22 correct?</p> <p>23 A Correct.</p> <p>24 Q And does that remain the case today?</p> <p>25 A Yes.</p>
<p style="text-align: right;">Page 158</p> <p>1 generated based on a request from -- to prepare</p> <p>2 for this.</p> <p>3 Q For this case. So in other words, these</p> <p>4 spreadsheets, Exhibit 38 and the spreadsheets</p> <p>5 like them that we've looked at at the prior</p> <p>6 session of your deposition, are spreadsheets that</p> <p>7 were compiled for purposes of this case, based on</p> <p>8 other records the department has; is that</p> <p>9 correct?</p> <p>10 A Yes.</p> <p>11 Q Okay. I understand. And so since the last</p> <p>12 deposition or the last session of your</p> <p>13 deposition, no -- it sounds like but I invite</p> <p>14 anyone to correct me if I'm wrong, it sounds like</p> <p>15 no one has gone in and supplemented those</p> <p>16 spreadsheets with additional information about</p> <p>17 any additional disciplinary actions; is that</p> <p>18 correct?</p> <p>19 A Yes.</p> <p>20 MR. KEENAN: Okay. Chuck, David, we</p> <p>21 might want to, if there have been any additional</p> <p>22 disciplinary actions, I think we'll want to know</p> <p>23 about those.</p> <p>24 MR. ORSLAND: David, this is Chuck. I</p> <p>25 think we said in our discovery responses that we</p>	<p style="text-align: right;">Page 160</p> <p>1 Q Okay. So to this day, you're not aware of any</p> <p>2 and have not seen any records indicating any</p> <p>3 officer being subject to the formal memorandum of</p> <p>4 complaint process for masks, correct?</p> <p>5 A Correct.</p> <p>6 Q Chief Scott, are you familiar with the compliance</p> <p>7 and safety center?</p> <p>8 A Yes.</p> <p>9 Q And can you summarize what the compliance and</p> <p>10 safety center was?</p> <p>11 A It was a team of staff members dedicated to</p> <p>12 supporting staff in the facilities by monitoring</p> <p>13 and observing via Genetec what was happening and</p> <p>14 would reach out to the person and identify if</p> <p>15 there was an issue, to bring the issue to the</p> <p>16 attention of the staff on the post and the goal</p> <p>17 of correcting the issue.</p> <p>18 Q And I know we talked about it in several</p> <p>19 depositions in this case, but just to make it</p> <p>20 clear, Genetec is the system of monitoring</p> <p>21 cameras throughout the Rikers and Vernon C. Bain</p> <p>22 complex, correct?</p> <p>23 A Correct.</p> <p>24 Q And there's thousands of Genetec cameras, right?</p> <p>25 A Correct.</p>

<p style="text-align: right;">Page 161</p> <p>1 Q And in the compliance and safety center, officers 2 or present 24 hours a day seven days a week, 3 correct? 4 A Correct. 5 Q And they were able to monitor and pipe into live 6 video from Genetec cameras throughout Rikers and 7 the Vernon C. Bain Center at any time in real 8 time, correct? 9 A Correct. 10 Q And if they observed somebody not wearing a mask 11 or otherwise not complying with the directive, 12 they would be able to call down to that post 13 immediately, talk with the officer, and basically 14 tell them, Hey, get your mask on, right? 15 A Correct. 16 Q It's our understanding that the compliance and 17 safety center was terminated or phased out on or 18 about March 30 of this year; is that correct? 19 A I believe so, yes. 20 Q When the Compliance and Safety Center was in 21 operation, do you think it was effective -- let 22 me ask a clearer question. Was the Compliance 23 and Safety Center effective at improving mask 24 compliance? 25 A I don't know.</p>	<p style="text-align: right;">Page 163</p> <p>1 someone not in compliance with that policy and 2 you highlight it to them, the goal would be that 3 they would correct that behavior. 4 Q And just by definition, if there are fewer people 5 watching for mask compliance and fewer people in 6 a position to observe it, there are going to be 7 fewer opportunities to remind and coax people to 8 put their masks on, right? 9 A I don't necessarily connect the dots that way, 10 but I can see how you would. 11 Q Tell me how you do or don't connect those dots. 12 A So I think that overall human behavior is 13 something that's always going to have outliers; 14 you're going to have those like have you in the 15 community, where you have a messaging campaign 16 nationwide to encourage to us do it, to do it 17 willfully, that has been the position of the 18 agency as well, we want everyone to do it 19 willfully. 20 And to suggest that because we don't 21 have a team in place to watch you we will 22 eliminate or reduce that effectiveness, I don't 23 connect the dots that way. I think the overall 24 culture combined with the messaging in society 25 will be consistent. And whether or not that unit</p>
<p style="text-align: right;">Page 162</p> <p>1 Q Was it a valuable program; was it a useful 2 program? 3 A I would say yes, it was useful. Any resource to 4 support the staff I find to be useful and that 5 was the goal of the unit to just assist 6 correction officers on the posts where they made 7 observations to call and speak with that person 8 and highlight what they observed, and I think 9 that is useful. 10 Q Okay. One of the things that the City seems to 11 have stressed is its belief in voluntary 12 compliance and reminders to correction officers 13 about the importance of wearing masks, true? 14 A Yes. 15 Q Would you agree with me that if what you're 16 striving for is basically positive peer pressure 17 reminders to voluntarily comply, that having a 18 central post where compliance can be monitored by 19 video at all times is a valuable tool in 20 encouraging compliance? 21 A Regarding compliance to remind staff to use 22 masks? 23 Q Yes. 24 A Would that be useful? Absolutely. I believe if 25 you -- that was the whole objective. If you see</p>	<p style="text-align: right;">Page 164</p> <p>1 is in place, it will not eliminate that from 2 happening. 3 So that's where I don't connect the 4 dots to where if this team doesn't exist, somehow 5 we'll have less compliance for masks. I don't -- 6 I don't agree with that. 7 Q Well, I wonder -- I wonder if we're conflating 8 two things, though, because I -- my question 9 isn't is there any tool that can completely force 10 absolute 100 percent compliance, I think 11 everybody would agree with your observation about 12 human behavior that there will be always some 13 outliers, there will always be some incorrigible 14 people who are going to break the rules no matter 15 what. 16 The goal of any enforcement program or 17 compliance program should be to increase the 18 level of compliance, correct? 19 A Yes. 20 Q Okay. And you've spent your entire career in law 21 enforcement, right? 22 A I had some other jobs but I don't want to talk 23 about it. 24 Q You have spent a very large portion of your 25 career in law enforcement, right?</p>

<p style="text-align: right;">Page 165</p> <p>1 A Yes. Yes.</p> <p>2 Q Decades in law enforcement?</p> <p>3 A I think you want to share my age for some reason.</p> <p>4 I think you're trying to get me to say how old I</p> <p>5 am.</p> <p>6 Q Just --</p> <p>7 A You said decades.</p> <p>8 Q Have you been in law enforcement for decades?</p> <p>9 A Yes, sir, I confess. So I do understand your</p> <p>10 point. I don't necessarily agree with the</p> <p>11 conclusion and how you come about that</p> <p>12 conclusion. So I just think we have just a</p> <p>13 professional difference here.</p> <p>14 But the goal is the same. And I think</p> <p>15 we agree that there are staff members that like</p> <p>16 you described are just those individuals that are</p> <p>17 different and they're not going to do it the way</p> <p>18 they should. And our goal here in the DOC</p> <p>19 everyone is responsible to ensure that staff are</p> <p>20 compliant, period.</p> <p>21 Q And the more people are working to ensure staff</p> <p>22 are compliant, the more likely you are to get a</p> <p>23 higher level of compliance, right?</p> <p>24 A I answered that.</p> <p>25 Q Well, do you agree with what I just said?</p>	<p style="text-align: right;">Page 167</p> <p>1 because of that unit, we have reduced compliance.</p> <p>2 Q What do you think is helpful in increasing</p> <p>3 compliance?</p> <p>4 A Education. The same tools that we've used for</p> <p>5 the public is the same tools that we use. It's</p> <p>6 for your safety and others, it's to protect</p> <p>7 yourself and others. It's community compliance.</p> <p>8 It's not about enforcement and discipline. It's</p> <p>9 about you being responsible and thinking of</p> <p>10 yourself and others --</p> <p>11 Q Okay.</p> <p>12 A -- and wellness, so education is key.</p> <p>13 Q And to that point, would you agree with me that</p> <p>14 positive peer pressure and the more people hear</p> <p>15 the message that they ought to wear masks, the</p> <p>16 more likely they are to wear them?</p> <p>17 A And I will say that the messaging has not changed</p> <p>18 as there's no correlation between compliance</p> <p>19 because of that unit and whether or not that unit</p> <p>20 exists you will see less compliance.</p> <p>21 Q Do you think the unit was not effective in</p> <p>22 increasing mask --</p> <p>23 A I don't have anything to support that.</p> <p>24 Q All right. Now that -- nowadays, what is DO C</p> <p>25 doing to ensure compliance with the mask mandate</p>
<p style="text-align: right;">Page 166</p> <p>1 A No, I said no, I don't think --</p> <p>2 Q You don't?</p> <p>3 A -- because we're making the point of CASC, right,</p> <p>4 we're talking about a team that's dedicated to</p> <p>5 look via live video and monitor, and the point</p> <p>6 is: Will not having that unit reduce the</p> <p>7 enforcement? And my answer is no.</p> <p>8 Q Okay. And why do you think not?</p> <p>9 A As I described, the role that the entire agency</p> <p>10 has, not limited to the scope of one unit, which</p> <p>11 was comprised of correction officers, to call</p> <p>12 other correction officers, not having that team</p> <p>13 will not change whether or not we have -- there's</p> <p>14 no correlation for me between that team and</p> <p>15 compliance with masks. I don't connect the dots</p> <p>16 that way, because that team didn't just monitor</p> <p>17 masks, that was not their exclusive function.</p> <p>18 And I'm sure you probably don't share</p> <p>19 any experience, but looking at housing areas and</p> <p>20 observing what's taking place in facilities via</p> <p>21 live video is a lot of information and a lot to</p> <p>22 communicate. And it wasn't just exclusive to</p> <p>23 masks compliance, it was a lot of different items</p> <p>24 I don't want to labor for this conversation.</p> <p>25 But I do not connect the dots that</p>	<p style="text-align: right;">Page 168</p> <p>1 among officers who are failing to wear their</p> <p>2 masks properly?</p> <p>3 A We are doing now what we've always done since</p> <p>4 introducing this policy. We've allowed first --</p> <p>5 of all, we provide the resource, the actual mask;</p> <p>6 they're available every day in every place that</p> <p>7 an officer works. They have access. That's one.</p> <p>8 Two, they can opt to bring and wear</p> <p>9 their own if they choose to wear their own.</p> <p>10 Three, everyone, everyone is aware of</p> <p>11 our policy like I described with the messaging,</p> <p>12 with the posters and other ways that we have</p> <p>13 consistently shared with staff the requirements,</p> <p>14 every platform, every location within the</p> <p>15 facility, the housing areas, the locker rooms,</p> <p>16 the administrative areas, it's been consistent</p> <p>17 and continuous.</p> <p>18 So between just having it available,</p> <p>19 being able to provide your own if you choose to,</p> <p>20 and continuing with making sure that everybody</p> <p>21 understands, I don't think there's anything left</p> <p>22 that the department can do that we haven't.</p> <p>23 Q Has anything changed in the last two months about</p> <p>24 the department's enforcement of the mask mandate</p> <p>25 or education about the mask mandate?</p>

<p style="text-align: right;">Page 169</p> <p>1 A Well, I see the policy that we just discussed</p> <p>2 came out in May.</p> <p>3 Q Right.</p> <p>4 A Other than that, nothing comes to mind.</p> <p>5 Q And the reason I asked you a bit ago about your</p> <p>6 experience in law enforcement is that one of --</p> <p>7 law enforcement and having a law enforcement</p> <p>8 presence, say out on the street, has two</p> <p>9 purposes, right? One is deterrence to get people</p> <p>10 to voluntarily comply because the law's watching,</p> <p>11 two, is to apprehend or correct those people who</p> <p>12 break the law. That's basically the two purposes</p> <p>13 of having a law enforcement presence, correct?</p> <p>14 A Yes.</p> <p>15 Q Okay. So wouldn't you agree with me that if</p> <p>16 we're dealing with enforcement of an important</p> <p>17 policy like a mask mandate, the more eyes you</p> <p>18 have watching, the more likely you are to both</p> <p>19 get people to voluntarily comply and to impose</p> <p>20 discipline on those who choose not to?</p> <p>21 MR. THAYER: Objection, you can answer.</p> <p>22 THE WITNESS: I'm sorry, what happened,</p> <p>23 David?</p> <p>24 MR. THAYER: I just objected, but you</p> <p>25 can answer.</p>	<p style="text-align: right;">Page 171</p> <p>1 clear.</p> <p>2 Q You'd agree with me -- sorry, go ahead.</p> <p>3 A No, I'm done.</p> <p>4 Q Sorry, did you have anything -- I thought you</p> <p>5 were done but I sounded like maybe you weren't.</p> <p>6 A No, I'm done.</p> <p>7 Q Okay. Would you agree with me that the pandemic</p> <p>8 is still a significant threat?</p> <p>9 A Absolutely.</p> <p>10 Q How do you deal with those officers and staff you</p> <p>11 mentioned earlier today who have decided that</p> <p>12 they're not going to comply with the mask mandate</p> <p>13 no matter what, those outliers you're talking</p> <p>14 about?</p> <p>15 A So if I'm present, compliance, every supervisor,</p> <p>16 every leader in this agency, is required to</p> <p>17 correct any person in the observations that's not</p> <p>18 compliant with our policy. So in my presence, I</p> <p>19 personally don't have an occasion where I'm going</p> <p>20 to not recognize that this is a requirement and</p> <p>21 that compliance is not -- is not a question.</p> <p>22 My comment was more to the fact that I</p> <p>23 do recognize that they are individuals that</p> <p>24 operate that way.</p> <p>25 Q Right. What are you going to do to apprehend</p>
<p style="text-align: right;">Page 170</p> <p>1 Q (By Mr. Keenan) Would you like the question</p> <p>2 reread?</p> <p>3 A No, I don't, because I actually feel like I'm</p> <p>4 answering the same question in a different way.</p> <p>5 So I think like I've repeated several times, and</p> <p>6 I'll do it again, I -- the consistent continuous</p> <p>7 messaging has not changed with the agency.</p> <p>8 So in term of having an additional set</p> <p>9 of eyes, the role of CASC is to support staff,</p> <p>10 that's the roll of that unit, it was to support</p> <p>11 staff. It was not a catalyst for discipline;</p> <p>12 that's not the role, and the support and the</p> <p>13 education to the staff and the reminders has not</p> <p>14 changed because those officers are not there.</p> <p>15 The culture for this agency has been</p> <p>16 consistent. And I just want to add, that we have</p> <p>17 been very successful during this whole time and a</p> <p>18 lot of that success in terms of how we've managed</p> <p>19 to get through this pandemic has been because of</p> <p>20 that consistency.</p> <p>21 So if your point -- and I'll answer it</p> <p>22 the same way -- I do not connect the dots for the</p> <p>23 observations of a unit to have a negative impact</p> <p>24 if that unit doesn't exist because this agency is</p> <p>25 committed to this and we have been and that's</p>	<p style="text-align: right;">Page 172</p> <p>1 them because you can't be in every part of</p> <p>2 Rikers, can you?</p> <p>3 A You said apprehend them?</p> <p>4 Q Yeah, identify them, discipline them.</p> <p>5 A So I'm going to go back a little bit. For me, if</p> <p>6 I -- I'll just make an example. If I'm aware of</p> <p>7 someone who is not operating within our policy, I</p> <p>8 would have staff address it as I would do with</p> <p>9 any issue where staff are not complying with our</p> <p>10 policy. It would be addressed. It would be</p> <p>11 something that a supervisor would have to address</p> <p>12 within the facility or wherever it is that I make</p> <p>13 the observation.</p> <p>14 Q Here's -- here's kind of what I'm getting at.</p> <p>15 No -- no question that if you're eyes see someone</p> <p>16 refusing to comply, you're going to do something</p> <p>17 about it. But the issue is: How do you catch</p> <p>18 the people who are these outliers who are</p> <p>19 refusing to comply? What strategy do you have</p> <p>20 for identifying these people, taking action,</p> <p>21 other than just hoping that you happen to be</p> <p>22 there and catch them in a facility that has</p> <p>23 hundreds if not thousands of officers working</p> <p>24 there?</p> <p>25 A So my role or responsibility is not to apprehend,</p>

<p style="text-align: right;">Page 173</p> <p>1 my role is not to catch individuals. My job is 2 to ensure that we have a system in place. 3 Q And that's what I'm asking. I'm asking DOC's 4 strategy -- sometimes in these depositions of 5 corporate representatives, because you're here as 6 a representative of DOC, the "you" can get 7 confusing. So I apologize. I'm not talking just 8 about you, Chief Scott, personally; I'm talk 9 about the DOC. What is the DOC doing to identify 10 these kinds of incorrigible people who are 11 refusing to wear masks and correct that behavior? 12 A It's what we have in place for every policy 13 inclusive of the requirement to wear a mask. We 14 have a discipline system in place, that we talked 15 about the last meeting. Where we talked about 16 progressive discipline. That is a systematic 17 approach that we have -- and the "we" being DOC's 18 leadership -- to address anytime staff members 19 are observed not in compliance with our policy. 20 And that approach is for any violation 21 as is discovered. So if we're talking about 22 masks, if a supervisor -- and this is a 23 hypothetical example -- if a supervisor observes 24 someone they have the discretion to counsel that 25 person, to have a counseling session with that</p>	<p style="text-align: right;">Page 175</p> <p>1 give me a couple of minute here. Why don't we 2 take about -- why don't we take about a 3 five-minute break and then we'll be back at, you 4 know, about two, three after the hour. 5 MR. THAYER: Can we actually take ten. 6 MR. KEENAN: Sure, you bet. 7 (Brief recess.) 8 MR. KEENAN: Everybody ready to get 9 back on the record? 10 Q (By Mr. Keenan) Chief Scott, we are back on 11 the record after a short break. We talked 12 before the break about the Compliance and 13 Safety Center also known as is sound like CASC, 14 C-A-S-C? 15 A Yes. 16 Q Who was in charge of CASC when it was in 17 operation? 18 A Deputy Commission Feeney. 19 Q Okay. Did CASC generate reports about its 20 operations and what they found including but not 21 limited to mask issues? 22 A Yes. 23 Q Have you seen any of those reports? 24 A Yes. 25 Q And who has -- where are they kept and who keeps</p>
<p style="text-align: right;">Page 174</p> <p>1 person, or they can proceed with a command 2 discipline. 3 I think we discussed this previously. 4 So those are the measures that we have 5 in place. That's the system, systematic approach 6 to discipline for uniform members. And that is 7 the policy that we have to have that addressed if 8 it's seen. 9 Q Okay. You have not, in enforcing the mask 10 policy, you're relying on the same system that 11 you already had in place for discipline in 12 general prior to the pandemic, correct? 13 A Yes. 14 Q Both with respect to monitoring compliance with 15 policies and with respect to disciplining people 16 for noncompliance, correct? 17 A When you say monitoring, what do you mean? 18 Q The DOC has not implemented any new measures 19 since the onset of the pandemic to engage in any 20 extra monitoring or extra auditing of staff 21 compliance with masks, correct? 22 A Not to my knowledge, no. 23 MR. KEENAN: I'm going to briefly look 24 over my notes. I don't -- if we have anything 25 else, it will be a couple of minutes. But just</p>	<p style="text-align: right;">Page 176</p> <p>1 them? 2 A D.C. Feeney's team provides the reports and they 3 have them archived under her team. I don't know 4 what her recordkeeping system is, but I've seen 5 those reports. 6 Q Okay. Why don't we take a look at -- just a 7 second, I'm going to share a document here. 8 Chief Scott, I've just shown you on the 9 screen-share a document that has been previously 10 marked as Exhibit 131 in this case. I'll make 11 sure of that. That's 131. Starts on Bates stamp 12 NCY405. Do you recognize this format of 13 document? 14 A Yes. 15 Q Okay. Are these -- these are not the CASC 16 reports, are they? 17 A No. 18 MR. KEENAN: Okay. All right. Chuck, 19 David, maybe it's more a question for you, do you 20 know if CASC kept anything on mask compliance or 21 anything like that? 22 MR. THAYER: So it's my understanding 23 that there were some documents as D.C. Feeney was 24 indicating when they called someone that that 25 might be recorded; certainly something we're</p>

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1 looking into as well, understandably. But I
2 think maybe we'll need to touch base with Melissa
3 to get a better sense.
4 MR. KEENAN: Okay.
5 Q (By Mr. Keenan) Chief Scott, are you able to
6 tell us anymore details about those reports in
7 terms behalf they observe on masks, what you've
8 seen in them on masks?
9 A I don't recall anything specific to mask
10 compliance on those reports that I've seen.
11 There were other type of compliance issues that
12 I've seen highlighted in those report, but
13 nothing specifically for the mask.
14 Q What other types of compliance issues have you
15 seen highlighted in those reports?
16 A If an individual was not searched properly, if an
17 individual didn't conduct a proper tour, if a
18 person was not patrolling the housing area
19 properly like more security related issues, not
20 anything specific to mask compliance that I
21 recall.
22 Q And not anything specific to COVID?
23 A No.
24 MR. KEENAN: Okay, looking over my
25 notes. Chief Scott, thank you for your time this

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1 afternoon. I have no further questions for you
2 at this time.
3 THE WITNESS: This is it? I'm -- this
4 is over for us?
5 MR. ORSLAND: Yes.
6 MR. THAYER: Never say never, but yes,
7 we don't have any questions.
8 MR. ORSLAND: I'm sure he'll find
9 others to ask questions about.
10 THE WITNESS: All right. Great,
11 everyone I guess enjoy your Memorial Day weekend
12 and be safe.
13 MR. KEENAN: You too.
14 (Deposition concluded.)
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1 I, CHIEF BECKY SCOTT, VOLUME II, have read the
2 foregoing deposition, and hereby affix my signature
3 that same is true and correct except as noted above.
4
5 BECKY SCOTT, VOLUME II
6
7 STATE OF _____:
8 COUNTY OF _____:
9
10 Before me, _____
11 on this day personally ~~BECKY SCOTT~~, known to me
12 (or proved to me on the oath of _____ or through (description of
13 identity card or other document) to be the person
14 whose name is subscribed to the foregoing
15 instrument and acknowledged to me that they
16 executed the same for the purposes and
17 consideration therein expressed.
18
19 Given under my hand and seal of office
20 this _____ day of _____, 2021.
21
22 Notary Public in and for
23 the State of _____:
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25 My Commission expires:
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