STATE OF NEW JERSEY

In the Matter of Brandi L. Hunt
Mountainview Youth Correctional
Facility, Department of Corrections

CSC DKT. NO. 2018-3228
OAL DKT. NO. CSR 07968-18

FINAL ADMINISTRATIVE ACTION OF THE CIVIL SERVICE COMMISSION

ISSUED: FEBRUARY 22, 2019 BW

The appeal of Brandi L. Hunt, Senior Correctional Police Officer, Mountainview Youth Correctional Facility, Department of Corrections, removal effective April 24, 2018, on charges, was heard by Administrative Law Judge Carl V. Buck, III, who rendered his initial decision on January 16, 2019. Exceptions were filed on behalf of the appellant and a reply to exceptions was filed on behalf of the appointing authority.

Having considered the record and the Administrative Law Judge's initial decision, and having made an independent evaluation of the record, the Civil Service Commission (Commission), at its meeting of February 20, 2019, accepted and adopted the Findings of Fact and Conclusion as contained in the attached Administrative Law Judge's initial decision.

ORDER

The Civil Service Commission finds that the action of the appointing authority in removing the appellant was justified. The Commission therefore affirms that action and dismisses the appeal of Brandi L. Hunt.

This is the final administrative determination in this matter. Any further review should be pursued in a judicial forum.

DECISION RENDERED BY THE
CIVIL SERVICE COMMISSION ON
THE 20th DAY OF FEBRUARY, 2019

Deirdré L. Webster Cobb

Deirdré L. Webster Cobb
Chairperson
Civil Service Commission

Inquiries
and
Correspondence

Christopher S. Myers
Director
Division of Appeals and Regulatory Affairs
Civil Service Commission
P. O. Box 312
Trenton, New Jersey 08625-0312

Attachment

State of New Jersey
OFFICE OF ADMINISTRATIVE LAW

INITIAL DECISION
OAL DKT. NO. CSR 07968-18
AGENCY DKT. NO. N/A 2018-3228

BRANDI L. HUNT, MOUNTAINVIEW YOUTH CORRECTIONAL FACILITY.

Robert A. Fagella, Esq., appearing for appellant Brandi L. Hunt (Zazzali, Fagella, Nowak, Kleinbaum & Friedman, attorneys)

Daniel Pierre, Deputy Attorney General, appearing for respondent Mountainview Youth Correctional Facility (Gurbir S. Grewal, Attorney General of New Jersey, attorney)

Record Closed: December 3, 2018 Decided: January 16, 2019

BEFORE **CARL V. BUCK, III**, ALJ:

STATEMENT OF THE CASE

Appellant, Brandi Hunt, appeals from the determination of the respondent, Mountainview Correctional Youth Facility (Facility), to remove her from her position as a Senior Correction Officer (SCO) due to her contact with a parolee.

The appellant is charged with violations of N.J.A.C. 4A:2-2.3(a)(6) Conduct unbecoming a public employee, and N.J.A.C. 4A:2-2.3(a) (12) Other sufficient cause. She is also charged with violations of Human Resources Bulletin (HRB) 84-17, as amended C-11, Conduct unbecoming a public employee; HRB 84-17, as amended D-4, Improper or unauthorized contact with inmate – undue familiarity with inmates, parolees, their families, or friends; HRB 84-17, as amended D-7, Violations of an administrative procedure and/ or regulation involving safety and security; and HRB 84-17, as amended E-1, Violation of a rule, regulation, policy, procedure, order or administrative action.

PROCEDURAL HISTORY

A Preliminary Notice of Disciplinary Action (PNDA) was filed against appellant by the respondent on February 15, 2018. A departmental hearing was conducted on April 16, 2018. On April 24, 2018, the Final Notice of Disciplinary Action (FNDA) removing the appellant from her position was filed, to be effective that date. The appellant promptly filed an appeal. The matter was transmitted to the Office of Administrative Law (OAL), where it was filed on January 28, 2015. N.J.S.A. 52:14B-1 to -15; N.J.S.A. 52:14F-1 to -13.

The hearing was held on September 26 and 28, 2018. The record remained open for the submission of post-hearing briefs. After receipt of the post-hearing briefs, the record closed on December 3, 2018.

FACTUAL DISCUSSION

Testimony

Respondent

Patrick Sesulka (Sesulka), Senior Investigation in the Special Investigation Division (SID) testified on behalf of the respondent. He testified to his experience and background as a SID investigator. On December 15, 2017, SID received information from a confidential informant, identifying herself as "Jessica" who suggested that the appellant

was in a relationship with inmate M.D. (R- 3). M.D. had been under appellant's supervision during his incarceration at the facility. The informant stated that M.D. attempted to terminate the relationship with appellant; however, she continued to call him from a telephone number. The telephone number was (9XX) 3XX – 7XXX. Sesulka researched the telephone number and determined that the telephone number belonged to the appellant.

To investigate the allegations, SID submitted a subpoena request for subscriber information and call detail records for appellants cellular telephone number from her telephone carrier Sprint. (R- 6). A review of the telephone records at appellant's personnel file confirmed that (9XX) 3XX – 7XXX was her telephone number. (R-5, R-7, R-9, R-10). The telephone records further revealed that there were many (perhaps thousands) minutes of telephone calls and text messages between the telephone number and two telephone numbers associated with M.D. (R-8). The telephone numbers associated with M.D. (R-11). The telephone records revealed that the communications between appellant and M.D. began the day he was paroled, September 8, 2017. (R-8). The two telephone numbers purported to belong to M.D. were confirmed through M.D.'s parole officer. (R-11).

SID interviewed the appellant on February 12, 2018. (R-13). She was administered her Weingarten Rights at the beginning of the interview. During the interview she confirmed that (9XX) 3XX – 7XXX was her cellular telephone number since at least 2009 and that she was the only person who used that telephone number. (R-13). After being informed that SID had obtained her telephone records, the appellant admitted to both texting and speaking with M.D. outside of work. She stated that M.D. had received her telephone number through her cousin, Thomas Alston (Alston). She further admitted that she knew M.D. was on parole status when they first communicated, and that she did not report this conversation to the Department. She stated that her conversations with M.D. were personal in nature, discussing M.D.'s family, his girlfriend and work. (R-13).

Sesulka stated that appellant admitted she was aware of the Department's policies prohibiting contacts with parolees. Appellant had received the policy directive on staff/inmate overfamiliarity which explicitly prohibited Correction Officers (COs) from

engaging in non-work-related conversations with inmates, parolees, or their families or friends. (R-17, R-19).

Sesulka stated he had interviewed Alston through a recorded telephone conversation. Alston stated he (Alston) provided the appellant's telephone number to M.D. in January 2018 (notwithstanding that contact between appellant and M.D. began in September 2017). Alston claimed he knew M.D., but could not provide answers to rudimentary questions concerning M.D.; i.e. M.D.'s physical appearance, height, etc. The telephone recording was presented, and the individual purported to the Alston seemed unsure of information and halting during the telephone call.

On cross-examination, Sesulka was questioned about the informant and did state that he had attempted to contact Jessica. He left a voicemail on her telephone number. He did not receive a return telephone call.

Michael White (White), Major, State of New Jersey Department of Corrections (DOC), testified for the respondent. He had been employed by DOC for twenty-one years with responsibilities as Major included, rating and updating policies, ensuring policies are being followed by staff, reviewing safety and security violations, and maintaining familiarity with the Department's policies and procedures.

White testified to the "Law Enforcement Personnel Rules and Regulations" (rules). Specifically, Section 4 of Article 3 of the rules which prohibit a CO from contacting an inmate/parolee until one year after the inmate/parolee completes their court-imposed sanctions. (R-16). Further, in order to communicate with an inmate/parolee, the CO must first receive written permission from the Department. (R-16). Section 6 of Article 2 of the rules requires that an officer notify the Department, in writing, of any unauthorized contact. R-16).

The rules also contain a specific policy governing undue familiarity titled "Standards of Professional Conduct: Staff/Inmate Over Familiarity" which policy prohibits COs from maintaining any type of relationship with any inmate/parolee or their

families/friends. (R-18). The purpose of this policy is to prevent DOC staff from communicating with an inmate/parolee or their families or friends outside of work.

White stated that it would reflect poorly upon the DOC if the CO who had supervised an inmate while in prison, later became involved with the inmate once they were paroled. These relationships could lead to favoritism, intimidation or extortion involving the facility. The result would be that the staff (member) could become compromised. White stated that the appellant violated the policy as she communicated with a parolee - knowing he was paroled during their conversations. The fact that multiple telephone conversations or multiple text messages were exchanged violated the policy; which did not have a "minimum" or "maximum" number in order to constitute a violation. Pursuant to the rules, the appellant was required to terminate the telephone call once she was aware that a former inmate had telephoned her, and then report the telephone call to her supervisor. As to the term "undue familiarity", the DOC provides their employees with training to explain what constitutes "undue familiarity". The trainings listed conversations, other than on work related issues, as an example of undue familiarity. (R-23). The appellant had received training on, and copies of, these rules.

White further stated that the appellant received the appropriate charges for this violation, based upon the circumstances of the case, and that removal was the properly imposed penalty for this infraction. For this infraction, in his experience, he had not seen the imposition of a penalty less severe than removal.

Appellant

Brandi Hunt (Hunt), SCO, Mountainview Youth Correctional Facility, testified on her own behalf to the following: She has been employed at the facility for thirteen years. As a SCO, she was responsible to work the units, conduct searches, take counts of inmates and monitor the logbook. She also testified that she had a second job with Environmental Protection Agency in Edison. She spoke about her brother, L.H., who was incarcerated in Trenton. She stated she would try to visit him once a month.

She stated that she was, at times, also assigned to supervise inmate M.D. She stated she did not have a physical romantic or sexual relationship with the inmate but did admit to speaking with him on the telephone during his parole. She stated she received a telephone call from M.D. and that M.D.'s initial contact was a result of M.D. obtaining the appellant's telephone number from Alston. M.D. wished to initially ask the appellant about her brother L.H.

She stated that she did not have permission to speak with the inmate and that she did not report their unauthorized conversations to the Department. She stated that a number the telephone calls on M.D.'s cellular telephone were placed in order to speak with M.D.'s girlfriend "Adiana." The appellant stated they (appellant and Adiana) discussed childhood friends in Irvington and eventually developed a relationship during their telephone calls and engaged in telephone sex on several occasions. The appellant stated she was aware that at Adiana was M.D.'s girlfriend when she began the relationship with Adiana.

The appellant testified to her sexual orientation specifically that she was a lesbian, but she felt her work to be a hostile environment and did not wish her sexual orientation to be known at work. During further discussions with Adiana, she later began threatening the appellant once the appellant wished to end their relationship. The appellant stated she was concerned that at Adiana could retaliate against her and further admitted she did not relay these conversations to the Department - as she wanted her sexual orientation to remain a personal issue. She also stated that the majority of the telephone calls and contacts were with Adiana, not with M.D.

Asha Jones (Jones), appellant's girlfriend, testified on behalf of the appellant and said that she learned that the appellant was speaking with at Adiana in October 2017.

Jeffrey Scott (Scott) SCO, Mountainview Youth Correctional Facility, testified behalf of the appellant to the following: Scott has been employed by the facility for approximately fifteen years and supervised M.D. during M.D.'s time at the facility. Scott did not notice any relationship between the appellant and M.D. Scott did hear Adiana

threaten Hunt during a telephone call in November 2017. Scott was aware of the appellant's sexual orientation since 2010.

FACTUAL FINDINGS

Based upon due consideration of the testimonial and documentary evidence presented at the hearing, and having had the opportunity to observe the demeanor of the witnesses and assess their credibility, I **FIND** the following **FACTS**:

1. Appellant, Hunt, was an employee of Mountainview Youth Correction Facility for approximately thirteen years, most recently as a SCO.

2. The testimony of Patrick Sesulka and Michael White has provided the pertinent policies, rules and regulations regarding contact with and over familiarity between staff and inmates. There are clear specifics of those policies, rules and regulations which can support a finding that a violation has occurred.

3. SCO Hunt committed a violation of N.J.A.C. 4A:2-2.3(a)(6), conduct unbecoming a public employee.

4. SCO Hunt committed a violation of N.J.A.C. 4A:2-2.3(a) (12), other sufficient cause.

5. SCO Hunt committed a violation of HRB 84-17, as amended, C 11, conduct unbecoming a public employee.

6. SCO Hunt committed a violation of HRB 84-17, as amended, D 4, Improper or unauthorized contact with inmate – undue familiarity with inmates, parolees, their families or friends.

7. SCO Hunt committed a violation of HRB 84-17, as amended, D 7, violation of administrative procedures and/or regulations involving safety and security.

8. SCO Hunt committed a violation of HRB 84-17, as amended, E 1, violation of a rule, regulation, policy, procedure, order or administrative decision.

LEGAL ANALYSIS AND CONCLUSION

Charges

The Civil Service Act, N.J.S.A. 11A:1-1 to 12-6, governs a public employee's rights and duties. The Act is an important inducement to attract qualified personnel to public service and is liberally construed toward attainment of merit appointments and broad tenure protection. Essex Council No. 1, N.J. Civil Serv. Ass'n v. Gibson, 114 N.J. Super. 576, 581 (Law Div. 1971), rev'd on other grounds, 118 N.J. Super. 583 (App. Div. 1972); Mastrobattista v. Essex Cnty. Park Comm'n, 46 N.J. 138, 147 (1965). The Act sets forth that State policy is to provide appropriate appointment, supervisory and other personnel authority to public officials so they may execute properly their constitutional and statutory responsibilities. N.J.S.A. 11A:1-2(b). To carry out this policy, the Act authorizes the discipline (and termination) of public employees. N.J.S.A. 11A:2-6.

A civil-service employee who commits a wrongful act related to her or her duties, or gives other just cause, may be subject to major discipline. N.J.S.A. 11A:2-6; N.J.S.A. 11A:2-20; N.J.A.C. 4A:2-2.2. The general causes for such discipline are set forth in N.J.A.C. 4A:2-2.3(a). In an appeal from such discipline, the appointing authority bears the burden of proving the charges upon which it relied by a preponderance of the competent, relevant and credible evidence. N.J.S.A. 11A:2-21; N.J.A.C. 4A:2-1.4(a); Atkinson v. Parsekian, 37 N.J. 143, 149 (1962); In re Polk, 90 N.J. 550, 561 (1982).

The evidence must be such as to lead a reasonably cautious mind to the given conclusion. Bornstein v. Metro. Bottling Co., 26 N.J. 263, 275 (1958). Therefore, the judge must "decide in favor of the party on whose side the weight of the evidence preponderates, and according to the reasonable probability of truth." Jackson v. Delaware, Lackawanna and W. R.R., 111 N.J.L. 487, 490 (E. & A. 1933).

The appellant herein is charged with violations of N.J.A.C. 4A:2-2.3(a)6 Conduct unbecoming a public employee, and N.J.A.C. 4A:2-2.3(a)12 Other sufficient cause. She is also charged with violations of HRB 84-17, as amended C-11, Conduct unbecoming a public employee; HRB 84-17, as amended D-4, Improper or unauthorized contact with inmate – undue familiarity with inmates, parolees, their families, or friends; HRB 84-17, as amended D-7, Violations of an administrative procedure and/ or regulation involving safety and security; and HRB 84-17, as amended E-1, Violation of a rule, regulation, policy, procedure, order or administrative action.

Police officers are held to a higher standard of conduct than other citizens due to their roles in the community. In re Phillips, 117 N.J. 567, 576–577 (1990). Moreover, correction officers are held to the same high standard of conduct as police officers. Gloucester Cnty. v. Pub. Emp't Relations Comm'n, 107 N.J. Super. 150 (App. Div. 1969), aff'd, 55 N.J. 333 (1970). They represent "law and order to the citizenry and must present an image of personal integrity and dependability in order to have the respect of the public." Moorestown v. Armstrong, 89 N.J. Super. 560, 566 (App. Div. 1965), certif. denied, 47 N.J. 80 (1966).

As a paramilitary organization, respondent's rules and regulations are to be strictly followed. Maintenance of strict discipline is important in military-like settings such as police departments, prisons and correctional facilities. Rivell v. Civil Serv. Comm'n, 115 N.J. Super. 64, 72 (App. Div.), certif. denied, 50 N.J. 269 (1971); City of Newark v. Massey, 93 N.J. Super. 317 (App. Div. 1967).

"Conduct unbecoming a public employee" has been interpreted broadly as conduct that adversely affects the morale or efficiency of a governmental unit or that has a tendency to destroy public respect for governmental employees and confidence in the delivery of governmental services. Karins v. City of Atl. City, 152 N.J. 532, 554 (1998); see also In re Emmons, 63 N.J. Super. 136, 140 (App. Div. 1960). It is sufficient that the complained-of conduct and its attending circumstances "'be such as to offend publicly accepted standards of decency.'" Karins, 152 N.J. at 555 (quoting In re Zeber, 156 A.2d 821, 825 (1959)). Such misconduct need not "'be predicated upon the violation of any particular rule or regulation, but may be based merely upon the violation of the implicit

standard of good behavior.'" Hartmann v. Police Dep't of Ridgewood, 258 N.J. Super. 32, 40 (App. Div. 1992) (quoting Asbury Park v. Dep't of Civil Serv., 17 N.J. 419, 429 (1955)).

The appellant has also been charged with "other sufficient cause," in this case, violating DOC policy which precludes interaction with a parolee/ inmate until a year after the inmate/ parolee finishes all their court-imposed sanctions (R-16). Violating a rule or policy means failure to adhere to the standards set forth by the particular institution.

In this matter, a number of the facts are not in dispute. The appellant is an SCO at the Mountainview Youth Correctional Facility. Her conduct is governed by the DOC's "Rules and Regulations for Law Enforcement Personnel". The appellant received training on "The Corrections Employee As A Professional/ Undue Familiarity" and "Professionalism" (R-20, R-21, R-22) which listed conversation with an inmate on a non-work-related issue as an example of undue familiarity. Appellant admits to participating in numerous telephone calls and texts with parolee M.D. and/ or M.D.'s girlfriend, Adiana. Appellant further admits to engaging in telephone sex with Adiana on several occasions.

Penalty

Once a determination is made that an employee has violated a statute, regulation or rule concerning her employment, the concept of progressive discipline must be considered. W. New York v. Bock, 38 N.J. 500 (1962). However, it is well established that where the underlying conduct is of an egregious nature, the imposition of a penalty up to and including removal is appropriate, regardless of an individual's disciplinary history. Henry v. Rahway State Prison, 81 N.J. 571 (1980). Progressive discipline is not a "fixed and immutable rule to be followed without question." Carter v. Bordentown, 191 N.J. 474, 484 (2007). Indeed, it is recognized that some disciplinary infractions are so serious that removal is appropriate notwithstanding a largely unblemished record. Ibid.

It is undisputed that the appellant has had no disciplinary actions filed during her employment.

The Facility relies on the egregiousness of appellant's conduct and the policies and procedures that appellant failed to adhere to in asserting that progressive discipline is not warranted, and that termination is appropriate for this first-time discipline. Particularly because the Facility is operated as a paramilitary organization, and, as such, rules and regulations are to be strictly followed. Maintenance of strict discipline is important in military-like settings such as police departments, prisons, and correctional facilities. Rivell v. Civil Serv. Comm'n, 115 N.J. Super. 64, 72 (App. Div.), certif. denied, 50 N.J. 269 (1971); City of Newark v. Massey, 93 N.J. Super. 317 (App. Div. 1967). Refusal to obey orders and disrespect of authority are not to be tolerated. Cosme v. Borough of E. Newark Twp. Comm., 304 N.J. Super. 191, 199 (App. Div. 1997).

The charges are particularly offensive in that a law-enforcement officer is held to a higher standard of conduct than other employees, and is expected to act in a responsible manner, honestly, and with integrity, fidelity, and good faith. In re Phillips, 117 N.J. 567, 576 (1990); Reinhardt v. E. Jersey State Prison, 97 N.J.A.R.2d (CSV) 166.

Appellant seeks a dismissal of the charges, based on the assertion that the actions of appellant "...[p]osed no threat to the institution [and of the appellant] should be given the benefit of the doubt, particularly where the officer has never been discipline[d] or failed to adhere to all DOC policies, at any time in her professional career." I disagree.

In determining the appropriate penalty to be imposed, the following aggravating factors have been considered: the seriousness of the offense, namely, having been in contact with a parolee (and/ or a close acquaintance [M.D. having referred to Adiana as "my girl"]) for a period exceeding several months; the lack of judgment demonstrated by the appellant in not reporting the initial contact by M.D.; the lack of judgment demonstrated by discontinuing conversations or text exchanges with M.D. or Adiana; the lack of judgment demonstrated by the appellant in not reporting the contact or exchanges or engaging in telephone sex; the wrong message it would send to inmates or parolees that correction officers are held to a lesser standard of conduct; and the lack of regard for the law, rules and regulations the appellant swore to uphold. It is of substantial concern that the appellant engaged in these activities for a period of many months without reporting this activity to her superiors. It is of further substantial concern that appellant,

as documented by her own testimony, placed herself in a position which could compromise herself, her employer, her co-workers, and potentially the public.

What could be interpreted as mitigating factors presented by the appellant, include the appellant's intense work schedule (working two jobs); personal concerns and caring for her parents; and problems in personal relationships. This, in addition to her desire to keep her sexual orientation private, have been presented for consideration.

When the aggravating and mitigating factors are weighed, there can be no conclusion, but that removal is required. There can be no tolerance for the flagrant violation of rules and regulations evidenced here. Specifically, disregard of the rules and regulations which could lead to a correction officer being compromised.

Hereby appellant's own testimony, she placed herself in a position where she could be compromised. This is precisely the type of activity that the rules seek to prevent an appellant has placed herself in a position where she not only continued for a substantial period with telephone calls, text messages, and telephone sex with an individual associated with a former inmate (now on parole), she also exposed herself to compromise or extortion - and the fact that "Adiana" was aware of her sexual orientation and threatened to make that orientation and the parties activities public.

Further, appellant seeks dismissal of the charges based upon the fact that the officer has not been the subject of prior discipline nor has she failed to adhere to all DOC policies at any time in her professional career. I find this argument to be specious. By her very actions and admissions in this matter she has blatantly and flagrantly decided to willfully disregard the policies and procedures put in place by the DOC for her protection, the protection of her employers and the protection of her coworkers. Appellant also argues that no violation occurred as she did not have a relationship with M.D. during the time of his incarceration. This also completely disregards the specific tenants of Article 3, Section 4, "No officer shall become unduly familiar with inmates who are incarcerated, on community release, or on parole status, within one year of the completion or vacating of all court-imposed sentences or while the former inmate is under any form of criminal

justice jurisdiction. An officer shall report all prior relationships with inmates or parolees in writing to the administrator or his or her designee."

It is perfectly clear to me that appellant's actions are violative of Article 3, Section 4 as well as the duties and responsibilities of an employee of the State of New Jersey, Department of Corrections. I therefore **CONCLUDE** that the most appropriate penalty for the appellant's conduct is removal from her position as a senior correction officer.

ORDER

I **ORDER** the charges against the appellant for violations of N.J.A.C. 4A:2-2.3(a)6 Conduct unbecoming a public employee, and N.J.A.C. 4A:2-2.3(a)12 Other sufficient cause; Violations of HRB 84-17, as amended C-11, Conduct unbecoming a public employee; HRB 84-17, as amended D-4, Improper or unauthorized contact with inmate – undue familiarity with inmates, parolees, their families, or friends; HRB 84-17, as amended D-7, Violations of an administrative procedure and/or regulation involving safety and security; and HRB 84-17, as amended E-1, Violation of a rule, regulation, policy, procedure, order or administrative action, are hereby sustained and that the action of the Mountainview Youth Correction Facility in removing appellant from her position as a Senior Correction Officer are **AFFIRMED**. The appeal is hereby **DISMISSED**.

I hereby **FILE** my Initial Decision with the **CIVIL SERVICE COMMISSION** for consideration.

This recommended decision may be adopted, modified or rejected by the **CIVIL SERVICE COMMISSION**, which by law is authorized to make a final decision in this matter. If the Civil Service Commission does not adopt, modify or reject this decision within forty-five days and unless such time limit is otherwise extended, this recommended decision shall become a final decision in accordance with N.J.S.A. 40A:14-204.

Within thirteen days from the date on which this recommended decision was mailed to the parties, any party may file written exceptions with the **DIRECTOR, DIVISION OF APPEALS AND REGULATORY AFFAIRS, UNIT H, CIVIL SERVICE COMMISSION, 44 South Clinton Avenue, PO Box 312, Trenton, New Jersey 08625-0312**, marked "Attention: Exceptions." A copy of any exceptions must be sent to the judge and to the other parties.

January 16, 2019
DATE

CARL V. BUCK, III, ALJ

Date Received at Agency: 1/16/19

Date Mailed to Parties: 1/16/19

/lam

APPENDIX

WITNESSES

For appellant:

Brandi Hunt

Aisha Jones

Jeffrey Scott

For respondent:

Patrick Sesulka

Michael White

EXHIBITS

For appellant:

P – 1 Identification

For respondent:

R – 1 Hunt's final notice of disciplinary action

R – 2 Sprint business record affidavits

R – 3 DOC's 12/15/17 email

R – 4 The inmate computer database (iTAG)

R – 5 Computer search of public records

R – 6 Commissioners subpoena

R – 7 Sprint subscriber information

R – 8 Sprint phone details records

R – 9 Sprint Key to Understanding

R – 10 Hunt's personnel file documents

R – 11 Giovanni Santibanez's 12/20/17 email

R – 12 Hunt's Weingarten Rights acknowledge form

R – 13 Hunt's videotaped interview

R – 14 Alston's audiotaped recording

R – 15 Investigator Sesulka's investigative report

R – 16 Law Enforcement Personnel Rules and Regulations Manual

R – 17 Hunt's receipt of rules and regulations manual

R – 18 Policy statement regarding staff/inmate overfamiliarity

R – 19 Hunt's new hire orientation checklist

R – 20 Hunt's training summary report

R – 21 Training on undue familiarity, as of June 2010

R – 22 Training on undue familiarity, as of June 2017

R – 23 Training unprofessionalism, as of October 2011

R – 24 Sprint phone details records (1/18/18 to 2/1/18)

R – 25 SCO Scott's training summary reports

R – 26 SCO Scott's disciplinary record

Joint:

J – 1 HRB 84 – 17

J – 2 Hunt's 2017 W-2