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MEMORANDUM OF INVESTIGATION

Case Number: 2008-000904	Reporting Office: Atlanta Area Office
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RE: Interview – Paralegal Specialist Tamarah Grimes, USAO, MDAL

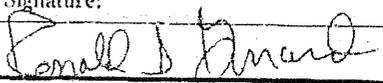
On March 27, 2008, Paralegal Specialist Tamarah Grimes, United States Attorney's Office (USAO), Middle District of Alabama, was interviewed at the USAO in Montgomery, Alabama. OIG Special Agents Ronald Gossard and Phil Van Nimwegen conducted the interview. The interview was conducted in reference to an allegation that Grimes had surreptitiously tape-recorded comments made by co-workers during seven official meetings pertaining to the prosecution of a high profile public corruption case and that the recordings were allegedly made in reference to an Equal Employment Opportunity (EEO) complaint filed by Grimes against one of the co-workers. After being advised of the allegation and her obligation to respond truthfully per OIG Form III-226/3, *Warnings and Assurances to Employee Required to Provide Information*, Grimes provided the following relevant information under oath during her OIG interview, which was tape-recorded:

- Grimes denied ever audio recording any DOJ employee or providing her attorney with any audio recordings.
- Grimes denied telling the mediator, Deputy Chief Sharon Stokes, Civil Division, USAO, Northern District of Georgia, Atlanta, Georgia that she had made any tape recording(s) supporting her EEO allegations during the mediation (November 1-2, 2007).
- According to Grimes, she told Stokes that she had "written recordings" supporting her EEO allegations. Grimes told OIG agents that the word "tapes" was never mentioned during the 2-day mediation process – only recordings or evidence. Grimes stated that there was a misperception or miscommunication between her and Stokes.
- Grimes denied giving Stokes authorization to tell the agency representatives that she had tape recordings, since tapes were never discussed.
- Grimes denied or could not recall Stokes asking her if the agency representatives could listen to the tape recordings. Grimes also denied telling Stokes that she (Grimes) released the tape recordings to her attorney. According to Grimes, she told Stokes that she gave her attorney a copy of her written recordings or notes that showed she was subjected to a hostile environment. Grimes reiterated to OIG investigators that she provided a copy of her contemporaneous notes to her attorney, Scott Boudreaux, Birmingham, Alabama.

Grimes declined to submit to an OIG administered polygraph to verify the truthfulness of her statements.

Attachments:

1. OIG Form III-226/3 - *Warnings and Assurances to Employee Required to Provide Information*.
2. Interview Transcript

Special Agent Name and Signature: Ronald S. Gossard 	Date: 04/14/2008	Reviewer: 
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AUDIOTAPED
SWORN STATEMENT
OF
TAMARA GRIMES

OIG CASE# 2008-000904

DEPARTMENT OF JUSTICE
OFFICE OF THE INSPECTOR GENERAL
MARCH 27TH, 2008

1 APPEARANCES:

2

3 OFFICE OF THE INSPECTOR GENERAL

4 BY: SPECIAL AGENT RON S. GOSSARD

5 BY: SPECIAL AGENT PHIL VAN NIMWEGEN

6

7 WITNESS:

8 TAMARA GRIMES

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1 OIG SA GOSSARD: This is Special Agent Ron
2 Gossard with the United States Department of
3 Justice, Office of the Inspector General.
4 Today's date is March 27th, 2008. The time is
5 approximately 11:00 a.m. Central Time.

6 Also present is Special Agent Phil Van
7 Nimwegen, and also Paralegal Specialist Tamara
8 Grimes.

9 We're here today to conduct an
10 administrative interview of Ms. Grimes.
11 Ms. Grimes is the subject of the investigation.
12 The interview is being conducted at the -- in
13 Montgomery, Alabama, at the U.S. Attorney's
14 Office.

15 At this time, Ms. Grimes, if you would
16 please stand and raise your right hand.

17 If you -- are you okay? You can sit.

18 MS. GRIMES: Yeah -- no, I can stand,
19 that's okay.

20 OIG SA GOSSARD: DO YOU SWEAR OR AFFIRM
21 THAT THE STATEMENT YOU'RE ABOUT TO GIVE SHALL
22 BE TRUE AND CORRECT TO THE BEST OF YOUR
23 KNOWLEDGE AND BELIEF?

24 MS. GRIMES: I do.

25 OIG SA GOSSARD: Okay. Please be seated.

1 Alright, Ms. Grimes, before we get into any
2 questions like we discussed on the phone the
3 other day I have a Kalkines Warning Form here.
4 I'll read that to you, the pertinent parts, and
5 then I'll give you an opportunity to look it
6 over prior to signing it.

7 "You are being asked to provide
8 information as part of an inquiry being
9 conducted by the Office of the Inspector
10 General.

11 "This inquiry is being conducted pursuant
12 to the Inspector General Act of 1978 as
13 amended. This inquiry pertains to allegations
14 of Unauthorized Disclosure of Sensitive Law
15 Enforcement Information.

16 "You have a duty to reply to the questions
17 posed to you during this interview. And agency
18 disciplinary action, including dismissal, may
19 be undertaken if you refuse to answer or fail
20 to reply fully and truthfully.

21 "Neither your answers nor any information
22 or evidence gained by reason of your answers
23 can be used against you in any criminal
24 proceeding.

25 "However, if you knowingly and willfully

1 provide false statements or information in your
2 answers, you may be criminally prosecuted for
3 that action.

4 "The answers you furnish and any
5 information or evidence resulting therefrom may
6 be used in the course of agency disciplinary
7 proceedings."

8 And then down below there's an
9 Acknowledgement we'll get into.

10 I'm going to go ahead and sign this now.
11 I'll have Mr. Nimwegen witness it.

12 And, Tamara, if you would please take your
13 time, read over that, and let me know if you
14 have any questions.

15 MS. GRIMES: -- push me up.

16 OIG SA VAN NIMWEGEN: Of course.

17 MS. GRIMES: So I can reach. Sorry.

18 OIG SA VAN NIMWEGEN: That's all right.

19 MS. GRIMES: Thank you.

20 OIG SA VAN NIMWEGEN: How's that?

21 MS. GRIMES: That's good, thank you.

22 OIG SA GOSSARD: Any questions, Tamara?

23 MS. GRIMES: No.

24 OIG SA GOSSARD: Okay. Just a few admin

25 notes before we get started with the actual

1 questioning. If you need to take a break at
2 any time during the interview, just let me
3 know, and of course we'll make that happen.

4 You stated that occasionally you need to
5 get up, stand up. Feel free to do that at any
6 time.

7 I would ask that when I ask the question,
8 that you let me ask the question. And when you
9 answer the question, I'm going to let you
10 answer the question unless we are kind of
11 getting off the mark, and then I may halt you
12 at that time and redirect.

13 Also I noticed you kind of talk, unlike
14 myself, in a soft voice. I would ask that you,
15 you know, try to speak up so that the recorder
16 does pick that up.

17 Is there anything today that would impact
18 your memory, your recollection of events? Are
19 you taking any types of medications that could
20 possibly affect your recall?

21 MS. GRIMES: I specifically did not take
22 any pain medication today, so --

23 OIG SA GOSSARD: Okay.

24 MS. GRIMES: -- that I would be able to
25 speak to you clearly.

1 OIG SA GOSSARD: Okay. And so you -- and
2 of course you're not under the influence of
3 drugs or alcohol --

4 MS. GRIMES: No.

5 OIG SA GOSSARD: -- at this time? Okay.

6 Also standard, do you have any recording
7 devices on your person --

8 MS. GRIMES: No.

9 OIG SA GOSSARD: -- at this time? Okay.

10 And of course no weapons?

11 MS. GRIMES: No weapons.

12 OIG SA GOSSARD: Okay. Alright. And
13 we'll -- I'm going to start out with a couple
14 of background questions, Tamara.

15 First, if you would, when did you join the
16 U.S. Attorney's Office?

17 MS. GRIMES: April 20th, 2003.

18 OIG SA GOSSARD: Okay. And you worked
19 your whole time with the federal government
20 here at the -- in the Middle District of
21 Alabama?

22 MS. GRIMES: Yes.

23 OIG SA GOSSARD: Okay. And what -- what
24 are your duties?

25 MS. GRIMES: My duties that I actually do

1 or my duties from my workplan?

2 OIG SA GOSSARD: Okay. Generally
3 speaking, you're I understand a paralegal
4 specialist?

5 MS. GRIMES: Yes, uh-huh.

6 OIG SA GOSSARD: Okay. And you work in
7 the Civil Division?

8 MS. GRIMES: I do work in the Civil
9 Division. I spend a lot more time doing
10 collateral duty assignments for the Executive
11 Office of the U.S. Attorney's and EEO Division.
12 I spend more time doing duties for that than I
13 do actually to my assigned duties here.

14 OIG SA GOSSARD: Okay. And when did you
15 get moved to a off-site location for this high
16 profile public corruption case?

17 MS. GRIMES: In April of 2005.

18 OIG SA GOSSARD: April 2005?

19 MS. GRIMES: Yes.

20 OIG SA GOSSARD: And how long were you out
21 there?

22 MS. GRIMES: Eight months.

23 OIG SA GOSSARD: Eight months?

24 MS. GRIMES: Yes.

25 OIG SA GOSSARD: So that would have been

1 around December 2005?

2 MS. GRIMES: Yes.

3 OIG SA GOSSARD: Okay. And what were your
4 duties out there?

5 MS. GRIMES: My duties were supposed to be
6 to take over the lit support duties that were
7 performed by Valerie Birdsong who was a DOJ
8 contractor. And that would be to -- to take
9 the documents, scan them, be able to pull them
10 when they needed them, and, you know, when they
11 had a particular issue, and they say well we
12 want to see this and this and this, to be able
13 to pull those documents and say well, here they
14 are. And just to manage it. There were
15 several million documents that were there. And
16 that's what my duties were supposed to be when
17 I was assigned out there, so that they could
18 get rid of that expense, because I'm a salaried
19 employee, and I was capable and qualified to do
20 it, but they're paying to keep, you know, a
21 contractor here. So that was the idea and that
22 was the assignment when I went out there.

23 OIG SA GOSSARD: Okay. Did you have any
24 civil duties out there also?

25 MS. GRIMES: Yes. Also my program that

1 I'm hired under is Affirmative Civil, which is
2 fraud against any government program, and I was
3 also there to --

4 OIG SA GOSSARD: So ACE?

5 MS. GRIMES: Yes, ACE. To keep an eye out
6 for potential ACE in the whole ball of wax,
7 because there were several issues at one time
8 going on.

9 OIG SA GOSSARD: Did you make any
10 recoveries as a result of this?

11 MS. GRIMES: Yes and no. There was one
12 recovery that was negotiated in so that the
13 witness could testify. You couldn't put him on
14 the stand if he has a liability. So we found a
15 good bit of federal highway funds that went
16 into that particular gentleman's company, but
17 some negotiation was -- was worked out that I
18 was not a part of.

19 OIG SA GOSSARD: Uh-huh. And while you
20 were out there, were you involved in
21 discussions about that case, that public
22 corruption case involving the former Governor
23 of Alabama and the Health South CEO? Were you
24 involved in discussions with AUSA's and agents,
25 say FBI agents?

1 MS. GRIMES: Only with one FBI agent, and
2 that would be Jim Murray. He asked me to
3 prepare a case map timeline for him on his
4 particular issue, and I worked with him to do
5 that. Other than that, I was not --

6 OIG SA GOSSARD: So you weren't involved
7 in the day-to-day --

8 MS. GRIMES: No.

9 OIG SA GOSSARD: -- dealings with that
10 case?

11 MS. GRIMES: No, I was not.

12 OIG SA GOSSARD: You didn't sit in any
13 meetings where --

14 MS. GRIMES: Sometimes I would sit in
15 meetings. I wasn't invited, you know, to come
16 to the meetings, but I was really trying to
17 do -- to do what they sent out -- sent me out
18 there to do. So I was trying to, you know,
19 learn as much as I could about the case, and it
20 is one big room, but there were stairs going up
21 to the platform where they had the -- you know,
22 the big long table, and they would meet, and
23 AUSA Feaga would always say, you know, men come
24 on up here, and Valerie Birdsong, the -- the
25 contractor, would say you know, go, go, go.

1 And so I would -- I would go, and, you know,
2 sit at the table and take my little note pad.
3 And it -- you know, it's not my first time to
4 be involved in an investigation.

5 OIG SA GOSSARD: Uh-huh.

6 MS. GRIMES: So, I mean, I was prepared to
7 take an active role like I would normally do.
8 But AUSA Feaga did not want me to be there in
9 the -- in the off-site. He did not want be to
10 be assigned to the case. And so what he would
11 do when I would come up there to participate in
12 the meetings is he would wait -- and let's say
13 that you are me, he would wait, and I would sit
14 down right there, and then he would turn his
15 back to me, put his -- I can't put my feet
16 up -- but he would put his feet up, and talk
17 away from me, and if I tried to add anything to
18 the discussion he would talk over me and not
19 allow me to -- to participate. So I would be
20 privy to some discussions, but by and far I was
21 excluded.

22 OIG SA GOSSARD: When did you -- did you
23 initiate your EEO complaint?

24 MS. GRIMES: In July of 2007.

25 OIG SA GOSSARD: Okay. Now, in

1 conjunction with that EEO complaint, did you
2 ever make any audio recordings, tapes to
3 support your EEO complaint without the
4 knowledge or consent of -- of the other party
5 or parties while you were at the off-site
6 location?

7 MS. GRIMES: Can I -- can I have a
8 clarification of that? When you say make audio
9 recordings of someone without their consent,
10 are you talking about what I've heard, you
11 know, from you first, and then --

12 OIG SA GOSSARD: Uh-huh.

13 MS. GRIMES: -- from other people, is that
14 I allegedly made audio recordings of an AUSA?

15 OIG SA GOSSARD: Of anybody. Anybody out
16 there. AUSA's, agents, anybody who was out
17 there. Let's say an employee. Did you, like
18 we're doing right now, we're making a
19 recording --

20 MS. GRIMES: Yes.

21 OIG SA GOSSARD: -- of this meeting.

22 MS. GRIMES: Yes.

23 OIG SA GOSSARD: Did you -- while you were
24 out there, did you make audio recordings of
25 people?

1 MS. GRIMES: I did not.

2 OIG SA GOSSARD: You did not?

3 MS. GRIMES: I did not.

4 OIG SA GOSSARD: Okay. So you never made
5 any audio recordings of anybody out there?

6 MS. GRIMES: Of anybody out there, not
7 ever. Absolutely not.

8 OIG SA GOSSARD: Have you ever made any of
9 any -- let's say at this office -- a DOJ
10 employee?

11 MS. GRIMES: No, I have never.

12 OIG SA GOSSARD: Okay. When you -- when
13 you asked for clarification, why would you need
14 to be clarified or need clarification about
15 that? If -- if somebody asked me that
16 question, you know, I think I would be able to
17 answer it right off.

18 MS. GRIMES: Well, I -- I was just really
19 kind of interested in how it -- how it all came
20 about, because the -- the mediation itself was
21 quite adversarial, and I was not really
22 expecting it to be adversarial, so there were
23 several times when the mediator and I would be
24 having, you know, heated discussions about the
25 evidence. They always wanted to know what is

1 the evidence? What is the evidence? And I
2 would always say I -- I'm a meticulous record
3 keeper. And when she would talk to me she
4 would say, well, so did you record this, and
5 did you record that? And I would say, yes, in
6 the context of recording.

7 OIG SA GOSSARD: Uh-huh.

8 MS. GRIMES: Not audio recording. In the
9 first place it was much too large of a space.
10 I mean, it's -- it's an Air -- it's a big Air
11 Force base thing. And in the second place, if
12 you view my personnel file and everything about
13 me, you will find that I am 100% a rules girl.
14 If there's a rule, I'm going to go by that
15 rule. I'm not ever going to intentionally
16 break a rule, because that is my integrity, my
17 personal integrity.

18 So that's the long explanation to tell you
19 that no, I did not do that, and I would not
20 have done that.

21 OIG SA GOSSARD: Okay. Did you ever
22 record any conversations with Acting U.S.
23 Attorney Louis Franklin?

24 MS. GRIMES: No, I did not.

25 OIG SA GOSSARD: AUSA Steven Feaga?

1 MS. GRIMES: No, I did not. We never even
2 had any conversations.

3 OIG SA GOSSARD: Okay. AUSA J. B., and
4 I'll spell it, P-e-r-r-i-n-e?

5 MS. GRIMES: Perrine.

6 OIG SA GOSSARD: Did you ever make any
7 recordings --

8 MS. GRIMES: Never.

9 OIG SA GOSSARD: -- of any conversations
10 with him? Trial attorney Richard Pilcher
11 (phonetic)?

12 MS. GRIMES: Pilcher? No, I did not.

13 OIG SA GOSSARD: Or Assistant Attorney
14 General -- Assistant Attorneys General Joseph
15 Fitzpatrick or Jenny Garret.

16 MS. GRIMES: No.

17 OIG SA GOSSARD: They're out of the state
18 of Alabama?

19 MS. GRIMES: I did not.

20 OIG SA GOSSARD: Okay. And you stated
21 earlier you've never made any audio recordings
22 of any type of any DOJ employee?

23 MS. GRIMES: Never.

24 OIG SA GOSSARD: Have you made these
25 recordings that I've discussed and have since

1 destroyed them?

2 MS. GRIMES: No, I have not.

3 OIG SA GOSSARD: Okay. Now, you talked a
4 little about this mediation, and we'll get into
5 that now.

6 During this mediation and again it's --
7 the date I got here, it's November 1st of 2007.
8 During that mediation did you tell the mediator
9 Sharon Stokes that you had audio recordings or
10 tapes that supported your allegations for your
11 EEO complaint?

12 MS. GRIMES: No, I did not.

13 OIG SA GOSSARD: You did not tell her that
14 you had either audio recordings or tapes?

15 MS. GRIMES: No. I told her I had very
16 meticulous records. And as I said before she
17 would ask me, do you have a recording of this,
18 and do you have a recording of that? And I
19 responded in a manner that I meant I recorded
20 it. I recorded the event.

21 OIG SA GOSSARD: Uh-huh.

22 MS. GRIMES: Not that I recorded the
23 event. And I remember at one point -- I
24 remember being confused when she asked me this,
25 because she kept going back and talking to

1 management and coming back to me and asking me.
2 It was always about the evidence. I mean, all
3 day long. It was never really about what a
4 mediation is supposed to be about. It was
5 always about the evidence.

6 OIG SA GOSSARD: Uh-huh.

7 MS. GRIMES: She came back to me at one
8 particular time and -- and she said well, like,
9 what would you record? And I said well, you
10 know, like when Steve Feaga said this to me.
11 And I picked out something, I don't even
12 remember, but it was something from my EEO
13 complaint.

14 OIG SA GOSSARD: Uh-huh.

15 MS. GRIMES: But it was not meant to
16 suggest that I was making audio recordings of
17 him or video recordings of him or any other.
18 It meant that I recorded the event.

19 OIG SA GOSSARD: Okay. Did Stokes ask you
20 during the mediation who your witnesses were
21 that could support your complaint?

22 MS. GRIMES: I don't recall if she did or
23 not.

24 OIG SA GOSSARD: You don't recall her
25 asking that?

1 MS. GRIMES: I don't recall if she did or
2 not. I recall, like I said, all day long it
3 was, what is your evidence, what is your
4 evidence, what is your evidence? And we went
5 back and forth over that all day long.

6 OIG SA GOSSARD: Okay. Do you recall
7 responding to her at that time that witnesses
8 wouldn't be necessary because you have
9 recordings or tapes that would provide absolute
10 proof?

11 MS. GRIMES: Absolutely not. Absolutely
12 not. Witnesses will be necessary.

13 OIG SA GOSSARD: Okay. So you didn't make
14 that statement to her?

15 MS. GRIMES: No, I did not.

16 OIG SA GOSSARD: That, you know, you -- we
17 don't need to talk about witnesses, I have -- I
18 have tapes?

19 MS. GRIMES: No. What I said to her is
20 this is not discovery, this is a mediation. We
21 do not need to talk about witnesses at this
22 time. You know, there will be time
23 for discovery.

24 OIG SA GOSSARD: So now you do recall
25 having a conversation with her about witnesses?

1 MS. GRIMES: No. I recall having
2 conversation about the evidence in general.
3 And in the beginning, you know, it was a fairly
4 civil conversation, but as the day went on
5 and -- and she continually asked me, what is
6 your evidence, what is your evidence? Do you
7 have this evidence? Do you have that evidence?
8 You know, I -- I became less responsive to
9 that, because I felt that she was behaving as
10 an advocate for management rather than as a
11 neutral party, and it was supposed to be a
12 non-adversarial proceeding. So at some point I
13 began to answer her to all of her questions
14 about evidence, this is not discovery, this is
15 a mediation.

16 OIG SA GOSSARD: Okay.

17 MS. GRIMES: So do I have specific
18 recollection of her asking me about my
19 witnesses? I do not have a specific
20 recollection, but I can tell you that I would
21 never have made that statement that witnesses
22 aren't necessary. They are necessary in every
23 case.

24 OIG SA GOSSARD: Okay. Do you recall
25 Stokes asking you if she could share with

1 management -- I use your term -- I was going to
2 say agency reps, but we'll call them -- we'll
3 refer to them as management -- and when I say
4 management, I'll lump Mr. Menner in -- in there
5 with that.

6 MS. GRIMES: Yes.

7 OIG SA GOSSARD: So it would be Menner,
8 the U.S. Attorney Ms. Canary, and also the
9 First Assistant Patricia Watson.

10 Do you recall Stokes asking you if she
11 could share your revelation that you had these
12 tapes with management? Do you recall her
13 asking you that?

14 MS. GRIMES: I never made a revelation
15 that I had tapes.

16 OIG SA GOSSARD: Okay. So then your
17 answer is no.

18 MS. GRIMES: Is no.

19 OIG SA GOSSARD: So Stokes never asked you
20 if she could tell management that you just
21 revealed to her --

22 MS. GRIMES: That I had tapes.

23 OIG SA GOSSARD: -- that you had audio
24 recordings?

25 MS. GRIMES: Yeah. Of -- that I had audio

1 recordings. And now we're talking about audio
2 recordings, right?

3 OIG SA GOSSARD: We're talking audio
4 recordings, tape recordings, digital
5 recordings. Whatever you want to call it.
6 Basically what's going on right now.

7 MS. GRIMES: Yes.

8 OIG SA GOSSARD: Our conversation is --

9 MS. GRIMES: Yes.

10 OIG SA GOSSARD: -- being recorded.

11 MS. GRIMES: I just want to clarify that.

12 OIG SA GOSSARD: Okay.

13 MS. GRIMES: You know, no --

14 OIG SA GOSSARD: No?

15 MS. GRIMES: -- I did not.

16 OIG SA GOSSARD: Okay. So, Stokes --
17 Stokes never asked you whether she could go to
18 management and tell them that you just told her
19 you have audiotapes, or you have tapes, or some
20 type of --

21 MS. GRIMES: No, she never did.

22 OIG SA GOSSARD: She never asked you that?

23 MS. GRIMES: No. No. Audiotapes never --

24 that wasn't part of what we discussed. We

25 discussed recordings. We didn't discuss

1 audiotapes of people. We discussed recordings.

2 OIG SA GOSSARD: Written recordings you're
3 talking about?

4 MS. GRIMES: Yes. You know, recordings.

5 OIG SA GOSSARD: That you made in a
6 journal?

7 MS. GRIMES: Yes.

8 OIG SA GOSSARD: Did Stokes ever return
9 back to you after conferring with management?
10 Again, allegedly after you told her you had
11 these tapes, her statement is that she got
12 permission from you to go share that with
13 management, and then she came back and said
14 management wants to listen to these tapes. Do
15 you recall that?

16 MS. GRIMES: I do not.

17 OIG SA GOSSARD: Did -- did that happen?

18 MS. GRIMES: I do not recall that. She
19 came back to me several times after spending
20 time with management and she would ask me about
21 different aspects of different evidence, you
22 know, can I share this?

23 OIG SA GOSSARD: I'm going to pause just
24 for a second. The recorder will still be
25 running.

1 So Stokes never came back to you after
2 conferring with management and said management
3 wants to listen to these tapes? Not read a
4 journal, but actually listen to tapes?

5 MS. GRIMES: She came back to me and --
6 several times and said management would like to
7 view my evidence. Management would like to see
8 my evidence. And I always declined saying that
9 this is not discovery. But you have to
10 understand by this point, I mean, things had
11 degraded a great deal between me and
12 Ms. Stokes, because I felt that she was
13 supposed to be here as a neutral party in a non
14 adversarial proceeding, and it was anything
15 but.

16 I mean, it started off, the first thing
17 out of Mr. Menner's mouth is what is your
18 evidence? Well, that's not what a mediation is
19 about. A mediation is about let's see if we
20 can come to terms --

21 OIG SA GOSSARD: You know, I don't want to
22 get into the in's and out's of mediation, but
23 it would -- but it would seem to me before
24 agency reps, management if you will, can make a
25 decision, you know, I don't think they're just

1 going to show up and sign the check based off
2 of what you claim. I -- I -- you know, I think
3 it would be fair to assume that they want to
4 know what the evidence is, they want to talk to
5 witnesses. They want to -- if they're told
6 there are audiotapes, they want to listen to
7 those audiotapes. You know, I think that's
8 fair. You know, you keep saying that, you
9 know, this is not about the evidence. I don't
10 see how management --

11 MS. GRIMES: It's not about -- it's not --

12 OIG SA GOSSARD: I don't know how
13 management -- again, I don't want to get, you
14 know, long and drawn out about this, but I
15 don't see how they could make a decision if
16 they don't know what the evidence is, whether
17 this is a legitimate claim or not. --And again
18 I'm not speaking to your claim one way or the
19 other, but --

20 MS. GRIMES: So --

21 OIG SA GOSSARD: -- it just, you know,
22 seems to me that, you know, that's a legitimate
23 concern of management to know what the evidence
24 is.

25 MS. GRIMES: Well, and I -- I do

1 understand that, but I also understand that
2 Mr. Menner had been in the district for at
3 least a day interviewing all the other people
4 who had been in the off-site before the
5 mediation. So they went into mediation having
6 at least one side of the story. They had my
7 side of the story and my written complaints.
8 So it's not like they went into it blind. They
9 knew what they were going into.

10 The listed complaint also -- the complaint
11 also lists what you want, you know, what --
12 what your damages are. So they did have the
13 tools necessary. They wanted to go beyond the
14 scope of a mediation --

15 OIG SA GOSSARD: Uh-huh.

16 MS. GRIMES: -- into a full blown
17 investigation. And that was premature at that
18 time.

19 OIG SA GOSSARD: Okay.

20 MS. GRIMES: And that was my point.

21 OIG SA GOSSARD: Alright. And speaking of
22 point -- getting back on point. So, again, I
23 want to make sure this is perfectly clear.
24 Stokes never came back to you and told you that
25 management wanted to listen to the tapes?

1 MS. GRIMES: I have no recollection of her
2 ever coming back to me with that.

3 OIG SA GOSSARD: Now you say there were
4 several back and forths --

5 MS. GRIMES: Yes.

6 OIG SA GOSSARD: -- between Stokes and
7 yourself, and Stokes --

8 MS. GRIMES: Yes.

9 OIG SA GOSSARD: -- and management
10 relaying each other's positions, concerns,
11 questions?

12 MS. GRIMES: Yes.

13 OIG SA GOSSARD: So on so forth. But what
14 you're saying was that was not about tapes,
15 that was about --

16 MS. GRIMES: No.

17 OIG SA GOSSARD: -- evidence?

18 MS. GRIMES: It was about evidence. It
19 was about whether to make a -- an offer. She
20 came back to me one time to say, you know,
21 Ms. Canary does not believe you, she does not
22 believe you have a valid case. She doesn't
23 know Mr. Feaga to be this way, or to behave
24 this way. And she came back another time and
25 she said, you know, they're not interested in

1 making you any -- any kind of offer. And at
2 that point I said well, then I guess we're done
3 with the mediation. But she came back to me
4 again, you know, still coming to me, what's
5 your evidence, what evidence do you have? It
6 was always about evidence, all day long.

7 OIG SA GOSSARD: Uh-huh.

8 MS. GRIMES: She was really pushing me,
9 really putting a lot of pressure on me about
10 the evidence.

11 OIG SA GOSSARD: So if -- if it's
12 basically done at that point -- and I may be
13 jumping ahead of myself, but I'm going to go
14 ahead since you brought it up -- why did they
15 go a second day?

16 MS. GRIMES: They requested it. They
17 requested a second day.

18 OIG SA GOSSARD: They requested a second
19 day. There was no reason?

20 MS. GRIMES: Not that they gave me, there
21 was so reason.

22 OIG SA GOSSARD: Okay. Did you inform
23 Stokes that your attorney had the tapes when
24 she said hey, these guys want to listen to the
25 tapes? Did you tell Stokes that your attorney

1 had the tapes and that you would have to confer
2 with him prior to releasing the tapes?

3 MS. GRIMES: I told Stokes something
4 like -- I want to get this exactly straight,
5 because we had two or three conversations about
6 this. I told Stokes that on advice of counsel,
7 he said, you know, this is not discovery.

8 OIG SA GOSSARD: I'm not talking about a
9 later conversation. I'm talking about during
10 the mediation on November 1st, that day, when
11 Stokes come back and said -- allegedly --
12 management wants to listen to these tapes, did
13 you tell her that your lawyer had the tapes?

14 MS. GRIMES: No, I did not.

15 OIG SA GOSSARD: So you did not tell her
16 that your lawyer had the tapes?

17 MS. GRIMES: No, I did not.

18 OIG SA GOSSARD: So then you didn't tell
19 her that you would need to discuss it with your
20 lawyer prior to releasing the tapes and letting
21 the other side listen to the tapes?

22 MS. GRIMES: I told her that I would need
23 to discuss the whole request to see my evidence
24 with the -- the lawyer, my lawyer.

25 OIG SA GOSSARD: But specifically tapes?

1 MS. GRIMES: Tapes were not specifically
2 mentioned.

3 OIG SA GOSSARD: Okay. So you --

4 MS. GRIMES: We were talking about
5 evidence. The whole evidence. I mean --

6 OIG SA GOSSARD: Uh-huh.

7 MS. GRIMES: -- I have no recollection of
8 her saying anything about well, we want to hear
9 some audiotapes, we want to see some
10 audiotapes, you know, dah dah dah dah. We
11 discussed it as recordings.

12 OIG SA GOSSARD: Uh-huh.

13 MS. GRIMES: Recordings.

14 OIG SA GOSSARD: So --

15 MS. GRIMES: So wherever the term "audio
16 recordings" comes in, that would have to come
17 from Ms. Stokes.

18 OIG SA GOSSARD: Okay. So, in other
19 words, what you're telling me -- again, I may
20 be jumping ahead of myself a little bit, but
21 during -- over the course of these two days,
22 the word "tape", "audio recordings", so on and
23 so forth, never came up at all? Is that what
24 you're telling me?

25 MS. GRIMES: It never came up from me. I

1 don't know what happened with their
2 discussions.

3 OIG SA GOSSARD: Did Stokes --

4 MS. GRIMES: But I know --

5 OIG SA GOSSARD: -- ever say that word to
6 you?

7 MS. GRIMES: I don't recall that. I
8 recall recordings. I recalled her asking me
9 about the recordings.

10 OIG SA GOSSARD: Uh-huh.

11 MS. GRIMES: But I do not recall
12 audiotape.

13 OIG SA GOSSARD: So this --

14 MS. GRIMES: Or audio recordings. I do
15 not recall those -- those terms. I recall
16 evidence. I recall recordings. Recordings.

17 OIG SA GOSSARD: Okay. So the first time
18 ever audio recordings or tapes ever came up in
19 the course of this mediation with you is when I
20 first contacted you --

21 MS. GRIMES: When you called me.

22 OIG SA GOSSARD: -- back in December?

23 MS. GRIMES: When you called me.

24 OIG SA GOSSARD: That's the first time
25 that you ever --

1 MS. GRIMES: That's the first time I ever
2 heard that particular, how would you say, that
3 particular perception that I had tape-recorded
4 an AUSA. The first time that I heard that was
5 from you.

6 OIG SA GOSSARD: Okay. So again, you
7 never told Stokes that you would have to confer
8 with your attorney in order to release the
9 tapes to management?

10 MS. GRIMES: No but -- but I want to be
11 clear on that, we did talk about discussing
12 releasing evidence.

13 OIG SA GOSSARD: Uh-huh.

14 MS. GRIMES: And that I would not be able
15 to do that. Since he was not at mediation with
16 me I would not be able to.

17 OIG SA GOSSARD: And when you talk about
18 evidence, which evidence are you talking about?

19 MS. GRIMES: I'm talking about just my
20 recordings.

21 OIG SA GOSSARD: Your written --

22 MS. GRIMES: You know, just my records.

23 OIG SA GOSSARD: Your written --

24 MS. GRIMES: Yeah.

25 OIG SA GOSSARD: -- notes?

1 MS. GRIMES: All -- you know, anything
2 that I -- that I had written, and it was quite
3 a bit that I had written over the time, and
4 emails, and phone records. I even had phone
5 records where I had called Ms. Watson. So
6 there were -- you know, there were plenty of
7 records.

8 OIG SA GOSSARD: Okay.

9 MS. GRIMES: I just didn't realize when
10 we're talking about recordings, I mean
11 recordings means one thing to me.

12 OIG SA GOSSARD: Uh-huh. So all this time
13 where you're having these, again, over a
14 two-day period back and forth with Stokes
15 and -- and Stokes with management, Stokes is
16 thinking there's audio recordings, the U.S. --

17 MS. GRIMES: I don't know what she's
18 thinking.

19 OIG SA GOSSARD: The U.S. -- well, I'm
20 telling you --

21 MS. GRIMES: Yeah.

22 OIG SA GOSSARD: The U.S. Attorney,
23 Menner, and the First Assistant are all
24 thinking about audio recordings. And all this
25 back and forth, that never got cleared up?

1 MS. GRIMES: No, not -- it never got
2 cleared up.

3 OIG SA GOSSARD: In other words, when I
4 got -- when I got these other witnesses telling
5 me that it was their impression, all four of
6 them, that there were audio recordings, and
7 there's this back and forth, that this never
8 got cleared up, Stokes, you know, when she
9 comes to you and says they want to listen to
10 the tapes, you don't look at her and say what
11 tapes are you talking about, I never said
12 anything about tapes?

13 MS. GRIMES: See, I don't ever recall her
14 ever using the term "tapes" to me. It was
15 always about your recordings, your evidence.
16 It was mostly evidence. You know, she would
17 talk about it evidence, but she would also talk
18 about recording. I never realized that --

19 OIG SA GOSSARD: Well --

20 MS. GRIMES: -- that the -- in their
21 meetings they're talking about something
22 different than what I'm talking about, because
23 the only person that I talked to was Stokes.

24 OIG SA GOSSARD: Got you.

25 MS. GRIMES: It was a one on one, one on

1 one. I have no -- I had no understanding that
2 there was a miscommunication, or a
3 misstatement, or a mis-whatever. Misperception
4 I guess might be the right word, going on in
5 those discussions.

6 OIG SA GOSSARD: Uh-huh.

7 MS. GRIMES: You know, that was not
8 something that ever frankly would have occurred
9 to me.

10 OIG SA GOSSARD: Uh-huh.

11 MS. GRIMES: So, I'm just going along my
12 merry way trying to get away --

13 OIG SA GOSSARD: Okay. Slight pause.
14 Recorder's still running. Okay. We're back.

15 MS. GRIMES: So I'm trying to get away
16 from the talk about the evidence, the talk
17 about the discovery, to the talk about the
18 mediation. - You know, the mediation is -- I
19 mean, believe this or not -- I really would
20 like to move past this point in my life. I
21 mean, this has been going on for a long, long
22 time, and I would like to have some closure.
23 So I'm trying to get it back on track, back to
24 the mediation. I'm very familiar with it -- a
25 mediation. I do collateral duty

1 investigations. I understand.

2 OIG SA GOSSARD: Uh-huh.

3 MS. GRIMES: So, I -- I have one agenda.
4 She has another agenda. There were several
5 times when we had heated exchanges. I know you
6 can appreciate that having -- you know, having
7 had some experience with me. We've had some
8 heated exchanges.

9 OIG SA GOSSARD: Well, I don't know if I
10 would term them like that, but --

11 MS. GRIMES: Well, you know what I mean.
12 I mean, they're -- they're a little -- it's a
13 little more of well, I want to make my point.
14 Well, I want to make my point. Well, I want to
15 make my point. Well, I want to make my point.

16 We had a lot of those over the evidence,
17 over discussions of the evidence.

18 OIG SA GOSSARD: Okay. Yeah, and I -- you
19 know, and I can understand that. What I can't
20 understand is, you know, Stokes going back for
21 whatever reason telling them there's tapes.
22 Menner saying okay, we need to listen to the
23 tapes. And Stokes testifying or saying in her
24 statement, she comes back and says will you let
25 them listen to the tapes? Listen. Okay? That

1 doesn't mean read, like read journal notes, or
2 read, you know, stuff you got -- wrote up about
3 phone conversations you had with the First
4 Assistant.

5 MS. GRIMES: Yeah.

6 OIG SA GOSSARD: Whatever. They're very
7 specific, and they're very adamant, okay, that
8 there's tapes, and it's listen. And for the
9 life of me I can't understand how you can sit
10 here today and all these other people are
11 confused, these four other people are confused
12 about tapes, and that wasn't cleared up during
13 the course over two days with this mediation.
14 And, you know, exact words like listen to
15 tapes. That's not read journal entries.
16 That's quite a big difference.

17 MS. GRIMES: No, you're -- you are -- you
18 are correct in that, but what I would say to
19 you is she did not come to me and say they want
20 to listen to your tapes.

21 OIG SA GOSSARD: Okay.

22 MS. GRIMES: She never came to me and said
23 that.

24 OIG SA GOSSARD: She never came --

25 MS. GRIMES: You know, they would like to

1 have access to your records. They would like
2 to see your evidence is the one that stands out
3 to me. I want to see your evidence. And you
4 know, that brings up a very odd email exchange
5 that I had with Ms. Canary later when I offered
6 to, you know, speak with her about my evidence.
7 And Ms. Canary emailed me back and said, I
8 would like to hear your evidence. And looking
9 back on that now, that should have been a red
10 flag to me.

11 OIG SA GOSSARD: Uh-huh.

12 MS. GRIMES: But I just thought she meant
13 hearing me. Hearing what I had to say.

14 OIG SA GOSSARD: Okay.

15 MS. GRIMES: You know, I can't say that I
16 didn't miss the boat. You know, I can't say
17 that there was not something that I did not
18 pick up, you know, in the conversations, but
19 there was nothing as overt as they want to
20 "listen" to your tapes. There was nothing as
21 overt as that. It was always about couching it
22 in terms of recordings, evidence.

23 OIG SA GOSSARD: I can't understand how
24 you couldn't have picked that up unless -- you
25 know, I just -- I can't understand that. You

MEMORANDUM OF INVESTIGATION

Case Number: 2008-000904	Reporting Office: Atlanta Area Office
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RE: Interview – Paralegal Specialist Tamarah Grimes, USAO, MDAL

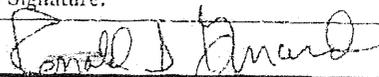
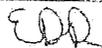
On March 27, 2008, Paralegal Specialist Tamarah Grimes, United States Attorney's Office (USAO), Middle District of Alabama, was interviewed at the USAO in Montgomery, Alabama. OIG Special Agents Ronald Gossard and Phil Van Nimwegen conducted the interview. The interview was conducted in reference to an allegation that Grimes had surreptitiously tape-recorded comments made by co-workers during seven official meetings pertaining to the prosecution of a high profile public corruption case and that the recordings were allegedly made in reference to an Equal Employment Opportunity (EEO) complaint filed by Grimes against one of the co-workers. After being advised of the allegation and her obligation to respond truthfully per OIG Form III-226/3, *Warnings and Assurances to Employee Required to Provide Information*, Grimes provided the following relevant information under oath during her OIG interview, which was tape-recorded:

- Grimes denied ever audio recording any DOJ employee or providing her attorney with any audio recordings.
- Grimes denied telling the mediator, Deputy Chief Sharon Stokes, Civil Division, USAO, Northern District of Georgia, Atlanta, Georgia that she had made any tape recording(s) supporting her EEO allegations during the mediation (November 1-2, 2007).
- According to Grimes, she told Stokes that she had "written recordings" supporting her EEO allegations. Grimes told OIG agents that the word "tapes" was never mentioned during the 2-day mediation process – only recordings or evidence. Grimes stated that there was a misperception or miscommunication between her and Stokes.
- Grimes denied giving Stokes authorization to tell the agency representatives that she had tape recordings, since tapes were never discussed.
- Grimes denied or could not recall Stokes asking her if the agency representatives could listen to the tape recordings. Grimes also denied telling Stokes that she (Grimes) released the tape recordings to her attorney. According to Grimes, she told Stokes that she gave her attorney a copy of her written recordings or notes that showed she was subjected to a hostile environment. Grimes reiterated to OIG investigators that she provided a copy of her contemporaneous notes to her attorney, Scott Boudreaux, Birmingham, Alabama.

Grimes declined to submit to an OIG administered polygraph to verify the truthfulness of her statements.

Attachments:

1. OIG Form III-226/3 - *Warnings and Assurances to Employee Required to Provide Information*.
2. Interview Transcript

Special Agent Name and Signature: Ronald S. Gossard 	Date: 04/14/2008	Reviewer: 
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UNITED STATES DEPARTMENT OF JUSTICE
Office of the Inspector General

WARNINGS AND ASSURANCES TO EMPLOYEE REQUIRED
TO PROVIDE INFORMATION

You are being asked to provide information as part of an inquiry being conducted by the Office of the Inspector General. This inquiry is being conducted pursuant to the Inspector General Act of 1978, as amended.

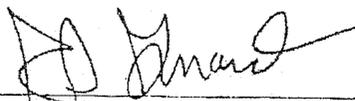
This inquiry pertains to allegations of unauthorized disclosure of sensitive law enforcement information.

You have a duty to reply to the questions posed to you during this interview and agency disciplinary action, including dismissal, may be undertaken if you refuse to answer or fail to reply fully and truthfully.

Neither your answers nor any information or evidence gained by reason of your answers can be used against you in any criminal proceeding. However, if you knowingly and willfully provide false statements or information in your answers, you may be criminally prosecuted for that action. The answers you furnish and any information or evidence resulting therefrom may be used in the course of agency disciplinary proceedings.

ACKNOWLEDGMENT

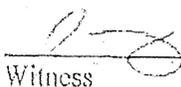
I have read and understand my rights and obligations as set forth above.



Office of the Inspector General
Special Agent



Employee's Signature



Witness

3/27/08

Date

11:04 A.M. (CT)

Time

Montgomery, AL

Place

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AUDIOTAPED
SWORN STATEMENT
OF
TAMARA GRIMES
OIG CASE# 2008-000904

DEPARTMENT OF JUSTICE
OFFICE OF THE INSPECTOR GENERAL
MARCH 27TH, 2008

1 APPEARANCES:

2

3 OFFICE OF THE INSPECTOR GENERAL

4 BY: SPECIAL AGENT RON S. GOSSARD

5 BY: SPECIAL AGENT PHIL VAN NIMWEGEN

6

7 WITNESS:

8 TAMARA GRIMES

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1 OIG SA GOSSARD: This is Special Agent Ron
2 Gossard with the United States Department of
3 Justice, Office of the Inspector General.
4 Today's date is March 27th, 2008. The time is
5 approximately 11:00 a.m. Central Time.

6 Also present is Special Agent Phil Van
7 Nimwegen, and also Paralegal Specialist Tamara
8 Grimes.

9 We're here today to conduct an
10 administrative interview of Ms. Grimes.
11 Ms. Grimes is the subject of the investigation.
12 The interview is being conducted at the -- in
13 Montgomery, Alabama, at the U.S. Attorney's
14 Office.

15 At this time, Ms. Grimes, if you would
16 please stand and raise your right hand.

17 If you -- are you okay? You can sit.

18 MS. GRIMES: Yeah -- no, I can stand,
19 that's okay.

20 OIG SA GOSSARD: DO YOU SWEAR OR AFFIRM
21 THAT THE STATEMENT YOU'RE ABOUT TO GIVE SHALL
22 BE TRUE AND CORRECT TO THE BEST OF YOUR
23 KNOWLEDGE AND BELIEF?

24 MS. GRIMES: I do.

25 OIG SA GOSSARD: Okay. Please be seated.

1 Alright, Ms. Grimes, before we get into any
2 questions like we discussed on the phone the
3 other day I have a Kalkines Warning Form here.
4 I'll read that to you, the pertinent parts, and
5 then I'll give you an opportunity to look it
6 over prior to signing it.

7 "You are being asked to provide
8 information as part of an inquiry being
9 conducted by the Office of the Inspector
10 General.

11 "This inquiry is being conducted pursuant
12 to the Inspector General Act of 1978 as
13 amended. This inquiry pertains to allegations
14 of Unauthorized Disclosure of Sensitive Law
15 Enforcement Information.

16 "You have a duty to reply to the questions
17 posed to you during this interview. And agency
18 disciplinary action, including dismissal, may
19 be undertaken if you refuse to answer or fail
20 to reply fully and truthfully.

21 "Neither your answers nor any information
22 or evidence gained by reason of your answers
23 can be used against you in any criminal
24 proceeding.

25 "However, if you knowingly and willfully

1 provide false statements or information in your
2 answers, you may be criminally prosecuted for
3 that action.

4 "The answers you furnish and any
5 information or evidence resulting therefrom may
6 be used in the course of agency disciplinary
7 proceedings."

8 And then down below there's an
9 Acknowledgement we'll get into.

10 I'm going to go ahead and sign this now.
11 I'll have Mr. Nimwegen witness it.

12 And, Tamara, if you would please take your
13 time, read over that, and let me know if you
14 have any questions.

15 MS. GRIMES: -- push me up.

16 OIG SA VAN NIMWEGEN: Of course.

17 MS. GRIMES: So I can reach. Sorry.

18 OIG SA VAN NIMWEGEN: That's all right.

19 MS. GRIMES: Thank you.

20 OIG SA VAN NIMWEGEN: How's that?

21 MS. GRIMES: That's good, thank you.

22 OIG SA GOSSARD: Any questions, Tamara?

23 MS. GRIMES: No.

24 OIG SA GOSSARD: Okay. Just a few admin
25 notes before we get started with the actual

1 questioning. If you need to take a break at
2 any time during the interview, just let me
3 know, and of course we'll make that happen.

4 You stated that occasionally you need to
5 get up, stand up. Feel free to do that at any
6 time.

7 I would ask that when I ask the question,
8 that you let me ask the question. And when you
9 answer the question, I'm going to let you
10 answer the question unless we are kind of
11 getting off the mark, and then I may halt you
12 at that time and redirect.

13 Also I noticed you kind of talk, unlike
14 myself, in a soft voice. I would ask that you,
15 you know, try to speak up so that the recorder
16 does pick that up.

17 Is there anything today that would impact
18 your memory, your recollection of events? Are
19 you taking any types of medications that could
20 possibly affect your recall?

21 MS. GRIMES: I specifically did not take
22 any pain medication today, so --

23 OIG SA GOSSARD: Okay.

24 MS. GRIMES: -- that I would be able to
25 speak to you clearly.

1 OIG SA GOSSARD: Okay. And so you -- and
2 of course you're not under the influence of
3 drugs or alcohol --

4 MS. GRIMES: No.

5 OIG SA GOSSARD: -- at this time? Okay.

6 Also standard, do you have any recording
7 devices on your person --

8 MS. GRIMES: No.

9 OIG SA GOSSARD: -- at this time? Okay.
10 And of course no weapons?

11 MS. GRIMES: No weapons.

12 OIG SA GOSSARD: Okay. Alright. And
13 we'll -- I'm going to start out with a couple
14 of background questions, Tamara.

15 First, if you would, when did you join the
16 U.S. Attorney's Office?

17 MS. GRIMES: April 20th, 2003.

18 OIG SA GOSSARD: Okay. And you worked
19 your whole time with the federal government
20 here at the -- in the Middle District of
21 Alabama?

22 MS. GRIMES: Yes.

23 OIG SA GOSSARD: Okay. And what -- what
24 are your duties?

25 MS. GRIMES: My duties that I actually do

1 or my duties from my workplan?

2 OIG SA GOSSARD: Okay. Generally
3 speaking, you're I understand a paralegal
4 specialist?

5 MS. GRIMES: Yes, uh-huh.

6 OIG SA GOSSARD: Okay. And you work in
7 the Civil Division?

8 MS. GRIMES: I do work in the Civil
9 Division. I spend a lot more time doing
10 collateral duty assignments for the Executive
11 Office of the U.S. Attorney's and EEO Division.
12 I spend more time doing duties for that than I
13 do actually to my assigned duties here.

14 OIG SA GOSSARD: Okay. And when did you
15 get moved to a off-site location for this high
16 profile public corruption case?

17 MS. GRIMES: In April of 2005.

18 OIG SA GOSSARD: April 2005?

19 MS. GRIMES: Yes.

20 OIG SA GOSSARD: And how long were you out
21 there?

22 MS. GRIMES: Eight months.

23 OIG SA GOSSARD: Eight months?

24 MS. GRIMES: Yes.

25 OIG SA GOSSARD: So that would have been

1 around December 2005?

2 MS. GRIMES: Yes.

3 OIG SA GOSSARD: Okay. And what were your
4 duties out there?

5 MS. GRIMES: My duties were supposed to be
6 to take over the lit support duties that were
7 performed by Valerie Birdsong who was a DOJ
8 contractor. And that would be to -- to take
9 the documents, scan them, be able to pull them
10 when they needed them, and, you know, when they
11 had a particular issue, and they say well we
12 want to see this and this and this, to be able
13 to pull those documents and say well, here they
14 are. And just to manage it. There were
15 several million documents that were there. And
16 that's what my duties were supposed to be when
17 I was assigned out there, so that they could
18 get rid of that expense, because I'm a salaried
19 employee, and I was capable and qualified to do
20 it, but they're paying to keep, you know, a
21 contractor here. So that was the idea and that
22 was the assignment when I went out there.

23 OIG SA GOSSARD: Okay. Did you have any
24 civil duties out there also?

25 MS. GRIMES: Yes. Also my program that

1 I'm hired under is Affirmative Civil, which is
2 fraud against any government program, and I was
3 also there to --

4 OIG SA GOSSARD: So ACE?

5 MS. GRIMES: Yes, ACE. To keep an eye out
6 for potential ACE in the whole ball of wax,
7 because there were several issues at one time
8 going on.

9 OIG SA GOSSARD: Did you make any
10 recoveries as a result of this?

11 MS. GRIMES: Yes and no. There was one
12 recovery that was negotiated in so that the
13 witness could testify. You couldn't put him on
14 the stand if he has a liability. So we found a
15 good bit of federal highway funds that went
16 into that particular gentleman's company, but
17 some negotiation was -- was worked out that I
18 was not a part of.

19 OIG SA GOSSARD: Uh-huh. And while you
20 were out there, were you involved in
21 discussions about that case, that public
22 corruption case involving the former Governor
23 of Alabama and the Health South CEO? Were you
24 involved in discussions with AUSA's and agents,
25 say FBI agents?

1 MS. GRIMES: Only with one FBI agent, and
2 that would be Jim Murray. He asked me to
3 prepare a case map timeline for him on his
4 particular issue, and I worked with him to do
5 that. Other than that, I was not --

6 OIG SA GOSSARD: So you weren't involved
7 in the day-to-day --

8 MS. GRIMES: No.

9 OIG SA GOSSARD: -- dealings with that
10 case?

11 MS. GRIMES: No, I was not.

12 OIG SA GOSSARD: You didn't sit in any
13 meetings where --

14 MS. GRIMES: Sometimes I would sit in
15 meetings. I wasn't invited, you know, to come
16 to the meetings, but I was really trying to
17 do -- to do what they sent out -- sent me out
18 there to do. So I was trying to, you know,
19 learn as much as I could about the case, and it
20 is one big room, but there were stairs going up
21 to the platform where they had the -- you know,
22 the big long table, and they would meet, and
23 AUSA Feaga would always say, you know, men come
24 on up here, and Valerie Birdsong, the -- the
25 contractor, would say you know, go, go, go.

1 And so I would -- I would go, and, you know,
2 sit at the table and take my little note pad.
3 And it -- you know, it's not my first time to
4 be involved in an investigation.

5 OIG SA GOSSARD: Uh-huh.

6 MS. GRIMES: So, I mean, I was prepared to
7 take an active role like I would normally do.
8 But AUSA Feaga did not want me to be there in
9 the -- in the off-site. He did not want be to
10 be assigned to the case. And so what he would
11 do when I would come up there to participate in
12 the meetings is he would wait -- and let's say
13 that you are me, he would wait, and I would sit
14 down right there, and then he would turn his
15 back to me, put his -- I can't put my feet
16 up -- but he would put his feet up, and talk
17 away from me, and if I tried to add anything to
18 the discussion he would talk over me and not
19 allow me to -- to participate. So I would be
20 privy to some discussions, but by and far I was
21 excluded.

22 OIG SA GOSSARD: When did you -- did you
23 initiate your EEO complaint?

24 MS. GRIMES: In July of 2007.

25 OIG SA GOSSARD: Okay. Now, in

1 conjunction with that EEO complaint, did you
2 ever make any audio recordings, tapes to
3 support your EEO complaint without the
4 knowledge or consent of -- of the other party
5 or parties while you were at the off-site
6 location?

7 MS. GRIMES: Can I -- can I have a
8 clarification of that? When you say make audio
9 recordings of someone without their consent,
10 are you talking about what I've heard, you
11 know, from you first, and then --

12 OIG SA GOSSARD: Uh-huh.

13 MS. GRIMES: -- from other people, is that
14 I allegedly made audio recordings of an AUSA?

15 OIG SA GOSSARD: Of anybody. Anybody out
16 there. AUSA's, agents, anybody who was out
17 there. Let's say an employee. Did you, like
18 we're doing right now, we're making a
19 recording --

20 MS. GRIMES: Yes.

21 OIG SA GOSSARD: -- of this meeting.

22 MS. GRIMES: Yes.

23 OIG SA GOSSARD: Did you -- while you were
24 out there, did you make audio recordings of
25 people?

1 MS. GRIMES: I did not.

2 OIG SA GOSSARD: You did not?

3 MS. GRIMES: I did not.

4 OIG SA GOSSARD: Okay. So you never made
5 any audio recordings of anybody out there?

6 MS. GRIMES: Of anybody out there, not
7 ever. Absolutely not.

8 OIG SA GOSSARD: Have you ever made any of
9 any -- let's say at this office -- a DOJ
10 employee?

11 MS. GRIMES: No, I have never.

12 OIG SA GOSSARD: Okay. When you -- when
13 you asked for clarification, why would you need
14 to be clarified or need clarification about
15 that? If -- if somebody asked me that
16 question, you know, I think I would be able to
17 answer it right off.

18 MS. GRIMES: Well, I -- I was just really
19 kind of interested in how it -- how it all came
20 about, because the -- the mediation itself was
21 quite adversarial, and I was not really
22 expecting it to be adversarial, so there were
23 several times when the mediator and I would be
24 having, you know, heated discussions about the
25 evidence. They always wanted to know what is

1 the evidence? What is the evidence? And I
2 would always say I -- I'm a meticulous record
3 keeper. And when she would talk to me she
4 would say, well, so did you record this, and
5 did you record that? And I would say, yes, in
6 the context of recording.

7 OIG SA GOSSARD: Uh-huh.

8 MS. GRIMES: Not audio recording. In the
9 first place it was much too large of a space.
10 I mean, it's -- it's an Air -- it's a big Air
11 Force base thing. And in the second place, if
12 you view my personnel file and everything about
13 me, you will find that I am 100% a rules girl.
14 If there's a rule, I'm going to go by that
15 rule. I'm not ever going to intentionally
16 break a rule, because that is my integrity, my
17 personal integrity.

18 So that's the long explanation to tell you
19 that no, I did not do that, and I would not
20 have done that.

21 OIG SA GOSSARD: Okay. Did you ever
22 record any conversations with Acting U.S.
23 Attorney Louis Franklin?

24 MS. GRIMES: No, I did not.

25 OIG SA GOSSARD: AUSA Steven Feaga?

1 MS. GRIMES: No, I did not. We never even
2 had any conversations.

3 OIG SA GOSSARD: Okay. AUSA J. B., and
4 I'll spell it, P-e-r-r-i-n-e?

5 MS. GRIMES: Perrine.

6 OIG SA GOSSARD: Did you ever make any
7 recordings --

8 MS. GRIMES: Never.

9 OIG SA GOSSARD: -- of any conversations
10 with him? Trial attorney Richard Pilcher
11 (phonetic)?

12 MS. GRIMES: Pilcher? No, I did not.

13 OIG SA GOSSARD: Or Assistant Attorney
14 General -- Assistant Attorneys General Joseph
15 Fitzpatrick or Jenny Garret.

16 MS. GRIMES: No.

17 OIG SA GOSSARD: They're out of the state
18 of Alabama?

19 MS. GRIMES: I did not.

20 OIG SA GOSSARD: Okay. And you stated
21 earlier you've never made any audio recordings
22 of any type of any DOJ employee?

23 MS. GRIMES: Never.

24 OIG SA GOSSARD: Have you made these
25 recordings that I've discussed and have since

1 destroyed them?

2 MS. GRIMES: No, I have not.

3 OIG SA GOSSARD: Okay. Now, you talked a
4 little about this mediation, and we'll get into
5 that now.

6 During this mediation and again it's --
7 the date I got here, it's November 1st of 2007.
8 During that mediation did you tell the mediator
9 Sharon Stokes that you had audio recordings or
10 tapes that supported your allegations for your
11 EEO complaint?

12 MS. GRIMES: No, I did not.

13 OIG SA GOSSARD: You did not tell her that
14 you had either audio recordings or tapes?

15 MS. GRIMES: No. I told her I had very
16 meticulous records. And as I said before she
17 would ask me, do you have a recording of this,
18 and do you have a recording of that? And I
19 responded in a manner that I meant I recorded
20 it. I recorded the event.

21 OIG SA GOSSARD: Uh-huh.

22 MS. GRIMES: Not that I recorded the
23 event. And I remember at one point -- I
24 remember being confused when she asked me this,
25 because she kept going back and talking to

1 management and coming back to me and asking me.
2 It was always about the evidence. I mean, all
3 day long. It was never really about what a
4 mediation is supposed to be about. It was
5 always about the evidence.

6 OIG SA GOSSARD: Uh-huh.

7 MS. GRIMES: She came back to me at one
8 particular time and -- and she said well, like,
9 what would you record? And I said well, you
10 know, like when Steve Feaga said this to me.
11 And I picked out something, I don't even
12 remember, but it was something from my EEO
13 complaint.

14 OIG SA GOSSARD: Uh-huh.

15 MS. GRIMES: But it was not meant to
16 suggest that I was making audio recordings of
17 him or video recordings of him or any other.
18 It meant that I recorded the event.

19 OIG SA GOSSARD: Okay. Did Stokes ask you
20 during the mediation who your witnesses were
21 that could support your complaint?

22 MS. GRIMES: I don't recall if she did or
23 not.

24 OIG SA GOSSARD: You don't recall her
25 asking that?

1 MS. GRIMES: I don't recall if she did or
2 not. I recall, like I said, all day long it
3 was, what is your evidence, what is your
4 evidence, what is your evidence? And we went
5 back and forth over that all day long.

6 OIG SA GOSSARD: Okay. Do you recall
7 responding to her at that time that witnesses
8 wouldn't be necessary because you have
9 recordings or tapes that would provide absolute
10 proof?

11 MS. GRIMES: Absolutely not. Absolutely
12 not. Witnesses will be necessary.

13 OIG SA GOSSARD: Okay. So you didn't make
14 that statement to her?

15 MS. GRIMES: No, I did not.

16 OIG SA GOSSARD: That, you know, you -- we
17 don't need to talk about witnesses, I have -- I
18 have tapes?

19 MS. GRIMES: No. What I said to her is
20 this is not discovery, this is a mediation. We
21 do not need to talk about witnesses at this
22 time. You know, there will be time
23 for discovery.

24 OIG SA GOSSARD: So now you do recall
25 having a conversation with her about witnesses?

1 MS. GRIMES: No. I recall having
2 conversation about the evidence in general.
3 And in the beginning, you know, it was a fairly
4 civil conversation, but as the day went on
5 and -- and she continually asked me, what is
6 your evidence, what is your evidence? Do you
7 have this evidence? Do you have that evidence?
8 You know, I -- I became less responsive to
9 that, because I felt that she was behaving as
10 an advocate for management rather than as a
11 neutral party, and it was supposed to be a
12 non-adversarial proceeding. So at some point I
13 began to answer her to all of her questions
14 about evidence, this is not discovery, this is
15 a mediation.

16 OIG SA GOSSARD: Okay.

17 MS. GRIMES: So do I have specific
18 recollection of her asking me about my
19 witnesses? I do not have a specific
20 recollection, but I can tell you that I would
21 never have made that statement that witnesses
22 aren't necessary. They are necessary in every
23 case.

24 OIG SA GOSSARD: Okay. Do you recall
25 Stokes asking you if she could share with

1 management -- I use your term -- I was going to
2 say agency reps, but we'll call them -- we'll
3 refer to them as management -- and when I say
4 management, I'll lump Mr. Menner in -- in there
5 with that.

6 MS. GRIMES: Yes.

7 OIG SA GOSSARD: So it would be Menner,
8 the U.S. Attorney Ms. Canary, and also the
9 First Assistant Patricia Watson.

10 Do you recall Stokes asking you if she
11 could share your revelation that you had these
12 tapes with management? Do you recall her
13 asking you that?

14 MS. GRIMES: I never made a revelation
15 that I had tapes.

16 OIG SA GOSSARD: Okay. So then your
17 answer is no.

18 MS. GRIMES: Is no.

19 OIG SA GOSSARD: So Stokes never asked you
20 if she could tell management that you just
21 revealed to her --

22 MS. GRIMES: That I had tapes.

23 OIG SA GOSSARD: -- that you had audio
24 recordings?

25 MS. GRIMES: Yeah. Of -- that I had audio

1 recordings. And now we're talking about audio
2 recordings, right?

3 OIG SA GOSSARD: We're talking audio
4 recordings, tape recordings, digital
5 recordings. Whatever you want to call it.
6 Basically what's going on right now.

7 MS. GRIMES: Yes.

8 OIG SA GOSSARD: Our conversation is --

9 MS. GRIMES: Yes.

10 OIG SA GOSSARD: -- being recorded.

11 MS. GRIMES: I just want to clarify that.

12 OIG SA GOSSARD: Okay.

13 MS. GRIMES: You know, no --

14 OIG SA GOSSARD: No?

15 MS. GRIMES: -- I did not.

16 OIG SA GOSSARD: Okay. So, Stokes --
17 Stokes never asked you whether she could go to
18 management and tell them that you just told her
19 you have audiotapes, or you have tapes, or some
20 type of --

21 MS. GRIMES: No, she never did.

22 OIG SA GOSSARD: She never asked you that?

23 MS. GRIMES: No. No. Audiotapes never --

24 that wasn't part of what we discussed. We

25 discussed recordings. We didn't discuss

1 audiotapes of people. We discussed recordings.

2 OIG SA GOSSARD: Written recordings you're
3 talking about?

4 MS. GRIMES: Yes. You know, recordings.

5 OIG SA GOSSARD: That you made in a
6 journal?

7 MS. GRIMES: Yes.

8 OIG SA GOSSARD: Did Stokes ever return
9 back to you after conferring with management?
10 Again, allegedly after you told her you had
11 these tapes, her statement is that she got
12 permission from you to go share that with
13 management, and then she came back and said
14 management wants to listen to these tapes. Do
15 you recall that?

16 MS. GRIMES: I do not.

17 OIG SA GOSSARD: Did -- did that happen?

18 MS. GRIMES: I do not recall that. She
19 came back to me several times after spending
20 time with management and she would ask me about
21 different aspects of different evidence, you
22 know, can I share this?

23 OIG SA GOSSARD: I'm going to pause just
24 for a second. The recorder will still be
25 running.

1 So Stokes never came back to you after
2 conferring with management and said management
3 wants to listen to these tapes? Not read a
4 journal, but actually listen to tapes?

5 MS. GRIMES: She came back to me and --
6 several times and said management would like to
7 view my evidence. Management would like to see
8 my evidence. And I always declined saying that
9 this is not discovery. But you have to
10 understand by this point, I mean, things had
11 degraded a great deal between me and
12 Ms. Stokes, because I felt that she was
13 supposed to be here as a neutral party in a non
14 adversarial proceeding, and it was anything
15 but.

16 I mean, it started off, the first thing
17 out of Mr. Menner's mouth is what is your
18 evidence? Well, that's not what a mediation is
19 about. A mediation is about let's see if we
20 can come to terms --

21 OIG SA GOSSARD: You know, I don't want to
22 get into the in's and out's of mediation, but
23 it would -- but it would seem to me before
24 agency reps, management if you will, can make a
25 decision, you know, I don't think they're just

1 going to show up and sign the check based off
2 of what you claim. I -- I -- you know, I think
3 it would be fair to assume that they want to
4 know what the evidence is, they want to talk to
5 witnesses. They want to -- if they're told
6 there are audiotapes, they want to listen to
7 those audiotapes. You know, I think that's
8 fair. You know, you keep saying that, you
9 know, this is not about the evidence. I don't
10 see how management --

11 MS. GRIMES: It's not about -- it's not --

12 OIG SA GOSSARD: I don't know how
13 management -- again, I don't want to get, you
14 know, long and drawn out about this, but I
15 don't see how they could make a decision if
16 they don't know what the evidence is, whether
17 this is a legitimate claim or not. And again
18 I'm not speaking to your claim one way or the
19 other, but --

20 MS. GRIMES: So --

21 OIG SA GOSSARD: -- it just, you know,
22 seems to me that, you know, that's a legitimate
23 concern of management to know what the evidence
24 is.

25 MS. GRIMES: Well, and I -- I do

1 understand that, but I also understand that
2 Mr. Menner had been in the district for at
3 least a day interviewing all the other people
4 who had been in the off-site before the
5 mediation. So they went into mediation having
6 at least one side of the story. They had my
7 side of the story and my written complaints.
8 So it's not like they went into it blind. They
9 knew what they were going into.

10 The listed complaint also -- the complaint
11 also lists what you want, you know, what --
12 what your damages are. So they did have the
13 tools necessary. They wanted to go beyond the
14 scope of a mediation --

15 OIG SA GOSSARD: Uh-huh.

16 MS. GRIMES: -- into a full blown
17 investigation. And that was premature at that
18 time.

19 OIG SA GOSSARD: Okay.

20 MS. GRIMES: And that was my point.

21 OIG SA GOSSARD: Alright. And speaking of
22 point -- getting back on point. So, again, I
23 want to make sure this is perfectly clear.
24 Stokes never came back to you and told you that
25 management wanted to listen to the tapes?

1 MS. GRIMES: I have no recollection of her
2 ever coming back to me with that.

3 OIG SA GOSSARD: Now you say there were
4 several back and forths --

5 MS. GRIMES: Yes.

6 OIG SA GOSSARD: -- between Stokes and
7 yourself, and Stokes --

8 MS. GRIMES: Yes.

9 OIG SA GOSSARD: -- and management
10 relaying each other's positions, concerns,
11 questions?

12 MS. GRIMES: Yes.

13 OIG SA GOSSARD: So on so forth. But what
14 you're saying was that was not about tapes,
15 that was about --

16 MS. GRIMES: No.

17 OIG SA GOSSARD: -- evidence?

18 MS. GRIMES: It was about evidence. It
19 was about whether to make a -- an offer. She
20 came back to me onetime to say, you know,
21 Ms. Canary does not believe you, she does not
22 believe you have a valid case. She doesn't
23 know Mr. Feaga to be this way, or to behave
24 this way. And she came back another time and
25 she said, you know, they're not interested in

1 making you any -- any kind of offer. And at
2 that point I said well, then I guess we're done
3 with the mediation. But she came back to me
4 again, you know, still coming to me, what's
5 your evidence, what evidence do you have? It
6 was always about evidence, all day long.

7 OIG SA GOSSARD: Uh-huh.

8 MS. GRIMES: She was really pushing me,
9 really putting a lot of pressure on me about
10 the evidence.

11 OIG SA GOSSARD: So if -- if it's
12 basically done at that point -- and I may be
13 jumping ahead of myself, but I'm going to go
14 ahead since you brought it up -- why did they
15 go a second day?

16 MS. GRIMES: They requested it. They
17 requested a second day.

18 OIG SA GOSSARD: They requested a second
19 day. There was no reason?

20 MS. GRIMES: Not that they gave me, there
21 was so reason.

22 OIG SA GOSSARD: Okay. Did you inform
23 Stokes that your attorney had the tapes when
24 she said hey, these guys want to listen to the
25 tapes? Did you tell Stokes that your attorney

1 had the tapes and that you would have to confer
2 with him prior to releasing the tapes?

3 MS. GRIMES: I told Stokes something
4 like -- I want to get this exactly straight,
5 because we had two or three conversations about
6 this. I told Stokes that on advice of counsel,
7 he said, you know, this is not discovery.

8 OIG SA GOSSARD: I'm not talking about a
9 later conversation. I'm talking about during
10 the mediation on November 1st, that day, when
11 Stokes come back and said -- allegedly --
12 management wants to listen to these tapes, did
13 you tell her that your lawyer had the tapes?

14 MS. GRIMES: No, I did not.

15 OIG SA GOSSARD: So you did not tell her
16 that your lawyer had the tapes?

17 MS. GRIMES: No, I did not.

18 OIG SA GOSSARD: So then you didn't tell
19 her that you would need to discuss it with your
20 lawyer prior to releasing the tapes and letting
21 the other side listen to the tapes?

22 MS. GRIMES: I told her that I would need
23 to discuss the whole request to see my evidence
24 with the -- the lawyer, my lawyer.

25 OIG SA GOSSARD: But specifically tapes?

1 MS. GRIMES: Tapes were not specifically
2 mentioned.

3 OIG SA GOSSARD: Okay. So you --

4 MS. GRIMES: We were talking about
5 evidence. The whole evidence. I mean --

6 OIG SA GOSSARD: Uh-huh.

7 MS. GRIMES: -- I have no recollection of
8 her saying anything about well, we want to hear
9 some audiotapes, we want to see some
10 audiotapes, you know, dah dah dah dah. We
11 discussed it as recordings.

12 OIG SA GOSSARD: Uh-huh.

13 MS. GRIMES: Recordings.

14 OIG SA GOSSARD: So --

15 MS. GRIMES: So wherever the term "audio
16 recordings" comes in, that would have to come
17 from Ms. Stokes.

18 OIG SA GOSSARD: Okay. So, in other
19 words, what you're telling me -- again, I may
20 be jumping ahead of myself a little bit, but
21 during -- over the course of these two days,
22 the word "tape", "audio recordings", so on and
23 so forth, never came up at all? Is that what
24 you're telling me?

25 MS. GRIMES: It never came up from me. I

1 don't know what happened with their
2 discussions.

3 OIG SA GOSSARD: Did Stokes --

4 MS. GRIMES: But I know --

5 OIG SA GOSSARD: -- ever say that word to
6 you?

7 MS. GRIMES: I don't recall that. I
8 recall recordings. I recalled her asking me
9 about the recordings.

10 OIG SA GOSSARD: Uh-huh.

11 MS. GRIMES: But I do not recall
12 audiotape.

13 OIG SA GOSSARD: So this --

14 MS. GRIMES: Or audio recordings. I do
15 not recall those -- those terms. I recall
16 evidence. I recall recordings. Recordings.

17 OIG SA GOSSARD: Okay. So the first time
18 ever audio recordings or tapes ever came up in
19 the course of this mediation with you is when I
20 first contacted you --

21 MS. GRIMES: When you called me.

22 OIG SA GOSSARD: -- back in December?

23 MS. GRIMES: When you called me.

24 OIG SA GOSSARD: That's the first time
25 that you ever --

1 MS. GRIMES: That's the first time I ever
2 heard that particular, how would you say, that
3 particular perception that I had tape-recorded
4 an AUSA. The first time that I heard that was
5 from you.

6 OIG SA GOSSARD: Okay. So again, you
7 never told Stokes that you would have to confer
8 with your attorney in order to release the
9 tapes to management?

10 MS. GRIMES: No but -- but I want to be
11 clear on that, we did talk about discussing
12 releasing evidence.

13 OIG SA GOSSARD: Uh-huh.

14 MS. GRIMES: And that I would not be able
15 to do that. Since he was not at mediation with
16 me I would not be able to.

17 OIG SA GOSSARD: And when you talk about
18 evidence, which evidence are you talking about?

19 MS. GRIMES: I'm talking about just my
20 recordings.

21 OIG SA GOSSARD: Your written --

22 MS. GRIMES: You know, just my records.

23 OIG SA GOSSARD: Your written --

24 MS. GRIMES: Yeah.

25 OIG SA GOSSARD: -- notes?

1 MS. GRIMES: All -- you know, anything
2 that I -- that I had written, and it was quite
3 a bit that I had written over the time, and
4 emails, and phone records. I even had phone
5 records where I had called Ms. Watson. So
6 there were -- you know, there were plenty of
7 records.

8 OIG SA GOSSARD: Okay.

9 MS. GRIMES: I just didn't realize when
10 we're talking about recordings, I mean
11 recordings means one thing to me.

12 OIG SA GOSSARD: Uh-huh. So all this time
13 where you're having these, again, over a
14 two-day period back and forth with Stokes
15 and -- and Stokes with management, Stokes is
16 thinking there's audio recordings, the U.S. --

17 MS. GRIMES: I don't know what she's
18 thinking.

19 OIG SA GOSSARD: The U.S. -- well, I'm
20 telling you --

21 MS. GRIMES: Yeah.

22 OIG SA GOSSARD: The U.S. Attorney,
23 Menner, and the First Assistant are all
24 thinking about audio recordings. And all this
25 back and forth, that never got cleared up?

1 MS. GRIMES: No, not -- it never got
2 cleared up.

3 OIG SA GOSSARD: In other words, when I
4 got -- when I got these other witnesses telling
5 me that it was their impression, all four of
6 them, that there were audio recordings, and
7 there's this back and forth, that this never
8 got cleared up, Stokes, you know, when she
9 comes to you and says they want to listen to
10 the tapes, you don't look at her and say what
11 tapes are you talking about, I never said
12 anything about tapes?

13 MS. GRIMES: See, I don't ever recall her
14 ever using the term "tapes" to me. It was
15 always about your recordings, your evidence.
16 It was mostly evidence. You know, she would
17 talk about it evidence, but she would also talk
18 about recording. I never realized that --

19 OIG SA GOSSARD: Well --

20 MS. GRIMES: -- that the -- in their
21 meetings they're talking about something
22 different than what I'm talking about, because
23 the only person that I talked to was Stokes.

24 OIG SA GOSSARD: Got you.

25 MS. GRIMES: It was a one on one, one on

1 one. I have no -- I had no understanding that
2 there was a miscommunication, or a
3 misstatement, or a mis-whatever. Misperception
4 I guess might be the right word, going on in
5 those discussions.

6 OIG SA GOSSARD: Uh-huh.

7 MS. GRIMES: You know, that was not
8 something that ever frankly would have occurred
9 to me.

10 OIG SA GOSSARD: Uh-huh.

11 MS. GRIMES: So, I'm just going along my
12 merry way trying to get away --

13 OIG SA GOSSARD: Okay. Slight pause.
14 Recorder's still running. Okay. We're back.

15 MS. GRIMES: So I'm trying to get away
16 from the talk about the evidence, the talk
17 about the discovery, to the talk about the
18 mediation. You know, the mediation is -- I
19 mean, believe this or not -- I really would
20 like to move past this point in my life. I
21 mean, this has been going on for a long, long
22 time, and I would like to have some closure.
23 So I'm trying to get it back on track, back to
24 the mediation. I'm very familiar with it -- a
25 mediation. I do collateral duty.

1 investigations. I understand.

2 OIG SA GOSSARD: Uh-huh.

3 MS. GRIMES: So, I -- I have one agenda.

4 She has another agenda. There were several
5 times when we had heated exchanges. I know you
6 can appreciate that having -- you know, having
7 had some experience with me. We've had some
8 heated exchanges.

9 OIG SA GOSSARD: Well, I don't know if I
10 would term them like that, but --

11 MS. GRIMES: Well, you know what I mean.
12 I mean, they're -- they're a little -- it's a
13 little more of well, I want to make my point.
14 Well, I want to make my point. Well, I want to
15 make my point. Well, I want to make my point.

16 We had a lot of those over the evidence,
17 over discussions of the evidence.

18 OIG SA GOSSARD: Okay. Yeah, and I -- you
19 know, and I can understand that. What I can't
20 understand is, you know, Stokes going back for
21 whatever reason telling them there's tapes.
22 Menner saying okay, we need to listen to the
23 tapes. And Stokes testifying or saying in her
24 statement, she comes back and says will you let
25 them listen to the tapes? Listen. Okay? That

1 doesn't mean read, like read journal notes, or
2 read, you know, stuff you got -- wrote up about
3 phone conversations you had with the First
4 Assistant.

5 MS. GRIMES: Yeah.

6 OIG SA GOSSARD: Whatever. They're very
7 specific, and they're very adamant, okay, that
8 there's tapes, and it's listen. And for the
9 life of me I can't understand how you can sit
10 here today and all these other people are
11 confused, these four other people are confused
12 about tapes, and that wasn't cleared up during
13 the course over two days with this mediation.
14 And, you know, exact words like listen to
15 tapes. That's not read journal entries.
16 That's quite a big difference.

17 MS. GRIMES: No, you're -- you are -- you
18 are correct in that, but what I would say to
19 you is she did not come to me and say they want
20 to listen to your tapes.

21 OIG SA GOSSARD: Okay.

22 MS. GRIMES: She never came to me and said
23 that.

24 OIG SA GOSSARD: She never came --

25 MS. GRIMES: You know, they would like to

1 have access to your records. They would like
2 to see your evidence is the one that stands out
3 to me. I want to see your evidence. And you
4 know, that brings up a very odd email exchange
5 that I had with Ms. Canary later when I offered
6 to, you know, speak with her about my evidence.
7 And Ms. Canary emailed me back and said, I
8 would like to hear your evidence. And looking
9 back on that now, that should have been a red
10 flag to me.

11 OIG SA GOSSARD: Uh-huh.

12 MS. GRIMES: But I just thought she meant
13 hearing me. Hearing what I had to say.

14 OIG SA GOSSARD: Okay.

15 MS. GRIMES: You know, I can't say that I
16 didn't miss the boat. You know, I can't say
17 that there was not something that I did not
18 pick up, you know, in the conversations, but
19 there was nothing as overt as they want to
20 "listen" to your tapes. There was nothing as
21 overt as that. It was always about couching it
22 in terms of recordings, evidence.

23 OIG SA GOSSARD: I can't understand how
24 you couldn't have picked that up unless -- you
25 know, I just -- I can't understand that. You

1 know, because, again, going from their
2 perspective, alright, everybody's got this
3 perception of the AUSA in question, okay, and
4 it's from what I understand a good perception.
5 Again, that's neither here nor there for me to
6 judge that, but that's -- I'm just telling you
7 that's what I hear.

8 MS. GRIMES: Uh-huh.

9 OIG SA GOSSARD: Now all of a sudden, I
10 mean -- because I'm laying this for ground --
11 now all of a sudden they hear that there are
12 tapes, and according to them all, okay, if
13 there's tapes that changes everything, and
14 I'm --

15 MS. GRIMES: Uh-huh.

16 OIG SA GOSSARD: -- quoting people here.
17 That changes everything. If Ms. Grimes has
18 tapes with this person making disparaging,
19 inappropriate remarks, that changes everything.
20 And if those tapes exist and if it has those
21 remarks on it, then, yes, we are going to
22 settle. We would settle. We settle -- and
23 I'll quote again -- meritorious claims.

24 MS. GRIMES: Uh-huh.

25 OIG SA GOSSARD: Okay. So, that was all

1 their thought patterns. You know, you even got
2 Menner -- I got emails of him sending back to
3 his highers saying there may be tapes. Okay?

4 So, again, all these people are on this
5 same wavelength about tapes, but you're sitting
6 in there with Grimes coming in asking --
7 allegedly, you know, according to her
8 statements -- asking you about tapes, and over
9 a two-day period, and as you sit here today,
10 you didn't know a thing about tapes.

11 MS. GRIMES: Well, see in hindsight today
12 I know about tapes.

13 OIG SA GOSSARD: Well --

14 MS. GRIMES: Because, you know --

15 OIG SA GOSSARD: Yeah, I'm sure --

16 MS. GRIMES: -- I have knowledge.

17 OIG SA GOSSARD: You say in December.

18 MS. GRIMES: Yeah.

19 OIG SA GOSSARD: Again, with all the red
20 flags that it raised with these folks about
21 tapes and what that means, and that now, okay,
22 maybe we were wrong here, if there's tapes and
23 this guy made these remarks, we're going to
24 settle. Let's listen to the tapes, okay.

25 Again, that's going back and forth several

1 times. You know, Stokes is running back and
2 forth like a -- like a diplomat, like somebody
3 between two countries, you know, trying to come
4 to a settlement.

5 MS. GRIMES: Well, let's be clear. She
6 was acting as an advocate. She was an advocate
7 for management, and she was running back and
8 forth. She was running back and forth. But as
9 you're -- as you're speaking to me right now
10 I -- I am remembering one thing that she asked
11 me about witnesses, and she did in fact ask me
12 about witnesses. She said -- I don't even know
13 when or -- or what, but she said who is going
14 to support what you are going to say? And I
15 remember replying to her in something like
16 everybody's not going to lie. You know, there
17 are people who will do the right thing and will
18 stand up, and will say, yes, he treated her
19 that way, yes, he did that to her, you know,
20 yes, he called her these names. You know,
21 there are people. I cannot believe that you're
22 going to have 12 AUSA's and agents out there
23 who are -- who are not going to be truthful
24 about it. And that is in -- in context what I
25 said to her.

1 I mean, those are not exact words. That's
2 a paraphrase about it. So, that whole thing
3 about I won't need any witnesses, I mean, I
4 can't even imagine where that could come from.
5 I -- I speak with you --

6 OIG SA GOSSARD: Well, I could tell you
7 where I could see where you're coming from.
8 Again, if you made a comment that you had
9 tapes, I could see you making that comment. I
10 would make that comment. If I had a similar
11 situation, and I had recorded somebody.

12 MS. GRIMES: Uh-huh.

13 OIG SA GOSSARD: You better believe I
14 would tell the mediator, hey, I got tapes, you
15 won't need to talk to any witnesses. You know,
16 again, this is absolute proof. So I could see
17 where it would come from, okay, if it fits
18 here.

19 MS. GRIMES: Yeah.

20 OIG SA GOSSARD: And again, what I'm
21 saying is, you got three management officials
22 and a mediator all saying there were
23 discussions going back and forth over two days
24 about tapes.

25 MS. GRIMES: Uh-huh.

1 OIG SA GOSSARD: But for whatever
2 reason --

3 MS. GRIMES: I'm not privy to that,
4 though.

5 OIG SA GOSSARD: -- Ms. -- Ms. Grimes is
6 in this same mediation and they're coming in
7 and Stokes is telling you things, and it's just
8 right over your head?

9 MS. GRIMES: No. Now, see, that's --
10 that's not exactly true. You're not describing
11 it the way that it was. I am one person in one
12 room.

13 OIG SA GOSSARD: Uh-huh.

14 MS. GRIMES: All of the other people are
15 in another room. Ms. Stokes is coming to me
16 and asking me a question or two, and then she
17 will go and she will stay 45 minutes or so with
18 them.

19 OIG SA GOSSARD: Uh-huh.

20 MS. GRIMES: And then she'll come back,
21 and she'll ask me a question or two, and then
22 she'll go in there, and she'll -- she'll speak
23 with them for an extended period of time, and
24 they'll discuss whatever they're going to
25 discuss. And she'll come back to me. Every

1 time my agenda is different. I mean, I am
2 focusing on what I am hoping to accomplish in
3 this mediation.

4 OIG SA GOSSARD: Uh-huh.

5 MS. GRIMES: I am not thinking of video
6 tapes, audiotapes. I'm not privy to what --
7 what they're talking about. My mind frame is
8 let us, you know, talk about how we can resolve
9 this. My mind frame is not, you know, oh, my
10 god, she's got tapes. That never crossed my
11 mind that -- that that would be what they were
12 discussing. I was thinking that they wanted to
13 carry it over for another day because they
14 wanted to consider settling with me. I mean,
15 nobody came to me and said, you know, this is
16 what we're thinking. This is what we're doing.
17 Nobody ever did that. I mean, it was -- I had
18 the least amount of communication. She spent
19 very little time with me.

20 OIG SA GOSSARD: Uh-huh.

21 MS. GRIMES: She spent most of her time
22 with them, and they were discussing whatever
23 they were discussing. I was not privy to that.

24 OIG SA GOSSARD: So -- so then from what
25 you just told me it would strike you as being

1 very odd that all four of them stated in their
2 interviews that the reason it went over a
3 second day was to give you time to confer with
4 your attorney about turning over tapes?

5 MS. GRIMES: Yes, that would surprise me
6 very much. And as I said, the discussion about
7 whether my attorney would allow me to -- to
8 provide any evidence did come up. It did come
9 up, absolutely. We talked about that, but it
10 was in the context of just my recordings, my --
11 my writings, my -- my journals. It was not in
12 the context of what they were thinking. So
13 they were thinking one thing. I'm thinking
14 another thing. And they didn't tell me why
15 they were going to extend it another day. They
16 just asked me if I would be amenable to do it.
17 And I said, yes, I would. I would absolutely,
18 because I'm thinking that they're going to
19 consider, you know, a settlement offer. And we
20 get there the next day and, I mean, it's
21 basically -- it's basically nothing, because
22 when I did talk to my attorney what he said is
23 this, this is not discovery, have they made you
24 an offer? Well, no. Well, you know, don't
25 call me asking for discovery, because this is

1 not discovery. This is a mediation. This is
2 about an offer. If you want to call me and
3 tell me that they made an offer, then you call
4 me and tell me that. And so I mean I got that
5 message. I understand.

6 OIG SA GOSSARD: Okay. Speaking of your
7 attorney, did Ms. Stokes ask you the name of
8 your attorney?

9 MS. GRIMES: He did. She did, I'm sorry.

10 OIG SA GOSSARD: She did?

11 MS. GRIMES: Yes, she did, uh-huh.

12 OIG SA GOSSARD: And did you provide that
13 to her?

14 MS. GRIMES: No, I did not.

15 OIG SA GOSSARD: Okay. And why is that?

16 MS. GRIMES: Because I was not represented
17 at the mediation.

18 OIG SA GOSSARD: Okay. What's the
19 attorney's name?

20 MS. GRIMES: Scott Boudreaux.

21 OIG SA GOSSARD: What is it?

22 MS. GRIMES: Scott Boudreaux.

23 OIG SA GOSSARD: How do you spell that
24 last name?

25 MS. GRIMES: B-o-u-d-r-e-a --

1 OIG SA GOSSARD: -- b-a?

2 MS. GRIMES: -- e-a.

3 OIG SA GOSSARD: -- e-a?

4 MS. GRIMES: -- u-x. Scott Boudreaux.

5 OIG SA GOSSARD: And he's out of

6 Birmingham?

7 MS. GRIMES: Yes.

8 OIG SA GOSSARD: Do you know his phone

9 number off the top of your head?

10 MS. GRIMES: No, I don't.

11 OIG SA GOSSARD: Alright. Did -- did

12 Ms. Stokes ask you to discuss the specifics of

13 what was on the tapes? Again, I'm talking

14 tapes.

15 MS. GRIMES: No.

16 OIG SA GOSSARD: Not your evidence in

17 general, but tapes?

18 MS. GRIMES: No.

19 OIG SA GOSSARD: Did she ever ask you hey,

20 what -- what exactly is on these tapes?

21 MS. GRIMES: No. The only time I ever --

22 as I told you before, the only time I ever had

23 a kind of a confused moment when she was

24 talking to me is when she would say well, then

25 like you would record like what? And -- and I

1 quoted her an exact statement from my EEO
2 complaint, an exact statement, I said well, I
3 would record like, you know, he said Tammy, get
4 over there and clean off the table, or
5 something like that. And I remember at that
6 time when I answered that question, I thought
7 that's a strange -- that's a strange question.

8 OIG SA GOSSARD: Okay. So she didn't ask
9 you to discuss the specifics of what was on the
10 tapes?

11 MS. GRIMES: No.

12 OIG SA GOSSARD: Okay.

13 MS. GRIMES: No.

14 OIG SA GOSSARD: So then I --

15 MS. GRIMES: She asked me -- and I want to
16 be clear about this, because I'm not sure we're
17 communicating.

18 OIG SA GOSSARD: Oh, we're --

19 MS. GRIMES: She asked me --

20 OIG SA GOSSARD: -- communicating.

21 MS. GRIMES: She asked me the types of
22 things that I would record.

23 OIG SA GOSSARD: Uh-huh.

24 MS. GRIMES: You know, and I'm thinking,
25 okay, record. She's obviously thinking record

1 in a different context.

2 OIG SA GOSSARD: Okay. Did you refuse to
3 tell her what was on the tapes?

4 MS. GRIMES: No, I just told you, I told
5 her what I had recorded.

6 OIG SA GOSSARD: Uh-huh.

7 MS. GRIMES: Now, there was no discussion
8 of tapes. You keep bringing up tapes, there
9 was no discussion of tapes.

10 OIG SA GOSSARD: Well, that's what this
11 is -- this is -- that's what this is all
12 about --

13 MS. GRIMES: Okay.

14 OIG SA GOSSARD: -- Ms. Grimes.

15 MS. GRIMES: There was -- let me be clear
16 then.

17 OIG SA GOSSARD: So I'm going to be
18 bringing up tapes.

19 MS. GRIMES: Okay. There was never, ever
20 any discussion of me making tapes of AUSA -- I
21 guess it's AUSA Feaga --

22 OIG SA GOSSARD: Or anybody.

23 MS. GRIMES: -- making disparaging
24 remarks? There was never any discussion of
25 that.. There were discussions of recordings.

1 In my context being recordings, written
2 recordings.

3 OIG SA GOSSARD: Did you contact Stokes
4 later that evening at her hotel, I believe the
5 Embassy Suites in Montgomery, and inform her
6 that your attorney was upset with you for
7 disclosing that you had tapes?

8 MS. GRIMES: I called her -- I do believe
9 that I did call her that night, and I do
10 believe I told her that he was upset with me
11 for discussing discovery, because this was a
12 mediation and we should be discussing
13 settlement and settlement offers, and they had
14 not made an offer so why were we discussing
15 discovery.

16 OIG SA GOSSARD: So you did tell Stokes
17 that your attorney had told you that mediation
18 was not about discovery, but about resolution,
19 or words to that effect? So that is in fact
20 true?

21 MS. GRIMES: Yes. Or words to that
22 effect. I mean, that's not, you know.

23 OIG SA GOSSARD: Did you tell Stokes at
24 that time during that phone conversation that
25 you were not going to turn over the tapes

1 because that wouldn't further the EEO mediation
2 process?

3 MS. GRIMES: No. We never discussed any
4 tapes. We came to the point where she asked me
5 to turn over my evidence, and I declined to do
6 that.

7 OIG SA GOSSARD: Is it possible that you
8 did in fact make tapes but they're not
9 incriminating, as you had stated during the
10 mediation process, and that's why you're not
11 turning them over?

12 MS. GRIMES: I never made tapes. Not ever
13 at any time did I make tapes.

14 OIG SA GOSSARD: I'll just make a few
15 more. I think this has already been asked, but
16 just to make sure I'll ask again. So Stokes
17 never came in to you and asked you if the other
18 parties could listen to the tapes?

19 MS. GRIMES: No, she did not. And again I
20 want to clarify, she asked me many, many, many
21 times if they could view my evidence, if they
22 could see my evidence, if -- if I would give
23 her a list of witnesses, or -- she didn't use
24 the term "witnesses", what I was going to use
25 to substantiate my claim, or something in -- in

1 those words. I cannot tell you --

2 OIG SA GOSSARD: Uh-huh.

3 MS. GRIMES: -- word for word what she --
4 what she said. But, you know, there were many,
5 many times that she asked me for -- for various
6 evidence, you know. Well, just, you know, a
7 show of good faith, you know, show me some of
8 your evidence, and I did not.

9 OIG SA GOSSARD: And again I keep going
10 back to this same point, though, you got four
11 individuals that all are locked around tapes.

12 MS. GRIMES: Uh-huh.

13 OIG SA GOSSARD: And you got Stokes going
14 back and forth mediating between the two
15 parties, and not once over this two-day period
16 did this get rectified.

17 MS. GRIMES: Well, you've got to
18 understand --

19 OIG SA GOSSARD: I don't know what there
20 is to understand. The only thing -- what
21 you're telling me is that these four people,
22 Stokes and the other three, are basically
23 conspiring against you, is the only thing I can
24 figure out.

25 MS. GRIMES: Well, those are your words,

1 not my words.

2 OIG SA GOSSARD: Well, how would you --
3 tell me what -- what your theory is.

4 MS. GRIMES: Well --

5 OIG SA GOSSARD: Tell me why we got the
6 U.S. Attorney for this District, the First
7 Assistant, an AUSA out of General Counsel's
8 Office, and a mediator who, you know, believe
9 me -- you may not believe me, but really, you
10 know, does understand her position in all this,
11 and wants to remain neutral, per her charter,
12 you know, all say tapes were discussed.

13 Now, you tell me why these four folks are
14 telling, you know, an OIG investigator that
15 there was tapes. And again going back to the
16 conversations, the back and forth, to me if
17 they're telling the truth, there should be no
18 reason, no way why Tamara Grimes shouldn't have
19 picked up on that during the two days of this
20 mediation and said, whoa, wait a minute, time
21 out, what are you talking about tapes, I'm
22 talking about a journal here.

23 So I want to hear your theory on, you
24 know, how this -- how this is happening, and
25 how I got four individuals telling me a

1 different story from yours.

2 MS. GRIMES: Well, first I would like to
3 point out you say you have four individuals,
4 okay? I had one individual. That would be
5 myself and Ms. Stokes. We communicated with
6 each other. I do not know the basis or the
7 contents or the context of the conversations
8 between Ms. Stokes and management. I know and
9 I clearly documented after the mediation to the
10 EEO staff that Ms. Stokes did not in fact
11 function as a neutral party, but she functioned
12 as an advocate. She was in full AUSA mode.
13 That is my exact term for what she was doing.
14 She was trying to push me into doing something
15 that I did not want to do.

16 Now, you keep raising the term "tapes". I
17 knew nothing about tapes that day. I knew
18 nothing about tapes until you called me on
19 December 17th. You're asking me today to
20 explain something that I did not know at that
21 time. You're asking me to guess what these
22 people may have been saying and doing. I -- I
23 have no way of knowing that. The only thing
24 that I can tell you is what my intentions were,
25 what my agenda was on that day. And I think

1 that I've fairly articulated that, but if I
2 haven't I would be glad to say I went into the
3 mediation in a good faith effort to try to
4 resolve our differences. I was not willing to
5 turn it into discovery because it's not about
6 discovery. It's not as if they did not have
7 information. They had plenty of information.
8 They had been -- they had been interviewing
9 witnesses all that day. They had a very
10 detailed complaint from me, a claim from me,
11 and it's not like it was -- it was very
12 general. It was very, very specific, on this
13 day this happened, on this day this happened.
14 You know, I've been harmed by this in this
15 manner. These are the damages that I've
16 incurred, and this is what I would like to see
17 come out of this. That's my mindset when I
18 went in that day. I'm not thinking about
19 what -- what might be interpreted about what
20 I'm saying as I'm trying to honestly
21 communicate. I -- I have no way of knowing --

22 OIG SA GOSSARD: Okay. Let's --

23 MS. GRIMES: -- what's going on behind
24 closed doors.

25 OIG SA GOSSARD: Alright. -- Let's -- let's

1 cut out the -- the management. Let's just talk
2 about your interactions between you and Stokes.

3 MS. GRIMES: Yes.

4 OIG SA GOSSARD: Since you have direct
5 knowledge of that.

6 MS. GRIMES: Yes.

7 OIG SA GOSSARD: What you said to her, and
8 what she said to you.

9 MS. GRIMES: Yes.

10 OIG SA GOSSARD: Okay. So if Stokes is
11 telling me that you told her there were tapes.

12 MS. GRIMES: Uh-huh.

13 OIG SA GOSSARD: And that, you know, she's
14 going back and she's relaying to you that they
15 want to listen to the tapes. Stokes is telling
16 me that in an interview.

17 MS. GRIMES: Uh-huh.

18 OIG SA GOSSARD: Are you telling me Stokes
19 is lying to me?

20 MS. GRIMES: No, I would not. I would say
21 that maybe she misunderstood, or there's some
22 misperception or miscommunication. I would not
23 accuse her of lying. No, I would not.

24 OIG SA GOSSARD: Even though she says
25 with, you know, 100% certainty there's no doubt

1 in her mind that there were tapes, that you
2 mentioned tapes, that you had audiotapes, and
3 she says there's no miscommunication, there's
4 no misconception.

5 MS. GRIMES: Well, I say that there --
6 that there was no discussion of tapes. I
7 can't, you know, I can't address what -- what
8 her perception was. I mean, her perception's
9 going to be based on her experiences and her
10 education, and her status as an AUSA. I'm not
11 an AUSA, I'm just a paralegal. And where she
12 might be thinking of one thing, I'm thinking of
13 another, and I -- I cannot -- I'm not accusing
14 her of lying, and -- and I understand that if
15 she has a position that she truly believes in
16 that she's defending that position. I'm just
17 saying that that is not what happened. We did
18 not discuss tapes. We discussed recordings.
19 We discussed evidence.

20 OIG SA GOSSARD: Okay. Did you take notes
21 that day?

22 MS. GRIMES: Yes, I did take notes that
23 day.

24 OIG SA GOSSARD: You took notes? Are
25 you -- and you're probably aware that

1 Ms. Stokes took notes also?

2 MS. GRIMES: Yes.

3 OIG SA GOSSARD: Okay. And what would you
4 say to the fact that I have Ms. Stokes's notes
5 from that day, and in those notes there's
6 reference to tapes?

7 MS. GRIMES: Uh-huh.

8 OIG SA GOSSARD: What would you say?

9 MS. GRIMES: I -- again, I could not -- I
10 cannot address her thought processes, because
11 she did not share those with me.

12 OIG SA GOSSARD: Okay. So you have no
13 comment, or you can't, you know -- I just
14 got -- I've also got Ms. Watson's notes from
15 that day where she has in there attorney has
16 tapes. Again, I know that was -- you had no
17 direct conversations with her, but, again,
18 going back to Stokes, you know, I have her
19 notes, contemporaneous to her conversations
20 with you, and she has in there "tapes". She
21 doesn't have "journal." She doesn't have, you
22 know, "written recording," conversations
23 between yourself and the First Assistant. She
24 has "tapes" in her notes.

25 No idea whatsoever?

1 MS. GRIMES: Listen, I have no -- I do not
2 have privy to her notes. I have no knowledge
3 at all of her notes. I don't know what she
4 wrote in her notes. I don't know what her
5 perceptions were. She did not share those with
6 me. So, I have no personal knowledge of that.

7 OIG SA GOSSARD: Did you bring up that you
8 had tapes during this mediation as a bluff to
9 bolster your EEO case?

10 MS. GRIMES: No, I did not.

11 OIG SA GOSSARD: So you did not bring up
12 the existence of tapes as a bluff?

13 MS. GRIMES: No, I did not.

14 OIG SA GOSSARD: Okay.

15 MS. GRIMES: Why would I do that?

16 OIG SA GOSSARD: People bluff all the
17 time, Ms. Grimes, during negotiations. I think
18 you're well aware. You've been around long
19 enough to -- to know that. You know, happens
20 all the time.

21 MS. GRIMES: Well, I'm -- I'm not
22 necessarily going to say that I -- that I have.
23 I didn't. I do civil. I don't do criminal.

24 OIG SA GOSSARD: Uh-huh. Okay. I'd just
25 like to recap. First off, as far as recordings

1 go, it's your statement here today that you
2 never recorded any person in the U.S.
3 Attorney's Office in any manner as far as audio
4 recordings, tape-recordings, digital
5 recordings?

6 MS. GRIMES: Never at any time whatsoever.

7 OIG SA GOSSARD: Okay. And that includes
8 like perhaps leaving a recorder in a room, an
9 empty room where you weren't present? You may
10 have staged a recorder there, then walked out,
11 and people were having a meeting. You never
12 did that?

13 MS. GRIMES: Never at any time whatsoever.

14 OIG SA GOSSARD: Okay. And it's also your
15 statement here today that during this mediation
16 with Ms. Stokes primarily, that the word tapes,
17 audio recordings, so on so forth, never came up
18 one instance --

19 MS. GRIMES: I have -- no.

20 OIG SA GOSSARD: -- during the two-day
21 mediation process?

22 MS. GRIMES: No, I have no recollection of
23 that at all. That would have been something
24 that I -- that would have caught my attention.

25 OIG SA GOSSARD: Okay. And everything you

1 said here today is the truth?

2 MS. GRIMES: Yes, it is.

3 OIG SA GOSSARD: Okay. Will you be
4 willing to submit to a polygraph examination to
5 cover the things you said here today?

6 MS. GRIMES: No, I would not.

7 OIG SA GOSSARD: You would not?

8 MS. GRIMES: No, I would not.

9 OIG SA GOSSARD: And why is that?

10 MS. GRIMES: Because DOJ policy does not
11 require its employees to submit to polygraph.

12 OIG SA GOSSARD: I know it doesn't require
13 it, but I think it would certainly be helpful.

14 MS. GRIMES: Well, you see, I know that
15 I'm telling the truth, and I know that a
16 polygraph is an interpretive exam.

17 You know, your investigation is going to
18 be what it is, because this is what it is.
19 And, you know, ultimately I have no control
20 over that, but, no, I would decline to
21 participate in a polygraph.

22 OIG SA GOSSARD: Okay. Phil, you got any
23 questions?

24 OIG SA VAN NIMWEGEN: Yeah, I just -- I
25 just want to be perfectly clear that when Agent

1 Gossard referred to tapes, he's referring to
2 any type of audio recordings --

3 MS. GRIMES: Yes.

4 OIG SA VAN NIMWEGEN: -- digital. And you
5 made a statement -- what was the purpose of
6 your mediation, you were -- the second day you
7 thought maybe you were going to get some type
8 of -- they were going to offer you a --

9 MS. GRIMES: I thought maybe they were
10 considering settlement.

11 OIG SA VAN NIMWEGEN: Okay. Now, you
12 stated that you had some type of recordings,
13 whether -- you said written recordings --

14 MS. GRIMES: Written.

15 OIG SA VAN NIMWEGEN: -- is what you're
16 referring to.

17 MS. GRIMES: Yes.

18 OIG SA VAN NIMWEGEN: And if that is
19 evidence, you refer to that as evidence,
20 right --

21 MS. GRIMES: Yes.

22 OIG SA VAN NIMWEGEN: -- towards your
23 case?

24 MS. GRIMES: Yes.

25 OIG SA VAN NIMWEGEN: Okay. And if you

1 wanted some type of settlement, why wouldn't
2 you bring those with you?

3 MS. GRIMES: Because I had already
4 summarized them in the complaint -- in the
5 complaint.

6 OIG SA VAN NIMWEGEN: Yeah, but still why
7 wouldn't you bring them with you though?

8 MS. GRIMES: See, Ms. -- Ms. Watson and
9 Ms. Goss, they both knew. I mean, they knew
10 that. I had --

11 OIG SA VAN NIMWEGEN: Yeah, but I -- I
12 understand that, but --

13 MS. GRIMES: -- contacted them many times.

14 OIG SA VAN NIMWEGEN: -- your whole
15 interpretation of that mediation was to get
16 some type of settlement.

17 MS. GRIMES: Yes.

18 OIG SA VAN NIMWEGEN: Okay. So you would
19 bring -- at least I know I would -- bring the
20 strongest case I could possibly provide. Why
21 didn't you bring your attorney?

22 MS. GRIMES: Money. Very simply, money.
23 It was a money issue. It was a money call.

24 OIG SA VAN NIMWEGEN: Yeah, but you're
25 expecting some type of settlement, and --

1 MS. GRIMES: I'm not expecting. I'm
2 hoping that it can be resolved early.

3 OIG SA VAN NIMWEGEN: Yeah.

4 MS. GRIMES: Without having to go through
5 all of the steps that you have to go through.

6 OIG SA VAN NIMWEGEN: But did he have then
7 your journal? Did you provide your journal to
8 the attorney?

9 MS. GRIMES: He had a copy of it.

10 OIG SA VAN NIMWEGEN: Okay.

11 OIG SA GOSSARD: Well, if he had a copy of
12 it, then why would you -- well, I guess you
13 would still need to discuss it with him whether
14 you wanted to turn that over or not?

15 MS. GRIMES: Yes.

16 OIG SA VAN NIMWEGEN: So he -- your
17 discussions with him on the phone doesn't cost
18 you any money, but him showing up to the
19 mediation would cost you money, right?

20 MS. GRIMES: Yes.

21 OIG SA VAN NIMWEGEN: Alright. I -- it's
22 just kind of confusing. If I'm expecting a
23 settlement --

24 MS. GRIMES: It's the nature of mediation.

25 It's the purpose of mediation.

1 OIG SA VAN NIMWEGEN: Right. But you want
2 to present your best case forward.

3 MS. GRIMES: And I did, through my
4 complaint.

5 OIG SA VAN NIMWEGEN: And there's no way
6 that you mentioned by accident having some type
7 of audio recordings?

8 MS. GRIMES: No. Recordings, yes.

9 OIG SA VAN NIMWEGEN: Conversation
10 recordings. I mean --

11 MS. GRIMES: Conversation recordings, yes.

12 OIG SA VAN NIMWEGEN: But I --

13 MS. GRIMES: I mean, like --

14 OIG SA VAN NIMWEGEN: I find it hard to
15 believe, and like Scott does, I -- I find it
16 hard to believe that you refer to stuff you're
17 writing down as recordings. I think --

18 MS. GRIMES: Well, she started that. I
19 didn't start that. You know, it's -- it's
20 not --

21 OIG SA VAN NIMWEGEN: She was the first
22 one to come out and say "recordings"?

23 MS. GRIMES: She was the first one to come
24 out and say "recordings". And so when she --

25 OIG SA VAN NIMWEGEN: Why would she come

1 out --

2 MS. GRIMES: -- said "recordings", I said
3 "recordings".

4 OIG SA VAN NIMWEGEN: Oh, she said do you
5 have any recordings, and you said yes --

6 MS. GRIMES: Yes.

7 OIG SA VAN NIMWEGEN: -- type of thing?

8 MS. GRIMES: Yes.

9 OIG SA VAN NIMWEGEN: Well, what would
10 make her ask you if you had recordings? Her
11 assumption is that you had some type of audio
12 recordings. What would strive her to say, do
13 you have recordings?

14 MS. GRIMES: I don't know.

15 OIG SA VAN NIMWEGEN: Did you say
16 something to effect of conversations, or --

17 MS. GRIMES: Well, we were talking about
18 keeping, you know, keeping -- it all started
19 out with records, when we first started talking
20 about the records. Okay, let's talk about the
21 records. So I would tell her, you know, yes, I
22 have records, I -- I'm a very meticulous record
23 keeper. You know, I keep records. And she
24 said like well, what would you record? And so
25 I said well, I would record, you know, this,

1 and I would record that. And then the -- the
2 confusing question came -- she goes and she
3 talks to management, and she comes back and
4 she's asking me another thing, and she said
5 well, what's an example of something you would
6 record? And I said -- I pulled something
7 straight from the complaint and said well, I
8 would record like dah, dah, dah.

9 OIG SA VAN NIMWEGEN: Uh-huh.

10 MS. GRIMES: And in hindsight I know that
11 I was talking about one thing, and she was
12 talking about another. But Special Agent
13 Gossard keeps going back to the four of them,
14 the four of them, the four of them. I -- you
15 know, I didn't know what they were talking
16 about.

17 OIG SA VAN NIMWEGEN: But I guess what
18 Ms. Stokes's statement was is she came back to
19 you and said they want to listen to your
20 recordings. And you didn't hear her say
21 "listen"?

22 MS. GRIMES: No, I -- I understood her to
23 say they want to view your evidence, they want
24 to see your evidence. They want to see the
25 evidence. You know, hear was not -- the only

1 time I ever heard hear was, like I said, when
2 Ms. Canary sent me an email one time and said I
3 would like to hear your evidence. And that
4 didn't really mean anything to me at the time,
5 because I had not spoken with Special Agent
6 Gossard yet, but it is -- a mediation is a
7 pre --

8 OIG SA VAN NIMWEGEN: No, I understand
9 what mediations are.

10 MS. GRIMES: Okay.

11 OIG SA VAN NIMWEGEN: But, I mean,
12 everybody goes into a mediation with --

13 MS. GRIMES: Yeah.

14 OIG SA VAN NIMWEGEN: -- the same idea
15 that maybe I can get a settlement out of this.

16 MS. GRIMES: Yeah.

17 OIG SA VAN NIMWEGEN: So I know if I did
18 I'm bringing my evidence with me so in case
19 they ask me can I review it. Of course, this
20 is all true and complete, please review it, and
21 if I can get a settlement today, by all means
22 let's do it.

23 MS. GRIMES: Well, obviously --

24 OIG SA VAN NIMWEGEN: Especially since you
25 didn't bring an attorney, and you'd like to fix

1 that right away so you don't have to bring your
2 attorney into it, I'd --

3 MS. GRIMES: But I didn't bring an
4 attorney, but I did do a 27-page position
5 statement beforehand.

6 OIG SA VAN NIMWEGEN: But a lot of people
7 write those. I mean, anybody can write, and it
8 could be, you know, we got fishing and
9 non-fishing stuff.

10 MS. GRIMES: Uh-huh.

11 OIG SA VAN NIMWEGEN: But your evidence
12 can --

13 MS. GRIMES: Yeah.

14 OIG SA VAN NIMWEGEN: -- help you show
15 that this is true and complete, and actually I
16 do have a witness here, please talk to this
17 witness, they were there at this time, which is
18 noted in my journal.

19 MS. GRIMES: Uh-huh.

20 OIG SA VAN NIMWEGEN: And then that's
21 really strong. See what I'm saying? That's
22 what I don't understand.

23 MS. GRIMES: Well, I didn't take an
24 attorney. You know, I didn't take an attorney,
25 and it was strictly --

1 OIG SA VAN NIMWEGEN: Or your evidence.

2 MS. GRIMES: It was strictly a business
3 decision, because I had very -- I specifically
4 set it out in two things. First the EEO
5 complaint.

6 OIG SA VAN NIMWEGEN: Uh-huh.

7 MS. GRIMES: And second in the very
8 detailed position statement that my attorney
9 read and revised and, you know, said sounds
10 good to me.

11 OIG SA GOSSARD: You're talking Boudreaux?

12 MS. GRIMES: Yeah.

13 OIG SA GOSSARD: Okay.

14 MS. GRIMES: And said, you know, sounds
15 good to me.

16 OIG SA VAN NIMWEGEN: Okay.

17 MS. GRIMES: So, I mean, I --

18 OIG SA GOSSARD: Is he the only attorney
19 you had for --

20 MS. GRIMES: Yes.

21 OIG SA GOSSARD: -- whatever reason during
22 this whole process?

23 MS. GRIMES: Yes.

24 OIG SA GOSSARD: And would you have any
25 problem emailing me his contact information?

1 MS. GRIMES: If I have it somewhere.

2 OIG SA GOSSARD: Again, I just -- I got to
3 tell you, Ms. Grimes, I just have a hard time
4 sitting here today listening to what you told
5 us in light of what the other witnesses have
6 told us, particularly --

7 MS. GRIMES: There's only one witness.

8 OIG SA GOSSARD: Particularly Ms. Stokes.

9 MS. GRIMES: She's the only one witness.

10 OIG SA GOSSARD: Okay. Particularly her,
11 and her being, you know, adamant that there's
12 no confusion. You know, she even brought up,
13 you know, I -- you know, I specifically asked
14 her during the interview, is there any -- or
15 any way Ms. Grimes can, you know, try to muddy
16 this up, confuse this, you know, say there was
17 a miscommunication, and she told me. I knew
18 coming in today what, you know, what you were
19 going to say. She told me.

20 MS. GRIMES: Well, that's comforting to
21 know.

22 OIG SA GOSSARD: The only thing that she
23 possibly could say was she also told me there
24 was written -- a journal kept, and that I was
25 confusing that, but that's not the case.

1 MS. GRIMES: So you're telling me that you
2 came in here with a preconceived notion.

3 OIG SA GOSSARD: No, I didn't come in with
4 a preconceived notion. I came in here, you
5 know, like I always do as a investigator trying
6 to think of possible scenarios that the person
7 I'm going to interview is going to tell me,
8 okay. And it's not preconceived. That's just,
9 you know, paralegals got ways of doing things.
10 Investigators got ways of doing things, and I
11 wouldn't be doing my job if I didn't come in
12 here with a game plan, you know, trying to
13 think ahead of the person that I'm going to be
14 interviewing and what possibly they could say,
15 you know, so that I could be prepared.

16 MS. GRIMES: But you just told me that
17 you --

18 OIG SA GOSSARD: That's --

19 MS. GRIMES: -- asked the other witness
20 well, what could she say? What could she say?
21 That suggests to me that you have an agenda
22 to -- to charge me with something.

23 OIG SA GOSSARD: No. I have an agenda to
24 find the truth. Okay? That's my agenda.

25 MS. GRIMES: Yes.

1 OIG SA GOSSARD: Okay. And --

2 MS. GRIMES: If you don't like my version
3 of the truth, that doesn't make it a lie.

4 OIG SA GOSSARD: No, it don't, but, again,
5 you know, I got to look at the totality of --

6 MS. GRIMES: I know, but what you're
7 telling me --

8 OIG SA GOSSARD: -- of the evidence here.

9 MS. GRIMES: But what I hear you saying to
10 me right now is well, I have this AUSA, and,
11 you know, she's very believable, and she just
12 insists this, that this is how it is, and then
13 I have you, and, you know, we've already
14 discussed what you were going to say.

15 OIG SA GOSSARD: And --

16 MS. GRIMES: I know what you were going to
17 say.

18 OIG SA GOSSARD: And I got this going back
19 and forth, and, you know, almost not quotes,
20 but this is what I asked her. I went to these
21 guys, and they said they want to listen to the
22 tapes. So I go back to Grimes, and I said hey
23 they want to listen to the tapes.

24 Now, to me that's pretty clear. Listen to
25 the tapes. That's not see your evidence, look

1 at your journal. Okay? That's listen to the
2 tapes. So I can't see as I'm sitting here
3 today how that could be confusing.

4 MS. GRIMES: It's not confusing to me.

5 OIG SA GOSSARD: You know, again, we'll
6 take the three out of the picture because you
7 didn't have direct contact with them.

8 MS. GRIMES: Yeah.

9 OIG SA GOSSARD: But looking at what
10 Stokes told me, you know, and her interaction
11 between the management and you, her relaying
12 these requests, these questions, okay, it's
13 pretty specific. And -- and she told me that
14 in her mind there's no doubt that this is
15 tapes. Her notes --

16 MS. GRIMES: You said it right there.

17 OIG SA GOSSARD: Her notes confirm.

18 MS. GRIMES: You said it right there. In
19 her mind.

20 OIG SA GOSSARD: Yeah.

21 MS. GRIMES: In her mind --

22 OIG SA GOSSARD: Okay.

23 MS. GRIMES: -- they were tapes. Okay.

24 And that is -- that is the whole ball of wax
25 right there. In her mind they were tapes.

1 There were no tapes. I have never, ever, ever
2 taped anybody at all at any time whatsoever.

3 OIG SA GOSSARD: And never --

4 MS. GRIMES: In her mind.

5 OIG SA GOSSARD: And never ever told

6 Stokes that?

7 MS. GRIMES: Never ever told Stokes that.

8 We talked about recordings extensively.

9 Extensively about recordings. And -- and how
10 would you have recorded this, and how would you
11 have recorded that? Well, where would he have
12 been when he said that? You know, I mean, we
13 talked extensively about these things, but you
14 just hit on the nexus right there, in her mind
15 it became something else. She made notes about
16 it. I don't know about her notes. I don't
17 know what's going on in her mind. I don't know
18 what she goes and talks to these people about.
19 I don't know that they have all of this going
20 on behind the scenes. That's not even my
21 agenda, you know. And you sit here today and
22 you tell me in so many words that you believe
23 her over me, for whatever reason. Well, maybe
24 it's because I don't want to take a polygraph,
25 but I am telling you that what I have told you

1 today is the truth, the whole truth, and
2 nothing but the truth. There were never any
3 audiotapes discussed in anything but
4 Ms. Stokes' mind and among those people who had
5 no part of this. Between the two of us it was
6 discussions of recordings.

7 OIG SA GOSSARD: Uh-huh.

8 MS. GRIMES: Evidence, discovery. This is
9 not discovery, this is mediation. Well, have
10 they given an offer? No, they're not going to
11 give you an offer. The U.S. Attorney doesn't
12 believe you. Ms. Stokes said I don't believe
13 you. Okay.

14 If you have a neutral mediator, does a
15 neutral mediator come in and say I don't
16 believe you? So, Ms. Stokes does in fact have
17 a dog in this fight. I mean, she has to in
18 some way explain why she was acting as an
19 advocate for management rather than as a
20 neutral party trying to make resolution. We
21 all had our reasons to go there. My reason to
22 go there was to try to resolve it early without
23 having to go through the whole process, and
24 everybody does their discovery, and everybody
25 gets interviewed, and they come in here and --

1 you know, that was my agenda.

2 OIG SA GOSSARD: And see maybe it would be
3 more believable to me if this was just like a
4 one incident thing. But, again, it's back and
5 forth.

6 MS. GRIMES: It's back and forth.

7 OIG SA GOSSARD: It's over two days.
8 It's --

9 MS. GRIMES: Well, now, the second day --

10 OIG SA GOSSARD: It's half day okay.

11 MS. GRIMES: The second day there was --
12 there was --

13 OIG SA GOSSARD: Okay.

14 MS. GRIMES: -- very little discussion at
15 all.

16 OIG SA GOSSARD: It's a call to the hotel.
17 Okay? It's a call to the hotel to Stokes
18 where --

19 MS. GRIMES: Uh-huh.

20 OIG SA GOSSARD: -- her testimony -- her
21 statement is you told her that you're not going
22 to turn over the tapes, okay?

23 MS. GRIMES: No.

24 OIG SA GOSSARD: And then she walks
25 over -- you know, and she didn't tell me this,

1 I learned this through another interview
2 because the other party happened to be in the
3 area. Again, not together, but in the area at
4 the same hotel having their meeting, talking to
5 management people, and Stokes walks over and
6 tells them there are not going to be any tapes
7 turned over.

8 MS. GRIMES: Well, see, I -- I can't speak
9 to that. Stokes asked me to contact my
10 attorney.

11 OIG SA GOSSARD: And so, you know, I would
12 ask that you -- you know, you put yourself in
13 my position as an investigator when I got four
14 people telling me this.

15 MS. GRIMES: You got one person. Don't --
16 don't include these people who are not -- who
17 are not here. They're not -- they have no
18 direct knowledge.

19 OIG SA GOSSARD: Well, they corroborate
20 what Stokes said. You know, they -- they
21 corroborate that, you know, hey, yeah, we told
22 Stokes that we want to listen to the tapes.
23 And Stokes testifies she went to you, they want
24 to listen to the tapes. Oh, well, I'm going to
25 have to think about that. I'm going to have to

1 talk to my attorney about that.

2 MS. GRIMES: She did not. She did not.
3 She came to me. She asked me about evidence.
4 She asked me about turning over evidence, about
5 giving them some sign of good faith. Some sign
6 of good faith. You know, we're all here for
7 good faith. Give them some sign of good faith,
8 okay.

9 I told her that I would call Scott and
10 talk to him about it, which I did. And I've
11 already told you what he said --

12 OIG SA GOSSARD: Uh-huh.

13 MS. GRIMES: -- when I called him. So I
14 called her back to say that. We show up here
15 Friday, nothing is really discussed. I mean,
16 we come in. Everybody says, well -- she says
17 well, I hate to leave it at this, you know,
18 it's, you know, I had really hoped to resolve
19 this. And I said I had too. And basically
20 that's it, there's no more back and forth on
21 Friday. The back and forth happened on
22 Thursday, and -- and I --

23 OIG SA GOSSARD: Okay.

24 MS. GRIMES: I am not aware of the whole
25 audiotape thing that's going on in -- in her

1 mind, but I have to say --

2 OIG SA GOSSARD: In her mind?

3 MS. GRIMES: Well, obviously. Obviously.

4 Because you have told me that she's telling
5 them these things, that she wrote these notes
6 out.

7 OIG SA GOSSARD: Uh-huh.

8 MS. GRIMES: That has to be what's going
9 on in her mind, because she wouldn't have made
10 the notes, she wouldn't have gone and talked to
11 them about it. There wouldn't be this whole
12 different issue going on behind the scenes if
13 it wasn't in her mind.

14 OIG SA GOSSARD: And so she's making these
15 notes, these things are going on in her mind,
16 she's relaying these things to the management
17 folks, and then she's coming back to you, and
18 the word "tape" is not coming up?

19 MS. GRIMES: The word "tape" is not coming
20 up.

21 OIG SA GOSSARD: Never once --

22 MS. GRIMES: Never once.

23 OIG SA GOSSARD: -- over the two-day
24 course?

25 MS. GRIMES: Never once. Recordings, a

1 bunch of times. Recordings, records. Not
2 documents. She never used documents.

3 OIG SA GOSSARD: Uh-huh.

4 MS. GRIMES: But it was always, you know,
5 about -- about that, where she's thinking one
6 thing, I'm thinking another thing. But -- but
7 I'm going to be frank with you, the most
8 disturbing thing to me about this whole
9 interview is that you didn't believe me before
10 I even got here.

11 OIG SA GOSSARD: That's not true.

12 MS. GRIMES: It is true. You told me that
13 you talked to her --

14 OIG SA GOSSARD: Uh-huh.

15 MS. GRIMES: -- and the two of you
16 discussed what I might say to be able to get
17 out of this.

18 OIG SA GOSSARD: Yeah, as I -- as I --

19 MS. GRIMES: And I have no --

20 OIG SA GOSSARD: As I do, like I told you,
21 in every interview. You know, I -- I interview
22 hundreds of people a year. Okay?

23 MS. GRIMES: I'm sure you do.

24 OIG SA GOSSARD: And I would be remiss in
25 my duties if I didn't know going into that

1 interview the possible things that people are
2 going to say to try to, you know, shield
3 themselves from the allegations.

4 MS. GRIMES: From what? Shield myself
5 from what? From tape-recording an AUSA? I
6 never tape-recorded an AUSA. I have no need to
7 shield myself from that. It never happened. I
8 never did it. You know, the -- the whole bone
9 of contention here is the discussion between
10 Stokes and I. Okay. That's -- that's the
11 whole bone of contention. Okay.

12 I am not saying she's lying. I don't
13 think she would lie. I'm saying that I think
14 she misunderstood, or there was a
15 miscommunication, or something was taken out of
16 context.

17 OIG SA GOSSARD: And again, I would agree
18 with you 100% if it happened on, you know, one
19 quick occasion, on a phone call, or something
20 like that. I could -- I could absolutely agree
21 with you, Ms. Grimes; but again, going back and
22 forth over a two-day period --

23 MS. GRIMES: One-day period.

24 OIG SA GOSSARD: Okay.

25 MS. GRIMES: A one-day period. The second .

1 day we did not go back and forth.

2 OIG SA GOSSARD: Yeah. And a phone call
3 at the hotel, all those things.

4 MS. GRIMES: Uh-huh.

5 OIG SA GOSSARD: You know --

6 MS. GRIMES: Yeah.

7 OIG SA GOSSARD: I've got to tell you,
8 I've got my doubts.

9 MS. GRIMES: Well, you know, you can have
10 your doubts, but what I've told here today is
11 the whole truth, and nothing but the truth.
12 And, you know, it is what it is, and --

13 OIG SA GOSSARD: Okay. I think that about
14 wraps it up on our end.

15 Do you have anything else?

16 OIG SA VAN NIMWEGEN: No, I don't.

17 OIG SA GOSSARD: Do you have any questions
18 for us?

19 MS. GRIMES: I do not. Oh, I do want to
20 have a copy of my statement.

21 OIG SA GOSSARD: Of your statement?

22 MS. GRIMES: Yes. Today.

23 OIG SA GOSSARD: Today?

24 MS. GRIMES: The interview. The interview
25 that I've given today.

1 OIG SA GOSSARD: Oh, well, when the
2 investigation's done, you can request that
3 through our General Counsel. And I'm glad --
4 you know, I can't speak for them, but I think
5 it's typically shared at that time.

6 MS. GRIMES: Okay. So, when should I be
7 expecting the next action?

8 OIG SA GOSSARD: I can't say for sure.
9 All's I can say is I'll take this information,
10 I'll do up my report, and that'll be reviewed
11 by the folks in my chain of command, and then
12 that will be forwarded to the --

13 MS. GRIMES: But your report is going to
14 say that you think I'm lying.

15 OIG SA GOSSARD: I don't know what my
16 report is going to say right now.

17 MS. GRIMES: And that you believe
18 Ms. Stokes, because that's what you have told
19 me today. You told me that.

20 OIG SA GOSSARD: Well, again, I'm telling
21 you from -- from what I could see, again all
22 this back and forth, these folks' statements
23 all, you know, corroborating each other's,
24 particularly --

25 MS. GRIMES: They weren't there.

1 OIG SA GOSSARD: Ms. -- Ms. Stokes.

2 MS. GRIMES: They weren't there. You keep
3 including the people who weren't there. These
4 conversations were between me and Ms. Stokes.
5 Me and Ms. Stokes.

6 OIG SA GOSSARD: Uh-huh.

7 MS. GRIMES: There were no other people
8 there. There were no other witnesses.
9 Whatever she may have said to them, whatever
10 she may have written down, I was not privy to
11 those thought processes. I was not privy to
12 those conversations. So it is not fair to say
13 well, I've got four people saying this, because
14 those four people are feeding -- or those three
15 people are feeding off of what's going on in
16 her mind, what's going on in her perception.

17 OIG SA GOSSARD: No, they're corroborating
18 what she allegedly told you, because they're
19 telling her to tell you that. In other words,
20 if Menner is saying go tell her we want to
21 listen to the tapes, if he tells me that in an
22 interview, and then Stokes in her independent
23 interview says Menner told me to go tell her
24 that they want to listen to the tapes, and she
25 comes in and she states in her interview that

1 she said they want to listen to the tapes,
2 alright, those are corroborating statements.
3 He's corroborating to a degree, okay. Whether
4 she told you that or not, he can't say, you're
5 absolutely right. But it tends to corroborate
6 it. Okay? It's not like it just came from
7 Stokes, and Stokes only. You know, she did
8 that on her own. Okay. You got Menner in an
9 interview saying I want to listen to the tapes,
10 that changes everything. Go tell her we want
11 to listen to the tapes. Grimes. Okay, I'll do
12 that. Goes, comes back, you know, relays your
13 response. Okay. Those are corroborating
14 statements.

15 MS. GRIMES: They may be corroborating
16 statements, but there are three parts to any
17 communication. To the one we're having right
18 now there are three parts. That part is I am
19 speaking, you are listening, and you are
20 hearing, but your -- what your perception is of
21 what I'm saying is based on a lot of other
22 things. I think predominantly what you
23 consider to be testimony that is more
24 believable than mine.

25 OIG SA GOSSARD: That's your perception.

1 MS. GRIMES: It is.

2 OIG SA GOSSARD: Okay.

3 MS. GRIMES: It is my perception.

4 OIG SA GOSSARD: Do you have anything
5 else?

6 MS. GRIMES: I have nothing.

7 OIG SA GOSSARD: Alright.

8 This is Special Agent Ron Gossard. The
9 time now is 12 -- approximately 12:25 p.m. on
10 March 27th.

11 I'm going to discontinue the recording at
12 this time.

13 (Whereupon, the interview was concluded.)

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READING AND SIGNING

I have read the above transcript,

() The transcript is true, correct, and completely accurate.

() The transcript is true, correct, and accurate, except as set forth in my List of Corrections attached hereto, citing page, line, and reason for correction realizing that, for this purpose, I am still under oath.

(DATE) (WITNESS)

Sworn to and subscribed before me this ___ day of _____, 2008.

Notary-Public

CERTIFICATE

STATE OF FLORIDA:

: SS.

COUNTY OF PALM BEACH:

I, Tammi Turner, certify that the
the foregoing proceedings were transcribed
from audiotaped proceedings and that the
transcript is a true and correct record
from such recording.

Tammi Turner,

NOTARY PUBLIC AT LARGE

Commission# DD147173

Expires Oct 09, 2010

* E R R A T A S H E E T *

2	PAGE NO. AND LINE	CORRECTIONS
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UNITED STATES DEPARTMENT OF JUSTICE
Office of the Inspector General

WARNINGS AND ASSURANCES TO EMPLOYEE REQUIRED
TO PROVIDE INFORMATION

You are being asked to provide information as part of an inquiry being conducted by the Office of the Inspector General. This inquiry is being conducted pursuant to the Inspector General Act of 1978, as amended.

This inquiry pertains to allegations of unauthorized disclosure of sensitive law enforcement information.

You have a duty to reply to the questions posed to you during this interview and agency disciplinary action, including dismissal, may be undertaken if you refuse to answer or fail to reply fully and truthfully.

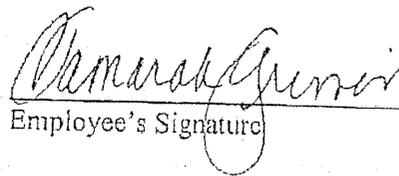
Neither your answers nor any information or evidence gained by reason of your answers can be used against you in any criminal proceeding. However, if you knowingly and willfully provide false statements or information in your answers, you may be criminally prosecuted for that action. The answers you furnish and any information or evidence resulting therefrom may be used in the course of agency disciplinary proceedings.

ACKNOWLEDGMENT

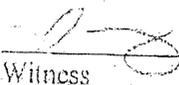
I have read and understand my rights and obligations as set forth above.



Office of the Inspector General
Special Agent



Employee's Signature



Witness

3/27/08

Date

11:04 A.M. (CT)

Time

Montgomery, AL

Place