

UNITED STATES OF AMERICA
NUCLEAR REGULATORY COMMISSION

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OFFICE OF INVESTIGATIONS

INTERVIEW

-----X
IN THE MATTER OF: :

INTERVIEW OF :

Docket No.

(REDACTED) 7C :

(not provided)

(CLOSED) :

-----X
Wednesday, May 19, 2004

Location: (Not provided)

The above-entitled interview was conducted
at (time not provided).

BEFORE:

Special Agent (Not provided).

EXHIBIT 44
PAGE 1 OF 50 PAGE(S)

2003-045

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FOIA 2005-194

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PROCEEDINGS

(Not provided)

SPECIAL AGENT: -- Kim Harvey, CC [REDACTED]

[REDACTED] Did I say that right?

[REDACTED] Yes, [REDACTED]

SPECIAL AGENT: And [REDACTED]

[REDACTED] Yes.

SPECIAL AGENT: Is that the email you're talking about?

[REDACTED] Yes.

SPECIAL AGENT: Okay. Good. The version that I have down at the bottom in handwriting it says [REDACTED] please follow-up." Do you see that?

[REDACTED] Yes.

SPECIAL AGENT: And what were you -- do you know what you were told to follow-up on?

[REDACTED] Well, my piece of this was the system related, SAP system related. I was responsible for having her change within SAP from service corporation over to the power or the nuclear corporation.

SPECIAL AGENT: What did that mean practically though?

[REDACTED] Within the system, changing

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1 dates as she is now a nuclear employee, Info Type 315,
2 and her reporting relationship on the PD side. The PA
3 and the PD side of SAP.

4 SPECIAL AGENT: What's PA?

5 (REDACTED): Personnel Administration.

6 SPECIAL AGENT: Okay.

7 (REDACTED) And the PD side is the
8 Personnel Development in reference to two different
9 systems I had access. The client consultant's role
10 was to prepare the PD side, to show who she reported
11 to and what company she was going to be getting paid
12 from.

13 SPECIAL AGENT: All right. Now if you
14 look at the email for a minute, the third sentence
15 reads, and I'll read it for the record. "This will be
16 considered a "rotational assignment". Do you know
17 what that meant back then in that time period? What
18 would that mean?

19 (REDACTED) My understanding of
20 rotational assignments have been rotational
21 assignments that people would -- their title would
22 stay the same. Their salary would stay the same.

23 SPECIAL AGENT: Right.

24 (REDACTED) And it would be -- a
25 rotational assignment is either a year, two year

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1 assignment, and then they would go back to either
2 where they came from or to another position.

3 SPECIAL AGENT: Continuing on in that
4 sentence is reads, "With the understanding that there
5 are no guarantees beyond that." Try and put yourself
6 back in -- I know it's a while ago, back in October of
7 2001. Do you recall being present for any discussions
8 where that was discussed and what that actually meant
9 that there would be no guarantees beyond that? Do you
10 recall what was meant by that?

11 (REDACTED) No, I don't remember. I know
12 I did not have any conversations with anyone in
13 reference to what that actually meant.

14 SPECIAL AGENT: (REDACTED) any of
15 those people?

16 (REDACTED) No.

17 SPECIAL AGENT: How about Kim Harvey, in
18 other words, back then having discussions with her
19 about what that meant?

20 (REDACTED) No.

21 SPECIAL AGENT: All right. Next sentence
22 reads, "We will discuss her status towards the latter
23 part of 2002." Were you part of any discussions
24 surrounding that in the latter part of 2002?

25 (REDACTED) No.

1 SPECIAL AGENT: All right. The last
2 sentence, I guess I could ask you something about
3 that. It reads, "She will continue to have her
4 expenses paid for by your organization for 2002."
5 What type of expenses were they referring to there? Do
6 you know?

7 [REDACTED]: I know she was receiving some
8 type of expenses because she was reporting down here
9 on a temporary assignment.

10 SPECIAL AGENT: Right.

11 [REDACTED]: She was receiving expenses,
12 whether it be mileage, rent, I don't know exactly what
13 that was, but that -- she was receiving expenses.
14 That's all I know.

15 SPECIAL AGENT: Okay. That sentence
16 though, I mean, the decision is made where Kim is
17 going to be on nuclear business unit payroll for '02.
18 She's going to be working down here.

19 [REDACTED]: Yes.

20 SPECIAL AGENT: Yet, the last sentence
21 indicates that she will continue to have expenses paid
22 for her for the year 2002. Was that an unusual
23 situation, that even though she was going to be
24 working down here full-time and transferred down to
25 here, she'd still be getting expenses paid? Is that

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1 something that you considered unusual back then? It's
2 an opinion question, I guess.

3 [REDACTED] Okay.

4 SPECIAL AGENT: Do you have an opinion on
5 whether that is unusual or not?

6 [REDACTED] Yes, I have an opinion, but
7 normally we do not -- if a person is assigned to a
8 location, we normally do not pay expenses.

9 SPECIAL AGENT: Okay.

10 [REDACTED]: I mean, even for my own
11 situation, we are not nuclear folks. We're corporate
12 services assigned down here.

13 SPECIAL AGENT: Right.

14 [REDACTED]: And we do not receive
15 expenses. So yes, it was unusual because she was
16 being assigned down here; however, still continuing to
17 receive these expenses that she was receiving while
18 she was on temporary assignment.

19 SPECIAL AGENT: Do you know why she was
20 allowed to still receive those expenses for the year
21 2002?

22 [REDACTED] No, I don't know why.

23 SPECIAL AGENT: All right. Okay. You can
24 put that aside.

25 [REDACTED]: Okay. I guess maybe I could

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1 ask you a question about what your job duties were
2 back in October, 2001 time period. Can you go into
3 that maybe a little bit? And where you have change
4 from that point going forward.

5 [REDACTED]: Okay. My job duties are
6 basically, I'm a [REDACTED] I get
7 involved in litigation, EEOC complaints, IBEW
8 grievances, Fourth Steps, arbitrations. I also -- one
9 of the positive sides of my job has always been salary
10 planning.

11 SPECIAL AGENT: I have a positive side of
12 my job too.

13 [REDACTED] Everything else seems pretty
14 negative. So yes, that's our side of the house, the
15 negative piece pretty much.

16 SPECIAL AGENT: And would you have been
17 doing that in [REDACTED]

18 [REDACTED] Yes.

19 SPECIAL AGENT: [REDACTED]

20 [REDACTED] Yes, and I continue today.

21 SPECIAL AGENT: To today. Okay. All
22 right.

23 [REDACTED]: I should discharges too, but
24 that's outside of -- that's normal. Our pieces are
25 discharges, because it's always there's some

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1 involvement in reference to disciplines, outcome of a
2 discipline could be a discharge.

3 SPECIAL AGENT: Okay. So you're involved
4 in the disciplinary actions that are taken against
5 nuclear business union employees?

6 [REDACTED] Yes.

7 SPECIAL AGENT: Up to and including
8 voluntary separations.

9 [REDACTED] Yes.

10 SPECIAL AGENT: Okay. All right. Switch
11 back to talking about Kim Harvey now a little bit.

12 [REDACTED] Okay.

13 SPECIAL AGENT: You said that you remember
14 seeing her at some point working down here. You're
15 not sure when that was. But then she was formally
16 transferred down to here working for [REDACTED] I guess in
17 very late 2001, but she'd be on the books for the
18 whole year 2002 down here as an employee.

19 [REDACTED] Correct.

20 SPECIAL AGENT: Okay. At any point, did
21 you hear of concerns being raised regarding Kim
22 Harvey's -- the way she treated people down here, the
23 way she interacted with people? And I'm being really
24 general now, I'm asking about that, but at any point
25 did you start hearing concerns or complaints raised

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1 regarding those two areas surrounding Kim Harvey?

2 (b) I'm not sure of the time
3 frame, whether it was 2001, 2002. No one actually
4 came directly to me and voiced a concern. There
5 seemed to be a lot of, I don't know, rumors that she
6 was providing direction to some of our managers in
7 reference to their interactions and what they should
8 be doing better in helping the plants, in situations
9 within the plants, surrounding their management, their
10 communications, and how they can better assist the
11 plant managers, supervisors, superintendents, those
12 types of folks. But, I mean, I heard that basically
13 from (b) and (b)

14 SPECIAL AGENT: About that issue right
15 there?

16 (b) Yes.

17 SPECIAL AGENT: And what was wrong with
18 that? I don't know. What was wrong with her -- if
19 she were doing that, what was viewed as being wrong in
20 her doing that?

21 (b) Just maybe the way it was
22 said to (b) that they had not been players
23 with the team, that Kim was trying to help them. But
24 in their eyes it was not going to be beneficial
25 because they thought they were already being players

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1 on the team, and doing everything they could to assist
2 those managers.

3 SPECIAL AGENT: Okay. So these are the
4 two people who are bringing this -- who you're hearing
5 this concern from, and it's regarding their
6 interactions with Kim?

7 (b) Right.

8 SPECIAL AGENT: And Kim thinking she's
9 trying to help them?

10 (b) Yes.

11 SPECIAL AGENT: All right. Did you hear
12 any concerns or complaints raised about Kim doing
13 personal type of business at work, because I know she
14 came from like the consultant type of history, and she
15 had her own company. She'd written a book or two.
16 Did you hear any complaints about her -- any kind of
17 inappropriate action where it was viewed that the
18 information she was giving out might be somehow
19 beneficial to her from a personal standpoint, personal
20 business standpoint, like integrity kind of issue?

21 (b) The only time -- oh, gosh.
22 My dealings with Kim, I'm going to talk about the (b)
23 (b) arbitration. In preparing for an arbitration in
24 March, I think we had a date of March 3rd, 4th, or 5th,
25 sometime, as far as the preparation --

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1 SPECIAL AGENT: What year?

2 (b) 2003.

3 SPECIAL AGENT: Okay.

4 (b) In preparations for those
5 arbitrations, we get together and prepare, of course,
6 with our company attorneys and the departments. And
7 a request had been made by the attorneys that I review
8 emails, and they had asked me to look at (b) emails,
9 emails, as well as (b) and they also asked
10 me to look at Kim Harvey's emails, because they had
11 gotten word that Kim had had discussions or emails
12 back and forth with (b) So at that time, I
13 did request IT to allow me to have access to her
14 emails, and I read through all of her emails. And I
15 could see through her emails that she had been
16 conducting personal business through her emails from
17 her company equipment.

18 SPECIAL AGENT: Like what, what kind of
19 personal business?

20 (b) She was emails back and forth
21 on eBay.

22 SPECIAL AGENT: Okay.

23 (b): Sending email messages to -
24 gosh, I don't know what the proper term is, but her
25 friends and what have you on that form.

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1 SPECIAL AGENT: Okay. That's fine.

2 [REDACTED] All right. And, of course,
3 she had also other emails to herself that she had
4 written about other people.

5 SPECIAL AGENT: What you saw there, did
6 that rise to a level where you felt it had to be
7 reported formally to someone here to be investigated
8 or reviewed?

9 [REDACTED] I did forward all of the --
10 I did have a copy of all the emails, and I notified
11 [REDACTED] of the inappropriate -- [REDACTED]

12 SPECIAL AGENT: [REDACTED] Okay.

13 [REDACTED] And he then informed, I
14 believe, [REDACTED] as well as [REDACTED].

15 SPECIAL AGENT: Any more on that? I'll
16 have another question.

17 [REDACTED] Okay.

18 SPECIAL AGENT: Do you know what was done
19 about that? What, if anything, was done?

20 [REDACTED] The timing of it was about
21 the same time that we were -- we had just been told to
22 prepare the separation package, and I don't know that
23 anything that was done with it.

24 SPECIAL AGENT: Okay. Let me be a little
25 more specific.

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([REDACTED]) Okay.

SPECIAL AGENT: From what I've learned in talking to people is that Kim received some type of counseling, verbal counseling, because she had given a couple of her books out, and the appearance was that she may have been soliciting business of some sort.

([REDACTED]) Oh, I'm not aware of that.

SPECIAL AGENT: All right.

([REDACTED]) But she had given me prior to -- she had also given me a copy of her little book. I don't even know what it's called, but at a meeting that we had way back when she first came down here.

SPECIAL AGENT: Are you aware of any integrity investigations being done regarding Kim Harvey down here?

([REDACTED]) Not that I was aware of.

SPECIAL AGENT: All right. Still talk about the same theme here, concerns, complaints that are brought to your attention regarding Kim Harvey's activities, interactions, and I think you --

([REDACTED]) Yes.

SPECIAL AGENT: Were any such concerns or complaints made that she was intimidating people down here at the site? Throwing her weight around? I mean, not that kind of weight, but like just making

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1 people cry at meetings. Did you hear anything about
2 those three things I just brought up, any concerns
3 raised in those areas?

4 [REDACTED] Again, there was a lot of
5 scuttlebutt going around, but no one specifically came
6 to me to complain.

7 SPECIAL AGENT: What was the scuttlebutt
8 going around?

9 [REDACTED] Scuttlebutt was that she
10 would always get emotional at meetings no matter what
11 the subject was.

12 SPECIAL AGENT: What do you mean by
13 emotional? What was meant by that?

14 [REDACTED] Emotional, she would cry.
15 She would become very upset, cry, and I believe the
16 union referred to her as Dr. Love.

17 SPECIAL AGENT: Who from the union were
18 referred to that way?

19 [REDACTED] I heard that come out of
20 [REDACTED] mouth.

21 SPECIAL AGENT: In a positive sense or a
22 derogatory sense? Which way did you take it?

23 [REDACTED] I took it as derogatory.

24 SPECIAL AGENT: Okay.

25 [REDACTED] The one meeting I can

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1 remember, it was a company union meeting. It was
2 operations. We had the union there. The company was
3 there, and Kim arrives, and we had a lot of -- it
4 seems like problems, concerns over in Salem
5 operations, and we were trying to work through that,
6 and everybody -- and for consistency had all the
7 management team and all of operations, all the union
8 folks together, and we were trying to get things
9 resolved. And Kim would try to facilitate those
10 meetings, and to provide harmony and that type of
11 thing, where the union is -- you know, they're putting
12 their foot in the ground on this side, the company is
13 putting their foot in the ground over here in
14 reference to - well, this is what we think is right to
15 do, and Kim was just trying to get us all to work
16 better together.

17 SPECIAL AGENT: That's not a bad thing
18 though, is it?

19 (REDACTED): No. Of course it's not a bad
20 thing, but --

21 SPECIAL AGENT: But what?

22 (REDACTED): The company and the union --
23 I mean, we get along. We have conversations. We can
24 be confrontational, outbursts, but we normally walk
25 away from the table, we're done. We can still

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1 continue to talk, but there's no personal concerns in
2 reference to what's said or what have you.

3 SPECIAL AGENT: Okay.

4 (REDACTED) I don't take anything
5 personal. If I get a little loud and obnoxious with
6 (REDACTED) on the other hand, he can get loud with
7 me in reference to a situation, and I don't take it
8 personally.

9 SPECIAL AGENT: Okay. How about concerns
10 or complaints made to you or brought to your attention
11 that Kim Harvey treated individuals badly? Anything
12 like that?

13 (REDACTED) Not that I recall.

14 SPECIAL AGENT: How about concerns raised
15 regarding expenses she was claiming?

16 (REDACTED) I have --

17 SPECIAL AGENT: Did that come to your
18 attention that there were such concerns raised about
19 that?

20 (REDACTED): I know I had a conversation
21 with Kim one time or another with reference to her
22 expenses. I believe it was in (REDACTED) absence, because
23 she had already had previous discussions with (REDACTED)
24 around her expenses. And he must have been out, and
25 she had called me, and I followed up with (REDACTED)

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1 And, of course, [REDACTED] went into a little bit more
2 detail than I wanted to know about what was going on.
3 It was just --

4 SPECIAL AGENT: Go ahead and tell me about
5 that. What do you mean by that?

6 [REDACTED] Well, she apprized me at that
7 time that she was -- her expenses -- she was providing
8 expense reports for trips that did not have -- she may
9 have had the trip, but the expenses were not
10 outrageous, and what we would normally submit for
11 expenses, and the receipts - she was taking additional
12 trips and the company was paying for them. And I
13 asked [REDACTED] at the time - I said, "Well, do you want
14 us to do an investigation, or what do you want us to
15 do?" And at that time she just said, "Well, just hang
16 on to the information. Don't worry about it", not to
17 worry about it, but just she had it, and she was going
18 to look into it.

19 SPECIAL AGENT: She had it, meaning [REDACTED]
20 has the information?

21 [REDACTED] That she knew it, right.

22 SPECIAL AGENT: And [REDACTED] said she was
23 going to look into it.

24 [REDACTED] Yes.

25 SPECIAL AGENT: Okay. Do you remember

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1 when that might have occurred, that conversation?

2 [REDACTED] That had -- time frame. That
3 had to have been January/February of '03.

4 SPECIAL AGENT: Okay. I talked about a
5 couple of general areas of whether or not concerns
6 were brought to your attention regarding Kim Harvey's
7 interactions with people down here and stuff like
8 that. Is there something that I didn't ask in that
9 area that you want to bring up now? Is there
10 anything?

11 [REDACTED] No, not that I'm aware of.

12 SPECIAL AGENT: It's an open question.

13 [REDACTED] Okay.

14 SPECIAL AGENT: Just looking to see if
15 there's something that you have that I didn't ask you
16 about in that area. Is there?

17 [REDACTED] No.

18 SPECIAL AGENT: If you think of something
19 bring it up. It's 2:54. I'm going to take a short
20 break.

21 (Off the record.)

22 SPECIAL AGENT: Okay. It's about 3:00 in
23 the afternoon. We're back on the record. I wonder if
24 you can comment on this a little bit, [REDACTED] I've seen
25 Kim Harvey's job description called a couple of

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1 different things, cultural change manager. What was
2 her job title? Do you know?

3 (b) (7)(C) Within the SAP system her
4 title was OD Consultant.

5 SPECIAL AGENT: What does that mean?

6 (b) (7)(C) Organizational Development
7 Consultant.

8 SPECIAL AGENT: Why would the term
9 consultant be attached to a permanent employee? Did
10 that have any significance?

11 (b) (7)(C) My title is (b) (7)(C) nc

12 (b) (7)(C)
13 SPECIAL AGENT: Okay. So what does that
14 mean then, consultant?

15 (b) (7)(C) I consult with managers,
16 supervisors, superintendents in reference to HR
17 policies, procedures, and practices. I'm not sure
18 what Kim's job description may have read, but it's a
19 title that we've used within PSE&G, consultant.

20 SPECIAL AGENT: Okay. Let's talk about
21 position elimination. Okay. Kim's position being
22 eliminated. When did you first learn that her
23 position may be eliminated, the key term is "may".

24 (b) (7)(C) Yes.

25 SPECIAL AGENT: When would that have been? C

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1 () That would have been -- I
2 don't have any records to reflect it. I have a
3 spreadsheet where I prepared payout documentation for
4 finance. () left me a voicemail in say late
5 January of '03 to prepare a separation package, and to
6 get that up to ()

7 SPECIAL AGENT: Package for whom?

8 () Kim Harvey.

9 SPECIAL AGENT: Do you still have that
10 voicemail?

11 () No.

12 SPECIAL AGENT: Is there any way to
13 retrieve it?

14 () I don't know.

15 SPECIAL AGENT: Okay. So you get this
16 voicemail message from () asking you to prepare a
17 separation package for Kim Harvey. Okay. Did you
18 then begin preparing that package?

19 () Right. Because I was also in
20 the process of preparing separation packages for the
21 Administrative Support Group, and they were going to
22 be released out of here or notified in February that
23 their positions were eliminated. And () had wanted
24 me just to add her to that list.

25 SPECIAL AGENT: Okay. Do you have that

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1 list? Did you generate a list back then?
2 ([REDACTED]) There was a list for the
3 finance group in reference to -- there's not a date on
4 that either, but what their payouts would have been.

5 SPECIAL AGENT: I don't think I have any
6 of that information. I asked last week if there was
7 a way that the IT group down here in nuclear could go
8 into your computer and find out when that was drafted.
9 I know where I work that could be done. I don't know
10 how to do it, but I know there's people that know how
11 to do it.

12 ([REDACTED]) Yes.

13 SPECIAL AGENT: Jeff, I'd ask if the
14 search of [REDACTED] -- do you think you might still
15 maintain that document in your computer?

16 ([REDACTED]) In my computer, I'm sure I
17 still have it there.

18 SPECIAL AGENT: Okay. Well, then there
19 should be a date on it in the computer.

20 ([REDACTED]) I saved it, yes.

21 SPECIAL AGENT: Okay.

22 ([REDACTED]) When it was created.

23 SPECIAL AGENT: Yes.

24 ([REDACTED]) Okay.

25 SPECIAL AGENT: And again, this is the

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1 construction of that separation letter.

2 (b)(7)(C) Yes.

3 SPECIAL AGENT: Do you think you have that
4 in a Word file?

5 (b)(7)(C) It's probably Excel, an Excel
6 file. The actual separation agreement is in a Word
7 file.

8 SPECIAL AGENT: Okay.

9 UNIDENTIFIED: We'd be glad to supply
10 that. And don't delete it or try to verify and
11 ascertain the origination date.

12 (b)(7)(C) Okay.

13 UNIDENTIFIED: That's an important piece.

14

15 Special AGENT: Yes, that is. That's what
16 I'm looking for, the origination date - not only of
17 that, but also of the separation letter, the 45-day
18 letter and the separation agreement.

19 (b)(7)(C) It's all in that same
20 package, yes.

21 SPECIAL AGENT: Okay.

22 (b)(7)(C) I know my draft had a
23 February blank, 2003.

24 SPECIAL AGENT: I'm going to show you that
25 in a few minutes.

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([REDACTED]) Okay.

SPECIAL AGENT: So you get this voicemail from ([REDACTED]) Right? What makes you remember getting that? I'm wondering why you remember getting that voicemail message. Tell me why you recall that.

([REDACTED]) Whether it was a voicemail or just a face-to-face, ([REDACTED]) can you prepare a package for Kim Harvey for ([REDACTED]) review.

SPECIAL AGENT: Okay.

([REDACTED]) Because like I said, I was in the process of preparing these packages for that Administrative Support Group.

SPECIAL AGENT: And was that one of your normal job functions to do that kind of work?

([REDACTED]) Yes. I supported ([REDACTED]) and he was looking at all of his positions, all of his positions that rolled up to him. We had completed the Technology Integration Group earlier in 2002, and this was the second group, the Administrative Support Group, that their positions had been re-reviewed and we were getting ready to notify those folks.

SPECIAL AGENT: How sure are you that ([REDACTED]) communicated that to you either by voicemail or in person? How sure are you that that occurred in

1 late January, '03?

2 [REDACTED] I'm 100 percent sure.

3 SPECIAL AGENT: You are?

4 [REDACTED] Yes.

5 SPECIAL AGENT: Okay. How can you be 100
6 percent sure? I want to --

7 [REDACTED] Because, I mean, he's the one
8 who is my supervisor. He gives me direction and tells
9 me what to do.

10 SPECIAL AGENT: Okay.

11 [REDACTED] And when it's [REDACTED] -- when
12 you're asked to do a separation agreement, you
13 remember those types of --

14 SPECIAL AGENT: Okay. All right. You
15 mentioned something about [REDACTED] people who were
16 also being separated, their -- something about that
17 getting reviewed and approved. Was Kim's separation
18 also reviewed and approved by someone?

19 [REDACTED] Not to my knowledge. Like I
20 said, I was told just to put her on the list.

21 SPECIAL AGENT: Right.

22 [REDACTED] And to provide the
23 information to [REDACTED] as far as what a separation
24 agreement looked like, because they wanted her to have
25 the same date as the others, and the others were

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25
1 notified on February 3rd. That's what's on their
2 letters.

3 SPECIAL AGENT: But she wasn't notified on
4 February 3rd.

5 ([REDACTED]) She was not notified, no.

6 SPECIAL AGENT: Do you know why?

7 ([REDACTED]) No, I don't know why.

8 SPECIAL AGENT: Now you mentioned
9 something now about those other positions, the
10 decision to eliminate them was reviewed or approved.

11 ([REDACTED]) There is a change management
12 form that we ask the managers to put together, and
13 pretty much it's like a communications package
14 identifying to us what the positions are, who is doing
15 what, and who is going to be doing this type of work
16 if this person is going to be released or what.

17 SPECIAL AGENT: Do you know if that was
18 done for Kim's position?

19 ([REDACTED]) That I don't know.

20 SPECIAL AGENT: Do you know who would be
21 responsible for doing it, if it were done? Would it
22 have been ([REDACTED])

23 ([REDACTED]): It would have been the
24 manager of the department, that's the process. Just
25 like ([REDACTED]) had done for the TI group, or the --

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1 SPECIAL AGENT: So who would that be for

2 --

3 ([REDACTED]) It would have been ([REDACTED]) 7c

4 ([REDACTED])

5 SPECIAL AGENT: Okay. So getting back to

6 ([REDACTED]) ([REDACTED]) communicates this to you in late

7 January '03. During that first discussion, did he

8 tell you the basis for why he asked you to do that?

9 Why it was being done?

10 ([REDACTED]) No.

11 SPECIAL AGENT: At some point, did you

12 learn why Kim's position had been eliminated?

13 ([REDACTED]) No.

14 SPECIAL AGENT: Did you ever ask anybody?

15 ([REDACTED]): No, because at the same time,

16 that letter, that October 31st, '01 letter, I was

17 asked to pull that.

18 SPECIAL AGENT: By who?

19 ([REDACTED]) ([REDACTED])

20 SPECIAL AGENT: Okay. When were you asked

21 by [REDACTED] to do that?

22 ([REDACTED]) I believe that was during the

23 discussions around the expenses. And again, that had

24 to have been January/February '03 time frame.

25 SPECIAL AGENT: Okay. Your understanding

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1 was [REDACTED] asked you for that in relation to expenses
2 Kim was claiming, or had claimed?

3 [REDACTED] Yes.

4 SPECIAL AGENT: Are you sure?

5 [REDACTED] Yes.

6 SPECIAL AGENT: Okay. Get back, talk to
7 [REDACTED] He gave you this -- he communicates this to
8 you, that this is what he would like you to do, to
9 begin preparing a separation package for Kim. Did you
10 then go ahead and do that?

11 [REDACTED] Yes.

12 SPECIAL AGENT: Okay. Was it boilerplate
13 document, and you just plugged in her name on it?

14 [REDACTED] Yes.

15 SPECIAL AGENT: Okay.

16 [REDACTED] Adjusted some dates to make
17 it apply to the time frame.

18 SPECIAL AGENT: Okay. And what time frame
19 are you looking at, or what time frame was being
20 looked at for that to actually occur?

21 [REDACTED] The time frame was, like I
22 say, we have a copy of a draft where the date starts
23 off with February blank, 2003.

24 SPECIAL AGENT: Is this the document
25 you're talking about?

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1 (b) Yes.

2 SPECIAL AGENT: For the record, what I'm
3 showing (b) is a -- has draft marked at the top,
4 February blank, 2003, to Ms. Kim Ritigliano. It
5 begins reading, "As a result of organizational
6 changes, your position has been eliminated." Is that
7 the document that you're talking about?

8 (b) Yes.

9 SPECIAL AGENT: Would you have drafted
10 that yourself?

11 (b) Yes.

12 SPECIAL AGENT: Okay. That's one of the
13 documents I'd ask to have researched to see the
14 origination date of it, and I'm going to get that, I
15 guess.

16 (b) Okay.

17 SPECIAL AGENT: Are you pointing to the
18 last page, or what are you pointing at?

19 (b): This last page, the
20 spreadsheet in reference to what she would be paid if
21 she were to leave the organization and sign a
22 separation agreement.

23 (Off the record.)

24 SPECIAL AGENT: It says draft separation
25 package. Looking at this -- in that regard.

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16

1 (Off the record.)

2 SPECIAL AGENT: You said yes, it was a
3 little unusual. Can you tell me what was unusual?

4 ([REDACTED]): It was a little unusual
5 because she had been working -- she was notified in
6 February that her position was eliminated. I was
7 aware of what ([REDACTED]) had communicated --

8 (Off the record.)

9 SPECIAL AGENT: We switched over to Side
10 B, and you were looking at the last page of this draft
11 separation package. Looking at this last page, does
12 anything on there give an indication as to when it was
13 generated?

14 ([REDACTED]) No, I did not put a date.
15 Apparently, I did not put a date on it.

16 SPECIAL AGENT: Okay. That's all right.
17 I don't know if there's any of the calculations that
18 would show when it was prepared. I don't know if they
19 mean anything in that regard. Do they?

20 ([REDACTED]) No. I always pull -- it's a
21 Lotus Notes screen that has all the employee
22 information, their hourly rate, their years of service
23 to help me calculate this payment type of thing, so we
24 should have a copy of that, as well. This is my typed
25 up -- this was for [REDACTED] information around what the

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1 spreadsheet - what it really meant, and how I got
2 those figures.

3 SPECIAL AGENT: All right. Okay. So
4 after you drafted this draft package, did you present
5 it to [REDACTED] or [REDACTED] What would have
6 happened next? Tell me what happened next.

7 [REDACTED] Okay. I drafted it up and
8 gave it to [REDACTED] And I believe he took it up to
9 [REDACTED] and it had a note on it, "Based on your
10 request, here's the" -- I don't know if he had
11 discussions with him or not, but this is our normal
12 package for any individuals that their positions had
13 been eliminated.

14 SPECIAL AGENT: Right. But you gave that
15 to [REDACTED] and I'm going to show you this document here.
16 It's a document dated -- on the top it has March 3rd,
17 2003. Do you see that?

18 [REDACTED] Yes.

19 SPECIAL AGENT: And it has the name Kim H.
20 Ritigliano. And it's an acknowledgement of receiving
21 a cover letter and separation agreement. Do you see
22 that there?

23 [REDACTED] Yes.

24 SPECIAL AGENT: The signature looks like
25 Kim Harvey's signature. Does that look like it to

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1 you?

2 ([REDACTED]) Yes.

3 SPECIAL AGENT: Okay. And the date is
4 2/26/03. Would she have signed this in your presence?

5 ([REDACTED]) Yes.

6 SPECIAL AGENT: Okay. And where did that
7 occur, and how did that occur? Maybe you can go into
8 that meeting with Kim, please.

9 ([REDACTED]) Okay. That meeting with Kim
10 occurred over in the Processing Center, and --

11 SPECIAL AGENT: Do you remember where?

12 ([REDACTED]) It was either Room 1 or Room
13 3.

14 SPECIAL AGENT: Okay.

15 ([REDACTED]) It's in the front of the
16 Processing Center building.

17 SPECIAL AGENT: How did you come to meet
18 there? Did you call her and ask her to meet you
19 there? How did that happen?

20 ([REDACTED]) The morning that Kim was
21 notified that her position was eliminated by [REDACTED] my
22 discussions that morning with [REDACTED] he was going to
23 have her -- after he informed her that her position
24 was eliminated, she was to come down to my office. I
25 waited an hour. I did not see her, so I called [REDACTED]

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1 (b)(7)(C) and (b)(7)(C) told me that Kim
2 had left almost a half hour, 45 minutes ago. And I
3 said well, she's not come down here, so I --

4 SPECIAL AGENT: Here meaning to HR?

5 (b)(7)(C) Right.

6 SPECIAL AGENT: Okay.

7 (b)(7)(C) Come to my office down here,
8 and so I either called Kim on the phone, or I beeped
9 her, or something or another, but I did get in touch
10 with Kim.

11 SPECIAL AGENT: Okay.

12 (b)(7)(C) And she did not want to come
13 over to my office. She did not want me in her office,
14 and the Processing Center was, I guess, a mutually
15 agreed upon spot.

16 SPECIAL AGENT: Did she say why she didn't
17 want to come over here?

18 (b)(7)(C) She was just uncomfortable
19 about coming down here.

20 SPECIAL AGENT: Okay. All right. So you
21 meet in the Processing Center. Tell me what happens.

22 (b)(7)(C) I met with her, and I went
23 over the separation agreement, and she also received
24 a copy of the severance, the separation allowance.
25 That's what that's called.

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1 SPECIAL AGENT: Okay.

2 () Separation allowance, company
3 policy, separation allowance. That's the one and a
4 half weeks for every year of service.

5 SPECIAL AGENT: Who would have done that
6 calculation?

7 () I did that calculation.

8 SPECIAL AGENT: Would that have been done,
9 when?

10 () It was done previous, but
11 it's not communicated to the individual, what the
12 payout would be at this meeting.

13 SPECIAL AGENT: Jeff, I'd like to get the
14 origination date of that document too. I want to get
15 all that kind of stuff to show when it was done,
16 frankly.

17 () Okay.

18 SPECIAL AGENT: Did you say you retained
19 that too in your computer?

20 () Yes, this is still there. I
21 mean, that should still be there.

22 SPECIAL AGENT: Another Excel sheet?

23 () Yes.

24 SPECIAL AGENT: Okay. If it does exist,
25 I'd like to have it. I guess I should put it down.

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1 Do you need a couple of minutes?

2 ([REDACTED]) Yes.

3 SPECIAL AGENT: Okay. You pointed to the
4 last page of the draft separation agreement document
5 that we looked at earlier. That's the document you're
6 talking about.

7 ([REDACTED]) Yes. The separation
8 allowance, that's the calculation. I believe Kim, at
9 that time, had five years with PSE&G.

10 SPECIAL AGENT: Okay.

11 ([REDACTED]) But I did not inform her on
12 that meeting of February the 26th what her money was
13 going to be.

14 SPECIAL AGENT: Okay.

15 ([REDACTED]) The separation allowance is
16 one and a half weeks, and then if she signs a
17 confidentiality statement, then I go into the
18 separation agreement.

19 SPECIAL AGENT:- Did she sign the
20 confidentiality document at that meeting in the
21 Processing building?

22 ([REDACTED]) Yes. That's this document
23 here.

24 SPECIAL AGENT: Okay. All right. Then
25 did you go into discussions with her surrounding

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1 payments owed to her when she left?

2 (REDACTED): Then I went into this
3 document, the separation agreement.

4 SPECIAL AGENT: Okay.

5 (REDACTED): Talked about each one of
6 these paragraphs, and that she -- if she wanted to,
7 she would sign the document, and for her signature
8 they would give her four weeks additional pay, as well
9 as three months of COBRA benefits, and three months of
10 outplacement services.

11 SPECIAL AGENT: And did she sign that
12 document that day, the separation agreement?

13 (REDACTED): No. I had advised her not to
14 sign it today, that it needed to be reviewed. She had
15 the option to review it with her attorney, financial
16 advisor, and her spouse before signing it. However,
17 if she was going to sign the document, I would need
18 this back in my office prior to April 16th.

19 SPECIAL AGENT: Okay. So she had plenty
20 of time to do that.

21 (REDACTED): Yes.

22 SPECIAL AGENT: Can you explain to me why
23 this "Acknowledgement of Receipt of Cover Letter and
24 Separation Agreement" is signed and dated 2/26/03, yet
25 the typed date at the top is March 3, '03? Do you

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1 have an explanation for that?

2 [REDACTED] I remember I received another
3 voicemail from [REDACTED] to say get the package ready
4 for Kim. [REDACTED] wants to initiate this package;
5 however, even though we're going to meeting with her
6 today, we're going to still use the March 3rd date.
7 I don't know what day of the week 2/26 was, but I
8 recall [REDACTED] saying that he had a one-on-one meeting
9 that day with Kim, and that's when he was going to
10 give it to her.

11 SPECIAL AGENT: Okay. At this meeting
12 with Kim in the Processing building when she signed
13 this document, at any point during that meeting did
14 she allege to you that her position had been
15 eliminated because she raised any type of safety
16 concerns at the plant? Did she make that allegation
17 during that meeting?

18 [REDACTED] No.

19 SPECIAL AGENT: Okay. Let's go back to
20 talk about a discussion you had with [REDACTED]
21 Did you meet with [REDACTED] before he told Kim Harvey that
22 he was going to eliminate her position?

23 [REDACTED] Yes.

24 SPECIAL AGENT: Okay. And did that
25 meeting that you had with him occur on the same day

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1 that he was going to tell Kim that her position was
2 eliminated?

3 () Yes.

4 SPECIAL AGENT: How did you come to have
5 that meeting with ()

6 () That voicemail I referred to
7 from () () had asked me to prepare the
8 package and get it up to () prior to 8:00 or 9:00
9 time frame, something like that.

10 SPECIAL AGENT: In the morning?

11 (): In the morning, because he
12 was planning to meet with Kim, whether it be 9:00 or
13 10:00, I was not sure, so I prepared the information,
14 took it all up there, and briefly sat with me and went
15 through the package. And we continued to talk in
16 reference to the next steps. I believe () provided
17 her with this letter.

18 SPECIAL AGENT: The March 3rd letter?

19 () The March 3rd letter. And
20 then she was to come down to my office, so then we
21 could get into the separation agreement and the
22 confidentiality statement.

23 SPECIAL AGENT: Okay.

24 () That's why it was important
25 that I met with her, so I could go over this

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1 additional piece.

2 SPECIAL AGENT: Okay. During this
3 discussion with [REDACTED] before he met -- I guess the
4 discussion, the meeting with [REDACTED] was on the 26th of
5 February, 2003.

6 [REDACTED]: Correct.

7 SPECIAL AGENT: During the meeting, did
8 [REDACTED] tell you why he had decided to eliminate Kim's
9 position?

10 [REDACTED]: No.

11 SPECIAL AGENT: Did he say it was his
12 decision to eliminate the position? Did he tell you
13 that during that meeting?

14 [REDACTED]: No.

15 SPECIAL AGENT: Okay. All right. It's
16 3:24. We're going to take a short break.

17 (Off the record.)

18 SPECIAL AGENT: It's 3:25. We're back
19 after a break. Is there a personnel procedure which
20 is supposed to be followed when someone's position is
21 eliminated, certain steps that are supposed to be
22 followed per procedure? I understand there's a
23 personnel processing procedure that exists.

24 [REDACTED]: Like an outprocessing
25 program. Is that --

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1 SPECIAL AGENT: Well, let me -- it's been
2 alleged that personnel processing procedures were not
3 followed regarding Kim Harvey's elimination, her
4 position being eliminated. Is that true? Do you know
5 if that's true or not?

6 [REDACTED] I don't know.

7 SPECIAL AGENT: And maybe we could talk a
8 little bit about the personnel processing procedures,
9 what they are. Did you know what they are? I think
10 you would.

11 [REDACTED] Like I said before, anything
12 that I'm aware of is that change management process
13 that we had charged all the other managers to prepare,
14 but I don't know if that was done for Kim's position.

15 SPECIAL AGENT: All right. Do you think
16 you followed all company procedures in processing what
17 you had to do regarding the elimination of Kim's
18 position? In presenting her with that information, do
19 you think you followed all the procedures and policies
20 regarding that?

21 [REDACTED] Yes.

22 SPECIAL AGENT: Okay. Could there have
23 been any you missed?

24 [REDACTED] Not that I'm aware of any.

25 SPECIAL AGENT: All right. So you meet

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1 with Kim on the 26th of February, 2003. All right.
2 She's told that day by [REDACTED] that her position
3 is being eliminated. At some point, a decision was
4 made where her last day on the site would be
5 accelerated. Right? I'm using that term -
6 accelerated meaning moved up. According to you, the
7 March 3rd, 2003 letter to Kim that she had 45 days
8 active on the table, up to April 16th, 2003. The
9 decision was made at some point where she wouldn't be
10 working here at the site on that date. She would be
11 gone sooner than that. When did you first learn that
12 that was going to occur?

13 [REDACTED] Okay.

14 SPECIAL AGENT: Her last date here is
15 March 28th, 2003, just give you some reference.

16 [REDACTED] Okay.

17 SPECIAL AGENT: At some point, did you
18 learn that her last day on the site was going to be
19 moved up from the April 16th date?

20 [REDACTED] Yes.

21 SPECIAL AGENT: Okay. Can you tell me
22 when you learned that?

23 [REDACTED] I learned that on or about
24 March 24th.

25 SPECIAL AGENT: What makes you think you

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1 learned that on that date?

2 [REDACTED] Because there was a telephone
3 conversation with Kim. [REDACTED] advised her that
4 her last day was going to be on the 28th, and that I
5 would be conducting the exit interview.

6 SPECIAL AGENT: Were you present when [REDACTED]
7 [REDACTED] called Kim and told her that? Where you in
8 [REDACTED] office or in [REDACTED] presence when he placed
9 that call to Kim?

10 [REDACTED] I've seen an email notice or
11 a calendar notice where I was to be a part of that
12 meeting, but I don't remember that meeting, me being
13 there.

14 SPECIAL AGENT: But you were given the
15 assignment -- or I'll ask you, were you given the
16 assignment by [REDACTED] to have the exit with Kim on
17 March 28th?

18 [REDACTED]: Yes.

19 SPECIAL AGENT: Okay. All right. Did you
20 have that meeting with Kim on the 28th?

21 [REDACTED]: Yes.

22 SPECIAL AGENT: All right. Okay. Step
23 back for just a minute. Kim signs the acknowledgement
24 on February 26th, 2003. In between then and March
25 24th, did you have opportunities to send Kim notices

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1 of other jobs that were available to her?

2 ([REDACTED]) Yes.

3 SPECIAL AGENT: Okay. I have one here I'm
4 going to show you. It's called HR General as a Client
5 Consultant. Would this have been one of the positions
6 that you would have forwarded to Kim for her
7 consideration?

8 ([REDACTED]) Yes.

9 SPECIAL AGENT: Okay.

10 ([REDACTED]) This position was within our
11 own group, within the HR group. And it was also a
12 call. I also provided another list to Kim in
13 reference to the other open positions, approved open
14 positions within nuclear.

15 SPECIAL AGENT: Was this HR General Client
16 Consultant an approved position?

17 ([REDACTED]) Yes.

18 SPECIAL AGENT: Okay. And why was -- at
19 the bottom it shows a date, 3/3/03. Do you see that?

20 ([REDACTED]) Yes.

21 SPECIAL AGENT: Do you think you sent that
22 to her on or about that date?

23 ([REDACTED]) Yes.

24 SPECIAL AGENT: Why was that position
25 forwarded to Kim for her consideration?

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1 [REDACTED] It was -- [REDACTED] had
2 just recently left our organization, and she used to
3 be a client consultant. She was in a staffing source
4 or type of title, and it was decided at that time that
5 we needed another client consultant, to take on a
6 client consultant role, so I believe [REDACTED] prepared the
7 job description and had it approved up in Newark by
8 [REDACTED] and it was an approved open position, so we
9 provided Kim the opportunity to see if she was
10 interested in it or not.

11 SPECIAL AGENT: And others, was it
12 provided to others too, or was it just provided to
13 her?

14 [REDACTED] It was just provided to Kim
15 because it had not yet -- we had not put it out on our
16 posting.

17 SPECIAL AGENT: Why was it provided to
18 just Kim at that point?

19 [REDACTED] Based off of her credentials,
20 her education, HR - she previously had held an HR
21 position, if she wanted to --

22 SPECIAL AGENT: Was that position
23 eventually filled by somebody?

24 [REDACTED] No.

25 SPECIAL AGENT: Why not? Do you know why

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1 not?

2 ([REDACTED]) No, I don't know why not.

3 SPECIAL AGENT: All right. And how did
4 you forward this to Kim Harvey?

5 ([REDACTED]) I'm not sure if it was hard
6 copy or if it was electronic.

7 SPECIAL AGENT: Okay. Let me ask you
8 this, did ([REDACTED]) know you were forwarding that job
9 description to Kim Harvey? Do you know if he knew
10 that?

11 ([REDACTED]) I would think he would know
12 that since he was the ([REDACTED]) of our department.

13 SPECIAL AGENT: Okay. And did you have
14 any discussions with Kim surrounding her interest in
15 applying for this position?

16 ([REDACTED]) Yes.

17 SPECIAL AGENT: Okay. Go ahead and share
18 those with me.

19 ([REDACTED]) She pretty much -- again I
20 don't know if it was voicemail or if it was live, that
21 she was not interested in the position.

22 SPECIAL AGENT: Okay. When do you think
23 you heard from her that she was not interested in that
24 position?

25 ([REDACTED]) I would say within a week of

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1 her receiving the information.

2 SPECIAL AGENT: Okay. Were there other
3 position descriptions on open jobs also forwarded to
4 Kim Harvey?

5 (REDACTED) Yes.

6 SPECIAL AGENT: I have one here dated
7 March 13, '03. It's an email from you to Kim. Do you
8 see that?

9 (REDACTED) Yes.

10 SPECIAL AGENT: Is that one of the other
11 positions that would have been forwarded to her?

12 (REDACTED) That's one of them, yes.

13 SPECIAL AGENT: That one sounds like a
14 little different job than the earlier one. This would
15 have been a technical clerk position, a lot lower than
16 the position she had worked at under (REDACTED) 7C

17 (REDACTED): Correct.

18 SPECIAL AGENT: Did Kim respond to you
19 regarding that job opening?

20 (REDACTED) I believe she did.

21 SPECIAL AGENT: And do you recall --

22 (REDACTED) She was not interested in
23 that position.

24 SPECIAL AGENT: Are you aware of any other
25 open position announcements being forwarded to Kim

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1 Harvey?

2 [REDACTED]: Yes.

3 SPECIAL AGENT: Okay. Do you remember how
4 many other ones? Would the training manager's job
5 have been one of them?

6 [REDACTED]: I don't believe the training
7 manager job was one of them. That position at the
8 time was -- it was vacant but it wasn't -- they were
9 like putting it on hold. It was an open position but
10 they were not actively recruiting for the position.

11 SPECIAL AGENT: For any of the positions
12 that were forwarded to Kim for her consideration, did
13 she apply for any of those?

14 [REDACTED]: Not that I recall.

15 SPECIAL AGENT: How many other positions
16 do you think were forwarded to her for her
17 consideration during this time period? I only have
18 the two. I have this one and the HR consultant one.
19 I haven't seen any others.

20 [REDACTED]: I was going to say I believe
21 I forwarded to her probably on a weekly basis the open
22 positions that were approved.

23 SPECIAL AGENT: Would they be forwarded to
24 everybody who was out of a job at that point? Would
25 they be forwarded to everyone?

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1 () No.

2 SPECIAL AGENT: Okay.

3 () Well, let me think. I have
4 other folks that were out. Normal process is
5 positions had been eliminated, and notified, and
6 whether there's on-site or off-site, we would get the
7 approved open positions to them to look at. And that
8 they would have -- we would do everything we could to
9 get out noticing as possible, so then we could make a
10 call to the hiring manager to tell these individuals
11 that they were on a short time frame here, and that we
12 needed -- that they were going to interview their
13 interested --

14 SPECIAL AGENT: Okay. Let me ask you this
15 question. For any of the positions that were
16 forwarded to Kim for her consideration, did you hear
17 any manager here at Salem Hope Creek comment that she
18 had no chance of being hired for any of those
19 particular positions?

20 () Oh, no.

21 SPECIAL AGENT: That they didn't want her
22 here for any particular reason.

23 () No.

24 SPECIAL AGENT: It's 3:30 and we're going
25 to take a short break.

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(Off the record.)

SPECIAL AGENT: Okay. It's 3:40 in the afternoon. And, Jeff, you brought something up. Exhibit 37 in the documents provided to my office - describe the positions that were forwarded to Kim by the U.S. Mail by you, [REDACTED]

[REDACTED] Yes.

SPECIAL AGENT: After Kim would have left the site here?

[REDACTED] Not necessarily from me, but from my office.

SPECIAL AGENT: Okay.

[REDACTED] printed them all off, and we sent them through certified mail to her home with a cover sheet on it.

SPECIAL AGENT: Okay. How long would that have occurred for? I mean, how long does your company do that for people whose positions are eliminated?

[REDACTED] If the individual is off-site, we would -- every week, we would provide a package every week.

SPECIAL AGENT: Okay. For how long though would that continue?

[REDACTED] Until the individual's last date worked and on the active payroll.

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1 SPECIAL AGENT: Okay. So Kim Harvey's
2 last date worked and on the active payroll would have
3 been April 16th.

4 [REDACTED] Correct.

5 SPECIAL AGENT: So after that date, you
6 would not be mailing that information any more?

7 [REDACTED] That's correct.

8 SPECIAL AGENT: Okay. For any of the
9 mailings that you sent to Kim, did she call into you
10 or your department inquiring further about any of
11 those positions?

12 [REDACTED] No.

13 SPECIAL AGENT: Do you know if she applied
14 for any of those positions that were forwarded to her
15 by U.S. Mail?

16 [REDACTED]: Not to my knowledge.

17 SPECIAL AGENT: All right. You know what,
18 Jeff. I'm not going to finish before 4:00. I don't
19 think I have a heck of a lot more to go over with you,
20 but I'd rather just pick up tomorrow if we can. I
21 don't want to start a line of questioning and then
22 have to suspend it. I just don't think I'm going to
23 finish before 4:00.

24 [REDACTED] Okay.

25 SPECIAL AGENT: And I'd rather not -- I

1 don't have a lot more to do, but I would rather just
2 stop at this point and we'll continue tomorrow.

3 ([REDACTED]) Okay.

4 SPECIAL AGENT: Is that all right?

5 ([REDACTED]) That's fine.

6 SPECIAL AGENT: Okay. We can talk off the
7 record about that.

8 ([REDACTED]) Okay.

9 SPECIAL AGENT: It's 3:42, and because
10 [REDACTED] has to leave here at 4:00, I'm going to stop at
11 this point and we'll continue tomorrow, and we'll
12 finish tomorrow.

13 ([REDACTED]) Okay.

14 SPECIAL AGENT: Okay. All right. It's
15 3:42. This interview is going to be continued
16 tomorrow.

17 (Off the record.))
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