

1 having been duly and legally sworn, answered
2 questions on her oath as follows, to-wit:

3 BY MR. HARPER: May I proceed, Your Honor?

4 BY THE COURT: Yes, sir.

5 DIRECT EXAMINATION

6 BY MR. HARPER:

7 Q. Would you state your name, please, ma'am.

8 A. Amanda Goodwin.

9 Q. And, Ms. Goodwin, where do you live?

10 A. I live at 22 Hibiscus Lane.

11 Q. That's here in Natchez?

12 A. About seven miles north of town.

13 Q. And at this time, Ms. Goodwin, where are you
14 employed?

15 A. I am a teacher at Cathedral Elementary School.

16 Q. And are you -- would you -- what type of
17 teacher?

18 A. I'm a special education teacher.

19 Q. What training have you had as far as your
20 educational background?

21 A. I have four years of college, bachelor's
22 degree.

23 Q. And that's in special education?

24 A. Special education. Yes.

25 Q. And how long have you worked at Cathedral?

26 A. This is my first year. I've only been there
27 since August.

28 Q. And prior to that, where do you work?

29 A. Teaching or --

1 Q. No. Your previous employment.

2 A. My previous employment was with Grace UMC child
3 development center. I was their child care director.

4 Q. You were their child care director?

5 A. Yes.

6 Q. How long did you serve in that capacity?

7 A. About a year.

8 Q. If I am correct, you actually were the one that
9 started that child care --

10 A. Right.

11 Q. -- development center there?

12 A. Yes.

13 Q. Correct me if I am wrong, Ms. Goodwin, you had
14 certain qualifications that you had to meet to serve in
15 that capacity; is that right?

16 A. Yes.

17 Q. Would you tell us a little bit about that,
18 please, ma'am.

19 A. In order to serve as a child care director, you
20 must have either a four-year degree, which I have, in
21 elementary education, special education, child
22 development, something along those lines. There are other
23 ways to qualify.

24 Q. That's the way that you qualified?

25 A. That's the way that I qualified. Yes.

26 Q. Do you have to be certified before you can serve
27 in that position?

28 A. Certified?

29 Q. Does the State have to approve you or give you

1 approval to serve in that capacity before --

2 A. Well, I had to go through background checks,
3 fingerprints, but my degree qualified me for that.

4 Q. Okay. And how long -- I may have asked you
5 this. How long did you serve as director of child care
6 development?

7 A. About a year.

8 Q. Okay. And I'll ask you that in that capacity
9 did you have occasion to become acquainted by an infant
10 child by the name of Chloe Madison Britt?

11 A. Yes.

12 Q. Would you tell us about that, please, ma'am.

13 A. Maddie was enrolled in our child care center on
14 October the 1st of 2001. She was approximately four weeks
15 old.

16 Q. You refer to her as Maddie. Is that what y'all
17 called her?

18 A. That's what we called her.

19 Q. And that is one and the same as Chloe Madison
20 Britt?

21 A. Yes, it is.

22 Q. And you say she was enrolled. Tell us how that
23 -- how do y'all -- do y'all have somebody that's enrolled
24 for five days a week or less than five days, or how is
25 that --

26 A. She was enrolled full time. She attended five
27 days a week.

28 Q. What hours did the children usually stay there
29 when --

1 A. We opened at seven a.m. and closed at six p.m.

2 Q. What was her -- was she there pretty much all
3 the time?

4 A. Yes. She'd usually come in around nine or ten
5 o'clock, and she was usually there until 5:30, 6:00.

6 Q. That was -- she was consistently there during
7 that period of time from October 1?

8 A. Yes. Maddie was hardly ever absent.

9 Q. I'll ask you, Ms. Goodwin, was she, in fact,
10 there on February the 21st? I think that was a Thursday
11 of this year?

12 A. Yes. She was. She was signed in at 10:30 a.m.
13 by her mother and signed out at 5:30 p.m. also by her
14 mother.

15 Q. By her mother?

16 A. Yes.

17 Q. Did you have occasion to see her on that
18 particular day?

19 A. I did. I was not working in the infant room
20 that day, but I was in and out of the room, and I did see
21 her. One occasion that sticks in my mind, I walked into
22 the room to talk to one of the care givers, and I heard a
23 cough, and I turned to my left, and Maddie was sitting in
24 the swing. She was wearing -- (pause)
25 (Witness begins crying.)

26 Q. Take your time.

27 A. She was wearing purple, and I commented to the
28 care giver about her cough.

29 BY MR. HARPER: May I approach, Your Honor?

1 BY THE COURT: Yes, sir.

2 BY MR. HARPER:

3 Q. Take your time.

4 (Mr. Harper hands the witness tissue.)

5 Q. So you recall that particular incident on that
6 day?

7 A. Right. She --

8 Q. Go ahead. I am sorry.

9 A. She -- like I said, she had a cough, but she
10 didn't appear to be in any pain or injured in any way.
11 She was --

12 Q. Had you had a chance to observe her? Do you
13 change diapers on some of the kids down there as the
14 director?

15 A. Oh, yes.

16 Q. Had you done that with her on occasion?

17 A. Yes. Several times.

18 Q. Did you ever notice anything, any injuries or
19 anything wrong with her?

20 BY MR. SERMOS: Objection, Your Honor. He's
21 leading the witness.

22 BY THE COURT: Let's don't lead the witness, Mr.
23 Harper.

24 BY MR. HARPER: I apologize, Your Honor.

25 BY THE COURT: Let's go ahead and proceed.

26 BY MR. HARPER:

27 Q. What, if anything, did you ever observe about
28 her appearance prior to February 21 of 2002?

29 A. Maddie was a very clean, well nourished child.

1 She never had any bruises or marks on her of any kind. My
2 staff was required to do a health check on the children
3 every morning, and they were to document any bruises, any
4 marks, and report immediately to me anything suspicious at
5 all.

6 Q. Did you ever have any reports of --

7 A. Nothing.

8 Q. -- involving her?

9 A. Never.

10 Q. Now, when you say they were required to, is that
11 by law or is that just a requirement that y'all had? What
12 was --

13 A. They were required to document it. I required
14 them to report it to me.

15 Q. And no reports had ever been made prior to
16 that -- was a report made on that date, February 21st,
17 about any --

18 A. No.

19 Q. -- injuries to her?

20 A. No. Never on Maddie.

21 Q. And you indicated that you do recall observing
22 her that one time and possibly other times. Did you
23 observe anything about her physical appearance that day
24 that would indicate to you what, if anything, had been
25 done to her prior to that?

26 A. Nothing.

27 Q. Okay. And I will ask you. Did you change her
28 diapers to your recollection on February the 21st?

29 A. I did not on February the 21st.

1 Q. Did members of your staff do that during the
2 course of that day?

3 A. Oh, yes. I'm sure they changed several times
4 that day.

5 Q. I believe she was about six months old; is that
6 right?

7 A. Yes.

8 Q. It would be pretty common practice with a six
9 month old --

10 BY MR. SERMOS: Objection, Your Honor. Leading
11 the witness.

12 BY MR. HARPER: I apologize, Your Honor. I'm
13 just trying --

14 BY THE COURT: That will be sustained. Rephrase
15 your question, Mr. Harper.

16 BY MR. HARPER:

17 Q. Would it have been a requirement that your staff
18 would change her diapers several times during the course
19 of a day when she was there?

20 A. Yes. And they were to document each time that
21 she was changed, and they were to tell on the
22 documentation for the parent if she was wet or had a bowel
23 movement.

24 Q. Okay.

25 A. We had --

26 Q. I'm sorry.

27 A. We had forms. Just Xerox forms, and the care
28 givers would circle the time and write out beside it a "W"
29 for wet or "B" for bowel movement. So she was changed

1 many times that day.

2 Q. Did they, in fact, do that on February 21st of
3 2002?

4 A. Yes.

5 Q. What, if anything, on that report on that date
6 was remarkable, if anything?

7 A. Nothing that I know of. That report was then
8 given to her mother when she was picked up.

9 Q. Okay. But nobody made any reports to you?

10 A. No, they did not.

11 Q. And I believe you said she was picked up that
12 day at approximately what time?

13 A. Five-thirty by her mother.

14 Q. Okay.

15 BY MR. HARPER: The Court will indulge me just
16 one moment, Your Honor.

17 BY THE COURT: Yes.

18 (Mr. Harper and Mr. Rosenblatt confer.)

19 BY MR. HARPER: Please the Court, Your Honor.

20 May I approach the witness?

21 BY THE COURT: Certainly.

22 BY MR. HARPER:

23 Q. Ms. Goodwin, I am going to hand you an exhibit
24 that's been marked as State's Exhibit 2, and ask if you'll
25 look at that and tell me whether or not you can identify
26 who's in the picture?

27 A. That's Maddie.

28 BY MR. HARPER: That's all I have, Your Honor.

29 BY THE COURT: All right. Any

1 cross-examination?

2 CROSS-EXAMINATION

3 BY MR. SERMOS:

4 Q. Do you recall talking to Deputy Darion Smith?

5 A. I do.

6 Q. And that would have been back on the 22nd of
7 February of this year?

8 A. Correct.

9 Q. Okay. And do you remember telling him that you
10 had -- that no bruises or signs of abuse were ever
11 observed on Maddie?

12 A. Yes. That's correct.

13 Q. Chloe as we call her. Okay. And you also told
14 him that Rebecca Britt -- that's the mother, right?

15 A. Correct.

16 Q. That Rebecca Britt's mother, Lillian Watson,
17 paid the bills at the day care; is that correct?

18 A. That is correct.

19 Q. And are you a licensed social worker?

20 A. No.

21 Q. But you were at a state licensed day care
22 center, correct?

23 A. Correct.

24 Q. That means you all are mandated reporters for
25 any allegations of child abuse or any signs of child
26 abuse; is that correct?

27 A. That is correct.

28 Q. So you were or your staff would have a duty to
29 report regardless of your own internal rules; isn't that

1 right?

2 A. Definitely. Yes.

3 Q. And that would be according to the Mississippi
4 Code, right?

5 A. Right.

6 Q. From what you observed of Maddie, she was always
7 clean, wasn't she?

8 A. Yes.

9 Q. Well nourished?

10 A. Yes.

11 Q. You had never seen any signs of abuse on her?

12 A. No.

13 BY MR. SERMOS: No further questions, Your
14 Honor.

15 BY THE COURT: Any redirect?

16 BY MR. HARPER: We have no further questions of
17 this witness, Your Honor. We'd ask that she be
18 excused at this time, I think, from our subpoena. I
19 don't know whether the defense may have her under
20 subpoena, too.

21 BY THE COURT: Is there any reason to keep this
22 witness under subpoena?

23 BY MR. SERMOS: No, Your Honor. We would excuse
24 her also.

25 BY THE COURT: You may step down, and you will
26 be excused and released from your subpoena.

27 BY THE WITNESS: Thank you.

28 (Witness steps down.)

29 BY THE COURT: Who does the State call as your