Depos	THE PARTY	11. 0	AND 1 (VOL. I) 1/31/02 Sheet
STATE OF WISCONS		1	VIDEOTAPE DEPOSITION OF BARBARA R. CANDY,
DEPARTMENT OF WORKFORD EQUAL RIGHTS D		2	called as a witness, taken at the instance of the
MILWAUKEE CO	UNTY	3	Complainant, under the provisions of Chapter 885 of
	:=====================================	4	the Wisconsin Statutes, pursuant to notice and
MARILYN FIGUEROA.	Ś	5	subpoena duces tecum, before Taunia Northouse, a
Complainant,)))	6	Registered Diplomate Reporter and Notary Public in
-vs-) ERD Case No.) CR200003454	7	and for the State of Wisconsin, at the offices of
CITY OF MILWAUKEE,) }	8	Murphy, Gillick, Wicht & Prachthauser, Attorneys at
<u> </u>) }	9	Law, 330 East Kilbourn Avenue. City of Milwaukee,
Respondent.) ·)	10	County of Milwaukee, and State of Wisconsin, on the
*********	* = = * = = = = =	11	31st day of January 2002, commencing at 11:10 in the
		12	forenoon.
Videotape Depo	sition of:	13	· · · · · · · · · · · · · · · · · · ·
BARBARA R. C.	ANDY	14	APPEADANCEC
Milwaukee, Wi January 31,		15	APPEARANCES
		16	VICTOR M. ARELLANO, Attorney,
		17	for LAWTON & CATES, S.C., Attorneys at Law, 10 East Doty Street, Madison, Wisconsin,
Reporter: Taunia Norti	house, RDR, CRR	18	appearing on behalf of the Complainant.
		19	BRUCE D. SCHRIMPF and LEDNARD A. TOKUS, Assistant City Attorneys, for CITY OF HILMAUKEE. OFFICE OF
		20	Milwaukee, Wisconsin, appearing on behalf
•		1	of the Respondent.
		21	JOHN D. FINERTY, Attorney, for FRIEBERT, FINERTY & ST. JOHN, S.C., Attorneys
		22	at Law, 330 East Kilbourn Avenue, Milwaukee, Wisconsin, appearing on behalf of the witness.
		23	Also present: Marilyn Figueroa and Cheri Garcia
	* ************************************	24	Emily Aurit (videographer)
٠		25	
1 INDEX		+	3
2 WITNESS	Page (c)	1	BARBARA R. CANDY,
3 BARBARA R. CANDY	Page (s)	2	called as a witness, being first duly sworn,
4 Examination by Mr. Arelland		3	testified on oath as follows:
5	4	4	
6		5	MR. ARELLANO: Before we start, on
	T S	6	the record, counsel, who's going to be leading
		(here?
	<u>Identified</u>	8	MR. SCHRIMPF: I will.
		9	MR. ARELLANO: Thank you. And your
	rs 34	10	name?
11		111	MR. SCHRIMPF: Bruce Schrimpf.
12		12	MR. ARELLANO: Thank you. Go
13		13	ahead. I apologize.
14 (Original exhibits returned by t	he reporter to	14	
15 Attorney Finerty; copies attache transcript and provided to couns	d to the original el)	15	EXAMINATION
16 		16	By Mr. Arellano:
17		17	Q Good morning, ma'am.
18 (Original transcript filed with	Attorney Arellano)	18	A Good morning.
19	, ,	19	Q As you heard, my name is Victor Arellano, and I
20		20	represent Ms. Marilyn Figueroa. I will be asking
21		21	you questions this morning. Obviously I expect you
22		22	to take your time so that you can first understand
23		23	my question and, secondly, so that you can give me
24		24	an answer.
25		25	For some reason you cannot understand my
2			4
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Cas		ompress Deposition of British		_	
1		question, feel free to let me know. You are not	1		Okay.
2		going to hurt my feelings. I don't have any, okay?	2	Q	When I am done. He can ask you questions for
3		I can rephrase the question. I can modify it. I	3		clarification. He can introduce documents if that's
4		can withdraw it and ask you a new question. The one	4		what he wishes to do.
5		thing I do want to make sure that we do is that we	5	Á	Okay.
6		understand each other so that the record is clear.	6	Q	He represents the interest of the City of Milwaukee.
7		I would hate to hear you say at the day of the trial	7	•	But obviously your attorney, unless there is some
		I didn't quite understand your question. I'll stay	8		privileged matter that he wants to protect, he may
8		here until you feel comfortable. Is that okay?	9		want to clarify something, but he is not going to be
9		· ·	10		participating in these proceedings, with all due
10	A	Yes.	11		respect.
11	Q	In talking I'm sure with your very able counsel you	12		MR. ARELLANO: Is that right,
12		have received some instructions about what to expect	13		counsel?
13		in a deposition. It's basically a question and	14		MR. FINERTY: No. 1 made my
14		answer type thing. Unless your attorney for some	15		appearance. I'm in attendance only.
15		limited but very important purpose tells you not to			MR. ARELLANO: Thank you, judge.
16		answer, I still want you to provide me with an	16		• • •
17		answer. The person who is going to be objecting in	17		See, you look like a judge. Impressive.
18		these particular proceedings, unless your counsel	18		MR. FINERTY: That's close enough.
19		tells you not to answer, will be Mr. Schrimpf who is	19		MR. ARELLANO: And I hope I'm not
20		present here representing the City of Milwaukee. If	20		really overwhelming you with my presence. I
21		for some reason you need to take a break, not for	21		always get a little spot in here.
22		the purpose of trying to determine how to answer a	22	Q	Okay. Let me ask you to give us your full name and
23		question but simply because you feel tired or you	23		address for the record.
24		need	24		It's Barbara Ruth Candy.
25	Α	Because I chain smoke, yeah.	25	Q	And what's your address?
		5	<u></u>		
1	0	That's fine, that's fine. You can take a break.	1	Α	4071 Richland Court, Shorewood, 53211.
2	. ~	Just let me know.	2	Q	And let me just briefly ask you to summarize your
3		Are you under any type of medication that may	3		education, your academic accomplishments, if you
4		require you to take a break?	4		will.
5	Α	No.	5	Α	I have a bachelor's degree in political science from
6		Or that may inhibit or not allow you to recollect,	6		McAllister College.
7	V	remember things?	7	Ç	Anything else?
8	Δ	No.	8		No.
9	<u> </u>	Other than the normal course of nature? Okay, all	9	C) When did you graduate from this college?
10	Q	right. My last statement I want to make before I	10		1974.
11		start asking you questions is that I expect you to	11	C	Good year. You graduated with a major in political
12		tell me what you know.	12		science?
13	Δ	Uh-huh.	13	A	Uh-huh.
14	Λ Λ	And if you don't know, just simply tell me I don't	14) Did you take any other sub
15	Ų	recall, I don't know the answer. But this is	15		A Anthropology.
		Tetall, I don't know the answer. But this is	16		Anthropology. Human anthropology I suspect?
16		obstrought a midicial proceeding where you are orying			
17		obviously a judicial proceeding where you are giving	17	F	\ Uh-huh.
17		testimony under oath. I don't think I ever met you	17	F	\ Uh-huh. MR. SCHRIMPF: Could I ask the
18		testimony under oath. I don't think I ever met you before. We'll get used to each other a little bit.	18	F	MR. SCHRIMPF: Could I ask the
18 19		testimony under oath. I don't think I ever met you before. We'll get used to each other a little bit. You'll get used to my German accent and we'll get	18	F	MR. SCHRIMPF: Could I ask the witness and counsel to speak up just a bit
18 19 20		testimony under oath. I don't think I ever met you before. We'll get used to each other a little bit. You'll get used to my German accent and we'll get this whole thing rolling. Is that okay?	18 19 20	P	MR. SCHRIMPF: Could I ask the witness and counsel to speak up just a bit because sometimes you're close to each
18 19 20 21		testimony under oath. I don't think I ever met you before. We'll get used to each other a little bit. You'll get used to my German accent and we'll get this whole thing rolling. Is that okay? Uh-huh.	18 19 20 21	F	MR. SCHRIMPF: Could I ask the witness and counsel to speak up just a bit because sometimes you're close to each other and sometimes you're fading off and it's
18 19 20 21 22	Q	testimony under oath. I don't think I ever met you before. We'll get used to each other a little bit. You'll get used to my German accent and we'll get this whole thing rolling. Is that okay? Uh-huh. Any questions?	18 19 20 21 22	F	MR. SCHRIMPF: Could I ask the witness and counsel to speak up just a bit because sometimes you're close to each other and sometimes you're fading off and it's difficult to hear you.
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18 19 20 21 22 23 24	Q A	testimony under oath. I don't think I ever met you before. We'll get used to each other a little bit. You'll get used to my German accent and we'll get this whole thing rolling. Is that okay? Uh-huh. Any questions? Yes. I don't understand what they are — they can't ask me questions?	18 19 20 21 22 23 24	F	MR. SCHRIMPF: Could I ask the witness and counsel to speak up just a bit because sometimes you're close to each other and sometimes you're fading off and it's difficult to hear you. MR. ARELLANO: Boy, I'm honored. This is the first time somebody asked me to
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1		· · · · · · · · · · · · · · · · · · ·		-,		Sheet 3
'		MR. FINERTY: Do you want to change	1	Ç	Anything else other than typesetting?	
2		seats with me?	2	Α	No.	
3		MR. SCHRIMPF: No, that's okay.	3	С	For how long are you still working for that	
4		MR. ARELLANO: Thank you,	4	`	company?	
5		counsel, and just let me know. I want to make	5	Δ	Oh, no.	
6		sure you participate in this.	6		·	
7	(Any special training other than your academic	7	V	Tell me the period of time in which you were	
8	Ì	accomplishments?	1		employed by A. B. Data.	
9	1		8	А	Maybe '86, '85, '86. I'm not sure specifically the	
	7	(No verbal response).	9		dates.	
10	(Yes. And that is one thing that probably every	10		(Discussion off the record).	
11		lawyer should have, would have advised you to do, we	11	Q	'85, '86 did you say?	
12		have two professional reporters that need a verbal	12		I think so, yes.	
13		answer.	.13		Okay, very good. And what is your current	
14	Α	Okay, okay.	14	`	occupation right now?	
15	(I usually will understand the nodding or the uh-huh,	15	Α	I'm a political fund raiser.	
116		but we do want the record to be very clear. So you	16	0	And tell majust it sounds libraril 1.6	
17		will have to take the extra effort to say yes, no, I	17	Y	And tell me just it sounds like a self-defining	
18		don't recall, et cetera.	18		title, but tell me the nature of the work that you	
19	Α	Okay.	19	٨	do as a political fund raiser.	
20		You mentioned that you have no special training in		^	I raise money for various politicians.	
21	Q		20	Ų	And is this a full-time job?	
22		any field other than what you accomplished in your	21		Yes.	
	Α.	college?	22	•	Perhaps beyond full-time?	
23		No.	23		Yeah.	
24		Very good. Are you married?	24	Q	Is that correct?	4 4 _{4.1}
25	Α	Yes.	25	Α	Right.	
L		9			11	į
1	Q	Who are you married to?	1	O	And do you have a consulting firm? Is this a	<u> </u>
2		Charles Pruitt.		Y	business that you own? Is that was?	(%)
3		How do you spell the last name?		Δ	business that you own? Is that yes? It's not a corporation.	
4		P-R-U-I-T-T.	. J			75 12.
5		P-R-U-I-T-T. See, I can't even write. All right.	-		Okay.	
6	V	What is his profession?	5		Yes.	
7	٨	•	6		How is this business identified?	ł
8	Α	He owns A. B. Data, which is a political consulting	7		I work out of my home.	
ı	^	firm.	8		Do you advertise?	ł
9	Q		9		No.	
10		In a suburb of Milwaukee.	10	Q	Do you have a business card that you carry with	you?
11		How long has he owned this consulting firm?	11	Α	No.	·
12		16 years.	12	Q	Is there a title or just your name?	- 1
13	Q	Are you or have you ever been employed for this	13		Just my name.	ı
14		particular consulting firm?	14		Just by your name, okay. And so you would rep	rocont
15		Yes.	15		yourself as a Barb Candy, Ms. Barb Candy, a	resent
16		In what capacity?	16		political fund raiser?	l
17		I ran their typesetting company.			Yes.	
18		Anything else?				1
19		• •			And for how long have you been doing this,	1
		Nope.	19		Ms. Candy?	ı
20			20	Α	Since 1984, minus the two years when I was doin	g the
21			21		other.	
22			22	Q	And when you were working along with your hu	sband?
23			23	Α	Uh-huh.	
24			24	Q	Is that right? What about your husband? Is he	
25		•	25	•	involved in any way in political fund raising?	l
		10			12	. [
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Cas	- C	ompress Deposition of DANDANA	11. 0		5neet 4
1	A	Well, as I said, he has a direct mail firm, so he	1	Α	Yes.
2		does no work in Wisconsin.	2	Q	But for the last election campaign, was that
3	Q	He does not?	3		something that you had been doing?
4	Α	No.	4	Α	Yes.
5	Q	Has he ever done any work for any politician here in	5	Q	An ongoing basis?
6		Wisconsin?	6	Α	Yes.
7	Α	He works for Senator Kohl and has done work,	7	Q	You were constantly representing his interest; is
8		although I do not believe he's ever been paid, from	8		that correct?
9		Mayor Norquist.	9	Α	Constantly raising money, yes.
10	Q	When did he do work for Mayor John Norquist?	10		All right. Can we agree that when I mention the
11	-	He's been involved in all his campaigns.	11		word the last re-election campaign, we are
12		Every campaign?	12		addressing the re-election campaign which concluded
13	-	Yes. Less so in the first one but in all of them.	13		in April of the year 2000?
14		And is it your sworn statement here that he has	14	Α	(No verbal response)
15	`	never received compensation from Mr. Norquist?	15		Let me just quickly give you a little direction here
16	Α	I don't I can't I don't know.	16	`	so as not to place your attorney in a tough
17	0	You're not able to tell me that?	17		predicament. Your attorney cannot assist you
18	-	No.	18	Α	Okay.
19		Have you ever coordinated fund raisers with your	19		in formulating any answers.
20	`	husband for any local politician?	20		Okay.
21	Α	Senator Kohl.	21		And I would never claim that he would. But it's
22		Senator Kohl. What years? Is that ongoing?	22	-	important that the client understands that.
23		Uh-huh.	23	Α	Okay.
24		Is that yes?	24		Very often clients who are not lawyers tend to look
25		Yes.	25	`	around and say you know the date. Unfortunately,
		13			15
1	0	When he worked for Mr. Norquist, do you recall the	1		the record needs to be clear.
2	Q	period of time? When was the last time that he	2	Α	Okay.
3		performed any type of political fund raising or any	3		And this has to be your testimony and only your
4		type of political work on behalf of Mr. Norquist?	4	•	testimony.
5	Α	I think he was the last time was in the last	5	Α	Okay.
6		campaign.	6		MR. ARELLANO: Is that okay,
7	0	And let's talk about that. Tell me when did the	7		counsel?
8	`	last campaign begin and when it ended.	8		MR. FINERTY: That's fine. And I
9	Α	It ended on election day.	9		would remind you, you know, try and say yes or
10		Which was? You should be aware that I live in	10		no audibly so the microphone can pick it up.
11	`	Madison, Wisconsin.	11		THE WITNESS: Okay.
12	Α	Right, right.	12		MR. ARELLANO: I think you're doing
13		And, you know, this is totally unnecessary for the	13		very fine. But thank you, counsel.
14	`	record, but just like Milwaukee doesn't care what's	14		MR. FINERTY: I was going to say,
15		going on in Madison, Madison doesn't care a lot	15		just relax. You're doing all right.
16		about what's going on in Milwaukee.	16		MR. ARELLANO: Anyway, I've got the
17	Α	I don't remember. It was the first April in the	17		tough job. I'm the one who has to come up
18	. •	first Tuesday in April of 2000.	18		with some questions. All right.
19	0	April of 2000?	19	0	So is it fair and accurate to say that when I use
20	_	Yes.	20	*	the term the last re-election campaign, you and I
21		Do you know when the campaign began to actually,	21		will understand that I'm referring to the April 2000
22	*	when the campaign kicked, started to work on	22		last re-election campaign?
		• •	23	Α	Yes.
		Mayor Norquist's re-election campaign?			
23	Α	Mayor Norquist's re-election campaign? Well, I'm always working on it.			
23 24		Well, I'm always working on it.	24	Q	Is that okay?
23		• •		Q	

	Deposition of BANDANA	Sheet 5
1	MR. ARELLANO: Am I loud enough for	1 Q Was he the director of the campaign?
2	you, Mr. Schrimpf?	2 A Yes.
3	MR. SCHRIMPF: Yes, fine.	3 Q Who else was involved in the paying aspect of the
4	MR. ARELLANO: Thank you.	4 campaign?
5	Q Now you mentioned that your husband also worked	5 A Myself.
6	during that campaign?	6 MR. SCHRIMPF: I'm sorry, I didn't
7	A Worked is not a term I'd use. He helped in that	7 hear that.
8	campaign.	8 THE WITNESS: Me.
9	Q Do you again I think you may have answered this	9 MR. SCHRIMPF: Oh.
10	question in a rather general fashion. Did your	
11	husband receive any type of compensation for the	1 ` ,
12	contribution?	,
13		1
4	A Not that I'm aware of.	,
14	Q Do you have any idea as to how much time	14 Q Anyone else?
15	percentage-wise he invested, I'm speaking of your	15 A Wendy Kukuk.
16	husband, he invested in assisting Mr. Mayor's	16 Q Is that C-O-K?
17	political re-election?	17 A It's K, I think it's K-U-K-U-K.
18	A It was a volunteer thing on his personal time.	18 Q Anyone else?
19	Q Do you have a clue as to the percentage of time that	19 A That's all I'm aware of. There were some
20	he a a a a a a a a a a a a a a a a	20 Marilyn.
21	A Maybe two hours a week.	21 Q Okay: Staff, Mayor's staff?
22	Q I have to ask you these questions because I just	22 A Pardon me? De la casa la
23	want to put your husband and you in proper context.	23 Q Some of the staff that worked for the Mayor?
24	A Right.	24 A Just Marilyn I believe.
25	Q Do you have any children?	25 Q Marilyn Figueroa, okay.
1.	17	19
1	A Yes.	1 A There were people hired that I never met
2	Q How old is the youngest child?	2 Q Okay.
3	A 15.	3 A who were field organizers.
4	Q So you do have some home responsibilities in	4 Q And can we add your husband as well?
5	addition to working for Mr. Norquist?	5 A No.
6	A Right.	6 Q No?
7	Q Is that correct?	7 A No.
8	A Right.	8 Q Even though he participated in the campaign?
9	Q What type, if you know, what type of work was your	9 A Right, right.
10	husband doing on behalf of Mayor Norquist for the	10 Q But he was not getting paid?
		11 A No.
11	last re-election campaign?	
12	A Strategy.	, , , , , , , , , , , , , , , , , , , ,
13	Q Why don't you, if you can, give me a structure or a,	13 A Advising.
14	some sort of a diagram of all of the political	14 Q I suspect you, if there were any planning or
15	campaign staff for Mayor Norquist for the last	15 strategy meetings, you would participate?
16	re-election.	16 A That's not necessarily the case.
17	A You mean paid people or	17 Q But in some cases you did?
18	Q Both. Let's start with the paid people.	18 A In some cases I did.
19	A Okay.	19 Q Is that right?
20	Q Let's give them priority.	20 A Yes.
21	A Okay.	21 Q Do you recall some of the meetings where you
22	Q Who was the director of the political campaign?	22 participated to deal with the strategy?
23	A Bill Christofferson.	23 A Yes.
24	Q Is his name William Christofferson, if you know?	24 Q And again we're talking about the last
25	A Yes, yes.	25 re-election
	18	20
	BATIM REPORTING SERVICE, LLC (608) 25	

1	Sheet
2 Q - of 2000, okay. I suspect most of the strategy meetings would have been coordinated by 4 Mr. Christofferson? 5 A Right. 6 Q Is that correct? 7 A Right. 8 Q And if I say I have never met the gentleman. But being from Madison, is it fair and accurate to say that Mr. Christofferson would be the one making all the calls as far as strategy and so on and so forth for the last re-election of Mayor Norquist? 13 A I think there was more. There was some input. I mean it wasn't unilateral. 14 Q I'm not saying that he was the dictator. 16 A Right. 17 Q But what I'm saying, I suspect it was a team effort; is that correct? 18 A Right. And there were posters and media people. 20 Q And as far as the Mayor's staff, other than Marilyn Figueroa, do you recall who, if anyone else, participated – actually participated in the campaign? 24 A As an employee? 25 Q Correct. 26 27 28 (What about as a volunteer? 29 What about as a volunteer? 20 Q What about as a volunteer? 3 A I think everybody kind of helps. 4 Q Way. Mr. Soika participated as well? 5 A Who? 6 Q Mr. Michael Soika? 7 A Notthat I encountered. 8 Q Do you know Mr. Soika? 9 A Yes. 10 Q What about other staff members other than Ms. Figueroa that may have participated in the re-election of Mayor Norquist? 10 Q What about other staff members other than Ms. Figueroa that may have participated in the re-election of Mayor Norquist? 1 A I think everybody volunteered. 1 Q Do you recall any specific? 2 Q I how would you characterize relationship with Marilyn Figueroa? 3 A I think were was more a I didn't know her that wash the didin't know her that wash the lidin't know her that was	
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a tarking Mayor Nording Stant menders, did you have the fusibanc events for the Mayor" time art inns	mac
· · · · · · · · · · · · · · · · · · ·	HCdH
17 raising activities?	
18 A Assigned?	
19 Q To work, to coordinate?	
20 A Well, Marilyn helped me. 20 Q Like which ones?	
21 Q Marilyn helped you? 21 A Jay Walia, which was an Indian, and again it	s more
22 A Yes. 22 Hispanic.	
23 Q Let's talk about Marilyn. How long have you known 23 Q Anything else?	
24 Marilyn Figueroa? 24 A No.	
25 A Since she came to work in the Mayor's office. Was 25 Q Those are the projects that clearly come to mi	nd
22 24	

1	Α	Right.	1	Q	Is that correct?
2	Q	when it comes to Marilyn Figueroa and fund	2	Α	Yes.
3	•	raising activities; is that right?	3	Q	And is it fair and accurate to say that
4	Α	Right. She also would help - when we'd get large	4		Mr. Christofferson would have been the director of
5		fund raisers, she would help.	5		the entire team; is that correct?
6	0	Like which large fund raisers?	6	Α	Yes.
7		Well, we do a yearly event that she would help with.	7		Where would Michelle fall? Would she assist
8	. * `	We did things like fish frys, which were lower	8	~	Mr. Christofferson?
9		dollar events which she would help with.	9	Δ	Yes.
10	Λ	The last one, I'm sorry, could you read that back.	10		Is that right? Where would you fall? You were
	Ų		11	V	pretty much
11	^	(Last part of the answer read)	12	Δ	On my own.
12		What do you mean by lower dollar event?	13		independent?
13	А	Where you're trying to get a lot of people there for	14		On my own.
14	^	10, 15, \$20.	15.		•
15	_	Small amounts?	1	-	You were the one with the money?
16		Yes.	16 17		Right. But you did coordinate things with
17	_	Is that correct?		Ų	Mr. Christofferson; is that correct?
18		Right.	18 19	. Λ	
19	Q	With respect to the first events that you cited			More or less. I'm pretty independent.
20 21		dealing with a Hispanic or the Afro-American		Ų	I suspect Mr. Norquist was also involved in this
21		community or the Indian community, was she primarily	21	٨	campaign team as well; is that right?
22 23		responsible for putting all those together?	1 -		Yes, the second dispersion of the first of the second seco
		Yes.	23		I've just got to get you to say —
24	Q	The lower dollar amount, was she the primary source	24		Yes, yes,
25	7.1	or was she just assistant?	25	Ų.	And I suspect he was involved in meetings related to
		25	L		27
4 44 100	100	were the company of t			
.] 1	Α	These were team efforts of a lot of people.	1 1		strategy, planning and so on and so forth?
1 2		These were team efforts of a lot of people. All right. Any other activities that you recall	2	Α	Not always but
1 2 3			1 2 3	Α	0, 1
	Q	All right. Any other activities that you recall	_	Α	Not always but
3	Q	All right. Any other activities that you recall working with Ms. Figueroa?	3	A Q	Not always but But obviously he needed to be informed; is that
3	Q	All right. Any other activities that you recall working with Ms. Figueroa? No, this was pretty much —	3 4	A Q A	Not always but But obviously he needed to be informed; is that correct?
3 4 5	Q	All right. Any other activities that you recall working with Ms. Figueroa? No, this was pretty much — This is pretty much it? Okay. Let me go back to my — back to the group that were pretty much in	3 4 5	A Q A Q A	Not always but But obviously he needed to be informed; is that correct? Yes, yes. That's all right. Yes.
3 4 5 6	Q	All right. Any other activities that you recall working with Ms. Figueroa? No, this was pretty much — This is pretty much it? Okay. Let me go back to my — back to the group that were pretty much in control of the political campaign. You mentioned	3 4 5	A Q A Q A	Not always but But obviously he needed to be informed; is that correct? Yes, yes. That's all right.
3 4 5 6 7 8	Q A Q	All right. Any other activities that you recall working with Ms. Figueroa? No, this was pretty much — This is pretty much it? Okay. Let me go back to my — back to the group that were pretty much in control of the political campaign. You mentioned Mr. Christofferson and then you mentioned Michelle?	3 4 5 6 7	A Q A Q A	Not always but But obviously he needed to be informed; is that correct? Yes, yes. That's all right. Yes.
3 4 5 6 7 8 9	Q A Q	All right. Any other activities that you recall working with Ms. Figueroa? No, this was pretty much — This is pretty much it? Okay. Let me go back to my — back to the group that were pretty much in control of the political campaign. You mentioned Mr. Christofferson and then you mentioned Michelle? Right.	3 4 5 6 7 8	A Q A Q A	Not always but But obviously he needed to be informed; is that correct? Yes, yes. That's all right. Yes. It's taken me all these years to learn that. No
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3 4 5 6 7 8 9 10	Q A Q A Q A	All right. Any other activities that you recall working with Ms. Figueroa? No, this was pretty much — This is pretty much it? Okay. Let me go back to my — back to the group that were pretty much in control of the political campaign. You mentioned Mr. Christofferson and then you mentioned Michelle? Right. What's her role? Is that a he or she? That's a she. She was a campaign manager.	3 4 5 6 7 8 9	A Q A Q A Q	Not always but But obviously he needed to be informed; is that correct? Yes, yes. That's all right. Yes. It's taken me all these years to learn that. No problem. Was there any individual responsible for
3 4 5 6 7 8 9 10 11	Q A Q A Q A	All right. Any other activities that you recall working with Ms. Figueroa? No, this was pretty much — This is pretty much it? Okay. Let me go back to my — back to the group that were pretty much in control of the political campaign. You mentioned Mr. Christofferson and then you mentioned Michelle? Right. What's her role? Is that a he or she? That's a she. She was a campaign manager. Can you just — I'm sorry, I never participated in a	3 4 5 6 7 8 9 10	A Q A Q A Q A	Not always but But obviously he needed to be informed; is that correct? Yes, yes. That's all right. Yes. It's taken me all these years to learn that. No problem. Was there any individual responsible for dealing with the press?
3 4 5 6 7 8 9 10 11 12 13	Q A Q A Q A	All right. Any other activities that you recall working with Ms. Figueroa? No, this was pretty much — This is pretty much it? Okay. Let me go back to my — back to the group that were pretty much in control of the political campaign. You mentioned Mr. Christofferson and then you mentioned Michelle? Right. What's her role? Is that a he or she? That's a she. She was a campaign manager. Can you just — I'm sorry, I never participated in a political campaign. But can you tell me what a	3 4 5 6 7 8 9 10 11	A Q A Q A Q A	Not always but — But obviously he needed to be informed; is that correct? Yes, yes. That's all right. Yes. It's taken me all these years to learn that. No problem. Was there any individual responsible for dealing with the press? I think Bill dealt with the press.
3 4 5 6 7 8 9 10 11 12 13 14	Q A Q A Q	All right. Any other activities that you recall working with Ms. Figueroa? No, this was pretty much — This is pretty much it? Okay. Let me go back to my — back to the group that were pretty much in control of the political campaign. You mentioned Mr. Christofferson and then you mentioned Michelle? Right. What's her role? Is that a he or she? That's a she. She was a campaign manager. Can you just — I'm sorry, I never participated in a political campaign. But can you tell me what a campaign manager is supposed to do?	3 4 5 6 7 8 9 10 11 12 13	A Q A Q A Q A	Not always but — But obviously he needed to be informed; is that correct? Yes, yes. That's all right. Yes. It's taken me all these years to learn that. No problem. Was there any individual responsible for dealing with the press? I think Bill dealt with the press. Mr. Christofferson. And was there anyone involved,
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3 4 5 6 7 8 9 10 11 12 13 14 15 16	Q A Q A Q A	All right. Any other activities that you recall working with Ms. Figueroa? No, this was pretty much — This is pretty much it? Okay. Let me go back to my — back to the group that were pretty much in control of the political campaign. You mentioned Mr. Christofferson and then you mentioned Michelle? Right. What's her role? Is that a he or she? That's a she. She was a campaign manager. Can you just — I'm sorry, I never participated in a political campaign. But can you tell me what a campaign manager is supposed to do? She was supposed to every day make the stuff happen that needed to happen. She oversaw the day-to-day.	3 4 5 6 7 8 9 10 11 12 13 14 15	A Q A Q A Q A	Not always but — But obviously he needed to be informed; is that correct? Yes, yes. That's all right. Yes. It's taken me all these years to learn that. No problem. Was there any individual responsible for dealing with the press? I think Bill dealt with the press. Mr. Christofferson. And was there anyone involved, and some of this — I know a lot of these questions may sound real silly to you, but I'm trying to get
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		Compless Deposition of BANDAINA		(VOE. I) HO HOZ
	1	during his political re-election?	1	MR. ARELLANO: Do you have that
	2	A I don't know.	2	with you?
	3	Q If there was any, who would have been responsible	3	MR. FINERTY: Yes.
	4	for that aspect?	4	MR. ARELLANO: That probably will
	5	A I assume Bill and Michelle.	5	save us some time.
	6	Q Okay, very good. Now, during your last re-election	6	MR. FINERTY: Yes. Let's take a
	7	campaign who would you say were your largest	7	second.
	8	contributors for Mr. Norquist, in Wisconsin?	8	(Discussion off the record)
	9	A You want names?	9	MR. ARELLANO: I am sensitive to
	10	Q Yes. I mean it's public information.	10	your concerns, counsel, for Ms. Candy, but let
	11	A Right, right.	11	me give you the assurance that came in the
	12	Q But you can go ahead and tell me right now.	12	form of an order from the judge. None of
	13	A I don't know if I can remember.	13	these documents can be released to the public
	14	Q Well, mention the top.	14	until the day of the hearing. And I suggest
į	15	A Oh, Dan Katz.	15	that if there will be any objections, that
	16	Q How do you spell the last name?	16	those objections be raised on the day of the
	17	A K-A-T-Z.	17	hearing. None of these records will be in
	18	Q Anyone else?	18	fact I have somewhat refused to let the City
		A We had a large number of people who gave the amount,	19	touch anything because anyone can get them
	20	the largest amount you could give. Mr. Finerty is	20	from the City, and I'm trying to find a way.
	21	one of our largest donors.	21	I personally feel that none of these records
	22	Q Any corporations?	22	would be released until May 6th which is the
	23	A No. They can't give.	23	day of the trial. In the meantime, you can
	24	Q I would ask anyway.	24	allow me to read them. I don't want to read
- /	25	A Okay. I wish they could.	25	them right now because of the limited time
		29		31
	4	O What about any tan averative from any of the least	1	that the Data will be the first of the
	1	Q What about any top executive from any of the local	1	that she has. But I will be mindful and will
	2 -	newspapers?	2	offer you the opportunity to think about it.
	3	newspapers? A No.	2 3	offer you the opportunity to think about it. I would review them, and if I find them of
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1 4		T 4	
1	understand.	1	has been marked as Exhibit No. 2?
2	MR. FINERTY: So if Cheri wants to	2 A	Ask that again, please.
3	go over there and meet my secretary and run a	3 (Can you I know that was a long question.
4	copy, then we can do it that way.	4	MR. ARELLANO: Go ahead.
5	MR. ARELLANO: Or during break you	5	(Question read)
6		1 .	Yes.
7	can just go get it. No problem.		
1′	MR. FINERTY: I don't know how to		How many people are not which contributed to the
8	operate the copy machine.	8	campaign are not in this list?
. 9	MR. ARELLANO: She's my paralegal,	9 <i>F</i>	I do not know.
10	and if I start giving her different	10 (And can you tell me why those individuals, whichever
11	assignments, she may go on strike or to the	11	number it may be, are not in this list?
12	union.		Because I don't have that list.
13	MR. FINERTY: I was going to go		Who would have that list?
14			
	over to my office and she could give somebody	145	The campaign has it. The computer person for the
15	else the assignment. That's what a paralegal	15	campaign maintains that list.
16	does.		And who would that be?
17	MR. ARELLANO: All right. That's		His name is Peter Turner.
18	fine. Anyway, let me ask you to mark these		And is this person still employed for the political
19	documents as an exhibit. This will be	19	campaign?
20	Exhibit No. 2.	20 A	Yes, yes.
21	MR. SCHRIMPF: I'm sorry, what was		How are these individuals paid? Let's talk about
22	Exhibit No. 1?	22	you, for example.
23	MR. ARELLANO: Exhibit No. 1 which		Uh-huh.
24	has not been introduced, counsel, is the		How are you compensated?
25	subpoena duces tecum that we sent to		On a monthly salary.
120	33	20 7	35
1 .	33		· JJ
			and the second s
1	Ms. Candy. But I'm kind of slow and it takes	1 C	And the salary comes from which funds?
1 2	Ms. Candy. But I'm kind of slow and it takes me time to do things.		And the salary comes from which funds? The campaign funds.
1 2 3	me time to do things.	2 A	The campaign funds.
3	me time to do things. (Exhibit No. 2 marked for	2 A 3 C	The campaign funds. And who is the record keeper of the campaign funds?
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3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18 19 20 21	me time to do things. (Exhibit No. 2 marked for identification) Q Let me show you, Ms. Candy, what has been marked as Exhibit No. 2 of your deposition. And just for the record, can you please state or describe what this Exhibit 2 purports to represent? A It's a list of people who give Mayor Norquist \$250 or more a year. Q Very good. And those are all of the records that you have within your possession and that you have produced today pursuant to my subpoena? A Right. Q Is that correct? Okay. Let me take a look at those records. Are these pages numbered? Yes, they are. A Yes, they are. Q Let the record reflect that Exhibit No. 2 contains a total of 64 pages. Is that accurate? A Yes. Q Okay, very good.	2 A 3 A 5 A 7 8 9 10 A 11 12 13 14 15 A 16 17 18 19 20 A 21 22 Q	The campaign funds. And who is the record keeper of the campaign funds? Steven Jacobs at Reinhart, Boerner, Van Deuren. Is he an attorney? Yes. And I suspect the same answer would apply for Mr. William Christofferson, he gets paid from the same fund? Yes. Is that correct? Yes. Is Mr. Christofferson still actively involved in the political works of Mr. Norquist? You mean is he paid? Well, first of all, is he still working there? He's not paid. But is he still working there? Is he doing any work on behalf of Mayor Norquist? I don't know. I know he's no longer receiving a salary.
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3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18 19 20 21 22 23	me time to do things.	2 A C A C A C A C A C A C A C A C A C A	The campaign funds. And who is the record keeper of the campaign funds? Steven Jacobs at Reinhart, Boerner, Van Deuren. Is he an attorney? Yes. And I suspect the same answer would apply for Mr. William Christofferson, he gets paid from the same fund? Yes. Is that correct? Yes. Is Mr. Christofferson still actively involved in the political works of Mr. Norquist? You mean is he paid? Well, first of all, is he still working there? He's not paid. But is he still working there? Is he doing any work on behalf of Mayor Norquist? I don't know. I know he's no longer receiving a salary. I didn't quite get that last. He's no longer receiving a salary.

1	Α	I would say the end of the summer, but I have to say	1	Α	Yes.
2		I'm not sure about that.	2	Q	Did some of these concerns develop in 1999 during
3	0	For the year, for this last re-election campaign,	3	•	the campaign?
4	`	just a ballpark figure, you were the primary money	4	Α	No. Not from what I not from what I experienced.
5		getter; is that correct?	5		What period of time do you recall, when was the
6	Α	Right.	6	`	first time that some of these rumors or concerns
7		Can you give me some ballpark figure as to how much	7		were brought to your attention?
8	`	you caused the Mayor to obtain through	8	Α	February of 2000.
9		contributions?	9		Is there one individual and you don't have to
10	Α	How much did the Mayor raise?	10	•	disclose that name if you don't want to, at least
11		Right.	11		for now. Is there any one specific contributor that
12		Over a million dollars.	12		was more than just curious to know what was going
13		For the last re-election	13		on?
14	_	Yes.	14	Α	No.
15		did there come a time when issues of concern	15	Q	Tell me some of the comments that you would get in
16	`	regarding the Mayor's behavior or politics or	16	•	February 2000 regarding some of the rumors that you
17		opinions became a concern to any of the contributors	17		were
18		with whom you worked?	18	Α	People just wondered what was going on.
19	Α	You're going to have to repeat that.	19	Q	And what did you understand that they wanted to
20		Okay. During the last re-election campaign, to your	20		know?
21	. `	knowledge, do you recall whether or not any of the	21		People were asking about Marilyn.
22		contributors ever questioned or had any concerns	22	Q	Tell me, as best as you can as you sit here under
23		about rumors regarding Mayor Norquist?	23		oath, tell me verbatim some of the comments that
24	Α	Expressed to whom?	24		they would relate to you, best as you can.
25	Q	Expressed to you.	25	A	They just were asking about the Mayor's and
		37			39
1	Α	Concerns is too strong a word.	1	. *	Marilyn's relationship.
1 2		Concerns is too strong a word. They were curious?	2	Q	Anything else?
	Q A	They were curious? Curious.	1	Q	Anything else? No.
2 3 4	Q A	They were curious? Curious. Okay, very good. And to your knowledge, how many	2 3 4	Q	Anything else? No. And the first time — is it your testimony today
2 3	Q A	They were curious? Curious. Okay, very good. And to your knowledge, how many people raised the issue, if there was any, regarding	2 3 4 5	Q	Anything else? No. And the first time — is it your testimony today that the first time that these concerns were raised
2 3 4	Q A Q	They were curious? Curious. Okay, very good. And to your knowledge, how many people raised the issue, if there was any, regarding Mayor Norquist's rumors about his personal life?	2 3 4	Q	Anything else? No. And the first time — is it your testimony today that the first time that these concerns were raised regarding Marilyn and the Mayor's, his relationship
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2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18 19 20 21 22 23	QAQ AQAQAQ AQ AQ	Curious. Okay, very good. And to your knowledge, how many people raised the issue, if there was any, regarding Mayor Norquist's rumors about his personal life? I don't know how to quantify that. Several? Yes. Many? Yes. Is that correct? Yes. Did there come a time when some of these contributors hesitated to support the Mayor because of some rumors? Not the people I dealt with, no. Is that correct? Anyone that you know of that may have changed their position with respect to whether or not they would support the Mayor during the last re-election campaign because of rumors? Not from my personal experience, okay. And these rumors that we haven't talked about, I	2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18 19 20 21 22 23	QAQ AQA C ACA	Anything else? No. And the first time — is it your testimony today that the first time that these concerns were raised regarding Marilyn and the Mayor's, his relationship with Marilyn I suspect, that happened for the first time in February of 2000? As I remember it, not like February 1st but sometime. During the early part of 2000? Well, that's not — yeah, I would say. Is that right? But before he was finally re-elected? Yes. True? I'm comfortable saying before he was re-elected, yes. Okay. Do you recall in 1999 anyone raising the same concerns? To me? Correct. No, not that I recall.

		TOPOCIAL OF BANDAIA	17. 1	J/\ \	Sheet 1
1	Α	No.	1	A	Susan Mudd.
2	Q	You personally, Ms. Candy, when was the very first	2	Q	Did you know Ms did you know Susan let me
3		time that you raised that question, if you ever did?	3		call her Susan. I don't want to mispronounce her
4		Did you ever think about that issue that was being	4		last name. Did you know her before you met
5		raised in early 2000, what is going on between the	5		Mr. Norquist?
6		Mayor and Marilyn Figueroa?	16	Α	No.
7	Α	Did I ever think about it?	7		Is it fair and accurate to say that you met her
8		Right.	8		through Mr. Norquist?
9		In what way?	9	Α	Yes.
10		In a rather questionable way.	10		Is that correct?
11		Personally?	11	-	Yes.
12		Yes.	12		All right. Did you ever socialize with Mr. Norquist
13	•	No, not at that point.	13	Q	and his wife?
14		Did there come a time when you did?	14	Δ	Yes.
15		No.	15		
16		Ever?	16	_	Visited each other's homes?
17	•	No.	17		Occasionally.
18					Had dinner?
19	Ų	Is there a reason why it never crossed your mind	18		Yes. A second of the second of
		after, after you learned from some contributors that	19		Went out together?
20	Λ	they were curious to know what was going on?	20		Yes. The second
21 22	. ^	Because John's John. I mean I just didn't think he	21	•	Is that correct?
	^	would do that.	22		Yes.
23		You didn't think he would do that?	23	Ų	In February or March of the year 2000 just before he
24		Yes.	24		became re-elected, your reaction at least in your
20	: Q .	All right. When did you strike that. Some of	25	4 .	mind at that time was that you didn't think he would
		41			43
1		the people that raised this issue with you regarding	.1		ever do that?
2		John Norquist and Marilyn Figueroa back in	2	, A	No. and the explanation of the second of the
3		February of 2000 but before he was re-elected, and I	3		Is that correct?
4		understand you don't want me to hold you to a	4	Α.	That's correct.
5		specific date?	5.	Q	And again, I don't think I was clear or I didn't
6		Right, right.	6		hear you clearly. What, if any, response did you
7	Q	And I understand that. Did anyone ever tell you how	7		provide to those contributors that were concerned or
8		they learned of these rumors, what led them to	8		raised inquiries about the relationship?
9		question this particular relationship?	9	Α	I didn't believe any of the rumors were true.
10	Α	It just seemed to be out there. People were talking	10	Q	So is it fair and accurate to say that you would
11		about it.	11		then deny it when
12	Q	When did you sense for the first time that this	12	Α	Yes.
13		rumor was out there?	13	Q	they would imply it?
14	Α	It had to have been February or March.	14		Yes.
15	Q	In February or March when these contributors would	15	Q	You would deny that?
16		talk to you and raise this issue, what response	16	Α	Yes.
17		would you give them, if any?	17	Q	Before the re-election of Mayor Norquist, and I'm
18		That I didn't think he would do that.	18	-	talking about the re-election of 2000 but prior
19		How long have you known Mr. John Norquist,	19		these rumors coming to your attention or even
20		Ms. Candy?	20		crossing your mind in any way, how would you
21		Since 1987.	21		describe your relationship with Mr. Norquist?
22		And are you familiar with, or friends with his	22	Α	I don't know. That's a tough one. I spend a fair
23		spouse?	23	-	amount of time with him, but I wouldn't say we're
24		Yes.	24		very close. I don't think he's close to a lot of
					-
125	O	And what's her name?	I ZO		Deoble.
25	Q	And what's her name? 42	25		people.

1	ОН	Iow would you describe his personality? Just your	1		their morality or their philosophy, that became a
2		wn opinion.	2		problem for you?
3	Δ Δ	an awkward personality I think is the word that	3	Α	Could have become, yes, yes.
4		omes to mind.	4		MR. ARELLANO: Can we just take a
5	∩ P ₁	rior to January of 2000 did you recall any one time	5		two-minute break, counsel.
	Q 11	when Mr. Norquist, at least you felt Mr. Norquist	6		(Discussion off the record)
6	W	vas not honest with you, where you felt that you	7	Bv	Mr. Arellano: (Continuing)
7	W	vere compromising your respectful position in this	8	0	Mrs. Candy, do you recall would it be really
8	W	ommunity? Do you recall any one time when you felt	9		unfair of me to ask you to identify this exhibit
9	CC	nat you were placing your name in the middle of	10		which contributors questioned you about
10		· ·	11		Mr. Norquist's alleged relationship with
11			12		Ms. Figueroa before he was re-elected in 2000?
12	A N		13		I couldn't even tell you.
13		difficult situation?	14		You could not. Any specific name that comes to
14	AN	NO.	15	Q	mind, to save you some time?
15	Q In	nversely, up to but up to January of 2000 but	16	Δ	No specific. You know, I would be out. People
16	pı	rior to learning some of these rumors or about	17	^	would ask me about it.
17	th	nese rumors, did you think that John Norquist	18	0	Did this issue, the Norquist/Figueroa rumors, did
18	sh	hould have disclosed that information to you before	19	V	that become an ongoing obstacle for you sort of
19	ar	nybody else came with these rumors, given your	20		
20	W	vorking relationship with him?		٨	speaking? It wasn't an obstacle.
21		hould he have told me about Marilyn?			But did that become some sort of a distraction
22	Q C	Correct	23	· V	during your fund raising activities?
23		ve had mixed feelings about this. Initially, yes,	24	Λ	It was something to be dealt with, yes.
24		did think so.	25		When these issues were raised or brought to your
25	Q:W	Vell, it was a fact that he was a married man?	23	Ų	47
L		45			tage of the second seco
1	AY	'es	1		attention as you were trying to raise money for
			i 🔼		The state of the s
2		n February of 2000?	2	1 12	Mr. Norquist, did you ever discuss those issues with
1		n February of 2000?	3	·	Mr. Christofferson?
2	Q Ir A Y Q C	n February of 2000? Yes. Correct?	3		Mr. Christofferson? No.
2 3	Q Ir A Y Q C A Y	n February of 2000? 'es. Correct? 'es.	3 4 5		Mr. Christofferson? No. Did you inquire with any of the campaign staff about
2 3 4	Q Ir A Y Q C A Y O A	n February of 2000? Yes. Correct? Yes. And it was a fact that in January and	3	Q	Mr. Christofferson? No. Did you inquire with any of the campaign staff about these issues
2 3 4 5	Q Ir A Y Q C A Y Q A	n February of 2000? Yes. Correct? Yes. And it was a fact that in January and Sebruary voters and contributors were concerned	3 4 5 6 7	Q A	Mr. Christofferson? No. Did you inquire with any of the campaign staff about these issues No.
2 3 4 5 6	Q Ir A Y Q C A Y Q A Fe	n February of 2000? Yes. Correct? Yes. And it was a fact that in January and February voters and contributors were concerned bout an extramarital affair that he was having with	3 4 5 6 7 8	Q A Q	Mr. Christofferson? No. Did you inquire with any of the campaign staff about these issues No. before he was re-elected?
2 3 4 5 6 7	Q Ir A Yo Q C A Yo Q A Fo al	n February of 2000? Yes. Correct? Yes. And it was a fact that in January and Yebruary voters and contributors were concerned bout an extramarital affair that he was having with Ms. Figueroa; true?	3 4 5 6 7 8 9	Q A Q A	Mr. Christofferson? No. Did you inquire with any of the campaign staff about these issues No. before he was re-elected? No.
2 3 4 5 6 7 8	Q Ir A Y Q C A Y Q A Fo al M	in February of 2000? Yes. Correct? Yes. And it was a fact that in January and Yebruary voters and contributors were concerned bout an extramarital affair that he was having with Ms. Figueroa; true? Concerned is too strong a word.	3 4 5 6 7 8 9	Q A Q A	Mr. Christofferson? No. Did you inquire with any of the campaign staff about these issues No. before he was re-elected? No. Did you ever discuss it, as you sit here under oath,
2 3 4 5 6 7 8 9 10	Q Ir A Y Q C A Y Q A Fo al M A C Q W	n February of 2000? Yes. Correct? Yes. And it was a fact that in January and Sebruary voters and contributors were concerned bout an extramarital affair that he was having with Ms. Figueroa; true? Concerned is too strong a word. Vell, they were curious.	3 4 5 6 7 8 9 10	Q A Q A Q	Mr. Christofferson? No. Did you inquire with any of the campaign staff about these issues No. before he was re-elected? No. Did you ever discuss it, as you sit here under oath, did you ever discuss it with your husband?
2 3 4 5 6 7 8 9	Q Ir A Y Q C A Y Q A Fo al M A C Q W	in February of 2000? Yes. Correct? Yes. And it was a fact that in January and Yebruary voters and contributors were concerned bout an extramarital affair that he was having with Ms. Figueroa; true? Concerned is too strong a word.	3 4 5 6 7 8 9 10 11	Q A Q A Q	Mr. Christofferson? No. Did you inquire with any of the campaign staff about these issues No. before he was re-elected? No. Did you ever discuss it, as you sit here under oath, did you ever discuss it with your husband? Yes.
2 3 4 5 6 7 8 9 10	Q Ir A Y Q C A Y Q A Fo al M A C Q W A O	n February of 2000? Yes. Correct? Yes. And it was a fact that in January and Sebruary voters and contributors were concerned bout an extramarital affair that he was having with Ms. Figueroa; true? Concerned is too strong a word. Vell, they were curious.	3 4 5 6 7 8 9 10 11 12 13	Q A Q A Q	Mr. Christofferson? No. Did you inquire with any of the campaign staff about these issues No before he was re-elected? No. Did you ever discuss it, as you sit here under oath, did you ever discuss it with your husband? Yes. What did you discuss with your husband? And I'm
2 3 4 5 6 7 8 9 10 11 12	Q Ir Q C A Y Q A Fe al M A C Q W A O Q Is A Y	n February of 2000? Yes. Correct? Yes. And it was a fact that in January and rebruary voters and contributors were concerned bout an extramarital affair that he was having with Ms. Figueroa; true? Concerned is too strong a word. Vell, they were curious. Okay. Is that correct? Yes.	3 4 5 6 7 8 9 10 11 12 13	Q A Q A Q A Q	Mr. Christofferson? No. Did you inquire with any of the campaign staff about these issues No. before he was re-elected? No. Did you ever discuss it, as you sit here under oath, did you ever discuss it with your husband? Yes. What did you discuss with your husband? And I'm talking about the period before he was re-elected.
2 3 4 5 6 7 8 9 10 11 12 13	Q Ir A Y Q Q A Y Q A A C Q M A C Q Is A Y Q A	res. Correct? Yes. And it was a fact that in January and Sebruary voters and contributors were concerned bout an extramarital affair that he was having with Ms. Figueroa; true? Concerned is too strong a word. Well, they were curious. Dikay. So that correct? Yes. And you would agree with me, would you not, that for	3 4 5 6 7 8 9 10 11 12 13 14	Q A Q A Q A Q	Mr. Christofferson? No. Did you inquire with any of the campaign staff about these issues No before he was re-elected? No. Did you ever discuss it, as you sit here under oath, did you ever discuss it with your husband? Yes. What did you discuss with your husband? And I'm talking about the period before he was re-elected. Re-elected. We talked about whether it could
2 3 4 5 6 7 8 9 10 11 12 13	Q Ir A Y Q Q A Y Q A A C Q M A C Q Is A Y Q A	n February of 2000? Yes. Correct? Yes. And it was a fact that in January and rebruary voters and contributors were concerned bout an extramarital affair that he was having with Ms. Figueroa; true? Concerned is too strong a word. Vell, they were curious. Okay. Is that correct? Yes.	3 4 5 6 7 8 9 10 11 12 13 14 15 16	Q A Q A Q A Q	Mr. Christofferson? No. Did you inquire with any of the campaign staff about these issues No before he was re-elected? No. Did you ever discuss it, as you sit here under oath, did you ever discuss it with your husband? Yes. What did you discuss with your husband? And I'm talking about the period before he was re-elected. Re-elected. We talked about whether it could possibly be true.
2 3 4 5 6 7 8 9 10 11 12 13 14 15	Q Ir A Y Q Q A Q A For al M A C Q W A O Q Is A Y Q A a	res. Correct? Yes. And it was a fact that in January and Sebruary voters and contributors were concerned bout an extramarital affair that he was having with Ms. Figueroa; true? Concerned is too strong a word. Well, they were curious. Dikay. So that correct? Yes. And you would agree with me, would you not, that for	3 4 5 6 7 8 9 10 11 12 13 14 15 16 17	Q A Q A Q A Q A	Mr. Christofferson? No. Did you inquire with any of the campaign staff about these issues No before he was re-elected? No. Did you ever discuss it, as you sit here under oath, did you ever discuss it with your husband? Yes. What did you discuss with your husband? And I'm talking about the period before he was re-elected. Re-elected. We talked about whether it could possibly be true. What was your husband's take on it?
2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17	Q Ir A Y Q Q A Q A For al M A C Q W A O Q Is A Y Q A a	res. Correct? Yes. And it was a fact that in January and rebruary voters and contributors were concerned bout an extramarital affair that he was having with Ms. Figueroa; true? Concerned is too strong a word. Well, they were curious. Dikay. So that correct? Yes. And you would agree with me, would you not, that for person of his caliber in his position, that could recome a political problem?	3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18	Q A Q A Q A Q A	Mr. Christofferson? No. Did you inquire with any of the campaign staff about these issues No before he was re-elected? No. Did you ever discuss it, as you sit here under oath, did you ever discuss it with your husband? Yes. What did you discuss with your husband? And I'm talking about the period before he was re-elected. Re-elected. We talked about whether it could possibly be true. What was your husband's take on it? That he didn't think so either.
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2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18 19	Q Ir Q C Q A A A Q A A A C Q A A Q A A A A A Q E	res. Correct? Yes. And it was a fact that in January and rebruary voters and contributors were concerned bout an extramarital affair that he was having with Ms. Figueroa; true? Concerned is too strong a word. Well, they were curious. Dikay. So that correct? Yes. And you would agree with me, would you not, that for person of his caliber in his position, that could recome a political problem?	3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18 19 20	Q A Q A Q A Q A	Mr. Christofferson? No. Did you inquire with any of the campaign staff about these issues No. before he was re-elected? No. Did you ever discuss it, as you sit here under oath, did you ever discuss it with your husband? Yes. What did you discuss with your husband? And I'm talking about the period before he was re-elected. Re-elected. We talked about whether it could possibly be true. What was your husband's take on it? That he didn't think so either. Did you discuss it with any member of Mr. Norquist's staff before he was re-elected? And I'm again
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2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18 19 20 21	Q Ir Q C A Y Q A Q A A C Q W A O Q Is A Y Q C A Y Q A	res. Correct? Yes. And it was a fact that in January and rebruary voters and contributors were concerned bout an extramarital affair that he was having with Ms. Figueroa; true? Concerned is too strong a word. Well, they were curious. Okay. So that correct? Yes. And you would agree with me, would you not, that for person of his caliber in his position, that could recome a political problem? Yes. Sepecially for you in your capacity as a contributor or at least fund raiser? Right.	3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18 19 20 21 22	Q A Q A Q A Q A Q	Mr. Christofferson? No. Did you inquire with any of the campaign staff about these issues No before he was re-elected? No. Did you ever discuss it, as you sit here under oath, did you ever discuss it with your husband? Yes. What did you discuss with your husband? And I'm talking about the period before he was re-elected. Re-elected. We talked about whether it could possibly be true. What was your husband's take on it? That he didn't think so either. Did you discuss it with any member of Mr. Norquist's staff before he was re-elected? And I'm again referring to this rumor, the Norquist-Figueroa rumors.
2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18 19 20 21 22	Q Ir Y Q A A A A A A A A A A A A A A A A A A	res. Correct? Yes. And it was a fact that in January and rebruary voters and contributors were concerned bout an extramarital affair that he was having with Ms. Figueroa; true? Concerned is too strong a word. Vell, they were curious. Okay. So that correct? Yes. And you would agree with me, would you not, that for person of his caliber in his position, that could recome a political problem? Yes. Especially for you in your capacity as a contributor or at least fund raiser? Eight. True? Yeah.	3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18 19 20 21 22 23	Q A Q A Q A Q A Q	Mr. Christofferson? No. Did you inquire with any of the campaign staff about these issues No before he was re-elected? No. Did you ever discuss it, as you sit here under oath, did you ever discuss it with your husband? Yes. What did you discuss with your husband? And I'm talking about the period before he was re-elected. Re-elected. We talked about whether it could possibly be true. What was your husband's take on it? That he didn't think so either. Did you discuss it with any member of Mr. Norquist's staff before he was re-elected? And I'm again referring to this rumor, the Norquist-Figueroa rumors. Ruth Wyttenbach and I may have talked about it.
2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18 19 20 21 22 23	Q Ir Y Q A A A A A A A A A A A A A A A A A A	res. Correct? Yes. And it was a fact that in January and rebruary voters and contributors were concerned bout an extramarital affair that he was having with Ms. Figueroa; true? Concerned is too strong a word. Vell, they were curious. Okay. So that correct? Yes. And you would agree with me, would you not, that for person of his caliber in his position, that could recome a political problem? Yes. Especially for you in your capacity as a contributor or at least fund raiser? Eight. True? Yeah.	3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18 19 20 21 22 23 24	Q A Q A Q A Q A Q	Mr. Christofferson? No. Did you inquire with any of the campaign staff about these issues No. before he was re-elected? No. Did you ever discuss it, as you sit here under oath, did you ever discuss it with your husband? Yes. What did you discuss with your husband? And I'm talking about the period before he was re-elected. Re-elected. We talked about whether it could possibly be true. What was your husband's take on it? That he didn't think so either. Did you discuss it with any member of Mr. Norquist's staff before he was re-elected? And I'm again referring to this rumor, the Norquist-Figueroa rumors. Ruth Wyttenbach and I may have talked about it. What is your recollection as far as your discussion
2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18 19 20 21 22	Q Ir A Y C A A A C A A A A A A A A A A A A A	res. Correct? Yes. And it was a fact that in January and Sebruary voters and contributors were concerned bout an extramarital affair that he was having with Ms. Figueroa; true? Concerned is too strong a word. Vell, they were curious. Okay. So that correct? Yes. And you would agree with me, would you not, that for person of his caliber in his position, that could become a political problem? Yes. Especially for you in your capacity as a contributor or at least fund raiser? Eight. Crue?	3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18 19 20 21 22 23	Q A Q A Q A Q A Q	Mr. Christofferson? No. Did you inquire with any of the campaign staff about these issues No before he was re-elected? No. Did you ever discuss it, as you sit here under oath, did you ever discuss it with your husband? Yes. What did you discuss with your husband? And I'm talking about the period before he was re-elected. Re-elected. We talked about whether it could possibly be true. What was your husband's take on it? That he didn't think so either. Did you discuss it with any member of Mr. Norquist's staff before he was re-elected? And I'm again referring to this rumor, the Norquist-Figueroa rumors. Ruth Wyttenbach and I may have talked about it.

_					Sheet is
1		I Just I think we both found it to be an impossible.	1	Α	No.
2	(Situation? Do you recall, when this conclusion was	2	Q	Or how these rumors regarding the alleged
3		arrived at between Ruth and you, do you recall	3	•	relationship with Ms. Figueroa would affect her?
4		approximately the time period when this discussion	4	Α.	How the rumors would affect her?
5		took place?	5		Yes.
6	ļ	February, March.	6		I wasn't aware of what she knew.
7		Of the year 2000? And just so the record is clear,	7		Did you ever discuss it with her?
8	Ì	can you explain to us who is Ruth?	8		No, absolutely not.
9	I	Ruth is the Mayor's assistant and scheduler.	9		Prior to his re-election, other than the
10		And the last name spells?	10	V	contributors whose names you don't recall, anyone
11		Wyttenbach, W-Y-T-T-E-N-B-A-C-H.	11		else that may have raised that issue during the
12		Boy, I'm testing your recollection right now. Okay,	12		re-election campaign but before he actually was
13		good. I'm going to call her Ruth so I don't	13		
14		massacre her last name. Did Ruth conclude, based on	14		re-elected that may have raised the same issue, the
15		your recollection, did she verbally conclude or	15		allegations of Ms. Figueroa having a relationship with him?
16		opine that she didn't think that this could be	16	Δ	Raised in what way?
17		possible?	17		
18	۸	Yeah.	18		In any way.
19		Is that what she said to you?	19	^	Well, I'm sure my friends did, Marge, you know.
		· · · · · · · · · · · · · · · · · · ·	20	Ų	Prior to his re-election did anyone ever share with
20 21		Yes, yes. Did there come a time before he was re-elected when	21		you any specific evidence about whether or not there
22	ζ.	you actually became concerned about the truthfulness	22	Δ	was an actual relationship going? No.
23		of these rumors?	23		
24	Δ		24		Do you recall whether or not during the re-election
25		No. Is that because of your conviction that you didn't	25		campaign any of the news media, and by that I
123	V	49	25	****	include everyone from the Internet, the web, local 51
	. 3.		ļ		
1		think he would be engaged in something like this?	1.		newspapers, television, you name it, any news media
2		Yes.	2		that may have published anything with respect to
3	•	Is that correct?	3	. 17	these alleged rumors before he was re-elected in
4		Yes.	4	_	2000?
5	Q	Prior to his re-election did anyone from the	5	Α	I don't recall whether anything was published.
6		campaign staff, volunteers as well as paid	6	Q	Do you recall whether or not, and mind you that I
7		individuals, did anyone ever raise the same	7	_	don't know who the players were
8		concerns –	8		Right.
9		No.	9		· · · · · · · · · · · · · · · · · · ·
10	_	prior to his re-election?	10		Right.
11		No.	11	Q	fresh relying on your truthfulness, which I
12	Q	Is there a reason why you didn't give, if you	12		believe you have been, do you recall whether or not
13		didn't, why you didn't give any importance to these	13		the opposition, if there was any, ever raised this
14		rumors before he was re-elected?	14		allegation of an extramarital affair on the part of
15	Α	It's just my perception of the nature of his	15		John Norquist before he was re-elected?
16		personality.	16		I believe they had a press conference.
17		You were just convinced that he would not do that?	17	Q	Is that correct?
18	Α	Right. And my belief, and my affection for his	18	Α	I believe.
19		wife.	19	Q	And who do you know that did that who had the press
20	Q	Are you close to his wife?	20		conference?
21	Α	We're friends.	21	Α	George Watts, I believe.
22	Q	Would you consider her a close friend?	22	Q	Just to tell you how much I know, was George Watts
23	Α	No.	23		the opponent?
24	Q	Did you at any point develop serious concerns about	24		Yes.
25	-	his wife?	25	Q	What is your recollection of that press conference?
		50		-	52
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Cas		ompress Deposition of BARBARA I	\. C	AI	
1		What were the allegations that he was making?	1		Mr. Norquist about these rumors?
2		I don't know.	2		No, no.
3		What's the gist of what you believe he was saying?	3	Q	Prior to his re-election?
4	À	That John was involved with something.	4	Α	No.
5		And something?	5	Q	To this date have you ever discussed this
6	Δ	In some way. I did not pay a lot of attention to	6	`	relationship with Mr. Norquist?
7	Γ	it.	7	Α	No.
6	\circ	When you say something or some way, did you conclude	8		You do know now that the Mayor has come out and
8	Ų	he was referring to an extramarital relationship?	9	`	acknowledged that he had an extramarital
9	٨	The Was referring to an extramation relationship.	10		relationship with Ms. Figueroa?
10	А	I believe so. As I said, I did not pay a lot of	11	Α	Yes.
11	_	attention to it.	12		Correct?
12	Q	Do you recall approximately when this press	13	•	Yes.
13	_	conference occurred?	14		When was the very first time that you learned that
14	Α	It was right before the election, maybe the week	15	Ų	in fact the Mayor was having an extramarital
15	_	before the election.	16		relationship?
16	Q	And is it your sworn testimony, Ms. Candy, that		٨	At the press when he had the press conference.
17		before he was elected you never once discussed it	17 18		Is it your sworn testimony that before he held a
18		with Mr. Christofferson?			press conference with his wife on his side you did
19	Α	No, I didn't.	19		_ 1
20	Q	And did he ever raise any issues of concern	20		not know that Mayor Norquist had in fact engaged
21		regarding these alleged rumors with you?			Right.
22		He, who?	22		in sexual acts with Ms. Figueroa?
23		Mr. Christofferson?	23		Right. Is that correct? When he had the press conference
24		No.	24	•	·
25	·Q	Is it fair and accurate to say and I think you	25	y ^N s	55
		53	ļ		
1		already said this but I just want to make sure that	1		fact, what was your reaction?
2		I am clear on the record. Is it fair and accurate	2		I was horrified.
3		to say that before Mr. Norquist was elected you	3		And why is that?
4		received, or several individuals questioned you on	4		I felt betrayed, let down.
5		this alleged extramarital relationship; is that	5	Ç	Old the fact that the Mayor disclosed this alleged
6		correct?	6	_	behavior or behavior now, it's no longer alleged
7	Α	Yes.	7		Right.
8	Q	And is it fair and accurate to say so I don't	8	(2 did that make you feel bad about all the denials
9	`	torture you on this issue, that's not my intent	9		that you engaged in when people were questioning
10	Α	Okay, okay.	10		you?
11		- is it also fair and accurate to say that you	11		A Bad, stupid, yeah.
12	`	denied that at all times -	12		Q Did you feel that he owed you honesty when you were
13	Α	Yes.	13		generating funds and you were addressing his
14		before he was re-elected?	14		interest to the public of Milwaukee, that he should
15	-	Yes.	15		have come to you and say this is what's going on so
16		So even though you may not remember who may have	16	i	you are aware and you are not being surprised?
17	•	asked you about this extramarital relationship, it's	17		No, I didn't.
18		fair and accurate to say that you were denying it	18	(Q You didn't?
19		all the time?	19) /	A No. Initially, yes.
20	Α	Yes.	20) (Q But you just finished telling us that you felt
21		Is that correct?	21		stupid?
22	_	Yes.	22		A Uh-huh.
23		Before he was re-elected but after you began to hear	23	3 (Q And you're being too harsh on yourself. I don't
24	V	these concerns or questioning about his extramarital	24		I'm just repeating your words.
25		relationship alleged, did you ever actually talk to	25		A Gullible.
120		54			56
L		(608)	25.5	770	Page 53 to Page 5

1	Ç	You felt that way because Mayor Norquist had not	1	Q	Before he became public, when he held that press
2		been honest; correct?	2		conference, do you recall approximately when was
3	Α	Right.	3		that?
4	Q	Other than Marilyn Figueroa, did you ever hear from	4	Α	December.
5		any source about any other rumors involving the	5	Q	Of last year?
6		Mayor and any other woman?	6		2000.
7	Α	No.	7	0	Of 2000?
8		Since the Mayor disclosed his conduct to the public,	8	•	Yes.
9	. `	have you spoken to his wife about these issues?	9		Is that correct?
10	Α	No.	10	-	Yes.
11		Have you had any contact with his wife since he came	11		Were you ever involved in any planning meetings with
12	•	out?	12	•	Mr. Norquist or Mr. Christofferson to address these
13	Α	Yes.	13		allegations just before
14		And is it your testimony that you have never	14	Α	No.
15	~	discussed	15		he became public?
16	Α	Never.	16		No.
17		- these issues with her?	17		Did anyone including Mr. Christofferson ever call
18	-	Never.	18		you and tell you what was going to happen?
19		Did she ever make any comments to you?			No, no, no.
20	-	Never.			How close are you to Mr. Christofferson?
21		About these issues?	21	À	Very:
22		Never.			You are very close to him?
23		Is that in your opinion unusual?			Yes.
24		No.	24		You feel confident that he would be truthful to you?
25		I mean you've been pretty close to Mayor Norquist		ΑÀ	Yes. The production of the same interpolation of the program
		57			59
1		for years; isn't that correct?	1	10	How long have you known him?
2	Δ	Right.	2		I met him when I met the Mayor, 1987.
3		You have had access to his office whenever you need	3		In January, February or March before Mayor Norquist
4	Ų	to?	4	Ų	was re-elected in 2000, if Mr. Christofferson would
5	Δ.	Right.	5		have known about this extramarital relationship,
6		True?	6		would you have expected, given your relationship
7	-	Yes.	7		with Mr. Christofferson, would you have expected him
8		You have generated millions of dollars for	8		to come and tell you?
9		Mayor Norquist?	9	Α	No.
10		Yes.	10		Why is that?
111		Is that correct?	11	-	Because I'd have probably quit.
12		Yes.	12		Do you, based on what you know of
13		You've been loyal to Mayor Norquist?	13	~	Mr. Christofferson, do you think that he would have
14	-	Yes.	14		kept this secret relationship, if he knew about it
15		Yet you didn't feel he was being loyal to you by not	15		he would have kept it secret from his staff, his
16	×	disclosing this information before his re-election,	16		campaign staff?
17		true, since you felt so terrible when you found out	17	Α	Yes.
18		he came out? Is that a yes?	18		And why, what leads you to say that?
19	Α	That's an I don't know.	19		I just believe he would have.
20		Did this discovery about his sexual conduct have any	20		On what basis?
21	~	impact in your relationship with him?	21	•	So we would all keep doing our jobs.
22	Α	I've seen him far less.	22		To this date, do you know if Mr. Christofferson knew
23		Have you built some distrust as a result of this	23	~	of Mr. Norquist's alleged relationship before he was
24	~	disclosure?	24		re-elected in the year 2000?
25	A	No, I wouldn't say that.	25	Α	I believe at some point he did, yes.
[, ,	58			60
<u></u>	D A	TIM REPORTING SERVICE, LLC (608) 2	E 7	700	Page 57 to Page 60

1	$\overline{}$	Before or after?	1		behavior?
1	•	Before or after what?	2	Λ	The behavior.
2					
3		Before Mr. Norquist was re-elected or after?	3	Ų	Do you think that Mr. Christofferson had known about
4		I believe before, but I don't know when.	4		this for years?
5		What leads you to say that?	5		No.
6	Α	He's told me he knew before.	6	·Q	How much time do you think he had to know about this
7	Q	When was the last time that you spoke with him about	7		matter before Mr. Norquist came out?
8		this issue?	8	Α	I don't know.
9	Α	About when he knew and stuff?	9	Q	Do you have any information, Ms. Candy, as to who
10	0	Right.	10		suggested to Mayor Norquist to come out and claim
11	-	Immediately after the press conference.	11		that this was a consensual relationship?
12		What did he tell you?	12	Α	No, no.
13		That he knew at some point.	13		Do you suspect Mr. Christofferson?
14		Where was this discussion held?	14		I don't have any way of knowing.
15	-	I believe it was on the phone.	15		You did not participate in any meetings?
		How did the whole conversation develop over this	16		No.
16	V		17		
17	۸	issue?	18		Of any kind? None.
18	A	Well, I think he felt I was angry at him for not			
19		telling me about it.	19		How long have you been married to your husband?
20		You were angry at Mr. Christofferson?	20		27 years.
21		Yes.	21	Q	Is this the only marriage you ever had?
22		Did you let him know that?	22		Yes.
23		Yes.	23	·Q	Is that right? Your husband, is this the only
24		And what was his response?	24		marriage he ever had?
25	Α	He just didn't think he should. And he was, I	25	Α	Yes.
l		61			<u></u> 63
i					
1		think, was right.	1	Q	Congratulations. I suspect given your sworn
1 2		think, was right. I understand that. But I'm asking you to tell me		Q	Congratulations. I suspect given your sworn testimony today that if anyone knew about this
2		I understand that. But I'm asking you to tell me	2	Q	testimony today that if anyone knew about this
2		I understand that. But I'm asking you to tell me what he told you. Why didn't he disclose that	2 3	Q	testimony today that if anyone knew about this relationship before his re-election, it certainly
2 3 4	Q	I understand that. But I'm asking you to tell me what he told you. Why didn't he disclose that information to you?	2 3 4		testimony today that if anyone knew about this relationship before his re-election, it certainly wasn't you?
2 3 4 5	Q	I understand that. But I'm asking you to tell me what he told you. Why didn't he disclose that information to you? Because he didn't think he should.	2 3 4 5	Α	testimony today that if anyone knew about this relationship before his re-election, it certainly wasn't you? That's right.
2 3 4 5 6	Q	I understand that. But I'm asking you to tell me what he told you. Why didn't he disclose that information to you? Because he didn't think he should. Did he tell you that he had promised Mr. Norquist	2 3 4	A Q	testimony today that if anyone knew about this relationship before his re-election, it certainly wasn't you? That's right. You never learned that from Ms. Figueroa; correct?
2 3 4 5 6 7	Q A Q	I understand that. But I'm asking you to tell me what he told you. Why didn't he disclose that information to you? Because he didn't think he should. Did he tell you that he had promised Mr. Norquist not to disclose it?	2 3 4 5 6 7	A Q A	testimony today that if anyone knew about this relationship before his re-election, it certainly wasn't you? That's right. You never learned that from Ms. Figueroa; correct? No.
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1		But did you ever work, other than Marilyn Figueroa,	1	0	Tell me some of the complaints that she shared with
2		did you ever work with any of his staff members at	2	~	you.
3		any point for any reason?	3	Α	That there was a, predominantly there was an inner
4	Α	Can you define worked?	4	•	circle of people and then there was those not in
5		Worked meaning that they did work for you, they sent	5		that inner circle of people. And that was a
6	~	you emails, you used their office?	6		changing, depending on whom, who was there.
7	. Д	You mean help in the campaign?	7	Ω	And how did she describe this separation or
8		Correct.	8	~	differences?
9	•	Yes.	9	Δ	On staff level I believe.
10		And would that include all of the staff members?	10	′`	MR. SCHRIMPF: I'm sorry, I didn't
111	-	You mean over all the years?	11		hear.
12		Correct.	12		THE WITNESS: On staff level. You
13	•	No, not all of them.	13		know, there was the senior staff and then
14		Most of them?	14		there
15	-	Some of them. Some of them aren't interested.	15	0	Do you recall ever hearing Marilyn Figueroa
16		Mr. Soika, was he involved in the political	16	V	strike that. When she was sharing with you these
17	Q	re-election of Mr. Norquist?	17		concerns about the inner circle, did you take that
18	Δ	Not on my part.			as some sort of a complaint or something that she
19			19		didn't like the way things were inside the office?
20			20 =		
21		Did you have much contact with Mr. Soika?			Is that correct? Do you recall during – did she
22					make that known to you several times?
23					Yes. The west of the second times:
24	ν.	going out to lunch, doing things together?			Is that correct? Do you recall any one time when
25	Α	We may have gone out to lunch, have a drink.	25		Marilyn Figueroa used the word the Hispanic box or
120	. 7 3	65	-		67
+					
1	. Q	Do you recall any one time before January of 2000	1	A	the Spanish box within the Mayor's office?
2	1	when Marilyn Figueroa may have shared with you			To me?
3		complaints about not being reclassified at work?	3		Yes. In a path exploration of markets and a
4	А	No, I don't recall if we ever talked about that. I	4		No.
5		don't think so.	5 6	Ų	When she was complaining to you about the inner
6	Ų	Do you recall sometime in 1998 when Ms. Figueroa	7		circle, did she identify some of this circle as the
7		kind of left, quit the job? Do you remember ever	8	٨	minority versus the nonminority group? I don't think so. I don't recall.
8	۸	talking to her?	l .		
9		No.	9	Ų	What exactly did you conclude or what exactly did
111	Q	Ever calling her and asking her to come back to	11		you perceive she was complaining about when she
12	٨	work? No.	12		mentioned to you the inner circle dynamics within
13			13	٨	the Mayor's office? I think I don't understand the structure of how
	Ų	Ever telling her that you felt she was a good	14	^	I think I don't understand the structure of how
14	٨	worker?	15		the City government works and these classifications
15		No.	16		and stuff. I don't know anything about this, but I
16	Ų	Do you recall ever hearing from Ms. Figueroa	17		think people with higher classifications and larger
17		complaints about discrimination within the Mayor's		\sim	salaries had more access, more power.
18	٨	office with respect to committees, input, et cetera?	18	Ų	Did she ever complain to you did you ever
19		No. You mean technical discrimination?	19		perceive that she was complaining as a woman, as a
20	-	Correct.	20		Hispanic, as a minority? Did you ever perceive that
21		No.	21	٨	to be the case?
22	Q	Do you recall any complaints of any nature that	22		No, no.
23		Marilyn Figueroa may have shared with you throughout	23	Ų	When Marilyn Figueroa was doing political
24	Λ	the years since you have known her?	24		campaigning for Mayor Norquist, to your knowledge,
25	A	We've had many conversations, yes, I'd say.	25		was she getting paid from the political campaign or
		nh .	1		68

case	3 0	ompress Deposition of BARBARA F	0		
1		was she getting paid from the City? If you know.	1		the troops were going full steam and working hard?
2	Α	I don't know for sure. She was supposed to be	2	Α	December I would say.
3		getting paid, starting to get paid from the campaign	3	Q	That would have been December?
4		part-time. But I don't know if that ever happened.	4	Α	Yes.
5	0	And again, if I need to get those records, those	5	Q	And I suspect November was kind of picking up as
ô	V	records don't belong to the City? The political	6		well?
7		campaign records do not belong to the City?	7	Α	Right.
	٨	They're filed at the elections commission at the	8		Is that right?
8	Δ	··· -	9	-	Right.
9	^	City. As to who was working on the political campaign?	10		Do you recall ever observing Marilyn Figueroa either
0			11	~	in November or December based on your observation,
1	A	Yes, yes.	12		your way of looking at things, as stressed out,
2	Q	Okay, thank you. Do you recall in the year of 2000	13		upset?
3		and the preceding year late 1999, do you recall	14	Δ	Yes.
4		working with Marilyn Figueroa on the political	15		Okay.
5		re-election campaign?	16	•	Yes.
6	Α	Yes, yes.			
7	Q	Did you have constant contact with Ms. Figueroa?	17	Ų	Did you ever see Marilyn Figueroa during any of
8	Α	Not constant but we were working on some stuff.	18		those two months crying or having any type of
9	Q	In 1999, December to be more exact	19		discomfort -
0		Yes.	20		No. 110 D. 110 D
1	Q	did you have any contact with	21	Ų	- at all? Do you recall anytime when
2		Ms. Marilyn Figueroa?	22		Marilyn Figueroa would not make it to meetings or
3		Yes.	23		would not come because of stress, what you perceived
4		What about November of 1999?	24	_	to be stress?
25	Α	I think we were at some meetings.	25	·A	I wouldn't I wouldn't, no, not from my
		69			71
1	• Q	Political campaign meetings?	1	Q	When you testified that it was your perception that
2	Α	Right, right.	2		Marilyn Figueroa was under a lot of stress, how
3	· Q	Is that correct? Was Marilyn assigned to any	3		would you characterize that? How did you reach that
4		specific section of the political campaign staff?	4	_	conclusion? On what basis?
5	·A	I think she was supposed to be doing organizing and	5	Α	We had a meeting, and then we talked afterwards and
6		stuff.	6		she seemed upset.
7	Q	Was she assigned to a specific group, Hispanic or	7	Q	And did you ever exchange any opinions as to what
8		anything?	8		was making her upset?
9	Α	I don't know.	9	Α	We talked about it. We talked about the campaign.
0		But the only specific fund raisers that you remember	10		There were people in the campaign that neither she
1	`	she was assigned to were the ones that you mentioned	11		nor I were wild about working with. And that's
2		earlier	12		what.
3	Α	Right.	13	Ç	Did she complain about again the inner circles of
4	0	right after you were sworn? The one with the	14		the Mayor's campaign?
5	~	Hispanic community, the Afro-American community, the	15	A	No, no, no, no.
6		Indian community; is that correct?	16		Do you recall any one time when Ms. Figueroa went
17	Δ	Yes, yes.	17		home upset suddenly because of stress or abdominal
8		I know, I know. That's the joy of a lawyer, to	18		pains, discomfort?
	Ų	catch the witness nodding, you know. I mean it's a	19	Α	No.
19		powerful way to say you've got to answer yes or no.	20		In November and December did you have any slight
20		powerful way to say you've got to allower yes of no.	21	•	idea that there were some rumors about
21		All right. Let's talk about 1999. Are you	22		Mayor Norquist and Figueroa?
22		able to tell me what period of time, keeping in mind	23	,	No.
23		that the political campaign re-election would end in			November or December?
24		March of 2000 or so, what aspect of those months was	24		No, uh-uh.
25		the busiest time of the political campaign or where	25	•	72
		70	i		14

_	_				oncer is
1	(Oo you have any recollection as to when	1	Α	It just I don't know. I don't recall very
2		Marilyn Figueroa stopped working for the City?	2		clearly the conversation. I was quite concerned
3	F	No.	3		about Marilyn.
4	(Did you learn that in January did you learn in	4		You were quite concerned?
5		January that Marilyn Figueroa had walked out of the	5	Α	Yes.
6		job?	6	Q	Why is that?
7	P	Yes.	7	Α	Well, because I wanted her to come back. I liked to
8	() How did you learn that?	8		work with her.
9	P	I learned that she wasn't there from the Mayor.	9	Q	And I should say even though this is not part of
10	(The Mayor told you that?	10		this case, she feels the same way, okay? But in any
11		Yes.	11		event, you were concerned about Marilyn?
12	() Where did he tell you this?	12	Α	Yes.
13		In my office.	13	Q	What was raising those concerns, if anything? What
14		Where is your office?	14		were you concerned about Marilyn?
15		My office is on Marshall Street.	15	Α	The last, the time I saw her, the last time I saw
16		He came to visit?	16		her was a few days before Christmas when we had this
17		He came there. I mean that's where we worked.	17		meeting, and as I said, she was upset. The event we
18		He was visiting on a regular basis?	18		were working on was in the second week I believe of
19		Yes.	19		January and I did not know the people. She knew the
20	*	And where did this conversation occur, right in your	20		people. And all of a sudden she was gone. And I
21		main office where your desk is located?	21		didn't know what had I didn't know what had
22	Α	Right.	22		happened to her, whether she was coming back and
23		Is that correct?	23		working on this or what.
- 1		I should clarify. This is his fund raising office.	1		Let me ask you to assume that Marilyn Figueroa
25		This is Citizens for Norquist fund raising office.			walked out on January the 4th of the year 2000. How
		73	1		75
-					
11 4	\sim	747	1 4		Conduction at 111 and 1
1	•	Where is that located?	1		soon after that January 4th did the Mayor come and
2	A	819 Marshall.	1 2	Λ.	talk to you?
2 3	A Q	819 Marshall. And how did the issue get raised?	3	Α	talk to you? The Mayor generally is with me every morning, was
2 3 4	A Q	819 Marshall. And how did the issue get raised? It got raised because I asked about Marilyn because	3		talk to you? The Mayor generally is with me every morning, was during that re-election campaign.
2 3 4 5	A Q	819 Marshall. And how did the issue get raised? It got raised because I asked about Marilyn because we were working on this stuff and I couldn't find	3 4 5		talk to you? The Mayor generally is with me every morning, was during that re-election campaign. So is it possible that he came to see you on the
2 3 4 5 6	A Q A	819 Marshall. And how did the issue get raised? It got raised because I asked about Marilyn because we were working on this stuff and I couldn't find her.	3 4 5 6	Q	talk to you? The Mayor generally is with me every morning, was during that re-election campaign. So is it possible that he came to see you on the 4th?
2 3 4 5 6 7	A Q A	819 Marshall. And how did the issue get raised? It got raised because I asked about Marilyn because we were working on this stuff and I couldn't find her. What did you say?	3 4 5 6 7	Q A	talk to you? The Mayor generally is with me every morning, was during that re-election campaign. So is it possible that he came to see you on the 4th? Yes.
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2 3 4 5 6 7 8 9	A Q A	819 Marshall. And how did the issue get raised? It got raised because I asked about Marilyn because we were working on this stuff and I couldn't find her. What did you say? I asked him, you know, what happened, where was she, you know.	3 4 5 6 7 8 9	Q A Q A	talk to you? The Mayor generally is with me every morning, was during that re-election campaign. So is it possible that he came to see you on the 4th? Yes. The same day she left? Yes.
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1	Q	I don't know him.	1		that Marilyn had some type of nervous breakdown?
2	-	Okay.	2	Α	I don't think I was aware of that at the time at
3		I have never met him.	3		all.
4	À	Okay. He just was not real forthcoming and didn't	4	Q	Did there come a time when you did become aware of
5	•	want to talk about it I think is the best way.	5		that fact?
6	Ο	I'm trying to imagine your description of the way he	6	Α	Much later.
17	V	is, but I have to ask you this question. When he	7	Q	Meaning how many months?
8		related to you that Marilyn had left the job because	8		I can't even say. I don't know. I don't remember.
9		she was upset about the job and did not know if she	9		and the state of t
10		was coming back, how would you describe his demeanor	10	`	fair and accurate to say that the way you learned
11		as he was telling you that?	11		about Marilyn leaving the job was rather abrupt;
12	Δ	Perfectly normal.	12		correct?
13	0	Normal. Do you know up to that time did you know	13	Α	Yes.
14	Ų	for how long Marilyn had worked for John Norquist?	14	Q	And did you form any ideas or questions what's going
15		Do you know how many years she had been	15	`	on here after the Mayor informed you that she had
16	Δ	I think she came in 1992 after that election	16		left the job?
17	$\overline{}$	campaign.	17	Α	Not that I recall, not that I recall.
18	Λ	Were you surprised that a person that had been	18		You mentioned that before he was re-elected in 2000,
19	V	working there for close to 10 years all of a sudden	19		January, February when people began to question this
20		the Mayor was telling you she may not come back?	20		behavior on the part of the Mayor, I believe you
21	Α	No, because I think she had issues with, in there.	21	:	testified that and I want to give you the
22	$\hat{0}$	And the issues that you believe she had related to	22	:	opportunity to clarify this. I heard you to say
23		what?	23		that you never questioned the Mayor before he was
24		The job.	24		re-elected.
25		The job?	25	Α	Right.
	•	77			79
1	Δ	Yes.	1	0	Was that important to you at all, to know whether or
2		Other than did that issue ever get raised again	2		not the man that you were generating thousands of
3	V	between you and the Mayor?	3		dollars was engaged in an extramarital relationship?
4	Δ	No.	4		Was that important at all to you?
5		The fact she was gone?	5	Α	No, no.
6		No.	6	Q	So can you tell me, Ms. Candy, how you reconciled
7		Did there come a time at some point that you learned	7		I mean you are vividly upset about all of this;
8	•	that Marilyn Figueroa was hospitalized?	8		true?
9	Α	I think so.	9	Α	Yes.
10	0	How soon after she left that you learned that she	10	Q	Is that true?
11	•	had been hospitalized?	11	Α	Yes.
12	Α	In January.	12	Q	Can you tell me how you reconciled being so upset
13	0	Now, you testified that it was customary, or at	13		about finding out that he was having an extramarital
14	•	least the practice that the Mayor would come and see	14		relationship or he had engaged in sexual conduct
15		you every morning. How did you learn that she was	15		outside the house and never having questioned him
16		hospitalized? Did the Mayor share that information	16		about that?
17		with you as well?	17	Α	You have to understand that I didn't believe he did
18	A	No.	18		it.
19	0	How did you learn that fact?	19	Q	So it was not that you were playing I don't want to
20	À	I don't know. I don't remember.	20		know; you just were convinced that this man would
21	0	Well, did you ever ask the Mayor in one of your	21		not do that?
22	•	meetings what's going on with Marilyn, why is she in	22		Right.
			23	C	Is that correct?
		the hospital?		~	2 15 mar correct:
23	Α	the hospital? No.	24		Right.
	A O	the hospital? No. Did there come a time when you learned at some point			

[4		1.	1		1 1 1 0
		record for a minute.			that he knew?
2		(Discussion off the record)	2		Yes.
3		(Last two questions and answers read)	3	Q	Did he ever tell you for how long he had known about
4	Q	Now, let's talk about after his re-election which	4		these rumors?
5		would have been February, March of the year 2000; is	5	Α	No.
6		that correct?	6	Q	Did you ask him how long have you known about this?
7	Α	After?	7		No.
8	0	Right.	8	Q	Here's my question to you. When did you actually
9		It was April of 2000.	9	`	talk to Mr. Christofferson about what he knew?
10		In other words, he was re-elected sometime in April?	10	Α	You mean this conversation?
11		April, yes.	11		Correct.
12		Now, and you also are aware by virtue of your prior	12	•	It would either have been the weekend after the
13	~	sworn testimony, that Mr. Norquist decided to, at	13	•	press conference or at the beginning of the next
14		least in his view, disclose this relationship with	14		week.
15		Ms. Figueroa was a consensual relationship sometime	15	0	Okay. So did you ever bring any of these
16		in December of 2000; correct?	16	Y	allegations to the attention of Mr. Christofferson
17	Δ	Yes.	17		before December, before Mr. Norquist had his press
18		And again, I believe your testimony before this	18		
19	Ų	morning was that that was the first time that you	19		conference where he acknowledged the relationship? Did I tell Bill about the rumors?
20	٠.	actually learned that there was in fact some type of	20		Right.
21			21	-	No. 2 and Addition and the state of the stat
22	٨	sexual exchange with Ms. Figueroa and Mr. Norquist? Yes.	22		
					Did you ever tell anybody other than your husband?
23	Ų	Is that correct? Now, after April of 2000, after he	23		Well, the people I worked with.
24 25		was elected, did anyone ever raise these alleged	24		Who, for example? Who did you talk to?
20		rumors of his sexual relationship between	25	A	About the rumors?
L		81			83
1		Mr. Norquist and Ms. Figueroa but before December,	1		Right:
2		before he came out and disclosed himself?	2	Α	My husband, people, Ruth, people like that.
3	Α	Raise them?	3	Q	
4	Q	With you.	4		change their opinion about these rumors before
5	Α	Certainly. The rumors continued all summer and all	5	,	December of 2000 when the Mayor became public with
6		fall.	6		it?
7	Q	And did you ever change your position at all before	7	Α	I don't know. Not Ruth I know.
8		he came out and disclosed it on December, whenever	8	Q	Did there come a time before December, before
9		that was?	9	•	John Norquist decided to come out and acknowledge
10	Α	No.	10		that, did there come a time when these rumors
11	0	You continued to deny	11		increased? Let's talk about fluctuations here.
12	-	I continued to deny.	12	Α	Not to my knowledge.
13		that these rumors were true? From April of 2000	13		Are you familiar with a person by the name of
14	~	after he was re-elected but to December before he	14	*	Marge Beil?
15		came public, did you ever talk to Mayor Norquist	15	Α	Yes.
16		about these rumors?	16		Who is Marge Beil?
17	Δ	No.	17		She's a community activist who works at LaCasa.
18		Did you ever talk to Mr. Christofferson	18		
19		No.	19	Y	How long have you known Ms. Beil? Am I pronouncing
20		about these rumors?	20	Δ	her last name properly?
21					Since, oh, I don't know, 1992 maybe, 90.
		No.	21		Have you worked on projects together?
22	Ų	You did state that at some point you spoke to	22		Yes.
23	٨	Mr. Christofferson –	23		Did she work on political campaigns with you?
24		Right.	24		Yes, yes.
25	Ų	about these rumors and that he confided in you	25	Q	Is it fair and accurate to say that you have known
1		82	<u> </u>		84
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-		compress Deposition of British			
1		her for at least 10 years?	1	Q	Tell me what's your recollection. Let's talk about
2	Α	Yes.	2		the month or the period of time.
3	Q	Or more?	3	Α	Well, I have lunch with Marge.
4	_	Yes.	4	Q	Countless times?
5		Is that correct? Have you ever known Ms. Beil to	5	À	Countless times in 2000. Are you asking about the
6	•	lie or have a reputation of dishonesty?	6		December lunch?
7	Δ	I've known her to embellish.	7	0	Well, anytime when you may have discussed
8		But have you ever known anyone to claim that she has	8	•	Mr. John Norquist but before Mr. Norquist came
9	V	the tendency to lie as opposed to embellish?	9		public.
	٨	·	10	Δ	I don't remember specifically.
10		No.	11		But you do recall talking to her about
11	Q	With respect to embellishing, tell me some specific	12		Yes.
12		illustrations, if there are any, that would support	13		
13		your contention that Ms. Beil tends to embellish.			1 0
14	A	I can't think of specific things. She is dramatic.	14		Yes, yes.
15	Q	Do you know any men in your life who tend to be	15	Ų	And you recall talking to her before Mr. Norquist
16		dramatic?	16	٨	became public?
17		Certainly.	17		Yes.
18	-	How would you characterize Mr. Norquist?	18		And what was the nature of your discussion?
19		Not dramatic.	19	А	She obviously believed Marilyn and I obviously
20		Do you consider him emotional?	20		believed the Mayor, so we argued about those things.
21		No	21	Q	You took the position that you didn't believe
22		Do you consider him harsh?	22		Marilyn's complaints and allegations; is that
23		Harsh? Sometimes.	23		correct?
24	Q	Have you ever known anyone that has complained about	24	Α	This was not about Marilyn in my mind. This was
25		Mr. Norquist's retaliatory conduct?	25		about John.
		85			87
· L		344			
1	Α	Yes.	1	Q	
1			1 2		Right. Inversely Right, right.
1 2 3		What types of complaints have you heard regarding	1 2 3	Α	Right. Inversely
2	Q	What types of complaints have you heard regarding his retaliatory conduct?	1 2 3 4	Α	Right. Inversely Right, right.
2 3 4	Q	What types of complaints have you heard regarding his retaliatory conduct? I think that if you do something he doesn't like,	1	Α	Right. Inversely Right, right. Well, let me rephrase it. I understand the context
2 3 4 5	Q A	What types of complaints have you heard regarding his retaliatory conduct? I think that if you do something he doesn't like, you can get on the wrong side of him.	4	Α	Right. Inversely Right, right. Well, let me rephrase it. I understand the context that you're giving me in your question. Your answer
2 3 4	Q A	What types of complaints have you heard regarding his retaliatory conduct? I think that if you do something he doesn't like, you can get on the wrong side of him. Has this Figueroa-Norquist situation in any way	4 5	Α	Right. Inversely Right, right. Well, let me rephrase it. I understand the context that you're giving me in your question. Your answer is that you were not really questioning Marilyn, but
2 3 4 5	Q A Q	What types of complaints have you heard regarding his retaliatory conduct? I think that if you do something he doesn't like, you can get on the wrong side of him. Has this Figueroa-Norquist situation in any way affected your trust in Mr. Norquist?	4 5	A Q	Right. Inversely Right, right. Well, let me rephrase it. I understand the context that you're giving me in your question. Your answer is that you were not really questioning Marilyn, but you were focusing on whether or not John would be engaged in something like this; is that correct?
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	1		Did you ever talk to her on the phone?	1	Q	Did you at some point later on?
	2	Α	I don't recall.	2	Α	Yes.
	3	0	What about after Mr. Norquist became public? Do you	3	0	Tell me when was the next time that you talked about
	4	`	recall touching bases with Ms. Beil?	4	•	that.
\$	5	Α	Yes.	5	Α	I think I saw her the next week and we talked about
	6		Tell me the nature specifically to address the	6	′`	this.
	7	V	Norquist-Figueroa thing? Is that yes?	7	Ω	
	8	٨		8		Where did you talk to her?
	1		Yes.			At Ms. Katie's Diner.
	9		She needs your answer.	9		Tell me the nature of the discussion.
	10		Yes.	10	Α	I just felt betrayed and unhappy, and we talked
	111	Q	Tell me what was the nature of your contact with	11		about that.
	12		Ms. Beil after Mr. Norquist became public.	12	·Q	If Ms. Beil were to testify that you sent an email
	13	Α	I think that I called her immediately when I'd heard	13		stating how upset you were at Mr. Norquist because
	14		Marilyn went to the hospital and said did you know	14		he had lied to you, would that be out of the
	15		Marilyn went to the hospital. I think that was my	15		question?
	16		first contact.	16	Α	No. But I don't
	17	Q	Do you recall approximately when that would have	17	Q	You were upset?
100	18	11,33	been, when that call would have been made?	18	Α	I don't recall sending emails.
1241	19		I don't remember. That was a stressful weekend for			But nevertheless you were upset?
	20		me. No, I don't remember exactly. But it was as	1	-	Terrifically upset, yes.
1	21	4	soon as when I heard it on the news.			You felt he had lied to you?
3.5	22	Ω	And was that after the day when the Mayor became			Yes for the far powers of the poster of the content of
	23		public?	3		Were you at all surprised to learn that strike
	24		I believe so. That's my recollection, but I			that. Before the Mayor became public did you recall
1 1 1 1 1 1 1 1 1 1 1 1 1 1 1 1 1 1 1	25		Did you call Marge or did she call you?	25		reading any articles or information through the
	23	·V	89	23	÷	91
			. 00	i		91
ويؤ واللواف	25,000		and the second of the second o			
e e die de Georgia	1		I called Marge.	1		media, any source of media about the fact that
e ja jara jara jara jara jara jara jara	1 2		I called Marge. To let her know that you had become aware that	2	1. (Ms. Figueroa had filed a complaint with the EOC?
e de de la fina de de de de de de de	1.0			2	1. (
	2	Q	To let her know that you had become aware that	2	: : A	Ms. Figueroa had filed a complaint with the EOC?
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—	i	Λ.	V	1	0	in trying to determine how to deal with the
			Very vaguely.	2	-	press?
2		Ų	In fact, I think that if I can put things in proper			Press: No.
3			perspective, I would assume or submit to you that	3		·
4	4		the hospitalization of Marilyn occurred not when the	4		Is that correct? Was Mr. Christofferson, based on
5	5		Mayor went public	5		your knowledge of how Mr. Norquist worked, his
	3	Α	Okay, okay.	6		re-election campaign, was Mr. Christofferson the
•	7	0	but when the actual complaint and the specific	7		person assigned to deal with the press in most
t	8	`	allegations were made public by Mr. Norquist.	8		cases?
	9	Α	Okay.	9	Α	In most cases.
•	0		Do you recall that?	10	Q	Is that right? Okay. It is also my perception,
1	11		Yes.	11	•	based on your representation today, that somehow for
	2		So putting it chronologically, putting it together	12		whatever reason you were kept out of the loop with
	3	Ų	in proper context, is it fair and accurate to say	13		respect to this little secret?
			that before he came out publicly with his version of	14	Α	I did not know about it.
	14		that before he came out publicly whithis version of	15	-	And I don't mean to belittle it when I say little
•	15		a consensual relationship, you already had heard in	16	V	secret, but certainly you were kept out?
	16		the media that Marilyn had filed the first	17	٨	
1	17		complaint?			That's right. As you sit here giving us this truthful testimony,
	18		I believe so, yes.	18	Ų	
	19	•	Is that correct?	19		did you ever request to be kept out, not wanting to
12	20		I believe so.	20		get involved
	21	Q	Did you reach any conclusions, opinions as to why	21		No.
12	22		the Mayor waited until after Marilyn had filed the	22	Q	in any of these rumors? Do you have any reason
12	23		complaint to go public with his version?	23		to believe that others within the campaign
12	24		No.	24		organization were also kept out of the loop other
12	25	·Q	To this date did you reach any conclusions as to his	25		than you?
			93		v r	<u> 95 </u>
-	1		timing?	1	Α	You mean the paid campaign?
1	2	Δ	No.	2		Correct, correct.
	3		Did anyone ever tell you or share with you any	3	•	None of us knew.
١		V				
	4 5		stratogy of what was being done?	4		And what leads you to say that?
1		٨	strategy of what was being done?	4 5	Q	And what leads you to say that? Having talked to the people in the campaign after
1			No.	5	Q	Having talked to the people in the campaign after
	6		No. To your knowledge, was Mr. Christofferson involved	5 6	Q A	Having talked to the people in the campaign after December, after his press conference.
	6 7	Ç	No. To your knowledge, was Mr. Christofferson involved in the planning of all these press conferences?	5 6 7	Q A	Having talked to the people in the campaign after December, after his press conference. Who did you talk to?
	6 7 8	Ç A	No. To your knowledge, was Mr. Christofferson involved in the planning of all these press conferences? In December?	5 6 7 8	Q A	Having talked to the people in the campaign after December, after his press conference. Who did you talk to? Michelle.
	6 7 8 9	Q A Q	No. To your knowledge, was Mr. Christofferson involved in the planning of all these press conferences? In December? Yes.	5 6 7 8 9	Q A Q	Having talked to the people in the campaign after December, after his press conference. Who did you talk to? Michelle. Who else? Nobody else?
	6 7 8 9 10	A	No. To your knowledge, was Mr. Christofferson involved in the planning of all these press conferences? In December? Yes. I don't know.	5 6 7 8 9	Q A Q A	Having talked to the people in the campaign after December, after his press conference. Who did you talk to? Michelle. Who else? Nobody else? The paid? No.
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	6 7 8 9 10 11 12 13 14 15 16 17 18 19 20 21 22 23	A C A C A C A C A C A C A C A C A C A C	No. To your knowledge, was Mr. Christofferson involved in the planning of all these press conferences? In December? Yes. I don't know. Would this be something that he would be involved in based on what you know of him? I don't know what — I truly don't know what his involvement was at that point. And I don't want to place you in a difficult legal predicament here, but I sense from the representations you have made here today that you did not participate in any strategy meetings on how to deal with these rumors? That's right. Is that accurate? That is accurate. I will not find later on that you were at some of	5 6 7 8 9 10 11 12 13 14 15 16 17 18 19 20 21 22 23	Q A C A C A C A C A C A C A C A C A C A	Having talked to the people in the campaign after December, after his press conference. Who did you talk to? Michelle. Who else? Nobody else? The paid? No. What was Michelle's reaction when you spoke to her about these issues? We were both stunned. I don't mean to be sexist, but it appears to me that the boys knew and the females, women, professional females were somewhat kept out. Am I getting the proper picture here or an accurate representation? I don't know who knew. Well, one thing is clear is that Michelle did not know? Right. Is that correct? You did not know; correct? Right.

				Office 20
1	Q Your husband didn't. But your husband was not one	1	АТ	hat was not my experience with her certainly.
2	of the paid individuals according to your prior	2		hat was not?
3	testimony?	3	ÀN	No. She was a truthful individual.
4	A Right.	4		Do you recall prior to the disclosure of the
5	Q Is that correct?	5		omplaint we're talking about the disclosure that
6	A Right. Michelle is very young though, I mean.	6		gain John Norquist advanced to the newspapers.
7	Q How young? Young as me?	7	ΑΫ́	
8	A No. 25 maybe at this point.	8		
9	Q She's just a little younger, okay. Is she still	9		Oo you recall any one time when anyone that you know
10	working for the campaign?	10		If that was associated in any manner with
11	A As I said, she works for Senator Chvala.	11		Marilyn Figueroa, do you recall anyone ever
12		12		ortraying or claiming that Marilyn Figueroa was not
13	Q Yes, you did say that. Is she not involved in the	1		truthful individual?
	Norquist campaign anymore?	13		Not with the people I dealt with.
14	A Not at all, not at all.	14		before this entire matter became public, how would
15	Q Do you know anyone that left the campaign upset or	15		ou have described Marilyn Figueroa in her way of
16	disappointed as a result of this entire matter?	16		onducting business?
17	A No.	17		n her City job?
18	Q Did you at any point after the complaint was made	18	QïY	
19	public by John Norquist, and I'm talking about the	19		did not see a lot of that, but from what I did
20	complaint filed by Ms. Figueroa, did you ever read	20		vith Marilyn, she was incredibly competent and she
21	the complaint?		d	lid incredibly well with the stuff she did with me.
22	A No. of the second of the sec	22		MR. ARELLANO: We can take a break
23	Q Did you ever read the newspaper article where the			now. Off the record.
24	complaint was published?			(Discussion off the record)
25		25	<u>.</u>	(Noon recess)
•	97			99
1	Q Well, I want to understand that. You read it or you	.1	В	y Mr. Arellano: (Continuing)
2	didn't?	2		As. Candy, let's go back to the time when
3	A I skimmed it,	3		Ar. Norquist in January of 2000 informed you that
4	Q The newspaper, the local newspaper printed the	4		As. Figueroa had left the job and did not know if
5	entire complaint; isn't that true?	5		he was returning. Shortly after that encounter did
6	A I know. I believe so.	6		here ever come a time when you learned that
7	Q Is that the one that you skimmed?	7		ometime during the month of January and/or
8	A I believe so.	8		Sebruary of the year 2000 Marilyn Figueroa was
9	Q You testified earlier that you were seriously	9		ospitalized?
10	affected by this particular matter?	10		don't remember when. I was aware.
11	A Yes.	11		low did you come to know this fact that she was
12	Q Correct? Is there a reason why you decided not to	12		ospitalized?
13	read it?	13		don't know.
14	A I found it very unpleasant.	14		Did Mr. Norquist ever share that information with
15	Q What did you find unpleasant?	15		ou?
16	A I find the whole situation unpleasant.	16	ΑN	
17	Q Did you get at least to read some of the allegations	17		
18	A COUNTRY OF THE OF THE OF THE OF THE STREET AND TH			Did you learn that fact from people within the City?
		10	ים א	Porhona I don't recell
	played by Ms. Figueroa?	18		Perhaps. I don't recall.
19	played by Ms. Figueroa? A Did I?	19	Q M	Mr. Christofferson?
19 20	played by Ms. Figueroa? A Did I? Q Yes. Did you get to read those aspects?	19 20	Q M A N	Mr. Christofferson? No.
19 20 21	played by Ms. Figueroa? A Did I? Q Yes. Did you get to read those aspects? A Some of them.	19 20 21	Q M A N Q M	Mr. Christofferson? No. Mr. Soika?
19 20 21 22	played by Ms. Figueroa? A Did I? Q Yes. Did you get to read those aspects? A Some of them. Q Since you have known Ms. Figueroa in all of the	19 20 21 22	Q M A N Q M	Mr. Christofferson? No. Mr. Soika? No.
19 20 21 22 23	played by Ms. Figueroa? A Did I? Q Yes. Did you get to read those aspects? A Some of them. Q Since you have known Ms. Figueroa in all of the years, do you recall any one time when you and/or	19 20 21 22 23	Q M A N Q M A N Q Is	Mr. Christofferson? No. Mr. Soika? No. s there a reason why you don't remember how you
19 20 21 22 23 24	played by Ms. Figueroa? A Did I? Q Yes. Did you get to read those aspects? A Some of them. Q Since you have known Ms. Figueroa in all of the years, do you recall any one time when you and/or others felt that Marilyn Figueroa was not a truthful	19 20 21 22 23 24	Q M A N Q M A N Q Is	Mr. Christofferson? No. Mr. Soika? No. s there a reason why you don't remember how you earned of that fact?
19 20 21 22 23	 played by Ms. Figueroa? A Did I? Q Yes. Did you get to read those aspects? A Some of them. Q Since you have known Ms. Figueroa in all of the years, do you recall any one time when you and/or others felt that Marilyn Figueroa was not a truthful individual? 	19 20 21 22 23	Q M A N Q M A N Q Is	Mr. Christofferson? No. Mr. Soika? No. s there a reason why you don't remember how you earned of that fact? s there a reason? I don't recall.
19 20 21 22 23 24 25	played by Ms. Figueroa? A Did I? Q Yes. Did you get to read those aspects? A Some of them. Q Since you have known Ms. Figueroa in all of the years, do you recall any one time when you and/or others felt that Marilyn Figueroa was not a truthful	19 20 21 22 23 24	Q M A N Q M A N Q Is	Mr. Christofferson? No. Mr. Soika? No. s there a reason why you don't remember how you earned of that fact?

1	Q	What did you learn with respect to that incident?	1	P	\]	I had no understanding.
2		Go ahead.	2	()	Did there come a time when you learned that the City 👍
3	Α	That she was in the hospital.	3		t	terminated her employment?
4		And what else, if anything, did you learn as to why	4	P	١.	No.
5	•	she was in the hospital?	5	() .	Anyone ever talk to you about that fact?
6	Α	I didn't learn anything. I didn't know if it was	6		-	No.
7	, ,	because she had had previous physical health	7			Mr. Christofferson never talked to you about that
8		problems. I had no awareness it was not a physical	8		•	fact?
9		problem.	9	ļ		No.
10	Λ	Even though you don't recall the specific source, is	10			Did you visit the office of the Mayor regularly?
11	Ų	it fair and accurate to say that you learned it from	11		-	In what period of time?
12		someone within the City?	12			In January or February of 2000.
	۸	No, not necessarily.	13		-	No.
13		Well, you're pretty firm about that?	14			By the way, did Ruth ever, Mayor Norquist's
14	_	•	15	`		administrative assistant, ever inform you that
15		Right. Yet you don't seem to recall who or where?	16			Marilyn was in the hospital?
16 17		It could have been somebody with the City. I just	17	,		No.
18	^	don't know.	18			You learned that she was in the hospital, but your
19	Ω	Could have been the Mayor?	19	•		testimony is that you don't know how you learned
20		No. It wasn't the Mayor.	20			that?
21		To your knowledge, based on your perception, was	21			No.
22		this fact known to the City including the Mayor that	22			You didn't learn it from Marilyn Figueroa, did you?
23		she was in the hospital in January and/or February?	23		-	No. The first is a second of the second of t
24	Δ	I don't know.	24			What about her family?
25		When you learned that she was in the hospital, did	i .		-	No.
	V	101		•		103
			1			o de la companya di Caralletta de la companya de l
4		1 ' did	1.4		$\overline{\cap}$	We talked extensively about the fact that at some
1		you ask in your regular meetings with the Mayor, did	1.1	(_	We talked extensively about the fact that at some
2		you ever ask him about that fact?	2		_	point Mayor Norquist decided to come open in public
2		you ever ask him about that fact? No.	2		_	point Mayor Norquist decided to come open in public and disclose his version of the relationship; is
2 3 4		you ever ask him about that fact? No. The fact that you learned that she was in the	2 3 4			point Mayor Norquist decided to come open in public and disclose his version of the relationship; is that correct?
2 3 4 5	Q	you ever ask him about that fact? No. The fact that you learned that she was in the hospital?	2 3 4 5		A	point Mayor Norquist decided to come open in public and disclose his version of the relationship; is that correct? Yes.
2 3 4 5 6	Q A	you ever ask him about that fact? No. The fact that you learned that she was in the hospital? No.	2 3 4		A	point Mayor Norquist decided to come open in public and disclose his version of the relationship; is that correct? Yes. And then we also talked about the fact that at some
2 3 4 5 6 7	Q A	you ever ask him about that fact? No. The fact that you learned that she was in the hospital? No. Do you recall, if you know, do you recall for how	2 3 4 5 6 7		A	point Mayor Norquist decided to come open in public and disclose his version of the relationship; is that correct? Yes. And then we also talked about the fact that at some point he also disclosed the complaint that was filed
2 3 4 5 6 7 8	Q A Q	you ever ask him about that fact? No. The fact that you learned that she was in the hospital? No. Do you recall, if you know, do you recall for how long she was in the hospital for that period?	2 3 4 5 6 7 8		A	point Mayor Norquist decided to come open in public and disclose his version of the relationship; is that correct? Yes. And then we also talked about the fact that at some point he also disclosed the complaint that was filed by Marilyn Figueroa with the Equal Rights Division;
2 3 4 5 6 7 8 9	Q A Q A	you ever ask him about that fact? No. The fact that you learned that she was in the hospital? No. Do you recall, if you know, do you recall for how long she was in the hospital for that period? No.	2 3 4 5 6 7 8 9		A Q	point Mayor Norquist decided to come open in public and disclose his version of the relationship; is that correct? Yes. And then we also talked about the fact that at some point he also disclosed the complaint that was filed by Marilyn Figueroa with the Equal Rights Division; is that correct?
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2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18 19 20 21 22 23	Q AQ AQ AQAQ A	you ever ask him about that fact? No. The fact that you learned that she was in the hospital? No. Do you recall, if you know, do you recall for how long she was in the hospital for that period? No. And I'm talking about January and/or February of 2000. Right. Did you ever have any contact with Marilyn Figueroa while she was in the hospital? No. Do you know if anyone did? No. What about Mr. Christofferson? Did he ever mention anything to you about, or you mention anything to him about the fact that you knew she was in the hospital? No. When you learned that she was in the hospital, what	2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18 19 20 21 22 23		AQ AQ AQA Q	point Mayor Norquist decided to come open in public and disclose his version of the relationship; is that correct? Yes. And then we also talked about the fact that at some point he also disclosed the complaint that was filed by Marilyn Figueroa with the Equal Rights Division; is that correct? Yes. And what is your understanding as to what Mayor Norquist was alleging as far as his version of this relationship is concerned? That it was a consensual relationship. And what is your understanding as to what Marilyn Figueroa was alleging and continues to allege with respect to that interaction with Mayor Norquist? This is total interpretation. That's fine. That initially it may have been consensual, but it didn't remain that way. And how did you develop that opinion that you just

	Q	Well, did you talk to anyone	1	Α	No.
2		No.	2	Q	Or what they may have heard?
3		close to Marilyn Figueroa?	3	A.	No.
4	. `	No.	4	Q	You stated that when Mayor Norquist decided to come
5		Now, with respect to the version that the	5		out after Marilyn had filed her complaint with the
6	~	Mayor Norquist advanced many months later after he	6		EOC on October 11th that you were, I think the word
7		was re-elected and obviously after Marilyn Figueroa	7		was shocked and disappointed; is that correct?
8		had filed her complaint, do you have any information	8	Α	Yes, yes.
9		or evidence of any kind that would help you to	9		What about your husband? Did he share any similar
10		conclude that Mayor Norquist's version is the	10	`	reaction as you did?
11		correct version in this case?	11	Α	Absolutely.
12	Δ	No.	12		What did he say?
13		And you have not addressed this claim that the Mayor	13		We were both shocked.
14	Ų	has made in public with him and/or his wife?	14		What did he say?
15	٨	No.	15	•	We couldn't believe it.
16		Is that your testimony? So if I were to take the	16		Did he feel as you did that the Mayor had lied to
17	Ų	testimony of Mrs. Norquist or whatever her name is,	17	~	him as well with respect to this issue?
18		you believe that that would be her position?	18	A:	He did not have a lot of contact with the Mayor.
19	٨	Yes.	19		That wasn't my question.
20		Is that correct?	20	-	No, I don't think so.
21	-	Yes.	21		My question was did he express the same reaction?
		Have you ever given testimony before under oath?		•	You were outraged?
22		No.	23		Yeah.
23		This is your first time?	24		Tell me about Mr. Soika. Did he ever discuss with
24 25	-	Yes.	25	V	you this relationship between Marilyn Figueroa and
25	^	105	-		107
<u></u>				•	and the first state of the sta
1	Q	You've never been involved in any legal proceedings	1		Norquist?
2		before?	2		No. Mr. Soika and I don't talk.
3		No.	3	Ų	You don't have any contact with him, okay. What
4	Q	Nevertheless, you understand that this is sworn			about Duth? Did you grow tall to how after the
	-	•	4		about Ruth? Did you ever talk to her after the
5		testimony?	5		Mayor decided to disclose his version after
5 6		testimony? Yes.	5	٨	Mayor decided to disclose his version after Marilyn Figueroa had filed a complaint against him?
6 7		testimony? Yes. And I have absolutely no reason to believe that	5 6 7		Mayor decided to disclose his version after Marilyn Figueroa had filed a complaint against him? Yes.
6 7 8		testimony? Yes. And I have absolutely no reason to believe that you're not telling me what you know. After the	5 6 7 8	Q	Mayor decided to disclose his version after Marilyn Figueroa had filed a complaint against him? Yes. When did you talk to her?
6 7 8 9		testimony? Yes. And I have absolutely no reason to believe that you're not telling me what you know. After the Mayor — I'm just interested in knowing when in the	5 6 7 8 9	Q A	Mayor decided to disclose his version after Marilyn Figueroa had filed a complaint against him? Yes. When did you talk to her? I can't remember specifically.
6 7 8 9 10		testimony? Yes. And I have absolutely no reason to believe that you're not telling me what you know. After the Mayor — I'm just interested in knowing when in the world you talked to Christofferson when he informed	5 6 7 8 9	Q A	Mayor decided to disclose his version after Marilyn Figueroa had filed a complaint against him? Yes. When did you talk to her? I can't remember specifically. Tell me the nature how many contacts have you had
6 7 8 9 10		testimony? Yes. And I have absolutely no reason to believe that you're not telling me what you know. After the Mayor — I'm just interested in knowing when in the world you talked to Christofferson when he informed you that he had some knowledge about the	5 6 7 8 9 10	Q A Q	Mayor decided to disclose his version after Marilyn Figueroa had filed a complaint against him? Yes. When did you talk to her? I can't remember specifically. Tell me the nature how many contacts have you had with her with respect to this particular issue?
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1 Do you know Ruth well? 2 A Yes. 3 Q Do you know if Ruth or any other staff member are arraid of the Mayor? 4 A Mac Mayor? 5 A Not Ruth. 6 Q What about you? 5 Q I like that reaction. Hell. me? No. Okay. 7 Our mentioned earlier that the Mayor has a reputation of taking a strong reaction to people that cross him or take the wrong side? 10 A Yes. 11 Q Is that correct? Do you know anyone that has ever been, in your view, affected by the Mayor's anger or wrath because he or she took a separate view or different approach to what he would have loved to have seen? 10 A There are people who he became angry with, yes. 11 Q Indownse Carl Mueller, John Tries, Evan Zeppos. 2 Q Anyone else? 3 A Thart's, you know, that's kind of my world, all right? 5 Q Employees that you know of, staff members? 6 A Steve Agostini. 10 Q Who had walked out or left the job, given what you know about his personality and conduct, did you sense that Marilyn may have getten on his wrong side? 2 A No. 3 Q Did you form any opinions at all with respect to why she left? 3 A Pice. 4 A No. 5 Q Did you form any opinions at all with respect to why she left? 5 A No. The Mayor never said anything other than positive things about it. 2 Q So the answer would be no? 3 A Right. 4 Q Is that correct? Provery next time is it fair and a currate to say that he came and shared with you the information that Marilyn may have getten on his wrong side? 4 A No. 5 Q Did you form any opinions at all with respect to why she left? 5 A No. The Mayor never said anything other than positive things about it. 2 Q So the answer would be no? 3 A Right. 4 Q Is that correct? The very next time is it fair and a currate to say that before he became public with 10 understand. 5 Q Is that correct? The very next time is it fair and a currate to say that because he peded to know? 5 A Yes. 6 Q Is the correct? The very next time is it fair and a currate to say that because he peded to know? 7 Q Is the correct? The very next time is it fair and a currate to say that because he peded to know? 8	Cas		ompress Deposition of BANDANA	· · ·		511 (VOL. 1) 115 1102 Sileet 25
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11	Α	No.	1	Α	He's a state senator from Stevens Point.
2		Did she tell you how she was terminated?	2		No wonder I don't know him. All I do is fight with
3	•	No.	3	`	those guys in Stevens Point.
4		Are you still under a salary from the Norquist	4		Did you ever discuss anything related to the
5	V	campaign?	5		allegations made against John Norquist with
6	Δ	Yes.	6		Jeff Gillis?
7		What's your compensation? How do you get paid? I	7	Α	No.
8	Ų	mean what kind of salary do you get?	8		Do you know who Jeff Gillis is?
9	Δ	You mean what do I make?	9		Absolutely.
10		Right.	10		Who is he?
111		\$60,000.	11	•	I know we were going to add him to the list of who
12		Working for him?	12		was in that initial list I gave you who advised the
13	-	Yes.	13		campaign.
14		That's not including what you make working for	14	Q	Michelle?
15	•	others?	15	-	No, Bill, my husband, you know, kind of the yeah.
16	A	Right.	16		Bill Gillis, who is he?
17		Is that correct? Are you also on a salary with	17	-	Jeff Gillis.
18	~	respect to others that you're working for?	18		Jeff Gillis?
19	Α	Yes. It changes.	19	-	Who is he now?
20		Is that right?	20		Well, tell me, what does he do?
21	-	Yes.	21	_	He's a consultant.
22		This relationship, is that a written contract that	22	: Q	Was he working on the Norquist campaign, re-election
23	341	you have	23		campaign in the year 2000?
24	Α	No. 18 Page 18	24	ŀΑ	He wasn't paid.
25	· Q	with the Mayor?	25	Q	But he was working?
		117			119
1	A	No.	5 1 :	Α	Yes.
2	Q	Just a verbal agreement?	2.	Q	Do you recall ever discussing anything related
3	Α	Right.	3		No.
4	·Q	Is that correct? So you don't have any job	4		to the Norquist rumors with Marilyn?
5		description or specific responsibilities?	5		No.
6		•	I -		
		Right.	6		Have you ever discussed with him this whole
7		Right. You don't have any dollar amount that you have	7	Q	Have you ever discussed with him this whole situation?
7 8	Q	Right. You don't have any dollar amount that you have promised to produce?	7	Q A	Have you ever discussed with him this whole situation? No.
9	Q A	Right. You don't have any dollar amount that you have promised to produce? No.	7 8 9	Q A Q	Have you ever discussed with him this whole situation? No. After Mr. Norquist came out?
9 10	Q A Q	Right. You don't have any dollar amount that you have promised to produce? No. Is that correct?	7 8 9 10	Q A Q A	Have you ever discussed with him this whole situation? No. After Mr. Norquist came out? No.
9 10 11	Q A Q A	Right. You don't have any dollar amount that you have promised to produce? No. Is that correct? No.	7 8 9 10 11	Q A Q A	Have you ever discussed with him this whole situation? No. After Mr. Norquist came out? No. Do you have any knowledge as to whether or not the
9 10 11 12	Q A Q A	Right. You don't have any dollar amount that you have promised to produce? No. Is that correct? No. Are you working with Mr. Christofferson in any other	7 8 9 10 11 12	Q A Q A	Have you ever discussed with him this whole situation? No. After Mr. Norquist came out? No. Do you have any knowledge as to whether or not the Mayor knows that you're not happy about the whole
9 10 11 12 13	Q A Q A Q	Right. You don't have any dollar amount that you have promised to produce? No. Is that correct? No. Are you working with Mr. Christofferson in any other political campaign?	7 8 9 10 11 12 13	Q A Q A	Have you ever discussed with him this whole situation? No. After Mr. Norquist came out? No. Do you have any knowledge as to whether or not the Mayor knows that you're not happy about the whole situation? First of all, you are not happy about
9 10 11 12 13 14	Q A Q A Q	Right. You don't have any dollar amount that you have promised to produce? No. Is that correct? No. Are you working with Mr. Christofferson in any other political campaign? Yes.	7 8 9 10 11 12 13 14	Q A Q A Q	Have you ever discussed with him this whole situation? No. After Mr. Norquist came out? No. Do you have any knowledge as to whether or not the Mayor knows that you're not happy about the whole situation? First of all, you are not happy about the whole situation?
9 10 11 12 13 14 15	Q A Q A Q	Right. You don't have any dollar amount that you have promised to produce? No. Is that correct? No. Are you working with Mr. Christofferson in any other political campaign? Yes. How many?	7 8 9 10 11 12 13 14 15	Q A Q A Q	Have you ever discussed with him this whole situation? No. After Mr. Norquist came out? No. Do you have any knowledge as to whether or not the Mayor knows that you're not happy about the whole situation? First of all, you are not happy about the whole situation? Right.
9 10 11 12 13 14 15 16	Q A Q A Q A Q A	Right. You don't have any dollar amount that you have promised to produce? No. Is that correct? No. Are you working with Mr. Christofferson in any other political campaign? Yes. How many? Two.	7 8 9 10 11 12 13 14 15	Q A Q A Q	Have you ever discussed with him this whole situation? No. After Mr. Norquist came out? No. Do you have any knowledge as to whether or not the Mayor knows that you're not happy about the whole situation? First of all, you are not happy about the whole situation? Right. That's what you testified. Do you know if the Mayor
9 10 11 12 13 14 15 16 17	Q A Q A Q A Q	Right. You don't have any dollar amount that you have promised to produce? No. Is that correct? No. Are you working with Mr. Christofferson in any other political campaign? Yes. How many? Two. Which ones are they?	7 8 9 10 11 12 13 14 15 16	Q A Q A Q	Have you ever discussed with him this whole situation? No. After Mr. Norquist came out? No. Do you have any knowledge as to whether or not the Mayor knows that you're not happy about the whole situation? First of all, you are not happy about the whole situation? Right. That's what you testified. Do you know if the Mayor has any knowledge about your unhappiness with his
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9 10 11 12 13 14 15 16 17 18	Q A Q A Q A Q A Q	Right. You don't have any dollar amount that you have promised to produce? No. Is that correct? No. Are you working with Mr. Christofferson in any other political campaign? Yes. How many? Two. Which ones are they? Doyle and Kevin Shibilski. How do you pronounce the last name, sorry?	7 8 9 10 11 12 13 14 15 16 17 18 19	Q A Q A Q A Q	Have you ever discussed with him this whole situation? No. After Mr. Norquist came out? No. Do you have any knowledge as to whether or not the Mayor knows that you're not happy about the whole situation? First of all, you are not happy about the whole situation? Right. That's what you testified. Do you know if the Mayor has any knowledge about your unhappiness with his conduct? I would no, I don't have any knowledge of that.
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9 10 11 12 13 14 15 16 17 18 19 20 21 22 23	Q A Q A Q A Q A Q A Q A Q A Q	Right. You don't have any dollar amount that you have promised to produce? No. Is that correct? No. Are you working with Mr. Christofferson in any other political campaign? Yes. How many? Two. Which ones are they? Doyle and Kevin Shibilski. How do you pronounce the last name, sorry? S-H-I-L-I-B-I-L-S-K-I. What is this gentleman? He's running for lieutenant governor. Now, am I in or am I out of the political circle?	7 8 9 10 11 12 13 14 15 16 17 18 19 20 21 22 23	Q A Q A Q A Q A Q	Have you ever discussed with him this whole situation? No. After Mr. Norquist came out? No. Do you have any knowledge as to whether or not the Mayor knows that you're not happy about the whole situation? First of all, you are not happy about the whole situation? Right. That's what you testified. Do you know if the Mayor has any knowledge about your unhappiness with his conduct? I would no, I don't have any knowledge of that. Did you let Mr. Christofferson know that you were not happy with the whole situation? Certainly. And what was his reaction when you made him
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9 10 11 12 13 14 15 16 17 18 19 20 21 22 23	Q A Q A Q A Q A Q A Q A Q A	Right. You don't have any dollar amount that you have promised to produce? No. Is that correct? No. Are you working with Mr. Christofferson in any other political campaign? Yes. How many? Two. Which ones are they? Doyle and Kevin Shibilski. How do you pronounce the last name, sorry? S-H-I-L-I-B-I-L-S-K-I. What is this gentleman? He's running for lieutenant governor. Now, am I in or am I out of the political circle?	7 8 9 10 11 12 13 14 15 16 17 18 19 20 21 22 23	Q A Q A Q A Q A	Have you ever discussed with him this whole situation? No. After Mr. Norquist came out? No. Do you have any knowledge as to whether or not the Mayor knows that you're not happy about the whole situation? First of all, you are not happy about the whole situation? Right. That's what you testified. Do you know if the Mayor has any knowledge about your unhappiness with his conduct? I would no, I don't have any knowledge of that. Did you let Mr. Christofferson know that you were not happy with the whole situation? Certainly. And what was his reaction when you made him

1	Α	Well, I think that he knows this was not something	1		Right.
2		that made me very happy, you know, or my husband.	2	Q	He didn't come out until December, correct? My
3	Q	Did he try to calm you down or convince you not?	3		question to you, do you question the motive given
4	`	Did you ever threaten to quit	4		that chronology, the fact that she had already filed
5	Α	No.	5		a complaint and he waits until after that to come
6		the campaign? Did you think that this would blow	6		out open? Did you ever question the motive at
7	V	over?	7		all
	٨	No.	8	Δ	No.
8		Do you have an opinion as to whether or not when the	9		given the timing?
9	Ų		10	-	Put it that way, no.
10		Mayor decided to come open, do you have an opinion	11		Inversely, did you ever wonder if he was genuine
11		as to whether or not Kris Christofferson was the one	12	Ų	
12		who recommended that he have a press conference and			about it why didn't he come out long before she
13		disclose this as a consensual relationship?	13	٨	filed her complaint? Did you ever wonder that?
14		I don't know, I don't know.	14		Wonder, never asked about, yes.
15	Q	If, assuming that this was a political move on the	15		So you did question the timing; true?
16		part of Mr. Christofferson, did you believe that	16		I never understood the timing.
17	_	that was the right thing to do?	17	Q	No, my question is but based on that, you did
18	Α	I've never asked anybody what the motivation was for	18		question the timing?
19		doing it.	19		More or less, yes.
20	Q	That wasn't my question. My question is assuming	20	Ų	Were you ever involved in any way in working with
21		that that would be the case, do you think that that	21	- 1	agencies and/or organizations that received block
22		was the right thing to do?	22		grants from the City for purposes of obtaining
23		I can't answer that. I don't -	23		funds? The same of
24	··Q	You knew that he did this after Marilyn Figueroa had	1	А	I'm not real aware of who gets block grants, but I
25		filed her complaint with the EOC; correct?	25	:*··	do a lot of nonprofit work. So I can't say no or
L		121			123
1	Α	Right.	11		yes.
2	Q	Do you believe, knowing the fact that she had filed	- 2	Q	Did the Mayor get any funding or receive any funds
3		a complaint, do you believe that the Mayor's	3	·	from any Hispanic agencies before his re-election?
4		intentions by coming out and labeling this as a	4	Α	Well, it couldn't be from agencies. You mean from
5		consensual relationship, do you believe that he was	5		Hispanic individuals?
6		genuine?	6		Right.
7		I think so.	7	Α	Sure.
8	Q	You think so? What leads you to say that? Did you	8	Q	And would those individuals be on this list?
9		ever question the timing?	9		Yes, yes.
10	Α	No, I didn't. Partly because when Marilyn filed her	10	Q	Any specific individual that comes to mind that you
11		complaint, I was in Green Bay working on the state	11		believe donated to John Norquist?
12		senate race, so I didn't have a real awareness of	12	Α	Well, David Espinoza, LaCasa, Walter Sava at the
13		the complaint being filed.	13		UCC. There were a lot of Hispanic donations.
14	Q	All right. Well, let's take a chronology here.	14	Q	What about Ortiz, Abel?
15		Okay.	15	Α	Yes.
16	Q	To get a set of facts together.	16	Q	What about Lupe Martinez?
17	À	Okay.	17	Α	Yes,
18		Here comes an employee who files a serious complaint	18	Q	What about Maria Cameron?
19	`	and it was not until after that that the public	19	Α	Yes, on and off.
20		appearance is made. Did you suspect motives in any	20	Q	What about Ernesto Chacon?
21		way when you keep that chronology in mind?	21	À	Yes, at some point.
22	Α	I assumed that he wanted to get it out before she	22		Any of the owners of restaurants?
			23		Yes.
		did.	1		
23	0	did. Well, we already established that she had already	24		Can you name a few?
23 24	Q	Well, we already established that she had already	1	Q	
23	Q		24	Q	Can you name a few?

					
1		of them. That kind of is what	1		And they were concerned that they would lose you -
2	Q	Did Marilyn have any input in generating funds from	2		Possibly.
3		any of these individuals?	3	Q	if you felt very strongly about this?
4	Α	Yes, yes.	4	Α	Yes, possibly.
5	Q	Have you started your political campaign now on	5	Q	Did you ever feel used about the fact that they knew
6	•	behalf of Mr. Norquist? Is that an ongoing thing?	6		they withheld that because they needed you?
7	Α	It's an ongoing thing.	7	Α	No. That's politics.
8		Have you received any funds for Mayor Norquist from	8		But that's what they were doing, they were using
9	~	any of these individuals?	9	•	you?
10	Δ	No.	10	Δ	Right. That's politics.
11			11		But you know they were using you; true?
12		Before the Mayor became open or at least with his	12		More or less.
1		version of this relationship, did you ever witness,			
13		observe the Mayor hug, embrace, kiss	13		You were willing to let them use you?
14		Marilyn Figueroa?	14		But I didn't know about it.
15		No.	15	Q	Well, but you haven't taken any strict actions
16	Q	Do you know anyone anywhere that may have observed	16		against either one?
17		the Mayor doing any of those things that I just	17		No.
18		identified?	18	··Q	You allowed them to use you over this period of
19		No.	19		time; true?
20	•	When he came out and stated that this was a			Well, I wouldn't frame it that way.
21		consensual relationship, did you question his	21	Q	How would you frame it? They needed you, as you
22	+ 11 - 12	version that this was a consensual relationship?	22	d 836	stated on the record; correct?
23	Α	No.	23	Α	Yes.
24	·Q	Why not? and the sequence of t	24	··Q	They decided not to tell you, correct, because they
25		Just because of the way he is.	25		felt they could lose you; true?
		125			127
1		Other than that do you have any other avidence that	1	Á	Thetle my intermedation
		Other than that, do you have any other evidence that	2		That's my interpretation.
3		would help you to support that? No.	1	Ų	And they also knew that you were a positive and a
			3	Λ	good fund raiser? Yes.
4	-	And when you say no because that's the way he is,	4		
5		what exactly do you mean?	5		So they used you; true?
6		Just the way his personality is. He's just so	6		I'm not willing to concede that.
7		nonassertive and non I mean	1 ′		But factually that is what happened; true?
8		Let's talk about the way he is. One thing that you	8		They didn't tell me, yes.
9		learned is that he was not very honest with you;	9		Are you familiar with Eloisa Gomez?
10		true? I mean he lied to you about the relationship;	10		Yes.
11		true?	11	Q	How do you know Eloisa Gomez?
12	Α	I never asked him about the relationship.	12		She worked for the Mayor.
13	Q	No, but you felt that he was not honest	13	Q	Do you know when she left the Mayor's office?
14	Α	Right.	14	Α	She left no, '92? I don't know.
15	Q	- in not disclosing it; true?	15	Q	Do you know why she left her employment?
16		Right.	16		Not specifically.
17		And another thing that you also learned about	17		What do you know about why she left?
		7	1		
18	-	Mr. Christofferson is that he was not totally open	18	Α	I don't know if she left or was asked to leave I
18 19		Mr. Christofferson is that he was not totally open with you	18	Α	I don't know if she left or was asked to leave. I
19		with you	19		don't know that.
19 20	A	with you Right.	19 20		don't know that. Do you know if Eloisa Gomez entered into some type
19 20 21	A Q	with you Right. about the relationship; true?	19 20 21		don't know that. Do you know if Eloisa Gomez entered into some type of agreement or settlement with the City of
19 20 21 22	A Q A	with you Right. about the relationship; true? Right.	19 20 21 22	Q	don't know that. Do you know if Eloisa Gomez entered into some type of agreement or settlement with the City of Milwaukee?
19 20 21 22 23	A Q A Q	with you Right. about the relationship; true? Right. And you believe that one of the reasons is because	19 20 21 22 23	Q A	don't know that. Do you know if Eloisa Gomez entered into some type of agreement or settlement with the City of Milwaukee? No, I don't know that.
19 20 21 22 23 24	A Q A Q	with you Right about the relationship; true? Right. And you believe that one of the reasons is because they needed you?	19 20 21 22 23 24	Q A	don't know that. Do you know if Eloisa Gomez entered into some type of agreement or settlement with the City of Milwaukee? No, I don't know that. Do you know, based on what you know, was her
19 20 21 22 23	A Q A Q	with you Right about the relationship; true? Right. And you believe that one of the reasons is because they needed you? Yes.	19 20 21 22 23	Q A	don't know that. Do you know if Eloisa Gomez entered into some type of agreement or settlement with the City of Milwaukee? No, I don't know that. Do you know, based on what you know, was her conduct, her person questioned by anyone?
19 20 21 22 23 24	A Q A Q	with you Right about the relationship; true? Right. And you believe that one of the reasons is because they needed you?	19 20 21 22 23 24	Q A	don't know that. Do you know if Eloisa Gomez entered into some type of agreement or settlement with the City of Milwaukee? No, I don't know that. Do you know, based on what you know, was her

1	Α	No.	1		complimentary.
2		Do you know who asked her to leave?	2	0	Did he continue to be complimentary all the way -
3		No.	3	•	when was the last time that he made any positive
13		Did she work under the Mayor's initiative? In other	1		remarks about Marilyn Figueroa?
14	Ų		5	۸	When we talked about whether she would come to the
5	_	words, was she a subordinate of John Norquist?	_	^	
6		Or the chief of staff.	6		campaign, he was positive about that.
7	Q	Is that correct? Obviously based on the way	1	•	When was that?
8		Mayor Norquist works, he would have approved her	8	Α	I don't know. Sometime when we were putting the
9		termination if she was terminated; correct?	9		campaign together in the fall.
10	Α	Yes, yes.	10	Q	Like early June, July?
11		Did you ever discuss that with the Mayor?	11	Α	September, October no, September, October.
12	-	Eloisa?	12		September, October?
13		Yes.	13	-	I think so.
14	•	No.	14		That was the last time you remember him making
		Have you ever seen Eloisa?	15	~	comments? Okay, all right. Have you ever seen any
15			16		records, letters, cards, notes coming from
16		Oh, sure.	17		Marilyn Figueroa to John Norquist?
17	· V	Where does she work?	18	Δ.	No.
18	- A	Where does she work? She worked I don't know	19		What about vice versa?
19		where she works now. She was at UW-M the last time.			•
20		Well, she works here in Milwaukee?	20		•
21		aYes. a consideration and a second control of section	21	•	Do you have any records, any commendations, letters
22	, Q	Have you seen her this year?	22		of support, thank you notes, sent on behalf of
23	Α	Yes. No, not since I saw her last fall.	23		Marilyn Figueroa when she worked for you?
24	Q	In the years that you worked with Marilyn Figueroa,			pNo. i ppar wer a realise arrowing ways a per palate care
25		were you ever asked to rate her performance?	25	Q	When she was working for you in any of the fund
-		129			131
1	Α	No.	1		raiser activities, do you recall anyone ever
2		Did you ever volunteer any opinion about how you	2		complaining about her professionalism and/or
3	V	view her performance?	3		conduct?
I A	Δ	No.	4	Α	No.
5		You gave Marilyn what I consider high ratings as far	5		Do you have any evidence from any source of Marilyn
6	V	as working with you in a professional setting; true?	6	`	being a promiscuous individual?
	٨	Right.	7	Α	No.
8		Did you ever share the same opinion with	8		In December or January, did you notice any type of
١,	Q	Mr. Christofferson or Mr. Norquist?	۱۵	· ·	stress, that you could notice, observe, any anxiety
19	, А	Mr. Christofferson or Mr. Norquist?	10		on the part of John Norquist?
10		Yes.	11	Δ	No. We're talking before the re-election?
111		How many times?			
12	Α	But not about her City, not about her City. I don't	12		I'm talking about December of 1999, January of 2000.
13		have an opinion.	13		No, uh-uh.
14		I understand that.	14	Q	Do you know whether or not strike that. Did you
15		Okay.	15		ever assert any denials to the press with respect to
16	Q	And I said in the campaign setting.	16		some of the rumors that were floating around before
17		Yes, yes.	17		he was elected? And I'm talking about the rumors
18	Q	You also stated that Mr. Norquist always spoke very	18		involving Ms. Figueroa.
19	Ì	kindly of Marilyn Figueroa?	19		Did I?
20	Α	Yes.	20	-	Yes.
21		Tell me some of the remarks that he would make about	21	Α	No.
22	•	Marilyn Figueroa.	22	Q	Do you know if Mr. Christofferson ever denied in
23	Α	That she was a great organizer. And that, you know,	23		public
24		all her fund raising we always spoke about the	24		I wouldn't know that.
25		stuff she was doing with me, and he was just very	25		these rumors?
120		130		`	132
<u></u>		ATIM REPORTING SERVICE, LLC (608) 2)55	7700	

11	Α	I wouldn't know that.	1		became the chief of police was the driver for
2		You've never seen any in any newspaper or any media?	2		Mayor Norquist?
3	-	No.	3	Α	Yes, he was.
4	0	Is that right?	4	Q	Do you know for how long?
5		I'm not aware of it.	5		No, I don't.
6		Did you ever learn before Marilyn left her City	6		Do you know who else during the years that you've
7	•	employment, did you ever know whether or not Marilyn	7	`	been associated with the Mayor, do you know who else
8		and John Norquist traveled outside City limits from	8		has been assigned to be the driver for
9		time to time?	9		Mayor Norquist?
10	Α	No, no.	10	Α	Yes. But I don't remember all their names. Linda.
11		Did he ever discuss that with you?	11		Linda?
12	-	No.	12	•	Linda.
13		Did you ever hear any other rumors involving any	13		Linda Valesco?
14	~	other employee –	14	_	Valesco. Bob Connelly, R. C., Dexter.
15	Α	No.	15		Dexter?
16		- and John Norquist? Did you ever keep a calendar	16	-	Uh-huh.
17	•	during the period that you were working on the	17		Out of all these individuals, do you know which one
18		re-election campaign?	18		served the longest?
19	Α	I don't keep calendars.	19	Α	No. Linda perhaps.
20		What about appointment books?	20		Linda Valesco?
21		r No. in secretaria	21	Α	"Uh-huh.
22		How do you remember when you have to meet people?	22	Q	To your knowledge, - do you know Linda well?
23	-	I remember.	23		No.
24	·Q	You never kept a calendar in your life?	24	· Q	Do you know who she is?
25	Α	Never in my life, no.	25	Α	Absolutely.
l		133			135
1		Any time of record in your computer?	1 4	_	
1	Q	Any type of record in your computer:	1.1	" Q	Do you know if she's still working for the City of
2		Any type of record in your computer? No, no. No palm pilot, nothing.	2	Q	Do you know if she's still working for the City of Milwaukee?
	Α		2 3		
2	A Q A	No, no. No palm pilot, nothing. Are you familiar with Maria Cameron? Yes.	1 4	Α	Milwaukee? I don't know. I don't think so, but I don't know for sure.
2 3 4 5	A Q A Q	No, no. No palm pilot, nothing. Are you familiar with Maria Cameron? Yes. Do you know her well?	3 4 5	Α	Milwaukee? I don't know. I don't think so, but I don't know for sure. Do you know who was the last person in the year 2000
2 3 4	A Q A Q A	No, no. No palm pilot, nothing. Are you familiar with Maria Cameron? Yes. Do you know her well? Not well.	3	A Q	Milwaukee? I don't know. I don't think so, but I don't know for sure. Do you know who was the last person in the year 2000 driving for the Mayor?
2 3 4 5 6 7	A Q A Q A	No, no. No palm pilot, nothing. Are you familiar with Maria Cameron? Yes. Do you know her well? Not well. Has she ever have you and Maria ever discussed	3 4 5 6 7	A Q A	Milwaukee? I don't know. I don't think so, but I don't know for sure. Do you know who was the last person in the year 2000 driving for the Mayor? No.
2 3 4 5 6 7 8	A Q A Q A Q	No, no. No palm pilot, nothing. Are you familiar with Maria Cameron? Yes. Do you know her well? Not well. Has she ever have you and Maria ever discussed Marilyn Figueroa?	3 4 5 6 7 8	A Q A	Milwaukee? I don't know. I don't think so, but I don't know for sure. Do you know who was the last person in the year 2000 driving for the Mayor? No. To your knowledge, is he assigned a body guard,
2 3 4 5 6 7 8 9	A Q A Q A Q	No, no. No palm pilot, nothing. Are you familiar with Maria Cameron? Yes. Do you know her well? Not well. Has she ever have you and Maria ever discussed Marilyn Figueroa? No.	3 4 5 6 7 8 9	A Q A Q	Milwaukee? I don't know. I don't think so, but I don't know for sure. Do you know who was the last person in the year 2000 driving for the Mayor? No. To your knowledge, is he assigned a body guard, security person other than the drivers?
2 3 4 5 6 7 8 9	A Q A Q A Q	No, no. No palm pilot, nothing. Are you familiar with Maria Cameron? Yes. Do you know her well? Not well. Has she ever have you and Maria ever discussed Marilyn Figueroa? No. John Norquist or the allegations concerning	3 4 5 6 7 8 9	A Q A Q A	Milwaukee? I don't know. I don't think so, but I don't know for sure. Do you know who was the last person in the year 2000 driving for the Mayor? No. To your knowledge, is he assigned a body guard, security person other than the drivers? No.
2 3 4 5 6 7 8 9 10	A Q A Q A Q	No, no. No palm pilot, nothing. Are you familiar with Maria Cameron? Yes. Do you know her well? Not well. Has she ever have you and Maria ever discussed Marilyn Figueroa? No. John Norquist or the allegations concerning John Norquist?	3 4 5 6 7 8 9 10	A Q A Q A Q	Milwaukee? I don't know. I don't think so, but I don't know for sure. Do you know who was the last person in the year 2000 driving for the Mayor? No. To your knowledge, is he assigned a body guard, security person other than the drivers? No. Or is that the security person?
2 3 4 5 6 7 8 9 10 11	A Q A Q A Q A	No, no. No palm pilot, nothing. Are you familiar with Maria Cameron? Yes. Do you know her well? Not well. Has she ever have you and Maria ever discussed Marilyn Figueroa? No. John Norquist or the allegations concerning John Norquist? No.	3 4 5 6 7 8 9 10 11 12	A Q A Q A	Milwaukee? I don't know. I don't think so, but I don't know for sure. Do you know who was the last person in the year 2000 driving for the Mayor? No. To your knowledge, is he assigned a body guard, security person other than the drivers? No. Or is that the security person? That's the security person.
2 3 4 5 6 7 8 9 10 11 12 13	A Q A Q A Q A Q	No, no. No palm pilot, nothing. Are you familiar with Maria Cameron? Yes. Do you know her well? Not well. Has she ever have you and Maria ever discussed Marilyn Figueroa? No. John Norquist or the allegations concerning John Norquist? No. What about Abel Ortiz?	3 4 5 6 7 8 9 10 11 12 13	A Q A Q A	Milwaukee? I don't know. I don't think so, but I don't know for sure. Do you know who was the last person in the year 2000 driving for the Mayor? No. To your knowledge, is he assigned a body guard, security person other than the drivers? No. Or is that the security person? That's the security person. Since Marilyn left the City on January 4th of 2000,
2 3 4 5 6 7 8 9 10 11 12 13	A Q A Q A Q A Q A	No, no. No palm pilot, nothing. Are you familiar with Maria Cameron? Yes. Do you know her well? Not well. Has she ever — have you and Maria ever discussed Marilyn Figueroa? No. John Norquist or the allegations concerning John Norquist? No. What about Abel Ortiz? No.	3 4 5 6 7 8 9 10 11 12 13	A Q A Q A	Milwaukee? I don't know. I don't think so, but I don't know for sure. Do you know who was the last person in the year 2000 driving for the Mayor? No. To your knowledge, is he assigned a body guard, security person other than the drivers? No. Or is that the security person? That's the security person. Since Marilyn left the City on January 4th of 2000, have you had any communication with Attorney
2 3 4 5 6 7 8 9 10 11 12 13 14 15	A Q A Q A Q A Q A	No, no. No palm pilot, nothing. Are you familiar with Maria Cameron? Yes. Do you know her well? Not well. Has she ever have you and Maria ever discussed Marilyn Figueroa? No. John Norquist or the allegations concerning John Norquist? No. What about Abel Ortiz? No. Did any of these individuals ever raise questions	3 4 5 6 7 8 9 10 11 12 13 14 15	A Q A Q A Q A Q	Milwaukee? I don't know. I don't think so, but I don't know for sure. Do you know who was the last person in the year 2000 driving for the Mayor? No. To your knowledge, is he assigned a body guard, security person other than the drivers? No. Or is that the security person? That's the security person. Since Marilyn left the City on January 4th of 2000, have you had any communication with Attorney Anne Shindell?
2 3 4 5 6 7 8 9 10 11 12 13 14 15 16	A Q A Q A Q A Q A Q	No, no. No palm pilot, nothing. Are you familiar with Maria Cameron? Yes. Do you know her well? Not well. Has she ever have you and Maria ever discussed Marilyn Figueroa? No. John Norquist or the allegations concerning John Norquist? No. What about Abel Ortiz? No. Did any of these individuals ever raise questions regarding this matter with you?	3 4 5 6 7 8 9 10 11 12 13 14 15 16	A Q A Q A Q A Q A Q	Milwaukee? I don't know. I don't think so, but I don't know for sure. Do you know who was the last person in the year 2000 driving for the Mayor? No. To your knowledge, is he assigned a body guard, security person other than the drivers? No. Or is that the security person? That's the security person. Since Marilyn left the City on January 4th of 2000, have you had any communication with Attorney Anne Shindell? No.
2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17	A Q A Q A Q A Q A Q A	No, no. No palm pilot, nothing. Are you familiar with Maria Cameron? Yes. Do you know her well? Not well. Has she ever have you and Maria ever discussed Marilyn Figueroa? No. John Norquist or the allegations concerning John Norquist? No. What about Abel Ortiz? No. Did any of these individuals ever raise questions regarding this matter with you? No.	3 4 5 6 7 8 9 10 11 12 13 14 15 16 17	A Q A Q A Q A Q A Q	Milwaukee? I don't know. I don't think so, but I don't know for sure. Do you know who was the last person in the year 2000 driving for the Mayor? No. To your knowledge, is he assigned a body guard, security person other than the drivers? No. Or is that the security person? That's the security person. Since Marilyn left the City on January 4th of 2000, have you had any communication with Attorney Anne Shindell? No. Have you ever been at any meetings where
2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18	A Q A Q A Q A Q A Q	No, no. No palm pilot, nothing. Are you familiar with Maria Cameron? Yes. Do you know her well? Not well. Has she ever — have you and Maria ever discussed Marilyn Figueroa? No. John Norquist or the allegations concerning John Norquist? No. What about Abel Ortiz? No. Did any of these individuals ever raise questions regarding this matter with you? No. Let's talk about Chief Jones.	3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18	A Q A Q A Q A Q	Milwaukee? I don't know. I don't think so, but I don't know for sure. Do you know who was the last person in the year 2000 driving for the Mayor? No. To your knowledge, is he assigned a body guard, security person other than the drivers? No. Or is that the security person? That's the security person. Since Marilyn left the City on January 4th of 2000, have you had any communication with Attorney Anne Shindell? No. Have you ever been at any meetings where Anne Shindell
2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18 19	AQAQAQ AQAQ AQA	No, no. No palm pilot, nothing. Are you familiar with Maria Cameron? Yes. Do you know her well? Not well. Has she ever have you and Maria ever discussed Marilyn Figueroa? No. John Norquist or the allegations concerning John Norquist? No. What about Abel Ortiz? No. Did any of these individuals ever raise questions regarding this matter with you? No. Let's talk about Chief Jones. Okay.	3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18 19	A Q A Q A Q A Q A	Milwaukee? I don't know. I don't think so, but I don't know for sure. Do you know who was the last person in the year 2000 driving for the Mayor? No. To your knowledge, is he assigned a body guard, security person other than the drivers? No. Or is that the security person? That's the security person. Since Marilyn left the City on January 4th of 2000, have you had any communication with Attorney Anne Shindell? No. Have you ever been at any meetings where Anne Shindell No.
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2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18 19 20 21 22 23	AQAQAQ AQAQAQ	No, no. No palm pilot, nothing. Are you familiar with Maria Cameron? Yes. Do you know her well? Not well. Has she ever have you and Maria ever discussed Marilyn Figueroa? No. John Norquist or the allegations concerning John Norquist? No. What about Abel Ortiz? No. Did any of these individuals ever raise questions regarding this matter with you? No. Let's talk about Chief Jones. Okay. Do you ever socialize No or were in any way involved with doing activities with Chief Jones?	3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18 19 20 21 22 23	A Q A Q A Q A Q A Q A	Milwaukee? I don't know. I don't think so, but I don't know for sure. Do you know who was the last person in the year 2000 driving for the Mayor? No. To your knowledge, is he assigned a body guard, security person other than the drivers? No. Or is that the security person? That's the security person. Since Marilyn left the City on January 4th of 2000, have you had any communication with Attorney Anne Shindell? No. Have you ever been at any meetings where Anne Shindell No has spoken? No. Have you ever met with Attorney Lester Pines? No.
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1	Α	No.	1		John Norquist had confided and/or admitted having
2		MR. FINERTY: Pines?	2		had a sexual relationship with Marilyn Figueroa
3		MR. ARELLANO: P-I-N-E-S.	3		before he became public?
4	0	Before coming to this deposition did you review any	4	Α	No.
5	V	records and/or documents?	5		Do you know John Norquist's close or personal
	٨	· · · · · · · · · · · · · · · · · · ·	6	Y	friends, if he has any?
6		Like?	-	٨	•
7		Any type of records related to these proceedings.	1		Yes.
8	Α	No. I mean I brought what	8		Who are they?
9		MR. ARELLANO: Why don't we take a	9	Α	I'd say Tom and Roxanne Crawford are his closest
10		second and show me what you have produced	10		friends.
11		today, counsel.	11		MR. FINERTY: Who?
12		MR. FINERTY: Sure.	12		THE WITNESS: Tom and
13		(Discussion off the record)	13		Roxanne Crawford.
14	Ω	Have you ever met with any of the City attorneys	14	0	Crawford? Anyone else?
	Ų	related to the Marilyn Figueroa-John Norquist	15	-	No.
15			16		By your reaction to the news that he exposed, I
16		proceedings?	17	V	sense that you also felt to be a close friend of
17		No.	1		
18	Q	You have known for quite some time that your	18		John Norquist? You and your husband to be more
19		deposition was being scheduled?	19		precise.
20		Right.	20		I don't think you're friends with John.
21	.∙Q.	Is that correct? Did you ever consult with	21	_	Well, given whatever
22	- 5	Mr. Norquist?	22		Right.
23	Α	No, no.	23	. Q	boundaries he would allow you to approach him,
24	Q	Have you at any time during this year after Marilyn	24		with those limitations in mind, and I'm talking
25		was terminated from her employment discuss	25	:	about the fact that what you're telling me is that
		137			139
		The second secon			
1		Marilum Figueroa with Marquiet?	1		he kind of keens people at a distance is that what
1	^	Marilyn Figueroa with Norquist?	. 1		he kind of keeps people at a distance; is that what
2 .		No.	2.	Δ	you're telling me?
2 .		No. You have stated I think on two occasions that you	3		you're telling me? Yes.
2 3 4		No. You have stated I think on two occasions that you believe John Norquist's version that he had a	2 3 4		you're telling me? Yes. Given that structure of his personality, did you
2 3 4 5		No. You have stated I think on two occasions that you believe John Norquist's version that he had a consensual relationship with Marilyn Figueroa;	2 3 4 5		you're telling me? Yes. Given that structure of his personality, did you consider, you and your husband consider yourselves
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2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18 19 20 21 22	Q AQ AQ AQ AQ	No. You have stated I think on two occasions that you believe John Norquist's version that he had a consensual relationship with Marilyn Figueroa; right? Yes. But you are not able to tell me on what basis you have come to that conclusion? Right. Marilyn Figueroa claims that she was sexually harassed, coerced, used during her employment by John Norquist. Do you have any basis for not believing Marilyn Figueroa? No. Have you kept any copies of newspapers related to the Marilyn Figueroa-John Norquist matters? No. Is it fair and accurate to say that if there were any meetings to strategize how to deal with Marilyn Figueroa, you have not participated in any? That's correct.	2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18 19 20 21 22	Q A Q A Q A Q A Q A	you're telling me? Yes. Given that structure of his personality, did you consider, you and your husband consider yourselves close friends of John Norquist, with that caveat? I think we're friends with him. Not how we would define other friendships. Let's talk about did you spend any Christmas with Norquist? No. Birthday parties? His 50th birthday party. What about you did state that from time to time you would go out? Yes. Well, how would you describe your relationship with Norquist; just business relationship or both? Both. Other than Tom and Roxanne Crawford, do you know any other people that are close to Norquist? No.
2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18 19 20 21 22 23	Q AQ AQ AQ AQ	No. You have stated I think on two occasions that you believe John Norquist's version that he had a consensual relationship with Marilyn Figueroa; right? Yes. But you are not able to tell me on what basis you have come to that conclusion? Right. Marilyn Figueroa claims that she was sexually harassed, coerced, used during her employment by John Norquist. Do you have any basis for not believing Marilyn Figueroa? No. Have you kept any copies of newspapers related to the Marilyn Figueroa-John Norquist matters? No. Is it fair and accurate to say that if there were any meetings to strategize how to deal with Marilyn Figueroa, you have not participated in any? That's correct. Is that your sworn testimony today?	2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18 19 20 21 22 23	Q A Q A Q A Q A Q	you're telling me? Yes. Given that structure of his personality, did you consider, you and your husband consider yourselves close friends of John Norquist, with that caveat? I think we're friends with him. Not how we would define other friendships. Let's talk about did you spend any Christmas with Norquist? No. Birthday parties? His 50th birthday party. What about you did state that from time to time you would go out? Yes. Well, how would you describe your relationship with Norquist; just business relationship or both? Both. Other than Tom and Roxanne Crawford, do you know any other people that are close to Norquist? No. Are these folks in the City of Milwaukee?
2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18 19 20 21 22 23 24	Q AQ AQ AQ AQA	No. You have stated I think on two occasions that you believe John Norquist's version that he had a consensual relationship with Marilyn Figueroa; right? Yes. But you are not able to tell me on what basis you have come to that conclusion? Right. Marilyn Figueroa claims that she was sexually harassed, coerced, used during her employment by John Norquist. Do you have any basis for not believing Marilyn Figueroa? No. Have you kept any copies of newspapers related to the Marilyn Figueroa-John Norquist matters? No. Is it fair and accurate to say that if there were any meetings to strategize how to deal with Marilyn Figueroa, you have not participated in any? That's correct. Is that your sworn testimony today? Yes.	2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18 19 20 21 22 23 24	Q A Q A Q A Q A Q A	you're telling me? Yes. Given that structure of his personality, did you consider, you and your husband consider yourselves close friends of John Norquist, with that caveat? I think we're friends with him. Not how we would define other friendships. Let's talk about did you spend any Christmas with Norquist? No. Birthday parties? His 50th birthday party. What about you did state that from time to time you would go out? Yes. Well, how would you describe your relationship with Norquist; just business relationship or both? Both. Other than Tom and Roxanne Crawford, do you know any other people that are close to Norquist? No. Are these folks in the City of Milwaukee? Yes.
2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18 19 20 21 22 23	Q AQ AQ AQ AQA	No. You have stated I think on two occasions that you believe John Norquist's version that he had a consensual relationship with Marilyn Figueroa; right? Yes. But you are not able to tell me on what basis you have come to that conclusion? Right. Marilyn Figueroa claims that she was sexually harassed, coerced, used during her employment by John Norquist. Do you have any basis for not believing Marilyn Figueroa? No. Have you kept any copies of newspapers related to the Marilyn Figueroa-John Norquist matters? No. Is it fair and accurate to say that if there were any meetings to strategize how to deal with Marilyn Figueroa, you have not participated in any? That's correct. Is that your sworn testimony today?	2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18 19 20 21 22 23	Q A Q A Q A Q A Q A	you're telling me? Yes. Given that structure of his personality, did you consider, you and your husband consider yourselves close friends of John Norquist, with that caveat? I think we're friends with him. Not how we would define other friendships. Let's talk about did you spend any Christmas with Norquist? No. Birthday parties? His 50th birthday party. What about you did state that from time to time you would go out? Yes. Well, how would you describe your relationship with Norquist; just business relationship or both? Both. Other than Tom and Roxanne Crawford, do you know any other people that are close to Norquist? No. Are these folks in the City of Milwaukee?

Cas	e Co	ompress Deposition of BARBARA i	₹. C	AN	DY (VOL. I) 1/31/02 Sheet 36
1	Α	No.	1	Α	Somewhat.
2	Q	Do you know them? Do you know them?	2	Q	It wouldn't be a serious matter to you?
3	•	I've met Mrs. Crawford once and him once at John's	3	À	It would be a serious matter. I mean there's a
4		birthday party.	4		difference between spinning the press and flat out
5	0	Do you know how they know each other?	5		lying.
6	-	He was in the legislature.	6	0	Well, spinning, if you and I understand that, is
7		Tom Crawford?	7	*	manipulating
8	-	Yes.	8	Α	Right.
9		Okay.	9		certain facts; correct?
10		He works at the sewage district now.	10		Yes.
11		How long has Ruth worked for John Norquist?	11		And the person that was responsible for spinning
12	-	I can't tell you specifically. I'd say 20 years.	12	V	things within the political campaign group would be
13		Do you know if Ruth, is she married?	13		Mr. Christofferson; true?
14	-	Yes.	14	Δ	True.
15		Do you know if Ruth and her husband are close to	15		You don't believe that just because this is a
	Ų	•	16	٧	political organization, it would be justifying lying
16	٨	Norquist?	17		to the press and to the public?
17		They're not.		Δ	No.
18		Why did you make such a firm statement? Because they don't spend any social time together.	19		That's not the way you operate, do you?
		Is it fair and accurate to say, based on what you	20		No.
20	Ų	know, that Ruth is the person that conducts most of	ł .		MR. ARELLANO: Let's go off the
22		•	22		record for a minute.
23		the scheduling and planning for John Norquist in his	23		
	Α.,	office?		: ^	(Discussion off the record)
24 25		She oversees it, yes. Do you know if anyone within the political campaign	25		Let me show you, Ms. Candy, a record which has been
25	· V	141	23		marked as Exhibit No. 1, and let me ask you to tell 143
		HTTL			
1		organization serves as, in the same capacity as Ruth	1		me whether or not that is a notice of taking of your
2		serves for while he works for the City?	2		deposition and a subpoena duces tecum?
3		She did both.	3		Yes.
4		She also handles the political aspect of it?	4		And did you receive that document?
5		Yes.	5		Yes.
6		And you say 20 years?	6		Were you served with that document?
7		Yes.	[/	_	Yes.
8	Q	If Mr. Christofferson knew about this relationship	8	Q	, , , , , , , , , , , , , , , , , , , ,
9		and he also knew that you were denying that this	9		not, that it contains a total of 16 pages; is that
10		relationship existed, he would then be lying to you,	10		correct?
11		correct, by not telling you; true?	11		Yes.
12		Well, lying's a strong word.	12	Q	And many of the questions request records and other
13		Well, that wouldn't be very honest to do?	13		questions request information; is that correct?
14		That would be correct.	14		Right.
15	Q	Similarly, if he knew of the relationship and he	15	Ç	And you have produced a box of records; is that
16		told the press or anyone that it was not true, that	16	-	correct?
17		would also be a lie; true?	17		Right, right.
18		Technically.	18	Ç	And I have put on the record that I will have, I
19	Q	And any other manner would also be a lie, factually;	19		will need some time to review those records, and I
20		correct?	20		notice that they are quite a few records that you
21		I guess.	21		have produced today. And then tomorrow I don't
22	Q	Do you know if Mr. Christofferson ever lied to the	22		expect to spend more than two hours with you to
23		press?	23		complete your deposition, and hopefully I don't have
24	Α	I don't know.	24		to call you back until the day of trial.
25	Q	That would concern you, wouldn't it?	25	P	A Okay.
1		142			144
1.00		TIM DEDODTING SERVICE LLC (608)	SEE -	770	Page 1/1 to Page 1/4

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Q Is that okay?
 2
      A Yes.
 3
                     MR. ARELLANO: Is that acceptable
 4
             to counsel?
 5
                     (Discussion off the record)
 6
 7
 8
9
                   (Adjourning at 3:35 p.m.)
10
11
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25
                                  145
      STATE OF WISCONSIN
2
     COUNTY OF DANE
3
       I, TAUNIA NORTHOUSE, a Registered Diplomate Reporter
     and Notary Public in and for the State of Wisconsin, do
5
     hereby certify that the foregoing deposition was taken
6
     before me at the offices of Murphy, Gillick, Wicht &
7
     Prachthauser, Attorneys at Law, 330 East Kilbourn
     Avenue, City of Milwaukee, County of Milwaukee, and
9
     State of Wisconsin, on the 31st day of January 2002,
10
     that it was taken at the request of the Complainant,
11
     upon verbal interrogatories; that it was taken in
12
     shorthand by me, a competent court reporter and
13
     disinterested person, approved by all parties in
     interest and thereafter converted to typewriting using
14
15
     computer-aided transcription; that said deposition is a
16
     true record of the deponent's testimony; that the
17
     appearances were as shown on Page 3 of the deposition;
18
     that the deposition was taken pursuant to notice and
19
     subpoena duces tecum; that said BARBARA R. CANDY before
20
     examination was sworn by me to testify the truth, the
21
     whole truth, and nothing but the truth relative to said
22
23
               Dated February 3, 2003.
24
25
                             Registered Diplomate Reporter
                             Notary Public, State of Wisconsin
146
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