

STATE OF WISCONSIN
DEPARTMENT OF WORKFORCE DEVELOPMENT
EQUAL RIGHTS DIVISION
MILWAUKEE COUNTY

MARILYN FIGUEROA.

Complainant,

-VS-

CITY OF MILWAUKEE.

Respondent.

ERD Case No.
CR200003454

Videotape Deposition of:

BARBARA R. CANDY

Milwaukee, Wisconsin
January 31, 2002

Reporter: Taunia Northouse, RDR, CRR

VIDEOTAPE DEPOSITION of BARBARA R. CANDY,

called as a witness, taken at the instance of the Complainant, under the provisions of Chapter 885 of the Wisconsin Statutes, pursuant to notice and subpoena duces tecum, before Taunia Northouse, a Registered Diplomate Reporter and Notary Public in and for the State of Wisconsin, at the offices of Murphy, Gillick, Wicht & Prachthauser, Attorneys at Law, 330 East Kilbourn Avenue, City of Milwaukee, County of Milwaukee, and State of Wisconsin, on the 31st day of January 2002, commencing at 11:10 in the forenoon.

A P P E A R A N C E S

VICTOR M. ARELLANO, Attorney,
for LAWTON & CATES, S.C., Attorneys at Law,
10 East Doty Street, Madison, Wisconsin,
appearing on behalf of the Complainant.

BRUCE D. SCHRIMPF and LEONARD A. TOKUS, Assistant City Attorneys, for CITY OF MILWAUKEE, OFFICE OF THE CITY ATTORNEY, 200 East Wells Street, Milwaukee, Wisconsin, appearing on behalf of the Respondent.

JOHN D. FINERTY, Attorney,
for FRIEBERT, FINERTY & ST. JOHN, S.C., Attorneys
at law, 330 East Kilbourn Avenue, Milwaukee,
Wisconsin, appearing on behalf of the witness.

Also present: Marilyn Figueroa and Cheri Garcia
Emily Aurit (videographer)

I N D E X

WITNESS

BARBARA R. CANDY

Examination by Mr. Arellano

Page(s)

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E X H I B I T S

<u>No.</u>	<u>Description</u>	<u>Identified</u>
1	Notice and subpoena duces tecum	143
2	List of campaign contributors	34

(Original exhibits returned by the reporter to Attorney Finerty; copies attached to the original transcript and provided to counsel)

(Original transcript filed with Attorney Arellano)

BARBARA R. CANDY,

called as a witness, being first duly sworn,
testified on oath as follows:

MR. ARELLANO: Before we start, on the record, counsel, who's going to be leading here?

MR. SCHRIMPF: I will.

MR. ARELLANO: Thank you. And your name?

MR. SCHRIMPF: Bruce Schrimpf.

MR. ARELLANO: Thank you. Go ahead. I apologize.

EXAMINATION

By Mr. Arellano:

Q Good morning, ma'am.

A Good morning.

Q As you heard, my name is Victor Arellano, and I represent Ms. Marilyn Figueroa. I will be asking you questions this morning. Obviously I expect you to take your time so that you can first understand my question and, secondly, so that you can give me an answer.

For some reason you cannot understand my

1 question, feel free to let me know. You are not
2 going to hurt my feelings. I don't have any, okay?
3 I can rephrase the question. I can modify it. I
4 can withdraw it and ask you a new question. The one
5 thing I do want to make sure that we do is that we
6 understand each other so that the record is clear.
7 I would hate to hear you say at the day of the trial
8 I didn't quite understand your question. I'll stay
9 here until you feel comfortable. Is that okay?
10 A Yes.
11 Q In talking I'm sure with your very able counsel you
12 have received some instructions about what to expect
13 in a deposition. It's basically a question and
14 answer type thing. Unless your attorney for some
15 limited but very important purpose tells you not to
16 answer, I still want you to provide me with an
17 answer. The person who is going to be objecting in
18 these particular proceedings, unless your counsel
19 tells you not to answer, will be Mr. Schrimpf who is
20 present here representing the City of Milwaukee. If
21 for some reason you need to take a break, not for
22 the purpose of trying to determine how to answer a
23 question but simply because you feel tired or you
24 need --
25 A Because I chain smoke, yeah.

5

1 Q That's fine, that's fine. You can take a break.
2 Just let me know.
3 Are you under any type of medication that may
4 require you to take a break?
5 A No.
6 Q Or that may inhibit or not allow you to recollect,
7 remember things?
8 A No.
9 Q Other than the normal course of nature? Okay, all
10 right. My last statement I want to make before I
11 start asking you questions is that I expect you to
12 tell me what you know.
13 A Uh-huh.
14 Q And if you don't know, just simply tell me I don't
15 recall, I don't know the answer. But this is
16 obviously a judicial proceeding where you are giving
17 testimony under oath. I don't think I ever met you
18 before. We'll get used to each other a little bit.
19 You'll get used to my German accent and we'll get
20 this whole thing rolling. Is that okay?
21 A Uh-huh.
22 Q Any questions?
23 A Yes. I don't understand what they are -- they can't
24 ask me questions?
25 Q Yes, Mr. Schrimpf can ask you questions.

6

1 A Okay.
2 Q When I am done. He can ask you questions for
3 clarification. He can introduce documents if that's
4 what he wishes to do.
5 A Okay.
6 Q He represents the interest of the City of Milwaukee.
7 But obviously your attorney, unless there is some
8 privileged matter that he wants to protect, he may
9 want to clarify something, but he is not going to be
10 participating in these proceedings, with all due
11 respect.
12 MR. ARELLANO: Is that right,
13 counsel?
14 MR. FINERTY: No. I made my
15 appearance. I'm in attendance only.
16 MR. ARELLANO: Thank you, judge.
17 See, you look like a judge. Impressive.
18 MR. FINERTY: That's close enough.
19 MR. ARELLANO: And I hope I'm not
20 really overwhelming you with my presence. I
21 always get a little spot in here.
22 Q Okay. Let me ask you to give us your full name and
23 address for the record.
24 A It's Barbara Ruth Candy.
25 Q And what's your address?

7

1 A 4071 Richland Court, Shorewood, 53211.
2 Q And let me just briefly ask you to summarize your
3 education, your academic accomplishments, if you
4 will.
5 A I have a bachelor's degree in political science from
6 McAllister College.
7 Q Anything else?
8 A No.
9 Q When did you graduate from this college?
10 A 1974.
11 Q Good year. You graduated with a major in political
12 science?
13 A Uh-huh.
14 Q Did you take any other sub --
15 A Anthropology.
16 Q Anthropology. Human anthropology I suspect?
17 A Uh-huh.
18 MR. SCHRIMPF: Could I ask the
19 witness and counsel to speak up just a bit
20 because sometimes -- you're close to each
21 other and sometimes you're fading off and it's
22 difficult to hear you.
23 MR. ARELLANO: Boy, I'm honored.
24 This is the first time somebody asked me to
25 speak loud.

8

1 MR. FINERTY: Do you want to change	1 Q Anything else other than typesetting?
2 seats with me?	2 A No.
3 MR. SCHRIMPF: No, that's okay.	3 Q 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 A Oh, no.
6 sure you participate in this.	6 Q Tell me the period of time in which you were
7 Q Any special training other than your academic	7 employed by A. B. Data.
8 accomplishments?	8 A Maybe '86, '85, '86. I'm not sure specifically the
9 A (No verbal response).	9 dates.
10 Q 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 A I think so, yes.
13 answer.	13 Q Okay, very good. And what is your current
14 A Okay, okay.	14 occupation right now?
15 Q I usually will understand the nodding or the uh-huh,	15 A I'm a political fund raiser.
16 but we do want the record to be very clear. So you	16 Q And tell me just -- it sounds like a self-defining
17 will have to take the extra effort to say yes, no, I	17 title, but tell me the nature of the work that you
18 don't recall, et cetera.	18 do as a political fund raiser.
19 A Okay.	19 A I raise money for various politicians.
20 Q You mentioned that you have no special training in	20 Q And is this a full-time job?
21 any field other than what you accomplished in your	21 A Yes.
22 college?	22 Q Perhaps beyond full-time?
23 A No.	23 A Yeah.
24 Q Very good. Are you married?	24 Q Is that correct?
25 A Yes.	25 A Right.
9	11
1 Q Who are you married to?	1 Q And do you have a consulting firm? Is this a
2 A Charles Pruitt.	2 business that you own? Is that yes?
3 Q How do you spell the last name?	3 A It's not a corporation.
4 A P-R-U-I-T-T.	4 Q Okay.
5 Q P-R-U-I-T-T. See, I can't even write. All right.	5 A Yes.
6 What is his profession?	6 Q How is this business identified?
7 A He owns A. B. Data, which is a political consulting	7 A I work out of my home.
8 firm.	8 Q Do you advertise?
9 Q Where is this business located?	9 A No.
10 A In a suburb of Milwaukee.	10 Q Do you have a business card that you carry with you?
11 Q How long has he owned this consulting firm?	11 A No.
12 A 16 years.	12 Q Is there a title or just your name?
13 Q Are you or have you ever been employed for this	13 A Just my name.
14 particular consulting firm?	14 Q Just by your name, okay. And so you would represent
15 A Yes.	15 yourself as a Barb Candy, Ms. Barb Candy, a
16 Q In what capacity?	16 political fund raiser?
17 A I ran their typesetting company.	17 A Yes.
18 Q Anything else?	18 Q And for how long have you been doing this,
19 A Nope.	19 Ms. Candy?
20 Q When you say you run the typesetting, can you	20 A Since 1984, minus the two years when I was doing the
21 educate me on the subject? What exactly are you	21 other.
22 talking about?	22 Q And when you were working along with your husband?
23 A Well, they used to -- before computers have to set	23 A Uh-huh.
24 type to, for invitations. They're a direct mail	24 Q Is that right? What about your husband? Is he
25 firm. So to do their letters, their brochures.	25 involved in any way in political fund raising?
10	12

1 A Well, as I said, he has a direct mail firm, so he
2 does no work in Wisconsin.
3 Q He does not?
4 A No.
5 Q Has he ever done any work for any politician here in
6 Wisconsin?
7 A He works for Senator Kohl and has done work,
8 although I do not believe he's ever been paid, from
9 Mayor Norquist.
10 Q When did he do work for Mayor John Norquist?
11 A He's been involved in all his campaigns.
12 Q Every campaign?
13 A Yes. Less so in the first one but in all of them.
14 Q And is it your sworn statement here that he has
15 never received compensation from Mr. Norquist?
16 A I don't -- I can't -- I don't know.
17 Q You're not able to tell me that?
18 A No.
19 Q Have you ever coordinated fund raisers with your
20 husband for any local politician?
21 A Senator Kohl.
22 Q Senator Kohl. What years? Is that ongoing?
23 A Uh-huh.
24 Q Is that yes?
25 A Yes.

13

1 Q When he worked for Mr. Norquist, do you recall the
2 period of time? When was the last time that he
3 performed any type of political fund raising or any
4 type of political work on behalf of Mr. Norquist?
5 A I think he was -- the last time was in the last
6 campaign.
7 Q And let's talk about that. Tell me when did the
8 last campaign begin and when it ended.
9 A It ended on election day.
10 Q Which was? You should be aware that I live in
11 Madison, Wisconsin.
12 A Right, right.
13 Q And, you know, this is totally unnecessary for the
14 record, but just like Milwaukee doesn't care what's
15 going on in Madison, Madison doesn't care a lot
16 about what's going on in Milwaukee.
17 A I don't remember. It was the first April in -- the
18 first Tuesday in April of 2000.
19 Q April of 2000?
20 A Yes.
21 Q Do you know when the campaign began to actually,
22 when the campaign kicked, started to work on
23 Mayor Norquist's re-election campaign?
24 A Well, I'm always working on it.
25 Q Working on it?

14

1 A Yes.
2 Q But for the last election campaign, was that
3 something that you had been doing?
4 A Yes.
5 Q An ongoing basis?
6 A Yes.
7 Q You were constantly representing his interest; is
8 that correct?
9 A Constantly raising money, yes.
10 Q All right. Can we agree that when I mention the
11 word the last re-election campaign, we are
12 addressing the re-election campaign which concluded
13 in April of the year 2000?
14 A (No verbal response)
15 Q Let me just quickly give you a little direction here
16 so as not to place your attorney in a tough
17 predicament. Your attorney cannot assist you --
18 A Okay.
19 Q -- in formulating any answers.
20 A Okay.
21 Q And I would never claim that he would. But it's
22 important that the client understands that.
23 A Okay.
24 Q Very often clients who are not lawyers tend to look
25 around and say you know the date. Unfortunately,

15

1 the record needs to be clear.
2 A Okay.
3 Q And this has to be your testimony and only your
4 testimony.
5 A Okay.
6 MR. ARELLANO: Is that okay,
7 counsel?
8 MR. FINERTY: That's fine. And I
9 would remind you, you know, try and say yes or
10 no audibly so the microphone can pick it up.
11 THE WITNESS: Okay.
12 MR. ARELLANO: I think you're doing
13 very fine. But thank you, counsel.
14 MR. FINERTY: I was going to say,
15 just relax. You're doing all right.
16 MR. ARELLANO: Anyway, I've got the
17 tough job. I'm the one who has to come up
18 with some questions. All right.
19 Q So is it fair and accurate to say that when I use
20 the term the last re-election campaign, you and I
21 will understand that I'm referring to the April 2000
22 last re-election campaign?
23 A Yes.
24 Q Is that okay?
25 A Yes.

16

1 MR. ARELLANO: Am I loud enough for
2 you, Mr. Schrimpf?
3 MR. SCHRIMPF: Yes, fine.
4 MR. ARELLANO: Thank you.
5 Q Now you mentioned that your husband also worked
6 during that campaign?
7 A Worked is not a term I'd use. He helped in that
8 campaign.
9 Q Do you -- again I think you may have answered this
10 question in a rather general fashion. Did your
11 husband receive any type of compensation for the
12 contribution?
13 A Not that I'm aware of.
14 Q Do you have any idea as to how much time
15 percentage-wise he invested, I'm speaking of your
16 husband, he invested in assisting Mr. Mayor's
17 political re-election?
18 A It was a volunteer thing on his personal time.
19 Q Do you have a clue as to the percentage of time that
20 he --
21 A Maybe two hours a week.
22 Q I have to ask you these questions because I just
23 want to put your husband and you in proper context.
24 A Right.
25 Q Do you have any children?
17

1 A Yes.
2 Q How old is the youngest child?
3 A 15.
4 Q So you do have some home responsibilities in
5 addition to working for Mr. Norquist?
6 A Right.
7 Q Is that correct?
8 A Right.
9 Q What type, if you know, what type of work was your
10 husband doing on behalf of Mayor Norquist for the
11 last re-election campaign?
12 A Strategy.
13 Q Why don't you, if you can, give me a structure or a,
14 some sort of a diagram of all of the political
15 campaign staff for Mayor Norquist for the last
16 re-election.
17 A You mean paid people or --
18 Q Both. Let's start with the paid people.
19 A Okay.
20 Q Let's give them priority.
21 A Okay.
22 Q Who was the director of the political campaign?
23 A Bill Christofferson.
24 Q Is his name William Christofferson, if you know?
25 A Yes, yes.
18

1 Q Was he the director of the campaign?
2 A Yes.
3 Q Who else was involved in the paying aspect of the
4 campaign?
5 A Myself.
6 MR. SCHRIMPF: I'm sorry, I didn't
7 hear that.
8 THE WITNESS: Me.
9 MR. SCHRIMPF: Oh.
10 Q Anyone else?
11 A Yes, Michelle McGrorty.
12 Q Could you for the record spell the name?
13 A Michelle, M-C-G-R-O-R-T-Y.
14 Q Anyone else?
15 A Wendy Kukuk.
16 Q Is that C-O-K?
17 A It's K, I think it's K-U-K-U-K.
18 Q Anyone else?
19 A That's all I'm aware of. There were some --
20 Marilyn.
21 Q Okay. Staff, Mayor's staff?
22 A Pardon me?
23 Q Some of the staff that worked for the Mayor?
24 A Just Marilyn I believe.
25 Q Marilyn Figueroa, okay.
19

1 A There were people hired that I never met --
2 Q Okay.
3 A -- who were field organizers.
4 Q And can we add your husband as well?
5 A No.
6 Q No?
7 A No.
8 Q Even though he participated in the campaign?
9 A Right, right.
10 Q But he was not getting paid?
11 A No.
12 Q But he was working for the campaign?
13 A Advising.
14 Q I suspect you, if there were any planning or
15 strategy meetings, you would participate?
16 A That's not necessarily the case.
17 Q But in some cases you did?
18 A In some cases I did.
19 Q Is that right?
20 A Yes.
21 Q Do you recall some of the meetings where you
22 participated to deal with the strategy?
23 A Yes.
24 Q And again we're talking about the last
25 re-election --
20

1 A Yeah, right, right.
2 Q -- of 2000, okay. I suspect most of the strategy
3 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
9 being from Madison, is it fair and accurate to say
10 that Mr. Christofferson would be the one making all
11 the calls as far as strategy and so on and so forth
12 for the last re-election of Mayor Norquist?
13 A I think there was more. There was some input. I
14 mean it wasn't unilateral.
15 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;
18 is that correct?
19 A Right. And there were posters and media people.
20 Q And as far as the Mayor's staff, other than
21 Marilyn Figueroa, do you recall who, if anyone else,
22 participated -- actually participated in the
23 campaign?
24 A As an employee?
25 Q Correct.

21

1 A Nobody.
2 Q What about as a volunteer?
3 A I think everybody kind of helps.
4 Q Okay. Mr. Soika participated as well?
5 A Who?
6 Q Mr. Michael Soika?
7 A Not that I encountered.
8 Q Do you know Mr. Soika?
9 A Yes.
10 Q What about other staff members other than
11 Ms. Figueroa that may have participated in the
12 re-election of Mayor Norquist?
13 A I think everybody volunteered.
14 Q Everybody, okay. Did you have any staff, and I'm
15 talking Mayor Norquist staff members, did you have
16 any of them assigned to work with you in fund
17 raising activities?
18 A Assigned?
19 Q To work, to coordinate?
20 A Well, Marilyn helped me.
21 Q Marilyn helped you?
22 A Yes.
23 Q Let's talk about Marilyn. How long have you known
24 Marilyn Figueroa?
25 A Since she came to work in the Mayor's office. Was

22

1 that '92 I believe.
2 Q How would you characterize or describe your
3 familiarity with Marilyn Figueroa?
4 A Could you be more specific?
5 Q Yes. How would you describe or characterize your
6 relationship with Marilyn Figueroa?
7 A I think in the first year she was there I didn't
8 know her that well, and I think we became, we worked
9 more together.
10 Q What about by the end of December of 1999 as the
11 campaign was ongoing?
12 A Right.
13 Q How would you characterize your relationship with
14 Marilyn Figueroa?
15 A I would say pretty good.
16 Q Pretty good?
17 A Yes.
18 Q In your opinion, based on your observation and
19 knowledge, did you consider Ms. Figueroa a hard
20 working individual?
21 A Yes.
22 Q In your opinion based on what you observed of
23 Marilyn Figueroa, was she a team player when she
24 worked with you at least?
25 A When she worked with me, yes.

23

1 Q Oh, okay. Did you in any way provide direction to
2 Marilyn Figueroa as you were handling the functions
3 of a fund raiser?
4 A Well, we worked together.
5 Q I understand that. But I suspect you were the fund
6 raiser for Mayor Norquist?
7 A Right.
8 Q Did she assist you in any way in raising money for
9 the Mayor?
10 A Absolutely.
11 Q Do you recall any specific projects that she was
12 assigned to or that she worked on to raise money for
13 Mayor Norquist?
14 A Yes. She worked on at least one, if not two,
15 Hispanic events for the Mayor: One at Christmas
16 time. She also did a central city African-American
17 event.
18 Q Anything else?
19 A We were starting on some other projects.
20 Q Like which ones?
21 A Jay Walia, which was an Indian, and again it's more
22 Hispanic.
23 Q Anything else?
24 A No.
25 Q Those are the projects that clearly come to mind --

24

1 A Right.
 2 Q -- when it comes to Marilyn Figueroa and fund
 3 raising activities; is that right?
 4 A Right. She also would help -- when we'd get large
 5 fund raisers, she would help.
 6 Q Like which large fund raisers?
 7 A Well, we do a yearly event that she would help with.
 8 We did things like fish frys, which were lower
 9 dollar events which she would help with.
 10 Q The last one, I'm sorry, could you read that back.
 11 (Last part of the answer read)
 12 Q What do you mean by lower dollar event?
 13 A Where you're trying to get a lot of people there for
 14 10, 15, \$20.
 15 Q Small amounts?
 16 A Yes.
 17 Q Is that correct?
 18 A Right.
 19 Q With respect to the first events that you cited
 20 dealing with a Hispanic or the Afro-American
 21 community or the Indian community, was she primarily
 22 responsible for putting all those together?
 23 A Yes.
 24 Q The lower dollar amount, was she the primary source
 25 or was she just assistant?

25

1 A These were team efforts of a lot of people.
 2 Q All right. Any other activities that you recall
 3 working with Ms. Figueroa?
 4 A No, this was pretty much --
 5 Q This is pretty much it? Okay. Let me go back to
 6 my -- back to the group that were pretty much in
 7 control of the political campaign. You mentioned
 8 Mr. Christofferson and then you mentioned Michelle?
 9 A Right.
 10 Q What's her role? Is that a he or she?
 11 A That's a she. She was a campaign manager.
 12 Q Can you just -- I'm sorry, I never participated in a
 13 political campaign. But can you tell me what a
 14 campaign manager is supposed to do?
 15 A She was supposed to every day make the stuff happen
 16 that needed to happen. She oversaw the day-to-day.
 17 Q Is she still working for Mayor Norquist's campaign?
 18 A She works for Senator Chvala.
 19 Q In Madison?
 20 A Yes.
 21 Q She's closer to me, good. Is it fair and accurate
 22 to say that this political campaign team had some
 23 sort of a structure as far as leadership was
 24 concerned?
 25 A Yes.

26

1 Q Is that correct?
 2 A Yes.
 3 Q And is it fair and accurate to say that
 4 Mr. Christofferson would have been the director of
 5 the entire team; is that correct?
 6 A Yes.
 7 Q Where would Michelle fall? Would she assist
 8 Mr. Christofferson?
 9 A Yes.
 10 Q Is that right? Where would you fall? You were
 11 pretty much --
 12 A On my own.
 13 Q -- independent?
 14 A On my own.
 15 Q You were the one with the money?
 16 A Right.
 17 Q But you did coordinate things with
 18 Mr. Christofferson; is that correct?
 19 A More or less. I'm pretty independent.
 20 Q I suspect Mr. Norquist was also involved in this
 21 campaign team as well; is that right?
 22 A Yes.
 23 Q I've just got to get you to say --
 24 A Yes, yes, yes.
 25 Q And I suspect he was involved in meetings related to

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1 strategy, planning and so on and so forth?
 2 A Not always but --
 3 Q But obviously he needed to be informed; is that
 4 correct?
 5 A Yes, yes.
 6 Q That's all right.
 7 A Yes.
 8 Q It's taken me all these years to learn that. No
 9 problem.
 10 Was there any individual responsible for
 11 dealing with the press?
 12 A I think Bill dealt with the press.
 13 Q Mr. Christofferson. And was there anyone involved,
 14 and some of this -- I know a lot of these questions
 15 may sound real silly to you, but I'm trying to get
 16 some education on this issue. Was there any
 17 individual involved in marketing per se?
 18 A I don't know what you mean by that.
 19 Q Announcements, ads, political pamphlets,
 20 distribution of literature related to the Mayor.
 21 A I mean the campaign, Michelle would have done that.
 22 Q Michelle would have done that.
 23 A Yeah.
 24 Q Do you recall whether or not there were any type of
 25 ads or any marketing done through the Internet

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1 during his political re-election?
 2 A I don't know.
 3 Q If there was any, who would have been responsible
 4 for that aspect?
 5 A I assume Bill and Michelle.
 6 Q Okay, very good. Now, during your last re-election
 7 campaign who would you say were your largest
 8 contributors for Mr. Norquist, in Wisconsin?
 9 A You want names?
 10 Q Yes. I mean it's public information.
 11 A Right, right.
 12 Q But you can go ahead and tell me right now.
 13 A I don't know if I can remember.
 14 Q Well, mention the top.
 15 A Oh, Dan Katz.
 16 Q How do you spell the last name?
 17 A K-A-T-Z.
 18 Q Anyone else?
 19 A We had a large number of people who gave the amount,
 20 the largest amount you could give. Mr. Finerty is
 21 one of our largest donors.
 22 Q Any corporations?
 23 A No. They can't give.
 24 Q I would ask anyway.
 25 A Okay. I wish they could.

29

1 Q What about any top executive from any of the local
 2 newspapers?
 3 A No.
 4 Q So if I were to look for any donor from the
 5 Milwaukee Sentinel or any executive or member of any
 6 of those organizations, in your view I wouldn't find
 7 any?
 8 A No. Can I clarify that?
 9 Q Yes.
 10 A I do not know who's on the board of the
 11 Journal, Sentinel. So I'm not going to say that
 12 somebody from the corporate board did not.
 13 Q Okay, very good. Any other company or individual
 14 that, other than the ones that you just mentioned
 15 here, that you recall may have given substantial
 16 amount of money to the campaign?
 17 A Well, there are a substantially large number of
 18 people who gave a lot of money.
 19 Q Like more than a hundred?
 20 A I'd say 50 to 75.
 21 Q 50 to 75. And who would have those records?
 22 A I have them. Our treasurer has them which is
 23 Reinhart, Boerner, Van Dueren.
 24 Q Did you bring any of those records with you today?
 25 A I brought a list of the Mayor's largest donors, yes.

30

1 MR. ARELLANO: Do you have that
 2 with you?
 3 MR. FINERTY: Yes.
 4 MR. ARELLANO: That probably will
 5 save us some time.
 6 MR. FINERTY: Yes. Let's take a
 7 second.
 8 (Discussion off the record)
 9 MR. ARELLANO: I am sensitive to
 10 your concerns, counsel, for Ms. Candy, but let
 11 me give you the assurance that came in the
 12 form of an order from the judge. None of
 13 these documents can be released to the public
 14 until the day of the hearing. And I suggest
 15 that if there will be any objections, that
 16 those objections be raised on the day of the
 17 hearing. None of these records will be -- in
 18 fact I have somewhat refused to let the City
 19 touch anything because anyone can get them
 20 from the City, and I'm trying to find a way.
 21 I personally feel that none of these records
 22 would be released until May 6th which is the
 23 day of the trial. In the meantime, you can
 24 allow me to read them. I don't want to read
 25 them right now because of the limited time

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1 that she has. But I will be mindful and will
 2 offer you the opportunity to think about it.
 3 I would review them, and if I find them of
 4 absolutely no value, unless the City objects,
 5 I would be willing to stipulate that they can
 6 be removed. Is that comfortable enough for
 7 you?
 8 MR. FINERTY: That's fair enough.
 9 Barbara, do you understand that?
 10 THE WITNESS: Yes.
 11 MR. FINERTY: Can you also today
 12 give us the original back and mark a
 13 photocopy, or take a photocopy along marked as
 14 Exhibit 1-A, for example?
 15 MR. ARELLANO: Here's my problem,
 16 sir. You can -- if you want that, you can do
 17 that because I don't have access to any
 18 copier. This is a colleague of mine, but I'm
 19 not sure that I want to overburden this law
 20 firm with a substantial amount of copies.
 21 We're working on a large case. You can get
 22 them done.
 23 MR. FINERTY: Sure. Actually my
 24 office is in the other tower.
 25 MR. ARELLANO: That's what I

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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 Q 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 can just go get it. No problem.	6 A Yes.
7 MR. FINERTY: I don't know how to	7 Q 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 A I do not know.
10 and if I start giving her different	10 Q 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.	12 A Because I don't have that list.
13 MR. FINERTY: I was going to go	13 Q Who would have that list?
14 over to my office and she could give somebody	14 A 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.	16 Q And who would that be?
17 MR. ARELLANO: All right. That's	17 A His name is Peter Turner.
18 fine. Anyway, let me ask you to mark these	18 Q 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	21 Q How are these individuals paid? Let's talk about
22 Exhibit No. 1?	22 you, for example.
23 MR. ARELLANO: Exhibit No. 1 which	23 A Uh-huh.
24 has not been introduced, counsel, is the	24 Q How are you compensated?
25 subpoena duces tecum that we sent to	25 A On a monthly salary.
33	35
1 Ms. Candy. But I'm kind of slow and it takes	1 Q And the salary comes from which funds?
2 me time to do things.	2 A The campaign funds.
3 (Exhibit No. 2 marked for	3 Q And who is the record keeper of the campaign funds?
4 identification)	4 A Steven Jacobs at Reinhart, Boerner, Van Deuren.
5 Q Let me show you, Ms. Candy, what has been marked as	5 Q Is he an attorney?
6 Exhibit No. 2 of your deposition. And just for the	6 A Yes.
7 record, can you please state or describe what this	7 Q And I suspect the same answer would apply for
8 Exhibit 2 purports to represent?	8 Mr. William Christofferson, he gets paid from the
9 A It's a list of people who give Mayor Norquist \$250	9 same fund?
10 or more a year.	10 A Yes.
11 Q Very good. And those are all of the records that	11 Q Is that correct?
12 you have within your possession and that you have	12 A Yes.
13 produced today pursuant to my subpoena?	13 Q Is Mr. Christofferson still actively involved in the
14 A Right.	14 political works of Mr. Norquist?
15 Q Is that correct? Okay. Let me take a look at those	15 A You mean is he paid?
16 records. Are these pages numbered? Yes, they are.	16 Q Well, first of all, is he still working there?
17 A Yes, they are.	17 A He's not paid.
18 Q Let the record reflect that Exhibit No. 2 contains a	18 Q But is he still working there? Is he doing any work
19 total of 64 pages. Is that accurate?	19 on behalf of Mayor Norquist?
20 A Yes.	20 A I don't know. I know he's no longer receiving a
21 Q Okay, very good.	21 salary.
22 To your knowledge, are any members or	22 Q I didn't quite get that last.
23 contributors to Mayor Norquist's political	23 A He's no longer receiving a salary.
24 re-election of the year 2000 who may not be in this	24 Q Do you know, if you know, when he stopped receiving
25 list of names that you provided to me today which	25 any type of salary?
34	36

1 A I would say the end of the summer, but I have to say
 2 I'm not sure about that.
 3 Q For the year, for this last re-election campaign,
 4 just a ballpark figure, you were the primary money
 5 getter; is that correct?
 6 A Right.
 7 Q Can you give me some ballpark figure as to how much
 8 you caused the Mayor to obtain through
 9 contributions?
 10 A How much did the Mayor raise?
 11 Q Right.
 12 A Over a million dollars.
 13 Q For the last re-election --
 14 A Yes.
 15 Q -- did there come a time when issues of concern
 16 regarding the Mayor's behavior or politics or
 17 opinions became a concern to any of the contributors
 18 with whom you worked?
 19 A You're going to have to repeat that.
 20 Q Okay. During the last re-election campaign, to your
 21 knowledge, do you recall whether or not any of the
 22 contributors ever questioned or had any concerns
 23 about rumors regarding Mayor Norquist?
 24 A Expressed to whom?
 25 Q Expressed to you.

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1 A Concerns is too strong a word.
 2 Q They were curious?
 3 A Curious.
 4 Q Okay, very good. And to your knowledge, how many
 5 people raised the issue, if there was any, regarding
 6 Mayor Norquist's rumors about his personal life?
 7 A I don't know how to quantify that.
 8 Q Several?
 9 A Yes.
 10 Q Many?
 11 A Yes.
 12 Q Is that correct?
 13 A Yes.
 14 Q Did there come a time when some of these
 15 contributors hesitated to support the Mayor because
 16 of some rumors?
 17 A Not the people I dealt with, no.
 18 Q Is that correct? Anyone that you know of that may
 19 have changed their position with respect to whether
 20 or not they would support the Mayor during the last
 21 re-election campaign because of rumors?
 22 A Not from my personal experience, okay.
 23 Q And these rumors that we haven't talked about, I
 24 suspect these concerns were raised before he was
 25 finally re-elected; is that correct?

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1 A Yes.
 2 Q Did some of these concerns develop in 1999 during
 3 the campaign?
 4 A No. Not from what I -- not from what I experienced.
 5 Q What period of time do you recall, when was the
 6 first time that some of these rumors or concerns
 7 were brought to your attention?
 8 A February of 2000.
 9 Q Is there one individual -- and you don't have to
 10 disclose that name if you don't want to, at least
 11 for now. Is there any one specific contributor that
 12 was more than just curious to know what was going
 13 on?
 14 A No.
 15 Q Tell me some of the comments that you would get in
 16 February 2000 regarding some of the rumors that you
 17 were --
 18 A People just wondered what was going on.
 19 Q And what did you understand that they wanted to
 20 know?
 21 A People were asking about Marilyn.
 22 Q Tell me, as best as you can as you sit here under
 23 oath, tell me verbatim some of the comments that
 24 they would relate to you, best as you can.
 25 A They just were asking about the Mayor's and

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1 Marilyn's relationship.
 2 Q Anything else?
 3 A No.
 4 Q And the first time -- is it your testimony today
 5 that the first time that these concerns were raised
 6 regarding Marilyn and the Mayor's, his relationship
 7 with Marilyn I suspect, that happened for the first
 8 time in February of 2000?
 9 A As I remember it, not like February 1st but
 10 sometime.
 11 Q During the early part of 2000?
 12 A Well, that's not -- yeah, I would say.
 13 Q Is that right? But before he was finally
 14 re-elected?
 15 A Yes.
 16 Q True?
 17 A I'm comfortable saying before he was re-elected,
 18 yes.
 19 Q Okay. Do you recall in 1999 anyone raising the same
 20 concerns?
 21 A To me?
 22 Q Correct.
 23 A No, not that I recall.
 24 Q Did you ever hear via third or fourth parties any
 25 concerns related to that specific issue?

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1 A No.
 2 Q You personally, Ms. Candy, when was the very first
 3 time that you raised that question, if you ever did?
 4 Did you ever think about that issue that was being
 5 raised in early 2000, what is going on between the
 6 Mayor and Marilyn Figueroa?
 7 A Did I ever think about it?
 8 Q Right.
 9 A In what way?
 10 Q In a rather questionable way.
 11 A Personally?
 12 Q Yes.
 13 A No, not at that point.
 14 Q Did there come a time when you did?
 15 A No.
 16 Q Ever?
 17 A No.
 18 Q Is there a reason why it never crossed your mind
 19 after, after you learned from some contributors that
 20 they were curious to know what was going on?
 21 A Because John's John. I mean I just didn't think he
 22 would do that.
 23 Q You didn't think he would do that?
 24 A Yes.
 25 Q All right. When did you -- strike that. Some of

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1 the people that raised this issue with you regarding
 2 John Norquist and Marilyn Figueroa back in
 3 February of 2000 but before he was re-elected, and I
 4 understand you don't want me to hold you to a
 5 specific date?
 6 A Right, right, right.
 7 Q And I understand that. Did anyone ever tell you how
 8 they learned of these rumors, what led them to
 9 question this particular relationship?
 10 A It just seemed to be out there. People were talking
 11 about it.
 12 Q When did you sense for the first time that this
 13 rumor was out there?
 14 A It had to have been February or March.
 15 Q In February or March when these contributors would
 16 talk to you and raise this issue, what response
 17 would you give them, if any?
 18 A That I didn't think he would do that.
 19 Q How long have you known Mr. John Norquist,
 20 Ms. Candy?
 21 A Since 1987.
 22 Q And are you familiar with, or friends with his
 23 spouse?
 24 A Yes.
 25 Q And what's her name?

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1 A Susan Mudd.
 2 Q Did you know Ms. -- did you know Susan -- let me
 3 call her Susan. I don't want to mispronounce her
 4 last name. Did you know her before you met
 5 Mr. Norquist?
 6 A No.
 7 Q Is it fair and accurate to say that you met her
 8 through Mr. Norquist?
 9 A Yes.
 10 Q Is that correct?
 11 A Yes.
 12 Q All right. Did you ever socialize with Mr. Norquist
 13 and his wife?
 14 A Yes.
 15 Q Visited each other's homes?
 16 A Occasionally.
 17 Q Had dinner?
 18 A Yes.
 19 Q Went out together?
 20 A Yes.
 21 Q Is that correct?
 22 A Yes.
 23 Q In February or March of the year 2000 just before he
 24 became re-elected, your reaction at least in your
 25 mind at that time was that you didn't think he would

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1 ever do that?
 2 A No.
 3 Q Is that correct?
 4 A That's correct.
 5 Q And again, I don't think I was clear or I didn't
 6 hear you clearly. What, if any, response did you
 7 provide to those contributors that were concerned or
 8 raised inquiries about the relationship?
 9 A I didn't believe any of the rumors were true.
 10 Q So is it fair and accurate to say that you would
 11 then deny it when --
 12 A Yes.
 13 Q -- they would imply it?
 14 A Yes.
 15 Q You would deny that?
 16 A Yes.
 17 Q Before the re-election of Mayor Norquist, and I'm
 18 talking about the re-election of 2000 but prior
 19 these rumors coming to your attention or even
 20 crossing your mind in any way, how would you
 21 describe your relationship with Mr. Norquist?
 22 A I don't know. That's a tough one. I spend a fair
 23 amount of time with him, but I wouldn't say we're
 24 very close. I don't think he's close to a lot of
 25 people.

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1 Q How would you describe his personality? Just your
2 own opinion.
3 A An awkward personality I think is the word that
4 comes to mind.
5 Q Prior to January of 2000 did you recall any one time
6 when Mr. Norquist, at least you felt Mr. Norquist
7 was not honest with you, where you felt that you
8 were compromising your respectful position in this
9 community? Do you recall any one time when you felt
10 that you were placing your name in the middle of
11 a --
12 A No.
13 Q -- difficult situation?
14 A No.
15 Q Inversely, up to but -- up to January of 2000 but
16 prior to learning some of these rumors or about
17 these rumors, did you think that John Norquist
18 should have disclosed that information to you before
19 anybody else came with these rumors, given your
20 working relationship with him?
21 A Should he have told me about Marilyn?
22 Q Correct.
23 A I've had mixed feelings about this. Initially, yes,
24 I did think so.
25 Q Well, it was a fact that he was a married man?

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1 A Yes.
2 Q In February of 2000?
3 A Yes.
4 Q Correct?
5 A Yes.
6 Q And it was a fact that in January and
7 February voters and contributors were concerned
8 about an extramarital affair that he was having with
9 Ms. Figueroa; true?
10 A Concerned is too strong a word.
11 Q Well, they were curious.
12 A Okay.
13 Q Is that correct?
14 A Yes.
15 Q And you would agree with me, would you not, that for
16 a person of his caliber in his position, that could
17 become a political problem?
18 A Yes.
19 Q Especially for you in your capacity as a contributor
20 or at least fund raiser?
21 A Right.
22 Q True?
23 A Yeah.
24 Q Because many contributors would want to know who
25 they are supporting regardless of whether we like

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1 their morality or their philosophy, that became a
2 problem for you?
3 A Could have become, yes, yes.
4 MR. ARELLANO: Can we just take a
5 two-minute break, counsel.
6 (Discussion off the record)
7 By Mr. Arellano: (Continuing)
8 Q Mrs. Candy, do you recall -- would it be really
9 unfair of me to ask you to identify this exhibit
10 which contributors questioned you about
11 Mr. Norquist's alleged relationship with
12 Ms. Figueroa before he was re-elected in 2000?
13 A I couldn't even tell you.
14 Q You could not. Any specific name that comes to
15 mind, to save you some time?
16 A No specific. You know, I would be out. People
17 would ask me about it.
18 Q Did this issue, the Norquist/Figueroa rumors, did
19 that become an ongoing obstacle for you sort of
20 speaking?
21 A It wasn't an obstacle.
22 Q But did that become some sort of a distraction
23 during your fund raising activities?
24 A It was something to be dealt with, yes.
25 Q When these issues were raised or brought to your

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1 attention as you were trying to raise money for
2 Mr. Norquist, did you ever discuss those issues with
3 Mr. Christofferson?
4 A No.
5 Q Did you inquire with any of the campaign staff about
6 these issues --
7 A No.
8 Q -- before he was re-elected?
9 A No.
10 Q Did you ever discuss it, as you sit here under oath,
11 did you ever discuss it with your husband?
12 A Yes.
13 Q What did you discuss with your husband? And I'm
14 talking about the period before he was re-elected.
15 A Re-elected. We talked about whether it could
16 possibly be true.
17 Q What was your husband's take on it?
18 A That he didn't think so either.
19 Q Did you discuss it with any member of Mr. Norquist's
20 staff before he was re-elected? And I'm again
21 referring to this rumor, the Norquist-Figueroa
22 rumors.
23 A Ruth Wyttenbach and I may have talked about it.
24 Q What is your recollection as far as your discussion
25 with Ruth?

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1 A Just I think we both found it to be an impossible.
 2 Q Situation? Do you recall, when this conclusion was
 3 arrived at between Ruth and you, do you recall
 4 approximately the time period when this discussion
 5 took place?
 6 A February, March.
 7 Q Of the year 2000? And just so the record is clear,
 8 can you explain to us who is Ruth?
 9 A Ruth is the Mayor's assistant and scheduler.
 10 Q And the last name spells?
 11 A Wyttenbach, W-Y-T-T-E-N-B-A-C-H.
 12 Q Boy, I'm testing your recollection right now. Okay,
 13 good. I'm going to call her Ruth so I don't
 14 massacre her last name. Did Ruth conclude, based on
 15 your recollection, did she verbally conclude or
 16 opine that she didn't think that this could be
 17 possible?
 18 A Yeah.
 19 Q Is that what she said to you?
 20 A Yes, yes.
 21 Q Did there come a time before he was re-elected when
 22 you actually became concerned about the truthfulness
 23 of these rumors?
 24 A No.
 25 Q Is that because of your conviction that you didn't

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1 think he would be engaged in something like this?
 2 A Yes.
 3 Q Is that correct?
 4 A Yes.
 5 Q Prior to his re-election did anyone from the
 6 campaign staff, volunteers as well as paid
 7 individuals, did anyone ever raise the same
 8 concerns --
 9 A No.
 10 Q -- prior to his re-election?
 11 A No.
 12 Q Is there a reason why you didn't give, if you
 13 didn't, why you didn't give any importance to these
 14 rumors before he was re-elected?
 15 A It's just my perception of the nature of his
 16 personality.
 17 Q You were just convinced that he would not do that?
 18 A Right. And my belief, and my affection for his
 19 wife.
 20 Q Are you close to his wife?
 21 A We're friends.
 22 Q Would you consider her a close friend?
 23 A No.
 24 Q Did you at any point develop serious concerns about
 25 his wife?

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1 A No.
 2 Q Or how these rumors regarding the alleged
 3 relationship with Ms. Figueroa would affect her?
 4 A How the rumors would affect her?
 5 Q Yes.
 6 A I wasn't aware of what she knew.
 7 Q Did you ever discuss it with her?
 8 A No, absolutely not.
 9 Q Prior to his re-election, other than the
 10 contributors whose names you don't recall, anyone
 11 else that may have raised that issue during the
 12 re-election campaign but before he actually was
 13 re-elected that may have raised the same issue, the
 14 allegations of Ms. Figueroa having a relationship
 15 with him?
 16 A Raised in what way?
 17 Q In any way.
 18 A Well, I'm sure my friends did, Marge, you know.
 19 Q Prior to his re-election did anyone ever share with
 20 you any specific evidence about whether or not there
 21 was an actual relationship going?
 22 A No.
 23 Q Do you recall whether or not during the re-election
 24 campaign any of the news media, and by that I
 25 include everyone from the Internet, the web, local

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1 newspapers, television, you name it, any news media
 2 that may have published anything with respect to
 3 these alleged rumors before he was re-elected in
 4 2000?
 5 A I don't recall whether anything was published.
 6 Q Do you recall whether or not, and mind you that I
 7 don't know who the players were --
 8 A Right.
 9 Q -- coming in here --
 10 A Right.
 11 Q -- fresh relying on your truthfulness, which I
 12 believe you have been, do you recall whether or not
 13 the opposition, if there was any, ever raised this
 14 allegation of an extramarital affair on the part of
 15 John Norquist before he was re-elected?
 16 A I believe they had a press conference.
 17 Q Is that correct?
 18 A I believe.
 19 Q And who do you know that did that who had the press
 20 conference?
 21 A George Watts, I believe.
 22 Q Just to tell you how much I know, was George Watts
 23 the opponent?
 24 A Yes.
 25 Q What is your recollection of that press conference?

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1 What were the allegations that he was making?
 2 A I don't know.
 3 Q What's the gist of what you believe he was saying?
 4 A That John was involved with something.
 5 Q And something?
 6 A In some way. I did not pay a lot of attention to
 7 it.
 8 Q When you say something or some way, did you conclude
 9 he was referring to an extramarital relationship?
 10 A I believe so. As I said, I did not pay a lot of
 11 attention to it.
 12 Q Do you recall approximately when this press
 13 conference occurred?
 14 A It was right before the election, maybe the week
 15 before the election.
 16 Q And is it your sworn testimony, Ms. Candy, that
 17 before he was elected you never once discussed it
 18 with Mr. Christofferson?
 19 A No, I didn't.
 20 Q And did he ever raise any issues of concern
 21 regarding these alleged rumors with you?
 22 A He, who?
 23 Q Mr. Christofferson?
 24 A No.
 25 Q Is it fair and accurate to say -- and I think you

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1 already said this but I just want to make sure that
 2 I am clear on the record. Is it fair and accurate
 3 to say that before Mr. Norquist was elected you
 4 received, or several individuals questioned you on
 5 this alleged extramarital relationship; is that
 6 correct?
 7 A Yes.
 8 Q And is it fair and accurate to say so I don't
 9 torture you on this issue, that's not my intent --
 10 A Okay, okay.
 11 Q -- is it also fair and accurate to say that you
 12 denied that at all times --
 13 A Yes.
 14 Q -- before he was re-elected?
 15 A Yes.
 16 Q So even though you may not remember who may have
 17 asked you about this extramarital relationship, it's
 18 fair and accurate to say that you were denying it
 19 all the time?
 20 A Yes.
 21 Q Is that correct?
 22 A Yes.
 23 Q Before he was re-elected but after you began to hear
 24 these concerns or questioning about his extramarital
 25 relationship alleged, did you ever actually talk to

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1 Mr. Norquist about these rumors?
 2 A No, no.
 3 Q Prior to his re-election?
 4 A No.
 5 Q To this date have you ever discussed this
 6 relationship with Mr. Norquist?
 7 A No.
 8 Q You do know now that the Mayor has come out and
 9 acknowledged that he had an extramarital
 10 relationship with Ms. Figueroa?
 11 A Yes.
 12 Q Correct?
 13 A Yes.
 14 Q When was the very first time that you learned that
 15 in fact the Mayor was having an extramarital
 16 relationship?
 17 A At the press -- when he had the press conference.
 18 Q Is it your sworn testimony that before he held a
 19 press conference with his wife on his side you did
 20 not know that Mayor Norquist had in fact engaged --
 21 A Right.
 22 Q -- in sexual acts with Ms. Figueroa?
 23 A Right.
 24 Q Is that correct? When he had the press conference
 25 after you learned that he was acknowledging that

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1 fact, what was your reaction?
 2 A I was horrified.
 3 Q And why is that?
 4 A I felt betrayed, let down.
 5 Q Did the fact that the Mayor disclosed this alleged
 6 behavior or behavior now, it's no longer alleged --
 7 A Right.
 8 Q -- did that make you feel bad about all the denials
 9 that you engaged in when people were questioning
 10 you?
 11 A Bad, stupid, yeah.
 12 Q Did you feel that he owed you honesty when you were
 13 generating funds and you were addressing his
 14 interest to the public of Milwaukee, that he should
 15 have come to you and say this is what's going on so
 16 you are aware and you are not being surprised?
 17 A No, I didn't.
 18 Q You didn't?
 19 A No. Initially, yes.
 20 Q But you just finished telling us that you felt
 21 stupid?
 22 A Uh-huh.
 23 Q And you're being too harsh on yourself. I don't --
 24 I'm just repeating your words.
 25 A Gullible.

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1 Q You felt that way because Mayor Norquist had not
2 been honest; correct?
3 A Right.
4 Q Other than Marilyn Figueroa, did you ever hear from
5 any source about any other rumors involving the
6 Mayor and any other woman?
7 A No.
8 Q Since the Mayor disclosed his conduct to the public,
9 have you spoken to his wife about these issues?
10 A No.
11 Q Have you had any contact with his wife since he came
12 out?
13 A Yes.
14 Q And is it your testimony that you have never
15 discussed --
16 A Never.
17 Q -- these issues with her?
18 A Never.
19 Q Did she ever make any comments to you?
20 A Never.
21 Q About these issues?
22 A Never.
23 Q Is that in your opinion unusual?
24 A No.
25 Q I mean you've been pretty close to Mayor Norquist

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1 for years; isn't that correct?
2 A Right.
3 Q You have had access to his office whenever you need
4 to?
5 A Right.
6 Q True?
7 A Yes.
8 Q You have generated millions of dollars for
9 Mayor Norquist?
10 A Yes.
11 Q Is that correct?
12 A Yes.
13 Q You've been loyal to Mayor Norquist?
14 A Yes.
15 Q Yet you didn't feel he was being loyal to you by not
16 disclosing this information before his re-election,
17 true, since you felt so terrible when you found out
18 he came out? Is that a yes?
19 A That's an I don't know.
20 Q Did this discovery about his sexual conduct have any
21 impact in your relationship with him?
22 A I've seen him far less.
23 Q Have you built some distrust as a result of this
24 disclosure?
25 A No, I wouldn't say that.

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1 Q Before he became public, when he held that press
2 conference, do you recall approximately when was
3 that?
4 A December.
5 Q Of last year?
6 A 2000.
7 Q Of 2000?
8 A Yes.
9 Q Is that correct?
10 A Yes.
11 Q Were you ever involved in any planning meetings with
12 Mr. Norquist or Mr. Christofferson to address these
13 allegations just before --
14 A No.
15 Q -- he became public?
16 A No.
17 Q Did anyone including Mr. Christofferson ever call
18 you and tell you what was going to happen?
19 A No, no, no.
20 Q How close are you to Mr. Christofferson?
21 A Very.
22 Q You are very close to him?
23 A Yes.
24 Q You feel confident that he would be truthful to you?
25 A Yes.

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1 Q How long have you known him?
2 A I met him when I met the Mayor, 1987.
3 Q In January, February or March before Mayor Norquist
4 was re-elected in 2000, if Mr. Christofferson would
5 have known about this extramarital relationship,
6 would you have expected, given your relationship
7 with Mr. Christofferson, would you have expected him
8 to come and tell you?
9 A No.
10 Q Why is that?
11 A Because I'd have probably quit.
12 Q Do you, based on what you know of
13 Mr. Christofferson, do you think that he would have
14 kept this secret relationship, if he knew about it
15 he would have kept it secret from his staff, his
16 campaign staff?
17 A Yes.
18 Q And why, what leads you to say that?
19 A I just believe he would have.
20 Q On what basis?
21 A So we would all keep doing our jobs.
22 Q To this date, do you know if Mr. Christofferson knew
23 of Mr. Norquist's alleged relationship before he was
24 re-elected in the year 2000?
25 A I believe at some point he did, yes.

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1 Q Before or after?
 2 A Before or after what?
 3 Q Before Mr. Norquist was re-elected or after?
 4 A I believe before, but I don't know when.
 5 Q What leads you to say that?
 6 A He's told me he knew before.
 7 Q When was the last time that you spoke with him about
 8 this issue?
 9 A About when he knew and stuff?
 10 Q Right.
 11 A Immediately after the press conference.
 12 Q What did he tell you?
 13 A That he knew at some point.
 14 Q Where was this discussion held?
 15 A I believe it was on the phone.
 16 Q How did the whole conversation develop over this
 17 issue?
 18 A Well, I think he felt I was angry at him for not
 19 telling me about it.
 20 Q You were angry at Mr. Christofferson?
 21 A Yes.
 22 Q Did you let him know that?
 23 A Yes.
 24 Q And what was his response?
 25 A He just didn't think he should. And he was, I

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1 think, was right.
 2 Q I understand that. But I'm asking you to tell me
 3 what he told you. Why didn't he disclose that
 4 information to you?
 5 A Because he didn't think he should.
 6 Q Did he tell you that he had promised Mr. Norquist
 7 not to disclose it?
 8 A No, no.
 9 Q Did he explain to you on what basis he made the
 10 judgment not to disclose that to you?
 11 A No.
 12 Q Did he ever tell you when he learned --
 13 A No.
 14 Q -- of that fact?
 15 A No.
 16 Q If I understood you, you called him and told him
 17 that you were upset about the whole situation?
 18 A Yes.
 19 Q And I hate to say this because I don't want to put
 20 you in a tough predicament, but I sense that you are
 21 still very upset about the fact that you didn't know
 22 about this thing.
 23 A I'm still upset about the whole situation.
 24 Q Are you upset about the fact that he engaged in this
 25 type of behavior or that you didn't know about the

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1 behavior?
 2 A The behavior.
 3 Q Do you think that Mr. Christofferson had known about
 4 this for years?
 5 A No.
 6 Q How much time do you think he had to know about this
 7 matter before Mr. Norquist came out?
 8 A I don't know.
 9 Q Do you have any information, Ms. Candy, as to who
 10 suggested to Mayor Norquist to come out and claim
 11 that this was a consensual relationship?
 12 A No, no.
 13 Q Do you suspect Mr. Christofferson?
 14 A I don't have any way of knowing.
 15 Q You did not participate in any meetings?
 16 A No.
 17 Q Of any kind?
 18 A None.
 19 Q How long have you been married to your husband?
 20 A 27 years.
 21 Q Is this the only marriage you ever had?
 22 A Yes.
 23 Q Is that right? Your husband, is this the only
 24 marriage he ever had?
 25 A Yes.

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1 Q Congratulations. I suspect given your sworn
 2 testimony today that if anyone knew about this
 3 relationship before his re-election, it certainly
 4 wasn't you?
 5 A That's right.
 6 Q You never learned that from Ms. Figueroa; correct?
 7 A No.
 8 Q You never learned that from Mr. Norquist?
 9 A Right.
 10 Q Correct? Have you ever worked on any projects for
 11 the City of Milwaukee where you have received
 12 compensation directly from the City of Milwaukee?
 13 A No.
 14 Q So is it fair and accurate to say that all of the
 15 work that you have done for John Norquist has been
 16 paid by the political campaign --
 17 A Yes.
 18 Q -- organization?
 19 A Yes.
 20 Q Is that correct? All right. Have you ever -- I'm
 21 not looking for any violations of any kind. I just
 22 want to understand your relationship with his
 23 office.
 24 A Okay.
 25 Q I couldn't care less if you use a secretary or two.

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1 But did you ever work, other than Marilyn Figueroa,
2 did you ever work with any of his staff members at
3 any point for any reason?
4 A Can you define worked?
5 Q Worked meaning that they did work for you, they sent
6 you emails, you used their office?
7 A You mean help in the campaign?
8 Q Correct.
9 A Yes.
10 Q And would that include all of the staff members?
11 A You mean over all the years?
12 Q Correct.
13 A No, not all of them.
14 Q Most of them?
15 A Some of them. Some of them aren't interested.
16 Q Mr. Soika, was he involved in the political
17 re-election of Mr. Norquist?
18 A Not on my part.
19 Q For the year 2000?
20 A Not on my part.
21 Q Did you have much contact with Mr. Soika?
22 A No, no.
23 Q Do you recall ever socializing with Ms. Figueroa,
24 going out to lunch, doing things together?
25 A We may have gone out to lunch, have a drink.

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1 Q Do you recall any one time before January of 2000
2 when Marilyn Figueroa may have shared with you
3 complaints about not being reclassified at work?
4 A No, I don't recall if we ever talked about that. I
5 don't think so.
6 Q Do you recall sometime in 1998 when Ms. Figueroa
7 kind of left, quit the job? Do you remember ever
8 talking to her?
9 A No.
10 Q Ever calling her and asking her to come back to
11 work?
12 A No.
13 Q Ever telling her that you felt she was a good
14 worker?
15 A No.
16 Q Do you recall ever hearing from Ms. Figueroa
17 complaints about discrimination within the Mayor's
18 office with respect to committees, input, et cetera?
19 A No. You mean technical discrimination?
20 Q Correct.
21 A No.
22 Q Do you recall any complaints of any nature that
23 Marilyn Figueroa may have shared with you throughout
24 the years since you have known her?
25 A We've had many conversations, yes, I'd say.

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1 Q Tell me some of the complaints that she shared with
2 you.
3 A That there was a, predominantly there was an inner
4 circle of people and then there was those not in
5 that inner circle of people. And that was a
6 changing, depending on whom, who was there.
7 Q And how did she describe this separation or
8 differences?
9 A On staff level I believe.
10 MR. SCHRIMPF: I'm sorry, I didn't
11 hear.
12 THE WITNESS: On staff level. You
13 know, there was the senior staff and then
14 there --
15 Q Do you recall ever hearing Marilyn Figueroa --
16 strike that. When she was sharing with you these
17 concerns about the inner circle, did you take that
18 as some sort of a complaint or something that she
19 didn't like the way things were inside the office?
20 A Yes.
21 Q Is that correct? Do you recall during -- did she
22 make that known to you several times?
23 A Yes.
24 Q Is that correct? Do you recall any one time when
25 Marilyn Figueroa used the word the Hispanic box or

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1 the Spanish box within the Mayor's office?
2 A To me?
3 Q Yes.
4 A No.
5 Q When she was complaining to you about the inner
6 circle, did she identify some of this circle as the
7 minority versus the nonminority group?
8 A I don't think so. I don't recall.
9 Q What exactly did you conclude or what exactly did
10 you perceive she was complaining about when she
11 mentioned to you the inner circle dynamics within
12 the Mayor's office?
13 A I think -- I don't understand the structure of how
14 the City government works and these classifications
15 and stuff. I don't know anything about this, but I
16 think people with higher classifications and larger
17 salaries had more access, more power.
18 Q Did she ever complain to you -- did you ever
19 perceive that she was complaining as a woman, as a
20 Hispanic, as a minority? Did you ever perceive that
21 to be the case?
22 A No, no.
23 Q When Marilyn Figueroa was doing political
24 campaigning for Mayor Norquist, to your knowledge,
25 was she getting paid from the political campaign or

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1 was she getting paid from the City? If you know.
 2 A I don't know for sure. She was supposed to be
 3 getting paid, starting to get paid from the campaign
 4 part-time. But I don't know if that ever happened.
 5 Q And again, if I need to get those records, those
 6 records don't belong to the City? The political
 7 campaign records do not belong to the City?
 8 A They're filed at the elections commission at the
 9 City.
 10 Q As to who was working on the political campaign?
 11 A Yes, yes.
 12 Q Okay, thank you. Do you recall in the year of 2000
 13 and the preceding year late 1999, do you recall
 14 working with Marilyn Figueroa on the political
 15 re-election campaign?
 16 A Yes, yes.
 17 Q Did you have constant contact with Ms. Figueroa?
 18 A Not constant but we were working on some stuff.
 19 Q In 1999, December to be more exact --
 20 A Yes.
 21 Q -- did you have any contact with
 22 Ms. Marilyn Figueroa?
 23 A Yes.
 24 Q What about November of 1999?
 25 A I think we were at some meetings.

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1 the troops were going full steam and working hard?
 2 A December I would say.
 3 Q That would have been December?
 4 A Yes.
 5 Q And I suspect November was kind of picking up as
 6 well?
 7 A Right.
 8 Q Is that right?
 9 A Right.
 10 Q Do you recall ever observing Marilyn Figueroa either
 11 in November or December based on your observation,
 12 your way of looking at things, as stressed out,
 13 upset?
 14 A Yes.
 15 Q Okay.
 16 A Yes.
 17 Q Did you ever see Marilyn Figueroa during any of
 18 those two months crying or having any type of
 19 discomfort --
 20 A No.
 21 Q -- at all? Do you recall anytime when
 22 Marilyn Figueroa would not make it to meetings or
 23 would not come because of stress, what you perceived
 24 to be stress?
 25 A I wouldn't -- I wouldn't, no, not from my --

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1 Q Political campaign meetings?
 2 A Right, right.
 3 Q Is that correct? Was Marilyn assigned to any
 4 specific section of the political campaign staff?
 5 A I think she was supposed to be doing organizing and
 6 stuff.
 7 Q Was she assigned to a specific group, Hispanic or
 8 anything?
 9 A I don't know.
 10 Q But the only specific fund raisers that you remember
 11 she was assigned to were the ones that you mentioned
 12 earlier --
 13 A Right.
 14 Q -- right after you were sworn? The one with the
 15 Hispanic community, the Afro-American community, the
 16 Indian community; is that correct?
 17 A Yes, yes.
 18 Q I know, I know. That's the joy of a lawyer, to
 19 catch the witness nodding, you know. I mean it's a
 20 powerful way to say you've got to answer yes or no.
 21 All right. Let's talk about 1999. Are you
 22 able to tell me what period of time, keeping in mind
 23 that the political campaign re-election would end in
 24 March of 2000 or so, what aspect of those months was
 25 the busiest time of the political campaign or where

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1 Q When you testified that it was your perception that
 2 Marilyn Figueroa was under a lot of stress, how
 3 would you characterize that? How did you reach that
 4 conclusion? On what basis?
 5 A We had a meeting, and then we talked afterwards and
 6 she seemed upset.
 7 Q And did you ever exchange any opinions as to what
 8 was making her upset?
 9 A We talked about it. We talked about the campaign.
 10 There were people in the campaign that neither she
 11 nor I were wild about working with. And that's
 12 what.
 13 Q Did she complain about again the inner circles of
 14 the Mayor's campaign?
 15 A No, no, no, no.
 16 Q Do you recall any one time when Ms. Figueroa went
 17 home upset suddenly because of stress or abdominal
 18 pains, discomfort?
 19 A No.
 20 Q In November and December did you have any slight
 21 idea that there were some rumors about
 22 Mayor Norquist and Figueroa?
 23 A No.
 24 Q November or December?
 25 A No, uh-uh.

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1 Q Do you have any recollection as to when
2 Marilyn Figueroa stopped working for the City?
3 A No.
4 Q Did you learn that in January -- did you learn in
5 January that Marilyn Figueroa had walked out of the
6 job?
7 A Yes.
8 Q How did you learn that?
9 A I learned that she wasn't there from the Mayor.
10 Q The Mayor told you that?
11 A Yes.
12 Q Where did he tell you this?
13 A In my office.
14 Q Where is your office?
15 A My office is on Marshall Street.
16 Q He came to visit?
17 A He came there. I mean that's where we worked.
18 Q He was visiting on a regular basis?
19 A Yes.
20 Q And where did this conversation occur, right in your
21 main office where your desk is located?
22 A Right.
23 Q Is that correct?
24 A I should clarify. This is his fund raising office.
25 This is Citizens for Norquist fund raising office.

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1 Q Where is that located?
2 A 819 Marshall.
3 Q And how did the issue get raised?
4 A It got raised because I asked about Marilyn because
5 we were working on this stuff and I couldn't find
6 her.
7 Q What did you say?
8 A I asked him, you know, what happened, where was she,
9 you know.
10 Q What did he tell you? Tell me as verbatim as you
11 can recall, what did he respond?
12 A That she was upset about her job, I believe, and at
13 that point didn't know if she was coming back.
14 Q This is what he said to you?
15 A Yes.
16 Q I'm comfortable with you, but she's the important
17 one here. When he stated to you that she was upset
18 about the job and did not know if she was coming
19 back, were there any other comments or words
20 exchanged?
21 A No.
22 Q Were you surprised that he was telling you that he
23 did not know if she was coming back?
24 A Yes.
25 Q Did you inquire why he felt that way?

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1 A It just -- I don't know. I don't recall very
2 clearly the conversation. I was quite concerned
3 about Marilyn.
4 Q You were quite concerned?
5 A Yes.
6 Q Why is that?
7 A Well, because I wanted her to come back. I liked to
8 work with her.
9 Q And I should say even though this is not part of
10 this case, she feels the same way, okay? But in any
11 event, you were concerned about Marilyn?
12 A Yes.
13 Q What was raising those concerns, if anything? What
14 were you concerned about Marilyn?
15 A The last, the time I saw her, the last time I saw
16 her was a few days before Christmas when we had this
17 meeting, and as I said, she was upset. The event we
18 were working on was in the second week I believe of
19 January and I did not know the people. She knew the
20 people. And all of a sudden she was gone. And I
21 didn't know what had -- I didn't know what had
22 happened to her, whether she was coming back and
23 working on this or what.
24 Q Let me ask you to assume that Marilyn Figueroa
25 walked out on January the 4th of the year 2000. How

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1 soon after that January 4th did the Mayor come and
2 talk to you?
3 A The Mayor generally is with me every morning, was
4 during that re-election campaign.
5 Q So is it possible that he came to see you on the
6 4th?
7 A Yes.
8 Q The same day she left?
9 A Yes.
10 Q Did he say anything else other than what you just
11 told me?
12 A No.
13 Q And again, you mentioned you don't remember what
14 else you may have said, but do you recall whether or
15 not you pursued this inquiry as to why she was
16 leaving or why she was not coming back?
17 A With him?
18 Q Yes.
19 A I'm sure I asked a couple more times that week what
20 was going on.
21 Q How was his demeanor as you were asking him those
22 questions?
23 A The same as he always is.
24 Q Which is?
25 A You know, that's the way it is.

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1 Q I don't know him.
 2 A Okay.
 3 Q I have never met him.
 4 A Okay. He just was not real forthcoming and didn't
 5 want to talk about it I think is the best way.
 6 Q I'm trying to imagine your description of the way he
 7 is, but I have to ask you this question. When he
 8 related to you that Marilyn had left the job because
 9 she was upset about the job and did not know if she
 10 was coming back, how would you describe his demeanor
 11 as he was telling you that?
 12 A Perfectly normal.
 13 Q Normal. Do you know -- up to that time did you know
 14 for how long Marilyn had worked for John Norquist?
 15 Do you know how many years she had been --
 16 A I think she came in 1992 after that election
 17 campaign.
 18 Q Were you surprised that a person that had been
 19 working there for close to 10 years all of a sudden
 20 the Mayor was telling you she may not come back?
 21 A No, because I think she had issues with, in there.
 22 Q And the issues that you believe she had related to
 23 what?
 24 A The job.
 25 Q The job?

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1 A Yes.
 2 Q Other than -- did that issue ever get raised again
 3 between you and the Mayor?
 4 A No.
 5 Q The fact she was gone?
 6 A No.
 7 Q Did there come a time at some point that you learned
 8 that Marilyn Figueroa was hospitalized?
 9 A I think so.
 10 Q How soon after she left that you learned that she
 11 had been hospitalized?
 12 A In January.
 13 Q Now, you testified that it was customary, or at
 14 least the practice that the Mayor would come and see
 15 you every morning. How did you learn that she was
 16 hospitalized? Did the Mayor share that information
 17 with you as well?
 18 A No.
 19 Q How did you learn that fact?
 20 A I don't know. I don't remember.
 21 Q Well, did you ever ask the Mayor in one of your
 22 meetings what's going on with Marilyn, why is she in
 23 the hospital?
 24 A No.
 25 Q Did there come a time when you learned at some point

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1 that Marilyn had some type of nervous breakdown?
 2 A I don't think I was aware of that at the time at
 3 all.
 4 Q Did there come a time when you did become aware of
 5 that fact?
 6 A Much later.
 7 Q Meaning how many months?
 8 A I can't even say. I don't know. I don't remember.
 9 Q Did you discuss Marilyn's -- strike that. Is it
 10 fair and accurate to say that the way you learned
 11 about Marilyn leaving the job was rather abrupt;
 12 correct?
 13 A Yes.
 14 Q And did you form any ideas or questions what's going
 15 on here after the Mayor informed you that she had
 16 left the job?
 17 A Not that I recall, not that I recall.
 18 Q You mentioned that before he was re-elected in 2000,
 19 January, February when people began to question this
 20 behavior on the part of the Mayor, I believe you
 21 testified that -- and I want to give you the
 22 opportunity to clarify this. I heard you to say
 23 that you never questioned the Mayor before he was
 24 re-elected.
 25 A Right.

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1 Q Was that important to you at all, to know whether or
 2 not the man that you were generating thousands of
 3 dollars was engaged in an extramarital relationship?
 4 Was that important at all to you?
 5 A No, no.
 6 Q So can you tell me, Ms. Candy, how you reconciled --
 7 I mean you are vividly upset about all of this;
 8 true?
 9 A Yes.
 10 Q Is that true?
 11 A Yes.
 12 Q Can you tell me how you reconciled being so upset
 13 about finding out that he was having an extramarital
 14 relationship or he had engaged in sexual conduct
 15 outside the house and never having questioned him
 16 about that?
 17 A You have to understand that I didn't believe he did
 18 it.
 19 Q So it was not that you were playing I don't want to
 20 know; you just were convinced that this man would
 21 not do that?
 22 A Right.
 23 Q Is that correct?
 24 A Right.

MR. ARELLANO: Let me go off the

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1 record for a minute.
 2 (Discussion off the record)
 3 (Last two questions and answers read)
 4 Q Now, let's talk about after his re-election which
 5 would have been February, March of the year 2000; is
 6 that correct?
 7 A After?
 8 Q Right.
 9 A It was April of 2000.
 10 Q In other words, he was re-elected sometime in April?
 11 A April, yes.
 12 Q Now, and you also are aware by virtue of your prior
 13 sworn testimony, that Mr. Norquist decided to, at
 14 least in his view, disclose this relationship with
 15 Ms. Figueroa was a consensual relationship sometime
 16 in December of 2000; correct?
 17 A Yes.
 18 Q And again, I believe your testimony before this
 19 morning was that that was the first time that you
 20 actually learned that there was in fact some type of
 21 sexual exchange with Ms. Figueroa and Mr. Norquist?
 22 A Yes.
 23 Q Is that correct? Now, after April of 2000, after he
 24 was elected, did anyone ever raise these alleged
 25 rumors of his sexual relationship between

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1 Mr. Norquist and Ms. Figueroa but before December,
 2 before he came out and disclosed himself?
 3 A Raise them?
 4 Q With you.
 5 A Certainly. The rumors continued all summer and all
 6 fall.
 7 Q And did you ever change your position at all before
 8 he came out and disclosed it on December, whenever
 9 that was?
 10 A No.
 11 Q You continued to deny --
 12 A I continued to deny.
 13 Q -- that these rumors were true? From April of 2000
 14 after he was re-elected but to December before he
 15 came public, did you ever talk to Mayor Norquist
 16 about these rumors?
 17 A No.
 18 Q Did you ever talk to Mr. Christofferson --
 19 A No.
 20 Q -- about these rumors?
 21 A No.
 22 Q You did state that at some point you spoke to
 23 Mr. Christofferson --
 24 A Right.
 25 Q -- about these rumors and that he confided in you

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1 that he knew?
 2 A Yes.
 3 Q Did he ever tell you for how long he had known about
 4 these rumors?
 5 A No.
 6 Q Did you ask him how long have you known about this?
 7 A No.
 8 Q Here's my question to you. When did you actually
 9 talk to Mr. Christofferson about what he knew?
 10 A You mean this conversation?
 11 Q Correct.
 12 A It would either have been the weekend after the
 13 press conference or at the beginning of the next
 14 week.
 15 Q Okay. So did you ever bring any of these
 16 allegations to the attention of Mr. Christofferson
 17 before December, before Mr. Norquist had his press
 18 conference where he acknowledged the relationship?
 19 A Did I tell Bill about the rumors?
 20 Q Right.
 21 A No.
 22 Q Did you ever tell anybody other than your husband?
 23 A Well, the people I worked with.
 24 Q Who, for example? Who did you talk to?
 25 A About the rumors?

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1 Q Right.
 2 A My husband, people, Ruth, people like that.
 3 Q Did any of these individuals including Ruth ever
 4 change their opinion about these rumors before
 5 December of 2000 when the Mayor became public with
 6 it?
 7 A I don't know. Not Ruth I know.
 8 Q Did there come a time before December, before
 9 John Norquist decided to come out and acknowledge
 10 that, did there come a time when these rumors
 11 increased? Let's talk about fluctuations here.
 12 A Not to my knowledge.
 13 Q Are you familiar with a person by the name of
 14 Marge Beil?
 15 A Yes.
 16 Q Who is Marge Beil?
 17 A She's a community activist who works at LaCasa.
 18 Q How long have you known Ms. Beil? Am I pronouncing
 19 her last name properly?
 20 A Since, oh, I don't know, 1992 maybe, 90.
 21 Q Have you worked on projects together?
 22 A Yes.
 23 Q Did she work on political campaigns with you?
 24 A Yes, yes.
 25 Q Is it fair and accurate to say that you have known

84

1 her for at least 10 years?
 2 A Yes.
 3 Q Or more?
 4 A Yes.
 5 Q Is that correct? Have you ever known Ms. Beil to
 6 lie or have a reputation of dishonesty?
 7 A I've known her to embellish.
 8 Q But have you ever known anyone to claim that she has
 9 the tendency to lie as opposed to embellish?
 10 A No.
 11 Q With respect to embellishing, tell me some specific
 12 illustrations, if there are any, that would support
 13 your contention that Ms. Beil tends to embellish.
 14 A I can't think of specific things. She is dramatic.
 15 Q Do you know any men in your life who tend to be
 16 dramatic?
 17 A Certainly.
 18 Q How would you characterize Mr. Norquist?
 19 A Not dramatic.
 20 Q Do you consider him emotional?
 21 A No.
 22 Q Do you consider him harsh?
 23 A Harsh? Sometimes.
 24 Q Have you ever known anyone that has complained about
 25 Mr. Norquist's retaliatory conduct?

85

1 A Yes.
 2 Q What types of complaints have you heard regarding
 3 his retaliatory conduct?
 4 A I think that if you do something he doesn't like,
 5 you can get on the wrong side of him.
 6 Q Has this Figueroa-Norquist situation in any way
 7 affected your trust in Mr. Norquist?
 8 A It's affected our relationship.
 9 Q Has this incident in any way affected your feelings
 10 towards Marilyn Figueroa?
 11 A No.
 12 Q Have you ever had lunch with Marge Beil?
 13 A Yes.
 14 Q And did there come a time before the Mayor became
 15 public acknowledging this conduct of his. When you
 16 and Ms. Marge Beil had lunch and discussed
 17 Mr. Norquist?
 18 A Yes.
 19 Q Did you ever communicate with Ms. Beil via Internet,
 20 email?
 21 A Jokes.
 22 Q Tell me in the year 2000, did there come a time when
 23 you had lunch with Marge Beil and discussed
 24 John Norquist and Marilyn Figueroa?
 25 A Yes.

86

1 Q Tell me what's your recollection. Let's talk about
 2 the month or the period of time.
 3 A Well, I have lunch with Marge.
 4 Q Countless times?
 5 A Countless times in 2000. Are you asking about the
 6 December lunch?
 7 Q Well, anytime when you may have discussed
 8 Mr. John Norquist but before Mr. Norquist came
 9 public.
 10 A I don't remember specifically.
 11 Q But you do recall talking to her about --
 12 A Yes.
 13 Q -- the Norquist-Figueroa situation?
 14 A Yes, yes.
 15 Q And you recall talking to her before Mr. Norquist
 16 became public?
 17 A Yes.
 18 Q And what was the nature of your discussion?
 19 A She obviously believed Marilyn and I obviously
 20 believed the Mayor, so we argued about those things.
 21 Q You took the position that you didn't believe
 22 Marilyn's complaints and allegations; is that
 23 correct?
 24 A This was not about Marilyn in my mind. This was
 25 about John.

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1 Q Right. Inversely --
 2 A Right, right.
 3 Q Well, let me rephrase it. I understand the context
 4 that you're giving me in your question. Your answer
 5 is that you were not really questioning Marilyn, but
 6 you were focusing on whether or not John would be
 7 engaged in something like this; is that correct?
 8 A Yes, yes, yes.
 9 Q And as I understand based on your answer, Ms. Beil
 10 took sides saying I believe Marilyn Figueroa?
 11 A Yes, yes.
 12 Q And did you give Ms. Beil any reason or support for
 13 the position that you took?
 14 A No, other than she knew John and just didn't seem in
 15 his nature.
 16 Q Did you at any point provide any information to
 17 Ms. Beil about inquiries that you may have
 18 undertaken to investigate whether or not these
 19 rumors were true? Did you ever share that
 20 information?
 21 A No.
 22 Q Did you ever follow up with Ms. Beil on this issue,
 23 the Figueroa-Norquist issue, after that lunch
 24 meeting that you held with her before Mr. Norquist
 25 became public? Did you ever write her on email?

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1 Did you ever talk to her on the phone?
 2 A I don't recall.
 3 Q What about after Mr. Norquist became public? Do you
 4 recall touching bases with Ms. Beil?
 5 A Yes.
 6 Q Tell me the nature -- specifically to address the
 7 Norquist-Figueroa thing? Is that yes?
 8 A Yes.
 9 Q She needs your answer.
 10 A Yes.
 11 Q Tell me what was the nature of your contact with
 12 Ms. Beil after Mr. Norquist became public.
 13 A I think that I called her immediately when I'd heard
 14 Marilyn went to the hospital and said did you know
 15 Marilyn went to the hospital. I think that was my
 16 first contact.
 17 Q Do you recall approximately when that would have
 18 been, when that call would have been made?
 19 A I don't remember. That was a stressful weekend for
 20 me. No, I don't remember exactly. But it was as
 21 soon as when I heard it on the news.
 22 Q And was that after the day when the Mayor became
 23 public?
 24 A I believe so. That's my recollection, but I --
 25 Q Did you call Marge or did she call you?
 89

1 A I called Marge.
 2 Q To let her know that you had become aware that
 3 Marilyn had gone to the hospital?
 4 A Yes.
 5 Q Did you do that after the Mayor had become public
 6 with his story? Is that yes?
 7 A Yes.
 8 Q Was there any reason that led you to call Ms. Beil?
 9 A I knew she was very concerned about Marilyn.
 10 Q Were you concerned about Marilyn?
 11 A Yes, yes.
 12 Q When you learned about the Mayor's press conference,
 13 the details of his disclosure and the fact that
 14 Marilyn had gone to the hospital, how did you react
 15 to those two incidents?
 16 A I was horrified.
 17 Q Why?
 18 A I felt terrible. My husband felt terrible. My
 19 phone was ringing off the hook.
 20 Q Did you share with Ms. Beil any thoughts or opinions
 21 about your disappointment about what you had
 22 learned?
 23 A In the phone conversation?
 24 Q Yes.
 25 A No.
 90

1 Q Did you at some point later on?
 2 A Yes.
 3 Q Tell me when was the next time that you talked about
 4 that.
 5 A I think I saw her the next week and we talked about
 6 this.
 7 Q Where did you talk to her?
 8 A At Ms. Katie's Diner.
 9 Q Tell me the nature of the discussion.
 10 A I just felt betrayed and unhappy, and we talked
 11 about that.
 12 Q If Ms. Beil were to testify that you sent an email
 13 stating how upset you were at Mr. Norquist because
 14 he had lied to you, would that be out of the
 15 question?
 16 A No. But I don't --
 17 Q You were upset?
 18 A I don't recall sending emails.
 19 Q But nevertheless you were upset?
 20 A Terrifically upset, yes.
 21 Q You felt he had lied to you?
 22 A Yes.
 23 Q Were you at all surprised to learn that -- strike
 24 that. Before the Mayor became public did you recall
 25 reading any articles or information through the
 91

1 media, any source of media about the fact that
 2 Ms. Figueroa had filed a complaint with the EOC?
 3 A Yes. But I don't read the newspaper.
 4 Q I understand that. Just so you understand, that
 5 complaint, the EOC complaint was never and has never
 6 been disclosed to the public, so you would not have
 7 read the details. But you do recall reading an
 8 article to the fact that Marilyn Figueroa had filed
 9 a complaint with the EOC?
 10 A Yes.
 11 Q Is that correct?
 12 A Yes.
 13 Q And that was long before the Mayor decided to go
 14 public with his version of this relationship; is
 15 that correct?
 16 A Right, I think so.
 17 Q Then at some point in December -- no, sometime in
 18 December he decided to come out public and
 19 acknowledge this relationship based on his version;
 20 correct?
 21 A Yes.
 22 Q And I think shortly thereafter the Mayor had another
 23 press conference where he disclosed the actual
 24 complaint that Ms. Figueroa had filed with the Equal
 25 Rights Division. Do you recall that?
 92

1 A Very vaguely.
 2 Q In fact, I think that if I can put things in proper
 3 perspective, I would assume or submit to you that
 4 the hospitalization of Marilyn occurred not when the
 5 Mayor went public --
 6 A Okay, okay.
 7 Q -- but when the actual complaint and the specific
 8 allegations were made public by Mr. Norquist.
 9 A Okay.
 10 Q Do you recall that?
 11 A Yes.
 12 Q So putting it chronologically, putting it together
 13 in proper context, is it fair and accurate to say
 14 that before he came out publicly with his version of
 15 a consensual relationship, you already had heard in
 16 the media that Marilyn had filed the first
 17 complaint?
 18 A I believe so, yes.
 19 Q Is that correct?
 20 A I believe so.
 21 Q Did you reach any conclusions, opinions as to why
 22 the Mayor waited until after Marilyn had filed the
 23 complaint to go public with his version?
 24 A No.
 25 Q To this date did you reach any conclusions as to his

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1 Q -- in trying to determine how to deal with the
 2 press?
 3 A No.
 4 Q Is that correct? Was Mr. Christofferson, based on
 5 your knowledge of how Mr. Norquist worked, his
 6 re-election campaign, was Mr. Christofferson the
 7 person assigned to deal with the press in most
 8 cases?
 9 A In most cases.
 10 Q Is that right? Okay. It is also my perception,
 11 based on your representation today, that somehow for
 12 whatever reason you were kept out of the loop with
 13 respect to this little secret?
 14 A I did not know about it.
 15 Q And I don't mean to belittle it when I say little
 16 secret, but certainly you were kept out?
 17 A That's right.
 18 Q As you sit here giving us this truthful testimony,
 19 did you ever request to be kept out, not wanting to
 20 get involved --
 21 A No.
 22 Q -- in any of these rumors? Do you have any reason
 23 to believe that others within the campaign
 24 organization were also kept out of the loop other
 25 than you?

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1 timing?
 2 A No.
 3 Q Did anyone ever tell you or share with you any
 4 strategy of what was being done?
 5 A No.
 6 Q To your knowledge, was Mr. Christofferson involved
 7 in the planning of all these press conferences?
 8 A In December?
 9 Q Yes.
 10 A I don't know.
 11 Q Would this be something that he would be involved in
 12 based on what you know of him?
 13 A I don't know what -- I truly don't know what his
 14 involvement was at that point.
 15 Q And I don't want to place you in a difficult legal
 16 predicament here, but I sense from the
 17 representations you have made here today that you
 18 did not participate in any strategy meetings on how
 19 to deal with these rumors?
 20 A That's right.
 21 Q Is that accurate?
 22 A That is accurate.
 23 Q I will not find later on that you were at some of
 24 those meetings --
 25 A No.

94

1 A You mean the paid campaign?
 2 Q Correct, correct.
 3 A None of us knew.
 4 Q And what leads you to say that?
 5 A Having talked to the people in the campaign after
 6 December, after his press conference.
 7 Q Who did you talk to?
 8 A Michelle.
 9 Q Who else? Nobody else?
 10 A The paid? No.
 11 Q What was Michelle's reaction when you spoke to her
 12 about these issues?
 13 A We were both stunned.
 14 Q I don't mean to be sexist, but it appears to me that
 15 the boys knew and the females, women, professional
 16 females were somewhat kept out. Am I getting the
 17 proper picture here or an accurate representation?
 18 A I don't know who knew.
 19 Q Well, one thing is clear is that Michelle did not
 20 know?
 21 A Right.
 22 Q Is that correct? You did not know; correct?
 23 A Right.
 24 Q But Mr. Christofferson did know?
 25 A My husband did not know.

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1 Q Your husband didn't. But your husband was not one
2 of the paid individuals according to your prior
3 testimony?
4 A Right.
5 Q Is that correct?
6 A Right. Michelle is very young though, I mean.
7 Q How young? Young as me?
8 A No. 25 maybe at this point.
9 Q She's just a little younger, okay. Is she still
10 working for the campaign?
11 A As I said, she works for Senator Chvala.
12 Q Yes, you did say that. Is she not involved in the
13 Norquist campaign anymore?
14 A Not at all, not at all.
15 Q Do you know anyone that left the campaign upset or
16 disappointed as a result of this entire matter?
17 A No.
18 Q Did you at any point after the complaint was made
19 public by John Norquist, and I'm talking about the
20 complaint filed by Ms. Figueroa, did you ever read
21 the complaint?
22 A No.
23 Q Did you ever read the newspaper article where the
24 complaint was published?
25 A Vaguely.

97

1 Q Well, I want to understand that. You read it or you
2 didn't?
3 A I skimmed it.
4 Q The newspaper, the local newspaper printed the
5 entire complaint; isn't that true?
6 A I know. I believe so.
7 Q Is that the one that you skimmed?
8 A I believe so.
9 Q You testified earlier that you were seriously
10 affected by this particular matter?
11 A Yes.
12 Q Correct? Is there a reason why you decided not to
13 read it?
14 A I found it very unpleasant.
15 Q What did you find unpleasant?
16 A I find the whole situation unpleasant.
17 Q Did you get at least to read some of the allegations
18 played by Ms. Figueroa?
19 A Did I?
20 Q Yes. Did you get to read those aspects?
21 A Some of them.
22 Q Since you have known Ms. Figueroa in all of the
23 years, do you recall any one time when you and/or
24 others felt that Marilyn Figueroa was not a truthful
25 individual?

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1 A That was not my experience with her certainly.
2 Q That was not?
3 A No. She was a truthful individual.
4 Q Do you recall prior to the disclosure of the
5 complaint -- we're talking about the disclosure that
6 again John Norquist advanced to the newspapers.
7 A Yeah.
8 Q Do you recall any one time when anyone that you know
9 of that was associated in any manner with
10 Marilyn Figueroa, do you recall anyone ever
11 portraying or claiming that Marilyn Figueroa was not
12 a truthful individual?
13 A Not with the people I dealt with.
14 Q Before this entire matter became public, how would
15 you have described Marilyn Figueroa in her way of
16 conducting business?
17 A In her City job?
18 Q Yes.
19 A I did not see a lot of that, but from what I did
20 with Marilyn, she was incredibly competent and she
21 did incredibly well with the stuff she did with me.
22 MR. ARELLANO: We can take a break
23 now. Off the record.
24 (Discussion off the record)
25 (Noon recess)

99

1 By Mr. Arellano: (Continuing)
2 Q Ms. Candy, let's go back to the time when
3 Mr. Norquist in January of 2000 informed you that
4 Ms. Figueroa had left the job and did not know if
5 she was returning. Shortly after that encounter did
6 there ever come a time when you learned that
7 sometime during the month of January and/or
8 February of the year 2000 Marilyn Figueroa was
9 hospitalized?
10 A I don't remember when. I was aware.
11 Q How did you come to know this fact that she was
12 hospitalized?
13 A I don't know.
14 Q Did Mr. Norquist ever share that information with
15 you?
16 A No.
17 Q Did you learn that fact from people within the City?
18 A Perhaps. I don't recall.
19 Q Mr. Christofferson?
20 A No.
21 Q Mr. Soika?
22 A No.
23 Q Is there a reason why you don't remember how you
24 learned of that fact?
25 A Is there a reason? I don't recall.

100

1 Q What did you learn with respect to that incident?
 2 Go ahead.
 3 A That she was in the hospital.
 4 Q And what else, if anything, did you learn as to why
 5 she was in the hospital?
 6 A I didn't learn anything. I didn't know if it was
 7 because she had had previous physical health
 8 problems. I had no awareness it was not a physical
 9 problem.
 10 Q Even though you don't recall the specific source, is
 11 it fair and accurate to say that you learned it from
 12 someone within the City?
 13 A No, not necessarily.
 14 Q Well, you're pretty firm about that?
 15 A Right.
 16 Q Yet you don't seem to recall who or where?
 17 A It could have been somebody with the City. I just
 18 don't know.
 19 Q Could have been the Mayor?
 20 A No. It wasn't the Mayor.
 21 Q To your knowledge, based on your perception, was
 22 this fact known to the City including the Mayor that
 23 she was in the hospital in January and/or February?
 24 A I don't know.
 25 Q When you learned that she was in the hospital, did

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1 you ask in your regular meetings with the Mayor, did
 2 you ever ask him about that fact?
 3 A No.
 4 Q The fact that you learned that she was in the
 5 hospital?
 6 A No.
 7 Q Do you recall, if you know, do you recall for how
 8 long she was in the hospital for that period?
 9 A No.
 10 Q And I'm talking about January and/or February of
 11 2000.
 12 A Right.
 13 Q Did you ever have any contact with Marilyn Figueroa
 14 while she was in the hospital?
 15 A No.
 16 Q Do you know if anyone did?
 17 A No.
 18 Q What about Mr. Christofferson? Did he ever mention
 19 anything to you about, or you mention anything to
 20 him about the fact that you knew she was in the
 21 hospital?
 22 A No.
 23 Q When you learned that she was in the hospital, what
 24 was your understanding as far as her status with the
 25 City was concerned?

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1 A I had no understanding.
 2 Q Did there come a time when you learned that the City
 3 terminated her employment?
 4 A No.
 5 Q Anyone ever talk to you about that fact?
 6 A No.
 7 Q Mr. Christofferson never talked to you about that
 8 fact?
 9 A No.
 10 Q Did you visit the office of the Mayor regularly?
 11 A In what period of time?
 12 Q In January or February of 2000.
 13 A No.
 14 Q By the way, did Ruth ever, Mayor Norquist's
 15 administrative assistant, ever inform you that
 16 Marilyn was in the hospital?
 17 A No.
 18 Q You learned that she was in the hospital, but your
 19 testimony is that you don't know how you learned
 20 that?
 21 A No.
 22 Q You didn't learn it from Marilyn Figueroa, did you?
 23 A No.
 24 Q What about her family?
 25 A No.

103

1 Q We talked extensively about the fact that at some
 2 point Mayor Norquist decided to come open in public
 3 and disclose his version of the relationship; is
 4 that correct?
 5 A Yes.
 6 Q And then we also talked about the fact that at some
 7 point he also disclosed the complaint that was filed
 8 by Marilyn Figueroa with the Equal Rights Division;
 9 is that correct?
 10 A Yes.
 11 Q And what is your understanding as to what
 12 Mayor Norquist was alleging as far as his version of
 13 this relationship is concerned?
 14 A That it was a consensual relationship.
 15 Q And what is your understanding as to what
 16 Marilyn Figueroa was alleging and continues to
 17 allege with respect to that interaction with
 18 Mayor Norquist?
 19 A This is total interpretation.
 20 Q That's fine.
 21 A That initially it may have been consensual, but it
 22 didn't remain that way.
 23 Q And how did you develop that opinion that you just
 24 expressed here today on the record?
 25 A I don't know.

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1 Q Well, did you talk to anyone --
 2 A No.
 3 Q -- close to Marilyn Figueroa?
 4 A No.
 5 Q Now, with respect to the version that the
 6 Mayor Norquist advanced many months later after he
 7 was re-elected and obviously after Marilyn Figueroa
 8 had filed her complaint, do you have any information
 9 or evidence of any kind that would help you to
 10 conclude that Mayor Norquist's version is the
 11 correct version in this case?
 12 A No.
 13 Q And you have not addressed this claim that the Mayor
 14 has made in public with him and/or his wife?
 15 A No.
 16 Q Is that your testimony? So if I were to take the
 17 testimony of Mrs. Norquist or whatever her name is,
 18 you believe that that would be her position?
 19 A Yes.
 20 Q Is that correct?
 21 A Yes.
 22 Q Have you ever given testimony before under oath?
 23 A No.
 24 Q This is your first time?
 25 A Yes.

105

1 Q You've never been involved in any legal proceedings
 2 before?
 3 A No.
 4 Q Nevertheless, you understand that this is sworn
 5 testimony?
 6 A Yes.
 7 Q And I have absolutely no reason to believe that
 8 you're not telling me what you know. After the
 9 Mayor -- I'm just interested in knowing when in the
 10 world you talked to Christofferson when he informed
 11 you that he had some knowledge about the
 12 relationship. Was that before the Mayor went
 13 public?
 14 A No.
 15 Q Or before?
 16 A After.
 17 Q After the Mayor had come public?
 18 A Right.
 19 Q Is that correct? All right. Do you know anyone
 20 anywhere in this world that has shared information
 21 with you about this alleged relationship between
 22 Mayor Norquist and Marilyn?
 23 A I don't know what you mean exactly by that.
 24 Q Anyone that may have made comments to you about what
 25 they may have observed?

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1 A No.
 2 Q Or what they may have heard?
 3 A No.
 4 Q You stated that when Mayor Norquist decided to come
 5 out after Marilyn had filed her complaint with the
 6 EOC on October 11th that you were, I think the word
 7 was shocked and disappointed; is that correct?
 8 A Yes, yes.
 9 Q What about your husband? Did he share any similar
 10 reaction as you did?
 11 A Absolutely.
 12 Q What did he say?
 13 A We were both shocked.
 14 Q What did he say?
 15 A We couldn't believe it.
 16 Q Did he feel as you did that the Mayor had lied to
 17 him as well with respect to this issue?
 18 A He did not have a lot of contact with the Mayor.
 19 Q That wasn't my question.
 20 A No, I don't think so.
 21 Q My question was did he express the same reaction?
 22 You were outraged?
 23 A Yeah.
 24 Q Tell me about Mr. Soika. Did he ever discuss with
 25 you this relationship between Marilyn Figueroa and

107

1 Norquist?
 2 A No. Mr. Soika and I don't talk.
 3 Q You don't have any contact with him, okay. What
 4 about Ruth? Did you ever talk to her after the
 5 Mayor decided to disclose his version after
 6 Marilyn Figueroa had filed a complaint against him?
 7 A Yes.
 8 Q When did you talk to her?
 9 A I can't remember specifically.
 10 Q Tell me the nature -- how many contacts have you had
 11 with her with respect to this particular issue?
 12 A Several.
 13 Q Several. Just tell me how soon after the Mayor
 14 became public with his version of this relationship,
 15 how soon after that did you talk to Ruth about it?
 16 A I would say -- I don't know for sure. I'd say
 17 within a period of a couple weeks.
 18 Q Tell me what, if any, was her reaction to this
 19 development.
 20 A Like myself, absolutely shocked. We've been with
 21 him the longest.
 22 Q Express for the record some of the words that she
 23 expressed.
 24 A That she couldn't believe it. She didn't think he
 25 would do it.

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1 Q Do you know Ruth well?
 2 A Yes.
 3 Q Do you know if Ruth or any other staff member are
 4 afraid of the Mayor?
 5 A Not Ruth.
 6 Q What about you?
 7 A Me? No, no.
 8 Q I like that reaction. Hell, me? No. Okay.
 9 You mentioned earlier that the Mayor has a
 10 reputation of taking a strong reaction to people
 11 that cross him or take the wrong side?
 12 A Yes.
 13 Q Is that correct? Do you know anyone that has ever
 14 been, in your view, affected by the Mayor's anger or
 15 wrath because he or she took a separate view or
 16 different approach to what he would have loved to
 17 have seen?
 18 A There are people who he became angry with, yes.
 19 Q Tell me some of those individuals.
 20 A Do I have to name names?
 21 Q Unfortunately, yes. As you sit here under oath --
 22 MR. FINERTY: Go ahead. This is
 23 going to be sealed.
 24 MR. ARELLANO: Yes.
 25 A Various lobbyists, you know, have had their ups and

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1 downs: Carl Mueller, John Tries, Evan Zeppos.
 2 Q Anyone else?
 3 A That's, you know, that's kind of my world, all
 4 right?
 5 Q Employees that you know of, staff members?
 6 A Steve Agostini.
 7 Q When he came and shared with you the information
 8 that Marilyn had walked out or left the job, given
 9 what you know about his personality and conduct, did
 10 you sense that Marilyn may have gotten on his wrong
 11 side?
 12 A No.
 13 Q Did you form any opinions at all with respect to why
 14 she left?
 15 A No. The Mayor never said anything other than
 16 positive things about Marilyn to me.
 17 Q Up to that point?
 18 A Period.
 19 Q Well, after that January visit that he made, did he
 20 ever mention Marilyn again?
 21 A We never talked about it.
 22 Q So the answer would be no?
 23 A Right.
 24 Q Is that correct? The very next time is it fair and
 25 accurate to say that before he became public with

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1 his version of events as far as his alleged
 2 relationship with Marilyn Figueroa, from the day
 3 that he came to see you in January after he walked
 4 out -- she walked out, excuse me, until he went
 5 public with his press conference about the
 6 relationship, is it fair and accurate to say that he
 7 never once again mentioned Marilyn to you?
 8 A Yes.
 9 Q Is that what you're telling me?
 10 A Yes.
 11 Q You're thinking about that answer a couple --
 12 A Yes.
 13 Q All right.
 14 A I'm not saying it's just one day in January that we
 15 talked about. And walked out, I mean that's not a
 16 term that -- that was never expressed on walking
 17 out, I mean.
 18 Q Well, what exactly did he say?
 19 A I think I said where was Marilyn, and he didn't say
 20 she walked out.
 21 Q Just so the record is clear, what I've got here is
 22 that your previous statement under oath is that he
 23 responded when you said where's Marilyn, he
 24 responded she was upset about the job, did not know
 25 if she was coming back?

111

1 A Right.
 2 Q Is that accurate?
 3 A That's accurate.
 4 Q Okay, very good. What about Mr. Christofferson?
 5 After you learned from Mr. Norquist that
 6 Marilyn Figueroa had walked out, did
 7 Mr. Christofferson ever talk to you or touch the
 8 issue of Marilyn Figueroa?
 9 A Yes, we talked about it because I needed to know if
 10 she was coming back.
 11 Q Tell me when did you talk to him?
 12 A I don't recall it.
 13 Q Was it shortly after Mr. Norquist --
 14 A Yes, yes.
 15 Q -- reported to you that she left the job?
 16 A Yes.
 17 Q And what, if anything, did Mr. Christofferson
 18 respond?
 19 A He didn't know if she was coming back.
 20 Q He claimed that he did not know?
 21 A Right.
 22 Q Did he --
 23 A We're talking about the campaign here; right?
 24 Bill.
 25 Q I understand, I understand.

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1 A We're not talking about --
 2 Q I understand that you had nothing to do with her
 3 work duties as a City employee?
 4 A Right, right.
 5 Q We're only talking in the context of the campaign?
 6 A Right, right.
 7 Q Now, let me go back to your discussion with
 8 Mr. Christofferson.
 9 A Uh-huh.
 10 Q The very next time you discussed Marilyn would have
 11 been with Mr. Christofferson?
 12 A Right.
 13 Q Is that correct?
 14 A Right.
 15 Q And how did that discussion develop?
 16 A I needed to ask if Marilyn was coming back because
 17 of this event that was happening.
 18 Q And what did you ask him?
 19 A If she was coming back.
 20 Q And what was his response?
 21 A He said he didn't know at that point.
 22 Q Anything else?
 23 A No.
 24 Q Well, did he give you any information about she
 25 quit, she left, she's no longer with us, nothing?

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1 A No.
 2 Q Did you question him?
 3 A Not at that point, no.
 4 Q Did there come a time when you did?
 5 A No, I don't believe so. I mean it was clear she
 6 wasn't coming back to the campaign, right.
 7 Q Did you ever discuss Marilyn again with
 8 Christofferson?
 9 A No, I don't believe so.
 10 Q Did you ever question Mr. Soika or anybody else
 11 about whether or not Marilyn was returning?
 12 A I really don't talk to Mr. Soika.
 13 Q You stated before in a very kind fashion that you
 14 felt Marilyn was hard working, did a good job; true?
 15 A True, true.
 16 Q And all of a sudden somebody tells you in one, less
 17 than one sentence she's not coming back and you
 18 don't inquire any further?
 19 A But it was clear she was unhappy.
 20 Q Clear to you?
 21 A To me.
 22 Q On what basis?
 23 A Based on talking with her.
 24 Q Did you ever pinpoint specifically why she was
 25 unhappy before she left?

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1 A Again, I think it was the job. It was my
 2 understanding it was the job situation.
 3 Q Do you know what about the job situation that kept
 4 her unhappy?
 5 A Again, my understanding is that she was unhappy with
 6 Tricia Geraghty when she came in.
 7 Q Anything else? One thing you know is that she was
 8 unhappy, but you really don't know the entire extent
 9 of what kept Marilyn unhappy?
 10 A Right.
 11 Q Is that correct?
 12 A Correct.
 13 Q Do you -- after Marilyn left did there come a time
 14 when you learned that the City had terminated her
 15 employment? Did you learn that ever?
 16 A Yes.
 17 Q How did you learn that?
 18 A I believe from Ruth.
 19 Q What did she tell you?
 20 A That the City had terminated employment.
 21 Q When did she tell you this approximately?
 22 A I don't have any recollection of that.
 23 Q Did you ever -- was that before or after you learned
 24 that Marilyn had been hospitalized?
 25 A I don't know because I don't know when Marilyn -- I

115

1 don't have a recollection of when specifically
 2 Marilyn was --
 3 Q Was it around the same time?
 4 A I don't know.
 5 Q You learned at some point in January and/or
 6 February that she was hospitalized; correct?
 7 A Correct.
 8 Q And then at some point you learned from Ruth that
 9 the City had terminated her employment; true?
 10 A True.
 11 Q Where did Ruth tell you this information?
 12 A On the phone I'm sure.
 13 Q Tell me what you remember.
 14 A I don't.
 15 Q What did you say or react or respond to?
 16 A I didn't.
 17 Q Were there any questions in your mind?
 18 A No.
 19 Q Well, did Marilyn ever tell you she was going to
 20 quit specifically?
 21 A No.
 22 Q I realize you --
 23 A No, no.
 24 Q Did you discuss her termination with anybody else
 25 other than Ruth?

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1 A No.
 2 Q Did she tell you how she was terminated?
 3 A No.
 4 Q Are you still under a salary from the Norquist
 5 campaign?
 6 A Yes.
 7 Q What's your compensation? How do you get paid? I
 8 mean what kind of salary do you get?
 9 A You mean what do I make?
 10 Q Right.
 11 A \$60,000.
 12 Q Working for him?
 13 A Yes.
 14 Q That's not including what you make working for
 15 others?
 16 A Right.
 17 Q Is that correct? Are you also on a salary with
 18 respect to others that you're working for?
 19 A Yes. It changes.
 20 Q Is that right?
 21 A Yes.
 22 Q This relationship, is that a written contract that
 23 you have --
 24 A No.
 25 Q -- with the Mayor?

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1 A No.
 2 Q Just a verbal agreement?
 3 A Right.
 4 Q Is that correct? So you don't have any job
 5 description or specific responsibilities?
 6 A Right.
 7 Q You don't have any dollar amount that you have
 8 promised to produce?
 9 A No.
 10 Q Is that correct?
 11 A No.
 12 Q Are you working with Mr. Christofferson in any other
 13 political campaign?
 14 A Yes.
 15 Q How many?
 16 A Two.
 17 Q Which ones are they?
 18 A Doyle and Kevin Shibilski.
 19 Q How do you pronounce the last name, sorry?
 20 A S-H-I-L-I-B-I-L-S-K-I.
 21 Q What is this gentleman?
 22 A He's running for lieutenant governor.
 23 Q Now, am I in or am I out of the political circle?
 24 A You'd like him.
 25 Q All right.

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1 A He's a state senator from Stevens Point.
 2 Q No wonder I don't know him. All I do is fight with
 3 those guys in Stevens Point.
 4 Did you ever discuss anything related to the
 5 allegations made against John Norquist with
 6 Jeff Gillis?
 7 A No.
 8 Q Do you know who Jeff Gillis is?
 9 A Absolutely.
 10 Q Who is he?
 11 A I know we were going to add him to the list of who
 12 was in that initial list I gave you who advised the
 13 campaign.
 14 Q Michelle?
 15 A No, Bill, my husband, you know, kind of the -- yeah.
 16 Q Bill Gillis, who is he?
 17 A Jeff Gillis.
 18 Q Jeff Gillis?
 19 A Who is he now?
 20 Q Well, tell me, what does he do?
 21 A He's a consultant.
 22 Q Was he working on the Norquist campaign, re-election
 23 campaign in the year 2000?
 24 A He wasn't paid.
 25 Q But he was working?

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1 A Yes.
 2 Q Do you recall ever discussing anything related --
 3 A No.
 4 Q -- to the Norquist rumors with Marilyn?
 5 A No.
 6 Q Have you ever discussed with him this whole
 7 situation?
 8 A No.
 9 Q After Mr. Norquist came out?
 10 A No.
 11 Q Do you have any knowledge as to whether or not the
 12 Mayor knows that you're not happy about the whole
 13 situation? First of all, you are not happy about
 14 the whole situation?
 15 A Right.
 16 Q That's what you testified. Do you know if the Mayor
 17 has any knowledge about your unhappiness with his
 18 conduct?
 19 A I would -- no, I don't have any knowledge of that.
 20 Q Did you let Mr. Christofferson know that you were
 21 not happy with the whole situation?
 22 A Certainly.
 23 Q And what was his reaction when you made him --
 24 A Well not -- I don't think he was surprised.
 25 Q Why do you say that?

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1 A Well, I think that he knows this was not something
2 that made me very happy, you know, or my husband.
3 Q Did he try to calm you down or convince you not?
4 Did you ever threaten to quit --
5 A No.
6 Q -- the campaign? Did you think that this would blow
7 over?
8 A No.
9 Q Do you have an opinion as to whether or not when the
10 Mayor decided to come open, do you have an opinion
11 as to whether or not Kris Christofferson was the one
12 who recommended that he have a press conference and
13 disclose this as a consensual relationship?
14 A I don't know, I don't know.
15 Q If, assuming that this was a political move on the
16 part of Mr. Christofferson, did you believe that
17 that was the right thing to do?
18 A I've never asked anybody what the motivation was for
19 doing it.
20 Q That wasn't my question. My question is assuming
21 that that would be the case, do you think that that
22 was the right thing to do?
23 A I can't answer that. I don't --
24 Q You knew that he did this after Marilyn Figueroa had
25 filed her complaint with the EOC; correct?

121

1 A Right.
2 Q Do you believe, knowing the fact that she had filed
3 a complaint, do you believe that the Mayor's
4 intentions by coming out and labeling this as a
5 consensual relationship, do you believe that he was
6 genuine?
7 A I think so.
8 Q You think so? What leads you to say that? Did you
9 ever question the timing?
10 A No, I didn't. Partly because when Marilyn filed her
11 complaint, I was in Green Bay working on the state
12 senate race, so I didn't have a real awareness of
13 the complaint being filed.
14 Q All right. Well, let's take a chronology here.
15 A Okay.
16 Q To get a set of facts together.
17 A Okay.
18 Q Here comes an employee who files a serious complaint
19 and it was not until after that that the public
20 appearance is made. Did you suspect motives in any
21 way when you keep that chronology in mind?
22 A I assumed that he wanted to get it out before she
23 did.
24 Q Well, we already established that she had already
25 filed a complaint on October 11th.

122

1 A Right.
2 Q He didn't come out until December, correct? My
3 question to you, do you question the motive given
4 that chronology, the fact that she had already filed
5 a complaint and he waits until after that to come
6 out open? Did you ever question the motive at
7 all --
8 A No.
9 Q -- given the timing?
10 A Put it that way, no.
11 Q Inversely, did you ever wonder if he was genuine
12 about it why didn't he come out long before she
13 filed her complaint? Did you ever wonder that?
14 A Wonder, never asked about, yes.
15 Q So you did question the timing; true?
16 A I never understood the timing.
17 Q No, my question is but based on that, you did
18 question the timing?
19 A More or less, yes.
20 Q Were you ever involved in any way in working with
21 agencies and/or organizations that received block
22 grants from the City for purposes of obtaining
23 funds?
24 A I'm not real aware of who gets block grants, but I
25 do a lot of nonprofit work. So I can't say no or

123

1 yes.
2 Q Did the Mayor get any funding or receive any funds
3 from any Hispanic agencies before his re-election?
4 A Well, it couldn't be from agencies. You mean from
5 Hispanic individuals?
6 Q Right.
7 A Sure.
8 Q And would those individuals be on this list?
9 A Yes, yes.
10 Q Any specific individual that comes to mind that you
11 believe donated to John Norquist?
12 A Well, David Espinoza, LaCasa, Walter Sava at the
13 UCC. There were a lot of Hispanic donations.
14 Q What about Ortiz, Abel?
15 A Yes.
16 Q What about Lupe Martinez?
17 A Yes.
18 Q What about Maria Cameron?
19 A Yes, on and off.
20 Q What about Ernesto Chacon?
21 A Yes, at some point.
22 Q Any of the owners of restaurants?
23 A Yes.
24 Q Can you name a few?
25 A Pedrano's, LaFuentes, Azteca, the Villarreals, all

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1 of them. That kind of is what --
 2 Q Did Marilyn have any input in generating funds from
 3 any of these individuals?
 4 A Yes, yes.
 5 Q Have you started your political campaign now on
 6 behalf of Mr. Norquist? Is that an ongoing thing?
 7 A It's an ongoing thing.
 8 Q Have you received any funds for Mayor Norquist from
 9 any of these individuals?
 10 A No.
 11 Q Before the Mayor became open or at least with his
 12 version of this relationship, did you ever witness,
 13 observe the Mayor hug, embrace, kiss
 14 Marilyn Figueroa?
 15 A No.
 16 Q Do you know anyone anywhere that may have observed
 17 the Mayor doing any of those things that I just
 18 identified?
 19 A No.
 20 Q When he came out and stated that this was a
 21 consensual relationship, did you question his
 22 version that this was a consensual relationship?
 23 A No.
 24 Q Why not?
 25 A Just because of the way he is.

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1 Q Other than that, do you have any other evidence that
 2 would help you to support that?
 3 A No.
 4 Q And when you say no because that's the way he is,
 5 what exactly do you mean?
 6 A Just the way his personality is. He's just so
 7 nonassertive and non -- I mean --
 8 Q Let's talk about the way he is. One thing that you
 9 learned is that he was not very honest with you;
 10 true? I mean he lied to you about the relationship;
 11 true?
 12 A I never asked him about the relationship.
 13 Q No, but you felt that he was not honest --
 14 A Right.
 15 Q -- in not disclosing it; true?
 16 A Right.
 17 Q And another thing that you also learned about
 18 Mr. Christofferson is that he was not totally open
 19 with you --
 20 A Right.
 21 Q -- about the relationship; true?
 22 A Right.
 23 Q And you believe that one of the reasons is because
 24 they needed you?
 25 A Yes.

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1 Q And they were concerned that they would lose you --
 2 A Possibly.
 3 Q -- if you felt very strongly about this?
 4 A Yes, possibly.
 5 Q Did you ever feel used about the fact that they knew
 6 they withheld that because they needed you?
 7 A No. That's politics.
 8 Q But that's what they were doing, they were using
 9 you?
 10 A Right. That's politics.
 11 Q But you know they were using you; true?
 12 A More or less.
 13 Q You were willing to let them use you?
 14 A But I didn't know about it.
 15 Q Well, but you haven't taken any strict actions
 16 against either one?
 17 A No.
 18 Q You allowed them to use you over this period of
 19 time; true?
 20 A Well, I wouldn't frame it that way.
 21 Q How would you frame it? They needed you, as you
 22 stated on the record; correct?
 23 A Yes.
 24 Q They decided not to tell you, correct, because they
 25 felt they could lose you; true?

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1 A That's my interpretation.
 2 Q And they also knew that you were a positive and a
 3 good fund raiser?
 4 A Yes.
 5 Q So they used you; true?
 6 A I'm not willing to concede that.
 7 Q But factually that is what happened; true?
 8 A They didn't tell me, yes.
 9 Q Are you familiar with Eloisa Gomez?
 10 A Yes.
 11 Q How do you know Eloisa Gomez?
 12 A She worked for the Mayor.
 13 Q Do you know when she left the Mayor's office?
 14 A She left -- no, '92? I don't know.
 15 Q Do you know why she left her employment?
 16 A Not specifically.
 17 Q What do you know about why she left?
 18 A I don't know if she left or was asked to leave. I
 19 don't know that.
 20 Q Do you know if Eloisa Gomez entered into some type
 21 of agreement or settlement with the City of
 22 Milwaukee?
 23 A No, I don't know that.
 24 Q Do you know, based on what you know, was her
 25 conduct, her person questioned by anyone?

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1 A No.
 2 Q Do you know who asked her to leave?
 3 A No.
 4 Q Did she work under the Mayor's initiative? In other
 5 words, was she a subordinate of John Norquist?
 6 A Or the chief of staff.
 7 Q Is that correct? Obviously based on the way
 8 Mayor Norquist works, he would have approved her
 9 termination if she was terminated; correct?
 10 A Yes, yes.
 11 Q Did you ever discuss that with the Mayor?
 12 A Eloisa?
 13 Q Yes.
 14 A No.
 15 Q Have you ever seen Eloisa?
 16 A Oh, sure.
 17 Q Where does she work?
 18 A Where does she work? She worked -- I don't know
 19 where she works now. She was at UW-M the last time.
 20 Q Well, she works here in Milwaukee?
 21 A Yes.
 22 Q Have you seen her this year?
 23 A Yes. No, not since -- I saw her last fall.
 24 Q In the years that you worked with Marilyn Figueroa,
 25 were you ever asked to rate her performance?

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1 A No.
 2 Q Did you ever volunteer any opinion about how you
 3 view her performance?
 4 A No.
 5 Q You gave Marilyn what I consider high ratings as far
 6 as working with you in a professional setting; true?
 7 A Right.
 8 Q Did you ever share the same opinion with
 9 Mr. Christofferson or Mr. Norquist?
 10 A Yes.
 11 Q How many times?
 12 A But not about her City, not about her City. I don't
 13 have an opinion.
 14 Q I understand that.
 15 A Okay.
 16 Q And I said in the campaign setting.
 17 A Yes, yes.
 18 Q You also stated that Mr. Norquist always spoke very
 19 kindly of Marilyn Figueroa?
 20 A Yes.
 21 Q Tell me some of the remarks that he would make about
 22 Marilyn Figueroa.
 23 A That she was a great organizer. And that, you know,
 24 all her fund raising -- we always spoke about the
 25 stuff she was doing with me, and he was just very

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1 complimentary.
 2 Q Did he continue to be complimentary all the way --
 3 when was the last time that he made any positive
 4 remarks about Marilyn Figueroa?
 5 A When we talked about whether she would come to the
 6 campaign, he was positive about that.
 7 Q When was that?
 8 A I don't know. Sometime when we were putting the
 9 campaign together in the fall.
 10 Q Like early June, July?
 11 A September, October -- no, September, October.
 12 Q September, October?
 13 A I think so.
 14 Q That was the last time you remember him making
 15 comments? Okay, all right. Have you ever seen any
 16 records, letters, cards, notes coming from
 17 Marilyn Figueroa to John Norquist?
 18 A No.
 19 Q What about vice versa?
 20 A No.
 21 Q Do you have any records, any commendations, letters
 22 of support, thank you notes, sent on behalf of
 23 Marilyn Figueroa when she worked for you?
 24 A No.
 25 Q When she was working for you in any of the fund

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1 raiser activities, do you recall anyone ever
 2 complaining about her professionalism and/or
 3 conduct?
 4 A No.
 5 Q Do you have any evidence from any source of Marilyn
 6 being a promiscuous individual?
 7 A No.
 8 Q In December or January, did you notice any type of
 9 stress, that you could notice, observe, any anxiety
 10 on the part of John Norquist?
 11 A No. We're talking before the re-election?
 12 Q I'm talking about December of 1999, January of 2000.
 13 A No, uh-uh.
 14 Q Do you know whether or not -- strike that. Did you
 15 ever assert any denials to the press with respect to
 16 some of the rumors that were floating around before
 17 he was elected? And I'm talking about the rumors
 18 involving Ms. Figueroa.
 19 A Did I?
 20 Q Yes.
 21 A No.
 22 Q Do you know if Mr. Christofferson ever denied in
 23 public --
 24 A I wouldn't know that.
 25 Q -- these rumors?

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1 A I wouldn't know that.
 2 Q You've never seen any in any newspaper or any media?
 3 A No.
 4 Q Is that right?
 5 A I'm not aware of it.
 6 Q Did you ever learn before Marilyn left her City
 7 employment, did you ever know whether or not Marilyn
 8 and John Norquist traveled outside City limits from
 9 time to time?
 10 A No, no.
 11 Q Did he ever discuss that with you?
 12 A No.
 13 Q Did you ever hear any other rumors involving any
 14 other employee --
 15 A No.
 16 Q -- and John Norquist? Did you ever keep a calendar
 17 during the period that you were working on the
 18 re-election campaign?
 19 A I don't keep calendars.
 20 Q What about appointment books?
 21 A No.
 22 Q How do you remember when you have to meet people?
 23 A I remember.
 24 Q You never kept a calendar in your life?
 25 A Never in my life, no.

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1 Q Any type of record in your computer?
 2 A No, no. No palm pilot, nothing.
 3 Q Are you familiar with Maria Cameron?
 4 A Yes.
 5 Q Do you know her well?
 6 A Not well.
 7 Q Has she ever -- have you and Maria ever discussed
 8 Marilyn Figueroa?
 9 A No.
 10 Q John Norquist or the allegations concerning
 11 John Norquist?
 12 A No.
 13 Q What about Abel Ortiz?
 14 A No.
 15 Q Did any of these individuals ever raise questions
 16 regarding this matter with you?
 17 A No.
 18 Q Let's talk about Chief Jones.
 19 A Okay.
 20 Q Do you ever socialize --
 21 A No.
 22 Q -- or were in any way involved with doing activities
 23 with Chief Jones?
 24 A No.
 25 Q Do you recall whether or not Chief Jones before he

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1 became the chief of police was the driver for
 2 Mayor Norquist?
 3 A Yes, he was.
 4 Q Do you know for how long?
 5 A No, I don't.
 6 Q Do you know who else during the years that you've
 7 been associated with the Mayor, do you know who else
 8 has been assigned to be the driver for
 9 Mayor Norquist?
 10 A Yes. But I don't remember all their names. Linda.
 11 Q Linda?
 12 A Linda.
 13 Q Linda Valesco?
 14 A Valesco. Bob Connelly, R. C., Dexter.
 15 Q Dexter?
 16 A Uh-huh.
 17 Q Out of all these individuals, do you know which one
 18 served the longest?
 19 A No. Linda perhaps.
 20 Q Linda Valesco?
 21 A Uh-huh.
 22 Q To your knowledge, -- do you know Linda well?
 23 A No.
 24 Q Do you know who she is?
 25 A Absolutely.

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1 Q Do you know if she's still working for the City of
 2 Milwaukee?
 3 A I don't know. I don't think so, but I don't know
 4 for sure.
 5 Q Do you know who was the last person in the year 2000
 6 driving for the Mayor?
 7 A No.
 8 Q To your knowledge, is he assigned a body guard,
 9 security person other than the drivers?
 10 A No.
 11 Q Or is that the security person?
 12 A That's the security person.
 13 Q Since Marilyn left the City on January 4th of 2000,
 14 have you had any communication with Attorney
 15 Anne Shindell?
 16 A No.
 17 Q Have you ever been at any meetings where
 18 Anne Shindell --
 19 A No.
 20 Q -- has spoken?
 21 A No.
 22 Q Have you ever met with Attorney Lester Pines?
 23 A No.
 24 Q Received any information, letters, interrogatories,
 25 subpoenas, anything?

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1 A No.
 2 MR. FINERTY: Pines?
 3 MR. ARELLANO: P-I-N-E-S.
 4 Q Before coming to this deposition did you review any
 5 records and/or documents?
 6 A Like?
 7 Q Any type of records related to these proceedings.
 8 A No. I mean I brought what --
 9 MR. ARELLANO: Why don't we take a
 10 second and show me what you have produced
 11 today, counsel.
 12 MR. FINERTY: Sure.
 13 (Discussion off the record)
 14 Q Have you ever met with any of the City attorneys
 15 related to the Marilyn Figueroa-John Norquist
 16 proceedings?
 17 A No.
 18 Q You have known for quite some time that your
 19 deposition was being scheduled?
 20 A Right.
 21 Q Is that correct? Did you ever consult with
 22 Mr. Norquist?
 23 A No, no.
 24 Q Have you at any time during this year after Marilyn
 25 was terminated from her employment discuss
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1 Marilyn Figueroa with Norquist?
 2 A No.
 3 Q You have stated I think on two occasions that you
 4 believe John Norquist's version that he had a
 5 consensual relationship with Marilyn Figueroa;
 6 right?
 7 A Yes.
 8 Q But you are not able to tell me on what basis you
 9 have come to that conclusion?
 10 A Right.
 11 Q Marilyn Figueroa claims that she was sexually
 12 harassed, coerced, used during her employment by
 13 John Norquist. Do you have any basis for not
 14 believing Marilyn Figueroa?
 15 A No.
 16 Q Have you kept any copies of newspapers related to
 17 the Marilyn Figueroa-John Norquist matters?
 18 A No.
 19 Q Is it fair and accurate to say that if there were
 20 any meetings to strategize how to deal with
 21 Marilyn Figueroa, you have not participated in any?
 22 A That's correct.
 23 Q Is that your sworn testimony today?
 24 A Yes.
 25 Q Do you know anyone anywhere in this world to whom
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1 John Norquist had confided and/or admitted having
 2 had a sexual relationship with Marilyn Figueroa
 3 before he became public?
 4 A No.
 5 Q Do you know John Norquist's close or personal
 6 friends, if he has any?
 7 A Yes.
 8 Q Who are they?
 9 A I'd say Tom and Roxanne Crawford are his closest
 10 friends.
 11 MR. FINERTY: Who?
 12 THE WITNESS: Tom and
 13 Roxanne Crawford.
 14 Q Crawford? Anyone else?
 15 A No.
 16 Q By your reaction to the news that he exposed, I
 17 sense that you also felt to be a close friend of
 18 John Norquist? You and your husband to be more
 19 precise.
 20 A I don't think you're friends with John.
 21 Q Well, given whatever --
 22 A Right.
 23 Q -- boundaries he would allow you to approach him,
 24 with those limitations in mind, and I'm talking
 25 about the fact that what you're telling me is that
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1 he kind of keeps people at a distance; is that what
 2 you're telling me?
 3 A Yes.
 4 Q Given that structure of his personality, did you
 5 consider, you and your husband consider yourselves
 6 close friends of John Norquist, with that caveat?
 7 A I think we're friends with him. Not how we would
 8 define other friendships.
 9 Q Let's talk about did you spend any Christmas with
 10 Norquist?
 11 A No.
 12 Q Birthday parties?
 13 A His 50th birthday party.
 14 Q What about -- you did state that from time to time
 15 you would go out?
 16 A Yes.
 17 Q Well, how would you describe your relationship with
 18 Norquist; just business relationship or both?
 19 A Both.
 20 Q Other than Tom and Roxanne Crawford, do you know any
 21 other people that are close to Norquist?
 22 A No.
 23 Q Are these folks in the City of Milwaukee?
 24 A Yes.
 25 Q Are you close to the Crawfords?
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1 A No.
 2 Q Do you know them? Do you know them?
 3 A I've met Mrs. Crawford once and him once at John's
 4 birthday party.
 5 Q Do you know how they know each other?
 6 A He was in the legislature.
 7 Q Tom Crawford?
 8 A Yes.
 9 Q Okay.
 10 A He works at the sewage district now.
 11 Q How long has Ruth worked for John Norquist?
 12 A I can't tell you specifically. I'd say 20 years.
 13 Q Do you know if Ruth, is she married?
 14 A Yes.
 15 Q Do you know if Ruth and her husband are close to
 16 Norquist?
 17 A They're not.
 18 Q Why did you make such a firm statement?
 19 A Because they don't spend any social time together.
 20 Q Is it fair and accurate to say, based on what you
 21 know, that Ruth is the person that conducts most of
 22 the scheduling and planning for John Norquist in his
 23 office?
 24 A She oversees it, yes.
 25 Q Do you know if anyone within the political campaign

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1 organization serves as, in the same capacity as Ruth
 2 serves for while he works for the City?
 3 A She did both.
 4 Q She also handles the political aspect of it?
 5 A Yes.
 6 Q And you say 20 years?
 7 A Yes.
 8 Q If Mr. Christofferson knew about this relationship
 9 and he also knew that you were denying that this
 10 relationship existed, he would then be lying to you,
 11 correct, by not telling you; true?
 12 A Well, lying's a strong word.
 13 Q Well, that wouldn't be very honest to do?
 14 A That would be correct.
 15 Q Similarly, if he knew of the relationship and he
 16 told the press or anyone that it was not true, that
 17 would also be a lie; true?
 18 A Technically.
 19 Q And any other manner would also be a lie, factually;
 20 correct?
 21 A I guess.
 22 Q Do you know if Mr. Christofferson ever lied to the
 23 press?
 24 A I don't know.
 25 Q That would concern you, wouldn't it?

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1 A Somewhat.
 2 Q It wouldn't be a serious matter to you?
 3 A It would be a serious matter. I mean there's a
 4 difference between spinning the press and flat out
 5 lying.
 6 Q Well, spinning, if you and I understand that, is
 7 manipulating --
 8 A Right.
 9 Q -- certain facts; correct?
 10 A Yes.
 11 Q And the person that was responsible for spinning
 12 things within the political campaign group would be
 13 Mr. Christofferson; true?
 14 A True.
 15 Q You don't believe that just because this is a
 16 political organization, it would be justifying lying
 17 to the press and to the public?
 18 A No.
 19 Q That's not the way you operate, do you?
 20 A No.
 21 MR. ARELLANO: Let's go off the
 22 record for a minute.
 23 (Discussion off the record)
 24 Q Let me show you, Ms. Candy, a record which has been
 25 marked as Exhibit No. 1, and let me ask you to tell

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1 me whether or not that is a notice of taking of your
 2 deposition and a subpoena duces tecum?
 3 A Yes.
 4 Q And did you receive that document?
 5 A Yes.
 6 Q Were you served with that document?
 7 A Yes.
 8 Q And this document would you agree with me, would you
 9 not, that it contains a total of 16 pages; is that
 10 correct?
 11 A Yes.
 12 Q And many of the questions request records and other
 13 questions request information; is that correct?
 14 A Right.
 15 Q And you have produced a box of records; is that
 16 correct?
 17 A Right, right.
 18 Q And I have put on the record that I will have, I
 19 will need some time to review those records, and I
 20 notice that they are quite a few records that you
 21 have produced today. And then tomorrow I don't
 22 expect to spend more than two hours with you to
 23 complete your deposition, and hopefully I don't have
 24 to call you back until the day of trial.
 25 A Okay.

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1 Q Is that okay?

2 A Yes.

3 MR. ARELLANO: Is that acceptable
4 to counsel?

5 (Discussion off the record)

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9 (Adjourning at 3:35 p.m.)
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1 STATE OF WISCONSIN)
2 COUNTY OF DANE) ss.

3 I, TAUNIA NORTHOUSE, a Registered Diplomate Reporter
4 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
8 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
14 interest and thereafter converted to typewriting using
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 cause.

23 Dated February 3, 2003.
24
25

Registered Diplomate Reporter
Notary Public, State of Wisconsin
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