PAGES STATE OF WISCONSIN
DEPARTMENT OF WORKFORCE DEVELOPMENT 198 2 1 Ms. Candy's telephone numbers EQUAL RIGHTS DIVISION MILWAUKEE COUNTY 199 3 Emails re Norquiest-Figueroa matter 4 Ms. Candy's Internet service provider 199 Emails to and from Mr. Christofferson 5 MARILYN FIGUEROA, Names of individuals who questioned 6 Complainant, Ms. Candy about the Norquist-Figueroa relationship ERD Case No. 7 CR200003454 8 CITY OF MILWAUKEE. 9 Respondent. 10 11 (Original transcript filed with Attorney Arellano) 12 Videotape Deposition of: 13 BARBARA R. CANDY 14 Volume II 15 Milwaukee, Wisconsin 16 February 1, 2002 18 Reporter: Taunia Northouse, RDR, CRR 19 20 21 22 23 24 25 149 1 VOLUME II of VIDEOTAPE DEPOSITION of INDEX 2 BARBARA R. CANDY, called as a witness, taken at the WITNESS Page(s) BARBARA R. CANDY 3 instance of the Complainant, under the provisions of 3 Examination by Mr. Arellano 151 4 Chapter 885 of the Wisconsin Statutes, pursuant to 5 Examination by Mr. Schrimpf 246 5 notice and subpoena duces tecum, before 6 Taunia Northouse, a Registered Diplomate Reporter 6 EXHIBITS and Notary Public in and for the State of Wisconsin. Identified <u>No</u> . Description 8 8 at the offices of Murphy, Gillick, Wicht & 3 List of attendees at fund raiser 160 9 9 Prachthauser, Attorneys at Law, 330 East Kilbourn Citizens for Norquist -- Mayor's Club 163 10 10 Avenue, City of Milwaukee, County of Milwaukee, and List of restaurant donors 11 11 State of Wisconsin, on the 1st day of February 2002, List of attendees at fund raiser commencing at 9:30 in the forenoon. 12 12 List of donors 181 13 13 List of donors 181 14 14 APPEARANCES 9 182 List of donors 15 15 VICTOR M. ARELLANO, Attorney, for LAHTON & CATES, S.C., Attorneys at Law, 10 East Doty Street, Madison, Wisconsin, appearing on behalf of the Complainant. 10 List of donors 182 16 16 11 List of donors 183 17 17 12 List of donors 188 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 18 18 13 List of donors 19 19 List of donors 190 20 20 of the Respondent. 191 Real Estate Forum Attendees 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. 16 Women's Event Sponsors 193 22 22 16-A List of donors 195 23 23 Marilyn Figueroa and Cheri Garcia Emily Aurit, videographer Also present: 24 24 25 (Original exhibits returned by the reporter to Attorney Finerty: copies attached to the original transcript and provided to counsel)
148 25 150

	100	Compless Deposition of DANDANA	Λ. C	<u> </u>	ADT (VOL. II) ZITIOZ	Sheet 2
1		BARBARA R. CANDY,	1	Α	The summer of '87.	
2		called as a witness, being first duly sworn,	2	Q	Was that the first time that Mr. Norquist ran fo	or
3		testified on oath as follows:	3		Mayor position?	
4			4	Α	Yes.	4
5		EXAMINATION	5	Q	When was he elected for the first time?	
6	В	y Mr. Arellano:	6	Α	April of '88.	
7	Q	Ms. Candy, this is the continuation of your	7	Q	And so is it fair and accurate to say based on t	:he
8		deposition which began yesterday and, as you	8		testimony that you have provided here yestere	lay and
9		understand, you are still under oath and we will be	9		today that you have worked for Mayor Norqu	ist
10		on the record. And the same instructions pretty	10		consecutively from 1986 to the present?	
11		much apply. If you don't understand my question or	11	Α	1987 to the present.	
12		have difficulties understanding the context of my	12	Q	1987 to the present?	
13		question, please let me know. And if you need a	13	Α	Yes.	
14		break or anything at some point, just let me know.	14	Q	You have not skipped any year or taken any ty	pe of
15		Is that okay?	15		leave	
16	Α	Yes.	16	Α	No, no.	
17	Q	And finally, remember to just simply answer your	17	Q	for any reason? And as I understand right r	iow,
18		questions in the affirmative and/or negative or in	18		his political campaign is active and ongoing?	
19		some fashion so that the record's clear.	19	Α	Yes.	
20		All right. Let's start by addressing	20	Q	Is that correct?	
21		documents that you have produced as I understand	21	Α	Yes.	
22		pursuant to my subpoena; is that correct?	22	Q	I assume you read the newspaper this morning	g?
23	Α	Yes.	23	Α	Yes.	
24	Q	And you produced files which in general terms	24	Q	And I just wanted to make sure that you have	an
25		speaking cover several years of work that you have	25		opportunity to clarify. I read in the newspape	r,
		151	:		153	
<u> </u>			 			
1		performed for Mayor Norquist; is that correct?	1		and I don't have a copy of the article, that you	r
2	_	Yes.	2		salary was \$19,000. I think it was quoted in th	e
3	Q	Why don't you tell me in general terms what you have	3		newspaper that you get paid \$19,000?	
4	^	produced.	4	Α	I think they took a six-month period after taxe	
5	^	I've produced the fund raisers we did over several	5	_	which is what's reported on the Mayor's repor	
6		years, the sign-in sheets, the invitations for	6	Q	So that would not be inaccurate with your test	imony
8	0	various events.	7	۸	from yesterday?	
9	Ų	And based on my review of some of the records you	8		No, no.	
10		produced we're covering a number of years; is that correct?	10		Which is that you get \$60,000 a year?	
11	Δ	Yes.	11	_	60,000, yes.	
12		Can you tell me what years you believe we are	12	_	Is that gross or net or before taxes? That's before taxes.	
13	~	covering through those documents that you produced	13	_	Before taxes, okay.	
14		today?	14		And then the treasurer takes the taxes out.	
15	Α	Predominantly '98, '99, 2000.	15	_	And who does your taxes for you?	
16	_	I saw some records that go as far back as 1993?	16		My family taxes?	
17		'93. On the events we do every year which are the	17		Yes.	
18		big folders, they go back to when we started the	18		Bill Appel.	
19		event.	19	_	ls he an accountant here in Milwaukee?	
20	0	And just so we can update the record and place your	20	. `	Yes, yes.	
21	~	testimony in proper context chronologically	21	_	The last name spells L-A-P?	
22		speaking, you began to work for Mayor Norquist what	22		A-P-P-E-L.	
23		year?	23		And he has been your tax preparer for how los	n <i>o</i> ? - 4
24	Α	1987.	24		I don't know.	.6,
25		1987?	25		Years?	
	•	152		•	154	
		•				

	Ous	,	Compress Deposition of BANDANA			
l	1		Yes.	1		list of sign-in names, are you able to tell me where
	2	Q	So he would have all your records; is that correct?	2		this event took place?
-	3	Α	Yes.	3	Α	No, I don't recall. We move it every year, and I
	4	Q	The records that you produced as I see them contain,	4		don't recall where it was in 1998.
1	5	•	among other things, lots of lists of names?	5	Q	When you say we move it every year, are we talking
	6	Α	Yes.	6		about one major event that takes place every year?
ı	7	Q	Is that correct?	7		In a different place.
١	8	Α	Yes.	8	Q	And what usually takes place at that particular
	9	Q	And I just wanted to kind of go over a few lists to	9		major event that you're referring to?
ŀ	10		identify some of them. I'm showing you a package of	10	Α	As I said, 20 to 30 restaurants come in, set up and
	11		a restaurant event, and according to these	11		cook their specialty. We usually do it at a newly
١	12		documents, for March 10th, 1997.	12		developed building. This year it will be at the
	13	Α	Uh-huh.	13		Marshall Field's newly renovated building, and then
	14	Q	Is that correct?	14		people pay and come and eat.
1	15	Α	Yes.	15	Q	Where would I find the list of restaurants that
	16	Q	Can you tell me who or how you gather all these	16		participate in these events?
	17		names that appear in those documents?	17		It changes every year.
		Α	This particular?	18	•	The one for 1998?
		-	Correct.	19		I don't know.
			They sign in when they come.	20	Q	To your recollection, and based on the practice of
			When they come?	21		the Mayor with respect to some of these events, do
			They arrive at the event.	22		you have any information as to whether or not the
		-	Did you participate in that event?	23		Mayor's staff appeared at this particular event in
			Yes.	24		1998?
- 1	25	Q	What restaurant was that?	25	Α	I wouldn't know specifically, but generally they do.
			155			157
) [1	Α	I I don't know. It's an event where we have 20	1	Q	In this particular event of 1998 do you recall
	2		to 30 restaurants prepare food.	2		seeing Marilyn Figueroa there?
-	3	Q	Do you recall whether or not Marilyn Figueroa	3	Α	No, no. There generally are 400 to 500 people
-	4		attended that event?	4		there. There are a lot of people.
- [5					
		Α	No.	5	Q	Correct me if my assumption is incorrect how do
	6	Q	You don't recall or	5 6	Q	Correct me if my assumption is incorrect how do you like that sentence, correct me if I'm
	6 7	Q A	You don't recall or I don't recall.	5 6 7	Q	Correct me if my assumption is incorrect how do you like that sentence, correct me if I'm incorrect is it fair and accurate to say, so I
	6 7 8	Q A Q	You don't recall or I don't recall. or you know she didn't?	5 6	Q	Correct me if my assumption is incorrect how do you like that sentence, correct me if I'm incorrect is it fair and accurate to say, so I can avoid putting you through a lot of this pain of
	6 7 8 9	Q A Q A	You don't recall or I don't recall or you know she didn't? I don't recall.	5 6 7 8 9	Q	Correct me if my assumption is incorrect how do you like that sentence, correct me if I'm incorrect is it fair and accurate to say, so I can avoid putting you through a lot of this pain of asking you questions that you may not remember, is
	6 7 8 9	Q A Q A	You don't recall or I don't recall or you know she didn't? I don't recall. Okay, very good. And to avoid you some pain, these	5 6 7 8 9 10	Q	Correct me if my assumption is incorrect how do you like that sentence, correct me if I'm incorrect is it fair and accurate to say, so I can avoid putting you through a lot of this pain of asking you questions that you may not remember, is it fair and accurate to say that the only time that
	6 7 8 9 10	Q A Q A Q	You don't recall or I don't recall or you know she didn't? I don't recall. Okay, very good. And to avoid you some pain, these obviously are not names that you wrote?	5 6 7 8 9 10 11	Q	Correct me if my assumption is incorrect how do you like that sentence, correct me if I'm incorrect is it fair and accurate to say, so I can avoid putting you through a lot of this pain of asking you questions that you may not remember, is it fair and accurate to say that the only time that you really had contact with Marilyn Figueroa was
	6 7 8 9 10 11	QAQAQ A	You don't recall or I don't recall or you know she didn't? I don't recall. Okay, very good. And to avoid you some pain, these obviously are not names that you wrote? No.	5 6 7 8 9 10 11	Q	Correct me if my assumption is incorrect how do you like that sentence, correct me if I'm incorrect is it fair and accurate to say, so I can avoid putting you through a lot of this pain of asking you questions that you may not remember, is it fair and accurate to say that the only time that you really had contact with Marilyn Figueroa was when she was assigned to conduct a fund raiser in
	6 7 8 9 10 11 12	Q A Q A Q $A Q$	You don't recall or I don't recall or you know she didn't? I don't recall. Okay, very good. And to avoid you some pain, these obviously are not names that you wrote? No. These are names that the specific individual writes?	5 6 7 8 9 10 11 12	Q	Correct me if my assumption is incorrect how do you like that sentence, correct me if I'm incorrect is it fair and accurate to say, so I can avoid putting you through a lot of this pain of asking you questions that you may not remember, is it fair and accurate to say that the only time that you really had contact with Marilyn Figueroa was when she was assigned to conduct a fund raiser in the Hispanic community or in the minority
	6 7 8 9 10 11 12 13	QAQAQ AQA	You don't recall or I don't recall or you know she didn't? I don't recall. Okay, very good. And to avoid you some pain, these obviously are not names that you wrote? No. These are names that the specific individual writes? Right.	5 6 7 8 9 10 11 12 13		Correct me if my assumption is incorrect how do you like that sentence, correct me if I'm incorrect is it fair and accurate to say, so I can avoid putting you through a lot of this pain of asking you questions that you may not remember, is it fair and accurate to say that the only time that you really had contact with Marilyn Figueroa was when she was assigned to conduct a fund raiser in the Hispanic community or in the minority communities?
	6 7 8 9 10 11 12 13 14	QAQAQ AQAQ	You don't recall or I don't recall or you know she didn't? I don't recall. Okay, very good. And to avoid you some pain, these obviously are not names that you wrote? No. These are names that the specific individual writes? Right. The attendee?	5 6 7 8 9 10 11 12 13 14	Α	Correct me if my assumption is incorrect how do you like that sentence, correct me if I'm incorrect is it fair and accurate to say, so I can avoid putting you through a lot of this pain of asking you questions that you may not remember, is it fair and accurate to say that the only time that you really had contact with Marilyn Figueroa was when she was assigned to conduct a fund raiser in the Hispanic community or in the minority communities? No.
	6 7 8 9 10 11 12 13 14 15	QAQAQ AQAQA	You don't recall or I don't recall or you know she didn't? I don't recall. Okay, very good. And to avoid you some pain, these obviously are not names that you wrote? No. These are names that the specific individual writes? Right. The attendee? Right.	5 6 7 8 9 10 11 12 13 14 15 16	Α	Correct me if my assumption is incorrect how do you like that sentence, correct me if I'm incorrect is it fair and accurate to say, so I can avoid putting you through a lot of this pain of asking you questions that you may not remember, is it fair and accurate to say that the only time that you really had contact with Marilyn Figueroa was when she was assigned to conduct a fund raiser in the Hispanic community or in the minority communities? No. If that is your answer, other than the three events
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	6 7 8 9 10 11 12 13 14 15 16 17 18 20	QAQAQ AQAQA	You don't recall or I don't recall or you know she didn't? I don't recall. Okay, very good. And to avoid you some pain, these obviously are not names that you wrote? No. These are names that the specific individual writes? Right. The attendee? Right. Is that correct? Okay. I will place this back in your box. I will not mark this batch. Then you produced another set of records which I am unable to identify by year, so I'm going to	5 6 7 8 9 10 11 12 13 14 15 16 17 18 19 20	A Q	Correct me if my assumption is incorrect how do you like that sentence, correct me if I'm incorrect is it fair and accurate to say, so I can avoid putting you through a lot of this pain of asking you questions that you may not remember, is it fair and accurate to say that the only time that you really had contact with Marilyn Figueroa was when she was assigned to conduct a fund raiser in the Hispanic community or in the minority communities? No. If that is your answer, other than the three events that you described yesterday involving the Hispanic community, black community and the Native American community, what other events specifically do you recall Marilyn was assigned to conduct?
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	6 7 8 9 10 11 12 13 14 15 16 17 18 19 20 21 22 23	QAQAQ AQAQAQ A	You don't recall or I don't recall or you know she didn't? I don't recall. Okay, very good. And to avoid you some pain, these obviously are not names that you wrote? No. These are names that the specific individual writes? Right. The attendee? Right. Is that correct? Okay. I will place this back in your box. I will not mark this batch. Then you produced another set of records which I am unable to identify by year, so I'm going to provide them to you and ask you to look at those records to see if you can recall what year those records belong to or pertain to.	5 6 7 8 9 10 11 12 13 14 15 16 17 18 19 20 21 22 23	A Q	Correct me if my assumption is incorrect how do you like that sentence, correct me if I'm incorrect is it fair and accurate to say, so I can avoid putting you through a lot of this pain of asking you questions that you may not remember, is it fair and accurate to say that the only time that you really had contact with Marilyn Figueroa was when she was assigned to conduct a fund raiser in the Hispanic community or in the minority communities? No. If that is your answer, other than the three events that you described yesterday involving the Hispanic community, black community and the Native American community, what other events specifically do you recall Marilyn was assigned to conduct? I thought you asked me if I had contact with Marilyn other than at these events. I saw her frequently in the Mayor's office. Are you asking about working on

1	Ç	So the only events you remember she organized or was	1	Α	The restaurant event?
2		a factor were the ones that you mentioned yesterday;	2	Q	Yes.
3		correct?	3	Α	This is a restaurant event. It's the food thing.
4	Α	Right.	4		If you give your \$250, you get to come to that.
5		Otherwise you saw her attending some other events as	5	Q	And those records that you produced today or
6	•	well, is that true?	6	`	yesterday and today belong to the year of 19 what
7	Α	Uh-huh. And it was not a Native American. It was	7		year is that?
8		an Indian Indian.	8	Α	198.
9	О	Oh, from	9		1998. And then yesterday we marked a set of
10	_	From Asia, yes, yes.	10	•	documents as Exhibit No. 2 which also contains
11		What do I know? All right. Given that you have	11		Citizens for Norquist Mayor's Club. Do you have the
12	•	been involved in these political campaigns for so	12		ones for 1999 and 2000?
13		many years, would it be very unfair for me to assume	13	Α	This is an ongoing thing.
14		that you know all the people that signed these	14		But I notice that Exhibit No. 1 contains a list of
15	Α	Yes.	15	•	the Mayor's Club for the year 2002. I suspect you
16		these lists? You don't know them all?	16		have the ones for 2001, the year 2000?
17	-	No.	17	Α	They're all it's all ongoing.
18		Is that right?	18		It's an ongoing chronologically?
19		No.	19	-	It's an ongoing.
20		I have to clarify something, okay? I'm not sure	20		MR. SCHRIMPF: Pardon me, counsel.
21	`	that I I don't know if I removed some names from	21		You just said Exhibit No. 1. Exhibit No. 1 is
22		your folders. I noticed that some of your folders	22		a copy of the subpoena.
23		have a year. But by just looking at the documents	23		MR. ARELLANO: No, I said
24		themselves, are you able to tell me what year these	24		Exhibit No. 2.
25		events occurred?	25		MR. SCHRIMPF: Oh, 2? Okay.
		159			161
l .		•	1		
1	٨	No no	1		Tall me the appead we that is used in a day to
1		No, no.	1	Q	Tell me the procedure that is used in order to
2	Q	So you're basically being guided by these folders?	2	Q	contact someone who wants to be part of the Mayor's
2	Q	So you're basically being guided by these folders? Yes.	2	Q	contact someone who wants to be part of the Mayor's Club. Just give me the steps that you follow. How
2 3 4	Q	So you're basically being guided by these folders? Yes. MR. FINERTY: Make sure he gets an	2 3 4	Q	contact someone who wants to be part of the Mayor's Club. Just give me the steps that you follow. How do you go about recruiting somebody for the Mayor's
2 3 4 5	Q	So you're basically being guided by these folders? Yes. MR. FINERTY: Make sure he gets an invitation this year.	2 3 4 5		contact someone who wants to be part of the Mayor's Club. Just give me the steps that you follow. How do you go about recruiting somebody for the Mayor's Club?
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1	Q	And I want you to look at let me mark this 1998	1		Ever?
2		list of members.	2		No.
3		(Exhibit No. 4 marked for	3	Q	Is there a reason why if this came up time and time
4		identification)	4		again almost on the eve of election well, strike
5	Q	Yesterday you mentioned a list of individuals who	5		that. Did you think that these inquiries and rumors
6		you described as being some of the highest	6		were significant or had any did you give them any
7		contributors to John Norquist; do you recall that?	7		significance?
8	Α	Yes.	8	Α	No.
9	0	Are those individuals also members of the Mayor's	9	Q	And why is that?
10	`	Club?	10	Α	Because of the way John is.
11	Α	Yes.	11		And you keep saying that, and I'm having
12		Is that correct?	12	`	difficulties understanding that answer. Are you
13	-	Yes.	13		saying that it's not unusual for him to be having
14		The individuals that you cited yesterday, do you	14		extramarital affairs?
15	~	recall as you sit here today, do you recall which or	15	Α	I'm saying that his personality is such that I
16		who, if anyone, ever questioned you on the rumors	16	• •	didn't believe he would have extramarital affairs.
17		that were circulating in early year 2000, late 1999	17	0	But nevertheless, the rumor kept popping up?
18		about Mayor Norquist and Marilyn Figueroa?	18	-	Right.
19	Δ	You're going to have to ask me that again.	19		Correct?
20		Yes. You gave me a number of individuals yesterday	20	•	Right.
21	V	that you believe were the biggest contributors?	21		And you're telling me here, if I understand
22	Δ	Yes. I believe I said John and Dan Katz.	22	-	Right.
23		Did any of those individuals ever question you	23		that it never concerned you?
24		No, no.	24		I never believed it.
25		about the rumors?	25		That wasn't my question. My question is did that
120	V	163	20	V	165
		100			100
			 		
1	Α	No.	1		ever concern you, the fact that you were getting
2		No. You mentioned yesterday that these rumors came to	2		dozens of inquiries about these rumors regarding
1			1		
2	Q	You mentioned yesterday that these rumors came to	2	. A	dozens of inquiries about these rumors regarding
2	Q A	You mentioned yesterday that these rumors came to your attention via contributors	2	. A	dozens of inquiries about these rumors regarding Ms. Figueroa and Mr. Norquist?
2 3 4	Q A	You mentioned yesterday that these rumors came to your attention via contributors Uh-huh.	2 3 4 5 6		dozens of inquiries about these rumors regarding Ms. Figueroa and Mr. Norquist? Concern me how? Did it concern me that it made it
2 3 4 5	Q A Q	You mentioned yesterday that these rumors came to your attention via contributors Uh-huh from time to time and that they went on for a	2 3 4 5		dozens of inquiries about these rumors regarding Ms. Figueroa and Mr. Norquist? Concern me how? Did it concern me that it made it more difficult to raise money? A little bit, yes.
2 3 4 5 6	Q A Q A	You mentioned yesterday that these rumors came to your attention via contributors Uh-huh from time to time and that they went on for a long period of time?	2 3 4 5 6		dozens of inquiries about these rumors regarding Ms. Figueroa and Mr. Norquist? Concern me how? Did it concern me that it made it more difficult to raise money? A little bit, yes. All right. It seems to me using common sense, as
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1	Q And is it your sworn testimony that you have never	1	why you believed the Mayor?
2	expressed an outrage because the Mayor denied to you	2	A Certainly.
3	before he came out publicly	3	Q What did you say?
4	MR. SCHRIMPF: I'm going to object.	4	A I said I couldn't imagine that he would do this.
5	MR. ARELLANO: Well, you can't	5	Q When you told Marge Beil that you believed the
6	object until I finish my question.	6	Mayor, what did you do to come to the conclusion
7	MR. SCHRIMPF: All right. But I'm	7	that the Mayor was to be believed about these
8	going to object to the question.	8	particular allegations? Now hold on a second.
9	MR. FINERTY: Wait till he finishes	9	MR. ARELLANO: I want you to read
10	the question. Then let him state the	10	that question back. I want you to pay
11	objection. Don't interrupt while they fight	11	attention and take your time in answering the
12	about it.	12	question.
13	Q We were talking yesterday about Marge Beil; correct?	13	(Question read)
14	A Yes.	14	A Read it one more time, okay?
15	Q And you admitted under oath that you did talk to her	15	MR. SCHRIMPF: I'm sorry, I did not
16	about John Norquist and Marilyn Figueroa's rumors	16	hear that.
17	A Yes.	17	(Question read again)
18	Q before Mr. Norquist became public with his	18	A I'm not sure.
19	version of the relationship; correct?	19	MR. SCHRIMPF: I'm going to object
20	A Correct.	20	to the question because I believe it has been
21	Q You also admitted having spoken to Ms. Beil after he	21	asked and answered any number of times, and
22	became public	22	this really amounts to badgering of the
23	A Correct.	23	witness. Subject to that, the witness may
24	Q about the relationship? When you spoke to	24	answer.
25	Ms. Beil, do you recall whether it was a meeting	25	MR. FINERTY: I'm having a problem
120	167	20	169
			, 00
1			
1	with her, lunch, dinner? I believe you stated	1	with the question, too, because you jump from
2	yesterday that it was during lunch time.	2	the meeting at Ms. Katy's Diner
2 3	yesterday that it was during lunch time. A I believe it was late morning.		the meeting at Ms. Katy's Diner THE WITNESS: Back.
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	ase Compress Deposition of BARBARA			Sheet 8
1	have an opinion given what you know of the Mayor?	1	Α	Yes.
2	MR. SCHRIMPF: Well, I'll interpose	2	Q	You also stated that in your view and all this we
3	an objection. This is asking for rank	3		will try to make sure that it's sealed for as long
4	speculation, absolutely no evidence to support	4		as we're able to. I don't enjoy asking you these
5	any that she would have an opinion on this.	5		questions but it's my job. You also stated on the
6	MR. ARELLANO: Okay, you're doing	6		record that you believe that the Mayor is asexual.
7	it again, counsel, okay? It's an improper	7	Α	Let me that's strong.
8	objection and there is	8		And I wanted to give you an opportunity to clarify.
9	MR. SCHRIMPF: Objection,	9		Okay.
10	speculation, calls for speculation.	10		At least that's what's on the record.
11	MR. ARELLANO: Thank you, thank	11		Okay.
12	you. You can't read minds, nor do I want to	12		The first question that I have for you is did you
13	engage in a lot of arguments in my	13	~	have an opinion as to whether or not the Mayor has
14	depositions. You can't read what she can or	14		been sexually repressed?
15	cannot do.	15		MR. SCHRIMPF: I didn't hear that.
16	Q All right.	16		I'm sorry, I didn't hear you, the last word.
17	MR. FINERTY: You can answer the	17	0	Do you have an opinion as to whether or not the
18	question.	18	•	Mayor is sexually repressed?
19	A Can you ask it again, I'm sorry?	19	Α	No.
20	Q Let me rephrase it again. It was a pretty bad	20		And when you say no, why do you say that?
21	question. Given what you know and the way you think	21		I'm not qualified to say, I mean.
22	about the Mayor's sexuality, and given that you	22		When you say that the Mayor in your view he is
23	testified that you never witnessed Marilyn Figueroa	23	`	asexual, what did you mean by that?
24	or the Mayor engaged in any type of contact or	24	Α	I meant by that that he showed, never when he was
25	anything that would lead you to believe that there	25		with me or when we were out or anything, interest in
	175	ŀ		177
1	was something going on, do you have any idea, have	1		other women, by comments or anything. He's very
	" ab somedang gonig on, ab you have any raca, have			
12		2		
2	you formed any opinion as to how these sexual	2		unemotional. He's very not demonstrative. I think
3	you formed any opinion as to how these sexual contacts must have taken place?	3		unemotional. He's very not demonstrative. I think probably since 1987 he's hugged me three times.
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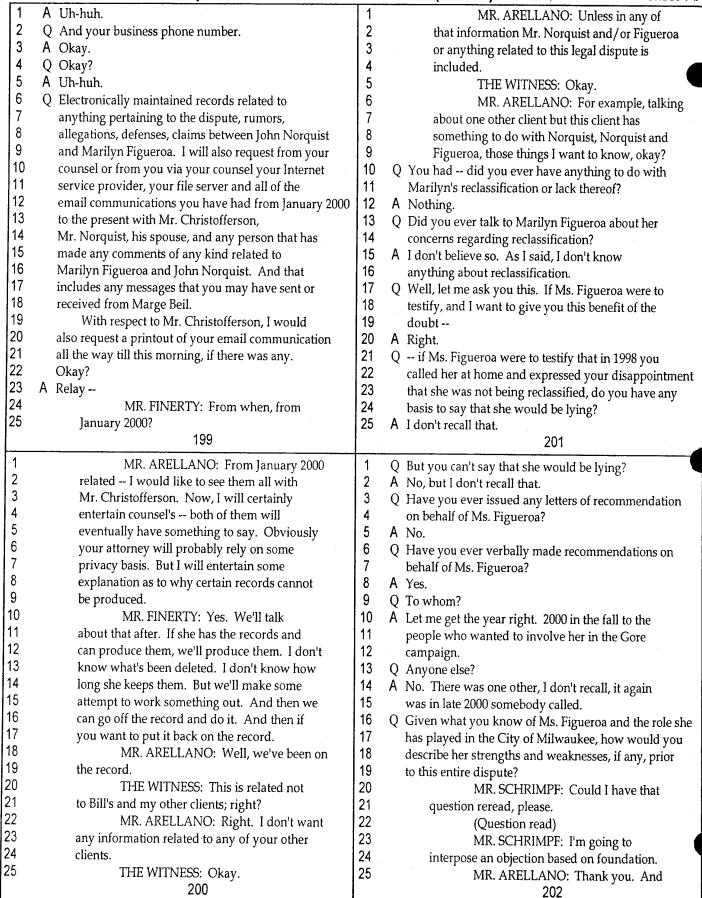
	Cas	se	Compress Deposition of BARBARA	R. C	A١	IDY (VOL. II) 2/1/02 Sheet	<u> </u>
Γ	1	Α	It was a holiday party at Tres Hermanos.	1	Α	No.	
	2		Okay. I will mark this as well.	2		(Discussion off the record)	
1	3	•	MR. FINERTY: What was the year on	3		(Exhibit No. 7 marked for	
١	4		that, '99?	4		identification)	
1	5		THE WITNESS: '98, December '98.	5	Λ	I see another folder for the year 2000 with lists of	
1		0			Ų		
	6	Q	I notice that this folder has a list of participants	6		names. Can you clarify that for me? I'm looking	1
	7		for Tres Hermanos and it has a name of Marilyn?	7		for the 2000.	
	8		Yes.	8		Which names do you want me to clarify?	
	9		1998. What is the significance of that?	9	Q	I'm asking you to clarify whether or not these names	
- 1	10	Α	That Marilyn helped organize this event.	10		pertain to any activity for the year 2000.	
	11		MR. ARELLANO: I want to mark this	11	Α	Yes. They're a fund raiser we had, March 20th,	j
	12		entire folder.	12		2000.	
	13		(Exhibit No. 6 marked for	13	Q	Thank you very much.	
-	14		identification)	14		(Exhibit No. 8 marked for	ı
	15	Q	I'm looking for the folder that may pertain, other	15		identification)	
	16	`	than the Mayor's Club, the folder for the year 2000,	16	0	I'm showing you now a folder that seems to be	
	17		and I don't seem to find it. 2001 right here. I'm	17		identified with the name of Soika.	
	18		placing back these folders. I have handed you	18	Α	Right.	
	19		another folder. Can you identify what year would	19		Is that Mr. Michael Soika?	
	20		that be?	20		That is.	
	21	Δ	This one?	21		Mayor Norquist's chief of staff?	
	22		Yes.	22		Yes.	
	23	•	This is from last fall.	23			
	24		Is that for 2001?	24		And tell me how you end up with this file.	
	25	•	Yes.	25	^	It's a fund raiser that he worked on. And I don't	
1		′`	179	23		know when it was. Three, four years ago. I don't 181	
١٢	1	$\overline{\Omega}$	Can I see that for a second? Thank you. Well, as I	1		holious ho was the shief of staff at that waint	ᅱ
	2	V	look at this record, it's got some dates for	2		believe he was the chief of staff at that point.	
	3		January of 2000. Is that correct? And I'll show	3		(Exhibit No. 9 marked for	
- 1	4		them to you again. I apologize for disorganizing	4	Λ	identification)	
	5		your entire October 30th, right here. It says	5	Q	Let me show you one folder with the name of	
	6		January 1st 5th, 2000?	6	٨	Bill Clay. Yes.	
	7	Δ	•	7			
	8	$\overline{}$	Right. This is who this is a list of whom I			Who is Bill Clay?	
	9	\circ	invited to this event.	8		He is an individual who works at OIC.	- 1
	9 10	Ų	Okay, very good. Let me ask you, save me the calls,	9		For the City of Milwaukee?	
			the phone calls, going back to the dozens of people	10		No. It's a nonprofit organization.	
	11 12		that questioned you about Mayor Norquist and the	11	Q	And can you tell me for what year these records	
	13		rumors about his relationship with Figueroa, did you	12		pertain to?	i
- 1			ever tell any of those individuals that it was not	13		This would have been June '99.	-
	14	۸	true, that the rumors were not true?	14	Q	I'll take that one.	-
	15		Yes.	15		(Exhibit No. 10 marked for	
	16	Ų	Did you ever tell them that the Mayor did you	16	_	identification)	
	7		ever tell anyone that the Mayor denied those rumors?	17	Q	I have a file for the Yacht Club 1999. Tell me if	
	8	A	Anyone that you recall?	18	_	that is accurate.	
	9		That the Mayor.	19	_	Yes.	
	20		Denied.	20	Q	And the records contained therein pertain to the	
	11		Denied them to whom?	21		same year?	
	2		To you.	22		Yes.	
			No.	23	Q	And can you just identify who would have been the	
	4	Q	Did you ever represent that the Mayor denied any	24		person securing these signatures that are contained	
12	5		such rumors?	25		in this many different documents?	
L			180			182	- 1

2 Q Do you know who, if anyone, collected these signatures? 3 A Well, these are again people that just signed in when they came. 4 A Well, these are again people that just signed in when they came. 5 O When they come into the event? 6 A Come in, yes. 9 Q And then there are some pamphlets in here with names of sporosors? 10 A Yes. I would have done that. 10 Q Is that correct? And then there is also here— 12 A That's just the printer's thing. 13 A Yes. I would have done that. 14 a gasin year, what year is that? 15 A '99. 16 Q 1999, okay. Very good. Very good. 17 Gischibi No. 11 marked for identification in dientification in dientification in dientification in the record) 19 Q In all fairness to you, let me tell you that you have records here that belong to the Feingeld Senate Committee. 12 A No. 13 A No. 14 A No. 15 Q And yof these individuals that you may be crossing with John Norquist's political campaign? 16 A No. 17 Q - belong here? 18 A No. The only cornection we have is that Michelle McGrorty worked for Russ Feingold before she came to work for us. 18 A No. 20 Q Nay. This only going to take any of those. 11 have seen this commercial lines policy that Prints whoming to you. 14 A Yes. 15 Q Can you describe, if you will or if you can, what's the significance of that document? 16 Q The campaign for going to take any of those. 16 Q And who pays for this insurance? 17 A When we have this restaurant event every year, 1 need to get insurance to insure all these caterers and the building. So every year it's a one-night policy. 17 Q The Campaign fund? 18 A Yes. 29 Q Ald of the checks that get received during these 20 Q Id of the checks that get received during these 21 A Yes. 20 Q And who pays for this insurance? 21 A The Campaign, the Shilblaki campaign. 22 Q In a gain year, what year is that? 23 Q Have you spoken to him. Christofferson wine mail? 24 A Yes. 25 Q All of the checks that get received during these 26 Q All of the checks that get received during these	1 1	Α	I'm sorry, I'm not	1		events, who manages those checks?
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9 A Yes. I would have done that. 10 A Yes. I would have done that. 11 Q Is that correct? And then there is also here— 12 A That's just the printer's thing. 13 Q All right. We'll mark this document. Is this for again year, what year is that? 14 A yes. 15 A yes. 16 Q 1999, okay. Very good. Very good. 17 (Eshibit No. 11 marked for identification) 18 identification) 19 (Discussion off the record) 19 (Discussion off the record) 20 Q In all fairness to you, let me tell you that you have records here that belong to the Feingold Senate Committee. 21 A Okay. 22 A re they in any way related to the Norquist campaign? 23 A Okay. 24 Q Are they in any way related to the Norquist campaign? 25 Committee. 26 A No. 27 Q Any of these individuals that you may be crossing with John Norquist's political campaign? 28 A No. 29 A No. 20 Q Any of these individuals that you may be crossing with John Norquist's political campaign? 30 with John Norquist's political campaign? 4 A No. 5 Q So those records do not— 6 A No. 6 Q So those records do not— 6 A No. 7 Q - belong here? 8 A No. The only connection we have is that I'm showing to you. 11 A Yes. 12 Q Can you describe, if you will or if you can, what's the significance of that document? 12 A When we have this restaurant event every year, I need to get insurance to insure all these caterors and the building. So every year it's a one-night policy. 20 Q The campaign fund? 21 A Yes. 22 A The campaign. 23 A Pies. 24 A Yes. 25 A Yes. 26 Is lauked to the subpoena that we sent you; is that correct? 27 A No. 28 Bank One. 19 Q Did you uselected those records that you felt applied to the subpoena that we sent you; is that correct? 29 A The campaign of John Norquist before bringing these records? 20 Q Have you spoken to Mr. Christofferson about your deposition because I didn't know what to do with that TV camera in my yard. 30 Q Before or after your deposition because I didn't know what to do with that TV camera in my yard. 31 Q Did you discuss anything else in the email? 32 A I sale. La I am fine. 33						· · ·
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1		ompress Deposition of BARBARA		ANDT (VOL. II) 2/1/02 Officer 17
1	Q	Did you discuss anything about your testimony?	1	names. Are you able to tell me for what year this
2	A	No, no.	2	particular list was gathered?
3	0	Did you ever meet with Mr. Christofferson or	3	A No, I can't on this one.
4	`	John Norquist when you learned that you were going	4	Q Okay, very good. I've got here as part of the
5		to be deposed? From the very first time that you	5	records that you produced a facsimile from the
6		received notice or you became aware that you were	6	Michael Best & Friedrich law firm with some
7		going to be deposed have you spoken to them?	7	attachments from a Barbara Boxer, B-O-X-E-R, with a
8	Δ	Have I spoken to them? Yes. I mean about being	8	list of names. Can you tell me, No. 1, what these
9	٠,	deposed?	9	records purport to represent?
10	Ω	Yes.	10	A Can I see the file?
11		No. I don't even know if the Mayor knows that I'm	11	Q Sure, you can. Anything you can do to help.
12		•	12	A She does an event for the Mayor. No, I don't know.
13	_	being deposed. What about Mr. Christofferson?	13	l actually don't know what this is. I have no idea.
			14	This is not
14		Yes, I have spoken to him.	15	Q Do you have any clue as to how these records ended
15		What did you discuss with him?	16	
16	А	Nothing other than I was being deposed and I was		up in your possession?
17	_	going to get a lawyer.	17	A I think that it's probably something I used as a
18	Q	Did anything was discussed with respect to	18	mailing list.
19		Christofferson's position regarding the Mayor and	19	Q All right.
20		Marilyn Figueroa?	20	MR. ARELLANO: Go ahead and mark
21		No, no.	21	this. Anything else you want to see?
22	Q	I have a list of I believe businesses here; is that	22	(Discussion off the record)
23		correct?	23	(Exhibit No. 13 marked for
24	Α	Well, depending what year this is, this is again a	24	identification)
25		list of restaurants that will participate in a 187	25	MR. FINERTY: A more technical, or 189
1		restaurant event. This looks recent from the last	1	a more housekeeping measure. Did you mention
2		couple years.	2	to him about the files?
		• •		
13	0	I have here a page that indicates the name of		
3	Q	I have here a page that indicates the name of Michal Dawson, D-A-W-S-O-N.	3	THE WITNESS: No.
4		Michal Dawson, D-A-W-S-O-N.	3 4	THE WITNESS: No. MR. FINERTY: If you take something
4 5	Α	Michal Dawson, D-A-W-S-O-N. Uh-huh.	3 4 5	THE WITNESS: No. MR. FINERTY: If you take something out of a file, maybe we ought to give it to
4 5 6	A Q	Michal Dawson, D-A-W-S-O-N. Uh-huh. For John Norquist?	3 4 5 6	THE WITNESS: No. MR. FINERTY: If you take something out of a file, maybe we ought to give it to her and she'll put it in a separate file
4 5 6 7	A Q A	Michal Dawson, D-A-W-S-O-N. Uh-huh. For John Norquist? Uh-huh.	3 4 5 6 7	THE WITNESS: No. MR. FINERTY: If you take something out of a file, maybe we ought to give it to her and she'll put it in a separate file rather than putting it back in there because
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Ca	se Compress Deposition of BARBARA	K. C	'AN	IDY (VOL. II) 2/1/02 Sheet 12.
1	identification)	1	Α	Yes.
2	Q Let me show you a document that I retrieved from the	2	Q	Is that right?
3	box that you produced today. Can you identify this	3	À	Yes.
4	document for the record?	4	0	We're going to mark these three documents together
5	A It's just a list of people in real estate. It's	5	`	related to Women's Events Sponsors, Women in
6	again a mailing list.	6		Leadership List and the invitation to
7	Q And these are individuals who were at least	7		John Norquist's event. Is that okay?
8	contacted on behalf of Mayor Norquist?	8	Α	Yes.
9	A Well, they would if you cut if you consider	9	•	(Exhibit No. 16 marked for
10	getting a piece of mail contact.	10		identification)
11	Q Okay, that's fine.	11		MR. ARELLANO: In fact, if you
12	A Did I phone them? No.	12		don't object, counsel, I'm going to add to
13	Q Okay. I'll mark that.	13		that same exhibit a letter that purports to be
14	(Exhibit No. 15 marked for	14		signed by John Norquist dated November 5th,
15	identification)	15		
16	Q I'm also showing you a set of records titled Women	16	Ω	1999, making reference to the women's event.
	•	1		Is that correct?
17 18	in Leadership Attendee List? A Yes.	17 18		Yes.
		1	Ų	Witness? And I have to call you ma'am, witness.
19 20	Q Did I read that correctly?	19		MR. SCHRIMPF: There's also some
	A Yes.	20		handwritten material on the back of that
21 22	Q And Women's Event Sponsors?	21 22		letter. Is that part of the exhibit?
	A Yes.			MR. ARELLANO: Yes, why don't we do
23	Q Can you tell me the purpose for collecting these	23		that if you have no objection. We will make
24	records?	24		this a part and incorporate with Exhibit 16.
25	A Well, this was a mailing list.	25		Do you have any objection?
	191			193
1	Q Okay.	1		MR. SCHRIMPF: That's fine.
2	A This was a list of sponsors on that invitation.	2	Q	Now, let me ask you this, Ms. Candy, do you recall
3	Q You're referring to the Women's Event Sponsors?	3		whether or not in 1999, late 1999 or January,
4	A Yes.	4		February or March of the year 2000 before
5	Q And the women's list obviously is the one entitled	5		Mayor Norquist was re-elected, whether or not any
6	Women Attendee List; is that correct?	6		women, women's groups, associations ever inquired
7	A Yes.	7		through you about the rumors related to
8	Q Do you recall whether or not, or do you know whether	8		Mayor Norquist and Marilyn Figueroa?
9	or not any of the individuals contained in these	9		No, they did not.
10	lists were also contacted for purposes of supporting	10	Q	Have you ever received any letters, correspondence,
11	Mayor Norquist?	11		cards, communication of any kind, including emails,
12	A Again, these people would likely have gotten an	12		in which taxpayers or citizens of Milwaukee or from
13	invitation.	13		any area were questioning these rumors before he was
14	Q These people meaning the Women in Leadership	14		re-elected?
15	Attendee List	15	Α	No.
16	A Right.	16	Q	Do you know whether or not the campaign organization
17	Q that you are producing here? And what about the	17		or any member of the campaign organization received
18	event sponsors? Do you think that they would also	18		any letters from voters or contributors or citizens
19	be part of your	19		from any source regarding those rumors before
20	A Yes.	20		Mayor Norquist was elected?
21	Q record?	21	Α	I would have no way of knowing that, not to my
22	A These people on this invitation.	22		knowledge.
23	Q And this invitation meaning a pamphlet that you are	23	Q	No one ever brought any of these issues to your
24	showing me inviting people to the Mayor's reception	24	`	attention?
25	on December 9th of 1999?	25	Α	Mail? No, no.
	192			194

2 was re-elected in April of the year 2000 any other campaign organization member raised or mentioned the companyin organization member raised or mentioned the companying flows that provided the companying flows the City All raise or members and raised companying flows the City All raised or members and raised companying flows the City All raised or members and raised companying flows the companying flows and reviews. You have any expertaining to Marity Fligueroa? 2 Nature volume the fair and accurate to say that you do not have accurate to say that you d	Ca	ase Compress Deposition of BARBARA			
2 Subtactorrect? And you have never worked on ar campaign organization member raised or mentioned those runtors in your presence? 3 No. O Including Michelle and Christofferson, any of those individuals? 4 A From January 1st to whenever it closed down, I never was inside that campaign headquarters. 10 Q All right, very good. 11 A A yean, that's all part of that. It's all mailing lists for that. 12 Q From that exhibit? 14 A Yes. 15 Q I want to keep them together and I'm sure you do to too. 17 A Yes, I do, please. 18 MR. FINERTY: It goes with this exhibit? Just 16-A. 20 MR. ARELLANO: Well, let's just mark this as a - MR. ARELLANO: Well, let's just was an ecopy with page I1. Oh, we do, okay. You got if? And does it say amended notice of taking deposition and subpoena duces tecum. You gott? 1 A Yes. MR. SCHRIMPF: We do not have a copy with page I2. Oh, we do, okay. You got if? MR. ARELLANO: Well went and the copy of taking deposition and subpoena duces tecum. You gott? 1 A Yes. MR. SCHRIMPF: Yes. MR. SCHRIMPF: Yes. MR. ARELLANO: It's the amended notice of taking deposition and subpoena duces tecum. You gott? MR. ARELLANO: It's the amended notice of taking deposition and subpoena duces tecum. You gott? MR. ARELLANO: It's the amended notice of taking deposition and subpoena duces tecum. You gott? MR. ARELLANO: It's the amended notice of taking deposition and subpoena duces tecum. You gott? MR. ARELLANO: It's the amended notice of taking deposition and subpoena duces tecum. You gott? MR. ARELLANO: It's the amended notice of taking deposition and subpoena duces tecum. You gott? MR. ARELLANO: It's the amended notice of taking deposition and subpoena duces tecum. You gott? MR. ARELLANO: It's the amended notice of taking deposition and subpoena duces tecum. You gott? MR. ARELLANO: It's the amended notice of taking deposition and subpoena duces tecum. You gott? MR. ARELLANO: It's the amended notice of taking deposition and subpoena duces tecum. You gott?	Γ1	O Do you recall whether or not before Mayor Norquist	1	Α	That's right.
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A Right. A No. A No.			3		projects paid by the City of Milwaukee?
5 A No. 6 Q Including Michelle and Christofferson, any of those individuals? 8 A From January 1st to whenever it closed down, I never was inside that campaign headquarters. 10 Q All right, very good. 11 A A Again, that's all part of that. It's all mailing lists for that. 13 Q For that exhibit? 14 A Yes. 15 Q I want to keep them together and I'm sure you do to too. 16 too. 17 A Yes, I do, please. 18 MR. ARELLANO. Well, let's just mark this as a			l .	Δ	
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9 A That would be correct. 10 Q All right, very good. 11 A Again, that's all part of that. It's all mailing 12 lists for that. 13 Q For that exhibit? 14 A Yes. 15 Q I want to keep them together and I'm sure you do 16 too. 17 A Yes, I do, please. 18 MR. ARELLANO: Well, let's just 19 mark this as a - 20 MR. FINERTY: It goes with this 21 exhibit? Just 16-A. 22 MR. ARELLANO: 16-A. There we go. 23 Experience always prevails. 24 (16-A marked for identification) 25 Q Do you have a copy of Exhibit No. 1, Ms. Candy? 26 Q Do you have a copy of Exhibit No. 1, Ms. Candy? 27 MR. SCHRIMPF: We do not have a copy with page 11. Oh, we do, okay. You got it? And does it say amended notice, counsel? 28 MR. SCHRIMPF: Yes. 29 MR. FINERTY: It's just the only discrepancy was you apparently faxed the City of Mirwalter to the door. 29 Q So you have all of the pages? 20 Q So you have all of the pages? 21 A Yes. 22 MR. SCHRIMPF: Yes. 33 Good Memoranda regarding Marilyn Figue on And if we can come some stipulation on some of these issues, wonder lift not, we'll bring you back or we'll make a reques from the judge. 20 Q Let's go to the first – to page No. 2. I believe you testified y esterday that you have never been an given the page vour of the subponen authors. 21 Office? 22 A No. 23 Q Let's go to the first – to page No. 2. I believe you testified y esterday that you have never been an given the page vour directive in that you produce, among other things, performan reviews. You have never issued performance revies that your produce, among other things, performan reviews. You have never issued performance revies that your down, and it at you produce, among other things, performan reviews. You have never issued performance revies to Marity No. May never verbal? 24 A No. 25 Q On campaign issues? 26 Q On campaign issues? 27 A No. 28 Q To out never felt that Marilyn Figueroa was not competent? 29 A No. 30 Q Or that she had disregarded your directive in any way? 31 A No. 32 Q Do you have any directive in any way? 32 A No. 33 Q Or that she had	8	A From January 1st to whenever it closed down, I never	8		files pertaining to Marilyn Figueroa?
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	ase Compress Deposition of DANDANA			151 (10111) 11101
1	that's a good point.	1		comes down to personal matters that affect her
2	Q I ask you that question because I believe you've	2		feelings, you won't have any basis to deny that?
3	testified that you have known Ms. Figueroa for a	3	Α	No.
4	long time?	4	0	Did you ever had any input with Mayor Norquist with
	A Yes.	5	~	respect to who would be granted a block grant?
5		6	. Δ	No.
6	Q True? And that you have respect for her competence?	7		
7	A Yes.		Ų	Have you ever seen anywhere, including involving,
8	Q And for her work, hard work?	8		including the Mayor, Mayor's residence, Mayor's
9	A Yes.	9		office, any letters, cards, memos written to
10	Q And I believe you know her well, at least from a	10		Mayor Norquist from Marilyn Figueroa?
11	professional stand in what you do?	11	Α	No.
12	A In what she did with me, yes, yes.	12	Q	Have you ever seen any letters, cards written from
13	Q Exactly. And based on that now I ask you to answer	13	`	Mayor Norquist to Marilyn?
14	my previous question. Would you like that question	14	Α	No.
15	read again?	15		When Marilyn was working with you, whenever she did,
	MR. SCHRIMPF: Well, the objection	16	V	did you ever receive any complaints from the public
16	,			
17	still stands, counsel, because you haven't	17	٨	or the folks that you
18	laid the foundation.	18		No.
19	MR. ARELLANO: Noted. Go ahead.	19		were seeking to endorse?
20	You can answer my question.	20		No.
21	MR. FINERTY: You can answer.	21	Q	Do you keep any files of any aides to
22	A I'm sorry. What are Marilyn's strengths, is that	22		Mayor Norquist, files of any kind?
23	what you asked me?	23	Α	No.
24	Q Yes. In the City of Milwaukee.	24	0	With respect to the hours that someone that works
25	MR. SCHRIMPF: Just so that it's	25	•	for Mayor Norquist, with respect to the hours that
-	203			205
<u> </u>				
1	very clear for the record, objection still	1		that staff member spends in political activities,
2	very clear for the record, objection still stands based on foundation.	2		how are those records kept? How do you keep track
		1		
2	stands based on foundation.	2		how are those records kept? How do you keep track
2 3 4	stands based on foundation. MR. ARELLANO: Noted three times. Q Go ahead.	2 3 4	A	how are those records kept? How do you keep track of the hours or how do they keep track of the hours, if you know?
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1		y type of calendar in any fashion, whether it's	1		you ever feel the need, did you ever feel the need
2		st notes here, notes there, in a matches box or in	2		to keep notes on your communication with
3	•	ur computer. Nothing?	3		John Norquist?
4	A No	· ·	4		No.
5		ow do you keep track of all these hundreds of	5	Q	To your knowledge, has Mayor Norquist ever been sued
6		ntacts that you make?	6		before?
7		aving a calendar is not keeping track of contacts.	7	Α	I wouldn't know.
8	I ke	eep track of the contacts by this.	8	Q	You are not aware of any?
9	Q Log		9		No, I said I wouldn't know.
10		y lists, yes.	10	Q	But you're not aware of any one other time when he
11		hat about Mr. Norquist? Do you ever keep his	11		has been sued?
12		endar?	12		No.
13	A No.		13	Q	Do you ever keep any type of communication with
14		nen you have scheduled an event or an appearance on	14		Ms. Deanna Delaney?
15		half of Mr. Norquist, do you go through Ruth?	15		I don't even know who that is.
16	A Yes		16		You don't know who she is.
17		hat right?	17		No.
18	A Yes		18	Q	Well, that simplifies my work.
19	-	d so she writes it down?	19		MR. SCHRIMPF: I'm sorry, I didn't
20	A Yes.		20		hear that, counsel.
21		d then that's the way he does. So you don't have	21		MR. ARELLANO: It wasn't very
22		y calendars?	22		important, but you're entitled to hear it.
23		ave no calendars.	23		MR. SCHRIMPF: Thank you.
24		u don't have any calendars of your contacts with	24		MR. ARELLANO: When somebody tells
25	Mr.	. Christofferson? Any type of daily	25		me they don't know, that simplifies my work.
		207			209
					** ** ** *****************************
1	A No.		1	Q	Now, request No. 11 requires that you provide all
2		chedule?	1 2	Q	Now, request No. 11 requires that you provide all records related to political and fund raiser events
2	Q sc A Of r	chedule? my contacts?	1	Q	
2 3 4	Q so A Of r Q Corr	chedule? my contacts? rrect.	2	Q	records related to political and fund raiser events for the time period of January 1st, 1995 through February 2000. I believe you have provided a number
2 3 4 5	Q - so A Of r Q Cor A No.	chedule? my contacts? rrect.	2 3 4 5		records related to political and fund raiser events for the time period of January 1st, 1995 through February 2000. I believe you have provided a number of records this morning?
2 3 4 5 6	Q - sc A Of r Q Corr A No. Q You	chedule? my contacts? rrect. u mentioned yesterday that when a political	2 3 4 5 6	Α	records related to political and fund raiser events for the time period of January 1st, 1995 through February 2000. I believe you have provided a number of records this morning? Right.
2 3 4 5 6 7	Q - so A Of r Q Corr A No. Q You cam	chedule? my contacts? rrect u mentioned yesterday that when a political npaign is going the Mayor visits you regularly.	2 3 4 5 6 7	Α	records related to political and fund raiser events for the time period of January 1st, 1995 through February 2000. I believe you have provided a number of records this morning? Right. Are those records in your view responsive of request
2 3 4 5 6 7 8	Q sc A Of r Q Corr A No. Q You cam And	chedule? my contacts? rrect u mentioned yesterday that when a political npaign is going the Mayor visits you regularly. d I think you used the word daily; is that	2 3 4 5 6 7 8	A Q	records related to political and fund raiser events for the time period of January 1st, 1995 through February 2000. I believe you have provided a number of records this morning? Right. Are those records in your view responsive of request No. 11?
2 3 4 5 6 7 8 9	Q sc A Of r Q Corn A No. Q You cam And corr	chedule? my contacts? rrect u mentioned yesterday that when a political npaign is going the Mayor visits you regularly. d I think you used the word daily; is that rect?	2 3 4 5 6 7 8 9	A Q A	records related to political and fund raiser events for the time period of January 1st, 1995 through February 2000. I believe you have provided a number of records this morning? Right. Are those records in your view responsive of request No. 11? Responsive as I can be.
2 3 4 5 6 7 8 9	Q sc A Of r Q Corr A No. Q You cam And corr A Yes.	chedule? my contacts? rrect u mentioned yesterday that when a political npaign is going the Mayor visits you regularly. d I think you used the word daily; is that rect?	2 3 4 5 6 7 8 9	A Q A	records related to political and fund raiser events for the time period of January 1st, 1995 through February 2000. I believe you have provided a number of records this morning? Right. Are those records in your view responsive of request No. 11? Responsive as I can be. What did you do in order to comply with request
2 3 4 5 6 7 8 9 10	Q sc A Of r Q Corr A No. Q You cam And corr A Yes. Q Is th	chedule? my contacts? rrect u mentioned yesterday that when a political npaign is going the Mayor visits you regularly. d I think you used the word daily; is that rect? i. hat still the practice today?	2 3 4 5 6 7 8 9 10	A Q A	records related to political and fund raiser events for the time period of January 1st, 1995 through February 2000. I believe you have provided a number of records this morning? Right. Are those records in your view responsive of request No. 11? Responsive as I can be. What did you do in order to comply with request No. 11? Just tell me the procedure that you
2 3 4 5 6 7 8 9 10 11 12	Q sc A Of r Q Corr A No. Q You cam And corr A Yes. Q Is th A No.	chedule? my contacts? rrect. u mentioned yesterday that when a political npaign is going the Mayor visits you regularly. d I think you used the word daily; is that rect? s. hat still the practice today?	2 3 4 5 6 7 8 9 10 11	A Q A Q	records related to political and fund raiser events for the time period of January 1st, 1995 through February 2000. I believe you have provided a number of records this morning? Right. Are those records in your view responsive of request No. 11? Responsive as I can be. What did you do in order to comply with request No. 11? Just tell me the procedure that you followed in order to collect all these records.
2 3 4 5 6 7 8 9 10 11 12 13	Q sc A Of r Q Corr A No. Q You cam And corr A Yes. Q Is th A No. Q Whe	chedule? my contacts? rrect. u mentioned yesterday that when a political npaign is going the Mayor visits you regularly. d I think you used the word daily; is that rect? that still the practice today? then did that practice stop?	2 3 4 5 6 7 8 9 10 11 12 13	A Q A Q	records related to political and fund raiser events for the time period of January 1st, 1995 through February 2000. I believe you have provided a number of records this morning? Right. Are those records in your view responsive of request No. 11? Responsive as I can be. What did you do in order to comply with request No. 11? Just tell me the procedure that you followed in order to collect all these records. I opened my file drawers for the years and pulled
2 3 4 5 6 7 8 9 10 11 12 13 14	Q sc A Of r Q Corr A No. Q You cam And corr A Yes. Q Is th A No. Q Whe A As s	chedule? my contacts? rrect u mentioned yesterday that when a political npaign is going the Mayor visits you regularly. d I think you used the word daily; is that rect? b. that still the practice today? . then did that practice stop? soon as the election was over.	2 3 4 5 6 7 8 9 10 11 12 13 14	A Q A Q A	records related to political and fund raiser events for the time period of January 1st, 1995 through February 2000. I believe you have provided a number of records this morning? Right. Are those records in your view responsive of request No. 11? Responsive as I can be. What did you do in order to comply with request No. 11? Just tell me the procedure that you followed in order to collect all these records. I opened my file drawers for the years and pulled them out.
2 3 4 5 6 7 8 9 10 11 12 13 14 15	Q sc A Of r Q Corr A No. Q You cam And corr A Yes. Q Is th A No. Q Whe A As s Q In A	chedule? my contacts? rrect u mentioned yesterday that when a political npaign is going the Mayor visits you regularly. d I think you used the word daily; is that rect? s. hat still the practice today? . uen did that practice stop? soon as the election was over. April of 2000?	2 3 4 5 6 7 8 9 10 11 12 13 14 15	A Q A Q A Q	records related to political and fund raiser events for the time period of January 1st, 1995 through February 2000. I believe you have provided a number of records this morning? Right. Are those records in your view responsive of request No. 11? Responsive as I can be. What did you do in order to comply with request No. 11? Just tell me the procedure that you followed in order to collect all these records. I opened my file drawers for the years and pulled them out. Did anyone assist you in doing that?
2 3 4 5 6 7 8 9 10 11 12 13 14 15 16	Q - sc A Of r Q Corr A No. Q You cam And corr A Yes. Q Is th A No. Q Whe A As s Q In A A 2000	chedule? my contacts? rrect. u mentioned yesterday that when a political npaign is going the Mayor visits you regularly. d I think you used the word daily; is that rect? s. hat still the practice today? . nen did that practice stop? soon as the election was over. April of 2000? 0.	2 3 4 5 6 7 8 9 10 11 12 13 14 15 16	A Q A Q A	records related to political and fund raiser events for the time period of January 1st, 1995 through February 2000. I believe you have provided a number of records this morning? Right. Are those records in your view responsive of request No. 11? Responsive as I can be. What did you do in order to comply with request No. 11? Just tell me the procedure that you followed in order to collect all these records. I opened my file drawers for the years and pulled them out. Did anyone assist you in doing that? No.
2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17	Q sc A Of r Q Corr A No. Q You cam And corr A Yes. Q Is th A No. Q Whe A As s Q In A A 2000 Q Now	chedule? my contacts? rrect. u mentioned yesterday that when a political npaign is going the Mayor visits you regularly. d I think you used the word daily; is that rect? that still the practice today? then did that practice stop? soon as the election was over. April of 2000? 0. w, how often do you get to see the Mayor in	2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17	A Q A Q A	records related to political and fund raiser events for the time period of January 1st, 1995 through February 2000. I believe you have provided a number of records this morning? Right. Are those records in your view responsive of request No. 11? Responsive as I can be. What did you do in order to comply with request No. 11? Just tell me the procedure that you followed in order to collect all these records. I opened my file drawers for the years and pulled them out. Did anyone assist you in doing that? No. When Marilyn Figueroa was working with the political
2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18	Q sc A Of r Q Corr A No. Q You cam And corr A Yes. Q Is th A No. Q Whe A As s Q In A A 2000 Q Now pers	chedule? my contacts? rrect. u mentioned yesterday that when a political npaign is going the Mayor visits you regularly. d I think you used the word daily; is that rect? that still the practice today? then did that practice stop? soon as the election was over. April of 2000? u, how often do you get to see the Mayor in soo?	2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18	A Q A Q A	records related to political and fund raiser events for the time period of January 1st, 1995 through February 2000. I believe you have provided a number of records this morning? Right. Are those records in your view responsive of request No. 11? Responsive as I can be. What did you do in order to comply with request No. 11? Just tell me the procedure that you followed in order to collect all these records. I opened my file drawers for the years and pulled them out. Did anyone assist you in doing that? No. When Marilyn Figueroa was working with the political campaign for John Norquist, do you know if she was
2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18 19	Q sc A Of r Q Corr A No. Q You cam And corr A Yes. Q Is th A No. Q Whe A As s Q In A A 2000 Q Now pers A Now	chedule? my contacts? rrect u mentioned yesterday that when a political mpaign is going the Mayor visits you regularly. d I think you used the word daily; is that rect? s. hat still the practice today? . uen did that practice stop? soon as the election was over. April of 2000? 0. w, how often do you get to see the Mayor in soon? w, you mean currently?	2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18 19	A Q A Q A Q	records related to political and fund raiser events for the time period of January 1st, 1995 through February 2000. I believe you have provided a number of records this morning? Right. Are those records in your view responsive of request No. 11? Responsive as I can be. What did you do in order to comply with request No. 11? Just tell me the procedure that you followed in order to collect all these records. I opened my file drawers for the years and pulled them out. Did anyone assist you in doing that? No. When Marilyn Figueroa was working with the political campaign for John Norquist, do you know if she was given some sort of a written job description?
2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18 19 20	Q - sc A Of r Q Corr A No. Q You cam And corr A Yes. Q Is th A No. Q Whe A As s Q In A A 2000 Q Now pers A Now Q Corr	chedule? my contacts? rrect u mentioned yesterday that when a political npaign is going the Mayor visits you regularly. d I think you used the word daily; is that rect? s. hat still the practice today? . nen did that practice stop? soon as the election was over. April of 2000? 0. w, how often do you get to see the Mayor in son? w, you mean currently? rrect.	2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18 19 20	A Q A Q A Q A Q	records related to political and fund raiser events for the time period of January 1st, 1995 through February 2000. I believe you have provided a number of records this morning? Right. Are those records in your view responsive of request No. 11? Responsive as I can be. What did you do in order to comply with request No. 11? Just tell me the procedure that you followed in order to collect all these records. I opened my file drawers for the years and pulled them out. Did anyone assist you in doing that? No. When Marilyn Figueroa was working with the political campaign for John Norquist, do you know if she was given some sort of a written job description? I wouldn't know that.
2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18 19 20 21	Q sc A Of r Q Corr A No. Q You cam And corr A Yes. Q Is th A No. Q Whe A As s Q In A A 2000 Q Now pers A Now Q Corr A Curr	chedule? my contacts? rrect u mentioned yesterday that when a political npaign is going the Mayor visits you regularly. d I think you used the word daily; is that rect? s. hat still the practice today? . uen did that practice stop? soon as the election was over. April of 2000? 0. w, how often do you get to see the Mayor in son? w, you mean currently? rrect. rrently. Once or twice a week.	2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18 19 20 21	A Q A Q A Q A Q	records related to political and fund raiser events for the time period of January 1st, 1995 through February 2000. I believe you have provided a number of records this morning? Right. Are those records in your view responsive of request No. 11? Responsive as I can be. What did you do in order to comply with request No. 11? Just tell me the procedure that you followed in order to collect all these records. I opened my file drawers for the years and pulled them out. Did anyone assist you in doing that? No. When Marilyn Figueroa was working with the political campaign for John Norquist, do you know if she was given some sort of a written job description? I wouldn't know that. Was there a plan within the organization, was there
2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18 19 20 21 22	Q sc A Of r Q Corr A No. Q You cam And corr A Yes. Q Is th A No. Q Whe A As s Q In A A 2000 Q Now pers A Now Q Corr A Curr Q Is th	chedule? my contacts? rrect. u mentioned yesterday that when a political npaign is going the Mayor visits you regularly. d I think you used the word daily; is that rect? that still the practice today? then did that practice stop? soon as the election was over. April of 2000? w, how often do you get to see the Mayor in son? w, you mean currently? trect. rrently. Once or twice a week. that specific days that you get to see him?	2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18 19 20 21 22	A Q A Q A Q A Q	records related to political and fund raiser events for the time period of January 1st, 1995 through February 2000. I believe you have provided a number of records this morning? Right. Are those records in your view responsive of request No. 11? Responsive as I can be. What did you do in order to comply with request No. 11? Just tell me the procedure that you followed in order to collect all these records. I opened my file drawers for the years and pulled them out. Did anyone assist you in doing that? No. When Marilyn Figueroa was working with the political campaign for John Norquist, do you know if she was given some sort of a written job description? I wouldn't know that. Was there a plan within the organization, was there a plan, including the Mayor, as to what areas
2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18 19 20 21 22 23	Q sc A Of r Q Corr A No. Q You cam And corr A Yes. Q Is th A No. Q Whe A As s Q In A A 2000 Q Now pers A Now Q Corr A Curr Q Is th A No.	chedule? my contacts? rrect u mentioned yesterday that when a political mpaign is going the Mayor visits you regularly. d I think you used the word daily; is that rect? s. hat still the practice today? . ten did that practice stop? soon as the election was over. April of 2000? 0. w, how often do you get to see the Mayor in son? w, you mean currently? rect. rrently. Once or twice a week. hat specific days that you get to see him? t now. And this is for an abbreviated time,	2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18 19 20 21 22 23	A Q A Q A Q A Q	records related to political and fund raiser events for the time period of January 1st, 1995 through February 2000. I believe you have provided a number of records this morning? Right. Are those records in your view responsive of request No. 11? Responsive as I can be. What did you do in order to comply with request No. 11? Just tell me the procedure that you followed in order to collect all these records. I opened my file drawers for the years and pulled them out. Did anyone assist you in doing that? No. When Marilyn Figueroa was working with the political campaign for John Norquist, do you know if she was given some sort of a written job description? I wouldn't know that. Was there a plan within the organization, was there a plan, including the Mayor, as to what areas Ms. Figueroa would be concentrating on?
2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18 19 20 21 22 23 24	Q sc A Of r Q Corr A No. Q You cam And corr A Yes. Q Is th A No. Q Whe A As s Q In A A 2000 Q Now pers A Now Q Corr A Curr Q Is th A No.	chedule? my contacts? rrect. u mentioned yesterday that when a political inpaign is going the Mayor visits you regularly. It is that rect? s. hat still the practice today? hen did that practice stop? soon as the election was over. April of 2000? 0. w, how often do you get to see the Mayor in son? w, you mean currently? rrect. rrently. Once or twice a week. hat specific days that you get to see him? t now. And this is for an abbreviated time, ause we're working on a School Board race.	2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18 19 20 21 22 23 24	A Q A Q A Q A Q A	records related to political and fund raiser events for the time period of January 1st, 1995 through February 2000. I believe you have provided a number of records this morning? Right. Are those records in your view responsive of request No. 11? Responsive as I can be. What did you do in order to comply with request No. 11? Just tell me the procedure that you followed in order to collect all these records. I opened my file drawers for the years and pulled them out. Did anyone assist you in doing that? No. When Marilyn Figueroa was working with the political campaign for John Norquist, do you know if she was given some sort of a written job description? I wouldn't know that. Was there a plan within the organization, was there a plan, including the Mayor, as to what areas Ms. Figueroa would be concentrating on? I don't know.
2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18 19 20 21 22 23	Q sc A Of r Q Corr A No. Q You cam And corr A Yes. Q Is th A No. Q Whe A As s Q In A A 2000 Q Now pers A Now Q Corr A Curr Q Is th A No.	chedule? my contacts? rrect u mentioned yesterday that when a political mpaign is going the Mayor visits you regularly. d I think you used the word daily; is that rect? s. hat still the practice today? . ten did that practice stop? soon as the election was over. April of 2000? 0. w, how often do you get to see the Mayor in son? w, you mean currently? rect. rrently. Once or twice a week. hat specific days that you get to see him? t now. And this is for an abbreviated time,	2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18 19 20 21 22 23	A Q A Q A Q A Q A	records related to political and fund raiser events for the time period of January 1st, 1995 through February 2000. I believe you have provided a number of records this morning? Right. Are those records in your view responsive of request No. 11? Responsive as I can be. What did you do in order to comply with request No. 11? Just tell me the procedure that you followed in order to collect all these records. I opened my file drawers for the years and pulled them out. Did anyone assist you in doing that? No. When Marilyn Figueroa was working with the political campaign for John Norquist, do you know if she was given some sort of a written job description? I wouldn't know that. Was there a plan within the organization, was there a plan, including the Mayor, as to what areas Ms. Figueroa would be concentrating on?

Ca	ase Compress Deposition of BARBARA			
1	supposed to concentrate?	1		events or fund raisers from '95 through 2000. And
2	A No, other than what she was doing with me.	2		you produced a lot of those records today. Did you
3	Q You don't have obviously any sick leave or vacation	3		exclude any for any reason?
4	records that would pertain to Ms. Figueroa?	4	Α	Well, I didn't go back to '95, but that would be
		5	• •	more something that would be on Ruth's calendar than
5	A No.	6		I would have access to.
6	Q For the time that she was working on the political		^	
7		7	Q	Is that pretty much the way it works? Ruth pretty
8		8		much keeps track of the calendar?
9	Q Is that correct? Do you ever get involved in Common	9		Totally.
10	Council activities?	10	Q	Are you aware of any journalist that questioned
11	1 A No. Well, excuse me. You mean the actual.	11		John Norquist about his alleged relationship with
12	Q Right.	12		Marilyn Figueroa?
13		13	Α	No.
14		14	Q	Before December?
15		15	Α	No.
16		16	0	Did you get any phone calls from any journalist ever
17		17	`	among the dozens of people that were questioning
18		18		you, did you ever get about the affair or the
19	, 0	19		relationship or the exchange between Marilyn and
		20		John Norquist? Were there ever any journalists that
20		21		* * * * * * * * * * * * * * * * * * * *
21			٨	called you to question you on this issue?
22	• • • • • • • • • • • • • • • • • • • •	22		In what time frame?
23	1 0	23	Q	Late November of '99, December or January through
24	₹ 4	24		April of 2000.
25		25	Α	No, no.
- 1	211			213
- 1				
	A No.	1	0	What about after that?
1 2		1 2	,	What about after that? Yes, there's a very persistent Channel 4 reporter
2	Q Meals?	2	,	Yes, there's a very persistent Channel 4 reporter
3	Q Meals? B A No.	2 3	À	Yes, there's a very persistent Channel 4 reporter that calls me, but I've never spoken to them.
2 3 4	Q Meals?A No.Q That all is on your own ticket?	2 3 4	A Q	Yes, there's a very persistent Channel 4 reporter that calls me, but I've never spoken to them. Who is that?
2 3 4 5	Q Meals? A No. C That all is on your own ticket? A Yes, yes.	2 3 4 5	A Q A	Yes, there's a very persistent Channel 4 reporter that calls me, but I've never spoken to them. Who is that? I don't know her name.
2 3 4 5 6	Q Meals? A No. C That all is on your own ticket? A Yes, yes. C Request No. 18 requires that you produce names of	2 3 4 5 6	A Q A Q	Yes, there's a very persistent Channel 4 reporter that calls me, but I've never spoken to them. Who is that? I don't know her name. Is that Ben Tracy?
2 3 4 5 6 7	 Q Meals? A No. Q That all is on your own ticket? A Yes, yes. Q Request No. 18 requires that you produce names of individuals who have made contributions to the 	2 3 4 5 6 7	A Q A Q	Yes, there's a very persistent Channel 4 reporter that calls me, but I've never spoken to them. Who is that? I don't know her name. Is that Ben Tracy? No.
2 3 4 5 6 7 8	 Q Meals? A No. Q That all is on your own ticket? A Yes, yes. Q Request No. 18 requires that you produce names of individuals who have made contributions to the re-election of John Norquist. I believe you have 	2 3 4 5 6 7 8	A Q A Q	Yes, there's a very persistent Channel 4 reporter that calls me, but I've never spoken to them. Who is that? I don't know her name. Is that Ben Tracy? No. MR. FINERTY: Is it a man or a
2 3 4 5 6 7 8 9	 Q Meals? A No. Q That all is on your own ticket? A Yes, yes. Q Request No. 18 requires that you produce names of individuals who have made contributions to the re-election of John Norquist. I believe you have produced records pertaining to this request. Is 	2 3 4 5 6 7 8	A Q A Q	Yes, there's a very persistent Channel 4 reporter that calls me, but I've never spoken to them. Who is that? I don't know her name. Is that Ben Tracy? No. MR. FINERTY: Is it a man or a woman?
2 3 4 5 6 7 8 9	 Q Meals? A No. Q That all is on your own ticket? A Yes, yes. Q Request No. 18 requires that you produce names of individuals who have made contributions to the re-election of John Norquist. I believe you have produced records pertaining to this request. Is that correct? 	2 3 4 5 6 7 8 9	A Q A Q A	Yes, there's a very persistent Channel 4 reporter that calls me, but I've never spoken to them. Who is that? I don't know her name. Is that Ben Tracy? No. MR. FINERTY: Is it a man or a woman? THE WITNESS: Woman.
2 3 4 5 6 7 8 9	 Q Meals? A No. Q That all is on your own ticket? A Yes, yes. Q Request No. 18 requires that you produce names of individuals who have made contributions to the re-election of John Norquist. I believe you have produced records pertaining to this request. Is that correct? A Yes. 	2 3 4 5 6 7 8 9 10	A Q A Q A Q	Yes, there's a very persistent Channel 4 reporter that calls me, but I've never spoken to them. Who is that? I don't know her name. Is that Ben Tracy? No. MR. FINERTY: Is it a man or a woman? THE WITNESS: Woman. Channel what?
2 3 4 5 6 7 8 9 10	 Q Meals? A No. Q That all is on your own ticket? A Yes, yes. Q Request No. 18 requires that you produce names of individuals who have made contributions to the re-election of John Norquist. I believe you have produced records pertaining to this request. Is that correct? A Yes. Q Are there any records that you excluded that would 	2 3 4 5 6 7 8 9 10 11 12	A QAQA QA	Yes, there's a very persistent Channel 4 reporter that calls me, but I've never spoken to them. Who is that? I don't know her name. Is that Ben Tracy? No. MR. FINERTY: Is it a man or a woman? THE WITNESS: Woman. Channel what? 4.
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22 33 44 55 66 77 88 99 100 113 144 155 186 192 22 22 22 22 22 23	Q Meals? A No. Q That all is on your own ticket? A Yes, yes. Q Request No. 18 requires that you produce names of individuals who have made contributions to the re-election of John Norquist. I believe you have produced records pertaining to this request. Is that correct? A Yes. Q Are there any records that you excluded that would qualify under this particular request No. 18? A Not that I have in my possession. Q Other than you, who else would have copies of records from contributors? A As I said, the campaign's computer person. Q I think you did give me the name of that A Peter Turner. Q Peter Turner, all right. A The treasurer. Q Who is that? A Steve Jacobs at Reinhart, Boerner and the City	2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18 19 20 21 22 23	A QAQA QAQAQAQAQAQAQAQAQAQAQAQAQAQAQAQA	Yes, there's a very persistent Channel 4 reporter that calls me, but I've never spoken to them. Who is that? I don't know her name. Is that Ben Tracy? No. MR. FINERTY: Is it a man or a woman? THE WITNESS: Woman. Channel what? 4. Is that Ms. Melanie Stout? I believe so. You have never spoken to any journalist? No. Never been interviewed? I don't speak to journalists. Are you aware of any strategy sessions conducted by anyone, including the attorneys for the City, to deal with the Marilyn Figueroa complaint? No. Are you aware of any strategy meetings where
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Cas		Compress Deposition of BARBARA		Sheet 18
1		Mr. Fleming, Mr. Reimer or Jeff Gillis were present?	1	correct so I don't have to call all these
2	Α	In what time frame?	2	people or send my investigator. That would
3		At any time to the present.	3	help me tremendously.
4	-	I believe my husband was involved in December after	4	MR. SCHRIMPF: I would request that
5	$\overline{}$	•	5	
	^	the press conference.		when Ms. Candy does this she provide that list
6	•	He was involved in what?	6	rather than to Mr. Arellano, to her counsel,
7		A strategy session.	/	and that counsel simultaneously communicate
8	-	Do you know what was discussed?	8	the results of this search to Mr. Arellano and
9	Α	No, I do not.	9	myself.
10	Q	Did he ever tell you what the strategy was?	10	MR. ARELLANO: Well, I want a copy
11	Α	No, no.	11	of the list that she's going to put together.
12	0	And that was after the Mayor had opened up?	12	MR. FINERTY: I think he's saying
13	_	Yes, yes.	13	that she would give it to me and then I'd fax
14		Now, request No. 23, I would hope that you would	14	it to you and fax it to him at the same time.
15	~	save me a lot of work. Request No. 23 requires that	15	MR. SCHRIMPF: That's right.
16		you provide a list of names of individuals who	16	That's precisely right.
17		discussed, inquired, made statements and/or	17	MR. ARELLANO: That's not exactly
18			18	what he says, but I like your approach. He
		questioned Mayor John Norquist about his alleged	19	• • • • • • • • • • • • • • • • • • • •
19		relationship with Marilyn Figueroa prior to the last		wanted you to convey us over the way it come
20		week of re-election in 2000. Do you have any	20	across. But I think we are in agreement.
21		information with respect to that?	21	MR. FINERTY: Yeah, I'm not going
22	·A	Let me be very sure I understand what you're asking	22	to get involved.
23		there.	23	MR. ARELLANO: See that's what you
24		It's request No. 23.	24	get.
25	Α	Right. Who directly addressed the Mayor?	25	MR. FINERTY: I'll be the mailman.
		215		217
			1	
1	0	Correct.	1	If she can recollect. I don't know if her
1 2	-	Correct.	1 2	If she can recollect. I don't know if her recollection will be refreshed or not.
2	A	No, no.	2	recollection will be refreshed or not.
2 3	A	No, no. Now, what I would like you to do is tell me within	2 3	recollection will be refreshed or not. MR. ARELLANO: All right.
2 3 4	A	No, no. Now, what I would like you to do is tell me within 10 days after looking at the list of people to see	3 4	recollection will be refreshed or not. MR. ARELLANO: All right. Q Again yesterday looking at request No. 24, yesterday
2 3 4 5	A	No, no. Now, what I would like you to do is tell me within 10 days after looking at the list of people to see if you can identify those individuals who may have	2 3 4 5	recollection will be refreshed or not. MR. ARELLANO: All right. Q Again yesterday looking at request No. 24, yesterday I asked you whether or not you knew of anyone that
2 3 4 5 6	A Q	No, no. Now, what I would like you to do is tell me within 10 days after looking at the list of people to see if you can identify those individuals who may have questioned you on the rumors before the re-election.	2 3 4 5 6	recollection will be refreshed or not. MR. ARELLANO: All right. Q Again yesterday looking at request No. 24, yesterday I asked you whether or not you knew of anyone that may have information regarding John Norquist's
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2 3 4 5 6 7 8 9 10 11 12 13 14 15 16	A Q A Q A	No, no. Now, what I would like you to do is tell me within 10 days after looking at the list of people to see if you can identify those individuals who may have questioned you on the rumors before the re-election. Right. So I don't have to call them all; okay? But you asked me here if they questioned him; right? I would have no knowledge of that. Right. MR. FINERTY: You skipped back to 22 instead of 23. MR. ARELLANO: Right. I did. I already addressed that. And then I went into 23. All right?	2 3 4 5 6 7 8 9 10 11 12 13 14 15	recollection will be refreshed or not. MR. ARELLANO: All right. Q Again yesterday looking at request No. 24, yesterday I asked you whether or not you knew of anyone that may have information regarding John Norquist's alleged consensual relationship. And I believe you denied knowing anything A Right. Q with respect to this question? A Yes. Q And I'm talking about request No. 24; correct? A Right. Q Request No. 25 asks that you provide a list of names of any individuals who you believe may have any direct information from Marilyn Figueroa about the
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	-	se Compress Deposition of BARBARA			1: 1 : 1
ſ	1	Q Request No. 26 requests that you provide a list of	1	Q	Do you have any credit card receipts, vouchers of
١	2	dates in which agents of respondent City of	2		any kind involving John Norquist?
- 1		Milwaukee, including John Norquist, held any type of	3	Α	No.
	3	Willwaukee, including joint Wordulet, field any type of	4		When he incurs expenses in a political campaign,
	4	meeting, any type of discussion of any kind related		V	does he get reimbursements?
'	5	to the alleged sexual relationship with	5		*
١	6	Marilyn Figueroa prior to October 11th, 2000. The	6		No.
- [7	dates alleged herein include but shall not be	7	Q	So as far as expenses for and on behalf of the
1	8	limited to discussions with the following	8		political campaign organization, what types of
	9	individuals: Fund raising staff, campaign staff,	9		expenses would be reimbursable, if any?
		election campaign manager Christofferson. Do you	10	Α	We don't. I mean we don't have planning dinners and
	10	election campaign manager christonerson. Do you	11	• •	things like that.
	11	have any information that would respond to this	12	Λ	Nothing?
- 1	12	request No. 26?			
1	13	A No.	13	А	No, no. If somebody like buys a thousand stamps,
	14	Q Let me ask you to clarify that answer for me.	14		they're reimbursed for that.
	15	A Okay.	15	Q	But gas, mileage, none of that is not reimbursable?
	16	Q You certainly have information that	16	Α	No.
	17	Bill Christofferson knew about these exchanges	17	0	Dinners with a potential contributor?
		between Marilyn Figueroa and Mr. Norquist; correct?	18	_	No.
	18		19		No? Do you receive any type of mail on behalf of
	19	A Correct.	20	V	the Mayor?
	20	Q But you're not able to tell me when he learned of		٨	
	21	these exchanges?	21		Well, responses to fund raising.
	22	A That's right.	22	-	Just fund raising?
	23	Q Did you ever ask him when he knew, when he learned	23		Yes.
	24	about these facts? Did you ever ask him that?	24	Q	You never receive like credit card statements,
	25	A He's told me in just very vague terms.	25		bills?
		219			221
	1	O. What did ha tall you?	1	Α	No
)	1	Q What did he tell you?	1		No. Receipts?
	2	A I would say before the election is what he said.	2	Q	Receipts?
)	2	A I would say before the election is what he said. Q When you have strike that. Since this	2	Q A	Receipts? No. We don't have credit cards.
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١	1	second.	1	you know, a person who is under security. You
ı		A Wait. These are	2	may not want to know it either because if he
	3	MR. SCHRIMPF: Let me indicate	3	gets a nasty phone call at night, they'll be
	4	that	4	over to question you.
	5	MR. FINERTY: You may have a	5	MR. ARELLANO: Well, first of all,
	6	security I don't know if he has an unlisted	6	if she does not I suspect well, first of
	7	number or not.	7	all, you don't have any standing to direct
	8	THE WITNESS: Yes, he does.	8	this witness not to answer. I am sensitive
ł	9	MR. SCHRIMPF: Yes.	9	and I think you do have some basis, although
	10	MR. FINERTY: And I don't want to	10	this is not a privacy issue because she's
	11	create any problem that might jeopardize. The	11	not
	12	man is a public official and he's under a	12	MR. FINERTY: I'm not raising a
	13	24-hour-a-day security.	13	privacy issue. That's not our concern.
	14	MR. ARELLANO: Well, let me hear	14	MR. ARELLANO: Here's what I
	15	what counsel has to say.	15	suggest. And for the judge's understanding of
	16	MR. FINERTY: Sure, I'm thinking	16	my position, as to the issue of relevance, the
	17	out loud. Because I don't want to let her	17	issue of phone calls is before the court. As
	18	answer	18	to where the phone calls come from is about as
	19	MR. ARELLANO: But let's go back to	19	relevant as the rest of the claims because
	20	the proper structure.	20	this is a claim of harassment in many forms.
	21	MR. SCHRIMPF: I am interposing an	21	If this witness is being directed not to
	22	objection. First of all, I don't think it's	22	answer, then I will then file my motion to
12	23	likely to lead to relevant or discoverable	23	compel pursuant to my notice of deposition.
12	24	evidence. But on top of that, there are	24	So if that is exactly what is happening, I
12	25	overriding security concerns and privacy	25	will honor your attorney's request to discuss
ı		223		225
Ţ	1	concerns.	1	it some more and probably next week you tell
•			1 2	it some more and probably next week you tell me what your position is.
	1 2 3	concerns. MR. ARELLANO: Okay, your objection is noted.	i .	
	2	MR. ARELLANO: Okay, your objection	2	me what your position is.
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	Case Com			
1	1	do you guys know his number? It's an unlisted	1	the very limited time that we have as you know
	2	number.	2	and the large number of witnesses that we
	3	THE WITNESS: I haven't called in	3	still have to depose. It is my experience
	4 .	so long I don't even know if I even have the	4	that you have to do your discovery as soon as
)	5	number.	5	possible.
	6	MR. FINERTY: The last number she	6	MR. SCHRIMPF: Frankly, I think
	7	has will be provided. And I'm not trying to	7	Mr. Finerty's suggestion is a good one.
1	8	be obstructionist. I just really don't think	8	MR. ARELLANO: And I think so.
	9	that, you know, a contract employee of the	9	He's been very enlightening. But if not, if I
	10	campaign ought to be giving out that type of	10	don't hear from you as to the position of the
	11	information. He has two children and a wife	11	respondent, because even if he takes a
	12	are at the same number. But I think it is	12	position, you folks still have to take a
	13	relevant and I think you're entitled to ask	13	position, if I don't hear from you by 4:30 on
	14	for that but	14	Monday, I will file my motion to compel.
	15	MR. ARELLANO: Let me ask you,	15	MR. FINERTY: Before we leave today
ĺ	16	counsel, for the respondent	16	she will write the number on three pieces of
i	17	MR. SCHRIMPF: Let me just point	17	my stationery. We'll put them in three
	18	out that we can raise this with the	18	envelopes and we'll tape it shut. You'll take
	19	administrative law judge as we have a meeting	19	two. You'll take one. And then we're
	20	scheduled for Monday.	20	finished with that aspect of this.
ļ	21	MR. ARELLANO: Yes, except that,	21	MR. ARELLANO: Very good, very
	22	just so you understand, it is my practice to	22	good. And just for your information, counsel,
	23	protect my record regardless of what the judge	23	it is my position as an officer of the court
	24	decides. And I want to make sure that	24	that I don't disclose these things.
	25	everything is properly before him in proper	25	Mr. Tokus, would you like to step out if
		227		229
	1	(1 11 there ever be an appeal in this	1	my discussions are creating such inconvenience
	1	form should there ever be all appeal in this	1 1	my discussions are creating such inconvenience
		form should there ever be an appeal in this case. As Judge Shabaz usually says, if this	2	for you?
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	ase compless Deposition of BARBAR	711.	CANDY (VOL. II) 2/1/UZ Sheet 22
1	A 224	1	A That's well, the campaign had a phone number. I
2	Q Hold I'm, I'm sorry, I kept writing 608. (414)224	2	don't know what it was.
3		3	Q What number was that?
4	A 9336, and 224-1626.	4	A I don't remember. I never called it actually.
5	Q 224-1626?	5	Q Is there an office for the political campaign?
6	A Yes.	6	A Well, it closed after the election.
7	Q Do you know, given the number of years that you hav		
8	known the Mayor, if he has ever changed his business	E .	Q What's the address?
9	office number?	8	A It was on South Second, I don't know. 126 South
		9	Second, I believe.
10	A No. This number came later.	10	1 1
11	Q Okay, the last	11	
12	A We added a line.	12	
13	Q The 1626?	13	, , , , , , , , , , , , , , , , , , , ,
14	A Yes.	14	John Fuchs?
15	Q To your knowledge, does the political campaign	15	A No.
16	organization use any of these numbers in particular?	16	Q What about Attorney Lester Pines?
17	A I'm sorry?	17	
18	Q Yes. My question is do you know if any of these two	18	Q I think you answered that question yesterday.
19	numbers is used primarily for political reasons?	19	
20	A Yes, that	20	
21	Q Which number, the 1626?	21	
22	A Both of them are.	22	
23	Q Mayor Norquist's cellular telephone number?	23	, , , , , , , , , , , , , , , , , , , ,
24	A I don't know if he has a cell phone.	24	
25	Q You have never spoken to him through a cellular	25	
120	231	23	, , ,
L	201		233
1	phone number?	1	A No.
2	A I've spoken to him on a cell phone, but I just	2	Q Any records pertaining to Attorney Pedro Colon?
3			A No.
3 4	assumed they were the body guards' cell phone.	3	A No.
4		3 4	A No. Q Have you ever served as a campaign manager for
4 5	assumed they were the body guards' cell phone. Q Do you know what his fax number is? A Where?	3 4 5	A No.Q Have you ever served as a campaign manager for Pedro Colon?
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Ca.	se Compress Deposition of BARBARA		
1	Q Do you have any knowledge as to whether or not	1	MR. FINERTY: M-U-D-D.
2	Mr. Murphy receives any financial compensation from	2	MR. ARELLANO: Very good. And I
3	Mr. Norquist or anyone who supports Mr. Norquist?	3	think I have also put on the record some of
4	A You're going to have to be more explicit, I'm not	4	the things that I will be expecting from this
5	Q Yes. My question is do you know whether or not	5	witness unless counsel can provide me with a
6	Mr. Murphy has ever received any funds from	6	different response. And I included requests
7	Mr. Norquist or his campaign	7	for email communications, the type of Internet
8	A Definitely not, no.	8	service provider at home or at work, and I
9	Q organization?	9	will also include Mr. Chuck Pruitt.
10	A No.	10	MR. SCHRIMPF: P-R?
111	Q You read articles?	11	MR. ARELLANO: P-R-U-I-T-T. With
12	A Skimmed it.	12	all due respect, counsel, sometimes I can't
13	Q Published by Mr. Murphy?	13	wait too long because somebody may say they
14	A Skimmed the Internet, yeah.	14	are not available in a month. I will
15	Q Do you take a position with respect to the articles	15	immediately serve them if I don't hear from
		16	you. And the reason is because I'm running
16	that you read published by Mr. Murphy?	17	very, very, very short. And short has always
17	A No.	18	been a problem for me.
18	Q Are you referring to an article that he published on the Internet?	19	That's all I have for you subject to
19		20	possibly recalling you if for some reason we
20	A Yes.	21	
21	Q Do you have a laptop computer?		develop information or need to bring you back.
22	A No. Yes, actually I do.	22	But we will not bring you back to ask you the
23	Q Do you have more than one computer?	23	same questions. Is that okay? Thank you very
24	A Yes.	24	much for coming.
25	Q How many computers do you have?	25	MR. FINERTY: Let's not go off the
	235		237
1	A Two.	1	record. Let's talk about several things and
2	Q Do you know or have you ever heard any campaign	2	how she is going to respond and you can take
3	staff, I'm talking about John Norquist's campaign	3	up any issues you have with the City folk.
4	organization, who may express opinions on who to	4	MR. SCHRIMPF: Thank you.
5	believe regarding John Norquist and/or	5	MR. FINERTY: You've probably got a
6	Marilyn Figueroa disputes?	6	lot of issues. I don't know if you want to
7	A No.	7	take them all up today, but I don't have to be
8	MR. ARELLANO: Counsel, let me give	8	here. You have asked her to review I believe
9	you the names of some individuals that I will	9	it's the two exhibits that contain a list of
10	be served, that will be served with a	10	
144		1 10	Mayor's club members and major donors.
11	,	111	Mayor's club members and major donors. MR. ARELLANO: Correct.
112	subpoena, at least the immediate future: Mr. Michal Dawson. What's the name of this	1	
	subpoena, at least the immediate future: Mr. Michal Dawson. What's the name of this	11	MR. ARELLANO: Correct.
12	subpoena, at least the immediate future:	11 12	MR. ARELLANO: Correct. MR. FINERTY: And see if that
12 13	subpoena, at least the immediate future: Mr. Michal Dawson. What's the name of this Michelle from the campaign?	11 12 13	MR. ARELLANO: Correct. MR. FINERTY: And see if that refreshes her recollection, she will then
12 13 14	subpoena, at least the immediate future: Mr. Michal Dawson. What's the name of this Michelle from the campaign? THE WITNESS: McGrorty.	11 12 13 14	MR. ARELLANO: Correct. MR. FINERTY: And see if that refreshes her recollection, she will then write down any names she believes commented or
12 13 14 15	subpoena, at least the immediate future: Mr. Michal Dawson. What's the name of this Michelle from the campaign? THE WITNESS: McGrorty. MR. SCHRIMPF: How do you spell	11 12 13 14 15	MR. ARELLANO: Correct. MR. FINERTY: And see if that refreshes her recollection, she will then write down any names she believes commented or asked her about any of the rumors. She'll
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	Deposition of BANDANA		Silect 24
1	John Norquist, Mrs. Norquist and Marge Beil.	1	Marilyn flowers?
2	And then you amended that to state you would	2	A No.
3	like all emails regardless of the time period	3	Q Did you ever notice Marilyn being a little stressed
4	to or from Bill Christofferson unless it is	4	out or uneasy whenever the Mayor was around?
5	something because Mr. Christofferson is a	5	A No.
6	campaign consultant and they and I believe	6	MR. ARELLANO: That's all I have.
7	are working on at least two campaigns. That's	7	·
8	Attorney General James Doyle and State Senator	8	MR. FINERTY: Okay. So what we'll
9	Kevin Shilbilski.		do is when she has those documents again
10		9	I'm going to be unavailable all next week. If
	MR. ARELLANO: Yes. I'm not	10	you're going to need them sooner than that, I
11	interested in any of that.	11	can have one of the other attorneys in my
12	MR. FINERTY: Unless they mention	12	office collect the information and then
13	either Marilyn Figueroa or John Norquist or	13	overnight them to me. I'll look at them and
14	this litigation.	14	I'll make arrangements unless you can wait
15	MR. ARELLANO: Correct. Or anyone	15	till a week from Monday.
16	else in connection with John Norquist.	16	MR. ARELLANO: When are you coming
17	MR. FINERTY: Just kind of a broad	17	back?
18	brush. It refers to anybody involved in this	18	MR. FINERTY: A week from Monday.
19	litigation, and it's about the litigation and	19	I'll be in the office a week from Monday. I'm
20	she has it, I don't know if there's going to	20	coming back a week from Sunday night.
21	be a large number of documents that fall into	21	MS. GARCIA: So that would be the
22	that category.	22	10th?
23	THE WITNESS: Can you be very clear	23	MR. FINERTY: I think so.
24	with me about that?	24	MR. ARELLANO: I prefer to wait
25	MR. FINERTY: Sure. What do you	25	until you come back if that is
	239		241
<u> </u>			
1 4			
1	need to clarify while he's here?	1	MR. FINERTY: Okay. I'll deal with
2	THE WITNESS: I need what he's	2	it on the 10th, and you'll probably have it on
2 3	THE WITNESS: I need what he's asking for.	2 3	it on the 10th, and you'll probably have it on the 11th. And what I'll do on those documents
2 3 4	THE WITNESS: I need what he's asking for. MR. ARELLANO: He'll give you a	2 3 4	it on the 10th, and you'll probably have it on the 11th. And what I'll do on those documents is I'll make sets of copies. And if I fax
2 3 4 5	THE WITNESS: I need what he's asking for. MR. ARELLANO: He'll give you a list. I concur with	2 3 4 5	it on the 10th, and you'll probably have it on the 11th. And what I'll do on those documents
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	Case Compi	ress Deposition of BARBARA	R. CA	
[1	THE WITNESS: As I last knew it?	1	records that Barbara produced.
١	2	MR. FINERTY: As she last knew it.	2	MR. ARELLANO: Here's the problem.
1	3	I mean, this may have changed. I don't know.	3	I would have some objection in returning all
		We have no way of knowing that. She'll write	4	of the originals to your client because those
	5	the number, area code, number down in your	5	originals I want them intact until the day of
	6	presence. I'll put it in the envelope. I'll	6	the trial. She can get a copy.
	7	put a piece of Scotch tape over it, I'll	7	MR. FINERTY: I told you at the
		initial it, I'll stamp it with my stamp, I'll	8	beginning of this if you were going to do
	8		9	this, make copies now, and I told you I would
	9	get a seal. Do you want to see my	10	go over to my office and make the copies with
	10	impersonation of a corporate seal?	11	you or Cheri Garcia present just for this
ļ	11	(Indicating) And then what I'll do is I'll	12	reason.
	12	give you two copies, give you one copy and	13	MR. ARELLANO: That's fine. That's
	13	we're out of here.	1	i
	14	MR. ARELLANO: Let me just clarify	14	fine.
	15	this confidentiality agreement, okay? It is	15	MR. SCHRIMPF: Okay. Still on the
	16	my intention to request printouts of all these	16	record
	17	telephone numbers. If somewhere along the way	17	MR. ARELLANO: Just so you
	18	they get released to the telephone company,	18	understand that Mrs. Garcia does not make
	19	that obviously is not my problem. And I am	19	copies. I've given you plenty of hints.
	20	not, I am not stipulating that I will not make	20	MR. FINERTY: I said she can come
	21	a request for those records.	21	with me and watch.
i	22	MR. FINERTY: To the phone company?	22	MR. ARELLANO: Oh, that's
	23 .	MR. ARELLANO: That's correct.	23	different.
	24	MR. FINERTY: That's not I mean	24	MR. SCHRIMPF: We're on the record?
	25	they're going to have their own problems	25	MR. SCHRIMPF: I assume, counsel,
		243		245
	1	coughing that up, you know, particularly if	1	you're done?
	2	it's an unlisted number. And I can tell you	2	MR. ARELLANO: Yes.
	3	from past experience they have every public	3	
	4	official in town flagged. And when you	4	EXAMINATION
	5	subpoena that, the local police will be	5	By Mr. Schrimpf:
	6	notified somebody's looking for it. I mean	6	O Ms. Candy, are you going to be present for the
	7	even if you, you know, try to subpoena the	7	hearing in this matter which is presently scheduled
	8	records of the Mayor of Cudahy, the Cudahy	8	to begin on May the 6th of this year and will
	9	police would know in probably two or three	9	probably continue for most of the month? You
	10	hours or so.	10	obviously wouldn't have to be available for all
	11	If this is agreeable to you, we'll do	11	those days, but are you going to be available, or do
	12	this and	12	you have plans on leaving the country or being
	13	MR. SCHRIMPF: That sounds good.	13	otherwise unavailable
	14	MR. SCHRIMPF: And I have some	14	A No.
	15		15	Q during the month of May?
	16	questions. MR. ARELLANO: You want to be on	16	A No.
	17	the record? I mean we've been putting things	17	MR. SCHRIMPF: Counsel, do you
	18	on the record. Is there anything specifically	18	intend to use any part of this deposition,
			19	either the videotape or the transcripts in
	19	that you want on the record? I am done.	20	lieu of the actual testimony of the witness?
	20	MR. FINERTY: Well, I don't need it	21	MR. ARELLANO: For potential
	21	on, but I do want an understanding with	22	
	22	respect to the exhibits. The reporter with	4	impeachment purposes, refresh recollection
	23	our agreement is going to take the exhibits	23	and/or if for some reason due to some,
	24	and make copies and she is going to return at	24	hopefully not, some unknown reason she cannot
	25	the earliest possible moment all of the	25	be present.
		244	1	246

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MR. SCHRIMPF: But as of the
2
              present time you do intend to be here and
3
              available, Ms. Candy?
4
                      THE WITNESS: Yes.
5
                      MR. SCHRIMPF: Then that's all I
6
              have. Thank you.
8
9
                      (adjourning at 12:07 P.M.)
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                                   247
      STATE OF WISCONSIN )
2
      COUNTY OF DANE
3
        I, TAUNIA NORTHOUSE, a Registered Diplomate Reporter
      and Notary Public in and for the State of Wisconsin, do
5
6
      before me at the offices of Murphy, Gillick, Wicht &
7
8
      Avenue, City of Milwaukee, County of Milwaukee, and
9
      State of Wisconsin, on the 1st day of February 2001.
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23
                 Dated February 3, 2001.
24
25
                              Registered Diplomate Reporter
Notary Public, State of Wisconsin
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