

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

MARILYN FIGUEROA,

Complainant,

-vs-

CITY OF MILWAUKEE,

Respondent.

ERD Case No.  
CR200003454

Videotape Deposition of:

MARILYN FIGUEROA

(Volume II)

Madison, Wisconsin  
March 6, 2002

Reporter: Taunia Northouse, RDR, CRR

VOLUME II of VIDEOTAPE DEPOSITION of

MARILYN FIGUEROA, the Complainant, called as a witness, taken at the instance of the Respondent, under the provisions of Chapter 885. of the Wisconsin Statutes, pursuant to notice duces tecum, before Taunia Northouse, a Registered Diplomate Reporter and Notary Public in and for the State of Wisconsin, at the offices of Wisconsin Bar Association, 5302 Eastpark Boulevard, City of Madison, County of Dane, and State of Wisconsin, on the 6th day of March 2002, commencing at 9:13 in the forenoon.

A P P E A R A N C E S

VICTOR M. ARELLANO, JAMES A. CATES and JOHN C. CARLSON, JR., Attorneys, for LAWTON & CATES, S.C., Attorneys at Law, 10 East Doty Street, Madison, Wisconsin, appearing on behalf of the Complainant.

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

Also present: Barbara Teipner Wargolet and Cheri Garcia

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I N D E X

WITNESS

MARILYN FIGUEROA

Examination by Mr. Schrimpf

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Examination by Mr. Arellano

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E X H I B I T S

No. Description

Identified

5 Telephone bills

217

6 Photocopy of photograph of bracelet

232

(Attached to the original transcript and copies provided to counsel)

(Original transcript filed with Attorney Schrimpf)

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MARILYN FIGUEROA,

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

EXAMINATION

By Mr. Schrimpf:

Q Good morning, Ms. Figueroa.

A Good morning.

Q Between last night and this morning have you had an opportunity to review any documents of any kind for purposes of the continuation of your deposition?

A No, I haven't.

Q Prior to the commencement of the deposition yesterday, had you reviewed any documents?

A My complaint.

Q Your complaint. Which complaint, please?

A That I filed.

Q Well, the reason why I ask which complaint is because as I recollect, there was a complaint dated October the 11th and then there was another complaint that was dated November 27th and then there was a complaint dated December 4th and then there was a second amended complaint and a third amended complaint. Did you review all those documents?

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1 A No. Just my last complaint.  
 2 Q I'm sorry?  
 3 A My last complaint.  
 4 Q The third amended complaint is the document that you  
 5 reviewed?  
 6 A Yes.  
 7 Q Did you review any other documents in preparation  
 8 for your deposition?  
 9 A No.  
 10 Q For purposes of your deposition, was any chronology  
 11 prepared by anyone?  
 12 A No. I tried to but no.  
 13 MR. ARELLANO: Marilyn, just answer  
 14 the question.  
 15 THE WITNESS: Yes.  
 16 Q I have the following addresses for you and the  
 17 following dates that I have been able to develop  
 18 from other documents. And I'm just wondering if you  
 19 could tell me if this information is accurate or not  
 20 accurate. And if it's not accurate, if you could  
 21 tell me the correct information. Okay?  
 22 A Yes.  
 23 Q I show you for purposes of the time that you were  
 24 employed by the City of Milwaukee, and specifically  
 25 the Mayor's office, I show you living at 1129-A  
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1 South 22nd Street, Milwaukee, 53204?  
 2 A Yes.  
 3 Q As of May 11th, 1992. Is that --  
 4 A I don't recall the date, but I lived there, yes.  
 5 Q Well, if, for example, records of the Mayor's office  
 6 would indicate that these are the dates, would you  
 7 have any basis for disputing the dates?  
 8 A I guess I would only have to look at dates before I  
 9 can answer that of like bills and stuff.  
 10 Q You mean for utilities and that kind of thing?  
 11 A Yes, yes.  
 12 Q And I show you as living at 1230 South 26th  
 13 Street --  
 14 A Yes.  
 15 Q -- as of March 28th, 1993.  
 16 A Again, I can't -- I know that I lived there.  
 17 Q Okay.  
 18 A I don't remember the exact dates.  
 19 Q And I show you living at 912 South 19th Street,  
 20 Milwaukee, 53204 as of October 24th, 1994?  
 21 A '94?  
 22 Q Yes, ma'am. Well, October 24th of '94, fairly late  
 23 in the year.  
 24 A I don't recall. I know it was, the lease was up.  
 25 It was the option to own and I -- I'm sorry, I don't  
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1 remember the dates.  
 2 Q Do you remember who the owner of 912 South 19th  
 3 Street was?  
 4 A SCO, South Community Organization.  
 5 Q You mentioned that, thank you. And then I show you  
 6 resided once again at 1230 South 26th Street,  
 7 Milwaukee?  
 8 A Yes.  
 9 Q 53204?  
 10 A Yes.  
 11 Q As of October 23rd, 1995?  
 12 A Again, I -- I can't give you at this point direct  
 13 yes because I'm -- I don't recall the dates.  
 14 Q Then I show you living at 3118 West Fardale,  
 15 Apartment 5 as of April 1st, 1996.  
 16 A I think that's correct.  
 17 Q Do you still have a copy of the lease from  
 18 912 South 19th Street and 3118 West Fardale?  
 19 A No. But -- no.  
 20 MR. ARELLANO: There we go.  
 21 MR. SCHRIMPF: No coaching the  
 22 witness, counsel.  
 23 Q And then I show you as residing at 3149 South Pine  
 24 and you gave me the address of 3151.  
 25 A It's a small duplex that I used the whole house  
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1 because it's a small duplex, but it's the same  
 2 address.  
 3 Q Okay, Milwaukee 53207 as of roughly October 19th,  
 4 1998.  
 5 A No, I purchased the house in June of 1998.  
 6 Q In June of 1998. Do you know -- which part of the  
 7 house do you occupy at Pine? Is it the lower half  
 8 or the upper half?  
 9 A Both.  
 10 Q Does any part of your family live in one part to the  
 11 exclusion of the other part?  
 12 A No, no.  
 13 Q And you live at that address with your children?  
 14 A Yes.  
 15 Q And no one else lives at that address?  
 16 A No.  
 17 Q Either address, 3151 or 3149?  
 18 A My children.  
 19 Q Do you -- which is which? Is 3149 the upper?  
 20 A Yes.  
 21 Q And 3151 is the lower?  
 22 A Yes.  
 23 Q I asked you yesterday if you had been arrested for  
 24 anything, and you indicated that there had been an  
 25 arrest when there was the protest that took place?  
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1 A Yes.  
 2 Q And I think you said that was South Division High  
 3 School in the bilingual program?  
 4 A Yes, yes.  
 5 Q Were there any other arrests?  
 6 A Yes, there was.  
 7 Q And what were those other arrests please, ma'am?  
 8 A One was my -- before my ex-husband --  
 9 MR. ARELLANO: I'm going to object  
 10 on the grounds of relevance. Subject to that  
 11 objection, she can answer.  
 12 Q Subject to the objection, please answer the  
 13 question.  
 14 A My ex-husband, before he left our checks were with  
 15 both of our names on the checks. He purchased many  
 16 stuff and took the money out of the bank. And I was  
 17 driving and I didn't have the sticker on my car, and  
 18 so they stopped me for the sticker on my car. And  
 19 they had some ticket -- some -- one of the  
 20 creditors, or one of the people that he wrote a  
 21 check to I guess filed some sort of action against  
 22 us, but because he wasn't in town, I -- I was  
 23 responsible for it because of the marriage of him.  
 24 Q And was that in Milwaukee County?  
 25 A Yes.

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1 Q Do you remember when it was, a calendar date?  
 2 A No. It was at the Bob Dylan concert.  
 3 Q Any other arrests?  
 4 A No.  
 5 Q Were you ever for any reason removed from any  
 6 taverns or restaurants --  
 7 A No.  
 8 Q -- by the police?  
 9 MR. ARELLANO: Same objection.  
 10 Q Subject to the objection, by the police?  
 11 A No.  
 12 Q And have you covered all of the arrests --  
 13 A Yes.  
 14 Q -- that have occurred to you? Were you ultimately  
 15 fined in any of those arrests? Did you have to pay  
 16 a fine?  
 17 MR. ARELLANO: Same objection.  
 18 Q Subject to the objection.  
 19 A I had to pay the check that my ex-husband has  
 20 written, that he wrote, yes.  
 21 Q Who is Gerald Jones?  
 22 A He's the owner of the different, WAOV Radio Station.  
 23 He has a contract with Potawatomi Bingo. He has  
 24 several newspapers.  
 25 Q When you gave the interview to Milwaukee Magazine,

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1 Q Do you remember when it was?  
 2 A It was during the time that I worked at  
 3 16th Community Health Center.  
 4 Q And do you remember what year that was?  
 5 A It was before the 1990 census because I worked there  
 6 afterwards.  
 7 Q But it was after you came back from San Diego to  
 8 Milwaukee?  
 9 A Yes.  
 10 Q Were there any other arrests?  
 11 A When I was younger, yes.  
 12 Q And what were those?  
 13 A One was we had a group of kids that went to --  
 14 MR. ARELLANO: Subject to my  
 15 previous objection.  
 16 Q Please continue.  
 17 A A concert, Bob Dylan concert, and there was a  
 18 question that there was marijuana in our row.  
 19 Q And what theater was this in?  
 20 A I don't remember.  
 21 Q Was it downtown Milwaukee?  
 22 A It was Milwaukee, yes.  
 23 Q Were you over the age of 18 at the time of this  
 24 arrest?  
 25 A Yes.

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1 did you have any notes with you?  
 2 A No.  
 3 Q Did you have any documents with you that you used  
 4 for purposes of refreshing your recollection of  
 5 events during the course of the interview?  
 6 A No.  
 7 Q Did you study any notes prior to the interview that  
 8 you did not have with you at the interview?  
 9 A No.  
 10 Q Were there any other documents you studied in  
 11 preparation for the interview that you did not  
 12 actually have with you at the interview?  
 13 A No. I don't recall any.  
 14 Q You don't recall any? Had there been some, would  
 15 you recall it?  
 16 A I would think so, yes.  
 17 Q Was the reporter given any documents with respect to  
 18 that interview either by you or by your attorney?  
 19 A What kind of documents?  
 20 Q Any documents at all, anything that was on a piece  
 21 of paper in writing.  
 22 A No.  
 23 Q Were any pictures given by you or your attorney to  
 24 the writer of the article or the interviewer?  
 25 A No.

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1 Q I'm sorry?  
 2 A No.  
 3 Q Since yesterday have you been able to think of any  
 4 more episodes of where you claim the Mayor of the  
 5 City of Milwaukee was requesting sexual favors in  
 6 exchange for favorable consideration of block grant  
 7 proposals?  
 8 A I didn't --  
 9 Q You did not think of any more?  
 10 A I didn't think of any.  
 11 Q When you left the Mayor's office, do you know who  
 12 picked up your items from your office area and your  
 13 desk?  
 14 A I understand that Mike Soika and some other people  
 15 went straight to my office and took everything out  
 16 of my office.  
 17 Q Who were those other people?  
 18 A I think probably Ruth and clerical staff.  
 19 Q Well, are you speculating or do you know that?  
 20 A I received a call from one of the staff persons that  
 21 they went through my desk.  
 22 Q And who was the staff person that you received a  
 23 call from?  
 24 A Michael Miller.  
 25 Q Michael Miller? Did you receive a staff, a call

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1 from any other staff person?  
 2 A Kimberly Pratt.  
 3 Q Any other staff person?  
 4 A No.  
 5 Q Have you ever seen any of the items that were in  
 6 your office again after your departure from  
 7 employment?  
 8 A No.  
 9 Q Do you know where any of those items are today?  
 10 A I found out through Ruth's deposition that they have  
 11 them locked up somewhere.  
 12 Q And that would be the only basis of your knowing  
 13 about anything?  
 14 A Yes.  
 15 Q Did the Mayor ever give you a book that was in  
 16 celebration of the 150th anniversary of the City of  
 17 Milwaukee?  
 18 A Yes, he gave everyone one in the office.  
 19 Q Do you know where that book is today?  
 20 MR. ARELLANO: The book that Mayor  
 21 gave to Marilyn Figueroa?  
 22 MR. SCHRIMPF: Yes; that book.  
 23 A I think we have it.  
 24 Q You have it?  
 25 A Uh-huh.

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1 Q Your attorney has it?  
 2 A Yes.  
 3 MR. ARELLANO: Well, hold on a  
 4 second. Let me take a second with my client  
 5 to clarify a couple things.  
 6 (Recess)  
 7 A The book?  
 8 Q Okay. We're back on the record. Yes, ma'am.  
 9 A I found out that when they went through all my, they  
 10 took a big bin and threw all a bunch of stuff away  
 11 of mine and kept some stuff. And one of the stuff  
 12 that they threw away was the book. And I found out  
 13 that someone sent it to my attorney.  
 14 Q Did you find that out just now during the  
 15 conference, or did you know that before?  
 16 A I knew that before.  
 17 Q And --  
 18 A And it was anonymous. Someone sent it anonymous.  
 19 Q And do you know who that anonymous person was?  
 20 A No.  
 21 Q Do you have any --  
 22 MR. ARELLANO: Sorry, counsel.  
 23 MR. OLSON: I don't think that was  
 24 a silly question. I would have asked the same  
 25 question.

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1 MR. SCHRIMPF: I appreciate that,  
 2 Mr. Olson.  
 3 MR. ARELLANO: I'm sorry, counsel.  
 4 No offense. I was going to direct her not to  
 5 answer that.  
 6 Q Do you have any reason for believing who the  
 7 anonymous person is?  
 8 A No.  
 9 Q How do you know that the book had been thrown out?  
 10 A Because they went through, from what Michael Miller  
 11 and Kimberly told me, is they went through all my  
 12 stuff and just threw everything out and that book  
 13 was in my office.  
 14 Q Were there any other items that were thrown out that  
 15 you have since retrieved?  
 16 A Not that I recall.  
 17 Q Not that you recall?  
 18 A No.  
 19 Q But you know that the book had been thrown out and  
 20 retrieved?  
 21 A Yes.  
 22 Q And then sent by someone anonymously to  
 23 Mr. Arellano?  
 24 A Yes.  
 25 Q As I understand it, Mr. Arellano was not your first

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1 attorney in this matter?  
 2 A Yes.  
 3 Q He was your third attorney?  
 4 A Yes.  
 5 Q When was Mr. Arellano retained by you?  
 6 MR. ARELLANO: Well, go ahead. If  
 7 you know.  
 8 A I don't remember.  
 9 Q If I ask you various months, will that help you?  
 10 A It was after I found out through the media that  
 11 John Fuchs said that he wasn't my attorney, after I  
 12 filed --  
 13 MR. ARELLANO: Well, hold on a  
 14 second. I'm going to object and I'm going to  
 15 direct her not to answer with respect to any  
 16 communications she may have had with any of  
 17 her previous attorneys or her current  
 18 attorney.  
 19 Q So that we're understanding, Ms. Figueroa, I don't  
 20 want you to tell me about things you told your  
 21 attorney. I want to know when you retained  
 22 Mr. Arellano, if you know.  
 23 MR. ARELLANO: That's the question.  
 24 A I don't remember.  
 25 Q You don't remember. Was it after April of 2000?

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1 A Yes.  
 2 Q Was it after May of 2000?  
 3 A I don't recall.  
 4 Q Was it after June of 2000?  
 5 A I don't recall. I know it was after I filed my  
 6 claim.  
 7 Q And if you filed, are you referring to the document  
 8 filed with EEOC on October the 11th of 2000?  
 9 A Yes.  
 10 Q And so you retained Mr. Arellano after October 11th  
 11 of 2000?  
 12 A Yes.  
 13 Q How would the anonymous person know to send it to  
 14 Mr. Arellano?  
 15 MR. ARELLANO: I want to object.  
 16 It calls for speculation.  
 17 MR. SCHRIMPF: Well, if she knows.  
 18 Maybe she knows.  
 19 A I really don't know.  
 20 Q The magazine article, and when I say magazine  
 21 article I'm referring to the interview that you gave  
 22 to Milwaukee Magazine --  
 23 A Yes.  
 24 Q -- indicates that you wrote things out for Mr. Fuchs  
 25 in order to explain to him what had happened to you.

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1 Do you remember telling the reporter that?  
 2 A Yes.  
 3 Q And where is that document today?  
 4 A I think Mr. Fuchs has it.  
 5 Q Do you know if Mr. Fuchs ever gave that document to  
 6 Mr. Arellano?  
 7 A I think so.  
 8 Q When you wrote that document out, did you have any  
 9 help writing that document out?  
 10 A No.  
 11 Q When was that document written?  
 12 MR. ARELLANO: Which document are  
 13 we talking about?  
 14 MR. SCHRIMPF: The document she  
 15 references in the article that she wrote out  
 16 for Mr. Fuchs.  
 17 MR. ARELLANO: Well, which  
 18 document?  
 19 MR. SCHRIMPF: Off the record for a  
 20 second.  
 21 (Discussion off the record)  
 22 Q At page 100 of the article written as a result of  
 23 the interview you gave, the following appears.  
 24 A Can I see it?  
 25 Q The following appears. I'm about to read what the

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1 article says.  
 2 MR. ARELLANO: And then you can see  
 3 it.  
 4 MR. SCHRIMPF: Right.  
 5 THE WITNESS: Okay.  
 6 Q Column 1, "Fuchs pressed Marilyn for details about  
 7 the sexual relationship but she cried  
 8 uncontrollably. She had never been able to discuss  
 9 them. Finally when Marilyn couldn't get the words  
 10 out, Fuchs asked her to put it in writing."  
 11 I've put a bracket. Let the record reflect  
 12 I'm showing the witness the article.  
 13 I put a bracket on the part that I read.  
 14 A Yes.  
 15 Q The document I'm referring to is the document where  
 16 you put things in writing.  
 17 A Yes.  
 18 Q Where is that today?  
 19 A I would think it was in Fuchs' office and in my  
 20 attorney's office.  
 21 Q Oh. Is that to say you don't know if Mr. Fuchs has  
 22 it or Mr. Arellano has it?  
 23 MR. ARELLANO: Objection,  
 24 mischaracterizes her prior testimony. And the  
 25 question has been asked and answered if you

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1 are attempting to repeat that.  
 2 Q When did you write this document?  
 3 MR. ARELLANO: And I'm going to  
 4 pose an objection pursuant to the  
 5 attorney-client privilege if the document was  
 6 requested by her previous counsel, Mr. Fuchs.  
 7 MR. SCHRIMPF: I'm merely asking  
 8 when it was written.  
 9 A It was many times that I went in to see --  
 10 MR. ARELLANO: Just he wants to  
 11 know when it was written.  
 12 A After -- I don't know the exact dates, but it was  
 13 after I seen Mr. Fuchs a couple times.  
 14 Q Okay.  
 15 A Several times.  
 16 Q And you don't know where the document is today?  
 17 MR. ARELLANO: Objection, asked and  
 18 answered.  
 19 Q Subject to the objection.  
 20 A No.  
 21 MR. SCHRIMPF: Could I have the  
 22 article back, please? Thank you.  
 23 Q Whether or not you were arrested, were there ever  
 24 episodes when the police removed you from your home  
 25 for any reason?

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1 A No.  
 2 Q Were there any episodes when the police removed you  
 3 from any restaurant or bar for any reason?  
 4 MR. ARELLANO: Objection, asked and  
 5 answered.  
 6 A No.  
 7 Q No, I didn't ask it right. When you were arrested  
 8 and the times you indicated to me, what were the  
 9 charges, if any, that were brought?  
 10 A One is about the check that my ex-husband wrote.  
 11 Q So that was like a bad checks charge or something?  
 12 A Yes. One was the protest of the kids.  
 13 Q So was that like a disorderly conduct charge --  
 14 A Yes.  
 15 Q -- or some such thing? All right. And what was the  
 16 other one?  
 17 A And the other one was the, in our row of people that  
 18 went to the Bob Dylan conference, someone was  
 19 smoking a marijuana.  
 20 Q Well, did the police find marijuana on you?  
 21 A No.  
 22 Q But you were arrested?  
 23 A Yes.  
 24 Q Do you know what the citation or charge was?  
 25 A I don't remember. I know they dropped it.

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1 Q It was dropped?  
 2 A Yes.  
 3 Q As to the document referenced in the article at  
 4 page 100, do you know where that document is today?  
 5 MR. ARELLANO: Objection, asked and  
 6 answered three times now.  
 7 A No, I don't.  
 8 Q Now, when we left off yesterday, as I read through  
 9 the transcript last night, I believe you were  
 10 describing the third episode of having sex with the  
 11 Mayor and that was at the apartment on Fardale after  
 12 having described two previous episodes of sex with  
 13 the Mayor and one episode where the Mayor came to  
 14 your house and you were hidden in the basement I  
 15 believe it was or in the bathroom, one of the two,  
 16 and another episode where Ms. Dawson rapped at your  
 17 door and you went out to the car. Do you recall  
 18 those?  
 19 A Yes, those weren't the sexual -- okay, yes.  
 20 Q At the time --  
 21 THE WITNESS: I'm sorry.  
 22 MR. ARELLANO: You're on candid  
 23 camera, so don't frown so much.  
 24 Q At the time that you were -- did you go from your  
 25 home to the car the day that Mike Dawson rapped at

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1 your door?  
 2 A Yes.  
 3 Q What did the Mayor talk to you about when you got to  
 4 the car?  
 5 A Stuff that didn't make sense, stuff --  
 6 Q Do you have any recollection of it at all?  
 7 A All I recollect is that there was no reason for them  
 8 to knock on my door.  
 9 Q The Mayor showed up at your house?  
 10 A He was outside.  
 11 Q But he stayed in the car?  
 12 A Yes.  
 13 Q Was the car being driven by one of his drivers?  
 14 A Yes.  
 15 Q And Mike Dawson was in the car?  
 16 A Yeah. She was staffing him that evening.  
 17 Q And what time of day was this?  
 18 A Must have been early evening because they were  
 19 apparently done for some time.  
 20 Q And whatever conversation you had with the Mayor was  
 21 in the car with at least the driver being present?  
 22 A Yes, and Mike Dawson was sitting in the back seat.  
 23 Q And you have no independent recollection of what the  
 24 substance of the conversation was?  
 25 A All I remember is walking back upstairs wondering

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1	why he stopped and had Mike Dawson knock on my door.	1	witness finish.
2	Q What was the fourth episode of sex that you had with	2	MR. SCHRIMPF: I thought she was.
3	the Mayor?	3	I'm sorry.
4	MR. ARELLANO: I'm going to object	4	Q Please make sure you finish your answer.
5	to the form of the question as vague and also	5	A It was advances made by him but --
6	because I believe we talked about four	6	Q How many times --
7	episodes. If she understands your question	7	MR. ARELLANO: Let --
8	the way you phrased it -- first listen to the	8	Q Are you done?
9	question.	9	A The reason I went to the office is he wanted to talk
10	Q Well, let me try it this way, Ms. Figueroa. As I	10	to me about work related stuff.
11	understand it, when we left off yesterday you were	11	Q And what was the work related stuff?
12	talking about an episode of sex at Fardale where you	12	A I didn't -- after I got to the office it was clearly
13	went down to the lobby and let the Mayor in?	13	not work related stuff.
14	A Yes.	14	Q At the time that you went to the office, what did
15	Q And then you had sex in your bedroom in that	15	you believe, if anything, respecting what you were
16	apartment?	16	going to talk about with the Mayor?
17	A Yes.	17	MR. ARELLANO: Objection, asked and
18	Q What was the next time you had sex with the Mayor?	18	answered. She may answer again if she
19	A I don't remember the sequence of the times, but I	19	understands your question.
20	know that -- I know that he had requested me to go	20	A I was the person in that office that did all of the
21	to his office for a second time.	21	outreach, all of the connecting groups, all the
22	Q Well now, I take it as a staff assistant to the	22	organizing people together. And so I thought that
23	Mayor from time to time you would go into the	23	we were going to talk about how to proceed with some
24	Mayor's office for all sorts of business reasons; is	24	issue that was important to him.
25	that right?	25	Q But as you sit here today, do you recall what that
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1	A Yes.	1	issue was?
2	Q You're saying now he requested you to come to his	2	A No. But someone in the office, there was police
3	office for the second time?	3	officers there, so it didn't bother me because the
4	A Yes.	4	police were there.
5	Q Are you thinking of the second time that you and he	5	Q So do you remember which officer was there on this
6	had sex in the office?	6	occasion?
7	A Yes.	7	A I think maybe it could have been Linda Velasco.
8	Q Do you remember when the first time was that you had	8	Q Linda Velasco?
9	sex in the office?	9	A Yes.
10	A I don't know if we were dealing with Potawatomi	10	Q And how did -- on the occasion that you're thinking
11	issues in the office. No, it wasn't. It was some	11	of now, this is an occasion when you had sex with
12	issue that we were dealing with at work about some	12	the Mayor in the office?
13	main concern he had.	13	A That was the second time.
14	Q Was this -- whatever you're thinking of now, was	14	Q And you recollect Linda Velasco being there?
15	that on a weekend or a weekday?	15	A Securify was there both times.
16	A It was a weekend.	16	Q But the time you're thinking of was the second time
17	Q How many times did you have sex with Mayor, with the	17	and you recollect Linda Velasco being there?
18	Mayor in the office?	18	A To the best of my knowledge, yes.
19	MR. ARELLANO: Objection, asked and	19	Q And the Mayor called you to be there?
20	answered.	20	A That whole two weeks before that he had requested
21	Q Subject to the objection.	21	for me to be at different events so that he could
22	A I think it was once, and the second time he, he	22	take -- so that I would take him home. He would
23	tried.	23	request -- he would phone call and phone call and
24	Q So there was --	24	phone call. And if I didn't answer those phones,
25	MR. ARELLANO: Hold on, let the	25	the next day it was very obvious that he was angry.
183		185	

1 So when he -- one of the -- he was saying that he  
2 was like giving me another chance, so he told me I  
3 need you to be here this week and make sure you're  
4 here this weekend, whether it was Saturday or  
5 Sunday, I don't remember, but I know it was the  
6 weekend.  
7 Q Do you remember what time you arrived at the office?  
8 A It was in the morning and I signed my name on the  
9 sign-in sheet downstairs. You know, when you walk  
10 in after hours, they make you sign the sign-in  
11 sheet.  
12 Q And you signed in?  
13 A Yes.  
14 Q And did you go directly to your office or did you go  
15 to the Mayor's office?  
16 A I went to my office.  
17 Q What did you do when you got to your office?  
18 A I waited awhile, and then he came out of his office  
19 and he said what are you doing here, and he directed  
20 me to go to his office.  
21 Q And you went to his office?  
22 A Yes.  
23 Q And then what happened?  
24 A He closed the shutter, the door -- the windows and  
25 the doors and he wanted to have sex with me.

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1 Q He took nothing off of you?  
2 A No. He took his pants zippers down.  
3 Q His pants zipper was down? Was his penis exposed?  
4 A Yes.  
5 Q Was his penis erect or was it not erect?  
6 A Yes.  
7 Q Well --  
8 A Erect.  
9 Q It was erect? At what point did you observe his  
10 pants wet?  
11 A When -- it was towards the end of being in that  
12 office with him, which I think maybe 20 minutes  
13 passed.  
14 Q Let me see if I have a correct understanding of what  
15 you just said. So if I say something that's  
16 incorrect, you stop me. You came into the office,  
17 you were fully clothed and never in any way became  
18 undressed?  
19 A No.  
20 Q The Mayor then closed the blinds to the windows in  
21 his office? You have to answer verbally.  
22 A Yes.  
23 Q When he was doing this, where were you standing in  
24 relation to his desk?  
25 A The chairs in his desk are like this. I was

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1 Q Did you have sex?  
2 A Not the second time. The first time but not the  
3 second time.  
4 Q The time that you're thinking of when Linda Velasco  
5 was there, you're losing me, was that the first time  
6 or the second time?  
7 A I think it was the second time.  
8 Q So the second time there was an effort on the part  
9 of the Mayor to lure you into a sexual liaison but  
10 it didn't happen?  
11 A He --  
12 Q Is that right?  
13 A He wet his pants.  
14 Q He wet his pants?  
15 A Yes.  
16 Q Is that to say that he ejaculated in his pants  
17 before you accomplished the sex act?  
18 A Before he accomplished the sex act.  
19 Q At the time that he ejaculated in his pants, what  
20 was the state of your dress or undress?  
21 A I was, I was dressed.  
22 Q Totally?  
23 A Yes.  
24 Q You took nothing off?  
25 A No.

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1 standing in back of the chairs.  
2 Q And which way were you facing, towards the front of  
3 the office or towards the back of the office where  
4 the door is?  
5 A Towards the front where he was.  
6 Q Okay. You were facing the front. At the time that  
7 you entered the office, was the Mayor's pants  
8 already unzipped?  
9 A No, not that I remember.  
10 Q But you observed that they were wet?  
11 A Yes. Later on at that point, later on at that time.  
12 Q Were they wet -- did you observe them being wet when  
13 you came into the office?  
14 A No.  
15 Q So they became wet after you were in the office and  
16 while the Mayor was closing the blinds?  
17 A No, not necessarily while he was closing the blinds.  
18 The windows -- the curtains. It was after he turned  
19 around instead of sitting at his table he sat in the  
20 middle of his, of where the desks were.  
21 Q Did he sit on the guest side of the desk or the  
22 Mayor's side of the desk?  
23 A The guest side.  
24 Q The guest side of the desk. Was his back leaning  
25 against -- was he sort of sitting on the desk and

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1 sort of standing on the floor, that kind of a pose?  
 2 A Sitting on the desk and standing?  
 3 Q Well, leaning against the desk, put it that way with  
 4 his feet on the floor.  
 5 A No. He stood up to close the curtains and I started  
 6 to walk closer to the door.  
 7 Q Okay.  
 8 A To try to get out.  
 9 Q All right.  
 10 A And he joked about why we were there.  
 11 Q He joked about what?  
 12 MR. ARELLANO: Go ahead. Finish  
 13 your answer.  
 14 A I don't remember in the exact words, but he made a  
 15 comment about his loins hurt.  
 16 Q I'm sorry, his what hurt?  
 17 A His loins.  
 18 Q His loins hurt?  
 19 A Yes.  
 20 Q Did you understand what he meant by that?  
 21 A Not -- not at the time.  
 22 Q Did you subsequently find out what he meant by that?  
 23 A Yes. Because he grabbed his, put his hands in his  
 24 pocket and he touched himself.  
 25 Q I see. Was, when he turned around and he was  
 190

1 facing -- was he facing you as he was leaning  
 2 against his desk?  
 3 A Yes. No, not against his desk, against -- he got  
 4 out of his desk and went to close the window. So he  
 5 was standing in back of a chair. And then he  
 6 stepped out of the chair and he had the smirk that  
 7 he gives on his face. And then he was real  
 8 comfortable and joking and -- and he was real almost  
 9 sarcastic, I don't know what word to describe it,  
 10 but he knew that I was uncomfortable and that he  
 11 tricked me into being there.  
 12 Q Well, what I'm trying to ascertain is at the point  
 13 in time that he came around to the guest side of the  
 14 desk --  
 15 A Yes.  
 16 Q -- first question, was his pants unzipped?  
 17 A No.  
 18 Q Second question, was his pants wet?  
 19 A Yes.  
 20 Q At what point did he unzip his pants?  
 21 A At that time he didn't unzip his pants.  
 22 Q He never unzipped his pants?  
 23 A Not at that time.  
 24 Q You turned to leave?  
 25 A Yes.  
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1 Q And you left?  
 2 A Yes.  
 3 Q And you didn't have sex?  
 4 A No.  
 5 Q And the Mayor had his hands in his pants?  
 6 A Yes. I kept getting closer and closer to the door  
 7 to leave, and he was angry when he saw that I was  
 8 leaving. But I left.  
 9 Q Did he ask you to do anything on this occasion?  
 10 A He wanted me to have sex with him.  
 11 Q Vaginal sex?  
 12 A Yes.  
 13 Q Did he specify one way or the other?  
 14 A No. He just wanted me to be, to have sex with him.  
 15 He said I want you -- I want you. I need to have  
 16 you.  
 17 Q And you left?  
 18 A And I said to him --  
 19 MR. ARELLANO: Why don't you let  
 20 her finish.  
 21 MR. SCHRIMPF: I'm sorry, I thought  
 22 she was.  
 23 A I said to him, Mayor, you have to stop this. Please  
 24 stop this, Mayor. I thought we went over this.  
 25 Q Do you remember when this episode occurred?  
 192  
 1 A No, but I remember there were workers there working  
 2 on the building, on the building.  
 3 Q On the outside of the building?  
 4 A In the inside, the second floor on some of the  
 5 doors.  
 6 Q I see. And this was a weekend?  
 7 A Yes.  
 8 Q Was this, what you have just described to me, the  
 9 first time or the second time?  
 10 A The second time.  
 11 Q Was there ever a time when you and the Mayor had sex  
 12 in the office which was accomplished?  
 13 A Yes.  
 14 Q When was that?  
 15 A It was before that time.  
 16 Q Do you remember the date?  
 17 A No, I don't.  
 18 Q How did you come to the office that day?  
 19 A With my car.  
 20 Q Why were you at the office that day?  
 21 A There were, between these episodes there were many,  
 22 many times that he was trying to plan that he was  
 23 asking me to make sure that I answered the phone.  
 24 There were a time that he was angry. He made it  
 25 clear to not cross him, that he made it clear that  
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1 he, when he got -- when he was mad at people, that  
2 he had ways to be able to let them know. And he was  
3 angry with me for periods of time that I didn't --  
4 that I would sneak out of the office and that I  
5 didn't answer the phones and that I didn't say,  
6 okay, you have -- you know, he would have an event  
7 in the evening and I was supposed to show up and I  
8 wouldn't show up.

9 And so the day that the sexual thing happened  
10 in the office was because of all of the times and  
11 excuses and many, many phone calls from him, him  
12 stopping into my office to, for him to be able to  
13 plan to have intercourse.

14 Q Could we go back to the question?

15 MR. ARELLANO: Did you finish?  
16 Don't let anything interrupt you when you  
17 haven't finished.

18 MR. SCHRIMPF: Well, but I also  
19 want --

20 MR. ARELLANO: You can also ask  
21 counsel to let you finish if you feel you  
22 haven't finished, okay? Have you finished?

23 THE WITNESS: I think I did.

24 Q Let's go back to the question. We'll have the court  
25 reporter reread the question.

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1 ready for high school. And the Mayor made it clear  
2 to me that if I didn't have sex with him that I  
3 could lose that.

4 Q Are you done?

5 A Yes.

6 Q So on this occasion when you went to the office, you  
7 went to the office for the express purpose of having  
8 sex with the Mayor?

9 A I was hoping it wasn't going to be that, but it  
10 turned out to be that.

11 Q How did the Mayor tell you that he was the most  
12 powerful person in the city who could do all these  
13 terrible things to you?

14 A It was a sort of regular conversation that he  
15 rephrased different times.

16 Q How did he phrase it?

17 A You should feel lucky that you're with the most  
18 powerful man. He told me that when someone crosses  
19 him, he has ways to get back to them no matter what.  
20 He was very clearly angry when I went back to work  
21 when I wouldn't take the phone calls or when I  
22 wouldn't open the door for him.

23 He mentioned that he was close friends to  
24 Chief Jones. I believed him and Chief Jones -- I  
25 believed Chief Jones knew. Until the chief did the

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1 (Question read).

2 THE WITNESS: Can I answer it?

3 MR. ARELLANO: You already did.

4 Let him ask you the question.

5 Q Do you recall when this occurred?

6 A No.

7 Q Did you have an apparent purpose of being in the  
8 office that day?

9 A The Mayor made it clear to me that if I didn't have  
10 sex with him, that he was going to do something that  
11 was going to hurt my position. I was afraid of  
12 being fired. I was afraid of my children. And I  
13 was afraid because he had mentioned that, something  
14 about Chief Jones. So I was afraid that he, the  
15 Mayor and Chief Jones were the two most powerful  
16 people in Milwaukee, and so how was I supposed to --  
17 I couldn't go anywhere after that job.

18 Q How did the Mayor tell you --

19 MR. ARELLANO: Hold on, counsel.

20 Let her finish.

21 Q Are you done?

22 A No. This was a job that was going to give me the  
23 opportunity to have a good life for my children. I  
24 was able to save money, pay the bills my ex-husband  
25 left and had the down payment and have my kids be

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1 deposition, I was afraid of what was going to happen  
2 to me. I was afraid.

3 Q Did the Mayor use those words?

4 A Yes.

5 Q He said, "I am the most powerful person in the  
6 city"?

7 A Yes.

8 Q He said that he gets even with anybody who crosses  
9 him?

10 A Yes.

11 Q Do you remember when he told you those things?

12 A When I began in 1998 to be more stronger to stop, to  
13 tell him that I was going to stop and that I was  
14 going to get help and that he should get help.

15 Q You told him those things?

16 A Yes.

17 Q Were you fired?

18 A Not at that time.

19 Q Did you have any loss of gains of income in your  
20 job?

21 A The regular, how the City all sort of does the  
22 regular small increases every year.

23 Q As you progress through the steps of your pay range?

24 A Yes.

25 Q Do you know if those can be stopped?

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1 A I don't know.  
 2 Q But they never were?  
 3 A I never looked at it.  
 4 Q You have no knowledge that they were ever prevented  
 5 to you; is that right?  
 6 A No. I'm sorry, no.  
 7 Q All right. On the occasion that you had sex in the  
 8 office when you actually had sex, you don't remember  
 9 the date?  
 10 A Just that it was a Saturday.  
 11 Q Just that it was a Saturday. And you remember that  
 12 there were people in the building doing things?  
 13 A There was like not construction workers but maybe  
 14 people working on the doors on -- they were working  
 15 on something, yes.  
 16 Q Were they working on things in the Mayor's office or  
 17 in some other offices?  
 18 A No. Around between the Council and the Mayor's  
 19 office there's I think some -- there's some doors  
 20 that they were working on.  
 21 Q But nothing was being done in the Mayor's office?  
 22 A No.  
 23 Q Or any of the office complex of the Mayor?  
 24 A Not that I know of.  
 25 Q How did you know to come to the office that day when

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1 you had sex on the weekend?  
 2 A Because I exhausted all of my excuses and because he  
 3 made it clear to me before that not to cross him.  
 4 Q Well, did the Mayor call you?  
 5 A Yes.  
 6 Q How did the Mayor call you?  
 7 A From the office.  
 8 Q That day?  
 9 A Yes.  
 10 Q Did he call you at your residence?  
 11 A Yes.  
 12 Q Did you have a cell phone at this time?  
 13 A I don't think I did.  
 14 Q So he would have called you on the regular home  
 15 telephone that you have?  
 16 A Yes.  
 17 Q How did you know it was the Mayor calling?  
 18 A It said anonymous.  
 19 Q How many times did the phone ring?  
 20 A Friday night maybe --  
 21 Q No, no. Strike that. On the occasion that you knew  
 22 it was the Mayor calling on this day that you went  
 23 to the office, how did you know it was the Mayor  
 24 calling?  
 25 A I'm trying to explain to you the sequence of how I

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1 knew that.  
 2 MR. ARELLANO: Go ahead.  
 3 A He, when I -- first of all, when I was in the  
 4 office, he told me make sure you're home this  
 5 weekend.  
 6 Q When did he tell you that?  
 7 A The week, every chance he would get to pop into my  
 8 office he made that clear.  
 9 Q So he told you that the week preceding this?  
 10 A Yes.  
 11 Q Okay.  
 12 A So then I was supposed to talk to him after  
 13 everybody left because that was his thing to be able  
 14 to have a conversation with me. He said answer your  
 15 phone.  
 16 That Friday night the phone rang and rang and  
 17 rang and rang about six, seven, eight times.  
 18 Sometimes then on Saturday it rang a lot. I knew  
 19 that if I didn't go, Monday was going to be a very  
 20 difficult time for me. And I was going through  
 21 panic attacks to have to deal with going back to  
 22 work on Monday if I didn't answer the phone.  
 23 So I figured I had to do this and it would  
 24 stop for awhile. And so I went and I knew.  
 25 Q Are you done?

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1 A Yes.  
 2 Q On any of the occasions that the phone rang, either  
 3 the night before or the day of this episode did you  
 4 ever answer the phone?  
 5 MR. ARELLANO: Did you listen to  
 6 the question? You need a break to get  
 7 yourself together?  
 8 THE WITNESS: No, I'm fine.  
 9 A I had to answer it after all the phone calls.  
 10 Q When the phone would ring, you said it rang a number  
 11 of times the night before and I think you said six  
 12 or seven times the day of. Did it ring a certain  
 13 number of times and then stop and then start ringing  
 14 again, or did it just ring continuously?  
 15 A Just rang continuously.  
 16 Q Continuously?  
 17 A Yes. You know, he would call and leave it rang for  
 18 a long time because I wanted to shut my answering  
 19 machine off so he couldn't have to leave a message.  
 20 And then he would call another 10 minutes and then  
 21 he would call again five minutes and then he would  
 22 call again. And he kept doing that.  
 23 Q And because your phone was -- you have caller I.D.?  
 24 A At that time, yes.  
 25 Q And because your phone was showing anonymous, you

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1 concluded it was the Mayor calling?	1 bathroom of the staff, trying to hold my composure.
2 A Yes.	2 I went to the lake front and then I had to come
3 Q What time did you get to the office that day?	3 home. And I took hot baths and that was it.
4 A It was sometime probably mid to late morning.	4 Q Did he use any birth control protection?
5 Q Late morning?	5 A No, he did not.
6 A Mid to late.	6 Q
7 Q Did you get home that day?	7 A
8 A Right after that, yes.	8
9 Q What time did you get home?	9 Q
10 A I -- probably about 3 o'clock. I took a ride to the	10 A
11 lake and then went straight home.	11 Q
12 Q Afterwards?	12 A
13 A Yes.	13 Q
14 Q How did you and the Mayor have sex that day? What	14 A
15 happened?	15
16 A There was not much said. There was not no	16
17 conversations. He just had sex with me.	17
18 Q Did he undress you or did you undress yourself?	18 Q
19 A He lift my skirt.	19 A
20 Q He lifted your skirt?	20 Q Have we covered both episodes of sex or attempted
21 A Yes.	21 sex in the office?
22 Q Did you have undergarments on?	22 A Yes.
23 A Yes.	23 Q Were there any others?
24 Q How did they get removed?	24 A Not the sex.
25 A He pulled them down.	25 Q We now have the episodes of sex in the office and we
202	204
1 Q Totally or just far enough?	1 have an episode of sex at Fardale and once at his
2 A Just far enough.	2 house, and I believe that was the first time; is
3 Q How did he get undressed?	3 that right?
4 A He unbuckled his pants.	4 A I'm sorry, yes.
5 Q Himself?	5 Q And we have the second one at 912 South, I believe
6 A And his zipper.	6 it was 26th Street?
7 Q Himself?	7 A 912 is South 19th Street.
8 A Yes.	8 Q I'm sorry, South 19th Street. What was the next
9 Q You did not assist in any way?	9 episode of sex between you and the Mayor?
10 A No, no.	10 A I don't recall the -- I can't recall the
11 Q He exposed his genitals?	11 chronological order.
12 A Yes.	12 Q You can't recall the order, but whatever one you're
13 Q At the point that he exposed his genitals was he	13 thinking of now would be helpful.
14 erect or not erect?	14 A In 1997 it was -- I realized it was over and that
15 A Yes, he was.	15 nothing was -- each time I thought it was over. I
16 Q He was erect?	16 thought he was -- I thought he was going to -- he
17 A Yes.	17 promised it wouldn't happen again. He promised that
18 Q And you had sex?	18 he would stop. So in 1998 -- well, between '97 and
19 A He penetrated me. I cried. It was painful. I told	19 '98 I felt, especially '98, that I finally could do
20 him to please --	20 my work. I finally -- he wasn't going to demand to
21 Q I'm sorry?	21 have sex with me and that I would be able to do my
22 A -- stop.	22 work. And I -- I think during that time
23 Q You told him to stop?	23 Brenda Wood -- there was -- Michal Dawson left the
24 A He did what he did and I raised my -- put my	24 position and Brenda Wood -- and it was a position
25 clothes, my shirt and my skirt down, walked into the	25 that was open and I tried --
203	205

1 Q Was that '97 or '98 that Michal Dawson left?  
 2 A I don't remember, but it was during that time. I  
 3 tried to talk to Ruth Wyttenbach is the person that  
 4 you go to to have meetings. Staff can go in there  
 5 whenever they want, but, you know, to have a formal  
 6 meeting you should go through Ruth.  
 7 Mike Dawson was leaving and I had asked if  
 8 I -- because I worked on the policy committee,  
 9 Mike Dawson worked with the Council, I already dealt  
 10 with the eight aldermen, and I had been there many  
 11 years, and I felt I was experienced to do that job.  
 12 Q How many aldermen are there?  
 13 A 17.  
 14 Q Please continue.  
 15 A I, in 1998 I started working at Pedro Colon's  
 16 campaign. I did a fund raiser for the Mayor in the  
 17 Hispanic community. In 1998 when he was working on  
 18 Pedro Colon's campaign, Bill Christofferson, they  
 19 all encouraged me to do it, including the Mayor in  
 20 front of everybody. I put a lot of time into that  
 21 campaign.  
 22 During that campaign it was the best time for  
 23 me to be able to have excuses that I wasn't around  
 24 because I was working nights and weekends on the  
 25 campaign. The Mayor was getting angrier about me

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1 not answering the phone calls and -- but I felt  
 2 safer working on the campaign. So I worked on the  
 3 campaign. I did my fund raiser that the Mayor and  
 4 Bill Christofferson and Barb Candy wanted me to do.  
 5 It was a successful -- it was for the Latino  
 6 community and it was a successful fund raiser.  
 7 And then at that fund raiser he kept, there  
 8 was a lot of people there, but he kept crossing  
 9 other people and trying to come to me and give me  
 10 hugs and give me kisses and keep hugging and take  
 11 pictures. And I was uncomfortable with that.  
 12 Q Was Ms. Mudd there?  
 13 A Yes, she was.  
 14 Q Please continue.  
 15 A And after that campaign was over, and I think the  
 16 campaign was in December, I --  
 17 Q December of 1998?  
 18 A Yes. And the campaign and the -- and I think the  
 19 fund raiser that I had to do for the Mayor was in  
 20 December. When I was working on Pedro's campaign,  
 21 everybody was happy with it but the Mayor. But in  
 22 front of the people he seemed happy with it. But he  
 23 was angry with me because I wasn't, I wasn't at  
 24 places where he wanted me to be and I wasn't  
 25 answering the phone calls. And I was able to say I

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1 can't. I'm working on the campaign.  
 2 After the campaign -- then after when I did  
 3 the fund raiser for the Hispanic community is when  
 4 he started coming around and I started -- I felt  
 5 stronger. I felt I can now -- I was stronger to be  
 6 able to say this has to stop and it's going to stop  
 7 and I'm going to go get help and you should get  
 8 help. And I was going to talk to people to help me  
 9 because this was really difficult.  
 10 Q Did you go to any doctors --  
 11 MR. ARELLANO: Are you finished?  
 12 THE WITNESS: No.  
 13 MR. ARELLANO: Go ahead and finish.  
 14 You said it was very difficult.  
 15 A What I meant was with getting help was being able to  
 16 talk to Bill Christofferson, Jim Rowen,  
 17 Ruth Wyttenbach, Michael Morgan and the Department  
 18 of Employee Relations. I didn't understand that  
 19 they're all connected, but they were.  
 20 So after that fund raiser I felt strong and I  
 21 was also -- at this time I shared it with  
 22 Kimberly Pratt in a very painful conversation.  
 23 And --  
 24 Q When you say at this time, do you mean December of  
 25 1998?

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1 A Uh-huh.  
 2 Q You shared this with Kimberly Pratt?  
 3 MR. ARELLANO: Did you finish your  
 4 answer?  
 5 THE WITNESS: No.  
 6 A I was --  
 7 Q Well, I kind of wish, Ms. Figueroa, you would speed  
 8 this up a bit if you could.  
 9 MR. ARELLANO: Well, hold on a  
 10 second, counsel. You can't dictate how she  
 11 should answer the question. In light of the  
 12 circumstances she's answering the question and  
 13 you've got to let her answer the question.  
 14 MR. SCHRIMPF: Well then, we might  
 15 need more time with her.  
 16 MR. ARELLANO: Well, you do  
 17 whatever you have to do, but I want her to  
 18 have the ability to explain in her own terms  
 19 the answer.  
 20 MR. SCHRIMPF: Yes.  
 21 MR. ARELLANO: Thank you. Please  
 22 continue.  
 23 (Recess)  
 24 By Mr. Schrimpf (continuing)  
 25 Q On either of the times that you were with the Mayor

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<p>1 in the office on the weekends --</p> <p>2 A Yes, sorry.</p> <p>3 Q -- which one was Linda Velasco present?</p> <p>4 MR. ARELLANO: Objection, asked and</p> <p>5 answered.</p> <p>6 MR. SCHRIMPF: Well, I'm unclear.</p> <p>7 Q First time or second time?</p> <p>8 A I'm not sure.</p> <p>9 Q You're not sure?</p> <p>10 A I know there was police in that back room.</p> <p>11 Q Did you sign in at the --</p> <p>12 A Downstairs.</p> <p>13 Q Yes. The information booth both times?</p> <p>14 A Yes.</p> <p>15 Q Or only one time?</p> <p>16 A Two times.</p> <p>17 Q Whenever you came in after hours, did you sign in at</p> <p>18 the information booth?</p> <p>19 A Yes.</p> <p>20 Q When you left, did you sign out?</p> <p>21 A Yes.</p> <p>22 Q If Linda Velasco was not present at any of these</p> <p>23 events, do you know -- on the weekends with the</p> <p>24 Mayor, do you know which officer was?</p> <p>25 A Not really. Could have been --</p> <p style="text-align: center;">210</p>	<p>1 wanted you to go to Chicago?</p> <p>2 A Yes.</p> <p>3 Q When he would ask you to go to Chicago, would he</p> <p>4 call you?</p> <p>5 A He came to my office.</p> <p>6 Q So this was in person?</p> <p>7 A Yes. He came to my office.</p> <p>8 Q What did he say?</p> <p>9 MR. ARELLANO: Hold on. She's</p> <p>10 trying to provide you with an answer. Go</p> <p>11 ahead.</p> <p>12 A He would get copies of his calendar. Ruth always</p> <p>13 made copies of the calendars, the staff.</p> <p>14 Q That was for all the staff assistants?</p> <p>15 A Yes. And it's his calendar. But then there's</p> <p>16 staff people that are on the calendars. He would</p> <p>17 come in and circle different times, and then he gave</p> <p>18 them to me. That's one way.</p> <p>19 He would, if I had a meeting with a group of</p> <p>20 people, he would ask Marilyn, can you stay, I need</p> <p>21 to talk to you about some stuff in his office. And</p> <p>22 he would tell me, did you look at the calendar? And</p> <p>23 I had a bad habit of not looking at the calendar. I</p> <p>24 said no. He goes, well, you need to check out those</p> <p>25 dates.</p> <p style="text-align: center;">212</p>
<p>1 Q I don't want you to speculate.</p> <p>2 MR. ARELLANO: If you know.</p> <p>3 A Oh, okay.</p> <p>4 Q Only if you know. And you don't know; is that</p> <p>5 right?</p> <p>6 A No, I don't know.</p> <p>7 Q When you came to the office on the weekends that you</p> <p>8 were talking about, how did you enter the Mayor's</p> <p>9 office?</p> <p>10 A We had keys.</p> <p>11 Q You used the front door?</p> <p>12 A And the card, the blue card.</p> <p>13 Q So you used the card and a key?</p> <p>14 A Yes.</p> <p>15 Q Did you have sex at all with the Mayor in 1997?</p> <p>16 A I don't recall that year. I remember that I felt</p> <p>17 good that he, that things I thought had stopped.</p> <p>18 Q When you -- yesterday we talked about the 1996</p> <p>19 democratic convention.</p> <p>20 A Yes.</p> <p>21 Q How did you know that the Mayor wanted you to go to</p> <p>22 Chicago?</p> <p>23 A Because that was one of the times that he tried to</p> <p>24 get me to go to Chicago.</p> <p>25 Q You said that there were about 10 or 15 times he</p> <p style="text-align: center;">211</p>	<p>1 He would come straight to my office and then</p> <p>2 ask me, did you check it out? And then he would</p> <p>3 call.</p> <p>4 Q On the phone?</p> <p>5 A And call and call, yes.</p> <p>6 Q And when he would call on the phone, was he calling</p> <p>7 at the office phone from his office or was he</p> <p>8 calling you at home?</p> <p>9 A He was calling me at my house, and I'm not sure</p> <p>10 where because all of the phone numbers he had were</p> <p>11 blocked. They were all private, anonymous.</p> <p>12 Q Yes, I understand that. Of the 10 or 15 times that</p> <p>13 you reference, these were all trips to Chicago?</p> <p>14 A Yes.</p> <p>15 Q And where were you supposed to stay?</p> <p>16 A The only time that it got to the real detail was the</p> <p>17 time that I actually went because I wouldn't answer</p> <p>18 the phone.</p> <p>19 Q But the trip to Chicago for the democratic</p> <p>20 convention, how did you know you were supposed to go</p> <p>21 to Chicago to meet him?</p> <p>22 A He had, because he gave -- he gave -- he told me</p> <p>23 that I, that here's an opportunity for him to be at</p> <p>24 this thing and he'd like for me to be there.</p> <p>25 Q What hotel were you going to stay at?</p> <p style="text-align: center;">213</p>

1 A I didn't know that till -- I actually thought it  
2 wasn't going to happen again and --  
3 Q Listen to my question. What hotel were you going to  
4 stay at?  
5 A He said that was the Palmer hotel.  
6 Q The Palmer hotel?  
7 A Yes.  
8 Q Was that the hotel he was staying at?  
9 A He said no.  
10 Q He said no?  
11 A Yes.  
12 Q Did you know if the Mayor was going to travel with  
13 any other persons from the office?  
14 A I thought there were several people that would be  
15 traveling to that.  
16 Q Did you know if Mr. Christofferson was one?  
17 A I would think he would be, but I didn't -- I wasn't  
18 for sure.  
19 Q Do you remember if the Mayor was a delegate to the  
20 convention?  
21 A No. I don't know that.  
22 Q I want to make sure that I understand this. You  
23 simply didn't go to Chicago in 1996; is that  
24 correct?  
25 A That's correct.

214

1 Q Did you ever tell the Mayor you weren't going to go?  
2 A Yes. I had said to him at that time I thought we  
3 were going to stop this. I'm uncomfortable going  
4 there. I kept saying I can't -- I told him that I  
5 was uncomfortable, and I told him that he had  
6 promised the last time that it was not going to  
7 happen again.  
8 Q So I think the answer to my question is yes?  
9 MR. ARELLANO: Hold on. I  
10 understand you may not like the answer, but  
11 you've got to let her finish the answer.  
12 MR. SCHRIMPF: Counsel --  
13 MR. ARELLANO: No, hold on.  
14 MR. SCHRIMPF: Let's have the  
15 question reread.  
16 MR. ARELLANO: She's answering the  
17 question. Are you done answering the  
18 question?  
19 THE WITNESS: I think so.  
20 Q What about the second trip to Chicago? I have  
21 several questions. No. 1, how was the trip set up?  
22 A He set it up.  
23 Q How did he set it up?  
24 A Again, I think he was before that trip in Chicago or  
25 wherever he came into my office, and during this

215

1 time he was showing how angry he was with me to not  
2 follow through on things. So he -- I had a list of  
3 excuses. I wouldn't answer the phone. I snuck out  
4 of the office. I would make sure people were there  
5 in the office. And so he knew that and he was upset  
6 with that. So he gave -- he put an envelope  
7 together, and he put it there and he put a thing of  
8 the trains. And when he put that down, he said to  
9 me, now you have no excuse. And then he saw the  
10 look on my face. I was -- I was, I was just stunned  
11 and I had -- he came back -- he left and he came  
12 back because before he left he said, "don't you  
13 cross me."  
14 Q He said those words?  
15 A "Don't you cross me."  
16 Q And you understood that to mean show up in Chicago?  
17 A Yes.  
18 Q Did you?  
19 A Yes, I did.  
20 Q What hotel did you check into?  
21 A It was the Palmer.  
22 Q Palmer House?  
23 A Yes.  
24 Q What did you use to pay for the bill?  
25 A This envelope, he had this envelope that he had the

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1 money for the room.  
2 Q Do you remember when this was?  
3 A No, I don't.  
4 (Exhibit No. 5 marked for  
5 identification)  
6 Q Ma'am --  
7 A Yes.  
8 Q -- showing you what the court reporter has marked as  
9 Exhibit No. 5 --  
10 A Yes.  
11 Q -- appears to be copies of telephone bills and some  
12 detail of telephone bills; is that correct?  
13 A Yes, it is.  
14 Q And they all appear to be dated either August of  
15 1997 or October of 1997; is that correct?  
16 A Yes.  
17 Q And there is a couple of calls to Chicago, Illinois;  
18 is that correct?  
19 A Yes.  
20 Q And this telephone number that they are billed to,  
21 this is your home telephone number at the time?  
22 A I'm sure -- yes, 228-9966.  
23 Q Could I see the exhibit for a second?  
24 A Sure.  
25 Q Thank you. There appear --

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1 MR. ARELLANO: How many pages are  
2 we talking about for exhibit, what is it  
3 Exhibit --  
4 MR. SCHRIMPF: We are looking at  
5 Bates stamp Nos. 0001 through 0007.  
6 Q And if you look at page --  
7 MR. ARELLANO: Is that Exhibit 1,  
8 2?  
9 MR. SCHRIMPF: Exhibit 5.  
10 Q And if you look at page 0002, you see, or at least I  
11 see two telephone calls to area code (312)726-7500  
12 being made on September the 9th and September the  
13 12th of 1997. Ask if you see those.  
14 A Yes, yes.  
15 Q Do you know what telephone number that is?  
16 A No. I know that during --  
17 MR. ARELLANO: Do you know what  
18 phone number?  
19 THE WITNESS: No.  
20 Q Did you ever call the Palmer House from your home  
21 telephone?  
22 A I don't know if it was the Palmer House or -- I mean  
23 from my home or my work.  
24 Q But you don't know if you ever called the  
25 Palmer House from your home?

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1 A No.  
2 Q Do you know if you ever called the Palmer House from  
3 work and billed it to your home phone number?  
4 A Probably.  
5 Q And do those calls reflect that?  
6 A It says -- I don't know if it's Palmer House. It  
7 says Chicago.  
8 Q Right. And (312)726-7500?  
9 A Yes.  
10 Q Did you make your own reservations at the  
11 Palmer House?  
12 A Yes. I had to.  
13 Q How did you get to Chicago? Did you drive, take the  
14 train, take a bus?  
15 A A train, train.  
16 Q What date did you arrive in Chicago?  
17 A I don't remember that.  
18 Q What date did you leave Chicago?  
19 A The day after, the night -- actually the late night  
20 after.  
21 Q You and the Mayor had sex at the Palmer House in  
22 Chicago?  
23 A Yes.  
24 Q Did you give the Mayor any gifts?  
25 A No.

219

1 Q Did the Mayor give you any gifts?  
2 A No.  
3 Q Are you skilled at sewing?  
4 A Yes, I am.  
5 Q Are you capable of sewing, for example, your own  
6 clothes?  
7 A I've done small stuff like scarves and table cloths.  
8 Q What about a garment such as shorts?  
9 A Shorts? I made shorts for my kids, yes.  
10 Q You and the Mayor met in Chicago on September 8th or  
11 September 9th, 1997?  
12 A I'm not sure because my kids, this was Tampa -- my  
13 children, I was probably scheduling --  
14 Q I'm not asking about Tampa. I'm asking about  
15 Chicago.  
16 MR. ARELLANO: Well, she's  
17 answering.  
18 A But I have to call Chicago to, for my kids because  
19 they always leave from Chicago.  
20 Q But they didn't live at the Palmer House, did they?  
21 A No.  
22 Q You took the train to Chicago?  
23 A Yes.  
24 Q What time did you arrive in Chicago?  
25 A I don't remember.

220

1 Q Do you have copies of the Amtrak receipts or  
2 tickets?  
3 A No.  
4 Q What did you do with them?  
5 A I don't know. They're probably in the office.  
6 Q You would have kept them in the office?  
7 A Yes.  
8 Q You don't have them anymore?  
9 A I don't know. I don't think so.  
10 Q Do you remember what time you arrived in Chicago?  
11 A I really don't know.  
12 Q Did you and the Mayor go to places other than the  
13 Palmer House when you were in Chicago?  
14 A No. He wanted to.  
15 Q I think you've answered the question.  
16 A Oh, I'm sorry.  
17 Q Did you have dinner when you went to Chicago?  
18 A No.  
19 Q You and the Mayor simply had sex in the Palmer House  
20 and then you left?  
21 A Yes.  
22 Q How long did the Mayor stay in your room?  
23 A Maybe 45 minutes to an hour.  
24 Q Do you remember what time he left your room?  
25 A It was late, late, it was that evening but not

221



1 really late.  
 2 Q Was it before or after midnight?  
 3 A It was before.  
 4 MR. SCHRIMPF: Let's go off the  
 5 record for a second.  
 6 (Recess).  
 7 MR. SCHRIMPF: We can go back on  
 8 the record.  
 9 Q In your third amended complaint at paragraph 15-C  
 10 you make the following allegations: "On at least  
 11 two occasions Mayor Norquist arranged a trip to  
 12 Chicago on 'work related business' where he directed  
 13 complainant to secure a separate hotel room by  
 14 providing her with cash to cover expenses. On at  
 15 least one occasion he had to return to his hotel  
 16 room because he was expecting telephone calls."  
 17 A Yes.  
 18 Q Do you see that?  
 19 A Yes.  
 20 Q With respect to the Palmer House liaison in Chicago  
 21 in 1997, does paragraph 15-C refer to that?  
 22 A Yes.  
 23 Q Did he tell you he had to go back to his hotel room  
 24 because he was expecting telephone calls?  
 25 A Yes. And he was uncomfortable.

222

1 Q He said he was uncomfortable?  
 2 A With me being upset, yes.  
 3 Q You were upset?  
 4 A Yes.  
 5 Q How did you manifest being upset?  
 6 A I hated to have sex with him. He was, it was very  
 7 painful. It was something that I felt at times that  
 8 it had to happen so that he wouldn't, so that he  
 9 would stop. He promised he would stop.  
 10 Q Did he promise he would stop on this occasion?  
 11 MR. ARELLANO: Can you just let her  
 12 finish? You ask a question and then you don't  
 13 let her finish. You've got to let her finish.  
 14 He promised he would stop. Are you finished?  
 15 A And each time when he went through this process --  
 16 Q I can't hear you.  
 17 A And each time when he went through this process of  
 18 trying to come have sex, lots of time was before so  
 19 I believed it was done, you know, between. And this  
 20 was an occasion that I wanted it -- I didn't expect  
 21 to have to do this. And so I -- my demeanor was  
 22 not -- I was very depressed. I was very hurt. And  
 23 I was desperate and I was afraid.  
 24 Q Did you cry?  
 25 A Yes.

223

1 Q In his presence?  
 2 A Many times, yes.  
 3 Q Did you cry in his presence to this trip in Chicago  
 4 in 1997?  
 5 A Yes.  
 6 Q Did you tell him it must stop --  
 7 A Yes. I --  
 8 Q -- on this trip to Chicago in '97?  
 9 A Yes, I did.  
 10 Q Did he leave anything in the room when he left?  
 11 A All I wanted to do was get out of the room. I don't  
 12 know if he did or if he didn't.  
 13 Q So the answer to my question is you don't know?  
 14 A I don't know.  
 15 MR. ARELLANO: The answer is what  
 16 she gave you.  
 17 Q On the first trip to Chicago that was scheduled, did  
 18 you make reservations anywhere?  
 19 A He said he made them.  
 20 Q Where did he make them? If you know.  
 21 A I don't know.  
 22 Q On the first trip to Chicago did you ever say that  
 23 you were embarrassed because of articles of clothing  
 24 that were in the back seat of the car?  
 25 A No. Did I say that to --

224

1 MR. ARELLANO: Hold on. Just  
 2 listen to his question.  
 3 Q Did you ever say to the Mayor that you were  
 4 embarrassed by articles of clothing that were lying  
 5 in the back seat of your car, referencing the first  
 6 trip to Chicago?  
 7 A No.  
 8 Q You allege in paragraph 15-B that on three occasions  
 9 the Mayor stopped at your house with the purpose, or  
 10 the pretext rather, of discussing work related  
 11 business and that once at the residence he would  
 12 pressure you into sexual acts. Do you recall making  
 13 that allegation?  
 14 A Yes, I do.  
 15 Q We covered two of three. One --  
 16 MR. ARELLANO: Well, that's your  
 17 characterization. Go ahead.  
 18 Q All right. We covered 19th Street.  
 19 A 19th Street, yes.  
 20 Q And we covered Fardale?  
 21 A Yes.  
 22 Q What was the next one when he came to your residence  
 23 for the purpose of having sex?  
 24 A I remember the big, the stadium issue.  
 25 Q Where did you live when that occurred?

225

1 A 912 South 19th Street.  
 2 Q Didn't we already cover that one? Or did you not  
 3 cover it?  
 4 A Can I answer it?  
 5 MR. ARELLANO: Yes. If you  
 6 understand his question.  
 7 A Yesterday when you asked me questions you asked me  
 8 about specifics so -- about different --  
 9 Q Yes, I'm trying to ask you about specifics.  
 10 MR. ARELLANO: And I believe your  
 11 question was by reading the complaint you  
 12 posed a question regarding that allegation she  
 13 makes in the complaint. Now I don't know what  
 14 your next question is.  
 15 Q What were the other episodes -- when were the other  
 16 episodes where you had sex at a residence of yours  
 17 with the Mayor?  
 18 A In 199 -- in 1231 South 19th Street --  
 19 Q 1231 South 19th Street?  
 20 A 1231 South Pine Street.  
 21 Q 1231 South Pine?  
 22 A I'm sorry, I'm sorry. 3151 South Pine Street.  
 23 Q And when was this?  
 24 A That was the time that he had apparently spent and  
 25 the staff all night discussing the stadium, I think  
 226

1 proceed.  
 2 A The last time was --  
 3 MR. ARELLANO: I'm going to object  
 4 only to the extent that the question just  
 5 simply poses sex. So if she understands the  
 6 extent of that word, she should answer.  
 7 Q Do you understand the question?  
 8 A Yes.  
 9 Q Please continue.  
 10 A You're missing -- I'm sorry, Victor.  
 11 MR. ARELLANO: Well, just answer  
 12 the question. He's asking you about the last  
 13 time if you recall.  
 14 Q Do you remember when the last time was that you and  
 15 Mayor Norquist had sexual contact?  
 16 A Yes.  
 17 Q When was it?  
 18 A It was in late January.  
 19 Q In late January?  
 20 A Yes.  
 21 Q Of what year?  
 22 A Of 1999.  
 23 Q Late January of 1999?  
 24 A It was in January, of 1999.  
 25 Q That was absolutely the last time?  
 228

1 it was the stadium issue with the politicians in  
 2 Madison.  
 3 Q Do you remember the date?  
 4 A No, I don't.  
 5 Q Only the circumstance that he was in Madison all  
 6 night on the stadium?  
 7 A Yes.  
 8 Q He came to your house?  
 9 A Yes.  
 10 Q Did you pick him up?  
 11 A No. He came to my house.  
 12 Q Did you take him back to his house?  
 13 A No.  
 14 Q Did you prepare lunch for him?  
 15 A No.  
 16 Q Was anyone with you?  
 17 A No.  
 18 Q Was this the episode when Ms. Wytenbach talked to  
 19 you about being late for work?  
 20 A Yes.  
 21 Q Directing your attention to the last time that you  
 22 and the Mayor had sex, whenever that was, first  
 23 question: When was it?  
 24 MR. ARELLANO: Object to the form.  
 25 If she's able to answer it, she should  
 227

1 MR. ARELLANO: Hold on. Do you  
 2 understand the question?  
 3 THE WITNESS: No. I'm just  
 4 trying --  
 5 Q Do you need a few minutes?  
 6 A What I'm trying to do is there was two incidents.  
 7 There was in January and December.  
 8 Q Of what years?  
 9 A 1999.  
 10 Q December of 1998 and January of 19 --  
 11 A No, 1999.  
 12 Q December of 1999 was the last time you had sex with  
 13 the Mayor?  
 14 A Yes, yes. That was the last time.  
 15 Q If you recall, you had an automobile accident in  
 16 December of 1999. Do you recall when that  
 17 automobile accident was?  
 18 A Yes.  
 19 Q When was it?  
 20 A Sometime in mid December.  
 21 Q About December 15th?  
 22 A Around there.  
 23 Q Was the last act of sex with the Mayor before or  
 24 after December 15th?  
 25 MR. ARELLANO: Same objection as to  
 229

1 the last act. What are you talking about,  
2 intercourse or just sexual play? I mean  
3 that's my objection, counsel.  
4 Q When was the last time you and Mayor Norquist had  
5 sexual intercourse?  
6 A That was in November.  
7 Q In November of 1999?  
8 A Yes.  
9 Q Do you recall the date?  
10 A Not right now, no.  
11 Q Do you remember if the Mayor gave you a gift either  
12 before or after the last act of sexual intercourse?  
13 A It was after.  
14 Q Was it the same night?  
15 A No.  
16 Q When was it in relation to the last act of sex,  
17 intercourse?  
18 A Can I explain something?  
19 Q No. Answer my question.  
20 MR. ARELLANO: No, no, no. You can  
21 explain to answer the question whatever you  
22 need to explain.  
23 MR. SCHRIMPF: Well, I want a yes,  
24 no or I don't know. She can explain it --  
25 MR. ARELLANO: Hold on. There is  
230

1 no yes or no to the type of question you're  
2 asking.  
3 Q When was -- did the Mayor give you a gift -- when  
4 did the Mayor give you a gift, if he did, in  
5 relation -- time-wise in relation to the last time  
6 you two had sexual intercourse?  
7 MR. ARELLANO: Assuming that  
8 November 1999 was the last time.  
9 MR. SCHRIMPF: Right.  
10 MR. ARELLANO: When did she receive  
11 a gift after that?  
12 MR. SCHRIMPF: That's right.  
13 A It was mid December.  
14 Q Mid December he gave you a gift?  
15 A Yes.  
16 Q Was it before or after your accident?  
17 A It was after my accident.  
18 Q How soon after your accident?  
19 A Maybe one or two days. I just remember him --  
20 Q How long were you -- were you hospitalized as a  
21 result of the accident?  
22 A I had to go in to get checked, yes.  
23 Q Were you admitted to the hospital? Did you stay  
24 overnight?  
25 A No, no.  
231

1 Q You were discharged the same day?  
2 A Yes.  
3 Q Do you remember when the Mayor stopped by your house  
4 after that?  
5 A All I remember, it was soon after my accident  
6 because he tried to touch me.  
7 Q What part of your body did he try to touch?  
8 A My shoulders. He was trying to touch my shoulders.  
9 Q Did he put his hand on your shoulders?  
10 A He was trying to show that he was concerned.  
11 Q And he gave you a gift?  
12 A Yes. That's where he gave me a peace offering.  
13 Q And what was the peace offering?  
14 A It was a bracelet that he said he knew he has done  
15 wrong by me and that he --  
16 Q All I asked you was what was the peace offering?  
17 A Some kind of bracelet.  
18 (Exhibit No. 6 marked for  
19 identification)  
20 Q Showing you what's been marked as Exhibit No. 6, ask  
21 you if that's a picture of the bracelet he gave you?  
22 A Yes, it is.  
23 Q And you gave that to -- strike that. He gave that  
24 to you by your recollection December 15th of 1999?  
25 MR. ARELLANO: Objection,  
232

1 mischaracterizes her prior testimony as to the  
2 date.  
3 A It was mid December.  
4 Q Sometime mid December?  
5 A Yes.  
6 Q And the Mayor touched you on your shoulder?  
7 A Yes.  
8 Q Did he say anything to you?  
9 A He --  
10 Q I asked you if he said anything to you.  
11 A Yes. I'm going to answer that.  
12 MR. ARELLANO: Hold on. She's  
13 trying to answer, counsel.  
14 MR. SCHRIMPF: I'm trying to be  
15 precise.  
16 Q What did he say to you?  
17 A He said, I know I have done wrong by you. I know  
18 that I need to get help. I know that you're going  
19 to get help. Then he would change, and then he told  
20 me that I know that my phones can't be tapped, not  
21 tapped but recorded. And he made it clear to me  
22 about people he gets upset about or something  
23 happens, cross that he has ways to deal with them.  
24 Q What were the words he used?  
25 A He was making --  
233

1 MR. ARELLANO: Other than what she  
2 just stated on the record?  
3 MR. SCHRIMPF: Yes. I want to know  
4 the words.  
5 A He was -- see, prior to that -- I have to explain to  
6 you prior --  
7 Q No.  
8 MR. ARELLANO: Hold on a second.  
9 You've got to stop talking to my client like  
10 that. Let her answer in her own way.  
11 MR. SCHRIMPF: Counsel, I want her  
12 to answer the question.  
13 MR. ARELLANO: Yes, and she's  
14 trying to answer the question, and you  
15 continue to ask questions and interfere.  
16 Because for some reason you don't like her  
17 approach. But that's the only approach she's  
18 got and we're going to respect that approach  
19 and I ask you to do that. Hold on a second.  
20 Can you go and read the last question  
21 and part of the answer she gave?  
22 (Questions and answer read)  
23 Q What were the words?  
24 MR. ARELLANO: Did you finish your  
25 answer?

234

1 A Now I forgot the question. I'm sorry.  
2 Q What were the words?  
3 MR. ARELLANO: Object to the  
4 question, to the form.  
5 MR. SCHRIMPF: Fine, okay.  
6 Q Please answer the question.  
7 A Can you ask me the question you asked me before?  
8 MR. SCHRIMPF: Hold on a second.  
9 Let's take a break. We have to take a break  
10 anyway because of the tape.  
11 (Recess)  
12 By Mr. Schrimpf: (Continuing)  
13 Q Did Mayor Norquist visit you when you were in the  
14 hospital on December 15th of 1999?  
15 A Yes, he did.  
16 Q And were you with anyone when the Mayor was with  
17 you?  
18 A I was with my brother.  
19 Q Which brother?  
20 A My brother Alvin and my -- can I --  
21 Q Was anyone else with you?  
22 A The nurses. They asked me if I wanted the Mayor  
23 there and I said no. And my brother went outside in  
24 the hallway and told the Mayor not to come in. And  
25 the Mayor pushed one aside from him and came in

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1 anyway.  
2 Q Did the Mayor say anything to you when he saw you?  
3 A He asked how I was feeling. He -- it was just -- I  
4 didn't want him there, so I sort of shut him off. I  
5 was angry that he was there.  
6 Q What did you say to him?  
7 A I was on pain medication and so I just didn't want  
8 him there. I told him, can you please go now, my  
9 brother's here.  
10 Q And did he leave?  
11 A Not right away.  
12 Q How long did he stay?  
13 A Maybe 20 -- my brother walked in to try to get him  
14 out, and then he sort of got a little stern with my  
15 brother, and he seemed to want to ask about my  
16 demeanor, my personal -- the Mayor knew I was going  
17 through a hard time because I was already telling  
18 him and I was crying and pushing him away during  
19 this time. And so he seemed to want to get a clear  
20 understanding of what I was planning to do.  
21 Q What hospital were you at?  
22 A St. Francis. No, St. Luke's, I'm sorry.  
23 Q Do you know what time you arrived at St. Luke's that  
24 day?  
25 A And please forgive me, I have to sort of think

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1 through what happened that day.  
2 Q Well, if you want to think through, that's fine, but  
3 then I want to go off the record while you think it  
4 through.  
5 MR. ARELLANO: No, just answer the  
6 question.  
7 A It's a real short thing. I was going to meetings in  
8 the community and I was hit from behind.  
9 Q My question was what time did you arrive at the  
10 hospital that day?  
11 A It was after lunch.  
12 Q And what time did you leave the hospital that day?  
13 A Later on that evening, that afternoon, the evening.  
14 Q Were you formally discharged from the hospital?  
15 A Yes.  
16 Q Did you ever file a worker's compensation claim as a  
17 result of the accident?  
18 A No.  
19 Q Why not?  
20 A Because while I was sore, I, I worked. I was sore  
21 but I worked.  
22 Q You were headed to a meeting at the time the  
23 accident occurred?  
24 A I was coming out of a meeting.  
25 Q You were coming out of the meeting. Where was the

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1 meeting that you were coming out of?  
 2 A It was with, if I recall and I'm not real sure, I  
 3 thought I was with Ernesto Chacon.  
 4 Q Ernesto Chacon?  
 5 A And maybe Pedro Colon.  
 6 Q And did this meeting have something to do with the  
 7 block grant operation?  
 8 A No. It was more of political meeting.  
 9 Q Did you regard yourself as being on City time at the  
 10 time of the accident?  
 11 A No. It was my lunch hour.  
 12 Q Well, were you on City business at the time of the  
 13 accident?  
 14 A No.  
 15 Q Anyway, you never filed a worker's comp claim?  
 16 A No.  
 17 Q Going back to the request by the Mayor that you  
 18 attend with him the 1996 democratic convention, do  
 19 you know if anyone made hotel reservations for you?  
 20 A No, I don't.  
 21 Q You don't know that at all?  
 22 A No.  
 23 Q Do you know if you ever told anyone in the Mayor's  
 24 office you were not going to go?  
 25 A No.

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1 Q The answer is you didn't tell anyone in the office  
 2 you weren't going to go?  
 3 A The Mayor told me not to.  
 4 Q The Mayor told you not to go?  
 5 A The Mayor told me not to tell anybody.  
 6 Q Oh, the Mayor told you not to tell anyone. Did the  
 7 Mayor -- for the '96 convention did the Mayor give  
 8 you money to make a hotel reservation?  
 9 A There were many excuses, and finally all the excuses  
 10 exhausted and he one day put an envelope like this  
 11 and an Amtrak thing, and he said now you have no  
 12 excuses. I expect to see you there.  
 13 Q I thought that was for the '97 convention, or the  
 14 '97 trip. I'm asking about the '96 trip.  
 15 A The '96 trip? Nobody knew. No, that was different.  
 16 Q Did the Mayor give you money to go to Chicago and  
 17 book a hotel for the '96 convention?  
 18 A No.  
 19 Q Did you make any phone calls to Chicago for purposes  
 20 of making a reservation?  
 21 A No. I used to take my kids on a train to Chicago.  
 22 Q Well, the answer is no, you didn't book any  
 23 reservations by telephone for yourself in Chicago  
 24 for the '96 convention?  
 25 A No.

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1 Q Do you know if anyone else booked reservations for  
 2 you for your trip to Chicago for the '96 democratic  
 3 convention?  
 4 A No, I don't think so. Maybe Ruth. See, staff would  
 5 go to some of those things with the Mayor. I don't  
 6 know if Ruth did or not.  
 7 Q But if anybody would have, Ruth would have?  
 8 A Yes. Ruth is the one that does the scheduling.  
 9 Q For the '96 democratic convention was there any --  
 10 was there any arrangement made by you for travel to  
 11 Chicago?  
 12 A No. I knew I wasn't going to go.  
 13 Q When did you tell anyone you weren't going to go?  
 14 A I didn't tell any of them.  
 15 Q You didn't tell anybody on the staff?  
 16 A No.  
 17 Q You didn't tell the Mayor?  
 18 A No.  
 19 Q You just weren't going to go?  
 20 A He expected me to be there as he expected me to be  
 21 other places.  
 22 Q What did the Mayor say to you for the '96 convention  
 23 that caused you to believe he expected you to be  
 24 there?  
 25 A He told me one evening at work that he had the

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1 plan -- that he had to go and he wanted me to go  
 2 with him.  
 3 Q When did he tell you that?  
 4 A Before that convention.  
 5 Q Did you make a note of that conversation?  
 6 A No. Because I knew I wasn't going to go.  
 7 Q Did you ever make notes of any of the conversations  
 8 you had with the Mayor where you and the Mayor were  
 9 discussing setting up a meeting so that you two  
 10 could have sex?  
 11 A He would have conversations with me, but he wouldn't  
 12 put them that way.  
 13 Q No. My question is did you make notes of any of the  
 14 conversations you had with the Mayor where the  
 15 subject was you two meeting for the purposes of  
 16 having sex?  
 17 A No. He did.  
 18 Q Did you make any tape recordings of any such  
 19 conversations with the Mayor?  
 20 A No.  
 21 Q Did you make any tape recordings of any  
 22 conversations with the Mayor over the phone?  
 23 A No.  
 24 Q Did you make tape recordings of any conversations  
 25 with any of the individuals who so far have been

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1 called as witnesses in this case?  
 2 A No.  
 3 Q Did anyone else make tape recordings of such  
 4 conversations of anyone else involved that has been  
 5 deposed so far in this case that you know of, even  
 6 if it wasn't you personally?  
 7 A No.  
 8 Q In paragraph 15-C of your third amended complaint  
 9 you state, "On at least one occasion Mayor Norquist  
 10 demanded that she obtain intimate apparel to satisfy  
 11 his fantasies."  
 12 A Yes.  
 13 Q Do you remember making that allegation?  
 14 A Yes, I do.  
 15 Q Did you obtain the intimate apparel in question?  
 16 A The Mayor brought a bag into the office.  
 17 Q What was in the bag?  
 18 A It was a negligee.  
 19 Q It was a negligee?  
 20 A Yes. --  
 21 Q Describe the negligee, please.  
 22 A I think it was, I think it was purple, or black and  
 23 it had some panties that are like thongs. And it  
 24 was a type of negligee that seemed to be for someone  
 25 that was comfortable with wearing real sexual stuff

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1 like that.  
 2 Q Are you done?  
 3 A Yes.  
 4 Q Did you ever wear the negligee?  
 5 A No, I didn't.  
 6 Q Do you know where the negligee is today?  
 7 A He has it.  
 8 Q The Mayor has it?  
 9 A Yes.  
 10 Q Did you give it back to him?  
 11 A Yes. I -- can I finish answering?  
 12 MR. ARELLANO: Answer his question.  
 13 A Yes, he has it.  
 14 Q Paragraph 15-C suggests that the Mayor demanded that  
 15 you obtain intimate apparel.  
 16 A Yes.  
 17 Q Did you ever purchase intimate apparel on your own?  
 18 A After the Mayor would get upset because I didn't and  
 19 he would make it clear, I did purchase some, a  
 20 negligee but it wasn't a negligee, it was more like  
 21 a pajama, soft.  
 22 Q Have you ever worn it?  
 23 A No.  
 24 Q Where is it today?  
 25 A He has it.

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1 Q The Mayor has it?  
 2 A I -- I gave him -- can I explain though? I need to  
 3 explain that to you.  
 4 Q Okay.  
 5 A Towards the end of October, November, December --  
 6 Q Of what year?  
 7 A Of '99.  
 8 Q Okay.  
 9 A The Mayor was very mean, mean looking, demanding,  
 10 upset, critical. And so because I wouldn't show up  
 11 to places or I would sneak out, because I tried to  
 12 avoid him in places when the staff were together,  
 13 because I refused Ruth's telling me to go see the  
 14 Mayor, because I refused him closing the door, he  
 15 was beginning to get really angry. And so for  
 16 several occasions he would ask me to buy something  
 17 that was a negligee. When I purchased the negligee,  
 18 he saw it and he didn't like it. And I didn't feel  
 19 comfortable wearing it. And he -- I didn't wear it.  
 20 And he was upset.  
 21 Q When did you purchase it?  
 22 A September, October, November.  
 23 Q September, October, November of '99?  
 24 A Yes.  
 25 Q From where did you purchase it?

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1 A Target.  
 2 Q How did you pay for it?  
 3 A Cash.  
 4 Q Do you have the sales receipt?  
 5 A I've looked for them. I can't find it.  
 6 Q You can't find it at all?  
 7 A But I'm still looking.  
 8 Q And the Mayor has the negligee?  
 9 A He has both of them, yes.  
 10 Q The one he purchased for you and the one that you  
 11 purchased for yourself?  
 12 A Yes.  
 13 Q Were there any other items of intimate apparel that  
 14 you were referring to in paragraph 15-C that we have  
 15 not yet covered?  
 16 A Can I see 15-C?  
 17 Q Sure.  
 18 MR. SCHRIMPF: Let the record  
 19 reflect I'm showing the witness paragraph 15-C  
 20 of the third amended complaint.  
 21 Q Okay. You've seen it?  
 22 A Yes.  
 23 Q Are there any other items of intimate apparel that  
 24 you were referring to?  
 25 A He in his, in the office when he --

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1 MR. ARELLANO: Counsel, I just want  
2 to understand, which complaint are you  
3 referring to?  
4 MR. SCHRIMPF: Oh, third amended  
5 complaint.  
6 MR. ARELLANO: The third amended  
7 complaint.  
8 Q Please continue.  
9 A He had a set of women's sheer underwears that were  
10 very offensive to me.  
11 Q Give me the date that you were shown these items.  
12 A Give you the date?  
13 Q Yes. What's the date you were shown those items?  
14 A It was -- I can't give you the date. I can give you  
15 the month.  
16 Q What was the month?  
17 A I believe it was November.  
18 Q Of what year?  
19 A Of 1999.  
20 Q Where were you when he showed you these items?  
21 A In my home, the second one. The first one he  
22 brought it to the office.  
23 Q Did he show you those items on the occasion of the  
24 last act of sexual intercourse in November of 1999?  
25 A No.

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1 Q When in November of 1999 did he show you those  
2 items?  
3 A Those were his -- I don't -- I don't remember when  
4 he showed me the ones that he bought, but during the  
5 time he kept asking me did you get it, did you get  
6 it, what I was supposed to get.  
7 Q And what you were supposed to get was the negligee  
8 that you've testified to?  
9 A Yes.  
10 Q And then if you were supposed to get something, did  
11 the Mayor tell you why he was showing you these  
12 other items of apparel?  
13 A He didn't say.  
14 Q He said nothing?  
15 A He walked into the office with this  
16 Victoria's Secret bag and told me to take it.  
17 Q And that was the negligee with the thong panties --  
18 A Yes.  
19 Q -- that you've testified to earlier?  
20 A Yes.  
21 Q What were these other items that you've referenced?  
22 A That I gave back to him?  
23 Q Well, I don't know what you did with them, ma'am.  
24 A I gave back to him cards, letters, those two things.  
25 And can I tell you the reason why? Because it's

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1 important.  
2 Q Why?  
3 MR. ARELLANO: Hold on. Just  
4 answer his question.  
5 THE WITNESS: Okay.  
6 MR. SCHRIMPF: Okay.  
7 MR. ARELLANO: Did you understand  
8 the question?  
9 Q When you and Mayor Norquist --  
10 A I'm sorry.  
11 Q When you and Mayor Norquist broke off the sexual  
12 relationship that you had, where were you?  
13 A First of all, it wasn't a relationship. Secondly,  
14 there were many times that I believed that it was  
15 done because he promised, because I was stronger.  
16 So when you say broke it off, I don't understand  
17 what you mean by that.  
18 Q Let me rephrase the question. When was the last  
19 time -- strike that. Between the beginning of  
20 December of 1999 and the date of your automobile  
21 accident, did you and Mayor Norquist have any phone  
22 calls?  
23 A He called me all the time.  
24 Q Well, I'm talking about a phone call where you  
25 actually connected, where you spoke.

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1 A Probably.  
2 Q Do you remember when?  
3 A No.  
4 Q How did the affair come to an end? And I'm using  
5 the word affair and I understand that you may not  
6 agree with that, but how did this series of sex acts  
7 between you end?  
8 A Okay. I need to explain that to you.  
9 Q Okay.  
10 A In 1998 I worked on Pedro Colon's campaign. I  
11 thought Bill Christofferson and the Mayor and  
12 everybody was okay with it. I went and worked hard  
13 and it was a good time that I didn't have to -- I  
14 could easily say no, Mayor, I'm sorry. I didn't  
15 have to answer the calls.  
16 And so then after the fund raiser I felt  
17 stronger. And then I did -- after the campaign.  
18 And then I did a fund raiser for the Mayor because  
19 he was upset that I hadn't done one for him. And so  
20 at that fund raiser he was very touching too much.  
21 And I finally talked to him and I said this has to  
22 end, and I was stronger. And I said I have -- this  
23 have to end. I'm going to help -- I'm going to get  
24 help and I need to talk to someone. And so he --  
25 all of a sudden I didn't understand why, but he was

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1 angry, but he said no one can take my calls. No one  
2 can trace my calls back. I didn't understand what  
3 that meant. Then I realized that that's why I took  
4 the bag of things to him so that I didn't have to,  
5 so he wouldn't have to be worried that I was going  
6 to do something to him. I was afraid of him.  
7 And so when I left that stuff, I believed  
8 November -- I think November, December that I was  
9 going to start a new year fresh and be able to  
10 continue to do the work that I felt good about doing  
11 and he wasn't going to bother me with coming into my  
12 office and changing things that he knew meant a lot  
13 to my community and to me, that I didn't have to  
14 have sex with him in order to do my work. And so  
15 when I left at the end of December, January came and  
16 I took a long time. I prayed on it. I talked to my  
17 family because I was looking for different jobs that  
18 weren't connected to the City. And I have a list of  
19 people that I can tell you that I tried. I had to  
20 make sure they were jobs that weren't going to be  
21 connected to his power.

22 And so I believed when I was going back to  
23 work on 1999 two things: One, that they were going  
24 to give me -- it wasn't a reclassification that I  
25 demanded. They told -- they didn't give me

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1 opportunities to apply. The Mayor and the chief of  
2 staff told me that I would get a reclassification if  
3 I came back. And so when I walked into that office  
4 after my time off, there were two things that  
5 happened. There was an apple on my desk and there  
6 was the list of assignments. And they put me back  
7 into the neighborhood assignments. And so I felt I  
8 have lost control.

9 The staff then, at that time everybody's  
10 office, we're all supposed to step outside and have  
11 like updates. And I was -- I sat in my chair and I  
12 was very emotional. And I didn't want the staff to  
13 see me emotional. So I cleared up and I stood  
14 there. And the Mayor was walking in and I was  
15 walking out. And he asked me stupid questions that  
16 didn't make any sense, but he did it with the smirk  
17 on the face. He knew. He knew why I was upset.  
18 And I realized that that wasn't going to stop.

19 And then after that I went to Bill  
20 Christofferson which I am supposed to go to the  
21 afternoon for the campaign. But it took me half  
22 hour to get myself together because I didn't want  
23 Bill and them to see me upset because this is now a  
24 campaign.

25 We worked a little bit on the campaign and

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1 Bill said he wanted to talk to me. And while I was  
2 on vacation, he said Barb Candy tried calling me,  
3 why didn't I answer, the staff are complaining about  
4 you, what's going on. And I was so emotional that I  
5 couldn't tell him clearly, but I told him that I had  
6 a problem with the Mayor. I didn't get into details  
7 because that was the first time I said that. And I  
8 was so afraid because the Mayor made me believe that  
9 Chief Jones and him knew. And so I had the Mayor of  
10 the city and Chief Jones.

11 Until the other day when I heard Chief Jones I  
12 realized Chief Jones wasn't real aware, but I  
13 understood that he was. And I feared for my life.  
14 I feared for my children. I knew that I was going  
15 to lose my job. I knew that I wasn't going to be  
16 able to pay my mortgage and car and that I would  
17 have to figure out a way to get my son that was  
18 starting Thomas More, that was his dream and that  
19 school. But I was afraid of my job.

20 I tried going, I talked to different people to  
21 try to get a job that wouldn't connect to the Mayor  
22 because everybody knows any job you go to that  
23 there's a connection, he will make sure that you  
24 don't get it and that something happens to you.

25 And so when I broke down, it was because I

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1 believed that the chief and the Mayor were going to  
2 do something to me. I believed --

3 Q Why did you believe that?

4 A Because those two are the most powerful people in  
5 Milwaukee.

6 Q Did anyone tell you they were going to do something  
7 to you?

8 A My ex-husband's father received a call that my  
9 daughter was dead from the police department in  
10 Florida. I had a police detective Howard Subject  
11 come to my home at 11:30 at night asking for my  
12 daughter. My daughter was sleeping. And I went to  
13 check her. He wanted to see her.

14 Q Did anyone else tell you these things?

15 A No. The Howard Subject, the CIB, the detective, so  
16 he came and he told me, he came and he told me that  
17 my ex-husband was calling because his father, who  
18 was his same last name, received a call from the  
19 Milwaukee Police Department that my daughter was  
20 dead and that he had to get to Milwaukee as soon as  
21 possible.

22 Q But that was not a true phone call, was it?

23 A We never know. We never got the investigation.

24 Q There was no harm that came to your daughter, was  
25 there?

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1 A No. There was no harm. But it was during the time  
2 that I was filing my case. And I was terrified and  
3 I was paranoid and I would hear steps on my steps  
4 and I felt something was going to happen.  
5 Q Ma'am, to take you back to the beginning of this for  
6 a second, you said November and December of '98 and  
7 January of '99. Are you sure of those dates?  
8 A I remember --  
9 Q You mentioned --  
10 MR. OLSON: Well, I think there's a  
11 lot of confusion.  
12 MR. SCHRIMPF: Yes.  
13 MR. OLSON: Can we just take a  
14 minute? I think maybe I can help things.  
15 Just go off the record.  
16 MR. SCHRIMPF: Off the record.  
17 (Recess)  
18 By Mr. Schrimpf: (Continuing)  
19 Q Okay, ma'am, when we went off the record I asked you  
20 if you were sure of the dates of November and  
21 December of 1998 and January of 1999. During the  
22 break have you had an opportunity to reflect on  
23 that?  
24 A No. During the break --  
25 Q What are the correct dates?  
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1 A At this point I can't remember, I'm sorry. I can't  
2 remember the dates.  
3 Q Do you remember how many times you had sexual  
4 intercourse?  
5 A Once in 19 -- in November of 1999.  
6 Q Do you remember if it was the beginning of the month  
7 or at the end of the month?  
8 A It was more in -- I would say the end of the month,  
9 not the beginning but at the end of the month.  
10 Q And was it at that time that the Mayor gave you the  
11 item which is reflected in Exhibit No. 6?  
12 MR. ARELLANO: Objection, asked and  
13 answered.  
14 Q Subject to the objection.  
15 A No.  
16 Q When did he give you that, if you remember?  
17 MR. ARELLANO: Objection, asked and  
18 answered.  
19 A In mid December.  
20 Q Oh, okay. In October of 1999 did you and  
21 Mayor Norquist have sexual intercourse?  
22 A Yes.  
23 Q How many times?  
24 A Maybe two.  
25 Q On the same night or event or two different times?  
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1 A Now, can you ask me that question in total? Correct  
2 dates for what?  
3 Q Okay. Directing your attention to the month of  
4 November of 1999, do you have a mental image of that  
5 month?  
6 A Yes.  
7 Q The things that happened that month?  
8 A Yes.  
9 Q As I understand it, you and the Mayor had sexual  
10 intercourse for the last time in late November,  
11 probably November 29th of 1999?  
12 MR. ARELLANO: Objection,  
13 mischaracterization of her prior testimony.  
14 A That's not true.  
15 Q When was the last time you had sex with the Mayor in  
16 November of -- sexual intercourse with the Mayor in  
17 1999?  
18 A It was not at the end. It was the beginning, closer  
19 to the beginning of 1999.  
20 Q Closer to the beginning of 1999?  
21 A It was in -- it wasn't at the end of '99.  
22 Q Let me try it this way. Did you and the Mayor have  
23 sex, sexual intercourse at all in November of 1999?  
24 A Yes.  
25 Q What dates, if you can remember?  
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1 A Two different times.  
2 Q Do you remember the dates?  
3 A I remember one of the dates was a very vicious and  
4 painful event. It was after a Hispanic event.  
5 Q A UMOS event?  
6 A I can't remember if it was UMOS or La Casa. It was  
7 a Hispanic event like that, yes.  
8 Q Do you remember the date of the event?  
9 A I don't remember right now, but I know it was  
10 probably mid -- I don't know, probably mid  
11 October maybe.  
12 Q Was that for purposes of October of 1999 the first  
13 or the second time?  
14 A The second.  
15 Q Was it before or after the event?  
16 A It was after the event.  
17 Q Was it the same evening of the event?  
18 A Yes, it was.  
19 Q Where was the sexual intercourse?  
20 A It was planned somewhere else, and he changed and  
21 said he didn't have a baby-sitter, so it was planned  
22 with a coworker at his house. It was supposed to be  
23 planned after the event that a coworker and I and  
24 him were going to talk. And at the last minute as  
25 he was leaving he said he didn't have a baby-sitter,  
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1 that we should just meet at his house and the  
 2 coworker was going to be there.  
 3 Q Who was the coworker?  
 4 A Kimberly Pratt.  
 5 Q What time were you going to meet -- well, strike  
 6 that. I'm understanding from your testimony there  
 7 was a plan to meet you, the coworker who was  
 8 Kimberly Pratt and the Mayor at someplace other than  
 9 the Mayor's house; is that right?  
 10 A Yes.  
 11 Q What was the place other than the Mayor's house?  
 12 A We were supposed to figure out where -- whether it  
 13 was going to be coffee or whether it was going to be  
 14 drinks. And it was to discuss the problems at the  
 15 office. And we never -- we were supposed to -- we  
 16 probably did, but I don't remember, supposed to meet  
 17 somewhere. But as the Mayor walked out we didn't  
 18 know, he didn't have a -- we were ready to go. He  
 19 changed his mind at the last minute and said he  
 20 couldn't but that he'd rather have us go to his  
 21 house.  
 22 When I got to his house, Kimberly wasn't  
 23 there. And I immediately became nervous and I asked  
 24 where's Kimberly. And he said, well, I thought that  
 25 I would try to -- I thought you and I needed to talk

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1 about my behavior and I needed to apologize to you.  
 2 And I asked him if I could call Kimberly because I  
 3 wanted to be -- I wanted Kimberly to be there. He  
 4 said no. These are things that we have to deal  
 5 with.  
 6 That day, that evening is the day that he  
 7 pinned me on the steps and he had very painful and  
 8 forceful intercourse with me.  
 9 Q Vaginal intercourse?  
 10 A Yes.  
 11 Q Whenever you and the Mayor had intercourse, was it  
 12 any way other than vaginal intercourse?  
 13 A One time he did something to me that I need to tell  
 14 you, which is one other, which is in November.  
 15 Q Well, but for the time being I'm trying to  
 16 concentrate on this event, which I understand is the  
 17 night of a UMOS function --  
 18 A Yes.  
 19 Q -- in approximately October --  
 20 A October.  
 21 Q -- of 1999? And that was the second event of sexual  
 22 intercourse you and the Mayor had in October of  
 23 1999?  
 24 A Yes.  
 25 Q How did the Mayor get to his house?

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1 A I think security.  
 2 Q How did you get to the Mayor's house?  
 3 A With my car, and I was supposed to -- see, I was  
 4 looking for Kimberly's car. And when I walked in, I  
 5 noticed Kimberly -- nobody else was there. And I  
 6 immediately asked her.  
 7 Q Did you and Kimberly talk during the course of the  
 8 UMOS event?  
 9 A Yes. We talked that we were going to get together  
 10 and that she was going to help me explain to him.  
 11 Q What?  
 12 A A discrimination, the way that I was feeling, the  
 13 way that things were going in that office.  
 14 Q Was Kimberly going to talk to the Mayor about sex  
 15 between you and the Mayor?  
 16 A I think she was, it was going to be one of the  
 17 issues that she would talk to him about.  
 18 Q What other issues, if you know, was she going to  
 19 talk to him about?  
 20 A Office procedure discrimination, Mike Soika.  
 21 There's lots of problems in that office.  
 22 Q So she was going to talk about discrimination. What  
 23 kind of discrimination?  
 24 A Racial discrimination and the inner circle and the  
 25 outer circle, the Hispanic box and the black box and

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1 the people that were in the inner circle. She was  
 2 going to get to a point where she was able to say to  
 3 him because they would have conversations about  
 4 how's Marilyn doing, and I confided in Kimberly.  
 5 And so Kimberly was stronger and was going to tell  
 6 him about all of it.  
 7 Q What was she going to tell him about Michael Soika?  
 8 A That he wasn't doing the things that he, that the  
 9 Mayor wanted him to do.  
 10 Q What things was he not doing that the Mayor wanted  
 11 him to do?  
 12 A He was supposed to make that office seem like people  
 13 were equal in that office and that the areas of  
 14 responsibility were spread out so that when one of  
 15 us called a different department head, that they  
 16 didn't go through other people and question our  
 17 judgment and that we were empowered to be able to  
 18 request help from different departments for  
 19 constituents.  
 20 Q Was she going to talk to the Mayor about any other  
 21 problems with Michael Soika?  
 22 A Not that I recall.  
 23 Q Was she going to talk to the Mayor about the sexual  
 24 matters between you and Mayor Norquist?  
 25 A Yes, she was.

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1 Q What was she going to say to the Mayor about that?  
 2 A She was going to be clear that as someone that saw  
 3 me that this needed to stop, that it was unhealthy  
 4 and that I was not doing well.  
 5 Q You had told Kimberly about the sexual matters  
 6 between you and the Mayor?  
 7 A Yes.  
 8 Q Did you tell her about the intercourse?  
 9 A I didn't give her details. I told her how he would  
 10 call me, and I told her how he was forcing me to  
 11 have sex with him.  
 12 Q So she was going to talk to the Mayor about forced  
 13 sex between you and the Mayor?  
 14 A Yes.  
 15 Q What was she going to tell the Mayor?  
 16 A How she saw me because the Mayor would go to her and  
 17 ask her to call me and ask her to find out where I  
 18 was at or he'd ask her questions. And I think he  
 19 wanted to know how much Kimberly knew.  
 20 Q In addition to Kimberly, and I take it we're talking  
 21 about Kimberly Pratt?  
 22 A Uh-huh, yes.  
 23 Q In addition to Kimberly, were there any other people  
 24 in the office who knew that you and the Mayor were  
 25 having sex of any kind, either straight sexual  
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1 A We were in the elevator one time.  
 2 Q Where was this?  
 3 A City Hall. And he never takes the elevator, but we  
 4 took the elevator. There was no one there. He was  
 5 in back of me. And he rubbed his front on my back.  
 6 Q And he what?  
 7 A Rubbed his front on my back.  
 8 Q He was standing behind you?  
 9 A Rubbed his bottom front on my back.  
 10 Q Were you facing the doors of the elevator?  
 11 A Yes.  
 12 Q So he was facing the doors of the elevator?  
 13 A Yes.  
 14 Q And he rubbed his front against your back?  
 15 A Yes.  
 16 Q What part of his body in particular did you feel  
 17 touch you?  
 18 A His, his penis.  
 19 Q Where did his penis touch you?  
 20 A It was my upper back, my upper back.  
 21 Q What kind of clothing was the Mayor wearing?  
 22 A Jeans. No, not jeans. Just regular pants.  
 23 Q Did he have on a sport coat?  
 24 A Yes.  
 25 Q And when you say regular pants, are you talking like  
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1 intercourse or sexual activities, touching of the  
 2 body parts, anything like that?  
 3 A During the last time of my month there  
 4 Michael Miller, I used to ask Michael Miller to  
 5 please not leave my office until the Mayor left.  
 6 Q Did you tell him why?  
 7 A And I would do that so often that he finally asked  
 8 me why.  
 9 Q And what did you tell him?  
 10 A I told him that the Mayor was pursuing me, that I  
 11 didn't know what to do with it.  
 12 Q Did you tell him that you and the Mayor were having  
 13 intercourse?  
 14 A I didn't give him those direct words.  
 15 Q Did you tell him the Mayor was fondling your  
 16 breasts?  
 17 A Yes, I did.  
 18 Q Did you tell him the Mayor was touching your  
 19 shoulder?  
 20 A Yes, I did.  
 21 Q Did the Mayor ever touch any other parts of your  
 22 body other than your shoulder or your breasts or try  
 23 to kiss you?  
 24 A Yes.  
 25 Q What parts of your body did he touch?  
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1 slacks?  
 2 A Yes.  
 3 Q They weren't particularly tight, were they, like  
 4 blue jeans?  
 5 A No, they weren't.  
 6 Q And you were able to feel his penis against your  
 7 back?  
 8 A Yes.  
 9 Q Did you believe his penis was erect?  
 10 A Yes.  
 11 Q Was anyone else in the elevator?  
 12 A No.  
 13 Q Where did you get on -- this is at City Hall?  
 14 A City Hall on the second floor all the way --  
 15 Q What floor did you get on?  
 16 A The second floor where the Mayor's office was at.  
 17 Q What floor were you going to?  
 18 A To the first floor which was strange because he  
 19 never took the elevator.  
 20 Q When was this event?  
 21 A It was probably October.  
 22 Q Of 1999?  
 23 A Yes.  
 24 Q Was anyone else on the elevator?  
 25 A No.  
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1 Q Why did you take the elevator?  
 2 A Because we were going -- I was staffing him to an  
 3 event.  
 4 Q What event?  
 5 A What event was it? There was so many events I don't  
 6 remember.  
 7 Q Do you remember if it was at the beginning of the  
 8 month or the end of the month?  
 9 A Not at this point, no.  
 10 Q When you got on the elevator, was anyone else on the  
 11 second floor that saw you enter the elevator?  
 12 A Yes.  
 13 Q Do you know who?  
 14 A The lady that supervises the Common Council people.  
 15 Q I didn't know anybody supervises the Common Council.  
 16 A She does their administrative work,  
 17 African-American.  
 18 Q Does she work for the Common Council?  
 19 A Yes.  
 20 Q And she supervises the Common Council?  
 21 A She does the clerical I think payroll stuff.  
 22 Q You don't know her name, do you?  
 23 A I can't think of her name but I --  
 24 Q But she does the payroll function for the Common  
 25 Council?

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1 A She helps out the aldermen, yes.  
 2 Q Do you know of anyone that was on the first floor  
 3 that you recognized when you got off on the first  
 4 floor? Did you get off -- I should ask you. Did  
 5 you get off on the first floor?  
 6 A Yes, we did.  
 7 Q Was anyone there when you got off on the first floor  
 8 that you remember?  
 9 A I think there was a -- there's a lot of different  
 10 people.  
 11 Q There was what?  
 12 A A lot of different people.  
 13 Q Anyone that you recognize though?  
 14 A From the community? I mean from the work that I  
 15 did.  
 16 Q Do you know names?  
 17 A No, not offhand.  
 18 Q The worker from the Common Council that you  
 19 recognized, was this person African-American,  
 20 Hispanic, Caucasian?  
 21 A African-American.  
 22 Q African-American.  
 23 A Carolyn Hill, I think it's Carolyn Hill Robertson.  
 24 Q The deputy city clerk?  
 25 A Yes.

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1 Q And she was the one who was on the second floor?  
 2 A Yes.  
 3 Q Do you know of anyone the Mayor has ever hurt  
 4 physically?  
 5 A I don't know his private life. I know he yells at  
 6 people a lot.  
 7 Q Well, I'm talking about physically hurting them.  
 8 A I wouldn't know.  
 9 Q When you worked for the Mayor, and I'm directing  
 10 this to 1999, how many fund raisers did you work on  
 11 for the Mayor?  
 12 A I worked on a fund raiser for the Mayor in  
 13 January of nineteen eight I thought -- nineteen  
 14 eight.  
 15 Q Did you mean 1998?  
 16 A Yes. I mean I'm sorry, 1998.  
 17 Q Which fund raiser was that?  
 18 A That was that mayor's fund raiser at  
 19 Tres Hermanos.  
 20 Q At where?  
 21 A It's a Mexican restaurant.  
 22 Q And that was the name again?  
 23 A TRES HERMANOS.  
 24 Q Do you know where this is located?  
 25 A On South 13th Street.

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1 Q And what?  
 2 A And Lincoln.  
 3 Q Okay. Any other fund raiser that you worked on for  
 4 the Mayor in 1998?  
 5 A I worked on an African-American fund raiser.  
 6 Q Did you work with anyone on that fund raiser?  
 7 A Yes. With Michael Miller, Gerald Jones,  
 8 William Clay.  
 9 Q Did Florence Dukes help out in that fund raiser?  
 10 A Not that I recall. She may have been asked to give  
 11 money, but she didn't help plan it.  
 12 Q Where was that fund raiser?  
 13 A On South 2nd Street, which is where Gerald Jones has  
 14 like a big parking, or big yard and then a parking  
 15 lot. And that's where we had it.  
 16 Q What season of the year was this fund raiser?  
 17 A Must have been warm because we did a picnic. I mean  
 18 we ordered a tent.  
 19 Q You ordered a tent for the fund raiser?  
 20 A They did.  
 21 Q Did you work on any fund raisers for the Mayor in  
 22 1999?  
 23 A They wanted me to. No, I didn't. I worked on the  
 24 fund raiser that I did was the Tres Hermanos fund  
 25 raiser.

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1 Q The which?	1 MR. SCHRIMPF: The first time.
2 A The Hispanic fund raiser.	2 A I think he took a bike. He brought his bike.
3 Q Oh, okay. And you didn't do any others during 1999?	3 Q Was it --
4 A They would ask us to go to them but --	4 A In October.
5 Q No, I mean work on one.	5 Q Was it warm weather?
6 A Not that I recall.	6 A It wasn't real warm weather, but it was warm, I
7 Q When you went to a fund raiser, were you given	7 guess enough for him to ride a bike.
8 complimentary entrance, or did you pay like anyone	8 Q How was the Mayor dressed?
9 else?	9 A In soft clothes, you know. It was clothes that
10 A I didn't pay. I was working at the doors.	10 weren't -- they weren't business clothes.
11 Q Oh, I see. To take people's names and collect the	11 Q It was like a warm-up suit or a jogging suit? Or
12 checks and that kind of thing?	12 did he have shorts?
13 A Yes.	13 A He didn't have shorts. It was either a big pair of
14 Q How many people like you were there who were doing	14 jeans or a jogging suit or just sweatpants.
15 this work at the door and getting the checks and	15 Q Did he have a shirt on?
16 recording people's names? Was it you alone or were	16 A Yes.
17 there other people?	17 Q What time of day did he ride over to your house? Or
18 A Oh, no. There was perhaps eight of us.	18 I should say night.
19 Q And were you all employees of the Mayor's office?	19 A No. It was during the day.
20 A Yes.	20 Q Was it in the morning or in the afternoon or the
21 Q Let's go back to the first episode of sexual	21 evening?
22 intercourse between you and the Mayor in October of	22 A I would say it was in the morning.
23 1999. Do you recall when it was?	23 Q Had you taken your children to school?
24 A Yes.	24 A Yes.
25 Q When was it?	25 Q So you were home alone?
270	272
1 A The first time was September, October. It was	1 A Yes.
2 around September, October. What date is this are	2 Q No one else was with you?
3 you talking about?	3 A No.
4 Q It was my understanding that in October of 1999 you	4 Q The Mayor came to the door?
5 and the Mayor had sexual intercourse on two	5 A Yes.
6 occasions. The second one was the night of the UMOS	6 Q How did the Mayor get into your house?
7 banquet?	7 A He rang my doorbell.
8 A Yes.	8 Q This was at Pine Street?
9 Q When was the first one?	9 A Yes.
10 A October -- what's the date on -- I'm sorry, what's	10 Q And just so that I'm clear, this is the lower part
11 the date?	11 of the Pine Street address?
12 Q October of 1999.	12 A Yes.
13 A Probably would have been my house.	13 Q As opposed to the upper?
14 Q I'm asking for the date.	14 A Yes.
15 A I can't give you dates right now.	15 Q Is it possible to get to the upper from the outside
16 Q Was it before the UMOS banquet?	16 without going into the house itself?
17 A Yes.	17 A Yes.
18 Q And you said it was at your house?	18 Q And why did you let the Mayor in?
19 A Yes.	19 A Because what date is this again? I'm sorry.
20 Q How did the Mayor get to your house?	20 Q This is the first time that you and the Mayor had
21 MR. ARELLANO: What date?	21 sexual intercourse in October of 1999.
22 MR. SCHRIMPF: I'm asking. She	22 A He came, and because of November he came in -- he
23 doesn't seem to know.	23 came to talk about taking steps to stop what he was
24 MR. ARELLANO: Are you talking	24 doing.
25 about the first time, the second time?	25 Q Did he tell you that he was coming there for the
271	273

1 purpose of stopping the sex between you?  
 2 A Yes. Because I had already gone -- I have been  
 3 stronger at -- now that Pedro Colon was going to be  
 4 an elected official, I did the fund raiser that,  
 5 that they all in his office thought I couldn't do.  
 6 I realized that now I can pull away from him. He  
 7 didn't have to ask me for sex and I was able to be  
 8 stronger. And I felt stronger to be able to say no,  
 9 this isn't going to happen.  
 10 Q And so you were going to tell the Mayor this was not  
 11 going to happen again?  
 12 A Yes.  
 13 Q Did the Mayor know that was the purpose of his  
 14 coming to your house on this occasion?  
 15 A That was his excuse for coming to my house to clear  
 16 the air.  
 17 Q Oh. So did you and the Mayor talk before he arrived  
 18 at your house so that you knew he was coming and you  
 19 knew what the agenda was going to be?  
 20 A Yes.  
 21 Q When did you talk?  
 22 A Throughout the, probably throughout the day, the  
 23 days before this.  
 24 Q Was this in the office or by telephone?  
 25 A This was in the office.

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1 Q You and the Mayor were talking in the office about  
 2 the fact that the sex that was occurring had to end?  
 3 A Yes.  
 4 Q On the occasion of the first time that you and the  
 5 Mayor had sex in October of 1999 did either one of  
 6 you deal with gifts, either giving them, turning  
 7 them back, exchanging them?  
 8 A Gifts from the Mayor?  
 9 Q Or you. Either one.  
 10 A And what time?  
 11 Q The time of the first sexual intercourse in  
 12 October of 1999.  
 13 A No.  
 14 Q Was gifts at all discussed while you were having  
 15 this discussion?  
 16 A No.  
 17 Q Either in the office or at your house?  
 18 A No.  
 19 Q So it's my understanding, and please correct me if  
 20 I'm wrong, that you were expecting the Mayor the  
 21 morning that you were going -- that you wound up  
 22 having sexual intercourse the first time in  
 23 October of 1999?  
 24 A Yes.  
 25 Q It was not a surprise that the Mayor was there on

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1 his bicycle?  
 2 A I remember seeing his bicycle, that he put in the  
 3 back, yes.  
 4 Q But it wasn't a surprise that he was there?  
 5 A No.  
 6 Q You were expecting him?  
 7 A We were going to make it very clear that things were  
 8 over and that it wasn't going to continue and that I  
 9 was going to get help and that I was going to tell  
 10 someone.  
 11 Q And the Mayor knew this?  
 12 MR. ARELLANO: Hold on a second,  
 13 let her finish.  
 14 Q Were you done?  
 15 A I felt, I felt strong.  
 16 Q You've said that.  
 17 A To be able -- to be able to, to say that this was  
 18 wrong, that this hurted my job, that I don't want  
 19 this to happen no more, that he had promised it  
 20 wasn't going to happen no more, that every time he  
 21 promises he always -- after time passes that he  
 22 always comes back to it, and then he would call and  
 23 call and stop by and schedule stuff. At the end,  
 24 after my stuff was in the morning he would schedule  
 25 them at the end.

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1 They started to give me more weekend duties.  
 2 Weekend duties that staff have to do is where  
 3 they're every Saturday and every Sunday you have to  
 4 be available for the Mayor all day and all night and  
 5 on Friday nights. All of a sudden I saw a paper  
 6 that said I had to be, everybody had weekend duty  
 7 every once in two months.  
 8 MR. ARELLANO: Marilyn.  
 9 THE WITNESS: I'm sorry.  
 10 MR. ARELLANO: Just limit your  
 11 answer to his question.  
 12 MR. SCHRIMPF: I think even counsel  
 13 agrees that this is not particularly  
 14 responsive.  
 15 THE WITNESS: I'm sorry.  
 16 Q Now I lost my train of thought.  
 17 A But he was supposed to talk to me about that.  
 18 That's what he was going to talk to me about when he  
 19 came to my house.  
 20 Q Was he going to talk to you about the fact that you  
 21 did not get Brenda Wood's job?  
 22 A No. That was, that was past. That was --  
 23 Q Was he going to talk to you about the  
 24 reclassification of the vacant position to a nine?  
 25 A Yes. He explained Mike Dawson's situation at one

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1 time.  
 2 Q No, on the occasion that the Mayor came to your  
 3 house on the bicycle in the morning in October of  
 4 1999, were you and the Mayor going to talk about the  
 5 reclassification of the vacant staff assistant  
 6 position?  
 7 A That was part of a clear conversation we were  
 8 supposed to have.  
 9 Q That was part of it, or was going to be part of the  
 10 conversation?  
 11 A Yes.  
 12 Q Did you in fact discuss the reclassification of that  
 13 position when the Mayor arrived?  
 14 A Yes.  
 15 Q What did he say?  
 16 A He explained Mike Dawson years ago had the same  
 17 problem. They miss -- they forgot to -- they gave  
 18 it to somebody else and she was, felt she was more  
 19 qualified. And so the way he dealt with that is  
 20 that-- and we talked about the Hispanic and black  
 21 and constituent boxes that they had us in. And he  
 22 said, I don't want that to happen. You've worked  
 23 hard enough. I want you to be able to get a  
 24 reclassification just like Mike Dawson got. And  
 25 that's when I had to make a decision to go back.

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1 Q Why did you have to make a decision to go back?  
 2 A Because I had -- there was many reasons. One, I had  
 3 lunch with Mike Morgan, who was the Department of  
 4 City Development, and Eimer Tangen who was an  
 5 attorney and they told me I have to go back.  
 6 Otherwise there was nowhere you can go that the  
 7 Mayor couldn't hurt.  
 8 Q Well, when you talked to Mr. Morgan and  
 9 Mr. Tangen --  
 10 A It was lunch.  
 11 Q Yes, I know that. That's what's recorded in the  
 12 article anyway.  
 13 A Oh.  
 14 Q That you had lunch?  
 15 A Yes.  
 16 Q Did you tell Mr. Morgan about the sex between you  
 17 and the Mayor, any kind of sex?  
 18 A No.  
 19 Q Did you tell Mr. Tangen about the sex between you  
 20 and the Mayor, any kind of sex?  
 21 A I couldn't.  
 22 Q Why couldn't you?  
 23 A Because they were telling me to go back to work, and  
 24 they did not have any power in themselves to protect  
 25 me from the Mayor or the chief of police if I were

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1 to report the sexual harassment stuff.  
 2 Q Did you tell Mr. Morgan or Mr. Tangen at any time  
 3 about sexual harassment that you felt was occurring  
 4 by the hands of the Mayor?  
 5 A I told Michael Morgan that the Mayor made me very,  
 6 very uncomfortable as a woman.  
 7 Q Those were your exact words?  
 8 A Yes.  
 9 Q And you didn't say anything about sex that was  
 10 occurring?  
 11 A I was afraid to say that word.  
 12 MR. ARELLANO: Where are we,  
 13 counsel, as far as time?  
 14 (Discussion off the record)  
 15 Q So you and the Mayor on this first time that you had  
 16 sex in October of 1999 -- sexual intercourse in  
 17 October of 1999 were going to talk about ending the  
 18 sex?  
 19 A Yes.  
 20 Q The reclassification of the position?  
 21 A Which wasn't the first time, both of those.  
 22 Q The reclassification of the position?  
 23 A Yes.  
 24 Q What else were you going to talk about? The  
 25 Hispanic box?

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1 A Not so much the Hispanic box but the problems in  
 2 that office.  
 3 Q And the problems in the office were with  
 4 Michael Soika?  
 5 A It was this inner circle of people that were  
 6 non-white and different than people like me and  
 7 Mike Dawson -- and Mike Miller and Roland Perry,  
 8 which happened to be people of color.  
 9 Q Mr. Perry was African-American?  
 10 A Yes.  
 11 Q Mr. Miller was African-American?  
 12 A Yes.  
 13 Q You of course were Hispanic?  
 14 A And there was only a group of individuals that only  
 15 met and discussed issues that pertained to --  
 16 important issues. But the ones that had to go out  
 17 and fight the issues that we had no clue of were the  
 18 black and the Latino and people without having  
 19 knowledge of the actual issues. We only heard about  
 20 it. It was in the paper.  
 21 Q And you regarded yourself as Latino?  
 22 A Well, definitely.  
 23 Q And that was because your parents were originally  
 24 from Puerto Rico?  
 25 A Definitely.

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1 Q When you were at the UMOS banquet --  
 2 A Yes.  
 3 Q -- did you have occasion to talk to the Mayor during  
 4 the course of the banquet?  
 5 A Yes. I think I put together a speech for him, but I  
 6 tried to stay away from him, that and other events.  
 7 Q Did he come -- did you come close to him that night?  
 8 A Yes, not very close, very professionally close. I  
 9 talked to him about where he was on the schedule.  
 10 Q So you were closer to him than you and I are right  
 11 now?  
 12 A Yes. I had to whisper in his ear.  
 13 Q Physically, okay. Did the Mayor let you know that  
 14 he knew what you and Kimberly were intending to talk  
 15 to him about?  
 16 A He told Kimberly, he said, yeah, I understand  
 17 Kimberly and you are going to, we're going to talk  
 18 about some issues, yes.  
 19 Q After the UMOS banquet did you and Kimberly ever  
 20 talk about where she went because she didn't show  
 21 up?  
 22 A I wanted to call Kimberly from the Mayor's office.  
 23 He -- she was sort of on hold and she was going to  
 24 go to the Mayor's office -- the Mayor's house.  
 25 Q No. After the UMOS banquet --  
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1 A Yes.  
 2 Q -- and after the night that you had sex with the  
 3 Mayor that night, did you and Kimberly Pratt ever  
 4 talk about where she went that night since she  
 5 wasn't at the house?  
 6 A She waited for the phone call.  
 7 Q She was supposed to be called?  
 8 A Yes.  
 9 Q I thought she was at the banquet.  
 10 A No, she wasn't.  
 11 Q It was my understanding a few minutes ago that she  
 12 was at the banquet, so that's an incorrect  
 13 understanding?  
 14 A It's incorrect.  
 15 Q You and the Mayor were at the banquet?  
 16 A Yes.  
 17 Q And Kimberly was not?  
 18 A Right.  
 19 Q And somebody was going to call Kimberly to go to the  
 20 Mayor's house?  
 21 A Yes.  
 22 Q Who was going to call Kimberly to go to the Mayor's  
 23 house?  
 24 A The Mayor.  
 25 Q The Mayor was going to do it?  
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1 A And that changed because he changed his story right  
 2 after, right before we were leaving he said, we were  
 3 supposed to go somewhere safe and, you know, and out  
 4 of being alone. We wanted to talk about the office.  
 5 Q You were going to discuss these things at some place  
 6 other than a private location?  
 7 A Somewhere public someplace either for coffee or for  
 8 drinks, yes.  
 9 Q Had a location been selected by anyone?  
 10 A They talked about a couple of places that I wasn't  
 11 aware of, but I think that the coffee house was  
 12 mentioned.  
 13 Q Where is the coffee house?  
 14 A On I think it's, is it Farwell or Brady? It's on  
 15 the east side.  
 16 Q What other locations?  
 17 A I think we talked about the Windham.  
 18 Q That's across from City Hall?  
 19 A Uh-huh.  
 20 Q Any other locations?  
 21 A I don't remember. I know they talked about,  
 22 Kimberly and the Mayor talked about a couple of  
 23 places.  
 24 Q What time did the UMOS banquet end?  
 25 A The UMOS banquet ends late, but the Mayor was just  
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1 walking through the UMOS banquet. So we knew that  
 2 Q So he wasn't going to stay for dinner?  
 3 A No.  
 4 Q So you were going to meet earlier in the evening?  
 5 A Yes. And --  
 6 Q What time did you arrive at the Mayor's house that  
 7 night?  
 8 A I'm not sure. It was about maybe six, 6:30,  
 9 7 o'clock. It wasn't -- the receptionist I think  
 10 started -- the reception started either at 4:30 or  
 11 5 o'clock. He did the reception. And he had told  
 12 us that that's what he was going to do. So it would  
 13 give us time to have at least half hour to just talk  
 14 about all the problems that the staff was having.  
 15 Q Prior to October of 1999 did you and Mayor Norquist  
 16 have sex during 1999? Do you follow me? In other  
 17 words, I'm talking now about the time period before  
 18 October but after January of 1999. Did you two have  
 19 sex, I'm talking about sexual intercourse, at any  
 20 time during the months of January through the end of  
 21 September?  
 22 MR. ARELLANO: Of what year?  
 23 MR. SCHRIMPF: '99.  
 24 A I think, I think maybe once or twice, but it was way  
 25 at the beginning of the year.  
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Case Compress

1 Q So it would have been in January or February or  
2 March of 1999?  
3 A Yes.  
4 Q Once or twice?  
5 A I can't -- I'm clashing all the years together.  
6 Q Do you know, do you remember where you had sex in  
7 1999 prior to October? I'm talking about sexual  
8 intercourse.  
9 A Probably would have been his house or my house.  
10 Q Any other location?  
11 A No. ---  
12 Q Nothing in Chicago?  
13 A We had that one encounter in Chicago, but I don't  
14 remember, right now I can't tell you what day it  
15 was.  
16 Q Can you remember the month or months that you had  
17 sexual intercourse in 1999 prior to October?  
18 A Of '99? I left the office on March of 19 -- I  
19 walked out of my office on March of 1999.  
20 Q Okay. And why was that?  
21 A I had a nephew that was killed.  
22 Q Where was he?  
23 A In Milwaukee.  
24 Q How did he get killed?  
25 A Someone shot him.

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1 Q So you never interviewed for that position?  
2 A They wouldn't allow me to interview.  
3 Q Was there any application process that anybody ever  
4 filled out for these positions?  
5 A There was never applications processes in that  
6 office.  
7 Q Right. For no position; is that correct?  
8 A No.  
9 Q When did you find out that Brenda Wood got the  
10 position?  
11 A After I had spoken to Jim Rowen on several  
12 occasions, Jim then got fired. And Jim had lunch  
13 with me and said that a decision -- that one of the  
14 things he regrets is not allowing me to apply for  
15 that position because I was the most qualified.  
16 Q Mr. Rowen said you were the most qualified?  
17 A Yes. And he actually -- and he said that the  
18 decision came from above, it wasn't his decision.  
19 When I heard that, I realized that the Mayor was  
20 retaliating because I broke, and I was strong in  
21 1998.  
22 Q Now I want to make sure, do you know when  
23 Brenda Wood's position -- strike that -- when  
24 Michal Dawson left her position and when it was  
25 filled?

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1 Q There was a police investigation of this to your  
2 knowledge?  
3 A Yes.  
4 Q Okay.  
5 A And I had left and I remember speaking to different  
6 people. And that's where this is -- '99?  
7 Q Yes.  
8 A I'm getting the months confused. I'm sorry. If I  
9 were to look at --  
10 MR. ARELLANO: Don't guess. If you  
11 don't remember --  
12 Q If you don't know, don't guess.  
13 A I don't know.  
14 Q Now in March of 1999, as I understand it,  
15 Brenda Wood was given Michal Dawson's position; is  
16 that correct?  
17 A That's correct.  
18 Q And that was a position that you wanted to get?  
19 A I wanted to apply for the position, yes.  
20 Q And did anyone ever interview you for that position?  
21 A They would not allow me to interview for the  
22 position.  
23 Q Did Mr. Rowen ever interview you for that position?  
24 A They wouldn't -- he would not allow me to interview  
25 for that position.

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1 A No, I don't.  
2 Q Was there a point in time in 1999 when you no longer  
3 saw Michal Dawson working in the office?  
4 A Yes.  
5 Q When?  
6 A I think most of that year. I'm not sure.  
7 Q And did you see -- now Michal Dawson's office as I  
8 understand it was right next to yours?  
9 A Yes.  
10 Q And so if you and Ms. Dawson were working in the  
11 office, you would naturally see each other during  
12 the course of a given workday; right?  
13 A Yes.  
14 Q And if Brenda Wood was replacing Michal Dawson, you  
15 would see Brenda Wood in Michal Dawson's office I  
16 assume; is that correct?  
17 A It took awhile for her to move in there, yes.  
18 Q But it occurred in 1999?  
19 A I thought it occurred in 1998.  
20 Q It occurred in 1998. And you're telling me you  
21 didn't know that Brenda Wood replaced Michal Dawson  
22 until you had lunch with Jim Rowen?  
23 A No, that's not what I'm telling you.  
24 Q Okay. Please correct me.  
25 A I'm telling you that Brenda, when I tried to apply

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1 for that position --  
 2 Q In '98?  
 3 A In '98. After I had already been very clear with  
 4 the Mayor that I was strong enough to stop, that I  
 5 was going to get help, that he needed to stop and  
 6 that I was going to tell someone, I wasn't sure who  
 7 but I was going to tell someone, and that the work  
 8 that I was trying to do in that office could not do  
 9 it every time he would walk into my office and do  
 10 his sexual things and every time he would call my  
 11 office and every time he would ask someone to come  
 12 to my office and every time he would stop by my  
 13 house and every time he would call, and he knew that  
 14 I was getting stronger. And so then this position  
 15 came up.  
 16 Q Which position?  
 17 A The Brenda, the position that Brenda eventually got.  
 18 Q Mike Dawson's position?  
 19 A Yes. And so I left -- I asked to be interviewed.  
 20 Jim Rowen didn't interview me. And then later on he  
 21 told me that the position, that the Mayor had made  
 22 the decision that that decision came from above.  
 23 Q Did he say what he meant by from above?  
 24 A The only one above Jim Rowen is the Mayor.  
 25 Q What about the Common Council?

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1 A No. It didn't go that far because I got a call from  
 2 Kalwitz's assistant who told me that Tricia Geraghty  
 3 actually got the position.  
 4 Q Who was Kalwitz's assistant that called you?  
 5 A Dawn Monreal.  
 6 Q And when did she call you?  
 7 A When Tricia Geraghty, they turned the papers over to  
 8 -- I guess that's who they give it to for the  
 9 reclassification.  
 10 Q Well, now wait a minute. Tricia Geraghty was hired  
 11 into a reclassified position as I understand it in  
 12 November of 1999; is that your understanding?  
 13 A I understand that they were working on  
 14 reclassification of my position.  
 15 Q But you knew that Tricia Geraghty was hired into a  
 16 reclassified position --  
 17 A No.  
 18 Q -- in November of '99?  
 19 A I found out after it was already done when it went  
 20 to the Council president for approval.  
 21 Q Well, it would have been passed by the Common  
 22 Council; is that correct?  
 23 A Yes.  
 24 Q Because the position had to be reclassified and that  
 25 takes Common Council action; is that correct?

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1 A Yes.  
 2 Q And so whenever it was, you found out about it when  
 3 that action was done; is that correct?  
 4 A Correct.  
 5 Q And that was the position that ultimately involved  
 6 Ms. Geraghty; correct?  
 7 A Well, it was that position that was ultimately  
 8 involved with Patricia Geraghty was the position  
 9 that when the Mayor came to my house with the police  
 10 outside promised to reclassify me and gave me the  
 11 example of Mike Dawson, that he was going to take me  
 12 off the Hispanic box.  
 13 Q When did the Mayor come to your house with the  
 14 police outside?  
 15 A It had to have been in, after March of '98 because  
 16 that whole '98 and '99 they were going through the  
 17 process of evaluating my position and emails were  
 18 sent back and forth to try to get my  
 19 reclassification done.  
 20 Q You're sure that it was after March of 1998?  
 21 A Yes. Because I had left and the Mayor came with a  
 22 police officer to my home, Bob Connelly.  
 23 Q Bob Connelly?  
 24 A Yes.  
 25 Q And the Mayor talked about the position that

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1 ultimately went to Geraghty?  
 2 A Yeah. He said this has happened before. I can make  
 3 this happen. I will make sure that you're  
 4 reclassified with areas of responsibility. That  
 5 meant something.  
 6 Q And the Mayor came to your house in the City, in his  
 7 official car?  
 8 A Yes.  
 9 Q Driven by a police officer?  
 10 A I asked him to have the police officer come in.  
 11 Q And the police officer came in?  
 12 A He wouldn't allow the police officer to come in.  
 13 Q Oh, you -- I'm sorry. You asked the Mayor to have  
 14 the police officer come in?  
 15 A Yes.  
 16 Q And the Mayor wouldn't let that happen?  
 17 A Yes.  
 18 Q And this was after March of 1998?  
 19 A I have to guess that it was after March of 1998,  
 20 yes.  
 21 Q Was it before January of 1999?  
 22 A I believe so, but I would have to look at papers.  
 23 Q When you were -- you said you walked out of the  
 24 office during that period of time?  
 25 A Yes.

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1 Q When exactly in 1998 did you walk out of the office?  
 2 A When I was told by Jim Rowen that the only reason I  
 3 didn't get this position was because the decision  
 4 came from above, which to me meant the Mayor, and  
 5 when they thought that I was too good to work -- to  
 6 lose me in the Hispanic box.  
 7 Q How many times did you and Mr. Rowen have lunch?  
 8 A I think maybe two or three times.  
 9 Q Do you remember when you and Mr. Rowen would have  
 10 lunch?  
 11 A We were supposed to have lunch before this all  
 12 happened, before he left.  
 13 Q Did you have lunch before he left?  
 14 A I don't remember. He had lunch, we had lunch with  
 15 him after all of this.  
 16 Q And is that when he told you about it came from  
 17 above?  
 18 A He was -- yeah. He said, if there's one thing I  
 19 regret, it's not giving you the reclassification  
 20 that you deserved. But please understand that that  
 21 decision came from above.  
 22 Q I want you to think about this very carefully. Are  
 23 the words that you just gave me regarding that lunch  
 24 the exact words that Mr. Rowen used during that  
 25 lunch?

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1 A Those are some of the words he used exactly during  
 2 that lunch, yes.  
 3 Q Did he use any other words during that lunch?  
 4 A Yes.  
 5 Q What were those words?  
 6 A He complained about the Mayor and how he works on  
 7 stuff.  
 8 Q Did anyone ever offer you the position of assistant  
 9 or deputy director of the Department of  
 10 Administration?  
 11 A The block grants?  
 12 Q Different from the block grant. Did anyone ever  
 13 offer you that position?  
 14 A After I found out the Mayor knew that I filed, was  
 15 filing an EEOC claim, I got a call from Mike Soika  
 16 who asked me what do you want. I didn't have a  
 17 lawyer, and I said to him I'm not sure what I'm  
 18 going to do. And he said, well, you know after the  
 19 election we can give you Juanita Hawkins' job, a job  
 20 at Department of Administration.  
 21 Q Do you know how much that job pays?  
 22 A No. But I know that that easily could have -- I  
 23 could have been fired after the election.  
 24 Q What was different about Juanita Hawkins' job in  
 25 terms of being fired and the job that you had in

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1 terms of being fired?  
 2 A Juanita Hawkins had been in that -- first of all,  
 3 she has lots of degrees, very intelligent woman,  
 4 technical, knew block grants for 30 years, if not  
 5 more, knew the details of the block grants. Anybody  
 6 that knows me knows that there's no way I could do  
 7 that kind of work. I could sit and talk about what  
 8 kind of positions or why they took positions, but I  
 9 could not do the intricate work that that position  
 10 needed. Anybody who knows me in that office and in  
 11 City government knew that I could not do that kind  
 12 of work.  
 13 Q Ma'am, isn't it a fact that the director of the  
 14 Department of Administration and the deputy director  
 15 of the Department of Administration both serve at  
 16 the pleasure of the Mayor?  
 17 A Yes, it is.  
 18 Q They can be fired at any time for any reason; isn't  
 19 that right?  
 20 A They didn't file EEOC claims against the Mayor.  
 21 Q I understand that. But they could be fired anytime  
 22 any reason; is that correct?  
 23 A That is correct.  
 24 Q And as a staff assistant to the Mayor, you could be  
 25 fired at any time for any reason; is that correct?

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1 A That's correct.  
 2 MR. SCHRIMPF: I think lunch is  
 3 here.  
 4 (Discussion off the record)  
 5 (Recess for lunch and conference  
 6 with the judge)  
 7 By Mr. Schrimpf: (Continuing).  
 8 Q Ma'am, so that I can get myself re-established in  
 9 the record again, between or during the year 1998  
 10 how many times did you and Mayor Norquist have  
 11 sexual intercourse?  
 12 A Maybe two.  
 13 Q Do you recollect when those episodes occurred?  
 14 A I don't -- I don't remember.  
 15 Q You don't remember? You have no recollection at  
 16 all?  
 17 A I tried to -- I tried to figure it out. I know  
 18 that --  
 19 Q When did you try to figure it out?  
 20 A When I was looking at my places of where I lived and  
 21 incidents that were going on.  
 22 Q Did you try to figure it out from copies of the  
 23 Mayor's calendar that has recently been delivered to  
 24 your lawyers?  
 25 A I haven't really looked at that, in those calendars.

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1 But I know that I had the fund raiser that I did for  
 2 the Mayor.  
 3 Q In '98?  
 4 A And I was working on Pedro Colon's campaign.  
 5 Q In '98?  
 6 A Yes.  
 7 Q Because he was elected in November of '98 to the  
 8 state assembly; is that correct?  
 9 A Yes. And I purchased my house in June of '98.  
 10 Q The one on Pine Street?  
 11 A Yes.  
 12 Q After you purchased your home on Pine Street, did  
 13 you and the Mayor have sex, sexual intercourse in  
 14 that home in 1998?  
 15 A Yes.  
 16 Q So it would have been after June of '98?  
 17 A Yes, yes.  
 18 Q When did you close on the house in 1998?  
 19 A I think it was June 27 because I moved in -- I  
 20 moved, I tried to move the day -- the day and a  
 21 couple of days after I brought the home.  
 22 Q Did you invite the Mayor into your home for purposes  
 23 of viewing the home?  
 24 A No. He pushed himself into my home.  
 25 Q How did he push himself into your home?

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1 A There was an event, a political event that staff are  
 2 required to go to.  
 3 Q Was it a fund raiser?  
 4 A You know, I don't -- it was an event that  
 5 introduced -- yeah, it was a fund raiser. I know  
 6 the mayor was there and there was a Hispanic woman,  
 7 some high profile Hispanic woman there, and that was  
 8 in the ballet area --  
 9 Q In the what area?  
 10 A The ballet, the Milwaukee ballet which is on 5th and  
 11 National.  
 12 Q All right. Continue.  
 13 A And by this time I was feeling -- I was avoiding the  
 14 Mayor and feeling as -- because he was already  
 15 telling his police officers don't worry, I'll get a  
 16 ride from Marilyn. She lives a block away from me.  
 17 Q Did he do this on the occasion of the fund raiser  
 18 that you're thinking of?  
 19 A He did it at that fund raiser or event, yes.  
 20 Q Do you recollect who on this occasion that you are  
 21 thinking of was the Mayor's driver?  
 22 A No. I recollect one of the staff persons.  
 23 Q Who was the staff person?  
 24 A Orson Porter noticed that I was uncomfortable and  
 25 angry.

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1 Q When did Orson Porter tell you that he noticed you  
 2 were uncomfortable?  
 3 A I looked straight at Orson and sort of give him a  
 4 look like -- because I had already talked to Orson  
 5 about the Mayor doing that.  
 6 Q You had talked to Orson Porter about sexual  
 7 intercourse between you and the Mayor by '98?  
 8 MR. ARELLANO: Objection,  
 9 mischaracterizes her prior testimony.  
 10 Q Subject to the objection.  
 11 A How uncomfortable I was with the Mayor.  
 12 Q You told that to Mr. Porter prior to the time of  
 13 this fund raiser?  
 14 A Yes.  
 15 Q And this fund raiser was held a few days after you  
 16 closed on the house on Pine Street?  
 17 A No. This was on South 19th Street.  
 18 Q I see. So if it was on South 19th Street?  
 19 MR. SCHRIMPF: Let's go off the  
 20 record for a second.  
 21 (Discussion off the record)  
 22 Q Ma'am, if it was in reference to the house on  
 23 South 19th Street, then that occurred in October or  
 24 sometime after October of 1994 and prior to  
 25 October of 1995.

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1 A Yes.  
 2 Q I am trying to confine this question to events in  
 3 1998.  
 4 A Okay.  
 5 Q Did you have a -- first of all, you're certain that  
 6 there was a fund raiser that was held a short time  
 7 after you closed on the house on Pine Street in  
 8 June of 1998?  
 9 A The fund raiser that I was talking to you about was  
 10 when I moved away from the Mayor to 19th and  
 11 Mineral.  
 12 Q Is that 912 South 19th Street?  
 13 A Yes.  
 14 Q I'll try it this way. How many times after you got  
 15 the house on Pine Street and during the year 1998  
 16 did you and the Mayor have sexual intercourse?  
 17 A Yes.  
 18 Q How many times?  
 19 A I'm guessing about three times.  
 20 Q Three times. And that's a guess?  
 21 A It's a guess at this point, yes.  
 22 Q For the three times that you can at least guess at,  
 23 where were the episodes of sexual intercourse? Why  
 24 don't you list them one, two, three.  
 25 A The first one he came from some overnight, what I

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Case Compress

1 told you earlier, some overnight.  
 2 Q In connection with the Brewers Stadium?  
 3 A Yes.  
 4 Q Next one?  
 5 A You know, I just realized that was at my house on  
 6 19th Street.  
 7 Q The one where he had --  
 8 A The Brewers, the Brewers -- the stadium thing.  
 9 Q That was on South 19th Street?  
 10 A Yes.  
 11 Q Okay.  
 12 A I'm sorry.  
 13 Q Once again, I'm trying to work backwards from '99  
 14 into '98, and I'm concentrating on the period of  
 15 time after you bought the house on Pine Street and  
 16 prior to the end of the year 1998, how many times  
 17 did you and the Mayor have sexual intercourse?  
 18 A About three times. And if I could -- I don't have  
 19 them in sequence just because I'm nervous right now.  
 20 But I can tell you about some -- the incident.  
 21 Q Well, I want to know first of all where the  
 22 incidents occurred.  
 23 A In my house.  
 24 Q All three?  
 25 A One was in his house.

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1 Q You can remember one clearly; is that right?  
 2 A Yes.  
 3 Q But you can't remember the date of it?  
 4 A I remember the event.  
 5 Q You remember the event?  
 6 A Earlier, yes.  
 7 Q Was it at your house?  
 8 A Yes.  
 9 Q On Pine Street?  
 10 A Yes.  
 11 Q Who was present?  
 12 A Just he and I.  
 13 Q How did the Mayor get to your house?  
 14 A He took, I think he took his bike.  
 15 Q He rode his bike?  
 16 A Yes.  
 17 Q How was he attired?  
 18 A With baggy pants, with pants, shorts -- not short  
 19 shorts but short to his --  
 20 Q Were they biking shorts or were they jogging shorts?  
 21 A Neither. They were regular pants.  
 22 Q Gentleman's walking shorts?  
 23 A Just regular --  
 24 MR. OLSON: What are those?  
 25 A What are those?

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1 Q During 1998?  
 2 A Yes.  
 3 Q So if one was in his house, two were in your house?  
 4 A Yes.  
 5 Q Were there any other places that you and the Mayor  
 6 had sexual intercourse in 1998?  
 7 A No.  
 8 Q Were there any other places in 1998 or during 1998  
 9 that you and the Mayor had sexual contact without  
 10 necessarily having sexual intercourse?  
 11 A Yes.  
 12 Q Where?  
 13 A In my house.  
 14 Q How many times?  
 15 A About three or four times.  
 16 Q And on those -- all right. Now, with respect to  
 17 sexual intercourse at your house, what is your best  
 18 recollection as to when those events occurred?  
 19 A I can't give them in sequence. I want to give you  
 20 one that I clearly remember.  
 21 Q You remember one and you cannot remember the date?  
 22 MR. ARELLANO: Objection. That's  
 23 not what she said.  
 24 Q Well, I'm trying to figure out what you said.  
 25 A I'm sorry.

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1 MR. CARLSON: You don't have any.  
 2 MR. SCHRIMPF: So much for the  
 3 fashion plates here.  
 4 Q Did he have a shirt on?  
 5 A T-shirt.  
 6 Q Was the weather warm or was it cool?  
 7 A It was cool. It was in October.  
 8 Q Was it in the morning or in the evening?  
 9 A I think it must have been in the morning.  
 10 Q Did you take your children to school that morning?  
 11 A Yes. It was probably later morning.  
 12 Q Later morning?  
 13 A Yes.  
 14 Q Did you know the Mayor was coming to your house or  
 15 did he arrive by surprise?  
 16 A He arrived by surprise.  
 17 Q You didn't know he was coming?  
 18 A No.  
 19 Q Was your door locked?  
 20 A Yes.  
 21 Q Did he arrive at the front door or the back door?  
 22 A When he brought his bike, he came through the back  
 23 door.  
 24 Q Where did he park his bike?  
 25 A He just left it in the back door, in the side door.

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1 Q Did you two have vaginal sex on that occasion?  
 2 A No.  
 3 Q What kind of sex did you have? Intercourse that is.  
 4 A This is in October.  
 5 Q Of 1998?  
 6 A '99.  
 7 Q No, ma'am. I'm talking about 1998.  
 8 A 1998 I had many excuses to give him, so maybe there  
 9 were two times in that year that there was sexual  
 10 contact.  
 11 Q Sexual contact or sexual intercourse?  
 12 A Sexual intercourse.  
 13 Q Were both of these at Pine Street?  
 14 A Yes.  
 15 Q Were any of them at the Mayor's house?  
 16 A I know that there were two times at the Mayor's  
 17 house.  
 18 Q Total in the entire time that you and the Mayor had  
 19 sexual intercourse?  
 20 A Yes.  
 21 Q Only two times at the Mayor's house?  
 22 A Yes.  
 23 Q Every other time was either in a hotel or at the  
 24 office or at one of your houses?  
 25 A Yes.

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1 Q There were no other locations?  
 2 A No.  
 3 Q On the two times that you had sexual intercourse  
 4 with the Mayor in 1998, how did the Mayor get to  
 5 your house?  
 6 A He took his bike.  
 7 Q Both times?  
 8 A No. He took his car.  
 9 Q Drove himself?  
 10 A Yes.  
 11 Q Without a security guard?  
 12 A Yes.  
 13 Q Were these during the week or on a weekend?  
 14 A They were probably during the week.  
 15 Q Were your children present or away?  
 16 A No. They were away.  
 17 Q The Mayor accomplished sexual intercourse both  
 18 times?  
 19 A The first time the Mayor, I had already promised  
 20 that nothing ever was going to happen.  
 21 Q I'm sorry, you promised or he promised?  
 22 A He promised.  
 23 Q That nothing was going to happen?  
 24 A Yes.  
 25 Q This is the first time?

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1 A Yes.  
 2 Q So did you two talk about it before he arrived at  
 3 your house?  
 4 A Several times.  
 5 Q All right. And did you say to him that you didn't  
 6 want to have sex anymore?  
 7 A Yes. One of the times, yes.  
 8 Q Which time?  
 9 A The first time that he was in my house.  
 10 Q You said you don't want to have sex anymore?  
 11 A Yes.  
 12 Q And this was a conversation before he arrived at  
 13 your house?  
 14 A Yes.  
 15 Q What did the Mayor say?  
 16 A He would say stuff like, okay, I promise that's not  
 17 going to happen. I just want to see you and be able  
 18 to talk to you about work related issues. We're  
 19 just going to talk. There's nobody in the office  
 20 that I can really talk to about the real communities  
 21 out there, and I'd like to be able to do that with  
 22 you.  
 23 Q Why didn't you say, Mayor, let's talk at the office?  
 24 A I did. Every time I would schedule something they  
 25 would change it. And the Mayor used to tell me that

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1 these people in this office were racist and that he  
 2 wanted to hear from a real person.  
 3 Q Who did he say was racist?  
 4 A Ruth, Bill Christofferson, Jeff Gillis, Mike Dawson  
 5 and Julie Penman.  
 6 Q Those were the people he identified as racist?  
 7 A Yes.  
 8 Q Now, Ms. Penman didn't work in his office, did she?  
 9 A No.  
 10 Q Ms. Wyttenbach did?  
 11 A Yes.  
 12 Q In 1998 Ms. Dawson did or did not?  
 13 A She went -- I don't remember when she went to the  
 14 Department of City Development.  
 15 Q Who were the other people you mentioned,  
 16 Bill Christofferson?  
 17 A And Jeff Gillis.  
 18 Q Who is Mr. Gillis?  
 19 A He's the person that the Mayor uses for his  
 20 campaigning strategist.  
 21 Q Is he employed in the office?  
 22 A No. He was for awhile. I think he gets paid  
 23 consulting for the campaign.  
 24 Q And Mr. Christofferson in 1998 when this  
 25 conversation occurred, was he employed as the chief

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1 of staff or had he left as the chief of staff?  
 2 A When the Mayor told me that they were racist?  
 3 Q Yes.  
 4 A It was during the time he was chief of staff, during  
 5 the first election that I experienced, which I think  
 6 was, I think it was '96.  
 7 Q The Mayor told you that Mr. Christofferson was  
 8 racist?  
 9 A He said they're all -- you have to understand  
 10 they're all racist. They're from northern Wisconsin  
 11 and they don't know how to deal with Latino and  
 12 black people.  
 13 Q Tell me what you told the Mayor to prompt that  
 14 reaction from the Mayor.  
 15 A They wouldn't take my recommendations seriously.  
 16 Q What recommendation?  
 17 A Whether it was block grant or whether it was  
 18 responding to people of color that were trying to  
 19 get services from the City when people in that  
 20 office, the African-American and Latino, myself and  
 21 some other African-Americans would have an issue  
 22 that was important, not until that office saw that  
 23 this individual or company was a high profile  
 24 company did they deal with them.  
 25 Q Directing your attention to 1998 again, when was the

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1 ended. Are you still tracking the dates correctly?  
 2 A Yes. I think -- no, I shouldn't say yes because I  
 3 don't -- I'm not sure. I need to, I need to look at  
 4 a calendar so I can see.  
 5 MR. SCHRIMPF: Does somebody have a  
 6 calendar?  
 7 MR. ARELLANO: Just answer your  
 8 question the best you can.  
 9 A I don't remember.  
 10 MR. ARELLANO: Are you okay?  
 11 THE WITNESS: No, I want to --  
 12 A I want to answer your questions to the best of my  
 13 ability.  
 14 Q And I would like you to.  
 15 A I've got --  
 16 MR. ARELLANO: Hold on. He's just  
 17 got to -- wait until he asks you a question.  
 18 Q Are you thinking of something?  
 19 A October, yes.  
 20 MR. ARELLANO: Wait until he asks  
 21 you a question.  
 22 A Okay.  
 23 Q Have you focused on October of 1998?  
 24 A Yes.  
 25 Q Did you and the Mayor have sex, sexual intercourse

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1 second episode of sexual intercourse between you and  
 2 the Mayor?  
 3 A It was in October.  
 4 Q Of '98?  
 5 A Yes.  
 6 Q Was it in connection with any particular fund  
 7 raiser?  
 8 A Yes.  
 9 Q Which one?  
 10 A Not a fund raiser. It was in connection with, after  
 11 the fund raiser in '98 I told him that I was very  
 12 strong to say that I was going to get help. Now we  
 13 had an elected official Pedro Colon. Now I've done  
 14 the work that the staff knew that I can do with the  
 15 fund raiser for the Mayor.  
 16 And so in October of '98 he came to talk to me  
 17 about all of that, to tell me that I was doing a  
 18 good job and --  
 19 Q When was the last episode of sex in 1998 in relation  
 20 to the fund raiser?  
 21 A It was the end of '98, at the mid, end, December.  
 22 Q It was December of 1998?  
 23 A This is December -- December, December? Yes.  
 24 Q Now, just so that we're clear, December of 1998 is a  
 25 little bit more than a year before your employment

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1 in October of 1998?  
 2 A No, I'm confusing the dates. I'm confusing the  
 3 dates.  
 4 Q  
 5 A  
 6 Q  
 7  
 8 A  
 9 Q  
 10 A  
 11 Q  
 12 A  
 13 Q  
 14 A  
 15 Q  
 16 A  
 17 Q  
 18  
 19 A  
 20 Q  
 21 A  
 22 Q  
 23 A  
 24  
 25

313

1		1	A
2	Q	2	Q
3		3	
4		4	
5		5	A
6	A	6	
7	Q	7	
8		8	
9		9	
10		10	
11	A	11	
12	Q	12	Q
13		13	
14	A	14	
15	Q	15	A
16	A	16	
17		17	Q
18		18	A
19		19	Q
20		20	A
21		21	Q
22		22	
23	Q	23	A
24	A	24	Q
25		25	A
314		316	
1		1	
2		2	Q
3	Q	3	
4	A	4	A
5		5	
6	Q	6	
7		7	Q
8		8	A
9	A	9	
10	Q	10	
11	A	11	Q
12		12	
13	Q	13	A
14	A	14	Q
15	Q	15	A
16	A	16	Q
17		17	
18	Q	18	
19	A	19	A
20		20	Q
21	Q	21	A
22		22	Q
23		23	A
24	A	24	
25	Q	25	Q
315		317	



Case Compress

1 A  
2 Q  
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4 A  
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11  
12  
13 Q  
14  
15 A  
16 Q  
17 A  
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20 Q  
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318

1  
2  
3  
4  
5  
6  
7 By  
8 Q  
9  
10 A  
11  
12 Q  
13  
14 A  
15 Q  
16 A  
17 Q  
18  
19  
20 A  
21  
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(adjourning at 2:39 P.M.)  
320

1  
2 By  
3 Q  
4  
5 A  
6 Q  
7 t  
8 A  
9  
10 Q Let me ask you a question. In your testimony today  
11 in response to counsel's questions you identified  
12 two sex incidents with Mayor Norquist for October of  
13 1999, but at some point you said September or  
14 October. It could have been one in September and  
15 one in October? You're not clear?  
16 A What I am clear of --  
17 Q I'm just asking you with respect to the incidents in  
18 October.  
19 A October, November, December.  
20 Q Did you say September or October, the first incident  
21 could have happened September, October? You're not  
22 clear?  
23 A No.  
24  
25

MR. ARELLANO: Okay. That's all I  
have. Let's go off the record.

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1 STATE OF WISCONSIN )  
2 COUNTY OF DANE ) ss.  
3 I, TAUNIA NORTHOUSE, a Registered Diplomate Reporter  
4 and Notary Public in and for the State of Wisconsin, do  
5 hereby certify that the foregoing deposition was taken  
6 before me at the offices of Wisconsin Bar Association,  
7 5302 Eastpark Boulevard, City of Madison, County of  
8 Dane, and State of Wisconsin, on the 6th day of March  
9 2002, that it was taken at the request of the  
10 Respondent, upon verbal interrogatories; that it was  
11 taken in shorthand by me, a competent court reporter and  
12 disinterested person, approved by all parties in  
13 interest and thereafter converted to typewriting using  
14 computer-aided transcription; that said deposition is a  
15 true record of the deponent's testimony; that the  
16 appearances were as shown on Page 160 of the deposition;  
17 that the deposition was taken pursuant to notice and  
18 subpoena duces tecum; that said MARILYN FIGUEROA before  
19 examination was sworn by me to testify the truth, the  
20 whole truth, and nothing but the truth relative to said  
21 cause.  
22 Dated March 17, 2002.

Registered Diplomate Reporter  
Notary Public, State of Wisconsin

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