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

MARILYN FIGUEROA,

Complainant,

-vs
CITY OF MILWAUKEE,

)

COMPLAINANT,

CRED Case No.

CR200003454

Respondent.

Videotape Deposition of:

CHIEF ARTHUR L. JONES

Milwaukee, Wisconsin February 25, 2002

Reporter: Taunia Northouse, RDR, CRR

CONDENSED

Two East Mifflin Street • Suite 102

Madison, Wisconsin 53703

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ł		STATE OF WISCONS	7 N		1	VIDEOTAPE DEPOSITION of CHIEF ARTHUR L. JONES,
İ		DEPARTMENT OF WORKFORD	E DEVELOPMENT		2	called as a witness, taken at the instance of the
		EQUAL RIGHTS DI MILWAUKEE CO			3	Complainant, under the provisions of Chapter 885 of
				. = = =	4	the Wisconsin Statutes, pursuant to notice and
	MARTIS	'N FIGUEROA.	?		5	
	MAKILI		,)			subpoena duces tecum, before Taunia Northouse, a
l		Complainant,)) ERD Case No.		6	Registered Diplomate Reporter and Notary Public in
	- 1	/s-) CR2000Q3454		7	and for the State of Wisconsin, at the offices of
	CITY	OF MILWAUKEE,	(8	Murphy, Gillick, Wicht & Prachthauser, Attorneys at
			, ,		9	Law, 330 East Kilbourn Avenue, City of Milwaukee,
		Respondent.)		10	County of Milwaukee, and State of Wisconsin, on the
					11	25th day of February 2002, commencing at 9:24 in the
					12	forenoon.
ļ		Videotape Depo	sition of:		13	Tot choom.
		CHIEF ARTHUR	L. JONES			
		Milwaukee, Wi	sconsin		14	APPEARANCES
l		February 25,	2002		15	VICTOR M. ARELLAND, Attorney,
					16	for LAWTON & CATES, S.C., Attorneys at Law, 10 East Doty Street, Madison, Wisconsin,
1		Reporter: Taumia Want	house one con		17	appearing on behalf of the Complainant.
1		Reporter: Taunia Nort	nouse, RUR, CRK		18	BRUCE D. SCHRIMPF and LEONARD A. TOKUS, Assistant
1					19	City Attorneys, for CITY OF MILWAUKEE, OFFICE OF THE CITY ATTORNEY, 200 Fast Wells Street,
l					20	Milwaukee, Wisconsin, appearing on behalf of the Respondent.
	7				21	
					22	Also present: Marilyn Figueroa and Cheri Garcia
		A CANADA			23	Emily Aurit (videographer)
					24	
1	•		*		25	
			1			3
1.		INDEX		1 - 1 - 1 - 1	1	CHIEF ARTHUR L. JONES,
2	WITNES	<u>.</u> <u>S</u> S	<u> </u>	age(s)	,	
3	CHIEF	ARTHUR L. JONES			2	called as a witness, being first duly sworn,
4		Examination by Mr. Arellan	•	4	3	testified on oath as follows:
5		transfer by M. Artiton		•	4	(Exhibit No. 1 marked for
1					5	identification)
6					6	By Mr. Arellano:
7		<u>E X H I B I</u>	I S		7	Q Good morning, Chief. My name is Victor Arellano as
8	<u>No</u> .	Description	Iden	tifled	8	you probably heard.
9	1	Personnel orders		12	9	A Yes.
10	2	Amended Notice of Taking D		9	10	Q I represent Ms. Figueroa in these proceedings. I
11		Duces Tecum and Subpoena D	uces iccum		11	will be asking you questions. We have called you as
12					12	a potential witness, not as a party to this lawsuit.
13		(Attached to the or copies provided to		t and	13	
14		222.22 2.01.000 00	 -			We obviously will be requesting that you answer
1		05005575		DA 55	14	every question unless your attorney directs you not
15		REQUESTS		PAGE	15	to. There will be times when objections would be
16	1	Police records regarding M	arilyn Figueroa	43	16	raised by either side. We would request that you
17	2	Chief Jones' affidavit		106	17	take a second or two. And once the objection is
18					18	registered for the record, I still would want you to
19					19	answer the question to the best of your ability. Is
20					20	that okay?
21					21	A Yes.
22					22	
i		(0=1=1=1 +======== 5:3 :	1			Q All right. Would you state your full name and
23		(Original transcript filed Attorney Arellano)	I WITH		23	current address for the record, Chief. Why don't
24					24	you give me your business address.
25					25	A Okay. My name is Arthur L. Jones. My address is
		2				4
Ь						· · · · · · · · · · · · · · · · · · ·

2 A And that is your business address? 3 A That is correct. 4 Q Is that correct? 5 A Yes. 6 Q And, Chief, have you ever given testimony under oath before? 8 A Yes. 9 Q Approximately how many times? 10 A A thousand. 11 Q Okay. And I suspect you have given testimony before pursuant to your job as an officer for the City of Milwaukee? 10 A A thousand. 11 Q Okay. And I suspect you have given testimony before pursuant to your job as an officer for the City of Milwaukee? 12 Q Is that correct? 13 A That's correct. 14 A That's correct. 15 Q Is that correct? 16 A That's correct. 17 Milwaukee? 18 A That is correct. 19 Q Is that correct? 19 Q Is that correct? 19 Q Is that correct? 20 And since you've been the chief of police for the city of Milwaukee? 21 Q And since you've been the chief of police for the city of Milwaukee have you ever given testimony under oath? 22 A Yes. 23 Q Approximately how many times? 24 A Yes. 25 Q Approximately how many times? 26 Q Approximately how many times? 27 A Yes. 28 Q All right. When did you actually become the chief of police for the city of Milwaukee? 29 A Since I was – since I've been chief? Q Right. 20 Q And for how long have you been employed for the city of Milwaukee? 21 Q And for how long have you been employed for the city of Milwaukee? 22 A No. 23 A No. 24 Q — as a party? 25 A No. 26 Q All right. When did you actually become the chief of police for the city of Milwaukee? 26 A November 15th, 1996. 27 Q Right. 28 Q A might be last 50 times that you have provided testimony as chief of police, were any of those incidents related to you personally, meaning were you a party to the lawsuits pursuant to your current position as a chief of the police our current position as a chief of the police our current position as a chief of the police our current position as a chief of the police our current position as a chief of the police our current position as a chief of the city of Milwaukee and the main party to the lawsuits pursuant to your current position as a chief of the police our curre	1	749 West State Street, city and county of Milwaukee.	1		Overage hooking and
3 A That is correct 4 Q Is that correct? 5 A Yes. 6 Q And, Chief, have you ever given testimony under oath hefore? 8 A Yes. 9 Q Approximately how many times? 10 A A thousand. 11 Q Okay. And I suspect you have given testimony before pursuant to your job as an officer for the City of Milwaukee? 10 A A thousand. 11 Q Okay. And I suspect you have given testimony before pursuant to your job as an officer for the City of Milwaukee? 11 A That's correct. 12 Q Is that correct? And as I understand today, you are the chief of police for the entire city of Milwaukee? 13 A That is correct. 14 Q Is that correct? 15 Q Is that correct? 16 A Yes. 17 A Milwaukee? 18 A That is correct. 18 Q Is that correct? 19 A Yes. 20 Q Approximately how many times? 21 A Yes. 22 Q Approximately how many times? 23 A Yes. 24 A Yes. 25 Q Approximately how many times? 26 A November 15th, 196. 27 A Since Ctober 16th, 1967. I believe I'm in my 34th year. 28 Q Congratulations, all right. How old are you, Chief? 29 A far in the Milwaukee? 20 A far in the Milwaukee? 21 A Part Syears old. 22 Q Congratulations, all right. How old are you, Chief? 23 A Yes, yes. 24 A Yes, yes party to the lawsuits pursuant to your current position as a chief of police department? 26 Q Were you a party to any of those 50 times? 27 A Yes, yes. 28 Q Were you a party to many of those 50 times? 29 A Yes, yes year. 30 Q Were you a party to many of those 50 times? 31 A No. 32 Q Were you a party to the lawsuits pursuant to your current position as a chief of the police department? 33 A No. 34 A Yes, yes, yes. 35 Q Were you a party to the lawsuit not related to your employment? 35 A No. 36 Q And when was the very last time that you provided testimony as chief of police, were any of those 50 times? 36 A Yes, yes, yes. 37 A Yes, yes, yes. 38 Q Were you a party to many of those 50 times? 39 A Yes, yes, yes, year party to the lawsuits pursuant to your current position as a chief of the police department? 39 A No. 39 Q Were you a party to many of those 50 times? 30 A No. 31 A No. 32 Q We	12			Λ	sworn testimony?
4 A Yes. 5 A Yes. 6 Q And, Chief, have you ever given testimony under oath before? 7 A thousand. 7 Deformantly how many times? 8 A Yes. 9 Q Approximately how many times? 10 A A thousand. 11 Q Okay. And I suspect you have given testimony before pursuant to your job as an officer for the City of Milwaukee? 12 A That's correct. 13 Q Is that correct? And as I understand today, you are the chief of police for the entire city of Milwaukee? 14 A That's correct. 15 Q Is that correct? 16 A Misc you've been the chief of police for the city of Milwaukee? 17 A Milwaukee? 18 A Yes. 19 Q And since you've been the chief of police for the city of Milwaukee have you ever given testimony under oath? 19 Q Is that correct? 20 A Yes. 21 Q And since you've been the chief of police for the city of Milwaukee have you ever given testimony under oath? 22 A Yes. 23 Q Approximately how many times? 24 A Yes. 25 Q Approximately how many times? 25 Q Right. 26 A November 15th, 1967. I believe I'm in my 34th year. 27 A Pins Syears old. 28 Q Auf iright. When did you actually become the chief of police for the city of Milwaukee? 29 A Since October 16th, 1967. I believe I'm in my 34th year. 20 Q During the last 50 times that you have provided testimony as chief of police, were any of those incidents related to you personally, meaning were you a party to any of those 50 times? 20 Q Were you a party to the lawsuits pursuant to your current position as a chief of the police department? 21 A Yes, yes. 22 Q Were you a party to the lawsuits pursuant to your current position as a chief of the police department? 23 A Police of the city of Milwaukee and the deposition. I was a the deposition regarding numerous complaints the City of Milwaukee? 3 I don't know - I would say yes. No being a law interest at the Bradley Center. 4 Their related to some type of civil rights lawsuit filed against the City of Milwaukee? 4 Their related to some type of civil rights lawsuit in the city of Milwaukee? 5 Q Right. 6 A November 15th, 1967. I believe the city of Milwaukee		· .		^	Probably three weeks ago, three weeks to a month.
5 A Yes. 6 Q And, Chief, have you ever given testimony under oath before? 8 A Yes. 9 Q Approximately how many times? 10 A A thousand. 11 Q Okay. And I suspect you have given testimony before pursuant to your job as an officer for the City of Milwaukee? 12 A That's correct. 15 Q Is that correct? And as I understand today, you are the cluid of police for the entire city of Milwaukee? 16 A That's correct. 17 Q Is that correct? 18 A That is correct. 18 A That is correct. 19 Q And since you've been the chief of police for the city of Milwaukee have you ever given testimony under oath? 20 A Pyes. 21 Q And since you've been the chief of police for the city of Milwaukee have you ever given testimony under oath? 22 Q Right. 23 A So. 24 A Yes. 25 Q Approximately how many times? 26 A November 15th, 1966. 27 Q And for how long have you been employed for the city of Milwaukee? 28 A Since I was – since I've been chief? 29 Q And for how long have you been employed for the city of Milwaukee? 30 A Jinght. When did you actually become the chief of police for the city of Milwaukee? 31 A So. 50 times easily. 32 Q All right. When did you actually become the chief of police for the city of Milwaukee? 33 A So. 34 So. 50 times easily. 35 A So. 50 times easily. 46 A Iright. When did you actually become the chief of police for the city of Milwaukee? 47 A Iright. When did you actually become the chief of police for the city of Milwaukee? 48 A Jinght. When did you actually become the chief of police for the city of Milwaukee? 49 A Since I was – since I've been chief? 50 A Porential of the police for the city of Milwaukee? 51 A Since I was – since I've been chief? 52 Q Right. 53 A So. 50 times easily. 54 A Yes. 55 Q And for how long have you been employed for the city of Milwaukee? 55 A Since I was – since I've been chief? 56 A Porential of the city of Milwaukee? 77 A Iright. When did you actually become the chief of police for the city of Milwaukee? 78 A Jinght. When did you actually become the chief of police for the city of Milwaukee? 5	1 .			Ų	And what was the nature of those proceedings?
A A constraint of the police of the city of Milwaukee page and says of the city of page and says of the city of Milwaukee page and sa			1	Α	
Some part Some			1 -		regarding numerous complainants filing lawsuit
8 A Yes. 9 Q Approximately how many times? 1 A A thousand. 11 Q Okay. And I suspect you have given testimony before pursuant to your job as an officer for the City of Milwaukee? 14 A That's correct. 15 Q Is that correct? 16 A That's correct. 17 Milwaukee? 18 A That's correct. 19 Q Is that correct? 19 Q Is that correct? 19 Q Is that correct? 20 A Yes. 21 Q And since you've been the chief of police for the city of Milwaukee have you ever given testimony under early of Milwaukee have you ever given testimony under early of Milwaukee have you ever given testimony under oath? 22 Q Right. 23 A Yes. 24 A Yes. 25 Q Approximately how many times? 25 Q Right. 26 A November 15th, 1996. 27 Q And for how long have you been employed for the city of Milwaukee? 28 A Since October 16th, 1967. I believe I'm in my 34th year. 29 Q Douing the last 50 times that you have provided testimony as chief of police, were any of those current position as a chief of the police department? 28 Q Were you a party to my of those 50 times? 29 Q Were you a party to the lawsuits pursuant to your current position as a chief of the police department? 29 Q Were you ver named in a lawsuit not related to your employment? 20 Q And when was the very last time that you provided to make sure that you don't quie understand my question in a way that you don't please let me know. 29 A Yes. 20 Q Were you ever named in a lawsuit not related to your employment? 30 A Yes, yes. 31 Q And when was the very last time that you provided to the city of Milwaukee and the wool defendants. The Bradley Center was a defendant. Yeah, I believe the two defendants were the City of Milwaukee and the Bradley Center. 32 Q Were you ever named in a lawsuit not related to your employment? 33 A No. 34 No. 35 Q Ard when was the very last time that you provided the city of Milwaukee and the police department? 36 Q Were you ever named in a lawsuit not related to your employment? 38 A No. 39 Q Were you ever named in a lawsuit not related to your employment? 30 A policy for the entire city o			6		against the City of Milwaukee regarding scalping
Q Approximately how many times? A A thousand. Q Okay. And I suspect you have given testimony before pursuant to your job as an officer for the City of Milwaukee? A That's correct. If the city of the office of police for the entire city of the the chief of police for the entire city of Milwaukee? If the correct office		_	7		
A A brownand. John Warner			1 .	Q	Is that related to some type of civil rights lawsuit
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10				Α	I don't know I would say yes. Not being a
Milwaukee? A That's correct. A That is correct. B A That is correct. A Yes. A Yes. A A Since I was — since I've been chief? A Roycomber 15th, 1996. A November 15th, 1996. A Yes. A November 15th, 1996. B A November 15th, 1996. A November 15th, 1996. A November 15th, 1996. B A Sinc					lawyer, I would say yes.
Milwaukee?			12	Q	Somebody's claiming that his or hers constitutional
14 A That's correct. 5 Q Is that correct? And as I understand today, you are the chief of police for the entire city of Milwaukee? 17 A Yes. 18 A That is correct. 18 A That is correct? 19 Q Is that correct? 20 A Yes. 21 Q And since you've been the chief of police for the city of Milwaukee have you ever given testimony under oath? 22 under oath? 23 A Yes. 24 A Yes. 25 Q Approximately how many times? 26 A Since I was — since I've been chief? 27 Q Right. 28 A So, 50 times easily. 29 A Since I was — since I've been chief? 20 Q All right. When did you actually become the chief of police for the city of Milwaukee? 26 A November 15th, 1996. 27 Q And for how long have you been employed for the city of Milwaukee? 28 A Since October 16th, 1967. I believe I'm in my 34th year. 29 Q Congratulations, all right. How old are you, Chief? 20 Q During the last 50 times that you have provided testimony as chief of police, were any of those incidents related to you personally, meaning were you a party to any of those 50 times? 29 A Yes. 20 Q Were you a party to the lawsuits pursuant to your current position as a chief of the police department? 21 A Yes, 9cs. 22 Q Were you ever named in a lawsuit not related to your employment? 22 And when was the very last time that you provided that you didn't quite understand it, so that when w try this case, you don't have some type of argument that you didn't quite understand it, so that when w try this case, you don't have some type of argument that you didn't quite understand in you question in the your country of the police diversion in the police department is being suse the main party when the police department is being sused. Well, almost always. That covers everything. 20 A Their always named as the main party when the police department is being sused. Well, almost always. That covers everything. 20 To your knowledge, these legal proceedings that you just described related to the scalping, was Mayor Norquist also named - 21 Q And who are the plaintiffs in that particular case? 22 A This			13		rights were violated by the City of Milwaukee?
So that correct? And as I understand today, you are the the the the the for police for the entire city of Milwaukee?		A That's correct.	14	Α	Their yes. I would say yes.
16 Milwaukee? 17 Milwaukee? 18 A That is correct. 18 Q And since you've been the chief of police for the city of Milwaukee have you ever given testimony under oath? 20 A Yes. 21 Q And since you've been the chief of police for the city of Milwaukee have you ever given testimony under oath? 22 A Yes. 23 A Yes. 24 A Yes. 25 Q Approximately how many times? 26 Q Right. 27 A Since I was — since I've been chief? 28 Q Right. 29 A S O, 50 times easily. 20 And for how long have you been employed for the city of Milwaukee? 29 A November 15th, 1996. 20 And for how long have you been employed for the city of Milwaukee? 21 A I'm 55 years old. 22 Q our aparty to any of those 50 times? 23 A I'm 55 years old. 24 A Yes. 25 Q Were you a party to the lawsuits pursuant to your current position as a chief of the police department? 21 A Yes, yes. 22 Q Were you ever named in a lawsuit not related to your employment? 23 A No. 24 C All right. When did you actually become the chief of police were any of those incidents related to you personally, meaning were you a party to any of those 50 times? 31 A Yes, yes. 32 Q Were you a party to the lawsuits pursuant to your current position as a chief of the police department? 33 A Yes, yes, yes, Q And when was the very last time that you provided that you didn't quies understand my question in that particular case? 4 I will do that. 5 O C A Yes as a party? 5 A No. 7 To 5 A Yes. 6 A Since I was — since I've been chief? 7 A Yes. 7 Q Congratulations, all right. How old are you, Chief? 8 A I'm 55 years old. 9 A I'm 55 years old. 10 Q buring the last 50 times that you have provided testimony as chief of police, were any of those incidents related to you personally, meaning were you a party to any of those 50 times? A Yes, yes. C Were you a party to the lawsuits pursuant to your employment? A Yes, yes, yes, yes, year old when was the very last time that you provided that you didn't quie understand my question in that particular case? 18 A Congratulations, all right. How old are you, Chief? 19 A I'm			15	Q	And have you been named as the main party to the
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18	17	Milwaukee?	17	·A	I'm always named as the main party when the police
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and you didn't quite understand my question in			•		try this case, you don't have some type of argument
0	120	V This when was the very last time that you provided	20		that you didn't quite understand my question in
	ł	2	1		

1		fairness to you. Is that okay?	1		produced?
2		I understand that, yes.	2	_	Right, correct.
3	Q	Wonderful, all right. If for some reason you need a	3	Α	No, I do not believe that there's records that were
4		break or you need to take a short walk, not for	4	_	not produced.
5		purposes of discussing how you should answer	5	Q	Do you recall whether or not any of your attorneys
6		questions but just because you need a break, please	6		felt that certain records did not respond to the
7		let me know; is that okay?	7		subpoena that is before you which has been marked as
8		All right.	8		Exhibit No. 2?
9	Q	Before coming to this deposition, Chief, did you	9		No.
10		review any records, documents of any kind?	10	Q	All right. So to your knowledge, as you sit here
11	Α	No, I don't believe so.	11		testifying under oath, no records were withheld
12		(Exhibit No. 2 marked for	12		pursuant to any excuse, reason, technicality of any
13	_	identification)	13	_	kind?
14	Q	Let me show you, Chief, what has been marked as	14		No records were intentionally withheld.
15		Exhibit No. 2 of your deposition. And just by	15	Q	Okay. Were any withheld regardless of the
16		looking at the first page, front page, are you able	16		intention?
17		to tell me whether or not you have been served or	17		Not to my knowledge, not to my knowledge. I'm -
18		provided a copy of this document before coming here	18	Q	I have received records that pertain to the City of
19		today?	19		Milwaukee, specifically to the police department,
20		Yes, I was.	20		most of which relate to assignments, promotions,
21		Did you review the entire document?	21		transfers and the like. Why don't you take a quick
22		Yes.	22		look at them and tell me if my representation in
23		Did you understand what the document was -	23		such general fashion is accurate.
24	٠.	Yes.	24		Yes, these would be personnel orders.
25	Ų	that you produce?	25	Ų	All right.
		9			11
1		Yes.	1	Α	With a cover letter from Barbara Wargolet, our
2		Yes. And did you produce or search for records that have	2	Α	With a cover letter from Barbara Wargolet, our paralegal with the City of Milwaukee City Attorney's
1 2 3					paralegal with the City of Milwaukee City Attorney's Office.
3 4	Q A	And did you produce or search for records that have been required pursuant to that subpoena? Yes.	2 3 4		paralegal with the City of Milwaukee City Attorney's Office. Fine. And you believe that Exhibit No. 1 contains
3 4 5	Q A Q	And did you produce or search for records that have been required pursuant to that subpoena? Yes. And did you bring a set of records with you?	2 3		paralegal with the City of Milwaukee City Attorney's Office. Fine. And you believe that Exhibit No. 1 contains all of the records that you believe are pertinent to
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1		11 1 1 1	1 .		
1		cellular phone, a car phone? What type of phone did	1	Α	Well, I don't know what you mean other than police
2		you use, if any?	2		work. Most of the training that I've had is related
3	Α	In the beginning yes, there was a cellular phone	3		to being a police officer.
4		in the car, and later we got a, one of the very big	4	0	Did you enroll in the army?
5		hand held cellular phones, yes.	5		Oh, no, no.
- 1	Ω				
6	Q	· · · · · · · · · · · · · · · · · · ·	6	Ų	No? Okay. And since you've been an employee for
7		use whenever necessary, and for your use as well?	[[the City of Milwaukee, have you ever been demoted,
8	Α	Yes. The phone was in both of the vehicles that we	8		suspended?
9		used for the Mayor. There was a phone in each	9	Α	I was suspended.
10		vehicle, and that phone was accessible to both	10		What period of time?
111		myself and the Mayor and other security officers,	11		Two days.
12		and other staff personnel who were, who may have	12		When was that?
13		been in the vehicles when it necessitated the use of	13		
14			•	^	Probably that's something you don't try to
	^	a telephone.	14	_	remember. Probably 1979, 1980.
15	Ų	And as far as telephone records for those vehicles,	15		What was the nature of the suspension?
16		do you know if the police department keeps any of	16	A	I got into an altercation with another detective in
17		those records?	17		the detective assembly.
18	Α	No.	18	Q	During the years that you have worked for the City
19	Q	Why not, if you know?	19		of Milwaukee, have you ever been named in a lawsuit
20		Well, as a matter of record, we do not keep those	20		where the City of Milwaukee had to pay any type of
21		telephone records. We may have kept those records	21		compensation?
22		at that time, but I was not the chief of police at	22	Δ	Yes.
23		that time. But I know, for instance, now we do not	23		
24		keep records of our cell phones.	24		Tell me how many times.
25	0				I don't know.
123	Q	8	25	Ų	Approximately can you give me a number of —
		13			<u> </u>
1		about your background if you don't mind.	1	Α	I have no idea. I really have no idea.
2	Α	I don't mind.	2		When was the last time that you know of that the
3	0	What's your education, Chief?	l	•	City (2) (1)
4	•		13		(1tv ot Milwaukee had to nav any type of
	Α		3		City of Milwaukee had to pay any type of
1	_	Well, grade school, high school, college.	4		compensation because of a lawsuit where you were
5	Q	Well, grade school, high school, college. Where did you go to school, college?	4 5		compensation because of a lawsuit where you were named as a party?
5 6	Q	Well, grade school, high school, college. Where did you go to school, college? Marquette University and UW-M.	3 4 5 6	A	compensation because of a lawsuit where you were named as a party? I believe it was a federal court trial, maybe nine
5 6 7	Q A Q	Well, grade school, high school, college. Where did you go to school, college? Marquette University and UW-M. What type of field did you study?	4 5	A	compensation because of a lawsuit where you were named as a party? I believe it was a federal court trial, maybe nine months ago, regarding a juvenile that had been
5 6 7 8	Q A Q	Well, grade school, high school, college. Where did you go to school, college? Marquette University and UW-M. What type of field did you study? I graduated with an associates degree in law	4 5 6 7 8	A	compensation because of a lawsuit where you were named as a party? I believe it was a federal court trial, maybe nine months ago, regarding a juvenile that had been arrested and the City, the officers — it was a
5 6 7 8 9	Q A Q	Well, grade school, high school, college. Where did you go to school, college? Marquette University and UW-M. What type of field did you study? I graduated with an associates degree in law enforcement from Marquette, and I graduated with a	4 5 6 7 8 9	A	compensation because of a lawsuit where you were named as a party? I believe it was a federal court trial, maybe nine months ago, regarding a juvenile that had been arrested and the City, the officers it was a federal trial, and there were money damages as a
5 6 7 8 9	Q A Q	Well, grade school, high school, college. Where did you go to school, college? Marquette University and UW-M. What type of field did you study? I graduated with an associates degree in law enforcement from Marquette, and I graduated with a degree in social welfare from the University of	4 5 6 7 8	A	compensation because of a lawsuit where you were named as a party? I believe it was a federal court trial, maybe nine months ago, regarding a juvenile that had been arrested and the City, the officers — it was a
5 6 7 8 9 10	Q A Q	Well, grade school, high school, college. Where did you go to school, college? Marquette University and UW-M. What type of field did you study? I graduated with an associates degree in law enforcement from Marquette, and I graduated with a	4 5 6 7 8 9	A	compensation because of a lawsuit where you were named as a party? I believe it was a federal court trial, maybe nine months ago, regarding a juvenile that had been arrested and the City, the officers it was a federal trial, and there were money damages as a
5 6 7 8 9 10 11	Q A Q A	Well, grade school, high school, college. Where did you go to school, college? Marquette University and UW-M. What type of field did you study? I graduated with an associates degree in law enforcement from Marquette, and I graduated with a degree in social welfare from the University of	4 5 6 7 8 9	A	compensation because of a lawsuit where you were named as a party? I believe it was a federal court trial, maybe nine months ago, regarding a juvenile that had been arrested and the City, the officers it was a federal trial, and there were money damages as a result of that trial. And I was named as the chief of police.
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5 6 7 8 9 10 11	Q A Q A	Well, grade school, high school, college. Where did you go to school, college? Marquette University and UW-M. What type of field did you study? I graduated with an associates degree in law enforcement from Marquette, and I graduated with a degree in social welfare from the University of Wisconsin-Milwaukee, a bachelor's degree. When did you graduate? 1993 with a bachelor's degree; the associates degree	4 5 6 7 8 9 10 11 12	A Q A	compensation because of a lawsuit where you were named as a party? I believe it was a federal court trial, maybe nine months ago, regarding a juvenile that had been arrested and the City, the officers — it was a federal trial, and there were money damages as a result of that trial. And I was named as the chief of police. You were not named as the actor? No.
5 6 7 8 9 10 11 12 13 14	Q A Q A	Well, grade school, high school, college. Where did you go to school, college? Marquette University and UW-M. What type of field did you study? I graduated with an associates degree in law enforcement from Marquette, and I graduated with a degree in social welfare from the University of Wisconsin-Milwaukee, a bachelor's degree. When did you graduate? 1993 with a bachelor's degree; the associates degree from Marquette in 1978.	4 5 6 7 8 9 10 11 12 13 14	A Q A Q	compensation because of a lawsuit where you were named as a party? I believe it was a federal court trial, maybe nine months ago, regarding a juvenile that had been arrested and the City, the officers it was a federal trial, and there were money damages as a result of that trial. And I was named as the chief of police. You were not named as the actor? No. But in your official capacity
5 6 7 8 9 10 11 12 13 14 15	Q A Q A	Well, grade school, high school, college. Where did you go to school, college? Marquette University and UW-M. What type of field did you study? I graduated with an associates degree in law enforcement from Marquette, and I graduated with a degree in social welfare from the University of Wisconsin-Milwaukee, a bachelor's degree. When did you graduate? 1993 with a bachelor's degree; the associates degree from Marquette in 1978. So is it fair and accurate to say that you were	4 5 6 7 8 9 10 11 12 13 14	A Q A Q A	compensation because of a lawsuit where you were named as a party? I believe it was a federal court trial, maybe nine months ago, regarding a juvenile that had been arrested and the City, the officers it was a federal trial, and there were money damages as a result of that trial. And I was named as the chief of police. You were not named as the actor? No. But in your official capacity That's correct.
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5 6 7 8 9 10 11 12 13 14 15 16 17 18 19 20 21 22	QAQA QAQAQAQ	Well, grade school, high school, college. Where did you go to school, college? Marquette University and UW-M. What type of field did you study? I graduated with an associates degree in law enforcement from Marquette, and I graduated with a degree in social welfare from the University of Wisconsin-Milwaukee, a bachelor's degree. When did you graduate? 1993 with a bachelor's degree; the associates degree from Marquette in 1978. So is it fair and accurate to say that you were already employed by the City of Milwaukee? Yes. And are you married? Yes. Children? Yes. How many?	4 5 6 7 8 9 10 11 12 13 14 15 16 17 18 19 20 21 22	A QAQAQ A	compensation because of a lawsuit where you were named as a party? I believe it was a federal court trial, maybe nine months ago, regarding a juvenile that had been arrested and the City, the officers — it was a federal trial, and there were money damages as a result of that trial. And I was named as the chief of police. You were not named as the actor? No. But in your official capacity — That's correct. — as the Chief, okay. Before coming to this deposition, at any time before today have you reviewed any testimony of any of the witnesses in this case, Chief? No.
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5 6 7 8 9 10 11 12 13 14 15 16 17 18 19 20 21 22 23	QAQA QAQAQA QAQA	Well, grade school, high school, college. Where did you go to school, college? Marquette University and UW-M. What type of field did you study? I graduated with an associates degree in law enforcement from Marquette, and I graduated with a degree in social welfare from the University of Wisconsin-Milwaukee, a bachelor's degree. When did you graduate? 1993 with a bachelor's degree; the associates degree from Marquette in 1978. So is it fair and accurate to say that you were already employed by the City of Milwaukee? Yes. And are you married? Yes. Children? Yes. How many? Two. And as far as training, Chief, other than police	4 5 6 7 8 9 10 11 12 13 14 15 16 17 18 19 20 21 22 23 24	A QAQAQ AQ A	compensation because of a lawsuit where you were named as a party? I believe it was a federal court trial, maybe nine months ago, regarding a juvenile that had been arrested and the City, the officers it was a federal trial, and there were money damages as a result of that trial. And I was named as the chief of police. You were not named as the actor? No. But in your official capacity That's correct. as the Chief, okay. Before coming to this deposition, at any time before today have you reviewed any testimony of any of the witnesses in this case, Chief? No. Have you met with anyone to discuss your testimony today? I met with my attorneys this morning. When you met with your attorneys, did you review any
5 6 7 8 9 10 11 12 13 14 15 16 17 18 19 20 21 22 23 24	QAQA QAQAQA QAQA	Well, grade school, high school, college. Where did you go to school, college? Marquette University and UW-M. What type of field did you study? I graduated with an associates degree in law enforcement from Marquette, and I graduated with a degree in social welfare from the University of Wisconsin-Milwaukee, a bachelor's degree. When did you graduate? 1993 with a bachelor's degree; the associates degree from Marquette in 1978. So is it fair and accurate to say that you were already employed by the City of Milwaukee? Yes. And are you married? Yes. Children? Yes. How many? Two.	4 5 6 7 8 9 10 11 12 13 14 15 16 17 18 19 20 21 22 23	A QAQAQ AQ A	compensation because of a lawsuit where you were named as a party? I believe it was a federal court trial, maybe nine months ago, regarding a juvenile that had been arrested and the City, the officers it was a federal trial, and there were money damages as a result of that trial. And I was named as the chief of police. You were not named as the actor? No. But in your official capacity That's correct. as the Chief, okay. Before coming to this deposition, at any time before today have you reviewed any testimony of any of the witnesses in this case, Chief? No. Have you met with anyone to discuss your testimony today? I met with my attorneys this morning.

1	A No.	1	Q	Who's your boss?
2	Q Have you ever seen the complaint filed by	2		The fire and police commission has oversight
3	Marilyn Figueroa in this case, Chief?	3		authority over the fire and police department.
4	MR. SCHRIMPF: Objection only as to	4	0	And I suspect only the commission can make a
5	clarity because at this point, counsel, we	5	~	determination as to your future within the police
6	have I believe we're on our third amended	6		department?
7	complaint.	7	Δ	That is correct.
8	•	8		Is that correct?
	Q Any of the complaints that Marilyn Figueroa has		•	That is correct.
9	filed against the City of Milwaukee.	9		i
10	A Yes.	10		You do not serve at the pleasure of the Mayor?
111	Q Have you seen the most recent third amended	11		That is correct.
12	complaint	12	Q	And is this an elected position or is this just a
13	A No.	13		civil service position, to your knowledge?
14	Q Chief? When was the first time that you read or	14		My position?
15	reviewed the complaint that Ms. Figueroa filed	15	•	Yes.
16	against the City of Milwaukee?	16		I'm appointed by the fire and police commission.
17	A When it was on the Internet:	17	Q	When you started your job as a police chief, who, if
18	Q You read the entire matter?	18		anyone, appointed you to that position?
19	A I can't say that I read the entire matter, but I did	19	Α	The fire and police commission.
20	read it. The lawsuit that was on the Internet, I	20	· Q	To your knowledge, did Mayor Norquist make any
21	did read it, yes. The base of the second sec	21		recommendations one way or another?
22	Q Other than that, you have not reviewed any sworn	22	Α	I believe he did.
23	testimony given by other witnesses in this case?	23	Q	Is that right? And what's your understanding as far
24	A.No The residence make the control is	24	- 2	as what the Mayor did to endorse you or support you?
25	Q Is that correct? Now, this is going to be a rather	25	Α	It's my understanding that the Mayor has, and it was
	17			19
1	ailly avertion but it shouldn't be difficult to	1	<u>ئىر يە</u> داد	my understanding bassuss I was in the Mayorla office
	silly question, but it shouldn't be difficult to			my understanding because I was in the Mayor's office
2	answer. Can you just give me a general definition	3		with the previous chief, that he has conversations with the commissioners and makes a recommendation.
3	of your job responsibilities as the chief of police?		0	
4	A Well, I'm responsible for the good order, discipline	4	V	And I suspect by virtue of the way things work in
5	and efficiency of the police department. I have	5		Milwaukee the Mayor's the Mayor's influence is
6	responsibility in budgetary matters, disciplinary	6		taken quite seriously?
1 ′	matters. I'm responsible for enforcing all of the	7		I don't understand your question.
8	laws and ordinances in the city of Milwaukee and of	8	Q	• • • • • • • • • • • • • • • • • • • •
9	the state of Wisconsin and of the United States of	9		Mayor is a strong factor for anyone to obtain a
10	America, that any violations that would take	10		position with the City of Milwaukee such as
11	place within the corporate city limits of the City	11		yourself?
12	of Milwaukee, which could possibly extend to the	12		I would think so, yes.
13	county of Milwaukee, because Milwaukee police	13	-	All right. How long have you known Mayor Norquist?
14	officers have authority to make arrests throughout	14		Since 1987.
15	Milwaukee County.	15	Q	Do you think you know him well?
16	Q Fine. I suspect you have the authority to fire	16		Yes. Not in '87 but
17	and/or hire?	17	Q	But today you do?
18	A That is correct.	18		Subsequently. Well, not so well now as I did in the
19	Q To promote and/or demote	19		past.
20	A That is correct.	20	0	Let the record speak for itself. Mayor Mayor,
21	Q within the police department?	21	*	excuse me. Chief, let me ask you a couple
22	A That is correct.	22		questions. Do you understand that under the Fair
23	Q Who do you report to, Chief?	23		Employment Act, as well as under the civil rights
24	A I report to when you say report to, it makes	24		, ,
25	it	25		laws, anyone that provides testimony in a
123		23		proceedings such as this is protected from any type
L	18			20

Г				1		C. COTTEO E/LOTOL SHEET O
1	1	٨	of retaliation; are you aware of that?	1	Α	Well, the answer to your question is yes and no, if
-	2		Yes. I mean I understand retaliation, yes.	2		I may explain.
	3	Q	And so you understand that if you were to say	3	•	Yes. Go ahead.
	4		anything that would not be consistent with what the	4	Α	When I left in 1991, I temporarily was the field
'	5		City of Milwaukee would wish you to say, you	5		deputy, an acting field deputy inspector until
	6		understand that you would be protected under the	6		August of 1991. In August of 1991 I became the
-	7		civil rights act?	7		captain of the district No. 7. In August of 1992 I
	8	Α	I don't understand your question when you reference	8		was promoted to the rank of deputy inspector and
	9		to what the City of Milwaukee would want me to say.	9		served and that was supervising the entire police
1	10		I've sworn	10		department on the second and third shifts. In
ı	11	Q	Would not want you to say?	11		the I want to get the years correct here. In the
1	12		I've sworn under oath to tell the truth.	12		fall of 1995 I at the direction of the chief, and at
	13		Right.	13		the assignment of the chief, I became the deputy
	14		And that is what I will do.	14		inspector in charge of the special operations
	15		And all I'm just simply saying, you understand that	15		bureau, which would have, which actually my dates
	16	`	anyone that testifies under oath is protected from	16		may be but in 1996, early 1996 I became the
	17		retaliation?	17		commanding officer of the special operations bureau.
- 1	18	Α	I understand that, yes.	18	,	And the special assignment division is part of the
	19		You mentioned that you have known Mayor Norquist	19		special operations bureau. So then I would have had
	20	•	since 1987; correct?	20		command authority over the special assignment
	21	Α	That is correct.	21		division until I was promoted chief in November of
	22		And I suspect when you worked under him as a	22		1996.
	23	~	security is that the proper title, the proper	1	Q	
	24		term, Chief, security?	24	Ų	officers assigned to Mayor Norquist directly and/or
	25	Α	Yes. I was the head of the security detail, special	25		indirectly continued to report to you?
			21	20		23
			and the first of the control of the	l		23
	. 20					
	1		assignment division of the Milwaukee Police	1	Α	Well, indirectly as the chief, yes, yes. But not
	2		Department.	2		directly report to me.
	2 3	Q	Department. Were you the person assigning various drivers and	i .		directly report to me. Right. But their superiors, whomever their
	2 3 4	Q	Department. Were you the person assigning various drivers and securities for the Mayor during the period in which	2 3 4	Q	directly report to me. Right. But their superiors, whomever their supervisors were, would have reported to you?
	2 3 4 5	Q	Department. Were you the person assigning various drivers and securities for the Mayor during the period in which you served as the head of that particular security	2 3 4 5	Q	directly report to me. Right. But their superiors, whomever their supervisors were, would have reported to you? No. When I was chief?
	2 3 4 5 6		Department. Were you the person assigning various drivers and securities for the Mayor during the period in which you served as the head of that particular security function?	2 3 4	Q	directly report to me. Right. But their superiors, whomever their supervisors were, would have reported to you?
	2 3 4 5 6 7		Department. Were you the person assigning various drivers and securities for the Mayor during the period in which you served as the head of that particular security function? Well, the ultimate assignment would have been that	2 3 4 5	Q A Q	directly report to me. Right. But their superiors, whomever their supervisors were, would have reported to you? No. When I was chief? Correct. When I was chief let me just say that there's a
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1	at least with respect to unusual or serious things	1		then Linda Velasco, lieutenant Linda Velasco became
2	that would happen in providing security to the	2		the commanding officer.
3	Mayor, those things would be reported to you?	3		Did you have anything to do with the appointment of
4	A Those unusual things would be reported to me, yes.	4		Donald Werra to the position that supervised
5	Q Okay.	5		security for the Mayor?
6	A With the exception of the unusual things, those			Yes.
7	unusual things would be reported to me.		-	What about Linda Velasco?
8	Q And I suspect that before 1996 when you worked as a			Not directly, no.
9	security for the Mayor, those who were also			Did Linda Valesco ever report to you directly and/or
10	appointed to serve as security for the Mayor, those	10		indirectly while she was assigned to be the security
11	individuals would also report to you?	11		for Mayor Norquist?
12	A Now before 1996, we have to say before 1991.	1		Yes.
13	Q '91?	t	-	And that would have been from what year to what
14	A Yes.	14		year, Chief?
15	Q Now, is it and I'm going the hard way here,			Well, when I was chief 1996. Donald Werra still
16	Chief.	16		worked for the police department when I was chief.
17	A That's okay.	17		He left I believe in 1997 and Linda,
18	Q So from 1991 to 1996 you're leading me to believe	18		Lieutenant Velasco was then a sergeant I believe.
19	that you were not directly involved with security	19		She may have been a lieutenant. I can't recall what
20	officers that served the Mayor?	20	ķ.	rank she was, but she was assigned to the special
21	A Yes. I want you to understand, not just to lead you	21	,	operations. When Donald Werra left, she became the
22	to believe, that from 1991 until late 1995 or early	22	∵≟:	commanding officer.
23	1996 the commanding officers of the special	23		So that would have been in '97?
24	assignment division did not report to me. In late	24	A	I believe it was '97. It could have been as late as
25	1995 or early 1996 I did become the commanding	25	şel.	[98]
i	25	1		27
1				The second secon
1	officer of the special operations bureau, of which	1	Q	And when did she leave her position, if she did, as
	officer of the special operations bureau, of which the special assignment division was a division of	1 2	317 314	security to the Mayor?
2	officer of the special operations bureau, of which the special assignment division was a division of that bureau, and the commanding officer would have	1 2 3	317 314	security to the Mayor? In 2000, April or May of 2000. That's my
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(608) 255-7700

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1		No. He retired.	1		mentioned that name. His name is Conrad Zvara
2	Q	The Mayor, as I understand based on your sworn	2		spelled Z-V-A-R-A, I believe. That's the lieutenant
3		testimony here, the Mayor requested a change and	3		that replaced Lieutenant Velasco.
4		asked you to replace Linda Velasco; did I understand	4	Q	Did you appoint Mr. Zvara?
5		you correctly?	5		I appointed I assigned him to the Mayor's office,
6	Α	That's correct.	6		yes.
7	Q	When, approximately when did the Mayor request that	7	0	To the position?
8	`	Ms. Velasco be replaced?	8		As Chief, yes.
9	Α	It was shortly after the last election, so it would	9		Ms. Velasco was the security officer for
10		either be April or May of 2000.	10	Ų	
11	Ω	Before the Mayor approached you with a request that	11	٨	approximately four years?
12	V	Linda Velasco be replaced, did the Mayor ever have	1		That I don't know.
13			12	Ų	If Werra left in 1996 or '97, Ms. Velasco took over
	۸	any complaints of any nature about Ms. Velasco?	13		and left on April 2000 at the request of the Mayor;
14	М	Well, if you say of any nature and ever, then I	14		correct?
15		would be hard pressed to say no. But I don't recall	15	Α	Yes. But she was there as a security officer prior
16	^	any.	16		to Werra leaving.
17	Ų	So you're just assuming that he may or may have not,	17		So she just continued?
18		but you don't know of any?	18		Ycs.
19	A.	Well, I don't recall of any. You know, I think the	19	Q	Was she given a promotion?
20		way you phrased the question, any and ever kind of	20	Α	That I can't recall. I can't recall whether she was
21	* *-	makes it hard for me to say that he's never walked	21	17:	a lieutenant prior to Captain Werra leaving or if
22		up to me and has made a complaint about something	22		she became a lieutenant after he left. I can't
23	10	that she may or may not have done. But I don't	23		recall that the same Some State of the same of the same
24		recall any. And I think if anything serious, I	24	Q	When the Mayor requested that Ms. Velasco be
25	1,.	would recall it.	25	- (3)	removed, did he give you any specific reason, any
		29			31
1		C	4		and the second s
1	Q	So prior to April 2000 when he requested that	1		message that you took as to why he was asking for a
2	Q	Ms. Velasco be removed, you don't recall any	2		change?
2 3	Q	Ms. Velasco be removed, you don't recall any specific problems he may have had with Ms. Velasco's	2 3	Α	change?
2 3 4	2.00	Ms. Velasco be removed, you don't recall any specific problems he may have had with Ms. Velasco's conduct, performance	2 3 4	A Q	change? No. Is Ms. Velasco a Hispanic background officer?
2 3 4 5	Α	Ms. Velasco be removed, you don't recall any specific problems he may have had with Ms. Velasco's conduct, performance I don't recall any.	2 3	A Q A	change? No. Is Ms. Velasco a Hispanic background officer? Yes.
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1			
1 -	A No.	1 A	Well, generally from my conversations with Linda
2	Q Ever even when you were security?	2	regarding the rumors, she was not happy with that
3	A Well, I mean I participated. I mean I was his	3	relationship. She was I would say that she felt
4	security. I went with him.	4	that that wasn't proper, that that was yes, I
5	Actually I left. I did not well, I met him	5	guess I could say.
6	at a fund raiser before I worked for him, and I	6 Q	To your knowledge, when Ms. Velasco shared her views
7	left I left the Mayor's office prior to the next	7	with you regarding this alleged relationship, did
8	election. So but the answer is, I mean he did	8	she share any criticism of either party?
9	political things and I was with him.	9 A	If I had to say that she was critical, she would
10	Q Okay.	10	have been critical of the Mayor.
11	A And I mean he met political people and I was with	11 Q	Did you ever share these discussions that you had
12	him. He had fund raisers and I was with him.	12	with Ms. Velasco with Mayor Norquist before she was
13	Q Did you ever make any financial contribution for	13	removed?
14	Mayor Norquist?		No.
15		,	Do you recall before she was removed did you talk
16	Q Did you ever belong to the Mayor's Club?	16	with Ms. Velasco about the rumors before she was
17	A: No.	17	removed?
18			Yes, yes. That was before.
19	·		Did you continue talking, at any point after she was
20		20	removed as security to the Mayor, did you ever
21	was for \$20, 100 miles and 100 miles are 100 miles and 100 miles are 100 miles and 100 miles are 100	21	
22			Well, you know, after the public acknowledgment of
		23	the relationship, I believe I had discussions with
24	Q Do you want it back yet?	24	Linda Velasco.
25	A I think I gave up that 20 bucks.	25 Q	Tell me some of the discussions that you had with
	33		35
1.1	Q To your knowledge, was Ms. Velasco a friend of	1.0	
2	Marilyn Figueroa before she left?	1	I can't recall. I think I've had discussions with
3	A I believe they were friends.	3	: overwhody regarding the relationship. I can't
4		1 .	everybody regarding the relationship. I can't
	Q Did Ms. Velasco ever discuss with you	4	specifically recall a discussion with her, but the
5	Marilyn Figueroa in any manner?	5	specifically recall a discussion with her, but the discussions that I had with people would have been,
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		0 10 11 1 13 6 11 0	1 4	_	
		Specifically about Marilyn?	1		tectives on the scene, and he was the commanding
2	Q	Yes. Did she say anything negative about Marilyn?	2	of	ficer of the criminal investigation bureau, and he
3	Α	Oh, no, no.	3	cal	lled me.
4	Q	Did she think Marilyn was a liar?	4	Q Le	et me see if I can understand what you're telling
5	Α	No, she never told me that.	5		e. Are you telling me that there was a time when
6		Did she ever criticize Marilyn for this alleged	6		e police was called to Marilyn Figueroa's house?
7	•	relationship?	7		nat's correct.
8	Δ	No.	8		
			1 .		nd there were several detectives that went to the
9	Ų	Did she ever disclose to you any conversations she	9		ouse?
10		may have had with Marilyn Figueroa, Chief?	i .		least one.
111		No.	11		you recall approximately the time when this
12		Did you ever inquire about that?	12		curred?
13	Α	No.	ľ	A No	0.
14	Q	What about Mr. Werra? Did he ever before April of	14	Q Ar	nd do you recall who called the police?
15		the year 2000, did he ever disclose any information	15	AIn	vould assume from the conversation, as I recall
16		regarding anything unusual between Marilyn Figueroa	16	it,	that Ms. Figueroa called the police.
17		and Mayor Norquist?	17		nd do you know why she called the police?
18	. A	No.			o. I did at the time, but I don't recall now
19		Did he ever make any comments about strike that.	4		as this one of the police calls, was this listed as
20	. ~	Did he ever share any information with you about	20		15
21		observations he made regarding the Mayor and			
22					my recollection is it was Ms. Figueroa that
	Λ.	Marilyn Figueroa, any observations?	i		lled an character street and the street
23	Α.	No, no. I was just thinking of something. I may			inderstand that. See Selection for the selection of the selection
24		not have answered your question accurately. When I			nd she is a citizen action of the control of the co
25	1.5	was chief, I received a phone call and officers had	25	Q∂Ri _{	ght. But was she making a call to the police
1	4	37			39 39 39 39 39 39 39 39 39 39 39 39 39 3
1		been called, and I don't remember the exact date,	1	-	
				- he	cause she needed the notice to come over to her
					cause she needed the police to come over to her
2		officers had been called to Ms. Figueroa's house,	120151	ho	use? Algebra schallege blee bleek at a sterenived
3		officers had been called to Ms. Figueroa's house, and they informed me, and I don't remember exactly	12. 5 31.2	ho A Ye	ruse? สำหรับสามารถในประชุทธิบาล ค.ศ. ค.ศ. ค.ศ. ค.ศ. ค.ศ. ค.ศ. Sirouliun turuni (โดยเรียก เรียก) ค.ศ. ค.ศ. ค.ศ. ค.ศ. ค.ศ. ค.ศ.
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2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18 19 20 21 22	A Q A Q A	officers had been called to Ms. Figueroa's house, and they informed me, and I don't remember exactly who called me, but they informed me that Marilyn Figueroa had told the officers that she had had a relationship with the Mayor. And so I did receive that information. You received a phone call? Yes. That officers had been called to Marilyn Figueroa's residence, and she had told the officers that she had had a relationship with the Mayor. Or they told me that she was saying that she had had a relationship with the Mayor. Do you recall when this would have happened? It would have happened Was that before she left the City or after she left the City? It was before, I believe that I don't know. I can't say. Who called you, which officers called you? I don't recall. I'm trying to remember now. It may have been deputy chief he was a deputy chief at	2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18 19 20	A Ye Q Ar po A I d Q I g cal ne A Ot res na the Q Wi ful the A Ye	nuse? Indicate a content of the series of t
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2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18 19 20 21 22 23 24	A Q A Q A Q	officers had been called to Ms. Figueroa's house, and they informed me, and I don't remember exactly who called me, but they informed me that Marilyn Figueroa had told the officers that she had had a relationship with the Mayor. And so I did receive that information. You received a phone call? Yes. That officers had been called to Marilyn Figueroa's residence, and she had told the officers that she had had a relationship with the Mayor. Or they told me that she was saying that she had had a relationship with the Mayor. Do you recall when this would have happened? It would have happened Was that before she left the City or after she left the City? It was before, I believe that I don't know. I can't say. Who called you, which officers called you? I don't recall. I'm trying to remember now. It may have been deputy chief he was a deputy chief at the time. He's the assistant chief now, Stenzel.	2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18 19 20 21 22 23	A Yee Q Ar po A I d Q I g cal nee A Ob res na the Q Wi ful the A Yee inv the Q Do Jan A It	is and do you know how she was described once the olice arrived at her home? Ion't recall. I just recall that and I just guess what I'm trying to understand is she didn't ll them just to tell them I mean was she in sed of help? Ioviously she wanted the police to come to her sidence and we responded. I don't recall the sture of the reason for her call. I don't recall the sture of the reason for her call. I don't recall the sture of the reason for her call. I don't recall the sture of the reason for her call. I don't recall the sture of the reason for her call. I don't recall the sture of the reason for her call. I don't recall the reason for her call. I don't recall the sture of the reason for her call. I don't recall the sture of the describe did they give you a ll context as to how the whole encounter between the police and Ms. Figueroa occurred? The would have told me why the original squads the series and why ultimately the criminal vestigation bureau responded, but I do not recall the context of that conversation. To you know if that was during the month of nuary of 2000?

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1	was hospitalized?	1	Q Okay, good.
2	A Yes, I'm aware of that.	2	MR. ARELLANO: Counsel, I would
3	Q Do you know if the police were called before or	3	request that the chief or his staff make a
4	after the hospitalization, assuming that the	4	search for the report, if there is one,
5	hospitalization occurred in January of 19 of the	5	pursuant to that telephone call that he's
6	year 2000?	6	referencing here today.
7	A It could have been before.	7	MR. SCHRIMPF: Let me just ask, how
8	Q To your knowledge, was it early January?	8	would it be filed, Chief?
9	À I can't	9	THE WITNESS: It may be filed under
10	Q Of the year 2000?	10	whatever reason the initial I can look into
11	A I'm giving you my best recollection.	11	that. I can ask. Whatever reasons the
12	Q But was it around the time when the whole thing kind	12	original squad was sent, somewhere we would
13	of exploded?	13	have a record of the squad that was being sent
14	A I believe it was before that.	14	and
15	Q So when Marilyn Figueroa according to Mr. Stenzel	15	Q Okay, I appreciate that.
16	or the detective that would have been at her home	16	A Okay.
17	pursuant to her request, at the time	17	Q And any other record that may be
18	Marilyn Figueroa may have told him that was in the	18	A I will.
19	context of having a problem, meaning calling the	19	Q — in your office related to Ms. Figueroa in any
20	police, I need some help?	20	direct and/or remote fashion or manner. All right.
21	A I can only I have to assume that, and my	21	Now, do you recall, Chief, during all the years that
22	recollection is is that Ms. Figueroa called the	22	you have been associated with security for the Mayor
23	police. And I can only assume that she would only	23	but prior to April 2000, do you recall any of the
24	call the police if she wanted the police there at	24	security officers ever reporting to you anything
25	her house for a police purpose. And for the	25	unusual regarding Mayor Norquist and
23	Ma ther house for a poince purpose. And for the	20	V3
	71		TO
1	detectives to get called, the initiating responding	1	Ms. Marilyn Figueroa? And by that I mean anything
2	officers, there would have had to have been of some	2	that would lead anybody to assume that there was
3	substance that they felt they needed to contact the	3	some type of relationship going?
4	criminal investigation bureau. And I know that	4	A No.
5	detectives, a detective or detectives were on the	5	Q When you served as a security officer for the Mayor,
6	scene, and that's my best recollection.	6	do you recall ever transporting the Mayor to
7	Q Was there a report filed pursuant to that incident?	7	Ms. Figueroa's residence?
8	A There should have been, yes.	8	A Never.
9	Q Do you know if a full report of what led	9	Q Do you know of any officer that may have reported
10	Ms. Figueroa to make those statements was taken by	10	that fact to you?
11	the police officers?	11	A No officer reported that fact to me.
12	A I would assume that it would be, yes.	12	Q Do you recall whether or not you or anyone that has
13	Q Is there a reason, Chief, why you didn't produce	13	been associated with security that you know of ever
14	that report today pursuant to my subpoena?	14	reported giving Ms. Figueroa a ride to
15	A Then it would be because there is not a report or	15	Mayor Norquist's residence?
16	that that document was not thought of. I don't	16	A No.
17	there's no reason I know of no reason.	17	Q All right.
18	Q I'm not blaming you.	18	A And I answer that based on both of your questions,
19	A No, I'm just saying I know of no reason.	19	never did I, nor do I have knowledge of anyone else.
20	Q We had Mr. Soika telling you that counsel had told	20	Q Okay, thank you. Do you recall, Chief, during the
21	him that certain things were not pertinent to my	21	period of time that you have been associated with
22	subpoena, but I just want to make sure that	22	the security of Mayor Norquist, and I am talking
23	A I've answered that question. Counsel never told	23	about directly and/or indirectly, do you recall ever
24		24	
	me no one ever told me not to produce any	25	being in a car or in a location where Mayor Norquist
25	documents.	20	would engage in making telephone calls to
1	42		44

1		Marilyn Figueroa's residence?	1		meet him in Chicago. And I checked with the
2	Α	No. The only time that I recall having would have	2		Illinois state police. I recall he specifically
3		been, in a car with the Mayor, would have been while	3		mentioned at the tollway. But at any rate, I
4		I was assigned to security, and that would have been	4		checked with the Illinois state police and they told
5		up to 1991. I do not recall I don't even believe	5		me that there was no accident involving
6		I knew of Marilyn Figueroa at that time. I have	6		Marilyn Figueroa.
7		been in the car with the Mayor when he's made phone	7		I believe I even called her residence to see
8			1		
		calls, but I don't believe that any of those phone	8		if in fact she had left to go to Chicago, and I
9		calls I would have been with him anytime after that	9		don't recall if I spoke with anybody at her
10		would have been to Marilyn Figueroa. I have no	10		residence or not. But I ultimately ended up
111	_	reason to believe that that would have happened.	11		informing the Mayor that Marilyn had not been
12	Q	When you were security for Mayor Norquist, do you	12		involved in an accident. Oh, excuse me, I also
13		recall ever attending any type of political or work	13		checked the Wisconsin State Patrol.
14		related conference where Marilyn Figueroa was also	14	Q	To your knowledge, did Marilyn ever show up for that
15		present?	15		conference?
16	Α	Well, when you say conference	16	Α	I don't I have if you asked me what I
17	Q	Or activity.	17		believed, I would say no. I would believe that she
18	Α	Oh, okay, yes.	18∃		did not. And why I believe that, I don't know,
19		Tell me how many times if you can recall.	19		but x rank in a just to find a design
20		I can't recall. I would say at least 20. No, maybe	20	0	Did the Mayor share with you who had informed him,
21		maximum of 20, around 20 I would say. I don't want	21		if anyone, who had informed him that Marilyn had
22		to fudge one way or the other, but a lot of public	22		been involved in a car accident?
23	ξ.	appearances that the Mayor was at Marilyn was there	4 1	Α	No. He wasn't asking me like he had been told that
24		and I was there.	24		Marilyn was in an accident. He was asking me to
1	\mathbf{O}	During any of those 20 times do you recall any one	25		check to see whether or not she had been involved in
	V	45	20		A7
2000		entropies of the second of the	-		47
1		time when the Mayor ever brought Marilyn Figueroa's	1	dys, 7	an accident. From the conversation I would assume
2	100	name to your attention in any manner?	2		that he was expecting her and she did not arrive,
3	A	Well, he may have said ask Marilyn about that.	3	ÇÊ B	and therefore it's possible that she may have had an
4		Marilyn may have been he may have made reference	4		accident. That's the tone of the conversation, the
5		to Marilyn, yes.	5		gist of the conversation I had with the Mayor as I
6	Q	And in what context?	6		recall it.
7.	Α	That's what I'm I don't, you know, all three of	7	Q	When he asked you to do that, based on your
8		us were there. On those occasions other people and	8		observation, did he seem to be worried about
9		Marilyn, he may have made reference to Marilyn. I	9		Marilyn?
10		just recall one time at Summerfest we had a deluge	10		Yes.
11		and Marilyn went to get the umbrellas. So I mean,	11		Did you ever get to talk to Marilyn regarding that
12		yeah, he's made reference to Marilyn, but I don't	12	~	particular trip to Chicago?
13		the answer to your question is yes, but I can't	13	Δ	No.
14		recall any details.	14		
15	Δ	•			11
	Ų	Do you recall any one time when the Mayor asked you	15		No.
16		to check on Marilyn or ascertain whether or not	16	Q	Do you recall the year when this democratic
17		Marilyn was going to be attending any type of event	17		convention took place?
18		where he was going to be present?	18	A	It was for the what election was it? Let me
19		Yes.	19		think. Would it be the '96 election?
20		Tell me when did that happen.	20	Q	When the Mayor traveled outside the city, did you go
21	Α	It was during the democratic national convention in	21		with him at all times?
22		Chicago. And the dates are nationally known. I	22	Α	It would have been the '96 election. I believe it
23		received a phone call from the Mayor and he asked me	23		was the '96 election.
24		if I would check to see if Marilyn had been involved	24	Q	Did you travel with the Mayor
25		in an accident on I-94 because he expected her to	25		•
		46		•	48
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	1	Q) .	for the most part?	1		And I said okay, I'll do that. And he gave me her
1	2			Yes.	2		home telephone number and I called her. And I spoke
	3	Q)	And during that 1996 election, do you know where he	3		with her. And we had a I would think our
	4			stayed?	4		telephone conversation was a half hour or so.
١	5	Α		No, no. Wait, wait. I traveled	5		And during that conversation and during
ı	6			MR. SCHRIMPF: Just for the record,	6		that conversation she was telling me that she was
1	7			I'm going to object based on foundation,	7		dissatisfied with her employment at the Mayor's
1	8			counsel.	8		office; that she believed that she was being
1	9	Q)	Go ahead.	9		discriminated against both because of race and
	10	À	١.	I traveled with the Mayor when he went out of town	10		gender. And then she asked me if we could have
	11			when I was the head of the Mayor's security. And I	11		lunch together, and I told her yes. And she asked
- 1	12			stopped doing that in 1991.	12		me if I would pick her up at the Mayor's office
	13	О		But to your knowledge, do his security officers	13		while we went to lunch, and I said yes. She even
	14	`	-	travel with him when he's out of the city?	14		asked me if I'd be wearing my uniform, and I said
	15	Α		Well, it's interesting. Yes and yes. Yes, they do.	15		yes.
	16			Not always. And nor did I always travel with him.	16		And I subsequently and I know this date
	17	O		So in 1996 you were not his security officer?	17		because I checked again this morning. On
	18	-	•	No, sir, I was not.	18		December 7th I picked Marilyn up at the Mayor's
	19			Correct? And is there a reason why he asked you to	19		office. I went into the Mayor's office and we left
	20	. `	-	check on what was happening with Marilyn at that	20		and went to lunch at a restaurant on, near 6th and
	21			time?	21		National next to La Perla's parking lot. I don't
	22	Α		Well, it was if I recall I was at home when I	22		recall the name of the restaurant. And so that was
	23			received the phone call, and it was either early	23	. 4	the telephone conversation.
	24			evening when he called. When I say well, maybe	24		All right. When you spoke to her, I suspect it was
	25	1.4		around, if I recall correctly, six or 7 o'clock, so	25		December of 1999? week to be to be to be an income of the control
ı				49			51
				a de la companya del companya de la companya del companya de la c	<u> </u>		the state of the s
1	4			I doubt know why he called me. All I know is that	1	Δ	The telephone call?
,	1			I don't know why he called me. All I know is that			The telephone call?
1	2			he did call mended as produced in the second	2	Q	Correct: was assessed to the first of the part of the
1		Ç		he did call me. During that era, 1996, did you feel pretty close to		Q	Correct: Yes. I think that we set up the lunch date no more
,	2 3 4)	he did call me. During that era, 1996, did you feel pretty close to the Mayor?	2 3 4	Q	Yes. I think that we set up the lunch date no more than two weeks, so I would say probably a week
,	2 3 4 5	A)	he did call me. During that era, 1996, did you feel pretty close to the Mayor? Yeah.	2 3 4 5	Q A	Yes. I think that we set up the lunch date no more than two weeks, so I would say probably a week earlier, maybe even a shorter period of time.
,	2 3 4	A)	he did call me. During that era, 1996, did you feel pretty close to the Mayor? Yeah. Did he consider you a good, close friend at that	2 3 4	Q A	Correct: Yes. I think that we set up the lunch date no more than two weeks, so I would say probably a week earlier, maybe even a shorter period of time. Any other times when you were asked by the Mayor to
	2 3 4 5	A	Q 1 Q	he did call me. During that era, 1996, did you feel pretty close to the Mayor? Yeah. Did he consider you a good, close friend at that time?	2 3 4 5	Q A Q	Correct: Yes. I think that we set up the lunch date no more than two weeks, so I would say probably a week earlier, maybe even a shorter period of time. Any other times when you were asked by the Mayor to call Marilyn Figueroa?
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	2 3 4 5 6 7 8 9 10 11 12	A C A C	Q A Q A Q A Q	he did call me. During that era, 1996, did you feel pretty close to the Mayor? Yeah. Did he consider you a good, close friend at that time? I don't know what he considered. Do you know? I don't know what he considered. You have no opinion? Well, we were friends, you know. Real close, very	2 3 4 5 6 7 8 9	Q A Q	Correct: Yes. I think that we set up the lunch date no more than two weeks, so I would say probably a week earlier, maybe even a shorter period of time. Any other times when you were asked by the Mayor to call Marilyn Figueroa? I was asked Mike Soika called me and said that the Mayor wanted me to call Marilyn after our lunch date. And Soika told me that Marilyn was going to file a lawsuit and that the Mayor wanted me to talk to Marilyn. And I told Soika that I had told
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Trains

	7		Deposition of Office Are			
	1	Α	And he said, you mean you're not going to do what	1		MR. SCHRIMPF: Then I will object
	2		the Mayor's asking you to do? And I said, that's	2		to the question, counsel, based on foundation.
	3		correct, I'm not going to do what the Mayor's asking	3	Q	When he asked you to call Marilyn regarding the
	4		me to do.	4	-	democratic convention in 1996, you did quite a bit
)	5	Q	Do you recall when this particular conference with	5		of investigation to determine whether or not Marilyn
	6	`	Mr. Soika took place?	6		had in fact been involved in an accident; correct?
	7	Α	It would have either been late December or early	7	Α	Well, quite a bit? I made phone calls. I made
	8		January. It wasn't long after I had met with, had	8		phone calls to the Wisconsin State Patrol and the
	9		lunch with Ms. Figueroa. So it would have been I	9		Illinois state police, and Marilyn's residence.
	10		would say within two, three weeks.	10	0	And did you ever find out whether or not Marilyn had
	11	Ω	Any other time when you were asked to contact	11	•	in fact been involved in a car accident?
	12	~	Marilyn Figueroa, Chief?	12	Δ	Well, she was not. Ultimately she was not involved
	13	Δ	No.	13	^	in a — well, she was not involved in an accident on
	14		Prior to December 1999, other than the Chicago	14		I-94 on that particular day. Whether or not she was
	15	Y	convention incident where the Mayor asked you to	15		involved in an accident other than that, I don't
	16		call Ms. Figueroa, any other time before	16		know.
	17		December 1999 when you were asked to contact	17	^	
	18		Ms. Figueroa by the Mayor or anyone representing	18		Did you inquire with the Mayor why he would perceive
	19		him?	19		that an accident had occurred? Did he explain in
	20	Δ	No. A SA A MAN AND STORY OF BOTH AND WAS THE SAME	20	. Λ	any way, form? No.
	21		When the Mayor asked you to call Marilyn Figueroa,			
	22		did you sense that he was asking you for a rather			Did you inquire with Marilyn as to why — No.
	23					
			personal favor?			she didn't go to the convention?
: 3			Well, personal inasmuch as it wasn't business. I			No. mela a membrana desarra del de la como d
2 (25:	AS I	mean he wasn't asking me to call as the chief of	20	Ų	Did you find it somewhat did that strike you as:
arreni.	<u> </u>		<u> </u>			55
1	4		matter transmission and the second section of the second			
l- i			police. He was asking me to call as Marilyn's	1.1		strange that the Mayor was suggesting or suspecting
I	2		police. He was asking me to call as Marilyn's friend and as his friend because I mean my	1 2		strange that the Mayor was suggesting or suspecting that Marilyn was not appearing at the convention
<i> </i>	2 3		friend and as his friend because I mean my	1	1 -53	that Marilyn was not appearing at the convention
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		Marilyn bring that down to you or something like	1		Ms. Barbara Candy. Do you know who Barbara Candy
2		that, and she didn't show up.	2		is?
1		•	3		Yes.
3	-	Did your views change with time as to what was			
4		happening?	4	Ų	And she testified that in her view she's of the
5		I still don't know what was happening referencing	5		opinion that if you cross the Mayor, he can have or
6		1996. But obviously from his, from what I know, and	6		take a strong reaction to people that cross him or
7		not from him still, that there was a relationship.	7		take the wrong side. And she testified that that's
8		And it could have been a relationship at that time.	8		her belief. Do you have any difference in that
9	-	And when you say it could have been, what leads you	9		opinion?
10		to say that?	10		MR. SCHRIMPF: I will object to the
11	Α	Well, he had mentioned that he had a relationship	11		question unless the witness is shown the
12		with Marilyn.	12		testimony to which you are referring and that
13	Q	You're just basing your	13		the witness has an opportunity to
14	Α	And that was a recent admission. And that	14		MR. ARELLANO: Did you get his
15		relationship could have gone back to the convention,	15	,	answer? His answer was no before the
16		the day of the convention, the time of the	16		objection.
17		convention. That's all I'm saying.	17	Q	Is that correct, Chief?
18	Q	So you're just basing your assumption here based on	18	Α	I didn't give an answer. You asked me when there's
19		what he has told the press?	19	100	an objection that I wait for a second. I was going
20	A	Right. What he has publicly admitted, yes.	20	100	to answer, but I did not answer.
21		On the other hand, Ms. Figueroa has claimed that he	21	Q	Well, the video will state. Well, let me tell you A ware
22	•	would constantly be calling her and she refused to	22	. k.j.)	what the record indicates, Chief.
23		go, and that time he could have also mean that was	23	disk.	MR. SCHRIMPF: I want the witness
24		one of the times that she refused to go?	24	75	sto read the testimony. I want to see the
25		That's possible, yes.	25		testimony myself. No, I want to see it before
		57			59
1		T. C. 1.24	4		you show it to the witness council
	Ų	In fact, it's more possible?	9	ę	you show it to the witness, counsel.
2	A Park	MR. SCHRIMPF: Object, no	2	. ;	MR. ARELLANO: Well, you've got
3			2		and the same and t
1 4	• 16.5	foundation.	3		your own transcript, counsel.
4		My answer is what my answer is. Everything I told	4		MR. SCHRIMPF: No, I don't I
4 5	4	My answer is what my answer is. Everything I told you is based on	5		MR. SCHRIMPF: No, I don't — I have the transcript. I don't have the
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6 7 8 9 10 11 12 13 14 15 16 17 18 19 20 21 22 23	Q A Q Q A	My answer is what my answer is. Everything I told you is based on Right, I'm not questioning you. No, but I'm saying my assumption at that time was that she was going to staff the Mayor because she worked on the Mayor's staff. It's possible, anything is possible. It certainly is possible that he had requested that she come down for other reasons in 1996. That's possible. But you stated that it could have been possible that a relationship occurred. But on the other hand, you have no evidence that would help us to determine that? No. I have no evidence even on my original hypothesis that she was going down to staff him. I have no evidence that that was the case. And I have no evidence of any other reason why she may havehe may have expected her. In fact, if Marilyn alleges that he imposed himself on her, you have no basis to disclaim that?	4 5 6 7 8 9 10 11 12 13 14 15 16 17 18 19 20 21 22 23 24		MR. SCHRIMPF: No, I don't — I have the transcript. I don't have the transcript of Ms. Candy along. MR. ARELLANO: Well, counsel, I've got my own materials and now you're asking me to produce materials to you? MR. SCHRIMPF: I did not think that the transcript of Ms. Candy was going to be particularly relevant at this time so — MR. ARELLANO: Well, why do you think I travel here with boxes and boxes? By now you should have a hint. MR. SCHRIMPF: Well, counsel, I want to see the testimony. MR. ARELLANO: There you go, there you go. Take it back. MR. SCHRIMPF: Counsel, what page are you on? MR. ARELLANO: 109. MS. GARCIA: I don't think that's

	Deposition of Office Al	
	stand up here. Get yourself up, come over	1 known her at least professionally for a number of
2	here. We can read it for you. Just put it	2 years?
3	right here.	3 A Yes, yes.
4	MR. SCHRIMPF: Let me read this	4 Q You have socialized at least professionally with
5	please.	5 Ms. Figueroa?
6	Q I'm directing your attention, Chief, to page 109,	6 A I've socialized only professionally.
7	the deposition of Barbara R. Candy. Are you	7 Q Professionally, good. Do you recall any one time
8	familiar with Ms. Candy?	8 when you felt during discussions or exchanges you
9	A Yes.	9 may have had with Ms. Figueroa, do you recall any
10	Q You believe Ms. Candy to be a respectable, honorable	one time when Ms. Figueroa was not truthful?
11	person in the community, based on your observations	11 A No.
12	and knowledge?	12 Q Any one time when you felt that Marilyn Figueroa
13	A I have no reason to believe that she's not.	acted in a promiscuous fashion in front of you or in
14	Q I asked Ms. Candy the following question: Question	14 public?
15	on line 3:	15 A No.
16	"Q Do you know if Ruth or any other staff	16 Q Ms. Barb Candy describes Marilyn Figueroa, at least
17	member are afraid of the Mayor?	based on her contacts with her, as an extremely hard
18	A Not Ruth.	18 working, effective individual if her role as a
19	Q What about you?	19 community person. Do you have any different
20	A Me? No, no.	20 opinion?
21	Q I like that reaction. Hell me? No, okay.	21 A No. No, none whatsoever.
22	You mentioned earlier that the Mayor has a	22 Q How would you describe Ms. Figueroa, Chief?
23		23 A Intelligent, dedicated, loyal, hard working,
24	people that cross him or take the wrong	24 sincere as unique says a
25	o on quisidence, many recognition of the state of the second	25 Q One of the claims that Ms. Figueroa has made in her
	<u> </u>	63
1 .	An Yes."	1 various complaints against the City and the Mayor is
2	Based on the number of years that you have	2 that in the past she has opposed what she viewed as
3	worked and known the Mayor, do you disagree with	discriminatory policies by the police department
4	that view, Chief?	towards people of color. And to be more specific in
5	A No, I do not disagree.	5 her claim she feels that there were times when the
6	Q In fact, I can represent to you as an officer of the	6 Mayor attempted to implement policies that
7	court that Ms. Barbara Candy even mentioned	7 A Earlier you said the police department.
8	individuals that have in her view been affected by	8 Q Well, the Mayor attempted to implement through the
9	the Mayor's anger. Do you know of any specific	9 police department
10	incident where you believe the Mayor retaliated	10 A Oh, okay.
11	against someone because of espousing different	11 Q policies that would target minority areas in the
12	views, including you?	city of Milwaukee such as implementing policies that
13	A That's the person I was going to mention. Yes, I	would require stopping minority individuals when
14	believe I believe that he's been retaliatory	they gather in numbers of two to three or four at
15	against me as a result of	once. Do you recall any one time when that issue
16	Q Certain positions you have taken?	16 was mentioned or in fact was implemented by the City
17	A Yes.	of Milwaukee since you've been a police officer in
18	Q How long have you known Marilyn Figueroa, Chief?	18 one capacity or another?
19	A I can't recall specifically meeting Marilyn, but I	MR. SCHRIMPF: Object because there
20	do know that I met her as a result of her employment	is no foundation for that question.
21	in the Mayor's office. And the years I would say	21 Q Go ahead, sir.
22	when she began her employment, and I can't remember	22 A Well, I have personally filed lawsuits against the
23	exactly when that was. That's when I met her. And	23 City for what I believe to be discriminatory
24 25	then over time I've seen her.	practices by the Milwaukee Police Department, so the
23	Q And is it fair and accurate to say that you have	answer to part of your question is yes. The Mayor
L	62	64

	ase compless Deposition of Chief AR	177	TUR L. JUNES 2/25/02 Sheet 1/
11	had indicated to me that he wanted me to engage as	1	Whatever date you choose when you choose a
2	the chief of police in practices that I thought	2	· ·
3	would be discriminatory and illegal, and I told him	3	determine whether or not I'm available.
4	that I would not.	4	Because I schedule
5	Q As a result of	5	MR. ARELLANO: Okay. We'll work
6	A As it relates to the African-American community and	6	,
7	the Hispanic community.	7	THE WITNESS: Yes, that will be
8	Q As a result of your disagreement with the Mayor, did	8	
9	you notice any type of negative reaction towards you	9	,
10	for opposing such suggestion to, in a sense	10	, , , , , , , , , , , , , , , , , , , ,
11	suggestion to implement policies that you viewed in	11	` ' '
12	your good faith actions you viewed that as	12	, i
13	discriminatory?	13	
14	A Well, I believe that he retaliated and is	14	, , ,
15	retaliating against me as a result of me telling him	15	, , , , , , , , , , , , , , , , , , , ,
16	no, yes, I believe that.	16	
17	Q Ms. Marilyn Figueroa also complains that during her	17	U - ,
18	employment with the City of Milwaukee she opposed	18	
19	targeting African-Americans simply because a person	19	
20	had committed a crime, and the Mayor had demanded	20	
21	according to Marilyn that all African-Americans in	21	,
22	- 1 - 1 - 1 - 1 - 1 - 1 - 1 - 1 - 1 - 1	1	
23			
24			but I didn't raise it as being discriminatory.
25	· • • • • • • • • • • • • • • • • • • •	∠5	5 Q And when you say illegal, are you referring
	65		5/
1	the one that you just mentioned?	1	A Search and seizures.
2	A Let me answer it this way. I don't know what	2	
3	Marilyn, a conversation Marilyn may have had with	3	
4	the Mayor regarding, in the context of the question	4	
5	that you just asked. I have no knowledge of whether	5	
6	or not Marilyn opposed that. I can only answer the	6	
7	question as I answered it before, that the Mayor has	7	1 /
8	come to me with several proposals referencing	8	0 00 11 1
9	policing in the African-American and Latino	9	,
10	community, minority communities of Milwaukee which I	10	
11	was opposed to. And it had to do with traffic	11	3 0 1
12	stops. It had to do with searches and seizures. It	12	11
13	had to do with policing of that nature in those	13	0017
14	particular locations, which I opposed.	14	
15	Q And these suggestions that he made to you were not	15	, ,
16	made with respect to the Anglo or white communities	16	±
17	in Milwaukee?	17	1 7
18	A That is correct.	18	
19	MR. ARELLANO: Let's take a couple	19	, , ,
20	minutes break, Chief. As I understand it, you	20	0, , , ,
21	have to leave around the noon hour and then we	21	_
22	can look at our calendar and see when will be	22	
4	another date when you'll be available to cover	23	,
23		24	4 reads the record, they don't have the benefit of me
24	different aspects that I have for you.		_
	THE WITNESS: Let me just say this.	25	
24	<u>.</u>		_

	Ca	se u	Compress Deposition of CHIEF AR	HI	JR	L. JONES 2/25/02 Sheet 18
ſ	1		the policies would have resulted in disparate	1	Q	And is it
١	2		treatment. However, I would phrase it more as being	2	A	My race being African-American, yes.
1	3		what he wanted me to do as being illegal, and	3		And is it also on the basis of your opposition to
1	4		probably illegal in the area of racial	4	`	what you view discriminatory practices, policies
1	5		discrimination, yes.	5		that the City wants to implement, that you find
	6	Ω	Do you recall whether or not, based on your	6		disadvantageous to, or at least that would impact
۱	7	V	knowledge, whether or not former Chief Arreola faced	7		negatively on the treatment of minorities in the
1	8		similar debates or disagreements with the Mayor?	8		City of Milwaukee?
1	9	Δ	I have no knowledge of that.	9	Δ	
1	10		Do you have any knowledge as to why Chief Arreola	10	^	Generally, yes. Without, you know, specifically
- 1		V	,	,		delineating the Mayor, the chairman of the
	11	۸	left the City?	11		Fire & Police Commission or certain alderman, I'd
	12	А	Why he left the City? He left the City because he	12		say, overall, it's in opposition it's as a result
- 1	13		was no longer a police chief and he got another job.	13		of them opposing the policies that I've implemented
- 1	14		That's what I believe. And his term was up. He had	14		in the police department, and some of them with
	15	_	a seven-year term.	15	_	respect to race and gender for that matter.
	16	Q	Do you recall any one time when Chief Arreola may	16	Q	Objectively speaking, Chief, how would you reconcile
- 1	17		have taken similar positions as you are now, meaning	17		the fact that you were appointed and recommended by
	18		claiming that the City of Milwaukee had	18		the Mayor and now you take the position that somehow
	19		discriminatory practices or wanted to implement	19		he and the council and members of the fire
	20		discriminatory practices that would affect	20		commission view you negatively because of your race?
	21		negatively to the minority communities in Milwaukee?	21		Well, let me just start by I was not appointed by
- 1	22	Α	I have no specific knowledge of that. As it relates	22		the Mayor. I was recommended by the Mayor. I was
•	23		to a conversation with the Mayor?	23		appointed by the Fire & Police Commission. The fact
- 1	24	-				of the matter is is that right now not one of the
1	25	Α	I have no specific knowledge of that, no.	25	HA (A)	commissioners that sits on the board now was
	. 70.31.44	المواد	69	a Antorior		71
Ī	1	0	Has your opposition to some of these what you view	:1>		commissioner when I was appointed. I think it's
1	2	1 1	potential disparate treatment with respect to	2		based on the fact that, of my opposition to some of
1	3		implementing police work within the City of	3	12.4	the recommendations of the Mayor and his attempt to
1	4		Milwaukee, has some of this been used in your view	4	4	remove me as chief of police because of that
1	5		by the City and/or Common Council to criticize your	5	e 1	opposition.
1	6		performance as a police chief?	6	0	Let me go back to a couple things that you
1	7		MR. SCHRIMPF: I'm going to object	7	Y	mentioned. You mentioned that sometime in late 1999
ı	8		to the question insofar as I think it assumes	8		you had a telephone call discussion with
1	9		facts that are not in evidence.	9		Marilyn Figueroa for about a half hour as I
١	10	Ω	Go ahead. And let me put some facts in evidence.	10		understand it.
- 1	11	_	Well, okay.	11		MR. SCHRIMPF: Object as to not
	12		I read recently that the Common Council or at least	12		accurately reflecting the facts in the record.
ł	13	Ų	members of the Police & Fire Commission, at least	13	Λ	Go ahead. I believe that's what you testified.
	14		one of them was quite critical of your performance.	14		I called Marilyn Figueroa at the behest of the
	15		Is that a fair and accurate description of what the	15	^	
	16			16		Mayor, and that telephone conversation could have
	17		press has indicated?	17	^	lasted a half an hour to 45 minutes.
			MR. SCHRIMPF: Object in the sense		Ų	And do you recall if that was after Marilyn had I
	18 10		that counsel is testifying as opposed to	18		suspect it was after Marilyn had left the job by
	19	_	asking a question.	19		virtue of the fact that the Mayor was concerned
	20	Ų	You'll never find two lawyers that will agree on	20		because she was not coming back?
	21		anything, but go ahead, Chief.	21	Α	It could not have been before Marilyn left the job,
	22	Α	I believe that the reaction of the Mayor, the	22		because I picked Marilyn up in the Mayor's office
	23		chairman of the Fire & Police Commission, the	23		after the telephone conversation. Well, the
	24		members of the Common Council, their reaction to me	24		conversation I had with the Mayor was regarding
	25		as chief is based on race.	25		Marilyn not showing up for work, but certainly she
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	Case	Compress Deposition of CHIEF AR	TH	UR	L. JONES 2/25/02 Sheet 19
	1	showed up for work on the day that I picked her up	1	Q	When she related these concerns to you, what, if
I	2	to go to lunch.	2		any, response did you have, if any?
ļ	3 (So what time frame are we talking about if you	3	Α	Well, those things that I agreed with her on I told
)	4	recall? Was it in 1999 or January?	4		her I agreed with her. Those other things I told
		A It was in 1999. I went to lunch with her on	5		her I didn't know. I mean it wasn't a
	6	December 7th of 1999.	6		question/answer, but a lot of the things that she
١		Okay. And tell me as best as you can what exactly	7		was telling me I understood.
1	8	is it that the Mayor said to you before you decided	8		Now, I may have some problems here
	9	to call Marilyn Figueroa on his behalf?	9		differentiating between the telephone conversation
		He said to me, you know, after the obligatory	10		and the luncheon conversation.
	11	hellos, I understand that, or I believe or I	11	0	Okay.
ı	12	understand or I've witnessed that you and Marilyn,	12		Just so I don't but, for instance, the system of
ı	13	meaning me and Marilyn, are friends. And I said	13		senior staff and not senior staff in the Mayor's
1	14	yes. And he said, well and this is paraphrasing,	14		office, I mean I was there. I witnessed how the
	15	I'm not quoting he said, well, she hasn't been	15		closer you sit to the Mayor's office, the more
	16	showing up for work, and I was wondering if you	16		influential it's perceived that you be I know she
	17	would call her and talk to her about that.	17		was interested in the job that Brenda Wood had that
i	18	Now, the conversation was longer than that,	18		I believe that Michal Dawson had prior to
	19	but that's the gist of the conversation. And I told	19		Brenda Wood having the job. And I understood what
	20	him that I would call her, and he immediately gave	20	, : ·	that position was and that she was desirous of
	21	me her home telephone number.	21	: 15	having that position, or she may have been promised
		And how soon after you had that discussion with the	22	- 1.6	that position. This is our conversation prior to
	23	Mayor did you receive a phone call from Mr. Soika?	23		Brenda Wood getting it, but Brenda Wood got it.
	24	Was that several weeks later?	24	: :	I believe that she had mentioned that she was
	25	A Yes. It would have been it was after the lunch	25	it i	offered a job in the administration, I forgot - I'm
		73			75
}	1	and either late December or early January.	1		thinking bureau because that's police jargon, but
		And obviously you did make contact with Ms. Figueroa		[thurst	it's the Department of Administration at City Hall,
	3	in December when the Mayor requested that you	3	i Nate	and for some reason she didn't get that.
	4	intervene?	4		We discussed her then working part-time for
	5	A As soon as I disconnected with the phone call from	5		Christofferson, and this was in a more political
	6	the Mayor I called Marilyn.	6	;	mode. I believe she told me she was working
	7	Q And describe for me the nature of your discussion	7		part-time at the Mayor's office and part-time for
	8	with Ms. Figueroa.	8		Christofferson and that Christofferson was a racist.
	9	A I informed her that I had information that she	9		And she told me the reasons why she believed he was
	10	hadn't been showing up for work. First I said, you	10		a racist.
	11	know, if you want to talk to me about this, fine.	11		And I know we had conversation wherein she
	12	If you don't want to talk to me about it, I	12		asked me if I thought the Mayor knew, you know,
	13	understand. And she said she didn't mind talking to	13		specifically what was happening to her with respect
	14	me about it.	14		to job promises and jobs not being given to her.
	15	And she went on to tell me how she believed	15		I had told her that during the lunch I
	16	she was being subjected to gender and race	16		believe it was during the lunch that
	17	discrimination, that she was denied employment	17	(Before we get to the lunch, let's go back to the
	1		140		

opportunities within the Mayor's office, specifically she mentioned Brenda Wood, Christofferson. And generally we talked about the Mayor's staff and what happens in the Mayor's office because obviously we're both familiar. The specifics I don't recall.

And during the conversation she suggested that we have lunch. And I said that's fine.

22

A That's correct, that's correct.

phone conference.

Q When you talked to her over the telephone the first 23 time, were you able to sense her emotional state? 24 Was she crying? Was she upset? Was she -- were you 25 able to describe -- are you able to describe how she

A Well, I don't -- I'm telling you now, I don't --

Q But in essence the same issues were raised?

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	ase compless Deposition of Chief Ar	Sheet 20
1	was, how she sounded to you based on your own	1 Q And I understand that. And you have clarified that
2	perception?	2 for the record.
3	A I would say frustration.	3 A Okay, okay, okay.
4	Q Did she at any time cry during that time?	4 Q But did you get the sense based on your discussion
5	A No.	5 during the telephone conference and/or during the
6	Q Did she tell you she had many problems other than	6 lunch hour, that she had more problems than just she
7	what she explained to you over that phone	7 was leading you to believe at work?
8	conference?	8 A No.
9	A Well, I wouldn't describe it as problems. But I	9 Q And why do you say that?
10	think that, you know, she said, and I acknowledged I	10 A Well, because I can't think of anything
111	believe she has two children, and I was saying to	distinguishing that would make me think that she's
12	her, you know, I know I know I said to her that	having more problems. I think in my perception at
13	not going to work is probably not the best thing to	the time was that that was enough. You know, what
14	do because if you don't show up for work, you're	she was telling me was enough to have her at the
15	going to be fired. I mean you're probably going to	level of being upset or frustrated as she was.
16	be fired or you're going to be fired. So I recall	16 That's why.
17	saying to her that probably it's in her best	17 Q Once you finished your phone conference with
18	interest and that of her children, and I think	18 Ms. Figueroa, did you report that to the Mayor?
19	during the conversation she agreed that, at least	19 A I'm trying to remember that: I did call the Mayor
20	she agreed that not going to work would have an	20 and I did call Christofferson. And I told Marilyn
21	adverse effect on her family. So I don't look -	21 that I would call both of them and tell them what it
22	that would be a problem, but I wouldn't categorize	is that she had told me that she was concerned about
23	it as a problem at the time that we had the	23 during our conversation. I told her that I would
24	conversation.	24 call the Mayor and I would tell the Mayor what she
25	My overall advice to her was to go to work and	25 told me about her dissatisfaction with not being
	77	79
1	then work on whatever other problems may exist in	1 promoted, with Brenda Wood. And I called
2	the office.	2 Christofferson and told him that – because I told
3	Q Did she ever mention during that phone conference	3 her that I would — that he was a racist and why she
4	that she was having problems with the overall	4 felt that that was the case.
5	environment of the Mayor's office?	5 Now, I know I believe I made those
6	A Yes. And I thought I'd mentioned that. And that	6 conversations, I made those telephone calls after
7	was with respect to the status of senior staff and	the lunch. But I may have very well talked with the
8	not being a senior staff person, with promises being	8 Mayor after the telephone conversation too. But I
9	made and not kept didn't make her feel very she	9 know for sure I talked with him after the lunch and
10	didn't feel very well about being at work and going	10 I talked with Christofferson after the lunch.
11	to work; that she was dedicated to John Norquist;	11 Q Before we go into your discussion with both the
12	that she worked very hard for him, especially in the	Mayor and Christofferson, tell me did Marilyn
13	Latin community and also the African-American	describe for you why she felt Christofferson was a
14	community.	14 racist?
15	I recall her saying that, you know, she set up	15 A Yes, she did.
16	various meetings with African-American ministers for	16 Q What did she say?
17	the Mayor and that she worked very hard at that, and	17 A I don't recall. I mean I specifically don't recall.
18	for the most part she didn't get any credit for what	18 But she told me, she cited for me instances, both
19	it is that she was doing for the Mayor in the	interaction between he and her and his general
20	Mayor's office.	persona and her interaction, and observing him with
21	Q Did you sense at all during this telephone	interaction with other people and in policy
22	conference that she had	decisions. So it was more of a general sense that
23	A Well, now, again, I can't differentiate between the	l
24	telephone conversation and the luncheon	I The state of the
25	conversation.	o die
	78	25 Mayor your discussion with Marilyn Figueroa. What 80
	/ 0	

1 was his response, if any? 2 A Okay. I mean generally okay. I mean I don't think 3 he asked me — I don't recall him denying or 4 agrecing to anything. I just — I told him what 5 Marilyn had told me. And I didn't tell him the 6 whole conversation, but I told him those things that 7 I told Marilyn I would tell him. 8 Q And again, do you recall if your conversation with 9 the Mayor regarding informing him what 10 Marilyn Figueroa had shared with you, did that occur 11 after Marilyn Figueroa left in January 4th or before 12 that? Was she still working? 13 A I would be — it would be — it was after 14 January 7th — oh, no, I had the lunch with her 15 December 7th. It was after December 7th lunch. 16 Q So it would have been before 2000? 17 A Yes. It would have been before 2000? 18 after the lunch. So — and that would have been 19 like on the 8th. It would not have — it may have 20 even been on the 7th. 21 Q When you spoke to the Mayor about Marilyn's 22 concerns, was anyone else present? 23 A No, not on my part: This was by telephone. 24 Q Did you suggest anything to the Mayor or to Mr. Christopherson? 4 A No. 5 Q Marilyn Figueroa alleges that on at least on occasions Mayor Norquist agreed with her of his staff within the Mayor Norquist agreed with her of his staff within the Mayor Soffice were so raist. And I'm just paraphrasing here. I de know any of these folks. Did the Mayor even similar views with you about his staff? Did say to you, I've got some people here in my that have different views about culture or part that have different views about culture or part three years I spent a considerable amount or with the Mayor. We traveled almost every to say that he never mentioned that, I would in would not have been like on the 8th. It would not have been like on the 8th. It would not have been like on the 8th. It would not have been like on the 8th. It would not have been like on the 8th. It would not have been like on the 8th. It would not have been lit would not have been like on the 8th. It would not have been lit	or two hat some omewhat on't or share he ever staff eople, use for f time day. So I say — about a d
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2 Marilyn Figueroa's concerns? 2 Marilyn Figueroa.	th .
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3 A I gave Christofferson more Christofferson specific 3 A Okay.	
4 information. I gave the Mayor Mayor specific 4 Q Tell me how the whole thing developed. I	id you pick
5 information and I gave Christofferson Christofferson 5 her up	et in g
6 specific information. I may have told the Mayor, I 6 A Yes.	
7 know I may have intimated told the Mayor, not 7 Q at her home?	
8 intimated told the Mayor what she also said about 8 A No. At the Mayor's office.	
9 Christofferson. 9 Q At the Mayor's office?	
10 Q What was the Mayor's reaction with respect to 10 A Yes.	
Marilyn's views of Christofferson? 11 Q Do you have any idea as to when that occu	rred?
12 A I don't think he, he said much either way. That's 12 A Around lunch time.	
what I was going to tell you before you stopped me. 13 Q December?	
14 But I don't recall him I recall him listening 14 A Oh, it was December 7th.	
more than commenting. I don't recall him saying 15 Q And was anyone else with you folks?	
16 anything. 16 A No.	
17 Q Reacting? 17 Q Just you and Marilyn?	
18 A Right. 18 A That's correct.	
19 Q What did Mr. Christofferson say, if anything, in 19 Q Where did you go?	, .1
20 response to your disclosure of what Marilyn Figueroa 20 A To a restaurant which was on 6th Street ju	
21 had told you? 21 of National, next to La Perla's's parking lo	•
22 A Same thing. I think it was basically the same 22 Q Was that Arteaga's restaurant?	
23 thing. Like okay. That's what she said? Okay. 23 A I don't recall that.	
Law and the state of the state	
24 Q Did you suggest that anything be done with respect 24 Q Was it a Mexican restaurant?	
Land, Divide of the country of the c	

			2 - position of other 7 to			
	1	Q	And you mentioned that you came in full gear,	1	Α	Good, good. That's I told her I mean I think
	2		uniform?	2		the whole she was confiding in me what she did
	3	A	I was in uniform and I had all my gear with me. It	3		confide in me because she knew that I, the Mayor and
	4		was a different uniform than I have on right now.	4		I had a relationship and that I could converse with
۱ ا	5	Q	And do you recall, can you describe what was	5		him and tell him what was going on. And I told her
	6		Marilyn's demeanor at that time when she was talking	6		that I would. I told her that I would tell him what
	7		to you?	7		was going on.
ļ		Α	Well, yeah. It was well, when we originally,	8	Q	Is it fair and accurate to say, Chief, that after
	9		when I originally went to pick her up, she was in a	9		that lunch meeting, that was the last time you had
	10		very jovial mood, very happy mood. She was smiling.	10		any contact with Marilyn Figueroa?
	11	_	We were talking.	11	Α	No, that's not true.
	12		Did that ever change during the discussion?	12	Q	Tell me when would have been the next contact.
		А	Yes. When we were actually having the discussion.	13	Α	The next contact I had with Marilyn, I was on the
	14		Again, she was very serious. I could sense, and I	14:		governor's committee for racial profiling. And
	15		can only use the word again frustration. She felt,	15		William Clay, who he's either the chairman or the
	16	Λ	I would say she felt rejection, broken promises.	16		president of OIC and he was also on the governor's
1	17 10	Ų	Did she ever tell you that there were other problems	17		commission for racial profiling, and that he was
	18 19	Δ	at work with the Mayor? No:	18 19	- 3	tasked with a subcommittee which I was a part of,
	20		Did she ever allude to having some serious health	20		and there was a meeting at the OIC headquarters for this subcommittee. And I attended that meeting and
	20 21	-	•	21	194 A	Marilyn was present.
	22					Did you have any type of discussion as a follow-up
	23		Abdominal things?			of the previous conversation that you had of her
			Non constant to the second of the			problems at work?
	25					No. When the meeting was over?
		~	85			87
\	<u></u>	Λ.	note de la companya de la companya del companya de la companya del companya de la companya del companya de la companya del companya de la companya del companya de la companya del companya del companya de la companya del com	1		Distriction of
' .				2	•	Right:
	2	Y	Did you get to complete the entire meeting or discussion, at least based on the time that you had	2	:::.,. ∧ :	Marilyn and I hugged and I said to her hang in there:
	4		with Marilyn?	4		MR. ARELLANO: She asked me to
	5	Α	Yeah, I don't think we were under any real time	5		remind you that we need to change the tape.
	6	• •	constraints.	6		THE WITNESS: Oh, okay.
1	7	0	Do you know how much time you spent with her?	7		MR. ARELLANO: Okay. Why don't we
	8	-	An hour. Perhaps an hour and a half if we're	8		do that.
	9		talking from pickup to drop-off. I don't mean that	9		(Discussion off the record)
	10		in a negative sense.	10	Q	Chief, you mentioned that you had another encounter
	11	Q	Now, did you disclose to Marilyn Figueroa before the	11		in relation with the OIC meeting?
	12	•	lunch meeting whether or not you had spoken to the	12	Α	Yes.
	13		Mayor about the previous phone conference?	13		Was that the last time you had any contact with
	14	Α	I never told Marilyn that I had a conversation with	14		Marilyn Figueroa?
	15		the Mayor at all because I debated if she asked	15	Α	That is correct.
	16		me when I told her that I had heard that she was	16		Going back to the lunch that you had with Marilyn on
	17		having problems at work, she never asked me who had	17		December 7th of the year 1999, do you recall why was
	18		mentioned that. So I never said it was the Mayor	18		there a need for a second meeting after you talked
	19		that called me.	19		to her for the first time via telephone on behalf of
	20	Q	Did you ever disclose to Marilyn Figueroa that you	20		the Mayor? Was there a special reason why you felt
	21		would be reporting to the Mayor	21		that a follow-up meeting would be helpful, required,
	22		Yes.	22		needed?
)	23	_	your discussion to the Mayor?	23		Yes.
	24		Yes, I did.	24	•	What was that?
	25	Ų	What, if any, was her reaction to that?	25	A	She asked me.
	Ī		86	1		88

1	Q	What did she tell you she needed to talk to you	1		shy type, type A personality like you and I?
12		about?	2		MR. SCHRIMPF: Objection,
3	Α	No. She said why don't we go to lunch. And I said	3		foundation.
4	_	okay.	4		Well, you and I?
5	Q	Do you recall any other time when you went to lunch	5	-	You don't survive in this world
6		with Marilyn Figueroa?	6		No, I don't I would not categorize Marilyn as
7		Never.	7		being aggressive. I believe that I've used most of
8		Before that time?	8		the adjectives that I think are applicable to
9		Never.	9		Marilyn's personality. She's been she's
10	Q	And is it fair and accurate to say that your	10		soft-spoken. She's always been nice to me. And
11		involvement up to this point was initiated by the	11		I've never seen her aggressive or angry; other than
12		Mayor when he asked you to get involved in some	12		as I've testified, I believe she was upset about her
13		fashion?	13		working conditions.
14		That is correct.	14	Q	Marilyn has made some serious allegations against
15	•	Is that correct?	15		the Mayor based on what she went through while she
16		Yes.	16		was performing for the City of Milwaukee. Do you
17	Q	When you were at the lunch meeting, did there come a	17		have any basis or reason to believe that she would
18		time when other police officers entered, detectives	18		lie or create a big lie such as the one that you
19	1	entered the restaurant?	19		have seen in the newspapers or in her complaints?
20	Α	There may have been, yes. There were yes, I	20		Well - State of the state of th
21		believe there was.	21		Do you have any basis?
22	Q	Do you recall whether or not the discussion between	22		MR. SCHRIMPF: Object, foundation.
23	1	you and Marilyn Figueroa was stopped because of the			I mean you testified you read the allegations that
24	i i e	appearance of these police officers?	7	4	she has made.
25	A	I can't remember whether or not I spoke to them or	25	. А.	Ilve read the allegations. I've read the admission.
		89			91
1		they came over and spoke to me, but there was also	1	y	So I certainly don't believe that for those things,
2	5. j.	other people that came in and stopped and spoken. I	2		other than are disputed by John Norquist because I
3		believe she introduced me to the owner of the	3	·	have no basis for those things that she says
4	: .	restaurant.	4		happened, that he says happened, and I certainly
5	. Q	Of the restaurant?	5		don't believe, you know, any part of that is untrue.
6	Α	Yes. So there were times when our conversation was	6		Those things that are in dispute, I have no reason
7		interrupted.	7		to believe that she's lying.
8	Q	I've known Ms. Figueroa for some years when she was	8		•
9		a young lady and then I didn't see her until	9		Yes.
10		recently. And I happen to describe her as a rather,	10	Q	Was that before Marilyn left on January 4th or after
11		in spite of all this political involvement, as a	11	_	she had already left her position with the City?
12					
1		rather shy person when it comes down to personal	12	Α	Well, let me preface this by saying I didn't know
13		things. How would you describe Marilyn when it	13	Α	she left on January 4th. But I do know that the
14		things. How would you describe Marilyn when it comes down to personal things, disclosing things	13 14	Α	she left on January 4th. But I do know that the conversation did not that the telephone call I
14 15		things. How would you describe Marilyn when it comes down to personal things, disclosing things that are private in nature?	13 14 15	А	she left on January 4th. But I do know that the conversation did not that the telephone call I received from Mike Soika was not long, and long is a
14 15 16		things. How would you describe Marilyn when it comes down to personal things, disclosing things that are private in nature? MR. SCHRIMPF: I will object to	13 14 15 16	А	she left on January 4th. But I do know that the conversation did not that the telephone call I received from Mike Soika was not long, and long is a relative term, after the lunch and my subsequent
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	1	Q	Is that correct?	1	Q	At that point Mr. Soika notifies you that at least
	2	Α	That is correct.	2		in his mind he's aware that Marilyn Figueroa is
	3	0	And what did you understand Mr. Soika was asking you	3		going to file a lawsuit by virtue of what he was
- 4	4	`	to do?	4		telling you?
)	5	Α	I interpreted I interpreted actually both	5	Α	Yes. That's not yes in answer to your first
	6		conversations, you know, to find out what's going	6		question. And yes in answer to your last question.
	7		on. In the first conversation, the call I got from	7	0	Which is that he knew
	8		the Mayor was more, you know, you're friends and,	8		Because in your first question you were saying the
	9		you know, what she's doing is not really a good	9	• •	City had notice and you were saying other things. I
	10		idea. And if you could intercede as a friend and	10		don't know what the City had. I can only answer
	11		then talk with her, you know, perhaps she can come	11		your second question with respect to what he had
	12		back to work and everything will be okay.	12		said to me.
	13		When Soika called me and told me that she's	13	Λ	All right. That's a fair, a fair
	14		going to file a lawsuit, and then I took it as, you	14	V	MR. SCHRIMPF: Now, Mr. Arellano,
	15		know, call her up and find out if, you know, like	15		I'm happy.
	16		where is her head at, is she really going to file a	16		MR. ARELLANO: We'll get there.
	17		lawsuit, you know, what is would you find out for	17	^	When Mr Soiles contested you was he would be for the
14	18		the Mayor what it is that Marilyn is going to do and	18	V	When Mr. Soika contacted you, was he working for the City of Milwaukee?
2 2 2 2 2	19			19	Λ	
7 (1) (1) (1) (1) (1) (1) (1) (1) (1) (1)			perhaps why? And so that's the way I took those.	20		Yes, he was chief of staff of the Mayor.
			Did you When I told him no, he became	21		And when he called you, did he tell you he was
1997 N 1997 N 1998 N 19			somewhat upset. You know, like are you really	22		calling not as an agent for the City?
						He was calling on behalf of the Mayor.
			telling me you're not going to do this?			So he represented the office of the Mayor when he
			Did you sense that Mr. Soika was almost directing you on behalf of the Mayor to try to talk to			called you?
NAV SALLE AND AND SALLES	23	7 14	93	23	::: - ^	He told me the Mayor told him to call me. Well, he 95
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a levisoremente		-	participated by the control of the c	+		de la desta de la desta de la composición de la composición de la defensa de la composición del composición de la composición del composición de la composición del composición de la composición del composición de la composición
a Santration de la La Carlos	1	i an	, U	-1		told me that the Mayor wanted him to he was
	1		Yes. १ १० वेली स्वीक्षकार करते हुन विकास सिंह 👉 हे रावन है जिल्लाकी है।			told me that the Mayor wanted him to he was calling me on behalf of the Mayor.
	1	Q	Yes. More than just a favor?	2	11.	
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11	directive, if that is what he was giving you, once	1 would depend on the conversations. But I had told
2	he mentioned that Marilyn was going to be filing a	2 her that I would not call her anymore, and I meant
3	lawsuit?	3 that. I mean I personally knew that I would not do
4	MR. SCHRIMPF: I'm going to object	4 that. And then if you put on top of that the fact
5	as asked and answered now I think four times.	5 that she was, he told me she was going to file a
6	Q Well, go ahead.	6 lawsuit, then there's just no way that I was going
7	MR. SCHRIMPF: But subject to the	7 to do it. And I did not offer by way of explanation
8	objection, he can answer it a fifth time for	8 anything other than I was not going to call her.
9	all I care.	9 Q Is it fair and accurate to say, Chief, that since
10	A Well, I personally filed a retaliation lawsuit	10 you've known Marilyn Figueroa in a professional
111	against the City of Milwaukee. I have had	11 basis you have been the chief of police?
12	retaliation lawsuits filed against me as Chief. I	12 A No.
13	know what can be perceived as retaliation. And I	13 Q If she started working in 1991, '92 for the office
14	also know my position as chief of police. And I	14 of the Mayor oh, that's right. You didn't
15	know that for me to call someone who is threatening	15 start
16	or alleging or has filed a lawsuit against the City	16 A I didn't become chief until 1996.
17	of Milwaukee, and to have a discussion with them	17 MR. SCHRIMPF: Just so it's clear
18	regarding the substance of that lawsuit, could be	18 for the record, I'm going to object to the
19	perceived as retaliation. And I did not want to	19 question based on foundation laid and the
20	become part of a lawsuit, and the only part would be	20 facts of the record.
21	my, the perception or the allegation that I called	21 MR. ARELLANO: We've already
22	to somehow have an impact on someone's decision to	resolved the dispute over here, but that's all
23	file a lawsuit.	23 right.
24	Q Did you explain those feelings, those views to	MR. SCHRIMPF: I figured you would.
25	Mr. Soika?	25 MR. ARELLANO: You come with your
	97	99
1	A No. 1	1 objections in there.
2	Q What exactly did you give him as a reason for not?	2 Q But nevertheless, when you had lunch with her and
3	A I didn't have to give him a reason. I told him I	3 you talked over the phone, she knew you were the
4	wasn't going to do it. I gave him one reason, and	4 chief of police?
5	that was that I said to Marilyn that I would not	Ib A Voc
6		5 A Yes.
7	call her again. That if she wanted to talk to me,	6 Q And needless to say
1 -	she could call me and I would be more than happy to	6 Q And needless to say 7 A Well, I have to assume that she knew. I can't speak
8	she could call me and I would be more than happy to talk with her. But I wasn't going to call her	6 Q And needless to say 7 A Well, I have to assume that she knew. I can't speak 8 for Marilyn.
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1	Α	Well, she told me the whole story she wanted to tell	1		transfers and appointments and assignments within
2		me.	2		~ -
3	0		2	٨	the police force?
		Right.	3		No.
4	A	So, you know, I don't know in any conversation where	4	Q	With respect to the conversations that you had with
5		somebody tells somebody the whole story, but she	5		Ms. Figueroa both on the phone and then through the
6	_	told me what she wanted me to know.	6		lunch meeting, did you make any notes, Chief, of
7		All right. Go ahead.	7		those conversations?
8	Α	No, I was going to say so therefore that was the	8		No.
9		whole story. That's what she wanted to tell me.	9	Q	Did you provide a written report to Mayor Norquist
10	Q	Did you ever ask Marilyn Figueroa strike that.	10		at all?
111		Did she ever tell you during any of these	11	Α	No.
12		discussions, did she ever mention anything about	12	Q	When you spoke to Mr. Soika when he called you
13		filing a lawsuit against the City of Milwaukee?	13		regarding the disclosure that he felt Marilyn was
14	Α	No.	14		going to be filing a discrimination lawsuit, did you
15	Q	All right. Did she ever tell you that she wanted	15		make any notes of that telephone conference with
16	,	money from the City of Milwaukee?	16	No.	Mr. Soika?
17	. A	Only in a sense that she wanted a better job which	17	A	No.
18		would have paid her more money. But she never said	18		Mr. Soika testified extensively during his
19		she wanted money from the City of Milwaukee.	19	- ▼ .3	deposition, and he stated under oath that after
20		MR. ARELLANO: We're going to take	20	2002 2002	Marilyn Figueroa attempted to at least inquire about
21	A sec	a two-minute break and I think we'll	21	a data	filing a complaint of discrimination there were
22	and the second	probably -	22		meetings held in order to address what he perceived
23		MR. SCHRIMPF: You have until one I	23		to be a legal problem down the road. Do you recall
24	i en juli Turkir		24		ever participating in any meetings, strategy
25	44.5	(Recess)	25	70 ° 10 	meetings, any legal meetings related to this
	P : 570	101		1.172	103
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A Yes. Q Have you dealt with him, personal time? I'm not from Milwaukee A Fuchs is a very integral part of my life. Q I'm sure he'll be happy to know that. A He represents the Milwaukee Police Association, and the Milwaukee Police Supervisors Association. So when Jest sued by the Milwaukee Police Association, it John Fuchs or his firm that is vary much a part of that. Q Did Mr. Fuchs ever discuss with you made it is a provide any type of report or statement regarding this particular case, Marilyn Figueroa versus the City of Milwaukee and John Norquist? A I believe — now Just believe that this happened, I may have. I may have. Q Now, who did you give the affidavit to? A It would have been the City Attorney's Office. But I'm not saying that I do in these cases. And don't know whether or not 105 I did in this case. MR. ARELLANO: Counsel, I would appreciate it if you notify me that an affidavit pursuant to his case was prepared by Chief Jones and if you believe that the affidavit is a privileged document, that you state so. MR. SCHRIMPF: I will try to find it. If it was never executed, if's probably attorney-client work product. MR. ARELLANO: Representation of the state of the sentence of the state	1	Q Do you know Attorney Fuchs?	1	THE WITNESS: That's fine.
pleasure meeting you. from Milwaukee. A Furchs is a very integral part of my life. Q Im sure he'll be happy to know that. A He represents the Milwaukee Police Supervisors Association, and part of that. Q Did Mr. Furchs ever discuss with you Marilyn Figueroa? A Never. Q No? Okay. Have you asked — have you been asked to provide any type of report or statement regarding this particular case, Marilyn Figueroa versus the City of Milwaukee and John Norquist? A Never. Q Now, who did you give the affidavit to? I may have given an affidavit. I don't recall, but I may have given an affidavit. I don't recall, but I may have. Q Now, who did you give the affidavit to? A I twould have been the City Attorney's Office. But P mot saying that I did in this case. MR. ARELLANO. Counsel, I would appreciate it if you notify me that an affidavit pursuant to this case was prepared hy Chief Jones and if you believe that the affidavit will appreciate it if you notify me that an affidavit pursuant to this case was prepared, I will try to find it. If it was never done. And then we'll let the judge decide the rest of the story. MR. ARELLANO. Right. I just want to know whether or not othere was one ever done. And then we'll let the judge decide the rest of the story. MR. ARELLANO. Right. I just want to know whether or not there was one ever done. And then we'll let the judge decide the rest of the story. MR. ARELLANO. Right. I just want to know whether or not othere was one ever done. And then we'll let the judge decide the rest of the story. MR. ARELLANO. Right. I just want to know whether or not othere was one ever done. And then we'll let the judge decide the rest of the story. MR. ARELLANO. Right. I just want to know whether or not there was one ever done. And then we'll let the judge decide the rest of the story. MR. ARELLANO. Right. I just want to know whether or not o	2	? A Yes.	1 2	
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6 Q I'm sure he'll be happy to know that. 7 A He represents the Milwaukee Police Association and the Milwaukee Police Association, so when I get sued by the Milwaukee Police Association, in is John Fuchs or his firm that is very much a part of that. 12 Q Did Mr. Fuchs ever discuss with you 13 Marilyn Figueroa 14 A Never. 15 Q No? Okay. Have you asked — have you been asked to provide any type of report or statement regarding this particular case, Marilyn Figueroa versus the City of Milwaukee and John Norquist? 16 City of Milwaukee and John Norquist? 18 A believe — now I just believe that this happened, I may have. 22 Q Now, who did you give the affidavit to? 23 A It would have been the City Attorney's Office. But I'm not saying that I did. I'm just saying that I do'in these cases. And I don't know whether or not 105 1 I did in this case. 2 MR. ARELLANO: Counsel, I would appreciate it if you notify me that an alfidavit pursuant to Judge Lawent's direction that we try to work things out. I would appreciate it if you notify me that an alfidavit pursuant to this case was prepared by C hief Jones and if you believe that the alfidavit is a privileged document, that you state so. 3 MR. SCHRIMPE: I will try to find — if there was such a thing prepared, I will try to find i. If it was never case, case, discovered, it's probably attorney-client work product. 4 MR ARELLANO: Right. I just want to know whether or not there was one ever done. And then we'll let the judge decide the rest of the story. 5 MR ARELLANO: Right. I just want to know whether or not there was one ever done. And then we'll let the judge decide the rest of the story. 6 Chief, I think thal's all we have for today. If we in the course of continuing our discovery in this case, we discover that we need to talk to you again, we will try to work with your calendar. 7 THE WITNESS: Okay.	5		15	
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