

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

MARILYN FIGUEROA,

Complainant,

-vs-

CITY OF MILWAUKEE,

Respondent.

ERD Case No.
CR200003454

Videotape Deposition of:

JOHN O. NORQUIST

(Volume I)

Milwaukee, Wisconsin
March 5, 2002

Reporter: Taunia Northouse, RDR, CRR

VIDEOTAPE DEPOSITION OF JOHN O. NORQUIST.

called as a witness, taken at the instance of the Complainant, under the provisions of Chapter 885 of the Wisconsin Statutes, pursuant to notice and subpoena duces tecum, before Taunia Northouse, a Registered Diplomate Reporter and Notary Public in and for the State of Wisconsin, at the offices of Murphy, Gillick, Wicht & Prachthauser, Attorneys at Law, 330 East Kilbourn Avenue, City of Milwaukee, County of Milwaukee, and State of Wisconsin, on the 31st day of January 2002, commencing at 8:43 in the forenoon.

A P P E A R A N C E S

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

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

Also present: Marilyn Figueroa, Cheri Garcia, Barbara Teipner Wargolet and Emily Aurit (videographer)

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I N D E X

WITNESS

JOHN O. NORQUIST

Examination by Mr. Arellano

Page(s)

4

E X H I B I T S

No. Description

Identified

1 Amended Notice of Taking Deposition
Duces Tecum and Subpoena Duces Tecum

15

2 Complainant's Supplemental Request
for Production of Documents Subpoena
Duces Tecum

16

3 Diagram of floor plan of house

75

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

REQUESTS

PAGE

1 Bracelet receipt

18

(Original transcript filed with Attorney Arellano)

2

MAYOR JOHN O. NORQUIST,

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

(Exhibit Nos. 1 and 2 marked for
identification)

MR. ARELLANO: Before we commence,
let me ask you, Mr. Tokus, are you the one who
is going to be handling this deposition?

MR. TOKUS: Yes, sir.

MR. ARELLANO: Okay, very good.

EXAMINATION

By Mr. Arellano:

Q Having said that, good morning, sir. My name is
Victor Arellano, as you heard. I represent
Marilyn Figueroa. I will be asking you questions
this morning and until we complete your deposition
which is scheduled for today and tomorrow for now.

Have you ever given testimony under oath
before?

A Yes.

Q Okay. Approximately how many times?

A Oh, I don't -- four or five.

Q Have you ever been named a party to any lawsuit, and

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1 I am talking as a defendant or respondent, before
 2 today?
 3 A Only in the course of my duties as Mayor or in the
 4 legislature as a member of JCR which is the employee
 5 relations board that the legislative members set up.
 6 I've had my name mentioned in suits, but I haven't
 7 been personally sued.
 8 Q So you have not been named in any lawsuit where you
 9 are personally the defendant?
 10 A The primary person, primary person involved.
 11 Q So the answer would be no, you have not?
 12 A No, the answer is no, yes.
 13 Q Okay, thank you. Have you reviewed any deposition,
 14 videos or read any instructions with respect to how
 15 depositions are conducted?
 16 A No.
 17 Q Based on the previous deposition testimony that you
 18 have given, I imagine you have a fairly clear idea
 19 as to what a deposition is all about?
 20 A I have a clear idea of what the depositions were
 21 about that I was in before.
 22 Q All right. Well, let me just introduce you to this
 23 deposition. I will be asking you questions and from
 24 time to time your attorney may object for the
 25 purposes of protecting the record. I still would

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1 clarification, that is perfectly fine. Otherwise
 2 this is our opportunity to ask you questions
 3 pertaining to this particular case. If for some
 4 reason you need to take a break because you need to
 5 go to the bathroom or take medication, please let me
 6 know. I certainly don't agree with taking a break
 7 for purposes of finding a way to answer my questions
 8 unless you're about to disclose or I am asking you
 9 to disclose things that are privileged or that you
 10 may have problems involving other individuals in
 11 these proceedings. Is that fair?
 12 A Yes.
 13 Q And the last thing that I wanted to mention is that
 14 you've got to make sure, and I will make sure, that
 15 you answer in a verbal fashion as opposed to nodding
 16 of the head or making sounds uh-huh because
 17 eventually the professional reporter may admonish me
 18 or admonish you into making sure that everything is
 19 verbally answered.
 20 A Yes.
 21 Q Okay? Are you under any type of medication right
 22 now that may, or any type of matter that could
 23 affect your ability to remember, Mayor?
 24 A No.
 25 Q How old are you?

7

1 want you to answer my question unless for some legal
 2 reason your attorney directs you not to answer my
 3 question. Obviously those questions that become in
 4 dispute will be resolved by the judge in these
 5 proceedings.
 6 We have had a fairly orderly and respectful
 7 discovery process to date. We hope to continue in
 8 that fashion.
 9 You probably notice that I have a slight
 10 accent. And if for some reason you don't understand
 11 my question, feel free to let me know. You are not
 12 going to hurt my feelings.
 13 A All right.
 14 Q I want to make sure, Mr. Norquist, that you
 15 understand my question and that you're given a full
 16 opportunity to answer my question. Okay?
 17 A Okay.
 18 Q There will be times when witnesses from time to time
 19 wander in too many other areas that are not
 20 responsive to the question. If that occurs, I will
 21 ask you to come back, listen to my question and
 22 answer my question only; is that okay?
 23 A That sounds reasonable.
 24 Q If for some reason at the end of your deposition
 25 counsel wants to ask you questions for

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1 A 52.
 2 Q What's your date of birth?
 3 A October 22, 1949.
 4 Q And why don't you state for the record your full
 5 name and address, please.
 6 A John Olaf Norquist, 1030 South 26th, Milwaukee,
 7 Wisconsin 53204.
 8 Q And how long have you resided at this particular
 9 address, sir?
 10 A Since 1989.
 11 Q Now, would it be fine if I address you as
 12 Mr. Norquist?
 13 A That's fine. Whatever you prefer.
 14 Q Well, I want to make sure that I don't offend you,
 15 all right?
 16 A I'll tell you if you do.
 17 Q All right. I'm sure you would. I will try not to.
 18 All right. And as I understand, you are the Mayor
 19 of the City of Milwaukee?
 20 A Correct.
 21 Q And for how long have you been acting as the Mayor
 22 for the City of Milwaukee?
 23 A Since April 18th, 1988.
 24 Q And as I understand, you have served as the Mayor
 25 consecutively to date?

8

1 A Correct.
 2 Q Is that correct? And what's your marital status,
 3 Mr. Norquist?
 4 A I'm married to Susan Mudd.
 5 Q When did you marry to Ms. Mudd?
 6 A December 20th, 1986.
 7 Q And have you ever filed for marital separation,
 8 divorce from Ms. Mudd?
 9 A No.
 10 Q Have you ever been married before?
 11 A No.
 12 Q All right. Have you ever physically separated from
 13 your spouse since you got married?
 14 A No.
 15 Q Can you just briefly tell me, Mayor, what's your
 16 academic education?
 17 A I have a bachelor's degree from the University of
 18 Wisconsin-Madison in political science, and I have a
 19 master's degree from the University of
 20 Wisconsin-Madison in public administration.
 21 Q Anything else?
 22 A No.
 23 Q And from my recollection from your years in Madison,
 24 Wisconsin, which is what I have resided most of my
 25 years, as I understand you have been a public

9

1 servant most of your professional career?
 2 A Correct.
 3 Q Is that correct? Was there a time when you did not
 4 work for government?
 5 A Yes.
 6 Q When was that?
 7 A From the end of the time that I graduated for my
 8 bachelor's degree in 1971, I worked variously at
 9 Neighborhood House, Milwaukee as a youth counselor.
 10 I worked for MPS recreation division. I worked for
 11 Milwaukee Electric Tool Corporation for two years as
 12 a machine operator. And I spent six months on
 13 active duty in the United States Army Reserve and
 14 served six years in the United States Army Reserve.
 15 Q Where were you stationed when you were serving in
 16 the military?
 17 A Fort Polk, Louisiana for three months and then Fort
 18 Sam Houston, San Antonio, Texas.
 19 Q Now, you mentioned that you have testified in at
 20 least four to five cases; is that what you
 21 testified?
 22 A Yeah, I would think so. All of them have been in my
 23 capacity as Mayor, and you could get a list of that
 24 from the City Attorney if you wanted it in more
 25 detail.

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1 Q Did any of these cases involve discrimination
 2 claims?
 3 A I'm not sure whether they did. You could, I mean I
 4 can name some cases that possibly did that were
 5 settled. Bill Kerry, who didn't work in my office
 6 but worked in inter-governmental relations, he was
 7 terminated at the end of the Maier administration,
 8 and he filed a lawsuit, and I don't know if one of
 9 his claims was age discrimination or not. He was
 10 60, 61 years old. Tom Hayes who's here today
 11 handled that case. You could ask him the details of
 12 it.
 13 Other than that, there were some other claims
 14 that people have made who were suing the City but
 15 would name me in the lawsuit.
 16 The depositions I had, I had one with the
 17 Bridget Bannon case. Bridget Bannon was somebody
 18 who worked for Henry Maier. She was in an
 19 unclassified position. Shortly after Maier left and
 20 I assumed office she was not reappointed or was
 21 terminated and filed a lawsuit, but eventually it
 22 resolved against her. That was the end of that.
 23 Q When you provided testimony in these lawsuits, I
 24 suspect you were providing testimony under oath?
 25 A In a deposition, correct.

11

1 Q Right. You understand you're under oath today?
 2 A Correct.
 3 Q Are you familiar with Mr. Pedro Colon,
 4 Attorney Colon?
 5 A Yes.
 6 Q Are you aware that at some point your attorney,
 7 Anne Shindell, referred Mr. Colon to the district
 8 attorney with the idea of pressing criminal charges
 9 against him?
 10 A I'm not sure I agree with the entire sentence there,
 11 but the first part of it I would agree with.
 12 Q Well, let's break it down. You're aware of the fact
 13 that Attorney Pedro Colon was referred to the
 14 District Attorney's Office while he acted as the
 15 legal representative of Marilyn Figueroa --
 16 A Yes.
 17 Q -- in this particular case; is that correct?
 18 A Yes.
 19 Q Did you have any input of any kind with respect to
 20 referring Mr. Pedro Colon to the District Attorney's
 21 Office?
 22 A The attorney -- this would have happened during
 23 attorney-client privilege. I think I'd like to --
 24 MR. PINES: I'm going to object and
 25 direct the witness not to answer the question.

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1 Q Did you approve of the referral of Mr. Pedro Colon
2 to the District Attorney's Office?
3 MR. PINES: Same objection, same
4 direction to the witness.
5 MR. ARELLANO: Well, let me see if
6 I understand, Mr. Pines. Are you telling him
7 not to answer a question related to him
8 himself?
9 MR. PINES: You're asking -- I'm
10 not going to get into it and direct him not to
11 answer. That's my objection. It's
12 privileged.
13 Q Did you believe that Mr. Pedro Colon should have
14 been referred to the District Attorney's Office?
15 A I really, I really don't have an expertise in that
16 area of the law.
17 Q Well, that wasn't my question. My question is --
18 A Let me try to answer it then.
19 Q Did you agree, did you believe that he should have
20 been referred to the District Attorney's Office?
21 A I'm not sure.
22 Q Did you in any way object to having Mr. Pedro Colon
23 referred to the District Attorney's Office?
24 MR. PINES: Object, calls for
25 attorney-client privileged communications.

13

1 representing Marilyn Figueroa?
2 A Oh, I would say --
3 MR. PINES: I'm going to object on
4 privilege grounds, direct the witness not to
5 answer.
6 Q Did you ever read in the newspaper that
7 Mr. Pedro Colon was referred to the District
8 Attorney's Office?
9 A Eventually, yeah.
10 Q When did that happen?
11 A I don't know. Whenever it was in the newspaper.
12 Q All right. Do you believe that Mr. Colon should
13 have been prosecuted for anything that he did while
14 he represented Marilyn Figueroa against the City of
15 Milwaukee and/or against you?
16 A I'm not sure.
17 Q Why aren't you sure?
18 A Well, I'm not an expert in that area of the law.
19 Q Before coming here today, sir, did you review any
20 records?
21 A Any records of what?
22 Q Related to this case.
23 A No.
24 Q Let me show you, Mr. Norquist, what has been marked
25 as Exhibit No. 1. Let me give you an opportunity to

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1 I'm going to direct the witness not to answer.
2 Q Well, I'm not asking you to disclose anything with
3 respect to communications with your former attorney,
4 Anne Shindell. I'm asking you whether or not --
5 MR. ARELLANO: Can you read my
6 question back, Ms. Reporter?
7 (Question read)
8 Q Go ahead, sir.
9 MR. PINES: To the extent that the
10 question asks whether or not the witness
11 communicated to his attorney, I object on
12 attorney-client privilege grounds and direct
13 the witness not to answer.
14 Q Did you believe Mr. Pedro Colon had engaged in an
15 improper conduct enough to refer him to the District
16 Attorney's Office?
17 A I'm not sure.
18 Q Did you ever investigate whether or not --
19 A No.
20 Q -- Mr. Colon did anything wrong?
21 A No.
22 Q How long have you known Mr. Pedro Colon, Mayor?
23 A Oh, since I'd say spring of 1998.
24 Q All right. To your knowledge, when did you first
25 become aware of the fact that Mr. Colon was

14

1 go over that document and tell me if you are
2 familiar with that Exhibit No. 1.
3 A No.
4 Q Never seen it before?
5 A Well, if I have, I don't remember.
6 Q So if you don't remember this document, let me ask
7 if you have seen Exhibit No. 2.
8 MR. PINES: Can I see it, please?
9 (Document handed to Attorney Pines)
10 Q Let me now show you Exhibit No. 2, Mr. Norquist.
11 MR. ARELLANO: While he reviews
12 that record, let the record reflect that
13 Attorney John Carlson, Jr. representing the
14 complainant as well is also present.
15 A Maybe you could describe what you think is --
16 Q I just want to know if you have seen this document
17 before.
18 A I haven't. I haven't.
19 Q You have not?
20 A Not that I know of.
21 Q Okay. Let me take a look at this document. Going
22 back to Exhibit No. 1 of your deposition, this
23 constitutes a notice of deposition and a subpoena
24 duces tecum which requires you to produce certain
25 records. Some of those records are outlined on item

16

1 No. 7. Let me ask you to read that record out loud.
 2 Then I will ask you a question.
 3 A No. 7, provide any and all related records,
 4 telephone notes, credit card statements, memoranda,
 5 memorandum, personal notes, special cards, letters
 6 of any nature, and gifts related to in any manner to
 7 your alleged consensual or nonconsensual
 8 relationship with Marilyn Figueroa.
 9 Q Did you understand the question, at least the
 10 paragraph that you just read, Mr. Norquist?
 11 A I understand what I read, yeah.
 12 Q Do you have any records as identified in paragraph
 13 No. 7 of Exhibit No. 1 in your possession?
 14 A Not today, no.
 15 Q Do you have any records anywhere?
 16 A I might have a receipt of a bracelet that I bought
 17 for her.
 18 Q For Ms. Figueroa?
 19 A Correct.
 20 Q Anything else that would respond to paragraph No. 7
 21 of your notice of deposition?
 22 A I don't think so.
 23 Q You read it carefully and you understood that
 24 paragraph?
 25 A Yes.

17

1 MR. ARELLANO: Just so the judge
 2 understands my motion, all records were to be
 3 provided three days before today's deposition.
 4 And if that is the only record obviously that
 5 the Mayor believes he has, we are certainly
 6 requiring that that record be produced by
 7 tomorrow.

8 MR. TOKUS: You're expressing that,
 9 you're acknowledging that the records
 10 responsive to this subpoena duces tecum have
 11 already been provided to you. Are you
 12 acknowledging that?

13 MR. ARELLANO: No, I'm not. I'm
 14 acknowledging that certain records have been
 15 provided but that none of them have been
 16 identified as pertaining to the order issued
 17 by Judge Lawent regarding Mayor Norquist. But
 18 I'm not going to argue that issue.

19 MR. TOKUS: I should hope not.

20 MR. ARELLANO: Yes. And I'm not
 21 going to argue with you neither.
 22 Q Are you able to produce that receipt by tomorrow,
 23 sir?

24 A I think I should be able to.

25 Q And the receipt pertains to a bracelet that you

19

1 Q And the only thing that you believe you have in
 2 response to that paragraph would be a receipt for a
 3 bracelet?
 4 A Correct.
 5 Q Is that correct?
 6 A There may be something else I'm not thinking of, but
 7 that's what I can think of.
 8 Q And where is that receipt today?
 9 A Well, I know I can find it, so I'll try to get it to
 10 you right away.
 11 Q Here's -- to save you quite a bit of time, other
 12 than that receipt, do you have any other records,
 13 including what has been asked in paragraph No. 7 of
 14 your notice of deposition, do you have any other
 15 records in your possession related to this
 16 particular request 7 or request made in
 17 Exhibit No. 2 that you have in your possession?
 18 A No.

19 MR. ARELLANO: All right. Let me
 20 just interject here and ask counsel why that
 21 receipt has not been produced today before I
 22 file a motion to compel with other required
 23 documents.

24 MR. TOKUS: The receipt will be
 25 provided for you, Mr. Arellano.

18

1 purchased --
 2 A Right.
 3 Q -- for Marilyn Figueroa?
 4 A Correct.
 5 Q When did you purchase that bracelet?
 6 A I think it was on November 29th, but the receipt
 7 should have the date on it.
 8 Q Should have that date. When did you actually
 9 deliver the bracelet?
 10 A I think I did on November 29th.
 11 Q Do you have any records or notes that would reflect
 12 whether or not you did issue that bracelet --
 13 A It was 1999.
 14 Q All right.
 15 A No, I don't.
 16 Q You don't, okay. Very good. The bracelet that you
 17 gave Marilyn Figueroa, where did you actually give
 18 the bracelet to Ms. Figueroa?
 19 A At her house.
 20 Q And do you recall the date when that occurred?
 21 A I think it was November 29th. I'm not absolutely
 22 sure. It could have been, the other date that I
 23 thought it might be would be December 2nd.
 24 Q And do you recall the time when that occurred?
 25 A Late morning.

20

Case Compress

1 Q Before lunch or after lunch?
 2 A Before lunch.
 3 Q And that would have been at her home?
 4 A Correct.
 5 Q Was that during a weekday or during a weekend?
 6 A Weekday, weekday.
 7 Q Okay, very good. Was anyone at her house when you
 8 issued that bracelet?
 9 A No.
 10 Q All right.
 11 A Not that I know of.
 12 Q Did you call before you got to her home?
 13 A She picked me up at my home.
 14 Q Where were you residing at that time?
 15 A 1030 South 26th.
 16 Q And that is the only receipt that you believe you
 17 have, just so I can leave that alone?
 18 A Yes.
 19 Q Have you discussed any of the testimony that has
 20 been taken in this case thus far --
 21 A No.
 22 Q -- with anyone?
 23 A Only what I've read in the paper.
 24 Q What exactly did you read in the paper?
 25 A The comments after a phone call, a conference call

21

1 Q And so that would have been in what year?
 2 A 1994.
 3 Q And when do you believe that this alleged consensual
 4 relationship ended?
 5 A December 2nd, 1999.
 6 Q And when was the last time that there was sexual
 7 intercourse between you and Marilyn Figueroa?
 8 A Either, either on the 29th or the 2nd. I think it
 9 was the 29th, but it could have been the 2nd.
 10 Q Actual fornication?
 11 A Correct.
 12 Q Is that correct?
 13 MR. PINES: That calls for a legal
 14 conclusion. The definition of fornication
 15 involves sexual intercourse or contact --
 16 sexual intercourse in public.
 17 A It wasn't in public.
 18 Q But there was actual intercourse?
 19 A At her house, correct.
 20 Q Is that your claim?
 21 A Yes.
 22 Q And when was the last time that you had any direct
 23 contact with respect to this relationship? I'm
 24 talking about the consensual relationship with
 25 Marilyn Figueroa. Was that December 2nd, 1999?

23

1 that you all had that Greg Borowski reported.
 2 Q You have claimed that you engaged in a consensual
 3 relationship with Marilyn Figueroa while she was
 4 your subordinate; is that correct?
 5 A I engaged in a consensual relationship with
 6 Marilyn Figueroa.
 7 Q While she was an employee?
 8 A Correct.
 9 Q For the City of Milwaukee?
 10 A Correct.
 11 Q Under your supervision; true?
 12 A Correct.
 13 Q Do you have any witness, any names of any witness
 14 that would corroborate your position that you had a
 15 consensual relationship with Marilyn Figueroa during
 16 that period of time?
 17 A I don't have a witness. It was an affair. It was
 18 something that nobody knew about but us.
 19 Q When do you believe that relationship as you call
 20 it, when do you believe that began?
 21 A It began in early October 1994.
 22 Q And when you say early October, are we talking about
 23 sexual intercourse in October of 1994?
 24 A No. That would have been about three or four weeks
 25 later.

22

1 A I think it was over the phone, a phone call on the
 2 evening of December 2nd. It could have possibly
 3 been the 3rd. It was a conversation where we agreed
 4 it was over, the relationship was over.
 5 Q Do you have any calendars that could help you to
 6 determine exactly the day when the relationship was
 7 ended?
 8 A I think you've been provided the calendars, but I've
 9 looked at them, and I tried to narrow it down as
 10 best I can.
 11 Q And was any calendar helpful to you?
 12 A A little bit, yeah.
 13 Q In what sense?
 14 A Well, times when I had events where, appointments
 15 where I couldn't have been doing anything else.
 16 That helps to narrow it down.
 17 Q So let me see if I understand this. You claim that
 18 you had sexual intercourse with Marilyn Figueroa on
 19 or about December 2nd and it was on or about
 20 December 2nd when the relationship ended?
 21 MR. TOKUS: Objection. I don't
 22 think that fairly characterized the testimony.
 23 A I think that the last time that we were together,
 24 which was at her house, was --
 25 Q Well, hold on a second, sir.

24

1 A' Okay. I'll just answer the question. Ask it again
2 and I'll try to --
3 MR. ARELLANO: Let me ask you to
4 read the question subject to counsel's
5 objection.

6 (Question read)

7 A I would say that I'm not absolutely sure when the
8 last encounter was, whether it was the 29th or the
9 2nd. I'm fairly sure it was one or the other. And
10 the phone call that, to me at least seemed like the
11 end of the relationship was, it could have been the
12 3rd, but it could have been the 2nd. And that was
13 the end of the relationship.

14 Q So let me see if I understand this. You first had
15 sexual intercourse, and then immediately after that
16 the relationship ended via telephone call?

17 A No. I would say if the last time we were together
18 was on the 2nd, then the phone call was probably a
19 day or two later.

20 Q Did the relationship in your view end on a friendly
21 note via telephone?

22 A Well, I don't know if I would characterize it as
23 friendly, but it ended.

24 Q Well --

25 A It wasn't, it wasn't angry. It was just that mutual
25

1 and I visited her briefly at St. Luke's Hospital and
2 wished her a speedy recovery. Her brother was
3 there. I don't remember which brother but -- and
4 then the last time I saw her was, she was on the way
5 out of the City Hall on January 4th about noon. I
6 was on my way into City Hall. I said hi, how is it
7 going? She said something like okay or, you know,
8 it wasn't enthusiastic things are great, but that
9 was it. That was the last time I saw her except for
10 today as far as I know.

11 Q After December 2nd did you ever visit her home after
12 that?

13 A No.

14 Q During this period of --

15 A Not to my -- I mean as I've said, you know, the
16 dates, I think it was November 29th or December 2nd.
17 It could have been, you know, the 3rd or the 4th or
18 something like that. It definitely was not after
19 December 10th because when we did the Channel 46,
20 that was the end. I mean the relationship was over
21 at that point.

22 Q During the time that you had this alleged consensual
23 relationship with Ms. Figueroa did your wife know
24 about this relationship?

25 A No.

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1 decision to end it.

2 Q And then after that did you ever have any other
3 direct contact with Marilyn Figueroa after --

4 A Direct contact meaning what?

5 Q Any conversation, direct contact with
6 Marilyn Figueroa.

7 A On the December 10th she accompanied me to the,
8 along to Channel 46 which is located in West Allis,
9 had staffed me for an appearance on a Hispanic
10 program, and that was basically just in the line of
11 work because she communicated ideas for things that
12 she thought it would be good to say on the program,
13 and I used some of them.

14 Q Was there any contact, physical contact between the
15 two of you?

16 A No.

17 Q How long did this meeting last with Channel 26?

18 A The show itself took about a half hour to tape, so
19 probably five minutes before and five minutes after.

20 Q Was she friendly to you at that time?

21 A I thought she was professional, just doing her job.
22 I wouldn't say it was friendly, but it wasn't
23 unfriendly.

24 Q Then after that was there any further contact?

25 A She had a car accident sometime late December 16th,
26

1 Q

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10 Q

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12 A

13 Q

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16 A

17 Q

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19 A

20 Q

21

22

23 A

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Case Compress

1
2 Q
3
4 A
5 Q
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7
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9 A
10
11 Q
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13 A
14 Q
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16 A
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20 Q
21
22
23 A
24 Q
25

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1 A
2 Q
3 A
4 Q
5
6 A
7
8
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10
11
12 Q
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14
15
16 A
17 Q
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19
20 A
21 Q
22
23 A
24 Q
25 A

MR. PINES: Objection, objection
and move to strike the answer. I'm directing
the witness not to answer the question.

MR. ARELLANO: The answer will
stand as stated. All right.

Q So let me just simply put this to rest. You don't
have any records which you believe relate to this
case other than the receipt that you identified
earlier?

A That I know of.

Q You don't have any calendars that could help us to
determine specifically dates you met with
Marilyn Figueroa?

A Only the calendars you've already been provided.

Q Is there anything in those calendars that can help
us to determine when you met with Marilyn Figueroa?

A Well, I mean calendars can help narrow down --

Q Certain things?

A -- when things are possible.

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1 Q We'll go into that. Now let's talk a little bit
2 about the office of the Mayor. As I understand your
3 relationship began sometime, as you claim, in 1994
4 and ended sometime in late 1999, December or so; is
5 that correct?
6 A Late November, early December.
7 Q All right. And again, you're not exactly sure as to
8 the beginning and the ending dates, but you assume
9 that it was somewhere between December 2nd and
10 December 3rd; is that correct?
11 A Correct.
12 Q Now, before that was Marilyn Figueroa an employee of
13 the City of Milwaukee?
14 A You mean before she became an employee of the
15 Mayor's office?
16 Q No, before you began to have sexual acts with
17 Marilyn Figueroa.
18 A Yes. She was already an employee.
19 Q How long had she been working for the City of
20 Milwaukee before you began to have sexual acts with
21 Marilyn Figueroa?
22 A Well, she began work probably at the beginning of --
23 I think you have that date, but it would be the
24 beginning of May or the end of April 1992, and the
25 relationship began in October of 1994.

32

Case Compress

1 Q So she had been working there for at least two
2 years; correct?
3 A Correct.
4 Q Did you know Marilyn Figueroa before she became an
5 employee for the City of Milwaukee?
6 A Not very well. I think I'd seen her at a couple of
7 places.
8 Q I suspect that you are the person with the final
9 appointing authority of staff assistants to the
10 Mayor?
11 A Yes.
12 Q And as I understand, you would have the authority to
13 fire and/or hire -- high and/or fire staff
14 assistants as well?
15 A Correct.
16 Q And as I understand, you also have the authority to
17 promote and/or demote or recommend promotions as
18 well?
19 A Well, subject to rules of reclassification and other
20 things that the Council has to approve.
21 Q Right. You are the person responsible for the
22 recommendation before the final approval by the
23 Council takes place?
24 A For positions that are under the authority of the
25 Mayor, yes.

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1 the Mayor?
2 A Yes.
3 Q Is that correct? And as I understand, they all work
4 on different tasks assigned by you and your chief of
5 staff; is that correct?
6 A Repeat that question.
7 MR. ARELLANO: Do you want to read
8 that back.
9 A I'm not sure of that.
10 (Question read)
11 A Correct.
12 Q And I suspect you also supervise or at least have
13 final appointing authority -- strike that -- final
14 authority as to with respect to vacation, sick leave
15 and things of that nature for the assistants to the
16 Mayor?
17 A Ultimately. I don't pay particular attention to
18 those kinds of details. I have no idea what
19 people's vacation times or sick leaves are. And
20 I've never made a practice of paying attention to
21 any of it.
22 Q When you --
23 A I have other duties that I consider more important
24 than that.
25 Q I'm sure. When you began what you believe was a

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1 Q And I suspect you also have the authority as the
2 Mayor of Milwaukee, the authority to approve and/or
3 deny pay increases within your staff; is that
4 correct?
5 A I do. I didn't -- I've never taken a particularly
6 active role in that. It's not, it's sort of a
7 detail that I don't usually get involved in that
8 much.
9 Q All right. You also have the authority to recommend
10 reclassification as well?
11 A I could. I normally am not involved in that. I
12 don't know that I've ever -- I don't even know where
13 you'd file the form for a reclassification.
14 Q But do you get to see reclassification
15 recommendations before they are processed and
16 finalized?
17 A Well, I probably sign them. I mean I'd have to
18 check. I sign lots of documents every day that are
19 boilerplate. But I've never actively been
20 particularly interested one way or the other in
21 reclassifications. Usually an employee wants a
22 reclassification, but it generates from them, not
23 from my side.
24 Q And as I understand, you basically supervise along
25 with your chief of staff all the staff assistants to

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1 consensual relationship, which according to you
2 started sometime in October of 1994 through
3 December 2nd, 1999; is that correct?
4 A Yeah. The December 2nd date I'm not completely sure
5 about. The October, you know, I don't know the
6 exact date it started, but I believe it started
7 sometime in the first part of October.
8 Q But it ended sometime in December; is that correct?
9 A In December.
10 Q Correct?
11 A Yes.
12 Q Of 1999; true?
13 A I would say early December.
14 Q Are you able to tell me, Mayor, how many times in
15 that period of time, how many times you engaged in
16 sexual intercourse with Marilyn Figueroa?
17 A I would say 10 to 12 times.
18 Q And are you able to tell me where these 10 to
19 12 times, and I'm talking about when you had sexual
20 intercourse, are you able to tell me where those
21 12 times, 10 or 12 times occurred?
22 A Yes.
23 Q Okay. Go ahead and tell me.
24 A At, the first time was at my house late in
25 October of '94 or early in November of '94. I'm not

36

sure I'll have the order right.

Q The second time?

A The second time would have been at her house on South 19th Street between Mineral and National Avenue.

Q Third time?

A Probably, that was probably in the summer or fall, I would say probably in October of 1995. So there was quite a bit of time passed between those two times.

Q The third time?

A She was moving from South 19th to, I think she moved to a street called Fardale south of Loomis Road. Between that time I believe she lived with her sister and we got together once and had intercourse at her sister's, older sister's house which is a block south of the house that I lived in. And then we had intercourse twice at her house in Fardale.

Q What year?

A I'm not sure about the year, but that would have probably been '96. You know, you could check when she lived there. It would have been sometime during that period.

Q 1996 was when you claim sex occurred at her sister's house?

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1 remember the name of the hotel but --

2 Q You mentioned Pine Street.

3 A Palmer House Hotel in Chicago. And I think that's

4 pretty well it.

5 Q Pine Street, what year are we talking about?

6 A Whenever she lived there. It would have been two

7 times there.

8 Q What years?

9 A '9 -- probably '99.

10 Q And those two times occurred what months? The one

11 in 1999.

12 A One would have been the last time.

13 Q December or November?

14 A The end of November, beginning of December. The

15 other time would have been earlier that year, maybe

16 in the summer, the spring. There were quite a

17 distance of time between them.

18 Q And in 1999 did there come a time when sexual

19 intercourse occurred at your place of residence?

20 A Yes. There was one more time at my place of

21 residence.

22 Q Was that in October?

23 A I'd say, yes, October 16th.

24 Q So there was another time in November I believe did

25 you say?

39

A Well, I mean we'd have to -- I'm not completely sure on the dates but --

Q Okay. Just give me a rough.

A I think that sex occurred at her sister's house between the time when she lived on South 19th and Fardale.

Q What year was that?

A I'm, I know she was still at South 19th in October of '95 when we had intercourse at her house there.

Q And what about --

A So it would have been after that.

Q So it would have been 1996?

A Probably.

Q And then at her house you believe in 1996 again?

A Yeah, at Fardale.

Q So we're in the fifth time.

A There were two times it happened on the weekend in my office. And that would have probably been in '96.

Q And next time? If there was one.

A It would have been sometime at her house on Pine, I think two times there. That's all I --

Q What year?

A Oh, and then also in 1997 at the hotel. I can't

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1 A At her house, the one we've already described.

2 Q At her house, okay. And there was you believe a

3 third encounter in December?

4 A No, no. There was a time at the beginning, either

5 the end of November, the beginning of December.

6 Q So there was one in October, one in November that

7 could have fell in late November or early December;

8 is that correct?

9 A Early December, correct.

10 Q And then you had another meeting with Ms. Figueroa

11 sometime in mid December to attend a social function

12 or TV function?

13 A Correct.

14 Q With Channel 26?

15 A Correct.

16 Q And that would have happened sometime in mid

17 December?

18 A Correct. It would have happened on December 10th.

19 Q And any other contact --

20 A It did happen on December 10th. And that was just a

21 professional, I mean doing our respective jobs.

22 Q When you went to that Channel 26 function --

23 A 46.

24 Q 46, excuse me. You traveled together; correct?

25 A I'm not sure we did. I'm not -- I don't remember.

40

1 Q Well, did you go to her house first?
 2 A No.
 3 Q Did she meet you at your house in December?
 4 A I don't believe so. Not on that date.
 5 Q Well, do you know how you met, where you met?
 6 A At the television station.
 7 Q Okay, very good. All right. Have you told me all
 8 of the times which led to sexual intercourse with
 9 Marilyn Figueroa?
 10 A As far as I can remember. There may have been one
 11 or two others.
 12 Q Now let's talk about were there times when there was
 13 sexual contact which did not include sexual
 14 intercourse?
 15 A Yes.
 16 Q Let's talk about how many times.
 17 A I really don't remember the exact number of times.
 18 There were times we got together at her house on
 19 South 19th early in the relationship. We would just
 20 kiss or I would -- she would uncover her breasts and
 21 have me kiss her breasts.
 22 Q Did any type of sexual contact ever occur other than
 23 the intercourse incident, do you recall any other
 24 sexual contact or contact of sexual nature which did
 25 not lead to intercourse which occurred at the

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1 please.
 2 (Question read)
 3 Q During work hours.
 4 A All right. There was three times when apples, where
 5 we had something involving an apple. One time she
 6 brought an apple to me which I believe she may have
 7 rubbed between her legs, and another time she took
 8 an apple from me which she thought that I might
 9 have -- that I had rubbed between my legs. Later on
 10 I told her that I hadn't. She had eaten the apple
 11 in my presence in the office. And it was, she
 12 thought it was funny that, you know, that there had
 13 been that misunderstanding. It was kind of a joke.
 14 The third time, the third time involving the
 15 apple was the time I visited her at the noon hour at
 16 her sister's house and there was an apple on a plate
 17 next to this bench where we had fornication, or
 18 intercourse.
 19 Q The two first incidents --
 20 A And that apple, it was there on the plate. I
 21 ignored it. And we went ahead and had fornication.
 22 And that's -- that's what happened.
 23 Q The first two incidents, did they occur at work, at
 24 the office?
 25 A Yes.

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1
 2 A No.
 3 Q Do you recall any one time when discussions may have
 4 occurred of a sexual nature during telephone
 5 conferences?
 6 A You mean where we talked to each other?
 7 Q Where you talked to her in a sexual fashion, sexual
 8 nature, sexual manner.
 9 A We talked over the phone about our relationship and
 10 sometimes in ways that were of a sexual nature.
 11 Q Did that happen at times when she was at work?
 12 A No.
 13 Q You never called her at work and talked --
 14 A No.
 15 Q -- sexual manner?
 16 A Never.
 17 Q Did you ever request that she use an apple placed
 18 between her legs and bring it to you?
 19 A I never, I never requested that she -- repeat the
 20 question because I want to make sure I answer this
 21 accurately.
 22 Q Do you recall ever having Marilyn Figueroa use
 23 apples or any other object in a sexual manner and
 24 share it with you?

MR. PINES: Can you read that back,

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1 Q And the third incident you believe happened at her
 2 home; true?
 3 A Yeah, well, it was -- I didn't look at it really as
 4 an incident because she had an apple on a plate and
 5 I --
 6 Q But at least you remember it?
 7 A -- thought --
 8 MR. TOKUS: I'm going to object,
 9 Mr. Arellano. I don't believe the testimony
 10 was that it was at her home.
 11 A It was at her sister's house.
 12 Q Subject to that correction. But the fact is that
 13 you remember seeing or using apples in a sexual
 14 manner during your alleged relationship with
 15 Ms. Figueroa; correct?
 16 A Well, I don't know how sexual it was. It was kind
 17 of a joke.
 18 Q Right. And the joke was that you knew she would
 19 place an apple between her legs and she would bring
 20 it to you?
 21 A I don't know that for a fact, but she may well have.
 22 Q And these incidents occurred during working hours?
 23 A Two incidents.
 24 Q Do you recall --
 25 A One in which, one in which she put an apple on my

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desk, and the other one she took an apple off my desk and ate it and thought that I had rubbed it on myself.

Q I understand that that's what you want to tell me. Just listen to my question.

A I will.

Q Do you recall any other time during working hours when there was any type of behavior which included sexual touching of her breasts --

A No.

Q -- at work? Any time when you stood by her desk with an erection visible for her to see?

A No.

Q Ever?

A No.

Q Now, before you began this relationship, is it fair and accurate to say that you knew Marilyn Figueroa was a single mother?

A I don't know that for sure. I think she might have still been married.

Q Was she going through a divorce?

A It's my understanding.

Q Was that, did you know that she was going through --

A I didn't know that she was married or not married at the time.

45

Q At what point did you learn that fact?

A I think early in the relationship that she was separated and I believe in the process of getting a divorce.

Q Did you learn that she had had a rather abusive marriage?

A That's what she said.

Q All right. And then there was a time as I understand when Marilyn was the subject of a sexual street -- sexual attack. Do you recall that?

A She said that she had had a sexual street attack --

Q Do you recall when that --

A -- that she escaped from as I remember.

Q And do you recall when that occurred?

A I would say probably in late summer or September of 1994. I'm not positive about that. I'm sure the incident report would give you the exact date.

Q Before that incident occurred, had you already had intercourse with Marilyn Figueroa?

A No.

Q As a result of that sexual attack she was the subject of, did you send flowers or deliver flowers to Marilyn Figueroa?

A I sent flowers to her.

Q And at that point was she hospitalized as a result

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of that sexual attack?

A I don't know.

Q Did you take any action, as the Mayor of Milwaukee did you take any action to try to find her attacker of that incident?

A Just checked with the police to make sure that they were taken seriously.

Q Do you know how she described --

A Which they were as far as I could determine.

Q Do you know how she described her attacker, white, black, brown?

A Black.

Q Black. Did you ever order that the police stop all the black men in the area to make sure that they would be interrogated --

A No.

Q -- for purposes of investigating this attack?

A No.

Q And then was that the very first time that you had ever given Marilyn flowers?

A Yes.

Q And before that had you in any way dated Marilyn Figueroa?

A No.

Q So at some point -- was that sexual attack a point

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of time when you began to get closer to Marilyn Figueroa as a result of that incident?

A Well, I'm really not sure exactly -- I don't think that was a key factor in us getting close.

Q But it was right after that date that you began to get closer to Marilyn Figueroa; correct?

A I don't know. When was the date? I mean that's one thing we could look up.

Q Well, it is clear that after the attack is when you began your relationship as you put it?

A Yeah, I understand that. But I don't think that that was a major factor one way or the other.

Q At this point I didn't ask you that. I asked you whether or not --

A I felt sympathy for her for what had happened.

Q But it happened after that physical attack that you began your sexual interaction with Marilyn Figueroa?

A It was after that, but I don't know how long after. We can look it up, the date of the incident.

Q I understand, I understand. Obviously before that did you ever date any other staff assistant --

A No.

Q -- in your office? All right. Now, obviously Marilyn Figueroa reported to you at the time she was attacked in the street back in 1994-95; correct?

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1 She reported to you? She was one of your
2 subordinates?
3 A She worked in my office, correct.
4 Q And obviously you knew that you were her supervisor
5 at all times when you engaged in that sexual
6 intercourse with Marilyn Figueroa?
7 A Yes.
8 Q All right. Marilyn Figueroa, was she also required
9 to work in your political campaigns?
10 A She wasn't required to.
11 Q Did she work?
12 A She did in one degree or another.
13 Q Ms. Barb Candy describes Marilyn Figueroa as one of
14 the hardest workers in the political campaign.
15 Would you have any disagreement with that statement?
16 A No. I think she did work hard.
17 Q Do you know how much time she would spend doing
18 political campaign as opposed to working with the
19 City of Milwaukee?
20 A Well, I assume that whatever time she spent on the
21 political campaign was time she took off.
22 Q All right. We'll go into that. At that time, as I
23 understand, when she worked for you before the
24 relationship began, as I understand, it has been
25 your practice to have assistants visit your home and

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1 Q All right. During these sexual intercourses **did** any
2 of them occur while Marilyn Figueroa was **trying** to
3 drop something off or dealing with some work related
4 issue?
5 A No. I would say that if she came by the house, it
6 was not in a work related capacity.
7 Q We'll go into those details in a minute. Now, as I
8 understand, when you, sometime in 1994-95 you knew
9 by virtue of the fact that she was going through a
10 divorce that Marilyn Figueroa was a single parent;
11 correct?
12 MR. TOKUS: Objection. That's not
13 the state of the record, counsel.
14 Q Go ahead, sir.
15 A I'm not sure I knew that or didn't know it.
16 Q Did there come a time when you learned that she was
17 a single parent?
18 A Yeah. I just don't remember when it was. Yes, and
19 I don't remember when it was.
20 Q Did there come a time when you realized that she was
21 the sole bread provider for her two children?
22 A Well, I don't know what kind of support arrangement
23 she had.
24 Q But you knew she was not married when she was
25 working for the City, for you?

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1 work out of your home from time to time; correct?
2 A Not really.
3 Q Have you ever had any other assistant come to your
4 house for work related purposes?
5 A I've had budget meetings sometimes in my backyard
6 when the weather's nice. I've never had meetings in
7 my house with, on any kind of regular basis. I mean
8 occasionally there might have been somebody who came
9 by for something.
10 Q Do you know any one assistant to the Mayor who has
11 not visited your house at one time or another for
12 work related reasons?
13 A Do I know anybody who ever worked for me who didn't
14 come by?
15 Q Anybody, right, right.
16 A I'd say about half.
17 Q What about Mr. Miller? Has he ever visited your
18 house for work related reasons?
19 A I don't know. He might have. I'd be surprised if
20 he had.
21 Q What about Marilyn Figueroa before you began your
22 sexual intercourse affair? Did she ever visit your
23 home?
24 A She might have to drop something off on the way home
25 or something.

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1 A Correct. If somebody's single, at least the money
2 they have themselves they earn themselves.
3 Q You realize that her job in the Mayor's office was
4 the only source of income that she had.
5 A Other than support from her ex-spouse. I suppose.
6 I didn't spend a lot of time analyzing the
7 situation.
8 Q And it was clear to you that Marilyn Figueroa did
9 not have a college degree while she was employed for
10 the City of Milwaukee; true?
11 A Well, I'm not sure. I didn't think about it a lot
12 one way or the other. I now know that and I have
13 probably known that for four or five years.
14 Q To your knowledge, was a college degree required for
15 any of the staff assistant to the Mayor positions?
16 A No. It's not required to be Mayor either.
17 Q Were performance reviews required for staff
18 assistants to the Mayor?
19 A We could do performance reviews. I think, you know,
20 it wasn't something that I paid a lot of attention
21 to. If somebody was effective in what they did, you
22 knew it.
23 Q To your knowledge, was Marilyn Figueroa effective in
24 her job duties?
25 A I think she was effective particularly working as a

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1 Mayor's representative on the block grant committee.
 2 I think she was effective at community organizing.
 3 Q Before she left the City of Milwaukee employment,
 4 did you have any complaints about her performance?
 5 A Well, I mean I'm sure there were some things people
 6 are good at, some things people aren't that good at.
 7 I didn't have any big complaints about it, no.
 8 Q During the months of December did you have any
 9 problems with her performance and/or conduct?
 10 A December what, '99?
 11 Q Of 1999.
 12 A No.
 13 Q After you ended the relationship did you notice any
 14 change in her behavior, her mood, her attitude at
 15 work?
 16 A In terms of her behavior, professional behavior, the
 17 times I interacted with her I thought she acted
 18 professionally. I mean it obviously was a stressful
 19 thing to have a relationship in, but I thought she
 20 handled it okay.
 21 Q Do you recall, Mayor, whether or not in the year
 22 1999 Marilyn Figueroa took substantial sick leave?
 23 A I know that now. I really -- I don't keep track of
 24 the sick leave. It's not a detail that I get into.
 25 Q Do you know when Marilyn was issued a letter of

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1 termination, Mayor?
 2 A No.
 3 Q Do you know when her employment became, when her
 4 termination of employment with the City of Milwaukee
 5 became effective?
 6 A I know she left the office on January 4th, and as
 7 far as I know, never came back.
 8 Q Do you know if she ever provided a medical
 9 authorization to your office?
 10 A As far as I know, she didn't.
 11 Q Do you know if she provided, her attorney provided a
 12 medical authorization to your former counsel,
 13 Anne Shindell?
 14 A I do not.
 15 Q Was a medical authorization required in your view?
 16 A If it was required by the Department of Employee
 17 Relations and any other situation, then it would be
 18 required in that. I'm not an expert on the
 19 procedure of that.
 20 Q Do you believe that one was required after she left
 21 on January 4th of the year 2000?
 22 A I'm not sure I understand that question.
 23 Q Do you know if she was required to produce a medical
 24 authorization sick leave after January 4th, 2000?
 25 MR. TOKUS: Well, I think you're

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1 assuming some facts that are not in evidence
 2 at this point, counsel, so I will object to
 3 the form of the question.
 4 Q Go ahead, sir.
 5 MR. TOKUS: May we have that
 6 question read back, please.
 7 (Question read)
 8 MR. TOKUS: Do you understand the
 9 question?
 10 THE WITNESS: No.
 11 MR. TOKUS: All right.
 12 Q Do you know why Marilyn was separated from
 13 employment with the City of Milwaukee?
 14 A I believe it's because she didn't come back to work
 15 and didn't provide a medical excuse.
 16 Q Was a medical excuse required in your view?
 17 A I'm not sure. I mean you can look it up. It's the
 18 law.
 19 MR. TOKUS: Objection. Hold on.
 20 I've got an objection. I object to the form
 21 of the question.
 22 Q Go ahead, sir.
 23 A I'm not sure exactly what things are required or not
 24 required. If somebody -- I mean common sense would
 25 tell you if somebody doesn't come back to work and

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1 you don't get any kind of excuse to explain why they
 2 haven't come back to work, that eventually the
 3 employment ends. How that happens, the details of
 4 it, the forms that are filled out and all that,
 5 that's something that's beyond my scope.
 6 Q Did you have any input or did you approve the notice
 7 of voluntary quit that was issued to
 8 Marilyn Figueroa?
 9 A No.
 10 Q Did anybody inform you that Marilyn Figueroa was
 11 going to be issued a notice of voluntary quit?
 12 A I'm not sure.
 13 Q If Marilyn Figueroa would have provided a medical
 14 leave a week or two after she was given a notice of
 15 voluntary quit, would that have sufficed to return
 16 her back to work?
 17 MR. TOKUS: Object to the form of
 18 the question. Frankly, I can't understand it.
 19 Q Go ahead.
 20 MR. TOKUS: Did you understand the
 21 question?
 22 THE WITNESS: I don't understand
 23 the question.
 24 MR. ARELLANO: Let me ask you to
 25 read it carefully. And if Mr. Tokus allows

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1 the reporter to complete reading the question,
2 you may be able to understand it.

3 (Question read)

4 MR. TOKUS: Did you understand that
5 question?

6 A I mean if somebody had a medical excuse --

7 MR. TOKUS: Did you understand the
8 question?

9 MR. ARELLANO: Would you just let
10 him answer the question, Mr. Tokus? You are
11 imposing --

12 MR. TOKUS: Frankly, I don't
13 understand the question.

14 MR. ARELLANO: Well, he does.
15 Apparently he does.

16 MR. TOKUS: Well, he thinks he
17 does.

18 A Well, I was trying to ask you --

19 Q My question is, sir, let me ask you to assume, based
20 on your practice, that Marilyn Figueroa produced a
21 medical authorization showing that she was on sick
22 leave and that authorization came a week or two
23 later. Would that have sufficed in order to
24 reinstate her?

25 A If the City had received whatever the appropriate
57

1 documentation was --

2 Q Or you.

3 A -- to give her documentation for medical leave? I
4 mean it's basically a question that answers itself.
5 I mean if everybody filed everything they're
6 supposed to file, then I assume that it would be
7 okay. But I think it's a hypothetical, very
8 hypothetical question.

9 Q I understand. If you would have received the
10 medical authorization from Marilyn's attorney, would
11 that have sufficed?

12 MR. TOKUS: Object to the form of
13 the question. It doesn't give us any time --

14 MR. ARELLANO: I don't wish to
15 argue with you, Mr. Tokus.

16 MR. TOKUS: -- date and place.

17 MR. ARELLANO: Just register your
18 objection.

19 A And I would answer I don't know.

20 Q You were her supervisor; isn't that correct?

21 A Through my chief of staff, yes.

22 Q Did you ever purchase flowers for Marilyn other than
23 after that sexual attack incident?

24 A No, no.

25 Q No? All right. Did there come a time when you
58

1 learned that during her employment with the City,
2 particularly with your office, Marilyn was trying to
3 clear her credit record after her divorce?

4 A No, I had no --

5 Q No?

6 A Not really.

7 Q Did you interview Marilyn Figueroa when she became
8 an employee of the City working for your office?

9 A Probably. I mean there would have been at least a
10 brief discussion.

11 Q Do you know --

12 A She was recommended by John Tries, former alderman
13 Mary Ann McNulty.

14 Q Do you know how much Marilyn Figueroa was making in
15 1999 before she left her employment?

16 A No.

17 Q Would it be fair to say that she was making over
18 \$50,000 a year?

19 A If that's what she was making. I mean we can just
20 look it up.

21 Q Right, okay. Did there come a time when you learned
22 that this job was providing stability in her life,
23 her family life?

24 MR. TOKUS: Objection to the form
25 of the question.
59

1 Q Go ahead, sir.

2 A I mean it was a good job. If you have a family, you
3 want to have a good job, so yeah.

4 Q It was -- did there come a time when you learned
5 that she purchased a home as a result of having this
6 good job with your office?

7 A I, I became aware that she purchased a new home.
8 She told me that.

9 Q And during all of the years that you have known
10 Marilyn, the home that she purchased, was this the
11 best home that you ever knew of all of the homes
12 that she lived in before?

13 A Well, I mean it's a matter of taste in what kind of
14 house you like. I thought the one on South 19th was
15 pretty nice.

16 Q Did she own the one on South 19th?

17 A No. She rented it.

18 Q And, but the only one that you know she purchased is
19 the one where she lives now?

20 A Correct.

21 Q Is that correct? In your view, based on your
22 experience and of course your way of looking at
23 things, do you feel that the neighborhood where she
24 lives now is a better neighborhood than the previous
25 neighborhoods where she lived before?
60

1 A On what criteria?
 2 Q Class-wise.
 3 A Or income maybe?
 4 Q Correct.
 5 A The income, I mean the income, the average income of
 6 the neighborhood that she's in now is higher than
 7 the average income in the neighborhood that her
 8 house on South 19th is in. I live in the one, in
 9 that neighborhood.
 10 Q During the time that --
 11 A So other than me, the income is pretty low in that
 12 neighborhood.
 13 Q During the time that you engaged in sexual acts with
 14 Marilyn Figueroa, it is clear that she was working
 15 full-time for your office; correct?
 16 A Yeah.
 17 Q Did there come a time during that period of time
 18 when she complained about discrimination with
 19 respect to her job?
 20 A Not really, not to me. I mean maybe she complained
 21 to other people, but I didn't -- she didn't complain
 22 to me much about it until the very end.
 23 Q Did she ever later on -- when?
 24 A Oh, I would say after the -- a long time after
 25 Brenda Wood was promoted she complained about that.

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1 But she didn't want -- she said she didn't want to
 2 bother me with it, that I shouldn't be concerned
 3 about it. You know, that was it. She didn't really
 4 spend a lot of time complaining to me about it.
 5 Q Did she ever complain --
 6 A I know that she must have complained to other people
 7 about it I think.
 8 Q Did she ever complain about your office placing her
 9 in what she considered a Hispanic box kind of
 10 position?
 11 A No. She didn't complain to me about that. I, I
 12 myself feel that it's important for people to have
 13 broad duties. For example --
 14 Q Well, my question, sir, is did she ever complain to
 15 you --
 16 A No.
 17 Q -- of having been placed in a Hispanic box?
 18 A No.
 19 Q Did she ever complain about not allowing her to work
 20 in other areas, other than just minority issues?
 21 A Well, I think she liked to work on economic
 22 development issues.
 23 Q My question, sir, is did she ever complain?
 24 A I wouldn't categorize it as a complaint.
 25 Q Did she ever raise that issue?

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1 A I think she was eager to work on economic
 2 development issues.
 3 Q Was she ever allowed to work on economic development
 4 issues?
 5 A On some issues.
 6 Q Did she ever apply for any position outside this
 7 area where she was assigned to for the most part?
 8 A She may have. I'm not aware of it.
 9 Q You testified that during the alleged consensual
 10 relationship you had anywhere between 10 to
 11 12 sexual encounters with Ms. Figueroa; correct?
 12 A Correct.
 13 Q Can you break them down for me? Was that once a
 14 year, twice a year?
 15 A Well, if you take five years and divide it by 12,
 16 that would give you the number.
 17 Q And is that formula applicable to the actual acts
 18 that you engaged in with Marilyn Figueroa?
 19 A In terms of intercourse, 10 to 12, so that would be
 20 about twice a year.
 21 Q Did you have any sexual intercourse with
 22 Marilyn Figueroa in 1997?
 23 A I think I did. That was the time when we were at
 24 the Palmer House Hotel together in September of
 25 1997.

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1 Q Did there come a time in 1998 when Marilyn attempted
 2 to quit her job?
 3 A Not that I know of.
 4 Q Did she ever threaten to quit her job in 1998?
 5 A Not to me.
 6 Q Have you ever talked to her about not quitting her
 7 job?
 8 A No, I didn't.
 9 Q Now, during those incidents --
 10 A I mean let me answer the question. I think I'm
 11 answering your question. Stop me if I'm not. But
 12 she had other jobs that apparently she was offered
 13 like working for Hope House, and I encouraged her to
 14 take that job.
 15 Q My question is do you recall whether or not
 16 Marilyn Figueroa in 1998 left her employment with
 17 the City because she was upset about the way she was
 18 being treated by you?
 19 A No.
 20 Q Or the way she was being treated by the office --
 21 A No.
 22 Q -- staff? All right. Now, so when you're talking
 23 about one or two intercourse events per year, you're
 24 not talking about something, a consensual
 25 relationship that was taking place on a weekly

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1 basis, monthly basis?

2 A No.

3 Q It was sporadic; is that correct?

4 A I don't know whether sporadic is the perfect term to
5 describe it, but it was -- there was a distance of
6 time between each encounter.

7 Q Well, when those incidents occurred, Mayor --

8 A Yeah.

9 Q -- did you ever force Marilyn Figueroa to let you
10 have anal sex with her?

11 A I never forced her to do anything.

12 Q Did you have anal sex with Marilyn Figueroa?

13 A Yes.

14 Q Do you believe that that was something that she
15 requested?

16 A It was something that was consensual.

17 Q When you engaged -- when you engaged in anal sex
18 with Marilyn Figueroa, you believe she enjoyed that?

19 A I don't know that either of us enjoyed it very much.
20 We didn't do it again. We just did it once.

21 Q When did that occur?

22 A On, I believe on October 16th of '99, whenever,
23 after the UMOS event.

24 Q UMOS; correct?

25 A Correct.

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1 or request that she pose for you with sexual type
2 garments?

3 A No.

4 Q Did she ever pose for you?

5 A On the occasion of the visit to the Palmer House
6 where she was staying, she did bring along a
7 negligee which she wore after we went to bed. I
8 mean she put on the negligee, we went to bed.

9 Q What was the purpose for you being in Chicago at
10 that time?

11 A I was at a board meeting after the Congress for New
12 Urbanism, and I stayed at a place called, I believe
13 it's the Chicago City Club.

14 Q Did you ask Marilyn to meet you in Chicago?

15 A Yes.

16 Q Did you give her cash to pay for the hotel?

17 A I gave her part of the money it would cost to pay
18 for the hotel.

19 Q How much did you give her?

20 A I don't remember, but it was maybe 150, something
21 like that.

22 Q Was there another time when you asked Marilyn to
23 meet you at a convention, at the democratic
24 convention?

25 A Yes.

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1 Q Did she meet you there?

2 A No. I received a phone message on my hotel phone
3 saying that her car had broken down on the freeway
4 -- there was truck noise in the background -- and
5 that she wasn't, it was going to be difficult for
6 her to make it.

7 Q Did you call her house?

8 A No.

9 Q Did you call her cellular phone?

10 A I may have tried to call her house. I don't
11 remember. But I --

12 Q What did you do to try to locate her?

13 A I was worried that something, she might have had an
14 accident or, you know, having a car on the freeway
15 she might get hurt. So I called my former security
16 guard and at that time police captain or deputy
17 inspector Arthur Jones, asked him to check with the
18 Illinois and Wisconsin State Patrol and see if there
19 had been an accident or if anything had happened to
20 Marilyn.

21 Subsequent to that Marilyn told me that she
22 had been able to contact her brother. Her brother
23 came down and helped her take care of the car and
24 come back home.

25 Q Did she ever have a car accident at that time?

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1 Q During that incident did you request that she allow
2 you to have anal sex?

3 A It was mutual and consensual. I don't remember who
4 asked who.

5 Q During that time in October of 1999 when this anal
6 sex occurred, was she having her monthly period,
7 menstrual period?

8 A I have no idea.

9 Q Did you ever ask Marilyn to let you have sexual
10 intercourse when she was having her menstrual
11 period?

12 A I never knew whether she was having her menstrual
13 period or not.

14 Q Did she ever tell you when she was having her
15 menstrual --

16 A No.

17 Q When you were having this exchange, did you ever
18 demand that she give you oral sex?

19 A I never demanded her to do anything. She did --
20 MR. TOKUS: Wait. You've answered
21 the question. Stop right there. No question
22 pending.

23 Q Did she engage in oral sex with you?

24 A Yes, yes.

25 Q When she was your subordinate, did you ever demand

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1 A No.
 2 Q The original feeling, the original information you
 3 had was that she had a car accident?
 4 A No, not a car accident. That her car had broken
 5 down. She told me on the message on the phone, and
 6 she sounded distressed, that her car had broken
 7 down.
 8 Q Was there any other time when you asked her to meet
 9 you at different areas, conventions?
 10 A No.
 11 Q Work related events?
 12 A Are you referring to out of town? No.
 13 Q Correct. Now, when the trip to Chicago took place,
 14 were you staying in a separate room?
 15 A I was staying in a separate hotel.
 16 Q And who suggested that -- where did she stay?
 17 A At the Palmer House.
 18 Q And who suggested that she stay at the Palmer House?
 19 A Well, I probably did, but it was a place she was
 20 familiar with how to get there.
 21 Q And before when you invited her to meet you in
 22 Chicago --
 23 A That's where I was staying there.
 24 Q Did you tell her that you would pay for the hotel?
 25 A You mean in '96 or '97?

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1 A I was invited by UMOS, but I think Marilyn
 2 encouraged me to go.
 3 Q And was Marilyn your representative with the
 4 Hispanic community?
 5 A Yes. Well, she was staffing that meeting, yes.
 6 Q And was anyone else at that particular banquet?
 7 A Anyone else --
 8 Q From your staff.
 9 A No.
 10 Q Was Kimberly Pratt present?
 11 A She might have been, but I don't remember that.
 12 Q From your office who attended that particular
 13 function?
 14 A Marilyn Figueroa.
 15 Q And again, you don't remember if Kimberly Pratt was
 16 present at that time?
 17 A No, I don't.
 18 Q And then from the UMOS banquet -- by the way, did
 19 you drive alone to the banquet?
 20 A No.
 21 Q How did you get there?
 22 A Security.
 23 Q Was Marilyn already at the banquet by the time you
 24 got there?
 25 A Yes.

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1 Q When she stayed at the Palmer House.
 2 A Okay, '97. I gave her enough money to pay for most
 3 of the room. I think it probably cost more than
 4 what I gave her.
 5 Q And you gave her cash?
 6 A Correct.
 7 Q Is that correct?
 8 A Correct.
 9 Q And you paid for the other room how?
 10 A The room I was at?
 11 Q Yes.
 12 A That was paid for by a gentleman named Elmer Johnson
 13 who's a former CEO of GM. He paid for all the board
 14 members of the CNU. He's an active member of the
 15 Congress for New Urbanism.
 16 Q When --
 17 A It was a private club that has hotel rooms like the
 18 University Club or the Madison Club, you know,
 19 whatever.
 20 Q When the incident of October 1999 occurred, where
 21 you engaged in anal sex with Marilyn Figueroa, you
 22 stated that you had attended a UMOS conference?
 23 A It was their annual banquet.
 24 Q Annual banquet. And were you there at the request
 25 of Marilyn Figueroa or were you invited by UMOS?

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1 Q Who was your security driver at that time?
 2 A I don't know.
 3 Q If it was in 1999 --
 4 A It could be -- I mean we could look it up and try to
 5 find out.
 6 Q Was that Ms. Velasco?
 7 A I'm not sure.
 8 Q How late did you stay at this UMOS banquet?
 9 A Probably about 20, 25 minutes after it ended.
 10 Q And then where did you go?
 11 A Home.
 12 Q Where?
 13 A To my house.
 14 Q Did Marilyn go with you?
 15 A No.
 16 Q So at what point did you have anal sex with
 17 Marilyn Figueroa on October 16th of 1999?
 18 A She called to see whether or not she could come
 19 over. She came over in her car.
 20 Q To your house?
 21 A In her car. And we embraced and had sex.
 22 Q When you had anal sex with Marilyn Figueroa, did you
 23 think she found this a welcome practice, Mayor?
 24 A She didn't object, and I didn't -- I don't think
 25 either of us particularly enjoyed it.

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1 Q Was she the one who asked you to engage in anal sex
2 at that time?
3 A I'm not sure that that's the case. I wouldn't say
4 that. It wasn't something that either of us I think
5 were pushing particularly hard. We just did it.
6 Q And where was your wife on that day?
7 A Out of town.
8 Q How late in the evening did you meet with
9 Marilyn Figueroa at your house?
10 A I would think it would have been at least 11 o'clock
11 maybe.
12 Q And at that time where did you begin to engage in
13 any type of physical contact?
14 A On that night?
15 Q Correct.
16 A I was sitting at the banquet table and Marilyn
17 brought up some notes for me to speak, and she
18 leaned into my back and pressed her breasts against
19 my shoulders.
20 Q This is at your home?
21 A No. That was at the UMOS banquet.
22 Q I'm talking about once she got to your home. Where
23 exactly --
24 A Oh, we were in the, we were in the front room and we
25 kissed and it was -- I mean there was -- and

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1 A There's a stairway in the front room. There's a
2 front room and a living room, but they're almost
3 like one room. There's a stairway that goes
4 upstairs.
5 Q Did you at all kiss or do anything physical by the
6 stairway?
7 A Not that I know of.
8 Q It could have happened?
9 A I don't think so. I think we were pretty much in
10 the living room.
11 Q When you say you don't think so, I just want to know
12 what you know as opposed to --
13 A Yeah. My memory is that we were in the living room.
14 Q Let me ask you to just draw for me if you will,
15 sir --
16 A Here, I've got it.
17 Q All right. The --
18 A Front steps of the house. Doorway. Here's the
19 room. There's a doorway and then another doorway to
20 keep the cold out. And then there's a, what we call
21 the front room. And then the living room.
22 Q And where are the stairs?
23 A The stairs would be right here.
24 Q So this would be what, the front room?
25 A Yeah.

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1 embraced each other.
2 Q You embraced each other in what location of the
3 house?
4 A The living room.
5 Q And then what happened next?
6 A Well, eventually -- I can't really remember the
7 exact details. I assume we helped each other take
8 our clothes off.
9 Q Where did you actually engage in anal sex?
10 A In the living room.
11 Q In your living room?
12 A Yeah.
13 Q Where? Floor, the couch?
14 A Next to the couch on the floor.
15 Q The living room, what color is your couch where you
16 engaged in anal sex with Marilyn Figueroa?
17 A It's, I'm partially color blind so I'm not great on
18 colors, but it's something kind of taupe green with
19 a flower pattern.
20 Q So you moved from the front room into the living
21 room? I just want you to walk me --
22 A Well, it's basically like one big room. We embraced
23 standing up and we kissed, petted, whatever you want
24 to call it.
25 Q Is there a stairway in the living room area?

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1 Q Why don't you write down front. Would you write
2 down front. And this would be the living room?
3 Would you write down living room.
4 A Yeah.
5 Q Then stairs right here.
6 A Couch would be right here.
7 Q And it was on the couch where you engaged in anal
8 sex with Marilyn Figueroa?
9 MR. TOKUS: Objection, counselor.
10 That's not what the record states.
11 Q I'm asking you.
12 A No, it was right next to the couch on the floor. We
13 were on the floor.
14 Q Were you on the couch at all at any time?
15 A Probably when we were kissing.
16 Q When you say probably, I just want to know exactly.
17 A I mean I can't tell you exactly. It's a long time
18 ago. It's hard to remember all the details. But
19 my -- I think it's very likely we were sitting on
20 the couch before we did anything more.
21 Q So as I understand, you are telling me that you
22 moved from the front room into the living room
23 eventually?
24 A Yeah.
25 Q Correct?

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1 A We would have -- when she came there, I would have
2 opened the door. We probably embraced right here.
3 And then we would have walked over here.
4 Q To the couch?
5 A Yeah.
6 Q Did you ever sit down on the couch or --
7 A I'm not sure but probably.
8 Q Did you engage in any type of sexual acts while on
9 the couch?
10 A We would have kissed and embraced. That's what I
11 would expect.
12 Q Did you assist Marilyn in getting undressed, if
13 that's what she did?
14 A I'm not sure, but I mean sometimes she would take
15 her own clothes off. Sometimes she would help take
16 my clothes off.
17 Q On this particular time.
18 A I think she probably took her own clothes off.
19 Q Well, probably is something you are assuming; right?
20 Do you recall exactly what she did?
21 A Yeah. I mean I don't think I ever took all of her
22 clothes off. Sometimes she would take her own
23 clothes off. Other times I would help her.
24 Q And I want you to tell me on that day what do you
25 remember happening?

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A I remember that we had -- we embraced. We kissed.
We went into the living room and had sex.
Q This is the incident of October 16th; correct?
A Correct.
Q Can you write down here October 16th, 1999. Now, do
you recall any one time when Marilyn Figueroa cried
as a result of any of the sexual exchanges you had
with her?
A No.
Q In 1999 tell me at what point did you decide to, as
you put it, to terminate the relationship,
Mr. Norquist?
A I wouldn't claim that I decided to terminate the
relationship. I think it was a mutual thing. In
fact, I thought it was better that she was, wanted
to terminate it rather than me terminating it, a
better way to end it if we both wanted to end it.
Q She had shown a desire to end the relationship?
A We had a phone call sometime after the time that we
were last together in the end of November, beginning
of December, and she said that she wanted to end the
relationship.
Q Did she tell you she didn't want you to bother her
anymore?
A No, she never said that.

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1 Q But she basically was telling you she didn't want to
2 continue with it?
3 A Yeah. Neither did I.
4 Q At what point did you give her -- did you ever give
5 her the bracelet?
6 A I did, yes.
7 Q What was the reason for giving her a bracelet?
8 A It was almost Christmas. I said it was a Christmas
9 present.
10 Q All right. Before that had you had any type of
11 disagreement with Marilyn Figueroa?
12 A No. I mean it's not every day was, you know,
13 happiness. It wasn't a -- it was an unusual
14 relationship in that there was so much time between
15 when we were together. When I gave her a present
16 for Christmas and that she gave me a present for
17 Christmas.
18 Q What did she give you?
19 A She said to come into her bedroom, the downstairs
20 bedroom in her house and she had some massage oils,
21 three different kinds of massage oil. And she asked
22 which one I wanted, I wanted her to put on me. And
23 then she gave me a massage.
24 Q What kind of -- what exactly did she give you?
25 A I can't remember, but it was three different kinds,

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1 maybe pine scent.
2 Q Did you keep those oils?
3 A No.
4 Q What did you do with them?
5 A I just left them there.
6 Q Left them at her home?
7 A Yeah.
8 Q This occurred at her home; is that correct?
9 A That's correct.
10 Q And what did you --
11 A I didn't think the gift was the massage oil. I
12 thought the gift was the massage.
13 Q And this occurred on what specific date?
14 A Earth November 29th or December 2nd or some date
15 right around there. That was the last time. I gave
16 her the bracelet the last time we were together, and
17 she gave me the massage the last time we were
18 together.
19 Q So that would have been December 29th or
20 December the 2nd? I just want to know exactly --
21 A It would have been November 29th or the 2nd. I'm
22 fairly certain it was one or the other. It could
23 have been December 3rd or November 30th or
24 something, but as best as I can determine.
25 Q Let me see if I understand what you're telling me.

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1 On November, late November 29th --
 2 A Let's make this the last question before a bathroom
 3 break.
 4 Q All right. I'll make a deal with you on that one.
 5 A Okay.
 6 Q Your testimony is that on November 29th or
 7 December 2nd you engaged in sexual conduct with
 8 Marilyn Figueroa at her house?
 9 A Yes. She picked me up at my house. We went to her
 10 house.
 11 Q And then it was during that time when she also gave
 12 you a Christmas gift?
 13 A Yeah.
 14 Q All right.
 15 A Yes.
 16 Q And you gave her a Christmas gift; is that right?
 17 A Yes.
 18 Q And then the next day the relationship ended?
 19 A I think so, yeah. Or maybe it was three or four
 20 days later, but it could have been -- if it happened
 21 on the 29th, then the phone call might have been on
 22 the 2nd or the 3rd. But --
 23 Q And you believe that she wanted to end the
 24 relationship. What did she tell you with respect to
 25 that?

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1 A She said that she didn't want to have the
 2 relationship anymore, that she was, wanted to focus
 3 on other things.
 4 Q All right. Did that bother you at all?
 5 A Not really because I thought that it was good. If
 6 she wanted to end the relationship and it ended and
 7 we both wanted to end it, that that was a good way
 8 to do it. If I was ending the relationship and she
 9 wanted to keep it going, I saw trouble.
 10 Q On November 29th or December 2nd, whenever you
 11 exchanged these gifts, did she mention anything
 12 about wanting to end the relationship at that time?
 13 A No. She didn't seem buoyant and really happy. When
 14 she took me back home, we didn't really talk much.
 15 I tried to talk about some deteriorated buildings
 16 that were around Muskego and Bay Street, and she
 17 didn't seem to really want to talk much about. So I
 18 felt like --
 19 Q I just, Mr. Norquist, I just want to know --
 20 A It seemed kind of unhappy. I wasn't surprised that
 21 it ended.
 22 Q On November 29th when you met with her?
 23 A Yeah, the 29th or the 2nd.
 24 Q Before November 29th do you recall any other time
 25 when she wanted to end the relationship?

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1 A Yes.

2 Q When was that?

3 A Early in October.

4 Q Go ahead.

5 MR. TOKUS: Just a minute. I want
6 to state an objection. You're missing --7 MR. ARELLANO: You're trying to
8 interrupt. He's not even done answering --9 THE WITNESS: Yeah. I'm supposed
10 to go to the bathroom.11 MR. TOKUS: May I state my
12 objection, counsel? May I state my objection,
13 counsel?14 MR. ARELLANO: You don't have to
15 ask --16 MR. TOKUS: May I state my
17 objection?18 MR. ARELLANO: Go for it,
19 Mr. Tokus.20 MR. TOKUS: May I finish my
21 objection, counsel?

22 MR. ARELLANO: Go for it.

23 MR. TOKUS: I'm objecting to the
24 characterization of when they ended the
25 relationship. And you're putting the emphasis

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1 on ending the relationship --

2 MR. ARELLANO: Hold on a second.
3 Hold on a second, Mr. Tokus. Just register
4 your objection in a lawyer-like manner and
5 don't engage in speeches because you are
6 indirectly coaching this witness.

7 MR. TOKUS: Have you finished?

8 MR. ARELLANO: I am telling you.

9 MR. TOKUS: Have you finished?

10 MR. ARELLANO: I am telling you.

11 MR. TOKUS: Have you finished?

12 MR. PINES: I think it's time for a

13 break.

14 MR. ARELLANO: Hold on a second. I
15 will not take a break until I finish with my
16 question.17 MR. PINES: Why don't we take a
18 break.19 MR. TOKUS: And I'm not going to be
20 lectured by you, counsel.21 MR. ARELLANO: You're doing this
22 intentionally, Mr. Tokus. Go ahead and raise
23 your objection. Otherwise I'm going to ask my
24 next question.

25 MR. TOKUS: I'm stating the

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1 objection to the way you're characterizing
2 what occurred on the 29th.
3 MR. ARELLANO: That's fine.
4 Q Did there come a time, Mr. Norquist, when you
5 learned that Marilyn Figueroa intended to file a
6 discrimination complaint?
7 A I'd say sometime in mid to late January.
8 Q How did you learn of this fact?
9 MR. TOKUS: Now I'm making an
10 objection, counsel.
11 THE WITNESS: Now let's do the
12 bathroom thing.
13 MR. TOKUS: That's the objection.
14 Q Sir, how did you learn of that fact?
15 THE WITNESS: I really have to use
16 the rest room.
17 MR. TOKUS: Hold on, hold on.
18 MR. ARELLANO: Judge, I'm going to
19 stop this deposition if you continue to
20 interfere with my deposition.
21 MR. TOKUS: Take your break, take
22 your break, take your break.
23 MR. ARELLANO: You are interfering
24 with my deposition, Mr. Tokus.
25 MR. TOKUS: The man asked for a
85

1 Q Anyone else?
2 A Well, later on Mike Soika.
3 Q When did you share the information regarding your
4 sexual interaction with Marilyn Figueroa with
5 Mr. Soika?
6 A Probably on January 6th.
7 Q And --
8 A It could have been on the 5th but I -- I talked to
9 Bill Christofferson about it on the afternoon of the
10 5th, and then I called my wife and disclosed it to
11 her at 4 o'clock that afternoon. We met at our
12 house.
13 Q So let me see if I understand this. You disclosed
14 your sexual exchanges with Marilyn Figueroa with
15 Mr. Christofferson on January 5th of the year 2000?
16 A Yes. That I had a relationship with her. I didn't
17 go into the detail we've gone into today.
18 Q Where did you share this information with
19 Mr. Christofferson?
20 A In my office. He came in and we talked. I think it
21 was around the noon hour sometime. Go ahead.
22 Q Did you summon him to come and see you?
23 A No. He came in to see me.
24 Q And then again you spoke to Mr. Soika on January the
25 6th, 2000 about this interaction you had with
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1 rest room break more than once.
2 Q Just answer this question and then we can take a
3 break.
4 MR. TOKUS: No, no.
5 Q How did you learn of this particular fact?
6 MR. TOKUS: I'm informing you not
7 to answer. It's time for your break. Take a
8 break.
9 (Recess)
10 By Mr. Arellano: (Continuing)
11 Q Mayor Norquist, you testified before that you don't
12 know of any individual before December I believe,
13 before you terminated the relationship, or the
14 relationship ended as you put it, you don't know of
15 any individual that was aware of this alleged
16 consensual relationship you had between Marilyn and
17 yourself?
18 A No, I don't.
19 Q And did there come a time when you disclosed that
20 information to anyone after the relationship ended
21 as you put it?
22 A In January, yes.
23 Q Who, if anyone, did you share that information with?
24 A I shared it with Bill Christofferson and my wife
25 Susan Mudd.
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1 Marilyn Figueroa?
2 A I think so. It could have been on the 5th, but I
3 think it was on the 6th.
4 Q And then you spoke to your wife on what day?
5 A On the 5th at 4 o'clock at my house, our house. We
6 met. I asked her to come home from work early.
7 Q Now let me ask you this. Is it fair and accurate to
8 say that Mr. Christofferson would have been the
9 first person that you disclosed your sexual
10 interaction with Marilyn Figueroa?
11 A Yes.
12 Q Is that correct? And then your wife would have been
13 the second individual?
14 A Correct.
15 Q And then it would have been Mr. --
16 A Let me just correct that to say that with
17 Christofferson, initially I think I was just
18 disclosing to him that we had had a relationship. I
19 didn't get into any detail with him.
20 Q And I understand that. But I want to understand the
21 chronology. As I understand, Christofferson would
22 have been the first person, correct?
23 A Correct.
24 Q And then on the same day you disclosed the same
25 information to your wife?
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1 A Correct.
 2 Q Is that correct? And then on the 6th you disclosed
 3 that information to Mr. Soika?
 4 A I think so. Although it's possible that I could
 5 have disclosed it to Soika on the evening of the
 6 5th. I don't remember.
 7 Q Do you know when Marilyn Figueroa left her place of
 8 employment, Mayor?
 9 A Yeah, around noon on January 4th, and I saw her on
 10 the way out in the hallway outside the Mayor's
 11 office.
 12 Q Did you greet Marilyn Figueroa before she left?
 13 A Yes, I said hello.
 14 Q Did you smile at her?
 15 A I didn't smile. I just said hello.
 16 Q Did she respond?
 17 A Yeah. But sort of monosyllabic. I don't remember
 18 any particular word.
 19 Q How would you describe her demeanor? Did she look
 20 depressed to you?
 21 A It wasn't cheerful but, you know, she wasn't, she
 22 didn't -- she wasn't angry either.
 23 Q Where were you located when you encountered
 24 Marilyn Figueroa on the 4th?
 25 A Right where the railing starts in the atrium. If
 89

1 you want, I can draw a map of it.
 2 Q That's all right. I just want to know where that
 3 occurred.
 4 A Yeah. She was leaving. I was coming in.
 5 Q So she left on the 4th?
 6 A Correct.
 7 Q Did you have any further contact with
 8 Marilyn Figueroa on that day?
 9 A No, I did not.
 10 Q Did you ever have any further contact with
 11 Marilyn Figueroa after January the 4th?
 12 A No.
 13 Q 2000?
 14 A No.
 15 Q Did there come a time when you suspected that
 16 Marilyn Figueroa was not coming back to work?
 17 A Bill Christofferson when he came in on the 5th said
 18 that he had had an emotional meeting with Marilyn,
 19 that Marilyn had been emotional and cried. He was
 20 concerned about that.
 21 Q When did he disclose that to you?
 22 A I think on, roughly noon on the 5th.
 23 Q On the 5th?
 24 A Yeah.
 25 Q Was that before -- was that before you disclosed
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1 your sexual exchanges with, that you had had with
 2 Marilyn, was that before you disclosed that with
 3 Mr. Christofferson that came from you that he had
 4 had an emotional exchange with Marilyn?
 5 A Yeah, that was before. And then later on we talked
 6 about it for awhile. He may have left to have lunch
 7 or something and come back. And as I remember it,
 8 we talked some more and then he asked whether or not
 9 there had been something between Marilyn and I. And
 10 I wasn't very comfortable saying this, but I said,
 11 finally said yes. And then I knew I had to call my
 12 wife because I didn't want anybody to tell her but
 13 me.
 14 Q Let me see if I understand this. Mr. Christofferson
 15 first raised the issue that he had had an emotional
 16 meeting with Marilyn Figueroa; true?
 17 A Well, that she was upset. He didn't say he was, but
 18 he said she was.
 19 Q I understand.
 20 A At the campaign of course.
 21 Q And he informed you of that before you disclosed
 22 your relationship with Marilyn; true?
 23 A That's correct.
 24 Q Did he describe what was the issue or issues that he
 25 discussed with Marilyn Figueroa?
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1 A He did but not in any particular detail.
 2 Q What did he tell you?
 3 A He just said that she was upset and she didn't want
 4 to really talk about it. You know, she didn't
 5 really describe it. He knew, he knew something was
 6 wrong.
 7 Q Where did this discussion regarding -- where did
 8 this discussion occur between you and
 9 Mr. Christofferson when he was relating to you --
 10 A In my office.
 11 Q In your office? And so then you left your office
 12 and then you came back?
 13 A He left. I'm not sure whether I went out for lunch
 14 or not.
 15 Q And then when he came back is when you disclosed?
 16 A We talked some more and I disclosed that there had
 17 been a relationship.
 18 Q When he told you that he had had an emotional, or at
 19 least Marilyn had had an emotional exchange with
 20 him, did you connect that in any way to your
 21 interaction with her? And I'm talking about your
 22 sexual interaction that you had had with her.
 23 A Well, I mean I was concerned. You know, I didn't
 24 want, for example, my wife to find out that I had
 25 had an affair. I was hoping it was over and that
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1 time would go by and heal things and it would never
2 happen.
3 Q So did you connect her emotional outburst with --
4 A It was of concern to me. I thought maybe it was. I
5 don't know quite how I connected it but --
6 Q What specifically prompted you to disclose to
7 Mr. Christofferson your relationship with
8 Marilyn Figueroa?
9 A Well, I think he felt like, you know, there was
10 something missing that he didn't know about. He
11 didn't push real hard, but I could tell that he was
12 concerned. And so he said is there a relationship
13 between you and Marilyn and was there something
14 between you and Marilyn, and I probably waited
15 awhile to answer that. Because really, you know,
16 this had been a secret for a long time. And I said
17 yes.
18 Q And did you disclose to Mr. Christofferson that you
19 had engaged in sexual acts with Marilyn Figueroa at
20 that time?
21 A I didn't get into any of the detail of it.
22 Q Did there come a time when you did?
23 A I think the next day I probably shared more with
24 him.
25 Q The next day?

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1 Q And what happened at that time?
2 A Well, he suggested that I might need legal counsel
3 if, you know, by then -- I don't remember. It might
4 have been on the 7th or something like that that we
5 had heard that she had asked for a form to file a
6 complaint. Anyway, whenever that was, it could have
7 been the 7th.
8 Q Well, let me ask you this. I just want to
9 understand at what point did you disclose to
10 Mr. Soika that you had had a sexual relationship
11 with Marilyn Figueroa?
12 A I think it was on the morning of the 6th, but it
13 could have been on the evening of the 5th.
14 Q How did the issue develop?
15 A Well, I just felt that he ought to know.
16 Q Who raised the issue?
17 A I did. I felt he ought to know.
18 Q Was that when he informed you that Marilyn was
19 intending to file a discrimination complaint?
20 A No. I think that came a little later. Because I
21 don't think we knew that at that point.
22 Q Well, I just want to know --
23 A I mean I didn't know for sure she intended to file a
24 complaint. I just know that she had asked for the
25 form.

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1 A Yeah. At some point, I would guess the next day.
2 Q So then after you spoke to Mr. Christofferson, what,
3 if any, advice did he give you with respect to
4 Marilyn Figueroa?
5 A Well, his advice was to just stop and think. You
6 know, he didn't really have any hard advice that
7 day. I mean he was surprised. I think he wanted to
8 think about it.
9 Q Did there come a time when he provided some advice
10 to you?
11 A Well, he was, you know, in effect the campaign
12 strategist. There was a campaign going on, you
13 know, how to deal with it if it came out and
14 whether --
15 Q What did he tell you as far as how to deal with it?
16 A Well, it's hard for me to, it's hard for me. Do you
17 want to come back to that? Was that a procedure you
18 can live with? Let me just think about it in the
19 back of my head and come back.
20 Q That's fine.
21 A Because I really don't remember exactly what he
22 said.
23 Q Then you met with Mr. Soika the next day after you
24 spoke to your wife; is that correct?
25 A Yeah.

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1 Q I understand that. But I just want to understand
2 the sequence here. I just want to know first, you
3 talked to Mr. Soika about your relationship with
4 Figueroa on the 6th in the morning; correct?
5 A Either then or the evening before, one or the other.
6 Q And what I want to know is what prompted you to
7 disclose that information to Mr. Soika?
8 A Well, I felt that he ought to know. I mean it was
9 the kind of thing that if it was -- if it was going
10 to be out, that he ought to know about it.
11 Q When did you discuss with Mr. Soika your sexual
12 relationship with Marilyn Figueroa?
13 A Probably on the telephone, or it could have been in
14 the morning in the office on the 6th.
15 Q And do you recall at what point he shared with you
16 the fact that Marilyn Figueroa was going to be
17 filing a discrimination complaint?
18 A I don't remember precisely, but it would have been
19 sometime after, whenever she asked for the form.
20 Q And I want to know when.
21 A It was pretty -- I mean these things move pretty
22 quickly, so it's hard to separate exactly what
23 happened when. I'll try. I'm trying honestly.
24 Q I understand. What I want to know is did Mr. Soika
25 share with you any information about the fact that

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1 Marilyn was filing a complaint the morning of the
 2 6th before you disclosed your sexual interaction
 3 with Marilyn Figueroa? Or was it --
 4 A No. I told him about the relationship before I knew
 5 anything about her, you know, actually filing a
 6 complaint.
 7 Q And when he, Mr. Soika, notified you that Marilyn
 8 was intending to file a discrimination complaint,
 9 where did this discussion occur?
 10 A Probably in my office. I'd say it's very likely
 11 that it was in my office.
 12 Q And then at some point what did -- Mr. Soika then
 13 suggested to get an attorney?
 14 A Yes.
 15 Q And what did you do next?
 16 A You mean did I get an attorney?
 17 Q Right.
 18 A Yeah. I hired Anne Shindell.
 19 Q Before you hired Anne Shindell, did you have any
 20 meetings involving Christofferson, Soika and
 21 yourself for the purposes of discussing how to deal
 22 with a potential complaint?
 23 A I don't think so. But we can look at the calendar
 24 and see if there was anything on. A lot of stuff
 25 was just depending on events as they rolled along.

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1 all of the meetings that we had with our attorney.
 2 Q Did Mr. Soika tell you how he discovered that
 3 Marilyn was intending to file a complaint?
 4 A I don't remember him telling me how he did anything,
 5 but I remember him telling me that he thought she
 6 was perhaps intending to file a complaint.
 7 Q Did you -- were you surprised by that, by that
 8 information that was provided to you by Mr. Soika?
 9 A Well, at that point I wasn't particularly surprised
 10 by anything. I mean just to go back to the
 11 impression I had from Christofferson about the
 12 meeting that he had with Marilyn was that my big
 13 concern was that suddenly the affair would be
 14 public, and that had all kinds of implications that
 15 were frightening, particularly my wife finding out
 16 without me telling her. And that was my concern.
 17 After that I mean things like whether or not she was
 18 filing a complaint seemed pretty small by
 19 comparison.
 20 Q Well, did there come a time when you discussed with
 21 Mr. Soika the type of complaint that you suspected
 22 she was going to be filing?
 23 A No. I mean at some point I saw a copy of a blank
 24 complaint form.
 25 Q When did you see that, Mayor?

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1 I mean we had, I'm sure that Bill and Mike might
 2 have talked some. But I don't think we had any big
 3 meeting or anything like that.
 4 Q Well, were there any meetings held where Marilyn's
 5 intent to file a discrimination complaint were
 6 addressed after Mr. Soika notified you that she was
 7 intending to file a complaint?
 8 A Well, obviously people would have been talking about
 9 it, but I don't -- I don't know that I'd categorize
 10 it as meetings.
 11 Q Well, tell me after you learned that she was
 12 intending to file a complaint, who else did you
 13 discuss the fact that she was -- that you became
 14 aware that she was intending to file a complaint?
 15 MR. PINES: I'm going to object to
 16 the extent that this attempts to elicit any
 17 answer describing any conversations with
 18 Susan Mudd, the Mayor's wife, and to that
 19 extent direct him not to answer the question
 20 to that extent.
 21 Q Was Ms. Susan Mudd present at any meetings where
 22 Marilyn Figueroa's potential filing of a complaint
 23 was discussed?
 24 A The only, the only meetings that she would have been
 25 at would have been meetings that were, some but not

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1 A Oh, I'd say probably on the 7th.
 2 Q Who showed you that complaint form?
 3 A Mike I would assume.
 4 Q Mike Soika?
 5 A Yeah.
 6 Q And did you ever discuss with anyone, and I'm
 7 talking about anyone that was working in your
 8 political campaign organization or within the
 9 Mayor's staff office, did you discuss with anyone
 10 else anything related to Marilyn filing a complaint,
 11 other than your attorney of course and your wife?
 12 A The only people that I talked to about any of this
 13 stuff were Mike Soika and Bill Christofferson. I
 14 didn't want to talk to anybody else about it other
 15 than, you know, obviously my wife and my attorney.
 16 Q After Marilyn left on January 4th, did you suspect
 17 she was not coming back?
 18 A Not that day. Actually I thought that she would
 19 come back from lunch. You know, I didn't know. She
 20 might have been scheduled to work on the campaign
 21 that afternoon, so I don't know. I did not -- there
 22 was nothing about the 4th that made me think that
 23 she wasn't coming back. I asked her about -- I can
 24 remember asking her about her neck, which she had
 25 had this whiplash thing from her accident. I asked

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1 her how her neck was doing and --
2 Q When did you do that?
3 A When she was passing on her way out. I said hi,
4 asked her about how her neck was doing. And I
5 don't -- her answer was sort of a nonanswer. It was
6 like okay but --
7 Q You're referring to January the 4th, 2000 --
8 A Yeah.
9 Q -- when she walked out of the office; is that
10 correct?
11 A Yeah. I mean she didn't seem real bubbly, happy.
12 She didn't say hi. But it was -- I, there was
13 nothing about that that led me to think she wasn't
14 coming back.
15 Q Did there come a time when you felt or suspected she
16 was not coming back?
17 A Yeah. When Bill talked to me about her talking to,
18 I mean being emotional.
19 Q That would have been on the 5th?
20 A On the 5th, yeah.
21 Q And after Marilyn Figueroa left and after
22 Mr. Christofferson told you that she had been quite
23 emotional during her meeting with him, did you ever
24 connect her emotional upset as she was speaking to
25 Mr. Christofferson with the sexual relationship that

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1 you had developed throughout the years?
2 A Yeah, of course. I mean the fear in my mind was
3 that she was about to tell the world about her or
4 something.
5 Q And once Mr. Soika told you that she was intending
6 to file a complaint, did you connect that complaint
7 with the sexual interaction you had with
8 Marilyn Figueroa before January 4th, 2000?
9 A Well, you mean in the back of my mind?
10 Q In your mind, right.
11 A I don't think anybody that was in an affair could,
12 you know, feel that --
13 Q So you made that connection?
14 A Yeah, I mean it wasn't a focus of conversation I had
15 with people but, you know.
16 Q You made that connection; true?
17 A Yeah. I was worried about the affair being revealed
18 to the world.

19 Q
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11 Q And do you recall whether or not Marilyn notified
12 your office about taking sick leave after
13 January 4th of the year 2000?
14 A I don't have any knowledge of that, no.
15 Q So --
16 A Well, actually, as I understand it, see I don't -- I
17 don't remember when I found out or anything, but at
18 some point she called in and talked to Deanna, the
19 receptionist, and said she was going to seek sick
20 leave. What the exact date of that is, I don't
21 know.
22 Q Now, as I understand --
23 A You can probably look it up. I mean it's
24 probably --
25 Q I'm sure. To your knowledge, do you know how much

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<p>1 medical sick leave Marilyn was entitled to in the 2 year 2000 after she left January 4th? 3 A No, I don't know that. 4 Q To your knowledge, was she entitled to any medical 5 leave? 6 A I don't know. I mean I -- if all employees -- 7 MR. TOKUS: Counsel, hold on. I'm 8 stating an objection here. I'm going to 9 object to the form of the question because 10 we're dealing -- you've dealt with two 11 separate topics in the same question here. 12 You dealt with one topic of sick leave and now 13 you're dealing with another one on medical 14 leave. I think there may be confusion on your 15 own part and possibly on the witness's part. 16 Q Go ahead, Mr. Norquist. 17 A Do you want to divide it into two questions -- 18 MR. ARELLANO: Let me ask the 19 reporter to read the question back. 20 (Question read) 21 A I have no knowledge of whether she was or not. I 22 assume to the extent that any other employee would 23 be, she would be. 24 Q Do you recall whether or not Mr. Soika discussed 25 with you Marilyn's termination as a voluntary quit 105</p>	<p>1 Q My question is did Mr. Soika ever notify you that he 2 was going to be issuing a notice of voluntary quit 3 termination notice to Marilyn Figueroa? 4 A Well, I'm not sure what a voluntary quit termination 5 notice is. 6 Q Well, did he ever tell you he was going to terminate 7 Marilyn Figueroa? 8 A No. 9 Q Did he ever ask you whether or not you felt 10 Marilyn Figueroa should be terminated? 11 A I mean he didn't use the word terminate. I think 12 what he was doing was processing -- you know, she 13 had left on January 4th. How do you ever resolve 14 that? You know, if somebody leaves and they're not 15 coming back, you know, at some point they're not 16 working for whatever the employer is. And he was 17 handling that. And that's the impression I had. 18 Q Well, did there come a time when he notified you 19 that he was going to end Marilyn Figueroa's 20 employment? 21 A Not in those words. I don't believe -- 22 Q Well, in any words. 23 A He told me that he was trying to process her leaving 24 and handle it, give her -- the impression I had, he 25 was trying to communicate to her that, you know, at 107</p>
<p>1 before she was terminated from the City of 2 Milwaukee? 3 A Only in that he said that he was talking to 4 Jeff Hansen, the head of the Department of Employee 5 Relations, to make sure that whatever procedures he 6 followed were proper to deal with the matter, 7 whether it was reinstatement, termination, new job 8 assignment, whatever, that whatever the Department 9 of Employee Relations would do in other cases would 10 be the same as with her. There wouldn't be any 11 particular -- 12 Q What I want to know, Mayor, is whether or not 13 Mr. Soika ever notified you that he was going to be 14 issuing a voluntary quit termination notice to 15 Marilyn Figueroa. 16 A I think he said something to me about that. I don't 17 really -- I don't think I really understood what 18 the, what exactly that means. I mean I'm not an 19 expert in the fine details of employment law. But I 20 had confidence in him that he was handling it in a 21 way that was, in a way that was following procedures 22 of the Department of Employee Relations, whatever 23 that was. 24 Q And I just want you to -- 25 A I'll answer it again. Ask it again. 106</p>	<p>1 some point you have to come back or you're not 2 working for the City anymore. Whether that's by 3 mail or phone or, you know, somehow let her know so 4 she had every opportunity to come back in a timely 5 manner if she did. That was the impression I had. 6 Q When did he provide to you this information that you 7 just mentioned here today? 8 A Well, I would suppose sometime in the, you know, the 9 middle of the month, you know. Whenever -- sometime 10 between, you know, the 14th and whenever it was in 11 February that she was no longer considered on the 12 payroll. 13 Q All right. Up to that time you knew 14 Marilyn Figueroa had requested sick leave directly 15 from one of the clerical members of your office; 16 correct? 17 A I didn't talk to her directly. 18 Q You were aware of that? 19 A I was aware of it, yes. 20 Q 21 22 23 A 24 25 Q And did you ever ask Mr. Soika to determine whether 108</p>

or not Marilyn Figueroa was actually unable to return to work before she was terminated?

A Did I direct him to do that?

Q Correct.

A No. What I -- my feeling was is that it should be handled like any other case would be in a similar situation. And I wouldn't typically, or ever for that matter get involved in that level of detail.

MR. ARELLANO: Let me take five minutes break and I'll be continuing.

(Recess)

By Mr. Arellano: (Continuing)

Q Mr. Norquist, you testified earlier that there was another time when Marilyn Figueroa attempted to end the relationship before 1999; is that correct?

A Well, I don't know if I'd say attempted. I think it ended. That was --

Q I'm talking before 1999.

A Right. I am. Early in October or late September, I think it was probably early in October of '99 she asked to come to my house to talk about how, about something. So she came to the house. We sat down. She was in a chair. I was in another chair. And she said that -- and she gave me some back, a jewelry, a necklace that I had given her. She gave

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1 I didn't. I can't say what she thought, but I didn't.

3 Q Did there come a time when, during these long periods of time when there was nothing happening, did there come a time when you would call her often and she would not respond to your phone calls?

7 A No. We had a signal which was that -- I mean obviously she wasn't comfortable calling my house, so she didn't call too often at my house, maybe three or four times over the whole course of the relationship.

12 Q So you would call her house?

13 A Let the phone ring twice and then hang up. And then if she wanted to talk or if she was home or if she was busy with something else, then she wouldn't pick up. If she -- then I would hang up and then call again. If she didn't -- if she wasn't there, then I assumed she wasn't there or had something else to do.

20 Q So there were times when you would call and she would not respond for whatever reason?

22 A Right.

23 Q Is that correct?

24 A Right. I have no idea what the reason would be.

25 Q The times when these sexual encounters occurred, I

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me that and she gave --

Q At that time did she express a desire to end the relationship? That's what I want to know.

A Yes.

Q Any other time before that?

A No.

Q What about in 1998? Do you recall Marilyn indicating a desire to end the exchanges you were having with her?

A No, no.

Q And in October of 1999 what, if any, reasons --

A There were times throughout the relationship from '94 right to the end where I felt like the relationship was over. I was kind of glad it was over. And then we would be attracted to each other and it would start up again.

Q So there were other times when you felt she also wanted to end the relationship before?

A She didn't say anything about it.

Q But she would stop?

A Well, we would just not be together, talk to each other, other than, you know, just at work. There would be long periods of time. That's why, you know, divide five years into 10 times. I mean there were periods where we just didn't think about it, or

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1 mean how did they occur? Did you just feel like you wanted to have sex and called Marilyn Figueroa, or how did they occur? Let's talk about --

4 A No, there would be -- there would be -- I mean originally before the affair even started she would look at -- look me in the eyes. We would sit together.

8 One time we were at a church service, an Alderman Witkowiak was there, and we were sitting together but it was like sparks flying or attraction between us. But nothing came of it.

12 Another time --

13 Q Well, did there come a time when you initiated the idea to have --

15 A Well, I think it happened both ways. I mean sometimes --

17 Q Well, how many times do you recall --

18 MR. PINES: Excuse me, the witness hasn't answered the question yet.

20 Q How many times do you recall out of the 10, 12 that you described, how many of those did you initiate?

22 MR. PINES: Excuse me, are you withdrawing the previous question?

24 MR. ARELLANO: Counsel, I'm going to entertain anything Mr. Tokus wants to

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1 object to.

2 A Okay.

3 Q Out of 10, 12 times, how many of those times do you
4 believe you were the one who initiated the idea to
5 engage in sexual intercourse?

6 A Oh, I'd say half.

7 Q Half of them? Okay. The ones in 1999, October,
8 November or December, did you initiate any of them?

9 A I would say that the one at UMOS she initiated.

10 Q The other two?

11 A The other two we -- I would say that it was a mutual
12 thing. We would discuss it. She would express her
13 disappointment that we never stayed overnight
14 together. That bothered her about the Chicago, the
15 time we were in Chicago.

16 Q Which one in December did you initiate?

17 A I think both of the other ones were mutual. I mean
18 it's hard -- when you have two people that are in a
19 relationship, the communication is, you know, it's
20 not necessarily one way.

21 Q But you testified that this would happen --

22 A I'm not saying that it was all initiated by her.

23 I'm just saying it was a mutual thing.

24 Q I understand that. But you testified that this
25 relationship occurred 10 to 12 times during the

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1 entire period and that you probably initiated half
2 of them. And what I want to know --

3 A Well, let me just correct it by saying --

4 Q Hold on. Let me finish my question, sir.

5 A All right.

6 Q And what I want to know, the ones in December, did
7 you initiate any of those?

8 A Not by myself. I think we talked on the phone and
9 tried to find a way to meet.

10 Q In October of 1999 when she expressed a desire to
11 end the relationship, what, if any, reason did she
12 give you for wanting to end the relationship?

13 A Well, she felt, she said that I had betrayed her
14 because I hadn't helped her get the Brenda Wood
15 position, I hadn't stood up for her. My feeling was
16 it was inappropriate for us to connect the
17 relationship and whatever desire she had for a
18 promotion in the workplace.

19 Q Anything else that she gave you as a reason for
20 wanting to end the relationship at that time?

21 A She said that she had loved me and thought that I
22 had loved her and she felt that that wasn't true
23 anymore and therefore she didn't want to do it, she
24 didn't want to have the relationship.

25 Q Did you at any point during October 1999 when she

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1 expressed a desire to end the relationship or

2 December of 1999, did you ever mention anything
3 about wanting to return to your wife?

4 A I didn't have to return to my wife. I was with my
5 wife.

6 Q That wasn't my question. Did you ever mention
7 anything to that effect?

8 A Ask that again.

9 MR. ARELLANO: Do you want to read
10 that question.

11 (Question read)

12 A I said that I thought that it was a good idea that
13 we end our relationship and that it was not good for
14 my wife, it wasn't good for my kids, and it wasn't
15 good for her kids for us to continue the
16 relationship.

17 Q Well, have you or any of your attorneys ever stated
18 that when the relationship ended you told
19 Marilyn Figueroa that you wanted to go back to your
20 wife? Did you ever -- do you understand my
21 question?

22 A I don't -- saying that to --

23 MR. PINES: Stop. I'm going to
24 object to the question to the extent that it
25 asks for any information involving

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1 conversations with Mayor Norquist's attorneys.
2 And to that extent, I'm going to direct him
3 not to answer that portion of this multiple
4 part question.

5 Q Well, my question to you, Mayor, is did you ever
6 tell Marilyn specifically that you wanted to end the
7 relationship because you were going back to your
8 wife?

9 A Those aren't the words I used, no.

10 Q Did you say anything to that effect that you wanted
11 to go back to your wife?

12 A I said that it was good for me to go -- yes. Not go
13 back to my wife but that this relationship was not
14 good for my marriage and it wasn't good for either
15 one of us. It wasn't good for Marilyn. Not only --

16 Q You were not separated from your wife, were you?

17 A No.

18 Q You never did separate from your wife?

19 A Never.

20 Q Now, did you ever attend a Thanksgiving party at
21 Marilyn's house at all?

22 A No.

23 Q Do you have any evidence that Marilyn Figueroa moved
24 a block away from you in order to be close to you?

25 A No. Her sister lived a block away from me. I mean

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I assume that the times that she lived there, as I understand it, she lived there before she lived in the house on 19th Street.

Q So you don't contend that she moved in there in order to be close to you?

A Well, it's possible, but I don't feel that way, no.

Q Well, did there come a time that Marilyn moved out of there further away from where you live?

A Well, she lived with her sister before she lived on 19th and 19th is, what, seven blocks away. And then she lived in Fardale which is a couple miles away.

Q But you don't have any evidence that she was living with the sister just in order to be close to you?

A I don't, no.

Q Now, while Marilyn Figueroa was still working for the City, do you recall any position that she was offered that she did not accept?

A Yeah, the block grant director job.

Q Who offered that position to Ms. Figueroa?

A I think both Christofferson and Soika.

Q When did Mr. Christofferson offer the position to Ms. Figueroa?

A I'm not sure exactly, but it would have been while he was chief of staff.

Q And this would have been the grant, block grant

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1 director?

2 A Correct. The position now held by Juanita Hawkins.

3 Q And to your knowledge, how was this position offered

4 to Marilyn Figueroa?

5 A As a, that she would do a good job at it.

6 Q Did you ever offer that position to

7 Marilyn Figueroa?

8 A I don't know that I ever personally did, but I think

9 I might have encouraged her to take it.

10 Q You believe that she would have qualified for that

11 position?

12 A Yes.

13 Q Do you know if that offer was made in writing?

14 A I don't know whether it was made in writing or not.

15 I'm sure it was made.

16 Q When did you learn that Mr. Christofferson had

17 offered her a position as a block grant director?

18 A Oh, probably when it happened.

19 Q Which was?

20 A I don't know the exact date. It would have been

21 before he left the Mayor's office, so probably back

22 in '97 or '98, sometime in there. He may have

23 offered it to her twice. My memory which I -- I'm

24 giving you my impression now. I'm not absolutely

25 certain, but I think he might have offered her the

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1 job twice.

2 Q Any other position that you recall that was offered

3 to Marilyn Figueroa while she was still an employee

4 for the City?

5 A Yes. I believe she was offered the position of

6 director of Hope House. And I know that because

7 when Marilyn and I were visiting Hope House,

8 Sherrie Kay who was at that time the director but

9 leaving, said that she wanted Marilyn to take the

10 job.

11 Q And when was that?

12 A Whenever Sherrie Kay left.

13 Q Which is what year?

14 A My guess would be '97 maybe, '98.

15 Q And who, if anyone, offered that position to

16 Marilyn?

17 A Sherrie Kay.

18 Q And who was she?

19 A The director of Hope House. Her board would have

20 had to approve, you know, it would have been a

21 recommendation from her.

22 Q Marilyn Figueroa requested reclassification of her

23 position in 1999; is that correct?

24 A I don't know.

25 Q Did there come a time when a person of, by the last

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1 name of Geraghty got a position as a staff assistant

2 senior?

3 A Yes.

4 Q Did you appoint Ms. Geraghty to that position?

5 A Indirectly, yes, on Soika's recommendation.

6 Q Do you recall whether or not Marilyn Figueroa was

7 considered for that position?

8 A I know that Mike talked to her about whether or not

9 she would be, because she had been so concerned

10 about reclasses in the past, whether she would be

11 upset if Geraghty got the position. And Mike said

12 that Marilyn said, well, if that's what you want to

13 do, fine.

14 I briefly mentioned it to Marilyn is it going

15 to bother you if Geraghty gets it, and she said

16 don't worry about it. It's not something I want to

17 worry about.

18 Q When did you discuss with Marilyn this position?

19 A Sometime probably before or after Thanksgiving.

20 Q That position would have paid an additional \$10,000

21 in salary; is that correct?

22 A I'll take your word on that. I have no reason to

23 contradict you.

24 Q Do you believe that Marilyn would have qualified for

25 that position if she would have applied for it?

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1 A Well, from a technical standpoint anybody on the
2 staff qualified for it. It was not any
3 particular --
4 Q Including Marilyn Figueroa?
5 A Yeah. There's not a requirement of a certain
6 educational level or anything like that. It's a
7 policy position, an unclassified appointment.
8 Q What were the specific requirements for that
9 position?
10 A Well, there really aren't.
11 Q There are no requirements for that position?
12 A Any more than there are for the governor's staff or
13 the president's staff. If you're talking about a
14 civil service position or health department, for
15 example, where you have to have a physician or other
16 licensed health professional to have the health
17 department, there are no requirements like that, no
18 occupational licensing requirements. Even a lawyer
19 could have a job. I'm sorry.
20 Q That's all right. It only takes three years to get
21 a law degree. So you only need one more.
22 So did Ms. Geraghty work for the City of
23 Milwaukee before she was appointed to the staff
24 assistant's position?
25 A No, she worked at Marquette University.

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1 with a lesser salary, we wouldn't have been looking
2 at that.
3 Q Did any -
4 A I wasn't --
5 Q -- of your administrators ever recommend
6 Marilyn Figueroa for that position?
7 A Well, not specifically, no. But I do think, you
8 know, there was no reason why she couldn't be
9 qualified or considered for the position, but it's
10 not a hierarchy where, you know, people -- there's
11 like slots where only certain people are qualified.
12 It was a question of bringing somebody into City
13 government. Patricia Geraghty who was in a fairly
14 high paying position at Marquette, the only way you
15 could get her in was to get the reclass.
16 Q How did the staff assistant senior position was
17 developed? At what point was that position
18 developed?
19 A I don't know. I mean if I had my way, there
20 wouldn't be any real distinction. I would have the
21 situation as Council has where they basically have a
22 salary is assigned to each alderman and then they
23 divide it up any way they want and you wouldn't be
24 in the position of having classifications and all
25 that.

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1 Q Did you know Ms. Geraghty before she was appointed
2 to the position?
3 A I knew her but not very well. I knew that
4 Father Wild felt that she was really highly
5 qualified. And although he said that she was
6 somebody that is really good, I knew that he wasn't
7 real happy that she was leaving Marquette. She's
8 back at Marquette now.
9 Q Did anyone show any interest for that position
10 before Ms. Geraghty was appointed to the position?
11 A Well, basically Mike Soika had known
12 Patricia Geraghty and really valued her and wanted
13 to bring her into the City government. And the
14 only -- I'm sorry if you want to ask --
15 Q I just want to make sure that you understand my
16 question. Did anyone from the staff show any
17 interest in that position?
18 A Not that I know of. I don't think they necessarily
19 knew that -- I mean it wasn't a question of a
20 position being vacant and available. It was a
21 question of Soika trying to recruit somebody he
22 really wanted to come into the office,
23 Patricia Geraghty. If Patricia Geraghty had been
24 working at a place where she was making less money
25 than she was making at Marquette and was satisfied

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1 Q Well, do you know who suggested that the, that that
2 position be reclassified into a senior position?
3 A No, but I'm assuming it probably was Soika. He was
4 trying to recruit Patricia Geraghty.
5 Q What about Mr. Jim Rowen? Did he ever suggest that
6 this position be reclassified into a senior
7 position?
8 A He may have been interested in reclassifying Marilyn
9 because she wanted a reclass. I'd say it was pretty
10 much in the nature of, you know, Soika wanted to
11 bring Geraghty in and did Marilyn want to wait to
12 pursue her classification or was she going to be
13 upset if Patricia Geraghty got it. And the
14 impression that I had was that she was disappointed
15 but that she understood that to get Geraghty in that
16 she'd have to wait on that.
17 Q The position that Mr. Rowen wanted to reclassify for
18 Marilyn would have been the senior position;
19 correct?
20 A I don't know. But I have no reason to contradict
21 you. I mean I basically --
22 Q That was the only position that was reclassified;
23 true?
24 A I don't know. Reclassification is not an area of
25 great interest to me. I mean let me just, if you

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1 can indulge me for just a second. I don't think
2 that the positions in the Mayor's office should be
3 divided up into classifications. The governor's
4 office, for example, doesn't have to deal with that.
5 They just have a chief of staff and then a big
6 staff, and they allocate the salaries and the duties
7 according to what you need to operate an executive
8 office.

9 So these classifications to me are a relic
10 that really doesn't have any useful purpose. And
11 some day hopefully the City of Milwaukee will get
12 rid of them and do like they do for the Council
13 where they just hire people and you assign them to
14 the jobs you think they ought to have.

15 Q Okay. Are you finished?

16 A I am. Thank you for indulging me.

17 Q But in your office for 1999 there was only one
18 senior position; correct?

19 A I have no reason to disagree with you.

20 Q And that was a position that was given to
21 Ms. Geraghty; correct?

22 A Correct.

23 Q And when Mr. Rowen was interested in reclassifying
24 Marilyn, he was interested in reclassifying her into
25 the senior position; is that your understanding?

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1 MR. TOKUS: Objection, objection.

2 A I don't know.

3 MR. TOKUS: Hold on now.

4 THE WITNESS: Sorry.

5 MR. TOKUS: My objection is the
6 manner in which you're characterizing this
7 question in terms of the existence of the
8 senior position. You're acting as if the
9 senior position existed all along.

10 MR. ARELLANO: Mr. Tokus, what's
11 your objection?

12 MR. TOKUS: My objection is to the
13 form of the question in which you're mixing
14 things.

15 MR. ARELLANO: Thank you, thank
16 you.

17 Q When you learned that Mr. Rowen wanted to reclassify
18 Marilyn's position, what was your understanding as
19 far as Marilyn's reclassification, what was your
20 understanding he was trying to do with that
21 position, reclassify her into what?

22 A I mean obviously she wanted to make more money or
23 have, you know, be promoted. Everybody likes to be
24 promoted. I don't -- I mean to me words like senior
25 position versus junior position, they don't mean

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1 anything to me. Everybody is a staff assistant. If
2 there's any hierarchy in my mind, it's the chief of
3 staff and then the rest of the staff.

4 Q But you agree with me, Mayor, so we can leave this
5 alone, that in 1999 only one position was
6 reclassified into a senior position; correct?

7 A I have no reason to disagree with you. I would have
8 to check further to know that for certain.

9 Q To your knowledge, did Marilyn Figueroa's
10 position -- was her position ever reclassified
11 before she left?

12 A I don't know. We have less positions now, so it may
13 not even exist.

14 MR. TOKUS: Hold on. There's no
15 question pending. Hold on.

16 THE WITNESS: Okay, sorry.

17 MR. TOKUS: Wait until he asks the
18 question and don't interrupt him.

19 THE WITNESS: Sorry.

20 Q After Marilyn, after you learned that Marilyn
21 intended to file a discrimination complaint, did you
22 participate in any meetings where Mr. Soika,
23 Mr. Christofferson and your wife were present?

24 A Yeah. At some point I'm sure we --

25 Q How many meetings do you recall took place in order

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1 to deal with Marilyn Figueroa's situation after she
2 left on January 4, 2000?

3 A I don't know.

4 Q Number-wise 10, 20?

5 A I wouldn't think 10, no. More --

6 Q More than 10?

7 A No, much less than 10.

8 Q How many?

9 A I mean I don't know whether -- what period of time
10 are you talking about?

11 Q Let's talk about January. How many times -- were
12 there any meetings in January?

13 A Maybe none in January.

14 Q What about February?

15 A And I don't know that it would just be to deal
16 with -- what aspect of Marilyn Figueroa are you
17 talking about?

18 Q Her potential discrimination complaint.

19 A There may have been some meetings, you know, later
20 in February.

21 Q Who was present at those meetings?

22 A Well, they would have been meetings with -- I mean
23 normally Susan and myself would meet with our
24 attorney, which that's privileged so I don't want to
25 get into that.

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1 Q Your re-election campaign I believe ended in what,
2 April 4th?
3 A April 5th I think.
4 Q Before April 4th did anyone other than
5 Christofferson and Soika, your wife and your
6 attorney, did any of your political supporters ever
7 question the rumors about your relationship with
8 Marilyn Figueroa?
9 A Not that I remember. I certainly didn't bring it
10 up.
11 Q Did you ever deny to anyone any allegations that you
12 and Marilyn Figueroa had engaged in a sexual
13 relationship before December of the year 2000?
14 A No. I think I changed the subject a few times, but
15 I don't think I ever directly denied it.
16 Q Do you recall discussing with Barb Candy anything
17 related to your relationship with Marilyn Figueroa
18 before December 2000?
19 MR. PINES: Discussion before
20 December 2000 or the relationship before
21 December 2000?
22 Q Right. I'm talking about your relationship with
23 Marilyn Figueroa, with Barb Candy before
24 December 2000.
25 A I don't remember discussing it with her. She may

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1 exact words, but something to the effect of, well, I
2 didn't think much of that article today and, you
3 know, trying to get me to then talk about it, and I
4 would change the subject.
5 Q Before April 4th of the year 2000, did she ask you
6 any questions about the alleged rumors regarding
7 your relationship with Marilyn Figueroa?
8 A I don't think she asked me any direct questions.
9 Q Indirect questions?
10 A As I described, you know, looking at the newspaper
11 and making some comment to try to elicit a response,
12 and I just had no interest in sharing it with her.
13 It was not in my interest, my wife's interest or for
14 that matter Marilyn Figueroa's interest for a whole
15 bunch of people to know about this. If Marilyn
16 thought it was in her interest to tell everybody,
17 she could have done it anytime she wanted.
18 Q Well, how many times do you remember Barb Candy
19 inquiring in some indirect fashion about --
20 A Not very often. I'd say two or three.
21 Q Before the final April 4th election?
22 A Yeah. If that. Maybe one or two.
23 Q What about did you ever deny to any reporter that
24 the rumors regarding your alleged relationship with
25 Marilyn Figueroa were false?

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1 have asked about it or hinted around about it and I
2 would have changed the subject because I had no
3 reason in the world to want to talk to her about
4 that.
5 Q Do you know before April 4th of the year 2000, do
6 you know -- did Barb Candy question or at least try
7 to inquire about rumors regarding your relationship
8 with Marilyn Figueroa?
9 A She may have hinted around about it, but I mean
10 there's no way in the world that I wanted the
11 knowledge of the relationship to spread any further
12 than it had.
13 Q What kinds of questions --
14 A Not only that, I also felt that it wasn't
15 necessarily a good thing for me to -- a good thing
16 for Marilyn for me to disclose the relationship.
17 Q What kinds of questions --
18 A She had a right to privacy too.
19 Q What kinds of questions did Ms. Candy ask that would
20 lead you to believe she was inquiring about your
21 relationship with Marilyn Figueroa?
22 A I don't know if I can speak in as obtusive language
23 as she might have used.
24 Q Tell me the gist of what she was asking you.
25 A Maybe something like -- she wouldn't have used these

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1 A No. But I did refuse to talk about it.
2 Q Do you recall whether or not a reporter by the name
3 of Mary Nohl questioned you about --
4 A I had an interview with her, and my memory of it is
5 that I refused to talk about it.
6 Q Did she ask you specifically about those rumors?
7 A I don't remember her exact question, but it was one
8 that I didn't want to answer.
9 Q Was that before the April 4th election?
10 A Yes.
11 Q In December of 1999 when Marilyn ended the
12 relationship, did you notice any type of depressive
13 mood, any type of sadness in her demeanor?
14 A What period are you talking about now?
15 Q Right after the relationship ended.
16 A Well, let me just go through my impressions quickly.
17 At the Channel 58 I thought she was well prepared
18 for the television program. She gave me material
19 that I could use. I don't speak Spanish fluently,
20 but I try occasionally to do it and try to have my
21 pronunciation right. So she had certain phrases,
22 and I used some of them.
23 Then -- so I thought that was, you know, just
24 professional, performing her job. When I saw her in
25 the, at St. Luke's after she had had her car

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1 accident, she seemed, you know, pretty down. You
2 know, how are you doing? I'm okay. She may have
3 been on a pain medication or something like that. I
4 don't know. I was just there for a few minutes and
5 left.

6 Other than that, the only other time I talked
7 to her was on the way out the door and I asked her
8 how her neck was doing. She didn't seem to be in a,
9 you know, happy mood but not enough to make me think
10 that there was -- that she was leaving her job.

11 Q Do you know, during this period of time do you know
12 how much time Marilyn was working on the political
13 campaign of your re-election?

14 A My assumption was half.

15 Q And --

16 A That's what I understood.

17 Q And how was she supposed to record her time? Was
18 she entitled to comp time whenever --

19 A No. She had to work, would only be paid for
20 half-time at the City, and then she was free to work
21 on the campaign the other half-time.

22 Q When people took time from work to work on the
23 campaign, were they entitled to comp time?

24 A No, not that I know of.

25 Q Ever?

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1 A It could be that somebody might have done it. It
2 doesn't sound right but, you know, it's possible it
3 could happen. I don't know that it happened.

4 Q Do you know who kept track of Marilyn's time when
5 she was working for your political campaign?

6 A From the political side of the campaign?

7 Q Right.

8 A Or from my office?

9 Q From the political side of the campaign.

10 A Bill Christofferson or Michelle McGrorty.

11 Q Was Marilyn getting paid from the political
12 campaign?

13 A I assume she was.

14 Q In 1999?

15 A I think starting in December or November, maybe as
16 early as November 1st. I don't know.

17 Q How did it happen that she was assigned to work
18 part-time in the political campaign?

19 A Well, she's a good political organizer.

20 Q I understand that. But who assigned her to work
21 half-time?

22 A Bill Christofferson -- you mean from the campaign
23 side?

24 Q Correct.

25 A Christofferson.

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1 Q And so she was getting paid 50 percent from the City
2 and 50 percent from the political campaign; is that
3 your testimony?

4 A I don't know that for sure, but that's my
5 impression.

6 Q So that means she was working what, approximately
7 half-time on the political campaign and half-time in
8 your office?

9 A That's my understanding. It may have been different
10 than that, but that's my understanding.

11 Q And where did you learn this information that she
12 was working half-time for the political campaign?

13 A I'm not sure, but probably from Christofferson or
14 maybe from her.

15 Q Was there ever any type of work done out of your
16 office pertaining to the political campaign?

17 A No. I certainly hope not. It's not something
18 you're supposed to do.

19 Q Did Mr. Christofferson work out of your office from
20 time to time in 1999 on the political campaign?

21 A Not that I know of.

22 Q Mr. Christofferson was your chief of staff sometime
23 previously; correct?

24 A Yes.

25 Q What years was he the chief of staff?

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1 A Let's see. It would have been '97, '98 I believe.
2 He left in '98. Rowen came in then.

3 Q And how long was Mr. Rowen the chief of staff?

4 A Well, you can look it up, but I think my guess is
5 about a year and a half.

6 Q And I want to ask you this one last question,
7 Mr. Norquist.

8 A Okay.

9 Q Do you recall whether or not Mr. Rowen recommended
10 Marilyn Figueroa for the assistant to the Mayor's
11 senior position?

12 A No, I don't.

13 MR. ARELLANO: We're going to --
14 it's 12:10. We will reconvene tomorrow with
15 the continuation of Mr. Norquist. We can go
16 off the record now.

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19
20 (adjourning at 12:13 P.M.)
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1 STATE OF WISCONSIN)
2 COUNTY OF DANE) ss.

3 I, TAUNIA NORTHOUSE, a Registered Diplomate Reporter
4 and Notary Public in and for the State of Wisconsin, do
5 hereby certify that the foregoing deposition was taken
6 before me at the offices of Murphy, Gillick, Wicht &
7 Prachthauser, Attorneys at Law, 330 East Kilbourn
8 Avenue, City of Milwaukee, County of Milwaukee, and
9 State of Wisconsin, on the 5th day of March 2002, that
10 it was taken at the request of the Complainant, upon
11 verbal interrogatories; that it was taken in shorthand
12 by me, a competent court reporter and disinterested
13 person, approved by all parties in interest and
14 thereafter converted to typewriting using computer-aided
15 transcription; that said deposition is a true record of
16 the deponent's testimony; that the appearances were as
17 shown on Page 3 of the deposition; that the deposition
18 was taken pursuant to notice and subpoena duces tecum;
19 that said JOHN O. NORQUIST before examination was sworn
20 by me to testify the truth, the whole truth, and nothing
21 but the truth relative to said cause.

22 Dated March 16, 2002.

23
24 _____
25 Registered Diplomate Reporter
Notary Public, State of Wisconsin

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