

BEFORE THE HEARING SUBCOMMITTEE  
OF THE INTERIM LEGISLATIVE ETHICS COMMITTEE

In re: Representative Carl  
Trujillo,

Respondent.

DEPOSITION OF CARL TRUJILLO  
November 8, 2018  
9:01 a.m.  
201 Third Street, Northwest, Suite 1630  
Albuquerque, New Mexico

PURSUANT TO THE NEW MEXICO RULES OF CIVIL  
PROCEDURE, this deposition was:

TAKEN BY: MR. THOMAS M. HNASKO  
Special Counsel

REPORTED BY: Peggy Jo Gonzales, RMR, CCR #145  
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(1208N-PJ)

## A P P E A R A N C E S

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CARL TRUJILLO,

after having been first duly sworn under oath,  
was questioned and testified as follows:

## EXAMINATION

BY MR. HNASKO:

**Q. Would you state your name for the record, please.**

A. Carl, C-A-R-L, last name Trujillo.

**Q. And where do you live, Mr. Trujillo?**

A. I live at 1 Jerry Hatchet Lane, Nambe, New Mexico.

**Q. And have you had your deposition taken before?**

A. Have I had a deposition?

**Q. Yes, sir.**

A. No.

**Q. All right, let me go over some of the ground rules. First of all, the court reporter is going to be taking down my questions and your answers, so it's very important that we don't speak over one another, and that she gets the opportunity to transcribe my questions and then transcribe your full answer, okay.**

A. Fair enough.

**Q. Secondly, if you don't understand anything**

**I've asked and I can clean it up in any way for you, please let me know if my question is unclear and I'll do my best to accommodate that, okay.**

A. Okay.

**Q. Now, you just took the oath. You understand that you are now giving answers under the penalty of perjury?**

A. Yes.

**Q. All right. And you know what that can entail, particularly with scrutiny for a public official?**

A. I -- I don't, but you can tell me.

**Q. Do you have any idea -- you understand the necessity to answer my questions truthfully?**

A. Yes, absolutely, yes.

**Q. And you're going to answer my questions unless, of course, your counsel here, Mr. -- Travis, Mr. Jackson, tells you not to answer, correct?**

A. Correct.

**Q. All right. So where do you work, Mr. Trujillo?**

A. I work at Los Alamos National Labs.

**Q. And what's your position?**

A. I'm a senior researcher there at the lab, it's called a research technologist III is what the



<p style="text-align: right;">Page 6</p> <p>1 title is.</p> <p>2 <b>Q. I'm sorry, research technologist III?</b></p> <p>3 A. III, yes. There's different designations</p> <p>4 there.</p> <p>5 <b>Q. Is it a Roman numeral III or --</b></p> <p>6 A. Yes, Roman numeral III, correct.</p> <p>7 <b>Q. And what are the duties of a research</b></p> <p>8 <b>technologist III?</b></p> <p>9 A. I work in the fundamental science of</p> <p>10 materials, and it's to understand how materials</p> <p>11 behave under shock wave conditions, so it's basically</p> <p>12 doing fundamental science in -- in -- in an</p> <p>13 experimental environment.</p> <p>14 <b>Q. And is that -- is that in the physical</b></p> <p>15 <b>sciences or how -- how do you -- how do you conduct</b></p> <p>16 <b>experiments in that regard?</b></p> <p>17 A. I have many different testing platforms</p> <p>18 that I've designed over the course of 34 years, 33.5</p> <p>19 years, and because shock wave physics or -- the</p> <p>20 equipment has been designed and built there, and so</p> <p>21 it's, I would call it, a fundamental science, physics</p> <p>22 science, fundamental.</p> <p>23 <b>Q. And in the scope of your employment, do you</b></p> <p>24 <b>from time to time encounter experiments or other</b></p> <p>25 <b>tasks that have to be confidential or, in other</b></p>	<p style="text-align: right;">Page 8</p> <p>1 A. As I understand it, there is a Q clearance,</p> <p>2 which I've held since about 19 years old, and I'm now</p> <p>3 52. Under a Q clearance, there are different sigma</p> <p>4 levels, and those sigma levels are based on a need to</p> <p>5 know.</p> <p>6 <b>Q. What does the term sigma refer to?</b></p> <p>7 A. That would be a DOE or DOD or Office of</p> <p>8 Personnel designation. I don't absolutely know</p> <p>9 what -- what the sigma identifies. I know what it --</p> <p>10 I know that we were always told it's a need to know.</p> <p>11 <b>Q. Is it a signa or sigma?</b></p> <p>12 A. Sigma. Sigma.</p> <p>13 <b>Q. With an M?</b></p> <p>14 A. Yeah.</p> <p>15 <b>Q. Okay. And from time to time do you have to</b></p> <p>16 <b>renew your security clearance --</b></p> <p>17 A. Yes.</p> <p>18 <b>Q. -- credentials?</b></p> <p>19 A. Yes, sir.</p> <p>20 <b>Q. And what is that process?</b></p> <p>21 A. That process is not run by me or the lab,</p> <p>22 it's run by the -- someone in the federal government,</p> <p>23 Office of Personnel -- I don't know. I don't know</p> <p>24 exactly who, but what I do know is it's every five</p> <p>25 years you have to submit where you've been, and --</p>
<p style="text-align: right;">Page 7</p> <p>1 <b>words, cannot be disclosed to the public?</b></p> <p>2 A. So I do have security clearance. Most of</p> <p>3 the work -- most of the work that I do is I don't sit</p> <p>4 behind a fence, a Q clear fence, so almost all work</p> <p>5 that I do is open public literature.</p> <p>6 <b>Q. Okay. Can you describe to me some of the</b></p> <p>7 <b>type of experiments you perform that are open to the</b></p> <p>8 <b>public?</b></p> <p>9 A. Sure. Many of those you can find in open</p> <p>10 literature just through a Google search on the papers</p> <p>11 that I've published, but it can be on copper,</p> <p>12 understanding the grain boundaries of copper,</p> <p>13 understanding how steels behave under load.</p> <p>14 <b>Q. All right. And what is the application of</b></p> <p>15 <b>those sorts of experiments in the practical world?</b></p> <p>16 A. In the practical world, most of those are</p> <p>17 for better understanding materials in aerospace --</p> <p>18 <b>Q. Okay.</b></p> <p>19 A. -- automobile industry. Those are some of</p> <p>20 the major applications.</p> <p>21 <b>Q. You mentioned that you do have a security</b></p> <p>22 <b>clearance; is that correct?</b></p> <p>23 A. That is correct.</p> <p>24 <b>Q. Are there different types of security</b></p> <p>25 <b>clearance at LANL?</b></p>	<p style="text-align: right;">Page 9</p> <p>1 and people you know, and they go through a very</p> <p>2 lengthy process of interviewing all of those -- those</p> <p>3 people, and then, furthermore, they ask those people</p> <p>4 of other people you may have interacted with. So</p> <p>5 all -- my job is just to submit the paperwork</p> <p>6 every -- every five years, and then they decide</p> <p>7 through their own investigation whether they're going</p> <p>8 to continue your Q clearance.</p> <p>9 <b>Q. Okay. What's your educational background?</b></p> <p>10 A. So I'm -- my educational background is in</p> <p>11 mechanical engineering. I went to UNM-LA for</p> <p>12 multiple years, and I never -- so I have, I don't</p> <p>13 know, maybe eight -- seven years of UNM-LA, or I</p> <p>14 don't know exactly how much, but I do not have a</p> <p>15 bachelor's degree.</p> <p>16 <b>Q. So UN -- UNM-LA, that's the Los Alamos</b></p> <p>17 <b>branch --</b></p> <p>18 A. Correct.</p> <p>19 <b>Q. -- of the UNM campus?</b></p> <p>20 A. Correct.</p> <p>21 <b>Q. And, again, we're not able to speak over</b></p> <p>22 <b>one another. I know it's tempting to do that, so</b></p> <p>23 <b>don't worry, we all make that mistake.</b></p> <p>24 A. So to answer your question --</p> <p>25 <b>Q. Yes.</b></p>

<p style="text-align: right;">Page 10</p> <p>1 A. -- my educational background is high school 2 and -- and, I guess, part time or some limited time 3 at UNM-LA. 4 <b>Q. And how far did you get in pursuing a 5 degree at UNM-LA?</b> 6 A. Are you -- how do you -- are you asking me 7 to -- 8 <b>Q. Credit --</b> 9 A. -- quantify that? 10 <b>Q. Yeah, credit hours or some --</b> 11 A. Oh, I don't know. I think -- I don't 12 recall. I'd have to go back and look. 13 <b>Q. All right. Were you seeking a mechanical 14 engineering degree?</b> 15 A. I was seeking an engineering degree. 16 <b>Q. Okay. And during that period, you 17 mentioned -- I think you mentioned you got your 18 Q clearance when you were 19. Is that correct?</b> 19 A. On or about. I don't -- I don't remember. 20 I know I was -- 21 <b>Q. Approximately?</b> 22 A. Approximately, 19, 20. I don't know. 23 <b>Q. So you've been working up there a long 24 time?</b> 25 A. I've been working up there since July of</p>	<p style="text-align: right;">Page 12</p> <p>1 A. It's Tri-Son, T-R-I, Son Development. 2 <b>Q. S-O-N?</b> 3 A. S-O-N, yeah. 4 <b>Q. And is that business still --</b> 5 A. Yes. 6 <b>Q. -- in operation? Who runs that business 7 today?</b> 8 A. Who runs the business is my father and I. 9 <b>Q. And you?</b> 10 A. Yes. 11 <b>Q. So you're able to have that business in 12 addition to your work as a research technician III at 13 Los Alamos?</b> 14 A. Correct. At the lab they make you file a 15 form for any outside activity, and I've kept an 16 outside activity form compliant to their rules. 17 <b>Q. All right. And is it a general contractor?</b> 18 A. It's a general contractor, yes. 19 <b>Q. And who holds the GC license?</b> 20 A. I do. 21 <b>Q. And when did you obtain that license?</b> 22 A. I don't recall. I know it's more than a 23 decade ago, or -- or longer. 24 <b>Q. What -- what types of licenses do you have 25 in the construction business?</b></p>
<p style="text-align: right;">Page 11</p> <p>1 1985, and so we are basically 33 years later, 33.5 2 years later. 3 <b>Q. And I think you mentioned you went to 4 UNM-LA for approximately seven years?</b> 5 A. I don't recall. I'd have to go back and 6 look at my transcript. 7 <b>Q. Roughly.</b> 8 A. I'd have to go back and look at my 9 transcript. 10 <b>Q. You were a part-time student the whole 11 time, I take it?</b> 12 A. Because I was working full-time, yes. 13 <b>Q. All right. And what other jobs have you 14 had during this period?</b> 15 A. I have had another job of running a 16 business. 17 <b>Q. What -- what business?</b> 18 A. Two different -- well, one business when I 19 was younger was a screen printing embroidery 20 business, but that's no longer in business, and, 21 also, running a homebuilding business. 22 <b>Q. Tell me about the homebuilding business. 23 Was it your company?</b> 24 A. Well, it was mine and my father's. 25 <b>Q. And what was the name of the company?</b></p>	<p style="text-align: right;">Page 13</p> <p>1 A. GB-98. 2 <b>Q. GB-98. Any others?</b> 3 A. No. 4 <b>Q. Okay. And what is the primary activity of 5 Tri-Son Construction?</b> 6 A. Residential building. 7 <b>Q. Is that new, or remodel, or both?</b> 8 A. Mainly new. 9 <b>Q. Let's go back to your job as a research 10 technical -- technician, rather, III. Is there a 11 research technician II and I, as well?</b> 12 A. Well, there's -- no, there's technician 13 levels and then there's technologist levels, and so 14 there's technologist I through III. 15 <b>Q. And you're a technologist?</b> 16 A. Technologist -- 17 <b>Q. I apologize.</b> 18 A. -- I through III. 19 <b>Q. Okay. And -- and what is the difference 20 between the three designations of technologists?</b> 21 A. I -- I can only give you some general 22 overview. I -- 23 <b>Q. That's okay.</b> 24 A. -- I don't know, but I know that -- I guess 25 I really couldn't give you a good description. I</p>



1 know a description of mine is you have to be  
2 determined as -- as extremely knowledgeable in your  
3 field, publish if you can, design new test platforms,  
4 create novel experiments, that sort of things.

5 **Q. So I take it III is higher than II, which**  
6 **is --**

7 A. Yes.

8 **Q. -- higher than I?**

9 A. Yes, yes.

10 **Q. All right. And were you at one time a**  
11 **research technologist I?**

12 A. Yes, sir.

13 **Q. And you advanced to II and then now III?**

14 A. Well, I was -- over the course of years,  
15 the -- the designations have changed, and so I just  
16 started at the bottom and have worked up.

17 **Q. Okay. Is there a higher position than**  
18 **research technologist III in the technologist field?**

19 A. Not currently, no.

20 **Q. So you're at the top of that --**

21 A. Yes.

22 **Q. -- that research field?**

23 (A discussion was held off the record.)

24 **Q. (By Mr. Hnasko) What's your schedule at the**  
25 **lab for working? In other words, tell me about is it**

1 **a full-time job? Do you have to be there at**  
2 **particular hours or do you have some flexibility in**  
3 **that regard?**

4 A. I follow the lab's policy.

5 **Q. Which is what?**

6 A. I don't -- I can't give it to you verbatim.

7 **Q. I don't need it verbatim, just your**  
8 **understanding of it is fine.**

9 A. Understanding of it is you have a work  
10 schedule, and it does have -- let me find the right  
11 word.

12 **Q. I'm trying to understand how you do your**  
13 **construction work and the lab work concurrently.**

14 A. Well, I can answer that question if you'd  
15 like. I have my father that is my so-called  
16 construction manager, and so he is at the job site  
17 all the time. So it's my father that overviews all  
18 the projects.

19 **Q. Okay. And then back to the original**  
20 **question about the lab's policy as to your hours and**  
21 **times of work, what's your understanding of that?**

22 A. My understanding is that you -- you have a  
23 work schedule of putting in -- they have what they  
24 call 9/80s, so you work 44 hours one week and 36  
25 hours the other week, and so they're pretty flexible

1 of how you put those hours in.

2 **Q. And how do you accommodate your time in the**  
3 **legislature with a 44-hour week one week and a 36**  
4 **some other week?**

5 A. So over the course of -- the lab, during  
6 the session, has a very generous policy that's been  
7 in place for decades that allows -- and I can't give  
8 specific hours, but I think it's during a 40 --  
9 60-day session -- somewhere in the neighborhood of  
10 200-and-some hours of leave that you're paid for.  
11 And so I would take advantage of that leave, and the  
12 rest of the time would be vacation and leave without  
13 pay. I took many days of leave without pay.

14 **Q. Okay. 200 hours, roughly a couple weeks,**  
15 **is that what they give you?**

16 A. Excuse me?

17 **Q. The 200 hours equates to, roughly, a couple**  
18 **of weeks of paid leave?**

19 A. So 40 hours in a week.

20 **Q. So four weeks?**

21 A. I think that the -- I would have to look at  
22 the lab policy. It's -- it doesn't -- it's not for  
23 the entire time that you're there, but it's for more  
24 than half the time you're there, and so I would have  
25 to look at the policy to give you the exact numbers.

1 **Q. Okay. And where do you live?**

2 A. Nambe, New Mexico. I think I -- 1 Jerry  
3 Hatchet Lane, Nambe, New Mexico.

4 **Q. During the legislative sessions, did you**  
5 **have a particular -- particular practice of staying**  
6 **in Santa Fe or returning to Nambe --**

7 A. Returning.

8 **Q. -- on a daily basis?**

9 A. Returning to Nambe.

10 **Q. And were there instances when you did not**  
11 **return to Nambe during your tenure as a legislator?**

12 A. Very infrequently.

13 **Q. You first became a legislator in 2013?**

14 A. Correct.

15 **Q. How did you decide to run for office?**

16 A. I was always involved in community outreach  
17 and activities, coaching youth sports for multiple  
18 years. I was involved in the community and just felt  
19 the next step of civic duty was to run for office.

20 **Q. Okay. Counting the last session, you've**  
21 **been in the legislature for five years?**

22 A. Three terms, two -- two terms, so six  
23 years.

24 **Q. Six years. During that six-year period,**  
25 **while the legislature was in session, how often did**

1 you stay in Santa Fe?

2 A. I'd have to go back and look at notes, but  
3 not very often.

4 **Q. Did you keep a calendar of your events  
5 and -- during this period?**

6 A. No.

7 **Q. When you say "not very often," could you  
8 give me an estimate? Did any -- any session require  
9 you to be down here more frequently than other  
10 sessions, and if so let's break them down and see if  
11 you can give me an estimate as to how often you  
12 stayed in Santa Fe during each of the sessions?**

13 A. So the --

14 **Q. Maybe start with 2013.**

15 A. Oh, I -- I couldn't recall how many times I  
16 stayed. I would say, very infrequently. And if  
17 there was any time that was stayed, it was at the end  
18 of the session when we would end at very early hours  
19 of the morning --

20 **Q. Um-hum.**

21 A. -- and have to be back by 8:00 would be the  
22 time that -- those would be the nights that I would  
23 stay.

24 **Q. In 2014?**

25 A. I couldn't recall.

1 A. Correct.

2 **Q. All right. Was it your practice to attend  
3 political -- or functions, social functions, during  
4 the evening before returning home?**

5 A. On occasion. There's many political  
6 functions. I can tell you that I didn't go to many  
7 of them.

8 **Q. We're talking about -- let's be clear,  
9 we're talking about dinners, and parties, and other  
10 such events.**

11 A. So the -- please repeat the question.

12 **Q. When I say "social functions," I'm  
13 referring to dinners, perhaps parties, other events  
14 that may be sponsored by lobbyists or others with an  
15 interest in the legislative session.**

16 A. So if your question is did I go to any of  
17 them, I went to some of them, yes.

18 **Q. So you're familiar with the identities of  
19 the legislators on the -- on the hearing subcommittee  
20 to the interim ethics committee?**

21 A. Am I?

22 **Q. You know -- you know the identities of the  
23 people?**

24 A. Of the current --

25 **Q. Yes.**

1 **Q. Same answer?**

2 A. Same answer.

3 **Q. And 2015?**

4 A. I think my -- same answer. I can't recall  
5 how many nights I stayed; it wasn't very many.

6 **Q. 2016?**

7 A. Same answer.

8 **Q. 2017?**

9 A. Same.

10 **Q. And the last session, 2018?**

11 A. Same.

12 **Q. When you did stay in Santa Fe, did you have  
13 a particular place you preferred or was it --**

14 A. No, because I wasn't -- because I didn't  
15 know. Depending on how late we would get out, I  
16 would literally just call around to see what was the  
17 cheapest rate.

18 **Q. At a hotel?**

19 A. Yes.

20 **Q. Other than those infrequent stay-overs in  
21 Santa Fe, your general practice was to return home to  
22 Nambe?**

23 A. Correct.

24 **Q. And then return again in the morning if  
25 that was necessary.**

1 A. -- eight members?

2 **Q. Yes, sir.**

3 A. Yes.

4 **Q. All right. And it's Ms. Fajardo; is that  
5 correct?**

6 A. Correct.

7 **Q. Representative Johnson, D. Wonda Johnson?**

8 A. Correct.

9 **Q. Representative Brown?**

10 A. Correct.

11 **Q. Representative Ferrary?**

12 A. Correct.

13 **Q. Representative Martinez?**

14 A. Correct.

15 **Q. Representative Armstrong?**

16 MR. JACKSON: Are you asking him if he  
17 knows them or if he --

18 MR. HNASKO: No, I just want to make sure  
19 he knows the people that are on the --

20 A. If they're a member. If I know that  
21 they're a member.

22 MR. HNASKO: -- that are members of this  
23 particular subcommittee, yes, sir.

24 **Q. (By Mr. Hnasko) Representative Armstrong?**

25 A. So let me make sure I clarify this. You're



1 asking me if I know if they're a member of this  
2 committee?

3 **Q. Yes, if they're -- they're part of this**  
4 **subcommittee, this hearing subcommittee that is**  
5 **overseeing and ultimately going to make**  
6 **determinations in this matter.**

7 A. Yes, I do know that because it's public  
8 record and it's on the legislative website.

9 **Q. And Representative Lewis, you know that he**  
10 **is now a member?**

11 A. Yes.

12 **Q. And is it Representative Sweetser from --**

13 A. It shows that on the website, yes.

14 **Q. All right. And since this last summer when**  
15 **you became aware of this particular investigation,**  
16 **have you had contacts with any of these**  
17 **representatives concerning this hearing or any**  
18 **matters relevant to this hearing?**

19 A. I have not had any -- the -- have I had any  
20 contact with the members?

21 **Q. Yes.**

22 A. The contact that I had with the four  
23 members was I had sent them a text message saying  
24 that I had e-mailed, or mailed, the evidentiary  
25 binder to their address.

1 **Lewis, Sweetser and Johnson. Have you had any**  
2 **contacts with them?**

3 A. Representative Sweetser, when -- when  
4 the -- when your findings and recommendations were  
5 adopted, she called me to tell me she had been  
6 called, that she was now part of this committee.

7 **Q. Okay. When did that call occur?**

8 A. Maybe a day or two after, whenever the  
9 legislative -- I don't recall, but a couple of days,  
10 she just called and said, Carl, I'm part of this  
11 committee now, and I said -- that's it.

12 **Q. You accepted the call?**

13 A. I -- I accepted the call, yes.

14 **Q. All right. And just to be clear, I think I**  
15 **maybe took us down the wrong path, because the**  
16 **investigative subcommittee, correct me if I'm wrong**  
17 **here, was comprised of Representative Fajardo,**  
18 **Ferrary, Martinez and Armstrong; is that correct?**

19 A. I don't recall.

20 **Q. Okay.**

21 A. I mean, you -- you --

22 **Q. I'm asking you --**

23 A. -- you interacted with them.

24 **Q. I'm asking you -- well, I'm asking you what**  
25 **your knowledge is, sir. That's all. If you don't**

1 **Q. And just to be clear, when you're referring**  
2 **to the four members, you're talking about the members**  
3 **who comprised the investigative subcommittee?**

4 A. Correct.

5 **Q. And that would have been Representative**  
6 **Fajardo?**

7 A. Correct.

8 **Q. Representative Brown?**

9 A. Correct.

10 **Q. Representative Martinez?**

11 A. Correct.

12 **Q. Representative Johnson? Or at the time it**  
13 **might have been Representative Gentry.**

14 A. I don't --

15 **Q. Do you recall?**

16 A. I don't recall.

17 **Q. All right. Other than your sending the**  
18 **binders, or the text messages alerting them to your**  
19 **intention to send them an evidentiary binder, have**  
20 **you had any contact with those four members?**

21 A. No.

22 **Q. And how about the other members of the**  
23 **hearing subcommittee, the other four who were not**  
24 **members of the investigative subcommittee, and by**  
25 **that I'm referring to Representative Armstrong,**

1 recall, that's fine.

2 A. I don't recall.

3 **Q. All right. So that was the extent of your**  
4 **conversation with Representative Sweetser?**

5 A. Correct.

6 **Q. And she informed you that she had been**  
7 **appointed to the hearing subcommittee, and your**  
8 **response was what?**

9 A. My response was -- I don't recall. Just --  
10 I don't recall.

11 **Q. Do you recall, generally, the date that the**  
12 **investigative subcommittee adopted the report issued**  
13 **by special counsel?**

14 A. July 27th.

15 **Q. All right. Since July 27, 2018, to the**  
16 **present date, have you had any contact with members**  
17 **of the hearing subcommittee, any of the eight we've**  
18 **identified?**

19 A. No.

20 **Q. All right. Has anyone contacted them on**  
21 **your behalf?**

22 A. Not that I'm aware of.

23 **Q. Have you requested that anyone contact any**  
24 **of the eight legislators sitting on this hearing**  
25 **subcommittee on your behalf?**

1 A. No.

2 **Q. So you've had no contacts whatsoever?**

3 A. Could you please repeat the question?

4 **Q. You've had no contacts whatsoever since**  
 5 **January -- July 25 of 2018 with these -- any of the**  
 6 **eight members of the hearing subcommittee that we've**  
 7 **identified?**

8 A. So it would be July 27th is right?

9 **Q. July 27th.**

10 A. Okay. And so have I contacted any of --  
 11 no.

12 **Q. Have you or anyone on your behalf?**

13 A. Not that I'm aware.

14 **Q. All right.**

15 (Exhibit 1 marked.)

16 **Q. (By Mr. Hnasko) Let me hand you what's**  
 17 **going to be marked as Exhibit 1, and ask you if you**  
 18 **could review and identify this for the record,**  
 19 **please.**

20 A. This is part of the evidence binder that  
 21 was submitted to special counsel, legislative  
 22 council, and the four members of the subcommittee.

23 **Q. All right, well, it's addressed to the four**  
 24 **members of the subcommittee, correct, Representatives**  
 25 **Martinez, Ferrary, Fajardo and Brown?**

1 A. I received a -- the open letter via a  
 2 reporter, and I looked at the title or the name, and  
 3 I had no recollection of Ms. Bonar, and I had to get  
 4 on my computer and look online to identify her.

5 **Q. And when you did so, did that jog your**  
 6 **memory as to who she was?**

7 A. No, I still had to sit back and think  
 8 longer.

9 **Q. Take me through the process, if you would,**  
 10 **please, of how you recalled who Ms. Bonar was given**  
 11 **the statement that you had a difficult time recalling**  
 12 **who she was.**

13 A. I -- as I mentioned, I did not recognize  
 14 the name.

15 **Q. Um-hum.**

16 A. I Google searched her, I found a picture,  
 17 and even at that point I didn't -- it didn't jog my  
 18 memory, and sat there and kept thinking and thinking  
 19 and thinking and finally had some vague recollection.

20 **Q. And what was the vague recollection?**

21 A. Just vague, like if you saw somebody at, I  
 22 don't know, a church or at a restaurant and maybe you  
 23 saw her later on in time, vague like that.

24 **Q. And when you were trying to jog your memory**  
 25 **as to who she was, did you recall your interactions**

1 A. That's correct.

2 **Q. I notice it's undated. Is this your first**  
 3 **submission to them of evidentiary materials that you**  
 4 **referred to earlier?**

5 A. As I recall, yes.

6 **Q. All right. All right, I think that clears**  
 7 **up for us who was on the investigative subcommittee,**  
 8 **Representatives Martinez, Ferrary, Fajardo and Brown?**

9 A. Correct.

10 **Q. All right. Let me direct your attention to**  
 11 **the first full paragraph, and on the fourth line**  
 12 **you're making a reference to the observation that you**  
 13 **had a difficult time recalling who Laura Bonar was or**  
 14 **when you could have interacted with her. Do you see**  
 15 **that reference? It begins on the fourth line down,**  
 16 **the first full paragraph. Fourth line down.**

17 A. I'm -- I'm reading.

18 **Q. Okay.**

19 A. Okay.

20 **Q. All right, you see that reference?**

21 A. Yes.

22 **Q. All right. You mentioned you had a**  
 23 **difficult time recalling, which am I to take it you**  
 24 **did recall who she was after considering the matter**  
 25 **for a while?**

1 **with her?**

2 A. No.

3 **Q. So at the time you wrote this letter, is**  
 4 **it -- is it a fair assessment on my part to say that**  
 5 **you -- you did remember who she was, but it took time**  
 6 **to get to that determination? You did not remember**  
 7 **any interactions with her?**

8 MR. JACKSON: Objection, I don't think  
 9 that's what he testified.

10 MR. HNASKO: I'm just asking. I asked him  
 11 if it's fair.

12 A. No.

13 **Q. (By Mr. Hnasko) Pardon?**

14 A. I think, as stated here, is -- is I  
 15 didn't -- I had to take the time to look on -- look  
 16 online to determine who she was, and I didn't  
 17 recognize her.

18 **Q. Yeah, I understand that part, you were very**  
 19 **clear on that, it took you additional thought process**  
 20 **to remember who she was, but I'm curious about the**  
 21 **second part of your sentence where you indicated you**  
 22 **had a difficult time recalling when you could have**  
 23 **interacted with her, and I'm curious, in your**  
 24 **consideration of the matter and -- and thought**  
 25 **process, did you ultimately remember when you had**



1 interacted with her?  
 2 A. No.  
 3 **Q. Okay, so at the time you wrote this letter,**  
 4 **you did not know of any instances when you had**  
 5 **interacted with her?**  
 6 A. I didn't.  
 7 **Q. Okay. When did you first become aware of**  
 8 **instances in your own mind when you interacted with**  
 9 **Ms. Bonar?**  
 10 MR. JACKSON: Object to form.  
 11 **Q. Well, let's say, whatever the date of this**  
 12 **letter was, it preceded your subsequent submission of**  
 13 **evidence?**  
 14 A. Correct.  
 15 **Q. Am I correct that you knew who Ms. Bonar**  
 16 **was, but you had a difficult time remembering that,**  
 17 **you had to go on Google, look at a picture, and --**  
 18 A. Sure.  
 19 **Q. -- search your memory banks? But at the**  
 20 **time of this letter, could you recall any**  
 21 **interactions with her whatsoever?**  
 22 A. No.  
 23 **Q. So you had zero recollection of -- of an**  
 24 **interaction with Ms. Bonar?**  
 25 A. I didn't recall any interaction with

1 Ms. Bonar.  
 2 **Q. Okay, fair enough, that's what I wanted to**  
 3 **know.**  
 4 **Let me turn your attention to page 2 of**  
 5 **this letter, the top paragraph, and in particular the**  
 6 **second to last sentence. I'm going to quote it for**  
 7 **you, it says "This documentary evidence proves that**  
 8 **the vague allegations made by Ms. Bonar are false,**  
 9 **and that they were politically motivated." Did I**  
 10 **read that correctly?**  
 11 A. You did, yes.  
 12 **Q. All right. Tell me how the allegations**  
 13 **made by Ms. Bonar were, in your judgment, politically**  
 14 **motivated.**  
 15 A. The allegations made, and at this point in  
 16 time and even today, at this point in time were all  
 17 vague allegations, and I knew them to all be untrue,  
 18 and I felt at that point that because I knew they  
 19 were untrue and because the timing of these  
 20 allegations, two weeks before voting, and because I  
 21 was told that there was a -- or I knew facts that  
 22 there was an investigator hired by somebody that were  
 23 calling around and telling other people that they  
 24 were looking to find something on Representative  
 25 Trujillo, I felt these were politically motivated

1 because of the timing and I knew they were untrue.  
 2 **Q. Okay. I understand your -- your perception**  
 3 **that they were and are untrue. I'm trying to focus**  
 4 **on the political motivation that you've ascribed in**  
 5 **these accusations, and you've stated that you -- the**  
 6 **timing is --**  
 7 A. Um-hum.  
 8 **Q. -- one element that caused you to believe**  
 9 **they were -- they were politically motivated. Is**  
 10 **that correct, is that --**  
 11 A. Correct.  
 12 **Q. And, secondly, you had heard of an**  
 13 **investigator?**  
 14 A. Correct, and --  
 15 **Q. Tell me about -- tell me about anything**  
 16 **else. I just want to know, is that the universe of**  
 17 **the reasons why you felt they were politically**  
 18 **motivated at the time you wrote this letter?**  
 19 A. No, I believe there were other reasons.  
 20 **Q. What are they? I want to know them all.**  
 21 A. Well, let me back up. I did tell you about  
 22 Michael Corwin in our investigation as the individual  
 23 that was calling around, and he is a professional  
 24 investigator.  
 25 I do believe that this wasn't followed --

1 confidentiality policy wasn't followed by Ms. Bonar  
 2 or any others that submitted letters.  
 3 **Q. So I'm talking about at the time you wrote**  
 4 **this letter, correct?**  
 5 A. That's -- that's correct.  
 6 **Q. Okay.**  
 7 A. I felt that legislative council had  
 8 breached my confidentiality on May 2nd by  
 9 contacting the media.  
 10 I felt Ms. Bonar had breached my  
 11 confidentiality that same day by sending this out to  
 12 X amount of news outlets.  
 13 I felt that the --  
 14 **Q. Let me -- keep going.**  
 15 A. I felt that there was -- as I read the  
 16 policy, that -- that formal complaint should be  
 17 followed -- filed, which it never was.  
 18 I felt that even if we used the other  
 19 section of the anti-harassment policy or legislative  
 20 council Rule 16, that even if it's just an open  
 21 complaint, that reasonable particularity must be  
 22 stated.  
 23 **Q. Okay.**  
 24 A. I felt that there was other legislators who  
 25 had signed the policy that had submitted letters to



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1 the media and so -- and, also, on May 8th, when the  
 2 policy says exclusively that this needs to remain  
 3 confidential, they send out a press release.  
 4 And so the whole idea of the inaction for  
 5 six days on some open letter that was never submitted  
 6 to legislative council, had no reasonable  
 7 particularity, was meant for embarrassment in the  
 8 media, which did take place with 10s or 20 or 30, I  
 9 could count them, articles of misrepresentation.  
 10 **Q. Does that cover the waterfront?**  
 11 A. For the most part.  
 12 **Q. All right, let's go back. Let me just**  
 13 **clean up some of it, make sure I understand. You**  
 14 **talked about legislative council policy number 16 and**  
 15 **you said the part that does not require a formal**  
 16 **complaint, but in your estimation requires**  
 17 **"reasonable particularity"?**  
 18 A. It says it in the policy.  
 19 **Q. That's -- that's what you're relying on,**  
 20 **correct?**  
 21 A. I am -- I don't have the policy in front of  
 22 me --  
 23 **Q. Well, we'll get to that, but I just want to**  
 24 **know what you're feelings are. That you felt that**  
 25 **even if the other -- you mentioned the other part of**

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1 **legislative council policy 16 was followed, you think**  
 2 **there was not reasonable particularity, and as a**  
 3 **result it was -- something's wrong there?**  
 4 MR. JACKSON: So I'm going to object here.  
 5 These are legal arguments about whether or not  
 6 policies been violated, and those are legal questions  
 7 for his lawyers and not fact questions for a  
 8 deposition.  
 9 MR. HNASKO: No, I didn't ask the question.  
 10 He's the one who brought it up, not me.  
 11 **Q. (By Mr. Hnasko) So I'm asking what your**  
 12 **perception of that is? I just want to make sure I**  
 13 **understand --**  
 14 A. I feel I was violated.  
 15 **Q. Pardon?**  
 16 A. I feel the policy was violated.  
 17 **Q. Because there was not reasonable**  
 18 **particularity in this open letter?**  
 19 A. Yes.  
 20 **Q. All right. Fair enough.**  
 21 **And is it your belief that the House of**  
 22 **Representatives does not have the authority to**  
 23 **investigate allegations of harassment unless a**  
 24 **complainant comes forward with specific allegations,**  
 25 **reasonable specificity of those?**

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1 MR. JACKSON: Same objection.  
 2 **Q. Is that your belief?**  
 3 A. I believe that these are arguments that  
 4 need to be made by lawyers on the policy.  
 5 **Q. Well, we'll be making them. I just want to**  
 6 **know what your belief is. I'm not holding you to a**  
 7 **legal standard.**  
 8 A. I'll refrain from -- to seeing the  
 9 arguments after --  
 10 **Q. So you don't have a view on that, so can I**  
 11 **scratch that off as one of the reasons why you felt**  
 12 **this was politically motivated if you don't have a**  
 13 **view on whether --**  
 14 A. No, I think I --  
 15 **Q. -- there is a requirement of reasonable**  
 16 **particularity?**  
 17 MR. JACKSON: Same objection.  
 18 A. I've laid the statements as far as why I  
 19 believe that -- that it was.  
 20 **Q. And you mentioned one of them being that**  
 21 **the other part, I'm using your words, of legislative**  
 22 **policy rule number 16 requires a complaint with**  
 23 **reasonable particularity.**  
 24 A. It says that in the policy.  
 25 **Q. And that's one of the reasons why you**

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1 **believe this a politically-motivated allegation,**  
 2 **correct, at least at the time you wrote the letter?**  
 3 A. I believe that it's suspect to the timing.  
 4 **Q. And I'm -- I'm asking you a general**  
 5 **question, Representative. Do you believe, as a**  
 6 **member of the House of Representatives, that the**  
 7 **leadership in the House does not have the ability or**  
 8 **duty to investigate allegations of harassment unless**  
 9 **those allegations are stated with reasonable**  
 10 **particularity?**  
 11 MR. JACKSON: Same objection.  
 12 **Q. You may have -- you may not have a belief.**  
 13 **I just want to know where you are on it.**  
 14 A. I stand with my lawyer.  
 15 **Q. He's not -- he's not directing you not to**  
 16 **answers the question.**  
 17 MR. JACKSON: He's answered the question  
 18 that he thinks the policies were violated, and that's  
 19 sufficient for purposes today. Let's move on.  
 20 MR. HNASKO: No, it's not.  
 21 **Q. (By Mr. Hnasko) I want to know, as a**  
 22 **legislator, sitting legislator, whether you believe**  
 23 **that the House of Representatives does not have the**  
 24 **ability to investigate its own members based on**  
 25 **allegations of harassment unless those allegations**



1 **are stated with reasonable particularity?**

2 MR. JACKSON: Same objection. This is a  
3 legal question for lawyers.

4 MR. HNASKO: I agree with that, but it  
5 doesn't matter. I want to know what he believes.

6 MR. JACKSON: You're asking him a legal  
7 question, and I'm objecting to it. I'm going to  
8 instruct you not to answer. Move on.

9 MR. HNASKO: You're instructing the witness  
10 not to answer a non-privileged question?

11 MR. JACKSON: Yeah.

12 MR. HNASKO: Okay, we'll take that up  
13 later. Are you sure you want to do that?

14 MR. JACKSON: I am. I've let you ask this  
15 question ten times.

16 MR. HNASKO: All right, well, he's --

17 MR. JACKSON: Let me finish. Don't talk  
18 over me.

19 MR. HNASKO: Don't talk to me that way.

20 MR. JACKSON: I've let you ask --

21 MR. HNASKO: Don't talk to me that way.

22 MR. JACKSON: I've let you ask this  
23 question ten times.

24 (Simultaneous cross-talk.)

25 MR. JACKSON: I've let you ask this

1 I've objected to the question ten times.

2 I'm instructing you not to answer.

3 **Q. (By Mr. Hnasko) Are you going to follow  
4 that instruction?**

5 A. Yes.

6 **Q. All right. And if you're going to follow  
7 that instruction, I want you to know that you're  
8 running the risk of coming back here, and we're going  
9 to ask for attorney's fees when you do that a second  
10 time. Just so you know that.**

11 A. Can we take a break?

12 **Q. Let's go back and talk about -- he's  
13 instructed you not to answer. You can follow your  
14 attorney's advice.**

15 MR. JACKSON: He asked if we could take a  
16 break.

17 MR. HNASKO: Oh, you did? I'm sorry.  
18 Yeah, you can take a break. Off the record.

19 (A recess was taken from 9:46 to 9:53 a.m.)

20 **Q. (By Mr. Hnasko) All right, Mr. Trujillo,  
21 when you went through the list of reasons why you  
22 tell Ms. Bonar's open letter was politically  
23 motivated, you mentioned a man by the name of Michael  
24 Corwin. Did I get that right?**

25 A. Correct.

1 question ten times, and he's given you his answer.  
2 I've objected. You've got your answer which is he  
3 thinks the policies were violated, and that's the  
4 reason why he thinks it was politically motivated.

5 MR. HNASKO: All right.

6 MR. JACKSON: Asked and answered. Move on.

7 MR. HNASKO: You're not directing my  
8 deposition, so just relax, okay. And mind your  
9 manners here.

10 MR. JACKSON: Mind your own manners, Mr. --

11 MR. HNASKO: You be a professional, all  
12 right. Let me tell you what he said. I've asked him  
13 for a laundry list of reasons why he thought this  
14 complaint is politically motivated. One of them was  
15 he felt that the other part of Rule 16 did not allow  
16 investigation unless the allegations were stated with  
17 reasonable particularity. I've asked him --

18 MR. JACKSON: That's your testimony, not  
19 his.

20 MR. HNASKO: I've asked him a follow-up  
21 question as to whether the legislature, in his  
22 judgment, has the ability to investigate allegations  
23 of harassment unless those allegations are made with  
24 reasonable particularity? It's yes or no.

25 MR. JACKSON: He's asked and answered.

1 **Q. And how do you spell that last name?**

2 A. I don't know for sure.

3 **Q. C-O-R-W-I-N, probably, something like that?**

4 A. (No audible response.)

5 **Q. Who is he?**

6 A. He -- I don't know who he is. I know  
7 he's -- I was told he was an investigator.

8 **Q. How were you -- who told you that?**

9 A. I don't recall, I just -- but you can look  
10 him up online and he's listed as an investigator.

11 **Q. Well, how did you know or how did you come  
12 to the conclusion that he was investigating  
13 something?**

14 A. I came to the conclusion because a couple  
15 people told me that they had been called by him.

16 **Q. Who told you?**

17 A. I gave her as a witness in the -- the one  
18 time that we met in the investigation, her name was  
19 Jennifer Block, which I don't believe that you guys  
20 ever called. And the other person was -- I don't  
21 recall who the other person was.

22 **Q. So Jennifer Block and some other person --**

23 A. Yes.

24 **Q. -- told you?**

25 A. Another woman.



1           **Q. And when did they tell you?**  
2           A. One told me during the session, and one  
3 called me after the session. Jennifer called me  
4 after the session. She sent me the -- yes.  
5           **Q. After the session, but before the open**  
6 **letter of Ms. Bonar?**  
7           A. Yes.  
8           **Q. And was it Jennifer Block who talked to you**  
9 **during the session?**  
10          A. No.  
11          **Q. She called you after the session?**  
12          A. Yes.  
13          **Q. And who is Jennifer Block?**  
14          A. She is a woman that worked for the highway  
15 department that -- I don't know what her job title  
16 is.  
17          **Q. Does she still work for the highway**  
18 **department?**  
19          A. To my knowledge, yes.  
20          **Q. And what did she tell you?**  
21          A. That she had received a phone call, and  
22 that this investigator called her and said had you  
23 ever -- I'm just trying to reiterate, but that she  
24 called her and said, have you -- do you know  
25 Representative Trujillo?

1           Yes.  
2           Has he ever made you feel uncomfortable or  
3 done anything to make you feel uncomfortable, in  
4 which case she said no, and that was extent of it.  
5          **Q. Did you talk to Ms. Block by phone or in**  
6 **person?**  
7          A. Ms. Who?  
8          **Q. Block.**  
9          A. Oh, she called me right after to tell me.  
10          **Q. Okay. Anything else --**  
11          A. No.  
12          **Q. -- that she imparted about Mr. Corwin and**  
13 **his activities?**  
14          A. No, just that she felt the call was very  
15 strange and made her feel uncomfortable.  
16          **Q. And the other person called you after the**  
17 **session?**  
18          A. That was during.  
19          **Q. During the session. Ms. Block was after.**  
20          A. Yes.  
21          **Q. How long after, do you -- do you recall**  
22 **generally?**  
23          A. I don't recall.  
24          **Q. It was prior to the open letter, you said**  
25 **that, right?**

1           A. Yes.  
2          **Q. And during the session, what did this other**  
3 **person tell you?**  
4          A. Something very similar, that a private  
5 investigator was being hired, asking anybody and  
6 everybody is what they told me, that if  
7 Representative Trujillo had ever made you feel  
8 uncomfortable.  
9          **Q. Uncomfortable in what sense?**  
10          A. I have no idea.  
11          **Q. Did you take that to mean a sexual**  
12 **harassment context?**  
13          A. I don't -- I can't -- I wasn't part of the  
14 conversation.  
15          **Q. I'm asking how you took it?**  
16          A. I don't know.  
17          **Q. How did you take it when it was explained**  
18 **to you? What was your perception?**  
19          A. I just found it odd.  
20          **Q. What type of uncomfortable activities were**  
21 **you -- did you believe they were referring to?**  
22          A. I couldn't tell you.  
23          **Q. So you didn't know whether it was sexual**  
24 **harassment or some other type of harassment --**  
25          A. I wasn't --

1          **Q. -- or anything else?**  
2          A. I wasn't part of this conversation, so I  
3 don't -- I don't know.  
4          **Q. There were no indications from Ms. Block or**  
5 **this other person that the -- this --**  
6          A. Yes, Ms. Block there was. I think I  
7 mentioned that to you.  
8          **Q. I didn't finish my question. There was no**  
9 **indication from Ms. Block or the other person that**  
10 **the -- that Mr. Corwin was asking questions that**  
11 **related to allegations of sexual harassment?**  
12          A. What Ms. Block told me was, as best as I  
13 can remember, is he asked has he ever done anything  
14 to make you feel uncomfortable.  
15          **Q. And how did you take that? To mean what?**  
16          A. I -- I just -- she felt it was very odd,  
17 and I felt it was very odd to get a cold call like  
18 that.  
19          **Q. But you didn't have any idea in your own**  
20 **mind what she was referring to when she said**  
21 **uncomfortable?**  
22          A. I wasn't part of the conversation.  
23          **Q. I'm talking about in your own mind, what**  
24 **did you take that to mean? I know it wasn't part of**  
25 **the conversation. I want to know how Carl Trujillo**



1 interpreted that. Did you interpret the term  
2 uncomfortable as implying uncomfortable in a sexual  
3 harassment nature or some other context?

4 A. Could be -- could be that, could be other.  
5 I mean, I don't -- I don't know. I mean, people  
6 can -- I don't know.

7 Q. So you didn't form an impression one way or  
8 the other?

9 A. Well, uncomfortable can mean many different  
10 things.

11 Q. It can, but I want to know what it means to  
12 you. I'm just saying, did you form -- if you didn't  
13 form an impression, that's perfectly fine. We'll  
14 move on.

15 A. I didn't.

16 Q. All right, fair enough.

17 So the other person who told you during the  
18 legislature, you mentioned it was a woman?

19 A. Correct.

20 Q. You don't know who it was?

21 A. At this time, I don't. I have to remember,  
22 but I -- I'll think about it.

23 Q. Okay, if you think about it during this  
24 deposition and your memory is jogged, would you --

25 A. Yes.

1 that Mr. Corwin had some association with Ms. Bonar?

2 A. I couldn't say.

3 Q. But you said they were politically  
4 motivated, so I'm trying to connect the dots here.  
5 Ms. Bonar is the one who wrote the letter, correct?

6 A. Yes, that's correct.

7 Q. All right, so what is her association, if  
8 any, with Mr. Corwin?

9 A. I couldn't -- I can't answer that fairly.  
10 I mean, I don't -- I don't know what correlation they  
11 have. I don't know if they've ever spoke. I don't  
12 know.

13 Q. At the time you wrote this letter, you  
14 didn't have any information indicating that there was  
15 any association between Mr. Corwin and Ms. Bonar?

16 A. The fact -- what I do know is that  
17 Mr. Corwin called I don't know how many people, but  
18 called people, and who he called I don't know.

19 Q. I'm not asking that question. I'm asking  
20 if you had any information indicating an association  
21 between Mr. Corwin and Ms. Bonar?

22 A. I don't have any information.

23 Q. You didn't have any at the time you wrote  
24 this letter, correct?

25 A. I just stand behind the letters and the

1 Q. -- be so kind as to tell me?

2 A. Yes.

3 Q. All right. Is it someone who is related to  
4 you?

5 A. No.

6 Q. So when you heard about Michael Corwin, did  
7 you endeavor to find out who he was?

8 A. Other than a Google search and finding out  
9 that he was an investigator and -- being told he was  
10 an investigator, yeah, that's what I know.

11 Q. So you did the Google search?

12 A. I did a Google search on him, yes.

13 Q. When did you do that?

14 A. When I was told.

15 Q. Okay, well, you were told once during the  
16 session and once after, so was a Google search  
17 performed during the session or after?

18 A. I -- I couldn't recall.

19 Q. Okay. Did you ever find out who Mr. Corwin  
20 was associated with?

21 A. No. I wish I would have, though. I  
22 couldn't -- wouldn't show up on any campaign records  
23 of who paid him.

24 Q. At that time, when you wrote this letter to  
25 the investigative subcommittee, was it your belief

1 evidence that we've put --

2 Q. I'm not asking that. I know you do. I'm  
3 asking a very specific point here, whether, at the  
4 time you wrote this letter, you had any indication of  
5 an association between Mr. Corwin and Ms. Bonar?

6 A. I can -- I can only make assumptions.

7 Q. And today, as you sit here talking to me,  
8 do you believe that Mr. Corwin had an association  
9 with Ms. Bonar?

10 A. I can only make an assumption. I don't  
11 know.

12 Q. What's your assumption?

13 A. I don't know. I don't have enough evidence  
14 to know otherwise.

15 Q. Do you have any evidence?

16 A. No, not at this current time, that they've  
17 had an association.

18 Q. Did you have any evidence at the time you  
19 wrote this letter that Mr. Corwin had any association  
20 with Animal Protection Voters of New Mexico?

21 A. I don't have -- at this time, I don't have  
22 any evidence.

23 Q. And when you wrote the letter saying that  
24 this was the politically motivated, did you have any  
25 evidence?



1 A. When I wrote the letter -- you're talking  
2 letter, you're referring to this?

3 **Q. I, yeah, right in front of you, Exhibit 1**  
4 **when you say they are false and they were politically**  
5 **motivated, I'm trying to find out what facts you have**  
6 **supporting the conclusion that they were politically**  
7 **motivated.**

8 A. I think the facts, in my opinion, are all  
9 laid out in the evidential binder that I produced of  
10 several hundred pages. That is what I believe gets  
11 me to the point of -- of that statement.

12 **Q. All right. And we went through the bases**  
13 **for your statement that they were politically**  
14 **motivated, and one of the bases was that this fellow**  
15 **named Michael Corwin was apparently conducting an**  
16 **investigation, so I wanted to know if you had any**  
17 **evidence that Mr. Corwin was associated with Animal**  
18 **Protection Voters of New Mexico at the time you wrote**  
19 **this letter?**

20 A. So at your investigation meeting between  
21 you and I, and Randi, and Tad Parrish, we brought  
22 this up, and I guess my question would be is did you  
23 investigate to see if he was part of this. I didn't  
24 have the resources to do so.

25 **Q. Well, unfortunately today I ask the**

1 **binder suggesting that Mr. Corwin was associated with**  
2 **Ms. Bonar or with APV, correct?**

3 A. I -- I could look through it again, but I  
4 don't -- I mean, we could both look through it and  
5 see, but --

6 **Q. Well, I'm asking you.**

7 A. -- I don't believe there is.

8 **Q. All right. So political motivations, let's**  
9 **explore that further. Who was politically motivated**  
10 **to submit this open letter that Ms. Bonar submitted**  
11 **asking for your resignation?**

12 A. Who was?

13 **Q. Politically motivated.**

14 A. So I think that you -- I mean, it's -- I  
15 can only go from ideas of -- of who were unhappy with  
16 votes.

17 **Q. That's fine.**

18 A. I know that Julianna Koob was extremely  
19 unhappy with one of my votes, and -- very, very, very  
20 unhappy.

21 **Q. Do you think Ms. Koob had some connection**  
22 **with Ms. Bonar's submission of the open letter?**

23 A. I don't know at this -- at this point.

24 (Ms. Julie Sakura joined the deposition.)

25 **Q. Well, you said they were politically**

1 **questions and you answer them.**

2 A. So I think I've answered --

3 **Q. I'm asking you the question.**

4 A. So I think I've answered your question  
5 already, and I do not have any knowledge of the two  
6 of them -- if you could rephrase the question.

7 **Q. Well, my question was quite simple, you**  
8 **went through the laundry list of reasons why you felt**  
9 **the open letter submitted by Ms. Bonar was**  
10 **politically motivated. One of the reasons was the**  
11 **apparent existence of this fellow, Michael Corwin,**  
12 **who was conducting some investigation on behalf of**  
13 **someone. He apparently, according to you, was asking**  
14 **people whether you had made them feel uncomfortable.**  
15 **I'm trying to find out whether you had any evidence**  
16 **that Mr. Corwin was associated in any capacity with**  
17 **Ms. Bonar or with APV at the time you wrote the**  
18 **letter stating it was politically motivated.**

19 A. The statement of the letter that you're  
20 referring to is all -- based on all of the evidence  
21 that I could possibly find, and it's all compiled in  
22 the evidence binder, and so anything other than that  
23 is -- I don't -- that's what I have at that current  
24 time.

25 **Q. Fair enough. And there's nothing in the**

1 **motivated.**

2 **Um-hum.**

3 MR. HNASKO: Stay on the record. This is  
4 Julie Sakura, another lawyer in my office.

5 **Q. (By Mr. Hnasko) So do you have any evidence**  
6 **suggesting that Ms. Koob had a connection with**  
7 **Ms. Bonar's submission of her open letter?**

8 A. Do I have any evidence?

9 **Q. Yes.**

10 A. I don't have any evidence, not that I  
11 know -- not at this point.

12 **Q. Who else would be politically motivated?**  
13 **Who else would you believe would be politically**  
14 **motivated at the time you wrote Exhibit 1? And by**  
15 **politically motivated, I mean politically motivated**  
16 **to have Ms. Bonar submit that open letter.**

17 A. It's hard for me to identify exactly who.  
18 I just -- as stated in here, and many of the other  
19 letters that were written, is that timing is very  
20 unusual, and I've laid out all the facts and the fact  
21 that I know that I never did this made me feel this  
22 way.

23 **Q. I'm not -- I'm not even approaching those**  
24 **areas that -- your belief that you didn't do this and**  
25 **the timing causes you to think there is some --**



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1 something going on here that isn't aboveboard. I'm  
 2 curious as -- you state throughout this letter -- not  
 3 throughout it, but you do state here on page 2, and  
 4 in other submittals, that this was politically  
 5 motivated, so it's fair for me to try to find out --  
 6 A. Sure.  
 7 Q. -- who was politically motivated to cause  
 8 the submission of this open letter calling for your  
 9 resignation. You've identified Julianna Koob --  
 10 A. Um-hum.  
 11 Q. -- correct? All right, but you don't know  
 12 of any evidence connecting her to Ms. Bonar or the  
 13 open letter, right?  
 14 A. I don't, other than finding out post-  
 15 investigation that Julianna Koob's name was actually  
 16 in some of those documents that you submitted.  
 17 Q. Okay. Any of those documents predate the  
 18 open letter?  
 19 A. I couldn't tell you unless I see them,  
 20 but...  
 21 Q. All right. Anyone else besides Ms. Koob  
 22 who would -- you believe would have been politically  
 23 motivated to cause Ms. Bonar to submit the open  
 24 letter?  
 25 A. I wish I had all the information in front

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1 of me. No, I just don't know.  
 2 Q. You don't know?  
 3 A. Don't know.  
 4 Q. All right. On the bottom -- in the middle  
 5 of that page before the gray area, where you see  
 6 "2013 timeline" --  
 7 A. Um-hum.  
 8 Q. -- there's a statement that says, "As  
 9 proven in the timelines and attached documents, the  
 10 anti-harassment policy is being used as a political  
 11 weapon, and I am a target of this political weapon."  
 12 Do you see that?  
 13 A. So --  
 14 Q. Right above the grayed-out area, the last  
 15 sentence beginning with "as proven."  
 16 A. Okay.  
 17 Q. Did I read that correctly?  
 18 A. You did.  
 19 Q. All right. And, Mr. Trujillo, explain to  
 20 me in your own words, if you would, please, how the  
 21 anti-harassment policy was used as a political weapon  
 22 in this instance?  
 23 A. I think it's laid out very succinctly in  
 24 the timeline and the arguments made here, so I would  
 25 stand by that.

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1 Q. Summarize for me, if you would, please,  
 2 outside the timeline -- you can refer to the timeline  
 3 certainly -- as to how you believe this was used as a  
 4 political weapon when the only person you identified  
 5 as you believe -- believe may have some connection --  
 6 or would have some political motivation would be  
 7 Julianna Koob. How is this used as a political  
 8 weapon against you?  
 9 A. Because it was an open letter that was  
 10 filed to the media, I think it's been made very  
 11 clear; never followed policy; didn't go into  
 12 legislative council on day one, even a reference,  
 13 didn't go in until six days later after there was  
 14 total embarrassment in the media.  
 15 Q. But let me -- keep going. I don't want to  
 16 interrupt you.  
 17 A. So the question was how do I feel it was  
 18 being used as a political weapon, because it was  
 19 distributed breaking all confidentiality, and in the  
 20 letter -- in the letter, Ms. Bonar's letter -- she  
 21 states -- she states the policy which does talk about  
 22 confidentiality, and so that's breached, sent to the  
 23 media, six days later is when finally something is  
 24 submitted to legislative council. So...  
 25 Q. So I'm trying to get my arms around the

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1 entire concept here, and it appears to me -- tell me  
 2 if I'm wrong, please -- that you believe this was  
 3 used as a political weapon, but you just don't know  
 4 by whom?  
 5 A. I gave you my -- I mentioned Julianna Koob.  
 6 Q. So you think Ms. Koob is behind this?  
 7 A. I believe that -- I don't know. I have  
 8 suspicions. All I can have is suspicions. I need  
 9 facts.  
 10 Q. All right. So outside of your suspicions,  
 11 is it fair to say you believe this was used against  
 12 you as a political weapon, but you're not sure by  
 13 whom?  
 14 A. Or -- or who all the people were, yes.  
 15 Q. All right. Let me direct your attention to  
 16 page 4 of Exhibit 1. And there are a number of  
 17 bullets under the 2014 timeline. You see that?  
 18 A. Um-hum.  
 19 Q. We have two dark bullets, and then  
 20 underneath the second dark bullet, four other  
 21 bullets.  
 22 A. Um-hum.  
 23 Q. And the third bullet within that four, you  
 24 indicate that on January 28, 2014, you placed a call  
 25 to Ms. Bonar's cell phone which lasted about two



1 minutes, do you see that?

2 A. I do.

3 **Q. I just want to be clear, this is the --**  
4 **January 28, 2014, is the day where you presented an**  
5 **HB20 to the House Consumer and Public Affairs**  
6 **Committee, is that accurate?**

7 A. As I recall, yes.

8 **Q. When you wrote this letter, did you recall**  
9 **Ms. Bonar being with you in the House Consumer and**  
10 **Public Affairs Committee on January 28, 2014?**

11 A. I do not.

12 **Q. Do you recall that today as we sit here?**

13 A. No.

14 **Q. So you have no recollection of Ms. Bonar**  
15 **being in that committee hearing room on January 28,**  
16 **2014, when you were presenting HB20?**

17 A. A recollection of her being -- I don't have  
18 any recollection.

19 **Q. You started to say something. You have a**  
20 **recollection of --**

21 A. No, I said no recollection.

22 **Q. No recollection. Throughout this whole**  
23 **process, including up through today, you don't**  
24 **remember Ms. Bonar being present in that committee**  
25 **room on January 28th?**

1 A. From the e-mail sent, I know that she was  
2 there, sounds like, but I don't recall her being  
3 there.

4 **Q. Which e-mail?**

5 A. The e-mail that she sent the very next day,  
6 29th.

7 **Q. That's the last bullet point on page 4 of**  
8 **Exhibit 1?**

9 A. Yes.

10 **Q. She didn't indicate in that e-mail that she**  
11 **was present, correct?**

12 A. I'd need to see the e-mail. Maybe you have  
13 a copy.

14 **Q. According to your quote, at least within**  
15 **the quoted language.**

16 A. So please repeat the question.

17 **Q. The summary of the language in the e-mail**  
18 **in your letter does not indicate whether she was or**  
19 **was not present on January 28th for the presentation**  
20 **of HB20?**

21 A. The bullet may not indicate it, but I'd  
22 have to see the e-mail, because I think --

23 **Q. You think she was?**

24 A. Because the e-mail states, "sorry for  
25 pushback."

1 (Exhibit 2 marked.)

2 **Q. (By Mr. Hnasko) Let me hand you Exhibit 2.**  
3 **Could you briefly review that and identify it for the**  
4 **record.**

5 A. This was the -- after meeting with special  
6 counsel -- counsels in my one and only interview, and  
7 after we had been told or briefed on what the more  
8 specific obligations were, we submitted a second  
9 evidence package and this is part of it.

10 **Q. All right. At the bottom of page 1 --**  
11 **excuse me, the bottom of the first full paragraph on**  
12 **page 1, you indicate that "I have attached more**  
13 **specific affidavit testimony, and I am willing to**  
14 **undergo a more specific polygraph examination." Did**  
15 **I read that correctly?**

16 A. Yes.

17 **Q. Have you undergone a more specific**  
18 **polygraph examination?**

19 A. No.

20 (Exhibit 3 marked.)

21 **Q. (By Mr. Hnasko) Let me hand you Exhibit 3.**

22 MR. JACKSON: Before you get into this, I'm  
23 going to make an objection on the record.

24 MR. HNASKO: Well, why don't we identify it  
25 first.

1 **Q. (By Mr. Hnasko) Could you briefly review**  
2 **and identify Exhibit 3, please.**

3 MR. JACKSON: I'd like to make an objection  
4 on the record first, please. Respondent objects to  
5 any line of inquiry regarding Martha Trujillo on  
6 grounds it is not relevant, it is intended to harass  
7 and annoy. Counsel have discussed this objection on  
8 multiple occasions in advance of this deposition;  
9 charging party was aware of the objection before  
10 taking the deposition and elected to proceed anyway.  
11 Charging party has indicated that it is going to file  
12 a motion to compel regarding discovery on Martha  
13 Trujillo, and we're going to object to any type of  
14 questioning today until that motion is resolved.

15 MR. HNASKO: All right, I'll make my  
16 record.

17 **Q. (By Mr. Hnasko) Could you identify**  
18 **Exhibit 3, please.**

19 MR. JACKSON: I'm going to object and  
20 instruct the witness not to answer.

21 MR. HNASKO: To identification of the  
22 exhibit? We need to have a record of what you're  
23 objecting to. Let him identify the exhibit.

24 **Q. (By Mr. Hnasko) Can you identify the**  
25 **exhibit?**



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1 A. I'm following my counsel...

2 **Q. I'm asking, would you please identify**

3 **Exhibit 3**

4 MR. JACKSON: I've objected and instructed

5 him not to answer any questions relating to Martha

6 Trujillo. This appears to be a letter from Martha

7 Trujillo dated September 19, 2018. For all the

8 reasons we've already discussed in advance of this

9 deposition, I object to you asking him questions

10 about it.

11 MR. HNASKO: Let the record reflect that

12 counsel is preventing the witness from identifying an

13 exhibit I've offered in this deposition.

14 **Q. (By Mr. Hnasko) Exhibit 3 is a letter dated**

15 **September 19, 2018, purportedly from Martha Trujillo,**

16 **captioned "Dear Senator." Have you seen this**

17 **letter before?**

18 MR. JACKSON: Same objection. Instructing

19 the witness not to answer.

20 **Q. (By Mr. Hnasko) Mr. Trujillo, did you have**

21 **any involvement in the preparation of this letter?**

22 MR. JACKSON: Same objection. I'm not

23 going to allow you to ask every question you have

24 about Martha Trujillo.

25 MR. HNASKO: I'm going to make my record,

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1 and then you can object and instruct him not to

2 answer.

3 MR. JACKSON: Standing objection.

4 MR. HNASKO: There's no such thing as a

5 standing objection.

6 MR. JACKSON: I'm making a standing

7 objection to all lines of inquiry relating to Martha

8 Trujillo.

9 MR. HNASKO: You can, you can direct him

10 not to answer if you want.

11 MR. JACKSON: I already have.

12 **Q. (By Mr. Hnasko) Who is Martha Trujillo?**

13 MR. JACKSON: Same objection.

14 **Q. Do you know Martha Trujillo?**

15 MR. JACKSON: Same objection.

16 **Q. Did you prepare this letter for Martha**

17 **Trujillo's signature?**

18 MR. JACKSON: Same objection.

19 **Q. Why did you do it?**

20 MR. JACKSON: Same objection.

21 **Q. Is Martha Trujillo related to you?**

22 MR. JACKSON: I'll let you answer that.

23 A. Yes.

24 **Q. Who is she?**

25 A. She's my aunt.

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1 **Q. And does she live in Nambe?**

2 A. She lives in Pojoaque.

3 **Q. Does she have a job?**

4 MR. JACKSON: Objection.

5 **Q. What does she do for a living?**

6 MR. JACKSON: Objection. Same objection.

7 **Q. Let me just be very clear. I want you to**

8 **be on the record on this, Mr. Trujillo. Your counsel**

9 **has directed you not to answer these questions; I**

10 **want it to come from your mouth, as well. Are you**

11 **refusing to answer any questions about the letter**

12 **dated September 19, 2018, identified as Exhibit 3**

13 **purportedly sent by Martha Trujillo to members of the**

14 **New Mexico Senate?**

15 MR. JACKSON: I've instructed him not to

16 answer; he's following my instruction.

17 MR. HNASKO: Well, I want him to say he's

18 not going to answer.

19 **Q. (By Mr. Hnasko) Are you going to follow**

20 **your counsel's advice?**

21 A. I stand with my counsel's advice.

22 **Q. All right. And you know that if you come**

23 **back here, just so you're not surprised, that we will**

24 **be asking for attorney's fees when we bring you back**

25 **here, okay? Do you understand that?**

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1 A. Yes.

2 **Q. Okay.**

3 **(Exhibit 4 marked.)**

4 **Q. (By Mr. Hnasko) Let me hand you what will**

5 **be marked as Exhibit 4. In the interest of time, let**

6 **me represent to you this is part of the legislative**

7 **council rules, including Rule 16. Do you recognize**

8 **this rule?**

9 **(Ms. Julie Sakura left the deposition.)**

10 A. I do.

11 **Q. (By Mr. Hnasko) You've seen it before?**

12 A. Yes.

13 **Q. I'm going to direct your attention over to**

14 **what is denominated as page 25 of Exhibit 4,**

15 **paragraph H. Do you see that?**

16 A. Yes.

17 **Q. Could you read it to yourself and make sure**

18 **you've been through it all.**

19 A. Okay, I've read it.

20 **Q. All right. Paragraph H, is this the**

21 **paragraph, Mr. Trujillo, to which you referred when**

22 **you stated that the allegations of Ms. Bonar in her**

23 **open letter were required to be with reasonable**

24 **particularity?**

25 A. I see the words reasonable particularity in



1 here, and so I will say that that is one of the -- it  
2 says "shall state with reasonable particularity," but  
3 I'm not an attorney and I'll let my attorney and  
4 other attorneys argue on what is needed to meet that  
5 standard, but I do read "shall state with reasonable  
6 particularity."

7 **Q. Okay. Let's look at that a little more**  
8 **carefully, shall we. Let's take it part by part, if**  
9 **we could. First of all, it states that "During the**  
10 **interim" -- I'm quoting. "During the interim, the**  
11 **Speaker of the House of Representatives or the**  
12 **President Pro Tempore of the Senate, in conjunction**  
13 **with the appropriate majority and minority leaders,**  
14 **may also refer any ethics matter affecting a member**  
15 **of the respective House which might require an**  
16 **investigation to the Interim Legislative Ethics**  
17 **Committee." Did I read that correctly?**

18 A. Yes, you did.

19 **Q. All right. Do you understand that to be**  
20 **that any matter that comes to the attention of the**  
21 **leaders -- leadership may be referred by the**  
22 **leadership to the interim Legislative Ethics**  
23 **Committee?**

24 MR. JACKSON: Objection. Mr. Trujillo is  
25 not a lawyer.

1 **Q. -- to the interim legislative investigative**  
2 **committee or ethics committee? Would you agree with**  
3 **me on that, that clause standing alone would appear**  
4 **to give them that authority, correct?**

5 MR. JACKSON: Same objection. Counsel is  
6 asking for a legal conclusion.

7 **Q. Yes or no?**

8 A. I'm not going to give you a legal  
9 conclusion here.

10 **Q. I don't want one. I just want your -- I**  
11 **want your conclusion as a sitting legislator, can the**  
12 **matter be referred to the interim Ethics --**  
13 **Legislative Ethics Committee if leadership deems it**  
14 **appropriate to do so?**

15 A. Let's go on.

16 **Q. We're going to.**

17 A. Let's read the second part.

18 **Q. We're going to.**

19 MR. JACKSON: Don't interrupt him, please.  
20 If he think he needs to read those two clauses in  
21 tandem, let him answer the question.

22 MR. HNASKO: We're going to give him the  
23 chance to combine them both, believe me.

24 MR. JACKSON: Well, if combining them is  
25 his answer, let him answer the question.

1 **Q. Is that how you understand that?**

2 A. I'm not a lawyer. I mean, I'm -- I  
3 don't -- I'm not a lawyer.

4 **Q. I understand you're not a lawyer. You're a**  
5 **research technology level III, right?**

6 A. Correct.

7 **Q. All right. So you're not a lawyer, I**  
8 **understand. I'm not asking you a legal conclusion, I**  
9 **want you to know. You are a sitting member of the**  
10 **legislature, correct?**

11 A. Correct.

12 **Q. And you understand that first clause to**  
13 **allow the leadership to refer a matter to**  
14 **investigation -- to the investigative subcommittee if**  
15 **they deem it appropriate?**

16 A. What I read here is you have to read the  
17 whole paragraph.

18 **Q. Well, we're going to get there, but I just**  
19 **want to focus on that first clause.**

20 A. I'm not an attorney, and so I -- I'm not an  
21 attorney.

22 **Q. That clause, at least standing alone, would**  
23 **tell you that they can do that, correct, they can**  
24 **refer any matter they deem appropriate --**

25 MR. JACKSON: Same objection.

1 A. So my answer is, in combining these -- and  
2 I will read the second part.

3 **Q (By Mr. Hnasko) Okay, why don't you read**  
4 **that.**

5 A. "Such requests shall be in writing" --

6 **Q. No, no, no, no, go back and read the whole**  
7 **thing, beginning with "including when appropriate."**  
8 **Do you see that language?**

9 A. I see the language.

10 **Q. Okay, why don't you read it into the**  
11 **record.**

12 A. Read?

13 **Q. Counsel wanted you to read the whole thing,**  
14 **so read --**

15 MR. JACKSON: Why don't you just read the  
16 entire paragraph.

17 **Q. We've already read the first part, it says**  
18 **"they may always refer any ethics matter affecting a**  
19 **member of the respective House, which might require**  
20 **investigation, to the Interim Legislative Ethics**  
21 **Committee, including, when appropriate" -- now you**  
22 **take it up from there.**

23 A. If you want me -- I will proceed.

24 **Q. Okay, proceed.**

25 A. Okay, "During the interim, the Speaker of



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1 the House of Representatives, or the President Pro  
 2 Tempore of the Senate, in conjunction with the  
 3 appropriate majority and minority leaders, may also  
 4 refer any ethics matter affecting a member of the  
 5 respective House which might require investigation to  
 6 the interim Legislative Ethics Committee, including,  
 7 when appropriate, requests from legislators" --  
 8 **Q. "Requests by legislators."**  
 9 A. Oh, "...requests by legislators which ask  
 10 the Speaker or the President Pro Tempore, to provide  
 11 an investigation of the requesting legislator's own  
 12 conduct."  
 13 **Q. Can we stop it right there?**  
 14 A. "Such" -- please.  
 15 MR. JACKSON: Let him finish.  
 16 A. "Such requests" --  
 17 MR. HNASKO: Don't ask questions -- or  
 18 direct the witness --  
 19 MR. JACKSON: Don't interrupt the witness  
 20 when he's answering the question.  
 21 MR. HNASKO: I've got a series of  
 22 questions, and it's my right to do so, but finish  
 23 reading this. And then I want you to calm down.  
 24 A. Could you please let me finish reading --  
 25 answering the --

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1 **Q (By Mr. Hnasko) Okay, read the whole thing,**  
 2 **and we'll get --**  
 3 A. Okay, but you keep --  
 4 **Q. We're going to -- we're going to take it**  
 5 **point by point anyway. You want to read the whole**  
 6 **thing, read the whole thing.**  
 7 A. Okay. "Such requests shall be in writing  
 8 addressed to the Speaker or President Pro Tempore,  
 9 and shall state with reasonable particularity the  
 10 conduct to be investigated and the reason for the  
 11 request."  
 12 **Q. All right, you've done it. Okay, now let's**  
 13 **separate out what's trying to be accomplished here,**  
 14 **okay. Going back up, you read the language that said**  
 15 **any matter can be referred to the Interim Legislative**  
 16 **Ethics Committee, including, when appropriate,**  
 17 **requests by legislators. Do you see that language?**  
 18 MR. JACKSON: That's not what it says.  
 19 MR. HNASKO: It says "requests by  
 20 legislators."  
 21 MR. JACKSON: It doesn't say any matter.  
 22 MR. HNASKO: Oh, my God.  
 23 **Q. (By Mr. Hnasko) All right, let me start**  
 24 **over again. "...may also refer any ethics matter**  
 25 **affecting a member of the respective House which**

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1 **might require investigation to the interim**  
 2 **Legislative Ethics Committee." Are you with me so**  
 3 **far?**  
 4 A. (Witness nods head.)  
 5 **Q. So based on that clause, any matter could**  
 6 **be referred, correct?**  
 7 MR. JACKSON: Objection, calls for a legal  
 8 conclusion.  
 9 **Q. Correct? Mr. -- Mr. Trujillo, correct?**  
 10 A. I think --  
 11 **Q. Based on that clause, any matter can be**  
 12 **referred? We're going to get to the other clause in**  
 13 **a moment. Based on that clause, any matter can be**  
 14 **referred that might require investigation?**  
 15 A. I think this is a legal interpretation.  
 16 **Q. All right, and you --**  
 17 A. Any matter.  
 18 **Q. Okay, let's continue, because you're --**  
 19 **you're a smart guy, right? You understand what the**  
 20 **language means of your own rules. So it says,**  
 21 **"...including, when appropriate, requests by**  
 22 **legislators." Do you see that language which asks**  
 23 **the Speaker and the President Pro Tempore to provide**  
 24 **for an investigation of the requesting legislator's**  
 25 **own conduct. So that clause is referring to a**

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1 **request by a legislator to the Speaker and the**  
 2 **President Pro Tempore to investigate his or her own**  
 3 **conduct, correct?**  
 4 A. I'm listening to you. You're the one  
 5 interpreting --  
 6 **Q. Read it.**  
 7 A. I'm reading it.  
 8 **Q. Do you agree with that interpretation?**  
 9 MR. JACKSON: Same objection.  
 10 **Q. Do you agree? It's clearly referring to a**  
 11 **request by a legislator that his or her own conduct**  
 12 **be investigated. Do you see that language?**  
 13 A. I see language, yes.  
 14 **Q. Do you see that language?**  
 15 A. Yes.  
 16 **Q. All right. And you agree that's what it**  
 17 **means, a request by a legislator for the Speaker or**  
 18 **the President Pro Tempore to investigate that**  
 19 **legislator's conduct?**  
 20 MR. JACKSON: Same objection.  
 21 **Q. In other words, if a legislator believes he**  
 22 **or she is doing something that may raise an ethical**  
 23 **concern, he or she has the ability to make a request**  
 24 **for an investigation of that matter, correct?**  
 25 MR. JACKSON: Same.



1 A. You're interpreting this for me, so -- I  
2 mean, you're the one saying correct.

3 **Q. I want your --**

4 A. I'm not going to --

5 **Q. -- interpretation.**

6 MR. JACKSON: Same objection.

7 A. -- to make a legal opinion at this point.

8 **Q. You're the one who said time and time in**  
9 **your submittals and in this deposition that**  
10 **Ms. Bonar's open letter did not have reasonable**  
11 **particularity. I'm entitled to get to the basis for**  
12 **that position.**

13 MR. JACKSON: I believe he's referring to  
14 paragraph F --

15 MR. HNASKO: I don't care what -- don't  
16 testify for the witness. I'm going to paragraph H.

17 MR. JACKSON: You're claiming that  
18 paragraph H has to do with --

19 (Simultaneous cross-talk.)

20 MR. HNASKO: Stop testifying for the  
21 witness.

22 **Q. (By Mr. Hnasko) So, Mr. Trujillo, I want to**  
23 **go to that last line that you quoted earlier on H.**  
24 **Please go back to it. It says, "Such requests....,"**  
25 **correct?**

1 **know if you agree with that.**

2 MR. JACKSON: Same objection.

3 A. I don't know what requests you're even  
4 talking about.

5 **Q. Do you understand paragraph H?**

6 A. Not in the context you're putting it in.

7 **Q. Well, we read the language talking about**  
8 **requests by legislators for an investigation of their**  
9 **own conduct, we read that, didn't we?**

10 A. You say "such requests." What are the  
11 requests?

12 **Q. I'm asking you, because --**

13 A. I don't know.

14 **Q. -- we just went back and referred to**  
15 **"requests by legislators" in the middle of paragraph**  
16 **H, the only time "requests" appears before the last**  
17 **sentence where it says "such requests."**

18 MR. JACKSON: Is there a question?

19 **Q. Do you see that?**

20 A. I see that, but I don't understand your  
21 question.

22 **Q. So you don't understand how "such requests"**  
23 **relates to a request by a legislator for an**  
24 **investigation of his or her own conduct?**

25 A. You're -- I feel that you're making a jump

1 A. I see "such requests."

2 **Q. And "such requests" is referring to the**  
3 **requests by the legislators we just referenced,**  
4 **correct, the preceding sentence?**

5 A. I can't make that conclusion, but if you  
6 are.

7 **Q. You can't make that conclusion? I'm not**  
8 **going to argue with you about it. I just want to**  
9 **know whether you can't put those two -- connect those**  
10 **dots and come to the conclusion that such requests**  
11 **refers to the request made by a legislator for the**  
12 **Speaker and President Pro Tempore to investigate**  
13 **their own conduct, then it requires reasonable**  
14 **particularity so they can do so.**

15 A. What request are you speaking of?

16 **Q. I just pointed you to the language, "such**  
17 **requests" in the last sentence of paragraph --**  
18 **subparagraph H. Correct?**

19 A. I see "such requests."

20 **Q. And I want you to refer to the previous**  
21 **sentence where it says "when appropriate, requests by**  
22 **legislators," for an investigation of their own**  
23 **conduct. Then the language "such requests" refers,**  
24 **quite logically, to the requests by the legislators**  
25 **for an investigation of their own conduct. I want to**

1 here from both "requests," and I don't even know what  
2 request you're talking about.

3 **Q. What both "requests"?**

4 A. As I understand it, you're saying "requests  
5 by legislators" and "such requests."

6 **Q. Yeah, and I'm asking does "such requests"**  
7 **logically refer to "requests by legislators" in the**  
8 **preceding sentence?**

9 MR. JACKSON: Same objection.

10 **Q. I mean, there's no -- there's no**  
11 **reference -- you would agree with me that there's no**  
12 **reference to any request in the first clause of the**  
13 **first paragraph of -- of paragraph H where it**  
14 **indicates that the Speaker and Pro Tem can refer any**  
15 **matter to the Interim Legislative Ethics Committee;**  
16 **however, when the matter involves a legislator**  
17 **seeking a determination of his or her own conduct,**  
18 **they have to make a request and it has to state it**  
19 **with reasonable particularity? Isn't that a fair**  
20 **reading of paragraph H?**

21 MR. JACKSON: Same objection.

22 **Q. Is that a fair reading?**

23 A. If we're trying to get into the semantics  
24 and you're trying to ask me for a legal opinion on  
25 these semantics, I can't give you one.



1 **Q. I'm not asking for a legal opinion. I'm**  
 2 **not the one who raised this; you've raised it every**  
 3 **chance you can get. On reasonable particularity, I**  
 4 **want to know the basis for --**

5 MR. JACKSON: You're referring to the wrong  
 6 paragraph is the problem. Paragraph F relates to  
 7 when somebody else files a complaint against a  
 8 legislator.

9 MR. HNASKO: That's different. That's a  
 10 different process. That's a charge seeking  
 11 discipline. We're not -- we're not proceeding under  
 12 subparagraph F. That's why I'm under H.

13 **Q. (By Mr. Hnasko) Are you able to answer the**  
 14 **question, Mr. Trujillo, that "such requests" under**  
 15 **paragraph H refers to the requests made by a**  
 16 **legislator for an investigation of his or her own**  
 17 **conduct --**

18 MR. JACKSON: Same objection.

19 **Q. -- and in that instance requires reasonable**  
 20 **particularity?**

21 MR. JACKSON: Same objection.

22 A. Once again, I'm not going to -- I can't  
 23 give you an answer on trying to make a legal  
 24 determination of each exact word. As we all know  
 25 policy is interpreted different; that's why there's

1 **Q. And I'm not talking about your attorneys**  
 2 **raising it as a legal matter, I'm talking about you**  
 3 **raising it in your submittals to the press, the**  
 4 **public, and to the interim investigative committee.**

5 A. The -- you can read the open letter, as you  
 6 have, as I have, and you can make your own  
 7 determination there.

8 **Q. And you don't have an answer as to why you**  
 9 **are suggesting, on more than one occasion, that**  
 10 **Ms. Bonar's open letter is deficient because it**  
 11 **didn't state the allegations with reasonable**  
 12 **particularity?**

13 MR. JACKSON: Same objection. Asks for a  
 14 legal conclusion.

15 **Q. You're not able to answer that question; is**  
 16 **that fair?**

17 A. We both have Laura Bonar's open letter; we  
 18 both have read it. We can both look at the  
 19 statement, the paragraph in there, and determine --  
 20 or make our own judgments as far as what we feel  
 21 meets that burden.

22 **Q. And your judgment is that her letter was**  
 23 **required to state the allegations with reasonable**  
 24 **particularity because it follows the same rule as a**  
 25 **legislator making a request for an investigation of**

1 attorneys to argue these.

2 **Q. So do I understand you correctly, when the**  
 3 **legislature is enforcing its own rules on its own**  
 4 **members, it needs to get legal advice on every step**  
 5 **of the way; it can't make the determination**  
 6 **whether --**

7 MR. JACKSON: Object to form.

8 **Q. -- it has the power to move forward --**

9 MR. JACKSON: That's not what he said at  
 10 all.

11 **Q. -- it has the power to go forward and**  
 12 **conduct the investigation?**

13 A. That's not what I'm saying at all.

14 **Q. What are you saying?**

15 A. I'm saying that you're asking me to make a  
 16 determination on the nuances of this particular  
 17 paragraph, which I am not an attorney here to sit  
 18 here and argue those small nuances and differences of  
 19 what -- how we actually both, or independently,  
 20 believe this policy to read.

21 **Q. All right, fair enough. If you're not able**  
 22 **to make that determination on these "nuances," why**  
 23 **are you raising the issue in your defense of these**  
 24 **claims?**

25 MR. JACKSON: Same objection.

1 **his or her own conduct?**

2 A. I don't -- I'd have to go through and read  
 3 this policy in and out from these type of exact  
 4 detail --

5 **Q. H, I'm asking you just within the confines**  
 6 **of paragraph H.**

7 A. At this point, I can't sit here and answer  
 8 the exact determination of what you are trying to ask  
 9 me at this point.

10 **Q. You're not able to do that?**

11 A. Well, I'm -- at this point, I --

12 **Q. It's fine if you're not. I just want to**  
 13 **know. You're not able to do it?**

14 A. I will not say that I'm not able to do it.  
 15 What I'm saying is I will have to read through this  
 16 and speak with an attorney, or my attorney, to make  
 17 sure I understand exactly what you're trying to  
 18 suggest that I say.

19 **Q. I'm not trying to suggest you say anything.**  
 20 **I'm just trying to get you to acknowledge that the**  
 21 **term "such requests" refers to a request by a**  
 22 **legislator for an investigation of his or her own**  
 23 **conduct. That's -- I'm just asking you --**

24 MR. JACKSON: Same objection.

25 **Q. -- is that a fair reading of paragraph H?**



1 MR. JACKSON: Same objection. I think  
2 you've got your answer, counsel.

3 **Q. Is that a fair reading of paragraph H?**

4 MR. JACKSON: Same objection.

5 A. As I've mentioned once before, I would have  
6 to go through this with my attorney to understand the  
7 question that you're asking, and at this point --

8 **Q. Can't do it without going -- with your  
9 attorney here?**

10 A. At this point, I'm not an attorney.

11 **Q. Okay, I understand that. I just --**

12 A. I'm not an attorney; I'm not going to  
13 pretend or play to be an attorney, and so -- I'm not  
14 trained in that field, and so I would want to make  
15 sure that I understand the question that you're  
16 asking. You're asking me for a legal opinion.

17 **Q. I'm not, but...**

18 A. Well, it feels like that.

19 **Q. That's a fair answer --**

20 A. Okay.

21 **Q. -- that you are unable to do it without  
22 conferring with your lawyer. Is that --**

23 MR. JACKSON: He already answered the  
24 question.

25 **Q. Is that -- is that a fair -- is that where**

1 **Q. I don't have any problem with that. I just  
2 want to know if that's where we are. You'd rather  
3 talk to your lawyer about that before you made an  
4 opinion?**

5 A. Correct.

6 **Q. All right, fair enough. Not that hard, is  
7 it?**

8 (Exhibits 5-6 marked.)

9 **Q. (By Mr. Hnasko) Exhibit 5. And I want to  
10 simultaneously hand you Exhibit 6.**

11 **Could you can identify Exhibits 5 and 6,  
12 please?**

13 A. So Exhibit Number 5 is the new  
14 Anti-Harassment Policy dated January 15, 2018, and  
15 Exhibit 6 is the No Harassment Policy dated May 2,  
16 2008.

17 **Q. And is it your understanding that the No  
18 Harassment Policy, Exhibit 6, was in effect when you  
19 entered the legislature in 2013?**

20 A. Please restate the question.

21 **Q. Was it your understanding that the No  
22 Harassment Policy, Exhibit 6, was in effect when you  
23 entered the legislature in 2013?**

24 A. When I entered the legislature in 2013, we  
25 did have an ethics training, and I'm not sure if we

1 **we are? You're not going to do it because you've got  
2 to confer with Mr. Jackson on the interpretation to  
3 make sure that he concurs?**

4 MR. JACKSON: Objection.

5 A. I feel like I've answered the question  
6 already.

7 **Q. Well, you have. This is a different  
8 question to end this line of questioning. You're not  
9 able to answer the questions because you'd have to  
10 confer with a lawyer first?**

11 MR. JACKSON: Objection. That's not what  
12 he said.

13 A. I didn't say that I'm not able. I said I  
14 would like to get opinions of understanding  
15 completely.

16 **Q. Okay. Okay, fair enough. I don't want to  
17 say you're not able, then. I thought you said that.**

18 A. No, I didn't say I'm not able.

19 **Q. Would it be fair to say you would prefer  
20 not to answer the question until you had the ability  
21 to confer with an attorney and get some legal  
22 interpretation on that?**

23 A. Yes, I think it would be highly --

24 **Q. Okay.**

25 A. -- unacademic to --

1 had to sign off on this, and this may be -- may have  
2 been part of it. I don't know.

3 **Q. So you don't know whether this was in  
4 effect when you were in the legislature in 2013?**

5 A. I see a date on the document, and so I can  
6 only assume it is, unless it was changed.

7 **Q. All right. I'd like you to look at the  
8 examples of sexual harassment in Exhibit 6. One of  
9 the categories, verbal, nonverbal and physical. And  
10 why don't you read that.**

11 A. You want me to read out loud?

12 **Q. No, just read it to yourself.**

13 A. Oh, okay. Okay.

14 **Q. And if you would, please, go over to  
15 Exhibit 5 which you identified as the Anti-Harassment  
16 Policy dated January 15, 2018.**

17 A. Um-hum.

18 **Q. On page 2 in the middle, there are examples  
19 of conduct that may constitute sexual harassment,  
20 and, again, there are three categories, they're  
21 verbal harassment, nonverbal harassment and physical  
22 harassment. Do you see those?**

23 A. I do. Give me a chance to read them.

24 **Q. Sure, read them.**

25 A. Okay.



1 **Q. All right, I'm not asking you to put a**  
2 **microscope on the language and point out different**  
3 **words that are used, but in the examples of verbal,**  
4 **nonverbal and physical harassment set forth in both**  
5 **of these policies, do you see any substantive**  
6 **difference between the two or are they generally the**  
7 **same?**

8 A. This may take a little bit of time here.

9 **Q. Well, just read those three, verbal,**  
10 **nonverbal and physical.**

11 A. I did read them, but if you're trying to  
12 ask -- if I understand you correctly, you're trying  
13 to ask me if I see much difference or --

14 **Q. Any substantive difference.**

15 A. Okay.

16 **Q. Certainly the language is going to be**  
17 **different, but in your estimation as a sitting**  
18 **legislator, is there anything prevented in 2018 that**  
19 **was not prevented in 2008?**

20 A. So your question is do I see much  
21 difference?

22 **Q. Any substantive deference based on your**  
23 **perception.**

24 A. At this point, I don't -- I don't see any  
25 substantial, but I haven't taken the time to analyze

1 **Q. Um-hum.**

2 A. And so I do see some substantial  
3 differences in the verbal harassment area. I see  
4 repeated requests for a date --

5 **Q. Okay.**

6 A. -- but I don't see that language in policy  
7 dated May 2, 2008.

8 Also, nonverbal, I see other conditions  
9 that have been added: Any graphic material,  
10 calendars --

11 **Q. Okay.**

12 A. -- posters or cartoons.

13 **Q. All right.**

14 A. And then, also, in the physical, I see many  
15 others that are added, as well, such as -- well, I'd  
16 have to go through exactly. I started to underline a  
17 few of these so that I could get a -- compare them  
18 one for one, but there is about maybe four or five  
19 other conditions --

20 **Q. Okay.**

21 A. -- added.

22 **Q. Maybe give me some examples.**

23 A. I see kissing, I think.

24 **Q. Kissing.**

25 A. I see something like fondling.

1 it completely.

2 **Q. I just wanted those, the examples,**  
3 **compared, the examples of verbal, nonverbal, and**  
4 **physical harassment.**

5 A. I think I just answered the question.

6 **Q. All right.**

7 MR. HNASKO: You guys want to take a little  
8 break? It's been an hour.

9 MR. JACKSON: Sure.

10 (Recess was taken from 10:49 to 11:02 a.m.)

11 MR. HNASKO: Back on the record.

12 (Exhibit 7 marked.)

13 **Q. (By Mr. Hnasko) Let me hand you Exhibit 7,**  
14 **Mr. Trujillo.**

15 A. Mr. Hnasko --

16 **Q. Yes.**

17 A. -- you know, as you asked me is there  
18 substantial differences, if we can go back, because  
19 I --

20 **Q. Sure.**

21 A. -- actually now had a couple more  
22 minutes --

23 **Q. Okay.**

24 A. -- in the event of asking me to compare  
25 several paragraphs all at once.

1 **Q. I assume that's unwanted kissing, right --**

2 A. Well --

3 **Q. -- wouldn't you say?**

4 A. I can't say. I can just tell you what I'm  
5 reading right here.

6 **Q. Well, I'm not -- okay, go ahead.**

7 A. Well, you asked me. May 2nd, it says --  
8 policy, under physical says, under the subtitle  
9 "Examples of Sexual harassment: Physical - touching,  
10 pinching, hugging, patting and brushing up against  
11 someone."

12 And under the new Anti-Harassment Policy  
13 dated January 15, 2018, physical harassment is  
14 described as "unwelcome physical contact, such as  
15 touching, tickling, pinching, hugging, patting,  
16 cornering, kissing, fondling." So the unwelcome  
17 physical contact is stated in the new policy.

18 **Q. Okay, so, but my real question wasn't a**  
19 **language difference, it was really the substantive**  
20 **difference. So one way we can slice this,**  
21 **Mr. Trujillo, is ask you some questions about that.**  
22 **You said multiple requests for a date is now frowned**  
23 **upon under the new policy; is that correct?**

24 A. I'm just reading what the policy says.

25 **Q. Well, I understand.**



1 A. The policy says "Verbal harassment -  
2 requests or demands for any type of sexual favor;  
3 repeated requests for a date," yes.

4 **Q. Okay, so, but you're not suggesting under  
5 the old policy in 2008 that repeated demands for  
6 sexual favors, would be --**

7 A. I'm not suggesting anything.

8 **Q. -- would be permissible under that policy?**

9 A. I'm not suggesting anything.

10 **Q. You're not suggesting that, are you?**

11 A. That it's allowed?

12 **Q. Yeah, under the old policy, that repeated  
13 requests for sexual favors would be allowed?**

14 A. Yeah, I don't believe so.

15 **Q. All right. And submission of graphic  
16 material, although mentioned in the new policy, but  
17 not in the old, you don't think that would be allowed  
18 in the old policy, do you?**

19 A. I'm not here to -- I mean, you'd have --  
20 you've given me this document, and --

21 **Q. Well, I'm not asking you about that. I'm  
22 asking in general. Do you think it would be okay in  
23 2008 to start sending around graphic material of a  
24 sexual nature?**

25 A. Send around graphic material, no.

1 e-mail before?

2 A. I'm following my counsel's recommendation.

3 **Q. And you're not going to answer that  
4 question.**

5 **All right, did you participate in the  
6 preparation of this e-mail?**

7 MR. JACKSON: Same objection; same  
8 instruction.

9 **Q. Where did Martha Trujillo get her  
10 information to put in this e-mail?**

11 MR. JACKSON: Same objection, same  
12 instruction.

13 **Q. And to whom was this e-mail disseminated?**

14 MR. JACKSON: Same objection; same  
15 instruction.

16 **Q. Did you direct Martha Trujillo to  
17 disseminate this e-mail to the entire House of  
18 Representatives?**

19 MR. JACKSON: Same instruction; same  
20 objection.

21 **Q. And, finally, do you recognize Exhibit 7?**

22 MR. JACKSON: Same objection; same  
23 instruction.

24 MR. HNASKO: Okay, good luck with that.  
25

1 **Q. All right. Let's go -- let's move on.  
2 I handed you Exhibit 7, which is an e-mail  
3 dated October 7, 2018, again from Martha Trujillo.  
4 Have you seen this e-mail before?**

5 MR. JACKSON: I'm going to make the same  
6 objections that I made before. Instruct the witness  
7 not to answer any questions with regard to Martha  
8 Trujillo.

9 MR. HNASKO: I'm sorry, I couldn't hear the  
10 last part?

11 MR. JACKSON: I'm going to make the same  
12 objection I made earlier regarding Martha Trujillo  
13 and instruct the witness not to answer any questions  
14 relating to Martha Trujillo --

15 MR. HNASKO: Okay, well, you can --

16 MR. JACKSON: -- on the same grounds.

17 MR. HNASKO: Let me make my offer of proof,  
18 and then you can object, it will take about a second,  
19 and then we'll have a record on that.

20 **Q. (By Mr. Hnasko) Mr. Trujillo, have you seen  
21 this e-mail before?**

22 MR. JACKSON: Same objection, same  
23 instruction.

24 **Q. And you're following your counsel's  
25 instructions not to answer whether you have seen this**

1 (Exhibit 8 marked.)

2 **Q. (By Mr. Hnasko) Let me hand you what will  
3 be marked as Exhibit 8 -- excuse me -- 8, yes.**

4 **And before I hand you that, let me just ask  
5 you generally, are you aware of any response by the  
6 hearing subcommittee to this e-mail that was  
7 purportedly sent my Martha Trujillo?**

8 A. I received an e-mail from Joseph, who is in  
9 the -- is in the Speaker's office, Speaker Egolf's  
10 office, that was sent out. I was one of all the  
11 Democratic caucus copied on the letter by the  
12 co-chairs instructing or -- I shouldn't say  
13 instructing, but letting -- informing the House of  
14 Representatives and the Senate that the committee is  
15 not using the letter as -- not using the letter  
16 for --

17 **Q. (Handing the witness Exhibit 8.)**

18 A. There you go. So I did get this letter.

19 **Q. That's Exhibit 8?**

20 A. Yes.

21 **Q. How did you receive a copy of this letter?**

22 A. Through Joseph, I forget his last name,  
23 from the Speaker's office.

24 **Q. All right. And you see the letter is  
25 signed by D. Wonda Johnson and Gail Armstrong as**



1 **co-chairs of the interim Legislative Ethics Hearing**  
2 **Subcommittee?**

3 A. I see it.

4 **Q. All right. And what did you do, when you**  
5 **received a copy of this letter, in response to it?**

6 A. I didn't do anything.

7 **Q. Did you have any discussions with members**  
8 **of the House of Representatives, any members of the**  
9 **House, about this particular letter?**

10 A. Not that I recall.

11 **Q. What was your reaction to the conclusions**  
12 **by the co-chairs --**

13 A. I didn't --

14 **Q. -- that the letter --**

15 A. I didn't have any conclusions.

16 **Q. -- concluded, "Such erroneous**  
17 **characterization of the current process as described**  
18 **in the letters, and the use of innuendo, personal**  
19 **attacks and falsehoods..." Did you have any reaction**  
20 **to that conclusion?**

21 A. I didn't. I didn't -- no.

22 **Q. Did you contact any members of the**  
23 **leadership referenced in this letter, including**  
24 **Speaker Egolf, Minority Leader Gentry, Majority**  
25 **Leader Stapleton, Majority Leader Ingle, Senate Pro**

1 **with Carl Trujillo over the past few months, but they**  
2 **were generally limited to Carl saying that the**  
3 **allegations are ridiculous and false."**

4 **Is that a true statement, that she has had**  
5 **only a couple of conversations with you over the past**  
6 **few months?**

7 MR. JACKSON: I'll let you answer that  
8 question.

9 A. I have -- there has been many people that  
10 have been concerned, numerous people that have been  
11 concerned, hundreds of people that have been  
12 concerned over these allegations, and I've repeatedly  
13 stated that they're false, and I can't tell you how  
14 many times I've had conversations, with who, and  
15 when, because there's been that many.

16 **Q. I want to know specifically about Martha**  
17 **Trujillo, and remind you that you are under oath.**  
18 **Did you have more than a few conversations with**  
19 **Martha Trujillo for the few months preceding**  
20 **October 12, 2018?**

21 A. Preceding?

22 **Q. Yes, prior to October 12, 2018.**

23 A. I've had multiple conversations with  
24 multiple people, which include Martha Trujillo, as  
25 far as stating that these allegations are false and

1 **Tempore Papen and Majority Leader Wirth, did you have**  
2 **contacts with any of them about this letter?**

3 A. No.

4 (Exhibit 9 marked.)

5 **Q. (By Mr. Hnasko) Let me hand you Exhibit 9.**  
6 **It's a series of e-mails from one of your counsel,**  
7 **Eric Loman, exchanged with me.**

8 **My e-mail dated October 19th, which is**  
9 **the second e-mail on that page -- do you see that?**

10 A. Um-hum.

11 **Q. -- indicating "Thank you for agreeing to**  
12 **produce Martha Trujillo for deposition. I would like**  
13 **to take her deposition on November 8..." which is**  
14 **today. Do you see that reference?**

15 A. I see that reference.

16 **Q. Okay, flip the page, if you would, please.**

17 A. (Witness complied.)

18 **Q. Another e-mail from Mr. Loman stating that**  
19 **"With respect to Martha Trujillo..." do you see that**  
20 **reference?**

21 A. Yes, I see that.

22 **Q. He says, "...I can produce her, but I'm not**  
23 **sure she's worth anyone's time. I have spoken with**  
24 **her and she has no direct knowledge of Ms. Bonar's**  
25 **allegations. She's had a couple of conversations**

1 that I felt that the process was very unfair.

2 **Q. If we look at this e-mail, I'm just trying**  
3 **to get an understanding of the correctness of this**  
4 **statement where Mr. Loman reported, "She has had a**  
5 **couple of conversations with Carl Trujillo over the**  
6 **past few months." Is that an accurate statement?**

7 A. As I mentioned, she has been -- no, she has  
8 been part of many conversations.

9 **Q. How many?**

10 A. It's been with many people.

11 **Q. Over more than 10?**

12 A. Oh, yeah. Yes.

13 **Q. More than 20?**

14 A. Are you talking people?

15 **Q. No, I'm talking Ms. Trujillo.**

16 A. Oh.

17 **Q. I'm only limiting it to Ms. Trujillo. I'm**  
18 **not asking -- I'm not fishing for the world. I just**  
19 **want to know about her.**

20 A. I can't say how many. I don't know.

21 **Q. But more than a couple?**

22 MR. JACKSON: No.

23 A. I mean, you can define it more than a  
24 couple. I don't know.

25 **Q. Let's define a couple as two. I just**



1 want -- I'm not suggesting anything nefarious on  
2 Mr. Loman's part. He's reporting to me information  
3 he has. I just want to know if that information is  
4 accurate. And you're under oath, so here's your  
5 chance to tell me whether what Mr. Loman reported to  
6 me was accurate.

7 A. So if the -- your question, a couple  
8 conversations, I've had more than a couple  
9 conversations with Martha, but they weren't about the  
10 allegations of this nature.

11 Q. Okay, I'm not worried -- interested in  
12 conversations with your aunt about Sunday dinner or  
13 something, okay. I'm only interested in this  
14 proceeding.

15 A. As I've stated here, there's been multiple  
16 conversations with multiple -- people were concerned.  
17 People -- I didn't do this. People, I believe,  
18 genuinely believe that. And people would ask me all  
19 the time, and up to the point of that they asked me  
20 if this happened, and I said no. And so if you -- if  
21 you -- if you're asking me if I had conversations  
22 with Martha denying that this happened, yes.

23 Q. And I want to know how many conversations  
24 you have had with Ms. Trujillo about this matter and  
25 whether Mr. Loman's statement that there have only

1 Q. So if you were to bookend it, it would be  
2 between three and ten?

3 A. You're asking me for something that -- I've  
4 spoken to multiple people over the course of the last  
5 several months, and when I say multiple, I'm talking  
6 hundreds of people, so to try and ask me to quantify  
7 one conversation with one person how many times on  
8 these allegations, I can't -- I can't give you those  
9 numbers.

10 Q. I'm not asking for a particular number. I  
11 totally understand you're not able to say it was 11  
12 times or 8 times, I just want to know the general  
13 bookends of your conversations about this matter with  
14 Ms. Trujillo, and I think you fairly said it could  
15 have been ten, it was more than two, so I'm just  
16 saying it was between three and ten, is that a fair  
17 bookend?

18 A. It's more than two, and I can't say if  
19 it's -- it could just be a couple more than that.  
20 I'd have to -- I just can't recall.

21 Q. Okay, fair enough.

22 Let me ask you a question about the  
23 Speaker's fund. What's your understanding of the  
24 Speaker's fund? How does it work?

25 A. Speaker's fund. It's a PAC, a political

1 been a couple and that she has no direct knowledge of  
2 the matter is accurate.

3 A. So as you know, you're investigating --  
4 your report was public, so many people have read it,  
5 including Martha Trujillo, so the idea that you may  
6 say how does she know this information, she can get  
7 it from public record.

8 Q. Again, I'm going back to the quantity of  
9 conversations you have had with your aunt, Martha  
10 Trujillo, about this matter. Mr. Loman reported that  
11 she had a couple of conversations over the past few  
12 months. I want to know if you had more than a couple  
13 of conversations with Ms. Trujillo.

14 A. If we're quantifying more than two, I would  
15 say yes, but I don't know -- I can't -- it's not  
16 dozens, it's not over ten.

17 Q. Somewhere between three and ten?

18 A. Could be. Could be more than two.

19 Q. Is your recollection today that it was more  
20 than two?

21 A. Yes.

22 Q. Is your recollection today that it was at  
23 least ten?

24 A. No, I can't recall that, no. I don't  
25 believe so.

1 action committee, and my understanding of it is just  
2 like any other PAC, you try and get money into it  
3 and -- and use it for elections.

4 Q. But do you understand the Speaker's fund in  
5 New Mexico, how that -- how that is supposed to work?

6 A. No. What I do know is, as a Speaker, you  
7 have a PAC and you try and hustle money to it, and  
8 you use it to -- as you see fit.

9 Q. Is the intention to use it for democrat  
10 candidates who are running in opposed House races  
11 with republicans?

12 A. I can't speak for what the Speaker's intent  
13 is of that money.

14 Q. Have you ever been a beneficiary of the  
15 Speaker's fund in terms of having the money from the  
16 Speaker's fund, the PAC, support any of your  
17 campaigns?

18 A. I would have to go back and look at my  
19 campaign records --

20 Q. Yeah.

21 A. -- but up to this point -- actually, I -- I  
22 do remember getting a one contribution from the  
23 Speaker, but I think it was from his own -- his own  
24 campaign account. I can't verify that, I would have  
25 to go look, but --



1 **Q. I understand.**

2 A. -- as far as -- as far as I can recall, it  
3 was only -- I haven't gotten anything from the  
4 Speaker's PAC.

5 **Q. You had some earlier complaints,  
6 Mr. Trujillo, that you didn't feel the investigation  
7 was prompt.**

8 A. (Witness nods head.)

9 **Q. Let me get your understanding of the  
10 timeline of the investigation and how it unfolded.**

11 A. Oh, give my --

12 **Q. Yeah, I want your understanding.**

13 A. -- interpretation. I think it's been  
14 stated very succinctly in our evidence binder. As  
15 you know, the allegation came in -- or the open  
16 letter got filed May 2nd.

17 **Q. Um-hum.**

18 A. As far as I can tell, it got sent -- put on  
19 a website and sent to multiple news media outlets. I  
20 did -- as stated in the binder, I did receive a call  
21 from -- or there was an exchange, I forget how it  
22 went, an exchange between Speaker Egolf and myself.  
23 He said that he would have to take this and move it  
24 to the next stage. I asked him if a complaint was  
25 filed. He said no, and he said they would convey --

1 that the media was going to continue to embarrass us,  
2 which they did. That prolonged through the weekend,  
3 and Monday I get a call and it's -- by Representative  
4 Rodella after Miguel Garcia wrote a letter basically  
5 saying in support, signed -- by two other legislators  
6 signed, that he believed Ms. Bonar and I should  
7 resign.

8 And, at that point, Representative Rodella  
9 must have called Brian Egolf and said, you now have  
10 four members that have come out without any evidence,  
11 without any due process, and at that point  
12 Speaker Egolf must have told Deputy Rodella --  
13 Representative Rodella that there was a formal  
14 complaint filed. Representative Rodella called me  
15 thereafter on that Monday night and said, Carl,  
16 there's a formal complaint filed. And I said, well,  
17 at least I finally -- at least it seems like the  
18 process is being followed. I said, at least maybe  
19 I'll, you know, get a little more details.

20 And so I called Speaker Egolf the very next  
21 morning at 8:00 a.m., or I could look back at the  
22 phone records, asked him, Speaker, I guess formal  
23 complaints -- no, let me back up. I text, and it's  
24 part of my evidence, I text Raul Burciaga, head of  
25 legislative council, because it says in policy that

1 convene the members, the majority, minority leader  
2 and outside counsel, and he said he would get it done  
3 by the next day, and because there wasn't a complaint  
4 filed as required, that more than likely they would  
5 just dismiss it. He was going to ask Ms. -- the  
6 attorney, her name was --

7 **Q. Ives?**

8 A. -- Ives to contact Mr. Monogle and find out  
9 if they were going to file a formal complaint. I  
10 reached out to him, and it's in the evidence binder,  
11 the very next morning to say that I had gone back and  
12 looked at all my electronic format, electronic stuff,  
13 and was just -- it's in the evidence binder,  
14 everything I submitted.

15 I called him at 5:30 -- 5:30 that night  
16 where he was attending a fund-raiser on Animal  
17 Protection Voters that night and asked him if they  
18 had convened because reporters were calling me  
19 constantly to find out what was going on with the  
20 allegations, and he said that they hadn't had a  
21 chance to because some of them were busy, and he said  
22 that maybe they would have a chance to convene by  
23 next Monday or Tuesday.

24 I felt at that point that without a  
25 complaint filed and without -- with that uncertainty,

1 it has to go through legislative council. I text him  
2 at 7:00 a.m. and he responded, and asked if a formal  
3 complaint had been filed, and he said no, and so that  
4 was --

5 **Q. And just let me -- I don't mean to  
6 interrupt your narrative, but at that point you're --  
7 you're believing that there needs to be a formal  
8 complaint, is that fair, in order to get the process  
9 moving?**

10 A. If I go back to the policy and I look at  
11 that section, the other section which refers back to  
12 the anti-harassment policy, yes.

13 **Q. Legislative council policy 16?**

14 A. But it also refers back to -- I mean, we  
15 can go through it and read it, or we can have this  
16 interpretation later. I'm giving you the --

17 **Q. I understand. I just want to know what  
18 your thought process was, and, at that point, you're  
19 of the impression or understanding that a formal  
20 complaint must be filed?**

21 A. I'm under the impression because when I  
22 called Speaker Egolf and we spoke on that day, and I  
23 asked him if a formal complaint had been filed and he  
24 said no, and he said he was going to instruct  
25 Patricia Ives to go out to Mr. Monogle and ask if



1 they were going to file a formal complaint, when the  
2 Speaker of the House is telling you this, then you're  
3 already under the assumption that this is how he's  
4 interpreting this policy.

5 **Q. Okay. So what happens next?**

6 A. So I'm under the assumption that this is  
7 required and he's convening this -- these four  
8 members -- or two members and outside counsel, which  
9 doesn't take place, and he informs me back on  
10 May 3rd that everybody was busy, even though this,  
11 I believe, you know, could have been done through a  
12 teleconference, but point being is that he mentioned  
13 to me that they might be -- they would probably  
14 convene Monday or Tuesday.

15 So I'll get -- so during that time there  
16 was a lot of -- an article every single day in the  
17 media, based on the open letter and the  
18 interpretation of the media of the open letter, and  
19 Monday comes -- and I'll get back to Monday -- where  
20 the next thing I hear is a call from Representative  
21 Rodella, as I stated earlier, with the facts that she  
22 called Speaker Egolf to ask him why these members  
23 were coming out with no due process and no -- in her  
24 opinion, and no evidence and asking a member to  
25 resign in the caucus.

1 a formal complaint had been filed. And so then he  
2 called me back a half hour later, or 20 minutes  
3 later, and says, oh, I must have misunderstood, there  
4 was no formal complaint filed.

5 And so, at that point, I text Raul Burciaga  
6 at 9:00 and I said, please let me know if a formal  
7 complaint gets filed.

8 **Q. Um-hum.**

9 A. At 10:00, I text him again. He responds  
10 right away, he says no -- no formal complaint.  
11 10:00 comes, he says no formal complaint. I said, I  
12 hate to bother you, Mr. Director, but -- you know, I  
13 don't want to bother you every hour -- at this point,  
14 let me back up a little bit, Representative Rodella  
15 told me that Speaker Egolf told them they were going  
16 to meet at 12:00 noon. So Monday night --

17 **Q. This is the Monday --**

18 A. Monday night --

19 **Q. -- after May 2nd?**

20 A. Monday night was the first time that I knew  
21 that they were going to be -- or that I realized they  
22 were going to be meeting at noon on Tuesday.

23 **Q. And did they go ahead and meet?**

24 A. And so I text -- we'll get back to Tuesday,  
25 the 8th, May 8th, and at 11:00 -- somewhere --

1 **Q. So I'm trying to get to the timeline. What**  
2 **happened next as you understood it?**

3 A. So here we go. And so then she calls me.  
4 I'm under the impression now, because she tells me,  
5 that Speaker Egolf said a formal complaint has been  
6 filed. And so as I mentioned, I said, well, at least  
7 maybe I see some details of it, because right now all  
8 I know is an open letter that I've been blasted in  
9 the media.

10 **Q. Right.**

11 A. I call Speaker Egolf in the morning and --  
12 well, I text Raul Burciaga at 7:00 a.m., and it's  
13 part of my evidence record, basically, are you -- has  
14 a formal complaint been filed? He says no, he says,  
15 but let me get into the office at 8:00 a.m. and I'll  
16 let you know. He text me at 8:00 a.m. and said no  
17 complaint has been filed.

18 At this point, I call Speaker Egolf at 8:30  
19 on my way dropping my son off at school, and I said,  
20 Mr. Speaker, I said, you mentioned to Representative  
21 Rodella yesterday that a complaint's been filed, and  
22 I spoke to Raul Burciaga and he says no complaint's  
23 been filed, in which case Speaker Egolf said, well,  
24 let me check, let me check, I thought a formal  
25 complaint had been filed, I was under the impression

1 somewhere -- there's several -- several text messages  
2 between me and Raul Burciaga, I can't state the exact  
3 times, I'd have to go back and refer to it, but I do  
4 have the hard copies, but there is these text  
5 messages exchanged, and he says, no formal complaint,  
6 no formal complaint, and then finally at 11:00  
7 something, close to noon, he sends me a text and  
8 says, look at your e-mail. So I go and I look at my  
9 e-mail, and this is where Mr. Monogle has now sent  
10 the same exact -- at least to me it looks like the  
11 same correspondence that they had sent in the open  
12 letter to the media --

13 **Q. Um-hum.**

14 A. -- saying please use this -- I'm just --  
15 I'd have to go back and reference the e-mail, but  
16 please use this as a formal complaint.

17 Hence, they meet, Speaker Egolf calls me at  
18 about 1:32 or -- I don't know, sometime, I'd have to  
19 go back and reference. He calls me, tells me that  
20 they've decided that there was enough information and  
21 they're going to move it on to the subcommittee. He  
22 tells me that -- who's on the subcommittee. He tells  
23 me that he will make sure that this whole  
24 investigation gets done two weeks -- within two weeks  
25 before the election.



1 **Q. Okay, can I just stop there. That would**  
2 **have been on May 8th --**

3 A. Correct.

4 **Q. -- where you're informed that they're**  
5 **moving the matter to the --**

6 A. Yes, correct.

7 **Q. -- investigative subcommittee?**

8 **And then, thereafter, special counsel is**  
9 **hired, right?**

10 A. I don't know when you were hired. You'd  
11 have to inform me of when you were hired.

12 **Q. Okay, so you don't have any knowledge of**  
13 **that date.**

14 **And then the investigation proceeds**  
15 **correct, and the report is issued, to your**  
16 **understanding on?**

17 A. July 27th.

18 **Q. July 27th. So special counsel is hired**  
19 **after May 8th, it would have to be, correct,**  
20 **because they didn't -- there wasn't -- there wasn't**  
21 **any decision to refer it until May 8th?**

22 A. I'd have to check with legislative council,  
23 but...

24 **Q. Okay, so we have essentially May, June,**  
25 **July, right, less than three months?**

1 you he's going to get it done in two weeks before an  
2 election, it -- at that point, there's some  
3 expectations set.

4 **Q. Okay. All right, so I just want to**  
5 **understand your -- your various statements that you**  
6 **did not believe the investigation was prompt enough**  
7 **and do I understand correctly that it hinges not on**  
8 **the time it took to do the investigation, but rather**  
9 **on the Speaker's comment to you that he would try to**  
10 **have it done in two weeks?**

11 A. If you're asking me -- please restate the  
12 question.

13 **Q. Well, I'm just trying to get a handle on**  
14 **the basis for your various statements throughout this**  
15 **proceeding that the investigation has not been**  
16 **prompt.**

17 A. I think what my earlier statement is, that  
18 I had an expectation by the Speaker of the House  
19 telling me that it would be done in two weeks.

20 **Q. Fair enough, and that's what -- I'm just**  
21 **trying to understand, myself, because to me it seemed**  
22 **like rocket speed, but if you -- if you -- if that**  
23 **statement is based on the Speaker's statement to you**  
24 **that it would be done in two weeks, I just want to**  
25 **know that.**

1 A. (No audible response.)

2 **Q. And I want to know, based on your**  
3 **experience in the legislature, has any ethics**  
4 **investigation been concluded in a three-month period**  
5 **to your knowledge?**

6 A. I don't even know if -- I don't know. I  
7 couldn't give you that information.

8 **Q. Well, you remember the Senator Griego**  
9 **investigation, correct? You remember hearing about**  
10 **that, Phil Griego?**

11 A. Yes, I remember hearing about that.

12 **Q. Do you have any understanding how long that**  
13 **took while the legislature was in session?**

14 A. What I remember -- yeah, I don't know.  
15 What I remember is we're busy during the House, and  
16 something came up and he resigned, and that's -- the  
17 rest is what I heard in the media, but I can't  
18 recall.

19 **Q. Do you consider the referral -- the time**  
20 **between the referral on May 8th from leadership to**  
21 **the investigative subcommittee and the time special**  
22 **counsel issued its report on July 27th to be an**  
23 **inordinate length of time to conduct an**  
24 **investigation?**

25 A. Well, when the Speaker of the House tells

1 A. Yes.

2 **Q. Okay.**

3 A. Yes.

4 **Q. And that's really the sum and substance of**  
5 **the entire position that, in your view, the**  
6 **investigation was not prompt, the representation to**  
7 **you by the Speaker that it would be done in two**  
8 **weeks?**

9 A. You asked about do I think this was  
10 politically motivated. I think this --

11 **Q. Well --**

12 A. -- lends -- I think this lends proof to it.  
13 I mean --

14 **Q. Okay, well, tell me -- tell me why.**

15 A. Well, I think that, you know, it comes out  
16 two weeks and you get promised it's going to be done  
17 before the election.

18 **Q. So, again, my question goes back to who was**  
19 **politically motivated. Are you now suggesting that**  
20 **the Speaker of the House was politically motivated to**  
21 **drag this out past the election so that you would**  
22 **suffer?**

23 A. What I can say now, as you bring back this  
24 and I look back, you know, the -- the Julianna Koob  
25 and -- after we obtained the documents from this



1 process now and your recommendation and findings, did  
2 I even have any knowledge of -- that -- what's  
3 interesting is I didn't even know Julianna Koob had  
4 filed a complaint until I read it on the last page of  
5 your findings on the 27th, and when I find that  
6 there was several correspondence between APV and  
7 Julianna Koob back as early as January was some of  
8 the reason why I believe she was -- or there was --  
9 there is a potential for her being involved.

10 **Q. All right, Julianna Koob?**

11 A. Yes.

12 **Q. Again, I was focusing on the Speaker of the**  
13 **House, because we went through the timeline and you**  
14 **indicated that that's another reason why you believe**  
15 **it was politically motivated.**

16 A. And I think if you -- going through the  
17 documents that we've submitted and the arguments that  
18 we've submitted through my attorneys, those  
19 documents, I believe -- I believe -- have  
20 consistently shown that the process hasn't been  
21 followed, and so, with that said, I -- the process  
22 wasn't followed, I feel like it wasn't followed.

23 **Q. All right. How would you like the process**  
24 **to have been?**

25 A. Okay, fair question. I think, first of

1 **made the allegations public, correct?**

2 A. That is correct. But to continue down a  
3 path doesn't make it correct if the policy says that  
4 confidentiality must be kept. It doesn't...

5 **Q. Any other aspects of the process you would**  
6 **have liked to have seen unfold differently than**  
7 **confidentiality?**

8 A. Yes, and I think they're all stated in our  
9 binder, our evidence binder and the arguments that  
10 have been made thus far, and so I --

11 **Q. Which -- why don't you summarize for me**  
12 **what aspects of the process you believe were not fair**  
13 **and should have been different.**

14 A. Well, we got into these semantics earlier,  
15 and so I think I'd need to refer back to the  
16 documents of -- that we've laid out to give you very  
17 specifics like you're asking for, which I cannot  
18 give. If you gave me access to the e-mails that went  
19 back and forth between my attorney, Randi Valverde,  
20 in the -- in the investigation stage, I could  
21 specifically state these to you right now.

22 **Q. Okay, I'll give them to you. Let me hand**  
23 **you Exhibits 12 and 13.**

24 (A discussion was held off the record.)  
25

1 all, confidentiality should have never been broken,  
2 ever. Laura Bonar's attorney -- now she's being  
3 advised by an attorney -- states the new  
4 Anti-Harassment Policy which specifically talks about  
5 confidentiality for both parties. For both parties.  
6 So they knowingly breached that confidentiality. The  
7 question is why.

8 **Q. Okay. How else would you -- in a perfect**  
9 **world, how would you like to see the process go? You**  
10 **mentioned you would like it to have remained**  
11 **confidential. What else?**

12 A. Confidential in many steps. Not just one.  
13 It was breached in many steps.

14 **Q. Okay.**

15 A. Not only by Ms. Bonar, but by legislative  
16 council, by other representatives, by writing letters  
17 and sending them to the media.

18 **Q. And how did the legislative council, in**  
19 **your view, breach confidentiality?**

20 A. By issuing press releases -- press release  
21 on May 8th.

22 **Q. Indicating that there would be an**  
23 **investigation?**

24 A. Correct.

25 **Q. And, by that time, Ms. Bonar had already**

1 (Exhibits 11-12 marked.)

2 **Q. (By Mr. Hnasko) I'm handing you Exhibits 10**  
3 **and 11. Is Exhibit 10 a series of e-mails?**

4 A. Exhibit 10 is a series of e-mails, yes.

5 **Q. All right. Are those some of the e-mails**  
6 **you were referring to sent by your prior attorney,**  
7 **Ms. Valverde?**

8 A. What I can answer is there was so many  
9 e-mails sent back and forth that I can't --

10 **Q. Agreed.**

11 A. -- say that this is all of them or not.

12 **Q. Yeah.**

13 A. What I'd like to state for the record,  
14 though, is that I thought I'm here for you to find  
15 whether these allegations are true or not, and we  
16 have spent most of the morning going over the policy  
17 and everything else when, ultimately, as I understand  
18 it, you're going to be bringing forward two issues  
19 that you found to be probable cause on, and I still  
20 stand by these statements. I mean, I could read the  
21 whole statement.

22 **Q. No, you don't need to.**

23 A. Oh, okay.

24 **Q. I'm just trying to get an idea what you're**  
25 **going to present at the hearing, Mr. Trujillo.**



1 That's why we're going through the exercise. But I  
2 just want to know, with the understanding that  
3 this -- I'm not representing this is a complete  
4 package of the e-mail communications between me and  
5 your former attorney, Ms. Valverde, but it is some of  
6 them, correct?

7 A. Okay.

8 Q. All right. And then this letter, I think  
9 Ms. Valverde wrote on June 15, 2018, which is  
10 Exhibit 11, states some of -- some of the objections  
11 you had to the procedure, correct?

12 A. What it states is my counsel's --

13 Q. View of it.

14 A. -- view of it.

15 Q. All right. And on page 2 of the letter,  
16 which is Exhibit 11, I don't need you to go through  
17 everything, I just want to know, in paragraph 2 she  
18 states that the investigation into Ms. Bonar's open  
19 letter has not been prompt. And we've discussed  
20 that, correct, because --

21 A. Where are you reading that at?

22 Q. On page 3 of --

23 A. Oh, page 3.

24 Q. Page 3, I'm sorry. Page 3 of her letter  
25 dated June 15, 2018. "Has not been prompt," do you

1 A. Yes.

2 Q. All right. And who else besides  
3 Speaker Egolf voted affirmatively to send the matter  
4 to investigation?

5 A. All she told me was Speaker Egolf. That's  
6 the only knowledge I have.

7 Q. You don't have knowledge of anyone else?

8 A. No.

9 Q. And when did Representative Stapleton  
10 contact you?

11 A. About a day or two days after the -- it was  
12 sent to the subcommittee.

13 Q. Directing your attention to page 4 of this  
14 letter, the second to last paragraph.

15 A. Page 4. So that's one, two -- second to  
16 last -- okay.

17 Q. Yes. Your attorney states, "Significantly  
18 because Ms. Bonar failed to follow applicable  
19 mandatory policy by submitting her allegations under  
20 oath and with reasonable particularity, it follows  
21 that Ms. Bonar's open letter should have been  
22 rejected at the outset, and this process should not  
23 have been initiated against Representative Trujillo."  
24 Do you see that?

25 A. I see that, yes.

1 see that reference?

2 A. I see that.

3 Q. And you're still standing by that objection  
4 to the proceedings?

5 A. What I'm standing by is that her letter was  
6 issued May 2nd, and the -- the legislature or this  
7 leadership made a decision May 8th --

8 Q. Okay.

9 A. -- during the heart of a campaign, a week  
10 before any voting.

11 Q. You made some indication in your various  
12 submittals that you knew who voted among leadership  
13 to send the matter to investigation. To your  
14 knowledge, who did vote to send this to an  
15 investigation?

16 A. Brian Egolf.

17 Q. And how do you know that?

18 A. I know that because I was called by House  
19 Majority Leader Stapleton that was in a meeting to  
20 tell me that her and Nate Gentry argued against it  
21 because they realized that an investigation -- I  
22 don't know all the reasons, but she gave me several,  
23 I don't recall, but she's the one that told me or  
24 informed me that that was the case.

25 Q. She was the one that mentioned that to you?

1 Q. And is that the same term, reasonable  
2 particularity, that we discussed earlier this morning  
3 in the legislative council policy 16?

4 A. My only basis -- this is my attorney's  
5 statement and view, and that's what I stand by.

6 Q. Okay, but do you recall we had that  
7 discussion about reasonable particularity?

8 A. I recall that you kept bringing up the word  
9 and I mentioned to you that --

10 Q. Sure did.

11 A. -- I need to understand how one's  
12 applicable to the other under that policy, and I'm  
13 not an attorney, and I would need to sit with an  
14 attorney to go back and forth so that I could give  
15 you a more defined answer.

16 Q. Do you have to any reason to believe she's  
17 talking about any other term, reasonable  
18 particularity, than the one we discussed this  
19 morning?

20 (Ms. Julie Sakura rejoined the deposition.)

21 MR. JACKSON: Objection, he can't speak for  
22 her, and there's a number of policies --

23 MR. HNASKO: I know he can't speak for her.

24 Q. (By Mr. Hnasko) I want to know if he has  
25 any reason to believe that there's any other



1 reasonable particularity to which your attorney  
2 referred in that letter.

3 A. No, not that I know.

4 **Q. Let me hand you Exhibit 12. Before we do  
5 that, can we just take a short break, I have to use  
6 the restroom, but just to give you guys some timing,  
7 I would anticipate 30 more minutes.**

8 MR. JACKSON: Let's take a break.

9 THE WITNESS: How many more minutes?

10 MR. HNASKO: Thirty. I'm not going to keep  
11 you all day. I could, but I'm not going to.

12 (Recess was taken from 11:43 to 12:07 p.m.)

13 **Q. (By Mr. Hnasko) Mr. Trujillo, I've handed  
14 you Exhibit 12, which is an article from the Santa Fe  
15 New Mexican dated September 30, 2018. And this is  
16 with -- I believe, written by Milan Simonich. You  
17 know him, don't you?**

18 A. I -- do I know him?

19 **Q. Yeah.**

20 A. Yes.

21 **Q. And you requested an opportunity to meet  
22 with him --**

23 A. Yes.

24 **Q. -- prior to the publication of this  
25 article?**

1 different view. In that circumstance, no one's  
2 lying, they just have a different view of the  
3 circumstances. What I'm asking you here, do you  
4 believe Ms. Bonar is lying about these allegations?

5 A. I am saying that these allegations did not  
6 happen, period. They did not happen.

7 **Q. Do you have a viewpoint as to whether she  
8 is telling the truth?**

9 A. I'm saying that they didn't happen, and if  
10 she's --

11 **Q. She says they do -- did, and you say they  
12 didn't.**

13 A. I'm saying they didn't.

14 **Q. All right, so -- so either someone doesn't  
15 remember something or someone is not telling the  
16 truth. Which is it? What do you think it is from  
17 her perspective?**

18 A. I can't speak for her. I can't speak for  
19 her. I'm just -- from my perspective, I know  
20 100 percent that I didn't do what I'm being accused  
21 of.

22 **Q. And you're not suggesting that Ms. Bonar is  
23 lying about these accusations?**

24 A. I'm saying that I know 100 percent from my  
25 perspective that I never did any of these

1 A. Yes.

2 **Q. All right. On the third page of the  
3 exhibit, at the bottom, the second to the last  
4 paragraph, he states, "At Trujillo's request, I met  
5 with him at length and listened to his defense. He  
6 said Bonar lied about him for reasons he does not  
7 understand." Is it your view today that Ms. Bonar is  
8 lying about you?**

9 A. Well, this -- I'm not going to -- I'm not  
10 going to speak of what a -- to what a reporter wrote  
11 because it's his own interpretation --

12 **Q. Right.**

13 A. -- but your question is what now?

14 **Q. Is it your belief today, as you sit here,  
15 that Ms. Bonar is lying?**

16 A. My belief is that what Ms. Bonar accused me  
17 of is untrue or you can -- these allegations are  
18 untrue, yes.

19 **Q. Okay, so you believe she's not telling the  
20 truth?**

21 A. These did not happen.

22 **Q. I know you said it didn't happen, but  
23 sometimes things didn't happen because people  
24 misunderstand the circumstances or one person has one  
25 view of it from their vantage point, another has a**

1 allegations.

2 **Q. I understand that. So maybe we'll put it a  
3 different way. With the proviso that you believe  
4 100 percent that the events as alleged by Ms. Bonar  
5 did not happen, you are nonetheless not accusing her  
6 of lying, are you?**

7 A. Well, she put a statement out saying these  
8 did, so as you can -- as you may choose to interpret  
9 it.

10 **Q. How do you interpret it?**

11 A. Just that I know 100 percent that I did not  
12 do these, and --

13 **Q. So do you have any view at all as to  
14 whether she is lying?**

15 A. I can't speak for her.

16 **Q. I'm not asking you to speak for her. I'm  
17 asking you to speak for you.**

18 A. And I think I have, I think I've said 100  
19 percent that I did not do what she's alleged that I  
20 did, and I stand by that.

21 **Q. Okay. Fair enough. You're not going to  
22 take the position in a hearing that Ms. Bonar is  
23 lying about these matters as has been reported you  
24 stated to the press? Correct?**

25 A. So you are -- please re --



1 **Q. I just want to know what you're going to**  
2 **testify about. Are you going to say, as you did in**  
3 **these -- allegedly did in these articles, that**  
4 **Ms. Bonar is lying?**

5 A. I will tell you that the -- when these  
6 allegations got made, my campaign strategist asked if  
7 these are true, I said they're not, and so she made a  
8 determination, because they're untrue, to say that  
9 these are lies.

10 **Q. Your campaign manager made that**  
11 **determination?**

12 A. She asked me if they were true and I said  
13 they're untrue, and she said, then it's a lie, and so  
14 here we are.

15 **Q. And that's how it's been reported. So this**  
16 **is actually the words of your campaign manager, not**  
17 **Carl Trujillo, that Ms. Bonar is lying?**

18 A. I believe Ms. Bonar is being untruthful.

19 **Q. You believe she's being untruthful?**

20 A. I believe that.

21 **Q. Okay. You're entitled to believe whatever**  
22 **you wish. I'm just entitled to understand what you**  
23 **believe, okay.**

24  
25

1 lot of this, but she would pass it through me to look  
2 at it.

3 **Q. And you approved the statement that**  
4 **Ms. Bonar is lying?**

5 A. I believe Ms. Bonar is being untruthful,  
6 and if you want to conclude lying, yes, that's --  
7 yes.

8 **Q. Okay. And you also state that "when people**  
9 **lie like this, it's because they're being intimidated**  
10 **or threatened." Do you have any evidence that**  
11 **Ms. Bonar was intimidated or threatened?**

12 A. I don't have any evidence --

13 **Q. Okay.**

14 A. -- not at this time.

15 **Q. Okay. You also -- I don't know if you**  
16 **referenced earlier any statements by Representative**  
17 **Debbie Armstrong concerning --**

18 A. I had not referenced any.

19 **Q. You're aware of those statements that she**  
20 **previously made about other women --**

21 A. Yes.

22 **Q. -- supposedly confiding in her about your**  
23 **activities?**

24 A. I remember reading that, yes.

25 **Q. Did you ever find anything out about that**

1 (Exhibit 13 marked.)

2 **Q. (By Mr. Hnasko) I'll hand you Exhibit 13.**  
3 **Could you identify Exhibit 13, please.**

4 A. It looks like there's two parts to it.

5 **Q. Okay.**

6 A. One of them is a summary, or something, off  
7 of my website, and the other one is a letter from  
8 Lucero Professional Services to Ms. Molly  
9 Schmidt-Nowara, N-O-W-A-R-A.

10 **Q. Let's just focus on the material from your**  
11 **website, okay.**

12 A. Okay.

13 **Q. That would be the first two pages?**

14 A. Yes.

15 **Q. And on the second page, again, I'm going to**  
16 **quote what it says. It says, "Ms. Bonar is lying.**  
17 **Usually when people lie like this, it's because they**  
18 **are being intimidated or threatened into lying, and**  
19 **if that's the case she has our sympathies, but that**  
20 **doesn't make her lie any less heinous." Do you see**  
21 **that?**

22 A. I see that.

23 **Q. Are those your words or your campaign**  
24 **manager's words?**

25 A. These are -- my campaign manager wrote a

1 **allegation?**

2 A. None at all other than from you.

3 **Q. Okay.**

4 A. That's where you stated that you couldn't  
5 use it because nobody wanted to come...

6 **Q. Incidentally, do you have recorded**  
7 **information concerning the investigator you**  
8 **previously mentioned?**

9 A. Yes, I did mention that to you. It's one  
10 recording that Ms. Block, Jennifer Block, had sent to  
11 me.

12 **Q. It's a recording of her?**

13 A. No, it's just a recording of Mr. Corwin  
14 leaving a message for her to call him back --

15 **Q. Okay.**

16 A. -- and -- yes.

17 **Q. Anything else besides call me back?**

18 A. I'd have to listen to the message again.

19 **Q. Do you have that on your phone or how is**  
20 **that maintained, that recording?**

21 A. I think she e-mailed it to me probably, or  
22 I don't know, I'd have to find it.

23 **Q. You still have that, I take it?**

24 A. I do.

25 **Q. Okay.**



1 (Exhibit 14 marked.)  
 2 Q (By Mr. Hnasko) Let me hand you Exhibit 14.  
 3 Is that right? Yup. Ask you to identify that,  
 4 please.  
 5 A. This is a statement on May 2nd from Carl  
 6 Trujillo's Campaign for Change.  
 7 Q. Is that a posting you would have made on  
 8 Facebook or something like that?  
 9 A. I don't recall.  
 10 Q. On paragraph 6, it's stated here that "I  
 11 have recorded evidence from multiple people that  
 12 someone hired a private detective with a reputation  
 13 for dishonest tactics to dig up exactly this kind of  
 14 dirt." Is that the recording you're referencing, you  
 15 referenced a few minutes earlier in our questioning?  
 16 A. That's -- yes.  
 17 Q. Do you have any other recordings besides  
 18 the one you mentioned?  
 19 A. I would have to go back. It was an old  
 20 phone, and I think I had recorded the other person  
 21 telling me that they were getting calls, but I  
 22 don't -- I'd have to go find it if I -- if it still  
 23 even works.  
 24 Q. Okay.  
 25 A. But it was very noisy, and I couldn't...

1 title, but she works for PNM, I know that.  
 2 Q. And I think I know what Ms. Noya's  
 3 intending to testify about, but I'm not sure about  
 4 Ms. Yamada. It says here she's a lobbyist and will  
 5 testify about her dealings and experiences with you.  
 6 Is that -- is she coming to talk about your general  
 7 character or what do you -- what do you anticipate  
 8 she's going to bring to the table?  
 9 A. I believe -- I'm not sure, but I believe  
 10 that -- not about my character, I don't think. I  
 11 don't know. Obviously, she's going to be subject to  
 12 cross-examination from you and questions from my  
 13 attorney, but just that I've worked with her and it's  
 14 always been professional.  
 15 Q. Okay. And she finds you to be an  
 16 outstanding --  
 17 A. I can't -- not going to say that that's  
 18 what she'll testify to. I don't know.  
 19 Q. Why did -- why did you pick Ms. Yamada as a  
 20 witness?  
 21 A. There was -- there's been many people that  
 22 I've worked with, and -- and she's -- no particular  
 23 reason.  
 24 Q. How about, did you approach Ms. King to be  
 25 a witness for you?

1 (Exhibit 15 marked.)  
 2 Q. (By Mr. Hnasko) Hand you Exhibit 15. Does  
 3 this appear to be your answers to interrogatories  
 4 submitted the other day? Do you remember these?  
 5 A. Yes.  
 6 Q. I notice you didn't verify them under oath.  
 7 Are you intending to do that?  
 8 A. Yes.  
 9 MR. JACKSON: Yes.  
 10 MR. HNASKO: You already did or -- I may  
 11 have missed it.  
 12 MR. JACKSON: Yeah, we can verify it. I  
 13 didn't.  
 14 MR. HNASKO: I didn't see it, so...  
 15 Q. (By Mr. Hnasko) If you could do that, I'd  
 16 appreciate it.  
 17 A. Yeah.  
 18 Q. You've identified as a witness Jennifer  
 19 Noya, who's a lawyer at the Modrall firm in  
 20 Albuquerque, correct?  
 21 A. Correct.  
 22 Q. And you've identified Sayuri Yamada, who's  
 23 in charge of government relations at PNM; is that  
 24 correct?  
 25 A. As I know it -- I don't know her exact

1 A. I don't -- I don't know. I don't know if  
 2 we -- I will say that during the investigating  
 3 period, that we -- it was recommended to find people  
 4 who would submit letters, and you'll see those  
 5 letters submitted in our evidence binder.  
 6 Q. I've got these letters. I'm just  
 7 curious -- I know Ms. Yamada submitted a letter, as  
 8 well, correct?  
 9 A. Um-hum.  
 10 Q. I'm curious why she was selected versus  
 11 Ms. King or the other --  
 12 A. So I believe --  
 13 Q. -- people who submitted letters?  
 14 A. I think my attorneys had looked at the  
 15 letters --  
 16 MR. JACKSON: Just --  
 17 Q. I don't want -- if it's your attorney's  
 18 choice, I don't want to know about it.  
 19 MR. JACKSON: This is an attorney's  
 20 decision. And not to argue with you, I just want to  
 21 give you a proffer on Yamada. She's only going to  
 22 testify --  
 23 MR. HNASKO: That's fine.  
 24 MR. JACKSON: -- that she worked with  
 25 Mr. Trujillo and that he did not sexually harass her,



1 she's not going to be a character witness.

2 **Q. (By Mr. Hnasko) So he's going to bring in**  
3 **someone who says -- you're bringing in someone who**  
4 **says, I worked with you and you did not sexually --**  
5 **he did not sexually harass me. Is that your**  
6 **understanding?**

7 MR. JACKSON: This is a lawyer decision  
8 and --

9 MR. HNASKO: I know, but I want to know his  
10 understanding.

11 **Q. (By Mr. Hnasko) I don't want to hear about**  
12 **your conversations with your attorney, and if he's in**  
13 **charge of selecting her, that's fine, just say you**  
14 **didn't.**

15 A. Okay.

16 **Q. Okay. So do you understand once Ms. Yamada**  
17 **makes that statement under oath, that I have the**  
18 **right to bring in contrary evidence to that?**

19 A. What was the statement that she makes?

20 **Q. Well, I believe there was a proffer just**  
21 **made that the statement she's going to make is that**  
22 **she worked with you for X amount of time and never**  
23 **once during that time did you sexually harass her.**

24 A. Okay.

25 **Q. And I want to know if you have an**

1 **understanding that once you bring in evidence like**  
2 **that, I have the right at least to seek to bring in**  
3 **evidence to the contrary through other witnesses?**

4 MR. JACKSON: I'm going to object.

5 **Q. Not necessarily Ms. Bonar.**

6 MR. JACKSON: I'm going to object. You're  
7 asking him a legal question. I think the lawyers  
8 will argue about what evidence gets introduced or  
9 admitted.

10 MR. HNASKO: Well, they will, but I didn't  
11 ask it that way, whether it was. I said I have the  
12 right to seek to introduce contrary evidence of  
13 character once -- if Ms. Yamada testifies that -- as  
14 per the proffer.

15 A. Yeah, I don't -- I don't know the -- I'm  
16 not a lawyer, so I don't know what your right --

17 **Q (By Mr. Hnasko) I just don't want you to be**  
18 **surprised, okay. I mean, it's only fair. I want you**  
19 **to know what I'm going to do. It's not fair for me**  
20 **to hide behind the law. But if Ms. Yamada comes in**  
21 **and testifies, and your able counsel here might be**  
22 **successful in preventing me from doing so, but I am**  
23 **going to try and proffer that evidence, and I think**  
24 **it's only fair that you know that. So my question**  
25 **is, do you understand that that's what I'm going to**

1 **do?**

2 MR. JACKSON: Object to form.

3 A. That you're going to try to find -- please  
4 tell me what you're going to try and do in layman's  
5 terms here.

6 **Q. I'll go very layman.**

7 A. Okay.

8 **Q. Ms. Yamada's going to come in with what I**  
9 **call the Boy Scout defense. Okay.**

10 A. Okay.

11 **Q. I'm going to come in after that and say**  
12 **no --**

13 A. And I don't know why you'd call it the Boy  
14 Scout defense. I think it's just the -- I think --

15 **Q. Well, you asked me to put it in layman's**  
16 **terms --**

17 MR. JACKSON: Just answer.

18 THE WITNESS: Okay.

19 **Q. -- so I'm giving you my -- my -- my**  
20 **terminology of it. You may have a different one.**  
21 **But if she comes in with that sort of character**  
22 **evidence, I, too, will try to bring in contrary**  
23 **character evidence, which I would not be otherwise**  
24 **able to do but for her proffered testimony on this**  
25 **issue.**

1 A. I will have to refer to my attorney and ask  
2 what -- what you can and can't do. I don't -- I  
3 don't know, so...

4 **Q. Okay. Have you ever been to the Skyline**  
5 **Lounge in Santa Fe?**

6 A. Skyline.

7 **Q. It might be the Skylight. Does that ring a**  
8 **bell?**

9 A. Yes.

10 **Q. All right. Do you recall attending a party**  
11 **there?**

12 A. I -- I recall being there. I don't know  
13 what the particular reason was for.

14 **Q. With a number of women from the**  
15 **legislature?**

16 A. I recall being at the Skyline with many  
17 people.

18 **Q. If I brought in one of those women to**  
19 **testify that you were inappropriate in your touching**  
20 **of them that evening, would they be telling a lie?**

21 A. I can't speak to -- to who you're speaking  
22 of.

23 **Q. If I brought in a woman to testify that at**  
24 **the Skylight Lounge you were inappropriate, not just**  
25 **in verbal conduct, but in physical conduct, would**



1 they be telling a lie?

2 A. I would have to -- I don't know who you're  
3 speaking of.

4 Q. If I brought in --

5 MR. JACKSON: I'm going to object. This is  
6 a hypothetical. If you want to ask him about a  
7 witness, ask him.

8 MR. HNASKO: I don't need to ask about a  
9 witness. I can ask -- this is a perfectly --

10 MR. JACKSON: It's a hypothetical. I'm  
11 going to instruct him not to answer it.

12 MR. HNASKO: It's not a hypothetical.

13 MR. JACKSON: If you brought in a witness  
14 is a hypothetical.

15 MR. HNASKO: I have no right to disclose  
16 any witnesses until I hear what Ms. Yamada says or if  
17 she does testify. If she doesn't testify, I can't  
18 bring it in.

19 Q (By Mr. Hnasko) So if I were to bring in  
20 documentary and other evidence showing you acting in  
21 a sexually suggestive manner at parties, and had a  
22 woman testify about that, would she be lying?

23 MR. JACKSON: Same objection. I'm  
24 instructing you not to answer. These are  
25 hypotheticals. You're asking him to speculate about

1 A. I don't -- you get called in for a vote,  
2 and so I don't know. I mean, I can't speak -- I  
3 can't recall.

4 Q. Okay.

5 MR. HNASKO: All right, subject to our  
6 reservation to attempt to bring you back for another  
7 deposition to answer the questions your counsel  
8 directed you not to answer, I'm going to pass the  
9 witness right now.

10 MR. JACKSON: I have no questions.

11 MR. HNASKO: Thank you for coming in today.

12 MR. JACKSON: We'll read and sign.  
13 E-transcript, please.

14 MR. HNASKO: Same.

15 (The deposition concluded at 12:31 p.m.)  
16  
17  
18  
19  
20  
21  
22  
23  
24  
25

1 evidence you've not produced and not identified, and  
2 how -- how he would respond to it if you did.

3 Q. All I gotta know is if they'd be lying or  
4 not, and you're under oath.

5 MR. JACKSON: I object. I'm going to  
6 instruct you not to answer.

7 Q. (By Mr. Hnasko) And I'm going to make my  
8 offer of proof that Ms. Yamada's designation changes  
9 the playing field quite a bit. Just so you know  
10 that, okay.

11 Have you ever been on the House floor  
12 drinking alcohol?

13 A. Yes.

14 Q. In what instance?

15 A. In the instance that many of the evenings  
16 that -- it was late, this was towards the -- if we'd  
17 be there until 2:00 or 3:00 in the morning, the --  
18 the -- at that time, the Minority Leader Brian  
19 Egolf's office was right off the House chambers, and  
20 he had an alcohol cabinet in his office and many  
21 legislators were in there drinking on the couch in --  
22 in those chambers. And was I ever offered a drink by  
23 them? Yes. Did I have a drink? Yes.

24 Q. On the House floor while the legislature  
25 was in session?

1 BEFORE THE HEARING SUBCOMMITTEE  
2 OF THE INTERIM LEGISLATIVE ETHICS COMMITTEE

3  
4 In re: Representative Carl  
5 Trujillo,  
6 Respondent.

7 CERTIFICATE OF COMPLETION OF DEPOSITION  
8 I, PEGGY JO GONZALES, New Mexico CCR #145, DO  
9 HEREBY CERTIFY that on November 8, 2018, the  
10 deposition of CARL TRUJILLO was taken before me at  
11 the request of, and sealed original thereof retained

12 by:  
13 Attorney for the Special Counsel  
14 MR. THOMAS M. HNASKO  
15 HINKLE SHANOR, LLP  
16 218 Montezuma  
17 Santa Fe, New Mexico 87504  
18 thnasko@hinklelawfirm.com 505.982.4554

19 I FURTHER CERTIFY that copies of this  
20 certificate have been mailed or delivered to all  
21 Counsel, and parties to the proceedings not  
22 represented by counsel, appearing at the taking of  
23 the deposition.

24 I FURTHER CERTIFY that examination of this  
25 transcript and signature of the witness was requested  
by the witness and all parties present.

On \_\_\_\_\_ a letter was mailed or delivered to  
MR. TRAVIS G. JACKSON regarding obtaining signature  
of the witness.

I FURTHER CERTIFY that the recoverable cost of  
the original and one copy of the deposition,  
including exhibits, to MR. THOMAS M. HNASKO is  
\$ \_\_\_\_\_.



I FURTHER CERTIFY that I did administer the oath to the witness herein prior to the taking of this deposition; that I did thereafter report in stenographic shorthand the questions and answers set forth herein, and the foregoing is a true and correct transcript of the proceeding had upon the taking of this deposition to the best of my ability.

I FURTHER CERTIFY that I am neither employed by nor related to nor contracted with (unless excepted by the rules) any of the parties or attorneys in this case, and that I have no interest whatsoever in the final disposition of this case in any court.

Peggy Jo Gonzales, CM  
Bean & Associates, Inc.  
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(1208N-PJ)  
Date Taken: November 8, 2018  
Proofread by: PJ/CB

RECEIPT

JOB NUMBER: (1208N-PJ) November 8, 2018  
WITNESS NAME: CARL TRUJILLO  
CASE CAPTION: In Re: Representative Carl Trujillo

ATTORNEY: MR. THOMAS M. HNASKO  
DOCUMENT: Transcript / Exhibits / Disks / Other \_\_\_\_\_  
DATE DELIVERED: \_\_\_\_\_ DEL'D BY: \_\_\_\_\_  
REC'D BY: \_\_\_\_\_ TIME: \_\_\_\_\_

ATTORNEY: MR. TRAVIS G. JACKSON  
DOCUMENT: Transcript / Exhibits / Disks / Other \_\_\_\_\_  
DATE DELIVERED: \_\_\_\_\_ DEL'D BY: \_\_\_\_\_  
REC'D BY: \_\_\_\_\_ TIME: \_\_\_\_\_

ATTORNEY:  
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DATE DELIVERED: \_\_\_\_\_ DEL'D BY: \_\_\_\_\_  
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ATTORNEY:  
DOCUMENT: Transcript / Exhibits / Disks / Other \_\_\_\_\_  
DATE DELIVERED: \_\_\_\_\_ DEL'D BY: \_\_\_\_\_  
REC'D BY: \_\_\_\_\_ TIME: \_\_\_\_\_

In Re: Representative Carl Trujillo  
WITNESS SIGNATURE/CORRECTION PAGE  
If there are any typographical errors to your deposition, indicate them below:

PAGE LINE  
\_\_\_\_\_ Change to \_\_\_\_\_  
\_\_\_\_\_ Change to \_\_\_\_\_  
\_\_\_\_\_ Change to \_\_\_\_\_  
\_\_\_\_\_ Change to \_\_\_\_\_

Any other changes to your deposition are to be listed below with a statement as to the reason for such change.

PAGE LINE	CORRECTION	REASON FOR CHANGE
_____	_____	_____
_____	_____	_____
_____	_____	_____
_____	_____	_____

I, CARL TRUJILLO, do hereby certify that I have read the foregoing pages of my testimony as transcribed and that the same is a true and correct transcript of the testimony given by me in this deposition on November 8, 2018, except for the changes made.

Date Signed CARL TRUJILLO

(1208N-PJ) Proofread by: PJ/CB

DATE DELIVERED: \_\_\_\_\_  
MR. TRAVIS G. JACKSON  
JACKSON LOMAN STANFORD DOWNEY, P.C.  
201 3rd Street  
Suite 1500  
Albuquerque, New Mexico 87103  
RE: In Re: Representative Carl Trujillo  
DEPOSITION OF: CARL TRUJILLO  
DATE TAKEN: November 8, 2018

Dear Mr. Jackson:  
At the time of the above deposition/sworn statement, it was requested that the witness read and sign his/her transcript.

Enclosed is your copy of the transcript with the original signature page. Please ask the witness to read the transcript, make any corrections on the signature page, and return the original signature page to our Albuquerque office.

Enclosed is your copy of the transcript. Please read it, note any corrections on the signature page, and return the original signature page to our Albuquerque office. You may keep the transcript for your files.

The transcript is now ready to review. Please contact our Albuquerque office, 505-843-9494, to make arrangements to have the transcript read and signed. If you are outside the Albuquerque area, please call 800-669-9492.

The transcript is now ready for review. Please remit payment in the amount of \$ \_\_\_\_\_ to our Albuquerque office. As soon as payment is received, your transcript will be delivered. If you choose not to pay, please contact our Albuquerque office, 505-843-9494, to make arrangements for signature.

Trial in this matter is set for \_\_\_\_\_. If the transcript has not been read and signed before that date, the original will be filed without a signature.



Other: \_\_\_\_\_  
\_\_\_\_\_  
\_\_\_\_\_

The New Mexico Rules of Civil Procedure provide the witness 30 days, in most instances, from the receipt of this letter to read and sign his/her transcript. If he/she has not read and signed the transcript in that time, we will file the original transcript without the signature page.

Sincerely,

BEAN & ASSOCIATES, INC.

JOB NO.: (1208N-PJ)