

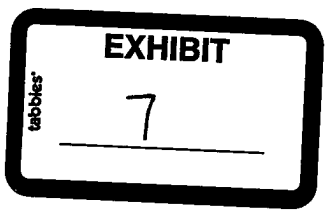
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IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION

DAIMLER CHRYSLER FINANCIAL)
SERVICES AMERICAS, LLC f/k/a)
DAIMLER CHRYSLER SERVICES)
NORTH AMERICA, LLC,,)
Plaintiff,)
-vs-)
GERALD W. GORMAN, an)
Individual, and ELIZABETH)
GORMAN, an Individual,)
Counterclaim Defendants)
and Judgment Debtors,)
THE GORMAN GOOD GOVERNMENT)
GROUP,)
Third-Party Respondent.)

03 CV 00760

Citation to discovery assets of MARGARET WALSH
taken before CAROL CONNOLLY, CSR, CRR, and Notary Public,
at 55 East Monroe Street, Suite 3700, Chicago, Illinois,
commencing at 2:00 p.m. on the 17th day of February,
A.D., 2010.



M E R R I L L C O R P O R A T I O N

1 There were present at the taking of this
2 deposition the following counsel:

3 THOMPSON COBURN FABEL HABER by
4 MR. GLEN KEYSOR
5 55 East Monroe Street
6 37th Floor
7 Chicago, Illinois 60603
8 (312) 346-7500

9 appeared on behalf of the Plaintiff;

10 JAMES J. ROCHE & ASSOCIATES by
11 MR. JAMES J. ROCHE
12 642 North Dearborn
13 Chicago, Illinois 60654
14 (312) 335-0044

15 appeared on behalf of the Counterclaim
16 Defendants and Judgment Debtors.
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I N D E X

DEPOSITION OF MARGARET WALSH

TAKEN February 17, 2010

EXAMINATION BY	PAGE
Mr. Glen Keysor	5

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1 MARGARET WALSH,
2 called as a witness herein, having been first duly
3 sworn, was examined upon oral interrogatories and
4 testified as follows:

5 EXAMINATION

6 By Mr. Keysor:

7 MR. KEYSOR: For the record, this is the citation
8 examination of the Gorman Good Government Group.

9 Q Appearing on behalf of the Gorman Good
10 Government Group is Margaret Walsh, is that correct?

11 A That's correct.

12 Q And this is being taken pursuant to citation to
13 discover assets and notice of citation in the case of
14 Daimler Chrysler Financial Services Americas, LLC versus
15 Gerald Gorman, Elizabeth Gorman, et al. 03 CV 00760 in
16 the United States District Court For The Northern
17 District of Illinois, Eastern Division. It's also being
18 taken pursuant to the applicable Federal Court rules.

19 Mrs. Walsh, I'm going to be asking you a series
20 of questions. If for any reason you don't understand the
21 question, if it's confusing to you, please let me know
22 and I'll try and rephrase it. Otherwise, please answer
23 the question orally, fully so that she can take down your
24 responses. A nod of the head cannot be transcribed. So

1 if you would speak out your answers, that would be
2 appreciated.

3 A Sure. I understand.

4 Q Would you please state your full name for the
5 record, please?

6 A Margaret Walsh.

7 Q And your address?

8 A 3547 South Emerald Avenue, Chicago, Illinois,
9 60609.

10 Q What is your occupation?

11 A Presently I'm chief of staff to Commissioner
12 Elizabeth, Liz, Doody Gorman.

13 Q Other than your relationship as chief of staff,
14 do you have any other relationship with Elizabeth Gorman?
15 Are you related to her?

16 A Family-wise?

17 Q Yes.

18 A No, I'm not.

19 Q Do you have any relationship with the Doody
20 family?

21 A No, I do not.

22 Q What is your relationship to or position at the
23 Gorman Good Government Group?

24 A I served as treasurer of that organization.

1 Q During what period of time?

2 A I would say from -- gosh, I don't have the
3 exact date, but I would say sometime in 2006 through
4 December of 2009.

5 Q And who was the treasurer before you?

6 A Brent Woods.

7 Q Do you know what timeframe he was a treasurer?

8 A I'm not certain. It was -- he was treasurer
9 before I came to work for Liz. I'm not sure when he
10 started.

11 Q When did you come to work for Liz?

12 A I began working for her in June of 2005.

13 Q Was that with the Gorman Group -- for purposes
14 of this deposition in order to abbreviate names, I'll
15 refer to the Gorman Good Government Group as either the
16 group or the Gorman Group if that's okay with you.

17 A That's fine. I understand.

18 Q When you started --

19 A To make it clear though, in June of 2005 I came
20 to work for the commissioner as her chief of staff at
21 Cook County, not the group.

22 Q You started with the group sometime in '06 you
23 said?

24 A Right. I'm trying to be clear with you too

1 though. You say with the group. I became treasurer
2 sometime in 2006. I was involved on -- the group end of
3 things as well on my own time.

4 Q Explain that. Prior to '06 you were -- had
5 anything to do with the Gorman Group?

6 A Yes. I would have prior to '06. Shortly --
7 not long after I started working for her I also attempted
8 to assist her on that end of the world as well.

9 Q Prior to June of '05 when you joined
10 Mrs. Gorman's staff as chief of staff, did you do any
11 work on the Gorman Group?

12 A No.

13 Q Everything started as of when you became her
14 chief of staff?

15 A Correct.

16 Q Did you have any relationship, business or
17 otherwise, with Mrs. Gorman prior to June of '05 when you
18 became her chief of staff?

19 A I had had some minor dealings with her
20 previously relative to her insurance business, very
21 minor.

22 Q Prior to June of '05 what did you do? Were you
23 employed?

24 A Yes, I was. Just before coming to work for the

1 commissioner I worked for a law firm in Bolingbrook.

2 Q What was the name of that firm?

3 A Moss and Bloomberg.

4 Q What did you do for them?

5 A I was a legal assistant, legal secretary.

6 Q How long were you a legal secretary at that
7 firm?

8 A Slightly under a year. Perhaps 9 months.

9 Q Before that?

10 A I worked for another law firm down here, Hunt
11 and Associates.

12 Q As a legal secretary?

13 A Right. I forget what title. The partners'
14 secretary, executive assistant, whatever.

15 Q Prior to June of '05 had you had any experience
16 working for political campaign or as a chief of staff for
17 any political campaign?

18 MR. ROCHE: I'm going to object to form of the
19 question because I mean she was chief of staff. That's
20 not a campaign. That's separate, you know. Just kind of
21 co-mingling things here.

22 MR. KEYSOR: Q Chief of staff of her -- how would
23 you describe what you were chief of staff of?

24 A I'm chief of staff for her as Commissioner of

1 Cook County. That is totally separate from the Gorman
2 Good Government Group.

3 Q What were your duties as chief of staff?

4 A They're varied. I attend all the board
5 meetings at Cook County, most of the committee meetings,
6 whether or not the commissioner is on a committee so I
7 can keep her informed as to what is going on in the
8 committees. I attend meetings with department heads,
9 many meetings with the forest preserve because there's
10 many forest preserve issues within her district. I don't
11 know how much detail you want me to go into.

12 Q Did you prepare reports for her?

13 A Either -- yes, verbal and some written, yes,
14 depending on the circumstances of what -- of different
15 projects that, you know, we may be working on or
16 different matters.

17 Q Prior to June of '05, had you had any other
18 experience acting either as a chief of staff or any other
19 position for a politician whether it be Mrs. Gorman or
20 anyone else?

21 A Yes, I did -- I worked at Democratic
22 headquarters for a number of years.

23 Q She's a Republican you know.

24 A I do know that.

1 Q What did you did do for the Democratic
2 organization?

3 A I worked for Democratic Party of Cook County
4 for how many years? From '74 to '87. Duties as far as
5 that's concerned?

6 Q Yes.

7 A Very varied. Democratic Party at that time
8 would have a fundraiser every year. It was generally in
9 the spring. I handled all facets of that from collection
10 of money to seating of people at, you know, at the
11 dinners, which at times was as many as 7,000 people,
12 making arrangements with the hotel, all facets of an
13 event. I don't think you want me to get into a lot of
14 detail with that.

15 In addition, at different times it would be
16 working with attorneys in preparation of petitions,
17 candidates that were running for office. Everything.

18 Q I mean did you attend committee meetings and
19 act as the liaison on particular --

20 A I would take the minutes for the meetings of
21 the central -- of the committee and keep track of that,
22 things like that.

23 Q What were your duties as treasurer for the
24 Gorman Group?

1 A Basically the duties are keeping track of the
2 moneys that are taken in and expended and then filing all
3 of the proper reports with the State Board of Elections.

4 Q So you would be familiar in your position with
5 the bank accounts of the Gorman Group, the moneys that it
6 received in in donations or other ways, loans that were
7 made to the Gorman Group and the expenses that were paid
8 from the account of the Gorman Group?

9 A Yes, sir, that's correct.

10 Q Did you have anyone working for you during this
11 period of time?

12 A Anyone working for me?

13 Q Yes, helping you as treasurer.

14 A No, no.

15 Q Did you prepare the semi-annual reports on any
16 amendments that were required by what is it the --

17 A State Board of Elections?

18 Q State Board of Elections.

19 A Yes, I did.

20 Q Did you -- Were you familiar with the reports
21 and amendments that were generated by the Gorman Group
22 prior to you becoming president -- treasurer?

23 A I wasn't aware of those beforehand. I became
24 somewhat familiar with them afterwards.

1 Q Prior to you becoming treasurer in -- sometime
2 in 2006, who would prepare the semi-annual reports and
3 amendments for the group?

4 A I would guess it would have been Brent Woods
5 the preceding treasurer.

6 Q Do you know if Mrs. Gorman had anything to do
7 with it?

8 MR. ROCHE: Are you talking about before 2006 or
9 after?

10 MR. KEYSOR: Q At any time even while you were
11 treasurer, did Mrs. Gorman have anything to do with
12 preparing the reports that were submitted?

13 A Not actual preparation, no. I mean I would
14 obviously discuss certain -- expenditures and so forth as
15 to what they were for and that, so -- the actual report
16 itself, no, she had nothing to do with it other than me
17 consulting with her to be sure that I understood exactly
18 what expenditures were for, so forth.

19 Q The reports that were made, the semi-annual
20 reports or any amendments to them, those were made either
21 by you or your predecessor as part of the normal and
22 every day -- part of the normal and usual course of
23 business for the Gorman Group?

24 A I would say yes.

1 Q They were required actually --

2 A They are required by the state board, right.

3 There's --

4 MR. ROCHE: Just make sure to let him finish his
5 question so she can write it down. This is not like
6 normal conversation in the real world. So he'll ask you
7 the question and answer it because she has to write it
8 down.

9 MR. KEYSOR: Q You were also listed I believe in
10 some of the documents that we're going to be getting into
11 as a consultant for the Gorman Group.

12 A Yes.

13 Q What were your duties as a consultant?

14 A It was basically the -- I'm not sure how to
15 describe it. I would work on campaign fundraisers for
16 her. So preparing -- making some of the arrangements for
17 the events, getting the mailings out and then performing
18 these duties as treasurer.

19 Q So this was also part of your duties as
20 treasurer of the Gorman Group? I would think preparing
21 and running fundraisers is one of the primary concerns of
22 the Gorman Group. Is that something that was within your
23 realm of duties?

24 A Yes. I'm not -- I would be more comfortable

1 saying that I acted as treasurer along with doing these
2 other duties. I wouldn't say that it was part of the
3 duties of treasurer because someone could be the
4 treasurer and not have performed these other things or
5 other activities for her.

6 Q Other than working on fundraisers, what other
7 duties did you consult about or what other things did you
8 consult about?

9 A I'm not totally sure how to respond to that.
10 There would be consultation in terms of her political
11 positions or future -- future fundraising events and also
12 her stances on political matters.

13 Q You distinguished that different from what your
14 duties would be as a chief of staff?

15 A Most definitely. It's very separate.

16 Q Did you keep separate time for your -- for the
17 amount you spent as a consultant?

18 A No, I didn't.

19 Q Did you bill your time to the Gorman Group for
20 your work as a consultant?

21 A No, other than the moneys that I received for
22 it, but no, I didn't bill.

23 Q Did you invoice them or submit any invoices to
24 them for your time? Because I see you were paid

1 separately as a consultant.

2 A Correct.

3 Q What was that payment or compensation based on?

4 A On the duties -- I mean it was an agreement --
5 the amounts was agreed to between myself and Ms. Gorman.

6 Q Was it based upon amount of time or was it a
7 flat rate or retainer?

8 A As you probably could see from the records it's
9 pretty much a flat rate. It was a pretty regular amount.

10 Q How much was that? Do you know?

11 A At one point it was 500 a month, at different
12 points it was a thousand a month.

13 Q You would get paid that every month since June
14 of '05?

15 A It wasn't every month. It -- and it's not
16 happening -- I'm not receiving anything like that right
17 now.

18 Q What determines whether or not you get paid as
19 a consultant?

20 A As I was doing the work -- I don't know really
21 know how to respond to that. Didn't really -- things got
22 easier with that, and, truthfully, the more I got to know
23 the commissioner I wanted to do some of this on -- some
24 of this type of work on my own time so I suggested to her

1 at times that she didn't need to give that to me any
2 longer to be quite honest.

3 Q So there was no set schedule of payments, you
4 would get paid every month, you would get paid every
5 other month, it was just a matter of how you and she
6 decided which month you would receive some compensation?

7 A Yes, I think that's fair.

8 Q Do you have a contract with the Gorman Group or
9 Ms. Gorman?

10 A No, I don't.

11 Q This is all verbal?

12 A Correct.

13 Q Now, you signed the answers to the citation to
14 discover assets, which I will show you a copy of what I
15 got.

16 A Yes.

17 Q Is that the document that you prepared and
18 signed?

19 A Yes.

20 Q The -- Strike that.

21 Did you consult with anybody else other than
22 yourself in preparing that document?

23 A Mr. Roche.

24 Q Anyone else from the Good Government Group?

1 A No.

2 Q Now, are you aware of the basis for this
3 citation, the fact that Mr. and Mrs. Gorman have a
4 judgment against them in favor of my client and we're
5 trying to find whether or not there's any assets that can
6 be used to pay down on that judgment? Are you aware of
7 that?

8 A I'm aware that there was some sort of a
9 judgment, and I'm aware there has been a long, ongoing
10 legal matters between the Gormans and Chrysler. I really
11 have not been privy or have information about all the
12 particulars about it. I've pretty much stayed out of
13 that.

14 Q Did you talk to anyone other than Mr. Roche
15 prior to coming to this deposition, to this citation exam
16 about this exam?

17 A Well, obviously the commissioner knew I was
18 coming, so I mean there was some discussion about that.
19 I also spoke with Mr. Odelson, another attorney.

20 Q And who is Mr. Odelson?

21 A He's an attorney and -- that I've known for a
22 long time.

23 Q Not with Mr. Roche's firm?

24 A No. He's with his own firm.

1 Q When did you have any conversations with
2 Mrs. Gorman about this citation?

3 A Well, after I was served with the citation.

4 Q What did you say to her and what did she say to
5 you?

6 A Specifically -- I truthfully don't remember
7 what we said to each other except that, you know, this is
8 -- I was served the Sunday after Christmas morning. I
9 wasn't thrilled about it and --

10 Q Had she been served by that time as well?

11 A I don't believe she had. I'm not certain, but
12 -- there wasn't a lot to be said about it, here it was,
13 and obviously -- I think mostly it was conversation -- I
14 was concerned with it and who do we call, what attorney
15 do we talk to about this because obviously that's what
16 you need to do when you're served with something like
17 that I guess.

18 Q And was that the extent of your conversation
19 with her?

20 A I don't recall anything further because it was
21 around Christmas, it was the holidays.

22 Q Do you recall talking with her or anyone else
23 in preparation of your citation exam today about the
24 citation or what you would be testifying to today?

1 A Nothing specific. I mean I spoke with
2 Mr. Roche, talked about it, but not in terms of --

3 MR. ROCHE: You don't have to discuss what we
4 discussed, but anything else he's talking about.

5 MR. KEYSOR: Just for the record you're appearing
6 here as counsel of record for the Gorman Good Government
7 Group, right?

8 MR. ROCHE: Yes, true.

9 MR. KEYSOR: Q I'm going to show you what has
10 previously been marked as Exhibit 1.

11 (Exhibit 1 marked as requested)

12 Q I'm going to show you what's been marked as
13 Exhibit 1 for identification. I ask you to take a look
14 at that and tell me what it is, please.

15 A It's a Form D2. It's Semi-Annual Report
16 required by State Board of Elections, and it appears to
17 be for the time of January 1 through June 30 of '02, and
18 it was filed on July 30 of '02.

19 Q Are you familiar with the semi-annual reports
20 kept by the Gorman Good Government Group?

21 A Yes, I am.

22 Q Is that one of the forms for the period of time
23 designated prepared and submitted by the -- by the group?

24 A I would assume that it is, yes.

1 Q Do you have any reason to believe that it's
2 not?

3 A No, I don't.

4 Q And after reviewing it, is it your belief that
5 that is a true and accurate copy of the D2 form for the
6 time period of January 1, '02 to June 30, '02?

7 A I would assume that it is. This is not a
8 report that I filed, but from all the markings -- from
9 the State Board markings I would have no reason not to
10 believe that this is a true and accurate copy.

11 Q And if you didn't prepare it and you didn't
12 prepare it because it was prior to your time as
13 treasurer, is this one that you believe that Mr. Woods
14 would have prepared? Was he treasurer at that time?

15 A I don't believe that he was. I don't know. I
16 don't know who was the original treasurer when she first
17 opened her campaign so I really don't know who filed
18 this.

19 Q Do you know when the Gorman Good Government
20 Group was started?

21 A I believe it -- looking from some of these -- I
22 thought it was sometime in early 2002. I don't have the
23 exact date.

24 Q That's the first one that was of record with

1 the Board of Elections so does that -- does the date on
2 there refresh your recollection at all?

3 A I know that I had looked at on a State Board of
4 Elections at one point as to when they filed their
5 original D1 -- I think it's called a D1 when you begin an
6 account, and I believe it was in 2002, but I don't know
7 that for certain. I don't recall specifically.

8 Q As you know the finances of the Good Government
9 Group today, is it your opinion that that accurately
10 reflects the financial records and status of the group as
11 of the date it bears?

12 A To my understanding, yes.

13 Q If you turn to I think it's second to last
14 page --

15 A Schedule C?

16 Q Yes. That's the schedule that shows the loans
17 that were made to the Gorman Group, is that correct?

18 A Yes.

19 Q That shows five loans being made to the Gorman
20 Group, four by Dodge at Midlothian and one by Sales Inc.
21 Is that what it shows?

22 A That's what it shows, yes.

23 Q Were you familiar with the loans that were made
24 by Dodge at Midlothian and Sales Inc.?

1 A Not at the time they were made, no, I wasn't.

2 Q When did you first become aware of the loans
3 listed there?

4 A Really quite recently when there was a matter
5 before the State Board of Elections.

6 Q What matter was that and why were these loans
7 part of that?

8 A The commissioner's opponent in the primary
9 filed a complaint with the State Board of Elections
10 regarding these loans.

11 Q What was his claim?

12 A He had issues with how the loans were reported
13 and then the amendments to the reports.

14 Q Who was that? Who made the objection?

15 A Mark Thompson.

16 Q Did the board have a hearing?

17 A Yes.

18 Q Did they reach a conclusion or make a finding?

19 A The hearing officer found that the claims were
20 unjustifiable, but it was -- actually the board was
21 meeting today, this morning, so I don't know if the board
22 then agreed with the hearing officer's recommendation.
23 That was being determined today, and I have not heard the
24 result of that.

1 Q Did you attend the hearing?

2 A Today?

3 Q No. The hearing officer's hearing.

4 A Yes, I did.

5 Q Did you testify at all during that hearing?

6 A Yes, I did.

7 Q Who else testified on behalf of the group?

8 A Commissioner Gorman.

9 Q With respect to the loans that are listed in
10 Exhibit 1, do you know whether or not there were any
11 documents prepared to evidence those loans?

12 A I don't.

13 Q Did you ever look to see if there were any
14 documents evidenced -- prepared to evidence those loans?

15 A I did not.

16 Q Did you instruct anyone or were you told by
17 anyone whether or not there were any documents? By
18 documents I'm referring to perhaps a note or a loan
19 agreement or perhaps a term sheet.

20 A No. I have -- this was all prior to me being
21 involved and so I have no knowledge of it.

22 Q In your duties as a treasurer, in going through
23 the books and records of the group, you've never come
24 across any written documentation of those loans?

1 A No, I have no information.

2 Q Do you know what the terms of those loans were?

3 A I do not.

4 Q So you don't know how long the loans were
5 supposed to be for?

6 A I do not.

7 Q You don't know if there were any terms of
8 payments?

9 A I don't.

10 Q Who would know knows those things?

11 A I don't know.

12 Q Would Mrs. Gorman be aware?

13 MR. ROCHE: Objection, talking about a conclusion of
14 the witness.

15 I mean over my objection, go ahead and answer.

16 THE WITNESS: I would -- I can only suppose that she
17 would, but I have no knowledge.

18 MR. KEYSOR: Q When she testified at this hearing
19 before the Board of Elections did she testify as to the
20 origin and nature of those loans?

21 A To my recollection there were no questions
22 asked like that.

23 Q Now it says that the loans were made by Dodge
24 at Midlothian and Sales Inc., is that correct?

1 A That's what this document says, yes, sir.

2 Q Do you know whether or not the money that came
3 into the group came from those entities?

4 A I didn't have anything to do with that at that
5 time so I don't know.

6 Q So you don't know from that what bank account
7 they may have come from?

8 A I don't.

9 Q As part of the normal business records of the
10 Gorman Group, would you keep copies of the checks that
11 come into the group by way of either donations,
12 contributions or loans such as this?

13 A I do. And since I have been -- while I was
14 serving as treasurer I did. What the practice was prior,
15 I don't know.

16 Q Who keeps all of these records on behalf of the
17 Gorman Group? Where are they located?

18 A All the records that I have privy to I keep at
19 my home.

20 Q Do they -- when you took over position as
21 treasurer, did you take over control of the documents of
22 the Gorman Group for prior to when you became treasurer?

23 A I received some documents. I don't know that
24 it's everything.

1 Q I would ask that you look through the documents
2 of the Gorman Group and find any documents relating to
3 these loans such as the checks that funded those loans,
4 any loan documents that you describe that might be within
5 the records of the Government Group.

6 A Okay.

7 Q All right?

8 MR. ROCHE: What's the date of that loan so I can
9 make sure we thoroughly exhaust --

10 MR. KEYSOR: These loans --

11 MR. ROCHE: A date will help me to track them down
12 if they exist.

13 MR. KEYSOR: The loans referred to in client's
14 documents start January 16th, '02 and there's five of
15 them that go through June 28th of '02. For your
16 reference it's page -- it's second to last page
17 Schedule C of the very first.

18 MR. ROCHE: That was 2002 D2?

19 MR. KEYSOR: January 1, 2002.

20 MR. ROCHE: Good. Very good.

21 MR. KEYSOR: Which is one of the documents that you
22 had forwarded.

23 MR. ROCHE: I don't think we have it, but -- I don't
24 think one exists, but I'll certainly double check.

1 MR. KEYSOR: Q Okay. Are you aware of what the
2 entity Dodge at Midlothian was?

3 A I know there was a car dealership. I'm
4 assuming it was involved with that.

5 Q Do you know if the Gormans had any relationship
6 with the Dodge at Midlothian car dealership?

7 A My understanding is yes, they did.

8 Q What's your understanding?

9 A That they owned it or Gerry owned it.

10 Q And Sales Inc., do you know what that entity
11 was?

12 A I understand now that that also had -- was a
13 business owned by Mr. Gorman.

14 Q It also had to do with the Dodge at Midlothian
15 Dealership?

16 A I don't know that specifically, sir.

17 Q Did you ever -- did you ever question
18 Mrs. Gorman or anyone else at the Gorman Group regarding
19 loans made to the Gorman Group?

20 A Recently, yes, we've had discussions about
21 that.

22 Q And when was the first discussion you had
23 regarding loans?

24 A When this matter came up with the State Board

1 of Elections and -- so then we sat down and discussed the
2 loans in question.

3 Q Who did you sit down with?

4 A Commissioner Gorman.

5 Q And do you recall the date of that first
6 meeting?

7 A I truly don't. Probably sometime in the last
8 -- I don't remember when that came up. Last month or
9 two.

10 Q Was anyone else present other than you and
11 Commissioner Gorman?

12 A I don't believe so. I think it was just a
13 conversation between the two of us.

14 Q And what was said during that conversation
15 regarding these loans?

16 A I was simply trying to get -- I don't know if
17 I'm jumping the gun here or not. Trying to understand
18 this whole situation of the loans.

19 Q What did she say to explain it to you?

20 A Well, it was sort of a give and take. I might
21 be jumping over some of your questions.

22 Q This is what I'm trying --

23 MR. ROCHE: That's what he wants to know.

24 THE WITNESS: Can I just give me little narrative

1 here?

2 MR. KEYSOR: Q I've asked for the conversation so
3 give me what your understanding of these loans was.

4 A When this issue came up before the State Board
5 of Elections, I went back -- I obviously had copies of
6 the D2s while I had been handling the account so I went
7 back onto the State Board of Election website and ran off
8 every report that had been filed for Gorman Good
9 Government group from its inception, all the D2s. I
10 shouldn't say every report. All the D2s. I didn't file
11 -- I didn't run off Als or these other reports that are
12 incorporated eventually in the D2.

13 So at that point in time I then determined -- I
14 saw that these loans were originally listed as being
15 loans from Dodge at Midlothian and Sales Inc., reports
16 were then amended where those loans were then being
17 reported as being loans from Gerald Gorman. So there
18 were a few different conversations to determine this, and
19 I was told that the commissioner was advised by an
20 accountant that because the companies that made these
21 loans were owned by Mr. Gorman that it -- that's how the
22 loans should be reflected as being from Mr. Gorman so the
23 reports were amended to reflect that.

24 Does that make sense?

1 Q Did you question whether or not changing the
2 lender for purposes of these loans Dodge at Midlothian is
3 the lender and the Gorman Group is the borrower so, did
4 you question whether or not the change of the name of the
5 lender complied with any state election laws? You're
6 changing it from a corporate donation loan to an
7 individual.

8 A Let me make it clear. I didn't change
9 anything. This is in the history of it.

10 Q I understand.

11 A I didn't specifically because I had been -- I
12 had experience with reports with the State Board of
13 Elections previously in that their concern seems to --
14 their main issue is transparency and to show where the
15 money is really coming from.

16 For instance, I had had a situation where a
17 check had been written to me during -- which was reported
18 on one of these reports and it was for reimbursement for
19 postage and I had gone to Party City to get balloons for
20 a fundraiser and such. The state board then contacted me
21 and said that that should not be reported as a check to
22 me, that it should be reported as an expenditure to the
23 post office and Party City and so forth. So when I was
24 told that the amendment was made showing the money coming

1 from Mr. Gorman from these two companies, in my mind that
2 was in keeping with how the state board wants things done
3 so I really had no reason to question the legality of
4 that.

5 Q I'll show you page 8 of Exhibit 1. I refer you
6 to the line item on the expense page there showing a
7 \$100,080 payment to Sales Inc., and how is that
8 designated?

9 A That's designated as a reimbursed expenses.

10 Q Do you know what that --

11 A Expenditure.

12 Q Do you know what that payment was for?

13 A I can now tell you what I have learned in these
14 last couple months about this.

15 Q Okay.

16 A I don't know which report this is, but --

17 Q It's Exhibit 1. It's the first report?

18 A If I may tell you a narrative as I've come to
19 understand the situation. That this was reported back in
20 2000 or whatever it was as an expenditure. When Brent
21 Woods was treasurer, I don't know exactly in what period,
22 I think it might have been near -- if I remember the
23 amended reports, either the end of 2003 or sometime in
24 2004, he was going through all the records and trying to

1 make sure that was up to date and correct and saw this
2 expenditure of the \$100,000 to Sales Inc. I spoke with
3 -- he spoke with the commissioner and was told that
4 actually it was a repayment -- it was a partial repayment
5 of loan. So this then goes back to the fact that Sales
6 Inc. was a company owned by Mr. Gorman and so it should
7 have been reported as a repayment of loan as opposed to
8 reimbursement.

9 So then my understanding is Mr. Woods worked
10 with the State Board to make the adjustments in the
11 computer program or whatever to accurately reflect then
12 as a repayment of loan to Mr. Gorman.

13 Q Well, the loan referenced on the Exhibit 1 D2
14 report made by Sales Inc. was for \$50,000.

15 A I understand.

16 Q You understand that?

17 A Yes, I do.

18 Q What's the reasoning to now say this
19 reimbursement expense item to Sales Inc. for \$100,080 was
20 really a repayment of that loan?

21 A Because if you take the loans -- the loans
22 initially reported from Dodge at Midlothian and Sales
23 Inc. and you combine those amounts, it eventually comes
24 up to like \$375,000 or \$395,000. As it's been explained

1 to me it was determined that seeing that he was the owner
2 of both of those companies it all should have been a
3 payment -- it should have been loans from Mr. Gorman. So
4 the moneys that went to Sales Inc. really, in essence,
5 went to Mr. Gorman as a repayment of loan.

6 Q Do you know how the check -- Strike that.

7 I'm assuming the payments that are made under
8 your Schedule B expenditures are made by check?

9 A Since I've taken over the accounts to my
10 knowledge, yes, but this is all prior to me.

11 Q I understand. But to your knowledge any
12 expenses or payments made by the Gorman Group prior to
13 when you became treasurer, were any of them paid other
14 than by check to your knowledge?

15 A I don't know.

16 Q You didn't look at any other expenses or any
17 other checking accounts or cancelled checks or anything
18 else since you've become treasurer?

19 A No, not really.

20 Q I'd also like you to procure a copy of this
21 check identified on Schedule B that we're talking about
22 to --

23 MR. ROCHE: Maybe it would be easier if we get done,
24 we go over -- you make me a list or something.

1 MR. KEYSOR: I can do it. I just want it for the
2 record to state because -- in case I miss something at
3 the end.

4 MR. ROCHE: Okay. No problem. I want to get you
5 everything you ask for and not miss anything. That's
6 all.

7 MR. KEYSOR: Q Do you know when the decision was
8 made to change the way the Gorman Group designated its
9 loans from Midlothian or Sales or Mr. Gorman?

10 A Again I wasn't there at the time, but by
11 looking at the records and when the reports were amended,
12 I believe it was either in late 2003 or sometime in early
13 2004.

14 Q I believe we'll see this 100,080 figure applied
15 somewhere later on in these documents as well.

16 A Correct, yes, sir, you will. That's what -- I
17 sat down and poured through all these reports so I
18 could --

19 Q What else were you told by Mrs. Gorman with
20 respect to these loans when you were talking with her in
21 preparing for this board of election hearing?

22 A I'm sorry.

23 Q Anything else that you can recall?

24 A No. Basically the conversation was why it was

1 reported, how it was originally -- not really that. It
2 was more why it was changed and she -- that's how it was
3 explained to me, and that was the bulk of the
4 conversation about those two items.

5 Q Do you know who the accountant was that advised
6 her to make these changes?

7 A I don't. I don't know that she told me an
8 accountant's name. I'm not certain.

9 Q Do you know where or were you ever told where
10 Dodge at Midlothian or Sales Inc. got the money to make
11 these loans to the Gorman Group?

12 A No, I have no knowledge of that at all.

13 Q Do you know whether or not they came from
14 Mr. Gorman's personal funds or did they come from the
15 company funds as listed here?

16 A I don't know.

17 Q I'm going to show you what's been marked as
18 Exhibit 2 which was previously marked as Exhibit 3.

19 (Exhibit 2 marked as requested)

20 Q Have you had a chance to review that?

21 A Yes.

22 Q And did you prepare or have anything to do with
23 preparing that document?

24 A No, I did not.

1 Q But is that a true and accurate copy to your
2 knowledge of the D2 amendment form that was filed in the
3 normal and ordinary course of business of the Good
4 Government Group?

5 A That's my understanding, yes, sir.

6 Q Now, this is an amendment to Form D2 for the
7 reporting period of January 1, 2002 through 6-30-2002, is
8 that correct?

9 A Yes, sir.

10 Q That is an amendment to Exhibit 1 that you had
11 just been looking at, is that correct?

12 A That's my understanding, yes, sir.

13 Q If you'll look -- when was that amendment filed
14 with the Board of Elections?

15 A It states here it was filed on November 26th of
16 2003.

17 Q Do you know who prepared that? Would that be
18 Mr. Woods by this time or do you know?

19 A I believe it was it would have been.

20 Q Okay. Do you know what that amends from the
21 original D2 form that was originally filed with the
22 board?

23 A It appears to me this is the time when it was
24 amended to show the loans having come from Mr. Gorman as

1 opposed to the two companies it previously had shown the
2 funds coming.

3 Q That shows all five of those loans to be in the
4 name of Gerald Gorman, correct?

5 A Yes.

6 Q And it's the Gorman Group's position that those
7 loans came from him and are owed to him now rather than
8 to the corporate entities that he may have owned or had
9 an interest in as originally listed, is that correct?

10 A That's my understanding, yes, sir.

11 Q Again I believe you testified that you don't
12 know from what accounts the moneys listed in these loan
13 amounts came from, whether it was Mr. Gorman's account or
14 whether it was the corporate accounts of Dodge at
15 Midlothian or Sales Inc., is that correct, you don't know
16 that?

17 A That's correct, I do not know.

18 Q But copies of the checks and deposit slips that
19 good -- the Gorman Group made if they made them at the
20 time would reflect that, is that correct?

21 A I -- I don't know. I wasn't involved with that
22 so I don't know.

23 Q As of this date -- Strike that.

24 On the last page it lists the loans. Would

1 those -- would those loans be the amounts that were due
2 as of the date of the amendment or as of the date of June
3 -- the end of the reporting period for which it was
4 amending?

5 A Again I didn't prepare it so I couldn't say for
6 sure. My belief and in dealing with these reports it
7 would reflect the situation at the end of June 30 of 2002
8 I believe.

9 Q Not only on Schedule C of this report, but
10 Schedule A, Part 3, loans received, it also corrected or
11 at least amended the designation of those loans on
12 Schedule A of this D2 form as well?

13 A That's what this appears to do, yes.

14 (Exhibit 3 marked as requested)

15 Q I ask you to take a look at that and tell me
16 what that is.

17 A This is the D2 report, covering the six month
18 period July 1, 2002 through December 31, 2002 filed on
19 March 12th, 2003.

20 Q That's the amendment to that D2 form?

21 A No. This appears to be the original -- I would
22 think the original one because --

23 Q It says amendment at the top?

24 A Yes, it says amendment at the top clearly.

1 Sorry.

2 Q Is that a true and accurate copy of the
3 document prepared in the normal and ordinary course of
4 business of the Gorman Group to your knowledge?

5 A It would seem to be. Truthfully I have not
6 looked at this report previously, but, yes, it has all
7 the markings. It's got the State Board identification
8 numbers and so forth.

9 Q You have no reason to believe it's not an
10 accurate copy of what was filed with the Board of
11 Elections?

12 A No, I do not.

13 Q Do you know what this amended?

14 A You know, really I don't know because I don't
15 know --

16 Q It still lists the loans as being in the name
17 of --

18 A Dodge.

19 Q Dodge at Midlothian and Sales Inc., correct?

20 A It does so I don't know.

21 Q If I can show you the original D2 form
22 submitted on behalf of the Gorman Group, it lists four
23 loans being made by Dodge at Midlothian? Do you see that
24 and then one loan by Sales Inc?

1 A Correct.

2 Q The amended that's been marked as Exhibit 3
3 shows five loans now being by Dodge at Midlothian, they
4 added a \$20,000 loan dated 10 looks like '03, 2002, is
5 that correct?

6 A That's correct.

7 Q So that updates the number of loans made by
8 Dodge at Midlothian, is that correct?

9 A That's what's there, yes.

10 Q Do you know anything about that loan being
11 made?

12 A No.

13 Q And schedule --

14 A I know there was a such loan made -- that's
15 what I've been informed about, but when it was made, by
16 whom it was made, what account it was made from, no, I
17 have no knowledge.

18 Q According to the business records of the Gorman
19 Group, as evidenced by Exhibit 3 to your depo -- your
20 citation exam, it shows that in October of 2002's Dodge
21 at Midlothian made another loan to the Gorman Group of
22 \$20,000, correct?

23 A That is what that shows, yes, sir.

24 Q I believe the amended that we had previously

1 looked at as Exhibit 2 had not at the time of that
2 amendment included that loan, is that correct?

3 A That appears to be correct, yes.

4 Q You indicated you don't know anything about
5 this loan such as where the money came from. Did it come
6 from Mr. Gorman or Dodge at Midlothian?

7 A That's correct. I have no knowledge about it.

8 Q Did you inquire or was it part of the
9 conversation that you had with Mrs. Gorman as to where
10 the money actually came from that funded these loans?

11 A No, I didn't.

12 Q Do you know whether or not Mr. Gorman ever
13 received an assignment of those loans from Dodge at
14 Midlothian or Sales Inc.?

15 A I don't know anything about that, sorry.

16 Q So as of the amendment dated 3-12-03 there are
17 six loans made by Dodge at Midlothian, Sales Inc. which
18 were later amended to reflect Mr. Gorman but six loans
19 totaling \$395,000 to the Gorman Group, is that correct?

20 A That's what this shows, yes.

21 Q Do you have any reason to believe that the
22 Gorman Group did not receive the funds evidenced by these
23 loan items?

24 A I just -- I don't have any knowledge about it

1 at all so if that's what's reported, I have no reason to
2 believe that's not accurate.

3 (Exhibit 4 marked as requested)

4 Q I ask you to review that and tell me what it
5 purports to be.

6 A Okay. This is for the period -- again it's a
7 D2. It's amended report for period July 1 through
8 December 31 of '02 which was filed November 26th of '03.

9 Q And to your knowledge was that document
10 prepared and kept in the normal ordinary course of the
11 business of Gorman Group?

12 A That would be my understanding.

13 Q It was made or prepared on or about the date it
14 bears?

15 A Yes, with the State Board system when you put
16 it in -- so that's the date.

17 Q It actually stamps it and also the time, the
18 hour, minute and looks like the second that it's stamped,
19 correct?

20 A Yes, that's my understanding of the system.

21 Q Do you know what this amendment -- why this
22 amendment was filed?

23 A Well, I think -- because -- if I'm correct this
24 is the same date that the amended D2 was filed for the

1 first six months of calendar year 2002, and so I believe
2 the point of this was to now show these loans as being
3 from Mr. Gorman instead of the two companies as they have
4 been previously reported.

5 Q It now lists also that October loan from Sales
6 Inc. for \$20,000 as now being a Gerald Gorman loan?

7 A That's what this now reports.

8 Q This now lists all six of them in the name of
9 Mr. Gorman?

10 A Yes. May I look at that one moment?

11 Q Yes. Of course.

12 (Exhibit 5 marked as requested)

13 Q Could you please review Exhibit 5 and tell me
14 what that document purports to be?

15 A This -- this is a D2 and it's to -- it's an
16 amended report running from January 16th through June 30
17 of '02.

18 Q So it covers part --

19 A But it was filed -- it's amended report. It
20 was filed March 9 of '04.

21 Q Do you know why it takes January 16th as
22 compared to the original reporting date of January 1, '02
23 through June 30th '02?

24 A I don't know. I don't know specifically.

1 Q Is that a true and accurate copy of the
2 document prepared by the Gorman Group in the ordinary
3 course of business?

4 A It appears to be, yes.

5 Q It was prepared and filed on or about the date
6 that it bears?

7 A Yes.

8 Q This is another amendment to the very first D2
9 report that was prepared on behalf of the Gorman Group,
10 is that correct?

11 A That's what it appears to be. Again I did not
12 prepare -- prepare it, but that would be my understanding
13 of it.

14 Q Do you know what it amends?

15 A My -- again not having prepared it, but my
16 suspicion would be it's amending -- the previous reports
17 had already amended the loans. I would think it's
18 amending the -- what had been previously shown as an
19 expense -- yes, as an expense as a reimbursement to Sales
20 Inc. of that 100,080 and it's now being shown as a loan
21 -- partial loan replacement to Mr. Gorman.

22 Q This is what tries to explain the change in
23 accounting showing that 100,080 distribution changing it
24 from an expense reimbursement to Sales Inc. to a

1 repayment of part of the now combined Gorman loan?

2 A That's my understanding, yes, sir.

3 Q Do you know why this payment is shown as being
4 made on the same date as the original loan was made of
5 June 28th, 2002?

6 A Again not prepared it, I don't know, but I --
7 my assumption would be as I understand the facts that the
8 issue is that even though it says it's an expense to
9 Sales Inc. in reality it was a repayment to Mr. Gorman so
10 they're changing it from Sales Inc. to Mr. Gorman.

11 Q And do you know whether or not the payment made
12 on -- at least designated as being made on June 28th,
13 2002 for \$100,0807 was in fact paid to Mr. Gorman or was
14 it paid to Sales Inc.?

15 A I don't know. I have no knowledge of it.

16 Q That's one of the documents that I asked then
17 -- to clarify about your counsel as to getting a copy of.

18 MR. ROCHE: Which document are we talking?

19 MR. KEYSOR: This is payment of the \$100,080 you and
20 I had talked about previously I believe.

21 MR. ROCHE: Okay.

22 Q That 100,807 payment was applied against the
23 \$110,000 loan originally designated as being made by
24 Sales Inc. but now shows a \$9,920 balance due on that

1 \$110,000 loan?

2 A That's correct.

3 Q Do you know why the records reflect that the
4 payment was made on the same date that the Gorman Group
5 listed the loan as being made on June 28th, '02?

6 A I don't know.

7 Q If you don't know, you don't know.

8 A I don't know.

9 Q Exhibit 6, please.

10 (Exhibit 6 marked as requested)

11 Q Tell me what that purports to be.

12 A This is again an amended D2 semi-annual report
13 for the period July 1 through June -- December 31 of '02
14 and this was filed on March 9th of '04.

15 Q Again was this document prepared in the normal
16 and ordinary course of business of the Gorman Group?

17 A It would appear to be.

18 Q This is a document that was filed with the
19 Board of Elections?

20 A Right, State Board of Elections.

21 Q To your knowledge it's accurate and reflects
22 the financial information set forth therein accurately?

23 A Yes, it certainly appears to.

24 Q Do you know why this amendment was filed?

1 A Again I didn't file it so I don't know. I can
2 only guess that it again has to do with changing.

3 Q This is the form that changes the \$20,000 loan
4 from Dodge at Midlothian to now show it's -- from
5 Mr. Gorman, correct, or at least it does show that?

6 A That's what it does. It shows it's from
7 Mr. Gorman, yes, from Mr. Gorman.

8 Q So now all six loans are shown to be designated
9 from Mr. Gorman, is that correct?

10 A Right, that's correct.

11 Q All of these loans based upon the date of
12 making listed there -- were all made sometime during the
13 year 2002? I think it's second to last page there.
14 Another one right after that.

15 A Yes, that's what this reflects, that's what it
16 states.

17 (Exhibit 7 marked as requested)

18 Q I show you what's marked as Exhibit 7, ask you
19 to review that and tell me what it purports to be.

20 A This is a D2 amended report for the period
21 July 1 through December 31, 2003 which was filed on
22 August 8th of 2004.

23 Q Is that the document that was prepared in the
24 ordinary, normal course of business for the Gorman Group?

1 A Again I did not file it, but that's what it
2 appears to be.

3 Q It appears to your knowledge -- is it accurate
4 as of the date that it was filed with the Board of
5 Elections?

6 A Again I didn't file it. I can only guess that
7 it would be.

8 Q Do you have any reason to believe that it is
9 not accurate?

10 A No, I don't.

11 Q Do you know why this amendment was filed?

12 A I don't.

13 Q There appears to be a partial payment to Gerald
14 Gorman listed. If I can have this, I'll pull it.

15 On page 10 of this exhibit it lists a payment
16 to Gerald Gorman. Do you see that?

17 A I do now, yes.

18 Q What does that reflect?

19 A It's a payment -- it reflects a payment to
20 Gerald Gorman for a thousand dollars and the purpose of
21 which is partial repayment of loan.

22 Q Does it say which loan it's in partial
23 repayment of?

24 A It does not say that on page 10, but that would

1 be reflected on page 12.

2 Q Do you know if Mr. Gorman requested that
3 payment be made on its loan?

4 A I don't know.

5 Q Do you know who authorized that payment?

6 A I don't.

7 Q Do you know who directed or approved that that
8 payment be made?

9 A I do not.

10 Q Do you know why it was paid?

11 A I do not.

12 Q Are there any documents that you know that
13 would be kept by the Gorman Group or your predecessors
14 that would indicate why this amount was paid off on a
15 loan?

16 A I don't have that information.

17 Q Do you know whether or not it was paid by
18 check?

19 A I don't.

20 Q Do you know who made the decision that it was
21 going to be applied against that particular loan that's
22 listed on the last page of that document?

23 A I don't know.

24 Q Can you tell which loan of the six this payment

1 was applied towards?

2 A According to this report it's the loan for
3 \$40,000 which was incurred on January 16th of 2002.

4 Q Did Mr. Gorman request a payment on his loans
5 from the Gorman Group?

6 A I don't know.

7 Q Has he ever made a request for payment that you
8 know of?

9 A Not that I'm aware of.

10 Q Again do you know the terms and conditions of
11 any of these loans that were made?

12 A I do not.

13 Q I take it for all of these loans now you don't
14 know whether or not there was any written documentation
15 of these loans?

16 A That's correct, I do not.

17 Q Were you ever told by Mrs. Gorman or anyone
18 else from the Gorman Group that there were no written
19 documents evidencing these loans other than the line
20 items listed on the D2 forms?

21 A No, I don't recall a conversation like that at
22 all.

23 Q Did you search -- as part of the request to
24 produce documents I asked for any and all documents

1 evidencing the loans. Did you search the Gorman Good
2 Government Group records to see if there were any
3 documents?

4 A None of the documents I had were anything that
5 had anything to do with the loan.

6 Q Did you try and go back before when you became
7 treasurer in what was that, '06, did you inquire, go back
8 or do anything to determine whether or not there were any
9 documents in the Gorman Group's records that would
10 indicate that?

11 A No. I just took what documents that I was
12 given, you know, former checks, you know, basic documents
13 and I didn't have anything like that.

14 Q To your knowledge do you have in your
15 possession all of the documents of the Gorman Good
16 Government Group that would relate to this?

17 MR. ROCHE: I'm going to object to the form of the
18 question, but go ahead and answer it.

19 THE WITNESS: I don't know. I know that all the
20 documents I have there's nothing to do with the loan.

21 MR. KEYSOR: Q Do you know of there being any
22 other documents in anybody else's possession or stored
23 anywhere dealing with the finances of the Gorman Good
24 Government Group?

1 A Not to my knowledge, no, sir.

2 Q That is something that you as the treasurer
3 would know about, is that accurate?

4 MR. ROCHE: Again object to the form of the question
5 but you can answer.

6 Go ahead.

7 THE WITNESS: There's never been a situation where
8 I've had to get into that. You know, there's documents
9 -- the checkbook that was handed over to me at the time
10 and the -- all the records were on the State Board's
11 website if I wanted to follow-up on anything so I had no
12 occasion to ask for anything else.

13 (Exhibit 8 marked as requested)

14 MR. KEYSOR: Q I'm going to ask you to review
15 Exhibit 8, tell me if you've seen that document before.

16 A Yes. This again is a semi-annual report. It
17 appears to be the original report which covers the period
18 July 1 through December 31 of '04 which was filed on
19 January 31st of '05.

20 Q Is that a copy of the document that was
21 prepared by the Gorman Good Government Group in the
22 normal and ordinary course of its business?

23 A Again I did not prepare it. I would assume
24 that it was. It's the document, it has all the markings

1 from the State Board of Election so I have no reason to
2 believe otherwise.

3 Q Do you know why this document was -- is this an
4 amendment?

5 A No, this is the one, the first one.

6 Q If you look -- look at the -- I got the page in
7 front of you the last page of this report. This report
8 now lists all of the loans that were previously listed on
9 these reports you've looked at as having a new date of
10 incurrence now dated January 1, '04. Do you see that?

11 A I do see that.

12 Q Do you know of any reason why the dates those
13 loans were incurred would now be changed?

14 A I don't. I have no idea.

15 Q Did you discuss the date of the loans or the
16 changing of the dates of those loans with Mrs. Gorman or
17 anyone else?

18 A No, I didn't.

19 Q Is this the first time you've seen that the
20 dates were changed from the original loan?

21 A Yes, I never noticed that before.

22 Q So you don't know why it was done?

23 A I do not.

24 Q Now, if you also look the amounts of the

1 original loans have now been changed as well in a couple
2 of occasions?

3 Do you see that?

4 A I'd have to look at one of the former reports.

5 Q Okay. Let's give you Exhibit 7 which lists all
6 six of the loans.

7 A I don't see the difference other than where
8 they've -- Are you talking about the original amounts as
9 opposed to --

10 Q The amounts?

11 A New amounts.

12 Q Under the line item, original amount, let's say
13 for the first one, instead of being \$40,000 which it was
14 listed as originally under the first D2 form it's now
15 listed as 39,000 as the original amount.

16 A I understand your question. Now, yes there is
17 a change.

18 Q Do you know why that change was made?

19 A I do not know.

20 Q It seems to take into account the \$1,000
21 payment that was attributed to Mr. Gorman, and they're
22 now carrying it as an original loan amount of the reduced
23 amount after payment, is that accurate?

24 A That's what these two pieces of paper would

1 indicate to me.

2 Q Do you know why they would change the amount of
3 the original loans to reflect the payments rather than
4 including the pavements in the columns -- in the column
5 that talked about payments?

6 A I have no idea.

7 Q Do you know who did that?

8 A I don't.

9 Q Did you talk with anyone including Mrs. Gorman
10 about that?

11 A I didn't.

12 Q You don't know who made the decision to do
13 that?

14 A I do not.

15 Q Do you know who prepared that document that
16 made those revisions, would that be Mr. Woods?

17 A I think it's Mr. Woods. Again I didn't, but
18 I --

19 Q Do you know where he lives?

20 A He lives at -- in Worth.

21 Q I assume somewhere in the Gorman Group records
22 there is a address for him?

23 A Yes.

24 Q Is he currently employed by the Gorman Group?

1 A No.

2 Q You seemed to hesitate.

3 A Because he's not employed by the Gorman Group.

4 Q Who is he employed by?

5 A He's employed by Cook County and he works for
6 Commissioner Gorman.

7 Q Just like you work as chief of staff. What is
8 his position on her staff?

9 A I forget what the title is. Administrative
10 analyst.

11 Q How long has he held that position? Do you
12 know?

13 A I don't know for sure. I know he's been with
14 the commissioner longer than I have, but I'm not sure
15 when he started with her.

16 Q Was it during the time he was also treasurer
17 for the Gorman Group?

18 A I believe so.

19 Q Do you know -- Strike that.

20 After you became treasurer and took his
21 position as treasurer for the Gorman Group, did he remain
22 in any capacity with the Gorman Group or was he then
23 solely acting on the staff of Commissioner Gorman's
24 staff?

1 A I'm only hesitating because it's a political
2 organization. He is a volunteer for the commissioner in
3 her political organization on his own time, but he does
4 -- doesn't hold a position with the organization if that
5 is clear.

6 Q He doesn't hold a position with which
7 organization?

8 A Gorman Group.

9 Q Okay. Was he ever compensated by the Gorman
10 Group?

11 A I don't know that. I would have to go back and
12 check records. I don't know.

13 Q Is he compensated by Commissioner Gorman for
14 being the administrative analyst on her staff?

15 A He's paid by Cook County for that position,
16 yes.

17 Q He's not a volunteer for that staff position,
18 he is actually paid by Cook County?

19 A He's paid by Cook County, correct.

20 Q Are you paid by Cook County?

21 A Yes, I am.

22 Q In addition to payments as consultant for the
23 Gorman Group?

24 A Correct.

1 Q I'm going to have you review Exhibit 9 and tell
2 me what that purports to be.

3 (Exhibit 9 marked as requested)

4 A This is semi-annual report, July 1 through
5 December 31 of '05. This appears to be the original
6 report because it was filed on January 31, '06.

7 Q That's an accurate copy of the document
8 prepared in the normal and ordinary course of business of
9 the Gorman Group?

10 A It certainly seems to be, yes, sir.

11 Q On page 17 I think you've noticed my mark
12 there, this shows that on November 22nd of 2005, \$5,000
13 was paid to Gerald Gorman as a partial loan payment, is
14 that correct?

15 A That's correct.

16 Q Do you know what or do you know why that
17 payment was made?

18 A I do not.

19 Q Do you know who authorized that payment?

20 A I do not.

21 Q Have you ever been informed as treasurer as to
22 when and why payments would be made to Mr. Gorman on any
23 of these loans?

24 A Can you clarify that question a little bit,

1 please?

2 Q We've gone through a couple payments to
3 Mr. Gorman on these loans. They don't appear to be in
4 any order or timing. Were you ever told or did you ever
5 discuss when and why payments would be made to Mr. Gorman
6 on any of these loans that he apparently made to the
7 Gorman Group?

8 A No. In other words, if there was going to be a
9 pattern or whatever?

10 Q Right. Or if it was simply at the whim of
11 Mr. Gorman or Mrs. Gorman.

12 A Whenever I was aware of a loan repayment which
13 is not any that we've discussed so far, I'm --

14 Q We'll get to them.

15 A Then when the commissioner either said that she
16 wrote a check to Mr. Gorman for a loan payment or
17 requested I do so.

18 Q Can you tell from that page, page 17, which
19 loan this \$5,000 payment was credited to?

20 A You can't tell that from page 17, no, sir.

21 Q You have to look at the Schedule C list of
22 loans.

23 A Correct.

24 Q Can you tell what that was applied to?

1 A This would then show it was applied to the loan
2 that original amount of \$125,000 which on this report
3 shows it was incurred on January 1 of '04.

4 Q But we've seen those aren't the actual
5 origination dates of the loans, correct?

6 A That's correct.

7 Q Do you know what the circumstances were
8 surrounding the payment of that amount?

9 A I do not, no.

10 Q Who would know that, Mrs. Gorman?

11 A I would think so.

12 Q And any payment to Mr. Gorman on these loans
13 that you are aware of, did Mrs. Gorman direct and
14 authorize those payments?

15 A Yes.

16 Q To your knowledge how were any payments made to
17 Mr. Gorman on any of these loans, by check, cash?

18 A The ones that I'm familiar with they were
19 always by check I believe. I can't think of a time when
20 it wouldn't have been.

21 Q Isn't it a requirement by the Board of
22 Elections that all expenses that are paid be documented
23 by check and invoice or there's actually a procedure that
24 you have to follow in order to keep your records?

1 A You have to report it. I don't know -- I'm not
2 familiar there has to be a check or an invoice. It would
3 seem to me there always would be, but I don't know that's
4 an actual requirement by the State Board of Elections.

5 Q You have never seen an invoice for any of these
6 payments even the ones you're familiar with to
7 Mr. Gorman, have you?

8 A No.

9 (Exhibit 10 marked as requested)

10 A This appears -- this is an amended report
11 for -- covering the period January 1 to June 30 of '06
12 which was filed on 5-3-07.

13 Q That was during your tenure as treasurer, is
14 that correct?

15 A Yes.

16 Q Did you prepare this document?

17 A I would assume I did, yes.

18 Q Is that an accurate copy of the D2 amendment
19 bearing the date it has?

20 A It appeared to be.

21 Q It was made in the normal and ordinary course
22 of business?

23 A Yes.

24 Q Of the Gorman --

1 A I'm assuming it was. You want to know why it's
2 amended I bet.

3 Q I'd -- now that it's within your time of
4 treasurer, if you can look at it and see whether or not
5 you can do more than assume that it was prepared by you
6 or if it's accurate.

7 A No, this would have been prepared by me.

8 Q Do you know why this was amended?

9 A I am trying to verify that, but I believe this
10 has to do with what I referred to earlier where the
11 reimbursement part was me. I mean I have to look at the
12 previous report, the original report that was filed for
13 the same period to compare them, but --

14 Q So you believe it was amended to reflect
15 compensation to you?

16 A No, I believe -- I'm trying to -- Do you have
17 the original report that was filed for this reporting
18 period?

19 Q I don't think you provided that. What's the
20 date?

21 A January 1 to June 30 of '06.

22 Q The first one I have from you is 7-1-06 to
23 12-30-06.

24 MR. ROCHE: That's what I have.

1 MR. KEYSOR: Q Again I -- I'm not -- I believe --

2 A May I ask, do you have another one that is --
3 is your next report going to be for the next 6 months of
4 the year also amended on 5-3-07?

5 Q Yes. July 1, '06 through 12-31-06 amended.

6 A Amended 5-3-07.

7 Q That's my Exhibit 11. Would it help you to
8 take a look?

9 (Exhibit 11 marked as requested)

10 A I believe I can explain the situation for this.
11 This was as I mentioned earlier to you that I had filed
12 reports where I showed checks being written to me, but --
13 they were for a reimbursement. In other words, I had
14 paid for perhaps postage or I had paid for, you know,
15 different expenses and the State Board contacted me as
16 treasurer and stated that they wanted that changed. They
17 wanted to reflect where the money really went. So I
18 believe that I had to amend those two reports to then
19 more accurately reflect the expenditures.

20 Q So instead of showing the check going to you to
21 pay several different items --

22 A Items of expenses.

23 Q -- you had to itemize exactly what those
24 expenses were?

1 A Correct, and show the payment like that.

2 Correct. I am almost certain that that is the reason for
3 this amended report.

4 Q Now on this report on the page you're looking
5 at it it also shows more payments being made to
6 Mr. Gorman, is that correct?

7 A Correct, yes.

8 Q How many payments does it show?

9 A There appears to be three payments here.

10 Q What are those amounts?

11 A One for \$750, one for \$2,500 and one for 2,000.

12 Q Why were these payments made?

13 A They are for partial repayment of loan.

14 Q Who requested that they be paid?

15 A Without having the checks in front of me it
16 would either be a matter of the commissioner wrote a
17 check to Mr. Gorman for partial repayment or she directed
18 me to write a check.

19 Q But then she's the only signature on the --

20 A She was the only signature on the account,
21 either she signed the check --

22 Q So whoever made it out, whoever filled in the
23 payee or payor, that sort of thing, it had to be signed
24 by Mrs. Gorman?

1 A Correct.

2 Q You don't know who requested that these
3 payments be made, whether it was Mr. Gorman asking to be
4 paid on his own?

5 A I don't know what -- as far as if I wrote the
6 check out it would be because Commissioner Gorman told me
7 to. I took direction from no one else on that.

8 Q You didn't -- Did you ever inquire of her as to
9 why payment was being made this month as compared to any
10 other month?

11 A No.

12 Q Did you ever inquire as to what -- why these
13 amounts were being paid?

14 A No.

15 Q You just accepted her direction to make a
16 payment or -- a payment was being made to her husband for
17 these amounts for these loans?

18 A For the partial repayment of loan, right.

19 Q Do you know how it was decided which loans
20 would be credited with those payments?

21 A Yes. When I would prepare the report once I
22 was preparing the report I would just -- the way the
23 program works with the state board IDIS program, when
24 you're reporting it as a repayment of loan you have to

1 chose which loan it's being paid for, and I would simply
2 pick one.

3 Q Were you directed which one to pick?

4 A No.

5 Q It was just your choice as to which one of the
6 six that were outstanding you would apply?

7 A Yes.

8 Q Was there any method or manner in your
9 reasoning as to which one would to pick?

10 A I think usually picked the largest one. We'll
11 probably see as you go through these reports, but I think
12 I picked largest one.

13 Q Is there any reason why you wouldn't pick the
14 first one incurred, the oldest loan as compared to the
15 largest loan?

16 A I really couldn't tell you why.

17 Q It looks like the \$750 payment was credited to
18 the \$125,000 loan. Do you see that?

19 A Yes.

20 Q It looks like the \$2,500 payment and \$2,000
21 were credited to \$250,000 loan. Do you see that?

22 A Yes.

23 Q Do you know why you split those up?

24 A I really have no reason for it.

1 Q You weren't directed to do that, again this was
2 purely at your discretion?

3 A Yes.

4 Q Did you ever talk with Mr. Gorman, that's
5 Gerald Gorman, about the loans he had made or the
6 payments that were being made to him on these loans?

7 A No, I didn't.

8 Q Did you ever talk with Mr. Gorman regarding the
9 finances and affairs of the Gorman Group at any time?

10 A No.

11 Q Was he --

12 A Let me clarify that. I'm not saying I had a
13 conversation with him. If there was a fundraiser coming
14 up or --

15 Q Let me rephrase it. Let me rephrase it.

16 Did you ever have any conversations with
17 Mr. Gorman regarding the loans he made to the Gorman
18 Group and the payments that were being made to him by the
19 Gorman Group?

20 A No.

21 This is again the -- it's an amended report
22 that was filed on May 3rd of '07 and it covers July 1
23 through December 31 of '06.

24 Q That was filed on what date with the board?

1 A May 3rd of '07.

2 Q And is that an accurate copy of the original
3 document that was filed with the board and prepared by
4 the Gorman Group?

5 A Yes.

6 Q It was prepared in the normal and ordinary
7 course of the business of Gorman Group?

8 A Yes.

9 Q Did you prepare that document?

10 A Yes, I did.

11 Q Why was this -- Why was the 7-1-06 report
12 amended?

13 A Again without looking at the original report
14 for this filing period, I do believe that the reason for
15 it was as I stated on the previous report that the State
16 Board requested that it be amended to more accurately
17 reflect when I had written checks for reimbursement to
18 myself, that it show where the moneys actually went as
19 opposed to the reimbursement..

20 Q Was it amended at all to show the payments that
21 were made to Mr. Gorman?

22 A No, I don't think that had anything to do with
23 it. It was simply -- yes, because -- yes. It had to do
24 with the way I had previously reported checks to myself

1 which were reimbursements for expenses that I had made.

2 Q This amendment also shows three more payments
3 being made to Mr. Gorman, is that correct?

4 A Yes, sir.

5 Q What were amounts of those payments?

6 A There was actually there were 2 for \$3,000 each
7 and then one for \$1,725.

8 Q So total payments during that reporting period
9 were \$7,725?

10 A That's correct.

11 Q And again why were those 3 payments made?

12 A Again specifically I couldn't say. It would be
13 either that Commissioner Gorman wrote out the check or
14 instructed me to do so.

15 Q When Commissioner Gorman would make out the
16 check, would she tell you she did it or simply you would
17 see it in the checks that -- the checking -- checkbook
18 register?

19 A No. Ordinarily she would tell me that she was
20 going to be doing that.

21 Q Would she tell you why she was making a payment
22 to her husband?

23 A No, I never asked her that question.

24 Q Did it ever --

1 A Wait a minute. She said it was repayment of
2 loan. Why she was making it at that time, I don't know.

3 Q Do you know whether or not Mr. Gorman asked for
4 the payments that are reflected in these three payments?

5 A I have no knowledge of that.

6 Q Would Mrs. Gorman be the only one at the Gorman
7 Group that would have the authority to direct or make
8 those payments to her husband?

9 A Yes.

10 Q Do you know whether or not the payments are the
11 payments were made on the dates that are listed on
12 Exhibit 11?

13 A I would have no reason to believe otherwise
14 because I would have had copies of the checks and the
15 dates listed on checks.

16 Q You would transcribes those dates into your
17 report?

18 A Correct.

19 Q Again what loans were those three payments
20 credited to or what loan?

21 A It appears they were all credited to the
22 \$125,000 loan.

23 Q Again that was at your sole discretion?

24 A Yes.

1 (Exhibit 12 marked as requested)

2 Q I ask you to identify Exhibit 12 for me,
3 please.

4 A Okay. This is semi-annual report January 1 to
5 June 30 of '07 which was filed on July 19th of '07.

6 Q Did you prepare that report?

7 A Yes, I did.

8 Q Is that an accurate copy of the report you
9 prepared in the normal and ordinary course of business of
10 Gorman Group?

11 A It certainly appears to be, yes, sir.

12 Q If you'll turn to page 9 of that report. It
13 again shows some payments being made to Mr. Gorman. Do
14 you see that?

15 A Yes, I do.

16 Q Can you read into the record what payments were
17 made?

18 A On April 6th the payment for \$3,000; on May 3rd
19 of '07, payment for a thousand; June 1, '07, \$1,000;
20 June 14th, '07, \$2500; June 20, '07, \$1300; January 1,
21 '07, \$1500; and February 1, '07, \$2500.

22 Q The total amount of the payments made for that
23 period of time was?

24 A \$12,800.

1 Q Do you know why those amounts on those dates
2 were made to Mr. Gorman on these loans?

3 A I do not.

4 Q Did it have anything to do with whether or not
5 they had enough funds in the Gorman Group checking
6 account during this period of time to warrant making
7 payments on the loans?

8 A I have no idea.

9 Q Do you know whether or not Mr. Gorman requested
10 any of those payments being made to him under his loan?

11 A I don't know.

12 Q Again who had authority, who directed you to
13 make those loans that you -- make those payments that you
14 made if you made any of them?

15 A Again it would have had to have been
16 Commissioner Gorman wrote the check or directed me to
17 write the check.

18 Q Was it again your decision to decide what loan
19 to apply all those payments to?

20 A Yes, it was.

21 Q Can you tell which loan they were applied to?

22 A I applied them all to the \$125,000 loan.

23 Q You were trying to get that loan down, weren't
24 you?

1 A Truthfully I just -- I never gave this any
2 thought because they were all loans to Mr. Gorman. I
3 didn't think it would make any difference.

4 Q If you'll look at the payment of those -- of
5 those loans for that period of time, it appears that in
6 one month, June, there were 3 separate payments to
7 Mr. Gorman, all designated loan repayment and all
8 attributed to the same loan. Why were three separate
9 amounts paid in one month?

10 A I really don't know.

11 Q You never had any conversations with
12 Mrs. Gorman about --

13 A I didn't feel a need. I knew that there was a
14 very large outstanding loan to Mr. Gorman, and if she
15 felt it was time to repay part of that, I didn't think it
16 was my place to ask.

17 Q Did she ever discuss with you any of the terms
18 as she understood them of the loans with her husband?

19 A No.

20 (Exhibit 13 marked as requested)

21 Q Showing you what's been marked as Exhibit 13,
22 ask you to identify it, please.

23 A It's report it's D2 semi-annual report covering
24 July 1 through December 31 of '07 filed on January 22nd

1 of '08.

2 Q If you'll turn to my tab, it appears that it
3 shows that in this time period 3 more payments were made
4 to Mr. Gorman totaling \$8,000, correct?

5 A That's correct.

6 Q Were they all made on the same date?

7 A No, they were -- I'm sorry.

8 Q Could you read in the dates?

9 A There was a check written on July 31, 2007 for
10 \$2500, another on October 5th, 2007 for \$3,000 and the
11 third on November 5th of 2007 for \$2500.

12 Q Do you know whether or not Mr. Gorman requested
13 these payments be made to him?

14 A I do not.

15 Q Do you know whether or not you were directed to
16 make those payments by Mrs. Gorman or whether she
17 prepared the checks?

18 A I'm not -- I'm not certain. It would have been
19 one or the other. I don't know if I wrote it out or if
20 she did.

21 Q And with these payments as you've testified
22 previously she would have been the one to decide, to
23 approve these payments to her husband?

24 A That's correct.

1 Q And did you again apply those two payments to
2 the \$125,000 loan?

3 A Yes, I did.

4 Q On page 15 where it lists the payments, it
5 states, partial payment of loan for FSNB. Do you see
6 that?,

7 A Yes, I do.

8 Q What does FSNB stand for?

9 A This matter also came up in the matter before
10 the State Board of Elections, and it was told to me this
11 notation was simply this is where they were going to
12 deposit those moneys which the FSNB I understand is First
13 Suburban National Bank.

14 Q Do you know why it would be designated where
15 this money would be deposited?

16 A I don't know.

17 Q Were these direct deposited into this account
18 or do you know whether or not these --

19 A Would have been a check written.

20 Q To Mr. Gorman?

21 A Right, yes, that's correct.

22 Q Does it refer it a loan Mr. Gorman had at First
23 National Suburban Bank?

24 A No, it doesn't. My understanding it was like

1 the other loans, the other partial repayment of loan to
2 Mr. Gorman.

3 Q So when it says partial payment of loan for
4 First Suburban National Bank, for First Suburban National
5 Bank does not refer to a loan that's being paid?

6 A Not to my knowledge, no, sir. I was told it
7 was simply where they were going to deposit the moneys.

8 Q Were you told to put that designation in your
9 report or did you do that on your own?

10 A I would -- again I'd have to look at the check,
11 but I would assume that designation was on the check in
12 the memo section and so, therefore, it was included.

13 Q What month would this be for on your bank
14 statements?

15 A July of '07 it was probably the August of '07
16 statement and then October and November I would suspect.

17 Q I haven't previously marked this, but this is a
18 copy of the bank statement as attached to a check.

19 Does that refresh your recollection?

20 A This appears to be a check dated July 31.
21 There is no designation. I can only -- I can only guess
22 that I asked the commissioner what it was for and she
23 must have mentioned it.

24 Q Who prepared the check on that payment, you or

1 the commissioner?

2 A That appears to be the commissioner's signature
3 and her handwriting. It's not mine. I always printed.

4 Q You have the neat print -- not to distinguish
5 against hers, but --

6 A I print --

7 Q There is some neat printing on some of the
8 checks.

9 A I print because I can't -- I have a horrible
10 handwriting. I always print on the checks.

11 Q You're familiar with the -- Elizabeth Gorman's
12 signature?

13 A Yes, I am.

14 Q Just out of curiosity, it looks like the
15 signature -- her signature on the Mr. Gorman's check is
16 different than the signature on the other two checks
17 shown there.

18 A Those are the two checks that are stamped.

19 Q Who has the stamp?

20 A I do.

21 Q You would have stamped those where you made
22 them out -- made out the check she would handwrite her
23 signature in on those checks that she made?

24 A Correct.

1 (Exhibit 14 marked as requested)

2 Q This is semi-annual report, Form D2 covering
3 July 1 through December 31 of '08 filed on 1-20-09.

4 Does this report show any payment or payments
5 being made to Mr. Gorman?

6 A It does. It shows a payment of \$2500 on
7 October 29th of '08 for partial repayment of loan.

8 Q What loan was that applied to?

9 A The one that was originally \$125,000.

10 Q Again I don't think I authenticated this. Is
11 that a document that you prepared?

12 A Oh, yes.

13 Q Did you prepare it in the normal and ordinary
14 course of business of the Gorman Group?

15 A Yes, I did.

16 Q It was filed or prepared on or about the date
17 it bears?

18 A Correct.

19 Q In reviewing this document do you recall
20 whether or not Mr. Gorman requested this payment be made?

21 A I have no knowledge of that.

22 Q Do you recall whether or not you made out the
23 payment to him or was it directed and made out by

24 Mrs. Gorman?

1 A I don't know.

2 Q If it was -- Strike that.

3 This payment would have been authorized or
4 directed only by Mrs. Gorman, correct?

5 A That's correct.

6 Q In this loan as well you decided -- in this
7 payment you decided which loan to apply it to?

8 A Yes, I did.

9 (Exhibit 15 marked as requested)

10 Q Would you please identify Exhibit 15?

11 A Yes. It's Form D2 semi-annual report covering
12 the period of January 1 through June 30 of '09, and it
13 was filed on July 20th of '09.

14 Q Did you prepare this document?

15 A Yes, I did.

16 Q Was this prepared in the normal and ordinary
17 course of business of the Gorman Group?

18 A Yes, it was.

19 Q Does it accurately reflect the financial
20 condition of the Gorman Group at the time it was
21 prepared?

22 A Yes, sir.

23 Q This report -- seems to be four more payments
24 being made to Mr. Gorman.

1 Do you see that?

2 A Yes, I do.

3 Q Could you identify those payments by amount and
4 date they were made?

5 A I will. On March 27th of '09 a payment of
6 \$1800 was made. On January 12th of '09, payment of
7 \$2,000; January 22nd of '09, \$3500; and March 1st of '09,
8 \$1500.

9 Q So total amount of payments made to Mr. Gorman
10 on his loan or loans for this time period -- reporting
11 period was I believe \$8800?

12 A That's correct, yes, sir.

13 Q Did Mr. Gorman request these payments to your
14 knowledge?

15 A No, I have no knowledge of that.

16 Q And who directed these payments to be made?

17 A Either Commissioner Gorman wrote the check
18 herself or directed me to.

19 Q Can you tell which loan these payments were
20 made to?

21 A Yes, it was the same loan for -- that was
22 originally \$125,000.

23 Q Again why that loan?

24 A I don't know.

1 Q It was your discretion?

2 A My own discretion, yes. I'm sorry.

3 Q Were the payments all directed toward that loan
4 because that loan had different payment terms or an
5 understanding that the -- that loan would be paid off
6 before all others that you knew of?

7 A No, no.

8 Q Now this report also shows a new loan. Can you
9 tell us what new loan was made to the Gorman Group?

10 A Yes. There's a loan made on June 26th of '09
11 in the amount of \$70,000 from Carolyn Doody.

12 Q Who is Carolyn Doody?

13 A Commissioner Gorman's mother.

14 Q Had she ever loaned money to the Gorman Group
15 before?

16 A I don't know.

17 Q Not during your tenure, is that correct?

18 A That's correct.

19 Q Do you know why that loan was made?

20 A No.

21 Q Do you know the purpose of that loan?

22 A No.

23 Q Was the Gorman Group running out of money and
24 so needed an infusion of additional funds?

1 A Not particularly. I really don't know why it
2 was made.

3 Q Do you know whether or not that loan was
4 documented in any way?

5 A I had a copy of the check if that's the
6 question.

7 Q Do you know if any note was prepared?

8 A Not to my knowledge, no.

9 Q Was there any loan agreement or term sheet that
10 you saw or knew of?

11 A Not that I'm aware of.

12 Q Did Mrs. Gorman or anyone else discuss with you
13 the purpose or intent of this loan?

14 A Yes.

15 Q What did she say to you and what did you say to
16 her?

17 A It was truthfully -- because it was the end of
18 the reporting period so it would appear there was more
19 money in the account.

20 Q Why was that important to Mrs. Gorman?

21 A Politically important.

22 Q So the loan was purely a device to show more
23 funds in the Gorman Group account than what should have
24 been?

1 A I can't say that. It's simply to show more
2 funds available.

3 Q What is the political reasoning or what is the
4 reasoning for having her mother make this loan to make it
5 look like there's more money in there than before?

6 A I can only guess, but you'd have to -- that
7 would be a decision of Commissioner Gorman.

8 MR. ROCHE: You want me to answer that?

9 MR. KEYSOR: Someone answer it for me.

10 MR. ROCHE: Because --

11 (Off the record)

12 MR. KEYSOR: Q Can you describe for me in your own
13 words what your understanding the reason for Mrs. Doody's
14 loan of -- this was \$70,000 -- this one was?

15 A Correct, yes.

16 Q \$70,000 at the end of this reporting period?

17 A It was so that when the report was filed it
18 would be shown that there was -- that additional \$70,000
19 in the political account.

20 Q And that was for political reasons to show her
21 opponent that she had a larger war chest than she
22 actually had?

23 A It was done so the war chest was larger, yes.

24 Q Was it the intent of Mrs. Gorman to immediately

1 repay this loan once that reporting period was over so
2 that her mother wouldn't be out that money?

3 A It was my understanding that would be repaid
4 very quickly, yes.

5 Q In fact, it was, wasn't it?

6 A Yes, it was.

7 Q It was repaid within ten days of the date that
8 you show it being made, correct?

9 A That's correct.

10 Q Is that legal in your understanding of
11 reporting and --

12 A My understanding it is, it is as long as you
13 report what occurs that it's --

14 Q You can artificially inflate your war chest as
15 your council described it -- and I understand that's what
16 it's called -- you can artificially inflate it for a
17 period of time knowing that you're immediately going to
18 give that money back and that's okay with the disclosure
19 laws as you know them for the Board of Elections?

20 A As far as I know, there's no reason that it's
21 not correct.

22 Q Were any of the loans by Mr. Gorman made for
23 political purposes other than to fund his wife's
24 campaigns?

1 A I really couldn't address that. I wasn't there
2 when the loans were made.

3 Q Do you know where Carolyn Doody got the money
4 that she made this loan with?

5 A I believe they had a line of credit.

6 Q They being the Doodys?

7 A The Doodys, yes.

8 Q Do you know where the line of credit was?

9 A I don't know that.

10 Q Was it First Suburban National Bank?

11 A I don't know, not --

12 Q Do you know where the check came from? It
13 would have come to you, correct, to deposit as treasurer?

14 A I don't know that I deposited that check. I'm
15 really not certain, sir.

16 Q I'll add it to the list, but for the record I'd
17 like a copy of the checks made by the Doodys because
18 there's another one we'll talk about in a minute.

19 Did you receive the check and deposit or is
20 that Mrs. Gorman did?

21 A You know, I honestly do not remember.

22 Q Does she normally make deposits or do you?

23 A When we're in the midst of a fundraiser I
24 generally make the deposits, but she also can as well. I

1 really don't remember if I deposited it or if she did.

2 Q Is there any limit on what an individual can
3 contribute to a political campaign?

4 A No, I don't believe there is, but I believe
5 that there's some change coming on that.

6 Q Do you know whether or not Mrs. --

7 A Can I clarify that a little further? There is
8 a limit for -- there's Cook County ordinance, part of the
9 ethics ordinance where anyone doing business with the
10 County -- there's a limit to how much that party can
11 donate to a candidate, but that's as far as I know the
12 limit of the restrictions.

13 Q Do you know whether or not Mr. or Mrs. Gorman
14 gave or lent this money to Mrs. Gorman's mother to make
15 this loan to the Gorman Group?

16 A No, not to my knowledge.

17 Q I may have asked this, so forgive me, but do
18 you know if there were any documents such as a note, loan
19 agreement or term sheet or anything else to document this
20 loan?

21 A I don't think so. It would be just the copy of
22 the check.

23 Q Do you know what the terms of the loan were?
24 You said you knew it was going to be very short term.

1 What was your understanding of when it would be paid
2 back?

3 A Very shortly. It was all that I knew.

4 Q Was it going to earn interest?

5 A That I don't know.

6 Q Were any of the loans by Mr. Gorman supposed to
7 earn interest?

8 A Again I have no knowledge of that, sorry.

9 (Exhibit 16 marked as requested)

10 Q Ask you to look at Exhibit 16 and identify that
11 for me.

12 A It's Form D2, semi-annual report covering the
13 period July 1 through December 31 of 2009 which was filed
14 on January 20 of 2010.

15 Q Did you prepare this report?

16 A Yes, I did.

17 Q Does it accurately reflect the finances of the
18 Gorman Group as of the date it bears?

19 A Yes, sir.

20 Q Was it made in the normal and ordinary course
21 of business of the Gorman Group?

22 A Yes, it was.

23 Q This report it shows that Carolyn Doody made
24 another loan to the group of \$60,000 on December 31, '09.

1 Do you see that?

2 A Yes. I'm not looking at it, but I know that's
3 the case. Yes, I see it, page 15.

4 Q Was this for the same reason?

5 A Yes.

6 Q It was understood and agreed to your knowledge
7 that this loan, this new loan of \$60,000, would be repaid
8 shortly after the first of the year when there was a new
9 reporting period?

10 A Yes.

11 Q Was this loan in fact repaid?

12 A Yes.

13 Q When was it repaid?

14 A It was within the first week of the new year.
15 I don't have the exact date.

16 Q The purpose of that loan was again to inflate
17 the war chest for purposes of showing her opponent that
18 she had more money than she actually had to run her
19 campaign?

20 A It was to inflate the amount of money in the
21 account, yes.

22 Q To your understanding it was an agreed upon
23 term of this loan that it would be repaid immediately
24 after the first of the year?

1 A That was my understanding, yes.

2 Q Do you know whether or not there were any
3 documents executed to evidence this loan other than the
4 check and the line items shown there?

5 A Not to my knowledge.

6 Q This report also shows that on July 6, '09 the
7 Gorman Group repaid the first \$70,000 loan we had talked
8 about, correct?

9 A Yes, sir.

10 Q That was the check that was made to inflate her
11 war chest for the first reporting period that was paid is
12 it ten days after the loan was made, correct?

13 A Correct.

14 Q Do you know why that money was loaned to her by
15 her mother as compared to her husband? Why didn't he
16 fund the inflated war chest?

17 MR. ROCHE: Do you mean the husband of Elizabeth?

18 MR. KEYSOR: Of Mrs. Gorman.

19 MR. ROCHE: Candidate's father?

20 MR. KEYSOR: Q No. The candidate's husband,
21 Gerald Gorman.

22 A I couldn't say. I don't know.

23 Q The report also shows that there were two
24 payments being made to the Orland Township Republican

1 Organization. Do you see that?

2 A Yes, I do.

3 Q What were -- what's the amount of those
4 payments?

5 A There was one on December 15, '09 for \$2,000
6 and another on December 26th of '09 for \$68,000.

7 Q So total of \$70,000 being paid to the Orland
8 Township Republican Organization?

9 A That's correct.

10 Q If her intent was to inflate her war chest for
11 purposes of scaring her opponent, why in the same month
12 she got a loan from her mother did she send \$70,000 to
13 the Orland Township Republican organization and deflate
14 her war chest?

15 A You'd have to ask the commissioner that.

16 Q She at any time talk to you about that?

17 A Not specifically, no.

18 Q Do you know why those donations were made to --
19 I am going to describe it as the Orland organization from
20 now on if that's okay with you.

21 A Why were those donations made? That's
22 something the commissioner did inform we afterwards. I
23 really didn't discuss it with her.

24 Q What is the Orland Township Republican

1 Organization?

2 A I don't know how to respond to that. That's
3 what it says.

4 Q What's its purpose?

5 A To -- I don't know what their charter says, but
6 I assume to elect Republicans in Orland Township and
7 support Republican candidates.

8 Q Do you know when it was formed?

9 A I don't.

10 Q Are you part of it?

11 A No, I'm not.

12 Q Is Mrs. Gorman part of it?

13 A Yes, she is.

14 Q She's very much a part of it, correct?

15 A She's the Republican committeeman in Orland
16 Township.

17 Q Do you know who the officers are of the Orland
18 organization?

19 A I don't know that.

20 Q Mrs. Gorman is an officer, correct, she's the
21 head of the committee?

22 A I'm presuming -- I don't know because I didn't
23 file any reports. I don't have anything to do with it.
24 I would guess she would be, but I don't know that for a

1 fact.

2 Q As part of your duties as her chief of staff,
3 do you ever attend any of the meetings of the Orland
4 organization?

5 A No, I don't.

6 Q That's outside the scope of your employment?

7 A This is again -- it's a political organization.

8 Q Had she -- Strike that.

9 Had the Gorman Group ever made donations to the
10 Orland organization before?

11 A Yes.

12 Q Are they reflected in these records?

13 A I would think.

14 Q Do you remember any instance?

15 A I think there's been loans in the past.

16 Q That's a loan. This is designated as a
17 donation. Is there a difference between a loan and a
18 donation?

19 A Yes, there is.

20 Q What's your understanding?

21 A You're strictly talking about donation. Then I
22 don't recall.

23 Q What loans were made by the Gorman Group to the
24 Orland organization because I could not see any, but that

1 doesn't mean there aren't any of course?

2 A I would have to go back. Again I'm going to
3 the best of my recollection that there have been times
4 when some small loans have been given so that Orland --
5 the Orland organization could pay certain things like
6 lunches on election day for the judges and things like
7 that. It wouldn't be large amounts.

8 Q Were those loans repaid?

9 A I'm not certain. I'd have to go back and
10 check.

11 Q You have the last -- I believe that's
12 December 31, '09 --

13 A I do not recall any loans or repayments of
14 loans in the last six months so I don't think anything
15 would be reflected on here.

16 Q If the loan was still outstanding, would it be
17 reflected in those records, in Exhibit 16?

18 A No. It would be reflected in the Orland --
19 Orland Township Republican records.

20 Q It wouldn't show that as a --

21 A It's not a debt.

22 Q It's a receivable, it's an obligation, you
23 don't show that on this?

24 A I don't think it shows up on these reports,

1 sir.

2 Q Where would it show up on the records of the
3 Gorman Group?

4 A It would show as an expenditure or a loan when
5 it happens. I don't know that it -- that that reporting
6 system shows --

7 Q I would think you would have to keep some
8 record that the Orland organization owes you money for
9 money that the Gorman Group lent to it.

10 MR. ROCHE: I'm confused. So the question is if the
11 Orland Republican Group owes the Gorman Good Government
12 money, that's got to be tracked somewhere.

13 MR. KEYSOR: How do they keep a record of it?
14 That's my question.

15 MR. ROCHE: I got you.

16 THE WITNESS: If you look at this cover sheet
17 there's no section for that so I don't know if that's a
18 deficiency in the state board's procedure because it has
19 to be reported, but it doesn't appear to actually show up
20 here anywhere on a cumulative basis.

21 MR. KEYSOR: Q Well, it could certainly be
22 itemized under other receipts, other receipts itemized,
23 not itemized?

24 A I'm sure it would be -- in the timeframe that

1 the report's covering, but I don't know -- it doesn't
2 seem to keep a cumulative --

3 Q Do you recall any time period where a loan was
4 made to the Orland organization?

5 A I would have to go back and look. I know -- I
6 believe there have been some.

7 Q That's a document I would ask that you look
8 for.

9 A Okay.

10 Q Any and all loan --

11 MR. ROCHE: Want to take a break?

12 THE WITNESS: No, I'll just do it real quick.

13 MR. KEYSOR: Q So I would ask you to go through the
14 Gorman Group records and find any documentation either in
15 the D2 forms, the schedules attached that you said --
16 Schedule A or whatever that you referred to earlier that
17 may not be part of what we have here today --

18 MR. ROCHE: Could we agree you'll send me and I'll
19 work with you to get the documents? Can we agree to
20 that?

21 MR. KEYSOR: Yes.

22 Q But any documents that you can think of so you
23 can start looking.

24 Now on this particular report it's shown as a

1 \$70,000 donation. How is that different in your mind or
2 understanding as the treasurer of the Gorman Group
3 compared to what you indicated were loans previously
4 made?

5 A Well, at times with -- if loans were made you
6 have a hope of perhaps getting the money back at some
7 point in time. With a donation I don't think you
8 anticipate that.

9 Q Do you know why a \$70,000 donation which under
10 your terms they have no hope of getting back would be
11 made?

12 A It's not a decision I make. The commissioner
13 did that.

14 Q To your knowledge has the Gorman Group ever
15 made a donation or loan to any other organization
16 including the Orland organization in the amount of
17 \$70,000?

18 A Not to my knowledge, no.

19 Q Or any amount near that amount?

20 A No.

21 Q You don't know why, for what purpose this was
22 made to the Orland organization?

23 A Again that's a decision the commissioner made.

24 Q Do you know whether or not it was made because

1 someone had received or knew they were going to receive
2 the citation in these proceedings?

3 A I don't know.

4 Q The \$68,000 donation was made on December 26th,
5 2009 which was after a date that our citation was
6 received by the Gorman Group. Do you know if that
7 prompted this donation to be made to deplete the coffers
8 of the Gorman Group?

9 A I hadn't received the citation by that date
10 so --

11 MR. ROCHE: Just a point. Does it say donation on
12 that \$70,000?

13 MR. KEYSOR: Yes. Two donations are itemized, one
14 for \$2,000, and I don't know -- I don't want to testify
15 for you.

16 MR. ROCHE: Whatever it says, whatever it says.

17 MR. KEYSOR: Q One is for \$2,000 made
18 December 15th, 2009. It says purpose, donation. And
19 then December 26th, 2009, purpose donation -- \$68,000, is
20 that correct?

21 A That's correct, yes.

22 Q Are you aware that Carolyn Doody was served
23 with the citation on December 24th, 2009?

24 A I didn't know that.

1 Q What was her position with the Gorman Group?

2 A She was chairman of the committee.

3 Q Did you have any conversations with her
4 regarding any of the loans made with Mr. Gorman?

5 A No, I didn't.

6 Q Did you have any conversations with her
7 regarding donations made to the Orland organization?

8 A No, I didn't.

9 You're referring to Mrs. Doody, right?

10 Q Yes.

11 A No, I did not.

12 Q I think you said you had no conversations with
13 Mrs. Gorman regarding this donation.

14 A Not prior to the donation, no.

15 Q What about subsequent, any conversations you
16 had?

17 A Obviously I found out about it afterwards
18 because I had to report it.

19 Q Who made out the check for that?

20 A Commissioner Gorman.

21 Q Did she tell you why?

22 A I asked her about it after the fact. I was
23 concerned about it having -- because I didn't know about
24 this until afterwards.

1 Q What was your concern?

2 A Well, because on the 27th I received that
3 citation to discover assets and didn't quite know what
4 that meant, and then knowing that moneys had been
5 transferred -- check had been written on the account.

6 Q What did she say to you?

7 A She said just wanted money moved out of that
8 bank.

9 Q Did she say why?

10 A No.

11 Q So her reason was not that the Orland
12 organization needed the money or she was making a
13 charitable donation to this organization, she just wanted
14 the money moved out of that bank?

15 A Yes.

16 Q Did inquire further as to why?

17 A No.

18 Q Did you ask her whether or not it had anything
19 to do with this citation?

20 A I didn't carry on the conversation any longer.

21 Q Do you have any understanding as to why she
22 wanted it moved out of the bank?

23 A No.

24 Q Are you continuing to put money into that bank

1 account or have you changed banks?

2 A She may have made another deposit into that
3 account, but this isn't the time of year that we would
4 take much money in. There's not a fundraiser or anything
5 going on right now.

6 Q Have you changed bank accounts?

7 A We have opened another bank account, yes.

8 Q What was the reason for opening a new bank
9 account?

10 A She wanted a new bank account. She wanted a
11 different bank.

12 Q Why?

13 A She didn't say.

14 Q Was it because of this citation?

15 A I didn't specifically have that conversation.

16 Q Is it your understanding?

17 A It would be my guess but -- I shouldn't say
18 that. She wanted a different bank. I think they had
19 some issues with the bank in the past.

20 Q What issues did they have?

21 A I don't know, but it just seemed as though --

22 Q As treasurer did you have any issues with the
23 bank?

24 A No.

1 Q Do you know of any political or business reason
2 why the Gorman Group would make a donation of \$70,000 to
3 the Orland organization?

4 A Not specifically, no.

5 Q It's not something they had done before?

6 A Not to my knowledge, no.

7 Q Do you know if there's any agreement between
8 Mrs. Gorman or the Gorman Group and the Orland
9 organization to return that money once these citation
10 proceedings are over?

11 A I have no information on that.

12 Q Who is in charge of the finances for the Orland
13 organization? Is it Mrs. Gorman?

14 A I honestly don't know. I'm not involved in
15 that organization or that account.

16 Q Do you know whether or not she has control or
17 direction over how money is spent just like she has with
18 the Gorman Group?

19 A I don't know. I'm not involved with that.

20 Q Is there anybody currently working with her on
21 her staff that is also part of the Orland organization?

22 A I don't know that -- I don't know.

23 Q Is there anyone working on -- for the Gorman
24 Group that's also working for her or for the Orland

1 organization?

2 A Well, again it's a political organization so
3 someone -- there could be someone involved with the
4 Orland organization that also supports her as Gorman Good
5 Government, but again I have nothing to do with the
6 Orland Republican organization.

7 Q I understand, but do you know if anyone is
8 doing both?

9 A I couldn't say. I really -- I just don't know.

10 Q I'm also going to ask you to produce, and I'll
11 put in my request, but the bank statements and checks for
12 January and February of this year, plus any documentation
13 with respect to the new or any other bank accounts that
14 the Gorman Group has opened.

15 A Okay.

16 Q The Doody loan of \$60,000 made December 31 of
17 '09, were any of those proceeds used to make the donation
18 to the Orland organization?

19 A No. If you look at the timeframes you'll see
20 that -- no. The loan from Mrs. Doody --

21 Q Was after?

22 A Was after the moneys to Orland Township.

23 Q Did the Gorman Group have sufficient funds to
24 repay not only Mrs. Doody's loan of \$60,000 and also make

1 the donation to the Orland organization?

2 A Yes.

3 Q How much money is left over?

4 A I don't know. I'd have to check. There's not
5 a lot in that account though.

6 Q How much is in the new account?

7 A I think maybe few hundred dollars, minimal
8 amount.

9 Q How much is in the old account do you know?

10 A I think very little. I think it would be.

11 Q That's basically been depleted?

12 A That's my -- yes.

13 Q And has it been depleted because of these
14 citation proceedings?

15 A I couldn't answer that.

16 Q Were you told to --

17 MR. ROCHE: You're not the only one suing me, you
18 know. Check the records. There's a whole list of
19 people.

20 MR. KEYSOR: I can see why.

21 MR. ROCHE: He's got the biggest amount.

22 MR. KEYSOR: Q Were you told to deplete the funds
23 in the old account?

24 A No, and I'm incapable of doing that. I'm not a

1 signator on the account.

2 Q The old account was with First Suburban
3 National Bank?

4 A That's correct.

5 Q Where is the new account?

6 A Citibank.

7 Q Which branch?

8 A It was opened at the downtown branch on 69 West
9 Washington.

10 Q Now, according to the last report that's been
11 filed by the Gorman Group, which is Exhibit 16, is that
12 correct, this would be the last document?

13 A Yes. There would have been some AIs filed.

14 Q What's an A1?

15 A If you receive anything -- \$500 or more within
16 30 days prior to the election you have to file an A1 and
17 there were I think 2 or 3 AIs filed. Just someone wrote
18 a check for \$55 so you have to report that.

19 Q Do you know how much were those donations or
20 those contributions that you had to report on A1 after
21 January 1, 2010?

22 A I can't remember if I had to file 2 or 3, but
23 it was no more than 3, and they were I think each \$500.

24 Q Nothing over a thousand?

1 A No. I don't believe so. Basically yes, this
2 is the latest report.

3 Q According to this last report that's been filed
4 as far as a D2 report, what is the amount that is shown
5 that is due and owing to Mr. Gorman from the Gorman
6 Group?

7 A According to this report it's \$303,845.

8 Q I'd ask you to recalculate it. I think that
9 Mrs. Doody's \$60,000 or \$70,000 --

10 A Yes, it does. So it would be \$243,845.

11 Q Is that amount correct according to the books
12 and records of the Gorman Group?

13 A Yes, I believe so.

14 Q That amount is currently due and owing from the
15 Gorman Group to Mr. Gorman?

16 A That's my understanding, yes, sir.

17 Q Is it your understanding that the Gorman Group
18 is going to cease taking in donations and putting money
19 into its accounts as a result of this citation or any
20 other reason?

21 A I have no information on that right now.

22 Q You've not been told one way or the other when
23 you met with her to discuss your examination?

24 A The new account is in name of Gorman Good

1 Government Group. It's in the same name.

2 Q Was any money transferred from your First
3 Suburban account into the new account?

4 A No.

5 Q Have any further payments been made to
6 Mr. Gorman on his loans?

7 A No.

8 Q Have any other payments been made or moneys
9 given to the Orland organization since December 31, 2009?

10 A I do not believe so.

11 MR. KEYSOR: I have no further questions.

12 MR. ROCHE: We'll waive signature.

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1 STATE OF ILLINOIS)
2) SS:
3 COUNTY OF C O O K)

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5 The within and foregoing deposition of the
6 aforementioned witness was taken before CAROL CONNOLLY,
7 CSR, CRR and Notary Public, at the place, date and time
8 aforementioned.

9 There were present during the taking of the
10 deposition the previously named counsel.

11 The said witness was first duly sworn and was
12 then examined upon oral interrogatories; the questions
13 and answers were taken down in shorthand by the
14 undersigned, acting as stenographer and Notary Public;
15 and the within and foregoing is a true, accurate and
16 complete record of all of the questions asked of and
17 answers made by the forementioned witness, at the time
18 and place hereinabove referred to.

19 The signature of the witness was waived by
20 agreement of counsel.

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The undersigned is not interested in the within case, nor of kin or counsel to any of the parties.

Witness my official signature and seal as Notary Public in and for Cook County, Illinois on this 2nd day of March, A.D. 2010.

Carol Connolly
CAROL CONNOLLY, CSR, CRR
CSR No. 084-003113
Notary Public
311 South Wacker Drive
Suite 300
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