

BEFORE THE HEARING SUBCOMMITTEE
OF THE INTERIM LEGISLATIVE ETHICS COMMITTEE

In re: Representative Carl Trujillo,

Respondent.

DEPOSITION OF DANIEL ABRAM

November 9, 2018

10:00 a.m.

Jackson, Loman, Stanford & Downey, P.C.

201 Third Street, Northwest

Albuquerque, New Mexico

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

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REPORTED BY: B. Julian Serna
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1 (Note: Deposition in session at 9:59 a.m.)

2 DANIEL ABRAM

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

5 EXAMINATION

6 BY MR. LOMAN:

7 Q. Good morning.

8 A. Good morning.

9 Q. Tell us your full name, please.

10 A. Daniel Steven Abram.

11 Q. Mr. Abram, I appreciate you being here on
12 relatively short notice. You ever been in a deposition
13 before?

14 A. I have not.

15 Q. All right. So let me give you some ground rules
16 and kind of explain what we're doing here today. Mostly it's
17 kind of a question and answer session. You've just given the
18 oath to tell the truth. So in that respect it's just like
19 testifying in a courtroom, although you're in a less formal
20 setting here.

21 We have a court reporter who is taking down every word
22 we say. He'll produce a transcript of the deposition. So
23 for his benefit, we have some ground rules like if it's -- I
24 need verbal answers. So if it's a yes-or-no question, I need
25 you to say "yes" or "no" instead of "uh-huh" or "huh-uh," or

1 just shaking your head.

2 A. Gotcha.

3 Q. And we will all sort of remind you as we go.

4 A. Sure.

5 Q. We're not trying to bust your chops. We just want
6 a clean record. If I ask a poorly worded question, which is
7 almost certain to happen, if you don't understand my question
8 for any reason, let me know. I will do my best to rephrase
9 it, but if you answer a question, we'll all assume you
10 understood it; is that fair?

11 A. Sure.

12 Q. We're not going to be here all day. If you need to
13 take a break at any point, just let me know. Use the
14 restroom, get a cup of coffee, whatever, just let me know.

15 A. I was told that we would be out by about noonish.

16 Q. I think I told you that.

17 A. Yes.

18 Q. Yeah, yeah.

19 A. I just have an appointment at 2:00.

20 Q. And I don't think that will be a problem.

21 A. Cool.

22 Q. But if you need a break at any point, just let me
23 know --

24 A. Thank you.

25 Q. -- and we'll take one. Only caveat there is if

1 there's a question pending, I will ask you --

2 A. Get through that.

3 Q. -- answer it before we go. Where do you work, sir?

4 A. At Animal Protection of New Mexico.

5 Q. And what is your current title?

6 A. Deputy director.

7 Q. How long have you been with Animal Protection?

8 A. Since 2010, so eight years.

9 Q. Okay. What was your title when you joined that
10 organization?

11 A. Deputy director.

12 Q. Has your job changed in any substantial way from
13 then to now?

14 A. I think the -- not significantly. I have kind of
15 become officially the HR administrator just by default,
16 because no one else that will assume that role can -- you
17 know, can't assume that role, and I think that's about the
18 only major change since the beginning.

19 Q. When did you assume those HR duties?

20 A. Well, I always kind of had a role in that, but we
21 kind of made it official, I'd say -- I don't know -- about
22 five years ago or so.

23 Q. All right. Did you have HR experience before you
24 came to this organization?

25 A. I did.

1 **Q. What experience?**
 2 A. Not as an HR manager, but an executive director of
 3 another nonprofit organization, and I spent three years at
 4 the village of Tijeras as the clerk treasurer, and I assumed
 5 HR duties in that role as well.
 6 **Q. Okay. Does APNM have written HR policies or a**
 7 **written HR manual?**
 8 A. We have an employment manual, yes.
 9 **Q. And that covers all of its HR policies and**
 10 **guidelines?**
 11 A. It does. In fact, we just ratified a new, more
 12 comprehensive one a few months ago.
 13 **Q. Okay. Was that because of what's happened this**
 14 **year with Laura Bonar?**
 15 A. No, it was not; had nothing to do with that. It
 16 was because the employment manual we were using was sadly
 17 outdated and was silent on a lot of issues that would come up
 18 at the workplace.
 19 **Q. Okay. All right. That HR manual that was just**
 20 **replaced, did that exist when -- is that the one that was in**
 21 **use when you joined in 2010?**
 22 A. The one that was replaced? Yes.
 23 **Q. Okay. And I assume that's given to all employees**
 24 **when they start?**
 25 A. Correct.

1 A. To report it to the management.
 2 **Q. And that would be whom? Whom in management?**
 3 A. Myself, and the executive director Lisa Jennings.
 4 **Q. Okay. And what would happen once that complaint**
 5 **was lodged according to this policy?**
 6 A. I'd have to have the policy in front of me. I
 7 don't have it offhand, but I'd presume that there would be
 8 some kind of investigation.
 9 **Q. That would be reasonable.**
 10 A. I think the current one states that explicitly,
 11 that there be an investigation into a claim.
 12 **Q. Other than what we're here to talk about with**
 13 **Ms. Bonar and Carl Trujillo, have you ever had an APNM**
 14 **employee report a complaint of sexual harassment to you?**
 15 A. No.
 16 **Q. Okay.**
 17 A. Can I walk that back?
 18 **Q. Yeah.**
 19 A. Actually, I just recalled an incident. It probably
 20 took place about a year ago. I'm sorry that I didn't
 21 remember that at the beginning.
 22 **Q. No. That's okay.**
 23 A. Our office manager, her name is Ivory Conrad,
 24 reported to me that the building superintendent who works for
 25 Berger Briggs had -- smiled at her in a way that made her

1 **Q. Or at least made available to them somehow?**
 2 A. They sign a document stating that they've received
 3 and will comply and understand the manual and will comply,
 4 and we do training with the staff to address anything that
 5 might be confusing.
 6 **Q. Okay. And I've been told that between APNM and**
 7 **APV, there are approximately 20 employees. Does that sound**
 8 **about right to you?**
 9 A. That is correct. Well, let me clarify APNM has all
 10 the employees. APV has zero employees.
 11 **Q. Okay. But many APNM employees do work --**
 12 A. Work on behalf of the (c)(4), correct.
 13 **Q. Okay. All right. The HR policy that was in effect**
 14 **before this year or before this new -- when was this new one**
 15 **adopted?**
 16 A. That's a good question. I'd say I think sometime
 17 in September.
 18 **Q. Okay.**
 19 A. August or September.
 20 **Q. Okay.**
 21 A. So pretty recently.
 22 **Q. All right. So the policies that were in force**
 23 **before that, what did they instruct or encourage employees to**
 24 **do if they had a sexual harassment complaint against**
 25 **somebody?**

1 uncomfortable and at one point touched her back, and so I
 2 spoke to Lisa Jennings, our executive director about that. I
 3 called the superintendent into my office to discuss that, and
 4 he vehemently apologized. He didn't deny anything, but he
 5 said it was probably misunderstood. Lisa Jennings told me
 6 that, you know, you should definitely talk to the
 7 superintendent about it just to clarify.
 8 **Q. Lisa told you that you should talk to him, right?**
 9 A. Uh-huh. Yeah.
 10 **Q. Okay.**
 11 A. Which I did, and he was embarrassed and very
 12 apologetic, and he didn't think that -- he didn't remember
 13 doing anything inappropriate, and I informed Ms. Conrad that
 14 I discussed this with the superintendent and that he was
 15 apologetic, and I asked her what -- you know, what she would
 16 like to see to make this right, and she said, "Well, it's
 17 fine," if we could basically eliminate contact with the
 18 superintendent. So I called the superintendent back. Should
 19 I state his name, or does that not matter?
 20 **Q. You don't have to.**
 21 A. Yeah. I called the superintendent back for a
 22 second time, called him into the office and said that for
 23 matters relating to the building, please contact me before
 24 you come to the office and to make sure that I'm at the
 25 office to greet you when that happens, and so that's kind of

1 been the MO ever since, and that action seemed satisfactory
2 to Ms. Conrad, our office manager.

3 **Q. Okay. So that -- you considered that issue to have
4 been resolved at that point?**

5 A. And there's been no other incidents or complaints
6 since that time.

7 **Q. Okay. Was it reported to Berger Briggs, or did you
8 just deal with the superintendent?**

9 A. I just dealt with the superintendent, and I said to
10 the superintendent that if another incident is reported to
11 me, I will have to go to the management of Berger Briggs and
12 discuss it.

13 **Q. Sure. Okay. Thank you for that.**

14 A. Sorry. I didn't -- it slipped my mind.

15 **Q. No, and it brings up another good point. As we go
16 along, I'm going to ask you what I'm going to ask you about,
17 and if you don't remember something and something jogs your
18 memory later, absolutely please pipe up.**

19 A. Thank you. I appreciate that flexibility.

20 **Q. Yeah. Let us know, so we can go back and fill in
21 whatever holes. Thank you for that.**

22 **So other than that, have you had any issues with sexual
23 harassment at APNM?**

24 A. No.

25 **Q. All right.**

1 A. Oh, and just to add to that incident, not only did
2 I discuss that with the executive director, but I also spoke
3 to our risk management company at Poms and Associates about
4 that incident as well. So Steve Meilleur, who is your
5 consultant there, would have a recollection of me discussing
6 that incident with him.

7 **Q. So my very next question was going to be whether
8 you discussed that with Poms.**

9 A. I did, yeah. So I followed his advice as well.

10 **Q. And he gave you some guidance on how to deal with
11 that situation?**

12 A. Yeah, which is basically direct contact with the
13 superintendent to clarify what happened.

14 **Q. So as you probably know, Ms. Jennings was here
15 earlier this week sitting in that seat talking to me as well.
16 So I understand that you've been dealing with or using Poms
17 as sort of an HR consultant for some time; is that fair?**

18 A. The Poms and Associates model is that if you move
19 your organizational insurance policies into their wheelhouse
20 as a brokerage, they'll provide you with free HR
21 consultation, free trainings, management trainings, yeah,
22 just you can call them any time to consult about anything HR
23 business related, and it's been very helpful.

24 **Q. I'm sure. How long have you had that relationship
25 with Poms?**

1 A. About three years now, three to four years. I
2 didn't expect any questions as such, so I'm sorry if I don't
3 have specific dates for you about when we entered into those
4 relationships. I can certainly provide those later.

5 **Q. I don't need the exact date. Yeah, that's fine.**

6 **Are you primarily the point of contact with Poms on these HR
7 issues?**

8 A. Primarily, yes.

9 **Q. Okay. Looking for an approximation here, how many
10 times do you think you've called them to run an HR issue by
11 them in the last three years?**

12 A. At least a dozen times.

13 **Q. Okay.**

14 A. If not more.

15 **Q. Without -- I don't need details or names, but just
16 give me a sense of what types of issues you would call to run
17 by Poms and Associates?**

18 A. Oh, they're things like, for example, clarification
19 about what constitutes an exempt versus a nonexempt employee,
20 so when we're bringing in someone new, we get that
21 classification correct. There was a couple situations where
22 we misclassified a position, and it was exempt when it really
23 should have been nonexempt hourly, so that would be a
24 situation where I call him, we correct the situation,
25 actually provide the employee with back pay, and clarify that

1 we made a mistake, that kind of thing. Yeah, I mean, just
2 questions about HR law and just questions about how to handle
3 interpersonal situations that might arise --

4 **Q. Sure.**

5 A. -- go to Poms. I mean, if we -- if Lisa and I --
6 you know, we meet regularly, weekly, and if there's something
7 that comes up that we kind of don't know how to handle, we'll
8 say, "Call Steve at Poms and see what he has to say."

9 **Q. Other than being the HR person at APNM, what other
10 duties do you have?**

11 A. Well, I'm basically the business manager for the
12 organization. I handle all of the insurance policies. I
13 oversee communications. I have two employees that I oversee,
14 a marketing director and a communications associate. I
15 oversee some program work. I oversee, for example, our
16 humane education program. I oversee our plant-based eating
17 program. Basically everything administrative.

18 **Q. You say you oversee the communications. Do you
19 manage the social media accounts for the organization?**

20 A. You know, I'm not particularly social media savvy.
21 So I leave that expertise to the people who are, but yes,
22 I'll meet regularly with my communications team. The way we
23 handle media is -- actually, even though I oversee those
24 employees, we handle media kind of collectively, and we meet
25 every two weeks and have a dedicated meeting about the social

1 media email blasts, press releases, print media. Anything
2 that's going to be coming out in the next several weeks we
3 discuss, change the timing on, so on and so forth, assign
4 roles, and we do that -- we do that meeting every two weeks
5 with the executive team, which we call our chiefs like our
6 chief development officer, our chief financial officer, and
7 the marketing director, the Com's associate.

8 One of our program directors is involved in those
9 conversations. Ms. Bonar, our chief program and policy
10 officer, is involved in those conversations. So we're kind
11 of a team effort when it comes to planning outreach, media
12 outreach.

13 **Q. Better to leave social media to the millennials?**

14 A. Don't get me started.

15 **Q. All right. Okay. When did you first meet Laura
16 Bonar?**

17 A. She actually was one of the individuals that
18 interviewed me for the job along with Lisa Jennings and two
19 of our board of directors.

20 **Q. She preceded you at APNM?**

21 A. She did.

22 **Q. Okay. You were based out -- you work in the
23 Albuquerque office?**

24 A. I do.

25 **Q. And I understand that there was not a Santa Fe**

1 **Q. Okay. That's pretty specific. How do you know it
2 was that day?**

3 A. Well, I take notes whenever I meet with our
4 executive director.

5 **Q. I don't want to beat around the bush here. I'm
6 going to hand you -- I want you to know that your doodles
7 have gotten a lot of compliments in this case. We'll call
8 this Exhibit 1.**

9 **Do you need a copy of his notes?**

10 MR. HNASKO: I think I have those here. I brought
11 them.

12 MR. LOMAN: I can print out a copy.

13 MR. HNASKO: That's okay. I gathered what I could,
14 what I thought would have references to Daniel.

15 MR. LOMAN: Yeah.

16 **Q. (By Mr. Loman) Okay. Mr. Abram, I just handed you
17 five or six pages which we've marked as Exhibit 1 to this
18 deposition. And these are some handwritten notes. Are these
19 your handwritten notes?**

20 (Note: Exhibit 1 marked.)

21 A. They are.

22 **Q. On this first page dated 2/27/18, is that your
23 handwriting below?**

24 A. Yeah. This is all my handwritten, my chicken
25 scratch.

1 **office until fairly recently?**

2 A. Yeah, about three years ago.

3 **Q. Three years ago. Okay. Before all of Carl
4 Trujillo -- before the Carl Trujillo matter arose, had Laura
5 Bonar ever complained to you about sexual harassment in any
6 form or context?**

7 A. No.

8 **Q. How close were you with Laura Bonar? That's a
9 terrible question.**

10 A. Well, we're close, and we work well together,
11 always have. I have a lot of respect for Laura's work ethic
12 and her integrity, and she's a very bright, intelligent
13 individual, and we've always worked quite well together.

14 **Q. Do you have a relationship with her outside of
15 work?**

16 A. No.

17 **Q. Okay. That's really what I was asking. Like I
18 said, it was a terrible question.**

19 A. No. We've never engaged socially outside of work.
20 I mean, we have at APNM and APV events, but that's work, but
21 other than that, we never -- I think we had lunch once
22 outside of the office.

23 **Q. All right. When did you first hear that Ms. Bonar
24 had some type of issue with Carl Trujillo?**

25 A. I believe it was on February 27th.

1 **Q. It looks to me like the date 2/27/18 was written in
2 definitely with a different writing utensil.**

3 A. It was written after, because I had to reconstruct
4 -- sometimes I fail to date my notes, and when I do, it's
5 like that, but so I consulted with Lisa and said, "When did
6 we meet," and --

7 **Q. All right.**

8 A. And actually what I do, just so you know, a little
9 before this actually is I started utilizing Evernote for my
10 notes, for my paper notes, so I take pictures of my notes,
11 and then I keep them in an Evernote file, and then I date the
12 name of the file. So that's why you see the date at the top
13 there as well.

14 **Q. Okay. So the typed portion up top, "What is Poms,
15 who talked with and when," those --**

16 A. Those are my typed notes into the Evernote
17 application. You can add text to whatever you put in a note,
18 which I do sometimes.

19 **Q. All right. Well, up there it says on your
20 typewritten notes, it says, "Talked to Tom and Tad." Were
21 you talking to Tom and Tad as early as February?**

22 A. No. I think I added that after the fact just to
23 keep everything in one place.

24 **Q. Okay.**

25 A. Probably I was -- I think what happened was I was

1 -- I don't know when I typed those in frankly. It wasn't on
2 2/27. It was probably after the fact when Lisa said you
3 might need to talk to Tom and Tad, Tom Hnasko, and I don't
4 remember Theresa's last name. I never spoke to her, but I
5 think that's why I typed that in is she said I may have to be
6 talking to these people.

7 **Q. Okay. So feel free to look at your notes there to**
8 **help jog your memory as we go along here, but tell me what**
9 **happened on February 27th?**

10 A. This was just a meeting between myself and Lisa
11 Jennings, and it was basically Lisa Jennings informing me
12 that she had received a -- this information about sexual
13 harassment from Laura Bonar, and she wanted me to know -- as
14 the HR person, to start building the documentation for it,
15 and that was really my only involvement is to build the
16 documentation for what was being told to Lisa.

17 **Q. Okay. Did you have any details at that point?**

18 A. No. The only details are what you see here, which
19 is that Lisa was -- Laura informed Lisa that she was harassed
20 by Representative Trujillo some five or six years ago, and
21 that she then -- we just spoke about her quandary about what
22 APNM's obligations to follow up would be, and you can
23 probably see in that blob right there, it says, "Talk to see
24 Steve" with a little square next to it. I put a little
25 square next to things I need to do. So she said, "Well,

1 A. No, I had not.

2 **Q. So tell me about your March 2nd conversation with**
3 **Steve.**

4 A. So I took my cell phone into the corridor that
5 leads to the basement for privacy, and I just told him what
6 had been disclosed. I knew very little at that point, just
7 that Laura Bonar had told Lisa Jennings that Representative
8 Trujillo had sexually harassed her, and so I wanted to find
9 out from Poms per Lisa what our next steps would be, what our
10 obligations as an organization would be, and Steve basically
11 first said, "Well, you need -- well, you need to treat this
12 as a -- like a complaint from an employee, and you need to
13 make sure that you protect your employee from any further
14 exposure to the individual."

15 For example, if we were to hold an event where
16 Mr. Trujillo might be in attendance or speak, we would
17 prevent Laura from being at that event.

18 In the -- in the meeting with Lisa on the 27th -- I
19 don't think it's reflected in the notes -- there's something
20 about a personal apology, but Lisa, I think, told me that she
21 asked Laura what would it take to kind of make you whole, and
22 do you want an apology from Representative Trujillo, and I
23 think Laura had said that she did want an apology. So I
24 conveyed that on to Steve.

25 **Q. You said "did" or "didn't"?**

1 let's talk to Poms and Associates to find out what our
2 obligations might be," and that's essentially what that
3 meeting was.

4 **Q. And then the bottom of the notes are kind of cut**
5 **off. I see the word "Budget," though. Does that have**
6 **anything to do with the Laura Bonar situation, or were you**
7 **starting to take notes on something else?**

8 A. I think I started taking notes on something else,
9 and it got snapped in the picture.

10 **Q. Did you talk to Steve from Poms that day?**

11 A. No. I talked to him some days later, on March 2nd.

12 **Q. Is that the next note that we have here?**

13 A. Yes, and I accidentally wrote 2/2 instead of 3/2,
14 because I made a mistake. So I corrected it in my notes, but
15 that's why you see a "3" in different writing there. You can
16 go in to annotate a note, and that's what I did.

17 **Q. Between February 27th and March 2nd, do you recall**
18 **having any conversation with anybody about this Laura Bonar**
19 **matter?**

20 A. No. In fact, I was -- I had -- I had called Steve
21 probably on the same day, which is what I usually do when I
22 get a directive from Lisa, and he was unavailable to talk
23 until that date in March.

24 **Q. As of March 2nd, had you spoken with Laura Bonar**
25 **about this at all?**

1 A. "Did" at that time want an apology from
2 Mr. Trujillo, and so Steve took that as -- Steve Meilleur
3 said, "Well, since Lisa asked Laura what would it take to be
4 whole and would she like an apology, it could be construed as
5 kind of an obligation on APNM's part -- APNM's part to follow
6 up on an apology."

7 So he suggested that in addition to protecting Laura
8 from exposure to Mr. Trujillo, that Lisa might directly
9 confront Representative Trujillo, and he suggested some
10 language about how to say it. It was like, well, you know,
11 we're not casting any judgment about what happened, but we
12 want you to know that this was disclosed to us. So that was
13 a suggestion, a follow-up because she said she did want --
14 Laura said she did want an apology. He said that, you know,
15 since you asked that, and she said yes, if you do nothing, it
16 could be seen as negligence on APNM's part.

17 And -- yeah, and then he said kind of an unhelpful
18 suggestion at the end, which was that if you do invite
19 Representative Trujillo to an event and he's in support of
20 your work, that you don't praise him as an individual for
21 that gesture, but you only praise the work that he's
22 supporting, which I don't know if -- that seemed kind of
23 unhelpful, but --

24 **Q. Okay.**

25 A. That was kind of the extent of the conversation,

1 yeah.

2 **Q. So on page 2 of Exhibit 1 here, there's a**
3 **highlighted portion where it looks like it says, "No way of**
4 **knowing what is true."**

5 A. This is Steve. I'm sorry to interrupt.

6 **Q. Yeah.**

7 A. "No way of knowing what is true, what's not."

8 **Q. So these are Steve suggestions?**

9 A. Suggestions of language that Lisa might use to
10 confront Representative Trujillo.

11 **Q. And I'm not trying to bust your chops here, but so**
12 **that Julian only has to take down one voice at a time, even**
13 **if you know what I'm going to say, let me finish before you**
14 **start, and I will do my best not to talk over you.**

15 A. My apologies.

16 **Q. Okay. And going on to the next page, we're still**
17 **on your March 2nd call with Steve, right? "Alternatively, if**
18 **Laura"? Do you see that?**

19 A. Uh-huh.

20 **Q. Is that still that same conversation with Steve?**

21 A. Yeah.

22 **Q. Okay.**

23 A. Again, it was kind of like -- I mean, this was so
24 new. So I think Steve was probably not aware that ties would
25 be, you know, severed with Mr. Trujillo after such an

1 accusation. So that was him just saying, you know, if Laura
2 is uncomfortable around him, that she could not go to the
3 event with him there.

4 **Q. Okay.**

5 A. But he also said like we have kind of an obligation
6 to prevent that kind of contact. So it was back and forth a
7 little bit, you know.

8 **Q. Uh-huh. So I'm trying to understand how you gave**
9 **Steve the context for this phone call, though, because you at**
10 **this point still don't know really what Laura is claiming**
11 **happened, right?**

12 A. All I know, you know, at this point is that Laura
13 told Lisa that she was sexually harassed by Carl Trujillo and
14 that Laura asked -- Lisa asked Laura, pardon me, what we can
15 do to make her whole and does she want an apology, and Laura
16 said yes, and then Lisa instructed me to call Steve and tell
17 him that much, which is what I did.

18 **Q. You would agree with me that sexual harassment can**
19 **occur in many different forms and ways?**

20 A. As we see in the media every day.

21 **Q. Sure. Okay. So when you called Steve and said**
22 **what you just recounted, did he ask for details? Did he want**
23 **to know what's going on to give some context?**

24 A. He didn't really ask for any details about the
25 nature of what happened. If he did, I didn't write it down,

1 and if he did, I didn't have any.

2 **Q. Okay. All right. So after that phone call with**
3 **Mr. Meilleur -- I know he's going to ask, so could you spell**
4 **Meilleur for us?**

5 A. M-e-i-l-l-e-u-r.

6 **Q. Thank you. After that conversation with**
7 **Mr. Meilleur, what did you do?**

8 A. I just relayed what we discussed with Lisa
9 Jennings.

10 **Q. Okay. Did you take any other action?**

11 A. No, and I wrote down, "Next step, talk to Steve on
12 the phone with Lisa." We did not do that. We didn't end up
13 doing that.

14 **Q. Okay.**

15 A. That was the only conversation I had with Steve
16 about this.

17 **Q. Okay. Your next entry looks like it's March 16th,**
18 **2018?**

19 A. Uh-huh.

20 **Q. Yes?**

21 A. Yes, sir. Sorry.

22 **Q. Thank you. You don't have to call me, sir, but we**
23 **do need a "yes." Okay. So I understand you had a meeting**
24 **with Laura and Lisa on March 16th, right?**

25 A. That's correct.

1 **Q. In between this March 2nd call to Steve and this**
2 **meeting on March 16th, did you learn anything about this**
3 **allegation or talk to anybody about it?**

4 A. No.

5 **Q. All right. Okay. Tell me about this meeting on**
6 **the 16th, please.**

7 A. Lisa called this meeting so that I could document
8 the details of the claim that Laura was making against
9 Representative Trujillo. As she would say from an HR point
10 of view, so we capture the information.

11 **Q. At this point, I see there's a note down here about**
12 **Julianna Koob. Well, you say "Ku." I assume that's "Koob"?**

13 A. I didn't know how to spell it at that time.

14 **Q. Yeah. Prior to this meeting on March 16th, did you**
15 **know that Lisa or Laura had discussed this with Julianna Koob**
16 **at all?**

17 A. No. That was the first time I -- I believe -- I
18 believe that was the first time that I was aware of this
19 person, which would indicate the name misspelling.

20 **Q. Okay.**

21 A. I think that Lisa and Laura were trying to reach
22 out to resources to guide them through next steps is my
23 understanding.

24 **Q. Which is why you called Steve at Poms?**

25 A. Right. So that was my role to say well, let's talk

1 to the risk management people. Meanwhile we'll reach out to
2 this Julianna Koob who has expertise in sexual harassment
3 issues, because I believe as my note indicates, that she
4 lobbies on behalf of victims, lobbies for bills that address
5 that. That's about the extent of my knowledge of Ms. Koob.

6 **Q. Did Steve Meilleur or anyone else suggest to you**
7 **that you should go outside the organization to find somebody**
8 **to talk about --**

9 A. No. That was Laura and Lisa, and I -- I think that
10 meeting happened, but I was not involved in it.

11 **Q. From an HR perspective, did it seem odd to you that**
12 **they would take it outside of your organization and go to**
13 **another lobbyist about it?**

14 A. Not at the time, and I suppose not now. I think
15 it's reasonable to seek professional resources that are
16 willing to help.

17 **Q. Okay. So feel free to refer to your notes, but**
18 **take me through this meeting on March 16th.**

19 A. So I reiterated the one point that Steve made.
20 You'll see that third bullet point down that APNM has an
21 obligation to make sure that Laura is not in a physical space
22 with Mr. Trujillo and to get the details of the incident that
23 Laura's describing. Lisa asked her to talk about them in
24 this meeting in a detailed way so that I could capture it for
25 her personnel file. And so that's what happened.

1 **Q. I don't want to interrupt you, but I want to jump**
2 **in here. Off to the side of your notes here, it says, "And**
3 **Karen." Who is Karen?**

4 A. I do not recall.

5 **Q. Okay.**

6 A. I apologize. I don't -- I don't remember who that
7 might be.

8 **Q. If the honest answer is "I don't remember," then**
9 **that is it. That is an acceptable answer.**

10 A. Okay.

11 **Q. All right. So I'm sorry. You can pick it up**
12 **there.**

13 A. Oh, right. Okay. So then Laura relayed the
14 details of three encounters with Representative Trujillo, the
15 first in 2013 when we were advancing an animal cruelty bill,
16 HB -- I don't remember the bill number -- 22 maybe or --

17 **Q. I'm sorry. Before we get there, we skipped over --**
18 **you've got some notes here about, "Concern was about our**
19 **endorsement, et cetera." Do you see that?**

20 A. I think, yes. Sorry.

21 **Q. No, that's okay. And then the last bullet point**
22 **there it says, "Not interested in talking about it publicly."**
23 **Is that Laura expressing that interest?**

24 A. That whole block of scribble there was me capturing
25 Laura speaking and her saying that obviously she is concerned

1 about APV endorsing a candidate that has questionable ethical
2 standards, and she has concern about, you know, his judgment
3 and use of power, and then she said that -- she said in that
4 moment that she's not interested in going public with this
5 accusation.

6 **Q. Okay. Prior to this coming up with Ms. Bonar, had**
7 **you ever -- had you ever met Carl Trujillo?**

8 A. Not been formally introduced. I don't think I've
9 ever shaken the man's hand, but he's attended events that
10 we've had at the APV office in Santa Fe and spoken. I think
11 he even spoke at one of the grand openings of that office.

12 **Q. Okay. Prior to February 27th, did you have any**
13 **reason to doubt his ethical standards?**

14 A. No. I really didn't know much about Mr. Trujillo,
15 and I sometimes struggle to keep up with the APV side of
16 things, because I'm not -- that's not my role, and yeah, so
17 I'm not really engaged in the politics part of the -- arm of
18 the organization.

19 **Q. By that, does that mean you're not a lobbyist; is**
20 **that right?**

21 A. Just because of my role in the organization I
22 register as a lobbyist in case I'm ever asked to give
23 testimony or whatever, but I never have to date.

24 **Q. Okay.**

25 A. I think the other reason that I'm registered as a

1 lobbyist is because I organize the APV lobby day, which is a
2 huge effort that we have to advance our bills. We call in a
3 hundred or so volunteers, and we train them how to lobby
4 their own representatives and senators, and we teach them
5 about the bills that we're advancing. We teach them how to
6 write letters to their legislators, and then we feed them
7 lunch and then march them over to the roundhouse, and they go
8 meet their legislator and hand them the letters. So I
9 organize that whole event, which is probably why I'm asked to
10 be a registered lobbyist.

11 **Q. Okay. So back to this 2013 incident that Ms. Bonar**
12 **relayed to you, what do you recall her telling you about**
13 **that?**

14 A. Yeah, so the first incident she said -- and this is
15 all her speaking, so note that, but she said that in 2013,
16 when we were advancing our animal cruelty bill, he said that
17 she -- he didn't -- he was speaking to her and said that he
18 didn't realize that she was up here so often and that they
19 should -- suggested they should have dinner sometime.

20 **Q. Okay.**

21 A. And I think Laura said something to the effect of,
22 you know, at the time it seemed like an innocuous comment.
23 They were exchanging paperwork, and that's when he said, "Oh,
24 I didn't realize you were up here so much, and could we have
25 dinner," or "Should we have dinner." I wrote, "Should,

1 should go have dinner sometime." I imagine that's kind of
 2 exactly what she said, because I put quotes around it.
 3 **Q. Okay. At the time she told you that she didn't**
 4 **find it offensive or problematic?**
 5 A. Yeah. I think -- like I said, I think she said it
 6 seemed like an innocuous comment at the time, because it was
 7 the first incident of three, and so as the other incidents
 8 occurred, she probably noted that one because it's
 9 significant that she should be asked to dinner by a
 10 legislator.
 11 **Q. Okay. Before we go on to no. 2, do you recall**
 12 **anything else that she told you about that incident?**
 13 A. No.
 14 **Q. Okay. So the next one you have, "2014," and on**
 15 **no. 2, tell me what Ms. Bonar relayed to you there.**
 16 A. Working on our spay/neuter bill, she went to a
 17 committee hearing in public affairs, the public affairs
 18 committee, and she was looking for a place to sit down. She
 19 saw an open seat by Representative Trujillo. She asked, "Can
 20 I sit down next to you?"
 21 And he commented that -- she said that he commented
 22 that, "You can sit down next to me any time, by the pool, at
 23 night, at home, by the fire," and then she said she left the
 24 room.
 25 **Q. Okay.**

1 A. And at that point she said that she found that
 2 disturbing and that if something like that happened again,
 3 she was planning some kind of a response on the ready for him
 4 if he made an inappropriate comment to her like that again.
 5 **Q. Okay. Was this comment made, based on what she**
 6 **told you, during this meeting? Was that comment made before**
 7 **the hearing had begun?**
 8 A. I don't know. I don't know if she came into the
 9 hearing room before or after the hearing had already started
 10 or not. I don't know.
 11 **Q. Okay. And then she related to you he made this**
 12 **comment to her, and then she got up and left the room?**
 13 A. Yeah. She said she tried to show no reaction and
 14 left the room.
 15 **Q. Okay. Did she say whether she's attended any more**
 16 **of the committee hearing or testified or did anything, took**
 17 **any other action?**
 18 A. Other than thinking about how she would respond if
 19 it happened again.
 20 **Q. Okay. Before we go on to the next one, do you**
 21 **recall anything else that she told you about that incident at**
 22 **that time?**
 23 A. No.
 24 **Q. And then you've got your next one dated February**
 25 **5th?**

1 A. Uh-huh.
 2 **Q. What did Ms. Bonar tell you there?**
 3 A. So this is where outside of the house chambers, he
 4 -- she said that he pulled her aside and whispered to her,
 5 "Where can I meet you this weekend?" And that's like kind of
 6 -- that's in quotes, and the "pulled me aside part," that's
 7 the extent of what she said. I don't know the nature of the
 8 pulling aside. I don't know if there was physical contact or
 9 not. She just said, "Pulled me aside." I mean, that could
 10 mean touching you and pulling you aside. That could be
 11 motioning to pull you aside. I don't know. She just said,
 12 "He pulled me aside and whispered."
 13 **Q. She didn't describe a, you know, grabbing, sort of**
 14 **violent grabbing of her body?**
 15 A. Not at that time or that meeting and not
 16 subsequently to me.
 17 **Q. Did she tell you during that meeting at the time**
 18 **that it was February 5th? Specifically you've got that in**
 19 **your note.**
 20 A. Yes. That's why I wrote that down.
 21 **Q. Okay. I assumed that. That's reasonable. So --**
 22 **and this would have been in 2014 is what she's talking about,**
 23 **right?**
 24 A. That's what I wrote.
 25 **Q. Okay. So we're sitting here in March of --**

1 A. Yeah, because it was the next session. Right.
 2 **Q. Okay. So we're sitting -- you were sitting in a**
 3 **room with her in March of 2018, and she could tell you**
 4 **specifically that it was February 5th, 2014, that this**
 5 **incident occurred?**
 6 A. Uh-huh, and I think -- and I think that she said
 7 that because there was an email exchange.
 8 **Q. Okay. So let's pick it up there. He pulled her**
 9 **aside and whispered, "Where can I meet you this weekend," and**
 10 **what did she say after that?**
 11 A. She gave the response that she had planned, which
 12 was that her boyfriend's family was sick and that she needed
 13 to be there this weekend to help take care of them.
 14 **Q. Looks like your notes sort of got cut off here.**
 15 **Are we missing a line or two of your notes?**
 16 A. Would you object to me opening my phone?
 17 **Q. Not at all.**
 18 A. I may have the note available.
 19 **Q. Okay.**
 20 A. Sorry. It's taking some time to open.
 21 **Q. Take your time.**
 22 A. That's not working.
 23 **Q. Okay.**
 24 A. But I think that that's all that it really says.
 25 Wait. Hold on. Now, I got it. Oh, it's cut off here, too,

1 because that's how I photographed it. Sorry.

2 **Q. Okay.**

3 A. But I think that's pretty much the extent of what I

4 said is she relayed her planned response.

5 **Q. So she told you that she told Carl Trujillo that**

6 **her boyfriend's -- her boyfriend has a sick family member,**

7 **and that was her reason why she couldn't hang out with him**

8 **that weekend?**

9 A. Correct.

10 **Q. Okay. And then what did -- well, did she describe**

11 **his response to that statement?**

12 A. I didn't write anything down, but I think she

13 mentioned that he gave her a frown or a strange look. That's

14 what I recall.

15 **Q. Okay.**

16 A. I didn't write that down, but I do kind of have a

17 recollection of her saying that he, again, gave me a strange

18 look, like a disappointed look.

19 **Q. And then what?**

20 A. And then I think they parted company --

21 **Q. Okay.**

22 A. -- as far as I understand or remember.

23 **Q. Okay. Do you recall any other details about that**

24 **encounter that she related to you?**

25 A. I don't.

1 **Q. Okay. All right. Then looks like you started a**

2 **new note on your notepad there still dated March 16th, right?**

3 A. Yeah, and that's when she relayed that after that

4 last incident, he ceased communications, stopped returning

5 calls to her -- from her and kind of stopped communicating

6 with APV.

7 **Q. Okay. And then the bottom line there, I can make**

8 **out, "Jeff: He came out of restroom." Does that have**

9 **anything to do with this?**

10 A. No, no, and the only thing -- the only other thing

11 that has to do with this is underneath where I've scratched

12 out notes, that didn't relate to this issue. I left that in

13 where it says, "Most concerned about Carl."

14 **Q. Hold on. So we're going on to the next page now?**

15 A. Yeah.

16 **Q. Okay.**

17 A. And at that time, I left this part in, because she

18 said regarding Carl, that she was no longer interested in an

19 apology from him, because she didn't feel it would be

20 meaningful.

21 **Q. Okay. Were you asked by anyone to redact this**

22 **portion of your notes?**

23 A. No. I did that, because there was conversation

24 regarding a different matter in that meeting that was just

25 not related.

1 **Q. Okay. Will you tell me what that was about now?**

2 A. I'd really prefer not to, because this doesn't

3 relate to this matter.

4 **Q. Okay. So in this two weeks that had passed, Laura**

5 **had gone from "I want an apology" to "I do not want an**

6 **apology," right?**

7 A. That's what I recall, yes.

8 **Q. Do you recall any discussion during this March 16th**

9 **meeting about whether she wanted to make her allegations**

10 **public?**

11 A. Because at the beginning she did not want to make

12 her allegations public, and I'm sorry, but at some point it

13 was understood to me, I think -- okay. I'm going to have to

14 search my memory now. I think it wasn't until May possibly

15 -- anyway, I wasn't really involved in further conversations

16 about the matter. At some point and a date I can't recall,

17 Lisa said that she was going -- Lisa told me that she was

18 going to go public with the allegation, and this could all be

19 checked via Facebook, because at that time Lisa was preparing

20 for educating her staff about how to react after Laura went

21 public with the allegation if we were contacted by the media,

22 and so -- and I think that was sometime in early May.

23 **Q. This was after she had published the letter?**

24 A. And I think the letter -- well, can you tell me

25 when the letter was published? Was it like March?

1 **Q. May 2nd.**

2 A. May 2nd. That does actually ring a bell, and

3 probably that's just about the time when Lisa distributed

4 instructions for the staff to refer all communication to our

5 Facebook page, just referring to a statement that we posted

6 on our Facebook page, which said something to the effect of,

7 you know, this allegation was made by one of our employees,

8 and we believe the employee.

9 **Q. If I understand you correctly, and please do**

10 **correct me, you don't recall if it was just before or just**

11 **after the open letter was published, but it was right around**

12 **the same time? Is that what you're saying?**

13 A. Lisa knew that Laura was going to publish an open

14 letter, and at that time in preparation before the open

15 letter was published, I believe, or just absolutely

16 concurrent with, she said we have to -- I remember it being

17 kind of like urgent, you know, like, "We need to deal with

18 this right now. We need to -- I drafted this statement.

19 We're going to post it on Facebook. I want everyone to know

20 that if they're contacted by the media, to refer them to the

21 Facebook statement."

22 **Q. Do you remember how much notice Lisa Jennings had**

23 **that this letter was going to be published? Did she know a**

24 **week before or two weeks before?**

25 A. I don't know. I really wasn't involved in the

1 conversations.

2 **Q. Before we get to that, I'd like you -- let's go**

3 **back to your notes, and then at the bottom -- so we're on the**

4 **last page of this Exhibit 1. At the bottom, I can't tell if**

5 **you meant to redact this or highlight it, but it looks like**

6 **it's, "Adobe Acrobat Pro. Ask Lisa" -- something, and then**

7 **below that I see, "Julianna Koob, lobbyist for ACLU." Do you**

8 **recall why you were talking about Julianna Koob at that**

9 **point?**

10 A. I really don't.

11 **Q. Did you ever discuss any of this with Julianna**

12 **Koob?**

13 A. No. I've never met Julianna Koob.

14 **Q. Okay. You note that she was a lobbyist for the**

15 **ACLU. Does that help you remember why you were taking notes**

16 **about her?**

17 A. No. I mean, all I remember about Julianna Koob is

18 that she has experience with these kinds of cases as a

19 lobbyist, so I was told.

20 **Q. We've been going about an hour. So let's take a**

21 **break.**

22 A. Great.

23 (Note: Deposition in recess at 10:57 a.m.

24 and reconvened at 11:04 a.m.)

25 **Q. (By Mr. Loman) So I think you just testified to**

1 **this, so forgive me, but I think you said after this March**

2 **16th meeting, you didn't have much involvement in anything**

3 **having to do with Laura Bonar and Carl Trujillo; is that**

4 **true?**

5 A. Yeah. Yes.

6 **Q. Did you have anything to do with the APV board's**

7 **decision not to endorse Carl Trujillo?**

8 A. I was present at the meeting. I'm present at all

9 board meetings.

10 **Q. Okay. Are you a member of the board?**

11 A. No. I'm an employee.

12 **Q. Right. Are you aware that Laura, Lisa, and**

13 **Julianna Koob met on March 19th?**

14 A. I didn't know the date, but I was aware they met.

15 **Q. Okay. Did you discuss that meeting before or after**

16 **with anyone?**

17 A. No. That meeting was not discussed with me. It

18 was only discussed at the beginning that perhaps they'd be

19 reaching out to that individual for advice.

20 **Q. Okay. After that March 19th meeting, though, Lisa**

21 **Jennings or anyone didn't come to you and tell you what they**

22 **had talked about or debrief or tell you, "Here's what's going**

23 **on with this"?**

24 A. No, not that I recall.

25 **Q. Did you follow up with Laura or Lisa or anyone to**

1 **talk about what we're doing with this -- with these**

2 **allegations?**

3 A. I believe the only further involvement I had was

4 when I was made aware that Laura was going to make these

5 allegations public and that there would be strict protocols

6 surrounding communication, that I recall.

7 **Q. During that March 16th meeting with Lisa and Laura,**

8 **I think you mentioned this, that you or somebody asked Laura**

9 **to write it up. Do you recall getting a memo from Laura**

10 **Bonar about all of this?**

11 A. Yes, I did get a memo from Laura addressed -- if I

12 recall, it was addressed to me and Lisa, and I think she

13 misspelled my name.

14 **Q. She does, and that's been a source of confusion for**

15 **us.**

16 A. Yeah. There's no "S."

17 **Q. All right. Am I right that there's a newscaster,**

18 **somebody named Dan Abrams?**

19 A. I don't know if it's Dan. Maybe. I actually don't

20 watch the mainstream news. I'm an NPR guy.

21 **Q. Well, I just handed you what I marked as Exhibit 2.**

22 **Is that the memo?**

23 (Note: Exhibit 2 marked.)

24 A. Yeah. Yes.

25 **Q. At the end of it, it's dated March 19th. Is that**

1 **-- do you think March 19th is when you received this memo?**

2 **It would have been three days after your meeting with her.**

3 **Does that seem right?**

4 A. Yes.

5 **Q. Do you know if this memo was drafted before or**

6 **after Laura Bonar's meeting with Lisa and Julianna Koob,**

7 **which would have also been on March 19th?**

8 A. I don't know. I assume it would be after, but I'm

9 not sure.

10 **Q. Well, don't assume. If you don't know, you don't**

11 **know, and that's fine.**

12 A. Okay.

13 **Q. Okay. Going on to the second page of this -- well,**

14 **first, let me ask you, how is this memo given to you? Did**

15 **you get it by email? Was it handed to you?**

16 A. It was a hard copy handed to me for her

17 confidential personnel file.

18 **Q. And I assume you put it in that file?**

19 A. I did.

20 **Q. Did you do anything else with it or discuss it with**

21 **anybody?**

22 A. No.

23 **Q. Okay. In the second page at the top, she's**

24 **describing this encounter that you've described where he**

25 **pulled her aside, Carl Trujillo pulled her aside at the**

1 roundhouse and asked, "When can we meet," and she gave the
2 rehearsed line about her boyfriend, right?

3 A. Uh-huh.

4 **Q. And you've told me about that. And she says here,**
5 **"He did not say anything in response, but his face was**
6 **expressive, showing what looked like frustration and hurt as**
7 **I walked away."**

8 **Is that consistent with what she told you during the**
9 **March 16th meeting?**

10 A. Yes.

11 **Q. Okay. Do you recall anything that she told you**
12 **during that March 16th meeting that's different than what I**
13 **just read to you?**

14 A. I'm referring to my notes to see how I -- or if I
15 describe that. I did not. I'm -- that's what I remember.
16 It is consistent with what she wrote. I don't know if she
17 used the exact words, but it was consistent with what she
18 wrote.

19 **Q. Okay. You may have already said this, so I**
20 **apologize, but the open letter came out sometime in the**
21 **morning of May 2nd. So knowing that, do you remember when**
22 **you first learned that there was going to be an open letter**
23 **to be published?**

24 A. Definitely before that.

25 **Q. Okay.**

1 A. But I don't remember how long before that.

2 **Q. Okay. Could it have been a day before or a week**
3 **before?**

4 A. Probably days before.

5 **Q. Okay.**

6 A. And it would have been as simple as Lisa informing
7 me that that was the decision that Laura made. Really
8 anything after that was just conversation with Lisa, and I
9 think that was about the only one other than "She's going to
10 make the allegation public, and here's what I need you to
11 do," in terms of communication with the media.

12 **Q. Okay. As the HR director for the organization, did**
13 **you have any concerns about her approaching it in this**
14 **fashion; meaning, Ms. Bonar making this allegation public?**

15 A. No.

16 **Q. Did you see a -- did you see the open letter or a**
17 **draft of the open letter before it was published on the Brava**
18 **website?**

19 A. I don't believe so. I'm pretty sure I did not.

20 **Q. Okay. Do you recall reading it that day on May 2nd**
21 **after it was published?**

22 A. Yes.

23 **Q. Okay. Since May 2nd, have you had any**
24 **conversations with Laura Bonar about the letter and its**
25 **contents?**

1 A. No.

2 **Q. Where do you sit -- I've never been to your office**
3 **here in Albuquerque, and I'm trying to get a sense of the**
4 **layout. Do you have your own office with a door?**

5 A. I do.

6 **Q. Does Laura Bonar have her own office with a door?**

7 A. She does.

8 **Q. How far apart are your offices?**

9 A. Adjacent.

10 **Q. Are you mostly in the office Monday through Friday**
11 **during normal business hours?**

12 A. Yes.

13 **Q. Is she?**

14 A. Her hours are a little different. She typically
15 comes into the office a little later, not always, but on
16 maybe several days, maybe three days a week, she comes in
17 around the 10:00 o'clock hour.

18 **Q. Okay. Sounds like you see her most workdays?**

19 A. There are some days when she works from home.
20 Actually there's some days that I work from home, but I would
21 say that I see her most workdays, yes.

22 **Q. And your offices are adjacent, and earlier this**
23 **morning, you described a good working relationship with her?**

24 A. Yes.

25 **Q. But you've never discussed the open letter or her**

1 **allegations against Carl Trujillo?**

2 A. No.

3 **Q. Have you discussed the open letter or Ms. Bonar's**
4 **allegations with Lisa Jennings since May 2nd?**

5 A. Not -- we've not discussed the details of the
6 letter. I mean, all that was discussed was, you know, like
7 I've already stated, that she was making these allegations
8 public and that we were to restrict communication with the
9 media.

10 **Q. Okay. Have you ever met Gene Grant?**

11 A. Yes.

12 **Q. And in what context?**

13 A. I first met him at an event in Santa Fe at the
14 Lensic when I first -- it was actually before my first day of
15 employment. I attended an event at the Lensic just to help
16 out, to be supportive. I'd already been offered the job. So
17 I went to the event to help and be supportive, and I believe
18 Gene was there, and I remember saying, "You're the guy from
19 TV," because I'd watched him on TV, and there was a funny
20 exchange, and then subsequent, in the next couple three years
21 subsequent to that, I'd see him picking up Laura or just
22 coming to the office and just a handshake here and there, but
23 very little contact with Gene.

24 **Q. So when you met him that time at the Lensic, was he**
25 **there as Laura's date, as her boyfriend, or was he there in**

1 some other capacity?

2 A. Yeah, he was -- I believe he was there -- I didn't

3 know it at the time. I didn't realize that they were dating

4 at the time. I just thought he was a guest.

5 Q. Were you ever -- I'm sorry.

6 A. And then after, you know, some time of employment,

7 I realized that they were a couple.

8 Q. Have you ever discussed any of Laura Bonar's

9 allegations against Carl Trujillo with Gene Grant?

10 A. No. I haven't had any contact with Gene Grant for

11 a couple of years at least.

12 Q. Okay. At any point have you discussed Ms. Bonar's

13 allegations with Jessica Johnson?

14 A. No. There have been a few offhanded, you know,

15 comments from Jessica about Carl and -- you know, our

16 executive team meetings, just, you know, kind of derisive,

17 but I have not had a conversation with Jessica in any form

18 about any of this.

19 Q. Were Jessica Johnson's derisive comments about Carl

20 Trujillo before or after the open letter was published?

21 A. Oh, well, after. After all this had come out.

22 Q. Prior to Ms. Bonar making these allegations against

23 Carl Trujillo, were you aware of any issue that Jessica

24 Johnson had with Carl Trujillo?

25 A. No. I really did not discuss any of this with

1 anyone except for Lisa, and I think I've already relayed the

2 conversations I've had -- the extent of the conversations

3 I've had with her.

4 Q. Are you aware that you've been identified as a

5 witness by Mr. Hnasko for the charging party in this case?

6 A. As the what?

7 Q. So Mr. Hnasko's been appointed or has been

8 identified, whatever word we use, as the charging party in

9 this case, kind of like the plaintiff in this case, I would

10 say.

11 A. I see.

12 Q. He's identified you as a witness. That's why I'm

13 here asking you all these questions.

14 A. Right. That's why I'm here.

15 Q. Other than what we've discussed this morning, are

16 you aware of anything that you're being called to testify

17 about?

18 A. Outside of this particular issue?

19 Q. Outside of what you and I have already discussed

20 this morning. In other words, part of this is me trying to

21 understand what it is you're going to say at the hearing when

22 you're called as a witness. What I'm asking is, is there

23 anything that we haven't discussed that you think you're

24 going to be asked about at the hearing?

25 A. There's nothing that comes to mind. Nothing I can

1 imagine at this point.

2 Q. All right. Let's take five.

3 (Note: Deposition in recess at 11:18 a.m.

4 and reconvened at 11:21 a.m.)

5 MR. LOMAN: I don't have any more questions for

6 you, and I appreciated you being here this morning.

7 THE DEPONENT: Of course.

8 MR. LOMAN: You have the right to read and sign

9 your deposition transcript, which means the court reporter

10 produces a transcript, and you get to check it to make sure

11 there are no transcription errors.

12 THE DEPONENT: Okay.

13 MR. LOMAN: You can do that, or you can waive that.

14 What would you like to do?

15 MR. HNASKO: I recommend you read it.

16 THE DEPONENT: Okay. I'll read it and make

17 corrections if necessary and sign.

18 MR. LOMAN: And you can route that through

19 Mr. Hnasko.

20 MR. HNASKO: I'll send it to you when I get it, and

21 you can read it, and if there's any inaccuracies or whatever,

22 you can just change that.

23 MR. LOMAN: Okay. Thank you.

24 (Note: Deposition concluded at 11:22 a.m.)

25

1 BEFORE THE HEARING SUBCOMMITTEE

2 OF THE INTERIM LEGISLATIVE ETHICS COMMITTEE

3

4

5 In re: Representative Carl Trujillo,

6 Respondent.

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10

11 CERTIFICATE OF COMPLETION OF DEPOSITION

12 I, B. JULIAN SERNA, CCR, DO HEREBY CERTIFY that on

13 November 9, 2018, the deposition of DANIEL ABRAM was taken

14 before me at the request of, and sealed original thereof

15 retained by:

16 JACKSON, LOMAN, STANFORD & DOWNEY, P.C.

17 Suite 1500

18 201 Third Street, Northwest

19 Albuquerque, New Mexico 87102

20 BY: ERIC LOMAN

21

22

23 IFURTHER CERTIFY that copies of this certificate

24 have been mailed or delivered to all Counsel and parties not

25 represented by counsel appearing at the taking of the

deposition.

IFURTHER CERTIFY that examination of this

transcript and signature of the witness was required by the

witness and all parties present. On _____ a letter

was mailed or delivered to Mr. Hnasko regarding obtaining

signature of the witness. Corrections, if any, were appended

to the original and copies mailed to counsel and parties

1 I FURTHER CERTIFY that the recoverable cost of the
2 original and one copy of the deposition, including exhibits,
3 to ERIC LOMAN, is \$_____.

4 I FURTHER CERTIFY that I did administer the oath to
5 the witness herein prior to the taking of this deposition,
6 that I did thereafter report in stenographic shorthand the
7 questions and answers set forth herein, and the foregoing is
8 a true and correct transcript of the proceeding had upon the
9 taking of this deposition to the best of my ability.

10 I FURTHER CERTIFY that I am neither employed by nor
11 related to any of the parties or attorneys in this case and
12 that I have no interest in the final disposition of this case
13 in any Court.

14 B. JULIAN SERNA, CCR #206
15 Paul Baca Court Reporters
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1 DEPONENT SIGNATURE/CORRECTION PAGE

2 If there are any typographical errors to
3 your deposition, indicate them below.

4 PAGE LINE

5
6 _____ Change to _____
7 _____ Change to _____
8 _____ Change to _____
9

10 Any other changes to your deposition are to
11 be listed below with a statement as to the
12 reason for such change.

13 PAGE LINE CORRECTION REASON FOR CHANGE
14
15
16
17
18
19
20
21

22 I, _____ do hereby certify that I have read the
23 foregoing pages of my testimony as transcribed, and that the
24 same is a true and correct transcript of the testimony given
25 by me in this deposition, except for the changes made.