

1 OFFICE OF THE ATTORNEY GENERAL

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4 IN RE: STANKOSKI/STOUT EEO
COMPLAINT INVESTIGATION

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8 CONFIDENTIAL INTERVIEW OF

9 JAMES FORD

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11 Taken at the offices of
The State of Ohio
12 180 East Broad Street
11th Floor, Room A
13 Columbus, Ohio 43215

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on April 14, 2008, at 3:20 p.m.

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17 Reported by: Sara S. Clark, RPR/CRR/CCP/CBC

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1 PRESENT:

2 Ben Espy, Esq.
Executive Assistant Attorney General
3 Administration
30 E. Broad Street, 17th floor
4 Columbus, Ohio 43215

5

6 Julie M. Pfeiffer, Esq.
Assistant Attorney General
7 Employment Law
150 East Gay Street
8 Columbus, Ohio 43215

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10 --0--

11 MR. ESPY: James, I'm Ben Espy,
12 Executive Assistant Attorney General, and this
13 is Julie Pfeiffer. And she's a senior attorney
14 in the employment section.

15 You probably know why you're here.
16 We're investigating allegations of harassment by
17 Tony Gutierrez. We're trying to get information
18 surrounding the allegations, and your name came
19 up as a person who could help us out.

20 One thing we know is that the statements
21 are under oath and we cannot assure you
22 confidentiality in what you're telling us,
23 because some of these are considered public
24 records. But we hope that you will be as

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1 detailed as possible and with as much clarity as
2 possible so we can kind of sift through some of
3 these things we're trying to investigate.

4 Your giving this testimony does not
5 subject you to any type of retaliatory action or
6 any type of personal action which is demeaning
7 to you. We want to make sure you feel
8 comfortable with it, that you be forthcoming
9 with us and tell us everything you know. You're
10 willing to do that?

11 THE WITNESS: Sure, yes.

12 MR. ESPY: Raise your right hand and be
13 sworn in, please.

14 JAMES FORD

15 being first duly sworn, as hereinafter
16 certified, says as follows:

17 EXAMINATION

18 BY MR. ESPY:

19 Q. James, how long have you worked at the

20 Attorney General's office?

21 A. I believe it's five years now. A little

22 over.

23 Q. And you were hired under what Attorney

24 General?

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1 A. Jim Petro.

2 Q. And what capacity were you hired five
3 years ago?

4 A. Facility manager.

5 Q. Where do you presently work for the
6 Attorney General's office now?

7 A. Same thing, facility manager.

8 Q. Same title?

9 A. Uh-huh.

10 Q. What are your duties as facility
11 manager?

12 A. Jeez, pretty much everything. I am kind
13 of the go-between for the building, as far as
14 things breaking down, temperature, things like
15 that. Get people to come in, do a lot of
16 troubleshooting and stuff for the building. I
17 do the security badges for the 150 East Gay
18 Street, and I used to do the tower also, but

19 that's switched. I run the shredding program.

20 What else? Currently doing the school projects,

21 school digitalization project, working on that

22 right now. Just done little bit of everything.

23 Q. Jack of all trades?

24 A. That's right. Any kind of construction.

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1 Things need to be done outside the buildings,

2 I've done that.

3 Q. Okay. When did Tony Gutierrez become

4 your boss?

5 A. Let's see. It was, I think, a month or

6 so after the administration change.

7 Q. About February, March?

8 A. Yeah. Whatever his first day was when

9 he became my boss. We had the administration

10 change, we had -- who was it? He's out of

11 Washington, D.C. right now. We had him for,

12 like, a month as kind of the acting

13 manager/supervisor until Tony was hired. As

14 soon as he came in, he was my boss.

15 Q. Did you know Tony prior to his being

16 hired?

17 A. No.

18 Q. Okay. Did you know anything about his

19 background when he was hired?

20 A. Only that he was -- had come from

21 construction, had done -- I didn't know that he,

22 like, had owned a construction company, but he

23 had said he -- when he first came in that he had

24 a background in construction and stuff like

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1 that.

2 Q. Do you report to Tony directly or do you
3 report to --

4 A. I kind of report to Charlie Rosol and
5 Tony. There's only -- you know, there's not
6 very many of us in the section, so it's kind of
7 everyone answers, you know, to Tony, and then --
8 but most of it comes through Charlie. So I
9 guess my immediate boss would be Charlie --

10 Q. Okay.

11 A. -- and then Tony, but it's so small that
12 it's -- you know.

13 Q. You know Cindy Stankoski?

14 A. Uh-huh.

15 Q. How did you come to know her?

16 A. Just when she was hired.

17 Q. Do you know when that was?

18 A. No, I don't remember what day that was.

19 Q. How did you get to meet her or know her?

20 A. I sat right next to her.

21 Q. Your desk sits next to her?

22 A. Uh-huh.

23 Q. And you carried on conversation on a

24 regular basis?

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1 A. Uh-huh, yeah.

2 Q. Were you aware -- were you in a position
3 to hear any type of acts or statements which --
4 directed toward her which could be construed as
5 harassment by Tony Gutierrez?

6 A. Hmm. I can't think of anything like
7 right off. I just -- you know, there was a lot
8 of flirting going on.

9 Q. What type of flirting?

10 A. Just kind of -- oh, I don't know how to
11 put it. Just really nice and friendly to the
12 girls. He treated the girls in the section
13 differently than he treated the guys.

14 Q. So the flirting is coming from Tony, not
15 from Cindy, you're saying?

16 A. Right.

17 Q. Is that what you're saying?

18 A. Uh-huh.

19 Q. And --

20 A. Not that it wasn't reciprocated, not

21 that she didn't flirt back kind of. They were

22 both kind of flirty with each other, but, yeah.

23 Q. Did you ever hear him use any profanity

24 towards Cindy?

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1 A. Towards her? No.

2 Q. Okay. Did you ever hear any profanity

3 she used toward him?

4 A. No. No.

5 Q. Would you say that she was not subjected

6 to any type of acts from Tony which could be

7 considered harassment?

8 A. Acts of harassment? No, I wouldn't

9 think so.

10 Q. Did you ever receive any telephone calls

11 or text messages from her when she was out at

12 night drinking?

13 A. Not from her, no.

14 Q. Who did you get them from?

15 A. I had a -- received a text from

16 Mariellen Aranda.

17 Q. Where does Mariellen work? Where did

18 she work?

19 A. She did work in our section. And they
20 were both actually friends and were working
21 together under -- see, they kind of worked under
22 Pete Mash, telecommunications. So they both
23 worked under him. So I did one night receive a
24 text from Mariellen, saying that she was texting

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1 Cindy, but I didn't receive any from Cindy. It
2 was just from Mariellen.

3 Q. What -- do you know when this was?

4 A. I don't remember. I don't remember what
5 date.

6 Q. Do you know how long ago it was?

7 A. No. I mean, if I had to guess, I'd say
8 months ago. This was, I don't know, four or
9 five months ago.

10 Q. September maybe?

11 A. I can't remember. I don't really
12 remember what date it was.

13 Q. What was the thrust of the message you
14 received?

15 A. Well, the messages I got were that -- it
16 was kind of all through the night, you know,
17 Mariellen had texted me saying that Cindy's out
18 with Tony at a bar, they're drinking, and then I

19 got another text saying, you know, now she's
20 back at their apartment and drinking. And at
21 this point, I said, well, if she needs a ride or
22 something, you know, I texted her back that I'd
23 go get her if she needed a ride. Mariellen
24 lives in Lancaster. And at this point, I

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1 thought they lived somewhere near Grandview, and

2 I live in Upper Arlington, so I'm fairly close.

3 So I offered to -- if she wanted, to go pick her

4 up.

5 Q. What happened?

6 A. She said that she would let her know.

7 And I never heard anything back. Again, all

8 these texts were just from what Mariellen was

9 telling me.

10 Q. Why would Mariellen text you and ask you

11 to do this?

12 A. Both of us were pretty frustrated.

13 Q. About what?

14 A. About the way Tony was acting and

15 treating people. We felt -- Mariellen and

16 myself, we felt that, you know, he was treating

17 the girls, like Erika and Cindy and some -- a

18 little bit Amanda, although Amanda wasn't around

19 a lot, she was up in the booth, and Vanessa,
20 just kind of felt like a double standard. He
21 was real flirty with them, and -- this is in the
22 beginning -- flirty with them, and then would
23 give us all of the work, me, Cindy, Charlie,
24 Doug. Felt like he was real friendly to them,

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1 hey, how's it going, and then it was -- our
2 communication was, you know, have you got this
3 done yet, are you working on this, what are you
4 working on, why aren't you doing anything, that
5 type of -- just a real double standard type of
6 thing.

7 Q. Did you ever speak to him about that?

8 A. He and I did not get along in the
9 beginning. No. Our main issue was when the new
10 administration came in, I know some people
11 received a raise and I didn't. And I told him
12 that from the beginning, you know, that I was
13 bummed out that, you know, my work had tripled
14 and I hadn't received any kind of pay raise or
15 anything. And so we had issues about that that
16 we had talked, and he said, you know, he would
17 do something. And then it never came about and
18 stuff like that. And so when we did have our

19 meetings, it was more of -- I felt like he was
20 having me teach everyone how to do stuff, and
21 yet at the same time, he was not giving me any
22 credit for doing any work. He was constantly
23 saying I didn't do anything and stuff like that.
24 That really bothered me that he was telling me I

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1 wasn't doing anything and yet I was supposed to
2 teach everybody else how to do everything I was
3 doing, you know.

4 So I didn't like that. I kind of felt
5 like the only power or the chip I had to gain
6 was that I knew how to do a lot of stuff around
7 the office from what I had been doing. And I
8 felt like I was just loosing that power and not
9 seeing any kind of -- anything in exchange for
10 it.

11 Q. What did he say behind that?

12 A. Oh, just due to the fact that he wanted
13 to cross-train, you know, and that everyone
14 needed to learn how to do everything else like
15 that. It didn't really resolve anything. We
16 were still kind of at odds. The first thing he
17 did when he came in, we -- you know, when we
18 went down from, like, 12 employees to, like,

19 four, through the administration change, and,
20 like I said, myself, Mariellen, you know, Pete,
21 were picking up all the work. And the first
22 thing he did when he came in was he had -- he
23 took Erika and put her into this window office.
24 That was really the only kind of, I don't know,

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1 perk or anything. I wouldn't say the first
2 thing. It wasn't like, day one, but I'm saying
3 early on, first couple weeks in. And at the
4 time, Mariellen and I were upset already that,
5 you know, we kept getting worked assigned to us,
6 and her and some of the -- you know, Cindy, when
7 she came in, you know, weren't getting any extra
8 work. And that bothered us.

9 So, yes, when that night happened, you
10 know, it was kind of like, well, look -- now
11 look what's happening. Now they're going out
12 drinking together, you know, and who is going to
13 get -- come Monday, who will get more work? So
14 we kind of had that feeling back and forth. And
15 that's kind of what we had between us. So
16 that's what sparked it.

17 Q. Was that at the time considered out of
18 the ordinary, that he would take a coworker out

19 for drinks?

20 A. Yeah, it was out of the ordinary. I

21 mean, we were a close group, even with this

22 thing, you know. Even with this thing, like, we

23 were friends. I was still friends with Cindy,

24 still friends with Erika, even though I felt

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1 there was a double standard. And Mariellen
2 also, I believe, was friends with them, too,
3 even though we felt there was a double standard.
4 Because in my opinion, it's not really their
5 fault. I mean, they're not being assigned work,
6 you know. Who wants to go -- who wants to
7 double their workload?

8 So -- but we all kind of got along, and
9 so we would go out -- we had a couple happy
10 hours where the whole group would go out or
11 something. And I remember -- Tony had offered,
12 I think, me a couple times maybe to go out and
13 meet up or get a drink or something like that,
14 you know. I remember him -- I definitely
15 remember him saying, hey, I live out in Dublin,
16 you know, what kind -- what places are good
17 around there to go on out, get a drink, eat some
18 food, something like that.

19 So, no, he was pretty social with
20 everybody. But it was definitely strange when
21 she texted me the fact that this was just the
22 two of them going out, that type of thing. I
23 mean, if it would have been like a whole group,
24 I wouldn't have thought anything about it, but

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1 the idea that it was just the two of them was
2 kind of -- was strange.

3 Q. Was that the only time you were called
4 or texted involving Tony and Cindy?

5 A. Yes, I think so.

6 Q. What about Vanessa, ever texted or
7 called because of --

8 A. Because they were going out?

9 Q. -- her relationship with Tony?

10 A. No, I don't think so.

11 Q. Did you ever see Tony directing any
12 remarks toward Vanessa when she was there?

13 A. That I would think were, like,
14 inappropriate, or --

15 Q. Yes.

16 A. No. Again, it was flirty, but, you
17 know, she seemed flirty back, you know. So, I
18 mean, I guess the flirting was inappropriate,

19 but I wouldn't say there was one thing, you

20 know.

21 Q. What about profanity?

22 A. No, I didn't hear any profanity.

23 Q. Never heard Tony use profanity before?

24 A. Oh, yeah, I've heard -- yeah, he used

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1 profanity a lot of times, but not at somebody in
2 the office.

3 Q. What type of profanity would he use?

4 A. Oh, you know, gets off the phone with --

5 you know, having a bad meeting, this a-hole,

6 this jackass type of thing. That type of thing.

7 Jerks, you know, stuff like that. But not -- it

8 was never, hey, you a-hole, something like that.

9 It was always just in the way he was talking.

10 Q. Did you ever go drinking with Tony

11 yourself?

12 A. No, I don't think so.

13 Q. Do you drink?

14 A. I do. And I had planned on going out a

15 couple times but something else had happened or

16 something had come up, you know. It wasn't that

17 I wasn't going to do it, because I thought --

18 honestly, I felt like that would be a good way

19 for us to, you know, breach the problems that we
20 had, that maybe if we were away from a work
21 setting, you know, that he and I would get along
22 better.

23 Q. Were you surprised when Vanessa was
24 transferred?

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1 A. Yes, very surprised.

2 Q. Why did that surprise you?

3 A. It just came out of the blue. And

4 thought, you know, well, there had to have been

5 going something on. Something must have

6 happened. It was -- to be honest, I didn't

7 think she was that knowledgeable with computers,

8 so certainly the fact that she had been

9 transferred to IT was awful -- was really

10 strange.

11 Q. What did she do in IT anyway?

12 A. I have no idea what she does. I heard

13 she does, like, a lot of busy work, filing, that

14 type of stuff, clerical. But, yeah, I thought

15 that was -- just the fact that it was, like,

16 Friday, everything was normal, Monday, she was

17 gone and what was said to be, you know, like an

18 eight-week something or other, but that -- we

19 didn't believe that anyway.

20 Q. What reason were you given that she was

21 transferred?

22 A. There was something about an eight-week

23 trial period that she was going over there for

24 something. I didn't -- I didn't really pay

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1 attention, you know. It didn't really concern
2 me, so...

3 Q. Did you hear any other reasons why she
4 was being transferred?

5 A. I had heard that there was something
6 that she had sent a message -- and this is all
7 hearsay. I didn't hear from this from Tony,
8 Cindy, or -- I forget who I heard it from, but
9 it was from, like, a third source, office gossip
10 type of stuff, that she had sent a text message
11 and it had gone to Tony and Tony's wife, or sent
12 some kind of phone or text message or something
13 that had gone to Tony and his wife, and that --
14 you know, so Tony's wife found out, and somehow
15 that's why she had to switch out of sections.

16 Q. That was a rumor around the section,
17 that's why she was transferred?

18 A. Uh-huh.

19 Q. Was that rumor pretty prevalent in the
20 office? Do you think everybody would say they
21 heard the same thing maybe?

22 A. I would think so.

23 Q. Do you know who put that out?

24 A. I don't know. But, you know, honestly,

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1 I was curious to where if I heard someone
2 talking, I would have listened, but I'm not all
3 that gossipy to worry about, because I
4 understand how -- you know, unless you hear it
5 from the person, and even when you do hear it
6 from the person, things like this, you know --

7 Q. Yeah.

8 A. So honestly, I wasn't that interested in
9 paying attention to that stuff. That's just
10 what I heard and thought that was -- sounded
11 plausible. I knew they lived next door to each
12 other, you know, and hung out and stuff.

13 Q. Sounded plausible?

14 A. Yeah.

15 Q. Did you ever go out with Cindy?

16 A. Uh-huh.

17 Q. Where did you go out with Cindy?

18 A. Well, we had the happy hour one time,

19 went out to Club 185. I guess I've only been
20 out with her twice. No, no, no. I went to --
21 she was also a bartender at a bar up by where
22 she lives in -- shoot. Where was that? I went
23 to her bar and saw her, hung out with her there.
24 And then I -- I think another time I've gone out

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1 with her after work. So probably three times
2 outside of the office. And then we had meant to
3 meet up a couple other times and just never did.

4 Q. Is this -- when you met with her, was
5 Tony there at all?

6 A. No.

7 Q. Just the two of you?

8 A. No. First time was happy hour, so
9 everyone was there. Second time when we were at
10 her bar, it was -- I met -- Mariellen and I were
11 meeting -- myself and some friends of mine met
12 Mariellen at the bar and her friend. And then
13 the third time, it was me, Mariellen, and a
14 couple other people from work -- I'm sorry, me
15 and Cindy and a couple other people from work.

16 Q. Did Cindy ever share with you any
17 stories about she and Tony, problems she was
18 having?

19 A. No. The one night that we knew about
20 where they had gone back to the apartment -- or
21 Mariellen didn't want me to tell -- didn't want
22 me to know that she had told me -- Cindy --
23 Mariellen didn't want Cindy to know that she had
24 told, for whatever reason. I guess because

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1 Mariellen felt like she was confiding in her or
2 something like that. But that night, she texted
3 me, concerned about what she should do or
4 whatever.

5 Q. When you say she, who are you talking
6 about?

7 A. Mariellen was concerned about what to do
8 about Cindy texting her.

9 Q. What did you advise her to do?

10 A. That I would go get her, you know, if
11 she thought -- I knew they were far away, and if
12 she -- tell her if she feels uncomfortable or
13 whatever, I'd be happy to come get her.

14 Q. But you never received a call?

15 A. Huh-uh.

16 Q. Okay. Do you know if people in your
17 section -- people hired this past year, do you
18 know if they have a criminal record or not?

19 A. Oh, I don't know.

20 Q. No one's ever talked about it?

21 A. Huh-uh. Huh-uh.

22 Q. Have you got a raise this past year?

23 A. No. Although I was told again that I

24 was going to be up for a good one coming up,

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1 because Tony and I kind of got to a good place.
2 He had put me -- assigned me into this big
3 project. And Thursday before this happened, he
4 said I was going to -- that he had been talking
5 to people and in April, I was going to get a
6 good raise. But I don't see that happening now.
7 Something tells me it's not a top priority of
8 what's going on now. So I'm out of luck again.

9 Q. You've been there five years, so...

10 A. Uh-huh.

11 Q. Where is Mariellen now, is she on
12 disability leave?

13 A. Yeah. She is -- what's she doing? She
14 is working part-time, crime victims, I want to
15 say, or -- the new section in crime victims.

16 Q. CGI.

17 A. Yeah. I've heard -- I talked to her and
18 she said she works, like, partial days there.

19 Q. Is there anything at all, James, that
20 you can share with us that I haven't asked you
21 about that would shed light on this allegation
22 of sexual harassment in this section?

23 A. No. I mean, I hear rumor stuff, but --

24 Q. That you know firsthand?

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1 A. I don't know of anything firsthand. The
2 only thing I saw firsthand was the flirting
3 going back and forth and the kind of double
4 standard, you know. We had a little running
5 joke when he was hiring people, you know. We
6 would see people come in, and if an attractive
7 woman came in -- this would be something
8 Mariellen and I would joke about -- if an
9 attractive woman went in to interview, we would
10 say, well, she's got the job. So that kind of
11 stuff. But as far as, you know, once she was
12 working, you know, flirting, nice, but I would
13 never say once did I hear something that I would
14 say, like, well, that's really inappropriate or
15 seen something where he said, you know, oh, I'll
16 bet that puts her in an uncomfortable position.

17 Q. You don't think cursing in the workplace
18 makes people uncomfortable?

19 A. Cursing in general, maybe. I know
20 Christy is -- you know, the assistant, is, you
21 know, religious and doesn't use words like that
22 and stuff, but she seemed to be okay with it.
23 She seemed to be, you know, well, that stuff
24 happens, I don't do it, that kind of thing. So

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1 I wouldn't say that cursing -- I don't know. I
2 never heard anyone say anything to me about,
3 gee, it really bothers me when he curses like
4 that. I mean, some of his rants about his
5 wife --

6 Q. Was that in the office, too?

7 A. Yeah, that was in the office.

8 Q. What's he say about his wife?

9 A. That -- you know, just one of those
10 things where you could tell they were in a
11 fight. I can't think of anything specific.
12 But, oh, that jerk. Sometimes when he was
13 arguing with his wife on the phone, it was
14 pretty loud arguing, but he was just loud in
15 general. He did everything loud, you know.
16 When he was having fun and paying compliments,
17 it was just as loud as if he was fighting.

18 Q. But you heard him talking about his

19 wife, you yourself heard that?

20 A. Uh-huh, yeah. You could tell when he

21 was on the phone.

22 Q. He didn't close his door or anything?

23 A. Well, sometimes closes his door. Not

24 really -- I don't think he really made an effort

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APRIL 14, 2008

1 to close his door all that much, but even if he

2 did, it was -- we're all right next to each

3 other, so it's not like --

4 Q. Did you ever see him touch any female

5 inappropriately?

6 A. Never.

7 MR. ESPY: That's all I have.

8 MS. PFEIFFER: I have a couple.

9 EXAMINATION

10 BY MS. PFEIFFER:

11 Q. Did you ever hear him say or did he say

12 to you comments about any of the females' body?

13 She's got a nice rack, hey, look at her ass,

14 anything like that?

15 A. I don't think so. No, I don't think --

16 no, I don't think so.

17 Q. Did you ever hear him look at one of the

18 females in the office and if it they're eating

19 something, he would say, you know where that's

20 going to go, straight to your ass?

21 A. No. I remember on one occasion -- what

22 was it -- it was really early on. I think it

23 was with our intern, Lindsay Kates, used to be

24 our intern. She's down in Cincinnati now. And

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1 I remember -- I don't think she heard, but I
2 don't know, something about going to the -- to
3 her cube, back door to her cube or something
4 like that, making some kind of sexual reference
5 that was kind of like, oh, that -- but I don't
6 remember -- I don't think she heard it. And I
7 may have been the only one that heard it.

8 Q. What did you hear?

9 A. I can't remember word for word what he
10 said. I just remember saying something like --
11 making some kind of sexual reference that she
12 was going back to her cube to do something. It
13 was like, yeah, I'll bet you are, that type of
14 thing. But I can't remember word for word what
15 it was. I just know her -- I don't know. Never
16 really paid attention to it. I wasn't offended
17 by it, so -- you know.

18 I kind of took it -- honestly, what I

19 had told -- and this is what I told Mariellen.

20 Mariellen was upset with him in the beginning.

21 I said, well, you know, maybe it's just me that

22 I've grown up around coaches and locker room

23 talk, that just -- I know it didn't bother me.

24 I can understand how she thought it was

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1 inappropriate and, you know, I could see how a
2 female would think, you know, it was kind of
3 inappropriate and not necessary, but I never
4 really found it over the top type of thing, you
5 know.

6 MS. PFEIFFER: Okay.

7 FURTHER EXAMINATION

8 BY MR. ESPY:

9 Q. As facilities manager, James, are you in
10 charge of the cars also?

11 A. No, that's all Charlie.

12 Q. What do you mean, it's all Charlie?

13 A. He's in charge of doing all the cars and
14 stuff. I don't do anything with the cars.

15 Q. Okay. So he would be the person to talk
16 to if a car's been damaged or something like
17 that?

18 A. Yeah. I think he got all the calls and

19 stuff on that, yeah, if anything was done. He
20 would -- I'm sure he would be notified and then
21 he would probably have one of the office service
22 guys take it to the garage to get it fixed.
23 Q. Okay. Did you ever hear any allegation
24 regarding Tony driving a State car while

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1 drinking?

2 A. No, huh-uh.

3 MR. ESPY: Okay. I have nothing

4 further, James.

5 THE WITNESS: Okay.

6 MR. ESPY: Thank you for coming in.

7 Appreciate it.

8 THE WITNESS: Sure.

9 MR. ESPY: If you have any questions,

10 feel free to call me or Julie --

11 THE WITNESS: Okay.

12 MR. ESPY: -- over the next few days.

13 Thanks for coming by.

14 THE WITNESS: Okay. No problem.

15 --0--

16 Thereupon, the sworn interview of

17 Cindy Stankoski, April 14, 2008, was concluded

18 at 3:48 p.m.

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1 CERTIFICATE

2 STATE OF OHIO :
 SS:

3 COUNTY OF FRANKLIN :

4 I, Sara S. Clark, RPR/CRR/CCP/CBC, a
Notary Public in and for the State of Ohio, duly
5 commissioned and qualified, do hereby certify
that the within-named JAMES FORD was first duly
6 sworn to testify to the truth, the whole truth,
and nothing but the truth in the cause
7 aforesaid; that the testimony then given was
reduced to stenotypy in the presence of said
8 witness, afterwards transcribed; that the
foregoing is a true and correct transcript of
9 the testimony; that this interview was taken at
the time and place in the foregoing caption
10 specified.

11 I do further certify that I am not a
relative, employee or attorney of any of the
12 parties hereto; that I am not a relative or
employee of any attorney or counsel employed by
13 the parties hereto; that I am not financially
interested in the action; and further, I am not,
14 nor is the court reporting firm with which I am
affiliated, under contract as defined in Civil
15 Rule 28(D).

16 In witness whereof, I have hereunto
set my hand and affixed my seal of office at
17 Columbus, Ohio, on this day
of , 2008.

18

19

Sara S. Clark, RPR/CRR/CCR/CBC

20

Notary Public, State of Ohio.

21 My commission expires: March 10, 2013

22

23

24

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