

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 ERIKA HASKE

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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 18, 2008, at 4:00 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

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

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1 MR. ESPY: Ms. Haske, my name's Ben
2 Espy, I'm the executive assistant to the
3 Attorney General; and this is Julie Pfeiffer,
4 she's a senior attorney in the employment
5 section.

6 And we were appointed April the 8th to
7 investigate allegations of sexual harassment by
8 Anthony Gutierrez against two workers in the
9 general services section. Do you understand?

10 THE WITNESS: Uh-huh.

11 MR. ESPY: Your name's been given to us
12 as a person who could help us in this
13 investigation. And we're taking statements
14 under oath. And we cannot guarantee this will
15 be completely confidential, because it may be
16 public records involved in this case. Do you
17 understand?

18 THE WITNESS: Uh-huh.

19 MR. ESPY: Would you like to aid in this

20 investigation by helping us?

21 THE WITNESS: Sure.

22 MR. ESPY: If you would raise your right

23 hand and be sworn in.

24

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1 ERIKA HASKE

2 being first duly sworn, as hereinafter

3 certified, says as follows:

4 EXAMINATION

5 BY MS. PFEIFFER:

6 Q. Erika, what is your position with the

7 Attorney General?

8 A. Fixed asset manager. I am in charge of

9 all of our fixed assets.

10 Q. And are you part of the general services

11 division?

12 A. I am.

13 Q. How long have you been employed with the

14 Attorney General's office?

15 A. Since June of 2004. I was an intern,

16 and then in 2006 became full time.

17 Q. Okay. And have you -- so did you become

18 the fixed asset manager in 2006?

19 A. I did. In December of 2006.

20 Q. Okay. And who is your current

21 supervisor?

22 A. Charlie Rosol.

23 Q. Has he always been your supervisor?

24 A. Yeah, for the most part. When I started

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1 as an intern, it was John Conley. But then

2 recently, it's always been Charlie as my

3 immediate supervisor.

4 Q. Okay. Do you know Tony Gutierrez?

5 A. I do.

6 Q. We've asked you here today because

7 there's been some complaints made against Tony

8 by Cindy Stankoski and Vanessa Stout. You have

9 been identified as a witness to some of the

10 complaintive behavior. That's why we wanted to

11 ask you here, to see what you know, what you

12 don't know, that kind of stuff.

13 A. Absolutely.

14 Q. Do you know Cindy Stankoski?

15 A. Working relationship, yeah.

16 Q. Are you coworkers?

17 A. Uh-huh. I would say so. We don't

18 directly work together. But, I mean, we sit,

19 you know, a couple -- I sit around the corner

20 from her, so I'm not that far away.

21 Q. Okay. Have you ever socialized with her

22 outside of work?

23 A. We've had a few work happy hours where

24 she's been there, uh-huh.

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1 Q. Anywhere -- anytime where it's just you

2 and she?

3 A. We don't -- we don't have a personal

4 friendship or anything like that, so we don't

5 socialize outside of work together.

6 Q. Okay. Have you ever --

7 A. Besides that. I'm trying to think. We

8 had two work happy hours. She did sleep at my

9 house one time on my couch.

10 Q. Okay.

11 A. So I guess -- I guess that would be a

12 yes.

13 Q. How did that come about?

14 A. She was out, and she didn't have

15 anywhere to go, so she came home with us, me and

16 my roommate, and she slept on my couch, and we

17 took her to her car in the morning.

18 Q. Now, do you know Vanessa Stout?

19 A. I do, also through work.

20 Q. Through work?

21 A. Uh-huh.

22 Q. Have you ever socialized with her?

23 A. No. Actually, not at all, outside of

24 work, that is.

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1 Q. Part of their complaint is that Tony
2 Gutierrez continually asked them out for drinks.

3 A. Uh-huh.

4 Q. Things like that. Apparently he also
5 frequently asked you out for drinks; is that
6 true?

7 A. He asked me out a few times, but by no
8 means did it make me feel uncomfortable or
9 pressured. I'm not saying anything against
10 their allegations, but I didn't feel I was
11 threatened by his, I guess, offers, like it was
12 going to cost me my job or anything like that.
13 And -- I mean, I never went, ever.

14 Q. Okay. How did he -- how did this occur?

15 A. As -- can you explain that?

16 Q. Would he just come up to you at the end
17 of the day and say, hey, do you want to go?

18 A. Every now and then, he might just be

19 like, you know, we should grab some drinks, or

20 you should come over and have a drink or

21 something like that. But it was never -- it was

22 never pressured, I guess. It was just kind of

23 like, hey, we should go get drinks.

24 Q. And what did you -- you would always say

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1 no?

2 A. Oh, absolutely.

3 Q. Okay. You say "absolutely" as if never,

4 ever, ever.

5 A. No. I would never -- no.

6 Q. Okay. Because he's your boss, or --

7 A. For that reason, and he's married, and,

8 you know, many, many reasons. But those are the

9 main two.

10 Q. But you said you never felt threatened

11 to do it.

12 A. No. I never felt like my job was at

13 stake. I never felt that what he said was --

14 you know, I guess I'm the kind of person that it

15 goes in one ear and out the other. Because you

16 hear it every day, whether I'm at work or on the

17 street, you know, it's just another place to

18 hear it. Yeah, he's my boss, I know that's

19 inappropriate. But it didn't offend me, I

20 guess. It just kind of -- he said things and

21 they just didn't --

22 Q. Let's talk about that. Because one of

23 the complaints is that he makes inappropriate

24 sexual comments, I believe, to other people, and

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1 I believe to you, is what the allegations are.

2 A. Uh-huh.

3 Q. Can you describe for me anything that he
4 said to you that was offensive.

5 A. Not -- not to me personally. I know
6 there were times when he would say things, and I
7 would just be so shocked, I would be like,
8 Charlie, would you believe he said that to me?
9 He invited me over to his apartment, you know,
10 to go swimming, to go tanning or work out,
11 because they had a workout facility. Those
12 types of things. Maybe once or twice, those
13 keep -- types of things were mentioned.

14 Q. He invited you over to his apartment
15 once or twice?

16 A. Uh-huh.

17 Q. Did he invite you, say, we should go hot
18 tubbing?

19 A. He said, we should go swimming. I don't
20 think the words hot tubbing were used. It was
21 like, we have a pool, you should go swimming.
22 It's hard -- really hard because it's been the
23 last year, I guess, so it's hard to remember
24 exact comments that may have been made. And

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1 recently, he hasn't made any towards me. So,
2 you know -- but those were -- he did invite me
3 over, and he did ask me if I wanted to go
4 swimming or tanning or to the gym, things like
5 that.

6 Q. And you said no to those?

7 A. Absolutely.

8 Q. Okay. Did you ever hear him invite
9 Charlie or any of the guys over to his
10 apartment?

11 A. No. But I will add, I do sit in an
12 office that is four doors down from Tony's,
13 so -- and I've been in there since probably
14 June -- June or July. Over the summer I moved
15 in there. So, you know, I don't hear everything
16 that goes on out there. And I generally have
17 music on in my office. So I don't know how
18 reliable -- you know, if I did hear something, I

19 may have overheard something incorrectly. You

20 know what I mean? I don't know.

21 Q. Okay. Have you ever -- did Tony ever

22 tell you -- or have you ever heard of Tony

23 talking about any kind of Mafia connections that

24 he has?

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1 A. No.

2 Q. How about him talking about a gun that
3 he was carrying or gun that he keeps in his car?

4 A. He never specifically told me that. I
5 did hear from other people that he would have
6 one in his car from time to time. And I knew
7 that him and John Conley were planning on doing
8 a CCW class so they could carry. I know John
9 followed through with it. I do not believe Tony
10 did. But I knew that.

11 Q. Did he give you any reason as to why it
12 would be that he needed to carry a gun?

13 A. No.

14 Q. Did -- just your perception in the
15 office environment, was there an environment
16 where people were afraid of Tony?

17 A. No. I -- I don't know where that came
18 from, really. I -- Tony can be intimidating,

19 you know. Tony is very forceful. When he wants
20 something done, he wants it done. But I
21 wouldn't say that anybody was personally afraid
22 of Tony. I mean, maybe to the fact they wanna
23 get their job done because, you know, he's going
24 to be on them about it. But I can't imagine

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1 being personally afraid of him.

2 Q. He never made you afraid of him?

3 A. Absolutely not.

4 Q. Did you hear any kind of profanity or

5 anything coming from his office or from him?

6 A. There was one time I may have heard him

7 yelling. I don't know exact words that were

8 coming out of his mouth, but I know he was

9 yelling. And he was in his office, and I was in

10 mine, so that's kind of far down the way for me

11 to be hearing him. So, yeah, there were -- I'm

12 sure more than one instance. I'm not always in

13 the office either, because I travel from time to

14 time, so...

15 Q. Okay. Have you ever heard him refer to

16 his wife or other women as bitches?

17 A. No.

18 Q. Okay. Have you ever heard him use the

19 word cunt?

20 A. Huh-uh.

21 Q. Have you ever had any conversations with

22 Cindy Stankoski about any problems that she was

23 having in the office with Tony?

24 A. We've talked from time to time. Not

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1 really anything serious. She doesn't really
2 talk about those things with me. Which is why I
3 was surprised, because, you know, Cindy goes out
4 and likes to have a good time, we all know that.
5 And I didn't -- I thought they were just friends
6 outside of work. I knew that there was -- I
7 knew of the instance, through gossip or
8 hearsay -- you know, people talk, but I didn't
9 know the extreme nature of, I guess, the
10 incident.

11 Q. Was it your perception -- let me ask you
12 this: Did you see them being friendly with each
13 other in the office?

14 A. What do you mean by friendly? Just,
15 like --

16 Q. Would they joke together?

17 A. Yeah. I mean, they smoked together, you
18 know. She did -- she organized the birthday

19 parties for him and Charlie and Pete and all
20 those guys. And her and Vanessa would have
21 lunch in Tony's office. I mean, I didn't see an
22 issue between them at all, until -- until
23 Vanessa got moved to IT, then I started seeing
24 the distance, and I started seeing her not want

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1 to make eye contact with him and things like
2 that. But I don't know what happened in that
3 matter of time.

4 Q. How many times did you -- approximately
5 how many times have you seen Cindy and/or
6 Vanessa have lunch with Tony in his office?

7 A. Oh, probably just once or twice. I
8 mean, they frequently took smoke breaks with
9 Tony, so...

10 Q. The three of them together?

11 A. Sometimes. Sometimes it would be Tony
12 and Vanessa; sometimes it would be Vanessa and
13 Cindy; sometimes it would be Cindy and Tony.

14 Q. Okay. Do you -- would you ever see, you
15 know, if Cindy would want to go have a smoke
16 break, would she go find Tony?

17 A. I don't know. I'm usually in my office.
18 Ever since Cindy started, I've been in an

19 office. So as far as that goes, I usually don't

20 see what's going on.

21 Q. Now, I think you mentioned that you're

22 aware of the incident. An incident occurred on

23 September 10th where it's been established that

24 Cindy and Tony went out for drinks --

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1 A. Uh-huh.

2 Q. -- and she went back to his apartment
3 with him. Is that the incident you were talking
4 about?

5 A. Yes, that's the one I was referring to.

6 Q. And I don't know -- since the
7 investigation started, there's been a lot of
8 media.

9 A. Uh-huh.

10 Q. And in that media coverage, it's been
11 alleged that Cindy woke up the next morning with
12 three buttons unbuttoned, I believe.

13 A. Uh-huh.

14 Q. Prior to perhaps learning about it in
15 the papers, did you ever hear Cindy or anybody
16 else make that allegation?

17 A. Absolutely not. I knew that they had
18 gone out for drinks and she had -- I mean, when

19 I say I know, it's all from what I've heard from
20 other people, not directly from Cindy, and not
21 directly from Tony. But what I heard was that
22 she had gone out for drinks to a couple
23 different places, and to a restaurant, and then
24 went back to their apartment, and then that was

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1 the end of what I knew.

2 Q. Okay. Did you ever talk to Mariellen

3 Aranda?

4 A. I -- we worked together very closely.

5 Q. Did she tell you about this incident?

6 A. She did mention that Cindy had sent her

7 text messages throughout the evening. She was

8 concerned about Cindy. She had told me that.

9 Q. Concerned for her physical safety?

10 A. No, I think she was more concerned

11 like -- Mariellen didn't really get along very

12 well with Tony, and I think she was more

13 concerned because she didn't want Cindy outside

14 of work with Tony, and it made her --

15 uncomfortable feeling.

16 Q. Okay.

17 A. I mean, that's just my perception.

18 Q. Did Cindy ever text message you?

- 19 A. The only text messages I get from Cindy
20 are typically in the morning, when she's running
21 late, she'll tell me she's running late. But I
22 get those -- I mean, I get a lot of those.
23 That's about it.
- 24 Q. So she runs late a lot?

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1 A. Yes, she does.

2 Q. Okay. Why does she text you about it?

3 A. I'm the first one in the office usually

4 in our department. I get in between 6:00 and

5 6:30, on average. And, you know, since Charlie

6 doesn't come in until 7:30, and when Tony's

7 here, it's hard to say what time exactly he

8 comes in, so she usually just lets me know, and

9 I kind of pass the word along. And that way we

10 make sure we have phone coverage and those sorts

11 of things.

12 Q. Now, allegedly -- or I think it's -- it

13 has been established at this point -- I don't

14 want to lead you -- but apparently Vanessa sent

15 a text message -- and Vanessa sends joke text

16 messages a lot.

17 A. Oh, yeah.

18 Q. Do you get those?

19 A. Not from Vanessa. I've got a couple
20 from Cindy throughout the time she's been there.

21 Q. What do they entail? What are they --

22 A. Oh, they're usually just either big mass
23 text messages that could be dirty in nature, or
24 of sexual nature, or things like that, or they

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1 could be just friendly big mass e-mails, like --
2 I'm trying to think of something, but I can't
3 even think of any. The chain e-mails you might
4 get through your personal e-mail or something
5 like that, she'll send through text.

6 Q. Allegedly, Vanessa sent a text message
7 to Tony Gutierrez, whose wife found out about
8 it.

9 A. (Witness nods head.)

10 Q. Did you hear anything about that?

11 A. I did hear that that incident had
12 occurred.

13 Q. Okay. Who did you hear that from?

14 A. Through the office. Just office gossip.

15 Q. Did you ever talk to Tony about it?

16 A. I did not.

17 Q. And Vanessa was transferred right around
18 January 18th of 2008. Did you ever obtain a

19 reason -- did Tony ever give a reason for why

20 she was transferred?

21 A. No. And I personally assumed it was

22 because of the message that his wife had seen.

23 Q. Why did you assume that?

24 A. Because I had found out about that right

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1 when -- right before she got transferred. And I
2 know that Tony's wife and Marc's wife are best
3 friends, and I know their relationship, so I
4 just kind of assumed.

5 Q. How do you know that they're best
6 friends?

7 A. Common knowledge, I guess.

8 Q. Okay.

9 A. I mean, Tony said before that his wife
10 and Marc's wife are really close. And I
11 actually -- last -- when Marc came into office,
12 I baby-sat for the -- what was it -- not the
13 inaugural ball, but some kind of ball they
14 had -- the governor's ball, and I baby-sat the
15 kids -- I oversaw the baby-sitting for all the
16 kids. So I saw Marc and his wife and Tony and
17 his wife before Tony ever even started with our
18 office, they were there together.

19 Q. You oversaw the baby-sitting for the
20 governor's ball?

21 A. Uh-huh. For the Attorney General's
22 employees.

23 Q. Okay. How did you go about --

24 A. Someone asked me to do it, and I said --

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1 I think it was Beverly. Or someone on the 17th
2 floor asked me if I could watch over the
3 baby-sitting of the ball, and I said, sure, why
4 not.

5 Q. Okay. Do you know Beverly Staten?

6 A. I do know Beverly.

7 Q. Prior to --

8 A. No. I mean, besides -- ever since she
9 started. I didn't know her before she came into
10 office -- into the office.

11 Q. Have you ever been to Tony's apartment
12 in Dublin?

13 A. Picking up vehicles. During the day
14 sometimes we would have to go out there and drop
15 off and pick up Impalas, or cars. And when
16 interns weren't available, I was asked to do it.

17 Q. Why would the cars be at the Dublin
18 apartment?

19 A. I don't know. I don't know exact
20 reasons. Charlie could answer that. I just
21 know there was a couple times that we went out
22 and picked up Impalas, and one time picked up
23 Marc's Suburban. I think the keys had been
24 locked in it, or somehow, something happened to

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1 the keys, and Marc didn't have the keys.

2 Q. Have you ever been inside the apartment?

3 A. The day we picked up the Suburban, I

4 went in the front door, and that was as far as I

5 went. I waited, and we left. I was with Tony

6 that day.

7 Q. You were with Tony?

8 A. Uh-huh. He had to get stuff out of the

9 apartment. So as far as I got was maybe a foot

10 in the door.

11 Q. Okay.

12 A. I would never -- I mean, I didn't even

13 want to go that far, so it was just --

14 Q. Okay. Did he say, come on in?

15 A. No, he's just like, I got to grab

16 something, you can wait right here; I said,

17 okay, and we took off, and that was that.

18 Q. Didn't offer you anything to drink?

19 A. Nope. I think by that point, I think he

20 knew -- he knew. He kind of gave up after a

21 while, it seemed like.

22 Q. Okay. Do you think at some point he

23 tried to see how far he could go with you?

24 A. I -- I think he knew all along it was

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1 kind of a dead-end road. But just mentioning
2 drinks here and there was pretty much all he
3 did. I mean -- and like I said, it never really
4 made me feel threatened or pressured. I never
5 felt like, oh, well, if I don't give Tony the
6 time of day, he's going to fire me, because I
7 knew he respected me as an employee. He knew I
8 did my job well.

9 Q. How do you know that?

10 A. He would tell me that he knew, you know,
11 I did my job really well. And one day he came
12 in, and he just said, you know, he respects the
13 fact that I come in, I work from 6:00 in the
14 morning until the time I'm done at the end of
15 the day, and I get my job done.

16 Q. Okay. From your perspective, do you
17 believe that the employees in general services
18 felt that Tony might have been kind of

19 untouchable?

20 A. Sure.

21 Q. Why did you think that?

22 A. Because of his close relationship with

23 Marc. I mean, they live together. Everyone

24 knew they were long-time best friends.

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1 Q. How did you know they were long-time
2 best friends, did Tony say that?

3 A. You know, I don't remember how that came
4 up, if someone had mentioned it or Tony had
5 mentioned it. But from the get-go, you know, we
6 knew they lived together, we knew they were both
7 from Youngstown. I'm pretty sure Tony probably
8 did mention it. But I wouldn't say I'm a
9 hundred percent sure it came directly from Tony,
10 but I'm pretty sure it probably did.

11 Q. That they were friends from Youngstown?

12 A. Oh, yeah, for a long time. Along the
13 line -- I'm absolutely positive Tony mentioned
14 that they had been long-time friends and
15 neighbors.

16 Q. Okay. Did he ever say, you know,
17 whatever I want, I can get it done, anything
18 like that?

19 A. No. But it was kind of understood that
20 when Tony wanted to get something done, Tony got
21 something done. Just kind of an understood
22 thing. It seemed like whenever Tony needed
23 something, it got done. But he -- I don't think
24 he ever came -- at least not to me, I don't know

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1 to whom else -- but he never came out and said
2 to me, well, if I want something, I'm gonna get
3 it or anything like that.

4 Q. But it just seemed like that's what
5 happened?

6 A. It seemed like that was the case.

7 Q. Do you know anything about whether or
8 not his office was soundproofed?

9 A. I know nothing about that.

10 Q. Okay. Did you know anything about
11 whether or not he had his cars outfitted with
12 lights and sirens?

13 A. I do believe he did. I've driven the
14 vehicles. I'm not sure about the last vehicle,
15 but the Suburbans both had lights and sirens in
16 them.

17 Q. Did he have them put in?

18 A. You know, I'm not a hundred percent

19 sure. At least with the second -- well, I don't
20 know, because I think that the red Suburban
21 belonged to OCIC -- they both belonged to OCIC
22 first, so I'm not sure if he had them put in or
23 not.
24 Q. Okay.

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1 A. I do not know. It's a possibility.

2 Q. Were you present right around Christmas

3 Eve when Marc Dann and his wife walked around

4 and gave everybody mugs with candy in them?

5 A. I was in the office that day, yes.

6 Q. There's been some allegations that

7 perhaps Cindy Stankoski was somehow snubbed or

8 something like that in the give-out. Did you

9 see --

10 A. I did not see. I heard. She talked

11 about it. I mean, I heard through the grapevine

12 that that had happened, but I was not a witness

13 to that.

14 Q. Did you ever talk to Charlie Rosol or

15 did he discuss with you any issues that Cindy or

16 Vanessa were having in the workplace?

17 A. I talked to Charlie on a regular basis

18 about things, my -- like, if I have issues with

19 anything, I usually go to Charlie. But he was
20 kind of -- it was one of those things where he
21 didn't really want to talk about things like
22 that. I know it's a personal matter. I knew
23 there were issues. And if I came to him with a
24 question, he usually told me, you know, you need

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1 to go to HR, you need to do this, you need to do
2 that. But we didn't have any serious talks
3 about Cindy or Vanessa or their allegations,
4 things like that.

5 MS. PFEIFFER: I don't think I have
6 anything else.

7 EXAMINATION

8 BY MR. ESPY:

9 Q. Your title denotes fixed asset manager?

10 A. That is correct.

11 Q. What is a fixed asset manager?

12 A. Pretty much whenever we get a new asset
13 into our office, be it a piece of computer
14 equipment or lab equipment, I tag it, I put it
15 in our inventory system, I monitor that
16 equipment, I report it every year to DAS and
17 OBM; and then when we're ready to salvage it, I
18 do the salvage process.

19 Q. So every piece of office furniture, you

20 have a little tag on it?

21 A. Pretty -- well, it depends what it is

22 and how much it costs. Anything over \$500 that

23 is computer equipment, and anything that is over

24 a thousand dollars that is lab equipment or

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1 furniture.

2 Q. And you keep track of it?

3 A. Uh-huh, I do. I have a -- we have a
4 fixed asset system called Oracle that we use,
5 and we keep track of all those things that we
6 have to report on every year.

7 Q. What about vehicles?

8 A. I do not do the vehicle reports on a
9 monthly basis. Once a year, I do OCIC vehicle
10 reporting to one of our departments. But I
11 don't keep personal track of the vehicles and
12 things of that nature.

13 Q. You don't keep track of repairs?

14 A. No, I do not.

15 Q. You also indicated that you come to work
16 around 6:00 in the morning.

17 A. Between 6:00 and 6:30, generally.

18 Q. On the evening -- on the morning of

19 September 11th, Tony came in early that morning.

20 A. (Witness nods head.)

21 Q. Did you see him come in around 6:30?

22 A. It's possible. I do not recall exactly.

23 I know there were some days he did come in

24 early. Not very often. So that probably was

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1 one of the days that I remember him coming in

2 early.

3 Q. What time did he normally come in?

4 A. I'd say 6:15. I used to come in --

5 Q. Not you. What time does he normally

6 come in?

7 A. Oh, Tony?

8 Q. Yes.

9 A. It's really hard to say. Sometimes it's

10 8:00, 8:30.

11 Q. On this particular morning he came in

12 and he looked in Cindy's desk and went right

13 back out again.

14 A. I do not recall that.

15 Q. You don't recall that?

16 A. No, I do not.

17 Q. Okay. What time do you get to work?

18 A. Between 6:00 and 6:30 usually.

19 Q. Do you live in Columbus?

20 A. I do. At that point in time, I was

21 probably living in Dublin. I now live in

22 Columbus, the northern end of Columbus.

23 Q. You were commuting from Dublin and got

24 there at 6:00 in the morning?

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1 A. Uh-huh. I usually left about 20 'til

2 6:00.

3 Q. And what time do you get off?

4 A. 4:00. I just like to get in early and

5 get organized and things of that nature

6 before -- I go up at 7:00 to the 17th floor and

7 open Marc's office so that the cleaning crew can

8 go in every day.

9 Q. Okay. You started your testimony out by

10 talking about Cindy Stankoski going out with you

11 and sleeping on your couch.

12 A. Uh-huh.

13 Q. Tell me about those circumstances. What

14 happened?

15 A. That particular evening, I was out with

16 some of my friends at a bar here in the Arena

17 District, and we ran into her. She was out, as

18 well. And I don't know if she lost the people

19 she was with or what happened exactly. But then

20 she ended up getting a ride home with us, and

21 she slept on our couch, and in the morning, I

22 took her to her car and she left.

23 Q. But you said she had nowhere to go.

24 That's what you --

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1 A. Well, I'm assuming she just lost the
2 people she was with. I don't know what exactly
3 the circumstances were.

4 Q. Where was her car?

5 A. It was parked downtown. But she was
6 intoxicated, so there was no way she was gonna
7 drive.

8 Q. So she slept it off at your apartment?

9 A. Correct.

10 Q. Have you -- does she have a reputation
11 for drinking a lot?

12 A. She does.

13 Q. You've been out with her drinking, you
14 said, two or three times?

15 A. Uh-huh. We've been to two office happy
16 hours together, and then that event that I had
17 spoken about.

18 Q. Can you describe her as a person who can

19 hold her liquor or who can't hold her liquor?

20 A. I mean, she drinks a lot. And I think

21 anybody drinks enough, they're not going to be

22 able to hold their liquor.

23 Q. Do you remember what she drank when she

24 was out with you?

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1 A. Goose on the rocks.

2 Q. Didn't deviate too much from that?

3 A. No.

4 Q. You also said that you didn't know about

5 the extreme nature of the incident until later.

6 A. Right.

7 Q. What part about the incident do you call

8 extreme?

9 A. Well, I didn't know that she had --

10 actually, I didn't know the reasoning she had

11 gone back to Marc and Tony's apartment, for

12 pizza. I did not know that part. I also did

13 not know that she laid in Tony's bed, or that

14 she woke up next to Tony, or that her pants were

15 unbuttoned.

16 Q. Okay.

17 A. I did know -- pretty much all I knew was

18 that she had gone out to a couple bars for

19 drinks, gone to a restaurant and then gone back

20 to the condo.

21 Q. Who was Cindy's closest friend in

22 general services?

23 A. Vanessa, when she started.

24 Q. Prior to Vanessa's arrival?

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1 A. I don't know that she had any close
2 friends in our section. She talked to
3 Mariellen, when Mariellen was still there, a
4 little bit. But I don't think they ever got
5 very close. I know they didn't hang out on
6 their own time, if at all.

7 Q. Was she close to any of the guys in
8 terms of being friendly? Did she talk to a lot
9 before Vanessa arrived?

10 A. No, not really. Because her and James
11 Ford had gotten into a verbal disagreement, and
12 she had gotten into a verbal disagreement with
13 Andy Miller after -- I think that was after
14 Vanessa arrived, with Andy. But, no, not
15 particularly close at all.

16 Q. How what about --

17 A. Maybe Doug.

18 Q. Doug Armbrust?

19 A. Uh-huh. She did talk to Doug a lot. I

20 mean, she still has -- I believe they're

21 friends.

22 Q. Were they close before Vanessa arrived?

23 A. I'm trying to -- you know, I think --

24 she would go in and sit in his office and talk

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1 to him and go to lunch with him, things like

2 that. But I believe -- it's before Vanessa

3 arrived. It kind of all goes together.

4 Q. After Vanessa, everything changed?

5 A. Yeah.

6 Q. You're a single person?

7 A. I'm not married, correct.

8 Q. Most of the ladies in that section, are

9 most of them single?

10 A. Uh-huh.

11 Q. Okay. Is there anyone in the section

12 that's married?

13 A. As far as women go?

14 Q. As far as women.

15 A. Hmm. Nancy Dunn in office services,

16 which is part of our section, but she doesn't

17 sit by any of us. She's been around for a

18 while.

19 So, no, any of us that are found in that
20 section of general services, we're all single,
21 unmarried.

22 Q. Including Kristy August?

23 A. Correct.

24 Q. Is there anything else you would like to

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1 tell us that we forgot or should ask you about?

2 A. I'm trying to think of anything. I

3 don't know at this point in time.

4 Q. Well, think about it; and if you do

5 think there's something you want to add to it,

6 you can contact us both, we're in the office

7 directory e-mail-wise, and let us know.

8 A. Absolutely.

9 Q. We know we're keeping you past your

10 appointed time. We apologize for that. We

11 appreciate you coming in.

12 A. That's no problem. I actually wanted to

13 take care of it today, before the weekend.

14 Q. Okay. Thank you very much.

15 --0--

16 Thereupon, the sworn interview of

17 Erika Haske, April 18, 2008, was concluded at

18 4:30 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 ERIKA HASKE 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/CCP/CBC

20

Notary Public, State of Ohio.

21 My commission expires: March 10, 2013

22

23

24

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