

ALASKA LEGISLATURE COMMITTEE FILES 1985-1986 80/2

3632 HSTA CAMPAIGN FINANCING (FILE 2)

508

1 THE WITNESS: I don't know.

2 MR. PESTINGER: Is this your only copy?

3 THE WITNESS: Yes, right now.

4 MR. PESTINGER: We would want to leave with a
5 copy of this check. You can use your copy machine here.

6 MR. DUNNAGAN: Off record.

7 (Short break taken)

8 (Exhibit 5 marked
9 for identification.)

10 BY MR. DUNNAGAN:

11 Q. Ms. Clossey, with regard to Exhibit Number 5,
12 you've submitted this to me as proof that you paid Bill
13 McConkey \$1,920 for his services; is that correct?

14 A. That is correct.

15 Q. What is this thing?

16 A. It's a draft from my checkbook.

17 Q. Do you have a canceled check?

18 A. No, I bank at the Alaska Federal, or credit
19 union. U.S.A. Credit Union.

20 Q. How does this thing work?

21 A. You write a check and they have a carbon copy
22 behind it. They don't mail you out canceled checks.

23 Q. Your check was to Joe Norris?

24 A. That is correct.

25 Q. It says "loan payment" at the bottom. What

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Does that mean [REDACTED]

A. [REDACTED] correct. Because Joe loaned me the [REDACTED] \$2,000 for this, upon my request.

Q. Where did he get the money?

A. I don't know that. I assume from his account.

Q. Have you paid him back?

A. Not as yet. The money was deposited into my checking account to be held there; I just didn't want the cash laying around the house. I asked Joe to withdraw it. I made the check out to him, gave him a deposit for the withdrawal, and he made the withdrawal and went and paid McConkey personally, just dropped it off.

Q. Even though this says "loan payment" on it, it's your understanding that it went to McConkey?

A. I know that it did.

Q. You still owe Joe the \$2,000?

A. Yes and no.

Q. How much "yes" and how much "no"?

A. We share funds.

Q. Do you think that perhaps he really won't press you for payment?

A. I doubt it.

Q. Really you regard this, then, as a gift?

A. I can't know how I regard it.

1 Q. [REDACTED] g?

2 MR. PESTINGER: [REDACTED] legal

3 [REDACTED]

4 THE WITNESS: I choose not to answer that.

5 He simply had the money available. "If you want to do it,

6 Sarah, here's the money. Take it out of our account."

7 BY MR. DUNNAGAN:

8 Q. Out of his account, and he put it in your
9 account. And then you took it back, gave it to him and he
10 paid McConkey?

11 A. He gave me the cash; I didn't want it around
12 the house.

13 Q. He gave you actual cash?

14 A. Yes, he did.

15 Q. So as far as you know, there would be no
16 papers back to him?

17 A. No. Other than simply he was a liaison to go
18 and pay McConkey.

19 Q. How long did it take McConkey to come up with
20 the rough draft?

21 A. Probably the better part of a week.

22 Q. Was it after he was paid?

23 A. No.

24 Q. Explain to me the sequence of events.

25 A. I didn't pay him until after everything was

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[REDACTED] made co [REDACTED] h
[REDACTED] the fee would be [REDACTED] e,
[REDACTED] printing would cost, et cetera, et cetera.

Q. [REDACTED] did he ever give you a break-out or did he just give you a flat --

A. He gave me a flat fee./

Q. And you still don't know what the printing costs were then?/

A. I paid him to do it. I don't know how much of that fee was charged to me as a consultant. I don't know how much of that fee was charged to me as basic cost to distribute the information I wanted distributed.

Q. When did the mailing go out?

A. Pardon?/

Q. The mailing went out in early November; is that your recollection?/

A. The mailing went out on Thursday or Friday, before November 6th.

Q. Late October, early November?/

A. Early November, yes. /

Q. At this time you knew that you had also given notice at your job; is that correct?

A. That is correct.

Q. And you had no other prospects for [REDACTED] is that correct?/

DEPOSITION OF SARAH A. CLOSSEY

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A. ~~Q. Did you think that establishing your own consulting business would be difficult?~~
~~no.~~

Q. ~~Did you think that establishing your own consulting business would be difficult?~~

A. ~~Yes.~~

Q. Did you think there might be some financial hardship involved?

A. Yes.

Q. Was Joe working at the time?

A. I don't remember.

Q. Is he working now?

A. Yes.

Q. In what way, what's his job?

A. ~~I care not to disclose that. I can't.~~

Q. ~~Is he working for the Alaska State Troopers?~~

MR. PESTINGER: Well, why don't you direct the question to Joe.

THE WITNESS: Can you ask him, please. If he chooses to answer that, fine. I choose not to, for safety reasons, okay?

MR. PESTINGER: Oh, yes.

MR. DUNNAGAN: Let's go off record.

(Off-record discussion)

MR. DUNNAGAN: We just discussed the nature of Joe's job. I have agreed not to ask as to the nature

1 of the job.

2 Q. Will you tell me when he began this new job,
3 to the best of your knowledge?

4 A. I don't know that.

5 Q. Was he doing this in November of '84?

6 A. I do not know that.

7 Q. How well do you know Joe?

8 A. I just don't remember the dates.

9 Q. Do you remember, say, to a season, if not to
10 a month?

11 A. Probably a certain percent of 1984, worked
12 for the federal government for the same purpose. When he
13 made the transaction from the federal to the state, I
14 don't know.

15 Q. Was he unemployed at any time during the fall
16 of 1984?

17 A. Yes.

18 Q. Do you remember roughly the dates?

19 A. No, I do not.

20 Q. Was he unemployed for less than a month?

21 A. I really don't know.

22 Q. We're talking about the man that you live
23 with, the man you commend your money with, the man who is
24 your fiance. You have given notice of terminating your
25 own job, you've borrowed \$2,000, and you don't know if he

DEPOSITION OF SARAH A. CLOSSEY

1 had a job?

2 A. I know he had an income.

3 Q. Well, let's pursue that. How steady was his
4 income?

5 A. It didn't come on the 1st and the 15th.

6 Q. Do you know how much a month he expected to
7 get?

8 A. No, I don't.

9 Q. Do you know how often he got paid?

10 A. I really do not.

11 Q. Was his source of funds federal or state
12 government?

13 A. That I do not know either. I choose not to
14 know for my own sake. I paid the rent in October. My
15 residence is in my name. I am not living in his
16 residence, he is living in mine. The telephone is in my
17 name. The entire responsibility for that premises is
18 mine.

19 Q. How did you expect to pay the rent after you
20 quit your job?

21 A. I had enough to pay the rent.

22 Q. For how long?

23 A. Till December.

24 Q. December is gone. How have you been paying
25 the rent?

DEPOSITION OF SARAH A. CLOSSEY

1 A. Joe paid it in January, a part of it.

2 Q. Did you have a large amount saved up in
3 October?

4 A. I had some cash, yes.

5 Q. How much?

6 A. Not a really large amount.

7 Q. Can you give me some idea?

8 A. Enough to meet my bills, in November and
9 December.

10 Q. Surely that would crystalize in your mind as
11 being some amount of money.

12 A. I probably have 2,500.

13 Q. When you quit your job in October? When you
14 quit your job in October, you had about 2,500; is that
15 correct?

16 A. Yes.

17 Q. You chose not to know whether your
18 fiancee/roommate had a job; is that correct?

19 MR. PESTINGER: Well, counsel, we discussed
20 the nature of the legitimate and important employment off
21 the record and there are some policy and safety reasons
22 why we can't make --

23 MR. DUNNAGAN: I'm going to put it on the
24 record unless I get some more conclusive answers or some
25 more direct answers to a very simple question.

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1 MR. PESTINGER: What is your simple question?

2 MR. DUNNAGAN: When was he employed and when
3 wasn't he employed?

4 THE WITNESS: Why don't you ask Joe that.
5 You're going to depose him later.

6 BY MR. DUNNAGAN:

7 Q. I want to know what you know. It really
8 isn't important what the facts are, I want to know what
9 you thought the facts were. I'll end up knowing what the
10 facts were. I'm interested in what you knew, or you were
11 told.

12 MR. PESTINGER: When was he employed during
13 what period of time?

14 MR. DUNNAGAN: That's what I would like to
15 know.

16 Q. Fall of '84?

17 A. I think he worked on a consulting basis
18 partially during 1984 which gave him additional income.

19 Q. Do you know who he worked for?

20 A. I know in 1984 he worked for the federal
21 government. I think it was late fall that he began
22 working for the state.

23 Q. Do you know for whom he was a consultant?

24 A. Did consulting work for a Japanese firm to
25 establish a fishing business. Did some oil consulting.

1 He also had other investments that gave him income.

2 Q. Like what?

3 A. He receives some money from an Iliamna Lake
4 Lodge partnership.

5 Q. Did he ever do any consulting work for Ed
6 Dankworth?

7 A. He said that he had in prior years.

8 Q. Did he receive any money from Ed Dankworth in
9 the fall of '84?

10 A. Not that I'm aware of.

11 Q. Do you know who actually printed up this
12 flier?

13 A. Who the printer was?

14 Q. Yes.

15 A. No, I do not.

16 Q. The postage cost 80 bucks?

17 A. Yes.

18 Q. Who paid for the labels?

19 A. I did. I don't remember exactly. I remember
20 where we went and got them. I picked them up.

21 Q. Where did you pick them up?

22 A. At a computer service in Mountain View, on
23 the main drag. I don't remember the name of that street.

24 Q. Do you recall what you paid for the labels?

25 A. I don't recall. I don't think I paid for them.

1 Q. [REDACTED]?

2 A. No, I do not.

3 Q. Have you ever met Mr. Abood?

4 A. I have never met Mr. Abood in my life.

5 Q. Do you know Ed Dankworth?

6 A. Yes.

7 Q. Have you met Ed Dankworth?

8 A. Yes.

9 Q. How often?

10 A. I've probably had coffee with him three or
11 four times in my whole life.

12 Q. How many times have you met with Bill
13 McConkey?

14 A. Three times.

15 Q. We've discussed the first meeting where, if
16 I'm correct, you went and talked to him about your
17 problems with Joe Flood. The second meeting where he gave
18 you the rough draft flier.

19 A. That is correct.

20 Q. Tell me about the third meeting.

21 A. The third meeting was after this flier was
22 completed, he asked me to look at it and asked me if I was
23 in full approval, and I said, "That's fine, that's good."

24 Q. Did you receive any promises from anybody for
25 this flier?

1 A. Any promises, I don't understand what you
2 mean.

3 Q. Did anybody pay you, did you receive any
4 money for sending this flier?

5 A. No, no, absolutely not.

6 Q. Are you receiving any financial assistance
7 from any individual unrelated to this flier?

8 A. No.

9 Q. Except perhaps from Mr. Norris?

10 A. No.

11 Q. Are you receiving financial assistance from
12 Mr. Norris?

13 A. Yes.

14 Q. Do you know whether or not he receives
15 financial assistance as a result of this flier?

16 A. That I do not know. I'm sure he did not. It
17 was my idea.

18 Q. What was your prior political involvement
19 prior to your involvement in the Joe Flood campaign?

20 A. None, other than a concerned interest. I
21 have -- My mother has been very active in politics over
22 many, many years in the state of Wisconsin. Has worked on
23 the campaign committee for the governor for our state.
24 One of my lifelong friends is a legislator, or has been a
25 legislator, in the state of Wisconsin for three or four

1 terms.

2 My sister's father-in-law is an assemblyman
3 from the Whitewater district for the state of Wisconsin.
4 I've had many political affiliations with political
5 figures over my years. Friends as well as --

6 Q. What do you mean by "affiliations"? You have
7 known people that are in politics?

8 A. Yes.

9 Q. Have you ever been involved in a campaign,
10 worked in a campaign?

11 A. No, I have not.

12 Q. Did you accumulate any information from
13 any -- about any other candidate in this election, this
14 recent election?

15 A. I looked at the issues for Jay Kertulla.

16 Q. Let me stop you there. What do you mean for
17 Jay Kertulla?

18 A. I looked at -- I was curious. I am new to
19 Alaska. I had no idea how to vote even. You must
20 understand that in order to be able to vote, you must at
21 least have a basic understanding. I don't know what that
22 is, but some knowledge.

23 Q. Why did Kertulla come to your attention?

24 A. Because of the road project that I saw
25 advertised on TV for whatever sum of money that it was.

1 It was taxpayer's money that was used 'o put a road
2 adjacent to his property.

3 Q. Who was running against Jay Kertulla?

4 A. I don't remember.

5 Q. What information did you get on Jay Kertulla?

6 A. I don't remember getting any information.

7 Q. What did you look for?

8 A. In conversation with others more than any
9 other way.

10 Q. You were just curious about him?

11 A. Curious, yes. Normal curiosity, what can you
12 tell me about a senator, or what can you tell me about a
13 legislator that I might want to know, that may be
14 interesting to me as far as helping me understand what
15 their issues are, so that I can have some basic knowledge
16 on how to vote.

17 Q. When you went to the courthouse, did you look
18 up Jay Kertulla's name?

19 A. No, I did not.

20 Q. When you went to the courthouse, did you look
21 up the name of any other candidate for public office?

22 A. No, I did not.

23 Q. Do you know whether or not any other
24 candidate for public office has been previously married?

25 A. Say again.

1 Q. [REDACTED]
2 candidate in the last election had a [REDACTED] marriage?

3 A. [REDACTED].

4 Q. Did you try to find out?

5 A. I really -- I think I centered most of my
6 attention to this individual and I do not know Joe Flood.

7 Q. Well, in fact, Joe Flood is not even in your
8 district, is he?

9 A. No, he is not. /

10 Q. Who is in your district? What district do
11 you live in? /

12 A. I don't remember right now /

13 Q. This fall, did you make any major purchase, a
14 purchase of an automobile, furniture, anything above \$200,
15 or were you involved with anyone else in making a purchase
16 of an item?

17 A. Yes. Joe traded in his Cadillac and bought
18 Blazer.

19 Q. Do you recall when that was?

20 A. Probably November, December. Latter part of
21 November, first part of December. November, it would have
22 been.

23 Q. So this was after he had given you the
24 \$2,000?

25 A. Yes.

1 Q. And after the mailing had gone out?

2 A. Yes.

3 Q. And he traded in his Cadillac and bought a
4 Blazer?

5 A. Yes.

6 Q. Were you involved in that transaction?

7 A. Listening, yes.

8 Q. Is your name on the title?

9 A. Yes, it is.

10 Q. How much money down did you put?

11 A. None. The only money that changed hands was
12 zero cash and only the equity in the Cadillac.

13 Q. Where did you buy the Blazer?

14 A. Alaska Sales & Service.

15 Q. What year Cadillac was it?

16 A. I think a 1979.

17 Q. What model Cadillac was it?

18 A. Seville.

19 Q. Coupe, four-door?

20 A. Yes. Coupe, two-door.

21 Q. What are the monthly payments on the Blazer?

22 A. \$310 a month.

23 Q. What is your monthly rent payment?

24 A. \$850 a month.

25 Q. Were there any other purchases made this

1 fall?

2 A. None. Bought a used couch for \$300.

3 The only reason my name is on that title is,
4 not because I have any money associated with that vehicle,
5 it was simply to allow me to have a credit reference in
6 the state of Alaska, which I do not have any at the time,
7 to help me establish a credit base.

8 Q. Do you know whether or not any other
9 candidate for elected office in the most recent election
10 had ever been behind in child support payments?

11 A. No, I do not.

12 Q. Did you take any action to find out?

13 A. No, I did not.

14 MR. DUNNAGAN: No further questions.

15 MR. PESTINGER: It's Mr. Dunnagan's
16 deposition. He can construct the testimony as he chooses.
17 We'll have our turn later.

18 MR. DUNNAGAN: Let me ask you: Did you bring
19 any additional papers pursuant to my request for
20 production?

21 MR. PESTINGER: What we brought besides
22 Exhibit 4, which is quite a voluminous set of documents,
23 we brought the '81 tax return, it's item two. We have an
24 outstanding objection to two. Number three we have
25 complied with. Number four we've complied with. I think'

1 we've complied with four A, B, C and D. Five I believe
2 we've complied with. Six I believe we've complied with.

3 The only items where you've asked for all
4 records on, checking and savings accounts, 2-A is just not
5 pertinent based on the testimony. So we have an objection
6 to two. So we've -- Either they're nonexistent or we
7 don't have reasonable access to them or we pretty much
8 have produced them. I have some work product that I have
9 on my own, pertaining to Mr. Flood, that hasn't come to me
10 through these witnesses, but that's my work product and,
11 of course, not part of this.

12 MR. DUNNAGAN: Let me go through. Number
13 one, tax returns for '82 and '83, do you have those?

14 THE WITNESS: No, I don't have '82 and '83.

15 MR. DUNNAGAN: You and I discussed this
16 earlier, and you have some objection to that. Let me say
17 that I'll recognize it. I don't believe that the tax
18 returns of either party are that relevant. What I'm
19 interested in are finances having to do with this mailing.
20 That's what I want to focus on. I'm not trying to harass
21 you. I will withdraw my request for tax returns for '82
22 and '83. I reserve the right to remake that request if
23 down the road I think there's something there that I have
24 to see.

25 THE WITNESS: H & R Block couldn't find it on

1 record. I have requested it for you.

2 MR. DUNNAGAN: Let me drop that request. I
3 have no desire to --

4 THE WITNESS: And I have no desire to not
5 produce that, okay? I'd be happy to.

6 MR. DUNNAGAN: Number two, I'm interested in
7 sources of income. I'm very interested in sources of
8 income in October, November, December and up to the
9 present time. We've established an employment history.
10 I'm looking for outside sources of income, I'm looking for
11 payment for having done the Flood mailing.

12 THE WITNESS: I have not received any
13 payments.

14 MR. DUNNAGAN: I appreciate your testimony.
15 I would like to see that verified by any and all financial
16 matters.

17 THE WITNESS: Anything and any way I can
18 possibly give you any information to support that, I would
19 be happy to.

20 MR. DUNNAGAN: I would renew my request for
21 the checking accounts and the savings accounts.

22 THE WITNESS: Very little.

23 MR. DUNNAGAN: As long as I can verify to my
24 satisfaction and my client's satisfaction that we have all
25 the financial records for this period of time.

1 THE WITNESS: Feel free.

2 MR. PESTINGER: Do you want the fall of 1984
3 to January 1, 1985, would that be a reasonable starting
4 point? Do you want September 1, for example, until
5 January 1, 1985?

6 MR. DUNNAGAN: Let's make it from September
7 to January 31.

8 MR. PESTINGER September 1 through January
9 31st.

10 Sarah, he's asking for, and I think it's an
11 objectionable item, from September 1, '84 through January
12 31st, 1985 a record of your checking account records, your
13 savings account records, and any other money management
14 account record; all records which tend to show or verify
15 any sources of income.

16 Do you have any -- If you have an objection
17 to that, I'll be happy to make the objection to the court.
18 If you want to produce your checking account and savings
19 account records for September 1, 1984 through January 31,
20 1985, do you want to do that?

21 THE WITNESS: Not really, but I don't have
22 anything that I'm trying to hide.

23 MR. PESTINGER: You're willing to make that
24 production, okay?

25 THE WITNESS: If it's necessary. I would

1 choose not to.

2 MR. PESTINGER: Do you have these statements
3 readily in your -- Are they readily accessible? You
4 indicated a credit union.

5 THE WITNESS: I would have to go to the
6 credit union and ask for a monthly printout for each one.

7 MR. DUNNAGAN: If you wish, you can give me a
8 letter of permission and I'll go to the credit union.
9 It's immaterial to me how it's done.

10 MR. PESTINGER: Will the credit union give
11 you that printout? I find them very slow.

12 THE WITNESS: Yes, it takes awhile.

13 MR. PESTINGER: Particularly the credit
14 union, I find them very slow. If you would give me a
15 credit union printout, and I'll turn it over to Mr.
16 Dunnagan, for September, '84 to January 31st, 1985. You
17 do your banking at a particular unit?

18 THE WITNESS: U.S.A.

19 BY MR. DUNNAGAN:

20 Q. While you are still under oath, do you have
21 any ~~other~~ accounts anyplace else?

22 A. No.

23 Q. You have no money management accounts?

24 A. No.

25 Q. You have no other savings accounts?

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A. [REDACTED]

Q. [REDACTED]

A. [REDACTED] all of my banking is done at the U.S.A. Credit Union.

Q. The records you are going to give me cover all of the accounts which you have at the Alaska U.S.A. Credit Union?

A. No.

Q. There is no other account I can possibly see?

A. There is not.

MR. PESTINGER: I have a lot of dormant accounts around. You may have --

THE WITNESS: I have an account with the Fairbanks-Morse Credit Union in Beloit, Wisconsin that has a balance of \$6. It has not been used for a number of years.

MR. PESTINGER: I don't even know how many accounts I have in Alaska.

THE WITNESS: I have no other accounts in Alaska with any banking institution at all.

BY MR. DUNNAGAN:

Q. With regard to number three, the cost of the mailing basically was the \$1,920 receipt that you showed me, and that was your one-time payment that covered [REDACTED]

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A. [REDACTED]

MR. [REDACTED] mailing receipt
I believe [REDACTED] testimony on.

THE WITNESS: Yes, [REDACTED] no. I did and that
would be on record at the post office at the airport,
which is where I went to do that.

BY MR. DUNNAGAN:

Q. Are there any other rough drafts or any other
documents?

A. I couldn't find it.

Q. There is not a rough draft?

A. For the \$80, no.

Q. I beg your pardon. Document number four
regarding the Flood mailing. Is there anything else I
haven't seen? Payment documents, rough drafts, research
work?

A. No, you have everything.

Q. You've testified that there are no research
materials on any other candidate?

A. No, I don't have any.

Q. And you've never published a letter, or done
the kind of thing you did to Joe, you've never done to any
other candidate?

A. No, I have not.

Q. [REDACTED] that?

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1 you use [REDACTED] flood matter?

2 A. [REDACTED] no.

3 Q. Have you ever received any compensation from
4 Mitch Abood?

5 A. No.

6 Q. From the Abood campaign?

7 A. I do not know Mitch Abood.

8 Q. Bill McConkey?

9 A. No, never. I am not affiliated in any way
10 with Mitch Abood, his campaign committee. I am not
11 affiliated with Mr. McConkey under any other terms, or
12 with Ed Dankworth or any other outside member.

13 MR. PESTINGER: Counsel, when you look at
14 this Exhibit 4, you'll find that these are processing, it
15 looks like to me, from Washington and Oregon by the former
16 spouses for support here in Alaska. So the information in
17 the flier, I believe, is contained in the Alaska court
18 system. I think that pretty much speaks for itself.

19 MR. DUNNAGAN: I guess that's it.

20 (Off-record discussion)

21 MR. DUNNAGAN: Back on record. While we were
22 off record, Sam Pestinger has found Sarah Clossey's resume
23 and it's now -- we have agreed to make that an exhibit to
24 the deposition. Ms. Clossey is now correcting the resume.

25 Q. With regard to Exhibit 6, that is your

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resume?

A. Yes, it is.

MR. DUNNAGAN: No further questions.

(Exhibit 6 marked for
for identification.)

(Whereupon, deposition
concluded at 11:30 a.m.)



SARAH A. CLOSSEY

1 REPORTER'S CERTIFICATE

2
3 I, GEORGINNA L. BAKER, Stenotype Reporter,
4 hereby certify:

5 That I am a Stenotype Reporter and Notary
6 Public for the State of Alaska; that the foregoing
7 proceedings were taken by me in Stenotype Shorthand and
8 thereafter transcribed under my direction; that the
9 transcript constitutes a full, true and correct record of
10 said proceedings taken on the date and at the time
11 indicated therein.

12 Further, that I am a disinterested person to
13 said action.

14 IN WITNESS WHEREOF, I have hereunto
15 subscribed my hand and affixed my official seal this
16 2nd day of May, 1985.

17
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21 Georginna L Baker
22 GEORGINNA L. BAKER
23 Shorthand Reporter

24 My commission expires 9.15.85
25

IN THE SUPERIOR COURT FOR THE STATE OF ALASKA
THIRD JUDICIAL DISTRICT AT ANCHORAGE

JOSEPH FLOOD,

Plaintiff,

vs.

SARAH CLOSSEY,

Defendant.

Case No. 3AN-84-10829 Civil

ARRIVED

MAY 8 1985 757

APOC-ANOH
PM (HC)

DEPOSITION OF JOSEPH L. NORRIS

Friday, February 1, 1985, 11:30 A.M.

Anchorage, Alaska



420 L Street, Suite 501
Anchorage, Alaska 99501
272-2733 / 272-6134

ALASKA STENOTYPE REPORTERS

Fred M. Getty, RPR
Rick D. McWilliams, RPR



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IN THE SUPERIOR COURT FOR THE STATE OF ALASKA
THIRD JUDICIAL DISTRICT AT ANCHORAGE

JOSEPH FLOOD,

Plaintiff,

vs.

SARAH CLOSSEY,

Defendant.

Case No. 3AN-84-10829 Civil

DEPOSITION OF SARAH A. CLOSSEY,

taken on behalf of Joseph Flood, pursuant to notice, at
the law offices of Jermain Dunnagan & Owens, 3000 A
Street, Suite 300, Anchorage, Alaska, before Georganna L.
Baker, Shorthand Reporter for Alaska Stenotype Reporters
and Notary Public for the State of Alaska.

A P P E A R A N C E S

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For the Plaintiff:

JERMAIN DUNNAGAN & OWENS
By: Charles A. Dunnagan
3000 A Street, Suite 300
Anchorage, Alaska 99503

For Defendant:

PESTINGER & PETTYJOHN
By: Sam Pestinger
605 West 2nd Street
Anchorage, Alaska 99501

Reported By:

Georganna L. Baker

I N D E X

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Examination By:

Page

Mr. Dunnagan

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Exhibits:

A	Copy of check to J. Norris from S. Clossey, dated 11/5/84.	10
B	Blank piece of paper	10
C	Copy of memo pad	12
D	Copy of Alaska State Troopers' report of Mary Norris. (7 pages)	13

1 Anchorage, Alaska, Friday, February 1, 1985, 11:30 A.M.

2
3 JOSEPH L. NORRIS,

4 called as a witness herein on behalf of
5 Joseph Flood, being first duly sworn upon
6 oath by Georganna L. Baker, Notary Public,
7 was examined and testified as follows:
8

9 EXAMINATION

10 BY MR. DUNNAGAN:

11 Q. Would you state your name.

12 A. ~~Joe Lloyd Norris.~~

13 Q. Spell your last name.

14 A. N-o-r-r-i-s.

15 Q. Give your address.

16 A. 6710 Zurich, Anchorage, Alaska, 99507.

17 Q. Do you currently live with Sarah Clossey?

18 A. I certainly do.

19 Q. How long have you lived with Sarah Clossey?

20 A. Oh, some few months.

21 Q. ~~Do you have any idea of when you moved in?~~

22 A. ~~Somewhere around October, November, somewhere~~
23 ~~in that general vicinity.~~

24 Q. ~~What year?~~

25 A. 1 ~~_____~~

1 Q. Are you currently employed?

2 A. Self-employed.

3 Q. What do you do?

4 A. At this point I'm in the middle of
5 reacquiring a business that I owned a portion of and was
6 forced out of through a minor ownership role in the
7 process of acquiring entire ownership of it.

8 Q. What business is that?

9 A. Iliamna Lake Lodge.

10 Q. Other than that you have no formal
11 employment?

12 A. No, that's it. I had a job until recently as
13 an undercover narcotics investigator, but my estranged
14 spouse, soon to be ex-wife, blabbed it all over town, and
15 put the children's lives in jeopardy, and then I resigned.

16 Q. When did you resign?

17 A. I'm in the process of doing that now. I
18 won't be more specific than that.

19 Q. Do you expect to get a paycheck from --

20 A. Absolutely not. I was doing some
21 pre-employment work on my own time to work on some past
22 cases where there's a couple of unsolved homicides
23 involved, and work I could not do as a sworn peace
24 officer, and my pay period was due to start the 1st of
25 this month.

1 Q. Did you ever get -- This undercover narcotics
2 work, was this going to be for the state?

3 A. I'm not going to answer that. It's not
4 germane to the issue here and could get somebody killed.
5 I assume these records will be public records in some
6 manner.

7 Q. So you're refusing to tell me where your
8 paychecks come from?

9 A. I never received a paycheck.

10 Q. From whom?

11 A. Any of the above agencies that you mentioned.

12 Q. When you told me you were going to be working
13 as a narcotics agent, I got the impression you were going
14 to be a narcotics agent for the state; is that true?

15 A. No, it's not true.

16 Q. What is true?

17 A. That I was going to be employed by a
18 governmental agency in that capacity.

19 Q. In what capacity?

20 A. As a narcotics investigator.

21 Q. What governmental agency?

22 A. I decline to answer that.

23 Q. State or federal?

24 A. It's simply not your business.

25 Q. You decline to answer that?

1 A. Yes, I do. If you can show me some
2 relevancy, I'd be happy to answer that.

3 Q. I don't have to show you relevancy.

4 Did you have a source of stable income during
5 the fall of 1984?

6 A. I think probably I am going to have to
7 decline to answer that also. My attorney in my divorce
8 has advised me to be very careful about what I say about
9 my financial income.

10 Q. Who is your attorney in your divorce?

11 A. Stuart Cam Rader.

12 Q. Do you know his phone number?

13 A. Not right off. I think it's 272-2121,
14 something along that line. In fact I may have one of his
15 business cards in my wallet.

16 Q. Do you?

17 A. I think I do.

18 It's 272-1962.

19 MR. DUNNAGAN: Off record.

20 (Off-record discussion)

21 BY MR. DUNNAGAN:

22 Q. You're in the process of divorce, your
23 attorney is Stuart Cam Rader?

24 A. That is correct.

25 Q. Does Mr. Rader know you were going to have

1 your deposition taken?

2 A. Yes.

3 Q. Did he give you specific instructions on
4 questions not to answer?

5 A. No.

6 Q. Did he think it necessary for him to attend
7 this deposition?

8 A. I don't believe so.

9 Q. My last question was: Did you have any
10 sources of steady income during the fall of 1984? Your
11 answer was, you refused to answer; is that correct?

12 A. I think I said "decline."

13 Q. But you do refuse to answer?

14 A. I decline to answer.

15 Q. As you wish.

16 Have you ever worked for Ed Dankworth?

17 A. Yes, one time in the past.

18 Q. Would you tell me about that.

19 A. It would have been in, I believe, the winter
20 also of 1981 to 1982, during that particular winter.

21 I was the Capital Improvement Budget Coordinator
22 working in an office near his in the LEO building
23 downtown, 6th or 7th Avenue, while he was president of the
24 finance committee as a state senator.

25 Q. What were your duties?

1 A. Budget, auditing, restructuring some things
 2 that we thought needed restructuring. Some liaison work.
 3 That's really about it. [REDACTED] I think
 4 I stayed there approximately six months.

5 Q. Have you ever received any other -- Have you
 6 ever worked for Ed Dankworth other than that?

7 A. No.

8 Q. Have you ever aided him in any projects
 9 beyond 1982?

10 A. Several times.

11 Q. In what regard?

12 A. Conversation, a couple of trips to try to
 13 work out some details on a couple of different projects
 14 for him.

15 Q. Do you have a continuing relationship with
 16 Mr. Dankworth now?

17 A. Only as a friend. I haven't seen Mr.
 18 Dankworth in a couple of months.

19 Q. Did you have any meetings with Mr. Dankworth
 20 during the most recent state campaign?

21 A. No. Well, let me qualify that. I had no
 22 business or political meetings with him in any way, shape
 23 or form. I had lunch with him or coffee with him on one
 24 or two occasions.

25 Q. [REDACTED]

1 Q. [REDACTED]

2 [REDACTED]

3 A. [REDACTED]

4 Q. [REDACTED] life?

5 A. [REDACTED]

6 Q. You say you're not involved in politics?

7 A. No.

8 Q. Have you ever been in a situation where you
9 tried to help someone win an election?

10 A. No.

11 Q. Other than this thing with Joe Flood, have
12 you been in a situation where you tried to have someone
13 lose an election?

14 A. No. I might state further that simply
15 because of my association and from the point of being a
16 small child with Mr. Dankworth and observing some of the
17 things that have gone on around him, I don't think I'd
18 choose to ever set foot in that arena. I find it a bit
19 distasteful, primarily because of situations like this.

20 Q. Have you ever heard of Jay Kertulla?

21 A. I know who he is. I've never met the man in
22 my life.

23 Q. Who do you understand him to be?

24 A. A senator from Maine.

25 Q. [REDACTED] ran for

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[REDACTED]
A. [REDACTED]
[REDACTED] it depends on
[REDACTED] were two-year or four-year seats.

Q. Did you have any involvement in that campaign
either for or against Mr. Kertulla?

A. No.

Q. Do you know who ran against him?

A. Not offhand, no.

Q. Do you know if Ed Denkworth had any interest
in that campaign?

A. In Mr. Kertulla's campaign?

Q. Yes.

A. No, I would have no idea whether he did or
not.

Q. Have you ever been asked to participate in
political dirty tricks?

A. No.

Q. Have you ever told a lie to a misdirected
politician or a candidate?

A. No.

Q. Have you ever made an anonymous phone call to
a candidate or a member of his staff?

A. Absolutely not.

Q. Have you ever been asked to do that?

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1 A. Absolutely not.

2 Q. Have you ever even thought about doing that?

3 A. No, the thought would never have entered into
4 my mind until this meeting with you.

5 Q. Do you know anything about how Jay Kertulla
6 financed his mall?

7 A. No.

8 Q. Have you ever overheard any conversations
9 involving Jay Kertulla and his mall?

10 A. No. I think the only time in my life I've
11 seen him was once some years ago when he came into the
12 senate office where Mr. Dankworth, or the one that Mr.
13 Dankworth maintained in that same LEO office. He came in,
14 visited with him, I wasn't even introduced to him.

15 Q. Did you ever make a phone call to Jay
16 Kertulla or anyone on his staff concerning the financing
17 of his mall?

18 A. No.

19 Q. Were you ever asked to make a phone call like
20 that?

21 A. No. I honestly don't know anything about Mr.
22 Kertulla's finances.

23 Q. Did Mr. Dankworth offer you a job if the
24 politicians that vice supported were elected?

25 A. [REDACTED]

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Q. Haven't you seen [redacted] people get elected?

A. No.

MR. PESTINGER: Are you testifying, counsel, or asking questions?

MR. DUNNAGAN: Asking questions.

Q. Have any of my questions about political dirty tricks or anonymous phone calls, do they spark an old memory of yours, anything at all come to mind?

A. Not offhand.

Q. Is this the kind of thing that, if you had done it, would you have easily forgotten?

A. I don't think so, no.

Q. It would have been something that you would have remembered?

A. You're using the label of dirty tricks, that's a pretty broad label. If you care to recount a specific instance you might be thinking about, I might be able to give you a better answer.

Q. Something about Jay Kertulla's malls.

A. I have no idea about Jay Kertulla's finances in any way, shape or form. The man would not know me if he met me on the street.

Q. Was he talking to you?

A. I don't know. I never talked to the

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[REDACTED]

Q. I'm going to use what was an exhibit in the prior deposition. On one side it has a copy of a -- some kind of a \$1,920 receipt Sarah Clossey paid some money to you.

Let's go ahead and marked this an exhibit if you would.

(Exhibits A and B marked for identification.)

BY MR. DUNNAGAN:

Q. The court reporter has handed you a document that's marked Exhibit B.

Off record.

(Off-record discussion)

BY MR. DUNNAGAN:

Q. I wonder if you would write, give me a handwriting sample, if I give you a couple things to write on that page.

A. It would depend on what they are.

Q. The things I would like you to write are: I'm a longtime friend, anonymous message, sounds like somebody is trying to get him.

A. I think I'll pass on that.

Q. What would you be willing to write?

1 A. I have signed my name to the document, I
2 think that's adequate. I have written my address and so
3 on out.

4 Q. You refuse to give me a handwriting sample?

5 A. Right.

6 Q. You refuse to write anything on the page
7 other than your name? Is that yes or no?

8 MR. PESTINGER: Go ahead and say yes.

9 THE WITNESS: Yes.

10 MR. PESTINGER: That is not a proper request
11 for production and we have an opportunity to object.

12 MR. DUNNAGAN: Do you represent Mr. Norris?

13 MR. PESTINGER: No, he is a witness here.

14 MR. DUNNAGAN: Your objection has been noted.
15 It's in the record.

16 Q. Now, Mr. Norris, the way these things are
17 handled, the objection is noted. I may have trouble later
18 on getting this into evidence because an objection has
19 been made. The way discovery is held, the objection is
20 put in the record and then you're going to go ahead and
21 answer the question.

22 Would you go ahead and give me a handwriting
23 sample?

24 A. No.

25 Q. Is there something less offensive you would

1 be willing to write?

2 A. I have already given you all I'm willing to
3 give you. My signature, my address and my phone number
4 written out in my own handwriting on a document. I think
5 that should prove adequate.

6 Q. What document?

7 A. The one at the beginning. The court reporter
8 asked --

9 Q. You refuse to write anything on the Exhibit
10 B?

11 A. Yes, that is correct.

12 Q. Will you sign it?

13 A. No, I have already signed my name.

14 Q. You refuse to sign it?

15 A. Yes, I do. I would be signing a blank
16 statement on a sheet of paper.

17 MR. PESTINGER: Off record.

18 (Off-record discussion)

19 MR. DUNNAGAN: Would you mark this as Exhibit
20 C.

21 (Exhibit C marked

22 for identification.)

23 BY MR. DUNNAGAN:

24 Q. Mr. Norris, would you please review Exhibit
25 C. It consists of three pages from a memo pad that have

1 been stapled to a larger piece of paper. The memo pad
2 states it's: A little memo from Joe.

3 Have you ever had such a memo pad?

4 A. I don't remember one that had my name
5 specifically attached to it. It's very possible but I
6 don't specifically remember it, no.

7 Q. Do you recognize the handwriting?

8 A. It looks like it's mine, but I don't remember
9 any of the incidents or facts or details that are related
10 off of these pages.

11 Q. I've read this a couple times. Why don't you
12 follow along with me while I read this to you. The very
13 top it says something that I don't understand, and below
14 your name on the top sheet there's a phone number. Below
15 that on the right-hand side, there's an 8:15 a.m.
16 Thursday, T-h-u-r, period. Reading at the text, starting
17 at the upper right-hand side, it says: Call Kertulla.
18 Anonymous message. I am long-time friend of Jay's from
19 Wasilla and I can't afford to get involved. I wanted Jay
20 to know that I overheard a conversation the other day that
21 the D.A. in Palmer was asking questions about the way Jay
22 financed his mall. That's all I heard, and I wanted Jay
23 to watch his hind side. Sounds like somebody is trying to
24 g

25 A. [REDACTED] I would have to correct

1 [REDACTED]
2 [REDACTED]
3 over the phone.

4 Q. [REDACTED] why would they have phoned you?

5 A. [REDACTED] I really don't know. Possibly because many
6 people know I'm a friend of Mr. Dankworth's and thought it
7 might have some influence with him. I don't think I
8 brought it to Mr. Dankworth's attention.

9 Q. Did you bring it to Mr. Kertulla's attention?

10 A. Oh, certainly not. I think I dismissed it as
11 a bunch of dribble as a matter of fact and didn't make or
12 issue any action or verbalization to anybody. I don't
13 believe I thought it even warranted bringing to anybody's
14 attention at the time.

15 Q. What else do you remember about this phone
16 call?

17 A. That's been so long ago. It wasn't even
18 anywhere near before the election time. It was months and
19 months before that. I really -- As I said, I copied down
20 some of the information that was given to me over the
21 phone and just dismissed it because it really didn't mean
22 anything to me anyway.

23 Q. What is Mr. Dankworth's involvement with Jay
24 Kertulla?

25 A. I have no idea. You would have to ask Mr.

1 Dankworth.

2 Q. And your testimony is that you never even
3 told him that this phone call had come in?

4 A. I don't believe I did, no. I can't remember
5 exactly, but I think at the time, as I already stated, I
6 just dismissed it as a bunch of dribble.

7 Q. What is your relationship with Sarah Clossey?

8 A. What word are you looking for?

9 Q. Whatever word you have in your mind.

10 A. We're very close friends; probably will
11 finish the rest of our lives together.

12 Q. Does she know that you have a history of wife
13 abuse?

14 A. I do not have a history of wife abuse.

15 Q. Have you ever hit your wife?

16 A. One time. I slapped her with my open hand
17 and chose to walk away from a 15-year relationship that
18 precise morning. That's the only time it ever happened; I
19 don't care what that emotionally disturbed person may have
20 told you.

21 MR. DUNNAGAN: Would you mark this as Exhibit
22 D.

23 (Exhibit D marked
24 for identification.)

25 MR. PESTINGER: The issues of the case are

1 defamation, publication, damages and/or reputation, and
2 privilege. We have a witness here who is not a party.
3 This witness is now being asked inquiries about his own
4 domestic relations and matters. I respectfully submit
5 that these are not within the parameters of relevance, not
6 likely to lead to relevant evidence, and if we are it's
7 done -- it's very -- I don't even know if it is
8 prejudicial. But to me the only value of it is one of
9 prejudice and not of relevance to the issues in this case.
10 I make that objection for the record.

11 MR. DUNNAGAN: I'm asking these questions for
12 credibility.

13 MR. PESTINGER: Even credibility must be done
14 within the parameters of the rules, counsel.

15 MR. DUNNAGAN: Thank you.

16 Q. Have you ever reviewed the police report that
17 I just gave you as Exhibit D?

18 A. Yes, I have seen it in the past. She mailed
19 several copies to various people, some TV reporters and
20 other things, along with other innuendos and suppositions
21 about this, that and the other.

22 MR. PESTINGER: Your divorce matter is
23 pending, Mr. Norris?

24 THE WITNESS: Yes, it is. I might add that
25 this is a worthless piece of paper. It's a statement from

1 her and a part of a piece of a police report. The officer
2 involved could be contacted, but I defy you to show where
3 I've ever been charged even, much less convicted of
4 assault and battery against any woman.

5 BY MR. DUNNAGAN:

6 Q. Let's go to the fourth page in.

7 A. The fourth page in from the top?

8 Q. Just after the pictures.

9 A. Yes.

10 MR. PESTINGER: You know, Mr. Norris --

11 BY MR. DUNNAGAN:

12 Q. The interview you gave with the officer in
13 the case, you told the officer you slapped her once.
14 That's the same story you told us?

15 A. Yes.

16 Q. Would you go to the next page. On the top is
17 the interview with Mary Norris, which I'm sure you're
18 acquainted with. The officer relates that she claims that
19 you punched her in the face multiple times, choking and so
20 on. But at the bottom there are some observations.

21 Are you aware that the officer felt that the
22 injuries that Miss Norris received were consistent with
23 her testimony and not yours?

24 A. No, I'm not aware of that. I think if the
25 truth ever came out, I didn't bother to examine it, but

1 there was one 12-pack of beer in the home, there was one
2 can of it opened in the house. The beer was in fact Mrs.
3 Norris'. She is the only one in the home that did any
4 drinking at all. I may have consumed, from this precise
5 date for the past 15 years, may have consumed one 12-pack
6 of beer in that entire 15 years. It's her alcohol.

7 Q. So you disagree where the police report says,
8 "Mary Norris has bruises around her right eye, scratches
9 on her face and neck and slight swelling of her upper lip,
10 all of which conform with her version of the assault"?

11 A. Well, I really don't know what to say. I
12 think your question is a bit redundant. I really don't
13 know how to answer you. Who am I to argue with the state
14 trooper's report?

15 Q. So he's correct then?

16 A. Well, I wouldn't say that, no. All I know is
17 that she had -- All I know that she had was a
18 nonlacerated, noncontused swollen eye. That's all I'm
19 aware that she had at all. The eyeball itself was not
20 involved. There was a simple, very minor black eye of
21 which I certainly did.

22 But there's a bit more to the story. And
23 really it isn't so much that I don't want to tell it, it's
24 really that I'm a little bit ashamed of it and I don't see
25 the relevance to this issue at all. I don't think I

1 really care to get any further into it. There's two sides
2 to every story.

3 Q. Are you finished?

4 A. Certainly.

5 Q. You did not punch her in the face?

6 A. I don't really know what happened.

7 Q. You contest the trooper's stated observations
8 in the report; is that correct?

9 A. I don't really think I care to get into it
10 any further.

11 Q. You refuse to answer?

12 A. I don't think I care to answer any more
13 questions pursuant to my estranged spouse. They're
14 frankly none of your business.

15 Q. Are you currently under an order of child
16 support?

17 A. I'm under several. I don't really know which
18 one is accurate. The first one that I made some payment
19 on, I've been unable to make any further payment on, plan
20 to do so as soon as I can. I'm under several that are --
21 Well, I don't know. There's been a fraud committed upon
22 the court by her and her attorney, and we're about to get
23 to that.

24 Q. ~~Are you currently under an order of child support?~~

25 A. ~~At this present moment, no.~~

1 Q. Were you current in your child support
2 obligations in November?

3 A. I really couldn't tell you because I'm not
4 sure in my own mind at this point which dates on which
5 orders read when I'm supposed to do what. It's all rather
6 confusing.

7 Q. Do you know whether or not you were current
8 on your child support --

9 A. In November, no.

10 Q. -- in October?

11 A. At some point in the time in the onset of the
12 thing, yes, I was. I can't tell you what date that was
13 and what date it was not.

14 Q. Can you give me a season?

15 A. I have no idea.

16 Q. When did you file for divorce?

17 A. I didn't originally, she did, and I can't
18 tell you when she did. We were going to do a dissolution
19 and she got ahold of an attorney that thinks I'm made of
20 cash and wants to give her the keys to the gate. We had
21 all the basic agreements worked out as to a dissolution.
22 She decided at the last minute to attempt to do some
23 things like this that are outright slander, because some
24 of the things that she's presented here are not accurate.
25 But some of the things you presented to Sarah in your

1 letter were not accurate, so what can I say?

2 Q. Do you make your child support payments, when
3 you make them, through the office of child support
4 enforcement?

5 A. No, I make them directly to her, and got
6 receipts for same.

7 Q. Do you keep the receipts?

8 A. No, my attorney is in possession of them.

9 Q. That's Stuart Cam Rader?

10 A. That is correct.

11 Q. Just so I'm clear, you do not know whether or
12 not you are current on child support obligations in
13 October and November of 1984?

14 A. I think I would choose again to ask you to
15 stop asking me questions about my estranged spouse because
16 I will answer no more.

17 Q. You refuse to answer?

18 A. Yes, I do refuse to answer.

19 Q. Are you an alcoholic?

20 A. No.

21 Q. Are you a heavy drinker?

22 A. No.

23 Q. Your testimony is that you have had how much
24 liquor in the last 15 years?

25 A. I think we'll let the record reflect that.

1 Q. How much?

2 A. I already answered your question.

3 Q. I can't recall the answer.

4 A. Nor can I.

5 MR. DUNNAGAN: Would you go back and read
6 that back.

7 (Record read)

8 BY MR. DUNNAGAN:

9 Q. The court reporter has read us your previous
10 testimony. You indicated you may have consumed one
11 12-pack of beer during the last 15 years. Is that still
12 your testimony?

13 A. I would say my probable yearly average may
14 have been a can or two of beer, with some years I didn't
15 have any.

16 Q. Have you ever been to counseling?

17 A. For what?

18 Q. For anything.

19 A. Been with my ex-spouse several times because
20 of her problems.

21 Q. Does your ex-spouse have a drinking problem?

22 A. Oh, I don't think so. I didn't mean to
23 intimate that, if that's the way you took it. But I just
24 meant to identify that the alcohol that was in the house
25 at that particular night was hers, not mine.

1 Q. You talked earlier about your current spouse,
2 the one that you are currently divorcing, Mary Norris,
3 having mental problems.

4 A. I think, the only way I can answer that is,
5 I'm of the opinion that if she was seriously evaluated,
6 that she wouldn't be released immediately without some
7 serious structural counseling of her own. That's,
8 however, opinion and not necessarily fact.

9 Q. What was your involvement in the Abood
10 campaign?

11 A. I didn't have an involvement in the Abood
12 campaign. I can remember being introduced to Mr. Abood
13 one time somewhere between six months and two years ago in
14 a restaurant. I didn't even sit at the table. I had no
15 conversation with him other than, "It's nice to meet you."
16 I know who he is by seeing him on TV commercials and
17 hearing his voice here for some 20 years.

18 Q. What was your involvement with the Joe Flood
19 flier?

20 A. Probably encouragement, reinforcement in what
21 Sarah wanted to do. Some minor research here and there.

22 Q. What research did you do?

23 A. Obtained some court records.

24 Q. What court records?

25 A. Oh [REDACTED]

1 They're court records there from two or three states.

2 Q. [REDACTED] the specifically what it was
3 that was [REDACTED] the best of your recollection?

4 A. [REDACTED] the pieces of paper involved from
5 any one of a number of two or three different parties.

6 Q. Would you tell me what parties.

7 A. No, I wouldn't care to identify those parties
8 right now.

9 Q. Would you tell me what papers.

10 A. The papers that are in front of you. Well, I
11 should maybe state --

12 Q. Have you reviewed the papers in front of you?

13 A. -- some of them.

14 I didn't read through all of them, just some
15 of them.

16 Q. In other words, you have two to three sources
17 of information, which you refuse to disclose, which you
18 used in getting information on Joe Flood; is that what
19 you're telling me?

20 A. They were not sources of information. They
21 were people that I simply became aware that they had some
22 paperwork.

23 Q. You gave this paperwork to Ms. Clossey?

24 A. Yes, I did.

25 Q. [REDACTED]

2

1 paperwork.

2 A. [REDACTED]
 3 [REDACTED] to do primarily, I believe, to the best of
 4 [REDACTED] son, with nonsupport actions, things like
 5 [REDACTED]

6 Q. How did you come across these individuals who
 7 had this information?

8 A. I don't remember; it's been some time.

9 Q. Do you know how much the mailing cost?

10 A. No, I have no idea what any of the specific
 11 costs were. With the exception of the bulk mailing
 12 permit, I know how much that was.

13 MR. DUNNAGAN: Let the record reflect that
 14 Mr. Pestinger is giving the witness a note.

15 Again, counsel, is this your witness? Do you
 16 represent Mr. Norris? Then let me object to giving him
 17 notes if you don't represent him and ask you to
 18 discontinue doing that.

19 THE WITNESS: At any time you --

20 MR. PESTINGER: I would like to confer with
 21 the witness. Let me put it on record.

22 (Off-record discussion)

23 THE WITNESS: I got some of the things. I
 24 know she obtained some of them. I don't really remember
 25 who got what.

1 MR. PESTINGER: Do you have a question?

2 MR. DUNNAGAN: Would you like to finish the
3 testimony that you were having him give?

4 THE WITNESS: I'm not having him give any
5 testimony.

6 MR. DUNNAGAN: As we came back on record,
7 counsel and the witness were telling me that both of the
8 individuals had gotten some records. May I see the note
9 that you gave to the witness prior to going off record?

10 MR. PESTINGER: No, that's my work product.
11 You may ask a question.

12 BY MR. DUNNAGAN:

13 Q. What was the discussion that you had with
14 counsel when you went outside?

15 A. I don't choose to answer that.

16 Q. Is Mr. Pestinger your lawyer?

17 A. No, he's a friend. I'm not trying to
18 down-play my role in what I helped Sarah do at all. I'm
19 just saying that I had a, minor role in it wouldn't be
20 accurate, a major role wouldn't be either. I can't
21 remember day-to-day verbatim some of the things you are
22 curious about.

23 MR. PESTINGER: Do you have a question, Mr.
24 Dunnagan?

25 MR. DUNNAGAN: Yes.

1 Q. How did Sarah become interested in [REDACTED]

2 A. I don't know. I have several comments I
3 could [REDACTED] but I think you're asking me a very
4 poor question that you really should ask Sarah.

5 Q. I did ask Sarah. Would you please make the
6 comments that you had in mind.

7 MR. PESTINGER: Calls for speculation.

8 BY MR. DUNNAGAN:

9 Q. How do you know the answer if it's not even
10 there?

11 A. Well, like I said, we've had some serious
12 discussion about it. But I think, since you want to know
13 an opinion or a reason that someone else made some or had
14 some thought, I think you should get it from that person.

15 Q. I would like it from you.

16 A. I choose not to answer it.

17 Q. Do you know if Sarah has any prior political
18 involvements?

19 A. I don't believe that she does.

20 Q. Do you know if Sarah was interested in any
21 other candidates?

22 A. I don't believe that she was, no.

23 Q. And you refuse to say why she was interested
24 in the Flood?

25 A. I don't see how I can give you an accurate answer.

1 Like I said, it's just cursory conversations that we've
2 had in the reasonable distance in the past, and I would
3 hate to misrelay a fact.

4 Q. I would accept your answer based on that
5 disclaimer.

6 A. I think I've commented sufficiently on it.
7 I've given you a fair reason, I think, for not wanting to
8 comment any further on it.

9 Q. Do you know the representatives that were
10 elected from your district?

11 A. From my district, no.

12 Q. Where you live now --

13 A. I have no idea.

14 Q. -- with Sarah Clossey?

15 A. I have no idea.

16 Q. Do you know who ran?

17 A. Not in my district.

18 Q. Does Sarah?

19 A. I don't know, ask Sarah. Because, I told you,
20 I really have no political interest from what I've seen of
21 some of the players involved. It seems to taint people
22 I've seen people that probably did things different than
23 they might have done before they got in politics, I don't
24 know, that's just an opinion on my part, but I don't think
25 I have

1 Q. It doesn't taint somebody to be a narc?

2 A. I don't think so, no. I think it's a very
3 useful and admirable job in the community. Unless you
4 agree that cocaine abuse and drug abuse by our children
5 and adult population is a good thing. Maybe you should
6 qualify your comment, since you chose to make a comment
7 about my personal life.

8 Q. Have you ever accepted money based on the
9 flier?

10 A. Certainly not.

11 Q. No one paid you or made you any promises?

12 A. Certainly not.

13 Q. Then your financial records would have
14 nothing to hide in that regard?

15 A. No. I've requested a copy of my checking
16 account from Fed Alaska Credit Union, to be submitted to
17 you as soon as it's finished. They told me it would take
18 some few days to pull it because they only keep the
19 month's current business on their computer. The rest of
20 it has to be pulled from microfilm.

21 Q. Your subpoena was given to you about six
22 weeks ago.

23 A. That's true, but it's a request.

24 Q. What's a request?

25 A. The information you wish me to disclose are

1 requests; they're not court orders. I don't have to give
2 you anything at this time. I choose to give it to you.

3 Q. Would you take these documents you were
4 served with, and perhaps asked a legal opinion --

5 A. I already did. The summons means I have to
6 be there. The request for disclosure doesn't mean that I
7 have to disclose anything to you at this point. I choose
8 to because there isn't anything to hide. Yes, I was not
9 timely in my request to the bank to have it done.

10 Q. So it's your position that there is no valid
11 subpoena for records against you at this time?

12 A. That's my belief, that's correct. But I
13 choose to give it to you anyway.

14 MR. PESTINGER: What I've reviewed is a
15 request for production to Sarah; that's the only document
16 I've seen, and that was a request for production and that
17 was not a subpoena. That gives me an opportunity to
18 object to the request, which we've done, and we're in good
19 compliance with that request.

20 MR. DUNNAGAN: Do you have any particular
21 objections to my subpoena?

22 MR. PESTINGER: I'm getting to that. As far
23 as the document that you were served with, Mr. Norris, I
24 haven't seen that document. It may be a subpoena, it may
25 be issued by the clerk. I don't know, I haven't reviewed

1 it. If I've caused you some confusion on that point, I'm
2 sorry, I haven't seen it.

3 It's possible that you were served with a
4 court issued subpoena, and it would be up to Mr. Dunnagan,
5 if you were served with a court subpoena, I don't know
6 that, then it would be up to Mr. Dunnagan to show cause,
7 for example, of why you should be held in contempt for not
8 complying.

9 THE WITNESS: I've done the best I can to
10 comply, not in a timely manner. I certainly agree I
11 should have turned in the request to the bank, and I
12 apologize for that.

13 MR. PESTINGER: But you did turn it in and
14 you are getting the records?

15 THE WITNESS: The records will be made
16 available to you as soon as they're in receipt to me. I
17 haven't filed taxes in the last three years. I haven't
18 had enough income to make it necessary, and I've been a
19 little bit leary of what the IRS was going to do until I
20 got the last partnership income tax filing from my
21 partners, one of whom is deceased, and there are a lot of
22 complications involved. I will be filing my taxes for all
23 three years very shortly.

24 MR. PESTINGER: Basically, we are complying
25 to request number two, and, basically, we're complying

1 with it anyway.

2 THE WITNESS: I have no objection to giving
3 you my checking account or my savings account records.

4 MR. DUNNAGAN: Please be advised I will be
5 moving for an order to show cause. If I get the records
6 before it's heard, that will be sufficient. Since the
7 subpoena has been outstanding for so long now, I do --

8 THE WITNESS: The lady at the bank told me
9 they would be obtainable or pick up-able by me either
10 today or Monday. As soon as I have them, you'll have
11 them.

12 MR. PESTINGER: If you would give them to me
13 first so that I could observe them.

14 THE WITNESS: Certainly.

15 MR. DUNNAGAN: Why are you going to give them
16 to Sam Pestinger first?

17 THE WITNESS: Because my friend asked me to.
18 I haven't retained him as counsel, but --

19 MR. PESTINGER: Since they were presented at
20 the deposition, I will inspect them.

21 MR. DUNNAGAN: Why don't we just reconvene
22 the deposition at that time when you've read them.

23 Q. Let me say that the tax returns for '82 and
24 '83 --

25 A. There are none.

1 Q. In addition to that, I have withdrawn my
2 request for Ms. Clossey's records in that regard and I
3 withdraw my request for yours. I need not trouble you for
4 those.

5 A. If I had those, you're welcome to them.

6 Q. I do need financial records for the fall of
7 1984.

8 A. I think that account I opened in August, I
9 think it was August. It may have been March of '84.
10 Before that time I had a joint account with my ex-spouse
11 that I never closed out, and whatever records survive from
12 that, you might have to get from her.

13 Q. Let's talk about your accounts, specifically,
14 for a few minutes. What accounts do you have?

15 A. I have a checking and a savings account.

16 Q. Where is the checking account?

17 A. They're both at the same place. At the
18 Alaska Federal Credit Union, and mine is the Dimond branch
19 is where they're at. You'll find a very minimum amount of
20 financial activity through them, not even enough to
21 support a household.

22 Q. Is that because you do most of your
23 transactions in cash?

24 A. It's because I haven't had much of an income
25 lately. Again, I don't really wish to get personally into

1 my financial concerns. It's not that I have anything to
 2 hide from you, please don't misunderstand. It's that I
 3 have to hide from my ex-wife, or soon to be ex-wife.
 4 She's attempting by both fair and foul means to take me
 5 for whatever she can. We've made a full and fair
 6 separation and division of properties and so on when we
 7 split up, which she got the big end of the pie already.

8 Q. Have you made any major purchases this fall,
 9 the purchase of an item which has a listed price in excess
 10 of \$300?

11 A. Nothing short of a vehicle that I purchased.
 12 I traded in a Cadillac which I owned, which I got 1300 or
 13 \$1800 equity out of, and it was used as the down payment
 14 on a 1984 Chevy Blazer, which I'm driving now and it's
 15 parked outside. It's still financed to the hilt. I
 16 probably owe 12 or \$13,000 on it, maybe 14 with finance
 17 charges. I haven't had the money to make any major
 18 purchases of toys or whatever you might care to label
 19 things like that.

20 I'm an avid gun nut. If I could afford to
 21 spend any money, it would probably be on a gun, and I
 22 haven't purchased any new ones in several years.

23 Q. Back to Exhibit A. Let me invite you to
 24 examine Exhibit A. Have you seen this before?

25 A. I [redacted] receipt.

1 but it may [REDACTED] what her
 2 [REDACTED] look like.

3 Q. [REDACTED] you get a check from Sarah Clessey in the
 4 [REDACTED] 1/20?

5 A. Yes, I did.

6 Q. What did you do with that?

7 A. I cashed it and dropped the money off to Mr.
 8 McConkey to pay the bill.

9 Q. Why does that document indicate loan payment?

10 A. Because it was money that I gave her. She
 11 may have chosen to label it as a loan to do this with.

12 Q. When you gave her that money, you gave it to
 13 her in cash?

14 A. Yes, I did. She deposited it in her bank and
 15 that's probably why the check reads like it does.

16 Q. Did you withdraw this money from any account
 17 that you've had?

18 A. No, I did not.

19 Q. You had \$2,000 in cash?

20 A. [REDACTED] borrowed it.

21 Q. Who did you borrow it from?

22 A. I don't wish to disclose it.

23 Q. When did you borrow it?

24 A. God, I couldn't give you an exact date.
 25 Sometime around the date that she originally, [REDACTED]



1 [REDACTED]
2 [REDACTED]
3 [REDACTED] in this area, not in per- [REDACTED] dirty
4 tricks. [REDACTED] saying he has some experience in politics.

5 Q. Did you pay the loan back?

6 A. No. I have not.

7 Q. Did Mr. McConkey loan you the money?

8 A. No, certainly not. None of the people
9 involved in any of your documents that you have issued out
10 of this office, Ed Dankworth, Mr. Abood, Mr. McConkey,
11 have never been involved. The only transaction that I've
12 had with any of these people that could be even remotely
13 construed with this would be giving the funds to Mr.
14 McConkey for Sarah. I happened to be going downtown
15 anyway.

16 Q. Do you have any outstanding loans?

17 A. I have one at the Calais, I don't even know
18 the name of the bank. It's several years outstanding for
19 \$7,000. That's probably about it. I've got about
20 two-and-a-half million dollars worth of partnership debts
21 and business debts that the payments aren't current on.

22 Q. Were you aware in late October or November of
23 1984 that Sarah Clossey was a counselor for abused women?

24 A. Yes, she had mentioned to me several times
25 that she had counseled abused women and taken them into

///

1 her home in Wisconsin, where she's from. I don't
 2 remember, there was a couple of classifications of types
 3 of women that she had counseled and I don't really
 4 remember what they were offhand.

5 I'm also aware that she had counseled two
 6 different women here locally, and helped them. I think,
 7 partially solved their problems and their marriages.
 8 She's also registered out at the, whatever, the Women's
 9 Resource Center, something along that line, as a counselor;
 10 although I don't think she's actually set up a schedule to
 11 see people at this point in time.

12 Q. Do you have any outstanding personal loans?

13 A. That I've made or that I owe?

14 Q. That you owe.

15 A. Not that I can recall, no. As I said, I owe
 16 a considerable amount of money that's structured in
 17 payments to both a state lending agency, to a bank. In
 18 relationship to the lodge, I owe a loan which I already
 19 told you about. I think it's Bank of the North, the
 20 Calais Center. To my knowledge, that's all

21 Q. Is there any way for me to track the source
 22 of money used in the mailing? It would be very helpful if
 23 I knew what the source was.

24 A. I recall that I borrowed it from a friend
 25 of mine, a long-time associate who is not involved in

1 [REDACTED]
 2 [REDACTED] perfects in any way, shape or form. He's a local
 3 [REDACTED] to a small [REDACTED] [REDACTED] a restaurant [REDACTED] in
 4 [REDACTED]

5 Q. I assure you that I will get a court order.
 6 It would be much easier if we just --

7 MR. PESTINGER: Off record.

8 MR. DUNNAGAN: No, not off record. I object
 9 to you acting as his counsel without you admitting that
 10 you're acting as his counsel.

11 THE WITNESS: Well, at this point I refuse to
 12 tell you who it is. I may through further discussion with
 13 my own counsel or with Mr. Pestinger, as a friend, decide
 14 that I can tell you that. But at this point the person
 15 specifically, I bounced this off of him a few days ago and
 16 he specifically asked that he not be involved because he's
 17 a close past family friend of both myself and my
 18 ex-spouse. We have had some personal business dealings in
 19 another country of which he's still highly involved, and
 20 they're very sensitive, and it could possibly come back
 21 and cause him some problems.

22 BY MR. DUNNAGAN:

23 Q. The fact that he loaned you \$2,000?

24 A. Yes. As he sees it, he could become involved
 25 in my divorce action and he doesn't want to be. He's one
 of those people that doesn't like to take sides, he would

1 [REDACTED] with my ex-spouse and me
2 SURE [REDACTED] to you under any oath that you
3 [REDACTED] funds --

4 Q. [REDACTED] already done that.

5 A. -- was nowhere even in this part of the state
6 politically. Might as well come from Mars politically; it
7 has no bearing on it.

8 Q. Do you think your friend is better served if
9 I obtain his name through a court order?

10 A. I don't know if I would give you his name
11 through a court order. I realize what contempt is and
12 what could happen to me, but I still might choose to
13 accept that. I'm not sure what I will do.

14 Q. I'm sure your attorney will discuss that at
15 length.

16 I have no further questions.

17 MR. PESTINGER: No questions.

18
19 (Whereupon, deposition
20 concluded at 12:45 p.m.)

21
22
23
24 [REDACTED]
25 JOSEPH L. NORRIS



**The Official
Court Record
of
Joseph M. Flood
Candidate for State Senator**

**JOSEPH & MYRNA FLOOD
OR PRESENT OCCUPANT
3423 W 79TH
ANCHORAGE AK**

99502

116

Joe Flood Claims the Legislature is a Family & He is a Family Man

He Left Two Families — Now he Wants Your Vote

In Washington

Joe was divorced by Pauline Flood for **extreme cruelty**, left one daughter, Piper Flood, and was ordered to pay \$50.00 per month child support.

He did not pay!

Pauline Flood was forced onto public assistance welfare in Washington State. The State of Washington had to request the State of Alaska to find Joe Flood and get him to pay. Alaska attempted to do so . . . but Joe Flood did not pay. It's in the record -- Case No. 75-8065.

In Oregon

Joe left Beverly Rose Flood and 3 children — Joseph Flood, Shannon Flood and David Flood. He was ordered to pay \$75.00 per month per child for child support.

He did not pay!

Beverly Rose Flood was forced to ask the State of Oregon to get the State of Alaska to find Joe Flood and to get him to pay. Alaska attempted to do so at taxpayers' expense and cost. The case was not dropped until 1981. It's in the record — Case No. 74-192.

My name is Sarah Clossey. I paid for this flyer myself. I live at 6710 Zurich. I have 4 children. I was an abused wife whose husband did not pay. I am now a counselor for abused women. I see too much of this.

117

611

①



APOC-ANOH
PM (HC)

MAY 3 1985

ARRIVED



120

FILE NO. 884-1823

ALASKA STATE TROOPERS, B DETACHMENT ANCHORAGE POST.

INVESTIGATED BY TPR. J. JOHNSTON DATE(S) INVESTIGATED 1-28- 84

TITLE OF CASE ASSAULT 4th DEGREE - SUPPLEMENT

INTERVIEW: JOE NORRIS - #4 DI

JOE NORRIS stated that he knew he should not have hit his wife, but he did. She came upstairs yelling at him, and he had been drinking beer. When she came up he got mad and took her downstairs. She started kicking him so he slapped her once. He thinks she has an emotional problem. NORRIS was served with the Summons when he was served with a restraining order and domestic violence papers.

ARRIVED

MAY 1985

APOC-ANOH PM HC

DATE TYPED 1-30-84 INDEXED BY S.B.

APPROVED BY DATE

PENDING COMPLETED

COPIES TO 121

FILE NO. B84-1823

ALASKA STATE TROOPERS, B DETACHMENT ANCHORAGE POST.

INVESTIGATED BY TPR. J. JOHNSTON DATE(S) INVESTIGATED 1-24- 19 84

TITLE OF CASE ASSAULT 4th DEGREE

DISPATCH

AST was dispatched to the NORRIS residence on Elmere to respond to an assault.

INTERVIEW: MARY NORRIS - #3 Pg. 1

MARRY NORRIS advised that at about 3:30 AM on 1-24-84, her husband and two friends were upstairs drinking beer, while she was downstairs in the bedroom trying to sleep. She was upset because they were making noise. She went up to ask them to go to Denny's restaurant so she could sleep. Her husband JOE NORRIS became upset and followed her downstairs. He grabbed her hair and threw her on the bed. As he came toward her, she started kicking at him to keep him away. He got to her and sat on her, holding her down. He then started punching her in the face. He hit her several times, bruising her right eye. He also grabbed her around the throat and choked her leaving a red mark on her neck. After the incident, he went back upstairs with her and made her wait in the bathroom until his friend left. She asked them to call the police but they wouldn't help. They left and JOE put ice on her eye and they watched a movie. She was afraid to upset him by leaving the room.

At about 7:30 JOE took the children to school and she called the police. This is not the first time this has happened. In September of 1983, he got upset at her and poked her in the eye, leaving it black and blue.

INFORMATION:

NORRIS was advised to go to the courthouse to petition for a domestic violence order against her husband. She was also advised about the Awake Shelter but advised she was going to stay in the house, and that her husband was going to leave. JOE NORRIS had left the residence and could not be contacted.

OBSERVATIONS:

MARY NORRIS has bruises around her right eye, scratches on her face and neck and slight swelling of her upper lip, all of which conform to her version of the assault.

ARRIVED

MAY 3 1985

APOC-ANCH

DATE TYPED 1-27- 19 84
BY S.B.

APPROVED BY _____
DATE _____ 19 _____

PENDING
 COMPLETED

COPIES TO: PMI (12) 122

CODE: 31 K - DEAD BEFORE REPORT MADE, L - CAPACITATING, U - EVIDENT, Q - POSSIBLE, D - NO VRY, S - SATISFACTORY, P - POOR, C - CRITICAL
 DOC - DEAD ON ARRIVAL (MULTIPLE DOES MAY BE USED)

12-201A
 (REV. 9/81)

WHEN MAKING COMMENTS INSTRUCTION 39 (DETAILS) PLEASE USE THE NUMBER OF THE SECTION AS YOUR PARAGRAPH HEADING RATHER THAN WRITING ONE OUT. PLEASE CIRCLE ALL SECTION NUMBERS IN THE BODY OF THE REPORT WHEN MAKING COMMENTS ON THESE SUBJECTS IN THE DETAILS SECTION.

18	Evidence of Scene	Tire Tracks	Foot Prints	Finger Prints	Clothing	Weapon(s)	Drugs	Spent Slugs	Blood	Hair	Floor	Glass	Tool Marks	Other	Photos of bruise				
19	Evidence Obtained	By: Johnston		Date: 1-24-84	20	Condition at Scene	Careful Search	21	Search	Med.	Select	Severe	None	Estimated Damage \$					
22	Object of Attack	Safe	Cash Reg.	Locker	Drawer	Other	23	Type of Attack	Peel	Punch	Burn	Drill	Pack	Other					
24	Property Taken	Cash	Coin	Fur	Jewelry	Weapons	Other	25	Nature of Larceny	Shop-Lift	From Auto	Auto Parts & Access.	Bicy-cles	From Sleg.	Coin Op.	Other			
26	Suspect Worn	Coat	Kind	Color	Hat	Kind	Color	Glasses	Kind	Color	Kind	Color	Kind	Color	Shoes				
Other Description or Identikit Number		Color	Seats	Kind	Color	Shirt	Kind	Color	Sweater	Kind	Color	Gloves	Kind	Color					
27		Suspect Can Be Ident.	Yes	No	By: (Re: To No.)	Photo Avail.	Yes	No											
28	Weapon Held In	Left Hand	Right Hand	29	Weapon Was	Pistol	Revol.	Rifle	S/Gun	SBl. Len.	Knife	Club	Color	Other Type or Further Description	30	Weapon Recovered	Yes	No	
By:	Date	Make	Type	Model	Cal.	Serial Number	Sbl. Length	Ident. By											
Victim Info	No. and Condition (Code)	Hospital	Dr.	Mortuary	Autopsy Required	Yes	No	Performed By:											
Officer Attending	Victim F/Print	Yes	No	Next of Kin Notified	By:	32	Photos Taken	Scene	Victim	Evid.	Autop-	Other	B&W	Color	Video Tape	Minutes			
33	Evidence Property Location	Where	Property List Attached	Yes	No	Property List With Evidence	Yes	No	Value Prop. Stolen	Val. Prop. Recovered	Agency Recovering								
34	Breath Test Refused	Yes	No	% B.A.	Given By	Witnessed By	Location	Inst. No.	Date	Time	Other Tests Requested								
35	Statements Taken From	2	4	5	6	Others	36	Exhibits for D.A.	Diagrams	Implied Consent	Aico. Inf. Rpt. Form	Waiver of Rights	Other						
37	ACIC Input	Hit	Date Entered	Items Entered	38	NCIC Input	Hit	Date Entered	Items Entered										
39	Details/Comments	SYNOPSIS: B84-1823																	
At about 3:30 AM, on 1-24-84, JOE L. NORRIS punched MARY NORRIS in the face several times, bruising the area around the eye. JOE NORRIS was issued a citation to appear in court on 3-2-84, at 9:00 AM.																			
CASE STATUS:																			
Closed by arrest																			
ARRIVED																			
MAY 1984																			
AFOC ANOH PM (HC)																			
123																			

40	Investigated By:	Referred To:	Supv. Closing	Disposition	Date
	J. JOHNSTON	District Attorney	<i>[Signature]</i>	Closed, am	2-3-84

DEPT. OF PUBLIC SAFETY

DETACHMENT/POST OR CONTRIBUTING AGENCY B - ANCHORAGE

FILE NO.: B84-1823

12-301 (REV. 9/81) INV. REPORT

1 Type of Offense or Complaint	Resource Alloc. Complaint Code	Final Classification			Criminal Code Section	
1501		ASSAULT 4th DEGREE			11.41.230 (a) (1)	
Date, Time Officer	Date of Offense	If Not Known Approx. Date	Time of Off.	Day of Week	Date and Time of Report	Reporting Officer (Print Name)
	1-24-84		3:30 AM	TUES.	1/24/84 9:00 AM	J.J. JOHNSTON (JJJO)

2 Location of Offense or Complaint
 NORRIS RESIDENCE, CORNER OF ELMORE ROAD AND TWILIGHT LANE, ANCHORAGE

3 Code Name	Sex	Race	D.O.B.	Age Range	Ht.	Wt.	Hair	Eyes	Net	Build	Corr. Lenses
CVI MARY CALL NORRIS	F	W	7-17-50		65	115	BRO	BLU	US	MED	--
Address		Phone	Social Sec. Number		Op. Lic. Number		State		Date O.L. Exp.		
SRA Box 5478/Elmore Road		345-1801	256-88-6258		0601180		AK		86		
Work Address		Work Phone		Occupation			Place of Birth				
621 W. Dimond Anchorage		344-9601		Receptionist							

Advised of Rights	Yes	No	By:	Date	Interviewed at:	By:	Date	Time
					Scene	Johnston	1-24-84	9:00AM

Charge, Suspected Of:	Booking Number	Criminal Record	Yes	No	Record Attached	Yes	No	Record Available At:	Warrant Date

4 Code Name	Sex	Race	D.O.B.	Age Range	Ht.	Wt.	Hair	Eyes	Net	Build	Corr. Lenses
DL JOE L. NORRIS, JR	M	W	10-12-47	36	71	220	BLA.	BRO	US	MED	--
Address		Phone	Social Sec. Number		Op. Lic. Number		State		Date O.L. Exp.		
SRA Box 5478, Anchorage		344-1801	574-16-7415		0190881		AK		85		
Work Address		Work Phone		Occupation			Place of Birth				
Iliamna Lake Lodge				Co-Owner							

Advised of Rights	Yes	No	By:	Date	Interviewed at:	By:	Date	Time
		X			ANCH POST	Johnston	1-24-84	4:00pm

Charge, Suspected Of:	Booking Number	Criminal Record	Yes	No	Record Attached	Yes	No	Record Available At:	Warrant Date

5 Code Name	Sex	Race	D.O.B.	Age Range	Ht.	Wt.	Hair	Eyes	Net	Build	Corr. Lenses
Address		Phone	Social Sec. Number		Op. Lic. Number		State		Date O.L. Exp.		
Work Address		Work Phone		Occupation			Place of Birth				

Advised of Rights	Yes	No	By:	Date	Interviewed at:	By:	Date	Time

Charge, Suspected Of:	Booking Number	Criminal Record	Yes	No	Record Attached	Yes	No	Record Available At:	Warrant Date

6 Code Name	Sex	Race	D.O.B.	Age Range	Ht.	Wt.	Hair	Eyes	Net	Build	Corr. Lenses
Address		Phone	Social Sec. Number		Op. Lic. Number		State		Date O.L. Exp.		
Work Address		Work Phone		Occupation			Place of Birth				

Advised of Rights	Yes	No	By:	Date	Interviewed at:	By:	Date	Time
						MAY 3 1985		

Charge, Suspected Of:	Booking Number	Criminal Record	Yes	No	Record Attached	Yes	No	Record Available At:	Warrant Date
								APOC-ANCH	

7 Vehicle Information	Lic. Plate No.	Lic. State	Lic Exp Yr	Lic Plate Type	V.I.N. Number (Ser. No.)	Veh Yr	Make	Model	Style	Color

8 Vehicle Occupant Information	No. Pass	Male	Fem.	Evidence Found In Vehicle	Yes	No	By	Kind	Dispo of Evidence	Impound	At:
										Yes () No ()	

9 Weather Conditions	Fair	Clody	Rain	Snow	Temp Est.	10 Natural Light Cond.	D-lite	Dusk	Dark	M-lite	11 Art Light Conditions	Good	Fair	Poor	None	Type

12 Inside Light Conditions	Good	Fair	Poor	None	U/K	13 Type of Evidence	Retail	Whale	Liq Store	Whse	Const Sits	Bld. Supply	Other

14 Parking Facilities	Front	Side	Rear	Street	D/Way	Hidden	15 Type of Evidence	Front	Rear	Side	U/K	Other

16 Method of Entry	Describe						17 Type of Evidence	Front	Rear	Side	U/K	Other

124

525

APOC-AMOH
PM HC

MAY 21 1985

ARRIVED

8471	5
0607096A	•••••
0607096A	•••••
0607096	•••••
08 19 85	
M.O.A.	
UTILITIES	

A LITTLE MEMO FROM

W. L. H. in Adams

465 3771

Call Ketchikan 8:15

Anonymous message. AM
Thurs

Small Long Time Friend
of Jay from Wasilla
& I could afford to get
involved. I wrote

A LITTLE MEMO FROM

Jay to Krew

ACE

That sawheard a
contraction the other day
That the DB in
Palmer was 300
Questions about the
way Jay financed his
intell. That's all

ARRIVED

MAY 1955

AEGC-ANCH
PM (HC)

A LITTLE MEMO FROM

I Heard & I
Wanted Jay to watch
His Hand Bids, Sounds
like Somebody is trying
to get him out