



UNITED STATES DISTRICT COURT
FOR THE MIDDLE DISTRICT OF PENNSYLVANIA

Civil Action No.

M. REBECCA DOWNING and
ROBERT G. LEICHLITER,

Plaintiff,

- vs -

YORK COUNTY DISTRICT ATTORNEY,
H. STANLEY REBERT, and
YORK COUNTY, PENNSYLVANIA

Defendants.

30002624

Deposition Testimony of DOUGLAS DEMANGONE

225 Market Street
Harrisburg, PA

September 8, 2005
1:50 p.m.

IT IS HEREBY STIPULATED and agreed that the
reading, sealing, and signing of the within
transcript are waived;

IT IS FURTHER STIPULATED and agreed that all
objections except as to the form of the question
are reserved to the time of trial.

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COPY

1 A I can't give you the date, but it
2 would have been like bring your daughter to work
3 day or something, because we had a bunch of kids
4 in the office.

5 Q So you have a bunch of kids in the
6 office and you have this picture or photo of
7 Hilary Clinton.

8 Where is it displayed?

9 A It is in -- the chief asked me to
10 take the kids over to the crime lab. So I walked
11 them over there and we walked in, and there it is
12 on the wall, like next to the alarm panel.

13 Q Is that somewhat embarrassing, given
14 the fact the kids were coming in there?

15 A Yes, it was.

16 Q And what was derogatory about the
17 photo? How had it been altered?

18 A It had like Hilary Clinton's face
19 morphed on a topless female.

20 Q Did you speak to Chief Downing about
21 that?

22 A Chief Downing was present. I think
23 I pointed it out to her or something and like,
24 motioned to it and she ripped it down or covered
25 it up. I can't remember exactly what; but it was

1 on, like, a key rack, a wooden key rack thing
2 which was next to the alarm panel. My chest
3 height.

2:06P 4 Q Did Chief Downing indicate to you
5 that she was going to do anything about that
6 subject?

7 A She said she was going to talk to
8 Detective George about it, yeah.

9 Q Why was she going to be talking to
10 Detective George about it?

11 A Because he was in charge of the lab
12 at the time, and of team.

13 Q Was it ever determined who had put
14 the photograph up?

15 A Not that I am aware of, no.

16 Q Did Downing indicate that she was
17 going to speak to Stanley Rebert about the
18 subject?

19 A I know she told me she would talk to
20 him about it, yes.

21 Q Did she tell you that in that
22 conversation that Stan Rebert had made a comment
23 that Rodney George was a legend or something
24 along those lines?

25 A Yes, that was just Rodney or

1 something like that.

2:07P 2 Q Did she indicate to you that she was
3 not pleased with the response that she got from
4 Mr. Rebert to her bringing this issue to his
5 attention?

6 A Yes.

7 Q Based upon what Ms. Downing told
8 you, did you feel that that was an appropriate
9 reaction from the district attorney at the county
10 to being told about something like that?

11 A No, not under the circumstances.

12 Q Do you know if anyone spoke to
13 Detective George about the subject?

14 A Not that I am aware of.

2:08P 15 Q Do you remember after Becky Downing
16 became chief, her raising an issue with respect
17 to a Christmas party shuttle that would be done
18 by the detectives with respect to the Schaad
19 detective Christmas party?

20 A Yes.

21 Q What do you remember about that?

22 A That we were going to be taking
23 people from the office and running them over
24 there and picking them up and taking them back
25 and forth from the fairgrounds back to the

1 courthouse.

2 Q Which people would be picked up by
3 the detectives?

4 A Secretarial staff, attorneys,
5 everybody. That is what I understood.

6 Q Did that practice exist under Chief
7 Ingle when he was there?

8 A I know Chief Ingle would jockey
9 people back and forth. Me personally, no,
10 because I was assigned to the Drug Task Force
11 area. So we would all go out as -- you know, all
12 the detectives on the Task Force would go out at
13 the same time and then we would all ride back
14 together. That was pretty much commonplace for
15 the Drug Task Force guys at the time. We would
16 all go out to lunch together and then come back.

17 As far as running people back and
18 forth, I know that Mr. Ingle did that.

2:10P 19 Q Do you know if Chief Downing put a
20 stop to that practice after she came on board of
21 running people back and forth to that party?

22 A Um-hum.

23 Q Is that yes or no?

24 A Yes, sir.

25 Q And do you know if she spoke to

1 being, for lack of a better phrase, targeted.
2 Everything was being questioned. It was just
3 things were being said about me that I did not
4 appreciate. It was just a very stressful time
5 period for me between when she left and probably
6 a month and a half ago.

2:45P 7 Q Did you feel that if at that meeting
8 you expressed those views more forcefully with
9 respect to accreditation, you could have
10 increased the target that was on your back?

11 A I don't know if it would increase
12 the target, but I am establishing a relationship
13 with a new chief that I want to keep as a -- to
14 stay the course. And, you know, whatever he
15 wants, it is his agency. Mr. Rebert is
16 ultimately in charge, but he is in charge of us.
17 And if he wants us to go left or right, I am
18 going to go left or right, whatever he wants me
19 to do.

20 Q Is it fair to say you didn't want to
21 rock the boat?

22 A Exactly.

2:47P 23 Q Were you ever involved in purchasing
24 ammunition for a John W. Thompson, Sr.?

25 A Yes, I was.

1 Q Tell me about that.

2 A Oh, man.

3 Q By the way, who is he, first of all?

4 A He is something with the Republican
5 Committee down on Market Street, West Market
6 Street.

7 Q Okay.

8 A I am trying to remember. Tom
9 Kelley -- they brought a gun in and I had to
10 figure out what kind of caliber it was. And then
11 I went and bought the ammunition for it and took
12 it to Mr. Thompson. And then I gave the receipt
13 for the ammunition to Tom Kelley.

14 Q Who brought the gun to you?

15 A Oh, man. I don't remember who that
16 was. I just remember getting it. It was an
17 old -- I want to say it looked like a 32
18 automatic, if I remember correctly. Like a
19 Walter PBK kind of thing. It wasn't a Walter
20 PBK. It was some other German pistol or
21 something. I ended up going and getting
22 ammunition for it. I don't remember where I got
23 the ammunition, but I remember buying it. It
24 might have been Gander Mountain. I don't even
25 know if Gander Mountain was even open then.

2:48P 1 Q Did someone in the District
2 Attorney's Office request that you do this?

3 A Um-hum.

4 Q Is that yes?

5 A Yes, sir.

6 Q Do you know who it was?

7 A I believe it was Tom Kelley.

8 Q Did Mr. Kelley indicate why the
9 District Attorney's Office or the detectives
10 would be buying ammunition for Mr. Thompson's
11 weapon?

12 A Something about he wanted to keep
13 the gun in his office and needed ammunition for
14 it, but didn't know what kind of ammunition he
15 needed. So he brought the gun in and hoped that
16 we could figure it out for him. Something along
17 those lines.

18 Q Was that during Chief Downing's
19 tenure or was it before Chief Downing's tenure?

20 A I don't even remember. I don't
21 know. It was, like, a one day thing. I just
22 remember getting the gun and going and getting
23 the stuff.

24 Q Did you pay for the ammunition
25 yourself?

1 A Um-hum.

2 Q Is that a yes?

3 A Yes, sir.

4 Q Did you ever get reimbursed for
5 that?

2:49P 6 A I think I did. I might not have. I
7 don't know. I think I did.

8 Q Did you deliver the weapon and the
9 ammunition to Mr. Thompson?

10 A Yes, I did.

11 Q Did you have any discussion with him
12 as to why your office was involved in buying
13 ammunition for a private citizen and his weapon?

14 A No. I just remember going up the
15 steps and down the hallway and he was in his
16 office and he said, Hey, thanks.

17 Q If I brought my weapon in to the
18 detectives, would they buy me ammunition?

19 A No.

20 Q Do you know why it was that Mr.
21 Thompson was able to get ammunition purchased for
22 him?

23 A No. He was with the Republican
24 party. And I was, you know, told to do
25 something. so I did it.

1 Q Does that entitle you to free
2 ammunition from the Detective Bureau?

3 A You mean -- what do you mean free
4 ammunition?

5 MR. LEBER: I object to the form.

6 Q Well, does being involved in the
7 Republican party entitle you to have a detective
8 go out and buy you ammunition for your personal
9 weapon?

10 A No.

11 Q Did you question either Mr. Kelley,
12 now Judge Kelley, about that or anybody else in
13 the office about why you would be doing something
14 like that?

15 A No, I don't think I did. I just did
16 it.

17 Q Does the head of the Democratic
18 party get ammunition bought for him?

19 A I have never bought any ammunition.

20 Q Do you know anything about any of
21 the detectives taking a television to Stanley
22 Rebert's house?

23 A I remember people talking about it.

24 Q Were you involved in that?

25 A No. I think I was in polygraph

1 Q Did you speak to Detective James
2 about it?

3 A I am sure I did. I mean, we talk
4 about everything all of the time.

5 Q It is typical cops?

6 A Just cops talking back and forth.

7 You know, where are you going, we have to this or
8 do that.

9 Q Was it your understanding that that
10 was done during work hours?

11 A Um-hum. Yes.

12 Q Was there any indication given to
13 you that a slot machine was removed from Mr.
14 Rebert's house during the same trip?

15 A Yes.

16 Q What were you told about that?

17 A Just that it had been moved. And it
18 was in his office, moved to his office.

19 Q Moved from his house to his office?

20 A Um-hum.

21 Q Is that yes?

22 A Yes, sir.

23 Q Was that a one-armed bandit or a
24 poker machine? That came up in Mr. Glowczewski's
25 deposition. Did they say whether or not it was a

1 school.

2 Q Did that occur under Ms. Downing's
3 tenure?

4 A Yes.

5 Q Do you recall who was talking about
6 bringing the TV to Mr. Rebert's house?

7 A I think it was James and Tony. I
8 think it was James and Tony.

9 Q Did anybody -- go ahead. I'm
10 sorry.

11 A Maybe Matt. I don't know. I just
12 know that there were a couple guys.

13 Q Is Matt, Matt Millsaps?

14 A Yes.

15 Q Was it ever explained to you why
16 detectives would be taking a TV to Mr. Rebert's
17 house?

18 A No, I don't think it was. I think
19 it was it just needed to be moved or something,
20 so they moved it.

21 Q Was it a new TV, a used TV?

22 A That I don't know.

23 Q You were just told about it
24 afterwards?

25 A Yes.

1 one-armed bandit or a poker machine?

2 A I think it was a slot machine, a
3 one-armed bandit slot machine.

4 Q Do you know if Chief Downing was
5 made aware of the detectives allegedly having
6 taken the TV to Mr. Rebert's house and retrieving
7 the slot machine?

8 A Yes.

9 Q Did she discuss that with you?

10 A I am sure she did.

11 Q Did she indicate her views on that
12 subject?

13 A We ultimately destroyed the slot
14 machine.

15 Q Did she indicate that she was going
16 to speak to Mr. Rebert about that?

17 A Yes.

18 Q Do you know if she did?

19 A Yes.

20 Q And the ultimate result was?

21 A We destroyed the slot machine.

22 Q You destroyed Stan's slot machine?

23 A Yes, sir.

24 Q Was he unhappy about that?

25 A Yes, he was.

1 Q How did he express that unhappiness?

2 A I remember something about he likes
3 the kids coming in and they play with it putting
4 quarters in it or something and pulling the
5 slots. It wasn't quarters. It was like, tokens
6 or whatever.

7 Q So he wasn't too pleased that he
8 lost his office machine?

9 A No.

2:55P 10 Q What was the standard procedure with
11 items such as that, slot machines at that time
12 that are seized in raids or however they are
13 acquired?

14 A Well, we never really acquired them.
15 They usually came through with the LCB. The LCB,
16 when they would raid a bar or whatever, they
17 would take them.

18 I know that Chief Ingle -- well,
19 this is through Detective Martz, that he'd gotten
20 one out at the fairgrounds at some point in time.
21 I don't know when. I don't recall seeing it,
22 whether Kenny told him he got one out there or
23 Martz was with him when he did it.

24 But I remember he said Kenny would
25 take a quarter and he would put it in each slot

1 machine and pull it and if it kept the quarter,
2 then Kenny would take the slot machine, because
3 they were only supposed to operate on tokens.
4 But if it took the quarter, then he would take
5 the machine. So that's what I heard.

6 Q And Detective Martz told you that?

7 A Yes, sir.

8 Q All right.

9 A So I don't know if that is where
10 that slot machine came from or not. I have no
11 idea.

12 Q In terms of standard procedure, if
13 Mr. Ingle did take a slot machine from the fair,
14 what was supposed to be done with it?

2:56P 15 A Just destroyed.

16 Q Do you have one in your office?

17 A Do I?

18 Q Yes.

19 A No.

20 Q Does anybody else have one down
21 there in their offices?

22 A No.

23 Q Do you know if Mr. Ingle had one in
24 his office down there?

25 A I think he might have. I am not 100

1 percent sure. He had, like, candies and a
2 refrigerator and all kinds of stuff in there. I
3 am trying to remember if he had a slot machine in
4 there or not.

5 Q Other than Mr. Ingle possibly and
6 Mr. Rebert, do you know of any other York County
7 officials who had slot machines in their offices?

8 A There was a poker machine out in the
9 old lab, in the squirrel hut as they called it.
10 I don't know where that came from.

11 Q Do you know if it came out of Mr.
12 Rebert's office?

13 A No, I don't think it was ever in
14 Stan's office.

15 Q Was there ever a poker machine in
16 Mr. Rebert's office that you know of?

17 A Not that I'm aware of, no. As I
18 said, I have no idea where that thing came from.
19 I have no idea.

20 Q Are you aware of any of the
21 detectives being asked to run personal errands
22 for Stanley Rebert?

2:57P 23 A Yeah.

24 Q Tell me what you know about that.

25 A Ken Ingle would go to get family and

1 friends from the airport and that kind of stuff,
2 pick people up and take them to and from places.

3 Q On county time he would do that?

4 A Um-hum.

5 Q Is that yes?

6 A Yes, sir.

7 Q Did you think that was appropriate?

8 A No.

9 Q Did anybody ever go to Mr. Rebert
10 before Ms. Downing and say, Hey, you shouldn't be
11 doing those things?

12 A I never did.

13 Q Do you know if anyone else ever did?

14 A Not that I am aware of.

15 Q Do you know if Mr. Ingle or any of
16 the detectives were ever asked to shovel Mr.
17 Rebert's snow.

18 A I am not aware of that.

19 Q How about asked to feed his dog
20 while he was away?

21 A Yes.

22 Q Tell me about that.

23 A I am pretty sure Chief Downing did.

2:58P 24 Q Do you know if he asked Chief
25 Downing to feed his dog?

1 A I am pretty sure.
2 Q Did she tell you that?
3 A Yes.
4 Q Do you know if she did it on county
5 time or after work?
6 A That I don't know.
7 Q Do you know if she had to go buy a
8 bag of dog food?
9 A Yes, I know that she had to buy a
10 bag of dog food at Sam's. I don't know what
11 kind, but I just remember she had to buy a bag of
12 dog food.
13 Q Did she discuss whether she thought
14 that was an appropriate thing for Mr. Rebert to
15 ask her to do as the chief county detective?
16 A I remember she was pissed -- oh,
17 pardon me. She was upset with having to do
18 that.
19 Q Did she say she was going to speak
20 to Mr. Rebert about that subject?
21 A That I don't recall.
22 Q Do you know if any of the detectives
23 ever drove Stanley Rebert around to work the
24 poles during election days?
25 A I never did.

1 Q I am not saying you did. Do you
2 know if anyone else ever did?
3 A I don't know if Mr. Ingle did or
4 not. I don't know.
5 Q Does that sound like something that
6 would be in character for Mr. Ingle to do?
7 A Yes.
8 Q Do you remember Mr. Ingle being
9 charged criminally with respect to things that
10 he did during his tenure as chief county
11 detective?
12 A Yes.
13 Q What was he alleged to have done and
14 what was he ultimately convicted of?
15 A It was alleged that he had stolen
16 property from the D.A.'s office; guns, firearms,
17 weapons, specifically a Browning high powered
18 semiautomatic pistol. And the state police
19 ultimately found that gun, along with numerous
20 other guns and a megaphone and a laptop computer
21 and radios and crime scene tape and badges and
22 you name it, he had it.
23 I mean, he even had Detective
24 George's radio that he wrote him up for. He had
25 my cell phone from when I was with auto theft

1 that had the auto theft logo there that said
2 where is your car. And he found it and we called
3 it and it still was activated when it was
4 supposed to be turned in a year prior to that and
5 shut off. He had all kinds of stuff.
3:01P 6 Q Do you know what he was actually
7 charged with? Was he charged with all the stuff
8 or was he just charged with guns?
9 A He was charged with the guns.
10 Q Do you know why he wasn't charged
11 with taking all the other stuff as well, like the
12 thing he wrote you up for?
13 A He wrote Detective George up.
14 Q Oh, I'm sorry. He wrote Detective
15 George up for?
16 A Mr. Rebert didn't want it done.
17 Q How do you know that?
18 A He said it.
19 Q Were you there when he said it?
20 A Yes.
21 Q In what context did he say it?
22 A We were in Chief Downing's office.
23 It was myself, Mr. Rebert, Chief Downing,
24 Lieutenant Glowczewski, and Eric Augustine from
25 the AG's office. We were discussing it -- no.

1 That was a different conversation. I wasn't
2 there for that. That was a different
3 conversation.
4 We were talking about something and
5 Mr. Rebert looked up and said, Well, maybe we
6 ought to get that couch out of my house.
7 Q Oh, I'm going to get to that
8 meeting.
9 A Okay. This would have been before
10 there, but I don't think I was there for that.
3:02P 11 Q Did someone tell you that Mr. Rebert
12 didn't want him prosecuted?
13 A Yes.
14 Q Was that Chief Downing?
15 A Yes.
16 Q Did Chief Downing tell you that she
17 had recommended to Mr. Rebert that Mr. Ingle
18 should be charged with all of the things that he
19 stole and not just the guns?
20 A Yes.
21 Q Let's talk about the meeting with
22 the couch. Was that right before Mr. Ingle's
23 trial?
24 A Yes, that would have been, like, the
25 morning of, because we had to make the big

1 display for Augustine.

2 Q Where was the group at?

3 A Chief Downing's office.

4 Q Who was present in the office at the
5 time?

6 A Me, Chief Downing, Lieutenant
7 Glowczewski, Eric Augustine. And I don't know if
8 there was anyone else. I don't think there was
9 anybody else there.

3:03P 10 I just remember I was standing in
11 the doorway. Mr. Rebert was in front of me.
12 Eric Augustine was to my left. The lieutenant
13 was over here and chief was at her desk. And
14 there might have been someone behind me or off to
15 the far left, but I don't remember.

16 Q And what was being discussed at the
17 time?

18 A Trial strategy.

19 Q Did Mr. Rebert come into the room?

20 A Yes.

21 Q What happened after Mr. Rebert came
22 into the room?

23 A We were talking about something. I
24 just remember him looking up. He was sitting on
25 the corner of -- leaning up against the credenza

1 something along those lines. I can't remember
2 specifically; but it was something like, You got
3 to do it. And she was like, No, we're not going
4 to do that. You take care of it. I am not going
5 to involve my guys, or something along those
6 lines.

7 Q And that was said in front of Mr.
8 Rebert at the meeting?

9 A Um-hum.

10 Q Is that yes?

11 A Yes, sir. I'm sorry.

12 That was me, Eric Augustine, Stan,
13 Lieutenant, and Chief Downing.

3:05P 14 Q Eric Augustine, he was the guy from
15 the AG's office. Right?

16 A That's correct.

17 Q He actually tried the case?

18 A Yes, sir.

19 Q How did the trial go?

20 A It went very well.

21 Q Was Mr. Augustine happy with the
22 results?

23 A Yes, he was.

24 Q Were you happy with the results?

25 A Yes, I was.

1 kind of thing and he looked up and said, We need
2 to -- we got to get that couch out of my house.
3 Something along those lines.

4 Q Do you know what context, I mean,
5 what was going on in the discussion in the room?

6 A We were talking about property,
7 county property.

8 Q Stolen county property?

9 A Right.

10 Q And Mr. Rebert said we have got to
11 get that couch out of my basement?

3:04P 12 A I don't know if he said basement. I
13 think he said house.

14 Q Out of his house?

15 A Yes.

16 Q Did he ask the detectives to
17 actually go do that, or did he just say we got to
18 get it out?

19 A I don't know what was said after
20 that. I just remember it being said. Then it
21 was like, get it out. And I am pretty sure the
22 chief said, No, we are not going to do that.

23 Q Chief Downing?

24 A Yes. You need to get somebody else
25 to do it. We are not going to do it. or

1 Q Why were you happy with the results?

2 A Because he was a police officer that
3 stole. He gave us a bad image.

4 Q Was Mr. Rebert happy with the
5 results?

6 A Yes, and no.

7 Q Explain that.

8 A He was happy that there was a
9 conviction. And then later on there was some
10 strife in the office between Paul Crouse and
11 Susan Voyzey. I just remember something about
12 Ken Ingle and the chief being criticized for it
13 or something along those lines.

3:07P 14 Q Was there ever an indication that
15 Ingle was romantically involved with Susan
16 Voyzey?

17 A There were rumors, yeah. Nothing
18 that, you know, I had any firsthand knowledge of.
19 I probably had 30-hand knowledge of it.

20 Q Were they pretty friendly based upon
21 what you could see?

22 A Um-hum.

23 Q Is that yes?

24 A Yes, sir.

25 Q After the conviction was there any

1 Q Yes.

2 A I know she hated them.

3 Q But did you ever know her not to go
4 to them?

5 A If she wasn't in the office, yeah.

6 Q Do you know if she was somewhere
7 else doing some other type of business when they
8 were taking place?

9 What I'm talking about is do you
10 ever know of her intentionally blowing off a
11 meeting when she didn't have something else to do
12 or wasn't engaged in some other law enforcement
13 business?

14 A I can't answer that question. I
15 mean, if she wasn't in the office, she would tell
16 one of us, I am running here or I gotta go there;
17 but I don't know if she ever intentionally did.

18 MR. LAVERY: I'm just about
19 finished. Let me talk to my client for a
20 second. Let me take a few minutes.

21 (Brief recess.)

22 BY MR. LAVERY:

23 Q With respect to Mr. Daryman when he
24 was hired, were you there during his
25 orientation?

4-06P

1 And subsequently after that,
2 apparently he changed his schedule without
3 telling anybody and he got reprimanded and then
4 he was removed from our chain of command.

5 Q Did he do anything with the rules
6 and regulations book? Did he throw it down or
7 throw it at you or anything like that?

8 A We were sitting in the Chief's
9 office right across from her desk and he just,
10 like, slammed it down on the front of her desk.

11 Q Do you know if the fact that he said
12 he was going to violate half of the rules in the
13 rules and regulations book was reported to
14 Stanley Rebert by anyone?

15 A The Chief was in the room.

16 Q Did she indicate whether or not she
17 was going to report that to Mr. Rebert?

18 A I know both her and I talked to John
19 about learning the rules, take them or leave
20 them. That is the way it is. You are a York
21 County detective. These are the rules.

22 Whether or not she went to Mr.
23 Rebert, I would not have been in that meeting, so
24 I don't know whether she told him or not. I
25 would assume she did.

1 A I did his orientation.

2 Q Did anything unusual occur at that
3 orientation?

4 A What we did in our orientation is we
5 would go over each rule and regulation with each
6 detective as they are hired. And I was reading
7 him the rules and regs and he says, You don't
8 need to read these to me. I'll just take the
9 book. And I said, No, Chief wants me to read
10 them to you so you understand each one so that
11 there is no questions.

12 And he says to me, Well, I am going
13 to violate half of these. And I said, Well, if
14 you violate them, you will suffer the
15 consequences. And he says, Well, I am going to
16 violate half of them. And I said, Well, which
17 ones? He says, Well, like this chain of command
18 thing. Do you think I am going to take an order
19 from Millsaps? And I looked at him and said,
20 Well, John, do you think Millsaps is going to
21 give you an order? And he says, Well, I am just
22 telling you, I am going to violate half of these.
23 And I said, Fine, then you are going to suffer
24 the consequences. And we continued through the
25 book.

4-07P

1 Q Did you feel Mr. Daryman was acting
2 appropriately at that time?

3 A No.

4 Q Had you ever had anybody else who
5 has been hired say they are going to violate half
6 of the rules in the book?

7 A No.

8 Q Do you think if it was anybody else
9 other than Mr. Daryman, do you think they would
10 have been hired after saying that?

11 A No.

12 MR. LAVERY: Those are all the
13 questions I have. Thank you.

14

15 EXAMINATION BY MR. LEBER:

16 Q Detective, how do you rate Mr.
17 Daryman as a detective?

18 A I can only rate John on what I heard
19 because I have never really worked with him on
20 anything.

21 Q Okay.

22 A But from what I heard, he is
23 excellent; but I have never had the opportunity
24 to work with him to know that. I know he is
25 respected. but I never had the opportunity to