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1 A I think so.
 2 Q And do you have any problem or
 3 question in regard to those instructions?
 4 A No.
 5 Q Okay. Are you suffering from any
 6 disability which would prevent you from hearing
 7 or understanding or responding to my questions
 8 today?
 9 A No.
 10 Q To prepare for today's deposition did
 11 you review any documents?
 12 A No.
 13 Q Now, again, you are under oath. You
 14 did take an oath to tell the truth. I just
 15 remind you, of course, that--I don't think I
 16 need to tell you, you're married to the district
 17 attorney--obviously, perjury is --
 18 A A crime.
 19 Q -- a criminal offense and you're well
 20 aware of that, so you are obligated to tell the
 21 truth.
 22 Going back to a period of time when
 23 Miss Downing was employed at the district
 24 attorney's office, did you ever own a Mazda
 25 Miata-type vehicle?

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1 A I still do.
 2 Q And at any time did you ever ask that
 3 Miss Downing or ask for Randy Rizzuto to have
 4 Miss Downing come out to your house to assist
 5 you with starting your vehicle?
 6 A I don't remember, but it would be
 7 very likely.
 8 Q Okay. Does the Mazda have problems?
 9 A There was a time, yes.
 10 Q Do you remember what period of time
 11 we're talking about?
 12 A No, I have no idea. I don't even
 13 remember it happening. I'm just saying that
 14 that's very possible.
 15 Q Fair enough. When you say that it's
 16 possible, what is it that makes you believe it's
 17 possible? Would that have been something that
 18 you would have done?
 19 A Well, we were friends. And, you
 20 know, lots of times Becky or Bob would say -- or
 21 Becky would say, Bob can come and help, you
 22 know.
 23 Q Okay. Did any of these occasions --
 24 If you recall, would any of these occasions
 25 occur during the normal business hours?

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1 A Not that I remember, no.
 2 Q Did Miss Downing ever come out to
 3 your home to check or fix your personal
 4 computer?
 5 A Bob and Becky set it up when we got
 6 it.
 7 Q Okay. Once the computer was set up,
 8 was there ever an occasion where either you
 9 requested or Mr. Rebert had Miss Downing stop
 10 out at your house to fix or check on the
 11 computer?
 12 A I'm sure I called her. I had a lot
 13 of problems. You know, I'm not real computer
 14 literate, and Becky is the one that helped me,
 15 Becky and Bob.
 16 Q Okay. And were any of those
 17 occasions during normal working hours?
 18 A No, because I work full time.
 19 Q Where do you work?
 20 A Crispus Attucks.
 21 Q Just so we're clear on the record,
 22 what is Crispus Attucks?
 23 A It's a community center where I work
 24 at the charter school that's for at-risk
 25 students that have dropped out of school and

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1 have been in trouble with the system. We get
 2 them their diploma and teach them a trade.
 3 Q While you may not have personally
 4 made the request, are you aware of any time when
 5 Miss Downing was at your residence during normal
 6 working hours to either work on the computer or
 7 to work on your vehicle?
 8 A No, I'm not aware of that.
 9 Q Do you know if Miss Downing ever
 10 purchased dog food for your family?
 11 A Not that I'm aware of.
 12 Q Do you remember an occasion when you
 13 may have been out of town or out of the state
 14 where -- Is it Beezy?
 15 A Um-hm.
 16 Q -- where Beezy was supposed to feed
 17 the dogs?
 18 A Yeah.
 19 Q And did you ever forget or did Mr.
 20 Rebert ever forget to leave dog food for Beezy
 21 to feed the dogs?
 22 A I don't remember.
 23 Q Did you ever ask Miss Downing to
 24 provide you with some sort of badge from the
 25 district attorney's office?

1 A Yes.
 2 Q And can you explain for what purpose
 3 you needed the badge?
 4 A It's kind of -- Do you want to hear
 5 the whole story?
 6 Q Yes, I do.
 7 A Okay. At one point--I think that was
 8 before Becky came to work at the office--a
 9 friend of ours who has a scrap metal business
 10 volunteered a crane he had because the police
 11 thought there was a -- the murder weapon in the
 12 Codorus Creek. They drug the creek for this
 13 weapon.
 14 A couple months later his wife was
 15 having a surprise birthday party for him and she
 16 asked me if -- She said, wouldn't it be fun if
 17 we could get him a badge. It said something
 18 like special -- It wasn't -- I didn't think it
 19 was a real badge. We were the way they got him
 20 to the surprise birthday party. Stan was
 21 presenting him with this thing.
 22 So, I saw that guy years later,
 23 several years later and he said he had a
 24 dentist. I do, I try everything I can to get
 25 the students I work with any kind of help I can.

1 A Not that specific date. If I
 2 specifically said something to a reporter, no, I
 3 don't remember that.
 4 Q Do you remember making any statements
 5 to any reporters in regard to the subject matter
 6 of this lawsuit?
 7 A Yes.
 8 Q And what statement do you recall
 9 making?
 10 A I recall, I think I said that I was
 11 really sadden by what had happened because I
 12 really lobbied for Becky. I really wanted Stan
 13 to hire her.
 14 Q Do you recall being asked questions
 15 about the Crispus Attucks Youth Build Charter
 16 School?
 17 A By the paper?
 18 Q Yes.
 19 A That had to do with Becky?
 20 Q Yes.
 21 A No.
 22 Q Do you recall being asked about the
 23 badge that you requested for the dentist?
 24 A By the paper?
 25 Q Yes.

1 He said, hey, if you can get him a badge, he'll
 2 work on your kid's teeth for nothing. So I went
 3 and asked Becky. I didn't ask Stan. I went
 4 right to Becky right in front of everybody, and
 5 Becky said no, we don't do that. You shouldn't
 6 have done that in the first place. I remember
 7 saying, don't tell Stan then because I didn't
 8 realize I was out of line.
 9 Q Okay. An individual you were
 10 referring to earlier, that was Phil Serls; is
 11 that correct?
 12 A Yes.
 13 Q The badge that Mr. Serls eventually
 14 possessed, do you know what happened to that
 15 badge?
 16 A No, I have no idea. He and his wife
 17 got divorced so we kind of lost track.
 18 Q Fair enough. Do you recall making a
 19 statement to the York Daily Record in November
 20 of 2005?
 21 A Do I -- I don't know.
 22 Q You don't know if you remember?
 23 A I mean, if I did, I did.
 24 Q I'm just asking, do you remember if
 25 you did?

1 A No.
 2 Q And do you recall making a statement
 3 that you have answers for that allegation, but
 4 that you would give it at a later time?
 5 A Yes, you're right, I did do that.
 6 Q So the answer that you just provided,
 7 the explanation --
 8 A Was the answer.
 9 Q Is that the answer?
 10 A Yes.
 11 Q Who is Stacey Shillito?
 12 A I don't know.
 13 Q Do you know the owners of, is it
 14 Murph's Study Hall?
 15 A Um-hm.
 16 Q Did they have somebody in their
 17 employ by the name of Stacey Shillito?
 18 A Yeah, there's a bartender.
 19 Q And how do you know Stacey Shillito?
 20 A We had our Christmas parties there
 21 and she usually was the bartender.
 22 Q Okay. Do you recall at any point
 23 Miss Shillito being arrested for DUI?
 24 A Not that I'm aware of.
 25 Q Do you know if Mr. Rebert ever

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1 attempted to get information about Miss Shillito
 2 in regard to the DUI?
 3 A Not that I'm aware of.
 4 Q Did you ever -- Were you ever
 5 requested by anybody at -- It is Murph's, right?
 6 A Murph's, yes.
 7 Q -- at Murph's to find out information
 8 about Miss Shillito?
 9 A No.
 10 Q Did Miss Shillito ever contact you in
 11 regard to her arrest?
 12 A No. I don't know her very well. I
 13 didn't even know that was her name.
 14 Q Do you know if Susan Voyzey goes to
 15 Murph's?
 16 A Do I know if she goes to Murph's?
 17 No. She's at the Christmas party. That's the
 18 only time I'm ever there.
 19 Q Do you know if Mr. Rebert ever asked
 20 Miss Downing to get information about Miss
 21 Shillito?
 22 A I don't know.
 23 Q Do you know a Natasha Stowe?
 24 A No.
 25 Q Do you know a Jared Loker?

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1 A Jared Loker, yes.
 2 Q How do you know Mr. Loker?
 3 A He was one of our students.
 4 Q Students where?
 5 A At Crispus Attucks Youth Build
 6 Charter School where I worked.
 7 Q And were you close with Mr. Loker?
 8 A He was one of the students.
 9 Q Okay. Do you know if at any time Mr.
 10 Loker was ever arrested for any crimes?
 11 A Yes.
 12 Q And what was he arrested for?
 13 A You know, several things. I don't
 14 know -- He was in the program because he was in
 15 trouble with the law.
 16 Q Okay. Was he ever arrested for
 17 stealing a bike?
 18 A Not that I can remember.
 19 Q Were you ever asked by Mr. Loker or
 20 anyone in his family to try to intervene in
 21 regard to his criminal charges?
 22 A No.
 23 Q Do you know if any request was ever
 24 made of Stan to try to intervene in Mr. Loker's
 25 criminal charges?

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1 A No.
 2 Q Do you know a person by the name of
 3 Dan Delp?
 4 A Yeah.
 5 Q How do you know Mr. Delp?
 6 A I worked for him when he was state
 7 senator.
 8 Q Do you know if Mr. Rebert ever
 9 attempted to provide or to get information for
 10 either Chris Reilly or Dan Delp? And when I say
 11 information, I mean vehicle registration
 12 information or criminal history-type
 13 information.
 14 A No, not that I'm aware of.
 15 Q Were you ever asked by either of
 16 those individuals for that type of information?
 17 A No.
 18 Q And were you working for Mr. Delp at
 19 the time when he was implicated in a --
 20 A Yes.
 21 Q -- prostitution scandal?
 22 A Yes.
 23 Q Sometime during the years 2000 and
 24 2004, did you, yourself, possess a cell phone?
 25 A Yes.

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1 Q And what company did you use for your
 2 cell phone service?
 3 A I have no idea.
 4 Q Do you know the type of phone that
 5 you possessed?
 6 A No.
 7 Q Is this a phone that you used
 8 regularly?
 9 A I'm very opposed to cell phones. I
 10 have one, and I carry it in my car and that's
 11 it.
 12 Q Do you have a cell phone right now?
 13 A Yes. I brought it because I know it
 14 was a topic of --
 15 Q Fair enough. Who is your cell phone
 16 through right now?
 17 A I don't know.
 18 Q Is it a Nextel cell phone?
 19 A I don't know.
 20 Q During 2000 and 2004, did you possess
 21 a Nextel cell phone?
 22 A I'm not sure what kind it is.
 23 Q Do you know what your phone number
 24 was during the years 2000 and 2004?
 25 A No.

1 Q Is it the same phone number that you
2 have now?

3 A I don't know.

4 Q Does it refresh your recollection if
5 I give you the number? I'll give you two
6 different numbers and you can pick which one is
7 yours, 717-577-3189?

8 A I don't know the number.

9 Q How about 717-577-9151?

10 A I don't know.

11 Q You don't know if that was your
12 number? Did you ever know that? Is it just
13 something you forgot?

14 A No. I never gave out my number
15 because the phone was only used when I needed to
16 get in touch with Stan.

17 Q So then, is it possible that one of
18 those phone numbers is yours, you just don't
19 remember --

20 A Oh, that's very possible, yes.

21 Q We can't step on each other here as
22 far as the transcript. I have to let you finish
23 your thought, you have to let me finish.

24 A I'm sorry.

25 Q I do it too, so I apologize. But

1 about that; that you were using a drug task
2 force phone and not being an employee of the
3 D.A.'s office?

4 A Well, no, because I didn't use it for
5 my personal use. It was for my way to get in
6 touch with Stan or if he didn't have his cell
7 phone and we were in one of our cars, that he
8 would have access to a car (sic). If you're
9 aware, he has multiple sclerosis and --

10 Q Right.

11 A -- he's had some pretty nasty falls.
12 It was my means to check up on him. But I never
13 used it for anything else.

14 Q Okay.

15 A You can check that.

16 Q We will. How often do you believe
17 that you used this cell phone?

18 A Probably two or three times every six
19 months.

20 Q Okay. Now, you were never employed
21 by the district attorney's office yourself; is
22 that correct?

23 A No, I never was.

24 Q And the purpose for you having that
25 phone was for you to contact your husband; is

1 just so the record is clear now, I'm just going
2 to ask the question again. So it is possible as
3 you sit here today, that one of those two
4 telephone numbers mentioned was a phone number
5 assigned to you that you used, but you just
6 don't recall it as you sit here today?

7 A Yes.

8 Q Do you know how the cell phone that
9 you did possess was paid for during that time?

10 A No.

11 Q Do you know whether, for instance, it
12 was the Rebert family's personal money that paid
13 for the cell phone?

14 A My assumption is that it was from the
15 drug task force.

16 Q Okay. Why is it your assumption?

17 A Because they confiscate a lot of
18 phones.

19 Q Okay. So the cell phone that you
20 used then for your personal use was paid for by
21 the drug task force funds?

22 A I can't say that for sure.

23 Q But that's your assumption?

24 A That would be my assumption.

25 Q Okay. Did you find anything strange

1 that correct?

2 A Yes, or for him to use it.

3 Q But he had his own cell phone; is
4 that correct?

5 A Yeah, but if for some reason he
6 didn't have it.

7 Q Do you recall asking Bob Leichter
8 how to use the phone?

9 A I probably did. I asked a lot of
10 people how to use it.

11 Q And do you recall making a statement
12 to Bob that this was a county phone and that
13 Stan got it for you?

14 A No, I don't remember saying that.

15 Q Do you recall making a statement that
16 you didn't like the phone that you had because
17 it was harder to operate than any previous phone
18 that you had?

19 A No, I don't remember saying that.

20 Q Did you ever misdial the telephone
21 and end up getting Becky Downing?

22 A Not that I'm aware of. I remember
23 getting a police officer once. It wasn't Becky.

24 Q So at times did you call from the
25 phone that you had to Stan's phone?

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1 A Yes, I'm sure I did.
 2 Q Do you recall ever loaning the
 3 telephone that you had to one of the Youth Build
 4 kids and the phone being stolen?
 5 A No, I never lent the phone to
 6 anybody.
 7 Q So you never gave the phone to --
 8 A I had a phone stolen.
 9 Q Okay.
 10 A But I didn't give it to anybody. It
 11 was stolen out of my car.
 12 Q Fair enough. Can you explain that
 13 situation?
 14 A The phone was in my car, and when I
 15 came out it wasn't.
 16 Q And which phone was that? Was that
 17 the county phone?
 18 A It was the only phone I've ever had.
 19 You know, it was the only source I ever got a
 20 phone from.
 21 Q How many phones did you have during
 22 that period of time, if you recall?
 23 A I think two. I had the one stolen
 24 and then I got another one.
 25 Q And both of those phones do you

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1 believe were paid for through the drug task
 2 force?
 3 A Yes.
 4 Q And when we say drug task force,
 5 we're talking about the York County Drug Task
 6 Force?
 7 A Yes.
 8 Q And that would be administered by the
 9 D.A.'s office, if you know?
 10 A Bill Graff.
 11 Q Okay. Is that a yes?
 12 A Yes.
 13 Q Did Bill Graff know that you had this
 14 phone?
 15 A Yes.
 16 Q And how do you know that he knew
 17 that?
 18 A I don't know. I mean, I talk to
 19 Bill. I don't know.
 20 Q Okay.
 21 A I mean, because he's part of the task
 22 force. I think Bill was the one that got me the
 23 phones.
 24 Q At any point in time did you ever
 25 have to turn back in your county phone and get

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1 service elsewhere?
 2 A Not that I remember.
 3 Q After this lawsuit was filed, was the
 4 service cut off on the phone that you possessed
 5 and didn't you get a new cell phone?
 6 A I got a new cell phone. I don't --
 7 Q Did it happen in the last year?
 8 A I'm not sure.
 9 Q Wasn't it because the phone was being
 10 paid for by county funds and, in fact, it needed
 11 to be paid for by personal funds?
 12 A I'm not aware. Stan gives me the
 13 phone. That's all I know.
 14 Q You never asked the question why your
 15 phone was being switched?
 16 A No. I thought I was getting an
 17 updated phone.
 18 Q Did you get an upgraded phone?
 19 A I don't know enough about them to
 20 tell you. I know I can't work it.
 21 Q Do you have any phone records in
 22 regard to the telephone numbers that you may or
 23 may not have dialed from any of the phones that
 24 you possessed during 2000 and 2004?
 25 A No.

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1 Q Did you ever question Stan why you
 2 had a phone from the county?
 3 A No.
 4 Q What was the earliest point in time
 5 when you believe that you knew that the phone
 6 was being paid for by the drug task force funds,
 7 if you knew?
 8 A I don't know.
 9 Q But at some point in time the phone
 10 that was being paid for by the county was taken
 11 from you; is that correct?
 12 A I don't remember that at all, no. I
 13 don't remember anybody ever taking a phone from
 14 me.
 15 Q So then, you still have it?
 16 A Yes.
 17 Q You still have the phone from the
 18 county?
 19 A I have a phone.
 20 Q I'm asking, is the phone being paid
 21 for by the county?
 22 A I don't know.
 23 Q So you don't know where your present
 24 phone is being paid for?
 25 A Correct.

1 Q Would you be willing to turn over any
 2 documents related to your personal phone?
 3 A Yes.
 4 (Cell phone interruption.)
 5 BY MR. JACOB:
 6 Q Did you ever type or prepare campaign
 7 letters or brochures for your husband?
 8 A No.
 9 Q Okay. Were you involved at all in
 10 his re-election campaign as far as the
 11 preparation of documents or anything of that
 12 nature?
 13 A No.
 14 Q Do you ever recall asking Bob
 15 Leichliter to assist you with buying a new
 16 computer for your home?
 17 A Yes.
 18 Q And what was the purpose for that
 19 computer?
 20 A I think it was for the campaign.
 21 Q For the campaign. Was this during
 22 the tax moratorium period of time, do you know?
 23 A I don't even know what that is.
 24 Q There's a time in Pennsylvania
 25 where--they haven't done it recently--but where

1 Q Was it Joseph Dorney (phonetic)?
 2 A That's Durney.
 3 Q My apologies. Was that a yes?
 4 A Yes.
 5 Q At some point in time do you recall
 6 Bob coming out to your home to load some files
 7 from the campaign onto the computer?
 8 A Yes.
 9 Q And what happened to the old
 10 computer?
 11 A I don't have any idea.
 12 Q Is it still in your home right now?
 13 A No.
 14 Q And that was a York County computer;
 15 am I correct?
 16 A I don't know.
 17 Q Do you know if that computer was ever
 18 returned to York County?
 19 A I have no idea.
 20 (Mr. Jacob and client confer
 21 privately.)
 22 Q Have you ever seen cocaine or any
 23 other illegal substance?
 24 A Um-hm.
 25 Q And under what circumstances have you

1 they cancel the tax on computers.
 2 A Oh, yes. Yeah.
 3 Q So it was during that time?
 4 A Yes.
 5 Q And you say that the purpose of the
 6 computer was for the re-election campaign?
 7 A Yes.
 8 Q Was this for Stan to use for the
 9 re-election?
 10 A No, we both used it, but I never
 11 prepared documents because I'm a lousy typist.
 12 Q Fair enough. What did you do for the
 13 campaign that required the use of the computer?
 14 A I got out the list, names, addresses.
 15 I did a lot of the invitations, and that's what
 16 I used it for.
 17 Q Okay. Do you recall meeting Bob at
 18 the Gateway store?
 19 A Yes.
 20 Q And do you recall him helping you to
 21 pick out a computer?
 22 A Yes.
 23 Q Do you recall who signed the check
 24 that was used to pay for that computer?
 25 A No, I don't.

1 seen that?
 2 A I've had very many classes where
 3 Tony G. would come in and teach people what
 4 drugs looked like and the dangers of drugs and
 5 things.
 6 Q When we say Tony G., we're referring
 7 to?
 8 A I can't say his last name. I'm with
 9 you on that one.
 10 Q Tony Glowczewski; is that correct?
 11 A That's close enough, yep.
 12 Q That's just for purpose of the
 13 record.
 14 Is there any reason why Bill Graff
 15 would have referred to you at some point in time
 16 as a drug addict?
 17 A Not that I'm aware of. I mean, not
 18 that -- You mean --
 19 Q I have to ask the questions.
 20 A I want to see if I understand the
 21 question. Are you saying is there any reason he
 22 would say that because there was a chance I am,
 23 or are you just --
 24 Q I'm just saying, do you know why he
 25 would make that reference to you?

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1 A I have no idea.
 2 Q Do you know if Mr. Rebert ever told
 3 Mr. Graff that he was fired for making such a
 4 comment?
 5 A Um-hm.
 6 Q He did? Can you explain how that
 7 occurred?
 8 A Somebody came to see us and said that
 9 Bill had made a comment that the reason -- I
 10 don't quite get it, but some kind of case and
 11 said because he was my drug dealer. And, yeah,
 12 Stan went right to his house and he denied it.
 13 Q When you say he was my drug dealer, I
 14 don't think I understand the explanation.
 15 A Bill said something about somebody
 16 who was -- there was a case involving him. And
 17 he said --
 18 Q Involving Bill?
 19 A No, no, involving a young man who I
 20 knew his family, his parents --
 21 Q Okay.
 22 A -- and said, he's Susan's drug
 23 dealer.
 24 Q Okay. And so, based on that Bill may
 25 or may not have made this comment; is that --

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1 A Yeah, he made the comment. I thought
 2 the question was did I know why.
 3 Q Yes. I'm simply asking you, do you
 4 have any idea why he would refer to you --
 5 A No, absolutely none.
 6 Q But Stan did fire Bill Graff for that
 7 comment; is that correct?
 8 A I wasn't there. I know he went to
 9 his house and was very angry.
 10 Q I thought you previously said that
 11 when I asked did he get fired for --
 12 A Well, he went to his house to fire
 13 him. Bill is still there, so I guess it didn't
 14 work.
 15 Q That was going to be my next
 16 question. Is there any reason why Bill didn't
 17 leave if he was fired? Do you have any
 18 knowledge of that?
 19 A He just didn't leave.
 20 Q Okay. So he was fired and he just
 21 said I'm --
 22 A He sent us a Christmas card and said
 23 thanks for understanding my problems and never
 24 left.
 25 Q Do you know what problems he was

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1 referring to?
 2 A Yeah. The problem of saying I had a
 3 drug dealer.
 4 Q Okay.
 5 A That was a bit of a problem.
 6 Q But that was a problem of Bill
 7 Graff's? I'm a little confused.
 8 A Of Bill having said it.
 9 Q Oh, I see what you're saying, okay.
 10 I guess that would be a problem if you say that
 11 about the boss's wife.
 12 But Stan never insisted, to your
 13 knowledge, that he actually leave his
 14 employment?
 15 A He went to his house with the
 16 intention of firing him. I think Stan sent him
 17 several memos--This is what I understand. I
 18 don't know if this is true--saying you're fired,
 19 but Bill didn't leave, and I told him I forgave
 20 him.
 21 Q You told who you forgave?
 22 A Stan, that I forgave Bill. And if it
 23 was because of me, I didn't want to be involved.
 24 I mean, I didn't want it to be my --
 25 Q Were you ever at any social function,

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1 gathering or anything where cocaine or illegal
 2 substances were present?
 3 A No.
 4 Q Do you know a William Bennett?
 5 A No. Well, yeah, I think he's --
 6 Isn't he a famous lawyer, Bill Bennett?
 7 Q I'm just asking if you know him.
 8 A No, I don't know that one. That name
 9 doesn't mean a thing to me.
 10 Q How about Woody Bennett?
 11 A Yeah, I've heard of Woody Bennett.
 12 He's a football player I think.
 13 Q Were you ever in the vicinity or
 14 around Woody Bennett?
 15 A I was at a couple parties of Judy
 16 Waltman's where he was.
 17 Q I'm sorry, whose?
 18 A Her name is Judy -- Well, it's Bacon
 19 now.
 20 Q Were you ever present -- Let me
 21 rephrase that.
 22 Why don't you tell me about the
 23 gathering or wherever you were where Woody
 24 Bennett was.
 25 A It was just a party.