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1 BEFORE THE HEARING SUBCOMMITTEE
2 OF THE INTERIM LEGISLATIVE ETHICS COMMITTEE

3

4 IN RE: Representative Carl Trujillo,
5 Respondent.

6

7 DEPOSITION OF JESSICA JOHNSON

8 October 24, 2018
9 10:00 a.m.
10 Suite 1500
11 201 Third Street, Northwest
12 Albuquerque, New Mexico

13 PURSUANT TO THE NEW MEXICO RULES OF CIVIL
14 PROCEDURE, this Deposition was:
15 TAKEN BY: ERIC LOMAN, ESQ.
16 ATTORNEY FOR RESPONDENT

17 REPORTED BY: KENDRA D. TELLEZ
18 CCR 205
19 Kendra Tellez Court Reporting, Inc.
20 302 Silver, Southeast
21 Albuquerque, New Mexico 87102

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25

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1 APPEARANCES

2 For the Petitioner:
3 HINKLE SHANOR, LLP
4 218 Montezuma Avenue
5 Santa Fe, New Mexico 87501
6 (505) 982-4554
7 thhnasko@hinklelawfirm.com
8 BY: THOMAS M. HNASKO, ESQ.

9 For the Respondent:
10 JACKSON, LOMAN, STANDFORD & DOWNEY, P.C.
11 Suite 1500
12 201 Third Street, Northwest
13 Albuquerque, New Mexico 87103
14 eloman@jacksonlomanlaw.com
15 BY: ERIC LOMAN, ESQ.

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1 JESSICA JOHNSON

2 having been first duly sworn, testified as follows:

3 EXAMINATION

4 BY MR. LOMAN:

5 Q. Good morning.

6 A. Hi.

7 Q. My name is Eric Loman. I represent Carl

8 Trujillo. You probably gathered that. At first,

9 let me ask you: Do you go by Shelton or Johnson?

10 What would you prefer me to call you today?

11 A. Johnson, I guess.

12 Q. Okay. Have you ever been in a deposition

13 before?

14 A. No.

15 Q. Okay. So you just swore to tell the

16 truth, and in that sense, it's just like you're

17 testifying in a courtroom.

18 A. I'm under oath, right.

19 Q. Under penalty of perjury, that's right.

20 Clearly, it's a less formal setting. If you need to

21 take a break at any time, let me know.

22 A. Okay.

23 Q. I would just ask that if there's a

24 question on the table, that you answer it before we

25 break. Okay? But if you need to use the restroom

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1 or get a drink or whatever, just let me know. We're

2 not going to be here all day. But I don't want you

3 to feel like I'm keeping you in your seat. As a

4 friend of mine described it, if you leave the room,

5 I'll stop asking questions. So --

6 A. How long do you expect this to take?

7 Q. Well, a lot of that depends on you, but

8 you know, couple of hours, I would guess.

9 A. Okay.

10 Q. I try to be pretty efficient in these

11 things.

12 A. Okay.

13 Q. Let me ask you: Are you on any medication

14 today or any substance that would affect your

15 ability, your memory, your ability to speak or

16 testify?

17 A. I don't believe so.

18 Q. Okay. I want to get a little bit of a

19 background on you. I understand that you went to

20 law school; is that right?

21 A. I did.

22 Q. Okay. Have you ever practiced law?

23 A. No.

24 Q. Have you ever been licensed to practice

25 law?

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<p style="text-align: right;">5</p> <p>1 A. No.</p> <p>2 Q. Have you ever worked in a law firm?</p> <p>3 A. Let me think. Well, when I was in</p> <p>4 college, I was like an office assistant in a law</p> <p>5 firm.</p> <p>6 Q. Okay.</p> <p>7 A. And then in law school, I'm thinking of my</p> <p>8 internships and stuff like that. Nothing that I</p> <p>9 would describe as a law firm.</p> <p>10 Q. Okay. After graduating from law school,</p> <p>11 did you ever have a real law job?</p> <p>12 A. A real law job? I -- after a period of</p> <p>13 unemployment, because I graduated in 2011, so the</p> <p>14 economy was still recovering, my first job was</p> <p>15 policy, government relations, and it's been that way</p> <p>16 ever since.</p> <p>17 Q. Okay. And, I'm sorry, you said that was</p> <p>18 2011 that you graduated?</p> <p>19 A. Um-hmm.</p> <p>20 Q. And tell me about that. When you went to</p> <p>21 work in policy, where did you work?</p> <p>22 A. I got a job with the ASPCA, the American</p> <p>23 Society for the Prevention of Cruelty to Animals, in</p> <p>24 their Government Relations Department. I took on a</p> <p>25 role doing grassroots advocacy. This was in</p> <p style="text-align: center;">Jessica Johnson - October 24, 2018</p> <p style="text-align: center;">Examination by Mr. Loman 6</p>	<p style="text-align: right;">7</p> <p>1 A. Yes.</p> <p>2 Q. Okay. And you're doing great so far, but</p> <p>3 because we have a court reporter who is taking down</p> <p>4 every word we say, we need answers to be verbal. So</p> <p>5 if I ask you a yes-or-no question, I need to hear</p> <p>6 "yes" or "no" instead of "uh-uh, uh-huh," or just</p> <p>7 shaking your head.</p> <p>8 A. Okay.</p> <p>9 Q. And if I remind you to give verbal</p> <p>10 answers, I'm not trying to bust your chops --</p> <p>11 A. That's fine.</p> <p>12 Q. -- I'm just trying to get a clean record.</p> <p>13 A. Got it.</p> <p>14 Q. When you came to APV, what job did you</p> <p>15 come here to do?</p> <p>16 A. I was hired as legislative director, and</p> <p>17 shortly thereafter, there was some -- just</p> <p>18 organizational restructuring, and my title changed</p> <p>19 to chief legislative officer, which is the job that</p> <p>20 I have now. The substance of the job didn't change.</p> <p>21 Q. And what was the substance of the job?</p> <p>22 A. To be a primary part of the lobbying</p> <p>23 efforts that APV does to support animal protection</p> <p>24 legislation and to also do political work to support</p> <p>25 animal-friendly candidates.</p> <p style="text-align: center;">Jessica Johnson - October 24, 2018</p> <p style="text-align: center;">Examination by Mr. Loman 8</p>
<p style="text-align: right;">6</p> <p>1 Washington, D.C.</p> <p>2 Q. How long did you work for the ASPCA in DC?</p> <p>3 A. About three-and-a-half years.</p> <p>4 Q. Okay. And I understand you left that job</p> <p>5 to come here and work for APV; is that correct?</p> <p>6 A. Yes.</p> <p>7 Q. All right. And that was in June of 2015?</p> <p>8 A. Correct.</p> <p>9 Q. Is that right?</p> <p>10 A. Um-hmm.</p> <p>11 Q. Did you have any ties to New Mexico?</p> <p>12 A. Other than having met my now boss</p> <p>13 beforehand through my work with ASPCA, there was</p> <p>14 a -- just a trip to Santa Fe. So I knew I liked the</p> <p>15 little bits that I had seen of New Mexico, but I</p> <p>16 don't have any family here.</p> <p>17 Q. Okay. What was the job -- excuse me. I</p> <p>18 usually say this as part my intro spiel. If I ask a</p> <p>19 question that's poorly worded, and I am almost</p> <p>20 definitely going to do that, if you don't understand</p> <p>21 a question for whatever reason, just let me know.</p> <p>22 A. Okay.</p> <p>23 Q. I'll try to rephrase it. If you answer a</p> <p>24 question, we'll all assume that you understood it.</p> <p>25 Is that fair?</p> <p style="text-align: center;">Jessica Johnson - October 24, 2018</p> <p style="text-align: center;">Examination by Mr. Loman 7</p>	<p style="text-align: right;">8</p> <p>1 Q. Okay. And since you're new to New Mexico,</p> <p>2 I imagine one of the first things you do when you</p> <p>3 got here was get the lay of the land about who were</p> <p>4 the animal-friendly candidates. Is that fair?</p> <p>5 A. Sure.</p> <p>6 Q. Who were some of those animal-friendly</p> <p>7 candidates that your colleagues at APV told you</p> <p>8 about?</p> <p>9 A. Well, one of my first duties in the first</p> <p>10 several months of the job was to work on our 2015</p> <p>11 score card, which had traditionally featured and</p> <p>12 continues to feature a page or two that highlights</p> <p>13 our champions, usually sponsors of legislation. So</p> <p>14 I can't -- I can't recall everyone that was on that</p> <p>15 2015 list, but sitting here today, I mean, I can say</p> <p>16 that Carl Trujillo was one of them.</p> <p>17 Q. Okay.</p> <p>18 A. That's what I recall at this point.</p> <p>19 Q. Sure. And that brings up another point.</p> <p>20 If the honest answer to the question is "I don't</p> <p>21 know" or "I don't remember," that's fine. That's</p> <p>22 all we're trying to get at here, is what you</p> <p>23 remember and what you know.</p> <p>24 So the first legislative session you would</p> <p>25 have worked was in 2016?</p> <p style="text-align: center;">Jessica Johnson - October 24, 2018</p> <p style="text-align: center;">Examination by Mr. Loman 9</p>

<p style="text-align: right;">9</p> <p>1 A. That is correct.</p> <p>2 Q. When did you first meet Carl Trujillo?</p> <p>3 A. The first time I can remember meeting him</p> <p>4 was, I believe, prior to the 2017 legislative</p> <p>5 session, during the interim, because we were in</p> <p>6 touch with a citizen advocate who was kind of</p> <p>7 spearheading this effort that resulted in the</p> <p>8 legislation regarding pet food manufacturer fees to</p> <p>9 fund spay/neuter services. And she had approached</p> <p>10 Carl about sponsoring the bill, I think. He is her</p> <p>11 legislator, too, and that's why --</p> <p>12 So I remember there being a meeting</p> <p>13 held -- held in the Roundhouse in one of the smaller</p> <p>14 committee rooms. There was like a long</p> <p>15 conference-like table, and Carl and several other</p> <p>16 people were there.</p> <p>17 Q. Okay. And this was in the interim</p> <p>18 between -- well, the interim before the 2017</p> <p>19 session?</p> <p>20 A. Yes. I would -- I would estimate it was</p> <p>21 in the fall of 2016.</p> <p>22 Q. Okay, thank you. So you did not work with</p> <p>23 him or meet him during the 2016 session?</p> <p>24 A. I don't remember doing that, no.</p> <p>25 Q. Okay. Now, I've seen your written</p> <p style="text-align: center;">Jessica Johnson - October 24, 2018</p> <p style="text-align: right;">Examination by Mr. Loman 10</p>	<p style="text-align: right;">11</p> <p>1 own separate entity, a 501(c)(4), but it kind of --</p> <p>2 we describe it as being the legislative arm of APNM.</p> <p>3 Q. Okay.</p> <p>4 A. So APNM could be like the mother ship, so</p> <p>5 to speak.</p> <p>6 Q. Which entity is your employer?</p> <p>7 A. I get my paychecks from APNM.</p> <p>8 Q. Okay.</p> <p>9 A. I do some work that -- programmatic work</p> <p>10 that is like an APNM program, so I'm not only APV,</p> <p>11 but probably primarily APV.</p> <p>12 Q. Both organizations are right out of the</p> <p>13 same building; is that right?</p> <p>14 A. Yes.</p> <p>15 Q. And primarily the same people involved</p> <p>16 with both?</p> <p>17 A. A lot. There's a lot of overlap.</p> <p>18 Q. Okay. So -- all right. During that time</p> <p>19 in 2014 when you were doing the training with Laura</p> <p>20 Bonar, during that experience, did she say anything</p> <p>21 about Carl Trujillo or anything about sexual</p> <p>22 harassment in the legislature?</p> <p>23 A. I don't -- I don't remember.</p> <p>24 Q. Okay.</p> <p>25 A. What I -- I do remember that she had done</p> <p style="text-align: center;">Jessica Johnson - October 24, 2018</p> <p style="text-align: right;">Examination by Mr. Loman 12</p>
<p style="text-align: right;">10</p> <p>1 statements, of course, and the report, and I</p> <p>2 understand you're saying that when you first got to</p> <p>3 APV, you met Laura Bonar, I assume. Is that where</p> <p>4 you met her?</p> <p>5 A. I met her previously.</p> <p>6 Q. Where had you met her previously?</p> <p>7 A. At some point when I was working for the</p> <p>8 ASPCA, there was like a National Animal Advocacy</p> <p>9 conference in DC. I remember meeting Lisa and Laura</p> <p>10 there, like it -- being introduced to them very</p> <p>11 briefly.</p> <p>12 And then I -- I believe it would have been</p> <p>13 in 2014, to the best of my recollection, that there</p> <p>14 was an invitation for the ASPCA to join APNM and APV</p> <p>15 on kind of a grassroots road trip and hold citizen</p> <p>16 lobbyist trainings and talk about animal legislation</p> <p>17 through various parts of New Mexico. And so I was</p> <p>18 the -- the one that participated in that, and it was</p> <p>19 me and Laura doing that trip.</p> <p>20 Q. Okay. What's the difference between APV</p> <p>21 and APNM?</p> <p>22 A. APNM is the 501(c)(3) organization. It's</p> <p>23 been in existence since 1979, and it had done</p> <p>24 lobbying and legislative work to the extent that the</p> <p>25 IRS allows it. But in 2002, APV was created as its</p> <p style="text-align: center;">Jessica Johnson - October 24, 2018</p> <p style="text-align: right;">Examination by Mr. Loman 11</p>	<p style="text-align: right;">12</p> <p>1 the State legislation lobbying work, but they were</p> <p>2 hiring a legislative director position, and she was</p> <p>3 kind of trying to see if maybe I was interested in</p> <p>4 taking that job. And I wasn't at the time.</p> <p>5 But, you know, if I -- if I think about</p> <p>6 it, I feel this sense of she was trying to not do</p> <p>7 the State legislation work anymore. She was going</p> <p>8 to focus on the Federal stuff. And so that's why</p> <p>9 they were hiring this separate legislative director</p> <p>10 position.</p> <p>11 Q. Okay.</p> <p>12 A. But I don't remember her talking</p> <p>13 specifically about Carl or about any sexual</p> <p>14 harassment experiences.</p> <p>15 Q. At that point?</p> <p>16 A. Not at that point, not to that</p> <p>17 specificity.</p> <p>18 Q. Okay. So then the next year, June of</p> <p>19 2015, you come to Santa Fe to work for APNM?</p> <p>20 A. Yes.</p> <p>21 Q. And I understand at some point, then, you</p> <p>22 told us that -- or described some sort of harassment</p> <p>23 issue. So tell me about that.</p> <p>24 A. Sure. So I would estimate that this was</p> <p>25 in the fall of 2015, and I say that because when I</p> <p style="text-align: center;">Jessica Johnson - October 24, 2018</p> <p style="text-align: right;">Examination by Mr. Loman 13</p>

<p style="text-align: right;">13</p> <p>1 started in June of 2015, there was immediately kind 2 of a -- an issue regarding Game & Fish rule making. 3 That was kind of outside of my normal job 4 description, but they wanted me to work on a 5 campaign. And I know that that lasted about all 6 summer. So I don't think I really started focusing 7 on preparing for my first legislative session until 8 the fall. 9 And I remember being in the Albuquerque 10 office and sitting in Laura's office, in particular, 11 and it -- you know, it wasn't -- it wasn't like a 12 formal scheduled meeting. It was just sort of 13 hanging out, and I was thinking about the next 14 session and, you know, asked her for advice, like, 15 "Tell me what it's going to be like." 16 And so it was during that conversation 17 that I remember her saying something like, "Be 18 careful" or "Watch yourself." And, you know, she 19 talked about a few different experiences, and one of 20 them was Carl Trujillo. And she didn't -- you know, 21 now I know more details, and so I know that she 22 didn't tell me everything. She kind of kept things 23 general. 24 Q. And we'll get to those details. 25 A. Okay. <p style="text-align: center;">Jessica Johnson - October 24, 2018 Examination by Mr. Loman 14</p> </p>	<p style="text-align: right;">15</p> <p>1 Q. Okay. 2 A. -- what happened, if that would be 3 helpful. 4 Q. Sure. 5 A. One of the incidents she described -- she 6 didn't characterize it as sexual harassment, but 7 just as something kind of odd and maybe a little 8 demeaning. There was a legislator, during the 9 session, in the hallways with people milling about. 10 They were having a conversation, and he took her 11 face in his hands, cradled her face. She felt like 12 that was uncomfortable. 13 She also shared a story about another 14 colleague of ours, where a legislator was angry at 15 us and this person, in particular, for killing their 16 legislative effort. And he walked by and kind of 17 shoulder checked and pushed this person to the 18 floor. 19 Q. Wait, I'm sorry. So the legislator 20 shoulder checked Laura Bonar to the floor? 21 A. Not Laura. It was a different person. 22 Q. So this is just something she witnessed? 23 A. Yeah, she either witnessed or she knew 24 about it. 25 Q. Okay. A different person with APNM? <p style="text-align: center;">Jessica Johnson - October 24, 2018 Examination by Mr. Loman 16</p> </p>
<p style="text-align: right;">14</p> <p>1 Q. So I just want to focus on what she 2 told -- what she told you that first time. 3 A. Okay. So she told me that Carl made 4 advances on her, came on to her. I remember when 5 she was describing that, she mentioned something 6 about him inviting her to dinner and that feeling a 7 little odd to her and that things kind of escalated. 8 She did her best to try to stay really polite and 9 respectful and kind of rejecting his advances and 10 that nevertheless at some point, he got mad and 11 stormed off and then stopped returning her phone 12 calls. 13 Q. Okay. Do you recall any other details 14 that she gave you during that first discussion in 15 the fall of 2015? 16 A. Nothing that I can for sure point to that 17 date. 18 Q. All right. And I want to make sure I 19 understood you earlier. Did you mean that she also 20 told you about other legislators who had been 21 inappropriate? 22 A. Yes. 23 Q. Who were those? 24 A. I'm not going to name the names, but I can 25 describe . . . <p style="text-align: center;">Jessica Johnson - October 24, 2018 Examination by Mr. Loman 15</p> </p>	<p style="text-align: right;">16</p> <p>1 A. Yes. 2 Q. Okay. Anything else? 3 A. Those are the ones that I remember. 4 Q. All right. So I'm going to hand you -- 5 this has been previously marked. 6 MR. LOMAN: I'll take a sticker. 7 (Exhibit 1 Marked for Identification.) 8 MR. LOMAN: So that will be 1, Tom. 9 Q. So I've marked this as Exhibit 1. Do you 10 recognize this? 11 A. Um-hmm. 12 Q. That's your signature at the bottom? 13 A. Yes. 14 Q. Thank you for the "yes." Okay. So this 15 is a statement that you prepared. It's dated May 16 3rd of this year, right? 17 A. Yes. 18 Q. Did you prepare it on that day or did it 19 go through a, you know, drafting process? 20 A. I believe I wrote it on May -- the evening 21 of May 2nd. 22 Q. Okay. 23 A. And then it was distributed May 3rd. 24 Q. Distributed to whom? 25 A. To the media. I believe it was May 3rd. <p style="text-align: center;">Jessica Johnson - October 24, 2018 Examination by Mr. Loman 17</p> </p>

<p style="text-align: right;">17</p> <p>1 To the media. 2 Q. Okay. It's dated May 3rd. 3 A. Yeah. 4 Q. Right? 5 A. Right. 6 Q. Okay. Why did you write this? 7 A. I wrote it because after Laura's 8 allegations became public, I saw and read Carl's 9 reaction on social media, at least. I can't recall 10 if there was media coverage at that point. You 11 know, attacking the credibility of Laura and, to 12 some extent, the credibility of the organization, 13 and I felt like that was wrong. And so I just felt 14 moved to provide some corroborating evidence to the 15 extent that it might be helpful. 16 Q. Okay. Did anyone ask you to write this? 17 A. No. 18 Q. Or did anyone ask you to provide 19 corroborating evidence at that point? 20 A. I -- when everything was breaking public 21 and I was watching all the reactions, I told Laura, 22 "If it would help, I'm happy to make a statement to 23 the media talking about what I know and our past 24 conversations." 25 Q. Okay. <p style="text-align: center;">Jessica Johnson - October 24, 2018 Examination by Mr. Loman 18</p></p>	<p style="text-align: right;">19</p> <p>1 did. 2 Q. So you sent it to -- so you sent it to 3 Levi then? 4 A. Yes. 5 Q. And he distributed it however he did? 6 A. Yes. 7 Q. All right. You got bullet points there in 8 the middle. In your fourth bullet point there, 9 "Only in the last few days, with Ms. Bonar going 10 public...[I have] learned the full extent and 11 severity of Carl Trujillo's sexual harassment 12 against her..." right? 13 A. Yes. 14 Q. Tell me about that. What happened in 15 the -- what had happened in the last few days? What 16 details did you get at that point? 17 A. So I wasn't involved in most, if not any, 18 of the discussions and decision making that directly 19 led up to Laura releasing her open letter. And I 20 think when I wrote that, the state of mind that I 21 was in was sort of -- you know, I had -- I had felt 22 a little left out and upset that there was something 23 that was -- looked like it was going to happen that 24 was going to really impact my job and possibly my 25 life, and I wasn't involved in it. And Laura, I <p style="text-align: center;">Jessica Johnson - October 24, 2018 Examination by Mr. Loman 20</p></p>
<p style="text-align: right;">18</p> <p>1 A. And she said, "That might be helpful." 2 Q. And generally, in your statement here, you 3 describe, I think, the encounter that you just 4 described for me, right? 5 A. Um-hmm. 6 Q. Yes? 7 A. Yes. 8 Q. And we're talking about this same 9 conversation you had in the fall of 2015 where she 10 described inappropriate -- inappropriateness that 11 she had seen by a handful of legislators, including 12 Carl Trujillo. Is that fair? 13 A. Yes, yes. 14 Q. All right. Who saw this before you made 15 it public? 16 A. I believe I showed it to Lisa, Laura, and 17 Levi Monagle. 18 Q. Okay. Lisa is a Lisa Jennings? 19 A. Yes. 20 Q. And I think you said you distributed it by 21 giving it to the media. Who specifically did you 22 give it to? 23 A. I -- I wasn't interested in -- in directly 24 dealing with the media mob, and so I asked if Levi 25 would distribute it for me, Levi Monagle, and he <p style="text-align: center;">Jessica Johnson - October 24, 2018 Examination by Mr. Loman 19</p></p>	<p style="text-align: right;">20</p> <p>1 think, was -- sorry, that might be my phone. 2 Q. That's okay. 3 A. So Laura hadn't talked to me about this 4 until -- about -- you know, about this, the going 5 public, in any substance until the day before the 6 open letter was released. And she and I had a long 7 phone conversation that night where I kind of shared 8 my feelings, and she kind of just let it all out. 9 So all of the details I know now, I learned in that 10 phone conversation beforehand. 11 Q. Gotcha. And that was -- so if the open 12 letter was published on May 2nd, this would have 13 been the evening of May 1st? Am I understanding 14 that correctly? 15 A. Yes, I believe so. 16 Q. Okay. So at that point, then, what were 17 all the details? 18 A. The new things that I heard on May 1st was 19 that -- the touching, which I know didn't end up 20 being -- you know, no probable cause was found in 21 the report. But she did tell me about him touching 22 her leg in a committee room, and it was the first 23 time that I -- I really heard about what was 24 perceived as retaliation with -- with Carl, not just 25 refusing to answer Laura's phone calls, but <p style="text-align: center;">Jessica Johnson - October 24, 2018 Examination by Mr. Loman 21</p></p>

<p style="text-align: right;">21</p> <p>1 apparently not -- not responding to communications 2 from any other staff persons with APV during that 3 session after -- after the incident -- or having 4 difficulty hearing from him or something like that. 5 So it was the touching and the retaliation 6 that was sort of like, oh, wow. That's something 7 that hadn't been shared with me before. 8 Q. So let's break that down a little bit. 9 The touching, where on her leg did she tell you that 10 he touched her? 11 A. From what I think I remember, is her 12 thigh. 13 Q. Did she describe inner thigh? Outer? 14 Upper? 15 A. I don't recall. 16 Q. And did she tell you in any more detail 17 any comments that he made to her during that 18 incident? 19 A. She -- because she was telling -- kind of 20 telling me everything, she reiterated stuff that 21 I -- I -- that I had learned previous, so before 22 this May 1st conversation, but after this fall 2015 23 conversation. 24 Q. Okay. Like what? 25 A. Those details were -- it was something Jessica Johnson - October 24, 2018 Examination by Mr. Loman 22</p>	<p style="text-align: right;">23</p> <p>1 effort that Carl wasn't able to continue. To be 2 honest, even if that's true, I don't think that 3 makes everything that I've seen fully square in my 4 head, but I wasn't there, so I don't know for sure. 5 Q. All right. You had worked with -- you had 6 worked with Carl Trujillo, if I understand you 7 correctly, during the 2017, 2018 sessions -- 8 A. Correct. 9 Q. -- is that right? And had some dealings 10 with him during those interims; is that true? 11 A. Yes. 12 Q. Okay. Has he ever been inappropriate to 13 you in any way? 14 A. There was -- I think because I knew what 15 Laura had told me, there was one questionable 16 comment. 17 Q. Okay. And what was that? And when was 18 that? 19 A. It was in the final few days of the 2018 20 legislative session. It was when the legislature 21 was meeting late at night. So the House was in 22 session on the floor. I was up in the House gallery 23 because Carl's bill, House Bill 64, had -- if -- it 24 had passed through the House, then also through the 25 Senate with Senate amendments. And so it needed to Jessica Johnson - October 24, 2018 Examination by Mr. Loman 24</p>
<p style="text-align: right;">22</p> <p>1 about her going to sit next to him in a committee 2 room and him making some comment to her about 3 wanting to sit next to a fireplace or something like 4 that. 5 Q. Okay. Any other details that you recall? 6 A. There was also -- I can't recall if it was 7 the same day or a different day that he had like 8 pulled her aside and kind of cornered and asked her 9 like, "When can we meet?" 10 Q. Okay. And then back to Exhibit 1 in that 11 same bulleted paragraph, you talk about the 12 retaliatory impact and what happened during the 2014 13 legislative session. Of course, you weren't 14 there -- 15 A. Correct. 16 Q. -- right? So this is all what's been told 17 to you by? 18 A. Laura Bonar and Lisa Jennings. 19 Q. Have you learned anything in the past few 20 months that refutes that he retaliated against APNM 21 or didn't champion their causes during that 2014 22 session? 23 A. I'm aware because I read Special Counsel's 24 report that Senator Richard Martinez said that Carl 25 had secured his help to carry on the issue, the Jessica Johnson - October 24, 2018 Examination by Mr. Loman 23</p>	<p style="text-align: right;">24</p> <p>1 come back over to the House floor for a concurrence 2 vote to give a thumbs up to those Senate side 3 amendments. 4 And so I was there, you know, just in case 5 there was any additional floor debate. I wanted to 6 be there in case I needed to text him any helpful 7 information if he was fending things off on the 8 floor. 9 But the bill came up, and the House voted 10 just by voice vote to concur with the amendments. 11 And so at that point, our bill had passed the 12 legislature. So I was thrilled, and I texted him 13 something like, you know, "Congratulations. Thank 14 you so much for your hard work," smiley face, smiley 15 face. 16 And he responded with, "We need to get 17 wine." And I'm not characterizing that as sexual 18 harassment at all, but because I knew that Laura's 19 experience had started with an invitation to go get 20 dinner, I just wondered: Is this the start of that? 21 Could it be? So I was very thoughtful about how to 22 respond in a way that wasn't going to offend him, 23 but also clearly wasn't accepting a one-on-one wine 24 date, just in case. 25 Q. Okay. Other than that, was there any Jessica Johnson - October 24, 2018 Examination by Mr. Loman 25</p>

<p style="text-align: right;">25</p> <p>1 other moments where you think he was harassing you 2 in some way? 3 A. No. 4 Q. All right. And this was at the end of, as 5 you say, a long night at the legislature, right? 6 A. Yeah, it was maybe 9:00 or 10:00 p.m. 7 Q. I mean, I would imagine everyone involved 8 is ready for a drink after one of those days, right? 9 A. Perhaps. 10 Q. Okay. 11 A. I haven't -- I mean, I haven't gotten an 12 invitation to go get wine from any other legislator 13 thus far, but, you know. 14 Q. Down in your last paragraph, you 15 reference, again, that she shared her story with you 16 in 2015, and we've talked about that, right? 17 A. Um-hmm. Yes. 18 Q. Thank you. And you say you were not 19 involved in Ms. -- did you say Bonar? Is that how 20 she pronounces it? 21 A. Yeah, Bonar. 22 Q. Thank you. She said you were "not 23 involved in Ms. Bonar's decision to publish an open 24 letter nor the timing of her letter." 25 I think you talked about that a little Jessica Johnson - October 24, 2018 Examination by Mr. Loman 26</p>	<p style="text-align: right;">27</p> <p>1 was going to focus on the open letter. 2 Q. Did she say anything to you to explain why 3 she thought the policy was inadequate or why she 4 didn't think she could get any help from it? 5 A. Again, I'm not certain the exact day or 6 timing of these conversations. But at some point, I 7 learned that she became aware that there were 8 several complaints made under this new policy that 9 had gone nowhere and never saw the light of day. So 10 my impression is that she was concern -- she was 11 concerned that the same thing would happen to her 12 complaint. 13 Q. Okay. Now, you -- you mentioned earlier 14 that you read the Special Counsel's findings and the 15 investigation report? 16 A. Yes, I -- 17 Q. Right? 18 A. -- I read it the -- I think the night or 19 the day after the report became public, and I 20 actually haven't read it since. 21 Q. All right. 22 (Exhibit 2 Marked for Identification.) 23 Q. Well, it's 40-some pages long, and I'm not 24 going to ask you to read the whole thing today. 25 A. I appreciate that. Jessica Johnson - October 24, 2018 Examination by Mr. Loman 28</p>
<p style="text-align: right;">26</p> <p>1 bit, too, right, earlier today? 2 A. I think -- I think so. If the caffeine is 3 working, I think I remember that. 4 Q. Fair enough. So when did you find out 5 that she was going to publish an open letter? And I 6 will tell you that it was published on May 2nd, so 7 if that helps. 8 A. Yeah. I remember that it was published on 9 May 2nd and -- you know, I'm not completely sure. I 10 think it was when -- about the week previous to 11 that, that I knew that it would be in the form of an 12 open letter. 13 Q. Prior to that, was there any talk from Ms. 14 Bonar about filing a formal complaint pursuant to 15 the legislature anti-harassment policy? 16 A. I can't remember right now the order of 17 these conversations where I learned this 18 information. I do recall her saying to me at some 19 point before May 2nd that -- I believe -- well, I 20 guess regarding the sexual harassment policy, just 21 that she had the impression that even the new policy 22 enacted by the legislature in the 2018 legislative 23 session, that policy was kind of inadequate, and 24 she, you know -- she had reason to doubt that the 25 policy was -- was even going to help her. So she Jessica Johnson - October 24, 2018 Examination by Mr. Loman 27</p>	<p style="text-align: right;">28</p> <p>1 Q. But I'm handing you -- what I marked as 2 Exhibit 2 is page 19 from the report. 3 A. Okay. 4 MR. LOMAN: Do you want me to get you 5 a copy? 6 MR. HNASKO: No, that's all right. 7 Q. And this is the page where it talks about 8 you. So at some point, you were interviewed by a 9 Special Counsel, right? 10 A. Yes. 11 Q. And I'm happy to let you look at 12 the other -- at the next page, but I'll tell you, at 13 the top of page 20, it picks up with Gene Grant. So 14 page 19 is -- is your portion of the investigation. 15 And it says that, "In late 2014...she," meaning you, 16 "was preparing to work in her first legislative 17 session (2015)" -- and that's not accurate, correct? 18 A. That is inaccurate. 19 Q. Okay. You started in 2015, and your first 20 session was in 2016, right? 21 A. That's correct. 22 Q. Okay. And then going down to paragraph 23 "b," it says, "During the orientation meeting for 24 the 2015 legislative session, Ms. Johnson...reported 25 that Ms. Bonar generally described the three Jessica Johnson - October 24, 2018 Examination by Mr. Loman 29</p>

<p style="text-align: right;">29</p> <p>1 incidents of alleged harassment." So that 2015 is 2 incorrect as well, right? 3 A. Yes. 4 Q. Should that read, "During the orientation 5 meeting for the 2016 legislative session"? 6 A. Yes. 7 Q. Okay, thank you. All right. Is this a 8 separate meeting than the -- or separate 9 conversation than the one you described to me 10 earlier? 11 A. No. 12 Q. Okay. And it said -- it says that, "Ms. 13 Johnson...reported that Ms. Bonar generally 14 described the three incidents of alleged 15 harassment." 16 What were those three incidents? Because 17 I think you only talked about one earlier. 18 A. Yeah, I believe that Special Counsel, in 19 terms of timing, got a few things wrong and 20 conflated some of the information that I had said 21 into this one conversation in 2015. You know, I 22 recall during that interview process -- when 23 answering questions, I seem to recall that talking 24 about the "near a fireplace" comment and the 25 touching her thigh. I recall saying that I just Jessica Johnson - October 24, 2018 Examination by Mr. Loman 30</p>	<p style="text-align: right;">31</p> <p>1 Q. All right. So a couple of days ago, you 2 provided us, through Mr. Hnasko, some Answers to 3 Interrogatories. 4 A. Um-hmm. 5 Q. You recall doing that, I'm sure? 6 A. Oh, he just forwarded it, okay. 7 Q. What did you think was going to -- 8 A. I thought maybe he would turn it into a 9 very pretty filing, but -- but this is fine. 10 Q. All right. 11 A. I thought maybe he would remove some of my 12 inflammatory language. 13 Q. Going on to the second page, your response 14 to Interrogatory Number 2, you have under a 15 headline -- or heading, "Laura Bonar. Approximate 16 date: Fall of 2015," and then you describe this 17 discussion that you had with her, and I think this 18 is the one we've already discussed, right? 19 A. Yes. 20 Q. Okay. And then you say in November 2017, 21 you were discussing the Me Too movement with Ms. 22 Bonar, and she reminded you of her sexual harassment 23 experience with Carl Trujillo. Do you see that? 24 A. Yes. 25 Q. First let me ask you: At that point, did Jessica Johnson - October 24, 2018 Examination by Mr. Loman 32</p>
<p style="text-align: right;">30</p> <p>1 couldn't remember exactly when Laura had told me. 2 Q. Okay. 3 A. So for some reason, Special Counsel put it 4 into this one same meeting. 5 Q. Okay. 6 A. But since that interview, as things have 7 gelled in my head as I think memory does, I started 8 to piece together when Laura had told me that 9 additional information about the fireplace and the 10 touching of the thigh. 11 Q. Okay. And this -- you know, this report 12 is attributing statements to you, kind of putting 13 words in your mouth. So that's the reason I pulled 14 it out, is I want you to have the opportunity to 15 correct anything that you should be corrected on, so 16 I appreciate that. 17 A. Sure. 18 MR. HNASKO: I'm going to object on 19 the statement "putting words in your mouth." It's 20 designed to characterize what Special Counsel 21 believed she said. Whether it's accurate or 22 inaccurate is a different matter. 23 MR. LOMAN: Okay. 24 Q. That's all I have there. 25 (Exhibit 3 Marked for Identification.) Jessica Johnson - October 24, 2018 Examination by Mr. Loman 31</p>	<p style="text-align: right;">32</p> <p>1 she give you any new details? 2 A. No, I don't believe so. 3 Q. And you say it was "in the context of a 4 possibility that others have had...[similar 5 experiences] with him." 6 Tell me about that. Why did she think 7 others had had similar experiences? 8 A. I don't know. 9 Q. Did she give you any names of people who 10 she thought had had a similar experience with him? 11 A. No. 12 Q. Did she describe any other experiences 13 that another person had had with Carl Trujillo? 14 A. Not in that conversation, no. 15 Q. All right. And then the next month, in 16 December -- on December 14, 2017, now you say that, 17 "At that point, Laura shared with me more 18 details..." 19 So tell me what details were shared in 20 December of 2017? 21 A. So I've been able to piece together that I 22 believe it was during this conversation that she 23 shared with me the: Going to sit next to him in a 24 committee hearing, saying something about him 25 wanting -- him saying something about wanting to sit Jessica Johnson - October 24, 2018 Examination by Mr. Loman 33</p>

<p style="text-align: right;">33</p> <p>1 next to her in front of a fireplace, and the comment 2 of him asking when they can meet after he pulled her 3 aside. 4 Q. On February 2nd, you say that she -- let 5 me take a second. 6 On February 2, 2018, you say that you had 7 this other exchange with her, and she made a comment 8 about "perpetrators in the State House" and you 9 assumed she was referring to Carl Trujillo? 10 A. Yes. 11 Q. Just to be clear, she didn't actually 12 mention his name and didn't give you any more 13 information, more details at that point; is that 14 correct? 15 A. Correct. 16 Q. All right. And then on May 1st. I think 17 we've already talked about this discussion in more 18 detail, right? 19 A. Yes. 20 Q. Okay. And you say that on May 1st, you 21 "discussed the tentative plan to go public with the 22 allegations..."? 23 A. Um-hmm. 24 Q. Did you see the open letter before it was 25 made public? <p style="text-align: center;">Jessica Johnson - October 24, 2018 Examination by Mr. Loman 34</p> </p>	<p style="text-align: right;">35</p> <p>1 you had discussions with him in April, May 2018, and 2 I'm not going to ask you about the details of those, 3 but did you ever talk to him before -- so you frame 4 this as April/May 2018. So prior to April 2018, did 5 you ever tell your husband that you had any concern 6 about Carl Trujillo or anything like that? 7 A. I -- I don't recall having a conversation 8 with him in any detail. I do recall coming home 9 after that meeting took place in the fall of 2015, 10 after I had been told about sexual harassment and 11 awkward touching and getting pushed over by a 12 legislator, I remember coming home and lamenting to 13 him "Okay, great. This is the job I signed up for. 14 I'm so excited." 15 And I don't think I -- I mean, it was 16 kind -- it was all told to me in confidence, so I 17 don't recall saying anything specific to him. I've 18 already asked him if he remembers me lamenting at 19 that time, and I was not surprised to learn that no, 20 he does not. 21 Q. Okay. Sounds like a familiar conversation 22 I've had with my wife. 23 A. Yeah. 24 Q. So for those, you know, two, three years, 25 whatever it was that Ms. Bonar told -- had told you <p style="text-align: center;">Jessica Johnson - October 24, 2018 Examination by Mr. Loman 36</p> </p>
<p style="text-align: right;">34</p> <p>1 A. It was either immediately before or 2 simultaneous with it going public, because APV 3 has -- had been -- we intended to, you know, have 4 the organization issue a statement soon after the 5 letter went public, and I was involved in the 6 execution of that, posting things on social media. 7 I think it was just social media. 8 So at some point, I needed to be given the 9 letter so that I could have it uploaded, hosted on 10 our website so we could link to it. 11 Q. And why were you -- why was APV posting 12 this on its social media? 13 A. Because as the organization decided that 14 with Laura going public and asking for Carl's 15 resignation and his withdrawal from his reelection 16 campaign from the race, that we would do the same. 17 And he had previously received a lot of support from 18 our organization, so with the change, we needed to 19 correct that. 20 Q. Okay. Who runs the Twitter account for 21 APV? 22 A. A few folks have access, but in -- during 23 my time with the organization, I think I've done 24 most of the posting. 25 Q. You mentioned your husband on here, that <p style="text-align: center;">Jessica Johnson - October 24, 2018 Examination by Mr. Loman 35</p> </p>	<p style="text-align: right;">36</p> <p>1 this in confidence and wanted you to keep it 2 confidential, do you know why she had a change of 3 heart this spring and decided to make it very, very 4 public? 5 A. When I reflect on it, I think it started 6 with -- around the time of, you know, the -- in my 7 answers to the Interrogatories, the first time that 8 I list talking with her about it after the fall of 9 2015, I know that that's when like the Me Too 10 movement was bubbling up and people were -- you 11 know, there was this sense of, okay, you know, women 12 are coming out and they're trying to hold people 13 accountable. And so I -- you know, my sense when I 14 look back on the conversations we had, that it was 15 really starting to bother her around that time that 16 she hadn't done anything about it. 17 Q. Do you know if she talked to anyone that 18 encouraged her to do this? 19 A. I know that she had consulted with a few 20 other people, I think, trying to figure out what 21 route to take. 22 Q. Do you know who? 23 A. I know at some point, she -- I'm not sure 24 how, but she got matched up with Levi Monagle, who 25 is now her attorney and advocate. I know he was <p style="text-align: center;">Jessica Johnson - October 24, 2018 Examination by Mr. Loman 37</p> </p>

<p style="text-align: right;">37</p> <p>1 involved. I couldn't say for sure who the other 2 people are. I could guess, but I will refrain from 3 doing that.</p> <p>4 Q. All right. Let's go on to the next page 5 of your responses here. In response to Request for 6 Production Number 2, you say you're not going to 7 produce documents or communications that happened on 8 or after May 2, 2018, which was the date of the open 9 letter. Tell me why you think we're not entitled to 10 those materials after that date?</p> <p>11 A. Well, because those communications, 12 whether I received them as positive or negative, 13 were all reactions to what people were reading in 14 the news or reading from social media. So I think 15 it's just outside of the scope here.</p> <p>16 Q. All right. And you stand by that? You're 17 refusing to provide whatever materials you have that 18 were after May 2nd?</p> <p>19 A. At this point. I mean, I think if -- if 20 there's an opportunity for someone to object to that 21 and have it heard by the subcommittee and have it 22 ruled on, I'd be willing to reconsider. If the 23 cochairs of the subcommittee demand that I turn 24 things over, I would think about it, but at this 25 point, I don't feel like I need to.</p> <p style="text-align: center;">Jessica Johnson - October 24, 2018 Examination by Mr. Loman 38</p>	<p style="text-align: right;">39</p> <p>1 is probably the best person to talk about what was 2 actually happening.</p> <p>3 (Exhibit 5 Marked for Identification.)</p> <p>4 Q. One of the -- I'm going to hand you 5 Exhibit 5. This is one of the things you produced 6 to us this last week, and there was an e-mail 7 exchange between you and Lisa Jennings on May 1st. 8 And you did some comments to a Word document. It 9 looks like, to me -- please tell me if I'm wrong. 10 It looks to me like Lisa sent you a Word document, 11 and you made some edits and made some comments, 12 right?</p> <p>13 A. That's correct.</p> <p>14 Q. And the second page is the Word document 15 that was attached to the e-mail. And where it says, 16 "Comment [JJ]," that's you, right?</p> <p>17 A. Yes.</p> <p>18 Q. Okay. What was this document?</p> <p>19 A. So this was prior to the open letter 20 becoming public. Lisa had crafted a public 21 statement from APV, from her as APV executive 22 director, and I believe these are also some talking 23 points that I think were shared with staff and board 24 members to help guide them on how to deal with any 25 inquiries about the matter.</p> <p style="text-align: center;">Jessica Johnson - October 24, 2018 Examination by Mr. Loman 40</p>
<p style="text-align: right;">38</p> <p>1 Q. Now, at the time that all of this was 2 about to break, so I'm talking about April, May 3 2018, your organization was planning a fundraiser 4 for Carl, right?</p> <p>5 A. So that is my understanding. I was on a 6 long vacation from mid-March to early to mid-April, 7 so there were -- I am aware of another fundraiser 8 for Carl being scheduled and then canceled during my 9 absence.</p> <p>10 (Exhibit 4 Marked for Identification.)</p> <p>11 Q. I'm going to hand you what I'll mark as 12 Exhibit 4. And this is a text exchange. I'll tell 13 you, it's between Lisa Jennings and Carl, where she 14 said -- and it's dated March 19th, and she says, 15 "We're going to cancel the April 18th fundraiser. 16 Jesse is off until mid April," which I assume is a 17 reference to your vacation --</p> <p>18 A. Um-hmm.</p> <p>19 Q. -- you were just telling me about, right?</p> <p>20 A. Yes.</p> <p>21 Q. All right. And the reason that APV 22 canceled a fundraiser is because it knew that Ms. 23 Bonar was considering doing something with these -- 24 with her allegations, right?</p> <p>25 A. That's my understanding, but I think Lisa</p> <p style="text-align: center;">Jessica Johnson - October 24, 2018 Examination by Mr. Loman 39</p>	<p style="text-align: right;">40</p> <p>1 Q. Okay. If I understood your testimony 2 earlier, at this point, as you're reviewing this 3 Word document on the morning of May 1st, you had not 4 seen the open letter?</p> <p>5 A. Correct.</p> <p>6 Q. Is that right?</p> <p>7 A. Yes.</p> <p>8 Q. Okay. It seems to me that Lisa Jennings 9 probably had. Do you know whether she had seen the 10 open letter at this point?</p> <p>11 A. I do not.</p> <p>12 Q. All right. Your first -- do you need to 13 take a break?</p> <p>14 A. No. I just keep kicking the court 15 reporter under the table accidentally. I might need 16 a break soon.</p> <p>17 MR. LOMAN: We can take five right 18 now if you want.</p> <p>19 THE WITNESS: That would be great. 20 Thank you.</p> <p>21 (Recess was taken from 10:57 a.m. until 11:01 a.m.)</p> <p>22 Q. So we were discussing Exhibit 5. So your 23 first comment here -- and this is you talking with 24 Lisa Jennings, right? "I think it should just be 25 you, Lisa - not me. Because I haven't been involved</p> <p style="text-align: center;">Jessica Johnson - October 24, 2018 Examination by Mr. Loman 41</p>

41	<p>1 in the decision-making discussions and I haven't 2 actually spoken to Laura about this matter in any 3 detail since she requested our endorsement 4 withdrawal." 5 So I'm trying to understand what you're 6 saying there. Do you mean just in the last couple 7 of weeks -- by that point, she had told you the 8 details, right? 9 A. She had told me some, but this was prior 10 to our evening of the May 1st phone conversation. 11 And so for full context on that comment -- and I 12 think I talked about my conversations with Lisa in 13 January of 2018, where Lisa had indicated that she 14 had at least some knowledge of what had happened to 15 Laura, what Carl had done. 16 And I remember saying, "Well, you know, 17 I'd really like to be -- if there's further 18 conversations between you two about what to do, I'd 19 like to be involved in those conversations." 20 And then the legislative session started, 21 and we focused on that. And then the bill passed, 22 and we focused on lobbying the governor. And then 23 like two or three days after the governor vetoed our 24 bill, I was -- I left on my vacation. 25 When I came back to work, I think it was Jessica Johnson - October 24, 2018 Examination by Mr. Loman 42</p>	43	<p>1 us. 2 A. Um-hmm. 3 Q. Who is Kelsey Martin? 4 A. She is someone that we had been working 5 with to plan a fundraiser for the Speakers Fund for 6 House Speaker Brian Egolf. 7 Q. Kelsey is a fundraiser for Brian Egolf, 8 right? 9 A. She's some staff person for Brian Egolf, 10 is my understanding. 11 Q. Okay. Do you know what Blue Advantage 12 Partners is? 13 A. No, not -- not completely. 14 Q. Okay. 15 A. I imagine it's some firm that does work 16 for Democratic candidates. 17 Q. Okay. That was a guess, though? 18 A. That was my assumption at the time. I 19 didn't think too much about it because she was the 20 person that got in touch with us about planning a 21 fundraiser for Brian Egolf. 22 Q. Okay. So I don't want to put words in 23 your mouth, so I want to make sure. Is it fair to 24 say that during this e-mail exchange you had on May 25 2nd, you understood that she was a point of contact Jessica Johnson - October 24, 2018 Examination by Mr. Loman 44</p>
42	<p>1 Wednesday of my first week back in mid-April, Lisa 2 informed me that some stuff had happened, and we -- 3 she had pretty much decided we weren't going to -- 4 the organization wasn't going to support Carl 5 anymore and that it sounded like Laura was 6 considering going public. 7 And at that point -- so between that point 8 and the evening of May 1st, Laura and I didn't 9 really talk about it. I think -- you know, for 10 whatever reason, she just wasn't wanting to share a 11 lot of details with me. And I didn't really pry. 12 And so at this point and this comment, I'm 13 feeling a little like: What the heck? And like, 14 you know, I don't feel like I know exactly what's 15 going on, and so I don't want to be somebody 16 responsible for fielding questions about what's 17 going on. 18 In response to this comment, I think Lisa 19 talked to Laura, which prompted Laura to call me 20 that evening. And that's when we had the long 21 conversation that I had previously mentioned that 22 happened on the evening of May 1st. 23 (Exhibit 6 Marked for Identification.) 24 Q. I'm going to hand you what I've marked as 25 Exhibit 6. This is an e-mail that you provided to Jessica Johnson - October 24, 2018 Examination by Mr. Loman 43</p>	44	<p>1 for you for Brian Egolf? 2 A. That was my understanding at the time. 3 Q. Okay. And you got this e-mail from her. 4 Had you had previous communications with her about 5 Brian Egolf? 6 A. You know, there was -- at some point -- I 7 can't recall if it was her. At some point in 2017, 8 someone on behalf of Speaker Egolf reached out to us 9 to see if we would hold a fundraiser to benefit the 10 Speakers Fund, and we agreed. And at some point, we 11 had chosen the date of May 3rd. And at least since 12 the beginning of 2018, Kelsey Martin was the point 13 of contact on planning that event. 14 Q. So you get this e-mail from her on May 15 2nd, 11:43 a.m., right? 16 A. Um-hmm, yes. 17 Q. Yes. Where they tell you that they read 18 the statement from Ms. Bonar, and, "The Speaker will 19 be releasing a statement calling for an 20 investigation," right? 21 A. Yes. 22 Q. Did you have any conversations with Kelsey 23 Martin about this issue beyond this e-mail? 24 A. No. 25 Q. Have you ever discussed Carl Trujillo with Jessica Johnson - October 24, 2018 Examination by Mr. Loman 45</p>

<p style="text-align: right;">45</p> <p>1 Brian Egolf? 2 A. I had recently run into him at an event 3 and didn't talk about it in detail. I sort of just 4 said, "Oh, it's been an interesting year." And he 5 sort of nodded, and that was basically the extent of 6 it. 7 Q. Okay. And that's the only time you've 8 ever spoken to Brian Egolf about Carl Trujillo? 9 A. That I recall, yes. 10 Q. Do you recall having a phone conversation 11 with Carl Trujillo in January of this year where you 12 talked about kind of giving him a heads-up that some 13 politics were afoot with him? Do you remember 14 any -- do you remember that conversation? 15 A. I know that I've had at least one 16 conversation with him of that nature, but I can't 17 remember the time. 18 Q. Do you remember the year? 19 Well, let me ask it this way: Could it 20 have been in January of this year? 21 A. I think it's less likely that it happened 22 in January than in 2017. 23 Q. Okay. 24 A. Because I think in January 2018, I'm very 25 focused on the session, and I'm not really <p style="text-align: center;">Jessica Johnson - October 24, 2018 Examination by Mr. Loman 46</p></p>	<p style="text-align: right;">47</p> <p>1 Q. I hand you what I've marked as Exhibit 7. 2 And actually the first page -- we'll leave it 3 attached, but the first page is the same as the 4 second page? 5 A. Okay. 6 Q. The second page is just a better copy -- 7 better version of it. 8 A. Um-hmm. 9 Q. Because it took me a couple of attempts to 10 get this to print out in a legible way. 11 And behind that is a U.S. News article 12 that you attached and shared on Twitter, right? 13 A. It appears so. 14 Q. All right. Why did you share this on 15 Twitter. 16 A. I don't know. 17 Q. Okay. And back to Exhibit 7, and you 18 shared this on May 8, 2018, right? 19 A. Um-hmm. 20 Q. Is that a yes? 21 A. Yes. 22 Q. Thank you. All right. And this is 23 Exhibit 8. 24 (Exhibit 8 Marked for Identification.) 25 Q. Which is another post that you put on <p style="text-align: center;">Jessica Johnson - October 24, 2018 Examination by Mr. Loman 48</p></p>
<p style="text-align: right;">46</p> <p>1 thinking -- usually not really thinking about 2 elections at that point. 3 Q. Okay. Well, tell me about the 4 conversation that you did have, whenever it may have 5 occurred. 6 A. I can't recall who -- who brought it up 7 first, if it was me or Carl, but I remember talking 8 about how there was some rumblings that maybe there 9 was going to be a primary opponent that was being 10 organized by the, quote/unquote, progressives. 11 And he told me about a poll that was being 12 conducted by, we presumed, one of the groups that 13 was looking to unseat Carl. And he told me that he 14 knew about the poll because he had received the poll 15 himself as a member of his own district. I remember 16 that he told me that in the poll, that one of the 17 poll questions -- the poll questions were comparing 18 people's feelings about him versus David Coss. 19 So we were surmising whether or not it was 20 David Coss that might actually run against him or if 21 it was someone else. I wasn't aware of any other 22 names, and I said that to the extent that I could, I 23 would keep him updated if I heard anything that 24 could help him. 25 (Exhibit 7 Marked for Identification.) <p style="text-align: center;">Jessica Johnson - October 24, 2018 Examination by Mr. Loman 47</p></p>	<p style="text-align: right;">48</p> <p>1 Twitter on May 23, 2018, right? 2 A. Yes. 3 Q. And you live in Carl's district, I 4 understand? 5 A. Yes. 6 Q. So you were getting these mailers yourself 7 in your mailbox? 8 A. Yes. 9 Q. Tell me why you posted this on Twitter. 10 A. I don't know. I mean, I presume anytime I 11 tweet anything, it's because I want someone to see 12 it, to read it. 13 Q. How many followers do you have on Twitter? 14 A. I don't know. 15 Q. I think it's 2700. Does that sound about 16 right? 17 A. Maybe. I'm not a huge Twitter person at 18 this point. 19 Q. Okay. 20 A. There was a time in my life when I could 21 have told you right away how many Twitter followers 22 I have, but that time has passed. 23 Q. Have you ever been sexually harassed in 24 the legislature or by anyone around the legislature? 25 A. Not that I'm aware of. <p style="text-align: center;">Jessica Johnson - October 24, 2018 Examination by Mr. Loman 49</p></p>

<p style="text-align: right;">49</p> <p>1 Q. Okay.</p> <p>2 MR. LOMAN: Let's take a break.</p> <p>3 (Recess was taken from 11:15 a.m. until 11:23 a.m.)</p> <p>4 Q. Who is Judy Calman?</p> <p>5 A. She is a friend of mine. She works for</p> <p>6 the New Mexico Wilderness Alliance.</p> <p>7 Q. Okay. And do you recall sending a text</p> <p>8 message to Tom about her?</p> <p>9 A. Yes.</p> <p>10 Q. What was that about?</p> <p>11 A. That was -- I was responding to his line</p> <p>12 of questioning about whether or not I'd heard anyone</p> <p>13 else in particular have any weird experiences with</p> <p>14 Carl.</p> <p>15 Q. And so why did you give him that name?</p> <p>16 A. Because I remembered it would have been in</p> <p>17 October of 2017, because the -- you know, again, the</p> <p>18 Me Too movement was happening. We were celebrating</p> <p>19 my birthday, and Judy came. And over some drinks,</p> <p>20 we were kind of talking about, you know, "Oh, if</p> <p>21 someone -- you know, if someone in the New Mexico</p> <p>22 legislature got busted, who might it be?"</p> <p>23 So we were just naming off any legislators</p> <p>24 that we'd had creepy experiences with or had heard</p> <p>25 were creepy, and I -- so during that conversation,</p> <p style="text-align: center;">Jessica Johnson - October 24, 2018</p> <p style="text-align: right;">Examination by Mr. Loman 50</p>	<p style="text-align: right;">51</p> <p>1 Q. Okay. But it would have been sometime</p> <p>2 around your birthday?</p> <p>3 A. Yeah, October 2017.</p> <p>4 Q. In 2017?</p> <p>5 A. Yeah.</p> <p>6 Q. Okay. That's the only reason you</p> <p>7 remember, it was around your birthday.</p> <p>8 Did Laura Bonar ever tell you at any point</p> <p>9 that she feared for her personal safety because of</p> <p>10 Carl Trujillo?</p> <p>11 A. We have talked about it in the context of</p> <p>12 talking about the escalation of behavior that's</p> <p>13 often seen in perpetrators and that -- especially</p> <p>14 once something crosses the line to touching, then</p> <p>15 it's -- it's quite possible that it could turn into</p> <p>16 something more forceful and violent.</p> <p>17 Q. Okay. And that's speaking very generally.</p> <p>18 What I'm asking is: Did she ever tell you that she</p> <p>19 was fearful for her personal safety? In other</p> <p>20 words, that she thought Carl Trujillo was going to</p> <p>21 physically harm her somehow?</p> <p>22 A. I can't remember the words that she used,</p> <p>23 but I believe that I remember that she has indicated</p> <p>24 to me that she felt like Carl might hurt her.</p> <p>25 Q. Okay. When would that have been? When</p> <p style="text-align: center;">Jessica Johnson - October 24, 2018</p> <p style="text-align: right;">Examination by Mr. Loman 52</p>
<p style="text-align: right;">50</p> <p>1 Judy told me that she was, at some point previous to</p> <p>2 that, in the Roundhouse circulating a sign-on letter</p> <p>3 and asking legislators to sign it. And she told me</p> <p>4 that when she had approached Carl to ask him to sign</p> <p>5 it, he responded with something like, "Well, only</p> <p>6 because you have a pretty smile," or something like</p> <p>7 that.</p> <p>8 So I remembered that story when talking to</p> <p>9 Special Counsel during the investigation process,</p> <p>10 and so as follow up to that, he asked if he could</p> <p>11 get in touch with her.</p> <p>12 Q. Okay. Do you know if he did?</p> <p>13 A. I think he did. I think he told me he</p> <p>14 did.</p> <p>15 Q. Okay. When is your birthday?</p> <p>16 A. October 15th, the morning that I got the</p> <p>17 Interrogatories.</p> <p>18 Q. Well, happy birthday.</p> <p>19 A. Thank you.</p> <p>20 Q. Hope you enjoyed that.</p> <p>21 A. It was fun.</p> <p>22 Q. So would this have been October 15, 2017,</p> <p>23 then, that you had this?</p> <p>24 A. It was around that date. I can't remember</p> <p>25 right now if --</p> <p style="text-align: center;">Jessica Johnson - October 24, 2018</p> <p style="text-align: right;">Examination by Mr. Loman 51</p>	<p style="text-align: right;">52</p> <p>1 did she tell you that?</p> <p>2 A. I don't recall exactly.</p> <p>3 Q. She did describe for you the incident in</p> <p>4 the Roundhouse where he pulled her aside and said,</p> <p>5 "When can we meet," and then -- this is the incident</p> <p>6 you described, right?</p> <p>7 A. Yes.</p> <p>8 Q. Okay. Did she tell you what she said in</p> <p>9 response to, "When can we meet"?</p> <p>10 A. No, not that I remember.</p> <p>11 Q. And I don't think you said that earlier --</p> <p>12 I mean, I don't think you told me earlier. So --</p> <p>13 but you did say that Ms. Bonar told you that Carl</p> <p>14 then -- I think you used the word stormed off or got</p> <p>15 angry and stormed off, something like that. Is that</p> <p>16 what she described?</p> <p>17 A. So she hasn't -- she has told me those two</p> <p>18 things separately, and I don't believe she's told me</p> <p>19 that sequentially. So I --</p> <p>20 Q. I'm sorry, what two things?</p> <p>21 A. The pulling aside and asking to meet and</p> <p>22 the storming off angrily.</p> <p>23 Q. Oh, I see.</p> <p>24 A. I don't know that when she said to me he</p> <p>25 stormed off, that she was talking about that</p> <p style="text-align: center;">Jessica Johnson - October 24, 2018</p> <p style="text-align: right;">Examination by Mr. Loman 53</p>

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1 incident.

2 Q. Okay, good, thank you. So --

3 All right. Are you aware of any other

4 interactions she had with him, then, where he

5 stormed off angrily or where they had some sort of

6 tense moment or altercation where that would have

7 happened?

8 A. I haven't heard any other stories, other

9 than what I've already relayed.

10 Q. Okay. I will tell you that she has

11 described this incident of pulling her aside in the

12 Roundhouse as occurring in February of 2014. Okay?

13 A. All right.

14 Q. Are you aware of any encounters that Carl

15 and Ms. Bonar had had since then, after that?

16 A. I'm not aware of any actual encounters.

17 In December of 2017, Laura came to our -- I believe

18 it was December 2017, and that's what I put in my

19 Interrogatory answers. Laura came to our Santa Fe

20 office to attend a donor appreciation party, and

21 when she arrived, she came into my office. And the

22 start of the party hadn't arrived, the party hadn't

23 begun, and I remember telling her like, "Oh, just so

24 you know" -- I think it was in that moment that I

25 told her, "Just so you know, Carl's going to be

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1 here".

2 And then -- so they were in the same

3 building that night. Her response to me when I told

4 her that, aside from telling me more about the

5 details, as I indicated previously, was to say,

6 "Well, I'll just try to stay on the opposite side of

7 the room from him." And so that night, I did not

8 see them interact.

9 Q. Your office is in Santa Fe?

10 A. We have an office in Santa Fe and in

11 Albuquerque.

12 Q. But I mean your personal office?

13 A. I primarily work out of Santa Fe, yes.

14 Q. And Laura primarily works in Albuquerque;

15 is that right?

16 A. That's correct.

17 Q. And she lives in Albuquerque?

18 A. Yes.

19 Q. So normally, when someone provides

20 responses to Interrogatories, they sign a

21 verification, just verifying that their answers have

22 been truthful and accurate and signed under oath.

23 Would you please sign that for me today?

24 A. Yes.

25 Q. Let me get a notary in here.

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1 MR. LOMAN: Thank you.

2 Q. And I'll tell you, I just looked it up.

3 It looks like you have 2,787 Twitter followers.

4 Does that sound about right?

5 A. Sure.

6 Q. More than I have. You've got quite a bit.

7 A. They're not -- yeah. There's like an

8 app -- again, there was a time where I cared about

9 trying to build my Twitter following, and there is

10 an app that you can use to like follow a bunch of

11 people to see if they follow you back. That's the

12 only way I got -- there's maybe two people that are

13 interested in my tweets.

14 Q. I like the want-to-be celebrities that try

15 to buy followers.

16 A. Yeah. I'm practically Beyoncé.

17 MR. LOMAN: I think those are all the

18 questions I have for you.

19 THE WITNESS: Okay.

20 MR. HNASKO: We'll reserve our

21 questions for the hearing.

22 You have the right to read and sign the

23 deposition and make any changes to it that you deem

24 necessary or related to improper transcription or

25 any errors --

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1 THE WITNESS: Okay.

2 MR. HNASKO: -- and review. And the

3 court reporter will contact you for that. She can

4 do that through me. That would be easier.

5 (The proceedings concluded at 11:33 a.m.)

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1 STATE OF NEW MEXICO)
2)

3 COUNTY OF BERNALILLO)
4 REPORTER'S CERTIFICATE

5 BE IT KNOWN that the foregoing transcript
6 of proceedings was taken by me; that I was then and
7 there a Certified Court Reporter and Notary Public
8 in and for the County of Bernalillo, State of New
9 Mexico, and by virtue thereof, authorized to
10 administer an oath; that the witness before
11 testifying was duly sworn by me; that the foregoing
12 pages contain a true and accurate transcript of the
13 proceedings, all to the best of my skill and
14 ability.

15 BE IT FURTHER KNOWN THAT examination of
16 this transcript and signature of the witness was
17 requested by the witness and all parties present.

18 On _____, a letter was mailed or delivered to
19 _____ regarding obtaining signature of the
20 witness.

21 I FURTHER CERTIFY that I am not related
22 to nor employed by any of the parties hereto, and
23 have no interest in the outcome hereof.

24 DATED at Albuquerque, New Mexico this
25 _____, 2018.



Kendra D. Tellez
License Expires: 12/31/18
CRR-RMR

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1 IN RE: CARL TRUJILLO
2 DEPONENT SIGNATURE/CORRECTION PAGE

3 If there are any typographical errors to
4 your deposition, indicate them below:

5 PAGE LINE

6 _____ Change to _____

7 _____ Change to _____

8 _____ Change to _____

9 _____ Change to _____

10 Any other changes to your deposition are
11 to be listed below with a statement as to the reason
12 for such change.

13 PAGE LINE CORRECTION REASON FOR CHANGE

14 _____

15 _____

16 _____

17 _____

18 I, JESSICA JOHNSON, do hereby certify that I
19 have read the foregoing transcript of my testimony
20 on _____ and it is a true and correct
21 record of my testimony given at that time, except as
22 to any corrections submitted.

23 _____
24 DATE SIGNED JESSICA JOHNSON