

1 A Yes, that's my signature, definitely.

2 Q And what is the date?

3 A The date is October 29, 1997.

4 Q And if you can just refresh your recollection and
5 let me know whether or not that statement was a true and
6 accurate statement at the time that you signed it?

7 A Yes.

8 Q Did anyone help you prepare this document?

9 A No.

10 Q Can you tell me a little bit about the issues
11 surrounding the basis for this affidavit?

12 A Yeah. There was, when Jeff was hired in 1996,
13 basically the date that I've seen there because that issue
14 would have come up later, this Anna Perez had shown up at
15 the radio station, and just showed up and suddenly had a
16 desk job, you know, a desk. And so I was wondering who is
17 that person and I asked Jeff, and he said that's Anna Perez,
18 she's the new program manager. I said there's a new program
19 -- how did that -- and he said, well, there was a job
20 opening for program manager and she was hired. So, I was a
21 little curious as to why there was no notice of the job
22 posted or -- nobody was notified about the job and it was
23 very curious to me because I would certainly have been
24 interested, since usually in the jobs I have I don't like to
25 sit for very long, I like to move and grow a little bit,

1 instead of just announcing every day, you know. I could do
2 what I was doing and certainly more than that, and probably
3 doing some of the duties of what a program manager would do
4 as far as making new programs and all of that. So, I was
5 not too pleased when she showed up and there wasn't a really
6 good explanation for how she got there. So, I started
7 inquiries at that time on my own to sort of see how that
8 process went.

9 Q And who did you make inquiries of?

10 A I went downtown to Classified, and asked them, and
11 I was wondering when and where the job was posted, and they
12 couldn't really give me a clear definition of that. They
13 said, I think, it was posted maybe downtown perhaps, but
14 nobody could really prove that to me, and it just seemed
15 like it was an inside hire basically. And I was not too
16 pleased about that because I was certainly interested in
17 advancing within the radio station and I felt that EEO
18 certainly had some encouragement for people to be advanced
19 from within, so I wasn't too happy about that. And when I
20 asked Jeff about that he just said, you know, it was an
21 irregular hire.

22 Q He said that it was an irregular hire?

23 A Yeah, he just said, you know, kind of that's what
24 I kind of have to do and he just kind of shrugged his
25 shoulders. And he later denied that.

1 Q Was he the person who actually hired Anna Perez?

2 A Yes and no. I mean Jeff was, you know, Jeff was
3 hired by a person above him, Enrique Palacios, and I think
4 it was pretty much kind of the thing of where the supervisor
5 says this person is going to work at the radio station, you
6 know, we have this job opening, let's create a job, here's a
7 job title.

8 Q So, you think Mr. Palacios had some influence in
9 bringing Anna Perez --

10 A He does have influence on, yes.

11 Q What was your intent in filing this declaration or
12 creating this declaration for filing with the Petition to
13 Deny?

14 A I wanted to be on record, I wanted to be on record
15 on some, you know, hiring, some mishandling of the radio
16 station. I thought if they wanted to -- look, and I know
17 that there's political hires all the time, this stuff
18 happens, it's a city, you know, it's a city bureaucracy,
19 that stuff happens but, they didn't even both at that time
20 to dot their 'i's or cross the 't's at all, and to this day
21 I couldn't even prove that she was ever interviewed for the
22 job, because nobody could show me anything on that. So, I
23 was not happy about that. And plus I was, you know, there
24 was some retaliation on my part for filing the complaint.

25 Q What do you mean by that?

1 A Well, I filed a complaint with, you know, with
2 Classified, I just told them this is not right and I really
3 wanted to know, and I launched an investigation. I asked
4 someone to investigate the process and so it's clear
5 probably it kind of rattled somebody, at least put it
6 officially on notice. And so Enrique was not happy about
7 that. So, at a certain point they -- oh, I was doing a
8 daily program so that daily program was canceled and I was
9 put on weekend openings, showing up at the radio station at
10 6:00 a.m. and stuff like this. So, that kind of, I felt
11 like I wasn't treated very well.

12 Q So, your shifts changed as a result of your
13 requesting or demanding an investigation into the hiring
14 practices?

15 A (No audible response.)

16 Q Is that a yes or a no?

17 A That's a yes.

18 Q Okay, thank you.

19 A I believe that's what happened.

20 Q You mentioned that Mr. Ramirez had admitted to you
21 at one point, or stated to you that the hiring of Anna Perez
22 was irregular and then you said he changed his statement at
23 a later time. Could you give me some background and details
24 regarding that?

25 A Well, I walked into Jeff's office and asked him

1 what, you know, what's the deal. Jeff, why is this person
2 here and why was there not any notice about it? He just
3 said, look, that's, you know, he realizes it was not a, you
4 know, a regular thing, it wasn't, you know, by the book.
5 But, later when that was presented, he denied ever having
6 said that.

7 Q When did he make this statement and let you --

8 A To me directly in the office, probably, you know,
9 shortly before that time and shortly after the time that
10 Anna was hired, because I went in and asked him directly
11 about the hire and what was going on. This is before I
12 launched into taking it a little bit deeper.

13 Q So, in response to your immediate request for
14 information or your own information gathering, he gave you
15 what you deemed to be a candid answer?

16 A Yes.

17 Q And at what time did he change his statement?

18 A This came up later on, I think when stuff started,
19 you know, being put to paper, you know, I had noticed
20 somewhere in there, and I think this is probably during the
21 investigation period of this and I'm not sure where the
22 paper trail for that is, at that time he denied ever
23 speaking with me about that or saying it.

24 Q Who conducted the investigation?

25 A Adad is his last name, he worked for the

1 Superintendent at that time.

2 Q And who was the Superintendent at that time?

3 A I believe it was Rojas, Baldomar Rojas.

4 Q Do you ever know what came of the paper associated
5 with that report?

6 A No. Basically I think they sent me a letter
7 saying that my claim had no validity.

8 Q So, it was shelved?

9 A Basically. I mean it was, you know, the
10 Superintendent's office that was investigating it and this
11 is the person who had, at that time, you know, kind of
12 started some of this or at least initiated, I thought, some
13 of the problematic transactions that Enrique Palacios was
14 certainly part of that. So, I didn't really -- I don't know
15 what I expected but I at least wanted to be on record.

16 Q What was the relationship, you've mentioned that
17 Mr. Palacios hired Mr. Ramirez, what was the relationship
18 between Mr. Palacios and Mr. Rojas, and Mr. Rojas and
19 Mr. Ramirez?

20 A Probably from Jeff Ramirez to Rojas there probably
21 would be no contact whatsoever. Enrique Palacios was in
22 charge of different departments, I think he was in charge of
23 food distribution, you know, cafeteria stuff, KALW Radio
24 Station and a few other things, usually someone who was, you
25 know, close to the Superintendent would have several things,

1 you know, assigned to them. I can't even tell you what
2 Enrique's role was, but I know that he was pretty much
3 Rojas' right hand man, because he came with him, I believe
4 from New York.

5 Q And do you know when Mr. Palacios left the station
6 or left the School District?

7 A That would have been during 1997 or the early part
8 of 1998.

9 Q Do you know why he left?

10 A Change of administration.

11 Q And how about Mr. Rojas?

12 A And actually, no, he stayed on a little bit
13 afterwards and I can't remember when Rojas left.

14 Q Okay. Based on your dealings with Mr. Ramirez
15 were you aware of any other instances in which he had stated
16 a position at one time and then changed it at a later date?

17 A No.

18 Q Based on your experience with him, what would you
19 say his reputation for honesty and truthfulness was?

20 A Well, I guess it would be qualified by how much he
21 wanted to keep his job. I mean he was a young person,
22 thirty years old, youngest person at the radio station, as I
23 think I stated before, and this was his first big job in
24 radio. So, I think that he was probably, you know, and
25 that's completely my own opinion but, he was probably

1 willing to do whatever he was told basically, even if that
2 meant some things that weren't so great, like my little
3 hiring, you know, change and all of that. Actually, that
4 came directly from Enrique Palacios when that happened.
5 But, let's say Jeff was fairly malleable, honest, I don't
6 think he had time to be honest. I mean it's a kind of a
7 tricky situation, he gets hired by somebody so he's going to
8 do what he says, it's his first big job in radio. So, I
9 believe that's what the situation was.

10 Q So, he may have been influenced by others?

11 A Yeah. But, at the same time, you know, he had the
12 job of being the GM and the job of making a lot of
13 decisions, and could have, you know, could have made these
14 decisions, some decisions on his own, or at least had the
15 capability to make decisions on his own.

16 Q What happened after Mr. Ramirez left?

17 A There was an interim period, a number of months in
18 which the person who headed up supervising KALW changed from
19 being Enrique Palacios to I believe it was Ruben Bouche, who
20 followed Enrique.

21 Q And do you know why Mr. Ramirez left the station?

22 A Why Jeff left the station? I think he was tired,
23 tired of it. I think it was of his opinion, what we had
24 heard, that he was stating that the district wasn't really
25 interested in doing anything, you know, actually letting him

1 manage the station or doing anything new and different with
2 the station. And I think he had some other job prospects
3 too.

4 Q Did you take over as general manager immediately
5 upon Mr. Ramirez's departure?

6 A No. There was a small interim period in which
7 Bill Helgeson took over as the interim manager.

8 Q And what kind of time frame would that have been?

9 A Oh, it wasn't that long. A couple months maybe.

10 Q When did you assume the position of general
11 manager?

12 A It was in 1998, I couldn't tell you the exact
13 month though.

14 Q And who hired you into that position?

15 A Ruben Bouche.

16 Q So, Mr. Helgeson was the acting GM prior to your
17 hiring some time in the pre-1998 when you started?

18 A Yes. He's always the default GM, because he's
19 permanent. GM's may come and GM's may go but Bill remains.

20 Q Did Mr. Helgeson, at anytime during his acting,
21 his interim acting GM position, ever ask you for information
22 regarding the renewal application?

23 A No.

24 Q Do you know if he asked anybody else for
25 information?

1 A I couldn't tell you.

2 Q What kind of relationship did you have with
3 Mr. Helgeson?

4 A It was generally good, generally he was, you know,
5 a semi-jovial person, at least kind of slightly sarcastic,
6 would be not the most unpleasant person to work with, but
7 you had to deal with him every day, he was the office
8 manager. He ran the station in essence.

9 Q So, you had regular contact with him?

10 A Every day.

11 Q And what happened when you became GM, how did he
12 fit into the structure?

13 A Well, he was, you know, now my subordinate, he was
14 the -- I think while Jeff was there Bill became a program
15 manager, and I think he went from being a, I believe it was
16 a senior clerk typist to program manager. That may have
17 happened during Jeff's or slightly previous to that. So,
18 Bill was the program manager and above that is the GM, so.

19 Q And what were his functions, as you understood
20 them as a program manager?

21 A Well, he was pretty much the office manager.

22 Q And what would that entail?

23 A That would entail all of the paperwork that runs
24 between the station and SFUSD, he would know where to take
25 it, know how to run things through the system.

1 Q What was his relationship, his working
2 relationship with Mr. Ramirez?

3 A I think it was pretty good. I mean, you know,
4 Jeff I think kind of, you know, realized that Bill, you
5 know, holds a lot of the knowledge on how the place worked,
6 as far as paperwork and all of that, so I believe that their
7 relationship was okay.

8 Q Do you think Mr. Ramirez would have relied on Mr.
9 Helgeson?

10 A He had to, anybody who comes in has to rely on
11 Bill.

12 Q And rely on him in terms of?

13 A Everything.

14 Q Like?

15 A Paperwork, you know, knowing who to, you know, how
16 to draw something up, what forms to use, you know, who is
17 the person in budget, who is the person in payroll, you
18 know, if you want this, the forms you have to fill out and
19 what desk you have to take it to, if you need to expedite it
20 what desk do you really take it to, you know, those sorts of
21 things like that. Bill did all of that. Bill knows the
22 system, knows the system quite well.

23 Q And when you were the general manager, did he
24 perform his function competently in terms of processing
25 paperwork?

1 A No.

2 Q Can you give me an example?

3 A Yeah. We wanted to hire somebody from the front
4 office to be at the desk because there was lots of people
5 that would come and go and telephones ringing and all of
6 that. And we had some money to hire a clerk, basically.
7 And so we did it by the book, you know, put in the notice.
8 We had a lot of people come in, we kept records of the
9 interviews, the evaluations of them, all of that. And I was
10 going to do it by the book because before I felt like it
11 wasn't done by the book, so I was going to be sure and do it
12 all by the book, and we made a hire of a person. And Bill
13 had a friend who he actually was sort of pushing for, for
14 that job position, but we didn't hire that person, we hired
15 this other person instead. And Bill should have, at that
16 point, I asked Bill to draw up the paperwork and to get it
17 all kind of ready, but the paperwork was sat on, he sat on
18 the paperwork.

19 Q So, whose paperwork did he sit on?

20 A This person would have been -- the paperwork that
21 I would have asked him to initiate for the hire of this Levi
22 Baldwin.

23 Q Levi Baldwin was the person you wanted to hire?

24 A The person I hired.

25 Q That you actually did hire?

1 A Yes.

2 Q And in terms of getting him on the payroll --

3 A Yes.

4 Q -- Mr. Helgeson would have had to process his
5 paperwork?

6 A Yes. And also have filled out a requisition, a
7 K-res or whatever they call it, take it downtown, get the
8 amount approved, so that we have that X amount sort of, you
9 know, allotted for the budget so that the person could be
10 paid. For that year, you know, Levi would be paid whatever
11 it is, \$25,000 for his time there, so we had to go and allot
12 \$25,000 out of the budget from the School Board, fill out
13 the forms, we present it to the School Board, the School
14 Board, you know, yea or ney's it and then we're in action.

15 Q And how do you know that he had a friend who was
16 interested in that position?

17 A He was pretty clear about it. I mean -- yeah, he
18 was favoring this other gentleman.

19 Q And what happened when the paperwork -- did Mr.,
20 what was his last name?

21 A Baldwin.

22 Q Baldwin, did Mr. Baldwin actually start working?

23 A Yeah, because we really needed somebody there and
24 I was assuming that the work was -- that the paperwork was
25 being processed. So, I paid him out of my pocket and had an

1 invoice with the idea that I would be reimbursed for that
2 amount.

3 Q How long a period were you paying his salary?

4 A For a few months.

5 Q And what happened with the paperwork?

6 A Well, I asked Bill again, like what is going on
7 with this paperwork and he claimed I told him to hold onto
8 it, which I never did. And it had been sitting on his desk
9 the whole time when he knew, very well, that this person
10 needed to be paid.

11 Q Had he seen Mr. Baldwin show up at work?

12 A Oh yes, yes, yeah, Levi was there every day at
13 work and he was involved in all the workings at the radio
14 station.

15 Q So, he would have been directed by Mr. Helgeson?

16 A Oh yeah, talked to him every day, yeah.

17 Q And as a result of the paperwork not getting
18 processed?

19 A I had a lot of out of pocket cost.

20 Q Did you ever get that reimbursed?

21 A Well, it was a funny thing that happened.

22 Finally, finally the paperwork was processed after I just
23 sort of, you know, blasted Bill about not getting it done
24 and so he finally actually, you know, put it through, it got
25 approved. But, by that time we had to have a budget cut, we

1 had to cut back on the budget, just because there was a lot
2 of budget cuts all through the system, all through the
3 district. So, at that point I had to terminate Levi.

4 Q Oh boy.

5 A And so finally the paperwork had come through and
6 then there was a check to be processed for him, you know,
7 after all of that, a check for the amount written out to him
8 of course, which was to be reimbursed to me somehow. So,
9 that check I left pretty specific instructions about what
10 was to happen to that check, because I didn't want him, you
11 know, he was gone, he was not employed there anymore and he
12 gets a big fat check he's probably going to disappear with
13 it. And so that's what happened actually.

14 Q And to whom was that check made out?

15 A Levi Baldwin.

16 Q Okay.

17 A So, yeah, I wasn't happy about that, the way that
18 things happened with that.

19 Q Were there any other instances that you were aware
20 of with Mr. Helgeson maybe not following your directions or
21 not performing his job duties in a competent manner?

22 A Well, there was a -- and I can't quantify that for
23 sure -- I was trying to order a DSL line and I was having a
24 lot of trouble getting that done, so I'm not sure, I can't
25 say whether Bill was telling people downtown not to do it or

1 whatever, I don't really know.

2 Q But you had asked him to do it --

3 A No. I was trying to order that through myself
4 and, because we had some -- we were trying to get on line
5 access, we were trying to get a website up and we needed a
6 DSL line for the server. And that seemed to be blocked for
7 some reason, it just never went through.

8 Q And you don't know why?

9 A I don't know quite why. And there was other times
10 when I had to kind of come down on Bill. I had hired a
11 couple of other people by that point to be involved at the
12 radio station, Anna Perez, who was there and, you know,
13 albeit our hadn't started in the best place but she was
14 there so we had to work together, so I wanted her to kind
15 of, you know, be my business manager. And another woman,
16 Mary Tilson, to do development there. And so I was trying
17 to really make the place work a little bit more efficiently
18 and that also meant taking some of those duties away from
19 Bill. And I know that he wasn't too happy about that.

20 Q What duties did you leave with Bill?

21 A Office management, that would be coordinating some
22 of the emails that come in, processing payments, credit card
23 payments, and the donations when they came in, running the
24 paperwork still downtown, since he knew the system well
25 enough but, to watch him closely on it, or at least ride him

1 as far as getting those things done. Because he didn't seem
2 to want to do some of it willingly.

3 Q Based on your knowledge of supervising him, what
4 would you say his reputation for character was?

5 A On the surface Bill was a very nice person, you
6 know, a little sarcastic but that was on the surface. I had
7 more problems with him, because he was kind of cited as a
8 problem for the station. And he was seen as a block to the
9 station's progress, at least as far as trying to get some
10 things done as far as just the ability to move things. Now,
11 that can be just, you know, maybe I didn't work with him
12 well, you know, maybe that was just not the best match up
13 and the dynamic of having been his subordinate before and
14 now being his superior was probably, you know, working at
15 each other as well.

16 Q It's a difficult situation sometimes?

17 A Well, I had to come down on him for a few things,
18 you know, like a mysterious email account that was there,
19 that turned out his wife was using his email account, you
20 know, on AOL. Suddenly there was this extra name on AOL and
21 I said Bill, what is this, who is this? Oh, that's my wife,
22 I said no, you have to take her off.

23 Q And was the School District paying for that
24 account?

25 A The School District was paying for the AOL

1 account, yeah. First it was offered free and then you had
2 to pay for it, but then I told him he couldn't really do
3 that anymore, it's just not -- I said it doesn't really cost
4 us anymore but that's not the point.

5 Other instances where I had asked Bill, this is
6 prior to becoming the GM, I had asked Bill for some figures
7 on what it cost to run the cost of printing of the program
8 guide, since I was thinking about ways to streamline that.
9 And so he gave me a sheet for it. And then I think the
10 following year I had asked him for those figures again, to
11 see what the changes were, and I got the sheet and it was
12 basically the same sheet with the dates changed on it. He
13 hadn't really given me anything that actually had the actual
14 costs on it. He had actually given me a sheet that had, it
15 was the same thing but basically changed the year on it.

16 Q And why do you think he would have given you --

17 A Lazy, lazy, laziness. Bill was a CPA, you know,
18 Bill knew a lot of stuff about, you know, he knew how to run
19 the radio station, you know, he knows, knew everything there
20 was to know about the place. But, for whatever reason, he
21 chose to do a lot of shortcuts, and I wasn't really happy
22 with that.

23 Q What was your opinion of his truthfulness and
24 honesty in light of some of the issues you've discussed?

25 A I didn't really trust Bill. I worked with him,

1 you know, still and we had pleasant conversations, if you
2 will, but I was not convinced of his honesty.

3 Q Some of his office management functions, was he
4 responsible for maintaining the Public Inspection File?

5 A That probably would have fallen under his rubric,
6 it certainly was in his area and it was basically right next
7 to where his office was or his office area, so it was within
8 a hand reach of his desk, as far as I remember.

9 Q And what was your involvement, when you were the
10 general manager, what was your involvement in terms of
11 overseeing or being familiar with the Public Inspection
12 File?

13 A You know, I think I might have looked through it
14 once or twice, you know, but I can't really remember doing
15 much with it.

16 Q Do you recall any dates that you might have looked
17 at it?

18 A No.

19 Q Did you take any documents out?

20 A No, no cause to.

21 Q Do you recall the state of the Public Inspection
22 File?

23 A No. A bunch of papers. I mean this was a new
24 thing for me as well, so certainly all of my, you know,
25 braggadocio about Jeff's inexperience certainly got to where

1 I had to put my money where my mouth was, you know, in
2 assuming that position and what not. So, I was, you know,
3 there were things that I was learning as well at that time.
4 And I knew that the Petition to Deny had sort of gone into
5 its process at that point, and really wasn't much that we
6 really knew at that point about what was going on. But,
7 since it was still, I guess, you know, going through the
8 paper mill.

9 Q When you were the general manager, did you
10 yourself create or change any ownership reports?

11 A No, no. What I filed would have had to have been
12 for the Corporation for Public Broadcasting. So, there was
13 some stuff involved with that, so we did have to fill out
14 some -- there's some similar information that goes to them
15 as far as who is the licensee and who has to sign, you know,
16 for this grant that you get from the Corporation for Public
17 Broadcasting, so I signed those.

18 Q Do you recall, during your term as general
19 manager, ever filing any Supplemental Ownership Reports and
20 filing them with the Commission?

21 A No.

22 Q Okay. Do you know if Mr. Helgeson did?

23 A I don't know.

24 Q Did you ever ask him to?

25 A No, I don't believe I did. Not that I can

1 remember, but I don't believe that I did.

2 Q And what about Program Issues Lists, did you ever
3 either create them yourself or direct others to --

4 A During that time?

5 Q Uh-hum.

6 A No.

7 Q Okay. Did you see that as a function of the
8 general manager?

9 A At the time I didn't really, I guess I was
10 becoming aware of all of the responsibilities, so I can't
11 say that that was something that I would have, you know,
12 specifically known was one of the specific things that the
13 GM had to do. I certainly knew that there were things that
14 we had done and things that I wanted the station to do and
15 initiated at the station, because I was more of a
16 programming and producing person rather than say an
17 administrator.

18 Q Did you rely on anybody else in terms of providing
19 a guidance, as to what was required to be in the Public
20 Inspection File or complying with any of the Commission's
21 rules?

22 A I can't say that I do.

23 Q Did you have any outside counsel?

24 A No. I mean there was Ernie Sanchez, who was our
25 legal person in D.C., who we would talk to about various

1 legal things, but I talked to him mostly about other things.
2 But, I don't remember talking to him specifically about the
3 Petition to Deny other than -- I don't remember any
4 specifics.

5 MS. REPP: I would, to the extent that we get into
6 specifics, I would normally ask, I would object to that
7 because we don't want to breach the attorney/client
8 privilege, but you haven't gotten into any specifics so no
9 objection yet.

10 MS. LEAVITT: Right.

11 BY MS. LEAVITT:

12 Q So, in terms of, you know, I can ask you questions
13 about if you talked with him and when you talked with him,
14 but Ms. Repp, you know, because of the attorney/client
15 privilege, would not expect you to disclose any of the
16 contents of the substance of what you discussed with
17 Mr. Sanchez. So, should we get into that area of
18 questioning, she just wants you to be cautious.

19 How often did you contact Mr. Sanchez?

20 A It would come up for various issues, if it was
21 some question of the legality of something. Actually
22 sometimes we wouldn't go to him first, I might call somebody
23 that I knew that dealt with the issues, because it was
24 usually probably around underwriting, so I would probably
25 call someone that I knew that knew about the issues, but not

1 call Ernie because that would cost money.

2 Q Do you recall providing any information to
3 Mr. Sanchez about the Petition to Deny?

4 A No.

5 Q Do you recall providing any information to him
6 about the renewal application?

7 A No.

8 Q Did you instruct anyone on your staff to provide
9 him with information regarding the Petition to Deny?

10 A No, not that I can remember.

11 Q Right. Do you recall directing anyone on your
12 staff to provide him information regarding the renewal
13 application?

14 A Not that I know of. A lot of this had sort of
15 happened prior to my arrival there, there had been, you
16 know, lots of these changes that had taken place, so, you
17 know, the station does, you know, in a strange way often run
18 itself, and so the changing of the guard was the changing of
19 the head, it didn't seem to interfere with how the body
20 worked. So, no, not that I can recall directing anybody for
21 that.

22 Q So, during your tenure, to the extent you were
23 aware of the requirements, who was responsible for
24 maintaining the Public Inspection File?

25 A I guess by default, I mean by duty that would have

1 been the general manager, somewhere between the general
2 manager and the office manager, which would have been me
3 and/or Bill Helgeson.

4 Q And Mr. Sanchez, did he contact you proactively
5 for anything?

6 A No, no.

7 Q Who hired Mr. Sanchez?

8 A That's a good question, I don't know. I don't
9 know who hired him. But, that was certainly the
10 relationship was there before I arrived.

11 Q And how about during your tenure, did his contract
12 ever come up for renewal?

13 A Yes, yes, it did.

14 Q And how did you handle that?

15 A Well, I signed off on it because he was involved
16 with a lot of stuff. At one point I was actually more
17 interested in having a different attorney, because I felt at
18 the time that Mr. Sanchez was not serving the station to its
19 best, to the best of its abilities.

20 Q Was there a specific example that caused you to
21 believe that?

22 A Yeah. I had, by this time I was being supervised
23 by a fellow named Glenston Thompson, one of the grade parade
24 of supervisors, and I had requested some information from
25 Ernie about something, I can't tell you specifically what it

1 was. But then Glenston had requested this information of
2 Ernie as well. And Ernie provided him with the information,
3 full well knowing that I already had the information and I
4 had already requested that from him. And so I was not too
5 happy with the fact that he was sort of doing this separate
6 action and didn't notify this person that this work has
7 already been done. And so that left me with the opinion
8 that he was, he didn't have the station's best interests in
9 heart. He knows a lot of stuff about it, he's cited often
10 as a, you know, as a public radio authority and all of that
11 but, he has to make a buck too.

12 Q So, did you trust him?

13 A I didn't really trust him. I wasn't happy with
14 him, with the fact that he was sort of, I felt sort of
15 trying to go around me at that point, and I had, I think,
16 sort of put this up and I had, you know, made some inquiries
17 about possibly getting another attorney, which he put
18 forward a plea basically around me, directly to my
19 supervisor, saying look, I'm a minority contractor,
20 whatever, you know, I need all these things, you know, let's
21 keep this relationship or something like that. So, I didn't
22 appreciate that, since the people that were sort of on the
23 ground in the radio station and knew kind of what the issues
24 were, at least what we believed we knew the issues were, as
25 far as some of the legal situations that we were dealing