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IN THE SUPERIOR COURT OF THE VIRGIN ISLANDS
DIVISION OF ST. THOMAS AND ST. JOHN

SENATOR ADLAH DONASTORG, Jr.,)
BENEDICTA DONASTORG, ADLAH)
DONASTORG, Sr., JOSEFINA)
DONASTORG, ELLA MORON and NORMA)
DURAN,)

Plaintiff,)

vs.)

Case No. 117/2002

DAILY NEWS PUBLISHING CO. INC.,)
LOWE DAVIS, HOLLAND "DYKE")
REDFIELD, VITELCO and OAKLAND)
BENTA,)

Defendant.)

7 2010

THE ORAL DEPOSITION OF ELIZABETH COGGINS

was taken on the 29th day of December, 2009, at the Law
Offices of Rohn & Carpenter, 1101 King Street,
Christiansted, St. Croix, U.S. Virgin Islands, between the
hours of 2:00 p.m. and 3:07 p.m. pursuant to Notice and
Federal Rules of Civil Procedure.

Reported by:

Cheryl L. Haase
Registered Professional Reporter
Caribbean Scribes, Inc.
2132 Company Street, Suite 3
Christiansted, St. Croix U.S.V.I.
(340) 773-8161

ORIGINAL

APPEARANCES

A-P-P-E-A-R-A-N-C-E-S

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By: Lee J. Rohn

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By: Kevin A. Rames

Also Present:

Adlah Donastorg

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E-X-A-M-I-N-A-T-I-O-N

Description	Counsel	Page
Direct	by Ms. Rohn	4

ELIZABETH GOGGINS -- DIRECT

1 ELIZABETH GOGGINS,

2 Called as a witness, having been first duly sworn,

3 Testified on her oath as follows:

4 DIRECT EXAMINATION

5 BY MS. ROHN:

6 Q. Good afternoon. Can you state your name for the
7 record, please?

8 A. Elizabeth Goggins.

9 Q. Ms. Goggins, where do you reside?

10 A. Sion Farm.

11 Q. Sion?

12 A. Sion Farm.

13 Q. And how long have you lived there?

14 A. Year-and-a-half.

15 Q. And where did you live before that?

16 A. Sion Hill.

17 Q. How long did you live there?

18 A. A year-and-a-half.

19 Q. Where did you live before that?

20 A. Enfield Green.

21 Q. And how long did you live there?

22 A. A year.

23 If you want to sell a house, just let me
24 know. They keep selling the houses I move into.

25 Q. And where did you live before that?

ELIZABETH GOGGINS -- DIRECT

- 1 A. Estate Pearl.
- 2 Q. And how long did you live there?
- 3 A. A year-and-a-half.
- 4 Q. Wow. Okay.
- 5 And where did you live before there?
- 6 A. Prosperity.
- 7 Q. Prosperity?
- 8 A. Uh-huh.
- 9 Q. How long did you live in Prosperity?
- 10 A. Ten years.
- 11 Q. I knew we'd get to the mother load here.
- 12 A. Uh-huh.
- 13 Q. Are you currently employed?
- 14 A. Yes.
- 15 Q. Where are you employed?
- 16 A. Innovative Telephone.
- 17 Q. What is your present position with Innovative
- 18 Telephone?
- 19 A. Environmental health and safety coordinator.
- 20 Q. What are your job responsibilities in that regard?
- 21 A. Compliance issues, training, policy development.
- 22 Q. How long have you held that position?
- 23 A. About ten years.
- 24 Q. And, currently, who do you report to?
- 25 A. I report to Dennis Chance.

ELIZABETH GOGGINS -- DIRECT

1 Q. And what is his position?

2 A. He's vice-president of plant operations and
3 engineering.

4 Q. How long have you reported to Mr. Chance?

5 A. About four or five years.

6 Q. Who did you report to prior to Mr. Chance?

7 A. J'Ada Finch-Sheen.

8 Q. And what was her position with --

9 A. Legal counsel.

10 Q. How long did you report to her?

11 A. About two years.

12 Q. And who did you report to before that?

13 A. Beverly Chongasing.

14 Q. What was her position?

15 A. Vice-president, human resources.

16 Q. Prior to being the coordinator in environmental
17 health and safety, did you --

18 Well, first of all, how long have you worked
19 for Innovative Telephone?

20 A. Eighteen years.

21 Q. So prior to coordinator of environment health and
22 safety, what was your position?

23 A. I was accounting manager.

24 Q. How long were you accounting manager?

25 A. About eight years.

ELIZABETH GOGGINS -- DIRECT

1 Q. So that would take up the full eighteen?

2 A. (Witness nods head.)

3 Q. When you were accounting -- when you were first
4 accounting manager, what were your job responsibilities?

5 A. I did all of accounts payable, did general ledger.
6 Handled aircraft, Atlantic Aircraft paperwork, flight logs,
7 etcetera.

8 Q. And were those your responsibilities the entire
9 time you were accounting manager?

10 A. No. When I first -- when I first started, it was
11 staff accountant, and moved into -- I just did payables when
12 I first started.

13 Q. And then you went into --

14 A. Uh-huh.

15 Q. -- the general ledger --

16 A. Uh-huh.

17 Q. -- and the aircraft?

18 A. Right.

19 Q. Who did you report to, initially?

20 A. Initially, Kevin Hemingway.

21 Q. And what was his position?

22 A. He was -- I don't know. I don't even remember his
23 exact title, because he was a contract employee.

24 Q. How long did you report to him?

25 A. Maybe two years.

ELIZABETH GOGGINS -- DIRECT

1 Q. And then whom did you report to?

2 A. Craig Knock.

3 Q. And what was his position?

4 A. He was CFO.

5 Q. And did you report to him the remaining period of
6 time?

7 A. (Witness nods head.) Well, he left -- he left in
8 January of '98, January-February, and then I reported to
9 Mike Cumbermack for a little while. That was less than a
10 year, because that was at the point where I was switching
11 from --

12 Q. Was there a reason that you went from accounting
13 manager to environmental health and safety coordinator?

14 A. Because Jeff Prosser saw I spent all my time doing
15 environmental work, so he figured he'd put that to good use.

16 Q. What do you mean, you did all your time --

17 A. Well, all my off time. I was very involved in
18 environmental issues and things, and so he had some projects
19 coming up that he wanted my help on.

20 Q. And so did he recommend that you be transferred?

21 A. (Witness nods head.)

22 Q. Were you ever a board member?

23 MR. RAMES: Excuse me. Did you answer?

24 THE WITNESS: Yes.

25 Oh, I'm sorry.

ELIZABETH GOGGINS -- DIRECT

1 MS. ROHN: She said yes.

2 MR. RAMES: Please answer verbally, okay?

3 THE WITNESS: Yes. Thanks.

4 Q. (Ms. Rohn) Were you ever a board member of
5 Innovative, or its predecessor, Vitelco?

6 A. No.

7 Q. Have you ever held any offices with those
8 companies?

9 A. No.

10 Q. Ever attend any board meetings?

11 A. No.

12 Q. Ever make any presentations at any board meetings?

13 A. No.

14 Q. What was -- can you explain to me the relationship
15 or the -- of Jeffrey Prosser to Innovative during the time
16 period that you worked there?

17 A. He was the chairman and the owner.

18 Q. And in that position, what sorts of control did he
19 exert?

20 MR. RAMES: Object to form.

21 Q. (Ms. Rohn) You can answer.

22 A. He -- he controlled pretty much everything.

23 Q. Did he determine salaries?

24 A. You know, I couldn't say.

25 Q. Okay. Did he have control over who held what

ELIZABETH GOGGINS -- DIRECT

1 office, or who held what job?

2 A. Yes.

3 Q. Did he control the conditions of employment? In
4 other words, whether or not you could take vacation; whether
5 or not you got certain benefits?

6 MR. RAMES: Object to form.

7 A. The benefits, yes. Because I know -- you know, I
8 mean we were very small back then, and I knew -- I mean, I
9 had benefits that other people didn't have, etcetera,
10 etcetera. Vacation was pretty much -- I was the only one
11 who was restricted on vacation, because I had to pay all the
12 bills.

13 Q. Otherwise there was no restriction on vacations?

14 A. No, not that I was aware of.

15 Q. What benefits did you have that others did not
16 have?

17 A. My rent was paid.

18 Well, the benefits, actually the benefits for
19 all of us changed once the company split. Once the company
20 split from Prior, we all got extra benefits, or at least,
21 you know, some of us did.

22 There weren't very much of us there.

23 Q. Who got extra benefits?

24 A. Myself, Eling Joseph; maybe Ed Crouch, but I
25 couldn't say for sure.

ELIZABETH GOGGINS -- DIRECT

1 Q. And what types of extra benefits did you get?

2 A. Well, he bought cars for Eling and I.

3 Q. Anything else? You said you got -- your grant was
4 paid; what grant is that?

5 A. No, my rent.

6 Q. Oh, your rent was paid. Sorry. Okay.

7 A. Uh-huh. So my living expenses were paid, my rent.

8 Q. Anything else?

9 A. (Witness shakes head). No. That was kind of big.

10 Q. Do you know how it was determined who he would
11 give these special benefits to, and who he would not?

12 A. It was the people who had supported him during the
13 big fight he had had with Neil Prior. It was his way of
14 saying thank you for sticking with him.

15 Q. Okay. Now, what was Eling Joseph's role?

16 A. She was the executive assistant, his executive
17 assistant.

18 Q. And what was she responsible for?

19 A. She did pretty much everything.

20 Q. Like what?

21 A. She organized the office, she organized his life,
22 organized the family's life, handled all kinds of travel
23 arrangements. Everything.

24 Q. During this period of time, were you aware of an
25 involvement of Ann Abramson in the business?

ELIZABETH GOGGINS -- DIRECT

1 A. I knew they were friendly. I didn't know that she
2 was involved with Innovative, but I knew, when he bought the
3 bank, I believe she was on the board in the bank.

4 Q. What was your understanding of Jeffrey Prosser's
5 involvement in the Daily News?

6 A. He was the owner.

7 Q. Were you aware of whether or not he participated
8 in any decisions as to news stories at the Daily News?

9 A. (Witness shakes head). No.

10 Q. Were you aware of whether or not he or Mr. Crouch
11 wrote the editorials in the paper?

12 A. I knew that Ed wrote the editorials.

13 Q. Were you aware of whether or not Ed consulted with
14 Mr. Prosser in doing so?

15 A. I'm not aware. I don't know.

16 Q. Never heard them discuss editorials, or what they
17 should say?

18 A. No.

19 Q. Were there periodic meetings between the staff and
20 Mr. Prosser?

21 A. We didn't have real meetings, but we would have
22 lunch together often.

23 Q. And who all would be in the joint lunch together?

24 A. Those of us who were up in the office at the time.

25 Q. And can you describe where you'd be having lunch

ELIZABETH GOGGINS -- DIRECT

1 together at?

2 A. In the conference room.

3 Q. And was that lunch catered?

4 A. Yes.

5 Q. And --

6 A. Well, like catered, it was -- you know, may have
7 just been from Subway or whatever, but the messenger would
8 always go out and get lunch and bring it back. It wasn't
9 necessarily a restaurant or caterer coming in.

10 Q. And was that paid for by the company?

11 A. Yes.

12 Q. And did you have to be invited to those lunches?

13 A. No.

14 Q. How would you know whether or not you were able to
15 go to them or not?

16 A. Eling would ask what you wanted for lunch. She
17 would say where lunch was coming from. And then if it
18 was -- if there was a meeting going on, she would just let
19 you know. You'd have lunch in your office while the meeting
20 would go on.

21 Q. And was Mr. Prosser frequently at those lunches?

22 A. Yes.

23 Q. And who else would be frequently at those lunches?

24 A. Ed, if he was in the office; Curt Knock; Steve
25 Ross, who was in accounting. It depended on who was there.

ELIZABETH GOGGINS -- DIRECT

1 Q. And these lunches were daily, five days a week?

2 A. Pretty much.

3 Q. Do you know Holland Redfield?

4 A. Yes.

5 Q. Was Mr. Redfield ever at any of those lunches?

6 A. Yes.

7 Q. And did you do -- let me switch back before I go
8 there.

9 Did you do anything to prepare for your
10 deposition today?

11 A. I met with Kevin yesterday.

12 Q. How long you did you meet with him?

13 A. About a half-hour.

14 Q. Did you review any documents?

15 A. No.

16 Q. Was anybody else present?

17 A. No.

18 Q. Now, do you recall when Mr. Redfield -- whether or
19 not Mr. Redfield would ever attend those lunches while he
20 was still a senator?

21 A. No, he wasn't there.

22 Q. Were there ever any politicians that attended
23 those lunches?

24 A. Not that I remember.

25 Q. Did there come a time that you learned that

ELIZABETH GOGGINS -- DIRECT

1 Mr. Redfield was going to be hired by Innovative?

2 A. Yes.

3 Q. And how did you learn that?

4 A. It was just in the office, when he came in.

5 Q. Were you aware of how long, after Mr. Redfield
6 left the senate, it was that he was employed by Innovative?

7 A. I'd have to -- no, I don't know.

8 Q. Do you know if there was any agreement to hire
9 Mr. Redfield at Innovative before he left the senate?

10 A. No, but I remember Jeff saying at one point he was
11 a pain in the butt, and he was hiring him to keep him quiet.

12 Q. Okay. What did you understand he meant by "to
13 keep him quiet"?

14 A. To keep him from harassing him, asking him for a
15 job.

16 Q. Okay. And what did you understand Mr. Redfield's
17 job was?

18 A. I -- (witness shakes head) -- wasn't sure.

19 Q. Did you ever see him do any work?

20 A. Well, at the -- when he was hired, at that point
21 we were still up at Chase, and at that point they needed
22 extra office space, and so I was going to be moved downtown,
23 so instead of moving downtown, I worked out of my house. So
24 I worked out of my house for two years, maybe? So while he
25 was there, I wasn't in the office a lot. I'd come in,

ELIZABETH GOGGINS -- DIRECT

1 but -- so like the lunches that were taking place then with
2 Redfield, I wasn't there, because I would be at home.

3 Q. Okay.

4 A. Then I stayed at home until the new building
5 opened, until Berjet opened.

6 Q. Then when the new building opened, did you
7 continue to see Redfield present?

8 A. I'd see him, but not much.

9 Q. Okay. Did you ever have any idea what his job
10 duties were?

11 A. (Witness shakes head). No.

12 Q. Did it appear -- well, did you ever draw the
13 conclusion that he was not doing much work for the company?

14 MR. RAMES: Object to form.

15 A. No.

16 Q. (Ms. Rohn) You just didn't know what it was he
17 was doing or wasn't doing?

18 A. (Witness nods head.)

19 Q. Were you ever told that he was the communication
20 officer for the phone company?

21 A. No.

22 Q. Did you ever know him to draft press releases or
23 make any press statements or make any press recommendations
24 during the time that he was there?

25 A. I wasn't aware of it. But -- (witness shakes

ELIZABETH GOGGINS -- DIRECT

1 head) .

2 Q. Did you ever hear any conversations about his
3 employment being a favor?

4 A. No.

5 Q. Did there come a time that you learned that
6 Mr. Redfield was no longer with the company?

7 A. After the trustees came in.

8 Q. From your observation, how active in politics was
9 Mr. Prosser?

10 A. I knew --

11 MR. RAMES: Object to form.

12 Q. (Ms. Rohn) You can answer.

13 A. I know he supported candidates. All candidates.
14 You know, he always -- you know, during different elections,
15 he just would support everybody.

16 Q. Were you, in your -- was part of your
17 responsibility to write campaign checks?

18 A. Campaign checks didn't come from the company.

19 Q. Did you have access or have any knowledge of
20 campaign monies that were paid to candidates?

21 A. The only one I knew of for sure was to Emmett
22 Hansen, because he told me he was supporting Emmett, because
23 I was working with Emmett at the time.

24 Q. So he, being Prosser, told you he was supporting
25 Emmett?

ELIZABETH GOGGINS -- DIRECT

1 A. Uh-huh.

2 Q. Do you know how much money he gave to Emmett
3 Hansen?

4 A. There were donations from Jeff and Dawn and
5 Adrian.

6 Q. And did those all come from Mr. Prosser?

7 A. I don't know. Redfield gave the donation to
8 Emmett, so I don't know what form.

9 Q. And why would Redfield give a donation from
10 Prosser to Emmett?

11 A. I'm not sure, but I remember that Emmett called me
12 to tell me that Redfield was making a big deal of it, that
13 he got Jeff to donate. And Emmett laughed, because he
14 already knew he was getting the donation, because Jeff told
15 me. He didn't say anything to Redfield, because Redfield
16 was carrying on, as only Redfield can carry on, you know.

17 Q. Did you, from your observation, ever form or ever
18 observe that Redfield was involved in political activities
19 on behalf of Prosser?

20 MR. RAMES: Object to form.

21 A. Yes.

22 Q. (Ms. Rohn) Okay. What did you observe?

23 A. There's -- Kevin Callwood has a contract with the
24 Virgin Islands Government, he brings members of Congress
25 here, and there are local fundraisers done, so they'll

ELIZABETH GOGGINS -- DIRECT

1 support the Virgin Islands in Congress. And Redfield worked
2 on that committee.

3 I worked on it, because Kevin and I are old
4 friends. But Redfield was Jeff's representative.

5 Q. And what would he do, as Jeff's representative?

6 A. There would be meetings. It was formed for the
7 issues with the EDC companies, primarily, and then other
8 Virgin Islands issues, so there were some meetings that took
9 place deciding on who should come down, etcetera, etcetera.

10 Members of Congress were chosen by their
11 committees that they served on, and then there would be --

12 MS. ROHN: Hold on a second.

13 (Discussion held off the record.)

14 Q. (Ms. Rohn) Go ahead.

15 A. When the events happen, there's a roundtable with
16 the member of Congress and certain representatives, and then
17 there'll be a cocktail party. So the people who actually
18 sit around the table pay extra money, whatever. And I know
19 he was at a couple of those, early on. But then Jeff kind
20 of dropped out of it.

21 Q. When you say "he" was at a couple of those --

22 A. Redfield. Redfield.

23 Q. Did you hear Mr. Prosser discussing politics?

24 A. When we used to have lunch together, yeah, we'd
25 talk politics sometimes. Whatever the news of the day was,

ELIZABETH GOGGINS -- DIRECT

1 we would talk about.

2 Q. Did the legislation that was discussed at these
3 meetings ever include creating categories for tax exemptions
4 of banking or telecommunications?

5 MR. RAMES: Object to form.

6 A. I don't remember that, specifically. I wasn't at
7 all of the meetings. I don't remember about
8 telecommunication.

9 Q. (Ms. Rohn) Were you aware of payments made to
10 Kenneth Mapp from any of the accounts, either ICC, or
11 Jeffrey Prosser, or from anywhere?

12 A. Yes.

13 Q. What were you aware of in that regard?

14 A. There were payments made from -- it was ATN back
15 then for a couple months. Then it was moved to St. Maarten
16 Cable TV.

17 Q. And how much were the payments?

18 A. \$25,000 a month.

19 Q. And where were the payments made to?

20 A. They were made to Ken Mapp. He was going to
21 school at the time, and I believe they were sent to him in
22 Massachusetts.

23 Q. Do you know whether or not those payments started
24 while Mr. Mapp was still Lieutenant Governor?

25 A. Yes.

ELIZABETH GOGGINS -- DIRECT

1 Q. They did?

2 A. Yes.

3 Q. And how long was he Lieutenant Governor while he
4 was receiving those payments?

5 A. It started July or August, before the election.

6 Q. Were you ever informed of the purpose of those
7 payments?

8 A. Yes.

9 Q. And what were you informed was the purpose of
10 those payments?

11 A. He was being paid not to run for Governor.

12 Q. And who informed you of that?

13 A. It was Tom Minnich.

14 Q. Tom Minnich?

15 A. It was either Tom or Jeff.

16 Q. And Mr. Minnich was the CEO, is that right?

17 A. Yes.

18 Q. Did you have those conversations with Mr. Prosser,
19 as well?

20 A. I don't remember. I remember it was Tom.

21 Q. Okay.

22 A. I believe it was Jeff, too, but I couldn't
23 absolutely swear.

24 Q. Well, was Tom Minnich allowed to decide to make
25 25,000-dollar payments to a politician without Mr. Prosser's

ELIZABETH GOGGINS -- DIRECT

1 approval?

2 A. No.

3 Q. Do you know how long those payments went on?

4 A. No, because they were switched to St. Maarten, and
5 I didn't -- I didn't deal with St. Maarten.

6 Q. Were you ever aware of whether or not -- well,
7 were you aware that there was a problem with the payment of
8 franchise taxes by Innovative?

9 MR. RAMES: Object to form.

10 A. Was it -- wasn't it all companies, there was some
11 change or something? I remember there was something, I
12 thought --

13 Q. (Ms. Rohn) Were you aware that Innovative owed
14 franchise taxes?

15 A. There was a new calculation or something that was
16 done, because I had -- I was the one who was doing checks,
17 and there was a new calculation I remember. I knew it, I
18 don't remember what happened with that, but I remember there
19 was some change, whatever, in calculation and so. But I
20 don't know what the outcome of that was.

21 That may have been the time when I was
22 switching, whatever, whatever.

23 Q. Do you know if those franchise taxes were
24 forgiven?

25 A. No, I don't.

ELIZABETH GOGGINS -- DIRECT

1 Q. Do you know whether or not there was a push for
2 some tax exemptions, while Mr. Mapp was Lieutenant Governor,
3 by Innovative or its related companies?

4 A. I know we had gone for -- for benefits, but I
5 don't know when that was.

6 Q. Did you ever speak to Mr. Mapp about these
7 payments?

8 A. Yes.

9 Q. And how many times did you speak to him about
10 these payments?

11 A. It was just once, because we paid his rent on his
12 furniture.

13 Q. You mean his storage?

14 A. No, the furniture he rented for his apartment up
15 there. So he gave me that bill.

16 Q. Did he give it to you personally?

17 A. I remember talking to him about it. Whether or
18 not it was in person, I don't remember.

19 Q. And what was the substance of what the
20 conversation was about?

21 A. Just that it was going to be paid, whatever.

22 Q. Were you aware of any other payments to
23 politicians?

24 A. No.

25 Q. Were you ever aware of any loans to politicians?

ELIZABETH GOGGINS -- DIRECT

1 A. No.

2 Q. How were the payments to Mr. Mapp booked?

3 A. Consulting fees.

4 Q. To your knowledge, did Mr. Mapp provide any
5 consulting?

6 A. I don't (witness shakes head).

7 Q. You never witnessed any?

8 A. No.

9 MR. RAMES: Object to form.

10 A. But I wouldn't have.

11 Q. (Ms. Rohn) Well, did you ever see any invoices,
12 or were these just \$25,000 every month.

13 A. I -- like I said, I only did it two or three
14 times, so it was -- it became -- I had a number of payments
15 I made monthly. That was added on to it.

16 Q. Besides the rent on his furniture and the \$25,000
17 a month, were any other payments made, such as his rent on
18 his apartment or travel costs or --

19 MR. RAMES: Object to form.

20 A. No other payments.

21 Q. (Ms. Rohn) Do you know whether or not
22 Holland Redfield was aware of these payments?

23 A. No, I don't.

24 Q. Do you know who else was aware of these payments,
25 besides yourself and Mr. Prosser and Mr. Minnich?

ELIZABETH GOGGINS -- DIRECT

1 A. It would have been Steve Ross, who was in
2 accounting, and Mike Cumbermack, who was the CFO at the
3 time.

4 Q. And who would have been responsible for making the
5 payments once they were changed to the St. Maarten account?

6 A. That was -- that was Barry Denham was down there.

7 Q. Do you know why they were changed from being made
8 from the Virgin Islands account to the St. Maarten account?

9 A. So people here wouldn't find out.

10 Q. Now, do you know Senator Donastorg?

11 A. Yes.

12 Q. Have you ever heard Mr. Prosser discuss
13 Mr. Donastorg?

14 A. Very little.

15 Q. Were you aware of whether or not there was a
16 dislike by Mr. Prosser of Mr. Donastorg?

17 A. Yes.

18 Q. And how were you aware of that?

19 A. Mostly -- mostly in the media.

20 Q. In what?

21 A. In the media.

22 Q. What do you --

23 A. We had an arrangement, just like the senator and I
24 had an arrangement; we never -- because Jeff was aware that
25 we were friendly, and so -- and because of my job at the

ELIZABETH GOGGINS -- DIRECT

1 time being environmental, and the senator being chair of the
2 environmental committee, he never discussed the senator with
3 me, and we never discussed Jeff.

4 Q. "We" being you and Senator Donastorg?

5 A. Uh-huh.

6 Q. However, at the lunches or different places, did
7 you ever hear him make comments?

8 MR. RAMES: Object to form.

9 A. Not while I was there. Not while I was there.

10 Q. (Ms. Rohn) Were you ever informed by others that
11 he had made comments?

12 A. I knew that -- not at the time, later on -- I knew
13 that Benta got involved with something, but I -- maybe
14 everybody knew not to say anything in front of me. I don't
15 know. You know?

16 Q. Did you ever hear Dyke Redfield make comments
17 about Senator Donastorg?

18 A. No.

19 Q. Did you ever hear Oakland Benta make comments
20 about Senator Donastorg?

21 A. Yes.

22 Q. What sorts of comments did you hear him make?

23 A. Well, this was -- this was after the investigation
24 thing came out, and just (witness shakes head). You know, I
25 really couldn't tell you what was said, but I remember him

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1 talking about it, not being very fond of the senator.

2 Q. Benta not being very fond of the senator?

3 A. Uh-huh.

4 Q. Were you ever aware of any need that any of the
5 corporations had for Certificates of Good Standing that they
6 had to get from the Lieutenant Governor's Office?

7 MR. RAMES: Object to form.

8 A. I know we had to get them. But we usually -- I
9 remember, at one point, we -- there were some issues, and
10 they gave them to us kind of conditionally, so we could get
11 our business license. But that was a while ago.

12 I don't remember exactly what happened, but
13 we were able to get our business license. But -- there were
14 some things going on with taxes, and I wasn't involved with
15 the taxes at all, so I couldn't tell you what was going
16 on -- but I remember we got them, like I said, I think it
17 was conditionally we got them, so we could get the license.

18 Q. (Ms. Rohn) Do you know who would have known
19 about -- who would have been dealing with that at that time?

20 A. That was Mike Cumbermack. Mike was, even when he
21 was still at Vitelco, he was the one who would pretty much
22 handle all that.

23 Q. Do you know where he is now?

24 A. He's Vitelco CFO.

25 Q. Vitelco what?

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1 A. CFO.

2 Q. So he's still here?

3 A. Yes.

4 Q. Okay. Did you ever observe the relationship
5 between Roy Schneider and Jeffrey Prosser?

6 A. Yes.

7 Q. What did you observe in that regard?

8 A. They were very friendly.

9 Q. Were you ever aware that Mr. Schneider would stay
10 at Mr. Prosser's house when he came to St. Croix?

11 A. That I didn't know.

12 Q. Well, what did you observe that made you assume
13 that they were very friendly?

14 A. He would be in the office frequently. Jeff would
15 talk about him, and talk about, you know, different things
16 that were going on, etcetera, etcetera.

17 Q. And what would he say about him?

18 A. Sometimes he'd yell about things he was doing, and
19 sometimes he'd -- I remember at one point he said, You would
20 think having a friend in government might get more things
21 done, but he's not doing what I want.

22 Q. Was it Roy Schneider that Mr. Mapp was not
23 supposed to run against?

24 A. Yes.

25 Q. Do you know whether or not Roy Schneider knew that

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1 Mr. Mapp was making these payments up in order to prevent
2 him from doing it?

3 A. I don't know.

4 MR. RAMES: Object to form.

5 Q. (Ms. Rohn) Were you aware of any funds that were
6 available to be paid to politicians?

7 A. No.

8 MR. RAMES: Object to form.

9 Q. (Ms. Rohn) Well, were you aware of any other
10 payments for political reasons beside the one to
11 Kenneth Mapp?

12 A. I -- you mean things that we had paid for, or --

13 Q. Uh-huh.

14 A. The concerts for the inauguration for Schneider,
15 those were paid for. Turnbull's were paid for. I don't
16 know.

17 Q. And approximately how much was spent on those?

18 A. I remember one check for \$48,000, but I don't
19 remember if that was one or both of the -- because there
20 were concerts done, Patty Austin. But I don't remember if
21 that was just for St. Thomas, or that was for both. I don't
22 remember.

23 Q. Were you aware of Prosser providing politicians
24 with flights on his plane?

25 A. I know Ann Abramson flew on the plane.

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1 Q. Did she do so while he she was in Public Works?

2 A. Yes.

3 Q. And how frequently would she do that?

4 A. I don't know.

5 Q. Would you get the manifest for the passengers on
6 the plane?

7 A. Yes.

8 Q. Were you aware of anyone else in government that
9 was allowed to fly on the planes?

10 A. Off the top of my head, I can't remember. I
11 remember -- I remember Ann flew. Schneider had started
12 flying, but then that stopped.

13 Q. And how long did Schneider fly on his plane?

14 A. Not too long.

15 Q. How about Turnbull?

16 A. At that point, I wasn't in accounting anymore, so
17 I don't know.

18 Q. Did you ever know people like Rocky Liburd to fly
19 on the plane?

20 A. Not that I remember.

21 Q. Do you remember a time that there was a plane trip
22 to go see --

23 MR. DONASTORG: Timothy Duncan.

24 Q. (Ms. Rohn) -- Timothy Duncan -- my brain -- in
25 San Antonio?

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1 A. That was after I was out of accounting.

2 Q. Were you aware that various politicians, such as
3 Adelbert Bryan and Chucky Hansen, were given free
4 transportation to the Spurs game?

5 A. I don't know.

6 Q. Were you aware of Mr. Prosser making any payments
7 to Ann Abramson?

8 A. I found out from the trustees that some of the
9 companies we were paying, she actually owned. But I didn't
10 know it at the time, and I couldn't tell you what ones they
11 were.

12 Q. Were you aware of payments made to her while she
13 was in prison?

14 A. No.

15 Q. Do you know how much money was paid to companies
16 she actually owned?

17 A. No, I don't. That was just a discussion that we
18 were having around it.

19 Q. Do you know whether or not these payments were
20 made while she was a government employee?

21 A. I don't know.

22 Q. Now, Oakland Benta, when did you first meet
23 Oakland Benta?

24 A. The first time, he was still working for the
25 Governor. He was up in our office that day.

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1 Q. Was that Governor Schneider?

2 A. Yes.

3 Q. What was he doing for Governor Schneider?

4 A. He was security.

5 Q. Was he paid by Innovative or its related companies
6 to be security?

7 A. At that point, or in -- not then, no.

8 Q. Were you aware of Mr. Prosser, or any of his
9 companies, ever paying for Schneider's security?

10 A. No.

11 Q. And why did he come to your office, if he was
12 security for --

13 A. The Governor was there, so he had come with him.

14 Q. And do you know how it came about that Mr. Benta
15 went to work for --

16 First of all, who do you understand Mr. Benta
17 did go to work for?

18 A. For Jeff.

19 Q. Jeff directly, or Innovative, or who paid?

20 A. The company paid.

21 Q. The company paid for him?

22 A. Uh-huh.

23 Q. But he worked personally for Prosser?

24 A. Well, how do you mean, personally? I mean, he did
25 company work.

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1 Q. Okay. What was his role?

2 A. He was the head of security.

3 Q. And do you know why he went from the Governor to
4 Prosser's companies?

5 A. The story I was told was that the Governor was at
6 Jeff's house, and Benta had gone all day without even having
7 a chance to get a drink of water, and he almost passed out.
8 And he was in the kitchen with Jeff, and Jeff gave him water
9 and offered him a job.

10 Q. Did Mr. Prosser tell you that?

11 A. Benta.

12 Q. Benta told you that?

13 A. Uh-huh.

14 Q. Okay. And what did you understand his position or
15 his job responsibilities to be, as head of security?

16 A. Pretty much take care of Jeff.

17 Q. Okay. And what sorts of things did he do to take
18 care of Jeff?

19 A. Traveled with him, drove him back and forth, set
20 up security at the house, at the office. He hired a staff.
21 Like I said, he traveled with him when he would go to New
22 York or Europe, whatever.

23 Q. Do you know why Mr. Prosser thought he needed
24 security?

25 A. No.

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1 Q. Did you ever observe any reason why Mr. Prosser
2 might have needed security?

3 A. No.

4 Q. Did you ever form an opinion as to why there were
5 all these security people around?

6 MR. RAMES: Object to form.

7 Q. (Ms. Rohn) You can answer.

8 A. I know at one point there was something going on
9 that people were upset about, and I don't remember what it
10 was (witness shakes head). I don't remember. But I
11 remember public opinion of the company was dropping rapidly.
12 He had said, you know, when he would go out to eat, people
13 would be stopping him, etcetera. So --

14 Q. (Ms. Rohn) How much of the time would
15 Oakland Benta actually spend with Mr. Prosser?

16 A. Not much.

17 Q. Well, if he was --

18 A. Well, when they would travel. But once he had
19 hired a staff, he wasn't there as much as he had been.

20 Q. Were you ever aware of an occasion where
21 Oakland Benta bought -- had a boat purchased because he --
22 supposedly, he was claiming that people were going to come
23 in on jet skiis?

24 A. Yes. And he also had -- all the security people
25 were -- received training, etcetera.

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1 Q. Were you aware he then took over that boat and
2 used it for himself?

3 A. Yes, I heard that.

4 Q. Were you ever aware of the fact that an in-depth
5 investigation was commissioned on Mr. Donastorg and his
6 family?

7 MR. RAMES: Object to form.

8 A. I found out about it afterwards.

9 Q. (Ms. Rohn) And how long afterwards did you find
10 out about it?

11 A. I don't know. I paid the invoice. I paid the
12 invoice.

13 Q. Okay. And what company paid the invoice?

14 A. Probably ATN Co.

15 Q. ATN Co.?

16 A. Because there's Atlantic Tele-Network Inc. and
17 Atlantic Tele-Network Co., Inc. Well, at that point it
18 would have been ATN Co., because Neil had ATN, Inc.

19 Q. And ATN Co. became Vitelco?

20 A. Became -- Gees, became Innovative -- became ICC.

21 Q. Which owned Vitelco?

22 A. Yes.

23 Q. Do you know what Vitelco's involvement was in that
24 investigation?

25 A. No.

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1 Q. Do you know who commissioned that investigation?

2 A. No.

3 Q. When you got the invoice, how did you book the
4 invoice?

5 A. I don't remember if there was a separate category
6 for security, or if it went to -- it would have gone --
7 however we booked the Sheraw invoices, that's where it would
8 have gone.

9 Q. Were you aware that the bill had been made out to
10 Oakland Benta?

11 A. I don't -- I don't remember.

12 Q. If the bill had been made out to Oakland Benta,
13 would that dictate where it would have been paid from?

14 A. No.

15 Q. Would it have dictated how it would have been
16 classified?

17 A. No.

18 Q. Do you have any knowledge of the involvement of
19 Oakland Benta in that investigation?

20 A. No.

21 Q. At any time has Oakland Benta said anything about
22 his knowledge of that investigation?

23 A. I don't remember.

24 Q. What is your relationship with Oakland Benta?

25 A. When he first started with the company, we were

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1 friends; but now, I don't believe he's ever told the truth
2 in his life.

3 Q. And why do you say that?

4 A. He -- there's -- if you work with him for a while,
5 you'll find out. He just -- he's very good at what he does.

6 Q. Which is what?

7 A. Saying things, and meaning something totally
8 different.

9 Q. Can you give me some examples?

10 A. A number of years ago, like I said, we were
11 friends, and he was talking about a company he was going to
12 be starting. And at that point, my father was living with
13 me, and I used to take him to Puerto Rico once a month for
14 chemo at the V.A., and he was actually -- he was going to be
15 involved in developing an airport in Puerto Rico, and he
16 wanted me to work with him doing a lot of the environmental
17 work.

18 And I went -- and this was a gentleman who
19 worked for us in Puerto Rico when we used to keep the jet
20 over there, and I met with him one time, because -- well, my
21 father was doing chemo. I had a four-hour window where I
22 had nothing to do. I went to Dorado to see the property,
23 met with some guy who worked in the legislature over there,
24 saw the designs, the logos of planes and this and that. He
25 was going to start an airline, too, between St. Thomas,

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1 St. Croix, or between Puerto Rico and the V.I.

2 And he supposedly had all this money that he
3 had inherited from his grandfather, who had these huge
4 funeral homes -- home or homes up in New York. And so he
5 had all this money, and this -- he was going to do some
6 development here, also.

7 And so, you know, we had all this talk about
8 setting up this company, etcetera, etcetera, and there are a
9 number of other people here that he had also -- you know, he
10 was all set, ready to go. I was ready to quit my job. I
11 had my resignation letter. He said to me, Hold on, hold on,
12 and so I didn't turn it in.

13 And he had promised -- the Rotary Clubs were
14 doing a fund-raiser, and he had promised to be a sponsor,
15 and he kept on avoiding me. And the money he was giving was
16 to pay a band, whatever, and he never came through with it.
17 And it was the day of the event, and I happened to run into
18 Joe Jaber, who was also looking for him, because he was
19 supposedly getting into a business deal with Joe. And Joe
20 was in my Rotary Club, and Joe ended up putting up the money
21 for the event.

22 And that was pretty much the last time I
23 spoke to Mr. Benta.

24 Q. So he never really had investment in an airport or
25 an airline?

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1 A. Huh-uh. And this was a story in the -- one of the
2 Spanish-speaking newspapers. I saw it. I saw the picture
3 of the guy from Puerto Rico, and Benta's name was in the
4 story, talking about the airport and stuff. They testified
5 in front of the legislature over there. And there was a
6 woman senator who was opposed to it, and they ended up
7 getting her, I don't know, did something to her, got her
8 kicked out of the senate or something.

9 Q. But he never really had any money?

10 A. No.

11 Q. Was that the only incidence that you found that he
12 made up stories?

13 A. That was my personal involvement. But you just,
14 you can't believe anything he says.

15 Q. Dyke Redfield has stated under oath that it was
16 Oakland Benta who told him that Senator Donastorg was
17 believed to be taking bribes from AT&T.

18 Did you ever hear any stories about that?

19 **MR. RAMES:** Object to form.

20 A. Yeah, now that you say, I do remember some
21 stories, but I don't know what they were. I don't -- it's
22 been a long time.

23 Q. **(Ms. Rohn)** Was it widely known at the company
24 that Mr. Benta's statements couldn't be believed?

25 A. It takes some time for -- because he's very good,

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1 you know? I know he talks about his training, you know,
2 with the Secret Service and stuff, and it turns out it was
3 just like a couple of days before Clinton came here, that
4 was his extensive training with the Secret Service. He
5 talks about being a member of the Martial Arts Hall of Fame,
6 and he is not. He talks about who he studied with over
7 here, and they say that he never studied with them.

8 You know, there's -- once you know Mr. Benta,
9 you can easily fact check and find out (witness shakes
10 head) --

11 Q. You're shaking your head.

12 A. Find out that his facts leave a lot to be desired.

13 Q. Did you ever discuss, or are you aware of whether
14 or not Mr. Redfield knew that Mr. Benta was not to be
15 trusted?

16 MR. RAMES: Object to form.

17 A. Probably not. Like I said, it takes -- he's very
18 good, and he's -- it takes a while.

19 Q. (Ms. Rohn) Do you recall any conversations that
20 you heard at all while at Innovative about Senator
21 Donastorg, and him being anti-business or anti-Vitelco or --

22 A. I couldn't say, you know? I mean, I was aware of
23 the sentiment, but I wouldn't say anti-business. It was
24 more anti-Jeff, I would say.

25 But who said what, I couldn't tell you.

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1 Q. Well, was there some animosity for the fact that
2 he was not letting Mr. Prosser do the things he wanted to do
3 without a lot of flack?

4 MR. RAMES: Object to form.

5 A. Yes.

6 Q. (Ms. Rohn) And how did that -- how did you
7 observe that animosity?

8 A. Just, it's hard to say, you know? You just -- be
9 just a comment here, there, you know. It wasn't -- like I
10 said, there wasn't much discussed with me at all.

11 Q. Were you aware that Mr. Prosser would give Ann
12 Abramson money to donate to politicians?

13 A. No.

14 Q. Were you ever aware that Mr. Prosser had a party
15 up at what used to be Villa Madeleine, that was touted as
16 Ann Abramson's party for Schneider, but Mr. Prosser actually
17 paid for it?

18 A. No.

19 Q. Did you ever hear anybody brag about how much
20 money he spent on political races?

21 A. No.

22 Q. Were you aware of any discussions between
23 Mr. Prosser and Ms. Abramson, when she was charged with the
24 felonies of misappropriation of funds?

25 A. I wasn't aware of conversation.

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1 Q. Were you aware of anything in that regard?

2 A. No.

3 Q. Did Ms. Abramson and Mr. Prosser remain friends
4 even after she was convicted?

5 A. I don't know.

6 Q. Were you ever aware of the relationship between
7 Mr. Prosser and Mr. Tutein, John Tutein?

8 A. Yes.

9 Q. What did you observe in that regard?

10 A. I knew that John came and worked for Jeff.

11 Q. Were you aware of Mr. Prosser ever having
12 Mr. Tutein provide money or goods or services to
13 politicians?

14 A. No.

15 Q. When Mr. Jn. Baptiste claimed that Mr. Tutein had
16 offered him a bribe over the Prosser bill, did you have any
17 knowledge of that?

18 MR. RAMES: Object to form.

19 A. No.

20 Q. (Ms. Rohn) Are you aware of any payments to
21 Senator Petrus --

22 A. No.

23 Q. -- by --

24 A. Well, I know that there was a trial, but I wasn't
25 aware.

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1 Q. You had never seen any -- provided anybody cash or
2 given anybody money to go to Mr. Petrus?

3 A. After -- after the trial, I received an
4 inter-company charge from Vitelco for \$98,000 in cash.

5 Q. For what?

6 A. Public relations.

7 Q. For who?

8 A. It was just charged to public relations.

9 Q. And what happened to that money?

10 A. I don't know. It was after the fact.

11 Q. And -- well, who did you think the money went to?

12 A. I was never told. I was just told it was public
13 relations.

14 Q. Did you believe that that paid for someone's
15 attorney fees?

16 MR. RAMES: Objection to form.

17 A. (Witness shakes head).

18 Q. (Ms. Rohn) Well, did you ever see a bill for
19 \$98,000 for public relations?

20 A. No. It was cash withdrawals that were made on
21 St. Thomas.

22 Q. For \$98,000?

23 A. (Witness nods head.)

24 Q. And who got the cash?

25 A. Mike Cumbermack.

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1 Q. Did he ever give an accounting of what he spent
2 the cash on?

3 A. I don't know.

4 Q. From your observations of the company, do you have
5 an opinion where that money went?

6 MR. RAMES: Object to form.

7 A. I just know it was strange that I got it after the
8 trial was over, and it was done before the trial.

9 Q. (Ms. Rohn) It was what?

10 A. There was cash withdrawals that were done well
11 before the trial.

12 Q. So there were cash withdrawals that were done well
13 before the trial, but you didn't get an invoice to log them
14 until after the trial?

15 A. It wasn't an invoice. It was an inter-company
16 transfer. It was charges on Vitelco that were moved over to
17 ATN.

18 Q. And where had they been originally?

19 A. Vitelco.

20 Q. Let me see if I understand this, because I'm not
21 the best accountant in the world. In other words, cash came
22 out of Vitelco, and ATN paid Vitelco back?

23 A. Uh-huh.

24 Q. Were those cash payments ever revealed to the PSC?

25 A. I don't know.

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1 Q. So the \$98,000 in cash that came from Vitelco went
2 to Mike Cumbermack?

3 A. I can't say for absolute certain, because what
4 would happen oftentimes, we would send a letter to Banco
5 asking for a cash withdrawal, and if it was on St. Thomas,
6 it would go to Mike.

7 Q. (Counsel indicates affirmatively.)

8 A. Usually, like if Jeff were travelling, I would
9 send a letter to Banco, I would send it to Banco on
10 St. Thomas, because that's where our account manager was,
11 and the money would be withdrawn over here. Because he
12 always traveled with a lot of cash, so it would be given to
13 him over here. But on St. Thomas, the cash withdrawals
14 always went to Mike, but now, I didn't do those, so I don't
15 know. I just got the --

16 Q. The interoffice transfer?

17 A. Yes.

18 Q. And so how long -- do you remember what period of
19 time these transfers, --

20 A. No, I don't.

21 Q. -- these withdrawals were made?

22 A. No.

23 Q. Do you know if it was at or near the time of the
24 Prosser bill hearings?

25 A. You know, I couldn't be absolutely certain.

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1 Q. Would there be documents that would tell you that?

2 A. There should be.

3 Q. What would those documents be?

4 A. In Vitelco, it should be in their -- well, it
5 would have to be in their bank reconciliations, and it would
6 be in the inter-company journals.

7 Q. And do you remember what year this was?

8 A. I don't remember what year the trial was.

9 Q. So do you remember how long before the trial was
10 that these withdrawals had been made?

11 A. No.

12 Q. Okay. Now, are you aware of any other monetary
13 irregularities that occurred while you were an account
14 manager?

15 MR. RAMES: Object to form.

16 A. No.

17 Q. (Ms. Rohn) When --

18 A. I knew, like when the payment was done for the
19 concerts and things, I got a copy of Title 18 and I kept it
20 out on my desk.

21 Q. What is Title 18?

22 A. The election code.

23 Q. Did you discuss with anyone the fact that there's
24 a limit on how much you can give to a candidate or a
25 politician?

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1 MR. RAMES: Object to form.

2 A. What went through me met that limit. It didn't --
3 of the actual like campaign contributions. But then after
4 the election, you know, like the concerts and things. And
5 you know, there were some things that we paid for, like
6 Barbara Schneider -- that was her name, right? -- had a
7 Christmas party. I remember we paid for the toys and stuff.

8 There were other things like that, but I --
9 and it was about, you know, that's when I had Title 18 out.
10 I also got a subscription to Business Ethics Magazine.
11 Craig Knock used to take it and put it on the front counter,
12 and -- we tried.

13 Q. (Ms. Rohn) Did you get out Title 18 because you
14 believed those payments were in violation to Title 18?

15 MR. RAMES: Object to form.

16 A. Yes.

17 Q. (Ms. Rohn) And did you discuss that with anyone?

18 A. There was nobody to discuss it with.

19 Q. And the reason for that is why?

20 A. (Witness shrugs shoulders.) There was nobody there
21 to discuss --

22 Q. I'm sorry?

23 A. There was nobody to discuss it with.

24 Q. Well, why didn't you tell it to Mr. Prosser?

25 A. There were some things you didn't bring up with

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1 him.

2 Q. Did you understand that it was he who had approved
3 those payments?

4 A. Yes.

5 Q. Did you ever discuss it with Mr. Minnich?

6 A. No.

7 Q. Did you ever discuss it with Mr. Cumbermack?

8 A. No.

9 Q. Why not?

10 A. (Witness shakes head). No. Craig and I discussed
11 it, Craig Knock and I, but it was, Don't ask questions.

12 Q. And what do you mean, it was, Don't ask questions?

13 A. Just do it.

14 Q. If you wanted to keep your job?

15 A. (Witness nods head.)

16 MR. RAMES: Object to form.

17 A. Yes.

18 Q. (Ms. Rohn) Since the trustee has taken over, have
19 you been informed of any other irregularities?

20 A. No.

21 Q. Have you learned of any other irregularities from
22 whatever source?

23 A. Yes.

24 Q. What have you learned?

25 A. Well, nothing specific, but, you know, I -- when

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1 Ingrid was there, because they would come back and ask me a
2 lot of questions --

3 Q. Like what?

4 A. You know, about different invoices and things.

5 But what I realized, when I did accounts
6 payable, the description that I would put on the check
7 didn't show in the general ledger, so I would be very
8 descriptive on the check, so I knew what it was for, because
9 I knew nobody would ever see it but me.

10 So when the trustees, when they went back,
11 they saw it, so they were booked. They thanked me
12 profusely, because it made their life very easy.

13 Q. And who's Ingrid?

14 A. Ingrid, I believe her last name is Jackson, she
15 was one of the trustees. She was their forensic accountant.

16 Q. Do you know Lowe Davis?

17 A. Yes.

18 Q. And how do you know her?

19 A. From the Daily News.

20 Q. Have you -- what's your relationship with Lowe
21 Davis?

22 A. I actually, I knew her long before Jeff bought the
23 newspaper. I used to date the news editor when I lived on
24 St. Thomas, so I knew most the people at the Daily News
25 (witness nods head).

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1 Q. Okay. Have you ever had any discussions with her
2 about her opinions or views about Mr. Donastorg?

3 A. No.

4 Q. Are you aware of whether or not she dislikes him?

5 A. No.

6 Q. Do you know Jason Robbins?

7 A. Yes.

8 Q. How do you know Jason Robbins?

9 A. From the Daily News.

10 Q. Have you ever had any discussions with him about
11 his likes or dislikes of Mr. Donastorg?

12 A. No.

13 Q. Were you ever aware of an occasion where Melvin
14 Claxton had participated with Lowe Davis on an exposé of the
15 Byrd family, and it had been printed in the Daily News?

16 A. I remember, yes.

17 Q. Were you ever aware of the anger of Mr. Prosser
18 about the story?

19 A. No.

20 MR. RAMES: Object to form.

21 Q. (Ms. Rohn) Did you ever have any knowledge of him
22 pulling it off the wire service.

23 A. No.

24 Q. What was your understanding of Ed Crouch's job?

25 A. For the longest time, he was investor relations,

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1 and then when Jeff bought the newspaper, he basically
2 oversaw it. He would do the editorials and things.

3 Q. And he worked for Innovative or Vitelco?

4 A. Innovative.

5 Q. Do you know whether or not Mr. Prosser received
6 the dailies of the paper before they went out each day?

7 MR. RAMES: Object to form.

8 A. No, I don't.

9 Q. (Ms. Rohn) From your knowledge of Mr. Prosser, if
10 he disliked someone, did he have -- I don't want to say a
11 vendetta, but did he have hard feelings against those
12 people?

13 MR. RAMES: Object to form.

14 A. He'd get hard feelings.

15 Q. (Ms. Rohn) Did you ever know him to attempt to
16 use the newspaper against those people?

17 MR. RAMES: Object to form.

18 A. Not that I was aware of.

19 Q. (Ms. Rohn) For instance, a Ms. Bedminster has
20 testified that he disliked Rutnik, --

21 A. (Witness nods head.) Uh-huh.

22 Q. -- and she was forbidden to write anything nice
23 about him.

24 Did you ever know anything like that?

25 MR. RAMES: Object to form.

ELIZABETH GOGGINS -- DIRECT

1 A. No. I wouldn't have been involved in that, no.

2 Q. Were you aware of persons that Mr. Prosser felt
3 were not his friends?

4 A. Aside from the senator, because that was
5 so public, --

6 Q. You mean Senator Donastorg?

7 A. Yes.

8 -- I really can't think of anybody off the
9 top of my head. (Witness shakes head). I can't.

10 MS. ROHN: Okay. I might be finished just a
11 second.

12 (Respite).

13 MS. ROHN: I don't have any other questions
14 at this time.

15 THE WITNESS: (Witness nods head.)

16 MR. RAMES: Neither do you?

17 THE WITNESS: Huh-uh.

18 MS. ROHN: Anything else you want to tell me.
19 Anything I forgot to ask you?

20 MR. RAMES: (Laughing.)

21 THE WITNESS: (Witness shakes head).

22 MR. RAMES: Are we done?

23 (Whereupon the deposition concluded

24 at 3:07 p.m.)

25

CERTIFICATE

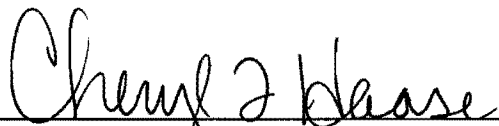
C-E-R-T-I-F-I-C-A-T-E

1
2
3 I, CHERYL L. HAASE, a Registered Professional Reporter
4 and Notary Public No. NP-158-03 for the U.S. Virgin Islands,
5 Christiansted, St. Croix, do hereby certify that the above
6 and named witness, ELIZABETH GOGGINS, was first duly sworn
7 to testify the truth; that said witness did thereupon
8 testify as is set forth; that the answers of said witness to
9 the oral interrogatories propounded by counsel were taken by
10 me in Stenotype and thereafter reduced to typewriting under
11 my personal direction and supervision.

12 I further certify that the facts stated in the caption
13 hereto are true; and that all of the proceedings in the
14 course of the hearing of said deposition are correctly and
15 accurately set forth herein.

16 I further certify that I am not counsel, attorney or
17 relative of either party, nor financially or otherwise
18 interested in the event of this suit.

19 IN WITNESS WHEREOF, I have hereunto set my hand as such
20 Certified Court Reporter on this the 6th day of January,
21 2010, at Christiansted, St. Croix, United States Virgin
22 Islands.

23 

24 Cheryl L. Haase, RPR
25 My Commission Expires 1/26/12