

Excerpts from the deposition of Sebastian D'Elia, begins with question regarding compensation for working on partisan political campaigns:

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A I volunteered on – I volunteered my time on campaigns

Q So was this payment for get out the vote efforts, if you understand what that phrase means?

A Correct, I do. It might have been for expenses I incurred in volunteering. Could have been for variety of things that I did.

Q How is the – how does the county of Union track vacation time for – for you? Do you have a particular way that you handle your vacation time?

A What do you mean?

Q Do you have to make a formal request to take a vacation day, send an e-mail to the County manager or someone in the organization to advise them that you're using vacation time?

A I verbally communicate with the County manager

Q As to – as to vacation time?

A Uh-huh.

Q Would that be the same as to sick days or personal days?

A Personal days I verbally communicate to him. Sick days I may call in. I call in, obviously, if it's a sick day.

Q Do you know whether – do you know whether there is any written recordation – whether there is any written recordation of your vacation, personal or sick days as a county employee?

A Written recordation – what do you mean?

Q Does someone keep a written record?

A Time sheets, if that what you mean.

Q Well, of your – you said you advised – you advised verbally of vacation and and personal days. You advised the County manager?

A Uh-huh

Q Does he then – does he or someone else then mark that down, keep track of it; or is it just –

A Not that I'm aware of.

Q It's up to you guys to make sure you stay within whatever your allotment is?

A I can't speak for the County manager. I don't know what his process is.

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Q Have you ever worked on partisan political campaign materials while in the Union

County Administration Building?

A No.

Q Have you ever accessed your work computer to draft statements or press releases or speeches on behalf of political candidates?

A No.

Q Have you utilized your Union County e-mail to distribute any partisan political campaign materials?

A No

Q Do you have a computer in the Union County Administration Building?

A Yes

Q Is that a computer owned by the County of Union?

A Yes

Q Do you have more than one computer in your office?

A One, only one.

Q You only have the one Union County-issued computer?

A Uh-huh.

Q Do you own a personal computer?

A Yes

Q Is that at your home?

A Uh-huh. I have a laptop too.

Q Do you bring your laptop into the – into the office in Union County Administration Building?

A My own laptop. I have my own laptop I have.

Q It's your personal laptop?

A Right, personal laptop I have.

Q And do you utilize that laptop to work on partisan political campaign materials?

A I have used my laptop.

Q For that purpose?

A Uh-Huh

Q. Yes?

A Yes, I have used my laptop.

Q Have you used it when you had been in the county administration building?

A No.

Q What would be the reason you would bring your laptop to the office?

A I – well, I always carry my laptop around with me, in case I have to leave the office and do – do work, you know, someplace else. I don't have a county laptop, so I can use that laptop in case I need to have something around during emergency.

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Q. When you worked on political campaigns, how many political campaigns would you say you worked on?

A Oh, I don't know. It's hard to say. One a year I would say.

Q More than six?

A One a year.

Q Pardon me?

A One a year.

Q For the last 15 years?

A No, no for the last six years.

Q Okay. And you said you were involved in making up campaign literature?

A I may have, yeah, literature. What do you mean "making up"?

Q You helped write –

A I might

Q mailings?

A I might – I may have edited some, not written some, yeah.

Q Some of them that I have seen are very pointed. Were you involved in writing pointed castings –

A No.

Q – Casting candidates in an unfavorable light?

A No.

Q Which campaigns were you involved in that you – which you edited or wrote campaign literature?

A Freeholder campaigns.

Q The last one? And which Freeholder – which group were you?

A I'm sorry, last one – I don't know if I wrote anything for the last one. Might have been a few years.

Q What year?

A '07, '06 maybe. When was the last one '07? No '06 maybe, '05.

Q You wrote some of the mailings?

A I wrote – I may have written or edited some letters, and that was it.

Q Letters that were sent out to the general public?

A Yeah.

Q And what did those letters say?

A Just talked about some of the accomplishments the Board did. That was it.

Q Did you keep copies of the items that you edited or that you wrote?

A No.

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Q Would you - would you consider yourself politically active?

A I am politically active, yes.

Q I'll rephrase the question that was pending. Have you volunteered for political campaigns in Union County say since -- from 2005 on have you performed some volunteer work for campaigns, political campaigns? Yes?

A Yep - yes, sorry.

Q Have you ever served as a campaign manager for a political campaign during that period of time?

A Not for the Freeholder Board. I've been involved in campaigns but never been a campaign manager.

Q You have been involved in the Freeholder campaigns?

A Yeah.

Q Have you — what types of volunteer services have you performed for the Freeholder campaigns?

A Wide variety of activities. I've distributed flyers. I've stuffed envelopes I've made phone calls. I've got out the vote, knocked on doors.

Q You'd say typical grass roots type campaign?

A Uh-huh.

Q Have you assisted the Freeholder campaign in preparation for public debates?

A They've asked me to, and I helped.

Q The question was have you — have you worked as a — as a challenger at the polls on election days?

A Yeah, I have.

Q All right. And have you — have you accompanied Freeholder candidates on interviews with the press?

A I have.

Q Did you attend any interviews?

A Yes, I believe I did.

Q How about in 2006?

A Yes.

Q Okay. And 2005, as well?

A Yes.

Q And again, this is not ~

A There were numerous —

Q Right.

A — interviews, numerous interviews with various publications; and I don't do all of them.

Q And would you use — would any of these interviews be during the day?

A Some have been during the day, uh-huh.

Q Have you used vacation time or personal days to attend those meetings?

A I may have, yes.

Q When you say you may have, does that mean —

A I have used off time.

Q you may or may not have?

A No, I have used off time, my off time, which is vacation, personal, comp time, two, three.

Q Do you recall being at the — being at any polls in Hillside in April of 2006?

A Yes, I do.

Q And in what capacity were you at the — where — sorry. Where were you -- was there a

particular place that you stationed yourself in Hillside during the April 2006 elections?

A I — I volunteered my time and I asked where I was needed and I went to where I was needed.

Q Who instructed you where — where to go?

A Well, I was — I was asked by Peter Corvelli if I could help. And then I asked Charlotte DeFilippo where she needed me.