

**Interrogatories for Dianne Keisel, Annette Kreitzer, Janice Mason, Nicki Neal,
Michael Nizich, Kris Perry, and Brad Thompson**

The purpose of this investigation is to look into the events and circumstances surrounding the termination of former Public Safety Commissioner Walt Monegan.

You have indicated that you wish to cooperate with the investigation. You are being asked to answer a series of questions. Your answers must be in writing. Your answers must be accompanied by a certification that your answers have been given under oath, and under penalty of perjury.

You may be asked to answer follow-up questions.

The questions ask for information about your actions and communications, as well as the actions and communications of others.

1. What positions have you held in the Palin administration? Describe the date your employment began and the dates of each position.

I was initially hired with the State of Alaska, Division of Risk Management as a claims examiner on January 15, 1981, later promoted to claims manager and deputy director, and ultimately appointed division director in July of 1993. I have held that same position throughout the Palin administration.

The next series of questions ask about 'communications,' which is defined here in its normal sense: the exchange of thoughts, messages, or information, as by speech, signals, or writing. Communications include, but are not limited to, information either sent by you or received by you, whether in person, by telephone, or via e-mail or other electronic means such as texting. The term also includes any written document. The term also includes communication through or from third parties. For example, "Tell the Governor that Walt Monegan is doing a good job," is a communication both to the person to whom you were speaking, or e-mailing, or texting, etc., and it is also a communication to the Governor.

For each communication, describe the content of the communication, and the context, i.e., the date, time and place of the communication. Also describe others who may have been present or included in the communication. For example, describe whether the communication was delivered or received in a meeting, or through an e-mail sent to several recipients.

1. What communications have you had with Governor Sarah Palin regarding Walt Monegan?

I do not recall any communications with Governor Palin regarding Walt Monegan.

2. What communications have you had with Governor Sarah Palin regarding Mike Wooten?

I do not recall any communications with Governor Palin regarding Mike Wooten.

3. What communications have you had with Todd Palin regarding Walt Monegan?

I do not recall any communications with Todd Palin regarding Walt Monegan.

4. What communications have you had with Todd Palin regarding Mike Wooten?

As best I can recall, in early April of 2007, Frank Bailey told me that Todd Palin wished to report his concerns regarding an Alaska State Trooper snow-machining while off work and receiving workers' compensation time loss benefits. At the time Frank Bailey was a special assistant to the Commissioner of Administration and occupied an office adjacent to mine on the 10th floor of the state office building. Frank asked if it would be OK to have Mr. Palin call me directly and I agreed that would be best. Todd Palin later called and described his sighting of Mr. Mike Wooten riding a snow machine. Mr. Palin expressed concern that a state employee was able to receive workers' compensation time loss benefits and could also be snow machining to this remote area. I thanked Mr. Palin for his report and confirmed that I would look into the matter.

It is also my recollection that Frank Bailey forwarded on to me an email that I understood was initiated by Todd Palin on the same subject at that same time period. I did not communicate with Todd Palin about the email.

5. What communications have you had with Mike Tibbles regarding Walt Monegan?

I do not recall any communications with Mike Tibbles regarding Walt Monegan.

6. What communications have you had with Mike Tibbles regarding Mike Wooten?

As best as I can recall at this time, Mike Tibbles phoned me at the office and later stopped me on the street to discuss the current status of Mr. Wooten's workers' compensation claim on at least two occasions; I believe those conversations occurred in the time frame of late April or early May, 2007. Mike used to be my direct supervisor as Deputy Commissioner with the Department of Administration so he was familiar with Risk Management's role and responsibilities handling state employee work related injury claims. I briefed him on the current claims status at that point. I may have mentioned the contact by Todd Palin, although I have no specific recollection.

I also remember participating in a meeting in Chief of Staff Mike Tibbles' office, also with Kevin Brooks and Nicki Neal, and Dianne Kiesel (connected by phone from Anchorage as I recall) regarding Mike Wooten. I think it was November 19th, 2007. During that meeting I updated Mike and the others on the then current status of Mr. Wooten's workers' compensation claim: Mr. Wooten was then recovering from successful surgery paid for by his employer funded health plan, he was expected to be able to return to full duty without limitation, and he was being represented by Chancy Croft and had been recently deposited by the AAG handling the workers' compensation claim.

7. What communications have you had with Annette Kreitzer regarding Walt Monegan?

I do not recall any communications with Annette Kreitzer regarding Walt Monegan.

8. What communications have you had with Annette Kreitzer regarding Mike Wooten?

At the time I was working with the Department of Public Safety to return Mr. Wooten to modified work status to mitigate his time loss (see my response to questions 22 and 24 below), I may have informed Commissioner Kreitzer of those efforts, as there was an ongoing and continuing initiative from her to coordinate modified return to work on any eligible injured employees. It is possible but I do not recall specifically whether I used Mr. Wooten's case as an example in discussing how the PSEA injury leave provision gives injured employees no incentive to return to work. She may have been present when I reported to Deputy Commissioner Kevin Brooks the contact by Todd Palin regarding Mr. Wooten snow machining.

9. What communications have you had with Brad Thompson regarding Walt Monegan?

Not applicable this writer.

10. What communications have you had with Brad Thompson regarding Mike Wooten?

Not applicable this writer.

11. What communications have you had with Mike Nizich regarding Walt Monegan?

I do not recall any communications with Mike Nizich regarding Walt Monegan.

12. What communications have you had with Mike Nizich regarding Mike Wooten?

I do not recall any communication with Mike Nizich regarding Mike Wooten.

13. What communications have you had with Ivy Frye regarding Walt Monegan?

I do not recall any communications with Ivy Frye regarding Walt Monegan.

14. What communications have you had with Ivy Frye regarding Mike Wooten?

I do not recall any communications with Ivy Frye regarding Mike Wooten.

15. What communications have you had with Frank Bailey regarding Walt Monegan?

I do not recall any communications with Frank Bailey regarding Walt Monegan.

16. What communications have you had with Frank Bailey regarding Mike Wooten?

Beyond the communications described in my response to question 4, I believe that I had further discussions with Frank Bailey, explaining to him the state's procedures and claim handling processes as an authorized self insured employer. In each claim a signed medical release from the claimant authorizes the state and its third party claims administrator to gather related medical and employment records and enables sharing of the information with the current employer. I believe I informed Frank of the PSEA contract clause providing up to a full year of administrative leave for line of duty injuries. I have no recollection of dates but it is likely that I kept Frank apprised with the current status of Wooten's claim – the scheduling of an employer's independent medical examination (EIME) and the subsequent controversy filed on April 18, 2007, and coordination with the Department of Public Safety attempting to return him to work in a modified position. During this time Frank was a special assistant to the Commissioner of Administration; Frank left the Department of Administration soon thereafter and I had no further contact with him regarding Mr. Wooten.

17. What communications have you had with Randy Ruaro regarding Walt Monegan?

I do not recall any communications with Randy Ruaro regarding Walt Monegan.

18. What communications have you had with Randy Ruaro regarding Mike Wooten?

I do not recall any communications with Randy Ruaro regarding Mike Wooten.

19. What communications have you had with John Glass regarding Walt Monegan?

I do not recall any communications with John Glass regarding Walt Monegan.

20. What communications have you had with John Glass regarding Mike Wooten?

I do not recall any communications with John Glass regarding Mike Wooten.

21. What communications have you had with Audie Holloway regarding Walt Monegan?

I do not recall any communications with Audie Holloway regarding Walt Monegan.

22. What communications have you had with Audie Holloway regarding Mike Wooten?

I can recall only one conversation with Colonel Holloway regarding Mike Wooten – it was a teleconference call arranged by Kim Peterson, then a Special Assistant with the Commissioner of Public Safety's office. We discussed arrangements to return Mr. Wooten to a modified position. I subsequently emailed to Colonel Holloway a copy of the EIME report on April 18th detailing the physician had released Wooten to return to work as respects his work injury.

23. What communications have you had with other members of the Department of Public Safety regarding Walt Monegan?

I do not recall any communications with other members of the Department of Public Safety regarding Walt Monegan.

24. What communications have you had with other members of the Department of Public Safety regarding Mike Wooten?

I communicated with Kim Peterson of the Department of Public Safety on several occasions, on the phone and by email beginning in April through late May in 2007 regarding Mr. Wooten. Together we were working with Dianne Kiesel of the Division of Labor Relations attempting to return Mr. Wooten to a modified position.

25. What communications have you had with Kris Perry regarding Walt Monegan?

I do not recall any communications with Kris Perry regarding Walt Monegan.

26. What communications have you had with Kris Perry regarding Mike Wooten?

I do not recall any communications with Kris Perry regarding Mike Wooten.

27. What communications have you had with Nicki Neal regarding Walt Monegan?

I do not recall any communications with Nicki Neal regarding Walt Monegan.

28. What communications have you had with Nicki Neal regarding Mike Wooten?

As reflected in my answer to question six, Nicki Neal was a participant in the meeting with Mike Tibbles in November 2007. I have no specific recollection but I may have had other conversations with Nicki Neal regarding Mr. Wooten. I recall dealing with Dianne Kiesel and Kim Peterson of DPS, although Nicki may have also been present as well.

29. What communications have you had with Janice Mason regarding Walt Monegan?

I do not recall any communications with Janice Mason regarding Walt Monegan.

30. What communications have you had with Janice Mason regarding Mike Wooten?

I do not recall any communications with Janice Mason regarding Mike Wooten.

31. What communications have you had with any other member of the Palin Administration regarding Walt Monegan?

I do not recall any communications with any other member of the Palin Administration regarding Walt Monegan.

32. What communications have you had with any other member of the Palin Administration regarding Mike Wooten?

As respects Mr. Wooten, the only other members of the Palin Administration that I can recall communicating with regarding Mike Wooten would be the Department of Law Torts and Workers' Compensation Section supervisor and the AAG assigned to handle the subsequent claim filed by Mr. Wooten's attorney in late July of 2007. There were several attorney-client communications regarding that matter until it was finally resolved by formal compromise and release in May of 2008.

33. What actions did you take involving Walt Monegan or Mike Wooten?

I am not certain that this question extends to all situations where I participated along with Walt Monegan - but he and I participated in several teleconferenced meetings of the disaster policy cabinet.

I participated as Commissioner Kreitzer's delegated representative for those periodic meetings to consider various potential disaster scenarios.

I do not recall other actions that I may have taken involving Mike Wooten that have not already been addressed in other answers already provided.

34. Are you in possession of any other information, including the actions and communications of others, regarding the events and circumstances surrounding the termination of Walt Monegan? If so, describe that information in detail.

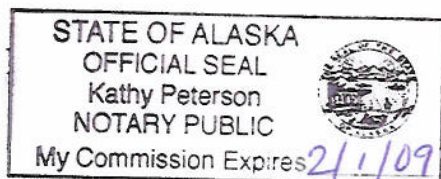
I have no recollection of any other information or communications regarding the events and circumstances surrounding the termination of Walt Monegan.

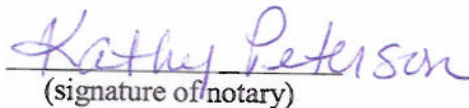
I certify under penalty of perjury that the foregoing is true.

Dated at Juneau, Alaska, October 8, 2008.


J. Brad Thompson

Subscribed and sworn to or affirmed before me at Juneau, Alaska on October 8, 2008.




(signature of notary)

Notary Public in and for Alaska