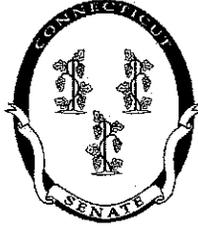


SENATE



Co-chairs

Senator Martin M. Looney
Senator Andrew W. Roraback

Members

Senator Donald J. DeFronzo
Senator Anthony Guglielmo
Senator William H. Nickerson
Senator Andrea L. Stillman

BIPARTISAN COMMITTEE OF REVIEW

October 24, 2007

Attorney Craig A. Raabe
Robinson and Cole
280 Trumbull Street
Hartford, CT 06103-3597

Dear Attorney Raabe:

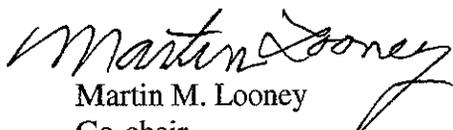
As agreed to at the October 15, 2007 meeting the Bipartisan Committee of Review is submitting written questions for Senator DeLuca to answer under oath. The enclosed questions are in addition to those asked at such meeting. We refrained from reducing to writing questions asked at the meeting because of a conversation you had with our staff indicating Senator DeLuca's intention to attest under oath to the responses he gave. If Senator DeLuca does not intend to provide the committee with an attestation to his earlier responses, please let us know by October 25, 2007 and we will send you those questions in writing for written and sworn responses.

Please provide the committee with Senator DeLuca's sworn responses to the enclosed questions by 2:00 p.m. on October 30, 2007. If any of the questions are unclear, please let us know by contacting Attorney Sandra Norman-Eady at 860-240-8400 as soon as possible and we will clarify them. Send the responses to:

Sandra Norman-Eady
Office of Legislative Research
Room 5300
Legislative Office Building
Hartford, CT 06106

If the responses are available in electronic form, please email them to Sandra.Norman-Eady@cga.ct.gov.

Sincerely,


Martin M. Looney
Co-chair


Senator Andrew W. Roraback
Co-chair

cc: Senator DeFronzo
Senator Guglielmo
Senator Nickerson
Senator Stillman
Senator DeLuca

1. It appears from the affidavits you supplied to the Bipartisan Committee of Review that Kathleen Hoyt and Garrett Reilly, the parents of your granddaughter, Casey Colella, claim to have observed bruises on their daughter. To the best of your knowledge, what did they do in response? If they did not intervene with law enforcement, why did you play that role?
2. You have claimed that, at some point, you learned that Mark Colella was physically abusing your granddaughter. When, and how, did you learn this? Before the committee on October 15, you testified that you learned this "early 2005, spring 2005, all in that general area." Please be more specific, and also indicate how you found out.
3. Prior to April 5, 2005, other than Waterbury Police Chief Neil O'Leary, your wife, and your granddaughter, did you speak with anyone else about the physical abuse of your granddaughter?
4. Did you or your wife ever speak with Sharon Reilly and Len and Maribeth Mecca, your granddaughter's aunts and uncle, about your granddaughter's relationship with Mark Colella generally? Specifically, did you or your wife ever speak with them about the alleged physical abuse?
5. Please describe every occasion on which you personally saw your granddaughter, Casey, between January 1, 2005 and April 5, 2005?
6. Did you personally observe signs of physical abuse to Casey during this timeframe? If so, what did you see, when did you see it, and where were you at that time?
7. Please indicate the dates and each and every occasion on which you observed signs of physical abuse of Casey since April 5, 2005. If so, what did you see, when did you see it, and where were you at that time?
8. Did you believe that abuse of your granddaughter had stopped when you introduced her, Mr. Colella, and their son on opening day of the Senate in January 2007?
9. Why was the committee not presented with photographs of Casey Colella's injuries that included her face, for identity purposes? Did you ever take any photographs of her injuries that included her face in the picture?
10. Whose camera was used to take photos submitted to the committee and what kind of camera was it?

11. Are there negatives of the photos available or are the photos available in a digital format?
12. Can you please provide all of the negatives from the roll of film if film was used?
13. If the photos were taken digitally, can you please provide the five photographs taken before and the five photographs taken after the photos submitted to the committee?
14. One of the photographs you submitted to the committee appears to show a serious laceration on the inside of an elbow. Is there now a scar on Casey at this spot?
15. Before you shared the photographs of your granddaughter with the FBI, did you or your wife tell anyone else about them, or show them to anyone else other than your granddaughter? If so, who?
16. To your knowledge, prior to April 5, 2005, did anyone from your family communicate to Mark Colella that your family wanted his marriage annulled? If so, when did this occur and who contacted him?
17. As of April 5, 2005, had you heard that your granddaughter was pregnant?
18. According to Chief O'Leary and newspaper reports, Ms. Reilly and the Meccas met with Chief O'Leary, separately from you, to discuss your granddaughter's relationship with Mark Colella. You also, in your June 7 press briefing, said that other of your family members had gone to the Chief. When you said that on the 7th, were you referring to Ms. Reilly and the Meccas? According to Chief O'Leary, this visit was in January of 2005. What can you tell us about your relatives' visits to the chief?
19. Please describe the times, places, and circumstances of your meetings with Chief O'Leary at which you requested his intervention. Were these casual encounters or did you make appointments to see him? Did they occur in a public place, such as a sidewalk or restaurant, or were they in the chief's office?
20. Did you prior to April 5, 2005 discuss Chief O'Leary's alleged refusal to respond to your reports of domestic abuse of Casey? If so, when and with whom did you discuss this?
21. Did you prior to April 5, 2005 suspect Mr. James Galante was on the fringes of organized crime? If so, what gave rise to that suspicion?

22. If you did have this suspicion, why did you look to him for assistance?
23. You testified to this Committee on October 15, 2007, that you did not discuss legislation impacting any of Mr. Galante's business interests with him directly. Did you at any point discuss legislative or governmental matters with any business associates of Mr. Galante or any lobbyists communicating on his behalf? If so, when, and what legislation or other governmental matter did you discuss?
24. Do you think you would have come to know Mr. Galante if you were not a state senator?
25. Do you think Mr. Galante would have agreed to meet with you if you were not a state senator?
26. In the second paragraph on page 2 of your Form 302, it reads:

DeLuca never asked [REDACTED] if [REDACTED] ([REDACTED]) knew anyone in Waterbury and never told [REDACTED] that he only wanted [REDACTED] to have someone talk to [REDACTED]. DeLuca was asked if he ever considered that the "visit" that [REDACTED] was going to have paid to [REDACTED] may involve violence. DeLuca said that he did not but did agree with the agents that the word "visit" could mean a lot of things. DeLuca was asked how he failed to realize that [REDACTED]'s "visit" may involve violence, when DeLuca never told [REDACTED] that he only wanted someone to talk to [REDACTED], when [REDACTED]'s writing the note on a piece of paper was done to avoid being recorded talking about it, which indicated that he was contemplating some type of illegal activity, and because he called [REDACTED] because [REDACTED] was on the "fringe of organized crime". DeLuca stated that he was in a state of panic and that it never occurred to him. DeLuca stated that approximately a week after meeting with [REDACTED], it occurred to him that the visit with [REDACTED] could accidentally escalate into violence but that he (DeLuca) quickly ruled that out and never asked [REDACTED] to cancel the "visit."

- a. Why, approximately a week after your meeting with Mr. Galante, did you rule out the possibility of physical violence?
- b. Did you ever tell Mr. Galante that you did not want violence inflicted on your grandson-in-law?

- c. Did you ever say to Mr. Galante that you just wanted your grandson-in-law warned or spoken with?

27. In the third full paragraph on page 3 of your Form 302, it states that you were suspicious of the undercover officer, in part because your “interactions with the UC were ‘not how [REDACTED] ([REDACTED]) worked’”. What name or names were redacted in this sentence? How did you know how they normally “worked”?

28. With regard to the events leading up to your meeting at FBI Headquarters on September 21, 2006, the third full paragraph of your Form 302 reads as follows:

On approximately September 19, 2006, DeLuca spoke to [REDACTED] about the UC. [REDACTED] is friends with [REDACTED] and told DeLuca that [REDACTED] wanted him (DeLuca) to contact him [REDACTED]. DeLuca stated that he did not contact [REDACTED] directly because he believed that the UC may be law enforcement and he didn't want the FBI to know that he was speaking to [REDACTED] about it. After the UC contacted DeLuca on September 21, 2006, DeLuca went to [REDACTED] and told [REDACTED] about the UC's call. [REDACTED] told DeLuca that [REDACTED] would get him a contact number and later provided DeLuca with a telephone number for [REDACTED], [REDACTED] that works for [REDACTED] to try to confirm that the UC was a messenger from [REDACTED]. DeLuca told [REDACTED] about the UC. DeLuca told [REDACTED] about the money that the UC had attempted to give him but did not mention the [REDACTED] matter. DeLuca said that he either told [REDACTED] that the UC may be with the FBI or implied that he might be. DeLuca, who had recorded the UC's phone number, gave it to [REDACTED] and described the UC to [REDACTED]. [REDACTED] told DeLuca that [REDACTED] ([REDACTED]) would not meet with the UC if [REDACTED] was DeLuca. DeLuca told Grunder and Waterman that the logical thing was that the UC was law enforcement.

- a. Please reproduce the above Form 302 excerpt and supply all of the redacted names and pronouns to the best of your ability.
- b. Why did you feel the need to inform anyone, other than the FBI, about the undercover agent?

- c. As of September 19, 2006, did you already suspect the person you had met with on September 5 and 7 was a federal agent? What gave rise to your suspicion?
 - d. As of that date, did you know that Mr. Galante had been indicted by the federal government on many counts?
 - e. Other than the FBI, who did you speak with on September 21, 2006 about the undercover agent? Specifically, to whom did you describe the undercover agent, give his telephone number, and tell that the undercover agent had attempted to bribe you?
 - f. Who told you that if they were you, they “would not meet with the undercover agent”? Did they tell you this before you met with the FBI at FBI headquarters?
 - g. Why did you wait until September 21, 2006 to tell the FBI that you had lied to them on September 7, 2006?
 - h. How did you wind up meeting with the FBI at their headquarters on September 21, 2006? Did they contact you first on that day, or did you call them to ask if you could come in?
 - i. A phrase in the above excerpt reads “...but did not mention the [REDACTED] matter”. What word was redacted in that phrase?
29. With regard to your September 5, 2006 meeting with the federal undercover agent, paragraph 10 of the arrest warrant affidavit reads as follows:

During the course of the investigation, I have learned that DeLuca has a close and confidential relationship with Businessman A, one that would explain why DeLuca would seek out Businessman A’s assistance and why Businessman A would be willing to help DeLuca. For example, on September 5, 2006, an undercover federal agent, posing as an associate of Businessman A, met with DeLuca. During that discussion, DeLuca told the undercover agent that “anytime [Businessman A] needs anything, anything, anything within my power, that I can do, I will do.” DeLuca also told the undercover agent that he was “shocked” when Businessman A was indicted, because he [Businessman A] is not a careless guy.” DeLuca said “it had to be some, some bastard, but, you know, he’s not a careless man.” DeLuca advised the undercover agent that “if you guys need me anymore” the best

way to make contact was through a specific individual, because "nobody knows [about] that relationship."

Who is the individual referred to in that last sentence, that you told the undercover agent was the best way to make contact with you again? Is it the same person who was referred to as a lobbyist in your Form 302?

30. Did either you or your attorney ever have in your possession a copy of any form of recording or transcript of the FBI's recordings of your September 5 and 7, 2006 meetings with the federal undercover agent? Do either you or your attorney currently have such a tape or transcript in your possession? If not, and if you or your attorney ever had a copy, what did you do with it?