

1 Q. Well, what did they tell you?

2 MR. BRADLEY: Objection. It's asked and answered three  
3 times.

4 THE WITNESS: If he touches her they can arrest him for  
5 sexual harassment.

6 Q. BY MR. FEIBLEMAN: Do you mean if he hugs her?

7 A. I don't know.

8 Q. If he holds her by the hand and takes her to the  
9 zoo that touching would be a crime?

10 A. I don't know. She said if he touches her then  
11 they can file sexual harassment charges.

12 Q. They didn't describe what they meant by  
13 "touching"?

14 A. (Witness shakes head from side to side.)  
15 They said she said she did not want to be touched.

16 Q. Have you accused Mr. Holcomb of assault in the  
17 past?

18 MR. BRADLEY: First of all, when you refer to Mr.  
19 Holcomb --

20 MR. FEIBLEMAN: Mr. Holcomb, Sr.

21 MR. BRADLEY: Answer.

22 THE WITNESS: Yes.

23 Q. BY MR. FEIBLEMAN: And did you call the police  
24 about that?

25 A. Yes, I did.

1 Q. And did you want him arrested for assault? You  
2 filed a criminal complaint, didn't you?

3 A. Yes, I did.

4 Q. And that was a lie, wasn't it?

5 A. Yes, it was.

6 Q. And was that statement that you gave the police  
7 under oath?

8 A. No.

9 Q. In fact you later confessed to someone that you  
10 had lied about your allegation of assault against Mr.  
11 Holcomb; isn't that true?

12 A. Probably.

13 Q. Was there a woman -- Did you talk to Mr. Holcomb,  
14 Jr.'s wife or ex-wife about it at all?

15 A. No.

16 Q. Did you ever contact the police and tell them that  
17 you had made it up?

18 A. No.

19 Q. Why not?

20 A. Nothing was done about it.

21 Q. Well, does it bother you at all that you made a  
22 false criminal report against Mr. Holcomb --

23 A. Yes.

24 Q. -- and that that is on record and you've never  
25 done anything to rectify that false allegation?

1 A. It bothered me that I did that, yes.

2 Q. Why did you make a false allegation against Mr.  
3 Holcomb?

4 A. I had sat in court -- I sat in court watching him  
5 lie continually and I tried everything within my power to  
6 protect my daughter. And so I made the mistake of trying to  
7 win the way he wins.

8 MR. BRADLEY: Do you have some tissue?

9 MR. FEIBLEMAN: You're pointing out some of the failings  
10 of our office.

11 (Short recess taken.)

12 Q. BY MR. FEIBLEMAN: Are you done with your answer?

13 A. (Witness nods head up and down.)

14 Yes.

15 Q. So since you weren't successful in the trial -- Is  
16 this while the appeal was pending that you made this false  
17 charge of assault against Mr. Holcomb?

18 A. I don't remember.

19 Q. Do you remember when it was that you made the  
20 charge?

21 A. I lived in Salem, Oregon, then.

22 Q. Well, you haven't mentioned Salem, Oregon, in any  
23 of your list of where you have lived in your earlier  
24 testimony so when did you live in Salem, Oregon?

25 A. Before I moved to Sweet Home.