



SWORN STATEMENT

OF

CHARLES EDWARD CUTSHALL

DATE: May 8, 1979.

PLACE: Law office of Thomas M. Dattilo, Madison, Indiana.

TIME: 4:30 P.M.

PRESENT: Thomas M. Dattilo, Attorney for Save The Valley.  
Mr. Robert Gray, Chairman of Board of Directors,  
Save The Valley.  
Mr. Paul Richard Hill, accompanying Charles Edward  
Cutshall.  
Mr. Charles Edward Cutshall, the witness.  
Mrs. Patricia S. Torline, the reporter.

The witness, Charles Edward Cutshall, having been duly sworn by the reporter to tell the truth, the whole truth and nothing but the truth, gave the following statement, to-wit:

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PATRICIA S. TORLINE  
 SHORTHAND REPORTER  
 RT. 6, BOX 2A  
 MADISON, INDIANA 47250

8005230617G

QUESTIONS BY MR. ROBERT GRAY:

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3 MR. GRAY: This is Bob Gray, and we're going to talk briefly  
4 to Charles Cutshall; and we understand he's em-  
5 ployed at the Marble Hill construction site.

6 Q. Might I ask your full name, Mr. Cutshall; what you  
7 do for a living; your marital status, and your age,  
8 please?

9 - A. My name is Charles Edward Cutshall; I am a laborer  
10 for Newberg Construction Company; my age is 22.

11 Q. Are you married, sir?

12 A. I am single.

13 Q. Could you tell us briefly what you do at the New-  
14 berg construction site at Marble Hill; just tell  
15 us briefly what you do there and how long you've  
16 been employed with them?

17 - A. I am a concrete finisher's helper, a laborer. I  
18 help concrete finishers by hauling their necessary  
19 materials to them and building their scaffolds and  
20 just general handyman for them.

21 Q. How long have you been employed in this position?

22 A. Two (2) months.

23 Q. Where were you employed before this?

24 A. I was employed by Wackenhut Security for P.S.I.

25 Q. On the Marble Hill site?

26 A. On the Marble Hill construction site.

27 Q. And how long had you been employed in that capacity,  
28 then, Mr. Cutshall?

- 1
- 2 A. I was employed from June - I mean January of '79 un-
- 3 til my employment as a laborer.
- 4 Q. Okay. In pre-conversation you indicated that you
- 5 were going to leave this type of employment as a
- 6 cement finisher and go somewhere else?
- 7 A. Yes sir. I'm going to stay on as a laborer, not for
- 8 the Newberg Company. I am moving to Texas.
- 9 Q. Can you tell us, Mr. Cutshall, then essentially,
- 10 why you're here? Just make it informal and tell us
- 11 what you know about cement, and just take off and
- 12 do your own thing as you youngsters say.
- 13 A. Okay. I live in the area of the Marble Hill con-
- 14 struction site. I live -
- 15 Q. (Interrupting) Can you be specific where?
- 16 A. Approximately 5 miles southeast of Austin, Indiana.
- 17 Q. Okay, go ahead. That would be in Scott County?
- 18 A. Scott County.
- 19 Q. Go ahead.
- 20 A. I've been around concrete work all my life; my
- 21 father's been a finisher for close to 50 years.
- 22 I'm familiar with concrete work.
- 23 Q. Have you worked previously with your Dad, in con-
- 24 crete?
- 25 A. Yes sir.
- 26 Q. What time frames; like how long?
- 27 A. Just small pours - patios and sidewalks and things,
- 28 for instance.

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Q. Go ahead, please.

A. I'm concerned about the conditions of the concrete and things I have seen on the Marble Hill construction site, pertaining to honeycomb patches.

Q. Please explain each now. Honeycomb is what in cement?

A. Honeycomb patches are air pockets that form long forms, when the concrete forms, that leave air pockets in the concrete where you can - the material's real loose and just falls out.

Q. You mean more narrow perhaps; less concrete in thickness, or what happens with a honeycomb?

A. If a form is, say for instance, four (4) feet thick-- or the concrete would be <sup>a</sup>four (4) feet thick wall and has a honeycomb on the side, it might go in as much as two (2) or three (3) feet into it and have the air pocket to where the concrete is loose. You can just beat it out with a hammer, and in some cases it'll fall out on its own - just breaking it with your hand.

Q. Thus leaving it much more narrow than the specifications would call for?

A. Yes sir.

Q. Okay, and you've seen this at Marble Hill?

A. Yes sir. It is one of my jobs to patch these -- to supply materials for the finishers to patch these areas.

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- Q. Okay, what structures have you been working on down there?
- A. Steam tunnels, just... (pauses)
- Q. Containment building? Have you ever been on the containment?
- A. Containment side of the containment -- inside of the containment.
- Q. The containment room itself?
- A. Yes sir.
- Q. Both inside and outside?
- A. Yes sir.
- Q. And you've seen honeycombs in the containment structure, itself?
- A. Yes sir.
- Q. As I understand then, it's part of your job to go around and patch these honeycombs as they occur?
- A. It is my job to supply the materials for the finishers to patch.
- Q. To do this?
- A. Yes sir.
- Q. I see. Okay, what was the next item, beside honeycombs, that you talked about?
- A. In one steam tunnel, along the -- where the wall meets the floor on the perpendicular corners, I've seen water leaking through these areas at a pretty fast rate. I'd say approximately anywhere from five (5) to twenty (20) gallons an hour; and water

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2 comes from the lower levels and outside levels, out-  
3 side of the walls, just where the water's backed up,  
4 and places I don't even know.

5 Q. Explain the steam tunnel; what do you know about  
6 that?

7 A. Well, all I know on the steam tunnel is that that's  
8 where the excess steam, and the steam after it's  
9 run through the turbines, follows these steam tunnels  
10 to where they're released through the cooling bins.

11 Q. Okay, what -- have you observed why this is so?  
12 Why is it leaking through from ground water, or what-  
13 ever?

14 A. The -- just poor concrete work, just poor forms.

15 Q. Like poor forming that causes the seam not to be  
16 sealed, or what? What exactly?

17 A. Just where the air pockets will run all the way  
18 through to where the water will be on these seams,  
19 in corners.

20 Q. Would this have to do with the honeycomb situation  
21 that you talked about?

22 A. Yes sir, more than -- it's my idea that there's  
23 honeycombs on in the wall to where the water can run  
24 on through. There's -- the water has to be flowing  
25 from someplace to be coming out of there, and I'm  
26 not sure where it's coming from; but it is coming  
27 through.

28 Q. What other cement defects, besides honeycombing, do

- 1
- 2 you know about; and have you seen it at Marble Hill?
- 3 - A. On patches, I have seen five (5) cases within the
- 4 last two (2) weeks where the supervision -- Newberg's
- 5 supervision, their supervisor or superintendent, and
- 6 other P.S.I. officials will say patch them before
- 7 the inspectors can come by on patches that should
- 8 have been air-hammered out and -
- 9 Q. (Interrupting) Does this go back to the honeycomb
- 10 situation you talked about?
- 11 A. Yes sir.
- 12 Q. Okay, you're talking now about a patching situation?
- 13 A. Yes sir. Well, you have to patch the honeycombs.
- 14 Q. And this then was 'patch it before the NRC people
- 15 could see it', did you say?
- 16 A. Yes sir, on numerous counts. NRC is not there all
- 17 the time and they cannot keep up with what's going
- 18 on.
- 19 Q. Is it supposed to be the procedure that the NRC see
- 20 all honeycombs that appear, or what?
- 21 A. No sir; it's <sup>the</sup> procedure for Quality Control, or Q.A.,
- 22 inspectors to see.
- 23 Q. That's Newberg inspectors?
- 24 A. Newberg inspectors, to patch these -- to see these
- 25 areas, and they put a tag on it; and that's where I
- 26 was explaining to you, earlier.
- 27 Q. What kind of tag; what does it look like?
- 28 A. Non -- not serviceable, poor material tags where

1  
2 they have to -- after they put a tag on a honeycomb  
3 that hasn't been beat out, or air-hammered out, they  
4 have to air-hammer it out; and then the inspector  
5 has to come and look at it before they patch it, to  
6 make sure it's done right. And on the occasions I  
7 was talking about, the supervisors will have them  
8 cover up just the outside and not worry about the  
9 inside of the patches. Before the inspectors can  
10 get around, they'll have them just more or less mask  
11 over, cover up, the areas before the inspector can  
12 see it.

13 Q. So that somebody could understand, would it be fair  
14 to equate this with like plastering over an area  
15 rather than filling it up completely?

16 A. Yes sir, that would be a good way to put it.

17 Q. Thus leaving --

18 A. Areas in-between.

19 Q. -- an air bubble?

20 A. Right.

21 Q. Inside the -- although it would look solid?

22 A. Right. It'll just have an inch or so outer covering  
23 where they've slapped a patch on this honeycomb,  
24 and just made it look good from the outside. You  
25 can't tell the difference until you get in there  
26 and start beating it out.

27 Q. You said two or three times about beating it out;  
28 how do you do that?

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- 2 A. With an air hammer, that's what I meant; pneumatic  
3 air hammers. They're just jack hammers is what they  
4 are, with chisel bits.
- 5 Q. You mentioned something about the reinforcement and  
6 the fact that the concrete sometimes doesn't shake  
7 down through. Would you explain that situation?
- 8 A. Well, the reinforcement rod is placed close together  
9 in areas, to where the concrete cannot get in-between  
10 the reinforcement rod and the forms, to where it  
11 doesn't fill in the forms completely and leaves patch  
12 holes in it and honeycomb holes. It's not vibrated  
13 down right and it's poor concrete.
- 14 Q. Poor concrete?
- 15 A. That's what it would have to be. It'd be too rocky  
16 in places.
- 17 Q. In other words, the mix is wrong or something?
- 18 A. Right. When they start pouring the concrete, they'll  
19 have a real high rock content in it, right at the  
20 beginning, and then it'll come out to the right  
21 mixture after the beginning; but they'll pour this  
22 on in the beginning of the forms to start out with.
- 23 Q. Who's responsible for seeing that this is not done --  
24 or to see that it's done properly; and evidently  
25 it's not then. Who's responsible?
- 26 A. I would say the concrete superintendent, the finish-  
27 er superintendent, and the concrete pouring crews  
28 foremans and superintendent.

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Q. Are they supposed to be there when all concrete is poured?

A. They are; they're in pouring the concrete, so they're there. See, you -- when they pour concrete, you have pneumatic vibrators, electric vibrators, that vibrate the concrete on down into these, or into the honeycomb -- I mean into the rebar; and that's the reason for the vibrations, so you won't have honeycomb. But they're not doing it correctly, or the rebar's too close to permit the concrete to fill in these areas.

Q. Please explain that?

A. - Steel rebar is just reinforcement steel that's in concrete, so it can hold a heavier stress and -- well that would just be the main problem for them -- heavier stress.

Q. Have you known any occasions when the shakedown mechanism wasn't working at all?

A. I cannot honestly say that I've never seen them not vibrate concrete; they've always vibrated them, but they're not doing it right.

Q. Well, not doing it right is fairly general. Can you be more specific? Like do you know why it's not working properly?

A. They're not letting the concrete vibrate down into the holes into the places where the honeycomb develops, and that's what causes the honeycomb.

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They're... (pauses)

Q. A matter of time?

A. Yes, they're pushing it and they're trying to make it as fast as possible.

Q. In other words, if they'd let it vibrate longer it wouldn't develop honeycombs?

A. In my opinion, yes sir.

Q. Okay. You mentioned the possibility that an NRC inspector had seen this crack situation at one of the tunnels?

A. I was in a steam tunnel working with finishers that were patching a steam tunnel, and an NRC inspector came to the area. Now, I cannot say that he didn't write something down, but he, in my opinion, never took notice of the situation - of the cracks in the seams or the water coming through.

Q. How often does an NRC inspector come to inspect the cement situation?

A. I've seen, in my period of working there close to two (2) months, I've seen him I'd say three (3) times.

Q. Three (3) times?

A. Yes sir.

Q. How much cement would have been poured then in this period, in your judgment; could you tell?

A. Hundreds and thousands of yards of concrete.

Q. Is it a fair statement then to say that the quality,

1  
2 the Q.A. as you referred to, has to be done by New-  
3 berg, and the NRC really has no effective way. Is  
4 that fair to say?

5 A. That would be fair, because NRC' cannot be on the  
6 site, or they're not on the site; I guess they could  
7 be on the site all the time, but they're not on the  
8 site all the time; and when they are there my super-  
9 visors, and the people I work with, have notice be-  
10 fore they can even come on the site. It's my ex-  
11 perience, because I worked as a guard on the security,  
12 for P.S.I., that they're not allowed on the site  
13 without a P.S.I. escort.

14 Q. Not allowed?

15 A. No sir, they will not let them come into the site  
16 without having a P.S.I. escort; and this was what  
17 I was instructed to do if -- when I was working as  
18 a guard, and I'd be on the gate and an NRC man  
19 came in, I was to hold him there until P.S.I. was  
20 notified and come to escort him.

21 Q. In other words, if I came -- if you were a guard  
22 there and I came there and identified myself as an  
23 NRC inspector, I couldn't enter the premises until  
24 a P.S.I. person came to escort me?

25 A. Yes sir; unless it's changed in the last two weeks,  
26 that's the way it was.

27 Q. I see. Do you know any of the Newberg inspectors,  
28 personally?

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2 A. Not personally; I know them by sight.

3 Q. And these -- is this their only job, to inspect  
4 cement, or do they have just general inspectors?  
5 What is a Newberg inspector?

6 A. A Newberg inspector, the only one I'm associated  
7 with is the concrete inspectors, and I think their  
8 only job is to inspect concrete. I think, and I'm  
9 pretty sure, they have other inspectors for their  
10 carpentry work and iron works and this sort of thing.

11 Q. You told us something then about the apparent de-  
12 fects that are indeed in the structures right now;  
13 you know that they're there, is that right?

14 A. Yes sir.

15 Q. Back to the particular structures, you say the in-  
16 side and the outside of the containment room, itself,  
17 is affected; that you know that these things are  
18 covered up there?

19 A. Yes sir.

20 Q. The containment room, itself?

21 A. The containment walls sir, when I first started, was  
22 -- one of my first jobs was to help patch these  
23 holes on the side containment, inside and outside.  
24 They, majority-wise, they patch most of the holes  
25 according to qualifications, or according to the  
26 way it's supposed to be; but they have so many de-  
27 fects and holes that need to be patched that they  
28 can't get them all; and that's the reason, one reason,

1  
2 they've pushing the job so hard to try and get it  
3 done - that they're patching over these defects be-  
4 fore the inspectors can see them.

5 Q. And this is done purposely then, as you have pointed  
6 out?

7 A. Yes sir, it's the only way it could be. The super-  
8 visors say 'patch it over'.

9 Q. And they say that in so many words - a Newberg  
10 supervisor says that?

11 A. I've heard statements where, from the supervisor  
12 personnel, to say fill in certain holes or honeycomb  
13 in the side of a wall before the inspector can see  
14 it. I, myself, have helped with this by hauling  
15 the material and drypack to these holes and patches.

16 Q. We've asked you about the containment room, itself,  
17 and you also have talked about a steam tunnel; any  
18 other structures involved in this honeycombing and  
19 the cover-over, that you know of?

20 A. Your turbine room walls, your floors; there's all  
21 kinds of walls, concrete walls and floors that, see,  
22 are necessary, besides just the containment. You  
23 have places where your heat pumps or some generators  
24 are going to be, and just pipeworks and ductworks  
25 and things like this that the patches aren't right,  
26 too.

27 Q. In other words, the same situation in the things  
28 you've just mentioned then; those kind of rooms?

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A. I would say the majority is on other, the turbine rooms and things, instead of the containment. It is on the containment, too, but it seems there was more on the other areas.

Q. Can you tell us, Mr. Cutshall, about porosity of cement. We're all well aware of the Three-Mile Island situation and porosity cement, where radiation apparently can get through three and a half (3½) to four (4) feet of concrete. Is there any specifications you're aware of as to porosity of cement being poured at Marble Hill on various structures; or do you know anything about that?

A. I'm not real familiar with the term porosity; I've heard it mentioned by the NRC inspector. The information I have is through an NRC inspector, where he was telling me that radiation will leak through seams and honeycomb patches at a lot larger rate than if it was solid concrete and done right.

Q. But you're not familiar with concrete porosity as such?

A. I can't honestly say I am.

Q. Do you know who's furnishing this concrete?

A. Newberg Construction Company. They have their own batch plant and they mix their own concrete.

Q. Their own batch plant right on - ?

A. Right on the site.

Q. In other words, this is not a sublet proposition?

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- 2 A. No sir, they mix their own concrete.
- 3 Q. They're totally responsible, I see. So whatever mix  
4 they make, it's their responsibility all the way?
- 5 A. Yes sir. There's a testing, U.S. Testing Corporation,  
6 is the one that's responsible for testing the con-  
7 crete for the proper slump and the proper mixtures --  
8 slump is a water content, somehow to do with the  
9 concrete, and the right ratios of cement and sand  
10 and rock mixed together.
- 11 Q. And this is United States Testing Company, did you  
12 say?
- 13 A. Yes sir, U.S. Testing.
- 14 Q. Well, how are they involved? Do they just -
- 15 A. (Interrupting) That is their only job is to test  
16 the metal bars and test concrete and test heating  
17 points of different materials and so on.
- 18 Q. What's their relationship as inspectors or testers?
- 19 A. They're a sub-contractor to F.S.I., for Newberg.
- 20 Q. They're not the inspectors that you've talked about  
21 here?
- 22 A. No sir; this is different.
- 23 Q. What, exactly, do they do? I mean, do they not do  
24 it at the -- where it's poured -- or what?
- 25 A. Yeah, they -- the U.S. Testing right at the pour,  
26 right out of the concrete trucks, they take samples  
27 of concrete to test; right on the pours, before the  
28 --they take just, you know, samples out of the

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concrete trucks as it's going to a pour.

Q. And they would know, then, whether it was accurate and to specifications by these samples?

A. Yes sir.

Q. Do you have any reason to question their work?

A. No sir, because I'm not associated with them; all I know is I see them out there taking samples all the time.

Q. Are you aware of any of the training necessary, for either United States Testing people or the Newberg inspectors? What do they have to do to be what they are?

A. When I was looking for a job this winter, and I was hired on at the Wackenbut -- for Wackenbut Security, that's the security corporation that takes care of P.S.I. and job site security -- I acquired an application from U.S. Testing for work for them too, at the same time; I was trying, you know, trying to fill in two chances at one time. And they told me I could have got hired, you know, would have been hired if I'd wanted to go ahead and do it, and I had no prior training. They would train you as you went.

Q. Train you on the job; is that accurate?

A. They wanted people that had experience, but they told me that since I'd been around concrete and know how, you know, what concrete is made up of and a little familiar with the slump tests, and things

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like this, that they would go ahead and train me.  
Q. Train you as they were pouring; is that what they had in mind?

A. Yes sir. You have to understand that the job capacity that I would be fulfilling was more or less just taking the samples and things like this.

Q. What happens to the sample then?

A. They take it to their shop and they test it for the slump and numerous other tests, numerous other inspections I'm not familiar with.

Q. Have you ever had a bad batch?

A. I can't say that they have, because I'm not told; I'm just a laborer.

Q. Have you ever known a case where they've taken some cement out because it wasn't any good?

A. No sir.

Q. To try to get some perspective about this patching of air pockets and honeycombing; what are we talking about? The reference that I grew up with was like bigger than a bread basket. How big are we talking about?

A. I've seen patches as large as five (5) -- four (4) to five (5) feet in square, or honeycombs four (4) and five (5) feet square, that are patched in.

Q. Four to five feet in diameter --

A. Yes.

Q. -- like, would it come out like a hole?

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2 A. Yeah; in diameter, you know, they're irregular shapes.  
3 They're not necessarily a hole or rectangle; they're  
4 just irregular shapes.

5 Q. And sometimes quite deep, like a four feet wall clear-  
6 ing to three feet of it, or more, or less, or what?

7 A. A foot or -- I've seen patches or honeycombs that's  
8 went in a foot, and better.

9 Q. And do you see these as the form is removed?

10 A. Yes sir.

11 Q. Is that when you see them?

12 A. After the form is removed. You can't see them, be-  
13 cause of the forms, you know, blocking the sight  
14 of them, until they're taken off.

15 Q. Would this be the average, or would they be much  
16 smaller?

17 A. They're on the average -- well there really isn't  
18 an average. Like I say, they're irregular shapes  
19 and they might be anywhere from a couple of inches  
20 to four (4) feet in diameter.

21 Q. Okay, if there was an irregularity of a couple of  
22 inches, what would happen; you'd just go up and hit  
23 it with a hammer and see if the cement gave, or  
24 what?

25 A. Well, you could see it. It's just little holes, looks  
26 like honeycomb; that's the reason it's got the name.

27 Q. It'd be an area then, would it?

28 A. Yes sir, that would be honeycombed.

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2 Q. It could be then all the way from two inches to some-  
3 thing like five (5) feet in diameter --

4 A. Yes sir.

5 Q. -- the honeycombed areas that you're speaking of?

6 A. Yes sir.

7 Q. Have you ever known a case when an NRC inspector  
8 was on the site and knew of a honeycomb, and knew  
9 that it was being covered up?

10 A. No sir. My impression of the NRC inspectors was  
11 that they were pretty sharp men; they caught stuff  
12 that the supervisors would try to pull their leg  
13 on, try to - excuse the term - of bullshit on them,  
14 and they'd usually catch them on such things. But,  
15 again, the NRC inspectors, as I said, in a two-month  
16 period I've only seen him three (3) times. That's  
17 not saying he's not there more; but for where I'm at,  
18 and I'm dealing with the concrete work every day,  
19 I've only seen him approximately three (3) times.

20 Q. What survey view would you have of the concrete,  
21 personally? Would you see five percent of it, twenty-  
22 five percent of it; how much are you involved in the  
23 total concrete picture?

24 A. A hundred (100) percent.

25 Q. You see it all then?

26 A. Yes sir. That goes back to what I said before.  
27 I'm a concrete finisher's helper, I'm a laborer work-  
28 ing as a finisher's helper. My job is to stay with

1  
2 the finishers and keep them supplied, so I'm wherever  
3 the finishers are, pouring concrete or patching holes.

4 Q. In other words, if somebody would question this at  
5 some later time, they couldn't say well he only saw  
6 just five percent of the whole thing. You saw the  
7 entire -- you surveyed all of it then; you survey --

8 A. (Interrupting) Yes sir, I'm walking around the  
9 area every day, just gathering up materials, and  
10 there isn't five (5) percent of the areas that they've  
11 poured that I haven't seen.

12 Q. Okay. Is there anything else that you want to add  
13 here; anything that I haven't answered or asked you?  
14 Anything at all you'd want to say in a general state-  
15 ment here?

16 A. My main concern over the Marble Hill Nuclear Power  
17 Plant is that it's within a fairly close range of  
18 my home. I'm not against nuclear energy; in fact,  
19 I'm in favor of it. But I want to see it done right.  
20 I don't want to see things that I've explained prior  
21 in this tape go on and not be corrected, because I  
22 believe that such things that I've explained will  
23 definitely affect the workability of the nuclear  
24 power plant.

25 Q. Would it be reasonable to sum up then that you  
26 think that the quality is below standards at  
27 Marble Hill?

28 A. Yes sir.

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Q. Is there anything<sup>else</sup>/you want to say here, Mr. Cutshall?

A. No sir.

Q. Okay, this would continue the recorded interview;  
and you understand that this has been recorded and  
that you're under oath to tell the truth?

A. Yes sir.

MR. GRAY: This concludes the recorded interview.

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CONCLUSION OF STATEMENT.

C E R T I F I C A T E

STATE OF INDIANA )  
                          ) SS:  
COUNTY OF JEFFERSON)

I, Patricia S. Torline, do hereby certify that I am a Notary Public in and for the County of Jefferson, State of Indiana, duly authorized and qualified to administer oaths; That the foregoing sworn statement of Mr. Charles Edward Cutshall was taken by me in shorthand and on a tape recorder on May 8, 1978, in the law office of Thomas M. Dattilo, 344 East Main Street, Madison, Indiana; That the witness was duly sworn by me to tell the truth, the whole truth and nothing but the truth prior to giving said statement; That this statement has been reduced to typewriting by me and contains a complete and accurate transcript of the said statement.

I do further certify that I am a disinterested party in this matter.

WITNESS my hand and notarial seal this 26th day of May, 1979.

*Patricia S. Torline*  
\_\_\_\_\_  
Patricia S. Torline, Notary Public  
Jefferson County, State of Indiana.

My Commission Expires:  
May 30, 1980.