



Planet Depos[®]
We Make It *Happen*[™]

Transcript of Elissa Guitron Pitterle, Designated Representative

Date: June 19, 2019

Case: Judicial Watch, Inc. -v- U.S. Department of State

Planet Depos

Phone: 888.433.3767

Email: transcripts@planetdepos.com

www.planetdepos.com

Transcript of Elissa Guitron Pitterle, Designated Representative
Conducted on June 19, 2019

1 IN THE UNITED STATES DISTRICT COURT
2 FOR THE DISTRICT OF COLUMBIA
3 ----- x
4 JUDICIAL WATCH, INC., :
5 Plaintiff, :
6 v. : Civil Action No.
7 U.S. DEPARTMENT OF STATE, : 14-01242 (RCL)
8 Defendant. :
9 ----- X
10
11 Videotaped Deposition of U.S. DEPARTMENT OF STATE,
12 by and through its Designated Representative
13 ELISSA GUITRON PITTERLE
14 Washington, DC
15 Wednesday, June 19, 2019
16 10:09 a.m.
17
18
19
20 Job No.: 242902
21 Pages 1 - 275
22 Reported by: Debra A. Whitehead

1 Videotaped Deposition of ELISSA GUITRON
2 PITTERLE, held at the offices of:
3
4 U.S. DEPARTMENT OF JUSTICE
5 CIVIL DIVISION
6 1100 L Street, NW
7 Washington, DC 20005
8 (202) 514-2000
9
10
11 Pursuant to notice, before Debra A. Whitehead,
12 an Approved Reporter of the United States District
13 Court and Notary Public of the District of Columbia.
14
15
16
17
18
19
20
21
22

1 A P P E A R A N C E S
2 ON BEHALF OF PLAINTIFF:
3 RAMONA COTCA, ESQUIRE
4 LAUREN M. BURKE, ESQUIRE
5 PAUL J. ORFANEDES, ESQUIRE
6 MICHAEL BEKESHA, ESQUIRE
7 JUDICIAL WATCH, INC.
8 425 Third Street, SW
9 Suite 800
10 Washington, DC 20024
11 (202) 646-5172
12
13 ON BEHALF OF DEFENDANT:
14 JOSHUA E. GARDNER, ESQUIRE
15 STEPHEN M. PEZZI, ESQUIRE
16 ROBERT PRINCE, ESQUIRE
17 U.S. DEPARTMENT OF JUSTICE
18 FEDERAL PROGRAMS BRANCH
19 1100 L Street, NW
20 Washington, DC 20005
21 (202) 305-7583
22

1 A P P E A R A N C E S C O N T I N U E D
2 ON BEHALF OF DEFENDANT:
3 ELIZABETH SHAPIRO, ESQUIRE
4 U.S. DEPARTMENT OF JUSTICE
5 CIVIL DIVISION
6 20 Massachusetts Avenue, NW
7 Washington, DC 20530
8 (202) 514-2205
9
10 ON BEHALF OF DEFENDANT:
11 MICHAEL LIEBERMAN, ESQUIRE
12 ELIZABETH GROSSO, ESQUIRE
13 UNITED STATES DEPARTMENT OF STATE
14 2201 C Street, NW
15 Washington, DC 20520
16 (202) 647-6371
17
18
19 ALSO PRESENT:
20 JEREMY DINEEN, Video Specialist
21
22

5

C O N T E N T S

1	EXAMINATION OF ELISSA GUITRON PITTERLE	PAGE
2	By Ms. Cotca	9
3		
4		
5	E X H I B I T S	
6	(Attached to the Transcript)	
7	PITTERLE DEPOSITION EXHIBIT	PAGE
8	Exhibit 1 Plaintiff's Second Amended Notice	15
9	of Deposition Pursuant to FRCP	
10	30(b)(6)	
11	Exhibit 2 Summary of Searches Performed for	14
12	Documents Responsive to the TP	
13	FOIA Request	
14	Exhibit 3 Excerpts Concerning Knowledge of	42
15	E-mail Use	
16	Exhibit 4 Timeline: Secretary Clinton	
17	E-mail Use	
18	Exhibit 5 Processing of the CREW Request	42
19	Exhibit 6 Records Systems in S/ES	42
20	Exhibit 7 Timeline of Talking Points	42
21	Request	
22	Exhibit 8 Binder 1, CREW Request	90

6

E X H I B I T S C O N T I N U E D

1	PITTERLE DEPOSITION EXHIBIT	PAGE
2	Exhibit 9 Binder 2, Judicial Watch Talking	90
3	Points Request	
4		
5	Exhibit 10 Binder 3, Searches for Judicial	90
6	Watch Talking Points Request	
7	Exhibit 11 Binder 4, Personal E-mails	90
8	Exhibit 12 Binder 5, Benghazi	90
9	Exhibit 13 Binder 6, Miscellaneous	90
10	Exhibit 14 E-mail String, Ending from	198
11	Ms. Mills to Mr. Sullivan, et al.,	
12	9/29/12	
13	Exhibit 15 E-mail String, Ending from	246
14	Mr. Finney, to	
15	Ms. Austin-Ferguson, 8/27/14	
16		
17		
18		
19		
20		
21		
22		

7

P R O C E E D I N G S

1 VIDEO SPECIALIST: Here begins Disk
 2 Number 1 in the videotaped 30(b)(6) deposition of
 3 Elissa Guitron Pitterle in the matter of Judicial
 4 Watch, Inc., V U.S. Department of State, in the
 5 U.S. District Court for the District of Columbia;
 6 Case Number 14-01242.
 7 Today's date is June 19, 2019. The time
 8 on the video monitor is 10:09 a.m. The
 9 videographer today is Jeremy Dineen, representing
 10 Planet Depos. This video deposition is taking
 11 place at the offices of the Department of Justice,
 12 at 1100 L Street, Northwest, in Washington, DC.
 13 Would counsel please voice-identify
 14 themselves and state whom they represent.
 15 MS. COTCA: Ramona Cotca, for plaintiff
 16 Judicial Watch.
 17 MS. BURKE: Lauren Burke, for plaintiff
 18 Judicial Watch.
 19 MR. ORFANEDES: Paul Orfanedes, for
 20 plaintiff Judicial Watch.
 21 MR. BEKESHA: Michael Bekesha, for

8

1 plaintiff.
 2 MR. GARDNER: Josh Gardner, the United
 3 States Department of Justice, on behalf of the
 4 defendants.
 5 And the witness will read and sign.
 6 MR. PRINCE: Robert Prince, from the
 7 Department of Justice, on behalf of the defendant.
 8 MR. PEZZI: Stephen Pezzi, from the
 9 Department of Justice, on behalf of defendant.
 10 MR. LIEBERMAN: Michael Lieberman, from
 11 the Department of State.
 12 MS. GROSSO: Elizabeth Grosso, from the
 13 Department of State.
 14 VIDEO SPECIALIST: Thank you.
 15 The court reporter today is Debbie
 16 Whitehead, representing Planet Depos.
 17 Would the reporter please swear in the
 18 witness.
 19 ELISSA GUITRON PITTERLE,
 20 having been duly sworn, testified as follows:
 21 EXAMINATION BY COUNSEL FOR PLAINTIFF
 22 BY MS. COTCA:

9

1 Q Good morning, Ms. Pitterle.
2 Could you please state your name for the
3 record?
4 **A It's Elissa Guitron Pitterle.**
5 Q And can you please spell it.
6 **A E-L-I-S-S-A. Middle name is Guitron,**
7 **G-U-I-T-R-O-N. Pitterle, P-I-T-T-E-R-L-E.**
8 Q Okay. Thank you.
9 Have you ever been deposed before?
10 **A No.**
11 Q Okay. I'll go over with -- I'm sure you
12 discussed the rules of the deposition with your
13 attorneys, but we'll go over them.
14 You have just been sworn in by the court
15 reporter. Is there any reason why you would not
16 be able to answer truthfully today?
17 **A No.**
18 Q Okay. As you can tell, the -- there is a
19 court reporter here. And everything's being
20 transcribed that's being said here today.
21 To have a clear -- a clean record, it's
22 important that we don't speak over each other. So

10

1 I would ask -- well, I will do my part in trying
2 to make sure that I let you finish answering any
3 of my questions before I go to the next question.
4 But I would also ask, sometimes you may be able to
5 anticipate the question that's being asked. But
6 for the record's sake that it's clear, please just
7 let me finish asking the question, and then you
8 may answer.
9 Also, your attorneys may object. I would
10 also ask if they do object, give them time to
11 object as to what they need to say on the record.
12 And then if they do not instruct you not to answer
13 it, you may go ahead and answer after that.
14 Also, any nods of the heads are not going
15 to be able to be transcribed. So all of your
16 responses should be verbal.
17 Is that fair?
18 **A Yes.**
19 Q Okay. It is important that if you do not
20 understand a question that I ask, that you let me
21 know that you need clarification or if I can ask
22 it another way or that you don't understand it.

11

1 If you don't do that, then I will assume that you
2 had understood the question.
3 Is that fair?
4 **A Yes.**
5 Q Okay. As I mentioned, your attorney may
6 object in this case. You are still required to
7 answer the question unless there's an instruction
8 by your attorney not to answer. Okay?
9 **A Okay.**
10 Q All right. And then if you need a break
11 at any point, just let us know and we're happy to
12 break. All right?
13 **A Yes.**
14 Q All right. Now, I noticed that you have
15 a few documents in front of you. Did you bring
16 those documents with you here today?
17 **A They were brought by the attorneys.**
18 Q Okay. And what are the documents -- how
19 many documents do you have there in front of you?
20 **A Six.**
21 Q Six. And what are they, for the record?
22 **A They are some timelines and summaries and**

12

1 explanations.
2 Q Okay. May I just see them?
3 Thank you.
4 MS. COTCA: All right. For the record,
5 it's a summary of searches performed for documents
6 responsive to the TP FOIA request.
7 Q Is TP talking points?
8 **A Yes.**
9 Q Is that what it refers to?
10 And that's for this case?
11 **A Yes.**
12 Q And then Timeline of Talking Points
13 Request is the second document. The third is
14 Record System in S/ES. The fourth document,
15 Processing of the CREW Request. The fifth
16 document, Excerpts Concerning Knowledge of E-Mail
17 Use. And then the last one, Timeline Secretary
18 Clinton's E-Mail Use.
19 I'll hand these back to you.
20 Is that -- did I fairly represent the
21 documents that you have in front of you?
22 **A Yes.**

13

1 Q Okay.
2 MS. COTCA: Josh, are all of these
3 documents contained in the binders that --
4 MR. GARDNER: No. They're not.
5 MS. COTCA: Okay. Okay. I would ask
6 that can we get copies?
7 MR. GARDNER: Sure. Sure.
8 MS. COTCA: Of these documents?
9 MR. GARDNER: They're right here.
10 MS. COTCA: Oh, you have them.
11 MR. GARDNER: We do.
12 MS. COTCA: Oh, thank you.
13 BY MS. COTCA:
14 Q Did you bring here with you today
15 anything else outside of the documents you have in
16 front of you and the binders that we'll get to in
17 just a little bit that your attorneys have
18 prepared and provided us a copy before the
19 deposition?
20 A No.
21 Q Okay.
22 MS. COTCA: And just for the record, we

14

1 have six binders of documents. Josh, we're going
2 to enter those -- that as an exhibit. I'll review
3 them during a break, and then we'll come back and
4 put that on the record. Okay.
5 MR. GARDNER: Sure. Do you want to enter
6 into the record her copy so she can have that, and
7 you will still have yours?
8 MS. COTCA: Yes.
9 MR. GARDNER: We can do that.
10 MS. COTCA: Okay. Thank you.
11 You know what? Why don't we also mark
12 these six documents as Exhibit 1 -- Exhibit 2.
13 (Pitterle Deposition Exhibit 2 marked for
14 identification, retained by counsel.)
15 BY MS. COTCA:
16 Q All right. Ms. Pitterle, I'll show you
17 what's been marked as Exhibit 1. And that's a
18 copy of plaintiff's second amended notice of
19 deposition pursuant to Rule 30(b)(6).
20 MS. COTCA: I don't know. I don't think
21 I have enough copies for everybody.
22 MR. GARDNER: I think there's something

15

1 else there.
2 MS. COTCA: Is there anything else?
3 Okay.
4 (Pitterle Deposition Exhibit 1 marked for
5 identification, retained by counsel.)
6 BY MS. COTCA:
7 Q Have you seen this document before?
8 A Yes.
9 Q Okay. And this is a notice of your
10 deposition, or the deposition of a corporate
11 designee for the State Department, identifying ten
12 subject matters or topics that will be discussed
13 today. And I just want to go through them
14 briefly.
15 With respect to Item Number 1, the FOIA
16 request at issue in this case, are you prepared to
17 testify on that topic --
18 A Yes.
19 Q -- here today on behalf of the State
20 Department?
21 A Yes.
22 Q Okay. And then with respect to the

16

1 second item, the CREW's December 2012 FOIA
2 request, have you prepared to testify about this
3 topic --
4 A Yes.
5 Q -- here today?
6 Okay. And then what about Number 3, it's
7 initial discovery of and redaction to Hillary
8 Clinton's private e-mail use. Are you -- did you
9 prepare to testify about this matter here today?
10 A Yes.
11 Q Okay. And then Topic Number 4, it's
12 November 12, 2014, letter to Judicial Watch
13 regarding this litigation. And I believe that
14 this is a reference to the State Department.
15 Are you prepared to testify here today
16 about this topic?
17 A Yes.
18 Q Okay. What about Number 5, the December
19 31, 2014, joint status report; are you prepared to
20 testify about this topic today?
21 A Yes.
22 Q Okay. And then Subject Matter Number 6,

17

1 February 2, 2015, joint status report, ECF Number
2 11; did you prepare to testify here today about
3 this topic?
4 **A Yes.**
5 Q All right. Going on to the second page.
6 For Item Number 7, Preparing talking
7 points for former UN ambassador Susan Rice,
8 September 16, 2013, media appearances. I believe
9 that's a typo, and it should be two thousand --
10 MR. GARDNER: I'm sorry, counsel. I may
11 be having a different document than what you're
12 looking at. My Exhibit 1 has Topics 7 and 8 on
13 Page 1. Amended notice of deposition.
14 MS. COTCA: Oh. What do you have?
15 I'm sorry. I'm reading off the second
16 amended because we changed the location. It's the
17 same topics.
18 MR. GARDNER: That's fine. No, no, no.
19 I'm sure they are.
20 MS. COTCA: Okay.
21 MR. GARDNER: I just wanted to make sure
22 we're all on the same page, literally.

18

1 MS. COTCA: So the witness -- so it's the
2 second amended notice that's been marked as an
3 exhibit.
4 THE WITNESS: Okay.
5 MS. COTCA: Okay.
6 BY MS. COTCA:
7 Q Going back to Topic Number 7. Preparing
8 talking points for former UN ambassador Susan
9 Rice, September 16, 2013, media appearances.
10 Again, I believe that's a typo. It should be
11 September 13, 2012, media appearances.
12 **A Yes.**
13 Q Are you prepared to testify about
14 Ambassador Susan Rice's September 16, 2012, media
15 appearances?
16 **A Yes.**
17 Q Okay. Thank you.
18 With respect to Topic Number 8, the
19 advanced dissemination or discussion of those
20 topic -- of those talking points; are you prepared
21 to testify about this topic here today?
22 **A Yes.**

19

1 Q Okay. And then Topic Number 9, the
2 aftermath of Rice's appearances. Did you prepare
3 to testify here today on this topic?
4 **A Yes.**
5 Q Okay. With respect to the last item,
6 Number 10, the Department's evolving understanding
7 of the Benghazi attack. Did you prepare to
8 testify here today about this topic?
9 **A Yes.**
10 Q Okay. Thank you. Now that we got that
11 out of the way. What is your current job title at
12 the State Department?
13 **A I'm the acting deputy director of the**
14 **Office -- Office of Information Programs and**
15 **Services in the Bureau of Administration.**
16 Q Okay. And who is your supervisor?
17 **A Eric Stein.**
18 Q Okay. And what is his title?
19 **A He's the director of the office.**
20 Q Okay. Are you the only acting deputy
21 director of IPS, or are there any other deputies
22 at IPS?

20

1 **A I'm the only deputy.**
2 Q Okay. And generally speaking, what are
3 the duties and responsibilities of IPS?
4 **A There are several different lines of**
5 **effort. One is managing the Freedom of**
6 **Information Act program. Second is records**
7 **management. They're also responsible for other**
8 **access programs; such as requests for information**
9 **under the Privacy Act.**
10 Q Okay. So with respect to managing the
11 Freedom of Information Act program, what does your
12 office do?
13 **A So we manage the end-to-end process.**
14 **Requests come in under the Freedom of Information**
15 **Act, and we process them on behalf of the State**
16 **Department.**
17 Q Okay. And during that process, is your
18 office responsible to ensure that the State
19 Department responses completely to FOIA requests
20 and accurately?
21 **A Yes.**
22 Q Okay. Are there specific offices that

21
1 relate to the processing of the FOIA -- of the
2 FOIA program within IPS that are dedicated just
3 for FOIA?
4 **A Yes. So we refer to them as branches.**
5 Q Okay. And what are the branches?
6 **A They are called the FOIA case processing**
7 **branches.**
8 Q And how many branches are there?
9 **A There are four of them.**
10 Q Okay. Can you identify them?
11 **A So two handle complex cases, one handles**
12 **simple expedited and referrals from other**
13 **agencies. And the third handles what we call mega**
14 **cases.**
15 Q I'm sorry, what was the last one?
16 **A Mega cases. So cases where there are**
17 **more than a thousand documents that may be**
18 **responsive.**
19 Q Okay. And have these branches -- or has
20 IPS been organized in this fashion since 2009?
21 **A No. It was organized differently.**
22 Q Okay. And when were these branches

22
1 organized under IPS?
2 **A I'm not sure I understand your question.**
3 Q So the four new offices, have they been
4 new since the -- since 2009?
5 **A They're not new; they are just organized**
6 **differently. Previously they were organized**
7 **geographically, and now they're organized based on**
8 **the type of FOIA request.**
9 Q Okay. And when you say "they were
10 organized geographically," what do you mean by
11 that?
12 **A So one office was responsible -- one**
13 **branch was responsible for a particular geographic**
14 **part of the world, and so on.**
15 Q Okay. And then I believe you identified
16 one of the second roles that IPS does is to -- is
17 regarding records management?
18 **A Yes.**
19 Q Can you please explain that a little bit?
20 **A So it is -- that division is responsible**
21 **for working with the other offices in the State**
22 **Department with regards to records disposition**

23
1 **schedules, having documents retired or destroyed**
2 **as appropriate.**
3 Q When you say records disposition --
4 schedule, I think you said?
5 **A Uh-huh.**
6 Q What -- what do you mean by that?
7 **A So there's kind of a life cycle of a**
8 **record. You know, it's created, it's used, it's**
9 **stored for a particular length of time depending**
10 **on what type of record it might be. And then it's**
11 **retired. And then at some point it might be**
12 **retired for the life of the republic or it could**
13 **be destroyed, depending on what type of record it**
14 **is.**
15 Q And what do you mean when you say, when
16 the record is "retired"? What does that mean?
17 **A So it's no longer a part of the State**
18 **Department's records that people use on a daily**
19 **basis. It's retired normally to a separate**
20 **location.**
21 Q Okay. And what's the life cycle of
22 records before they are retired or disposed?

24
1 **A So a record is created, and then it's**
2 **used, and then it's either disposed or retired,**
3 **depending on what type of record it is.**
4 Q Okay. And when the records are retired,
5 are they retired for purposes of being able to
6 search under FOIA?
7 **A That's not the sole purpose, but that's**
8 **one of the reasons why they I guess would be**
9 **retired.**
10 Q Okay. Where do they go?
11 MR. GARDNER: Objection. Form.
12 Q Did you understand the question?
13 **A Yes.**
14 Q Okay. Could you answer, please.
15 **A So they are retired to the State**
16 **Department's facility where we retire records.**
17 **And then eventually they're retired to the**
18 **National Records Administration.**
19 Q Okay. And does your department, with
20 respect to retiring records, handle or process the
21 retirement of records from State Department
22 officials prior to their departure?

25
1 A So I'm not sure I understand the
2 question.
3 Q Is your office -- let me rephrase.
4 Is your office, the IPS, have any
5 involvement with respect to retirement of records
6 from Secretaries of States and their senior staff
7 prior to departing the State Department?
8 MR. GARDNER: Objection. Form.
9 A So I think it would depend on how long
10 somebody was there. So ...
11 Q Can you explain that?
12 A So --
13 Q Why would that matter?
14 A So what we -- there are different record
15 schedules for different types of records.
16 So we might need to retain them on
17 premises for seven years, so they would stay in
18 sort of the active files for seven years before we
19 would retire them. It doesn't -- I don't think it
20 really matters when a particular person leaves.
21 But I'm not sure.
22 Q Okay. I think we'll get back to that

26
1 actually, a little bit later.
2 Did you receive any training in FOIA?
3 A Yes.
4 Q Okay. And, actually, let me back up.
5 When did you start working for the State
6 Department?
7 A In 1987.
8 Q Okay. Not going to go as far back as
9 1987. But if we could go back to January of 2009,
10 what was your position with the State Department?
11 A In January of 2009 I was the senior
12 management analyst in the Office of the Executive
13 Director, in the Bureau of Intelligence and
14 Research.
15 Q And what did you do in that position?
16 A I performed a variety of functions;
17 responding to data calls relating to human
18 resources, information technology, budget and
19 strategic planning.
20 Q And I'm sorry, what office did you say
21 you were in?
22 A The Office of the Executive Director.

27
1 Q Office of Executive Director. Under what
2 branch were you in?
3 A The Bureau of Intelligence and Research.
4 Q Thank you.
5 Okay. And how long -- well, who did you
6 report to in that position?
7 A I reported to the executive director.
8 Q Who was that?
9 A Leona Coulombe.
10 Q Okay. And how long did you have that
11 position?
12 A I started in that position in January
13 of -- I believe it was January of 2005.
14 Q Okay. And how long did you stay in that
15 position?
16 A I left in October of 2009.
17 Q Okay. And then where did you go?
18 A I became the director of the Office of
19 Intelligence, Operations, and Oversight -- excuse
20 me, also in the Bureau of Intelligence and
21 Research.
22 Q Okay. And how long did you have that

28
1 position?
2 A I still have that position.
3 Q Okay. So you have -- how many positions
4 do you currently hold with the State Department?
5 A So that's my permanent assignment. I'm
6 on a rotational assignment to the office -- where
7 I am now, IPS.
8 Q When did you -- when were you first
9 assigned to your position in IPS?
10 A In February of this year.
11 Q And how is it that you were assigned to
12 IPS in February of 2019?
13 A It's part of a professional development
14 program that I'm in. We are -- have to do a -- a
15 rotational assignment outside of our home office.
16 Q Okay. Have you ever worked in IPS, other
17 than these last few months, since February of this
18 year?
19 A No.
20 Q Okay. I believe I asked you, do you --
21 have you been trained in FOIA?
22 A Yes.

29

1 Q Okay. And when did you first receive
 2 training in FOIA?
 3 **A As part of our records management**
 4 **training that all State Department employees are**
 5 **required to take on an annual basis.**
 6 Q And who provided that training?
 7 **A I believe it's done through the -- the**
 8 **Foreign Service Institute.**
 9 Q And did you receive that training
 10 annually?
 11 **A Yes.**
 12 Q Okay. And how long is the training that
 13 you received?
 14 **A It is about a 90-minute online.**
 15 Q So when you say "90-minute online," is it
 16 an online class or --
 17 **A Yes.**
 18 Q Okay. And is -- was this mandatory?
 19 **A Yes.**
 20 Q Okay. And did you receive this training
 21 last year, in 2018?
 22 **A Yes.**

30

1 Q Okay. And have you done it for this
 2 year, 2019?
 3 **A Yes, I've done it for 2019.**
 4 Q Okay. And then did you do this training
 5 in 2009 through 2014?
 6 **A I don't think it existed back then.**
 7 Q Okay. When did this training begin?
 8 **A I think it started about two years ago.**
 9 Q Okay. So around 2017?
 10 **A Yes.**
 11 Q What about from 2009 to 2014; did you
 12 receive any FOIA training?
 13 **A Not that I recall.**
 14 Q Did you receive any training with respect
 15 to records management from 2009 to 2014?
 16 **A I believe I did.**
 17 Q And who provided that training?
 18 **A The Foreign Service Institute.**
 19 Q And how is that training provided?
 20 **A It's an online course.**
 21 Q Okay. And, also, was that class -- or
 22 course mandatory?

31

1 **A At the time it was not mandatory.**
 2 Q And how long was the online course?
 3 **A It was probably about 90 minutes.**
 4 Q Okay. And how would you know about the
 5 course?
 6 **A It's in our Foreign Service Institute**
 7 **catalogue of courses, also our Executive**
 8 **Director's Office sends out reminders about**
 9 **available training that employees can take.**
 10 Q When you say, executive director's
 11 reminders -- and I'm specifically talking about
 12 2009 to 2014 -- who are the executive directors
 13 you are referring to?
 14 **A So in my -- each bureau has their own**
 15 **executive director. So in my case that would have**
 16 **been Leona Coulombe.**
 17 Q Okay. From 2009 to 2014, what training
 18 does your department, IPS, provide to the state --
 19 to state officials regarding FOIA obligations?
 20 MR. GARDNER: And, Ramona, just really
 21 quickly, which topic does this relate to?
 22 MS. COTCA: Well, I mean, it would go to

32

1 the first prong of Judge Lamberth's order --
 2 MR. GARDNER: I -- I'm asking you what
 3 topic it goes to.
 4 MS. COTCA: Right.
 5 MR. GARDNER: And remember, the first
 6 prong is not subject to the 30(b)(6).
 7 MS. COTCA: I understand. Well, it could
 8 go to the first topic, FOIA request at issue, and
 9 the processing, to trying to understand what
 10 training was received by State Department
 11 officials when they process this FOIA request.
 12 MR. GARDNER: I think it's -- I'm sorry,
 13 I didn't mean to cut you off.
 14 MS. COTCA: And then the third topic, the
 15 initial discovery and reaction of Hillary
 16 Clinton's private e-mail use.
 17 MR. GARDNER: I -- I object. These --
 18 these questions are beyond the scope.
 19 MS. COTCA: Okay. Are you instructing
 20 her not to answer to this question?
 21 MR. GARDNER: No. No. But, I mean, she
 22 is answering in her personal knowledge, not on

33

1 behalf of the State Department. Because it's
2 beyond the scope of the topics.
3 BY MS. COTCA:
4 Q In 2014, when the State Department
5 processed plaintiff's FOIA request, what training
6 did IPS provide to State Department officials
7 regarding FOIA obligations?
8 MR. GARDNER: Same objection. Beyond the
9 scope.
10 A I don't know specifically.
11 Q Okay. With respect to the -- with
12 respect to your office, the director of the office
13 of IPS, actually, who was the director of IPS from
14 2011 -- or 2009 to 2013?
15 A I would have to check.
16 Q Do you have anything here with you today
17 that would help you answer the question?
18 A I'm not sure.
19 Q Okay. We can come back to that.
20 How about from 2014 -- well, in 2014 and
21 2015, who was the director of IPS?
22 A I'm not sure. I'd have to look that up

34

1 as well.
2 Q And who was the deputy director of IPS
3 from 2009 to 2013?
4 A I believe it was John Hackett.
5 Q And then in 2014, who was the deputy
6 director of IPS?
7 A I'm not sure.
8 Q Okay. Specific to IPS, which office --
9 and again this is for two thousand and -- 2013,
10 when Secretary Clinton left the State Department.
11 Which office within IPS was responsible to manage
12 and store records of retiring officials and former
13 Secretaries of State for purposes of searching
14 them under FOIA?
15 A It would have been a joint effort between
16 the Records Division and the Office of the
17 Secretary's Executive Secretariat.
18 Q Okay. And what's the Records Division?
19 A It's one of the divisions in the office
20 of IPS.
21 Q Do you know the name of the division?
22 A I believe it's just the Records Division.

35

1 Q Okay. And who -- who was in charge of
2 the Records Division in January of 2013?
3 A I'm not sure. I'd have to check.
4 Q Okay. Then I believe you said that it
5 was a joint effort with the Office of the
6 Secretary's Executive Secretariat.
7 Who in the Secretary's Executive
8 Secretariat was involved in that joint effort?
9 A I can --
10 Q Again, January of 2013.
11 A I don't know specifically, but it would
12 have been the Correspondence and Records Division.
13 Q And do you know who was in charge of the
14 Correspondence Division back in January of 2013?
15 A Clarence Finney, I believe, was the
16 deputy. I'm not sure who was the director.
17 Q Did you speak with -- did you meet with
18 Mr. Finney to prepare for your deposition here
19 today?
20 A No.
21 Q You did not?
22 A No.

36

1 Q Okay. Did you meet with anybody in his
2 office in your preparation for your deposition
3 here today?
4 A I had a telephone conversation with one
5 of his staff members.
6 Q And who was that?
7 A Jonathon Wasser.
8 Q And when was that phone conversation?
9 A Let's see. That might have been last
10 Friday.
11 Q Okay. Is that the only time you spoke
12 with Mr. Wasser in regards to your testimony here
13 today?
14 A Yes.
15 Q Okay. And how long did the conversation
16 last?
17 A It was probably about ten minutes.
18 Q Did you review the deposition transcript
19 of Mr. Finney in this case?
20 A Yes.
21 Q And when did you review that?
22 A Within the last two weeks.

37

1 Q Is there a reason that you didn't meet
2 with Mr. Finney for your preparation here -- or
3 your preparation of the deposition here today?
4 A **No.**
5 Q Did you request to meet with Mr. Finney?
6 A **No.**
7 Q Did Mr. Finney ask you whether you wanted
8 to meet with him in preparing for your deposition
9 today?
10 A **No.**
11 Q Other than Mr. Wasser, is there anybody
12 else who you spoke with for your preparation here
13 today from the Executive Secretariat's office?
14 A **No.**
15 Q Can we actually -- do you have a list of
16 individuals outside of your DOJ attorneys who you
17 met with or spoke with to prepare for your
18 deposition today?
19 A **No.**
20 Q Okay. When did you begin preparing for
21 your deposition?
22 A **Probably about three or four weeks ago.**

38

1 Q Okay. And other than Mr. Wasser, who
2 else from the State Department did you meet or
3 speak with to prepare for your deposition?
4 MR. GARDNER: Other than counsel, you
5 mean. Right?
6 Q Other than Mr. -- yes. That's -- other
7 than your DOJ attorneys, yes.
8 MR. GARDNER: And state attorneys.
9 Right?
10 MS. COTCA: In the case, yes.
11 MR. GARDNER: Yes.
12 MS. COTCA: But there are fact witness
13 state attorneys who I want to --
14 MR. GARDNER: I understand.
15 MS. COTCA: -- make a distinction there.
16 MR. GARDNER: I understand.
17 Q So other than your attorneys who are here
18 today, and if there are other attorneys that you
19 met with just let us know, if you need to consult
20 with your attorney for privilege information. But
21 other than anybody here today, who else did you
22 meet with to prepare for your deposition?

39

1 A **There was one other attorney.**
2 Q Okay. And what was his name?
3 A **Jamie Bair.**
4 Q And when did you meet with Jamie Bair?
5 A **I think it was last Friday.**
6 Q And was that in person or by phone?
7 A **In person.**
8 Q Okay. And how long did you meet with
9 Mr. Bair?
10 A **Probably about 30 minutes.**
11 Q Okay. And what are the topics that you
12 discussed with Mr. Bair?
13 A **The processing of the FOIA request.**
14 Q When you say "the processing of the FOIA
15 request," are you -- do you mean the processing of
16 the FOIA request at issue in this case?
17 A **Yes.**
18 Q Okay. Did you discuss with Mr. Bair the
19 processing of any other FOIA requests by the State
20 Department?
21 A **We might have touched on the processing**
22 **of the CREW request.**

40

1 Q What did Mr. Bair tell you about the
2 processing of the CREW request?
3 A **I don't recall anything specific.**
4 Q Do you recall what you discussed with
5 respect to the CREW FOIA request with Mr. Bair?
6 A **No.**
7 Q And then any other topics or issues that
8 you discussed with Mr. Bair?
9 A **No.**
10 Q Did you discuss with Mr. Bair the e-mail
11 use of Secretary Clinton while she was at the
12 State Department?
13 A **We did touch on what he knew about that.**
14 Q Okay. And what did he say he knew about
15 that?
16 A **That he didn't know very much about it.**
17 **He didn't really recall the specifics of the FOIA**
18 **request. He, in looking back, is not really aware**
19 **of when he became aware that she might have used**
20 **personal e-mail. At some point he learned that**
21 **documents were going to be returned to the State**
22 **Department.**

Conducted on June 19, 2019

41

1 Q Okay. I want to break this up within
2 time frames.
3 Your discussion with Mr. Bair about
4 Secretary Clinton's e-mail use, did he provide as
5 to the time frame of what his knowledge was about
6 her e-mail use?
7 **A Let's see. I think I'd like to look at**
8 **one of my timelines here.**
9 Q You're looking -- can you just tell me
10 which one you're looking as part of Exhibit 1?
11 **A It's called Excerpts Concerning Knowledge**
12 **of E-mail Use.**
13 MR. GARDNER: It's Exhibit 2.
14 MS. COTCA: Actually, it's Exhibit 2.
15 Mine is the one that's marked.
16 Should we swap?
17 MR. GARDNER: Yeah, we can do that. So
18 why don't we do this.
19 These are not written on. Right?
20 THE WITNESS: Correct.
21 MR. GARDNER: So why don't we just give
22 this to you, and we'll -- and then if you need,

42

1 there are binder clips over there. So ...
2 MS. COTCA: Thank you.
3 MR. GARDNER: Sure.
4 Can I make a suggestion just for having a
5 cleaner transcript. Do you want to mark each of
6 them separately with different exhibit numbers?
7 It might make for a cleaner transcript.
8 MS. COTCA: Sure.
9 (A discussion was held off the record.)
10 (Pitterle Deposition Exhibit 3 through
11 Exhibit 7 marked for identification, retained by
12 counsel.)
13 **A Okay. Do you want to repeat the**
14 **question?**
15 Q Yeah. I think my question was, with
16 respect to your discussions with Mr. Bair about
17 his knowledge -- or discussions about Secretary
18 Clinton's e-mail use, what did he tell you as to
19 what his knowledge was in -- within specific time
20 frames from 2009 to 2014?
21 **A So if I recall correctly, he did not**
22 **remember anything specific. But he looked at Gene**

43

1 **Smilansky's deposition, and said that that seemed**
2 **about right.**
3 **So they became aware of a small number of**
4 **e-mails sent or received by Clinton when they were**
5 **working on a congressional document request. But**
6 **they really didn't think too much about it. They**
7 **were more concerned with the content of the**
8 **e-mails.**
9 Q Okay. I -- I just -- you're looking at a
10 document. And just for the record, I just want to
11 know what document you're looking at while you're
12 answering this question.
13 **A It's Exhibit 3.**
14 Q Okay. And I apologize for interrupting
15 you. But, go ahead.
16 **A That was about it.**
17 Q Okay. And what portion of this document
18 did you review as part of your answer?
19 **A What would have been the bottom of Page 3**
20 **and the top of Page 4.**
21 Q Did Mr. Bair say which portions of the
22 transcript he read from Gene Smilansky's

44

1 deposition?
2 **A No.**
3 Q Okay. Did he state whether he reviewed
4 the entirety of Gene Smilansky's deposition
5 transcript in this case?
6 **A No.**
7 Q Okay. And for the record, you said
8 Mr. Bair is an attorney in the legal advisor's
9 office --
10 **A Yes.**
11 Q -- in the State Department?
12 How long has he been an attorney in that
13 office?
14 **A I don't know.**
15 Q Was he an attorney in that office in
16 2013?
17 **A I think he started in 2014.**
18 Q Okay. And how do you know that?
19 **A I think it came up when he -- when he and**
20 **I were speaking.**
21 Q Did you and Mr. Bair discuss any
22 conversations that he had with Mr. Hackett in

Conducted on June 19, 2019

45

1 regards to Secretary Clinton's e-mail use in 2014?
2 A No.
 3 Q Did you have any discussions with
 4 Mr. Bair with respect to any discussions Mr. Bair
 5 may have had with Clarence Finney about Secretary
 6 Clinton's e-mail use in 2014?
7 A No.
 8 Q Did you have any conversations with
 9 Mr. Bair with respect to any requests that he may
 10 have made of Mr. Hackett or Mr. Finney to provide
 11 a briefing to the public affairs in regards to
 12 Secretary Clinton's e-mail account in or around
 13 summer, early fall 2014?
14 A No.
 15 Q Did you review the deposition transcript
 16 of John Hackett in this case?
17 A Yes.
 18 Q Did you raise any questions with Mr. Bair
 19 with respect to the conversations Mr. Hackett
 20 testified about that he had with Mr. Bair around
 21 these -- about these subject matters in 2014?
 22 MR. GARDNER: Objection. Form.

46

1 A No.
 2 Q Why not?
3 A It just didn't occur to me.
 4 Q Did you confirm with Mr. Bair whether
 5 Mr. Hackett's representations about the
 6 conversations he had with Mr. Bair in 2014
 7 relating to these topics were accurate?
8 A No.
 9 Q All right. And other than Mr. Bair and
 10 Jonathon Wasser, who else from the State
 11 Department did you meet with or speak to to
 12 prepare for your deposition here today?
13 A I think that was it.
 14 Q And I would ask the same question, but
 15 with respect to any former State Department
 16 officials. Did you speak or meet with any State
 17 Department -- former State Department officials to
 18 prepare for your deposition?
19 A No.
 20 Q Okay. And what did you review? I
 21 understand you reviewed the deposition transcript
 22 of John Hackett for your prep -- for your

47

1 deposition today?
2 A Yes.
 3 Q Did you review any other deposition
 4 transcripts?
5 A Yes.
 6 Q Which ones?
7 A Karen Lang had given a deposition. I
8 think Gene Smilansky's deposition. Whatever's in
9 the notebooks are the materials I took a look at.
 10 Q Did you review all of the documents that
 11 are in the --
 12 MR. GARDNER: Six.
 13 Q -- six binders --
 14 MS. COTCA: Thank you.
 15 Q -- that your attorneys brought here
 16 today?
17 A Yes.
 18 Q And when did you review the materials in
 19 these binders?
20 A Over the last three weeks or so.
 21 Q Did you review any documents that are not
 22 contained in those six binders that your attorneys

48

1 brought here today?
2 A I don't believe so.
 3 Q Did you -- I understand you did not speak
 4 with Mr. Hackett to prepare for your deposition.
 5 Did you request of your attorneys to
 6 be -- to have an opportunity to speak with
 7 Mr. Hackett for your deposition today?
8 A No.
 9 Q Okay. How about with respect to
 10 Ms. Walter, Sheryl Walter?
11 A No.
 12 Q How about Mr. Stein? Is -- he's your
 13 boss --
14 A Yes.
 15 Q -- Eric Stein?
 16 And again, he's the director of IPS.
 17 Correct?
18 A Yes, that's correct.
 19 Q And how long has he been the director of
 20 IPS?
21 A I believe he's been the director for the
22 last 18 months.

Conducted on June 19, 2019

<p style="text-align: right;">49</p> <p>1 Q So I'm sorry, I'm bad with math. When 2 would that be? 3 A I'm also bad with math. So it's 2019. 4 2018. Like midway through 2017, I guess. Would 5 that be 18 months? 6 Q We're in June. 7 MR. GARDNER: I think -- I think my math 8 is right. I think it's the end of the year. 9 Right? 10 A How about why don't I check during a 11 break. 12 Q I'm sorry? 13 A Why don't I check during a break. 14 Q Okay. That would be great, if you can. 15 And then prior to being the director of 16 IPS, what -- what position did Mr. Eric Stein 17 hold? 18 A He was the deputy. 19 Q And when did he become the deputy of IPS? 20 A I don't know. 21 Q Can you check on that as well? 22 A Sure.</p>	<p style="text-align: right;">51</p> <p>1 Q Okay. What was Mr. Stein's knowledge 2 about Secretary Clinton's e-mail account in the 3 summer of 2014? 4 A He didn't have any -- I don't think he 5 had any real understanding in 20 -- in summer of 6 2014. 7 Q Did you speak -- 8 A They were just -- 9 Q I'm sorry. Go ahead. I'm sorry. 10 A Officials at different parts of the State 11 Department had a different -- had differing 12 understandings and kind of an evolving 13 understanding of Secretary Clinton's e-mail usage. 14 Q Did you ask or request from Mr. Stein to 15 know what his understanding was with respect to 16 Secretary Clinton's e-mail use -- 17 A No. 18 Q -- in 2014? 19 A No, I didn't ask him about it. 20 Q Okay. And what -- what role did 21 Mr. Stein play with respect to the return of 22 Secretary Clinton's e-mails in 2014?</p>
<p style="text-align: right;">50</p> <p>1 Q Okay. Did you speak with Mr. Stein in 2 preparing for your deposition here today? 3 A No. 4 Q Why not? 5 A I didn't have any specific questions for 6 him. 7 Q What was Mr. Stein's involvement with 8 respect to Secretary -- the collection of 9 Secretary Clinton's e-mail -- e-mails in 2014? 10 A I'm not sure I understand. I mean, 11 that's a pretty broad question. 12 Q Was he -- I'm sorry, I don't mean to cut 13 you off. Let me clarify. 14 Was he -- did he have a role or was he at 15 all involved with respect to the State Department 16 making a request to Secretary Clinton or her 17 representatives for Secretary Clinton's e-mails in 18 2014? 19 MR. GARDNER: Objection. Form. 20 A Not that I'm aware -- 21 Q I'm sorry? 22 A Not that I'm aware of.</p>	<p style="text-align: right;">52</p> <p>1 A I don't think he had -- played any role. 2 Q Was he aware that Secretary Clinton was 3 returning e-mails in December of 2014? 4 A I think at that point he knew that they 5 were waiting for some documents to be returned. 6 Q At which point? You said "at that 7 point" -- 8 A I think you just said -- 9 Q -- so I'm just asking at which point. 10 A I think you said December of '14. 11 Q Okay. So you're -- you're testifying 12 that in December of 2014 Mr. Stein knew that 13 Secretary Clinton was returning e-mails. 14 Is that a fair understanding? 15 A Yes. 16 Q Okay. Prior to December 2014, do you 17 know what knowledge Mr. Stein had with respect to 18 Secretary Clinton's return of e-mails to the State 19 Department? 20 A No. 21 Q How about Tasha Thian; do you know who 22 Tasha Thian is?</p>

Conducted on June 19, 2019

53

1 **A She was in the Records Division around**
 2 **that time frame, 20 --**
 3 Q What time frame?
 4 **A Late December of 2014.**
 5 Q Now, what was her role in the Records
 6 Division?
 7 **A I believe she was the division chief.**
 8 Q And is there a reason that you didn't
 9 speak with Tasha Thian to prepare for your
 10 deposition today?
 11 **A No.**
 12 Q How about Patrick Scholl; who is Patrick
 13 Scholl?
 14 **A He's an employee at IPS.**
 15 Q Is there a reason that you didn't speak
 16 with Mr. Scholl for your preparation here today?
 17 **A No.**
 18 Q Okay. And what is his position within
 19 IPS?
 20 **A He is currently on detail as the head of**
 21 **the search team.**
 22 Q What's -- can you elaborate on that?

54

1 What's the head of the search team?
 2 **A Sure. So it's a -- a team that is -- the**
 3 **responsibility -- they have the responsibility for**
 4 **searching through some of the electronic databases**
 5 **in response to FOIA requests.**
 6 Q Okay. And is that in a different office?
 7 **A It's part of IPS.**
 8 Q Okay. And what is his permanent position
 9 within IPS?
 10 **A He's the division chief for the FOIA**
 11 **branch.**
 12 Q And what was his position within IPS in
 13 2013?
 14 **A I don't know.**
 15 Q What role did Mr. Scholl play in
 16 processing the CREW FOIA request in 2012 and 2013?
 17 **A I don't know.**
 18 Q Going back to Tasha Thian. Is she still
 19 an employee of the State Department?
 20 **A I don't know.**
 21 Q Do you know how long she was the division
 22 chief within the records -- I think you said the

55

1 Records Division of IPS?
 2 **A No, I don't.**
 3 Q Do you know what her position was in
 4 2013?
 5 **A I believe she was in the Records**
 6 **Division, but I'm not sure what her exact title**
 7 **was.**
 8 Q How about Gene Smilansky?
 9 **A He's an attorney in the Office of the**
 10 **Legal Advisor.**
 11 Q Okay. Is there a reason you didn't speak
 12 with Mr. Smilansky in regards to your deposition?
 13 **A No.**
 14 Q Do you know what his role was in
 15 processing the CREW FOIA request?
 16 **A I believe he was one of the attorneys in**
 17 **the Office of the Legal Advisor that IPS consulted**
 18 **with once it moved to litigation.**
 19 Q Did you -- did you speak with
 20 Mr. Smilansky or request to speak with
 21 Mr. Smilansky with respect to what his
 22 understanding was of Secretary Clinton's e-mail

56

1 use during the processing of the CREW FOIA
 2 request?
 3 **A No.**
 4 Q Do you know who Charles Wisecarver is?
 5 **A I recognize the name, but I'm not sure**
 6 **what his position is.**
 7 Q Do you recognize the name as part of your
 8 review in this case or ...
 9 **A I don't recall coming across that in my**
 10 **review.**
 11 Q Okay. And you did not speak with
 12 Mr. Wisecarver for your preparation today?
 13 **A No.**
 14 Q And how about Tom Lawrence; do you know
 15 who Tom Lawrence is?
 16 **A I recognize the name, and I associate it**
 17 **with IT.**
 18 Q And did you review any documents with
 19 respect to Mr. Lawrence in preparing for your
 20 deposition here today?
 21 **A No.**
 22 Q And how about Kevin Wagner, spelled

Conducted on June 19, 2019

<p style="text-align: right;">57</p> <p>1 W-A-G-N-E-R; or Waggener, a variation of the 2 spelling I believe is W-A-G-G-E-N-E-R? 3 A No. 4 Q You don't know who that is? 5 A No. 6 Q Did you review any documents with respect 7 to Charles Wisecarver for your preparation for the 8 deposition today? 9 A No. 10 MS. COTCA: Can we go off the record. 11 VIDEO SPECIALIST: We are going off the 12 record at 11:04. 13 (A recess was taken.) 14 VIDEO SPECIALIST: We are back on the 15 record at 11:25. 16 MR. GARDNER: Thank you. So I think 17 Ms. Pitterle has a few clarifying comments, as 18 well as some answers to some of your outstanding 19 questions that are within the scope. 20 So, if you would, if you want to provide 21 that information. 22 THE WITNESS: Sure. So you asked about</p>	<p style="text-align: right;">59</p> <p>1 BY MS. COTCA: 2 Q Is that it? 3 A Yes. 4 Q Okay. With respect to Eric Stein's roles 5 from 2013 to 2016, what did you review to be -- 6 how do you -- how do you know the information you 7 just provided? 8 A I discussed it with the counsel from the 9 State Department. 10 Q I'm sorry, what? 11 A I discussed it with during the break with 12 the counsel from the State Department. 13 Q Which counsel? 14 A Lizzy Grosso. 15 Q That's the attorney here -- 16 A Yes. 17 Q -- representing you? 18 A Uh-huh. Yes. 19 Q And what did Mr. Stein -- what were his 20 responsibilities and duties as the senior advisor 21 in April 2013? 22 A So he provided management and other</p>
<p style="text-align: right;">58</p> <p>1 different dates that people were in different 2 positions, in particular Eric Stein. 3 So Eric was the senior advisor for the 4 Deputy Assistant Secretary for the Global 5 Information Services in April of 2013. 6 And then in March of 2016, he became the 7 co-director of the Office of Information Programs 8 and Services. And then in October of that year, 9 2016, he became the acting director. And then in 10 January of 2017 he became the director of the 11 office. 12 Also you had asked about Tasha Thian, and 13 she left records management in June of 2014, but 14 had been there for the previous seven years. 15 You also asked about who was the director 16 of the Office of Information Programs and 17 Services. And Sheryl Walter was the director from 18 December of 2011 to March of 2014. 19 You also asked about John Hackett. And 20 John Hackett was the deputy director of IPS from 21 April 2013 to March of 2014. And then he became 22 the acting director of IPS.</p>	<p style="text-align: right;">60</p> <p>1 expertise and guidance to the Deputy Assistant 2 Secretary. 3 Q Okay. And what guidance did he provide 4 to the Deputy Assistant Secretary? 5 MR. GARDNER: Objection. Form. 6 Q Okay. I'll rephrase it. 7 What is the guidance that Mr. Stein 8 provided in April 2013 in his role as a senior 9 advisor? 10 A I'm sure he provided guidance on a daily 11 basis about many different issues. 12 Q What type of issues? 13 A So in addition to the Office of 14 Information Programs and Services, the Global 15 Publishing Office also comes under the Deputy 16 Assistant Secretary. 17 So it would have been management in other 18 issues related to the operations of the Global 19 Publishing Operation, as well as the Office of 20 Information Programs and Services. 21 Q Okay. And with respect to FOIA, what -- 22 what were his duties in 2013 as a senior advisor?</p>

Conducted on June 19, 2019

61

1 **A** He did not have -- as far as I know, he
 2 **did not have any specific duties involving FOIA at**
 3 **that time, other than just the same he would have**
 4 **for any other part of the organization, sort of**
 5 **general management duties and providing advice to**
 6 **the Deputy Assistant Secretary.**
 7 Q I guess I don't understand your answer.
 8 What do you mean, the general management
 9 duties and providing advice to the Deputy
 10 Assistant Secretaries with respect to FOIA.
 11 What do you mean by that?
 12 **A** **So in the same way that he would provide**
 13 **advice if she had a particular -- or needed**
 14 **information or needed help or assistance with the**
 15 **running of the organization, he would provide, you**
 16 **know, guidance and insight.**
 17 Q And what was his role and responsibility
 18 as the co-director of IPS in March of 2016?
 19 **A** **So he would have been in charge of the**
 20 **day to -- as co-director of the day-to-day**
 21 **operations of the management of the office.**
 22 Q And with respect to FOIA, what

62

1 responsibilities did he have in March of 2016 as
 2 the co-director of IPS?
 3 **A** **He was responsible for helping ensure the**
 4 **smooth functioning of the FOIA program at the**
 5 **department.**
 6 Q And who did he report to back in March of
 7 2016?
 8 **A** **He would have reported to the Deputy**
 9 **Assistant Secretary for the Global Information**
 10 **Services organization.**
 11 Q And who was that in March of 2016?
 12 **A** **I don't know.**
 13 Q And who was the co-director of IPS in
 14 March of 2016 along with Mr. Stein?
 15 **A** **I believe it was John Hackett.**
 16 Q Okay. And with respect to Tasha Thian,
 17 how do you know or what did you review to provide
 18 the information that she left in June 2014?
 19 **A** **I spoke with Lizzy Grosso.**
 20 Q Who's that?
 21 **A** **She's an attorney here from the State**
 22 **Department.**

63

1 Q And where did Tasha Thian go after 2014
 2 with respect to employment-wise?
 3 **A** **I don't know. But I believe she left the**
 4 **State Department.**
 5 Q And with respect to Sheryl Walter, how do
 6 you know that she was the director in 2014? What
 7 did you review during the break to know that?
 8 **A** **I reviewed Exhibit 3.**
 9 Q Exhibit 3. Let's see.
 10 And what is Exhibit 3?
 11 **A** **I'm sorry?**
 12 Q What is Exhibit 3?
 13 **A** **It is entitled Excerpts Concerning**
 14 **Knowledge of E-Mail Use.**
 15 Q And what portion of Exhibit 3 did you
 16 review?
 17 **A** **Beginning of the middle of Page 4.**
 18 Q Okay. Where Sheryl Walter appears on a
 19 bullet point?
 20 **A** **Yes.**
 21 Q Okay. I see.
 22 Let me ask you, who prepared Exhibit 2,

64

1 or the documents contained in Exhibit 2 through
 2 Exhibit 7 that you brought with you here today?
 3 **A** **I prepared those, in consultation with**
 4 **counsel from DOJ and the State Department.**
 5 Q Did anybody in your office assist you in
 6 preparing this, these documents?
 7 **A** **No.**
 8 Q Okay. Did you discuss any of these
 9 documents with Mr. Stein?
 10 **A** **No.**
 11 Q And then for John Hackett, after the
 12 break you -- I believe you said that he was the
 13 acting director in 2014? Was that your testimony?
 14 **A** **He was the deputy director between April**
 15 **2013 and March 2014, when he then became the**
 16 **acting director of IPS.**
 17 Q Okay. And how do -- what did you review
 18 to have that answer?
 19 **A** **I reviewed --**
 20 Q -- after the break?
 21 **A** **-- Exhibit 3.**
 22 Q And again, this is Excerpts Concerning

65

1 Knowledge of E-Mail Use. Correct?
 2 **A Yes.**
 3 Q Okay. And what portion of this document
 4 did you review for that information?
 5 **A The latter portion of Page 4.**
 6 Q Oh, the bullet point where Mr. Hackett's
 7 name is listed?
 8 **A Yes.**
 9 Q Okay. How did you decide which
 10 individuals to speak with to prepare for your
 11 deposition today?
 12 **A I, after reviewing the materials and**
 13 **talking to counsel from DOJ and the Department of**
 14 **State, felt like we had a gap that perhaps Jamie**
 15 **Bair could help us with. Because I didn't have a**
 16 **full understanding of what his knowledge might**
 17 **have been. And with Jonathon Wasser I wanted**
 18 **clarification on the record systems and use in**
 19 **S/ES.**
 20 Q Were you instructed not to speak with any
 21 other individuals to prepare for your deposition
 22 here today, other than Mr. Wasser and Mr. Bair?

66

1 **A No.**
 2 Q When does your assignment end?
 3 **A It ends at the end of the month.**
 4 Q So June 30th?
 5 **A Yes.**
 6 Q Were you assigned on this detail for
 7 purposes of being the corporate designee in this
 8 case?
 9 **A No.**
 10 Q Did anybody contact you with respect --
 11 and outside of your attorneys sitting here today,
 12 with respect to your deposition?
 13 **A No.**
 14 Q And I want to go over, you said that with
 15 your conversation with Mr. Bair, you said you had
 16 a 30-minute conversation?
 17 **A Yes.**
 18 Q Okay. And when was that conversation?
 19 **A Last Friday.**
 20 Q June -- that would be June 14. Okay.
 21 Did you have the conversation with
 22 Mr. Bair after or before you read Mr. Hackett's

67

1 deposition?
 2 **A After.**
 3 Q Did you have your conversation with
 4 Mr. Bair after or before you spoke with
 5 Mr. Smilansky?
 6 **A I didn't speak with Mr. Smilansky.**
 7 Q Oh, I'm sorry. You did not speak with
 8 Mr. Smilansky.
 9 Did you review Mr. Smilansky, Gene
 10 Smilansky's deposition transcript in this case?
 11 **A Yes.**
 12 Q Okay. Did you review the entirety of the
 13 deposition transcript?
 14 **A I'm not sure.**
 15 Q Did you speak with Mr. Bair before or
 16 after you reviewed Gene Smilansky's deposition
 17 transcript in this case?
 18 **A After.**
 19 Q And I guess I have the same question for
 20 Mr. Hackett's deposition transcript. Did you
 21 review the entirety of Mr. Hackett's --
 22 **A Yes.**

68

1 Q -- deposition transcript?
 2 **A Yes, I did.**
 3 Q Did you review Sheryl Walter's deposition
 4 transcript in this case?
 5 **A No.**
 6 Q How about Clarence Finney; did you review
 7 Mr. Finney's deposition transcript in this case?
 8 **A Yes.**
 9 Q And did you review the entirety of his
 10 deposition transcript?
 11 **A Yes.**
 12 Q Did you speak with Mr. Bair prior to
 13 or -- or after you reviewed the deposition
 14 transcript of Mr. Finney?
 15 **A After.**
 16 Q And that was the only occasion that you
 17 spoke with Mr. Finney on June -- last Friday.
 18 Correct?
 19 **A I didn't --**
 20 **MR. GARDNER: Objection.**
 21 Mischaracterizes the testimony. She didn't speak
 22 to Mr. Finney.

Conducted on June 19, 2019

69

1 MS. COTCA: I'm so sorry.
 2 MR. GARDNER: That's okay.
 3 MS. COTCA: Thank you.
 4 Q That was on Friday, last Friday, June 14,
 5 was the only time you spoke with Mr. Bair --
 6 A Yes.
 7 Q Okay. Anybody else present during that
 8 conversation?
 9 A Yes.
 10 Q Who?
 11 A **Lizzy Grosso, the attorney from the State**
 12 **Department. And I'm trying to think who else was**
 13 **there. I think one of the lawyers from the**
 14 **Department of Justice. I think it was Stephen.**
 15 Q Mr. Pezzi?
 16 A Yes.
 17 Q Okay. Anybody else?
 18 A **I think that was it.**
 19 Q Okay. Did you take any notes during --
 20 from that conversation?
 21 A No.
 22 Q Okay. And can you tell me what exactly

70

1 Mr. Bair told you on June 14 during the 30-minute
 2 conversation you had with him?
 3 A **So -- and, actually, I think I have a**
 4 **clarification to make. Because we did not show**
 5 **him Mr. Smilansky's deposition. But we sort of**
 6 **talked through and characterized what**
 7 **Mr. Smilansky recalled from -- in the deposition**
 8 **about Hillary Clinton's e-mails.**
 9 Q Okay. And what portions of
 10 Mr. Smilansky's deposition did you discuss with
 11 Mr. Bair last Friday?
 12 A **It was sort of what his -- what he was**
 13 **describing his understanding of what he -- sort of**
 14 **when he thought he became aware that there might**
 15 **have been e-mails that Secretary -- that Secretary**
 16 **Clinton was using some type of e-mails.**
 17 Q And when you say "he," are you referring
 18 to Mr. Smilansky's testimony --
 19 A Yes.
 20 Q -- or are you referring to Mr. Bair's?
 21 A **Mr. Smilansky's.**
 22 Q Okay. So what did you tell Mr. Bair with

71

1 respect to what Mr. Smilansky's understanding was
 2 with respect to Secretary Clinton's e-mails, and
 3 what was the time frame?
 4 A **So there were -- we were talking about**
 5 **Gene Smilansky's sort of duties that summer of**
 6 **June of 2013; that he was reviewing documents for**
 7 **production to a congressional committee having to**
 8 **do with Benghazi; that he came across a couple of**
 9 **e-mails that had been sent by Secretary Clinton;**
 10 **that he didn't really focus on whether or not it**
 11 **had a state.gov e-mail address.**
 12 Q That who didn't focus whether the e-mails
 13 had a state.gov e-mail address?
 14 A **Mr. Smilansky.**
 15 Q Okay. Anything else?
 16 A No.
 17 Q Okay. And this information you got from
 18 reviewing Mr. Smilansky's deposition transcript,
 19 not speaking with Mr. Smilansky directly.
 20 Correct?
 21 A **That's correct. Uh-huh.**
 22 Q And what did Mr. Bair say in response to

72

1 or about what Mr. Smilansky's understanding or
 2 knowledge was about Secretary Clinton's e-mails in
 3 or around June 2013?
 4 A **That his knowledge about the e-mails was**
 5 **about the same; that he, in reviewing documents**
 6 **for a congressional request a little bit later in**
 7 **time, thought he recalled coming across a couple**
 8 **of e-mails that were from Hillary Clinton or to**
 9 **Hillary Clinton. And so he had some understanding**
 10 **that there were a smattering of e-mails that she**
 11 **either sent or received.**
 12 Q And what was the time frame for
 13 Mr. Bair's understanding of this?
 14 A **So he started in April of 2014. So it**
 15 **was, like, summer-ish of 2014.**
 16 Q And -- and can you elaborate on what --
 17 what did he start in April of 2014?
 18 A **I think he started in the Office of the**
 19 **Legal Advisor in 2014.**
 20 Q And what did he say with respect to
 21 Secretary Clinton's e-mails that he came across in
 22 2014, starting in April?

73

1 **A Are you asking about Jamie Bair?**
2 Q Jamie Bair. Yes, Jamie Bair.
3 MR. GARDNER: Objection. Form. He
4 started in April. Reask the question.
5 MS. COTCA: Let me -- let me, actually,
6 ask a different question.
7 Q He started in April of 2014. I
8 understand that. But when was his understanding,
9 or when did he come across the Secretary Clinton's
10 e-mails?
11 **A I believe it was summer of 2014.**
12 Q Did he provide any more specific time
13 frame?
14 **A No.**
15 Q Did he provide as to what congressional
16 investigation he was responding to when he came
17 across -- or assisting with when he came across
18 Secretary Clinton's e-mails relating to Benghazi?
19 **A He didn't talk about the specific**
20 **committee, but I believe it was Benghazi related.**
21 Q How do you know it was Benghazi related?
22 **A He said it was Benghazi related.**

74

1 Q Okay. Did Mr. Bair specify whether he
2 was working on a response to just one committee or
3 more than one committee in regards to Benghazi in
4 the summer of 2014?
5 **A He didn't say.**
6 Q And what did -- did you have any
7 discussions with Mr. Bair with respect to what he
8 did with the information once he learned of
9 Secretary Clinton's e-mail address used after he
10 came across the -- her Benghazi-related e-mails in
11 the summer of 2014?
12 **A I don't think he did anything with them.**
13 Q Did you ask him? Did you have that
14 conversation with him?
15 **A I believe we did talk about it.**
16 Q Okay. And what did he say?
17 **A That he didn't really focus on -- he just**
18 **focused more on the content, and not focused on**
19 **the addresses.**
20 Q Did you have any conversation with
21 Mr. Bair with respect to any discussion he had
22 with Mr. Hackett to give Mr. Hackett a heads up

75

1 that the State Department was going to produce
2 records to the Hill in the summer of 2014 that
3 would generate some publicity for the State
4 Department?
5 **A No.**
6 MR. GARDNER: Objection. Asked and
7 answered.
8 Q What was your answer?
9 **A No. No.**
10 Q Okay. Do you recall Mr. Hackett's
11 testimony about that conversation?
12 **A No.**
13 Q When did you review Mr. Hackett's
14 deposition transcript in this case?
15 **A It was about two weeks ago.**
16 Q Did Mr. Bair notice the e-mail address
17 `hdr22@clintonemail.com` for Secretary Clinton in
18 summer of 2014?
19 **A We didn't talk about the specific e-mail**
20 **address.**
21 Q Did you have any discussions with
22 Mr. Bair as to what he did once he discovered

76

1 Secretary Clinton's e-mail address that she used
2 while she was at the State Department?
3 **A He -- I think we already went over this.**
4 **But he said --**
5 Q I apologize.
6 **A -- that he didn't really focus on what**
7 **the e-mail address said; he was focused on the**
8 **content.**
9 **He just sort of in the back of his head**
10 **note -- kind of noted, Oh, it either came from or**
11 **went to Hillary Clinton. And he didn't really**
12 **focus on the specific e-mail address.**
13 Q Did Mr. Bair, or did you have any
14 discussions with him with respect to what
15 conversations he had with Mr. Finney or Mr. Wasser
16 in August of 2014 about Secretary Clinton's e-mail
17 account?
18 **A No.**
19 Q Do you know if Mr. Bair reviewed any
20 documents in preparation of his discussion with
21 you?
22 **A I don't know.**

77

1 Q Did you ask him?
2 A No.
3 Q Okay. Anything else that you discussed
4 with Mr. Bair?
5 A No.
6 Q Did you discuss with Mr. Bair the
7 processing of this FOIA request?
8 A No.
9 Q Was Mr. Bair the attorney assigned for
10 handling this FOIA request in 2014?
11 A I'm not sure.
12 Q I want to go through Exhibit 1 and just
13 go topic by topic. Do you have a copy of it?
14 Okay.
15 With respect to Topic Number 1, the FOIA
16 request at issue in this case, what do you know
17 about this?
18 MR. GARDNER: Objection. Form.
19 Can you ask maybe a bit of a more
20 tailored question? That's very overbroad.
21 Q Okay. What do you know about the FOIA
22 request at issue in this case, the processing of

78

1 the FOIA issue in this case, from May 2014 through
2 February of 2015?
3 A Well, I know it was received by the
4 department and acknowledged, and then the IPS
5 staff sent out search taskers to the Office of the
6 Secretary, looking for records. Various searches
7 were conducted. Some records were found that
8 potentially would have been responsive, and they
9 were reviewed and released.
10 Q And how do you know this?
11 A In reviewing the documents in the six
12 binders.
13 Q Okay. And which documents did you review
14 specific to Topic Number 1?
15 A Right. So I looked at the Hackett
16 declaration, there are various e-mails and memos
17 describing the searches that were done, e-mail
18 correspondence between IPS staff and the Office of
19 the Secretary.
20 Q And e-mail correspondence between IPS
21 staff and Office of the Secretary, who were the
22 correspondences with in the Office of the

79

1 Secretary that you reviewed?
2 A So there are some e-mails going back and
3 forth I believe, and some memos from Clarence
4 Finney.
5 Q Do you know what --
6 A And Jonathon Wasser.
7 Q I'm sorry.
8 Do you know what office Mr. Finney and
9 Mr. Wasser are in?
10 A Yes. They're in the office of the
11 Executive Secretariat.
12 Q Okay.
13 A The Correspondence and Records Division.
14 Q And how many e-mail correspondences did
15 you review?
16 A I don't know the specific number.
17 Q Did you review --
18 MR. GARDNER: It wasn't apparent to me
19 that she was done with the first question that was
20 pending about everything that she reviewed to
21 answer the question.
22 So I don't know if you were done or you

80

1 weren't. But if you weren't done ...
2 A Sure. So there were other depositions
3 that I looked at, including Jonathon Wasser's
4 deposition.
5 Q And what other depositions did you
6 review?
7 A I don't --
8 Q For purposes of Topic Number 1?
9 A I don't recall off the top of my head.
10 Q Did you create a list of what documents
11 you reviewed for which topics identified
12 in point -- in Exhibit 1?
13 A So they're marked in the -- in Exhibit 2,
14 the summary of searches performed.
15 Q What is marked in Exhibit 2? I'm sorry.
16 A The -- the documents that I reviewed.
17 Q Okay.
18 MR. GARDNER: And if it's easier for you,
19 Ramona, the last page, there's a table of
20 contents.
21 Q These are the documents you reviewed for
22 Topic Number 1. Is that your testimony?

Conducted on June 19, 2019

81

1 **A Yes.**
 2 Q Okay. Let me ask you, with respect to
 3 the documents and the e-mails referenced in the
 4 table of contents of Exhibit 2, did you review
 5 them in redacted form or unredacted form?
 6 **A Redacted form.**
 7 Q Did you request to review them in
 8 unredacted form?
 9 **A No.**
 10 Q Is there a reason you didn't ask to see
 11 them in unredacted form?
 12 **A No.**
 13 Q Okay. Why did you not speak with
 14 individuals involved in Judicial Watch's FOIA
 15 request as identified in Exhibit 2?
 16 MR. GARDNER: Objection. Form.
 17 **A I didn't have any specific questions for**
 18 **them.**
 19 Q Okay.
 20 MS. COTCA: Can we go off the record?
 21 MR. GARDNER: Sure.
 22 VIDEO SPECIALIST: We are going off the

82

1 record at 11:54.
 2 (A recess was taken.)
 3 VIDEO SPECIALIST: We are back on the
 4 record at 12:02.
 5 MR. GARDNER: And I think Ms. Pitterle
 6 had a few things that she wished to clarify.
 7 THE WITNESS: So you asked who I had
 8 spoken to about the FOIA search. So I did speak
 9 to Jamie Bair and Jonathon Wasser about the
 10 processing of the FOIA request.
 11 Q And what refreshed your recollection with
 12 respect to your conversation with Mr. Bair in the
 13 last five minutes last Friday about -- that you
 14 had with him about the processing of this FOIA
 15 request?
 16 **A I reviewed the summary again and spoke to**
 17 **counsel.**
 18 Q Okay. What -- what's the summary that
 19 you reviewed to refresh your recollection in that
 20 regard?
 21 **A Exhibit 2, Summary of Searches Performed**
 22 **For Documents Responsive to the Talking Points**

83

1 **FOIA Request.**
 2 Q Where is that? Where are you looking to
 3 on Exhibit 2, if you don't mind?
 4 **A I just scanned through and took another**
 5 **look at it.**
 6 Q So what part of this document refreshed
 7 your recollection with respect to your
 8 conversation with Mr. Bair from last Friday about
 9 the processing of this FOIA request?
 10 **A I can't point to anything specific.**
 11 Q And when you said you spoke with counsel
 12 which also helped refresh your recollection, is
 13 that your attorneys here today?
 14 **A Yes.**
 15 Q Okay. And what do you now recall about
 16 your conversation with Mr. Bair that you had last
 17 Friday about the processing of this FOIA request?
 18 **A So I -- we talked a little bit about what**
 19 **his involvement had been. And while he didn't --**
 20 **I don't think he recalled specifically too much**
 21 **about the specific FOIA request, but he talked a**
 22 **little bit about his general work with IPS in**

84

1 **processing FOIA cases that had gone to litigation.**
 2 Q Okay. And what did he say specific to
 3 those FOIA requests with respect to his role or
 4 involvement?
 5 **A That he would have provided guidance on**
 6 **some of the searches potentially, as well as other**
 7 **processing of the FOIA request.**
 8 Q Did he have any specific recollection
 9 with respect to what guidance he provided relating
 10 to some of the searches that were done in this
 11 case?
 12 **A No.**
 13 Q And what did he say with respect to other
 14 processing of the FOIA request that he recalls
 15 specific to this request?
 16 MR. GARDNER: Objection. Form.
 17 **A I'm sorry. Can you repeat the question?**
 18 Q So your answer to my question with
 19 respect to what he specifically said with respect
 20 to his processing of this FOIA request, I believe
 21 your answer -- well, let me -- I'll reask it.
 22 What did he say last Friday in your

85

1 conversation with him, with respect to what his
2 role and involvement was specific to this FOIA
3 request?
4 **A I don't think he specifically recalled**
5 **any details of the -- the specific FOIA request.**
6 Q And Mr. Bair did not review any documents
7 during your call?
8 MR. GARDNER: Objection.
9 Q Or during your meeting, I'm sorry.
10 **A No.**
11 Q So did he say to you anything specific
12 with respect to the searches that were done in
13 this case?
14 **A No.**
15 Q Okay. Did he say to you last Friday when
16 you met with him anything specific with respect to
17 anything else relating to the processing of this
18 FOIA request?
19 **A No.**
20 Q I'm sorry?
21 **A No.**
22 Q Okay. Thank you. I'm sorry.

86

1 With respect to Exhibit 2, I just want to
2 go over the table of contents here.
3 MR. GARDNER: Ramona, I think that was
4 the other thing --
5 MS. COTCA: Yes.
6 MR. GARDNER: -- she had wanted to
7 clarify, about what this table of contents
8 reflects.
9 **A Right. So that this table of contents**
10 **attached to Exhibit 2 are the specific documents**
11 **that relate to this chronology. But there are**
12 **other documents that I reviewed in preparing for**
13 **today.**
14 Q Okay. But I'm specifically focusing on
15 Topic Number 1, the FOIA request at issue in this
16 case.
17 **A Right.**
18 Q So I want to be able to have an
19 understanding of what you reviewed for purposes of
20 preparing for that first topic, the FOIA request
21 at issue in this case.
22 Is it your testimony that you reviewed

87

1 all of the documents listed in the table of
2 contents that are contained in Exhibit 2?
3 **A Yes.**
4 Q Okay. What other documents that are not
5 contained in Exhibit 2 did you review to prepare
6 for your deposition to discuss the FOIA request at
7 issue in this case?
8 **A So I reviewed the documents in the six**
9 **binders.**
10 Q Do you know which ones?
11 **A I reviewed all the documents in all six**
12 **of the binders.**
13 Q Right. But I'm asking specific to Topic
14 Number 1, the FOIA request at issue in this case.
15 **A Well, it's all kind of interrelated.**
16 MR. GARDNER: I mean, do you want her to
17 take out the binders and go document by document
18 and show which relate to which topic? Because
19 that's what I hear you to be asking.
20 MS. COTCA: No. I'm just asking if she
21 has memory of what documents she reviewed for
22 purposes of her testimony about the FOIA request

88

1 at issue in this case.
2 MR. GARDNER: Yeah. And, again, she said
3 she's looked at the six binders. So I'm asking
4 you, do you want her to take them out and go
5 document by document?
6 Q Without going through the six binders,
7 are you able to say -- state what other documents
8 that are not contained in Exhibit 2, that are
9 contained in the six binders that your attorney
10 provided to plaintiff's counsel this morning, that
11 you reviewed for your testimony about the FOIA
12 request at issue in this case?
13 **A Again, I reviewed all of the documents in**
14 **the binders. And to me all of the themes are**
15 **somewhat related.**
16 **So it's difficult to say, like,**
17 **specifically this part of this document pertains**
18 **to Topic Number 1, or this part of this document**
19 **pertained to Topic Number -- you know, whatever.**
20 **I just -- I didn't organize it that way**
21 **in my head, so ...**
22 Q Who prepared the binders that were

89

1 brought here today?

2 **A Myself and the attorneys here at the**

3 **table.**

4 Q Okay. Did you organize the material in

5 the document -- in the binders in any particular

6 way?

7 **A So they're organized, we have the**

8 **Judicial Watch request, the CREW request. Then I**

9 **wanted a binder just about Benghazi.**

10 **I believe we have a binder that has all**

11 **of the depositions in it together, along with some**

12 **other miscellaneous documents that didn't fit into**

13 **a specific category.**

14 **And then Binder 4 talks -- has**

15 **information about knowledge of e-mail use. Binder**

16 **3 is related I believe to the Judicial Watch FOIA**

17 **request. As is Binder 2. And then Binder 1, this**

18 **was specific to the CREW request.**

19 Q Okay.

20 MS. COTCA: Why don't we go ahead and

21 mark the binders as Exhibit 8.

22 MR. GARDNER: Do you want to mark them as

90

1 a singular exhibit?

2 MS. COTCA: I think we're going to do

3 them separate.

4 MR. GARDNER: Okay. Binder by binder?

5 MS. COTCA: I'm sorry?

6 MR. GARDNER: Binder by binder?

7 MS. COTCA: Yeah.

8 MR. GARDNER: Just in order one through

9 six, as they're --

10 MS. COTCA: Yeah, that's fine.

11 MR. GARDNER: Okay, that's fine. Do we

12 want to go off the record so she can do it?

13 VIDEO SPECIALIST: Do you want to go off

14 the record?

15 MS. COTCA: Yeah.

16 VIDEO SPECIALIST: We are going off the

17 record at 12:12.

18 (A recess was taken.)

19 (Pitterle Deposition Exhibit 8 through

20 Exhibit 13 marked for identification, retained by

21 counsel.)

22 VIDEO SPECIALIST: We are back on the

91

1 record at 12:19.

2 BY MS. COTCA:

3 Q Ms. Pitterle, are any documents that are

4 contained in Exhibits --

5 MR. GARDNER: Oh, I'm sorry.

6 Q Sorry, Exhibit 8 through Exhibit 13, do

7 any of them contain documents that have not been

8 produced by the State Department to the plaintiff

9 in this case?

10 MR. GARDNER: Objection. Lack of

11 foundation.

12 Q Did you review all of the documents that

13 are contained in binders -- or in Exhibit 8

14 through Exhibit 13?

15 **A Yes, I did.**

16 MR. GARDNER: The foundation objection is

17 because the designee wouldn't know what has and

18 has not been produced in this case.

19 Do you want me to make -- I'm happy to

20 make a representation. Every document that is in

21 these binders has either been produced in this

22 FOIA case, another FOIA case with Judicial Watch,

92

1 or publicly available documents. And of course

2 the CREW documents.

3 MS. COTCA: Okay. And can I have a list

4 of what other Judicial Watch -- Judicial Watch

5 cases?

6 MR. GARDNER: You have to go through the

7 six binders.

8 I mean, I -- I'm not trying to play games

9 with you. That's why we gave you the binders.

10 You can flip through them at your leisure and see

11 everything that's in there. We're being

12 absolutely transparent with you.

13 MS. COTCA: You gave us the binders when

14 we arrived here this morning.

15 MR. GARDNER: Correct.

16 MS. COTCA: And we haven't had an

17 opportunity to review them.

18 MR. GARDNER: That's right. And that's

19 why I suggested we take a lunch break so you could

20 go through them.

21 BY MS. COTCA:

22 Q Ms. Pitterle, on the -- in the table of

93

1 contents of Exhibit 2, it states that you reviewed
2 the state OIG report, evaluation of the Department
3 of State's FOIA processing for records involving
4 the Office of the Secretary.
5 Is that the January 2016 OIG report?
6 **A Yes.**
7 Q Okay. And what portions of that report
8 did you review to prepare for your testimony about
9 the processing -- or the FOIA request at issue in
10 this case?
11 **A I read the entire report.**
12 Q Was there anything in the two thousand --
13 January 2016 OIG report that you reviewed listed
14 as Number 8 in the table of contents of Exhibit 2
15 about the processing or about this FOIA request
16 that you disagreed with?
17 MR. GARDNER: Objection. Form.
18 **A I'm not sure I understand what the**
19 **question is. Or how I would know.**
20 **I mean, I read the OIG's report. And, I**
21 **mean, I have to accept what they said as -- on the**
22 **face of it.**

94

1 Q Does the State Department disagree with
2 any portion in the OIG's January 2016 report
3 listed as Tab Number 8 in Exhibit 2?
4 **A I would have to --**
5 MR. GARDNER: Wait. Just hold on.
6 With respect to the processing of this
7 request or just more broadly anything in there?
8 MS. COTCA: No. With respect to this
9 FOIA request.
10 MR. GARDNER: Okay.
11 **A I don't know. I would have to pull the**
12 **document. Because I know that there were**
13 **management comments that were made, but I don't**
14 **recall specific -- if they were specific to this**
15 **case or not.**
16 Q Okay. Do you have a copy of the January
17 2016 OIG report?
18 **A Yes, I do.**
19 Q Okay. Go ahead, and if you want to take
20 a look at it.
21 **A Yes.**
22 MR. GARDNER: It's in Binder 3.

95

1 Q And in which binder are you looking?
2 **A I'm looking, it's Binder 3, Exhibit 10.**
3 Q Okay. Thank you.
4 MR. GARDNER: And just so we have a clear
5 transcript, it's Tab 8 of Exhibit 10.
6 MS. COTCA: Tab 8 of Exhibit 10. Okay.
7 MR. GARDNER: Correct.
8 MS. COTCA: Correct.
9 MS. BURKE: Thank you for clarifying.
10 MR. GARDNER: Sure.
11 THE WITNESS: Do we have any stickies?
12 MR. GARDNER: We can certainly get some.
13 Here.
14 (A discussion was held off the record.)
15 BY MS. COTCA:
16 Q Okay?
17 **A So it doesn't -- I don't see that the**
18 **department disagreed with the conclusions about**
19 **the processing of this FOIA request.**
20 Q Okay. Did the State Department disagree
21 with any conclusions that the State OIG made with
22 respect to this FOIA request in the January 2016

96

1 report?
2 **A I'm sorry. Can you say that again?**
3 Q Yes. Does the State Department disagree
4 with any of the conclusions that the State OIG
5 made with respect to the FOIA request at issue in
6 this case?
7 **A I don't believe the State Department**
8 **disagrees with the conclusion. But the**
9 **Executive -- Executive Secretariat did clarify for**
10 **the OIG about the standard practice with regard to**
11 **searching e-mail. And said that, on Page 21, the**
12 **Executive Secretariat would like to clarify for**
13 **OIG that this is standard practice department-wide**
14 **per guidance from the A bureau.**
15 Q Where are you reading that? On Page 21,
16 you said, of the report?
17 **A Yes.**
18 Q Okay. And can you just point me to where
19 exactly on the page you are?
20 **A It's the second to the last paragraph.**
21 Q Okay.
22 MR. GARDNER: And there's two different

97

1 page numbers. I believe she's referring to the
2 one on the bottom, not the top.
3 **A Sorry. Yes, the one at the bottom.**
4 Q Okay. Just for the record, the page
5 number you're referring to begins at the top, it's
6 mid sentence, Instruction from the Under Secretary
7 For Management on October 17, 2014. Is that --
8 **A That's correct.**
9 Q Okay. Thank you.
10 Okay. Any other disagreement or
11 clarification that the State Department had or has
12 with respect to any of the conclusions about the
13 State Department -- about the FOIA request at
14 issue in this case?
15 **A No.**
16 Q I'm sorry?
17 **A No.**
18 Q Okay. Well, let me ask it in a little
19 more general way.
20 Does the State Department disagree with
21 any other aspect of the January 2016 report?
22 MR. GARDNER: Objection to the extent

98

1 it's beyond the scope of the 30(b)(6).
2 THE WITNESS: Answer or ...
3 MR. GARDNER: You can answer based on
4 your personal knowledge.
5 **A Yeah, I don't have any personal**
6 **knowledge.**
7 Q Okay. With respect to any conclusions or
8 statements provided in the January 2016 OIG
9 report, does the State Department disagree with
10 any such statements or conclusions about --
11 contained therein about the CREW FOIA request from
12 December 2012?
13 **A I don't believe so.**
14 Q Okay.
15 Okay. Is that the only reference that
16 you found in the OIG report that you reviewed for
17 purposes of the FOIA request at issue in this
18 case?
19 **A I'm sorry, the only reference?**
20 MR. GARDNER: Objection. Form.
21 MS. COTCA: You know, I'll withdraw
22 because I think that's incorrect. Okay.

99

1 Q For e-mail Bates 66, 79, and 684 listed
2 under the table of contents, or as Exhibit 2, were
3 those unredacted forms of the e-mails?
4 **A So what tab number are you looking at?**
5 MR. GARDNER: So I think now she's
6 back --
7 Q I'm back at Exhibit 2.
8 MR. GARDNER: It's Exhibit 2.
9 **A Oh, sorry.**
10 Q That's okay.
11 **A And where are you looking?**
12 MR. GARDNER: She's at the table of
13 contents.
14 Q At the table of contents of Exhibit 2.
15 At the last page.
16 So for e-mail Bates Number 66, e-mail
17 Bates 79, e-mail Bates 684 appearing in the table
18 of contents, did you review redacted or unredacted
19 form of these e-mails?
20 **A I reviewed what's in the book, and I**
21 **believe those are redacted. If any of them had**
22 **redactions.**

100

1 Q I'm sorry, what was the last part?
2 **A If any of them had redactions. I'm not**
3 **sure if any of them had redactions. But I see**
4 **they do. So, yes, redacted.**
5 Q Okay. What did you do to prepare for
6 your testimony in regards to the CREW December
7 2012 FOIA request?
8 **A So I looked at a number of documents.**
9 Q What are the documents?
10 **A I didn't --**
11 Q I'm sorry.
12 **A And I also spoke to Jonathon Wasser. I**
13 **didn't -- I don't think I mentioned the CREW**
14 **request, but the search -- I wanted to understand**
15 **more about the record systems and S/ES. So that**
16 **sort of applied to both the CREW and the Judicial**
17 **Watch requests.**
18 Q Okay. And what are the documents that
19 you reviewed for preparing to testify about the
20 CREW December 2012 FOIA request?
21 **A So there were some e-mails and search**
22 **documentation.**

101

1 Q And the e-mails, who were those with?
2 A **So I believe they were between IPS and
3 the Office of Executive Secretariat.**
4 Q Was Mr. Wasser on any of the e-mails that
5 you reviewed to prepare for your testimony about
6 the CREW request?
7 A **I don't recall off of the top of my head
8 if there was a particular e-mail. But I know that
9 there was a memo that Jonathon Wasser had sent to
10 his boss, Clarence Finney, that talked about the
11 search that he had done in response to the CREW
12 request.**
13 Q Was Gene Smilansky on the e-mails that
14 you reviewed to prepare for your testimony about
15 the CREW request?
16 A **I don't recall specifically if Gene
17 Smilansky was on any of the e-mails.**
18 Q What did you do to prepare for your
19 deposition -- for your testimony about the initial
20 discovery -- and that's by the State Department --
21 in reaction to Hillary Clinton's private e-mail
22 use identified in Topic 3 of Exhibit 1?

102

1 A **So I reviewed some depositions. I also
2 reviewed the e-mail OIG report.**
3 Q I'm sorry, what OIG report?
4 A **The OIG report that had to do with
5 e-mail.**
6 Q What -- I'm sorry. What -- I'm not
7 familiar with the report. What is that report?
8 A **I don't recall what the title of it is,
9 but I can try to look it up during a break.**
10 Q Do you know when that e-mail, the OIG
11 report was issued?
12 A **Not off the top of my head, but I can
13 check.**
14 Q Do you know what year that OIG report was
15 issued?
16 A **I do not.**
17 Q Okay. And is that State OIG?
18 A **Yes.**
19 Q Okay. So you reviewed some depositions,
20 the OIG report relating to e-mail?
21 A **Yes.**
22 Q And what else?

103

1 A **Some of the memorandums concerning e-mail
2 use.**
3 MR. GARDNER: And, Ramona, just for your
4 edification, it's expressly referenced in Exhibit
5 3 at the bottom of that page, the e-mail OIG
6 report. It's Binder 4, Tab 5:
7 MS. COTCA: I understand. I'm just
8 trying to see what Ms. Pitterle remembers here
9 today. Thank you, though.
10 Q And I'm sorry, the last item you said
11 were some memorandum concerning e-mail use?
12 A **Yes.**
13 Q Okay. What -- what were the memorandum
14 concerning e-mail use that you reviewed?
15 A **So there were some letters from the State
16 Department to previous Secretaries of State,
17 asking for the return of federal records.**
18 Q And those were from 2014?
19 A **Yes.**
20 Q Is that correct? Okay.
21 And how many letters did you review in
22 that batch?

104

1 A **Yes. I'm trying to think. We can pull
2 the binder.**
3 Q That's okay.
4 A **Okay.**
5 Q What else did you review?
6 A **I think that's about it.**
7 Q Okay. With respect to some depositions,
8 which are the depositions you reviewed for your
9 testimony about the State Department's initial
10 discovery of and reaction to Hillary Clinton's
11 private e-mail use?
12 A **So I reviewed parts of Huma Abedin's
13 deposition and parts of Cheryl Mills' deposition
14 and parts of Jacob Sullivan's deposition.**
15 Q Any other deposition transcripts you
16 reviewed for this topic?
17 A **I don't know if you call it a deposition,
18 but there were some interrogatories.**
19 Q From the plaintiff in this case?
20 A **From -- there was one -- I'm not sure.**
21 Q What are the interrogatories you
22 reviewed?

105

1 **A So there is one here, Clinton December**
2 **13, 2016, response to Interrogatory Number 6.**
3 Q And what are you referring to to answer
4 that question?
5 **A Exhibit 3.**
6 Q Where in Exhibit 3?
7 **A Up at the top under the bullet, Secretary**
8 **Clinton.**
9 Q Okay. Are those the only interrogatories
10 you reviewed for purposes of your testimony about
11 the State Department's initial discovery of and
12 reaction to Hillary Clinton's private e-mail use?
13 **A No. There were other interrogatories,**
14 **including one that the State Department filed.**
15 Q I didn't hear your response. What was
16 that?
17 **A Oh. There were other interrogatories,**
18 **including one that the State Department filed more**
19 **generally. So it wasn't attributed to a specific**
20 **person, but was from the State Department.**
21 Q Interrogatories or answers to
22 interrogatories?

106

1 **A Answers to interrogatory.**
2 Q Were those in this case or in a different
3 litigation?
4 **A I believe they were in this case.**
5 MR. GARDNER: And I'm not sure that she
6 was done with her initial answer to you about the
7 depositions she reviewed to prepare for this
8 topic.
9 So I don't know if you were or you
10 weren't. But if you weren't, I --
11 MS. COTCA: I appreciate it. But I'll go
12 back and make sure.
13 MR. GARDNER: Well, she wasn't -- okay.
14 I just don't want her answer to be cut off. So if
15 she hasn't answered it completely, I think she
16 ought to be able to answer it completely.
17 MS. COTCA: I agree. But I don't think I
18 cut her off.
19 Q And, Ms. Pitterle, if I interrupt you at
20 any point, I'm sorry. Just let me know that you
21 haven't finished your answer. I do want you to
22 provide complete answers. Okay?

107

1 **A Sure.**
2 Q Any other depositions that you reviewed
3 for your testimony about the State Department's
4 initial discovery of and reaction to Hillary
5 Clinton's private e-mail use?
6 **A I also reviewed Clarence Finney's**
7 **deposition and Jonathon Wasser's deposition and**
8 **John Hackett's deposition, Gene Smilansky's**
9 **deposition, Clarence Finney's deposition.**
10 Q I believe you already mentioned Clarence
11 Finney. Did you review more than one deposition
12 transcript from Clarence Finney?
13 **A I think there was just the one.**
14 Q Okay. Any other depositions that you
15 reviewed?
16 **A I think that's about it.**
17 Q Okay.
18 **A Monica Tillery's deposition.**
19 Q What deposition of Monica Tillery did you
20 review?
21 **A It was the deposition that was conducted**
22 **on June 13 -- or June 3rd, 2019.**

108

1 Q Monica Tillery, State Department
2 official?
3 **A Yes, she is.**
4 Q Okay. Thank you.
5 And does that include the entire list of
6 depositions you reviewed for your testimony about
7 the initial discovery of and reaction to Hillary
8 Clinton's private e-mail use?
9 **A I believe so.**
10 Q Okay. And I believe you testified that
11 you reviewed portions of Ms. Abedin's deposition.
12 Do you recall what portions of her
13 deposition you reviewed on this topic?
14 **A Do you want page numbers or ...**
15 Q Yeah. Or what the subject matters were
16 about.
17 **A Sure.**
18 **So I reviewed Pages 39 to 41 of**
19 **Ms. Abedin's deposition that was taken on June 28,**
20 **2016. And it's where she's being asked about**
21 **state.gov e-mail accounts, she's talking about her**
22 **BlackBerry. Says she tried to do the right thing**

Conducted on June 19, 2019

109

1 **and tried to be on her state.gov BlackBerry and**
 2 **that was her practice. She talked about using**
 3 **Clinton e-mail was not something that she**
 4 **understood as being her primary work e-mail.**
 5 **She doesn't recall, I mean, specific**
 6 **conversations with people about using different**
 7 **forms of e-mail. She stated again that her**
 8 **practice was to use her state.gov work for e-mail.**
 9 Q Okay. And these are from Pages 39 -- 39
 10 to 41 of Ms. Abedin's deposition transcript?
 11 **A Yes.**
 12 Q Okay. And that's the deposition that she
 13 provided in the case Judicial Watch versus the
 14 State Department, Case Number 13-1363.
 15 Is that correct?
 16 **A I don't have the specific reference here.**
 17 Q Okay.
 18 MR. GARDNER: It's, just so you know,
 19 it's Binder 4, Tab 2.
 20 MS. COTCA: Thank you.
 21 MR. GARDNER: Which is exhibit -- I don't
 22 even know anymore. Exhibit 11.

110

1 Q How did you pick those pages to review of
 2 Ms. Abedin's deposition transcript for your
 3 testimony about the State Department's initial
 4 discovery of and reaction to Hillary Clinton's
 5 private e-mail use?
 6 **A It was in consultation with counsel.**
 7 Q I believe you also testified that you
 8 reviewed portions of Ms. Mills', Cheryl Mills'
 9 deposition transcript?
 10 **A Yes.**
 11 Q Is that correct? Okay.
 12 And who is Cheryl Mills?
 13 **A She was the Chief of Staff for Secretary**
 14 **Clinton.**
 15 Q Okay. And I should have asked about Huma
 16 Abedin. Who is Ms. Abedin?
 17 **A She was the Deputy Chief of Staff for**
 18 **Secretary Clinton.**
 19 Q Okay. And what portions of Ms. Mills'
 20 deposition transcript did you review for your
 21 testimony about the State Department's initial
 22 discovery of and reaction to Hillary Clinton's

111

1 private e-mail use?
 2 **A So that was the deposition of Ms. Mills**
 3 **that was taken on May 27, 2016.**
 4 Q Are you looking at one of the binders
 5 that's been marked as an exhibit?
 6 **A Yes.**
 7 Q For the record, can you just identify
 8 which binder you're looking at and what tab?
 9 **A It's Exhibit 11, and it's Tab 3.**
 10 Q Thank you.
 11 **A And it's Pages 81, 83 -- or 82, 83, 84,**
 12 **181, 182, 183, and 184.**
 13 Q And again, how did you pick these pages
 14 to review from Cheryl Mills' deposition transcript
 15 for your testimony about the State Department's
 16 initial discovery of and reaction to Hillary
 17 Clinton's private e-mail use?
 18 **A In consultation with counsel.**
 19 Q And with respect to your review of the
 20 deposition transcript of Jacob Sullivan, what
 21 portions of his deposition transcript did you
 22 review for your testimony about the State

112

1 Department's initial discovery of and reaction to
 2 Hillary Clinton's private e-mail use?
 3 **A It was the transcript that was taken on**
 4 **April 16, 2019.**
 5 Q And again for the record, you are
 6 referring to a binder that's been marked as an
 7 exhibit. And if you could just identify the
 8 binder -- the exhibit number and the tab that
 9 you're looking at.
 10 **A It's Exhibit 11, and it's Tab 4.**
 11 Q Thank you.
 12 **A And it was Pages 53 and 54 of**
 13 **Mr. Sullivan's deposition.**
 14 Q Did you review any other portion of
 15 Mr. Sullivan's deposition?
 16 **A No; that was it.**
 17 Q I'm sorry?
 18 **A I believe that was it.**
 19 Q Okay. And once more, how did you pick
 20 the pages to review from Mr. Sullivan's deposition
 21 with respect to your testimony about the State
 22 Department's initial discovery of and reaction to

113

1 Hillary Clinton's private e-mail use?
2 **A In consultation with counsel.**
3 Q Okay. And I believe you testified that
4 you reviewed the deposition transcript of Clarence
5 Finney. Is that correct?
6 **A Yes.**
7 Q Okay. And what portions of Mr. Finney's
8 deposition transcript did you review?
9 **A I read all of Mr. Finney's deposition.**
10 Q Okay. And how about Jonathon Wasser;
11 what portions of his deposition transcript did you
12 review for purposes of your testimony about the
13 State Department's initial discovery of and
14 reaction to Hillary Clinton's private e-mail use?
15 **A That's the transcript of Jonathon Wasser**
16 **that was taken on June 6, 2019, in Exhibit 11.**
17 **And it's Tab 12.**
18 Q Okay.
19 **A And they were Pages 91, 92, 93, 95, and**
20 **2096, 97, 98, and Page 179.**
21 Q Did you review Mr. Wasser's deposition in
22 its entirety for your deposition here today?

114

1 **A I believe I did, but I'm not a hundred**
2 **percent certain because I looked at a lot of**
3 **depositions.**
4 Q I'm sorry?
5 **A I said I reviewed a number of**
6 **depositions. I'm not sure his was one that I**
7 **looked at the entire -- entire deposition or just**
8 **portions of it.**
9 Q Okay. But with the binders that have
10 been marked as exhibits, I think it's Exhibit 8
11 through Exhibit 13, those binders include all the
12 documents in their entirety of what you reviewed
13 for purposes of today's deposition. Correct?
14 **A Yes.**
15 Q And you said you reviewed Monica
16 Tillery's deposition?
17 **A Yes.**
18 Q Okay. Actually, backing up to Jonathon
19 Wasser's deposition.
20 How did you pick the pages that you
21 reviewed?
22 **A In consultation with counsel.**

115

1 Q Okay. And then going to Monica Tillery's
2 deposition transcript. Did you review her entire
3 deposition transcript or just portions?
4 **A Just portions.**
5 Q Okay. And what portion did you review?
6 **A So it's the deposition that was taken on**
7 **June 3rd, 2019, which is in Exhibit 11, Tab 13.**
8 **And it was Page 76.**
9 Q Is that the only page of Ms. Tillery's
10 deposition that you reviewed?
11 **A Yes.**
12 Q Is that the only page of Ms. Tillery's
13 deposition transcript you reviewed for your
14 testimony here today?
15 **A Yes.**
16 Q I'm trying to read my scribbles. But
17 what are the other depositions that you said you
18 reviewed with respect to your testimony about the
19 State Department's initial discovery of and
20 reaction to Hillary Clinton's private e-mail use
21 that we didn't talk about?
22 **A I reviewed Gene Smilansky's.**

116

1 Q Okay. And did you review his entire
2 deposition transcript or just portions of it?
3 **A For purpose -- I believe I reviewed his**
4 **entire transcript.**
5 Q Do you have a copy of the transcript in
6 one of the binders?
7 **A I would have to take a look. I know I**
8 **have portions.**
9 **I think I just have excerpts of Gene's.**
10 Q So only excerpts are contained in the
11 binders of Mr. Smilansky's deposition transcript.
12 Is that correct?
13 **A I believe so.**
14 Q Okay. So did you only review the
15 excerpts that are contained in the binders of
16 Mr. Smilansky's deposition transcript?
17 **A I don't recall now if I read the whole**
18 **transcript or just portions of it. Because I**
19 **reviewed various depositions.**
20 Q And what are the expert -- excerpts in
21 Mr. Smilansky's deposition that you reviewed and
22 which are contained in the binders that have been

117

1 marked as an exhibit?
2 And if you can, again, identify the
3 exhibit number and the tab, that would be helpful.
4 **A Sure. So I'm looking at Exhibit 11, Tab**
5 **14. It's the transcript of Gene Smilansky, taken**
6 **June 11, 2019. And it's Page 21, 22, 64, 65, 66,**
7 **67, 68, 69, 70, 71, 79, 80, Page 81, 82, 83, 84,**
8 **85, Page 86, Page 117, 118.**
9 MR. GARDNER: I believe you skipped Page
10 20, which is the first page.
11 Q Is Page 20 contained --
12 **A Page 20.**
13 Q -- in your tab? Thank you.
14 **A Yes, Page 20's there, too.**
15 Q And how did you come up with the page
16 numbers -- or with the pages that you reviewed in
17 Mr. Smilansky's deposition transcript?
18 **A In consultation with counsel.**
19 Q Okay. And I have the same question with
20 respect to your review of the one page from Mr. --
21 Monica Tillery's deposition. How did you select
22 the page to review?

118

1 **A In consultation with counsel.**
2 Q Okay. Were there any other deposition
3 testimonies that you listed?
4 **A Mr. Hackett's --**
5 Q Okay.
6 **A -- deposition.**
7 Q And Mr. Hackett's deposition, did you
8 review that in its entirety or just portions of
9 it?
10 **A I reviewed the entire transcript.**
11 Q Okay. And is his entire transcript
12 provided in one of the binders that's been marked
13 as Exhibit 8 through Exhibit 13?
14 **A I'm not sure. I thought it was, but I**
15 **can take a look.**
16 **Yes. It is contained in Exhibit 13, Tab**
17 **Number 5.**
18 Q Thank you. And were there any other
19 depositions that you listed with respect to what
20 you reviewed for your testimony about the State
21 Department's initial discovery of and reaction to
22 Hillary Clinton's private e-mail use?

119

1 **A I think those were all of the**
2 **depositions.**
3 Q Okay. And I believe -- well, did you
4 testify as to -- did I already ask you who did you
5 speak with with respect to your testimony about
6 the State Department's discovery of and reaction
7 to Hillary Clinton's private e-mail use?
8 **A I don't think you asked me that already.**
9 Q Okay. So let me ask you now. Who did
10 you speak with to prepare for your testimony about
11 the State Department's initial discovery of and
12 reaction to Hillary Clinton's private e-mail use?
13 **A I spoke to Jamie Bair. I believe that's**
14 **all I -- I think he's the only person I spoke with**
15 **about Secretary Clinton's e-mail use.**
16 Q Okay. And did Mr. Bair provide anything
17 else in addition to what you've already testified
18 to with respect to your discussion with Mr. Bair
19 from last Friday?
20 **A No.**
21 Q Okay. With respect to Topic Number 5 of
22 Exhibit 1, what did you do to prepare for your

120

1 testimony about the State Department's -- well,
2 about the December 31, 2014, joint status report
3 noted as ECF Number 10?
4 **A I reviewed the joint status report, as**
5 **well as other documents relating to the Judicial**
6 **Watch request.**
7 Q Do you know which documents those were
8 that you reviewed for your testimony about the
9 December 31, 2014, joint status report?
10 **A I reviewed Mr. Hackett's declaration. I**
11 **reviewed the status report.**
12 **Do you have a copy of the status report?**
13 MR. GARDNER: I forget what tab it is.
14 Q Of the joint status report that -- you
15 want a copy of the joint status report that was
16 filed?
17 **A Yes.**
18 Q In this case?
19 MR. GARDNER: So it's -- so that's in
20 Binder 2, Tab 12. No? Is that not right?
21 (A discussion was held off the record.)
22 MR. GARDNER: Tab H. We've gone from

Conducted on June 19, 2019

121

1 numbers to letters.
 2 THE WITNESS: Thank you.
 3 MR. GARDNER: Sure.
 4 Q Ms. Tillery, for the record, are you
 5 looking at --
 6 MR. GARDNER: She's not Ms. Tillery.
 7 Q I'm so sorry.
 8 MR. GARDNER: See, that's why it's lunch
 9 time.
 10 Q Ms. Pitterle, for the record, are you
 11 reviewing the December 31, 2014, joint status
 12 report that was filed in this case?
 13 A Yes.
 14 Q Okay. And can you identify the exhibit
 15 number and the tab that you're looking at?
 16 A Sure. It's Exhibit 9, Tab H.
 17 Is that -- ask me your question again?
 18 Q My question is what other documents did
 19 you review for your testimony about the December
 20 31, 2014, joint status report. And then you asked
 21 to see a copy of the joint status report.
 22 A So there were a number of documents all

122

1 contained in these binders. I don't recall
 2 specifically thinking about Status Report Number
 3 2, and that I was going to look at particular
 4 documents with regard to the status report.
 5 Q Okay. So other than the joint status
 6 report and Mr. Hackett's declaration, I understand
 7 that you're testifying that you reviewed other
 8 documents, but you don't have any other specific
 9 memory of specific documents that you reviewed for
 10 your testimony in Topic Number 5 of Exhibit 1?
 11 A Because I didn't think about it in that
 12 context.
 13 Q And who did you -- did you speak with
 14 anybody with respect to your testimony about the
 15 December 31, 2014, joint status report?
 16 A No.
 17 Q Okay. And I think I skipped over one
 18 topic, so we're going to go to Number 4 in Exhibit
 19 1.
 20 With respect to the November 12, 2014,
 21 letter to Judicial Watch regarding this
 22 litigation, did you speak with anybody for your

123

1 testimony about this topic?
 2 A No.
 3 Q Okay. And did you review documents for
 4 your testimony about the State Department's
 5 November 12, 2014, letter to Judicial Watch
 6 regarding this litigation?
 7 A So I reviewed the letter and I reviewed
 8 various documents in the binders that relate to
 9 that topic.
 10 Q Do you have any specific recollection of
 11 any other document that you reviewed?
 12 A Do we have a copy of the letter?
 13 MR. GARDNER: Sure. So it's Binder 5,
 14 Tab G as in Gardner.
 15 A So it's kind of hard to distinguish again
 16 what I did to prepare specifically for that topic,
 17 because they're all interrelated. Because the
 18 November 12th letter is the response from the
 19 State Department saying that we've done a search,
 20 and that we've retrieved four documents in
 21 response to your request.
 22 So I reviewed a lot of different things

124

1 in pertaining to how the State Department
 2 conducted the search and what it did to conduct
 3 the search and what it found.
 4 So all of that, I mean, kind of is
 5 interrelated. So I don't recall specifically what
 6 portions of specific documents I might have
 7 reviewed in particular for this letter.
 8 Q Okay. With respect to the Topics Number
 9 1, 3, 4 -- no, I'm sorry, Number 1, 4, 5, and 6,
 10 with respect to identified in Exhibit 1 pertaining
 11 to Judicial Watch's FOIA request, did you review
 12 the documents that were retrieved from the initial
 13 searches that were conducted in 2014 in response
 14 to plaintiff's FOIA request?
 15 MR. GARDNER: Objection. Form.
 16 A So I'm not sure what you mean by
 17 "retrieved."
 18 Q So I'm asking specific when the searches
 19 were conduct -- searches were conducted in this
 20 case, right, in response to Judicial Watch's FOIA
 21 request? Correct?
 22 A Yes.

125

1 Q Okay. And some of those searches were
2 done in 2014. Is that correct?
3 **A Yes.**
4 Q Okay. So I'm asking about all documents
5 that were located as potentially responsive as a
6 result of the initial searches done in 2014.
7 Did you review all of those documents?
8 **A No, I did not.**
9 MR. GARDNER: I tell you what. It's 1
10 o'clock now. Would now be a good time for lunch?
11 MS. COTCA: Sure. We can go off the
12 record.
13 VIDEO SPECIALIST: We are going off the
14 record at 13:02.
15 (A recess was taken.)
16 VIDEO SPECIALIST: We are back on the
17 record at 13:58.
18 BY MS. COTCA:
19 Q Okay. Ms. Pitterle, we are moving away
20 from Exhibit 1 for now and I want to focus on -- I
21 have some questions about the processing of
22 Judicial Watch's FOIA request in this case.

126

1 **A Uh-huh.**
2 Q So when did Judicial -- when did the
3 State Department receive the FOIA request in this
4 case, if you know?
5 **A So the department received the request on**
6 **May 20th, 2014.**
7 Q Okay. And what are you referring to in
8 answering that?
9 **A Exhibit --**
10 Q Sorry.
11 **A Exhibit 2. Summary of Searches Performed**
12 **For Documents Responsive to the TP FOIA Request.**
13 Q Okay. And was the FOIA request tasked
14 for searches after -- upon receipt?
15 **A Not upon immediate receipt, but in June.**
16 **June 20, 2014. Or, I'm sorry. Edgar Jaramillo**
17 **was assigned to the request on June 20th. And it**
18 **was in July when he tasked the Executive**
19 **Secretariat.**
20 Q To conduct a search in response to
21 Judicial Watch's FOIA request. Correct?
22 **A Yes.**

127

1 Q Okay. Was that the only office that was
2 tasked to search for records in response to
3 Judicial Watch's FOIA request in this case?
4 **A No. Other offices were tasked as well.**
5 Q What were those offices?
6 **A I'm sorry. That was the only office that**
7 **was tasked, but they looked at several different**
8 **document repositories.**
9 Q Okay. Now I want to focus on searches
10 that were done in 2014 in regards to this FOIA
11 request.
12 When did the State Department initiate a
13 search?
14 **A The search was conducted -- one of the**
15 **searches was conducted on September 8th, 2014.**
16 Q And what system of records or document
17 repositories were searched as a result of the
18 September 8th?
19 **A The Executive Secretariat's electronic**
20 **databases, which included STARS, STePs, CARS, and**
21 **a TS indexing system.**
22 Q And who did that search?

128

1 **A Jonathon Wasser.**
2 Q And what are you referring to when you're
3 answering the questions?
4 **A Exhibit 2, Summary of Searches Performed**
5 **For Documents Responsive to the TP FOIA Request.**
6 Q Okay. And how long did Jonathon -- did
7 the search that Jonathon Wasser undertook on
8 September 8, 2015, take?
9 **A I think I can look that up for you.**
10 **He spent an hour performing the search.**
11 Q Okay. And how do you know that?
12 **A I'm looking at the memo that Clarence**
13 **Finney prepared for IPS.**
14 Q And just for the record, what are you --
15 can you identify the exhibit and tab number you're
16 referring to?
17 **A It's Exhibit 10, Tab 2.**
18 Q Okay. Did the search that Mr. Wasser
19 conducted on September 8, 2014, include searches
20 of any e-mails?
21 **A There may have been e-mails that were**
22 **part of the different electronic databases, but it**

Conducted on June 19, 2019

129

1 was not an e-mail system that he searched.
 2 Q Okay. And do you know which electronic
 3 databases would have contained e-mails that he
 4 searched on September 8, 2014?
5 A There may have been e-mails contained in
6 STARS, which is the secretariat tracking and
7 retrieval system.
 8 Q Okay. And that's the only system that
 9 may have contained e-mails? And again, the time
 10 frame is September 2014.
11 A Right. There may have been e-mails
12 contained in the Top Secret files.
 13 Q Okay. And as a result of the search that
 14 Mr. Wasser conducted on September 8, 2014, did the
 15 State Department locate any potentially responsive
 16 records?
17 A They did not.
 18 Q Was there a -- another search that the
 19 State Department did in 2014 in response to
 20 plaintiff's FOIA request?
21 A In 2014 Jonathon Wasser searched the PSTs
22 for the state.gov e-mail accounts of Ms. Mills,

130

1 Ms. Abedin, and Mr. Sullivan.
 2 Q And how do you know that Mr. Wasser
 3 performed a search of the PST files for
 4 Ms. Abedin, Mr. Sullivan, and Ms. Mills?
5 A Mr. Hackett testified to that in his
6 declaration. And we also provided that
7 information in response to Interrogatory Number 2.
 8 Q I'm sorry, what was the last part?
9 A Interrogatory Number 2.
 10 Q Okay. Plaintiff's Interrogatory Number 2
 11 to the State Department in this case. Correct?
12 A Yes.
 13 Q Okay. Do you have a copy of -- do you
 14 have a copy of Mr. Hackett's declaration submitted
 15 in this case dated July 7, 2015?
16 A Yes, I believe so.
 17 Q And if it's contained in one of the
 18 binders that you have, if you can identify which
 19 exhibit and the tab number.
20 A It's Exhibit 10, Tab 1.
 21 Q Okay. Thank you.
 22 Did you review this declaration?

131

1 A Yes.
 2 Q In preparation for your testimony today?
3 A Yes.
 4 Q Okay. And as a result of -- well, when
 5 did Mr. -- when did Mr. Wasser, according to your
 6 testimony, search the PST files of Ms. Mills,
 7 Ms. Abedin, and Mr. Sullivan in response to
 8 plaintiff's FOIA request in this case?
9 A September 23rd, 2014.
 10 Q And did Mr. Wasser generate any documents
 11 to memorialize the search that he conducted on
 12 September 23rd, two thousand -- 2014?
13 A No.
 14 Q And what precipitated the search of
 15 the -- of these PST files?
 16 MR. GARDNER: Objection. Form.
 17 Q Do you understand my question?
18 A Yes.
 19 Q Okay.
20 A I don't recall offhand what precipitated
21 the request.
 22 Q And who at the State Department

132

determined which PST files to search?
2 A Members of the Office of the Secretary.
 3 Q And which members were those?
4 A I don't know specifically.
 5 Q When you spoke with Mr. Wasser, did he
 6 tell you that he conducted the search on September
 7 23rd, 2014, of the PST files?
8 A No.
 9 Q Did you discuss the September 23rd, 2014,
 10 search with Mr. Wasser when you spoke with him in
 11 preparation for today's deposition?
12 A No.
 13 Q And did the search generated on
 14 September -- or did the search conducted on
 15 September 23rd, 2014, generate any potentially
 16 responsive records in response to this FOIA
 17 request?
18 A The department doesn't know how many
19 records were located by the search.
 20 Q Why not?
21 A There wasn't documentation that I could
22 find that referred to the number of documents that

Conducted on June 19, 2019

133

1 were found. And I believe at the same time they
 2 also looked at the responsive USUN documents from
 3 a different FOIA request, but for the same type of
 4 information. And through that they identified
 5 four documents.
 6 So it's unclear whether or not they found
 7 the same four documents when they searched the
 8 PSTs or not.
 9 Q Okay. Did you discuss with Mr. Wasser
 10 what the search result was in September 23rd,
 11 2014, to be able to get a clarification as to
 12 whether the State Department located any
 13 additional potentially responsive records as a
 14 result of the PST file searches?
 15 A No.
 16 Q Why not?
 17 A I didn't think to ask the question.
 18 Q Would Mr. Wasser know, have answers to
 19 this question with respect to whether potentially
 20 responsive records were located in -- as a result
 21 of the search conducted by the State Department on
 22 September 23rd, 2014, of the PST files?

134

1 MR. GARDNER: Objection. Form.
 2 A I don't know.
 3 Q Do you know who else may have that
 4 information?
 5 A Mr. Finney may have known.
 6 Q Did you -- well, you did not discuss --
 7 you did not have any conversations with
 8 Mr. Finney, for instance. Correct?
 9 A Right.
 10 Q What about Mr. Bair; would he be somebody
 11 who may have knowledge as to what potentially
 12 responsive records were located as a result of the
 13 search conducted on September 23rd, 2014, of the
 14 PST files from Cheryl Mills, Huma Abedin, and
 15 Jacob Sullivan?
 16 MR. GARDNER: Objection. Form.
 17 A He did not have any specific recollection
 18 about this particular FOIA case.
 19 Q He told you he did not have specific
 20 recollection about this particular FOIA case
 21 without reviewing any of the records pertaining to
 22 this FOIA case. Correct?

135

1 MR. GARDNER: Objection. Lack of
 2 foundation.
 3 A Correct.
 4 Q Okay. On September 23rd, 2014, who was
 5 informed of the search results?
 6 A I'm not sure who would have been
 7 informed. But typically it would have been the
 8 IPS analyst.
 9 Q And who was the IPS analyst in this case?
 10 A Monica Tillery.
 11 Q And how would she have been informed?
 12 A It could have been orally or via e-mail
 13 or via a memo.
 14 Q Who directed the supplemental search that
 15 was done on September 23rd, 2014?
 16 A I'm not sure I understand your question.
 17 Q I'm sorry. Who determined to conduct the
 18 additional search of the PST files of Cheryl
 19 Mills, Huma Abedin, and Jacob Sullivan on
 20 September 23rd, 2014?
 21 A I don't know.
 22 Q Why don't you know?

136

1 A This case happened a long time ago, and
 2 the department gets a number of FOIA requests each
 3 year. And so, it doesn't surprise me that people
 4 don't recall specifically what they did or didn't
 5 do in response to a -- one particular FOIA case.
 6 But it is general State Department
 7 practice, when doing FOIA searches, particularly
 8 those that have gone into litigation, that
 9 searches are done iteratively, on different days,
 10 for different systems. It's usually con --
 11 consultations between IPS analysts, the legal
 12 advisor's office, and the custodians of the
 13 records.
 14 Q Okay. And what -- is the State
 15 Department's practice, when conducting searches in
 16 response to FOIA requests, and specifically in
 17 September of 2014, to memorialize how the search
 18 is done, what is searched, who searched, and what
 19 records were located as potentially responsive?
 20 A In -- we're talking specifically about
 21 2014. The practices were a little more ad hoc.
 22 And so at times offices did not keep records. We

Conducted on June 19, 2019

<p style="text-align: right;">137</p> <p>1 did not have a standard search form that we used 2 for offices. 3 Q And do you know what the procedure and 4 policy was for Mr. Finney and Mr. Wasser's office 5 within the Executive Secretariat? 6 A I don't know what their specific policies 7 were. 8 Q Subsequent to September 23rd, 2014, was 9 there any other additional searches that were done 10 in 2014 in response to Judicial Watch's FOIA 11 request? 12 A So I'm not sure you could call it a 13 separate search. But IPS and the lawyers did 14 review the documents that were produced in the 15 FOIA case having to do with USUN, that was of a 16 similar type question, to make sure that they -- 17 that nothing had been missed. 18 Q Okay. And what was the result of that 19 review? 20 A They found four documents. Or they 21 identified four documents that were responsive. 22 Q And were those four documents also</p>	<p style="text-align: right;">139</p> <p>1 Q What are you looking at to provide the 2 answer? 3 A Exhibit 2. 4 Q Let's see. I've got a lot of documents 5 here. 6 Okay. And what -- what page exactly on 7 Exhibit 2 are you referring to? 8 A Page 2. The fourth full bullet. 9 Q Where it says "Date range for search"? 10 A Yes. 11 Q Okay. And I guess my question is with 12 respect to your testimony that Mr. Wasser extended 13 the date range to September 23rd, 2014. 14 A Uh-huh. 15 Q When did Mr. -- well, on here you have 16 Wasser confirmed in writing that he extended the 17 date range to September 23rd, 2014. 18 When did Mr. Wasser confirm that? 19 A I'm not sure. 20 Q Okay. What -- what is the basis for the 21 information -- for the statement here that Wasser 22 confirmed in writing that he extended the date</p>
<p style="text-align: right;">138</p> <p>1 produced to Judicial Watch in a previous FOIA 2 litigation, with the same request but to 3 Ambassador Rice's office, as opposed to the 4 Secretary's office? 5 A Yes, that's my understanding. 6 Q Okay. And let me ask you, with respect 7 to the searches that you've testified to so far, 8 which would be the September 8th search, the 9 September 23rd search, and then -- I'm not sure, 10 when was the last search done? 11 A USUN, it -- there's a date range of 12 September 29th to November 10th, 2014. 13 Q Okay. When -- well, let's focus on 14 the -- well, for all these three searches, what 15 was the date range that the State Department used 16 to conduct these searches? 17 MR. GARDNER: Objection. Form. 18 A So originally for the database searches 19 that Jonathon Wasser conducted, he searched 20 beginning September 1st, 2012, through December 21 31st, 2012. But later, in refining the search, it 22 was done through September 23rd, 2014.</p>	<p style="text-align: right;">140</p> <p>1 range to September 23rd, 2014? 2 A I would have to look through the binders 3 maybe during a break to find that information. 4 Q Because this is news to us. By "us" I 5 mean the plaintiff. 6 Do you know when Mr. Wasser extended the 7 date range to September 23rd, 2014? 8 A No. But I can try to look that up during 9 the break as well. 10 Q Do you know if Mr. Wasser memorialized 11 extending the date range to September 23rd, 2014, 12 whenever that was? 13 A I would have to take a look at that. But 14 that is also, I believe, what is in Mr. Hackett's 15 declaration. And so our practice is when a 16 declaration is drafted, that people who are 17 involved in what's being discussed in the 18 declaration have an opportunity to review it. 19 Q Okay. 20 A And both Mr. Wasser and Mr. Finney 21 reviewed that declaration. 22 Q Okay. So --</p>

Conducted on June 19, 2019

<p>141</p> <p>1 A And said it was accurate.</p> <p>2 Q Okay. So you say that that's contained</p> <p>3 in Mr. Hackett's declaration.</p> <p>4 Do you have a copy of Mr. Hackett's</p> <p>5 declaration?</p> <p>6 A I do.</p> <p>7 Q Okay.</p> <p>8 A This is the exemptions. Let me find it.</p> <p>9 Q Where in Mr. Hackett's declaration are</p> <p>10 you relying on to say that Mr. Wasser extended the</p> <p>11 date range search to September 23rd, 2014?</p> <p>12 A Give me one moment to find the</p> <p>13 declaration.</p> <p>14 MR. GARDNER: It's Tab 2 -- Tab 1.</p> <p>15 THE WITNESS: Is it that one? Okay.</p> <p>16 Q And, actually --</p> <p>17 A So --</p> <p>18 Q -- let me just point your attention to</p> <p>19 Paragraph 8 in Mr. Hackett's declaration.</p> <p>20 A Yeah.</p> <p>21 Q Is that the one you were going to --</p> <p>22 A Yes.</p>	<p>143</p> <p>1 about?</p> <p>2 Q The September 9 search.</p> <p>3 A I have a September 8 search, a September</p> <p>4 23rd. Was there --</p> <p>5 Q The September 8 search.</p> <p>6 A Oh. So, I'm sorry, and the question was?</p> <p>7 Q What was the date range used by</p> <p>8 Mr. Wasser for that search?</p> <p>9 A So initially he had searched the shorter</p> <p>10 time frame, but then he -- it was expanded to the</p> <p>11 longer time frame.</p> <p>12 Q Okay. So can you identify what the</p> <p>13 shorter time frame is that Mr. Wasser used to</p> <p>14 conduct the search in this case?</p> <p>15 A September 1st, 2012, through December</p> <p>16 31st, 2012.</p> <p>17 Q Okay. And other than Paragraph 8 in</p> <p>18 Mr. Hackett's declaration, is there anything else</p> <p>19 you rely on for your testimony that Mr. Wasser</p> <p>20 extended his search that he conducted on September</p> <p>21 8th, 2013, up to include through September 23rd,</p> <p>22 2014?</p>
<p>142</p> <p>1 Q -- tell me about? Okay.</p> <p>2 So according to Paragraph 8 of</p> <p>3 Mr. Hackett's declaration, it appears that the</p> <p>4 State Department did a search from September 11,</p> <p>5 2012, through September 23rd, 2014, the date that</p> <p>6 the search was conducted.</p> <p>7 Do you see that?</p> <p>8 A Yes.</p> <p>9 Q Okay. Is that the only place in</p> <p>10 Mr. Hackett's declaration that you rely on to</p> <p>11 testify that Mr. Wasser extended the date range</p> <p>12 from -- to September 23rd, 2014?</p> <p>13 A I haven't memorized the declaration, so</p> <p>14 I'm not sure if there are other sections in the</p> <p>15 declaration that talk about the date range,</p> <p>16 but ...</p> <p>17 Q Do you want to take a look at it?</p> <p>18 A That's all right.</p> <p>19 Q So was the date range that Mr. Wasser</p> <p>20 used during the September 9, 2014, search</p> <p>21 September 1, 2012, through December 31, 2012?</p> <p>22 A I'm sorry. What search are you talking</p>	<p>144</p> <p>1 A No.</p> <p>2 Q Do you know why Mr. Wasser -- why the</p> <p>3 date range was used from September 1, 2012,</p> <p>4 through December 31, 2012, even though Secretary</p> <p>5 Clinton was still in office from January 1, 2013,</p> <p>6 through February 1, 2013?</p> <p>7 MR. GARDNER: Objection. Form.</p> <p>8 A No.</p> <p>9 Q Then with respect to the search that was</p> <p>10 done on September 23rd, what was the date range</p> <p>11 that was used for that search?</p> <p>12 A So I believe it was September 1st, 2012,</p> <p>13 through September 23rd, 2014.</p> <p>14 Q And what do you rely on to answer that</p> <p>15 question?</p> <p>16 A Mr. Hackett's declaration.</p> <p>17 Q And, again, just Paragraph 8 in</p> <p>18 Mr. Hackett's declaration?</p> <p>19 A Yes.</p> <p>20 Q And then with respect to the third search</p> <p>21 that you identified at this point, which was the</p> <p>22 documents that were produced in the previous FOIA</p>

145

1 request, do you know what the date range was used
2 to conduct the searches in that case?
3 **A No.**
4 Q Were there any additional searches in
5 2014 that were -- that the State Department
6 undertook in response to plaintiff's FOIA request?
7 **A I'm sorry, that were conducted -- give me**
8 **the date again.**
9 Q In 2014.
10 **A I think that was it for 2014.**
11 Q And did the State Department respond to
12 plaintiff's FOIA request in 2014?
13 **A Yes.**
14 Q When did the State Department do that?
15 **A I believe it was in November of 2014.**
16 Q Is that the November 12, 2014, letter
17 that you were referring to?
18 **A Let me just check.**
19 **Yes, November 12, 2014.**
20 Q Okay. And did you review the documents
21 that the State Department produced with its
22 response on November 12, 2014?

146

1 **A Yes, I did.**
2 Q Okay. And all of those documents were
3 produced in the other case. Correct?
4 **A Yes.**
5 Q Okay. And subsequent to November 12,
6 2014, were there any additional searches in 2014
7 that were done in this -- in this case?
8 **A No.**
9 Q Okay. Do you have a copy of the
10 memorandum that Mr. Finney sent to Monica Tillery
11 on November 17, 2014, in response to plaintiff's
12 FOIA request?
13 **A I believe so.**
14 **Yes, I have it.**
15 Q Okay. And it references two documents
16 that were retrieved as an -- as a search that was
17 conducted -- well, when was the search conducted
18 that's reflected on November 17, 2014, memo from
19 Mr. Finney to Ms. Tillery, in this case?
20 **A It's not clear which search it's**
21 **referring to.**
22 Q Do you know when the search was

147

1 conducted?
2 **A It's not clear if it's referring to the**
3 **September 8th or to all of the searches up until**
4 **that point, or to one in particular.**
5 Q Well, this references only two documents
6 located as a result of this search. Correct?
7 **A Yes.**
8 Q Okay. What are the two documents that
9 are referenced in this letter?
10 **A I don't know what the two specific**
11 **documents are.**
12 Q Did you discuss with Mr. Wasser what the
13 two documents are?
14 **A No.**
15 Q Did you discuss with Mr. Bair what these
16 two documents are that are referenced in the
17 November 17, 2014, memo from Mr. Finney to
18 Ms. Tillery?
19 **A No.**
20 Q Why didn't you raise it with either of
21 them?
22 **A I didn't think to ask the question.**

148

1 Q Okay. So I'm looking at Exhibit 2, on
2 Page 4, where you actually have a section written
3 for memo from Clarence Finney from Monica Tillery,
4 November 17, 2014.
5 Do you see that?
6 **A Yes.**
7 Q Okay. And you stated here, "It is not
8 clear whether the November 17 memo was ever sent
9 to IPS, though it is initialed by Finney."
10 Do you see that?
11 **A Yes.**
12 Q What is the basis -- why -- what's the
13 basis that you wrote here that it is not clear
14 whether the November 17 -- and I presume it's
15 2014 -- memo was -- was -- whether it was ever
16 sent to IPS?
17 **A IPS, this memo is not included in the**
18 **case files.**
19 Q So where was this memo retrieved from?
20 **A I believe Mr. Finney produced it, but I'm**
21 **not sure.**
22 Q Why aren't you sure whether Mr. Finney

Conducted on June 19, 2019

149	151
<p>1 produced it or not?</p> <p>2 A I'm just not sure.</p> <p>3 Q Did you ask Mr. Wasser whether Mr. Finney</p> <p>4 produced this or whether this document came from</p> <p>5 the IPS?</p> <p>6 A No.</p> <p>7 MR. GARDNER: Objection. Form.</p> <p>8 Q So going back to my question, I guess.</p> <p>9 You said it didn't occur to you to ask Mr. Wasser</p> <p>10 questions relating to this memo.</p> <p>11 Based on the fact that you wrote here, It</p> <p>12 is not clear whether this memo was ever sent to</p> <p>13 IPS or where this document was retrieved from, why</p> <p>14 didn't it occur to you to ask Mr. Wasser about</p> <p>15 this memo?</p> <p>16 A It just didn't occur to me.</p> <p>17 Q Does the State Department have a way of</p> <p>18 being able to locate what the two documents are</p> <p>19 that are referenced in the November 17, 2014,</p> <p>20 memo?</p> <p>21 A I don't think so. I believe they looked</p> <p>22 and there wasn't any -- this wasn't in the case</p>	<p>1 A I believe the attorneys here at the State</p> <p>2 Department.</p> <p>3 Q By "the attorneys," are you meaning the</p> <p>4 attorneys representing you here today --</p> <p>5 A Yes.</p> <p>6 Q -- at the deposition?</p> <p>7 And did Mr. Hackett discuss this search</p> <p>8 in his declaration that he produced in this case?</p> <p>9 And by "this search," I meant the search</p> <p>10 that's reflected in the November 17, 2014, memo.</p> <p>11 A I don't think he specifically refers to a</p> <p>12 November 17 search.</p> <p>13 Q Then the State Department, just to make</p> <p>14 sure the record is clear, after the November 12,</p> <p>15 2014, letter, did not inform Judicial Watch of any</p> <p>16 search that was done subsequent in 2014. Correct?</p> <p>17 MR. GARDNER: Objection. Form.</p> <p>18 A I don't believe there were any searches</p> <p>19 that were conducted -- I'm sorry. Say that again?</p> <p>20 Q Subsequent to State Department's letter</p> <p>21 to Judicial Watch on November 12, 2014, with the</p> <p>22 document production in this case, the State</p>
150	152
<p>1 file. And so there wasn't anything to look at in</p> <p>2 the case file.</p> <p>3 Q And when you say "the case file," what --</p> <p>4 what do you mean by the case file?</p> <p>5 A The FOIA case file for this particular</p> <p>6 case.</p> <p>7 Q Okay. And the case file initially I</p> <p>8 think you said was in IPS. Is that a file</p> <p>9 contained within IPS?</p> <p>10 A Yes.</p> <p>11 Q Okay. And then does Mr. Finney's office</p> <p>12 within the Executive Secretariat, they have their</p> <p>13 own record system? Is that correct?</p> <p>14 A Yes.</p> <p>15 Q Okay. Do you know if the record system</p> <p>16 from Mr. Finney's office would be able to retrieve</p> <p>17 the two documents that are referenced in the</p> <p>18 November 17, 2014, memo?</p> <p>19 A I don't know.</p> <p>20 Q So earlier you testified that you believe</p> <p>21 they looked in the case file for this November 17,</p> <p>22 2014. Who is the "they"?</p>	<p>1 Department did not inform Judicial Watch about any</p> <p>2 other searches that were done as reflected in</p> <p>3 November 17, 2014. Correct?</p> <p>4 MR. GARDNER: Objection. Form.</p> <p>5 A I don't -- there was -- I don't think</p> <p>6 there was anything to say about the November 17</p> <p>7 search.</p> <p>8 Are you talking about after?</p> <p>9 Q Yeah. I meant, I'm speaking specific to</p> <p>10 the memo dated --</p> <p>11 A 2014?</p> <p>12 Q Yes. 2014, specific to the November 17,</p> <p>13 2014.</p> <p>14 MR. GARDNER: Same objection. Form.</p> <p>15 A I don't think there was a separate search</p> <p>16 conducted. It's all part of the same search.</p> <p>17 Right?</p> <p>18 Q Do you know if the two documents</p> <p>19 referenced in November 17, 2014, were re -- were</p> <p>20 found to be responsive to plaintiff's FOIA</p> <p>21 request?</p> <p>22 A I don't know what the two documents are,</p>

Conducted on June 19, 2019

153

1 **so I don't know if they were found to be**
 2 **responsive or not.**
 3 Q Did you ask Mr. Wasser if the two
 4 documents referenced in the November 2014 were
 5 relevant to the FOIA request plaintiff submitted
 6 to the State Department --
 7 A **I didn't.**
 8 Q -- in this case?
 9 A **I didn't ask him about this memo or the**
 10 **documents.**
 11 Q And after -- with respect to processing
 12 of this FOIA request, at that point it was in
 13 litigation. Correct?
 14 A **Yes.**
 15 Q Okay. And after the November 12 letter,
 16 did the State Department engage in settlement
 17 discussions with Judicial Watch in 2014?
 18 A **I don't know if there were settlement**
 19 **discussions. But there were status reports and**
 20 **things going back and forth between the department**
 21 **and DOJ and Judicial Watch.**
 22 Q Are you familiar with the Vaughn index?

154

1 A **I am not sure if I saw the Vaughn index**
 2 **or not.**
 3 Q Are you familiar with what it is?
 4 A **Yes.**
 5 Q What is it?
 6 A **It's an index of documents, and it talks**
 7 **about the exceptions that are taken in the**
 8 **documents.**
 9 Q Okay. And you reviewed the state -- the
 10 joint status report that was filed in this case in
 11 December of 2014. Is that right?
 12 A **Yes.**
 13 Q Okay.
 14 A **And I think, actually, was the -- I think**
 15 **the Vaughn index was attached to that. So I**
 16 **looked at it when I looked at the status report, I**
 17 **believe.**
 18 Q I don't believe the Vaughn index was
 19 attached with the court filing. I'm not sure what
 20 you reviewed. But just so the record is clear, I
 21 don't believe the draft -- draft Vaughn index was
 22 attached to the December 31, 2014, joint status

155

1 report filed in this case.
 2 Do you recall the December 31, 2014,
 3 joint status report informing the court that the
 4 State Department and plaintiff were engaged in
 5 settlement discussions at that point?
 6 A **I'd have to take a look at it to see what**
 7 **it specifically said.**
 8 Q Okay.
 9 THE WITNESS: Do you know what binder
 10 that might be in?
 11 MR. GARDNER: I think it's ...
 12 (A discussion was held off the record.)
 13 A **Yes, I see it there.**
 14 Q Okay. So is it your testimony that the
 15 State Department had started engaging with
 16 Judicial Watch in settlement discussions of this
 17 case in December of 2014?
 18 A **That's what it says, so I believe that's**
 19 **correct.**
 20 Q Well, I'm asking as to what your
 21 testimony is with regard to the State Department's
 22 position in this case, since you were designated

156

1 as the corporate representative of the State
 2 Department in this case.
 3 A **Yes.**
 4 Q Going back just briefly to the November
 5 17, 2014, memo referencing the two documents.
 6 Did the State Department inform the
 7 Department of Justice attorneys about the two
 8 documents referenced in that memo?
 9 MR. GARDNER: Objection. Form.
 10 A **I don't know.**
 11 Q Why don't you know?
 12 MR. GARDNER: Objection. Form.
 13 Q Do you understand the question?
 14 A **Can you say it again?**
 15 Q Why don't you know?
 16 A **Why don't I know?**
 17 MR. GARDNER: Objection. Form.
 18 Q Whether the State Department informed
 19 Department of Justice attorneys about the two
 20 documents referenced in the November 17, 2014,
 21 memo.
 22 MR. GARDNER: Objection. Form.

157

1 **A I didn't ask.**
2 Q And how long did the search take that is
3 reflected in the November 17, 2014, memorandum?
4 MR. GARDNER: Objection. Objection,
5 form.
6 **A It says that Mr. Wasser spent three hours**
7 **performing the search.**
8 Q Okay.
9 Okay. Ms. Pitterle, I'm looking at
10 Exhibit 3 of the documents that you brought here
11 with you today.
12 Actually, before we change subjects, did
13 the State Department continue to engage in
14 settlement discussions with Judicial Watch after
15 December 31, 2014?
16 **A I'm not sure.**
17 Q Okay. I'm referring you to Exhibit 3.
18 Here you have a notation on -- on Page 2,
19 the point where you say senior officials -- that
20 "Dozens of senior officials throughout the
21 department, including members of Secretary
22 Clinton's immediate staff, exchanged e-mail with

158

1 Secretary using personal accounts used to conduct
2 official business."
3 What did -- what did you -- well, let me
4 ask you, is this -- is it true that dozens of
5 senior officials throughout the State Department,
6 including members of Secretary Clinton's immediate
7 staff, exchanged e-mails with Secretary using
8 personal accounts she used to conduct official
9 business?
10 MR. GARDNER: Objection. Form.
11 **A Yes.**
12 Q And the time frame of when senior
13 officials knew that Secretary Clinton was using
14 personal accounts to conduct official business was
15 during her tenure at the State Department?
16 **A Yes.**
17 Q And is it true that Patrick Kennedy, the
18 Under Secretary for Management, was also aware of
19 Secretary Clinton's use of a personal account to
20 conduct official business?
21 **A Yes.**
22 MR. GARDNER: Objection. Form.

159

1 Q Okay. And the time frame for that would
2 be in 2013?
3 **A Yes.**
4 Q Okay. And then from June 2013 to July
5 2014, did State Department staff with records
6 management role have a growing awareness of the
7 Secretary -- of Secretary Clinton's use of
8 personal e-mail for official government business?
9 **A Yes, that's correct.**
10 Q I'm sorry. I can't hear your answer.
11 **A Yes, that's correct.**
12 Q Okay. Thank you.
13 And can you identify the staff, the State
14 Department staff with record management roles who
15 had a growing awareness of Secretary Clinton's use
16 of e-mail for State Department business?
17 **A I believe that John Hackett and Ms.**
18 **Walter were two of the IPS people who over time**
19 **became aware that she was using -- that Ms.**
20 **Clinton was using personal e-mail for some of her**
21 **business.**
22 Q Well, what about Ms. Margaret Grafeld; do

160

1 you know who she is?
2 **A Yes, I do.**
3 Q Okay. Who is she?
4 **A She was the Deputy Assistant Secretary of**
5 **the Global Information Services. And I believe**
6 **she was another individual who also began to have**
7 **a growing awareness.**
8 Q Growing awareness of?
9 **A Secretary Clinton's use of e-mail.**
10 Q And what -- during what time frame?
11 **A Sort of between the 2013, 2014 time**
12 **frame.**
13 Q And Ms. Grafeld's office, she oversaw
14 IPS. Is that correct?
15 **A Yes.**
16 Q And just to make sure we have this on the
17 record, IPS was in charge of handling the entire
18 FOIA program at the State Department.
19 Is that correct?
20 **A Correct.**
21 Q Okay. And as part of the
22 responsibilities in handling the FOIA program, the

Conducted on June 19, 2019

161

1 responsibilities of IPS were to ensure that the
2 State Department responded to FOIA requestors
3 completely and accurately with all responsive
4 records under FOIA. Correct?

5 **A Correct.**

6 Q Did the State Department at any point
7 from July 2014 through December 31, 2014, when the
8 parties filed a joint status report in this case,
9 and by which time the State Department had engaged
10 Judicial Watch in settlement discussions, disclose
11 to Judicial Watch or the court that the State
12 Department was aware of a system of records
13 pertaining to Secretary Clinton during her time at
14 the State Department?

15 MR. GARDNER: Objection. Form.

16 **A So I wouldn't describe it as a system of**
17 **record. But various officials at various points**
18 **became aware that she was using personal e-mail**
19 **for some of her official business.**

20 Q Okay. Did at any point during that time
21 frame State Department inform the plaintiff, while
22 it was engaging the plaintiff in settlement

162

1 discussions, as to -- or that it was aware that
2 Secretary Clinton used personal e-mail to conduct
3 State Department business?

4 **A I don't think the department knew the**
5 **extent to which she used personal e-mail for her**
6 **business at the time they -- you all were doing**
7 **your discussions.**

8 Q Okay. So let's -- let's focus on
9 actually what I'm asking.

10 So my question actually is, in 2014,
11 prior to the December 31, 2014 -- 2014 joint
12 status report, and specifically focusing during
13 the time that State Department was responding and
14 had responded to Judicial Watch in this case and
15 engaged Judicial Watch in settlement discussions,
16 did the State Department inform the plaintiff in
17 this case about -- that State Department
18 officials, such as Ms. Walter, Ms. Grafeld, or
19 Mr. Hackett, had knowledge that Secretary Clinton
20 had e-mails -- had used e-mails for State
21 Department business?

22 MR. GARDNER: Objection. Lack of

163

1 foundation.

2 **A No.**

3 Q I want to focus on the time frame that
4 you mentioned from June 2013 through July of 2014,
5 when senior staff with records management role had
6 growing awareness of the Secretary's use of
7 e-mails.

8 Did anyone at State inform any of the
9 Department of Justice attorneys at that point with
10 respect to Secretary Clinton's e-mail use?

11 **A I don't know.**

12 Q Okay. Going back to the question I asked
13 you before, which you responded that the State
14 Department did not inform plaintiff that it had
15 knowledge -- the State Department had knowledge
16 that Secretary Clinton had -- had used e-mails for
17 State Department business in 2014.

18 Why -- why didn't the State Department
19 inform plaintiff of that fact?

20 **A They didn't know if there were any**
21 **responsive documents. We didn't have Secretary**
22 **Clinton's e-mails at that point. So there really**

164

1 **wasn't anything to say.**

2 Q In September -- in August of 2014, wasn't
3 the State Department aware that Secretary Clinton
4 would return hard copies of her e-mails to the
5 State Department?

6 **A So over that summer and that time frame,**
7 **we asked for documents to be returned. But we**
8 **weren't sure what was going to be returned and**
9 **when.**

10 Q The question is, was the State Department
11 aware as early as July of 2014 -- was the State
12 Department made aware, as early as July of 2014 or
13 August of 2014 by Ms. Mills, that Secretary
14 Clinton would return hard copies of her State
15 Department-related e-mails?

16 MR. GARDNER: Objection. Form.

17 **A So in August 2014, Secretary -- Cheryl**
18 **Mills, I guess, did indicate that they -- that**
19 **they were starting to go through some of Secretary**
20 **Clinton's e-mails in response to a request from**
21 **the State Department. But at that point the**
22 **department did not know if anything was going to**

165

1 **be returned, was going to be given to the State**
2 **Department or what it was.**
3 Q What are you referring to to answer that?
4 **A Exhibit 4, Timeline, Secretary Clinton's**
5 **E-Mail Use.**
6 Q And where exactly are you looking at?
7 **A August 2014.**
8 Q By December 5th, 2014, was the State
9 Department at that point aware as to the volume of
10 records that -- or e-mails that Secretary Clinton
11 would return to the State Department relating to
12 her State Department business?

166

13 **A No.**
14 Q Did the State Department receive
15 Secretary Clinton's e-mails contained in 12
16 bankers boxes that were produced to the State
17 Department on December 5th, 2014?
18 **A Yes.**
19 Q Okay. So is it still your testimony that
20 the State Department did not have knowledge as to
21 the volume of e-mails that Secretary Clinton
22 returned to the State Department as of December

167

1 Why didn't the State Department look
2 through the e-mails that Secretary returned on
3 December 5th, 2014, to determine if any were
4 potentially responsive in this case, while it was
5 engaging in settlement discussions with the
6 plaintiff?
7 **A So it had to do -- it made several copies**
8 **of the entire sets of the documents. And they put**
9 **them in folders. And they didn't start looking**
10 **through them I believe until after the Christmas**
11 **holidays.**
12 Q Why did the State Department continue to
13 engage in settlement discussions with Judicial
14 Watch, when it knew that it had obtained 12 banker
15 boxes of Secretary Clinton's e-mails from her
16 tenure at the State Department?
17 **A It didn't know what was in the boxes.**
18 Q I understand you didn't know, or the
19 State Department says that it didn't know what was
20 in the boxes. But why not inform plaintiff that
21 there is a potential source or system of records
22 that are potentially -- contain potentially

168

1 responsive records to plaintiff's FOIA request in
2 this case --
3 **A So --**
4 Q -- in December of 2014, while it was
5 engaging with plaintiff to settle this case?
6 **A Because I believe in December the State**
7 **Department and DOJ did say that there were**
8 **additional searches that needed to be conducted.**
9 Q And when was that?
10 **A Let me pull out the relevant document.**
11 THE WITNESS: Do you know?
12 MR. GARDNER: Exhibit 10, Tab L, Binder
13 2.
14 MS. COTCA: I'm sorry, can you let me
15 know what you're pointing the witness to?
16 MR. GARDNER: Yeah. She had asked me
17 where the February status report was. And I was
18 telling her it is Tab L -- actually, I'm sorry.
19 Is this the wrong one?
20 No. No. This is -- no. Sorry.
21 THE WITNESS: Is that --
22 MR. GARDNER: No. I've given you bad

Conducted on June 19, 2019

<p>169</p> <p>1 info. It is -- sorry, Tab I in Exhibit 2.</p> <p>2 A So it was actually in February of 2015.</p> <p>3 Q Okay. So I want to -- I'm focusing my</p> <p>4 questions on 2014.</p> <p>5 So again my question is, why in December</p> <p>6 of 2014, when the State -- why did the State</p> <p>7 Department continue to engage in settlement</p> <p>8 discussions with the plaintiff in this case in</p> <p>9 December of 2014 while it knew that it had 12</p> <p>10 boxes of -- 12 banker boxes of Secretary Clinton's</p> <p>11 e-mails relating to her time at the State</p> <p>12 Department?</p> <p>13 MR. GARDNER: Objection. Asked and</p> <p>14 answered.</p> <p>15 A It didn't know specifically what was in</p> <p>16 those boxes, and it wasn't until February 9th that</p> <p>17 the agency records officer did an appraisal report</p> <p>18 of what was in the boxes.</p> <p>19 Q In December of 2014 did Department of</p> <p>20 Justice attorneys know that Secretary Clinton</p> <p>21 returned e-mails to the State Department on</p> <p>22 December 5th, 2014?</p>	<p>171</p> <p>1 MS. COTCA: So I'm asking why she doesn't</p> <p>2 know.</p> <p>3 BY MS. COTCA:</p> <p>4 Q Did you speak with anybody with respect</p> <p>5 to what the Department of Justice attorneys knew</p> <p>6 in December 2014 about -- whether they knew in</p> <p>7 December of 2014 about Secretary Clinton's return</p> <p>8 of her e-mails on December 5th, 2014?</p> <p>9 A I didn't ask.</p> <p>10 Q Did the State Department inform</p> <p>11 Department of Justice attorneys about the e-mails</p> <p>12 received on December 5th, 2014? And the time</p> <p>13 frame is December of 2014.</p> <p>14 A I don't know.</p> <p>15 Q Would Mr. Bair have that information?</p> <p>16 A I don't know.</p> <p>17 Q Did you ask Mr. Bair whether he knows?</p> <p>18 A No.</p> <p>19 Q Did the State Department try to push</p> <p>20 settlement before a review took place of Secretary</p> <p>21 Clinton's e-mails returned to the State Department</p> <p>22 on December 5th, 2014?</p>
<p>170</p> <p>1 A I believe they did.</p> <p>2 Q Okay. Did Department of Justice Attorney</p> <p>3 Robert Prince know that e-mails were returned on</p> <p>4 December 5th, excuse me, in December of 2014?</p> <p>5 A I don't know.</p> <p>6 Q Who are the DOJ attorneys that were</p> <p>7 informed about this fact?</p> <p>8 A And I'm sorry, were you asking about 2014</p> <p>9 or February of 2015?</p> <p>10 Q No, I'm asking specific to December 2014.</p> <p>11 A Oh, I don't know if the -- if the</p> <p>12 Department of Justice lawyers knew at that point.</p> <p>13 Q Why not?</p> <p>14 A I don't know.</p> <p>15 Q Well, didn't you prepare to testify in</p> <p>16 this case with respect to what was known and when</p> <p>17 was known in the process of processing this FOIA</p> <p>18 request?</p> <p>19 MR. GARDNER: She's here to testify on</p> <p>20 behalf of the State Department's knowledge.</p> <p>21 MS. COTCA: Correct.</p> <p>22 MR. GARDNER: Yes.</p>	<p>172</p> <p>1 MR. GARDNER: Objection. Form.</p> <p>2 A Can you say the question again?</p> <p>3 Q Did the State Department try to push</p> <p>4 settlement before a review took place of Secretary</p> <p>5 Clinton's e-mails?</p> <p>6 A I'm not sure what you mean by "push."</p> <p>7 Q Did the State Department attempt to</p> <p>8 settle this case or try to encourage plaintiff to</p> <p>9 settle this case prior to reviewing Secretary</p> <p>10 Clinton's e-mails that she returned on December</p> <p>11 5th, 2014?</p> <p>12 A I don't think the two things are linked.</p> <p>13 That was the normal course of the litigation, that</p> <p>14 they were filing the status reports in conjunction</p> <p>15 with you.</p> <p>16 Q When did the State Department inform</p> <p>17 Department of Justice attorneys that Secretary</p> <p>18 Clinton returned e-mails on December 5th, 2014?</p> <p>19 A I don't know.</p> <p>20 MR. GARDNER: We've been going about an</p> <p>21 hour. Are you ready for a break?</p> <p>22 MS. COTCA: We can take a quick break, if</p>

173

1 you would like.
2 MR. GARDNER: Yeah. Let's do it.
3 VIDEO SPECIALIST: We are going off the
4 record at 15:06.
5 (A recess was taken.)
6 VIDEO SPECIALIST: We are back on the
7 record at 15:34.
8 MR. GARDNER: And I believe the witness
9 wanted to make one correction.
10 THE WITNESS: Yes. So you had asked me
11 about whether or not I had asked Jamie Bair about
12 whether or not he had told -- or whether anyone at
13 State had told the Department of Justice about the
14 return of Secretary Clinton's e-mails. And so we
15 did ask -- I did ask Jamie Bair. And he said he
16 didn't recall when he told DOJ.
17 BY MS. COTCA:
18 Q And what refreshed -- helped refreshed
19 your recollection during the break we just had?
20 **A Counsel.**
21 Q Okay. Did you during the break contact
22 Mr. Bair to confirm whether it is true that,

174

1 indeed, you did discuss with him whether
2 Department of Justice attorneys were informed
3 about Secretary Clinton's e-mails?
4 MR. GARDNER: Objection. Form.
5 **A I did not speak to Mr. Bair during the**
6 **break.**
7 Q Is Mr. Bair still at the State
8 Department?
9 **A He's on detail on -- on the Hill.**
10 Q And while he's on detail up on the Hill
11 is he still employed by the State Department?
12 **A Yes, he is.**
13 Q Okay. Is there a reason that you did not
14 contact Mr. Bair to confirm with him whether he
15 knows if Department of Justice attorneys were
16 informed about the return of Secretary Clinton's
17 e-mails in December of 2014?
18 MR. GARDNER: Objection.
19 Mischaracterizes the witness' testimony.
20 Q Did I mischaracterize your testimony in
21 any way?
22 **A Can you restate the question?**

175

1 Q Okay. Did you during the break contact
2 Mr. Bair to ask him whether anyone at the State
3 Department informed the Department of Justice
4 attorneys about the return of Secretary Clinton's
5 e-mails in 2014?
6 **A No.**
7 MR. GARDNER: To be sure, that's a
8 different question than what you just asked.
9 **A No, I did not call him.**
10 Q Why didn't you call Mr. Bair?
11 **A I was able, in discussing it with the**
12 **attorneys, they were in the room when we were**
13 **talking with -- when I was speaking with Mr. Bair.**
14 Q So your testimony is that your test --
15 your attorneys are the ones who told you that --
16 that you had asked Mr. Bair whether he informed
17 Department of Justice attorneys about the return
18 of Secretary Clinton?
19 **A Yes.**
20 Q Does the State Department agree that
21 Secretary Clinton's e-mails are relevant to
22 plaintiff's FOIA request in this case?

176

1 MR. GARDNER: Objection. Form.
2 **A So I believe when we searched Secretary**
3 **Clinton's e-mails, they did not find any**
4 **additional responsive documents.**
5 Q Okay. So my question is slightly
6 different.
7 Does the State Department agree that
8 Secretary Clinton is a custodian whose e-mails may
9 be potentially responsive to plaintiff's FOIA
10 request in this case?
11 MR. GARDNER: Objection. Calls for a
12 legal conclusion.
13 MS. COTCA: Are you instructing her not
14 to answer?
15 MR. GARDNER: No.
16 MS. COTCA: Okay.
17 MR. GARDNER: I'm objecting that it calls
18 for a legal conclusion.
19 **A Can you restate the question?**
20 Q Does the State Department agree that
21 Secretary Clinton's e-mails are relevant to
22 plaintiff's FOIA request that it submitted in this

177

1 case for records from the Secretary -- from
2 Secretary Clinton's office about the talking
3 points that were provided to Ambassador Susan Rice
4 following the September 11, 2012, attacks in
5 Benghazi?
6 MR. GARDNER: Objection. Form.
7 **A So I'm not sure what you mean by**
8 **"relevant," because at the time that we were**
9 **responding to the FOIA requests we didn't know --**
10 **originally we didn't know the extent that she was**
11 **using e-mails. And when we didn't -- once the**
12 **documents were returned, we didn't know what was**
13 **in them.**
14 Q Okay. So my question is, sitting here
15 today, does the State Department agree that
16 Secretary Clinton's e-mails are relevant to
17 plaintiff's FOIA request that it submitted in this
18 case to Secretary Clinton's office for records of
19 communication about the talking points that were
20 provided to Ambassador Susan Rice following the
21 September 11, 2012, attacks in Benghazi?
22 MR. GARDNER: Objection. Form.

178

1 **A So if you're asking me if today we got**
2 **the same FOIA requests, then, yes, we would search**
3 **those records.**
4 Q And by "those records" you're referring
5 to e-mails from Secretary Clinton. Correct?
6 **A Correct.**
7 Q Okay. Is the State -- does the State
8 Department agree that Secretary Clinton was an
9 individual in the Secretary's office who would
10 have been involved or would have had relevant
11 knowledge with regard to the talking points that
12 were provided to Ambassador Susan Rice?
13 MR. GARDNER: Objection. Form.
14 **A I didn't see anything that demonstrated**
15 **that Secretary Clinton herself until later, after**
16 **Susan Rice used the talking points, that she**
17 **looked at them.**
18 Q So when -- if the State Department agrees
19 as of today, in June 2019, that Secretary
20 Clinton's e-mails are relevant to the FOIA request
21 submitted in this case, why did the State
22 Department not inform the plaintiff, Judicial

179

1 Watch, at any point during the summer of 2014 that
2 the State Department was aware there was an issue
3 with Secretary Clinton's e-mails?
4 MR. GARDNER: Objection. Asked and
5 answered.
6 You can answer again.
7 **A Because our understanding today is**
8 **different than our understanding was when we were**
9 **working on your FOIA request.**
10 Q State Department produced Secretary --
11 e-mails from Secretary Clinton regarding Benghazi
12 in August of 2014 to the Hill, did it not?
13 **A I believe that there were some e-mails.**
14 Q Okay. Did the State Department review
15 and search those e-mails to determine whether
16 those were responsive to plaintiff's FOIA request
17 in August of 2014 or any point thereafter up
18 through December 31, 2014?
19 MR. GARDNER: Objection. Form.
20 **A Can you restate the question?**
21 MR. GARDNER: There were about three
22 questions in there, I think that's the problem.

180

1 MS. COTCA: There actually aren't,
2 but ...
3 Q The -- did the State Department review,
4 for purposes of responding to plaintiff's FOIA
5 request in this case, the e-mails that the State
6 Department produced to the Hill about the -- about
7 Benghazi in 2014?
8 **A I'm not sure.**
9 Q Why not?
10 **A So when IPS received your FOIA request,**
11 **it searched -- it tasked the Office of the**
12 **Secretary. And they performed the FOIA search**
13 **that they would normally -- or the search that**
14 **they would normally perform for a FOIA, which is,**
15 **I think, different than for a congressional**
16 **document request.**
17 **At the time they were searching STARS,**
18 **STePs, CARS, and the Top Secret documents index.**
19 Q Okay. Do you agree that the e-mails from
20 Secretary Clinton that the State Department
21 produced to the Hill on August 11, 2014, were
22 potentially responsive to plaintiff's FOIA request

Conducted on June 19, 2019

181

1 in this case?

2 **A I don't know.**

3 Q Are you aware what the FOIA request in

4 this case is about?

5 **A Yes.**

6 Q Okay. So let's take it step by step.

7 What is the FOIA request in this case

8 for?

9 **A So it was for records from the Office of**

10 **the Secretary having to do with the formulation of**

11 **the talking points that Secretary Rice used.**

12 Q Okay.

13 **A The congressional document request had to**

14 **do more broadly with Benghazi and what happened**

15 **that night, and encompassed topics far broader**

16 **than just the talking points.**

17 Q Okay. But I want to focus again, let's

18 just focus on plaintiff's FOIA request in this

19 case.

20 You identified that the plaintiff's FOIA

21 request was submitted to the Secretary's office.

22 Are you aware that it was submitted for

182

1 communications from the Secretary's office about

2 the Benghazi talking points?

3 **A Yes.**

4 Q Okay. Was Secretary Clinton in the

5 Secretary's office for the time frame that is

6 relevant to Judicial Watch's FOIA request?

7 **A Yes.**

8 Q Okay. So do you agree, does the State

9 Department agree that if there were any e-mails

10 from Secretary Clinton relating to Benghazi, that

11 those were potentially responsive to plaintiff's

12 FOIA request?

13 **A But the people who are processing the**

14 **FOIA requests didn't have an understanding that**

15 **Secretary Clinton had an e-mail account.**

16 Q Okay. So my question is the State

17 Department -- the State Department was aware in

18 August of 2014 that Secretary Clinton had e-mails

19 relating to Benghazi and produced those e-mails,

20 or at least some of those e-mails, to the Hill.

21 Correct?

22 **A Correct.**

183

1 Q Okay. And at the same time, in August of

2 2014, the State Department was aware that there

3 was an issue with Secretary Clinton's e-mail use

4 while she was at the State Department.

5 Is that correct?

6 **A There was an uneven understanding, and I**

7 **think different officials knew different things.**

8 **But there was a growing sense that she had used**

9 **e-mails.**

10 Q Rather than engaging with Judicial Watch

11 in this case from the time that the State

12 Department knew there were issues with Secretary

13 Clinton's e-mails in the summer of 2014 through

14 December 31, 2014, wouldn't it have been more

15 transparent and just honest for the State

16 Department to disclose the fact that there are

17 these potentially responsive records that the

18 State Department would like to have an opportunity

19 to review in response to plaintiff's FOIA request?

20 **A The department gets a lot of FOIA**

21 **requests that are all going on at the same time.**

22 **It deals with them on a first-in/first-out basis.**

184

1 **It tries to find the responsive records that it**

2 **can, and to provide those.**

3 **The understanding might be imperfect, but**

4 **it does the best that it can with the knowledge it**

5 **has at the time.**

6 Q Okay. So in December of 2014, December

7 6, 2014, through December 31, 2014, the State

8 Department was aware that Secretary Clinton

9 returned 12 banker boxes of her e-mails. Correct?

10 **A Correct.**

11 Q So rather -- my question is, rather than

12 engaging with the plaintiff during this time frame

13 to settle this case, wouldn't it have been more

14 honest for the State Department to relay this

15 information to the plaintiff and ask that it be

16 permitted to have more time to be able to search

17 these records in response to plaintiff's FOIA

18 request?

19 **A During that time frame the department had**

20 **the boxes, but it didn't know what was in them.**

21 **It didn't know if there were personal records in**

22 **them. They didn't know at that time even if they**

185

1 were Department of State records.
2 So for a FOIA request, all we can do is
3 search the records that we have, and that are
4 actually State Department records. And at that
5 time we didn't know yet if those 12 banker boxes
6 had any Department of State records in them.
7 Q So your answer actually begs the
8 question, why didn't at that point then the State
9 Department ask the plaintiff, Let's put the case
10 on hold for a brief period of time until the State
11 Department has a chance to review the e-mails that
12 Secretary Clinton returned to the State Department
13 and determine whether those records were federal
14 records and pertain to her work while she was at
15 the State Department, and whether any of those
16 e-mails were relevant and responsive to
17 plaintiff's FOIA request?
18 A We can't stop processing FOIA requests.
19 So we need to continue on. And at that time we
20 didn't know what was in those records, what was in
21 those boxes, if they were State Department
22 records, personal records, or a mix, or anything

186

1 else.
2 Q Did State Department try to avoid public
3 disclosure of the fact that it had a problem with
4 Secretary Clinton's e-mails in 2014?
5 A No.
6 Q I think you testified earlier that a
7 search for congressional record is different from
8 a search from FOIA.
9 What -- how -- how were the two searches
10 different?
11 A Different offices are tasked, different
12 people perform the searches, or are in charge of
13 the searches.
14 Q Oh, okay. But in this case Mr. Bair was
15 involved with respect to the search and production
16 to the Hill, as well as the State Department's
17 response to plaintiff. Correct?
18 A That's my understanding, yes.
19 Q So it's the same individual who's
20 involved in both. Correct?
21 A Yes. Sometimes; not always.
22 Q In this particular case.

187

1 A Yes, he was involved with both.
2 Q Moving forward to after December 31,
3 2014. The State Department received e-mails from
4 other senior staff from Secretary Clinton,
5 including Huma Abedin, Cheryl Mills, Jacob
6 Sullivan, and Philip Reines. Is that correct?
7 A That's correct.
8 Q Okay. Did the search -- did the State
9 Department search part of those productions in
10 response to plaintiff's FOIA request?
11 A Yes.
12 Q When was -- when were those searches
13 conducted?
14 A They were conducted between June 26 and
15 July 6 in 2015.
16 Q Okay. And what are you looking at to
17 answer that question?
18 A It's Exhibit 2.
19 Q And what page of Exhibit 2 are you
20 referring to?
21 A Page 7.
22 Q Okay. Did -- after that search was

188

1 conducted, did the State Department receive any
2 additional records from Ms. Mills, Huma Abedin,
3 Jacob Sullivan, or Philip Reines?
4 A Yes, I believe it did.
5 Q Okay. And did the State Department
6 search the records, the remaining records that it
7 received from these individuals, in response to
8 plaintiff's FOIA request?
9 A I don't believe it has yet.
10 Q Why not?
11 A I believe we've offered to search them.
12 Q And what do you base that on?
13 A On discussion with lawyers.
14 Q With which lawyers?
15 A I believe it was Lizzy and Mike.
16 Q And those are lawyer -- can you --
17 A I'm sorry. Lizzy Grosso and Michael
18 Lieberman from the Department of State.
19 Q And when do you believe that the State
20 Department offered plaintiff to finish searching
21 those records in response to this plaintiff -- in
22 response to plaintiff's FOIA request?

189

1 A I'm not sure.
2 Q Did Mr. Bair inform DOJ attorney Robert
3 Prince between August 2014 through December 31,
4 2014, that records were produced to Congress that
5 weren't produced in this case?
6 A I don't think the department knows the
7 answer to that. Mr. Bair said he doesn't really
8 have a recollection of this particular FOIA case.
9 Q Well, isn't that relevant information for
10 your testimony here today?
11 MR. GARDNER: Objection. Argumentative.
12 A But if Mr. Bair doesn't recall, then I
13 don't have anything to base that on.
14 Q Did you review all of the e-mails between
15 Mr. Bair and Mr. Prince from August 2014 through
16 December 31, 2014, to determine whether there was
17 such communication between the two?
18 A I reviewed some of their e-mails. I
19 don't know if I reviewed all of their e-mails.
20 Q Did you request for all of the e-mails
21 between Mr. Bair and Mr. Prince on this topic in
22 preparing for your deposition here today?

190

1 A No.
2 Q Isn't that information -- wouldn't that
3 information be relevant for your testimony about
4 Topic Number 1 --
5 MR. GARDNER: Objection. Lack of
6 foundation.
7 Q -- in Exhibit 1?
8 A I'm sorry. Can you state the question
9 again?
10 Q Isn't that information relevant to your
11 testimony here today about the process -- State
12 Department's processing and how it responded to
13 plaintiff's FOIA request in this case?
14 A But I spoke to Mr. Bair, and he didn't
15 recall.
16 Q Okay. But I'm asking with respect to
17 communications between Mr. Bair and Mr. Prince
18 from the DOJ. If those e-mail communications, do
19 you agree that -- does the State Department agree
20 that those records are relevant with respect to
21 the State Department's processing and responding
22 to plaintiff's FOIA request in this case?

191

1 MR. GARDNER: Objection. Lack of
2 foundation.
3 A I'm not sure.
4 Q Okay. And the copies of the e-mails that
5 you reviewed between Mr. Bair and Mr. Prince, were
6 all of those e-mails -- did all of those e-mails
7 include redactions?
8 A I don't know. We can look in the binder.
9 Q Are all of the e-mails that you reviewed
10 between Mr. Bair and Mr. Prince contained in the
11 binders that were marked as exhibits in this case?
12 A Yes.
13 Q Okay. And for e-mails that do include
14 redactions, did you request to see unredacted form
15 to be able to gather the knowledge relevant here
16 today with respect to how the State Department
17 processed and responded to plaintiff's FOIA
18 request?
19 MR. GARDNER: Objection. Lack of
20 foundation.
21 A No.
22 Q Can I point you to Exhibit 3.

192

1 The fourth bullet point down on Page 3 of
2 Exhibit 3.
3 It says -- is it true that Mr. Finney
4 invited -- was invited to a meeting arranged by
5 public affairs concerning Clinton's personal use
6 in late August 2014?
7 A I don't know if it was Mr. Finney's
8 recollection, but Mr. Hackett seemed to recall
9 that in his deposition.
10 Q Was Mr. Finney invited to a meeting
11 arranged by public affairs concerning Clinton's
12 personal e-mail use in late August 2014?
13 A So I don't think Mr. Finney recalls, but
14 that is what Mr. Hackett said in his deposition.
15 Q Then there's a notation, "timing
16 confirmed through e-mail."
17 Do you see that, in the same bullet
18 point?
19 A Uh-huh.
20 Q What's the e-mail that you're referring
21 to there?
22 A I'm not sure.

Conducted on June 19, 2019

193

1 Q Did you prepare this document?
 2 A **I asked the lawyers to prepare it for me.**
 3 **And I'm not sure what that refers -- which e-mails**
 4 **those refer to.**
 5 Q So this document was prepared by your
 6 attorneys representing you here today?
 7 A **At my -- at my direction.**
 8 Q What do you mean by at your direction?
 9 A **I asked them to prepare -- help me**
 10 **prepare chronologies of the various things that**
 11 **were going on with relation to the FOIA request**
 12 **and use of -- Hillary Clinton's use of e-mail.**
 13 Q Okay. So in preparing Exhibit 3, what
 14 exactly did you do to assist in the preparation of
 15 this document?
 16 A **I asked them to summarize some of the**
 17 **declarations and to put in references to where we**
 18 **had certain understandings of various things, and**
 19 **what people recalled or had said in their**
 20 **testimony about this topic.**
 21 Q Okay. So other than making the request
 22 of your attorneys to create -- or to summarize the

194

1 information contained in Exhibit 3, what else did
 2 you do to help prepare this document?
 3 A **That's it.**
 4 Q Did you confirm with them -- and by
 5 "them" I mean your attorneys representing you here
 6 today -- that -- well, I'm sorry. Let me
 7 withdraw.
 8 Let me ask you: The e-mail referenced in
 9 this bullet point, do you know if that e-mail has
 10 been produced to Judicial Watch in this case?
 11 A **I don't know. I would have to check.**
 12 Q Okay. How long will that take you?
 13 A **We can take a break and I can look**
 14 **through the binders and consult with the**
 15 **attorneys.**
 16 Q Well, I -- I just want to ask you as to
 17 what your testimony -- without speaking with your
 18 attorneys and providing what they provide to you
 19 about this question, I want to ask what do you
 20 know on behalf of the State Department with
 21 respect to the e-mail referenced in this bullet
 22 point and whether it was produced in this case?

195

1 A **Since I'm not certain which e-mail it's**
 2 **referring to, I don't know whether or not it was**
 3 **produced. So I need to refresh my memory on which**
 4 **e-mail we're talking about.**
 5 Q Do you know if -- do you know the timing
 6 that was confirmed in the e-mail referenced in the
 7 fourth bullet point of this document?
 8 A **It was the late August 2014 timing.**
 9 Q So is it your testimony that there is an
 10 August 2014 e-mail confirming the meeting arranged
 11 by public affairs?
 12 A **I'm sorry. Say that again?**
 13 Q Is it your testimony that in late August
 14 2014 there was an e-mail confirming the time of
 15 the meeting arranged by public affairs regarding
 16 Clinton's personal e-mail use?
 17 A **I don't recall specifically what that**
 18 **e-mail says, so I would have to look it up.**
 19 Q How do you know that -- are you relying
 20 on Exhibit 3 for your testimony here today?
 21 A **I'm relying on all of the exhibits, as**
 22 **well as the material in the binders.**

196

1 Q Okay. So specific to Exhibit 3, you're
 2 relying on the information contained in Exhibit 3
 3 to testify here today. Is that right?
 4 A **Yes.**
 5 Q Okay. How do you know that this
 6 information is accurate?
 7 A **Well, I did review the documents in the**
 8 **binder -- in the binders. I just don't recall**
 9 **specifically that e-mail, which e-mail it's**
 10 **referring to.**
 11 Q When did you receive a copy of the
 12 documents that have been marked as Exhibit 2
 13 through Exhibit 7?
 14 A **So I received them at different points**
 15 **during our preparation. And we went back and**
 16 **forth several times in developing the different**
 17 **exhibits.**
 18 Q So with respect to Exhibit 3, when did
 19 you first receive a copy of this document?
 20 A **Sometime probably within the last week or**
 21 **two.**
 22 Q Okay. And did you do anything to confirm

197

1 or to verify that the information is accurate
2 that's contained in Exhibit 3?
3 **A I'm not sure I understand the question.**
4 **But I did review the materials in the binder in**
5 **conjunction with the chronologies that were**
6 **prepared.**
7 Q Okay. So let me try to rephrase it, if
8 you don't understand the question.
9 But I'm trying to understand whether,
10 when you received Exhibit 3 from your attorneys
11 one to two weeks ago, did you do anything since
12 then to verify that the information contained in
13 Exhibit 3 is true and accurate?
14 MR. GARDNER: Objection. Asked and
15 answered.
16 **A I reviewed -- I had over time -- over**
17 **those several weeks in preparing for this**
18 **testimony, reviewed the information in the binder.**
19 **I didn't -- while I didn't go back and**
20 **confirm that every single reference in here was in**
21 **the binder, I mean, generally it looked correct to**
22 **me.**

198

1 Q And you agree that this information is
2 relevant to your testimony here today. Correct?
3 MR. GARDNER: Objection. Form.
4 **A Yes.**
5 Q Okay.
6 (Pitterle Deposition Exhibit 14 marked
7 for identification, retained by counsel.)
8 Q You've been shown what has been marked as
9 Exhibit 14 in this case.
10 Do you recognize this document?
11 **A Yes.**
12 Q You reviewed this document before your
13 deposition today?
14 **A Yes.**
15 Q And just for the record, to make sure we
16 have a clear record, the document is identified at
17 the top as Document Number C05831334.
18 Is that accurate?
19 **A Yes.**
20 Q Okay. When did you review this document?
21 **A Sometime within the last three weeks.**
22 Q Okay. And what is this document?

199

1 **A It looks like it's an e-mail from Cheryl**
2 **Mills to Jake Sullivan and Philip Reines.**
3 Q That's part of an e-mail chain?
4 **A Yes.**
5 Q Okay. And the e-mail chain also includes
6 an e-mail from Jacob Sullivan to Secretary
7 Clinton, to her hdr22@clintonemail.com e-mail
8 address, with a copy to Cheryl D. Mills.
9 Is that correct?
10 **A Yes.**
11 Q Okay. And what is the date of the
12 e-mail?
13 **A September 29, 2012.**
14 Q Okay. And that's actually for both
15 e-mails. Correct?
16 **A Yes.**
17 Q Okay. And was this document produced to
18 plaintiff in this case?
19 **A Yes.**
20 Q Okay. And when was it produced?
21 THE WITNESS: Do we have the -- the two
22 letters -- the response letter?

200

1 MR. GARDNER: The response letter?
2 THE WITNESS: Yeah.
3 MR. GARDNER: Sure.
4 That was going to be, yeah, Binder 3.
5 And it's 14 and 15.
6 **A So I believe it was provided on April 18,**
7 **2016.**
8 Q First of all, on Page 3 of the document,
9 that's been marked as Exhibit 14 -- and I'm sorry,
10 for the record, what exhibit and what tab were you
11 referring to when you answered the last question?
12 **A Exhibit 10, Tab 14.**
13 Q Thank you.
14 Okay. So now moving -- looking at
15 Exhibit 14, the last page, the third page of this
16 document where it says, Page Denied, what does
17 that mean?
18 **A It means that the material is not going**
19 **to be released under FOIA.**
20 Q What does the page contain, is it a
21 separate -- is it another e-mail?
22 MR. GARDNER: Objection. Form.

Conducted on June 19, 2019

201	1 Q Or do you know as to, like, what type of 2 document this third page of this exhibit is? 3 MR. GARDNER: Objection. Beyond the 4 scope of the Rule 30(b)(6) deposition. 5 MS. COTCA: The 30(b)(6) deposition 6 notice identifies the State Department's response 7 and processing of this FOIA request. 8 MR. GARDNER: Just -- 9 MS. COTCA: And I'm asking only specific 10 with respect to what's been produced in this case. 11 MR. GARDNER: No. I understand. And 12 Judge Lamberth's order says that that topic is 13 limited by the third of the three subtopics, which 14 is the reasonableness of the search. 15 Asking about what is behind this 16 redaction and what this redaction means has 17 nothing to do with that topic. 18 If you can articulate for me how it does, 19 I'm happy to consider it. 20 MS. COTCA: If the State -- I'll say 21 exactly how. 22 If the State Department located this	203	1 Secretary Clinton at her hdr22@clintonemail.com. 2 Do you see that? 3 A Yes. 4 Q Okay. And do you agree that this e-mail 5 was sent from Mr. Sullivan to Secretary Clinton 6 and Cheryl Mills to her state.gov e-mail account 7 back in September of 2012? 8 MR. GARDNER: Objection. Compound. 9 Q You may answer. 10 A Oh. Can you restate the question? 11 Q Do you agree that this e-mail was sent 12 from Mr. Sullivan to Secretary Clinton and Cheryl 13 Mills, to Cheryl Mills' state.gov e-mail account, 14 back in September of 2012? 15 A I don't know if that's -- I'm assuming 16 that's Cheryl Mills' e-mail account. But I'm not 17 sure. 18 Q Okay. So why don't -- 19 A It just has -- 20 Q So sorry. I didn't mean to speak over 21 you. What was the last part of your answer? 22 A It just has her name. It doesn't --
202	1 document in its September 2014 searches, then it's 2 highly relevant to the topics that Judge Lamberth 3 identified in his discovery order. 4 MR. GARDNER: No. I disagree. It's 5 beyond the scope. 6 I mean, she can answer it. I'm not 7 instructing her not to answer. It's just beyond 8 the scope. 9 MS. COTCA: Okay. 10 A Can you restate the question? 11 Q Do you know the type of document that is 12 contained in the third page of Exhibit 14 -- 13 A No. 14 Q -- whether it's an e-mail or anything 15 else? 16 A No, I don't. 17 Q Did you review this document in 18 unredacted form in preparation for your testimony 19 here today? 20 A No, I did not. 21 Q I'll point you to the second page of 22 Exhibit 14. An e-mail chain from Mr. Sullivan to	204	1 there's no extension identified with the e-mail 2 address. 3 Q Okay. So why don't you take a look at 4 the bottom of the first page of Exhibit 14. Where 5 it says, on Sat, for Saturday, September 29, 2012, 6 at 11:49 a.m., Cheryl Mills, and it includes her 7 e-mail address, wrote. 8 Do you see that? 9 A Yes. 10 Q Okay. Is that -- was that Cheryl Mills' 11 e-mail address from the State Department, that was 12 issued to her by the State Department, while she 13 was at the State Department? 14 A Yes, it is. 15 Q Did the e-mail with Ms. Mills to her 16 State Department e-mail account show up as part of 17 the search results in September of 2014 in this 18 case? 19 A I'm sorry, say that again? 20 Q Did the e-mail from Ms. Mills' state.gov 21 e-mail account show up as part of the search 22 results that came about as a result of the

205

1 searches done in September 2014?
2 **A I think the department's not sure,**
3 **because Jonathon Wasser did search the PSTs that**
4 **included the PST for Cheryl Mills' e-mail, but**
5 **it's unclear if the documents came from those PST**
6 **searches or when they did the cross-reference to**
7 **the search that was done in -- for the USUN**
8 **document search.**
9 Q Do you remember -- do you know if -- did
10 the State Department have this document as two
11 separate documents at some point in 2014 or 2015?
12 MR. GARDNER: Objection. Form.
13 **A I'm not sure what you mean by "two**
14 **separate documents."**
15 Q Meaning one of the e-mails was one
16 document and the e-mail contained on Page 2 was a
17 separate document?
18 **A I don't think the State -- I don't know.**
19 Q Okay.
20 **A Because I don't know what that last page**
21 **is.**
22 Q Do you know whether Pages 1 and Pages 2

206

1 at any point, whether the State Department had
2 them as two separate documents?
3 **A I don't know.**
4 Q And just to be clear, Secretary Clinton's
5 e-mail address that is contained on Page 2 of
6 Exhibit 14, that is the e-mail address that she
7 used while she was at the State Department?
8 **A That's my understanding.**
9 Q Okay. And which e-mail was -- did the
10 State Department initially deem nonresponsive that
11 are contained in Exhibit 14?
12 **A I'm not sure. I would have to look that**
13 **up.**
14 Q Where would you look that up?
15 **A I'd want to take a look through the**
16 **binders, and then my other exhibits.**
17 Q And I'm sorry, I can't hear.
18 **A And in the other exhibits.**
19 MR. GARDNER: I'll represent to you it's
20 in Exhibit 2, Page 6, answers your question.
21 **A So, yes, I believe this is the document,**
22 **the e-mail chain that initially was deemed not**

207

1 **responsive because it didn't directly mention**
2 **Secretary Rice -- Ambassador Rice's talking**
3 **points. But later, after they had searched**
4 **through the documents that Mr. Sullivan returned,**
5 **then they did find out that further on down in the**
6 **e-mail chain it referenced the talking points for**
7 **Secretary Rice.**
8 **So then the entire e-mail chain was**
9 **deemed potentially responsive.**
10 MR. GARDNER: I think you mean Ambassador
11 Rice?
12 **A Ambassador Rice, sorry.**
13 Q So my question is, which document from
14 exhibit -- or which e-mail from Exhibit 14 was
15 initially deemed unresponsive by the State
16 Department?
17 **A So I believe it was the first two pages.**
18 Q First two pages?
19 **A I believe that's correct.**
20 Q And that would include the e-mail that
21 was sent to Secretary Clinton, which would have
22 disclosed Secretary Clinton's e-mail address, had

208

1 it been produced to Judicial Watch in November of
2 2014. Correct?
3 **A Correct.**
4 Q I'm sorry?
5 **A Correct.**
6 Q Okay. Thank you.
7 I want to move on, actually, to a
8 different topic. I'm going to move to the topics
9 concerning the preparation and dissemination of
10 the Benghazi talking points.
11 MS. COTCA: Can we have just a minute for
12 me to -- can we go off the record for a minute.
13 MR. GARDNER: Yeah.
14 VIDEO SPECIALIST: We are going off the
15 record at 16:19.
16 (A recess was taken.)
17 VIDEO SPECIALIST: We are back on the
18 record at 16:29.
19 BY MS. COTCA:
20 Q We're going -- as I mentioned before the
21 break, we're going to move on to the topics of
22 Benghazi.

209

1 The State Department issued Secretary
2 Clinton's statement about the attacks on Benghazi
3 on September 11, 2012?
4 **A I'm sorry, say that again?**
5 Q Did the State Department issue Secretary
6 Clinton's public statement about the attacks on
7 Benghazi in September 2012?
8 **A Yeah, I don't remember if it was right on**
9 **September 11 or on September 12.**
10 Q Okay. Did the State Department issue
11 Secretary Clinton's statement about the attacks in
12 Benghazi at approximately 10 o'clock p.m. on
13 September 11, 2012?
14 **A I'm not sure of what the timing.**
15 Q Did you review the State Department's --
16 or Secretary Clinton's statement that she issued
17 about the attacks in Benghazi on September -- on
18 September 11, 2012?
19 **A No, I did not.**
20 Q Why not?
21 **A I just didn't think of it.**
22 Q Isn't that information relevant to your

210

1 testimony here today with respect to the topics
2 identified in Exhibit 1 pertaining to the Benghazi
3 attacks and the talking points?
4 MR. GARDNER: Objection. Form.
5 **A I was more focused on the talking points**
6 **that Ambassador Rice used.**
7 Q I point you to Topic Number 10 of Exhibit
8 1. "The department's evolving understanding of
9 the Benghazi attack."
10 Do you see that?
11 **A Yes.**
12 Q Okay. Are you -- did you prepare to
13 testify about the State Department's evolving
14 understanding of the Benghazi attacks for your
15 deposition here today?
16 **A Just at a high level.**
17 Q And what does "high level" mean?
18 **A Well, it's a very complex topic. And**
19 **aftermath is kind of very broad. Or that -- the**
20 **evolving understanding of the Benghazi attacks**
21 **stretched out over many months.**
22 Q Okay. Do you agree that Secretary

211

1 Clinton's statement that she issued on the evening
2 of the attacks in Benghazi are relevant to your
3 testimony about the State Department's evolving
4 understanding of the Benghazi attack?
5 MR. GARDNER: Objection. Form.
6 **A There's a lot of information about the**
7 **Benghazi attacks. There are a lot of documents.**
8 **And I just didn't review that one.**
9 Q Okay. My question is, do you agree that
10 Secretary Clinton's statement that she put out
11 publicly on the eve of the Benghazi attacks on
12 September 11, 2012, is relevant to your testimony
13 here today about the State Department's evolving
14 understanding of the Benghazi attack?
15 MR. GARDNER: Objection. Asked and
16 answered. And to form.
17 MS. COTCA: She didn't answer my
18 question.
19 MR. GARDNER: No, she didn't answer the
20 way you like. She did answer.
21 MS. COTCA: No. It was a nonresponsive
22 response.

212

1 MR. GARDNER: No. I disagree.
2 Same objection. Objection, form.
3 **A There are a lot of documents, and a lot**
4 **about Benghazi, and I just did not look at that**
5 **document.**
6 Q I understand you didn't look at it. I'm
7 not contesting whether you looked at it or you
8 didn't. My question is, do you agree that that
9 statement, Secretary Clinton's statement about the
10 Benghazi attack that she issued on September 11,
11 2012, is relevant to your testimony here today
12 about the State Department's evolving
13 understanding of the Benghazi attack?
14 MR. GARDNER: Objection. Form.
15 **A I'm sure there are many things that are**
16 **relevant to what happened in Benghazi, but I**
17 **couldn't look at everything. And it's just not**
18 **something that I looked at.**
19 Q Okay. Is it your position that Secretary
20 Clinton's statement from September 11, 2012, about
21 the attacks in Benghazi, are -- is not relevant to
22 the testimony -- your testimony about the State

213

1 Department's evolving understanding of the
2 Benghazi attack?
3 MR. GARDNER: At this point I am going to
4 object that this is beyond the scope.
5 The court allowed the topics about
6 Benghazi as it relates to the reasonableness of
7 the government's search for responsive documents
8 in this case. That's how we prepared for these
9 topics.
10 The court -- court's order expressly says
11 that, from -- from January 15, 2019.
12 MS. COTCA: Expressly says what?
13 MR. GARDNER: That the Court would permit
14 a 30(b)(6) on the topics of the aftermath of
15 Benghazi and the evolving understanding of
16 Benghazi as that relates to the adequacy of the
17 department's search for responsive records.
18 So your questions now go far beyond that
19 topic. I would refer you to -- specifically to
20 the court's order.
21 MS. COTCA: I believe the issue -- and I
22 believe Judge Lamberth's order speaks to what the

214

1 State Department's understanding was with respect
2 to the Benghazi attack, to understand what did the
3 State Department have to hide.
4 MR. GARDNER: No. That's not right at
5 all.
6 What the court did was it permitted -- it
7 expressly said that you're not a roving IG, and
8 that this topic was relevant as it relates to the
9 reasonableness of the government's search for
10 responsive documents.
11 I -- I can hand you the court's order, if
12 you'd like to see it. But that is beyond the
13 scope, and we would instruct her not to answer
14 that.
15 BY MS. COTCA:
16 Q Secretary Clinton communicate with the
17 Prime Minister of Egypt on September 12, 2012, at
18 approximately 7 o'clock in the evening, informing
19 him that the State Department knows that the
20 attack in Libya had nothing to do with the film,
21 it was a planned attack, not a protest.
22 **A I'm sorry, can you say that again.**

215

1 MR. GARDNER: Is that a question?
2 MS. COTCA: Yes.
3 Q Did the Secretary -- did Secretary
4 Clinton communicate with the Prime Minister of
5 Egypt on September 12, 2012, at approximately 7
6 o'clock in the evening, informing him that the
7 State Department knows that the attack in Libya
8 had nothing to do with the film, that it was a
9 planned attack, not a protest?
10 MR. GARDNER: Yeah, same objection. Same
11 instruction. It's beyond the scope.
12 MS. COTCA: You're informing her not to
13 answer?
14 MR. GARDNER: It's beyond the scope.
15 Yes.
16 Q Isn't it true that Secretary Clinton told
17 Chelsea Clinton that the attacks -- that it wasn't
18 the video that -- I'm sorry. Withdraw that.
19 Isn't it true that Secretary Clinton
20 informed her daughter, Chelsea Clinton, on
21 September 11, 2012, that the attacks caused --
22 that the attacks in Benghazi were the result of a

216

1 terrorist group?
2 **A I think she did.**
3 Q Okay. Why did then Ambassador Rice blame
4 the video when she appeared on the Sunday talking
5 shows?
6 MR. GARDNER: Objection, form.
7 Objection, foundation.
8 **A So there was a lot of information, or**
9 **lack of information at that time, both when**
10 **Secretary Clinton was talking to -- or e-mailing**
11 **her daughter, and when Ambassador Rice -- or when**
12 **the talking points were being prepared for**
13 **Ambassador Rice. There was still a lot of**
14 **uncertainty. And that's why there was a**
15 **difference.**
16 Q So between the time that Secretary
17 Clinton informed Chelsea Clinton that the attacks
18 in Benghazi were the result of a terrorist group
19 and Sunday, when Ambassador Rice appeared on the
20 Sunday morning talk shows, was -- did the State
21 Department receive intelligence to contradict her
22 statement, the statements that Secretary Clinton

217

1 made to Chelsea Clinton on September 11, 2012?
2 **A I don't know specifically what the State**
3 **Department received. But there was a lot of**
4 **information coming in. And I don't think that we**
5 **can take what Secretary Clinton said initially to**
6 **her daughter as fact, and then what -- later when**
7 **Ambassador Rice said, because everything was still**
8 **evolving.**
9 **So at that point I would say that neither**
10 **one of them had perfect information about what**
11 **happened that night in Benghazi.**
12 Q Okay. So when Secretary Clinton e-mailed
13 Chelsea Clinton letting her know that there was an
14 attack in Benghazi by a terrorist group, was it
15 the State Department -- the State Department's
16 understanding that the Benghazi attacks were a
17 result of a terrorist group?
18 **A That was Secretary Clinton's**
19 **understanding at the time that she wrote the**
20 **e-mail.**
21 **I don't know what other people in the**
22 **State Department understood at that point, because**

218

1 **information was still coming in.**
2 Q So my question is with respect -- within
3 your capacity as the corporate designee of the
4 State Department, as to whether the State
5 Department's understanding of the Benghazi attacks
6 was consistent with Secretary Clinton's e-mail to
7 Chelsea Clinton on September 11, 2012?
8 **A The State Department is a large entity,**
9 **and there are people on diplomatic security and**
10 **people who were there from the State Department**
11 **the night that it happened. And so different**
12 **people had different understandings of what was**
13 **going on.**
14 **So I don't think that there was one view**
15 **that everybody had. There was no consensus at**
16 **that point that -- of what exactly had happened.**
17 Q What did the State Department know on
18 September 11, 2012, with respect to the terrorist
19 group that attacked the U.S. compound in Libya, in
20 Benghazi?
21 **A So I think that night we didn't know for**
22 **certain that it was a terrorist attack, and we**

219

1 **didn't know which particular groups were involved.**
2 Q With respect to Secretary Clinton's
3 communication with Prime Minister of Egypt Qandil
4 and the communication they had on September 12,
5 2012, did Secretary Clinton have the most
6 up-to-date information about the attacks in
7 Benghazi when she spoke with the Prime Minister?
8 MR. GARDNER: Objection. Beyond the
9 scope of the Rule 30(b)(6).
10 If you can articulate for me how this
11 possibly fits within the topics and the three
12 areas, or the two areas that the court's permitted
13 this testimony, I'm happy it hear it.
14 MS. COTCA: Again, this goes to the State
15 Department's evolving understanding of the
16 Benghazi attack.
17 MR. GARDNER: No, I get that. And then
18 how does it fit within the reasonableness of the
19 State Department's search for responsive records,
20 which is the basis for the court permitting this
21 topic?
22 MS. COTCA: Are you instructing her not

220

1 to answer?
2 MR. GARDNER: I am asking you to explain
3 to me how this is possibly relevant to the topic
4 and subtopic that the court has ordered discovery.
5 And if you can't, then, yes, I will instruct her
6 not to answer.
7 BY MS. COTCA:
8 Q When did the State Department receive
9 plaintiff's --
10 MR. GARDNER: Ramona.
11 MS. COTCA: I'm sorry.
12 Q When did the plain -- when did the State
13 Department receive plaintiff's original notice of
14 deposition, 30(b)(6) deposition notice?
15 MR. GARDNER: You're asking the designee?
16 MS. COTCA: Yes, the designee.
17 **A Oh.**
18 MR. GARDNER: That's the second amended
19 one. It's 14. Sorry. Fourteen of Binder 6.
20 **A Is it the date June 11, 2019? Or is it**
21 **this date?**
22 MR. GARDNER: That date.

221

1 **A February 20th, 2019.**
2 Q Okay. Did the State Department at any
3 point since November of 2019 object to Topic
4 Number 10 identified in Plaintiff's Exhibit 1?
5 MR. GARDNER: I'm not objecting now. I
6 am saying, she can testify absolutely consistent
7 with the scope of the court's order.
8 MS. COTCA: Okay.
9 MR. GARDNER: I've been very transparent
10 about that. We've got documents to provide you,
11 and she's got testimony to give.
12 MR. PRINCE: Also, there seems to be an
13 error in the running transcript. It was recorded
14 as November 20th, and I believe the date -- okay.
15 MR. GARDNER: She's on it.
16 MS. COTCA: So, Josh, I'm looking at the
17 court's discovery order --
18 MR. GARDNER: Yes.
19 MS. COTCA: -- from January 15, 2019, on
20 Page 13.
21 MR. GARDNER: Uh-huh. Uh-huh. Uh-huh.
22 And Page 13 goes with interrogatories.

222

1 MS. COTCA: I'm sorry. No. I'm sorry.
2 Page 12.
3 MR. GARDNER: Yeah.
4 MS. COTCA: And this is in the section
5 with respect to the 30(b)(6) deposition.
6 MR. GARDNER: Correct.
7 MS. COTCA: And I'm looking at the
8 court's statements.
9 MR. GARDNER: Uh-huh.
10 MS. COTCA: "Yet Rice's talking points
11 and State's understanding of the attack play an
12 unavoidably central role in this case:
13 Information about the points' development and
14 content, as well as their discussion and
15 dissemination before and after Rice's appearances
16 could reveal extant unsearched, relevant records;
17 State's role in the points' content and
18 development could shed light on Clinton's motives
19 for shielding her e-mails from FOIA requesters or
20 on State's reluctance to search her e-mails."
21 MR. GARDNER: Yeah. I completely agree
22 with you. And if you ask questions about the

223

1 talking points and the development of the talking
2 points in relationship to Benghazi, she's happy to
3 answer those questions. That's not what you were
4 asking.
5 MS. COTCA: Well, I disagree with your
6 representation. Because clearly Judge Lamberth's
7 order does not -- in this paragraph does not limit
8 it to just the talking points but, rather, to
9 State Department's understanding of the attack and
10 evolving understanding of the attacks.
11 MR. GARDNER: I completely disagree with
12 you. If you look at the very topic sentence on
13 Page 11, Discovery into the adequacy of the State
14 Department's search.
15 Do you see the heading? And then in the
16 paragraph you were reading, it all revolves around
17 the talking points. And then the part you didn't
18 read, which I'll read is, "The government
19 correctly notes Judicial Watch cannot 'appoint
20 itself as a free-lance Inspector General' into the
21 Obama Administration's response to the Benghazi
22 attack."

224

1 But that's not Judicial Watch does here.
2 "Though Judicial Watch cannot hold a fishing
3 expedition trawling anything and everything
4 concerning the Benghazi attack, Judicial Watch may
5 depose State on these topics to the extent helpful
6 to answer the questions underlying this
7 discovery."
8 That discovery in this topic is the
9 discovery into the adequacy of the State
10 Department's search.
11 This designee is prepared to answer those
12 questions fully.
13 MS. COTCA: Okay. Do you -- and again
14 I -- in the same paragraph that you just read,
15 Judge Lamberth points to the fact, "Did state know
16 Clinton deemed the Benghazi attack terrorism hours
17 after it happened, contradicting the Obama
18 Administration's subsequent claim of a
19 protest-gone-awry? Did the department merely fear
20 what might be found?"
21 And that's the basis that Judge Lamberth
22 granted discovery on this topic, with respect to

Conducted on June 19, 2019

<p style="text-align: right;">225</p> <p>1 the State Department's evolving understanding of 2 the attacks in Benghazi and what the State 3 Department knew prior to disseminating the talking 4 points that were provided to -- and 5 contemporaneous with dissemination of the talking 6 points that were provided to Ambassador Rice for 7 her TV appearances. 8 MR. GARDNER: To the extent that Judicial 9 Watch's questions are tethered to the development 10 of the talking points as it relates to the 11 evolving understanding of Benghazi, the witness is 12 absolutely prepared to answer those questions. 13 But again, Judicial Watch is not a roving 14 inspector general. And broad questions about 15 Benghazi are not within the scope of the court's 16 order. 17 I mean, look. She's here to answer 18 questions. So if you want to proceed, we can 19 proceed. 20 MS. COTCA: You know, for the record, I 21 mean, Judge Lamberth does not limit the subject 22 matter just with respect to the talking points</p>	<p style="text-align: right;">227</p> <p>1 Benghazi attacks? 2 A I focused primarily on the preparation of 3 the talking points, and not Benghazi more broadly. 4 Q Okay. I want to point you to Exhibit 2. 5 Do you have that in front of you? 6 A Yes. 7 Q Okay. And, for the record, what's that 8 exhibit? 9 A It's the Summary of Searches Performed 10 for Documents Responsive to the Talking Point FOIA 11 Request. 12 Q Okay. And who prepared this document? 13 A The lawyers at my direction. 14 Q And which lawyers prepared it? 15 A The team here at the table. 16 Q Okay. And when was this document 17 prepared? 18 A It was prepared over the course of 19 several weeks in preparing for the testimony. 20 Q Okay. And other than making the request 21 of your lawyers to prepare this document, did you 22 have any other role or involvement in the</p>
<p style="text-align: right;">226</p> <p>1 that were provided to Ambassador Rice. 2 So if we need to raise this with Judge 3 Lamberth, we'll raise it. But I don't -- I don't 4 think the limitation is fair based on Judge 5 Lamberth's order from January 15, 2019. 6 MR. GARDNER: We'll just have to disagree 7 on the interpretation. 8 MS. COTCA: Okay. 9 BY MS. COTCA: 10 Q When did the State Department know that 11 the online video wasn't the cause of the Benghazi 12 attacks? 13 A I'm not sure I have a particular date, 14 but it was an evolving understanding. And at some 15 point the department understood that it was a 16 terrorist attack, and that is what the 17 Accountability Review Board also determined. 18 Q In preparation -- in preparing for your 19 testimony here today, did you undertake any 20 efforts to have an understanding of a particular 21 date or time frame when the State Department knew 22 that the online video was not the cause of the</p>	<p style="text-align: right;">228</p> <p>1 preparation of what's been marked as Exhibit 2? 2 A Yes. We went back and forth through 3 several iterations, talking about what to include 4 and what would be helpful for the testimony. 5 Q And was there anything in Exhibit 2 that 6 you requested of your attorneys to include that 7 had previously not been included? 8 A I asked for some clarification on dates. 9 I asked them to include the search terms that were 10 used for the various searches. I asked them to 11 include specific dates. And I asked them to 12 summarize each of the searches that were done. 13 Q And when did you receive this document in 14 its final form? 15 A In its final form? 16 Q Yes. 17 A I received it today. 18 Q Okay. And what did you do, if anything, 19 to ensure that the information contained in 20 Exhibit 2 is accurate? 21 A I looked at it briefly, and it seemed to 22 comport with the information that was contained in</p>

Conducted on June 19, 2019

229

1 the binders that I reviewed.
 2 Q Did you go back and confirm the
 3 information contained in Exhibit 2 with the
 4 documents that are in the binders that have been
 5 marked as an exhibit?
6 A I did not do a specific check of each
7 citation.
 8 Q And you are relying on this -- on the
 9 information contained in this document for your
 10 testimony here today?
11 A Yes.
 12 Q With respect to Exhibit 3.
13 A Yes, I have that.
 14 Q What is that document?
15 A It's Excerpts Concerning Knowledge of
16 E-Mail Use.
 17 Q Okay. And that's a five-page document.
 18 Is that right?
19 A Yes.
 20 Q Okay. And I have the same questions with
 21 respect to this document. Was this prepared by
 22 your attorneys at your direction?

230

1 A Yes.
 2 Q And other than requesting that your
 3 attorneys prepare this document, did you do
 4 anything else with respect to the preparation of
 5 document -- of the document that's been marked as
 6 Exhibit 3?
7 A I asked them to prepare a document that
8 talked about who knew what, when, with regard to
9 the e-mail use, as a memory aid. And we went back
10 and forth again several times about the different
11 things to include. And I asked for dates, that
12 dates be included.
 13 Q And with respect to the information
 14 that's contained in Exhibit 3, how was it decided
 15 as to what information to include in this exhibit?
16 A We talked back and forth about what would
17 be helpful for me during the testimony, so that it
18 would be easy for me to refer to. And so I wanted
19 to have an understanding -- a general
20 understanding of Secretary Clinton, Huma Abedin,
21 Cheryl Mills, Jacob Sullivan, the IT staff, and
22 other people who had worked on the FOIA request at

231

1 issue.
 2 Q Did you make any specific request with
 3 respect to anything contained in this document,
 4 that it be included?
5 A I'm not sure if you're talking about a
6 specific date or specific references.
 7 Q Specific references, or type of
 8 information.
9 A I asked generally for them to summarize
10 who knew what, when, about the e-mail use. And I
11 asked them to please include people who had been
12 on the Secretary's staff, as well as particular
13 the people who had worked on the FOIA request.
 14 Q Anything else?
15 A No. That's it.
 16 Q Okay. And you relied on this document to
 17 testify here today?
18 A Yes.
 19 Q Can we look at Exhibit 4.
 20 So the record is clear, what is this
 21 document?
22 A It's called Timeline: Secretary Clinton

232

1 E-Mail Use.
 2 Q And who prepared this timeline?
3 A The lawyers, at my direction.
 4 Q Okay. And when did you request of your
 5 lawyers to prepare this timeline?
6 A It was probably about two weeks ago.
 7 Q And when did you receive a copy of the
 8 timeline from your attorneys?
9 A It was last week.
 10 Q Okay. And after receiving the timeline,
 11 did you do anything to confirm the accuracy of the
 12 information contained in Exhibit 4?
13 A I looked it over. And it seemed to
14 comport with information that was in the binders
15 that I had reviewed previously.
 16 Q How long did you take to look it over?
17 A I spent several hours looking over all of
18 the documentation, multiple hours looking over the
19 documentation in preparation.
20 I don't know specifically how long I
21 looked at this versus other documents.
 22 Q Okay. And just going back to Exhibit 3.

Conducted on June 19, 2019

233

1 Did you do anything to confirm that the
 2 information contained in Exhibit 3 is accurate
 3 after you received it from your attorneys at the
 4 State Department, and the DOJ?
 5 **A I reviewed it, and it seemed to comport**
 6 **with the information I had reviewed previously.**
 7 Q Did you go back and review the documents
 8 contained in the binders to ensure that the
 9 information is accurate?
 10 **A I did not review every entry.**
 11 Q If you needed or wanted information with
 12 respect to certain individuals, why didn't you
 13 just talk to them?
 14 MR. GARDNER: Objection. Lack of
 15 foundation.
 16 **A Well, I think Clarence Finney -- people**
 17 **like Clarence Finney and Jonathon Wasser had**
 18 **already said that they didn't recall this**
 19 **particular FOIA case. And I had reviewed their**
 20 **depositions and reviewed other documents. And so**
 21 **it didn't seem necessary, other than to -- to**
 22 **Jonathon Wasser, to clarify my understanding of**

234

1 **the Secretariat databases.**
 2 Q Exhibit 5.
 3 For the record, what is this document?
 4 **A Processing of the CREW request.**
 5 Q And who created this document?
 6 **A The lawyers, at my direction.**
 7 Q And when did you request your lawyers to
 8 create this document?
 9 **A Several weeks ago.**
 10 Q And when did they provide to you a copy
 11 of the document?
 12 **A I think it was either last week or the**
 13 **week before.**
 14 Q Okay. And after you received the
 15 document that was created by your attorneys at
 16 your direction, did you do anything to confirm and
 17 verify that the information contained in the
 18 document marked as Exhibit 5 is accurate?
 19 **A I looked it over. And, again, it seemed**
 20 **to comport with my understanding of what was in**
 21 **the binders that I had already reviewed.**
 22 Q Did you review any documents contained in

235

1 the binders when you reviewed this document to
 2 verify the accuracy of the information?
 3 **A I did not specifically look back at any**
 4 **particular documents.**
 5 Q And you're relying on Exhibit 5 for your
 6 testimony here today?
 7 **A Yes.**
 8 Q Okay. I don't know if I asked it about
 9 Exhibit 4. But you're relying on Exhibit 4 for
 10 your testimony here today?
 11 **A Yes.**
 12 Q Okay. Exhibit 6. What is Exhibit 6?
 13 **A Exhibit 6 is called Record Systems in**
 14 **S/ES. And it's a description of the -- the four**
 15 **systems in the Office of the Secretary of State,**
 16 **Executive Secretariat.**
 17 Q And who created this document?
 18 **A The lawyers did, at my specific**
 19 **direction.**
 20 Q And when did you request your lawyers to
 21 create this document?
 22 **A I believe it was last week.**

236

1 Q And when did they create it?
 2 **A Last week.**
 3 Q And when did you receive a copy from your
 4 lawyers?
 5 **A Last week.**
 6 Q And last week, what time, do you
 7 remember, or what day?
 8 **A I don't remember the specific day.**
 9 Q Okay. After you received a copy of the
 10 document from your attorneys, did -- what did you
 11 do to verify the accuracy of the information
 12 contained in Exhibit 6?
 13 **A We called Jonathon Wasser.**
 14 Q And when was that?
 15 **A That was last Friday.**
 16 Q And that's when you had the ten-minute
 17 conversation with him?
 18 **A Yes.**
 19 Q Okay. And what did you discuss with
 20 Mr. Wasser?
 21 **A I asked him if he could clarify the**
 22 **difference between STARS and -- between STePs and**

237

1 **CARS.**
2 Q And is that the only clarification you
3 requested of Mr. Wasser with respect to
4 information contained in Exhibit 6?
5 **A Yes, I believe so.**
6 Q Did you do anything else to verify the
7 accuracy of the rest of the information contained
8 in Exhibit 6?
9 **A No.**
10 Q And you're relying on Exhibit 6 for your
11 testimony here today?
12 **A Yes.**
13 Q If you could look at Exhibit 7, please.
14 Would you identify for the record what it
15 is?
16 **A It's a Timeline of Talking Points**
17 **Request.**
18 Q For the record, this is a five-page
19 document. Is that ...
20 **A Yes.**
21 Q Okay. And who prepared this document?
22 **A The lawyers did, at my direction.**

238

1 Q And when did you request your lawyers to
2 prepare this document?
3 **A It was probably two or three weeks ago.**
4 Q And when did you receive a copy of this
5 document from your lawyers?
6 **A I probably received the first version**
7 **maybe three weeks ago.**
8 Q How many versions of this document did
9 you receive?
10 **A I don't recall. We went back and forth**
11 **several times.**
12 Q And every time that you went back and
13 forth, did you receive a new version?
14 **A Yes.**
15 Q And do you recall what type of
16 information was changed or added as a result of
17 the back-and-forth discussions you had with your
18 attorneys?
19 **A Sometimes it was for a date**
20 **clarification, sometimes it was for an additional**
21 **entry. Sometimes I asked them to move something**
22 **from one timeline to another timeline, just for**

239

1 **ease of reference for myself during the testimony**
2 **today.**
3 **I asked them to sometime -- to provide**
4 **sort of the specific references back to which**
5 **binder and which tab.**
6 Q Did you review any of the documents
7 contained in the binders that have been marked as
8 exhibits at this deposition to verify the accuracy
9 of the information contained in Exhibit 7?
10 **A Well, while I didn't sit down and go**
11 **point-by-point through this, I at numerous times**
12 **during the preparation reviewed the document --**
13 **various documents in the binders at the same time**
14 **we were working on the chronology.**
15 Q When did you receive the final version of
16 this document?
17 **A This morning.**
18 Q When did you receive the most previous
19 version of this document prior to this morning?
20 **A Probably last Friday.**
21 Q Okay. So since last Friday, did you
22 review any of the documents contained in the

240

1 binders that have been marked as exhibits in this
2 deposition to verify the accuracy of the
3 information contained in Exhibit 7?
4 **A I didn't go -- again, I didn't go line by**
5 **line. But yesterday morning I went through the**
6 **timelines again, and I went through various**
7 **documents. I didn't look at every single document**
8 **in the binders again, because it's a lot of**
9 **material. But I basically refreshed my memory on**
10 **the documents in the binders, on the timeline.**
11 Q What information was added in this
12 document when you received it on Friday?
13 **A You mean from today, or do you mean from**
14 **the previous --**
15 MR. GARDNER: I thought you were asking
16 between Friday and the time before that? Maybe --
17 sorry. Reask the question just so we're clear.
18 Q Your testimony is that you received a
19 copy of this document on Friday from your
20 attorneys. Is that correct?
21 **A Yes.**
22 Q Okay. Was any additional -- was there

Conducted on June 19, 2019

<p style="text-align: right;">241</p> <p>1 any information that was added to the document or 2 that was changed from a previous draft? 3 A Yes. It was an updated copy. But I 4 don't recall specifically that time, what the 5 particular changes were. 6 Q Okay. And with respect to the changes 7 that were made on the draft that you received on 8 Friday, did you review the -- any of the documents 9 contained in the binders marked as an exhibit -- 10 as exhibits in this deposition to verify that 11 those changes were accurate? 12 A I did not do a line-by-line check. But I 13 did review various documents in the binders. 14 Q And how about, you said you received the 15 final version this morning? Is that correct? 16 A Yes. 17 Q Okay. Were there any changes or 18 alterations made to Exhibit 7 from the draft that 19 you received on Friday? 20 A I think it was the same version. 21 Q Okay. And are you relying on Exhibit 7 22 for your testimony here today?</p>	<p style="text-align: right;">243</p> <p>1 A Yes. 2 Q Okay. I believe before we broke you were 3 going to see if you could get some information for 4 me. 5 A Oh. I think we were going to try -- I'm 6 sorry, we didn't do that during the break. And 7 now I kind of forget which -- 8 MR. GARDNER: If you tell us, we can take 9 a break and get information for you, assuming it's 10 within the scope. 11 MS. COTCA: Well, it's with respect to 12 the information that's contained in one of the 13 exhibits that she's relying on, relying on for her 14 testimony. 15 MR. GARDNER: Yeah. So -- so just what 16 do you want? Oh, is it Exhibit 3, Page 3, the 17 e-mail? 18 MS. COTCA: Yes. 19 MR. GARDNER: Okay. Was that it? 20 MS. COTCA: I don't know. 21 Q Ms. Pitterle, I believe that you've been 22 taking notes as to what information --</p>
<p style="text-align: right;">242</p> <p>1 A Yes. 2 And I'm sorry, just to clarify, I did see 3 the timelines and the -- reviewed the documents 4 yesterday. 5 Q What timelines and what documents did you 6 review yesterday? 7 A So the exhibits that we have in front of 8 us today, as well as the binders. Not -- I mean, 9 not, again, every single document in the binder. 10 Q How long did you spend reviewing the 11 timelines and the exhibits and the documents that 12 you reviewed yesterday? 13 A It was about three hours. 14 Q And did you do that review by yourself, 15 or was anybody with you during that review? 16 A Several of the attorneys were with me. 17 Q And just is it State Department or DOJ 18 attorneys representing the State Department in 19 this case, or is it other State Department 20 officials who may be attorneys? 21 A No; it was the attorneys here. 22 Q In this case.</p>	<p style="text-align: right;">244</p> <p>1 A I think -- I think that was the only 2 thing I had noted down, Page 3, the e-mail 3 reference in late August 2014. 4 Q And then, I'm sorry, what? 5 A The e-mails that were referred to in the 6 bullet marked in late August 2014. 7 Q Okay. 8 MR. GARDNER: I think we're saying the 9 same thing twice. Right? You're talking about 10 one, two -- fourth bullet point, Page 3, Exhibit 11 3, the reference to timing confirmed through 12 e-mails. Right? 13 MS. COTCA: Yeah, we're talking about the 14 same thing. 15 MR. GARDNER: Yes. Yes, yes. Just 16 making sure. 17 MS. COTCA: Can we take a quick break -- 18 MR. GARDNER: Sure. 19 MS. COTCA: -- so we can obtain that 20 information? 21 MR. GARDNER: We sure can. 22 VIDEO SPECIALIST: We are going off the</p>

245

1 record at 17:09.
2 (A recess was taken.)
3 VIDEO SPECIALIST: We are back on the
4 record at 17:24.
5 BY MS. COTCA:
6 Q Did you have a chance to go back and
7 obtain the information with respect to the e-mail
8 referenced in Exhibit 3?
9 **A Yes. So it's -- it is an e-mail I had**
10 **not seen previously. But I reviewed it now. And**
11 **it's an e-mail string that took place over a**
12 **couple of days in August, late August of 2014,**
13 **where various State Department officials are**
14 **talking about arranging this public affairs**
15 **meeting that John Hackett referenced in his**
16 **deposition.**
17 **And so there is -- there is -- there were**
18 **e-mails that talked about the specific timing of**
19 **that meeting.**
20 Q Okay. And do you have a copy of the
21 e-mail string that you reviewed?
22 **A Yes.**

246

1 MR. GARDNER: We can give you an extra
2 copy if you want one.
3 MS. COTCA: That would be great.
4 MR. GARDNER: Sure.
5 MS. COTCA: And can we mark this as an
6 exhibit? I don't know what number we are on.
7 Exhibit 15, please.
8 MR. GARDNER: Exhibit 15.
9 (Pitterle Deposition Exhibit 15 marked
10 for identification, retained by counsel.)
11 (A discussion was held off the record.)
12 MS. COTCA: And for the record, this is
13 an e-mail dated August -- or it contains an e-mail
14 dated August 27, 2014, from Mr. Finney, regarding
15 meeting with spokesperson's office from 2014.
16 BY MS. COTCA:
17 Q Is that correct?
18 **A Yes.**
19 Q And what was the time that was confirmed
20 for the meeting with the spokesperson's office?
21 **A August 27, 2014, at 3 p.m.**
22 Q That's when the meeting took place?

247

1 **A That's when they were talking about**
2 **having the meeting.**
3 Q I'm sorry?
4 **A I don't know if the meeting actually took**
5 **place, but that is when they -- the e-mail talks**
6 **about having the meeting. And I have no reason to**
7 **think it didn't take place.**
8 Q Sorry, I'm having a hard time hearing
9 you. What was the last part of the answer?
10 **A Sure. So I don't have -- you know, John**
11 **Hackett I guess recalls that he was invited to the**
12 **meeting, but didn't go. And Clarence Finney**
13 **doesn't recall the meeting at all. But there is**
14 **e-mails suggesting that the meeting was arranged.**
15 **But I don't know if it went -- if the meeting**
16 **happened or if it was cancelled at some point.**
17 Q Do you have any reason to believe that
18 the meeting did not take place?
19 **A No.**
20 Q Okay. And who provided you a copy of
21 this document?
22 **A The State Department counsel.**

248

1 Q And who is that?
2 **A Elizabeth Grosso.**
3 Q And those who's representing the State
4 Department -- on behalf of the State Department
5 here at this deposition?
6 **A Yes.**
7 Q Okay. While you were on break, looking
8 over the document marked as Exhibit 15, did you
9 attempt to contact Mr. Finney to confirm whether
10 he recalls this meeting in light of this e-mail
11 that you have just been shown?
12 **A No, I did not.**
13 Q Is Mr. Clarence Finney working today at
14 the State Department?
15 **A I don't know if he's in today.**
16 Q Okay.
17 **A Yes.**
18 Q Let me rephrase my question.
19 MR. GARDNER: I thought you were actually
20 asking if he was in the office today.
21 MS. COTCA: No.
22 Q My question initially, my first question

Conducted on June 19, 2019

249

1 is, he's employed, he's currently employed by the
 2 State Department. Correct?
 3 **A Yes, that's correct.**
 4 Q And he has the same position that he had
 5 back in August of 2014 with the State Department.
 6 Is that right?
 7 **A That's correct.**
 8 Q Okay. And do you know if Mr. Finney is
 9 in the office today?
 10 **A I do not know if he's in the office**
 11 **today.**
 12 Q Did you attempt to contact him to see if
 13 he's in the office today?
 14 **A I did not.**
 15 Q Okay.
 16 **A But --**
 17 Q I'm sorry. Go ahead.
 18 **A But I think it's important to note that**
 19 **Mr. Finney has already said that he doesn't recall**
 20 **the meeting.**
 21 Q Do you know if Mr. Finney reviewed this
 22 document when he testified that he doesn't recall

250

1 this meeting?
 2 **A I don't know.**
 3 Q Okay. Do you know what Mr. Finney had
 4 reviewed to prepare for his testimony that he gave
 5 in this case?
 6 **A I do not.**
 7 Q Okay. Did the State Department produce a
 8 copy of this document in any other FOIA case prior
 9 to today?
 10 MR. GARDNER: Objection. Lack of
 11 foundation.
 12 **A No. Or not that I'm aware of.**
 13 Q Is this document -- has this document
 14 been made publicly available by the State
 15 Department prior to today?
 16 MR. GARDNER: Lack of foundation.
 17 **A No.**
 18 Q Are there other documents that are
 19 referenced in Exhibit 2 through Exhibit 7 that
 20 were relied on that had not been previously made
 21 public, or had not been produced to Judicial Watch
 22 in this case or in any other FOIA case by the

251

1 State Department?
 2 MR. GARDNER: Objection. Form.
 3 **A No.**
 4 Q How do you know that?
 5 **A I believe that everything that -- with**
 6 **the exception of those e-mails, which it just said**
 7 **confirmed through e-mail, it wasn't to a specific**
 8 **e-mail, were depositions and other documents that**
 9 **are publicly available.**
 10 Q Upon receiving a copy of this document
 11 from your attorneys, did you confirm with your
 12 attorneys here today that there aren't any such
 13 documents that had not been previously disclosed
 14 that were relied on in preparing Exhibit 2 through
 15 Exhibit 7?
 16 MR. GARDNER: Objection. Form.
 17 **A I did not specifically ask them.**
 18 Q I want to ask you a few questions in
 19 regards to the CREW FOIA request.
 20 Who is Heather Samuelson?
 21 **A She was the liaison to the White House at**
 22 **the State Department during that time frame.**

252

1 Q Okay. And who did she report to while
 2 she was at the State Department?
 3 **A I don't know. Probably the head of the**
 4 **public affairs office.**
 5 Q How -- on what basis do you say that it
 6 was -- that she reported to the head of the public
 7 affairs office?
 8 **A I believe that the White House Liaison**
 9 **normally sits in that office.**
 10 Q When did you review the records relevant
 11 to the CREW FOIA request for preparing today's
 12 deposition?
 13 **A Over the last couple of weeks.**
 14 Q And Sheryl Walter I believe you
 15 identified before as the director of IPS.
 16 Is that correct?
 17 **A Yes.**
 18 Q Okay. And was she the director of IPS
 19 when the State Department received the CREW
 20 request?
 21 **A I believe she was, but let me confirm**
 22 **that.**

Conducted on June 19, 2019

253

1 She was director of the Office of
 2 Information Programs and Services from December --
 3 December 11 -- or December 2011 through March
 4 2014. So, yes, she would have been the office
 5 director.
 6 Q Okay. And what are you referring to to
 7 answer that question?
 8 A It's Exhibit 3, Page 4.
 9 Q Okay. And did Ms. Samuelson and Sheryl
 10 Walter communicate from December through March
 11 of -- December 2012 through March of 2013 about
 12 the State Department's processing of the FOIA
 13 request?
 14 A Yes, she did.
 15 Q Okay. Did the State Department confer
 16 with the White House with respect to its
 17 processing of the CREW FOIA request?
 18 A I don't think it conferred with the White
 19 House, but there were some e-mail exchanges
 20 between Sheryl Walter and Heather Samuelson that
 21 talked about the CREW request.
 22 Q With whom? That who talked about the

254

1 CREW request with whom?
 2 A I think there was an inquiry from the
 3 White House about which agencies had received the
 4 FOIA request from CREW about e-mail accounts.
 5 Q And what's the basis for you saying that
 6 you don't believe that the State Department
 7 conferred with the White House about the
 8 processing of the CREW request?
 9 A So it's just my understanding of how our
 10 FOIA processes work. We don't normally confer
 11 with the White House about specific FOIA requests.
 12 Q Okay. Based on your review of the
 13 records and everything you did to prepare for
 14 today's testimony, did you come to any
 15 understanding whether the State Department
 16 conferred with the White House about the
 17 processing of the CREW request?
 18 A I didn't see any documentation that
 19 talked about the State Department conferring with
 20 the White House about the processing of the
 21 request. There were some e-mails that asked for
 22 clarification of which agencies had received FOIA

255

1 requests.
 2 Q And the e-mails that you're referring to,
 3 that you reviewed specific to this topic of your
 4 deposition, were they redacted?
 5 A Yes.
 6 Q Did you review unredacted e-mails
 7 regarding this topic in preparation for your
 8 testimony here today?
 9 A No.
 10 Q Do you agree that the information
 11 contained in those e-mails that was not available
 12 to you because of the redactions is relevant to
 13 your testimony here today?
 14 MR. GARDNER: Objection. Calls for
 15 speculation.
 16 A I mean, it's my understanding that those
 17 redactions all were specific FOIA exemptions, and
 18 that the material in them was not needed for
 19 preparation for this testimony today.
 20 Q And was that understanding based on what
 21 your attorneys told you?
 22 A It's just based on my understanding of

256

1 the process.
 2 Q But we're -- we're not here -- strike
 3 that.
 4 Did the State Department, whether it was
 5 Sheryl Walter or anyone else within IPS, contact
 6 Anne Weismann or any other representative at CREW
 7 after -- on or after December 20th, 2012, to ask
 8 CREW what exactly it was seeking in regards to its
 9 request?
 10 MR. GARDNER: Objection. Form.
 11 A I don't think they had any communication
 12 to clarify.
 13 Q You don't think who had any
 14 communications to clarify?
 15 A That the State Department communicated
 16 with CREW to clarify.
 17 Q How do you know that?
 18 How do you know that?
 19 A In reviewing the timeline that was
 20 prepared for me and the documents.
 21 Q Bear with me for one moment.
 22 I'll come back to that.

257

1 After the State Department responded to
2 the CREW request, did the State Department provide
3 a directive -- or was a directive provided from
4 IPS to not send any further no-records response to
5 requestors for Secretary Clinton's e-mail under
6 FOIA?
7 **A I did not see anything about that.**
8 Q And you did not see anything about that
9 where?
10 **A In the materials that I reviewed.**
11 Q So you don't know whether there was a
12 directive that was sent by IPS after the CREW
13 request to no longer send any further no-records
14 responses to requestors for Secretary Clinton's
15 e-mail under FOIA?
16 **A That's correct.**
17 Q Okay. Exhibit 5.
18 Did the State Department interpret the
19 CREW request as seeking official accounts only and
20 not personal ones?
21 **A Yes, it did.**
22 Q Okay. Did State Department officials

258

1 during this time frame refer to the CREW request
2 as a request relating -- or for Secretary
3 Clinton's personal e-mails?
4 **A So I think there may have been an e-mail**
5 **where one IPS analyst uses the word "personal."**
6 **But the State Department's interpretation of the**
7 **FOIA request is that it was for official e-mail**
8 **accounts.**
9 Q Okay. And did you see the reference that
10 Ms. Walter made with respect to the CREW request
11 about Secretary Clinton's personal e-mail in your
12 review of documents relevant to this topic?
13 **A I don't recall seeing that. I saw the**
14 **e-mail where she e-mails Heather Samuelson and**
15 **others. And she's saying that CREW is requesting**
16 **official accounts only.**
17 Q Okay. And on the e-mail that you do
18 recall where the CREW request is referred to as
19 seeking records pertaining to Secretary Clinton's
20 personal e-mail, was Ms. Walter included in that
21 e-mail chain?
22 **A I'm not sure. I'd have to look it up.**

259

1 Q In the e-mail chain in which -- that
2 contains the e-mail that you're referring to, were
3 there any corrections or any responses to correct
4 the State Department's official's characterization
5 of the CREW request?
6 MR. GARDNER: Objection. Form.
7 **A Not that I saw.**
8 Q Why did the State Department interpret
9 the CREW request as seeking records pertaining
10 only to Secretary Clinton's official accounts,
11 while it was internally referring to the CREW
12 request as relating to Secretary Clinton's
13 personal e-mail?
14 MR. GARDNER: Objection. Form.
15 **A So the department interpreted it as being**
16 **official e-mail accounts because there are several**
17 **other things going on at the same time. There --**
18 **Competitive Enterprise Institute had filed a**
19 **lawsuit against the EPA seeking records for e-mail**
20 **accounts for EPA administrators using alias e-mail**
21 **accounts. And there were some media reports about**
22 **it, too.**

260

1 **And the CREW FOIA request itself refers**
2 **to e-mail accounts that are identifiable as those**
3 **of or associated with Hillary Clinton. It says**
4 **that it's likely to contribute to greater public**
5 **awareness of the extent to which Secretary**
6 **Clinton, like the administrator of the EPA, uses**
7 **e-mail accounts not readily identifiable as her**
8 **accounts.**
9 **So their interpretation was that they**
10 **were speaking about official e-mail accounts, but**
11 **using -- where seniors sometimes used aliases for**
12 **e-mails.**
13 Q Okay. Can I ask, what did you read for
14 your answer to my question?
15 **A It's Exhibit 5.**
16 Q And what part of Exhibit 5 did you read
17 to answer the question?
18 **A It's the first three bullets.**
19 Q Okay. So based on your answer, I guess
20 it begs the question why then did State Department
21 officials refer to the CREW request as pertaining
22 to personal e-mail, if it -- if the State

Conducted on June 19, 2019

261

1 Department did not believe that that's what the
 2 request was seeking?
 3 MR. GARDNER: Objection. Form.
 4 **A I don't know why the one IPS analyst**
 5 **referred to it as personal e-mail in that one**
 6 **e-mail, when all of the other documents refer to**
 7 **interpreting the request as official e-mail.**
 8 Q Did you review an e-mail from Karen
 9 Finnegan to Sheryl Walter and Jonathan Davis on
 10 April 4, 2013, stating that she learned that from
 11 IRM that S has its own e-mail system?
 12 **A Yes.**
 13 Q Okay. And what does S stand for?
 14 **A The Office of the Secretary.**
 15 Q Okay. And did the Office of the
 16 Secretary have its own e-mail system back in --
 17 **A Yes.**
 18 Q -- April 4, 2013?
 19 **A Yes, it did.**
 20 Q And what was the e-mail system that the
 21 Office of the Secretary had during that time?
 22 **A It's called POEMS, P-O-E-M-S.**

262

1 Q And what is POEMS?
 2 **A I don't know what the abbreviation stands**
 3 **for, or if it's an abbreviation, or if it's just**
 4 **the name of the system.**
 5 Q That's okay. I mean, my question is more
 6 as to if you can describe what -- what POEMS is.
 7 **A So it's an e-mail system that the Office**
 8 **of the Secretary and the Deputy Secretary and**
 9 **several of the Under Secretaries and their staffs**
 10 **use to communicate.**
 11 Q And was POEMS used by the Office of the
 12 Secretary during Secretary Clinton's tenure?
 13 **A Yes, it was.**
 14 Q What do you rely on for your answer that
 15 POEMS was used by the Secretary's office during
 16 Secretary Clinton's tenure?
 17 **A My personal knowledge of the State**
 18 **Department.**
 19 Q And I guess can you be more specific with
 20 that answer?
 21 What does your personal knowledge of the
 22 State Department mean, or what are you referring

263

1 to?
 2 **A Sure. So I had worked for the State**
 3 **Department for a number of years and interacted**
 4 **with the staff of the seventh floor, at one point**
 5 **part of my job was to assist with Secretaries of**
 6 **State who were traveling and their Top Secret**
 7 **communication systems.**
 8 **So I was familiar, been familiar**
 9 **throughout the course of my career with the e-mail**
 10 **system that the Office of the Secretary and other**
 11 **seniors at the department use.**
 12 Q Okay. And in preparing for your
 13 deposition here today, did you confirm with
 14 anybody or discuss with Jonathon Wasser whether
 15 the e-mail system referenced in this April 4,
 16 2013, e-mail, refers to POEMS?
 17 MR. GARDNER: Objection. Form.
 18 **A No, I did not.**
 19 Q Okay. We're almost done.
 20 What is the e-mail address
 21 sshrc@state.gov?
 22 MR. GARDNER: Objection. Form.

264

1 **A I believe that that's an e-mail alias**
 2 **that was used by the Office of the Secretary to**
 3 **send out general announcements and things.**
 4 Q How do you know that?
 5 How do you know that?
 6 **A It came up in discussion in preparing for**
 7 **this.**
 8 Q And in what; discussions with your
 9 attorneys, or with one of the witnesses that --
 10 Jonathon Wasser or Mr. Bair?
 11 **A In discussions with the attorneys.**
 12 Q So the information that you rely on with
 13 respect to your knowledge pertaining to the e-mail
 14 address sshrc@state.gov was obtained from your
 15 attorneys. Is that right?
 16 **A Yes.**
 17 Q Okay. In 2010 did two S/ES-IRM staff
 18 members raise concerns to John Bentel about
 19 Secretary Clinton's use of a personal e-mail
 20 account?
 21 **A Am I missing one of my exhibits?**
 22 MR. GARDNER: Which exhibit are you

265

1 looking for?
2 THE WITNESS: The one that talks about
3 the understanding.
4 MR. GARDNER: Right there?
5 THE WITNESS: Yes. Thank you.
6 **A So can you repeat your question?**
7 Q In 2010 did two S/ES-IRM staff members
8 raise concerns to John Bentel about Secretary
9 Clinton's use of a personal e-mail account?
10 **A Two staff in S/ES IRM, according to the**
11 **OIG report, did raise concerns to the then**
12 **director of S/ES-IRM. I'm not sure if that's the**
13 **individual that you are referring to.**
14 Q And for the record, what OIG report are
15 you referring to to answer the question?
16 **A This is the OIG report of May 2016. It's**
17 **entitled Office of the Secretary: Evaluation of**
18 **E-Mail Records Management and Cyber Security**
19 **Requirements.**
20 Q Okay. And is the State Department's
21 position that the statements reflected in the OIG
22 report about the concerns raised by the two staff

266

1 members to John Bentel, that that is accurate?
2 **A I believe that it's accurate.**
3 Q Okay. Did you review the State
4 Department's OIG report that was issued in May --
5 the entire report that was issued in May 2016?
6 **A I did briefly.**
7 Q Okay. You reviewed that OIG report in
8 preparation for your deposition here today.
9 Correct?
10 **A Correct.**
11 Q Okay. And does the State Department --
12 excuse me. Does the State Department disagree
13 with any finding or any statements that are made
14 by the OIG in that report?
15 MR. GARDNER: Objection. Overbroad and
16 beyond the scope to the extent it goes beyond the
17 topics identified in the 30(b)(6) notice.
18 If you have specific statements you want
19 the State Department to confirm that are within
20 the scope, I'm happy to let her do that. But I
21 can't have her broadly answer that kind of
22 question.

267

1 Q Okay. With respect to the OIG report
2 from May 2016, with respect to the discussion
3 regarding Mr. Bentel's notation that an e-mail
4 account and address had already been set up for
5 Secretary Clinton, and notation that she or her
6 staff should be aware that any e-mail would go
7 through the department's infrastructure and
8 subject to FOIA searches, is it the State
9 Department's position that this is accurate?
10 **A Can you tell me what page you're looking**
11 **at in the report?**
12 Q Sure. Page 38.
13 **A And which part, portion?**
14 (A discussion was held off the record.)
15 MR. GARDNER: Ramona, you're asking about
16 the first bullet point on Page 38?
17 MS. COTCA: I'm trying to see which,
18 which bullet point.
19 MR. GARDNER: Oh, I'm sorry. I thought
20 there was already a question pending.
21 MS. COTCA: There is a question pending.
22 Q The third bullet point. And specifically

268

1 with respect to the discussion about then
2 Executive Secretary informing staff of his intent
3 to provide two devices to Secretary Clinton's use,
4 one with an operating State Department e-mail
5 account, which would mask her identity but which
6 would also be subject to FOIA requests, and
7 another which would just have a phone and internet
8 capability.
9 Is it the State Department's position
10 that this is an accurate statement from the
11 Executive Secretary back in August 2011?
12 **A I have no reason to believe it's**
13 **inaccurate.**
14 Q Okay. And then with respect -- in the
15 same bullet point, with respect to the statement
16 regarding the director of S/ES-IRM. Do you know
17 who the director of S/ES-IRM was back in August of
18 2011?
19 **A I do not.**
20 Q Okay. All right. Well, with respect to
21 the notation of the director of S/ES-IRM noting
22 that an e-mail account and address had already

Conducted on June 19, 2019

269

1 been set up, and his statement that you should be
 2 aware that any e-mail would go through the
 3 department's infrastructure and subject to FOIA
 4 searches, is the State Department's position that
 5 these statements are -- accurately represent that
 6 were made by the director of S/ES-IRM in August
 7 2011?
 8 MR. GARDNER: Just to be clear, Ramona,
 9 are you asking whether it's accurate that he said
 10 it?
 11 MS. COTCA: Yes.
 12 MR. GARDNER: Okay.
 13 **A I mean, I have no reason to think it's**
 14 **inaccurate. It's part of an OIG report.**
 15 Q When did Mr. Bair first learn of the
 16 eight e-mails that would be produced to the Hill
 17 in the summer of 2014 that related to Benghazi?
 18 **A Well, I assume he would have learned**
 19 **about them when he was working on the**
 20 **congressional document search.**
 21 Q Did you confirm with him when he learned,
 22 when he first was aware of the eight e-mails from

270

1 Secretary Clinton's personal e-mail account about
 2 Benghazi?
 3 **A He didn't have a lot of specific**
 4 **recollection. But he -- we talked a little bit**
 5 **about what Gene Smilansky had talked about with**
 6 **regard to the congressional document review. And**
 7 **he didn't have any -- he didn't say anything, or**
 8 **that he remembered differently.**
 9 Q Did you ask Mr. Bair to review his
 10 e-mails to be able to confirm whether -- when he
 11 was first made aware of Secretary Clinton's
 12 e-mails regarding Benghazi from her personal
 13 e-mail account?
 14 **A No, I did not.**
 15 Q Did S/ES-IRM add Clintonemail.com domain
 16 to an exception list so that the e-mails from the
 17 Clinton domain would be delivered to state.gov
 18 e-mail addresses?
 19 MR. GARDNER: Objection. Form.
 20 **A I don't know.**
 21 Q Did you speak with anybody or review any
 22 documents from the office of S/ES-IRM in

271

1 preparation for your deposition here today?
 2 **A No, I did not.**
 3 Q What's the office of S/ES-IRM?
 4 **A It is the Office of the Secretary, Office**
 5 **of the Executive Secretariat Information Resources**
 6 **Management.**
 7 Q And they basically handle the IT for the
 8 Secretary's office? Is that fair?
 9 **A That's fair.**
 10 Q Okay. And that office was primarily
 11 responsible for any IT-related issues for
 12 Secretary Clinton's office during her tenure.
 13 Correct?
 14 **A That's correct.**
 15 Q Okay. Other than the Exhibit 2 through
 16 Exhibit 7, I believe, that were prepared by your
 17 attorneys, did you, yourself, prepare anything or
 18 take any notes during your review of the materials
 19 in preparation -- for your preparation of today's
 20 testimony?
 21 **A I did not take any notes.**
 22 Q Did you ever discuss with Mr. Stein his

272

1 understanding of Secretary Clinton's e-mail use in
 2 2014? And I'm not -- my question is not
 3 specifically limited for purposes of this
 4 deposition.
 5 MR. GARDNER: I'm sorry. I'm not sure
 6 what you mean by that last caveat, by it's not
 7 limited to this deposition.
 8 Are you asking about ever or in
 9 preparation? Is that the distinction you're
 10 trying to make?
 11 MS. COTCA: Correct.
 12 MR. GARDNER: Okay.
 13 Q My question is, did you ever speak with
 14 Mr. Stein about his understanding of Secretary
 15 Clinton's e-mail use in 2014?
 16 **A No, I did not.**
 17 Q Did you ever speak with Mr. Stein about
 18 the State Department's processing of the FOIA --
 19 of the CREW FOIA request?
 20 **A No, I did not.**
 21 Q Did you ever speak with Mr. Stein about
 22 the return of Secretary Clinton's e-mails and the

273

275

1 State Department's request to Secretary Clinton's
2 e-mails?

3 **A No, I did not.**

4 Q Did you ever speak with Mr. Stein about
5 the processing, the State Department's processing
6 of plaintiff's FOIA request at issue in this case?

7 **A No; other than to say that I was going to
8 be the witness.**

9 Q Okay.

10 MS. COTCA: I think that's all we have.

11 MR. GARDNER: I think I said this before,
12 but the witness will reserve the right to read and
13 sign. Okay.

14 VIDEO SPECIALIST: If there are no
15 further questions then this ends the deposition,
16 and we are going off the record at 18:05.

17 (Off the record at 6:05 p.m.)
18
19
20
21
22

1 CERTIFICATE OF SHORTHAND REPORTER - NOTARY PUBLIC

2 I, Debra Ann Whitehead, the officer before whom

3 the foregoing deposition was taken, do hereby

4 certify that the foregoing transcript is a true and

5 correct record of the testimony given; that said

6 testimony was taken by me stenographically and

7 thereafter reduced to typewriting under my

8 direction; that reading and signing was requested;

9 and that I am neither counsel for, related to, nor

10 employed by any of the parties to this case and have

11 no interest, financial or otherwise, in its outcome.

12 IN WITNESS WHEREOF, I have hereunto set my hand and

13 affixed my notarial seal this 19th day of June,

14 2019.
15

16 My commission expires:

17 September 14, 2023

18

19 

20 NOTARY PUBLIC IN AND FOR THE

21 DISTRICT OF COLUMBIA
22

274

1 ACKNOWLEDGMENT OF DEPONENT

2 I, ELISSA GUITRON PITTELE, do hereby
3 acknowledge that I have read and examined the
4 foregoing testimony, and the same is a true,
5 correct and complete transcription of the
6 testimony given by me, and any corrections appear
7 on the attached Errata sheet signed by me.
8
9 _____

10 (DATE)

(SIGNATURE)

11
12
13
14
15
16
17
18
19
20
21
22

A			
abbreviation 262:2, 262:3	257:19, 258:8, 258:16, 259:10, 259:16, 259:20, 259:21, 260:2, 260:7, 260:8, 260:10	73:5, 114:18, 141:16, 148:2, 154:14, 157:12, 162:9, 162:10, 168:18, 169:2, 180:1, 185:4, 185:7, 199:14, 208:7, 247:4, 248:19	advanced 18:19
abedin 110:16, 130:1, 130:4, 131:7, 134:14, 135:19, 187:5, 188:2, 230:20	accuracy 232:11, 235:2, 236:11, 237:7, 239:8, 240:2	ad 136:21	advice 61:5, 61:9, 61:13
abedin's 104:12, 108:11, 108:19, 109:10, 110:2	accurate 46:7, 141:1, 196:6, 197:1, 197:13, 198:18, 228:20, 233:2, 233:9, 234:18, 241:11, 266:1, 266:2, 267:9, 268:10, 269:9	add 270:15	advisor 55:10, 55:17, 58:3, 59:20, 60:9, 60:22, 72:19
able 9:16, 10:4, 10:15, 24:5, 86:18, 88:7, 106:16, 133:11, 149:18, 150:16, 175:11, 184:16, 191:15, 270:10	accurately 20:20, 161:3, 269:5	added 238:16, 240:11, 241:1	advisor's 44:8, 136:12
absolutely 92:12, 221:6, 225:12	acknowledge 274:3	addition 60:13, 119:17	affairs 45:11, 192:5, 192:11, 195:11, 195:15, 245:14, 252:4, 252:7
accept 93:21	acknowledged 78:4	additional 133:13, 135:18, 137:9, 145:4, 146:6, 168:8, 176:4, 188:2, 238:20, 240:22	affixed 275:13
access 20:8	acknowledgment 274:1	address 71:11, 71:13, 74:9, 75:16, 75:20, 76:1, 76:7, 76:12, 199:8, 204:2, 204:7, 204:11, 206:5, 206:6, 207:22, 263:20, 264:14, 267:4, 268:22	after 10:13, 63:1, 64:11, 64:20, 65:12, 66:22, 67:2, 67:4, 67:16, 67:18, 68:13, 68:15, 74:9, 126:14, 151:14, 152:8, 153:11, 153:15, 157:14, 167:10, 178:15, 187:2, 187:22, 207:3, 222:15, 224:17, 232:10, 233:3, 234:14, 236:9, 256:7, 257:1, 257:12
according 131:5, 142:2, 265:10	across 56:9, 71:8, 72:7, 72:21, 73:9, 73:17, 74:10	addresses 74:19, 270:18	aftermath 19:2, 210:19, 213:14
account 45:12, 51:2, 76:17, 158:19, 182:15, 203:6, 203:13, 203:16, 204:16, 204:21, 264:20, 265:9, 267:4, 268:5, 268:22, 270:1, 270:13	act 20:6, 20:9, 20:11, 20:15	adequacy 213:16, 223:13, 224:9	again 18:10, 34:9, 35:10, 48:16, 64:22, 82:16, 88:2, 88:13, 96:2, 109:7, 111:13, 112:5, 117:2, 121:17,
accountability 226:17	acting 19:13, 19:20, 58:9, 58:22, 64:13, 64:16	administration 19:15, 24:18	
accounts 108:21, 129:22, 158:1, 158:8, 158:14, 254:4,	action 1:6	administration's 223:21, 224:18	
	active 25:18	administrator 260:6	
	actually 26:1, 26:4, 33:13, 37:15, 41:14, 70:3,	administrators 259:20	

<p>123:15, 129:9, 144:17, 145:8, 151:19, 156:14, 169:5, 172:2, 179:6, 181:17, 190:9, 195:12, 204:19, 209:4, 214:22, 219:14, 224:13, 225:13, 230:10, 234:19, 240:4, 240:6, 240:8, 242:9 against 259:19 agencies 21:13, 254:3, 254:22 agency 169:17 ago 30:8, 37:22, 75:15, 136:1, 197:11, 232:6, 234:9, 238:3, 238:7 agree 106:17, 175:20, 176:7, 176:20, 177:15, 178:8, 180:19, 182:8, 182:9, 190:19, 198:1, 203:4, 203:11, 210:22, 211:9, 212:8, 222:21, 255:10 agrees 178:18 ahead 10:13, 43:15, 51:9, 89:20, 94:19, 249:17 aid 230:9 al 6:11 alias 259:20, 264:1 aliases 260:11</p>	<p>all 10:15, 11:10, 11:12, 11:14, 12:4, 13:2, 14:16, 17:5, 17:22, 29:4, 46:9, 47:10, 50:15, 87:1, 87:11, 87:15, 88:13, 88:14, 89:10, 91:12, 113:9, 114:11, 119:1, 119:14, 121:22, 123:17, 124:4, 125:4, 125:7, 138:14, 142:18, 146:2, 147:3, 152:16, 161:3, 162:6, 183:21, 185:2, 189:14, 189:19, 189:20, 191:6, 191:9, 195:21, 200:8, 214:5, 223:16, 232:17, 247:13, 255:17, 261:6, 268:20, 273:10 allowed 213:5 almost 263:19 along 62:14, 89:11 already 76:3, 107:10, 119:4, 119:8, 119:17, 233:18, 234:21, 249:19, 267:4, 267:20, 268:22 also 4:19, 10:4, 10:9, 10:10, 10:14, 14:11, 20:7, 27:20, 30:21, 31:7, 49:3, 58:12,</p>	<p>58:15, 58:19, 60:15, 83:12, 100:12, 102:1, 107:6, 110:7, 130:6, 133:2, 137:22, 140:14, 158:18, 160:6, 199:5, 221:12, 226:17, 268:6 alterations 241:18 always 186:21 ambassador 17:7, 18:8, 18:14, 138:3, 177:3, 177:20, 178:12, 207:2, 207:10, 207:12, 210:6, 216:3, 216:11, 216:13, 216:19, 217:7, 225:6, 226:1 amended 5:8, 14:18, 17:13, 17:16, 18:2, 220:18 analyst 26:12, 135:8, 135:9, 258:5, 261:4 analysts 136:11 ann 275:2 anne 256:6 announcements 264:3 annual 29:5 annually 29:10 another 10:22, 83:4, 91:22, 129:18, 160:6, 200:21, 238:22, 268:7</p>	<p>answer 9:16, 10:8, 10:12, 10:13, 11:7, 11:8, 24:14, 32:20, 33:17, 43:18, 61:7, 64:18, 75:8, 79:21, 84:18, 84:21, 98:2, 98:3, 105:3, 106:6, 106:14, 106:16, 106:21, 139:2, 144:14, 159:10, 165:3, 176:14, 179:6, 185:7, 187:17, 189:7, 202:6, 202:7, 203:9, 203:21, 211:17, 211:19, 211:20, 214:13, 215:13, 220:1, 220:6, 223:3, 224:6, 224:11, 225:12, 225:17, 247:9, 253:7, 260:14, 260:17, 260:19, 262:14, 262:20, 265:15, 266:21 answered 75:7, 106:15, 169:14, 179:5, 197:15, 200:11, 211:16 answering 10:2, 32:22, 43:12, 126:8, 128:3 answers 57:18, 105:21, 106:1, 106:22, 133:18, 206:20 anticipate 10:5 anybody 36:1, 37:11, 38:21, 64:5,</p>
---	--	---	---

<p>66:10, 69:7, 69:17, 122:14, 122:22, 171:4, 242:15, 263:14, 270:21 anymore 109:22 anyone 163:8, 173:12, 175:2, 256:5 anything 13:15, 15:2, 33:16, 40:3, 42:22, 71:15, 74:12, 77:3, 83:10, 85:11, 85:16, 85:17, 93:12, 94:7, 119:16, 143:18, 150:1, 152:6, 164:1, 164:22, 178:14, 185:22, 189:13, 196:22, 197:11, 202:14, 224:3, 228:5, 228:18, 230:4, 231:3, 231:14, 232:11, 233:1, 234:16, 237:6, 257:7, 257:8, 270:7, 271:17 apologize 43:14, 76:5 apparent 79:18 appear 274:6 appearances 17:8, 18:9, 18:11, 18:15, 19:2, 222:15, 225:7 appeared 216:4, 216:19 appearing 99:17 appears 63:18, 142:3</p>	<p>applied 100:16 appoint 223:19 appraisal 169:17 appreciate 106:11 appropriate 23:2 approved 2:13 approximately 209:12, 214:18, 215:5 april 58:5, 58:21, 59:21, 60:8, 64:14, 72:14, 72:17, 72:22, 73:4, 73:7, 112:4, 200:6, 261:10, 261:18, 263:15 areas 219:12 aren't 148:22, 180:1, 251:12 argumentative 189:11 around 30:9, 45:12, 45:20, 53:1, 72:3, 223:16 arranged 192:4, 192:11, 195:10, 195:15, 247:14 arranging 245:14 arrived 92:14 articulate 201:18, 219:10 ask 10:1, 10:4, 10:10, 10:20,</p>	<p>10:21, 13:5, 37:7, 46:14, 51:14, 51:19, 63:22, 73:6, 74:13, 77:1, 77:19, 81:2, 81:10, 97:18, 119:4, 119:9, 121:17, 133:17, 138:6, 147:22, 149:3, 149:9, 149:14, 153:3, 153:9, 157:1, 158:4, 171:9, 171:17, 173:15, 175:2, 184:15, 185:9, 194:8, 194:16, 194:19, 222:22, 251:17, 251:18, 256:7, 260:13, 270:9 asked 10:5, 28:20, 57:22, 58:12, 58:15, 58:19, 75:6, 82:7, 108:20, 110:15, 119:8, 121:20, 163:12, 164:7, 168:16, 169:13, 173:10, 173:11, 175:8, 175:16, 179:4, 193:2, 193:9, 193:16, 197:14, 211:15, 228:8, 228:9, 228:10, 228:11, 230:7, 230:11, 231:9, 231:11, 235:8, 236:21, 238:21, 239:3, 254:21 asking 10:7, 32:2, 52:9, 73:1, 87:13, 87:19, 87:20, 88:3, 103:17, 124:18,</p>	<p>125:4, 155:20, 162:9, 170:8, 170:10, 171:1, 178:1, 190:16, 201:9, 201:15, 220:2, 220:15, 223:4, 240:15, 248:20, 267:15, 269:9, 272:8 aspect 97:21 assigned 28:9, 28:11, 66:6, 77:9, 126:17 assignment 28:5, 28:6, 28:15, 66:2 assist 64:5, 193:14, 263:5 assistance 61:14 assistant 58:4, 60:1, 60:4, 60:16, 61:6, 61:10, 62:9, 160:4 assisting 73:17 associate 56:16 associated 260:3 assume 11:1, 269:18 assuming 203:15, 243:9 attached 5:6, 86:10, 154:15, 154:19, 154:22, 274:7 attack 19:7, 210:9, 211:4, 211:14, 212:10, 212:13, 213:2, 214:2, 214:20, 214:21,</p>
--	---	---	---

<p>215:7, 215:9, 217:14, 218:22, 219:16, 222:11, 223:9, 223:22, 224:4, 224:16, 226:16 attacked 218:19 attacks 177:4, 177:21, 209:2, 209:6, 209:11, 209:17, 210:3, 210:14, 210:20, 211:2, 211:7, 211:11, 212:21, 215:17, 215:21, 215:22, 216:17, 217:16, 218:5, 219:6, 223:10, 225:2, 226:12, 227:1 attempt 172:7, 248:9, 249:12 attention 141:18 attorney 11:5, 11:8, 38:20, 39:1, 44:8, 44:12, 44:15, 55:9, 59:15, 62:21, 69:11, 77:9, 88:9, 170:2, 189:2 attorneys 9:13, 10:9, 11:17, 13:17, 37:16, 38:7, 38:8, 38:13, 38:17, 38:18, 47:15, 47:22, 48:5, 55:16, 66:11, 83:13, 89:2, 151:1, 151:3, 151:4, 156:7, 156:19, 163:9, 169:20,</p>	<p>170:6, 171:5, 171:11, 172:17, 174:2, 174:15, 175:4, 175:12, 175:15, 175:17, 193:6, 193:22, 194:5, 194:15, 194:18, 197:10, 228:6, 229:22, 230:3, 232:8, 233:3, 234:15, 236:10, 238:18, 240:20, 242:16, 242:18, 242:20, 242:21, 251:11, 251:12, 255:21, 264:9, 264:11, 264:15, 271:17 attributed 105:19 august 76:16, 164:2, 164:13, 164:17, 165:7, 179:12, 179:17, 180:21, 182:18, 183:1, 189:3, 189:15, 192:6, 192:12, 195:8, 195:10, 195:13, 244:3, 244:6, 245:12, 246:13, 246:14, 246:21, 249:5, 268:11, 268:17, 269:6 austin-ferguson 6:15 available 31:9, 92:1, 250:14, 251:9, 255:11 avenue 4:6 avoid 186:2 aware 40:18, 40:19, 43:3, 50:20,</p>	<p>50:22, 52:2, 70:14, 158:18, 159:19, 161:12, 161:18, 162:1, 164:3, 164:11, 164:12, 165:9, 179:2, 181:3, 181:22, 182:17, 183:2, 184:8, 250:12, 267:6, 269:2, 269:22, 270:11 awareness 159:6, 159:15, 160:7, 160:8, 163:6, 260:5 away 125:19 <hr/>B<hr/>b) (6 5:10, 7:3, 14:19, 32:6, 98:1, 201:4, 201:5, 213:14, 219:9, 220:14, 222:5, 266:17 back 12:19, 14:3, 18:7, 25:22, 26:4, 26:8, 26:9, 30:6, 33:19, 35:14, 40:18, 54:18, 57:14, 62:6, 76:9, 79:2, 82:3, 90:22, 99:6, 99:7, 106:12, 125:16, 149:8, 153:20, 156:4, 163:12, 173:6, 196:15, 197:19, 203:7, 203:14, 208:17, 228:2, 229:2, 230:9, 230:16, 232:22, 233:7, 235:3, 238:10,</p>	<p>238:12, 239:4, 245:3, 245:6, 249:5, 256:22, 261:16, 268:11, 268:17 back-and-forth 238:17 backing 114:18 bad 49:1, 49:3, 168:22 bair 39:3, 39:4, 39:9, 39:12, 39:18, 40:1, 40:5, 40:8, 40:10, 41:3, 42:16, 43:21, 44:8, 44:21, 45:4, 45:9, 45:18, 45:20, 46:4, 46:6, 46:9, 65:15, 65:22, 66:15, 66:22, 67:4, 67:15, 68:12, 69:5, 70:1, 70:11, 70:22, 71:22, 73:1, 73:2, 74:1, 74:7, 74:21, 75:16, 75:22, 76:13, 76:19, 77:4, 77:6, 77:9, 82:9, 82:12, 83:8, 83:16, 85:6, 119:13, 119:16, 119:18, 134:10, 147:15, 171:15, 171:17, 173:11, 173:15, 173:22, 174:5, 174:7, 174:14, 175:2, 175:10, 175:13, 175:16, 186:14, 189:2, 189:7,</p>
--	---	---	---

<p>189:12, 189:15, 189:21, 190:14, 190:17, 191:5, 191:10, 264:10, 269:15, 270:9 bair's 70:20, 72:13 banker 166:7, 167:14, 169:10, 184:9, 185:5 bankers 165:16 base 188:12, 189:13 based 22:7, 98:3, 149:11, 226:4, 254:12, 255:20, 255:22, 260:19 basically 240:9, 271:7 basis 23:19, 29:5, 60:11, 139:20, 148:12, 148:13, 183:22, 219:20, 224:21, 252:5, 254:5 batch 103:22 bates 99:1, 99:16, 99:17 bear 256:21 became 27:18, 40:19, 43:3, 58:6, 58:9, 58:10, 58:21, 64:15, 70:14, 159:19, 161:18 because 17:16, 33:1, 65:15, 70:4, 87:18, 91:17, 94:12, 98:22,</p>	<p>114:2, 116:18, 122:11, 123:17, 140:4, 168:6, 177:8, 179:7, 205:3, 205:20, 207:1, 217:7, 217:22, 223:6, 240:8, 255:12, 259:16 become 49:19 been 8:20, 9:9, 9:14, 14:17, 18:2, 21:20, 22:3, 28:21, 31:16, 34:15, 35:12, 36:9, 43:19, 44:12, 48:19, 48:21, 58:14, 60:17, 61:19, 65:17, 70:15, 71:9, 78:8, 83:19, 91:7, 91:18, 91:21, 111:5, 112:6, 114:10, 116:22, 118:12, 128:21, 129:5, 129:11, 135:6, 135:7, 135:11, 135:12, 137:17, 166:20, 172:20, 178:10, 183:14, 184:13, 194:10, 196:12, 198:8, 200:9, 201:10, 208:1, 221:9, 228:1, 228:7, 229:4, 230:5, 231:11, 239:7, 240:1, 243:21, 248:11, 250:14, 250:20, 250:21, 251:13, 253:4, 258:4, 263:8, 267:4, 269:1 before 2:12, 9:9,</p>	<p>10:3, 13:18, 15:7, 23:22, 25:18, 66:22, 67:4, 67:15, 157:12, 163:13, 171:20, 172:4, 198:12, 208:20, 222:15, 234:13, 240:16, 243:2, 252:15, 273:11, 275:2 began 160:6 begin 30:7, 37:20 beginning 63:17, 138:20 begins 7:2, 97:5 begs 185:7, 260:20 behalf 3:2, 3:13, 4:2, 4:10, 8:3, 8:7, 8:9, 15:19, 20:15, 33:1, 170:20, 194:20, 248:4 behind 201:15 being 9:19, 9:20, 10:5, 24:5, 49:15, 66:7, 92:11, 108:20, 109:4, 140:17, 149:18, 216:12, 259:15 bekesha 3:6, 7:22 believe 16:13, 17:8, 18:10, 22:15, 27:13, 28:20, 29:7, 30:16, 34:4, 34:22, 35:4, 35:15, 48:2, 48:21,</p>	<p>53:7, 55:5, 55:16, 57:2, 62:15, 63:3, 64:12, 73:11, 73:20, 74:15, 79:3, 84:20, 89:10, 89:16, 96:7, 97:1, 98:13, 99:21, 101:2, 106:4, 107:10, 108:9, 108:10, 110:7, 112:18, 113:3, 114:1, 116:3, 116:13, 117:9, 119:3, 119:13, 130:16, 133:1, 140:14, 144:12, 145:15, 146:13, 148:20, 149:21, 150:20, 151:1, 151:18, 154:17, 154:18, 154:21, 155:18, 159:17, 160:5, 167:10, 168:6, 170:1, 173:8, 176:2, 179:13, 188:4, 188:9, 188:11, 188:15, 188:19, 200:6, 206:21, 207:17, 207:19, 213:21, 213:22, 221:14, 235:22, 237:5, 243:2, 243:21, 247:17, 251:5, 252:8, 252:14, 252:21, 254:6, 261:1, 264:1, 266:2, 268:12, 271:16 benghazi 6:8, 19:7, 71:8, 73:18, 73:20, 73:21, 73:22, 74:3, 89:9, 177:5, 177:21, 179:11,</p>
---	--	--	---

<p>180:7, 181:14, 182:2, 182:10, 182:19, 208:10, 208:22, 209:2, 209:7, 209:12, 209:17, 210:2, 210:9, 210:14, 210:20, 211:2, 211:4, 211:7, 211:11, 211:14, 212:4, 212:10, 212:13, 212:16, 212:21, 213:2, 213:6, 213:15, 213:16, 214:2, 215:22, 216:18, 217:11, 217:14, 217:16, 218:5, 218:20, 219:7, 219:16, 223:2, 223:21, 224:4, 224:16, 225:2, 225:11, 225:15, 226:11, 227:1, 227:3, 269:17, 270:2, 270:12 benghazi-related 74:10 bentel 264:18, 265:8, 266:1 bentel's 267:3 best 184:4 between 34:15, 64:14, 78:18, 78:20, 101:2, 136:11, 153:20, 160:11, 187:14, 189:3, 189:14, 189:17, 189:21, 190:17, 191:5, 191:10, 216:16, 236:22, 240:16, 253:20 beyond 32:18, 33:2,</p>	<p>33:8, 98:1, 201:3, 202:5, 202:7, 213:4, 213:18, 214:12, 215:11, 215:14, 219:8, 266:16 binder 5:22, 6:3, 6:5, 6:7, 6:8, 6:9, 42:1, 89:9, 89:10, 89:14, 89:15, 89:17, 90:4, 90:6, 94:22, 95:1, 95:2, 103:6, 104:2, 109:19, 111:8, 112:6, 112:8, 120:20, 123:13, 155:9, 168:12, 191:8, 196:8, 197:4, 197:18, 197:21, 200:4, 220:19, 239:5, 242:9 binders 13:3, 13:16, 14:1, 47:13, 47:19, 47:22, 78:12, 87:9, 87:12, 87:17, 88:3, 88:6, 88:9, 88:14, 88:22, 89:5, 89:21, 91:13, 91:21, 92:7, 92:9, 92:13, 111:4, 114:9, 114:11, 116:6, 116:11, 116:15, 116:22, 118:12, 122:1, 123:8, 130:18, 140:2, 191:11, 194:14, 195:22, 196:8, 206:16, 229:1, 229:4, 232:14, 233:8, 234:21, 235:1, 239:7,</p>	<p>239:13, 240:1, 240:8, 240:10, 241:9, 241:13, 242:8 bit 13:17, 22:19, 26:1, 72:6, 77:19, 83:18, 83:22, 270:4 blackberry 108:22, 109:1 blame 216:3 board 226:17 book 99:20 boss 48:13, 101:10 both 100:16, 140:20, 186:20, 187:1, 199:14, 216:9 bottom 43:19, 97:2, 97:3, 103:5, 204:4 boxes 165:16, 166:7, 166:15, 166:19, 167:15, 167:17, 167:20, 169:10, 169:16, 169:18, 184:9, 184:20, 185:5, 185:21 branch 3:18, 22:13, 27:2, 54:11 branches 21:4, 21:5, 21:7, 21:8, 21:19, 21:22 break 11:10, 11:12, 14:3, 41:1, 49:11, 49:13, 59:11, 63:7, 64:12, 64:20,</p>	<p>92:19, 102:9, 140:3, 140:9, 172:21, 172:22, 173:19, 173:21, 174:6, 175:1, 194:13, 208:21, 243:6, 243:9, 244:17, 248:7 brief 185:10 briefing 45:11 briefly 15:14, 156:4, 228:21, 266:6 bring 11:15, 13:14 broad 50:11, 210:19, 225:14 broader 181:15 broadly 94:7, 181:14, 227:3, 266:21 broke 243:2 brought 11:17, 47:15, 48:1, 64:2, 89:1, 157:10 budget 26:18 bullet 63:19, 65:6, 105:7, 139:8, 192:1, 192:17, 194:9, 194:21, 195:7, 244:6, 244:10, 267:16, 267:18, 267:22, 268:15 bullets 260:18 bureau 19:15, 26:13, 27:3, 27:20, 31:14, 96:14</p>
---	---	--	--

<p>burke 3:4, 7:18, 95:9</p> <p>business 158:2, 158:9, 158:14, 158:20, 159:8, 159:16, 159:21, 161:19, 162:3, 162:6, 162:21, 163:17, 165:12</p>	<p>104:1, 111:7, 117:2, 118:15, 121:14, 125:11, 128:9, 128:15, 130:18, 140:8, 143:12, 156:14, 159:13, 168:14, 172:2, 172:22, 174:22, 176:19, 179:6, 179:20, 184:2, 184:4, 185:2, 188:16, 190:8, 191:8, 191:22, 194:13, 201:18, 202:6, 202:10, 203:10, 208:11, 208:12, 214:11, 214:22, 217:5, 219:10, 221:6, 225:18, 231:19, 243:8, 244:17, 244:19, 244:21, 246:1, 246:5, 260:13, 262:6, 262:19, 265:6, 267:10</p>	<p>category 89:13</p> <p>cause 226:11, 226:22</p> <p>caused 215:21</p> <p>caveat 272:6</p> <p>central 222:12</p> <p>certain 114:2, 193:18, 195:1, 218:22, 233:12</p> <p>certainly 95:12</p> <p>certificate 275:1</p> <p>certify 275:4</p> <p>chain 199:3, 199:5, 202:22, 206:22, 207:6, 207:8, 258:21, 259:1</p> <p>chance 185:11, 245:6</p> <p>change 157:12</p> <p>changed 17:16, 238:16, 241:2</p> <p>changes 241:5, 241:6, 241:11, 241:17</p> <p>characterization 259:4</p> <p>characterized 70:6</p> <p>charge 35:1, 35:13, 61:19, 160:17, 186:12</p> <p>charles 56:4, 57:7</p> <p>check 33:15, 35:3, 49:10, 49:13,</p>	<p>49:21, 102:13, 145:18, 194:11, 229:6, 241:12</p> <p>chelsea 215:17, 215:20, 216:17, 217:1, 217:13, 218:7</p> <p>cheryl 104:13, 110:8, 110:12, 111:14, 134:14, 135:18, 164:17, 187:5, 199:1, 199:8, 203:6, 203:12, 203:13, 203:16, 204:6, 204:10, 205:4, 230:21</p> <p>chief 53:7, 54:10, 54:22, 110:13, 110:17</p> <p>christmas 167:10</p> <p>chronologies 193:10, 197:5</p> <p>chronology 86:11, 239:14</p> <p>citation 229:7</p> <p>civil 1:6, 2:5, 4:5</p> <p>claim 224:18</p> <p>clarence 35:15, 45:5, 68:6, 79:3, 101:10, 107:6, 107:9, 107:10, 107:12, 113:4, 128:12, 148:3, 233:16, 233:17, 247:12, 248:13</p> <p>clarification 10:21, 65:18, 70:4, 97:11, 133:11, 228:8, 237:2, 238:20, 254:22</p>
C			
<p>call 21:13, 85:7, 104:17, 137:12, 175:9, 175:10</p> <p>called 21:6, 41:11, 231:22, 235:13, 236:13, 261:22</p> <p>calls 26:17, 176:11, 176:17, 255:14</p> <p>came 44:19, 71:8, 72:21, 73:16, 73:17, 74:10, 76:10, 149:4, 204:22, 205:5, 264:6</p> <p>can 9:5, 9:18, 10:21, 13:6, 14:6, 14:9, 21:10, 22:19, 25:11, 31:9, 33:19, 35:9, 37:15, 41:9, 41:17, 42:4, 49:14, 49:21, 53:22, 57:10, 69:22, 72:16, 77:19, 81:20, 84:17, 90:12, 92:3, 92:10, 95:12, 96:2, 96:18, 98:3, 102:9, 102:12,</p>	<p>184:2, 184:4, 185:2, 188:16, 190:8, 191:8, 191:22, 194:13, 201:18, 202:6, 202:10, 203:10, 208:11, 208:12, 214:11, 214:22, 217:5, 219:10, 221:6, 225:18, 231:19, 243:8, 244:17, 244:19, 244:21, 246:1, 246:5, 260:13, 262:6, 262:19, 265:6, 267:10</p> <p>can't 83:10, 159:10, 185:18, 206:17, 220:5, 266:21</p> <p>cancelled 247:16</p> <p>cannot 223:19, 224:2</p> <p>capability 268:8</p> <p>capacity 218:3</p> <p>career 263:9</p> <p>cars 127:20, 180:18, 237:1</p> <p>cases 21:11, 21:14, 21:16, 84:1, 92:5</p> <p>catalogue 31:7</p>	<p>change 157:12</p> <p>changed 17:16, 238:16, 241:2</p> <p>changes 241:5, 241:6, 241:11, 241:17</p> <p>characterization 259:4</p> <p>characterized 70:6</p> <p>charge 35:1, 35:13, 61:19, 160:17, 186:12</p> <p>charles 56:4, 57:7</p> <p>check 33:15, 35:3, 49:10, 49:13,</p>	<p>christmas 167:10</p> <p>chronologies 193:10, 197:5</p> <p>chronology 86:11, 239:14</p> <p>citation 229:7</p> <p>civil 1:6, 2:5, 4:5</p> <p>claim 224:18</p> <p>clarence 35:15, 45:5, 68:6, 79:3, 101:10, 107:6, 107:9, 107:10, 107:12, 113:4, 128:12, 148:3, 233:16, 233:17, 247:12, 248:13</p> <p>clarification 10:21, 65:18, 70:4, 97:11, 133:11, 228:8, 237:2, 238:20, 254:22</p>

<p>clarify 50:13, 82:6, 86:7, 96:9, 96:12, 233:22, 236:21, 242:2, 256:12, 256:14, 256:16 clarifying 57:17, 95:9 class 29:16, 30:21 clean 9:21 cleaner 42:5, 42:7 clear 9:21, 10:6, 95:4, 146:20, 147:2, 148:8, 148:13, 149:12, 151:14, 154:20, 198:16, 206:4, 231:20, 240:17, 269:8 clearly 223:6 clinton 5:16, 34:10, 40:11, 43:4, 50:16, 52:2, 52:13, 70:16, 71:9, 72:8, 72:9, 75:17, 76:11, 105:1, 105:8, 109:3, 110:14, 110:18, 144:5, 158:13, 159:20, 161:13, 162:2, 162:19, 163:16, 164:3, 164:14, 165:10, 165:21, 166:6, 166:15, 169:20, 172:18, 175:18, 176:8, 178:5, 178:8, 178:15, 179:11, 180:20, 182:4, 182:10,</p>	<p>182:15, 182:18, 184:8, 185:12, 187:4, 199:7, 203:1, 203:5, 203:12, 207:21, 214:16, 215:4, 215:16, 215:17, 215:19, 215:20, 216:10, 216:17, 216:22, 217:1, 217:5, 217:12, 217:13, 218:7, 219:5, 224:16, 230:20, 231:22, 260:3, 260:6, 267:5, 270:17 clintonemail 270:15 clips 42:1 co-director 58:7, 61:18, 61:20, 62:2, 62:13 collection 50:8 columbia 1:2, 2:14, 7:6, 275:21 com 75:17, 199:7, 203:1, 270:15 come 14:3, 20:14, 33:19, 73:9, 117:15, 254:14, 256:22 comes 60:15 coming 56:9, 72:7, 217:4, 218:1 comments 57:17, 94:13 commission 275:16 committee 71:7, 73:20,</p>	<p>74:2, 74:3 communicate 214:16, 215:4, 253:10, 262:10 communicated 256:15 communication 177:19, 189:17, 219:3, 219:4, 256:11, 263:7 communications 182:1, 190:17, 190:18, 256:14 competitive 259:18 complete 106:22, 274:5 completely 20:19, 106:15, 106:16, 161:3, 222:21, 223:11 complex 21:11, 210:18 compport 228:22, 232:14, 233:5, 234:20 compound 203:8, 218:19 con 136:10 concerned 43:7 concerning 5:14, 12:16, 41:11, 63:13, 64:22, 103:1, 103:11, 103:14, 192:5, 192:11, 208:9, 224:4, 229:15 concerns 264:18, 265:8, 265:11, 265:22 conclusion 96:8, 176:12, 176:18 conclusions 95:18, 95:21,</p>	<p>96:4, 97:12, 98:7, 98:10 conduct 124:2, 124:19, 126:20, 135:17, 138:16, 143:14, 145:2, 158:1, 158:8, 158:14, 158:20, 162:2 conducted 78:7, 107:21, 124:2, 124:13, 124:19, 127:14, 127:15, 128:19, 129:14, 131:11, 132:6, 132:14, 133:21, 134:13, 138:19, 142:6, 143:20, 145:7, 146:17, 147:1, 151:19, 152:16, 168:8, 187:13, 187:14, 188:1 conducting 136:15 confer 253:15, 254:10 conferred 253:18, 254:7, 254:16 conferring 254:19 confirm 46:4, 139:18, 173:22, 174:14, 194:4, 196:22, 197:20, 229:2, 232:11, 233:1, 234:16, 248:9, 251:11, 252:21, 263:13, 266:19, 269:21, 270:10 confirmed 139:16, 139:22, 192:16, 195:6, 244:11, 246:19, 251:7 confirming 195:10, 195:14</p>
---	--	---	--

<p>congress 189:4</p> <p>congressional 43:5, 71:7, 72:6, 73:15, 180:15, 181:13, 186:7, 269:20, 270:6</p> <p>conjunction 172:14, 197:5</p> <p>consensus 218:15</p> <p>consider 201:19</p> <p>consistent 218:6, 221:6</p> <p>consult 38:19, 194:14</p> <p>consultation 64:3, 110:6, 111:18, 113:2, 114:22, 117:18, 118:1</p> <p>consultations 136:11</p> <p>consulted 55:17</p> <p>contact 66:10, 173:21, 174:14, 175:1, 248:9, 249:12, 256:5</p> <p>contain 91:7, 167:22, 200:20</p> <p>contained 13:3, 47:22, 64:1, 87:2, 87:5, 88:8, 88:9, 91:4, 91:13, 98:11, 116:10, 116:15, 116:22, 117:11, 118:16, 122:1, 129:3, 129:5, 129:9, 129:12, 130:17, 141:2, 150:9, 165:15,</p>	<p>191:10, 194:1, 196:2, 197:2, 197:12, 202:12, 205:16, 206:5, 206:11, 228:19, 228:22, 229:3, 229:9, 230:14, 231:3, 232:12, 233:2, 233:8, 234:17, 234:22, 236:12, 237:4, 237:7, 239:7, 239:9, 239:22, 240:3, 241:9, 243:12, 255:11</p> <p>contains 246:13, 259:2</p> <p>contemporaneous 225:5</p> <p>content 43:7, 74:18, 76:8, 222:14, 222:17</p> <p>contents 80:20, 81:4, 86:2, 86:7, 86:9, 87:2, 93:1, 93:14, 99:2, 99:13, 99:14, 99:18</p> <p>contesting 212:7</p> <p>context 122:12</p> <p>continue 157:13, 167:12, 169:7, 185:19</p> <p>contradict 216:21</p> <p>contradicting 224:17</p> <p>contribute 260:4</p> <p>conversation 36:4, 36:8, 36:15, 66:15, 66:16, 66:18, 66:21, 67:3,</p>	<p>69:8, 69:20, 70:2, 74:14, 74:20, 75:11, 82:12, 83:8, 83:16, 85:1, 236:17</p> <p>conversations 44:22, 45:8, 45:19, 46:6, 76:15, 109:6, 134:7</p> <p>copies 13:6, 14:21, 164:4, 164:14, 167:7, 191:4</p> <p>copy 13:18, 14:6, 14:18, 77:13, 94:16, 116:5, 120:12, 120:15, 121:21, 123:12, 130:13, 130:14, 141:4, 146:9, 196:11, 196:19, 199:8, 232:7, 234:10, 236:3, 236:9, 238:4, 240:19, 241:3, 245:20, 246:2, 247:20, 250:8, 251:10</p> <p>corporate 15:10, 66:7, 156:1, 218:3</p> <p>correct 41:20, 48:17, 48:18, 65:1, 68:18, 71:20, 71:21, 92:15, 95:7, 95:8, 97:8, 103:20, 109:15, 110:11, 113:5, 114:13, 116:12, 124:21, 125:2, 126:21, 130:11, 134:8, 134:22, 135:3, 146:3, 147:6,</p>	<p>150:13, 151:16, 152:3, 153:13, 155:19, 159:9, 159:11, 160:14, 160:19, 160:20, 161:4, 161:5, 166:9, 166:10, 170:21, 178:5, 178:6, 182:21, 182:22, 183:5, 184:9, 184:10, 186:17, 186:20, 187:6, 187:7, 197:21, 198:2, 199:9, 199:15, 207:19, 208:2, 208:3, 208:5, 222:6, 240:20, 241:15, 246:17, 249:2, 249:3, 249:7, 252:16, 257:16, 259:3, 266:9, 266:10, 271:13, 271:14, 272:11, 274:5, 275:5</p> <p>correction 173:9</p> <p>corrections 259:3, 274:6</p> <p>correctly 42:21, 223:19</p> <p>correspondence 35:12, 35:14, 78:18, 78:20, 79:13</p> <p>correspondences 78:22, 79:14</p> <p>could 9:2, 23:12, 24:14, 26:9, 32:7, 65:15, 92:19, 112:7, 132:21, 135:12, 137:12, 222:16, 222:18, 236:21, 237:13, 243:3</p> <p>couldn't 212:17</p>
--	---	---	---

<p>coulombe 27:9, 31:16</p> <p>counsel 7:14, 8:21, 14:14, 15:5, 17:10, 38:4, 42:12, 59:8, 59:12, 59:13, 64:4, 65:13, 82:17, 83:11, 88:10, 90:21, 110:6, 111:18, 113:2, 114:22, 117:18, 118:1, 173:20, 198:7, 246:10, 247:22, 275:9</p> <p>couple 71:8, 72:7, 245:12, 252:13</p> <p>course 30:20, 30:22, 31:2, 31:5, 92:1, 172:13, 227:18, 263:9</p> <p>courses 31:7</p> <p>court 1:1, 2:14, 7:6, 8:15, 9:14, 9:19, 154:19, 155:3, 161:11, 213:5, 213:10, 213:13, 214:6, 219:20, 220:4</p> <p>court's 213:10, 213:20, 214:11, 219:12, 221:7, 221:17, 222:8, 225:15</p> <p>create 80:10, 193:22, 234:8, 235:21, 236:1</p> <p>created 23:8, 24:1, 234:5, 234:15, 235:17</p>	<p>crew 5:18, 5:22, 12:15, 39:22, 40:2, 40:5, 54:16, 55:15, 56:1, 89:8, 89:18, 92:2, 98:11, 100:6, 100:13, 100:16, 100:20, 101:6, 101:11, 101:15, 234:4, 251:19, 252:11, 252:19, 253:17, 253:21, 254:1, 254:4, 254:8, 254:17, 256:6, 256:8, 256:16, 257:2, 257:12, 257:19, 258:1, 258:10, 258:15, 258:18, 259:5, 259:9, 259:11, 260:1, 260:21, 272:19</p> <p>crew's 16:1</p> <p>cross-reference 205:6</p> <p>current 19:11</p> <p>currently 28:4, 53:20, 249:1</p> <p>custodian 176:8</p> <p>custodians 136:12</p> <p>cut 32:13, 50:12, 106:14, 106:18</p> <p>cyber 265:18</p> <p>cycle 23:7, 23:21</p> <hr/> <p style="text-align: center;">D</p> <hr/> <p>daily 23:18, 60:10</p>	<p>data 26:17</p> <p>database 138:18</p> <p>databases 54:4, 127:20, 128:22, 129:3, 234:1</p> <p>date 7:8, 138:11, 138:15, 139:9, 139:13, 139:17, 139:22, 140:7, 140:11, 141:11, 142:5, 142:11, 142:15, 142:19, 143:7, 144:3, 144:10, 145:1, 145:8, 199:11, 220:20, 220:21, 220:22, 221:14, 226:13, 226:21, 231:6, 238:19, 274:10</p> <p>dated 130:15, 152:10, 246:13, 246:14</p> <p>dates 58:1, 228:8, 228:11, 230:11, 230:12</p> <p>daughter 215:20, 216:11, 217:6</p> <p>davis 261:9</p> <p>day 61:20, 236:7, 236:8, 275:13</p> <p>day-to-day 61:20</p> <p>days 136:9, 245:12</p> <p>dc 1:14, 2:7, 3:10, 3:20, 4:7, 4:15, 7:13</p> <p>deals 183:22</p>	<p>debbie 8:15</p> <p>debra 1:22, 2:12, 275:2</p> <p>december 16:1, 16:18, 52:3, 52:10, 52:12, 52:16, 53:4, 58:18, 98:12, 100:6, 100:20, 105:1, 120:2, 120:9, 121:11, 121:19, 122:15, 138:20, 142:21, 143:15, 144:4, 154:11, 154:22, 155:2, 155:17, 157:15, 161:7, 162:11, 165:8, 165:17, 165:22, 166:2, 166:5, 166:13, 166:14, 167:3, 168:4, 168:6, 169:5, 169:9, 169:19, 169:22, 170:4, 170:10, 171:6, 171:7, 171:8, 171:12, 171:13, 171:22, 172:10, 172:18, 174:17, 179:18, 183:14, 184:6, 184:7, 187:2, 189:3, 189:16, 253:2, 253:3, 253:10, 253:11, 256:7</p> <p>decide 65:9</p> <p>decided 230:14</p> <p>declaration 78:16, 120:10, 122:6, 130:6, 130:14, 130:22, 140:15, 140:16,</p>
---	--	---	---

<p>140:18, 140:21, 141:3, 141:5, 141:9, 141:13, 141:19, 142:3, 142:10, 142:13, 142:15, 143:18, 144:16, 144:18, 151:8 declarations 193:17 dedicated 21:2 deem 206:10 deemed 206:22, 207:9, 207:15, 224:16 defendant 1:8, 3:13, 4:2, 4:10, 8:7, 8:9 defendants 8:4 delivered 270:17 demonstrated 178:14 denied 200:16 departing 25:7 department's 19:6, 23:18, 24:16, 104:9, 105:11, 107:3, 110:3, 110:21, 111:15, 112:1, 112:22, 113:13, 115:19, 118:21, 119:6, 119:11, 120:1, 123:4, 136:15, 151:20, 155:21, 170:20, 186:16, 190:12, 190:21, 201:6, 205:2, 209:15, 210:8, 210:13, 211:3, 211:13, 212:12, 213:1,</p>	<p>213:17, 214:1, 217:15, 218:5, 219:15, 219:19, 223:9, 223:14, 224:10, 225:1, 253:12, 258:6, 259:4, 265:20, 266:4, 267:7, 267:9, 268:9, 269:3, 269:4, 272:18, 273:1, 273:5 department-relat- ed 164:15 department-wide 96:13 departure 24:22 depend 25:9 depending 23:9, 23:13, 24:3 deponent 274:1 depos 7:11, 8:16 depose 224:5 deposed 9:9 depositions 80:2, 80:5, 89:11, 102:1, 102:19, 104:7, 104:8, 106:7, 107:2, 107:14, 108:6, 114:3, 114:6, 115:17, 116:19, 118:19, 119:2, 233:20, 251:8 deputies 19:21 deputy 19:13, 19:20, 20:1, 34:2,</p>	<p>34:5, 35:16, 49:18, 49:19, 58:4, 58:20, 60:1, 60:4, 60:15, 61:6, 61:9, 62:8, 64:14, 110:17, 160:4, 262:8 describe 161:16, 262:6 describing 70:13, 78:17 description 235:14 designated 1:12, 155:22 designee 15:11, 66:7, 91:17, 218:3, 220:15, 220:16, 224:11 destroyed 23:1, 23:13 detail 53:20, 66:6, 174:9, 174:10 details 85:5 determine 166:21, 167:3, 179:15, 185:13, 189:16 determined 132:1, 135:17, 226:17 developing 196:16 development 28:13, 222:13, 222:18, 223:1, 225:9 devices 268:3 didn't 32:13, 37:1, 40:16, 40:17, 43:6, 46:3, 50:5, 51:4,</p>	<p>51:19, 53:8, 53:15, 55:11, 65:15, 67:6, 68:19, 68:21, 71:10, 71:12, 73:19, 74:5, 74:17, 75:19, 76:6, 76:11, 81:10, 81:17, 83:19, 88:20, 89:12, 100:10, 100:13, 105:15, 115:21, 122:11, 133:17, 136:4, 147:20, 147:22, 149:9, 149:14, 149:16, 153:7, 153:9, 157:1, 163:18, 163:20, 163:21, 166:19, 167:1, 167:9, 167:17, 167:18, 167:19, 169:15, 170:15, 171:9, 173:16, 175:10, 177:9, 177:10, 177:11, 177:12, 178:14, 182:14, 184:20, 184:21, 184:22, 185:5, 185:8, 185:20, 190:14, 197:19, 203:20, 207:1, 209:21, 211:8, 211:17, 211:19, 212:6, 212:8, 218:21, 219:1, 223:17, 233:12, 233:18, 233:21, 239:10, 240:4, 240:7, 243:6, 247:7, 247:12, 254:18, 270:3, 270:7 difference 216:15, 236:22 different 17:11, 20:4,</p>
--	--	--	---

<p>25:14, 25:15, 42:6, 51:10, 51:11, 54:6, 58:1, 60:11, 73:6, 96:22, 106:2, 109:6, 123:22, 127:7, 128:22, 133:3, 136:9, 136:10, 175:8, 176:6, 179:8, 180:15, 183:7, 186:7, 186:10, 186:11, 196:14, 196:16, 208:8, 218:11, 218:12, 230:10 differently 21:21, 22:6, 270:8 differing 51:11 difficult 88:16 dineen 4:20, 7:10 diplomatic 218:9 directed 135:14 direction 193:7, 193:8, 227:13, 229:22, 232:3, 234:6, 234:16, 235:19, 237:22, 275:8 directive 257:3, 257:12 directly 71:19, 207:1 director 19:13, 19:19, 19:21, 26:13, 26:22, 27:1, 27:7, 27:18, 31:15, 33:12, 33:13, 33:21, 34:2, 34:6, 35:16, 48:16,</p>	<p>48:19, 48:21, 49:15, 58:9, 58:10, 58:15, 58:17, 58:20, 58:22, 63:6, 64:13, 64:14, 64:16, 252:15, 252:18, 253:1, 253:5, 265:12, 268:16, 268:17, 268:21, 269:6 director's 31:8, 31:10 directors 31:12 disagree 94:1, 95:20, 96:3, 97:20, 98:9, 202:4, 212:1, 223:5, 223:11, 226:6, 266:12 disagreed 93:16, 95:18 disagreement 97:10 disagrees 96:8 disclose 161:10, 183:16 disclosed 207:22, 251:13 disclosure 186:3 discovered 75:22 discovery 16:7, 32:15, 101:20, 104:10, 105:11, 107:4, 108:7, 110:4, 110:22, 111:16, 112:1, 112:22, 113:13, 115:19, 118:21, 119:6, 119:11, 202:3, 220:4, 221:17, 223:13, 224:7,</p>	<p>224:8, 224:9, 224:22 discuss 39:18, 40:10, 44:21, 64:8, 70:10, 77:6, 87:6, 132:9, 133:9, 134:6, 147:12, 147:15, 151:7, 174:1, 236:19, 263:14, 271:22 discussed 9:12, 15:12, 39:12, 40:4, 40:8, 59:8, 59:11, 77:3, 140:17 discussing 175:11 discussion 18:19, 41:3, 42:9, 74:21, 76:20, 95:14, 119:18, 120:21, 155:12, 188:13, 222:14, 246:11, 264:6, 267:2, 267:14, 268:1 discussions 42:16, 42:17, 45:3, 45:4, 74:7, 75:21, 76:14, 153:17, 153:19, 155:5, 155:16, 157:14, 161:10, 162:1, 162:7, 162:15, 166:13, 167:5, 167:13, 169:8, 238:17, 264:8, 264:11 disk 7:2 disposed 23:22, 24:2 disposition 22:22, 23:3</p>	<p>disseminating 225:3 dissemination 18:19, 208:9, 222:15, 225:5 distinction 38:15, 272:9 distinguish 123:15 district 1:1, 1:2, 2:13, 2:14, 7:6, 275:21 division 2:5, 4:5, 22:20, 34:16, 34:18, 34:21, 34:22, 35:2, 35:12, 35:14, 53:1, 53:6, 53:7, 54:10, 54:21, 55:1, 55:6, 79:13 divisions 34:19 document 12:13, 12:14, 12:16, 15:7, 17:11, 43:5, 43:10, 43:11, 43:17, 65:3, 83:6, 87:17, 88:5, 88:17, 88:18, 89:5, 91:20, 94:12, 123:11, 127:8, 127:16, 149:4, 149:13, 151:22, 168:10, 180:16, 181:13, 193:1, 193:5, 193:15, 194:2, 195:7, 196:19, 198:10, 198:12, 198:16, 198:17, 198:20, 198:22, 199:17, 200:8, 200:16, 201:2, 202:1,</p>
---	--	---	---

<p>202:11, 202:17, 205:8, 205:10, 205:16, 205:17, 206:21, 207:13, 212:5, 227:12, 227:16, 227:21, 228:13, 229:9, 229:14, 229:17, 229:21, 230:3, 230:5, 230:7, 231:3, 231:16, 231:21, 234:3, 234:5, 234:8, 234:11, 234:15, 234:18, 235:1, 235:17, 235:21, 236:10, 237:19, 237:21, 238:2, 238:5, 238:8, 239:12, 239:16, 239:19, 240:7, 240:12, 240:19, 241:1, 242:9, 247:21, 248:8, 249:22, 250:8, 250:13, 251:10, 269:20, 270:6 documentation 100:22, 132:21, 232:18, 232:19, 254:18 does 20:11, 22:16, 23:16, 24:19, 31:18, 31:21, 66:2, 94:1, 96:3, 97:20, 98:9, 108:5, 149:17, 150:11, 175:20, 176:7, 176:20, 177:15, 178:7, 182:8, 184:4, 190:19, 200:16, 200:20, 201:18, 210:17, 219:18, 223:7, 224:1, 225:21, 261:13, 262:21,</p>	<p>266:11, 266:12 doesn't 25:19, 95:17, 109:5, 132:18, 136:3, 171:1, 189:7, 189:12, 203:22, 247:13, 249:19, 249:22 doing 136:7, 162:6 doj 37:16, 38:7, 64:4, 65:13, 153:21, 168:7, 170:6, 173:16, 189:2, 190:18, 233:4, 242:17 domain 270:15, 270:17 done 29:7, 30:1, 30:3, 78:17, 79:19, 79:22, 80:1, 84:10, 85:12, 101:11, 106:6, 123:19, 125:2, 125:6, 127:10, 135:15, 136:9, 136:18, 137:9, 138:10, 138:22, 144:10, 146:7, 151:16, 152:2, 205:1, 205:7, 228:12, 263:19 down 192:1, 207:5, 239:10, 244:2 dozens 157:20, 158:4 draft 154:21, 241:2, 241:7, 241:18 drafted 140:16 duly 8:20 during 14:3, 20:17,</p>	<p>49:10, 49:13, 56:1, 59:11, 63:7, 69:7, 69:19, 70:1, 85:7, 85:9, 102:9, 140:3, 140:8, 142:20, 158:15, 160:10, 161:13, 161:20, 162:12, 173:19, 173:21, 174:5, 175:1, 179:1, 184:12, 184:19, 196:15, 230:17, 239:1, 239:12, 242:15, 243:6, 251:22, 258:1, 261:21, 262:12, 262:15, 271:12, 271:18 duties 20:3, 59:20, 60:22, 61:2, 61:5, 61:9, 71:5 <hr/>E<hr/>e-l-i-s-s-a 9:6 e-mailed 217:12 e-mailing 216:10 each 9:22, 31:14, 42:5, 136:2, 228:12, 229:6 earlier 150:20, 186:6 early 45:13, 164:11, 164:12 ease 239:1 easier 80:18 easy 230:18 ecf 17:1, 120:3</p>	<p>edgar 126:16 edification 103:4 effort 20:5, 34:15, 35:5, 35:8 efforts 226:20 egypt 214:17, 215:5, 219:3 eight 269:16, 269:22 either 24:2, 72:11, 76:10, 91:21, 147:20, 234:12 elaborate 53:22, 72:16 electronic 54:4, 127:19, 128:22, 129:2 elissa 1:13, 2:1, 5:2, 7:4, 8:19, 9:4, 274:2 elizabeth 4:3, 4:12, 8:12, 248:2 else 13:15, 15:1, 15:2, 37:12, 38:2, 38:21, 46:10, 69:7, 69:12, 69:17, 71:15, 77:3, 85:17, 102:22, 104:5, 119:17, 134:3, 143:18, 186:1, 194:1, 202:15, 230:4, 231:14, 237:6, 256:5 employed 174:11, 249:1, 275:10 employee 53:14, 54:19</p>
---	---	---	--

<p>employees 29:4, 31:9</p> <p>employment-wise 63:2</p> <p>encompassed 181:15</p> <p>encourage 172:8</p> <p>end 49:8, 66:2, 66:3</p> <p>end-to-end 20:13</p> <p>ending 6:10, 6:13</p> <p>ends 66:3, 273:15</p> <p>engage 153:16, 157:13, 167:13, 169:7</p> <p>engaged 155:4, 161:9, 162:15</p> <p>engaging 155:15, 161:22, 166:12, 167:5, 168:5, 183:10, 184:12</p> <p>enough 14:21</p> <p>ensure 20:18, 62:3, 161:1, 228:19, 233:8</p> <p>enter 14:2, 14:5</p> <p>enterprise 259:18</p> <p>entire 93:11, 108:5, 114:7, 115:2, 116:1, 116:4, 118:10, 118:11, 160:17, 167:8, 207:8, 266:5</p> <p>entirety 44:4, 67:12, 67:21, 68:9,</p>	<p>113:22, 114:12, 118:8</p> <p>entitled 63:13, 265:17</p> <p>entity 218:8</p> <p>entry 233:10, 238:21</p> <p>epa 259:19, 259:20, 260:6</p> <p>eric 19:17, 48:15, 49:16, 58:2, 58:3, 59:4</p> <p>errata 274:7</p> <p>error 221:13</p> <p>es 5:19, 12:14, 65:19, 100:15, 235:14, 265:10</p> <p>es-irm 264:17, 265:7, 265:12, 268:16, 268:17, 268:21, 269:6, 270:15, 270:22, 271:3</p> <p>esquire 3:3, 3:4, 3:5, 3:6, 3:14, 3:15, 3:16, 4:3, 4:11, 4:12</p> <p>et 6:11</p> <p>evaluation 93:2, 265:17</p> <p>eve 211:11</p> <p>even 109:22, 144:4, 184:22</p> <p>evening 211:1, 214:18, 215:6</p> <p>eventually 24:17</p>	<p>ever 9:9, 28:16, 148:8, 148:15, 149:12, 271:22, 272:8, 272:13, 272:17, 272:21, 273:4</p> <p>every 91:20, 197:20, 233:10, 238:12, 240:7, 242:9</p> <p>everybody 14:21, 218:15</p> <p>everything 79:20, 92:11, 212:17, 217:7, 224:3, 251:5, 254:13</p> <p>everything's 9:19</p> <p>evolving 19:6, 51:12, 210:8, 210:13, 210:20, 211:3, 211:13, 212:12, 213:1, 213:15, 217:8, 219:15, 223:10, 225:1, 225:11, 226:14</p> <p>exact 55:6</p> <p>exactly 69:22, 96:19, 139:6, 165:6, 166:21, 193:14, 201:21, 218:16, 256:8</p> <p>examination 5:2, 8:21</p> <p>examined 274:3</p> <p>exception 251:6, 270:16</p> <p>exceptions 154:7</p> <p>excerpts 5:14, 12:16, 41:11, 63:13,</p>	<p>64:22, 116:9, 116:10, 116:15, 116:20, 229:15</p> <p>exchanged 157:22, 158:7</p> <p>exchanges 253:19</p> <p>excuse 27:19, 170:4, 266:12</p> <p>executive 26:12, 26:22, 27:1, 27:7, 31:7, 31:10, 31:12, 31:15, 34:17, 35:6, 35:7, 37:13, 79:11, 96:9, 96:12, 101:3, 126:18, 127:19, 137:5, 150:12, 235:16, 268:2, 268:11, 271:5</p> <p>exemptions 141:8, 255:17</p> <p>exhibits 91:4, 114:10, 191:11, 195:21, 196:17, 206:16, 206:18, 239:8, 240:1, 241:10, 242:7, 242:11, 243:13, 264:21</p> <p>existed 30:6</p> <p>expanded 143:10</p> <p>expedited 21:12</p> <p>expedition 224:3</p> <p>expert 116:20</p> <p>expertise 60:1</p> <p>expires 275:16</p> <p>explain 22:19, 25:11,</p>
---	---	--	--

<p>220:2 explanations 12:1 expressly 103:4, 213:10, 213:12, 214:7 extant 222:16 extended 139:12, 139:16, 139:22, 140:6, 141:10, 142:11, 143:20 extending 140:11 extension 204:1 extent 97:22, 162:5, 177:10, 224:5, 225:8, 260:5, 266:16 extra 246:1</p> <hr/> <p style="text-align: center;">F</p> <hr/> <p>face 93:22 facility 24:16 fact 38:12, 149:11, 163:19, 166:14, 170:7, 183:16, 186:3, 217:6, 224:15 fair 10:17, 11:3, 52:14, 226:4, 271:8, 271:9 fairly 12:20 fall 45:13 familiar 102:7, 153:22, 154:3, 263:8 far 26:8, 61:1,</p>	<p>138:7, 181:15, 213:18 fashion 21:20 fear 224:19 february 17:1, 28:10, 28:12, 28:17, 78:2, 144:6, 168:17, 169:2, 169:16, 170:9, 221:1 federal 3:18, 103:17, 185:13 felt 65:14 few 11:15, 28:17, 57:17, 82:6, 251:18 fifth 12:15 file 133:14, 150:1, 150:2, 150:3, 150:4, 150:5, 150:7, 150:8, 150:21 filed 105:14, 105:18, 120:16, 121:12, 154:10, 155:1, 161:8, 259:18 files 25:18, 129:12, 130:3, 131:6, 131:15, 132:1, 132:7, 133:22, 134:14, 135:18, 148:18 filing 154:19, 172:14 film 214:20, 215:8 final 228:14, 228:15,</p>	<p>239:15, 241:15 financial 275:11 find 132:22, 140:3, 141:8, 141:12, 176:3, 184:1, 207:5 finding 266:13 fine 17:18, 90:10, 90:11 finish 10:2, 10:7, 188:20 finished 106:21 finnegan 261:9 finney 6:14, 35:15, 35:18, 36:19, 37:2, 37:5, 37:7, 45:5, 45:10, 68:6, 68:14, 68:17, 68:22, 76:15, 79:4, 79:8, 101:10, 107:11, 107:12, 113:5, 128:13, 134:5, 134:8, 137:4, 140:20, 146:10, 146:19, 147:17, 148:3, 148:9, 148:20, 148:22, 149:3, 192:3, 192:10, 192:13, 233:16, 233:17, 246:14, 247:12, 248:9, 248:13, 249:8, 249:19, 249:21, 250:3 finney's 68:7, 107:6, 107:9, 113:7, 113:9, 150:11,</p>	<p>150:16, 192:7 first 28:8, 29:1, 32:1, 32:5, 32:8, 79:19, 86:20, 117:10, 196:19, 200:8, 204:4, 207:17, 207:18, 238:6, 248:22, 260:18, 267:16, 269:15, 269:22, 270:11 first-in 183:22 first-out 183:22 fishing 224:2 fit 89:12, 219:18 fits 219:11 five 82:13 five-page 229:17, 237:18 flip 92:10 floor 263:4 focus 71:10, 71:12, 74:17, 76:6, 76:12, 125:20, 127:9, 138:13, 162:8, 163:3, 181:17, 181:18 focused 74:18, 76:7, 210:5, 227:2 focusing 86:14, 162:12, 169:3 folders 167:9 following 177:4, 177:20 follows 8:20</p>
--	--	--	---

<p>foregoing 274:4, 275:3, 275:4 foreign 29:8, 30:18, 31:6 forget 120:13, 243:7 form 24:11, 25:8, 45:22, 50:19, 60:5, 73:3, 77:18, 81:5, 81:6, 81:8, 81:11, 81:16, 84:16, 93:17, 98:20, 99:19, 124:15, 131:16, 134:1, 134:16, 137:1, 138:17, 144:7, 149:7, 151:17, 152:4, 152:14, 156:9, 156:12, 156:17, 156:22, 157:5, 158:10, 158:22, 161:15, 164:16, 172:1, 174:4, 176:1, 177:6, 177:22, 178:13, 179:19, 191:14, 198:3, 200:22, 202:18, 205:12, 210:4, 211:5, 211:16, 212:2, 212:14, 216:6, 228:14, 228:15, 251:2, 251:16, 256:10, 259:6, 259:14, 261:3, 263:17, 263:22, 270:19 former 17:7, 18:8, 34:12, 46:15, 46:17 forms 99:3, 109:7</p>	<p>formulation 181:10 forth 79:3, 153:20, 196:16, 228:2, 230:10, 230:16, 238:10, 238:13 forward 187:2 found 78:7, 98:16, 124:3, 133:1, 133:6, 137:20, 152:20, 153:1, 224:20 foundation 91:11, 91:16, 135:2, 163:1, 190:6, 191:2, 191:20, 216:7, 233:15, 250:11, 250:16 four 21:9, 22:3, 37:22, 123:20, 133:5, 133:7, 137:20, 137:21, 137:22, 235:14 fourteen 220:19 fourth 12:14, 139:8, 192:1, 195:7, 244:10 frame 41:5, 53:2, 53:3, 71:3, 72:12, 73:13, 129:10, 143:10, 143:11, 143:13, 158:12, 159:1, 160:10, 160:12, 161:21, 163:3, 164:6, 171:13, 182:5, 184:12, 184:19, 226:21, 251:22, 258:1 frames 41:2, 42:20</p>	<p>frcp 5:9 free-lance 223:20 freedom 20:5, 20:11, 20:14 friday 36:10, 39:5, 66:19, 68:17, 69:4, 70:11, 82:13, 83:8, 83:17, 84:22, 85:15, 119:19, 236:15, 239:20, 239:21, 240:12, 240:16, 240:19, 241:8, 241:19 front 11:15, 11:19, 12:21, 13:16, 227:5, 242:7 full 65:16, 139:8 fully 224:12 functioning 62:4 functions 26:16 further 207:5, 257:4, 257:13, 273:15</p> <hr/> <p style="text-align: center;">G</p> <hr/> <p>g-u-i-t-r-o-n 9:7 games 92:8 gap 65:14 gather 191:15 gave 92:9, 92:13, 250:4 gene 42:22, 43:22,</p>	<p>44:4, 47:8, 55:8, 67:9, 67:16, 71:5, 101:13, 101:16, 107:8, 115:22, 117:5, 270:5 gene's 116:9 general 61:5, 61:8, 83:22, 97:19, 136:6, 223:20, 225:14, 230:19, 264:3 generally 20:2, 105:19, 197:21, 231:9 generate 75:3, 131:10, 132:15 generated 132:13 geographic 22:13 geographically 22:7, 22:10 get 13:6, 13:16, 25:22, 95:12, 133:11, 219:17, 243:3, 243:9 gets 136:2, 183:20 give 10:10, 41:21, 74:22, 141:12, 145:7, 221:11, 246:1 given 47:7, 165:1, 168:22, 274:6, 275:5 global 58:4, 60:14, 60:18, 62:9, 160:5 go 9:11, 9:13,</p>
---	--	--	---

<p>10:3, 10:13, 15:13, 24:10, 26:8, 26:9, 27:17, 31:22, 32:8, 43:15, 51:9, 57:10, 63:1, 66:14, 77:12, 77:13, 81:20, 86:2, 87:17, 88:4, 89:20, 90:12, 90:13, 92:6, 92:20, 94:19, 106:11, 122:18, 125:11, 164:19, 197:19, 208:12, 213:18, 229:2, 233:7, 239:10, 240:4, 245:6, 247:12, 249:17, 267:6, 269:2 goes 32:3, 219:14, 221:22, 266:16 going 10:14, 14:1, 17:5, 18:7, 26:8, 40:21, 54:18, 57:11, 75:1, 79:2, 81:22, 88:6, 90:2, 90:16, 115:1, 122:3, 122:18, 125:13, 141:21, 149:8, 153:20, 156:4, 163:12, 164:8, 164:22, 165:1, 172:20, 173:3, 183:21, 193:11, 200:4, 200:18, 208:8, 208:14, 208:20, 208:21, 213:3, 218:13, 232:22, 243:3, 243:5, 244:22, 259:17, 273:7, 273:16</p>	<p>gone 84:1, 120:22, 136:8 good 9:1, 125:10 got 19:10, 71:17, 139:4, 178:1, 221:10, 221:11 gov 71:11, 71:13, 108:21, 109:1, 109:8, 129:22, 203:6, 203:13, 204:20, 263:21, 264:14, 270:17 government 159:8, 223:18 government's 213:7, 214:9 grafeld 159:22, 162:18 grafeld's 160:13 granted 224:22 great 49:14, 246:3 greater 260:4 grosso 4:12, 8:12, 59:14, 62:19, 69:11, 188:17, 248:2 group 216:1, 216:18, 217:14, 217:17, 218:19 groups 219:1 growing 159:6, 159:15, 160:7, 160:8, 163:6, 183:8 guess 24:8, 49:4, 61:7, 67:19,</p>	<p>139:11, 149:8, 164:18, 247:11, 260:19, 262:19 guidance 60:1, 60:3, 60:7, 60:10, 61:16, 84:5, 84:9, 96:14 guitron 1:13, 2:1, 5:2, 7:4, 8:19, 9:4, 9:6, 274:2 <hr/>H<hr/>hackett 34:4, 44:22, 45:10, 45:16, 45:19, 46:22, 48:4, 48:7, 58:19, 58:20, 62:15, 64:11, 74:22, 78:15, 130:5, 151:7, 159:17, 162:19, 192:8, 192:14, 245:15, 247:11 hackett's 46:5, 65:6, 66:22, 67:20, 67:21, 75:10, 75:13, 107:8, 118:4, 118:7, 120:10, 122:6, 130:14, 140:14, 141:3, 141:4, 141:9, 141:19, 142:3, 142:10, 143:18, 144:16, 144:18 hadn't 166:20 hand 12:19, 214:11, 275:12 handle 21:11, 24:20, 271:7 handles 21:11, 21:13</p>	<p>handling 77:10, 160:17, 160:22 happened 136:1, 181:14, 212:16, 217:11, 218:11, 218:16, 224:17, 247:16 happy 11:11, 91:19, 201:19, 219:13, 223:2, 266:20 hard 123:15, 164:4, 164:14, 247:8 has 17:12, 21:19, 31:14, 44:12, 48:19, 57:17, 87:21, 89:10, 89:14, 91:17, 91:18, 91:21, 97:11, 184:5, 185:11, 188:9, 194:9, 198:8, 201:16, 203:19, 203:22, 220:4, 249:4, 249:19, 250:13, 261:11 hasn't 106:15 haven't 92:16, 106:21, 142:13 having 8:20, 17:11, 23:1, 42:4, 71:7, 137:15, 181:10, 247:2, 247:6, 247:8 hdr@clintonemail 75:17, 199:7, 203:1 he's 19:19, 48:12, 48:16, 48:21, 53:14, 54:10, 55:9, 119:14,</p>
--	--	--	--

<p>174:9, 174:10, 248:15, 249:1, 249:10, 249:13 head 53:20, 54:1, 76:9, 80:9, 88:21, 101:7, 102:12, 252:3, 252:6 heading 223:15 heads 10:14, 74:22 hear 87:19, 105:15, 159:10, 206:17, 219:13 hearing 247:8 heather 251:20, 253:20, 258:14 held 2:2, 42:9, 95:14, 120:21, 155:12, 246:11, 267:14 help 33:17, 61:14, 65:15, 193:9, 194:2 helped 83:12, 173:18 helpful 117:3, 224:5, 228:4, 230:17 helping 62:3 her 14:6, 32:20, 32:22, 41:6, 50:16, 53:5, 55:3, 55:6, 74:10, 87:16, 87:22, 88:4, 106:6, 106:14, 106:18, 108:12, 108:21, 109:1,</p>	<p>109:2, 109:4, 109:7, 109:8, 115:2, 158:15, 159:20, 161:13, 161:19, 162:5, 164:4, 164:14, 165:12, 166:8, 166:15, 167:15, 168:18, 169:11, 171:8, 176:13, 184:9, 185:14, 199:7, 202:7, 203:1, 203:6, 203:22, 204:6, 204:12, 204:15, 214:13, 215:12, 215:20, 216:11, 216:21, 217:6, 217:13, 219:22, 220:5, 222:19, 222:20, 225:7, 243:13, 260:7, 266:20, 266:21, 267:5, 268:5, 270:12, 271:12 here 7:2, 9:19, 9:20, 11:16, 13:9, 13:14, 15:19, 16:5, 16:9, 16:15, 17:2, 18:21, 19:3, 19:8, 33:16, 35:18, 36:3, 36:12, 37:2, 37:3, 37:12, 38:17, 38:21, 41:8, 46:12, 47:15, 48:1, 50:2, 53:16, 56:20, 59:15, 62:21, 64:2, 65:22, 66:11, 83:13, 86:2, 89:1, 89:2, 92:14, 95:13, 103:8, 105:1, 109:16,</p>	<p>113:22, 115:14, 139:5, 139:15, 139:21, 148:7, 148:13, 149:11, 151:1, 151:4, 157:10, 157:18, 170:19, 177:14, 189:10, 189:22, 190:11, 191:15, 193:6, 194:5, 195:20, 196:3, 197:20, 198:2, 202:19, 210:1, 210:15, 211:13, 212:11, 224:1, 225:17, 226:19, 227:15, 229:10, 231:17, 235:6, 235:10, 237:11, 241:22, 242:21, 248:5, 251:12, 255:8, 255:13, 256:2, 263:13, 266:8, 271:1 hereby 274:2, 275:3 hereunto 275:12 herself 178:15 hide 214:3 high 210:16, 210:17 highly 202:2 hill 75:2, 174:9, 174:10, 179:12, 180:6, 180:21, 182:20, 186:16, 269:16 hillary 16:7, 32:15, 70:8, 72:8, 72:9, 76:11, 101:21, 104:10, 105:12, 107:4,</p>	<p>108:7, 110:4, 110:22, 111:16, 112:2, 113:1, 113:14, 115:20, 118:22, 119:7, 119:12, 193:12, 260:3 him 37:8, 50:6, 51:19, 70:2, 70:5, 74:13, 74:14, 76:14, 77:1, 82:14, 85:1, 85:16, 132:10, 153:9, 174:1, 174:14, 175:2, 175:9, 214:19, 215:6, 236:17, 236:21, 249:12, 269:21 his 19:18, 36:1, 36:5, 39:2, 41:5, 42:17, 42:19, 51:15, 53:18, 54:8, 54:12, 55:14, 55:21, 56:6, 59:19, 60:8, 60:22, 61:17, 65:16, 68:9, 70:12, 70:13, 72:4, 73:8, 76:9, 76:20, 83:19, 83:22, 84:3, 84:20, 85:1, 101:10, 111:21, 113:11, 114:6, 116:1, 116:3, 118:11, 130:5, 143:20, 151:8, 192:9, 192:14, 202:3, 245:15, 250:4, 268:2, 269:1, 270:9, 271:22, 272:14 hoc 136:21</p>
---	---	---	---

<p>hold 28:4, 49:17, 94:5, 185:10, 224:2 holidays 167:11 home 28:15 honest 183:15, 184:14 hour 128:10, 172:21 hours 157:6, 224:16, 232:17, 232:18, 242:13 house 251:21, 252:8, 253:16, 253:19, 254:3, 254:7, 254:11, 254:16, 254:20 how 11:18, 21:8, 25:9, 27:5, 27:10, 27:14, 27:22, 28:3, 28:11, 29:12, 30:19, 31:2, 31:4, 33:20, 36:15, 39:8, 44:12, 44:18, 48:9, 48:12, 48:19, 49:10, 52:21, 53:12, 54:21, 55:8, 56:14, 56:22, 59:6, 62:17, 63:5, 64:17, 65:9, 68:6, 73:21, 78:10, 79:14, 93:19, 103:21, 110:1, 111:13, 112:19, 113:10, 114:20, 117:15, 117:21, 124:1, 128:6, 128:11, 130:2,</p>	<p>132:18, 135:11, 136:17, 157:2, 186:9, 190:12, 191:16, 194:12, 195:19, 196:5, 201:18, 201:21, 213:8, 219:10, 219:18, 220:3, 230:14, 232:16, 232:20, 238:8, 241:14, 242:10, 251:4, 252:5, 254:9, 256:17, 256:18, 264:4, 264:5 huma 104:12, 110:15, 134:14, 135:19, 187:5, 188:2, 230:20 human 26:17 hundred 114:1</p> <hr/> <p style="text-align: center;">I</p> <hr/> <p>i'll 9:11, 12:19, 14:2, 14:16, 60:6, 84:21, 98:21, 106:11, 166:22, 201:20, 202:21, 206:19, 223:18, 256:22 i've 30:3, 139:4, 168:22, 221:9 identifiable 260:2, 260:7 identification 14:14, 15:5, 42:11, 90:20, 198:7, 246:10 identified 22:15, 80:11, 81:15, 101:22, 124:10, 133:4, 137:21, 144:21,</p>	<p>181:20, 198:16, 202:3, 204:1, 210:2, 221:4, 252:15, 266:17 identifies 201:6 identify 21:10, 111:7, 112:7, 117:2, 121:14, 128:15, 130:18, 143:12, 159:13, 237:14 identifying 15:11 identity 268:5 ig 214:7 immediate 126:15, 157:22, 158:6 imperfect 184:3 important 9:22, 10:19, 249:18 inaccurate 268:13, 269:14 inc 1:4, 3:7, 7:5 include 108:5, 114:11, 128:19, 143:21, 191:7, 191:13, 207:20, 228:3, 228:6, 228:9, 228:11, 230:11, 230:15, 231:11 included 127:20, 148:17, 205:4, 228:7, 230:12, 231:4, 258:20 includes 199:5, 204:6 including 80:3, 105:14, 105:18, 157:21,</p>	<p>158:6, 187:5 incorrect 98:22 indeed 174:1 index 153:22, 154:1, 154:6, 154:15, 154:18, 154:21, 180:18 indexing 127:21 indicate 164:18 individual 160:6, 178:9, 186:19, 265:13 individuals 37:16, 65:10, 65:21, 81:14, 188:7, 233:12 info 169:1 inform 151:15, 152:1, 156:6, 161:21, 162:16, 163:8, 163:14, 163:19, 166:11, 167:20, 171:10, 172:16, 178:22, 189:2 information 19:14, 20:6, 20:8, 20:11, 20:14, 26:18, 38:20, 57:21, 58:5, 58:7, 58:16, 59:6, 60:14, 60:20, 61:14, 62:9, 62:18, 65:4, 71:17, 74:8, 89:15, 130:7, 133:4, 134:4, 139:21, 140:3, 160:5, 171:15, 184:15, 189:9, 190:2, 190:3,</p>
--	--	---	---

<p>190:10, 194:1, 196:2, 196:6, 197:1, 197:12, 197:18, 198:1, 209:22, 211:6, 216:8, 216:9, 217:4, 217:10, 218:1, 219:6, 222:13, 228:19, 228:22, 229:3, 229:9, 230:13, 230:15, 231:8, 232:12, 232:14, 233:2, 233:6, 233:9, 233:11, 234:17, 235:2, 236:11, 237:4, 237:7, 238:16, 239:9, 240:3, 240:11, 241:1, 243:3, 243:9, 243:12, 243:22, 244:20, 245:7, 253:2, 255:10, 264:12, 271:5 informed 135:5, 135:7, 135:11, 156:18, 170:7, 174:2, 174:16, 175:3, 175:16, 215:20, 216:17 informing 155:3, 214:18, 215:6, 215:12, 268:2 infrastructure 267:7, 269:3 initial 16:7, 32:15, 101:19, 104:9, 105:11, 106:6, 107:4, 108:7, 110:3, 110:21, 111:16, 112:1, 112:22, 113:13, 115:19, 118:21, 119:11, 124:12,</p>	<p>125:6 initialed 148:9 initially 143:9, 150:7, 206:10, 206:22, 207:15, 217:5, 248:22 initiate 127:12 inquiry 254:2 insight 61:16 inspector 223:20, 225:14 instance 134:8 institute 29:8, 30:18, 31:6, 259:18 instruct 10:12, 214:13, 220:5 instructed 65:20 instructing 32:19, 176:13, 202:7, 219:22 instruction 11:7, 97:6, 215:11 intelligence 26:13, 27:3, 27:19, 27:20, 216:21 intent 268:2 interacted 263:3 interest 275:11 internally 259:11 internet 268:7 interpret 257:18, 259:8</p>	<p>interpretation 226:7, 258:6, 260:9 interpreted 259:15 interpreting 261:7 interrelated 87:15, 123:17, 124:5 interrogatories 104:18, 104:21, 105:9, 105:13, 105:17, 105:21, 105:22, 221:22 interrogatory 105:2, 106:1, 130:7, 130:9, 130:10 interrupt 106:19 interrupting 43:14 into 14:6, 89:12, 136:8, 223:13, 223:20, 224:9 investigation 73:16 invited 192:4, 192:10, 247:11 involved 35:8, 50:15, 81:14, 140:17, 178:10, 186:15, 186:20, 187:1, 219:1 involvement 25:5, 50:7, 83:19, 84:4, 85:2, 227:22 involving 61:2, 93:3 ips 19:21, 19:22, 20:3, 21:2, 21:20, 22:1,</p>	<p>22:16, 25:4, 28:7, 28:9, 28:12, 28:16, 31:18, 33:6, 33:13, 33:21, 34:2, 34:6, 34:8, 34:11, 34:20, 48:16, 48:20, 49:16, 49:19, 53:14, 53:19, 54:7, 54:9, 54:12, 55:1, 55:17, 58:20, 58:22, 61:18, 62:2, 62:13, 64:16, 78:4, 78:18, 78:20, 83:22, 101:2, 128:13, 135:8, 135:9, 136:11, 137:13, 148:9, 148:16, 148:17, 149:5, 149:13, 150:8, 150:9, 159:18, 160:14, 160:17, 161:1, 180:10, 252:15, 252:18, 256:5, 257:4, 257:12, 258:5, 261:4 irm 261:11, 265:10 isn't 189:9, 190:2, 190:10, 209:22, 215:16, 215:19 issue 15:16, 32:8, 39:16, 77:16, 77:22, 78:1, 86:15, 86:21, 87:7, 87:14, 88:1, 88:12, 93:9, 96:5, 97:14, 98:17, 179:2, 183:3, 209:5, 209:10,</p>
---	--	--	---

<p>213:21, 231:1, 273:6 issued 102:11, 102:15, 204:12, 209:1, 209:16, 211:1, 212:10, 266:4, 266:5 issues 40:7, 60:11, 60:12, 60:18, 183:12, 271:11 it-related 271:11 item 15:15, 16:1, 17:6, 19:5, 103:10 iterations 228:3 iteratively 136:9 its 1:12, 113:22, 118:8, 145:21, 202:1, 228:14, 228:15, 253:16, 256:8, 261:11, 261:16, 275:11 itself 223:20, 260:1</p>	<p>27:12, 27:13, 35:2, 35:10, 35:14, 58:10, 93:5, 93:13, 94:2, 94:16, 95:22, 97:21, 98:8, 144:5, 213:11, 221:19, 226:5 jaramillo 126:16 jeremy 4:20, 7:10 job 1:20, 19:11, 263:5 john 34:4, 45:16, 46:22, 58:19, 58:20, 62:15, 64:11, 107:8, 159:17, 245:15, 247:10, 264:18, 265:8, 266:1 joint 16:19, 17:1, 34:15, 35:5, 35:8, 120:2, 120:4, 120:9, 120:14, 120:15, 121:11, 121:20, 121:21, 122:5, 122:15, 154:10, 154:22, 155:3, 161:8, 162:11 jonathan 261:9 jonathon 36:7, 46:10, 65:17, 79:6, 80:3, 82:9, 100:12, 101:9, 107:7, 113:10, 113:15, 114:18, 128:1, 128:6, 128:7, 129:21, 138:19, 205:3, 233:17, 233:22,</p>	<p>236:13, 263:14, 264:10 josh 8:2, 13:2, 14:1, 221:16 joshua 3:14 judge 32:1, 201:12, 202:2, 213:22, 223:6, 224:15, 224:21, 225:21, 226:2, 226:4 judicial 1:4, 3:7, 6:3, 6:5, 7:4, 7:17, 7:19, 7:21, 16:12, 81:14, 89:8, 89:16, 91:22, 92:4, 100:16, 109:13, 120:5, 122:21, 123:5, 124:11, 124:20, 125:22, 126:2, 126:21, 127:3, 137:10, 138:1, 151:15, 151:21, 152:1, 153:17, 153:21, 155:16, 157:14, 161:10, 161:11, 162:14, 162:15, 166:12, 167:13, 178:22, 182:6, 183:10, 194:10, 208:1, 223:19, 224:1, 224:2, 224:4, 225:8, 225:13, 250:21 july 126:18, 130:15, 159:4, 161:7, 163:4, 164:11, 164:12, 187:15 june 1:15, 7:8, 49:6, 58:13, 62:18, 66:4,</p>	<p>66:20, 68:17, 69:4, 70:1, 71:6, 72:3, 107:22, 108:19, 113:16, 115:7, 117:6, 126:15, 126:16, 126:17, 159:4, 163:4, 178:19, 187:14, 220:20, 275:13 justice 2:4, 3:17, 4:4, 7:12, 8:3, 8:7, 8:9, 69:14, 156:7, 156:19, 163:9, 169:20, 170:2, 170:12, 171:5, 171:11, 172:17, 173:13, 174:2, 174:15, 175:3, 175:17</p>
J			
<p>jacob 104:14, 111:20, 134:15, 135:19, 187:5, 188:3, 199:6, 230:21 jake 199:2 jamie 39:3, 39:4, 65:14, 73:1, 73:2, 82:9, 119:13, 173:11, 173:15 january 26:9, 26:11,</p>			<p style="text-align: center;">K</p> <p>karen 47:7, 261:8 keep 136:22 kennedy 158:17 kevin 56:22 kind 23:7, 51:12, 76:10, 87:15, 123:15, 124:4, 210:19, 243:7, 266:21 knew 40:13, 40:14, 52:4, 52:12, 158:13, 162:4, 166:2, 166:6, 167:14, 169:9, 170:12, 171:5, 171:6, 183:7, 183:12, 225:3, 226:21, 230:8, 231:10</p>

<p>knowledge 5:14, 12:16, 32:22, 41:5, 41:11, 42:17, 42:19, 51:1, 52:17, 63:14, 65:1, 65:16, 72:2, 72:4, 89:15, 98:4, 98:6, 134:11, 162:19, 163:15, 165:20, 170:20, 178:11, 184:4, 191:15, 229:15, 262:17, 262:21, 264:13</p> <p>known 134:5, 170:16, 170:17</p> <p>knows 171:17, 174:15, 189:6, 214:19, 215:7</p> <hr/> <p style="text-align: center;">L</p> <hr/> <p>lack 91:10, 135:1, 162:22, 190:5, 191:1, 191:19, 216:9, 233:14, 250:10, 250:16</p> <p>lamberth 202:2, 224:15, 224:21, 225:21, 226:3</p> <p>lamberth's 32:1, 201:12, 213:22, 223:6, 226:5</p> <p>lang 47:7</p> <p>large 218:8</p> <p>last 12:17, 19:5, 21:15, 28:17, 29:21, 36:9, 36:16, 36:22,</p>	<p>39:5, 47:20, 48:22, 66:19, 68:17, 69:4, 70:11, 80:19, 82:13, 83:8, 83:16, 84:22, 85:15, 96:20, 99:15, 100:1, 103:10, 119:19, 130:8, 138:10, 196:20, 198:21, 200:11, 200:15, 203:21, 205:20, 232:9, 234:12, 235:22, 236:2, 236:5, 236:6, 236:15, 239:20, 239:21, 247:9, 252:13, 272:6</p> <p>late 53:4, 192:6, 192:12, 195:8, 195:13, 244:3, 244:6, 245:12</p> <p>later 26:1, 72:6, 138:21, 178:15, 207:3, 217:6</p> <p>latter 65:5</p> <p>lauren 3:4, 7:18</p> <p>lawrence 56:14, 56:15, 56:19</p> <p>lawsuit 259:19</p> <p>lawyer 188:16</p> <p>lawyers 69:13, 137:13, 170:12, 188:13, 188:14, 193:2, 227:13, 227:14, 227:21, 232:3, 232:5, 234:6, 234:7, 235:18, 235:20, 236:4,</p>	<p>237:22, 238:1, 238:5</p> <p>learn 269:15</p> <p>learned 40:20, 74:8, 261:10, 269:18, 269:21</p> <p>least 182:20</p> <p>leaves 25:20</p> <p>left 27:16, 34:10, 58:13, 62:18, 63:3</p> <p>legal 44:8, 55:10, 55:17, 72:19, 136:11, 176:12, 176:18</p> <p>leisure 92:10</p> <p>length 23:9</p> <p>leona 27:9, 31:16</p> <p>let 10:2, 10:7, 10:20, 11:11, 25:3, 26:4, 38:19, 50:13, 63:22, 73:5, 81:2, 84:21, 97:18, 106:20, 119:9, 138:6, 141:8, 141:18, 145:18, 158:3, 168:10, 168:14, 194:6, 194:8, 197:7, 248:18, 252:21, 266:20</p> <p>let's 36:9, 41:7, 63:9, 138:13, 139:4, 162:8, 173:2, 181:6, 181:17, 185:9</p>	<p>letter 16:12, 122:21, 123:5, 123:7, 123:12, 123:18, 124:7, 145:16, 147:9, 151:15, 151:20, 153:15, 199:22, 200:1</p> <p>letters 103:15, 103:21, 121:1, 199:22</p> <p>letting 217:13</p> <p>level 210:16, 210:17</p> <p>liaison 251:21, 252:8</p> <p>libya 214:20, 215:7, 218:19</p> <p>lieberman 4:11, 8:10, 188:18</p> <p>life 23:7, 23:12, 23:21</p> <p>light 222:18, 248:10</p> <p>like 41:7, 49:4, 65:14, 72:15, 88:16, 96:12, 173:1, 183:18, 199:1, 201:1, 211:20, 214:12, 233:17, 260:6</p> <p>likely 260:4</p> <p>limit 223:7, 225:21</p> <p>limitation 226:4</p> <p>limited 201:13, 272:3, 272:7</p> <p>line 240:4, 240:5</p> <p>line-by-line 241:12</p>
---	--	---	--

<p>lines 20:4 linked 172:12 list 37:15, 80:10, 92:3, 108:5, 270:16 listed 65:7, 87:1, 93:13, 94:3, 99:1, 118:3, 118:19 literally 17:22 litigation 16:13, 55:18, 84:1, 106:3, 122:22, 123:6, 136:8, 138:2, 153:13, 172:13 little 13:17, 22:19, 26:1, 72:6, 83:18, 83:22, 97:18, 136:21, 270:4 lizzy 59:14, 62:19, 69:11, 188:15, 188:17 locate 129:15, 149:18 located 125:5, 132:19, 133:12, 133:20, 134:12, 136:19, 147:6, 201:22 location 17:16, 23:20 long 25:9, 27:5, 27:10, 27:14, 27:22, 29:12, 31:2, 36:15, 39:8, 44:12, 48:19, 54:21, 128:6, 136:1,</p>	<p>157:2, 194:12, 232:16, 232:20, 242:10 longer 23:17, 143:11, 257:13 look 33:22, 41:7, 47:9, 83:5, 94:20, 102:9, 116:7, 118:15, 122:3, 128:9, 140:2, 140:8, 140:13, 142:17, 150:1, 155:6, 167:1, 191:8, 194:13, 195:18, 204:3, 206:12, 206:14, 206:15, 212:4, 212:6, 212:17, 223:12, 225:17, 231:19, 232:16, 235:3, 237:13, 240:7, 258:22 looked 42:22, 78:15, 80:3, 88:3, 100:8, 114:2, 114:7, 127:7, 133:2, 149:21, 150:21, 154:16, 166:20, 178:17, 197:21, 212:7, 212:18, 228:21, 232:13, 232:21, 234:19 looking 17:12, 40:18, 41:9, 41:10, 43:9, 43:11, 78:6, 83:2, 95:1, 95:2, 99:4, 99:11, 111:4, 111:8, 112:9, 117:4, 121:5, 121:15, 128:12, 139:1,</p>	<p>148:1, 157:9, 165:6, 167:9, 187:16, 200:14, 221:16, 222:7, 232:17, 232:18, 248:7, 265:1, 267:10 looks 199:1 lot 114:2, 123:22, 139:4, 183:20, 211:6, 211:7, 212:3, 216:8, 216:13, 217:3, 240:8, 270:3 lunch 92:19, 121:8, 125:10</p> <hr/> <p style="text-align: center;">M</p> <hr/> <p>made 45:10, 94:13, 95:21, 96:5, 164:12, 167:7, 217:1, 241:7, 241:18, 250:14, 250:20, 258:10, 266:13, 269:6, 270:11 make 10:2, 17:21, 38:15, 42:4, 42:7, 70:4, 91:19, 91:20, 106:12, 137:16, 151:13, 160:16, 173:9, 198:15, 231:2, 272:10 making 50:16, 193:21, 227:20, 244:16 manage 20:13, 34:11 management 20:7, 22:17, 26:12, 29:3, 30:15, 58:13,</p>	<p>59:22, 60:17, 61:5, 61:8, 61:21, 94:13, 97:7, 158:18, 159:6, 159:14, 163:5, 265:18, 271:6 managing 20:5, 20:10 mandatory 29:18, 30:22, 31:1 many 11:19, 21:8, 28:3, 60:11, 79:14, 103:21, 132:18, 210:21, 212:15, 238:8 march 58:6, 58:18, 58:21, 61:18, 62:1, 62:6, 62:11, 62:14, 64:15, 253:3, 253:10, 253:11 margaret 159:22 mark 14:11, 42:5, 89:21, 89:22, 246:5 marked 14:13, 14:17, 15:4, 18:2, 41:15, 42:11, 80:13, 80:15, 90:20, 111:5, 112:6, 114:10, 117:1, 118:12, 191:11, 196:12, 198:6, 198:8, 200:9, 228:1, 229:5, 230:5, 234:18, 239:7, 240:1, 241:9, 244:6, 246:9, 248:8 mask 268:5</p>
--	---	---	---

<p>massachusetts 4:6 material 89:4, 195:22, 200:18, 240:9, 255:18 materials 47:9, 47:18, 65:12, 197:4, 257:10, 271:18 math 49:1, 49:3, 49:7 matter 7:4, 16:9, 16:22, 25:13, 225:22 matters 15:12, 25:20, 45:21, 108:15 may 10:4, 10:8, 10:9, 10:13, 11:5, 12:2, 17:10, 21:17, 45:5, 45:9, 78:1, 111:3, 126:6, 128:21, 129:5, 129:9, 129:11, 134:3, 134:5, 134:11, 176:8, 203:9, 224:4, 242:20, 258:4, 265:16, 266:4, 266:5, 267:2 maybe 77:19, 140:3, 238:7, 240:16 mean 22:10, 23:6, 23:15, 23:16, 31:22, 32:13, 32:21, 38:5, 39:15, 50:10, 50:12, 61:8, 61:11, 87:16, 92:8, 93:20,</p>	<p>93:21, 109:5, 124:4, 124:16, 140:5, 150:4, 172:6, 177:7, 193:8, 194:5, 197:21, 200:17, 202:6, 203:20, 205:13, 207:10, 210:17, 225:17, 225:21, 240:13, 242:8, 255:16, 262:5, 262:22, 269:13, 272:6 meaning 151:3, 205:15 means 200:18, 201:16 meant 151:9, 152:9 media 17:8, 18:9, 18:11, 18:14, 259:21 meet 35:17, 36:1, 37:1, 37:5, 37:8, 38:2, 38:22, 39:4, 39:8, 46:11, 46:16 meeting 85:9, 192:4, 192:10, 195:10, 195:15, 245:15, 245:19, 246:15, 246:20, 246:22, 247:2, 247:4, 247:6, 247:12, 247:13, 247:14, 247:15, 247:18, 248:10, 249:20, 250:1 mega 21:13, 21:16 members 36:5, 132:2, 132:3, 157:21, 158:6, 264:18,</p>	<p>265:7, 266:1 memo 101:9, 128:12, 135:13, 146:18, 147:17, 148:3, 148:8, 148:15, 148:17, 148:19, 149:10, 149:12, 149:15, 149:20, 150:18, 151:10, 152:10, 153:9, 156:5, 156:8, 156:21 memorandum 103:11, 103:13, 146:10, 157:3 memorandums 103:1 memorialize 131:11, 136:17 memorialized 140:10 memorized 142:13 memory 87:21, 122:9, 195:3, 230:9, 240:9 memos 78:16, 79:3 mention 207:1 mentioned 11:5, 100:13, 107:10, 163:4, 208:20 merely 224:19 met 37:17, 38:19, 85:16 michael 3:6, 4:11, 7:22, 8:10, 188:17 mid 97:6 middle 9:6, 63:17</p>	<p>midway 49:4 might 23:10, 23:11, 25:16, 36:9, 39:21, 40:19, 42:7, 65:16, 70:14, 124:6, 155:10, 184:3, 224:20 mike 188:15 mills 6:11, 104:13, 110:8, 110:12, 110:19, 111:2, 111:14, 129:22, 130:4, 131:6, 134:14, 135:19, 164:13, 164:18, 187:5, 188:2, 199:2, 199:8, 203:6, 203:13, 203:16, 204:6, 204:10, 204:15, 204:20, 205:4, 230:21 mind 83:3 mine 41:15 minister 214:17, 215:4, 219:3, 219:7 minute 29:14, 29:15, 66:16, 70:1, 208:11, 208:12 minutes 31:3, 36:17, 39:10, 82:13 miscellaneous 6:9, 89:12 mischaracterize 174:20 mischaracterizes 68:21, 174:19 missed 137:17</p>
---	--	---	---

<p>missing 264:21</p> <p>mix 185:22</p> <p>moment 141:12, 256:21</p> <p>monica 107:18, 107:19, 108:1, 114:15, 115:1, 117:21, 135:10, 146:10, 148:3</p> <p>monitor 7:9</p> <p>month 66:3</p> <p>months 28:17, 48:22, 49:5, 210:21</p> <p>more 21:17, 43:7, 73:12, 74:3, 74:18, 77:19, 94:7, 97:19, 100:15, 105:18, 107:11, 112:19, 136:21, 181:14, 183:14, 184:13, 184:16, 210:5, 227:3, 262:5, 262:19</p> <p>morning 9:1, 88:10, 92:14, 216:20, 239:17, 239:19, 240:5, 241:15</p> <p>most 219:5, 239:18</p> <p>motives 222:18</p> <p>move 208:7, 208:8, 208:21, 238:21</p> <p>moved 55:18</p> <p>moving 125:19, 187:2, 200:14</p>	<p>much 40:16, 43:6, 83:20</p> <p>multiple 232:18</p> <p>myself 89:2, 239:1</p> <hr/> <p style="text-align: center;">N</p> <hr/> <p>name 9:2, 9:6, 34:21, 39:2, 56:5, 56:7, 56:16, 65:7, 203:22, 262:4</p> <p>national 24:18</p> <p>necessary 233:21</p> <p>need 10:11, 10:21, 11:10, 25:16, 38:19, 41:22, 185:19, 195:3, 226:2</p> <p>needed 61:13, 61:14, 168:8, 233:11, 255:18</p> <p>neither 217:9, 275:9</p> <p>new 22:3, 22:4, 22:5, 238:13</p> <p>news 140:4</p> <p>next 10:3</p> <p>night 181:15, 217:11, 218:11, 218:21</p> <p>no-records 257:4, 257:13</p> <p>nods 10:14</p> <p>nonresponsive 206:10, 211:21</p> <p>nor 275:9</p>	<p>normal 172:13</p> <p>normally 23:19, 180:13, 180:14, 252:9, 254:10</p> <p>northwest 7:13</p> <p>notarial 275:13</p> <p>notary 2:14, 275:1, 275:20</p> <p>notation 157:18, 192:15, 267:3, 267:5, 268:21</p> <p>note 76:10, 249:18</p> <p>notebooks 47:9</p> <p>noted 76:10, 120:3, 244:2</p> <p>notes 69:19, 223:19, 243:22, 271:18, 271:21</p> <p>nothing 137:17, 201:17, 214:20, 215:8</p> <p>notice 2:12, 5:8, 14:18, 15:9, 17:13, 18:2, 75:16, 201:6, 220:13, 220:14, 266:17</p> <p>noticed 11:14</p> <p>noting 268:21</p> <p>november 16:12, 122:20, 123:5, 123:18, 138:12, 145:15, 145:16, 145:19, 145:22, 146:5,</p>	<p>146:11, 146:18, 147:17, 148:4, 148:8, 148:14, 149:19, 150:18, 150:21, 151:10, 151:12, 151:14, 151:21, 152:3, 152:6, 152:12, 152:19, 153:4, 153:15, 156:4, 156:20, 157:3, 208:1, 221:3, 221:14</p> <p>now 11:14, 19:10, 22:7, 28:7, 53:5, 83:15, 99:5, 116:17, 119:9, 125:10, 125:20, 127:9, 200:14, 213:18, 221:5, 243:7, 245:10</p> <p>number 7:3, 7:7, 15:15, 16:6, 16:11, 16:18, 16:22, 17:1, 17:6, 18:7, 18:18, 19:1, 19:6, 43:3, 77:15, 78:14, 79:16, 80:8, 80:22, 86:15, 87:14, 88:18, 88:19, 93:14, 94:3, 97:5, 99:4, 99:16, 100:8, 105:2, 109:14, 112:8, 114:5, 117:3, 118:17, 119:21, 120:3, 121:15, 121:22, 122:2, 122:10, 122:18, 124:8, 124:9, 128:15, 130:7, 130:9, 130:10,</p>
---	---	--	---

<p>130:19, 132:22, 136:2, 190:4, 198:17, 210:7, 221:4, 246:6, 263:3 numbers 42:6, 97:1, 108:14, 117:16, 121:1 numerous 239:11 nw 2:6, 3:19, 4:6, 4:14</p>	<p>164:16, 169:13, 172:1, 174:4, 174:18, 176:1, 176:11, 177:6, 177:22, 178:13, 179:4, 179:19, 189:11, 190:5, 191:1, 191:19, 197:14, 198:3, 200:22, 201:3, 203:8, 205:12, 210:4, 211:5, 211:15, 212:2, 212:14, 215:10, 216:6, 216:7, 219:8, 233:14, 250:10, 251:2, 251:16, 255:14, 256:10, 259:6, 259:14, 261:3, 263:17, 263:22, 266:15, 270:19</p>	<p>208:12, 208:14, 244:22, 246:11, 267:14, 273:16, 273:17 offered 188:11, 188:20 offhand 131:20 office 19:14, 19:19, 20:12, 20:18, 22:12, 25:3, 25:4, 26:12, 26:20, 26:22, 27:1, 27:18, 28:6, 28:15, 31:8, 33:12, 34:8, 34:11, 34:16, 34:19, 35:5, 36:2, 37:13, 44:9, 44:13, 44:15, 54:6, 55:9, 55:17, 58:7, 58:11, 58:16, 60:13, 60:15, 60:19, 61:21, 64:5, 72:18, 78:5, 78:18, 78:21, 78:22, 79:8, 79:10, 93:4, 101:3, 127:1, 127:6, 132:2, 136:12, 137:4, 138:3, 138:4, 144:5, 150:11, 150:16, 160:13, 177:2, 177:18, 178:9, 180:11, 181:9, 181:21, 182:1, 182:5, 235:15, 246:15, 246:20, 248:20, 249:9, 249:10, 249:13, 252:4, 252:7, 252:9, 253:1, 253:4, 261:14,</p>	<p>261:15, 261:21, 262:7, 262:11, 262:15, 263:10, 264:2, 265:17, 270:22, 271:3, 271:4, 271:8, 271:10, 271:12 officer 169:17, 275:2 offices 2:2, 7:12, 20:22, 22:3, 22:21, 127:4, 127:5, 136:22, 137:2, 186:11 official 108:2, 158:2, 158:8, 158:14, 158:20, 159:8, 161:19, 257:19, 258:7, 258:16, 259:10, 259:16, 260:10, 261:7 official's 259:4 officials 24:22, 31:19, 32:11, 33:6, 34:12, 46:16, 46:17, 51:10, 157:19, 157:20, 158:5, 158:13, 161:17, 162:18, 183:7, 242:20, 245:13, 257:22, 260:21</p>
<p style="text-align: center;">O</p>			
<p>o'clock 125:10, 209:12, 214:18, 215:6 obama 223:21, 224:17 object 10:9, 10:10, 10:11, 11:6, 32:17, 213:4, 221:3 objecting 176:17, 221:5 objection 24:11, 25:8, 33:8, 45:22, 50:19, 60:5, 68:20, 73:3, 75:6, 77:18, 81:16, 84:16, 85:8, 91:10, 91:16, 93:17, 97:22, 98:20, 124:15, 131:16, 134:1, 134:16, 135:1, 138:17, 144:7, 149:7, 151:17, 152:4, 152:14, 156:9, 156:12, 156:17, 156:22, 157:4, 158:10, 158:22, 161:15, 162:22,</p>	<p>obligations 31:19, 33:7 obtain 244:19, 245:7 obtained 167:14, 264:14 occasion 68:16 occur 46:3, 149:9, 149:14, 149:16 october 27:16, 58:8, 97:7 off 17:15, 32:13, 42:9, 50:13, 57:10, 57:11, 80:9, 81:20, 81:22, 90:12, 90:13, 90:16, 95:14, 101:7, 102:12, 106:14, 106:18, 120:21, 125:11, 125:13, 155:12, 173:3,</p>	<p>offer 19:14, 19:19, 20:12, 20:18, 22:12, 25:3, 25:4, 26:12, 26:20, 26:22, 27:1, 27:18, 28:6, 28:15, 31:8, 33:12, 34:8, 34:11, 34:16, 34:19, 35:5, 36:2, 37:13, 44:9, 44:13, 44:15, 54:6, 55:9, 55:17, 58:7, 58:11, 58:16, 60:13, 60:15, 60:19, 61:21, 64:5, 72:18, 78:5, 78:18, 78:21, 78:22, 79:8, 79:10, 93:4, 101:3, 127:1, 127:6, 132:2, 136:12, 137:4, 138:3, 138:4, 144:5, 150:11, 150:16, 160:13, 177:2, 177:18, 178:9, 180:11, 181:9, 181:21, 182:1, 182:5, 235:15, 246:15, 246:20, 248:20, 249:9, 249:10, 249:13, 252:4, 252:7, 252:9, 253:1, 253:4, 261:14,</p>	<p>official 108:2, 158:2, 158:8, 158:14, 158:20, 159:8, 161:19, 257:19, 258:7, 258:16, 259:10, 259:16, 260:10, 261:7 official's 259:4 officials 24:22, 31:19, 32:11, 33:6, 34:12, 46:16, 46:17, 51:10, 157:19, 157:20, 158:5, 158:13, 161:17, 162:18, 183:7, 242:20, 245:13, 257:22, 260:21 oh 13:10, 13:12, 17:14, 65:6, 67:7, 76:10, 91:5, 99:9, 105:17, 143:6, 170:11, 186:14, 203:10, 220:17, 243:5, 243:16, 267:19 oig 93:2, 93:5,</p>

<p>93:13, 94:17, 95:21, 96:4, 96:10, 96:13, 98:8, 98:16, 102:2, 102:3, 102:4, 102:10, 102:14, 102:17, 102:20, 103:5, 265:11, 265:14, 265:16, 265:21, 266:4, 266:7, 266:14, 267:1, 269:14 oig's 93:20, 94:2 once 55:18, 74:8, 75:22, 112:19, 177:11 one 12:17, 20:5, 21:11, 21:15, 22:12, 22:16, 24:8, 34:19, 36:4, 39:1, 41:8, 41:10, 41:15, 55:16, 69:13, 74:2, 74:3, 90:8, 97:2, 97:3, 104:20, 105:1, 105:14, 105:18, 107:11, 107:13, 111:4, 114:6, 116:6, 117:20, 118:12, 122:17, 127:14, 130:17, 136:5, 141:12, 141:15, 141:21, 147:4, 168:19, 173:9, 197:11, 205:15, 211:8, 217:10, 218:14, 220:19, 238:22, 243:12, 244:10, 246:2, 256:21, 258:5, 261:4, 261:5, 263:4,</p>	<p>264:9, 264:21, 265:2, 268:4 ones 47:6, 87:10, 175:15, 257:20 online 29:14, 29:15, 29:16, 30:20, 31:2, 226:11, 226:22 only 19:20, 20:1, 36:11, 68:16, 69:5, 98:15, 98:19, 105:9, 115:9, 115:12, 116:10, 116:14, 119:14, 127:1, 127:6, 129:8, 142:9, 147:5, 201:9, 237:2, 244:1, 257:19, 258:16, 259:10 operating 268:4 operation 60:19 operations 27:19, 60:18, 61:21 opportunity 48:6, 92:17, 140:18, 183:18 opposed 138:3 orally 135:12 order 32:1, 90:8, 201:12, 202:3, 213:10, 213:20, 213:22, 214:11, 221:7, 221:17, 223:7, 225:16, 226:5 ordered 220:4 orfanedes 3:5, 7:20</p>	<p>organization 61:4, 61:15, 62:10 organize 88:20, 89:4 organized 21:20, 21:21, 22:1, 22:5, 22:6, 22:7, 22:10, 89:7 original 220:13 originally 138:18, 177:10 other 9:22, 19:21, 20:7, 21:12, 22:21, 28:16, 37:11, 38:1, 38:4, 38:6, 38:17, 38:18, 38:21, 39:1, 39:19, 40:7, 46:9, 47:3, 59:22, 60:17, 61:3, 61:4, 65:21, 65:22, 80:2, 80:5, 84:6, 84:13, 86:4, 86:12, 87:4, 88:7, 89:12, 92:4, 97:10, 97:21, 104:15, 105:13, 105:17, 107:2, 107:14, 112:14, 115:17, 118:2, 118:18, 120:5, 121:18, 122:5, 122:7, 122:8, 123:11, 127:4, 137:9, 142:14, 143:17, 146:3, 152:2, 187:4, 193:21, 206:16, 206:18, 217:21, 227:20, 227:22, 230:2, 230:22,</p>	<p>232:21, 233:20, 233:21, 242:19, 250:8, 250:18, 250:22, 251:8, 256:6, 259:17, 261:6, 263:10, 271:15, 273:7 others 258:15 otherwise 275:11 ought 106:16 our 28:15, 29:3, 31:6, 31:7, 140:15, 179:7, 179:8, 196:15, 254:9 out 19:11, 31:8, 78:5, 87:17, 88:4, 168:10, 207:5, 210:21, 211:10, 264:3 outcome 275:11 outside 13:15, 28:15, 37:16, 66:11 outstanding 57:18 over 9:11, 9:13, 9:22, 42:1, 47:20, 66:14, 76:3, 86:2, 122:17, 159:18, 164:6, 197:16, 203:20, 210:21, 227:18, 232:13, 232:16, 232:17, 232:18, 234:19, 245:11, 248:8, 252:13 overbroad 77:20, 266:15 oversaw 160:13</p>
--	--	---	--

<p>oversight 27:19</p> <p>own 31:14, 150:13, 261:11, 261:16</p> <hr/> <p style="text-align: center;">P</p> <hr/> <p>p-i-t-t-e-r-l-e 9:7</p> <p>p-o-e-m-s 261:22</p> <p>page 5:2, 5:7, 6:2, 17:5, 17:13, 17:22, 43:19, 43:20, 63:17, 65:5, 80:19, 96:11, 96:15, 96:19, 97:1, 97:4, 99:15, 103:5, 108:14, 113:20, 115:8, 115:9, 115:12, 117:6, 117:7, 117:8, 117:9, 117:10, 117:11, 117:12, 117:14, 117:15, 117:20, 117:22, 139:6, 139:8, 148:2, 157:18, 187:19, 187:21, 192:1, 200:8, 200:15, 200:16, 200:20, 201:2, 202:12, 202:21, 204:4, 205:16, 205:20, 206:5, 206:20, 221:20, 221:22, 222:2, 223:13, 243:16, 244:2, 244:10, 253:8, 267:10, 267:12, 267:16</p> <p>pages 1:21, 108:18, 109:9, 110:1, 111:11, 111:13,</p>	<p>112:12, 112:20, 113:19, 114:20, 117:16, 205:22, 207:17, 207:18</p> <p>paragraph 96:20, 141:19, 142:2, 143:17, 144:17, 223:7, 223:16, 224:14</p> <p>part 10:1, 22:14, 23:17, 28:13, 29:3, 41:10, 43:18, 54:7, 56:7, 61:4, 83:6, 88:17, 88:18, 100:1, 128:22, 130:8, 152:16, 160:21, 187:9, 199:3, 203:21, 204:16, 204:21, 223:17, 247:9, 260:16, 263:5, 267:13, 269:14</p> <p>particular 22:13, 23:9, 25:20, 58:2, 61:13, 89:5, 101:8, 122:3, 124:7, 134:18, 134:20, 136:5, 147:4, 150:5, 186:22, 189:8, 219:1, 226:13, 226:20, 231:12, 233:19, 235:4, 241:5</p> <p>particularly 136:7</p> <p>parties 161:8, 275:10</p> <p>parts 51:10, 104:12, 104:13, 104:14</p> <p>patrick 53:12, 158:17</p> <p>paul 3:5, 7:20</p>	<p>pending 79:20, 267:20, 267:21</p> <p>people 23:18, 58:1, 109:6, 136:3, 140:16, 159:18, 182:13, 186:12, 193:19, 217:21, 218:9, 218:10, 218:12, 230:22, 231:11, 231:13, 233:16</p> <p>per 96:14</p> <p>percent 114:2</p> <p>perfect 217:10</p> <p>perform 180:14, 186:12</p> <p>performed 5:11, 12:5, 26:16, 80:14, 82:21, 126:11, 128:4, 130:3, 180:12, 227:9</p> <p>performing 128:10, 157:7</p> <p>perhaps 65:14</p> <p>period 185:10</p> <p>permanent 28:5, 54:8</p> <p>permit 213:13</p> <p>permitted 184:16, 214:6, 219:12</p> <p>permitting 219:20</p> <p>person 25:20, 39:6, 39:7, 105:20, 119:14</p> <p>personal 6:7, 32:22,</p>	<p>40:20, 98:4, 98:5, 158:1, 158:8, 158:14, 158:19, 159:8, 159:20, 161:18, 162:2, 162:5, 184:21, 185:22, 192:5, 192:12, 195:16, 257:20, 258:3, 258:5, 258:11, 258:20, 259:13, 260:22, 261:5, 262:17, 262:21, 264:19, 265:9, 270:1, 270:12</p> <p>pertain 185:14</p> <p>pertained 88:19</p> <p>pertaining 124:1, 124:10, 134:21, 161:13, 210:2, 258:19, 259:9, 260:21, 264:13</p> <p>pertains 88:17</p> <p>pezzi 3:15, 8:8, 69:15</p> <p>philip 187:6, 188:3, 199:2</p> <p>phone 36:8, 39:6, 268:7</p> <p>pick 110:1, 111:13, 112:19, 114:20</p> <p>pitterle 1:13, 2:2, 5:2, 5:7, 6:2, 7:4, 8:19, 9:1, 9:4, 9:7, 14:13, 14:16, 15:4, 42:10, 57:17, 82:5, 90:19,</p>
---	---	--	---

<p>91:3, 92:22, 103:8, 106:19, 121:10, 125:19, 157:9, 198:6, 243:21, 246:9, 274:2 place 7:12, 142:9, 171:20, 172:4, 245:11, 246:22, 247:5, 247:7, 247:18 plain 220:12 plaintiff 1:5, 3:2, 7:16, 7:18, 7:21, 8:1, 8:21, 91:8, 104:19, 140:5, 153:5, 155:4, 161:21, 161:22, 162:16, 163:14, 163:19, 167:6, 167:20, 168:5, 169:8, 172:8, 178:22, 184:12, 184:15, 185:9, 186:17, 188:20, 188:21, 199:18 plaintiff's 5:8, 14:18, 33:5, 88:10, 124:14, 129:20, 130:10, 131:8, 145:6, 145:12, 146:11, 152:20, 168:1, 175:22, 176:9, 176:22, 177:17, 179:16, 180:4, 180:22, 181:18, 181:20, 182:11, 183:19, 184:17, 185:17, 187:10, 188:8, 188:22, 190:13, 190:22, 191:17, 220:9, 220:13, 221:4, 273:6</p>	<p>planet 7:11, 8:16 planned 214:21, 215:9 planning 26:19 play 51:21, 54:15, 92:8, 222:11 played 52:1 please 7:14, 8:17, 9:2, 9:5, 10:6, 22:19, 24:14, 231:11, 237:13, 246:7 poems 261:22, 262:1, 262:6, 262:11, 262:15, 263:16 point 11:11, 23:11, 40:20, 52:4, 52:6, 52:7, 52:9, 63:19, 65:6, 80:12, 83:10, 96:18, 106:20, 141:18, 144:21, 147:4, 153:12, 155:5, 157:19, 161:6, 161:20, 163:9, 163:22, 164:21, 165:9, 170:12, 179:1, 179:17, 185:8, 191:22, 192:1, 192:18, 194:9, 194:22, 195:7, 202:21, 205:11, 206:1, 210:7, 213:3, 217:9, 217:22, 218:16, 221:3, 226:15, 227:4, 227:10, 244:10, 247:16, 263:4, 267:16, 267:18,</p>	<p>267:22, 268:15 point-by-point 239:11 pointing 168:15 points 5:20, 6:4, 6:6, 12:7, 12:12, 17:7, 18:8, 18:20, 82:22, 161:17, 177:3, 177:19, 178:11, 178:16, 181:11, 181:16, 182:2, 196:14, 207:3, 207:6, 208:10, 210:3, 210:5, 216:12, 222:10, 222:13, 222:17, 223:1, 223:2, 223:8, 223:17, 224:15, 225:4, 225:6, 225:10, 225:22, 227:3, 237:16 policies 137:6 policy 137:4 portion 43:17, 63:15, 65:3, 65:5, 94:2, 112:14, 115:5, 267:13 portions 43:21, 70:9, 93:7, 108:11, 108:12, 110:8, 110:19, 111:21, 113:7, 113:11, 114:8, 115:3, 115:4, 116:2, 116:8, 116:18, 118:8, 124:6 position 26:10, 26:15, 27:6, 27:11, 27:12, 27:15,</p>	<p>28:1, 28:2, 28:9, 49:16, 53:18, 54:8, 54:12, 55:3, 56:6, 155:22, 212:19, 249:4, 265:21, 267:9, 268:9, 269:4 positions 28:3, 58:2 possibly 219:11, 220:3 potential 167:21 potentially 78:8, 84:6, 125:5, 129:15, 132:15, 133:13, 133:19, 134:11, 136:19, 167:4, 167:22, 176:9, 180:22, 182:11, 183:17, 207:9 practice 96:10, 96:13, 109:2, 109:8, 136:7, 136:15, 140:15 practices 136:21 precipitated 131:14, 131:20 premises 25:17 prep 46:22 preparation 36:2, 37:2, 37:3, 37:12, 53:16, 56:12, 57:7, 76:20, 131:2, 132:11, 193:14, 196:15, 202:18, 208:9, 226:18, 227:2, 228:1, 230:4, 232:19, 239:12, 255:7, 255:19,</p>
--	---	--	--

<p>266:8, 271:1, 271:19, 272:9 prepare 16:9, 17:2, 19:2, 19:7, 35:18, 37:17, 38:3, 38:22, 46:12, 46:18, 48:4, 53:9, 65:10, 65:21, 87:5, 93:8, 100:5, 101:5, 101:14, 101:18, 106:7, 119:10, 119:22, 123:16, 170:15, 193:1, 193:2, 193:9, 193:10, 194:2, 210:12, 227:21, 230:3, 230:7, 232:5, 238:2, 250:4, 254:13, 271:17 prepared 13:18, 15:16, 16:2, 16:15, 16:19, 18:13, 18:20, 63:22, 64:3, 88:22, 128:13, 193:5, 197:6, 213:8, 216:12, 224:11, 225:12, 227:12, 227:14, 227:17, 227:18, 229:21, 232:2, 237:21, 256:20, 271:16 preparing 17:6, 18:7, 37:8, 37:20, 50:2, 56:19, 64:6, 86:12, 86:20, 100:19, 189:22, 193:13, 197:17, 226:18, 227:19, 251:14, 252:11, 263:12, 264:6</p>	<p>present 4:19, 69:7 presume 148:14 pretty 50:11 previous 58:14, 103:16, 138:1, 144:22, 239:18, 240:14, 241:2 previously 22:6, 228:7, 232:15, 233:6, 245:10, 250:20, 251:13 primarily 227:2, 271:10 primary 109:4 prime 214:17, 215:4, 219:3, 219:7 prince 3:16, 8:6, 170:3, 189:3, 189:15, 189:21, 190:17, 191:5, 191:10, 221:12 prior 24:22, 25:7, 49:15, 52:16, 68:12, 162:11, 166:3, 172:9, 225:3, 239:19, 250:8, 250:15 privacy 20:9 private 16:8, 32:16, 101:21, 104:11, 105:12, 107:5, 108:8, 110:5, 111:1, 111:17, 112:2, 113:1, 113:14, 115:20, 118:22, 119:7, 119:12</p>	<p>privilege 38:20 probably 31:3, 36:17, 37:22, 39:10, 196:20, 232:6, 238:3, 238:6, 239:20, 252:3 problem 179:22, 186:3 procedure 137:3 proceed 225:18, 225:19 process 20:13, 20:15, 20:17, 24:20, 32:11, 170:17, 190:11, 256:1 processed 33:5, 191:17 processes 254:10 processing 5:18, 12:15, 21:1, 21:6, 32:9, 39:13, 39:14, 39:15, 39:19, 39:21, 40:2, 54:16, 55:15, 56:1, 77:7, 77:22, 82:10, 82:14, 83:9, 83:17, 84:1, 84:7, 84:14, 84:20, 85:17, 93:3, 93:9, 93:15, 94:6, 95:19, 125:21, 153:11, 170:17, 182:13, 185:18, 190:12, 190:21, 201:7, 234:4, 253:12, 253:17, 254:8, 254:17, 254:20, 272:18, 273:5 produce 75:1, 250:7</p>	<p>produced 91:8, 91:18, 91:21, 137:14, 138:1, 144:22, 145:21, 146:3, 148:20, 149:1, 149:4, 151:8, 165:16, 179:10, 180:6, 180:21, 182:19, 189:4, 189:5, 194:10, 194:22, 195:3, 199:17, 199:20, 201:10, 208:1, 250:21, 269:16 production 71:7, 151:22, 186:15 productions 187:9 professional 28:13 program 20:6, 20:11, 21:2, 28:14, 62:4, 160:18, 160:22 programs 3:18, 19:14, 20:8, 58:7, 58:16, 60:14, 60:20, 253:2 prong 32:1, 32:6 protest 214:21, 215:9 protest-gone-awry 224:19 provide 31:18, 33:6, 41:4, 45:10, 57:20, 60:3, 61:12, 61:15, 62:17, 73:12, 73:15, 106:22, 119:16, 139:1, 184:2, 194:18, 221:10, 234:10,</p>
---	---	--	---

<p>239:3, 257:2, 268:3 provided 13:18, 29:6, 30:17, 30:19, 59:7, 59:22, 60:8, 60:10, 84:5, 84:9, 88:10, 98:8, 109:13, 118:12, 130:6, 177:3, 177:20, 178:12, 200:6, 225:4, 225:6, 226:1, 247:20, 257:3 providing 61:5, 61:9, 194:18 pst 130:3, 131:6, 131:15, 132:1, 132:7, 133:14, 133:22, 134:14, 135:18, 205:4, 205:5 psts 129:21, 133:8, 205:3 public 2:14, 45:11, 186:2, 192:5, 192:11, 195:11, 195:15, 209:6, 245:14, 250:21, 252:4, 252:6, 260:4, 275:1, 275:20 publicity 75:3 publicly 92:1, 211:11, 250:14, 251:9 publishing 60:15, 60:19 pull 94:11, 104:1, 168:10 purpose 24:7, 116:3</p>	<p>purposes 24:5, 34:13, 66:7, 80:8, 86:19, 87:22, 98:17, 105:10, 113:12, 114:13, 180:4, 272:3 pursuant 2:12, 5:9, 14:19 push 171:19, 172:3, 172:6 put 14:4, 167:8, 185:9, 193:17, 211:10</p> <hr/> <p style="text-align: center;">Q</p> <hr/> <p>qandil 219:3 question 10:3, 10:5, 10:7, 10:20, 11:2, 11:7, 22:2, 24:12, 25:2, 32:20, 33:17, 42:14, 42:15, 43:12, 46:14, 50:11, 67:19, 73:4, 73:6, 77:20, 79:19, 79:21, 84:17, 84:18, 93:19, 105:4, 117:19, 121:17, 121:18, 131:17, 133:17, 133:19, 135:16, 137:16, 139:11, 143:6, 144:15, 147:22, 149:8, 156:13, 162:10, 163:12, 164:10, 169:5, 172:2, 174:22, 175:8, 176:5, 176:19, 177:14, 179:20, 182:16,</p>	<p>184:11, 185:8, 187:17, 190:8, 194:19, 197:3, 197:8, 200:11, 202:10, 203:10, 206:20, 207:13, 211:9, 211:18, 212:8, 215:1, 218:2, 240:17, 248:18, 248:22, 253:7, 260:14, 260:17, 260:20, 262:5, 265:6, 265:15, 266:22, 267:20, 267:21, 272:2, 272:13 questions 10:3, 32:18, 45:18, 50:5, 57:19, 81:17, 125:21, 128:3, 149:10, 169:4, 179:22, 213:18, 222:22, 223:3, 224:6, 224:12, 225:9, 225:12, 225:14, 225:18, 229:20, 251:18, 273:15 quick 172:22, 244:17 quickly 31:21</p> <hr/> <p style="text-align: center;">R</p> <hr/> <p>raise 45:18, 147:20, 226:2, 226:3, 264:18, 265:8, 265:11 raised 265:22 ramona 3:3, 7:16, 31:20, 80:19, 86:3, 103:3, 220:10, 267:15, 269:8</p>	<p>range 138:11, 138:15, 139:9, 139:13, 139:17, 140:1, 140:7, 140:11, 141:11, 142:11, 142:15, 142:19, 143:7, 144:3, 144:10, 145:1 rather 183:10, 184:11, 223:8 rcl 1:7 rd 131:9, 131:12, 132:7, 132:9, 132:15, 133:10, 133:22, 134:13, 135:4, 135:15, 135:20, 137:8, 138:9, 138:22, 139:13, 139:17, 140:1, 140:7, 140:11, 141:11, 142:5, 142:12, 143:4, 143:21, 144:10, 144:13 reaction 32:15, 101:21, 104:10, 105:12, 107:4, 108:7, 110:4, 110:22, 111:16, 112:1, 112:22, 113:14, 115:20, 118:21, 119:6, 119:12 read 8:5, 43:22, 66:22, 93:11, 93:20, 113:9, 115:16, 116:17, 223:18, 224:14, 260:13, 260:16, 273:12, 274:3 readily 260:7 reading 17:15, 96:15,</p>
---	---	---	---

<p>223:16, 275:8 ready 172:21 real 51:5 really 25:20, 31:20, 40:17, 40:18, 43:6, 71:10, 74:17, 76:6, 76:11, 163:22, 189:7 reask 73:4, 84:21, 240:17 reason 9:15, 37:1, 53:8, 53:15, 55:11, 81:10, 174:13, 247:6, 247:17, 268:12, 269:13 reasonableness 201:14, 213:6, 214:9, 219:18 reasons 24:8 recall 30:13, 40:3, 40:4, 40:17, 42:21, 56:9, 75:10, 80:9, 83:15, 94:14, 101:7, 101:16, 102:8, 108:12, 109:5, 116:17, 122:1, 124:5, 131:20, 136:4, 155:2, 173:16, 189:12, 190:15, 192:8, 195:17, 196:8, 233:18, 238:10, 238:15, 241:4, 247:13, 249:19, 249:22, 258:13, 258:18 recalled 70:7, 72:7,</p>	<p>83:20, 85:4, 193:19 recalls 84:14, 192:13, 247:11, 248:10 receipt 126:14, 126:15 receive 26:2, 29:1, 29:9, 29:20, 30:12, 30:14, 126:3, 165:14, 188:1, 196:11, 196:19, 216:21, 220:8, 220:13, 228:13, 232:7, 236:3, 238:4, 238:9, 238:13, 239:15, 239:18 received 29:13, 32:10, 43:4, 72:11, 78:3, 126:5, 166:3, 171:12, 180:10, 187:3, 188:7, 196:14, 197:10, 217:3, 228:17, 233:3, 234:14, 236:9, 238:6, 240:12, 240:18, 241:7, 241:14, 241:19, 252:19, 254:3, 254:22 receiving 232:10, 251:10 recess 57:13, 82:2, 90:18, 125:15, 173:5, 208:16, 245:2 recognize 56:5, 56:7, 56:16, 198:10 recollection 82:11, 82:19, 83:7, 83:12, 84:8, 123:10,</p>	<p>134:17, 134:20, 173:19, 189:8, 192:8, 270:4 record 9:3, 9:21, 10:11, 11:21, 12:4, 12:14, 13:22, 14:4, 14:6, 23:8, 23:10, 23:13, 23:16, 24:1, 24:3, 25:14, 42:9, 43:10, 44:7, 57:10, 57:12, 57:15, 65:18, 81:20, 82:1, 82:4, 90:12, 90:14, 90:17, 91:1, 95:14, 97:4, 100:15, 111:7, 112:5, 120:21, 121:4, 121:10, 125:12, 125:14, 125:17, 128:14, 150:13, 150:15, 151:14, 154:20, 155:12, 159:14, 160:17, 161:17, 173:4, 173:7, 186:7, 198:15, 198:16, 200:10, 208:12, 208:15, 208:18, 225:20, 227:7, 231:20, 234:3, 235:13, 237:14, 237:18, 245:1, 245:4, 246:11, 246:12, 265:14, 267:14, 273:16, 273:17, 275:5 record's 10:6 recorded 221:13 records 5:19, 20:6,</p>	<p>22:17, 22:22, 23:3, 23:18, 23:22, 24:4, 24:16, 24:18, 24:20, 24:21, 25:5, 25:15, 29:3, 30:15, 34:12, 34:16, 34:18, 34:22, 35:2, 35:12, 53:1, 53:5, 54:22, 55:1, 55:5, 58:13, 75:2, 78:6, 78:7, 79:13, 93:3, 103:17, 127:2, 127:16, 129:16, 132:16, 132:19, 133:13, 133:20, 134:12, 134:21, 136:13, 136:19, 136:22, 159:5, 161:4, 161:12, 163:5, 165:10, 167:21, 168:1, 169:17, 177:1, 177:18, 178:3, 178:4, 181:9, 183:17, 184:1, 184:17, 184:21, 185:1, 185:3, 185:4, 185:6, 185:13, 185:14, 185:20, 185:22, 188:2, 188:6, 188:21, 189:4, 190:20, 213:17, 219:19, 222:16, 252:10, 254:13, 258:19, 259:9, 259:19, 265:18 redacted 81:5, 81:6, 99:18, 99:21, 100:4, 255:4 redaction 16:7, 201:16</p>
---	---	---	---

<p>redactions 99:22, 100:2, 100:3, 191:7, 191:14, 255:12, 255:17 reduced 275:7 refer 21:4, 193:4, 213:19, 230:18, 258:1, 260:21, 261:6 reference 16:14, 98:15, 98:19, 109:16, 197:20, 239:1, 244:3, 244:11, 258:9 referenced 81:3, 103:4, 147:9, 147:16, 149:19, 150:17, 152:19, 153:4, 156:8, 156:20, 194:8, 194:21, 195:6, 207:6, 245:8, 245:15, 250:19, 263:15 references 146:15, 147:5, 193:17, 231:6, 231:7, 239:4 referencing 156:5 referrals 21:12 referred 132:22, 244:5, 258:18, 261:5 referring 31:13, 70:17, 70:20, 97:1, 97:5, 105:3, 112:6, 126:7, 128:2, 128:16, 139:7, 145:17, 146:21, 147:2, 157:17, 165:3,</p>	<p>178:4, 187:20, 192:20, 195:2, 196:10, 200:11, 253:6, 255:2, 259:2, 259:11, 262:22, 265:13, 265:15 refers 12:9, 151:11, 193:3, 260:1, 263:16 refining 138:21 reflected 146:18, 151:10, 152:2, 157:3, 265:21 reflects 86:8 refresh 82:19, 83:12, 195:3 refreshed 82:11, 83:6, 173:18, 240:9 regard 82:20, 96:10, 122:4, 155:21, 178:11, 230:8, 270:6 regarding 16:13, 22:17, 31:19, 33:7, 122:21, 123:6, 179:11, 195:15, 246:14, 255:7, 267:3, 268:16, 270:12 regards 22:22, 36:12, 45:1, 45:11, 55:12, 74:3, 100:6, 127:10, 251:19, 256:8 reines 187:6, 188:3, 199:2 relate 21:1, 31:21,</p>	<p>86:11, 87:18, 123:8 related 60:18, 73:20, 73:21, 73:22, 88:15, 89:16, 269:17, 275:9 relates 213:6, 213:16, 214:8, 225:10 relating 26:17, 46:7, 73:18, 84:9, 85:17, 102:20, 120:5, 149:10, 165:11, 166:8, 169:11, 182:10, 182:19, 258:2, 259:12 relation 193:11 relationship 223:2 relay 184:14 released 78:9, 200:19 relevant 153:5, 168:10, 175:21, 176:21, 177:8, 177:16, 178:10, 178:20, 182:6, 185:16, 189:9, 190:3, 190:10, 190:20, 191:15, 198:2, 202:2, 209:22, 211:2, 211:12, 212:11, 212:16, 212:21, 214:8, 220:3, 222:16, 252:10, 255:12, 258:12 relied 231:16, 250:20, 251:14 reluctance 222:20</p>	<p>rely 142:10, 143:19, 144:14, 262:14, 264:12 relying 141:10, 195:19, 195:21, 196:2, 229:8, 235:5, 235:9, 237:10, 241:21, 243:13 remaining 188:6 remember 32:5, 42:22, 205:9, 209:8, 236:7, 236:8 remembered 270:8 remembers 103:8 reminders 31:8, 31:11 repeat 42:13, 84:17, 265:6 rephrase 25:3, 60:6, 197:7, 248:18 report 16:19, 17:1, 27:6, 62:6, 93:2, 93:5, 93:7, 93:11, 93:13, 93:20, 94:2, 94:17, 96:1, 96:16, 97:21, 98:9, 98:16, 102:2, 102:3, 102:4, 102:7, 102:11, 102:14, 102:20, 103:6, 120:2, 120:4, 120:9, 120:11, 120:12, 120:14, 120:15, 121:12, 121:20, 121:21, 122:2, 122:4, 122:6,</p>
---	---	---	---

<p>122:15, 154:10, 154:16, 155:1, 155:3, 161:8, 162:12, 168:17, 169:17, 252:1, 265:11, 265:14, 265:16, 265:22, 266:4, 266:5, 266:7, 266:14, 267:1, 267:11, 269:14 reported 1:22, 27:7, 62:8, 252:6 reporter 2:13, 8:15, 8:17, 9:15, 9:19, 275:1 reports 153:19, 172:14, 259:21 repositories 127:8, 127:17 represent 7:15, 12:20, 206:19, 269:5 representation 91:20, 223:6 representations 46:5 representative 1:12, 156:1, 256:6 representatives 50:17 representing 7:10, 8:16, 59:17, 151:4, 193:6, 194:5, 242:18, 248:3 republic 23:12 requested 228:6, 237:3, 275:8 requesters 222:19 requesting 230:2, 258:15</p>	<p>requestors 161:2, 257:5, 257:14 requests 20:8, 20:14, 20:19, 39:19, 45:9, 54:5, 84:3, 100:17, 136:2, 136:16, 177:9, 178:2, 182:14, 183:21, 185:18, 254:11, 255:1, 268:6 required 11:6, 29:5 requirements 265:19 research 26:14, 27:3, 27:21 reserve 273:12 resources 26:18, 271:5 respond 145:11 responded 161:2, 162:14, 163:13, 190:12, 191:17, 257:1 responding 26:17, 73:16, 162:13, 177:9, 180:4, 190:21 response 54:5, 71:22, 74:2, 101:11, 105:2, 105:15, 123:18, 123:21, 124:13, 124:20, 126:20, 127:2, 129:19, 130:7, 131:7, 132:16, 136:5, 136:16, 137:10, 145:6, 145:22, 146:11, 164:20, 183:19, 184:17, 186:17,</p>	<p>187:10, 188:7, 188:21, 188:22, 199:22, 200:1, 201:6, 211:22, 223:21, 257:4 responses 10:16, 20:19, 257:14, 259:3 responsibilities 20:3, 59:20, 62:1, 160:22, 161:1 responsibility 54:3, 61:17 responsible 20:7, 20:18, 22:12, 22:13, 22:20, 34:11, 62:3, 271:11 responsive 5:12, 12:6, 21:18, 78:8, 82:22, 125:5, 126:12, 128:5, 129:15, 132:16, 133:2, 133:13, 133:20, 134:12, 136:19, 137:21, 152:20, 153:2, 161:3, 163:21, 167:4, 168:1, 176:4, 176:9, 179:16, 180:22, 182:11, 183:17, 184:1, 185:16, 207:1, 207:9, 213:7, 213:17, 214:10, 219:19, 227:10 rest 237:7 restate 174:22, 176:19, 179:20, 202:10, 203:10 result 125:6, 127:17, 129:13, 131:4,</p>	<p>133:10, 133:14, 133:20, 134:12, 137:18, 147:6, 204:22, 215:22, 216:18, 217:17, 238:16 results 135:5, 204:17, 204:22 retain 25:16 retained 14:14, 15:5, 42:11, 90:20, 198:7, 246:10 retire 24:16, 25:19 retired 23:1, 23:11, 23:12, 23:16, 23:19, 23:22, 24:2, 24:4, 24:5, 24:9, 24:15, 24:17 retirement 24:21, 25:5 retiring 24:20, 34:12 retrieval 129:7 retrieve 150:16 retrieved 123:20, 124:12, 124:17, 146:16, 148:19, 149:13 return 51:21, 52:18, 103:17, 164:4, 164:14, 165:11, 171:7, 173:14, 174:16, 175:4, 175:17, 272:22 returned 40:21, 52:5, 164:7, 164:8, 165:1, 165:22, 166:7, 166:15,</p>
--	---	--	--

<p>167:2, 169:21, 170:3, 171:21, 172:10, 172:18, 177:12, 184:9, 185:12, 207:4 returning 52:3, 52:13 reveal 222:16 reviewing 65:12, 71:6, 71:18, 72:5, 78:11, 121:11, 134:21, 172:9, 242:10, 256:19 revolves 223:16 rice 17:7, 18:9, 177:3, 177:20, 178:12, 178:16, 181:11, 207:2, 207:7, 207:11, 207:12, 210:6, 216:3, 216:11, 216:13, 216:19, 217:7, 225:6, 226:1 rice's 18:14, 19:2, 138:3, 207:2, 222:10, 222:15 right 11:10, 11:12, 11:14, 12:4, 13:9, 14:16, 17:5, 32:4, 38:5, 38:9, 41:19, 43:2, 46:9, 49:8, 49:9, 78:15, 86:9, 86:17, 87:13, 92:18, 108:22, 120:20, 124:20, 129:11, 134:9, 142:18, 152:17, 154:11, 196:3, 209:8,</p>	<p>214:4, 229:18, 244:9, 244:12, 249:6, 264:15, 265:4, 268:20, 273:12 robert 3:16, 8:6, 170:3, 189:2 role 50:14, 51:20, 52:1, 53:5, 54:15, 55:14, 60:8, 61:17, 84:3, 85:2, 159:6, 163:5, 222:12, 222:17, 227:22 roles 22:16, 59:4, 159:14 room 175:12 rotational 28:6, 28:15 roving 214:7, 225:13 rule 14:19, 201:4, 219:9 rules 9:12 running 61:15, 221:13</p> <hr/> <p style="text-align: center;">S</p> <hr/> <p>s 117:14 said 9:20, 23:4, 35:4, 43:1, 44:7, 52:6, 52:8, 52:10, 54:22, 64:12, 66:14, 66:15, 73:22, 76:4, 76:7, 83:11, 84:19, 88:2, 93:21, 96:11,</p>	<p>96:16, 103:10, 114:5, 114:15, 115:17, 141:1, 149:9, 150:8, 155:7, 173:15, 189:7, 192:14, 193:19, 214:7, 217:5, 217:7, 233:18, 241:14, 249:19, 251:6, 269:9, 273:11, 275:5 sake 10:6 same 17:17, 17:22, 33:8, 46:14, 61:3, 61:12, 67:19, 72:5, 117:19, 133:1, 133:3, 133:7, 138:2, 152:14, 152:16, 178:2, 183:1, 183:21, 186:19, 192:17, 212:2, 215:10, 224:14, 229:20, 239:13, 241:20, 244:9, 244:14, 249:4, 259:17, 268:15, 274:4 samuelson 251:20, 253:9, 253:20, 258:14 sat 204:5 saturday 204:5 saw 154:1, 258:13, 259:7 say 10:11, 22:9, 23:3, 23:15, 26:20, 29:15, 31:10, 39:14, 40:14, 43:21, 70:17, 71:22,</p>	<p>72:20, 74:5, 74:16, 84:2, 84:13, 84:22, 85:11, 85:15, 88:7, 88:16, 96:2, 141:2, 141:10, 150:3, 151:19, 152:6, 156:14, 157:19, 164:1, 168:7, 172:2, 195:12, 201:20, 204:19, 209:4, 214:22, 217:9, 252:5, 270:7, 273:7 saying 123:19, 221:6, 244:8, 254:5, 258:15 says 108:22, 139:9, 155:18, 157:6, 167:19, 192:3, 195:18, 200:16, 201:12, 204:5, 213:10, 213:12, 260:3 scanned 83:4 schedule 23:4 schedules 23:1, 25:15 scholl 53:12, 53:13, 53:16, 54:15 scope 32:18, 33:2, 33:9, 57:19, 98:1, 201:4, 202:5, 202:8, 213:4, 214:13, 215:11, 215:14, 219:9, 221:7, 225:15, 243:10, 266:16, 266:20 scribbles 115:16</p>
--	---	--	--

<p>seal 275:13</p> <p>searched 127:17, 129:1, 129:4, 129:21, 133:7, 136:18, 138:19, 143:9, 176:2, 180:11, 207:3</p> <p>searches 5:11, 6:5, 12:5, 78:6, 78:17, 80:14, 82:21, 84:6, 84:10, 85:12, 124:13, 124:18, 124:19, 125:1, 125:6, 126:11, 126:14, 127:9, 127:15, 128:4, 128:19, 133:14, 136:7, 136:9, 136:15, 137:9, 138:7, 138:14, 138:16, 138:18, 145:2, 145:4, 146:6, 147:3, 151:18, 152:2, 168:8, 186:9, 186:12, 186:13, 187:12, 202:1, 205:1, 205:6, 227:9, 228:10, 228:12, 267:8, 269:4</p> <p>searching 34:13, 54:4, 96:11, 180:17, 188:20</p> <p>second 5:8, 12:13, 14:18, 16:1, 17:5, 17:15, 18:2, 20:6, 22:16, 96:20, 202:21, 220:18</p> <p>secret 129:12, 180:18,</p>	<p>263:6</p> <p>secretariat 34:17, 35:6, 35:8, 79:11, 96:9, 96:12, 101:3, 126:19, 129:6, 137:5, 150:12, 234:1, 235:16, 271:5</p> <p>secretariat's 37:13, 127:19</p> <p>secretaries 25:6, 34:13, 61:10, 103:16, 262:9, 263:5</p> <p>secretary's 34:17, 35:6, 35:7, 138:4, 163:6, 178:9, 181:21, 182:1, 182:5, 231:12, 262:15, 271:8</p> <p>section 148:2, 222:4</p> <p>sections 142:14</p> <p>security 218:9, 265:18</p> <p>see 12:2, 36:9, 41:7, 63:9, 63:21, 81:10, 92:10, 95:17, 100:3, 103:8, 121:8, 121:21, 139:4, 142:7, 148:5, 148:10, 155:6, 155:13, 178:14, 191:14, 192:17, 203:2, 204:8, 210:10, 214:12, 223:15, 242:2, 243:3, 249:12, 254:18, 257:7, 257:8, 258:9, 267:17</p> <p>seeing 258:13</p>	<p>seeking 256:8, 257:19, 258:19, 259:9, 259:19, 261:2</p> <p>seem 233:21</p> <p>seemed 43:1, 192:8, 228:21, 232:13, 233:5, 234:19</p> <p>seems 221:12</p> <p>seen 15:7, 245:10</p> <p>select 117:21</p> <p>send 257:4, 257:13, 264:3</p> <p>sends 31:8</p> <p>senior 25:6, 26:11, 58:3, 59:20, 60:8, 60:22, 157:19, 157:20, 158:5, 158:12, 163:5, 187:4</p> <p>seniors 260:11, 263:11</p> <p>sense 183:8</p> <p>sent 43:4, 71:9, 72:11, 78:5, 101:9, 146:10, 148:8, 148:16, 149:12, 203:5, 203:11, 207:21, 257:12</p> <p>sentence 97:6, 223:12</p> <p>separate 23:19, 90:3, 137:13, 152:15, 200:21, 205:11, 205:14, 205:17, 206:2</p>	<p>separately 42:6</p> <p>september 17:8, 18:9, 18:11, 18:14, 127:15, 127:18, 128:8, 128:19, 129:4, 129:10, 129:14, 131:9, 131:12, 132:6, 132:9, 132:14, 132:15, 133:10, 133:22, 134:13, 135:4, 135:15, 135:20, 136:17, 137:8, 138:8, 138:9, 138:12, 138:20, 138:22, 139:13, 139:17, 140:1, 140:7, 140:11, 141:11, 142:4, 142:5, 142:12, 142:20, 142:21, 143:2, 143:3, 143:5, 143:15, 143:20, 143:21, 144:3, 144:10, 144:12, 144:13, 147:3, 164:2, 177:4, 177:21, 199:13, 202:1, 203:7, 203:14, 204:5, 204:17, 205:1, 209:3, 209:7, 209:9, 209:13, 209:17, 209:18, 211:12, 212:10, 212:20, 214:17, 215:5, 215:21, 217:1, 218:7, 218:18, 219:4, 275:17</p> <p>service 29:8, 30:18, 31:6</p> <p>services 19:15, 58:5,</p>
--	---	--	---

<p>58:8, 58:17, 60:14, 60:20, 62:10, 160:5, 253:2 set 267:4, 269:1, 275:12 sets 167:8 settle 168:5, 172:8, 172:9, 184:13 settlement 153:16, 153:18, 155:5, 155:16, 157:14, 161:10, 161:22, 162:15, 166:13, 167:5, 167:13, 169:7, 171:20, 172:4 seven 25:17, 25:18, 58:14 seventh 263:4 several 20:4, 127:7, 167:7, 196:16, 197:17, 227:19, 228:3, 230:10, 232:17, 234:9, 238:11, 242:16, 259:16, 262:9 shapiro 4:3 she 14:6, 32:21, 40:11, 40:19, 53:1, 53:7, 54:18, 54:21, 55:5, 58:13, 61:13, 62:18, 63:3, 63:6, 68:21, 72:10, 76:1, 76:2, 79:19, 79:20, 82:6, 86:6, 87:20, 87:21,</p>	<p>88:2, 90:12, 106:5, 106:7, 106:13, 106:15, 108:3, 108:22, 109:2, 109:3, 109:5, 109:7, 109:12, 110:13, 110:17, 135:11, 158:8, 159:19, 160:1, 160:3, 160:4, 160:6, 160:13, 161:18, 162:5, 166:22, 168:16, 171:1, 172:10, 177:10, 178:16, 183:4, 183:8, 185:14, 202:6, 204:12, 206:6, 206:7, 209:16, 211:1, 211:10, 211:17, 211:19, 211:20, 212:10, 216:2, 216:4, 217:19, 219:7, 221:6, 251:21, 252:1, 252:2, 252:6, 252:18, 252:21, 253:1, 253:4, 253:14, 258:14, 261:10, 267:5 she's 62:21, 88:3, 97:1, 99:5, 99:12, 108:20, 108:21, 121:6, 170:19, 221:11, 221:15, 223:2, 225:17, 243:13, 258:15 shed 222:18 sheet 274:7 sheryl 48:10, 58:17, 63:5, 63:18, 68:3, 252:14,</p>	<p>253:9, 253:20, 256:5, 261:9 shielding 222:19 shorter 143:9, 143:13 shorthand 275:1 should 10:16, 17:9, 18:10, 41:16, 110:15, 267:6, 269:1 show 14:16, 70:4, 87:18, 204:16, 204:21 shown 198:8, 248:11 shows 216:5, 216:20 sign 8:5, 273:13 signature 274:10 signature-k9lvk 275:18 signed 274:7 signing 275:8 similar 137:16 simple 21:12 since 21:20, 22:4, 28:17, 155:22, 195:1, 197:11, 221:3, 239:21 single 197:20, 240:7, 242:9 singular 90:1 sit 239:10 sits 252:9</p>	<p>sitting 66:11, 177:14 six 11:20, 11:21, 14:1, 14:12, 47:12, 47:13, 47:22, 78:11, 87:8, 87:11, 88:3, 88:6, 88:9, 90:9, 92:7 skipped 117:9, 122:17 slightly 176:5 small 43:3 smattering 72:10 smilansky 55:8, 55:12, 55:20, 55:21, 67:5, 67:6, 67:8, 67:9, 70:7, 71:14, 71:19, 101:13, 101:17, 117:5, 270:5 smilansky's 43:1, 43:22, 44:4, 47:8, 67:10, 67:16, 70:5, 70:10, 70:18, 70:21, 71:1, 71:5, 71:18, 72:1, 107:8, 115:22, 116:11, 116:16, 116:21, 117:17 smooth 62:4 sole 24:7 some 11:22, 23:11, 40:20, 52:5, 54:4, 57:18, 70:16, 72:9, 75:3, 78:7,</p>
---	---	--	--

<p>79:2, 79:3, 84:6, 84:10, 89:11, 95:12, 100:21, 102:1, 102:19, 103:1, 103:11, 103:15, 104:7, 104:18, 125:1, 125:21, 159:20, 161:19, 164:19, 179:13, 182:20, 189:18, 193:16, 205:11, 226:14, 228:8, 243:3, 247:16, 253:19, 254:21, 259:21 somebody 25:10, 134:10 something 14:22, 109:3, 212:18, 238:21 sometime 196:20, 198:21, 239:3 sometimes 10:4, 186:21, 238:19, 238:20, 238:21, 260:11 somewhat 88:15 sorry 17:10, 17:15, 21:15, 26:20, 32:12, 49:1, 49:12, 50:12, 50:21, 51:9, 59:10, 63:11, 67:7, 69:1, 79:7, 80:15, 84:17, 85:9, 85:20, 85:22, 90:5, 91:5, 91:6, 96:2, 97:3, 97:16, 98:19, 99:9, 100:1, 100:11, 102:3, 102:6, 103:10, 106:20,</p>	<p>112:17, 114:4, 121:7, 124:9, 126:10, 126:16, 127:6, 130:8, 135:17, 142:22, 143:6, 145:7, 151:19, 159:10, 168:14, 168:18, 168:20, 169:1, 170:8, 188:17, 190:8, 194:6, 195:12, 200:9, 203:20, 204:19, 206:17, 207:12, 208:4, 209:4, 214:22, 215:18, 220:11, 220:19, 222:1, 240:17, 242:2, 243:6, 244:4, 247:3, 247:8, 249:17, 267:19, 272:5 sort 25:18, 61:4, 70:5, 70:12, 70:13, 71:5, 76:9, 100:16, 160:11, 239:4 source 167:21 speak 9:22, 35:17, 38:3, 46:11, 46:16, 48:3, 48:6, 50:1, 51:7, 53:9, 53:15, 55:11, 55:19, 55:20, 56:11, 65:10, 65:20, 67:6, 67:7, 67:15, 68:12, 68:21, 81:13, 82:8, 119:5, 119:10, 122:13, 122:22, 171:4, 174:5, 203:20, 270:21, 272:13, 272:17,</p>	<p>272:21, 273:4 speaking 20:2, 44:20, 71:19, 152:9, 175:13, 194:17, 260:10 speaks 213:22 specialist 4:20, 7:2, 8:14, 57:11, 57:14, 81:22, 82:3, 90:13, 90:16, 90:22, 125:13, 125:16, 173:3, 173:6, 208:14, 208:17, 244:22, 245:3, 273:14 specific 20:22, 34:8, 40:3, 42:19, 42:22, 50:5, 61:2, 73:12, 73:19, 75:19, 76:12, 78:14, 79:16, 81:17, 83:10, 83:21, 84:2, 84:8, 84:15, 85:2, 85:5, 85:11, 85:16, 86:10, 87:13, 89:13, 89:18, 94:14, 105:19, 109:5, 109:16, 122:8, 122:9, 123:10, 124:6, 124:18, 134:17, 134:19, 137:6, 147:10, 152:9, 152:12, 170:10, 196:1, 201:9, 228:11, 229:6, 231:2, 231:6, 231:7, 235:18, 236:8, 239:4, 245:18, 251:7, 254:11,</p>	<p>255:3, 255:17, 262:19, 266:18, 270:3 specifically 31:11, 33:10, 35:11, 83:20, 84:19, 85:4, 86:14, 88:17, 101:16, 122:2, 123:16, 124:5, 132:4, 136:4, 136:16, 136:20, 151:11, 155:7, 162:12, 169:15, 195:17, 196:9, 213:19, 217:2, 232:20, 235:3, 241:4, 251:17, 267:22, 272:3 specifics 40:17 specify 74:1 speculation 255:15 spell 9:5 spelled 56:22 spelling 57:2 spend 242:10 spent 128:10, 157:6, 232:17 spoke 36:11, 37:12, 37:17, 62:19, 67:4, 68:17, 69:5, 82:16, 83:11, 100:12, 119:13, 119:14, 132:5, 132:10, 190:14, 219:7 spoken 82:8 spokesperson's 246:15, 246:20</p>
--	--	---	---

<p>sshrc@state 263:21, 264:14</p> <p>st 138:21, 143:16</p> <p>staff 25:6, 36:5, 78:5, 78:18, 78:21, 110:13, 110:17, 157:22, 158:7, 159:5, 159:13, 159:14, 163:5, 187:4, 230:21, 231:12, 263:4, 264:17, 265:7, 265:10, 265:22, 267:6, 268:2</p> <p>staffs 262:9</p> <p>stand 261:13</p> <p>standard 96:10, 96:13, 137:1</p> <p>stands 262:2</p> <p>stars 127:20, 129:6, 180:17, 236:22</p> <p>start 26:5, 72:17, 167:9</p> <p>started 27:12, 30:8, 44:17, 72:14, 72:18, 73:4, 73:7, 155:15</p> <p>starting 72:22, 164:19</p> <p>state's 93:3, 222:11, 222:17, 222:20</p> <p>stated 109:7, 148:7</p> <p>statement 139:21, 209:2, 209:6, 209:11, 209:16, 211:1,</p>	<p>211:10, 212:9, 212:20, 216:22, 268:10, 268:15, 269:1</p> <p>statements 98:8, 98:10, 216:22, 222:8, 265:21, 266:13, 266:18, 269:5</p> <p>states 1:1, 2:13, 4:13, 8:3, 25:6, 93:1</p> <p>stating 261:10</p> <p>status 16:19, 17:1, 120:2, 120:4, 120:9, 120:11, 120:12, 120:14, 120:15, 121:11, 121:20, 121:21, 122:2, 122:4, 122:5, 122:15, 153:19, 154:10, 154:16, 154:22, 155:3, 161:8, 162:12, 168:17, 172:14</p> <p>stay 25:17, 27:14</p> <p>stein 19:17, 48:12, 48:15, 49:16, 50:1, 51:14, 51:21, 52:12, 52:17, 58:2, 59:19, 60:7, 62:14, 64:9, 271:22, 272:14, 272:17, 272:21, 273:4</p> <p>stein's 50:7, 51:1, 59:4</p> <p>stenographically 275:6</p> <p>step 181:6</p>	<p>stephen 3:15, 8:8, 69:14</p> <p>steps 127:20, 180:18, 236:22</p> <p>stickies 95:11</p> <p>still 11:6, 14:7, 28:2, 54:18, 144:5, 165:19, 174:7, 174:11, 216:13, 217:7, 218:1</p> <p>stop 185:18</p> <p>store 34:12</p> <p>stored 23:9</p> <p>strategic 26:19</p> <p>street 2:6, 3:8, 3:19, 4:14, 7:13</p> <p>stretched 210:21</p> <p>strike 256:2</p> <p>string 6:10, 6:13, 245:11, 245:21</p> <p>subject 15:12, 16:22, 32:6, 45:21, 108:15, 225:21, 267:8, 268:6, 269:3</p> <p>subjects 157:12</p> <p>submitted 130:14, 153:5, 176:22, 177:17, 178:21, 181:21, 181:22</p> <p>subsequent 137:8, 146:5,</p>	<p>151:16, 151:20, 224:18</p> <p>subtopic 220:4</p> <p>subtopics 201:13</p> <p>such 20:8, 98:10, 162:18, 189:17, 251:12</p> <p>suggested 92:19</p> <p>suggesting 247:14</p> <p>suggestion 42:4</p> <p>suite 3:9</p> <p>sullivan 6:11, 111:20, 130:1, 130:4, 131:7, 134:15, 135:19, 187:6, 188:3, 199:2, 199:6, 202:22, 203:5, 203:12, 207:4, 230:21</p> <p>sullivan's 104:14, 112:13, 112:15, 112:20</p> <p>summaries 11:22</p> <p>summarize 193:16, 193:22, 228:12, 231:9</p> <p>summary 5:11, 12:5, 80:14, 82:16, 82:18, 82:21, 126:11, 128:4, 227:9</p> <p>summer 45:13, 51:3, 51:5, 71:5, 73:11, 74:4, 74:11, 75:2, 75:18, 164:6, 179:1, 183:13,</p>
--	---	--	---

<p>269:17 summer-ish 72:15 sunday 216:4, 216:19, 216:20 supervisor 19:16 supplemental 135:14 sure 9:11, 10:2, 13:7, 14:5, 17:19, 17:21, 22:2, 25:1, 25:21, 33:18, 33:22, 34:7, 35:3, 35:16, 42:3, 42:8, 49:22, 50:10, 54:2, 55:6, 56:5, 57:22, 60:10, 67:14, 77:11, 80:2, 81:21, 93:18, 95:10, 100:3, 104:20, 106:5, 106:12, 107:1, 108:17, 114:6, 117:4, 118:14, 121:3, 121:16, 123:13, 124:16, 125:11, 135:6, 135:16, 137:12, 137:16, 138:9, 139:19, 142:14, 148:21, 148:22, 149:2, 151:14, 154:1, 154:19, 157:16, 160:16, 164:8, 172:6, 175:7, 177:7, 180:8, 189:1, 191:3, 192:22, 193:3, 197:3, 198:15, 200:3, 203:17, 205:2, 205:13, 206:12,</p>	<p>209:14, 212:15, 226:13, 231:5, 244:16, 244:18, 244:21, 246:4, 247:10, 258:22, 263:2, 265:12, 267:12, 272:5 surprise 136:3 surveyed 166:20 susan 17:7, 18:8, 18:14, 177:3, 177:20, 178:12, 178:16 sw 3:8 swap 41:16 swear 8:17 sworn 8:20, 9:14 system 12:14, 127:16, 127:21, 129:1, 129:7, 129:8, 150:13, 150:15, 161:12, 161:16, 167:21, 261:11, 261:16, 261:20, 262:4, 262:7, 263:10, 263:15 systems 5:19, 65:18, 100:15, 136:10, 235:13, 235:15, 263:7</p> <hr/> <p style="text-align: center;">T</p> <hr/> <p>tab 94:3, 95:5, 95:6, 99:4, 103:6, 109:19, 111:8, 111:9, 112:8, 112:10, 113:17, 115:7,</p>	<p>117:3, 117:4, 117:13, 118:16, 120:13, 120:20, 120:22, 121:15, 121:16, 123:14, 128:15, 128:17, 130:19, 130:20, 141:14, 168:12, 168:18, 169:1, 200:10, 200:12, 239:5 table 80:19, 81:4, 86:2, 86:7, 86:9, 87:1, 89:3, 92:22, 93:14, 99:2, 99:12, 99:14, 99:17, 227:15 tailored 77:20 take 29:5, 31:9, 69:19, 87:17, 88:4, 92:19, 94:19, 116:7, 118:15, 128:8, 140:13, 142:17, 155:6, 157:2, 172:22, 181:6, 194:12, 194:13, 204:3, 206:15, 217:5, 232:16, 243:8, 244:17, 247:7, 247:18, 271:18, 271:21 taken 57:13, 82:2, 90:18, 108:19, 111:3, 112:3, 113:16, 115:6, 117:5, 125:15, 154:7, 173:5, 208:16, 245:2, 275:3, 275:6 taking 7:11, 243:22 talk 73:19, 74:15,</p>	<p>75:19, 115:21, 142:15, 216:20, 233:13 talked 70:6, 83:18, 83:21, 101:10, 109:2, 230:8, 230:16, 245:18, 253:21, 253:22, 254:19, 270:4, 270:5 talking 5:20, 6:3, 6:6, 12:7, 12:12, 17:6, 18:8, 18:20, 31:11, 65:13, 71:4, 82:22, 108:21, 136:20, 142:22, 152:8, 175:13, 177:2, 177:19, 178:11, 178:16, 181:11, 181:16, 182:2, 195:4, 207:2, 207:6, 208:10, 210:3, 210:5, 216:4, 216:10, 216:12, 222:10, 223:1, 223:8, 223:17, 225:3, 225:5, 225:10, 225:22, 227:3, 227:10, 228:3, 231:5, 237:16, 244:9, 244:13, 245:14, 247:1 talks 89:14, 154:6, 247:5, 265:2 tasha 52:21, 52:22, 53:9, 54:18, 58:12, 62:16, 63:1 tasked 126:13, 126:18, 127:2, 127:4,</p>
---	--	---	--

<p>127:7, 180:11, 186:11 taskers 78:5 team 53:21, 54:1, 54:2, 227:15 technology 26:18 telephone 36:4 tell 9:18, 40:1, 41:9, 42:18, 69:22, 70:22, 125:9, 132:6, 142:1, 243:8, 267:10 telling 168:18 ten 15:11, 36:17 ten-minute 236:16 tenure 158:15, 166:8, 167:16, 262:12, 262:16, 271:12 terms 228:9 terrorism 224:16 terrorist 216:1, 216:18, 217:14, 217:17, 218:18, 218:22, 226:16 test 175:14 testified 8:20, 45:20, 108:10, 110:7, 113:3, 119:17, 130:5, 138:7, 150:20, 186:6, 249:22 testify 15:17, 16:2,</p>	<p>16:9, 16:15, 16:20, 17:2, 18:13, 18:21, 19:3, 19:8, 100:19, 119:4, 142:11, 170:15, 170:19, 196:3, 210:13, 221:6, 231:17 testifying 52:11, 122:7 testimonies 118:3 testimony 36:12, 64:13, 68:21, 70:18, 75:11, 80:22, 86:22, 87:22, 88:11, 93:8, 100:6, 101:5, 101:14, 101:19, 104:9, 105:10, 107:3, 108:6, 110:3, 110:21, 111:15, 111:22, 112:21, 113:12, 115:14, 115:18, 118:20, 119:5, 119:10, 120:1, 120:8, 121:19, 122:10, 122:14, 123:1, 123:4, 131:2, 131:6, 139:12, 143:19, 155:14, 155:21, 165:19, 174:19, 174:20, 175:14, 189:10, 190:3, 190:11, 193:20, 194:17, 195:9, 195:13, 195:20, 197:18, 198:2, 202:18, 210:1, 211:3, 211:12, 212:11, 212:22, 219:13, 221:11, 226:19, 227:19, 228:4, 229:10,</p>	<p>230:17, 235:6, 235:10, 237:11, 239:1, 240:18, 241:22, 243:14, 250:4, 254:14, 255:8, 255:13, 255:19, 271:20, 274:4, 274:6, 275:5, 275:6 tethered 225:9 th 66:4, 123:18, 126:6, 126:17, 138:12, 221:1, 221:14, 256:7, 275:13 than 17:11, 21:17, 28:17, 37:11, 38:1, 38:4, 38:6, 38:7, 38:17, 38:21, 46:9, 61:3, 65:22, 74:3, 107:11, 122:5, 143:17, 175:8, 179:8, 180:15, 181:16, 183:10, 184:11, 193:21, 227:20, 230:2, 233:21, 271:15, 273:7 thank 8:14, 9:8, 12:3, 13:12, 14:10, 18:17, 19:10, 27:4, 42:2, 47:14, 57:16, 69:3, 85:22, 95:3, 95:9, 97:9, 103:9, 108:4, 109:20, 111:10, 112:11, 117:13, 118:18, 121:2, 130:21, 159:12, 200:13, 208:6,</p>	<p>265:5 that's 9:20, 10:5, 12:10, 14:17, 17:9, 17:18, 18:2, 18:10, 24:7, 28:5, 38:6, 41:15, 48:18, 50:11, 59:15, 69:2, 71:21, 77:20, 87:19, 90:10, 90:11, 92:9, 92:11, 92:18, 97:8, 98:22, 99:10, 101:20, 104:3, 104:6, 107:16, 109:12, 111:5, 112:6, 113:15, 118:12, 119:13, 120:19, 121:8, 129:8, 138:5, 141:2, 142:18, 146:18, 151:10, 155:18, 159:9, 159:11, 175:7, 179:22, 186:18, 187:7, 194:3, 197:2, 199:3, 199:14, 200:9, 203:15, 203:16, 206:8, 207:19, 213:8, 214:4, 216:14, 220:18, 223:3, 224:1, 224:21, 229:17, 230:5, 230:14, 231:15, 236:16, 243:12, 246:22, 247:1, 249:3, 249:7, 257:16, 261:1, 262:5, 264:1, 265:12, 271:9, 271:14, 273:10 their 24:22, 25:6, 31:14, 114:12,</p>
--	---	---	---

<p>137:6, 150:12, 189:18, 189:19, 193:19, 222:14, 233:19, 260:9, 262:9, 263:6 them 9:13, 10:10, 12:2, 13:10, 14:3, 15:13, 20:15, 21:4, 21:9, 21:10, 25:16, 25:19, 34:14, 42:6, 74:12, 81:5, 81:7, 81:11, 81:18, 88:4, 89:22, 90:3, 91:7, 92:10, 92:17, 92:20, 99:21, 100:2, 100:3, 147:21, 166:3, 167:9, 167:10, 177:13, 178:17, 183:22, 184:20, 184:22, 185:6, 188:11, 193:9, 193:16, 194:4, 194:5, 196:14, 206:2, 217:10, 228:9, 228:10, 228:11, 230:7, 231:9, 231:11, 233:13, 238:21, 239:3, 251:17, 255:18, 269:19 themes 88:14 themselves 7:15 then 10:7, 10:12, 11:1, 11:10, 12:12, 12:17, 14:3, 15:22, 16:6, 16:11, 16:22, 19:1, 22:15, 23:10,</p>	<p>23:11, 24:1, 24:2, 24:17, 27:17, 30:4, 30:6, 32:14, 34:5, 35:4, 40:7, 41:22, 49:15, 58:6, 58:8, 58:9, 58:21, 64:11, 64:15, 78:4, 89:8, 89:14, 89:17, 115:1, 121:20, 138:9, 143:10, 144:9, 144:20, 150:11, 151:13, 159:4, 178:2, 185:8, 189:12, 192:15, 197:12, 202:1, 206:16, 207:5, 207:8, 216:3, 217:6, 219:17, 220:5, 223:15, 223:17, 244:4, 260:20, 265:11, 268:1, 268:14, 273:15 there's 11:7, 14:22, 23:7, 80:19, 96:22, 138:11, 192:15, 204:1, 211:6 thereafter 179:17, 275:7 therein 98:11 these 12:19, 13:2, 13:8, 14:12, 21:19, 21:22, 28:17, 32:17, 32:18, 41:19, 45:21, 46:7, 47:19, 64:6, 64:8, 80:21, 91:21, 99:19, 109:9, 111:13,</p>	<p>122:1, 131:15, 138:14, 138:16, 147:15, 183:17, 184:17, 188:7, 213:8, 224:5, 269:5 they 7:15, 10:10, 10:11, 10:12, 11:17, 11:21, 11:22, 17:19, 21:6, 22:3, 22:5, 22:6, 22:9, 23:22, 24:5, 24:8, 24:10, 24:15, 25:17, 32:11, 43:3, 43:4, 43:6, 51:8, 52:4, 54:3, 78:8, 93:21, 94:14, 100:4, 101:2, 106:4, 113:19, 127:7, 129:17, 133:1, 133:4, 133:6, 133:7, 136:4, 137:16, 137:20, 149:21, 150:12, 150:21, 150:22, 153:1, 162:6, 163:20, 164:18, 164:19, 166:20, 166:21, 167:8, 167:9, 170:1, 171:6, 172:14, 175:12, 176:3, 180:12, 180:13, 180:14, 180:17, 184:22, 185:21, 187:14, 194:18, 205:6, 207:3, 207:5, 219:4, 233:18, 234:10, 236:1, 247:1, 247:5, 255:4, 256:11, 260:9, 271:7</p>	<p>they're 13:4, 13:9, 20:7, 22:5, 22:7, 24:17, 79:10, 80:13, 89:7, 90:9, 123:17 thian 52:21, 52:22, 53:9, 54:18, 58:12, 62:16, 63:1 thing 86:4, 108:22, 244:2, 244:9, 244:14 things 82:6, 123:22, 153:20, 172:12, 183:7, 193:10, 193:18, 212:15, 230:11, 259:17, 264:3 think 14:20, 14:22, 23:4, 25:9, 25:19, 25:22, 30:6, 30:8, 32:12, 39:5, 41:7, 42:15, 43:6, 44:17, 44:19, 46:13, 47:8, 49:7, 49:8, 51:4, 52:1, 52:4, 52:8, 52:10, 54:22, 57:16, 69:12, 69:13, 69:14, 69:18, 70:3, 72:18, 74:12, 76:3, 82:5, 83:20, 85:4, 86:3, 90:2, 98:22, 99:5, 100:13, 104:1, 104:6, 106:15, 106:17, 107:13, 107:16,</p>
---	---	---	--

<p>114:10, 116:9, 119:1, 119:8, 119:14, 122:11, 122:17, 128:9, 133:17, 145:10, 147:22, 149:21, 150:8, 151:11, 152:5, 152:15, 154:14, 155:11, 162:4, 172:12, 179:22, 180:15, 183:7, 186:6, 189:6, 192:13, 205:2, 205:18, 207:10, 209:21, 216:2, 217:4, 218:14, 218:21, 226:4, 233:16, 234:12, 241:20, 243:5, 244:1, 244:8, 247:7, 249:18, 253:18, 254:2, 256:11, 256:13, 258:4, 269:13, 273:10, 273:11 thinking 122:2 third 3:8, 12:13, 21:13, 32:14, 144:20, 200:15, 201:2, 201:13, 202:12, 267:22 those 11:16, 14:2, 18:19, 18:20, 47:22, 64:3, 84:3, 99:3, 99:21, 101:1, 103:18, 105:9, 106:2, 110:1, 114:11, 119:1, 120:7, 125:1, 125:7, 127:5, 132:3, 136:8, 137:22, 146:2, 166:19, 169:16,</p>	<p>178:3, 178:4, 179:15, 179:16, 182:11, 182:19, 182:20, 184:2, 185:5, 185:13, 185:15, 185:20, 185:21, 187:9, 187:12, 188:16, 188:21, 190:18, 190:20, 191:6, 193:4, 197:17, 205:5, 223:3, 224:11, 225:12, 241:11, 248:3, 251:6, 255:11, 255:16, 260:2 though 103:9, 144:4, 148:9, 224:2 thought 70:14, 72:7, 118:14, 240:15, 248:19, 267:19 thousand 17:9, 21:17, 34:9, 93:12, 131:12 three 37:22, 47:20, 138:14, 157:6, 179:21, 198:21, 201:13, 219:11, 238:3, 238:7, 242:13, 260:18 through 1:12, 15:13, 29:7, 30:5, 42:10, 49:4, 54:4, 64:1, 70:6, 77:12, 78:1, 83:4, 88:6, 90:8, 90:19, 91:6, 91:14, 92:6, 92:10, 92:20, 114:11, 118:13, 133:4, 138:20, 138:22, 140:2,</p>	<p>142:5, 142:21, 143:15, 143:21, 144:4, 144:6, 144:13, 161:7, 163:4, 164:19, 166:14, 166:20, 167:2, 167:10, 179:18, 183:13, 184:7, 189:3, 189:15, 192:16, 194:14, 196:13, 206:15, 207:4, 228:2, 239:11, 240:5, 240:6, 244:11, 250:19, 251:7, 251:14, 253:3, 253:10, 253:11, 267:7, 269:2, 271:15 throughout 157:20, 158:5, 263:9 tillery 107:19, 108:1, 121:4, 121:6, 135:10, 146:10, 146:19, 147:18, 148:3 tillery's 107:18, 114:16, 115:1, 115:9, 115:12, 117:21 time 7:8, 10:10, 23:9, 31:1, 36:11, 41:2, 41:5, 42:19, 53:2, 53:3, 61:3, 69:5, 71:3, 72:7, 72:12, 73:12, 121:9, 125:10, 129:9, 133:1, 136:1, 143:10, 143:11, 143:13, 158:12, 159:1, 159:18, 160:10, 160:11, 161:9,</p>	<p>161:13, 161:20, 162:6, 162:13, 163:3, 164:6, 169:11, 171:12, 177:8, 180:17, 182:5, 183:1, 183:11, 183:21, 184:5, 184:12, 184:16, 184:19, 184:22, 185:5, 185:10, 185:19, 195:14, 197:16, 216:9, 216:16, 217:19, 226:21, 236:6, 238:12, 239:13, 240:16, 241:4, 246:19, 247:8, 251:22, 258:1, 259:17, 261:21 timeline 5:16, 5:20, 12:12, 12:17, 165:4, 231:22, 232:2, 232:5, 232:8, 232:10, 237:16, 238:22, 240:10, 256:19 timelines 11:22, 41:8, 240:6, 242:3, 242:5, 242:11 times 136:22, 196:16, 230:10, 238:11, 239:11 timing 192:15, 195:5, 195:8, 209:14, 244:11, 245:18 title 19:11, 19:18, 55:6, 102:8 today 7:10, 8:15, 9:16, 9:20, 11:16, 13:14, 15:13, 15:19,</p>
--	---	--	--

<p>16:5, 16:9, 16:15, 16:20, 17:2, 18:21, 19:3, 19:8, 33:16, 35:19, 36:3, 36:13, 37:3, 37:9, 37:13, 37:18, 38:18, 38:21, 46:12, 47:1, 47:16, 48:1, 48:7, 50:2, 53:10, 53:16, 56:12, 56:20, 57:8, 64:2, 65:11, 65:22, 66:11, 83:13, 86:13, 89:1, 103:9, 113:22, 115:14, 131:2, 151:4, 157:11, 177:15, 178:1, 178:19, 179:7, 189:10, 189:22, 190:11, 191:16, 193:6, 194:6, 195:20, 196:3, 198:2, 198:13, 202:19, 210:1, 210:15, 211:13, 212:11, 226:19, 228:17, 229:10, 231:17, 235:6, 235:10, 237:11, 239:2, 240:13, 241:22, 242:8, 248:13, 248:15, 248:20, 249:9, 249:11, 249:13, 250:9, 250:15, 251:12, 255:8, 255:13, 255:19, 263:13, 266:8, 271:1 today's 7:8, 114:13, 132:11, 252:11, 254:14, 271:19</p>	<p>together 89:11 told 70:1, 134:19, 173:12, 173:13, 173:16, 175:15, 215:16, 255:21 tom 56:14, 56:15 too 43:6, 83:20, 117:14, 259:22 took 47:9, 83:4, 171:20, 172:4, 245:11, 246:22, 247:4 top 43:20, 80:9, 97:2, 97:5, 101:7, 102:12, 105:7, 129:12, 180:18, 198:17, 263:6 topic 15:17, 16:3, 16:11, 16:16, 16:20, 17:3, 18:7, 18:18, 18:20, 18:21, 19:1, 19:3, 19:8, 31:21, 32:3, 32:8, 32:14, 77:13, 77:15, 78:14, 80:8, 80:22, 86:15, 86:20, 87:13, 87:18, 88:18, 88:19, 101:22, 104:16, 106:8, 108:13, 119:21, 122:10, 122:18, 123:1, 123:9, 123:16, 189:21, 190:4, 193:20, 201:12, 201:17, 208:8, 210:7, 210:18,</p>	<p>213:19, 214:8, 219:21, 220:3, 221:3, 223:12, 224:8, 224:22, 255:3, 255:7, 258:12 topics 15:12, 17:12, 17:17, 33:2, 39:11, 40:7, 46:7, 80:11, 124:8, 181:15, 202:2, 208:8, 208:21, 210:1, 213:5, 213:9, 213:14, 219:11, 224:5, 266:17 touch 40:13 touched 39:21 tp 5:12, 12:6, 12:7, 126:12, 128:5 tracking 129:6 trained 28:21 training 26:2, 29:2, 29:4, 29:6, 29:9, 29:12, 29:20, 30:4, 30:7, 30:12, 30:14, 30:17, 30:19, 31:9, 31:17, 32:10, 33:5 transcribed 9:20, 10:15 transcript 5:6, 36:18, 42:5, 42:7, 43:22, 44:5, 45:15, 46:21, 67:10, 67:13, 67:17, 67:20,</p>	<p>68:1, 68:4, 68:7, 68:10, 68:14, 71:18, 75:14, 95:5, 107:12, 109:10, 110:2, 110:9, 110:20, 111:14, 111:20, 111:21, 112:3, 113:4, 113:8, 113:11, 113:15, 115:2, 115:3, 115:13, 116:2, 116:4, 116:5, 116:11, 116:16, 116:18, 117:5, 117:17, 118:10, 118:11, 221:13, 275:4 transcription 274:5 transcripts 47:4, 104:15 transparent 92:12, 183:15, 221:9 traveling 263:6 trawling 224:3 tried 108:22, 109:1 tries 184:1 true 158:4, 158:17, 173:22, 192:3, 197:13, 215:16, 215:19, 274:4, 275:4 truthfully 9:16 try 102:9, 140:8, 171:19, 172:3, 172:8, 186:2, 197:7, 243:5 trying 10:1, 32:9,</p>
---	---	--	--

<p>69:12, 92:8, 103:8, 104:1, 115:16, 197:9, 267:17, 272:10 ts 127:21 tv 225:7 twice 244:9 two 17:9, 21:11, 30:8, 34:9, 36:22, 75:15, 93:12, 96:22, 131:12, 146:15, 147:5, 147:8, 147:10, 147:13, 147:16, 149:18, 150:17, 152:18, 152:22, 153:3, 156:5, 156:7, 156:19, 159:18, 172:12, 186:9, 189:17, 196:21, 197:11, 199:21, 205:10, 205:13, 206:2, 207:17, 207:18, 219:12, 232:6, 238:3, 244:10, 264:17, 265:7, 265:10, 265:22, 268:3 type 22:8, 23:10, 23:13, 24:3, 60:12, 70:16, 133:3, 137:16, 201:1, 202:11, 231:7, 238:15 types 25:15 typewriting 275:7 typically 135:7 typo 17:9, 18:10</p>	<p style="text-align: center;">U</p> <p>uh-huh 23:5, 59:18, 71:21, 126:1, 139:14, 192:19, 221:21, 222:9 un 17:7, 18:8 unavoidably 222:12 uncertainty 216:14 unclear 133:6, 205:5 under 20:9, 20:14, 22:1, 24:6, 27:1, 34:14, 60:15, 97:6, 99:2, 105:7, 158:18, 161:4, 200:19, 257:5, 257:15, 262:9, 275:7 underlying 224:6 understand 10:20, 10:22, 22:2, 24:12, 25:1, 32:7, 32:9, 38:14, 38:16, 46:21, 48:3, 50:10, 61:7, 73:8, 93:18, 100:14, 103:7, 122:6, 131:17, 135:16, 156:13, 167:18, 197:3, 197:8, 197:9, 201:11, 212:6, 214:2 understanding 19:6, 51:5, 51:13, 51:15, 52:14, 55:22, 65:16, 70:13, 71:1, 72:1,</p>	<p>72:9, 72:13, 73:8, 86:19, 138:5, 179:7, 179:8, 182:14, 183:6, 184:3, 186:18, 206:8, 210:8, 210:14, 210:20, 211:4, 211:14, 212:13, 213:1, 213:15, 214:1, 217:16, 217:19, 218:5, 219:15, 222:11, 223:9, 223:10, 225:1, 225:11, 226:14, 226:20, 230:19, 230:20, 233:22, 234:20, 254:9, 254:15, 255:16, 255:20, 255:22, 265:3, 272:1, 272:14 understandings 51:12, 193:18, 218:12 understood 11:2, 109:4, 217:22, 226:15 undertake 226:19 undertook 128:7, 145:6 uneven 183:6 united 1:1, 2:13, 4:13, 8:2 unless 11:7 unredacted 81:5, 81:8, 81:11, 99:3, 99:18, 191:14, 202:18, 255:6 unresponsive 207:15 unsearched 222:16</p>	<p>until 147:3, 167:10, 169:16, 178:15, 185:10 up-to-date 219:6 updated 241:3 upon 126:14, 126:15, 251:10 usage 51:13 use 5:15, 5:17, 12:17, 12:18, 16:8, 23:18, 32:16, 40:11, 41:4, 41:6, 41:12, 42:18, 45:1, 45:6, 51:16, 56:1, 63:14, 65:1, 65:18, 89:15, 101:22, 103:2, 103:11, 103:14, 104:11, 105:12, 107:5, 108:8, 109:8, 110:5, 111:1, 111:17, 112:2, 113:1, 113:14, 115:20, 118:22, 119:7, 119:12, 119:15, 158:19, 159:7, 159:15, 160:9, 163:6, 163:10, 165:5, 183:3, 192:5, 192:12, 193:12, 195:16, 229:16, 230:9, 231:10, 232:1, 262:10, 263:11, 264:19, 265:9, 268:3, 272:1, 272:15 used 23:8, 24:2,</p>
--	---	---	---

<p>40:19, 74:9, 76:1, 137:1, 138:15, 142:20, 143:7, 143:13, 144:3, 144:11, 145:1, 158:1, 158:8, 162:2, 162:5, 162:20, 163:16, 178:16, 181:11, 183:8, 206:7, 210:6, 228:10, 260:11, 262:11, 262:15, 264:2 uses 258:5, 260:6 using 70:16, 109:2, 109:6, 158:1, 158:7, 158:13, 159:19, 159:20, 161:18, 177:11, 259:20, 260:11 usually 136:10 usun 133:2, 137:15, 138:11, 205:7</p>	<p>234:17, 235:2, 236:11, 237:6, 239:8, 240:2, 241:10 version 238:6, 238:13, 239:15, 239:19, 241:15, 241:20 versions 238:8 versus 109:13, 232:21 very 40:16, 77:20, 210:18, 210:19, 221:9, 223:12 via 135:12, 135:13 video 4:20, 7:2, 7:9, 7:11, 8:14, 57:11, 57:14, 81:22, 82:3, 90:13, 90:16, 90:22, 125:13, 125:16, 173:3, 173:6, 208:14, 208:17, 215:18, 216:4, 226:11, 226:22, 244:22, 245:3, 273:14 videographer 7:10 videotaped 1:11, 2:1, 7:3 view 218:14 voice-identify 7:14 volume 165:9, 165:21</p>	<p>wagner 56:22 wait 94:5 waiting 52:5 walter 48:10, 58:17, 63:5, 63:18, 159:18, 162:18, 252:14, 253:10, 253:20, 256:5, 258:10, 258:20, 261:9 walter's 68:3 want 14:5, 15:13, 38:13, 41:1, 42:5, 42:13, 43:10, 57:20, 66:14, 77:12, 86:1, 86:18, 87:16, 88:4, 89:22, 90:12, 90:13, 91:19, 94:19, 106:14, 106:21, 108:14, 120:15, 125:20, 127:9, 142:17, 163:3, 169:3, 181:17, 194:16, 194:19, 206:15, 208:7, 225:18, 227:4, 243:16, 246:2, 251:18, 266:18 wanted 17:21, 37:7, 65:17, 86:6, 89:9, 100:14, 173:9, 230:18, 233:11 washington 1:14, 2:7, 3:10, 3:20, 4:7, 4:15, 7:13 wasn't 79:18, 105:19,</p>	<p>106:13, 132:21, 149:22, 150:1, 164:1, 164:2, 169:16, 215:17, 226:11, 251:7 wasser 36:7, 36:12, 37:11, 38:1, 46:10, 65:17, 65:22, 76:15, 79:6, 79:9, 82:9, 100:12, 101:4, 101:9, 113:10, 113:15, 128:1, 128:7, 128:18, 129:14, 129:21, 130:2, 131:5, 131:10, 132:5, 132:10, 133:9, 133:18, 138:19, 139:12, 139:16, 139:18, 139:21, 140:6, 140:10, 140:20, 141:10, 142:11, 142:19, 143:8, 143:13, 143:19, 144:2, 147:12, 149:3, 149:9, 149:14, 153:3, 157:6, 205:3, 233:17, 233:22, 236:13, 236:20, 237:3, 263:14, 264:10 wasser's 80:3, 107:7, 113:21, 114:19, 137:4 watch 1:4, 3:7, 6:3, 6:6, 7:5, 7:17, 7:19, 7:21, 16:12, 89:8, 89:16, 91:22, 92:4, 100:17, 109:13, 120:6, 122:21, 123:5,</p>
<p>V</p>			
<p>variation 57:1 variety 26:16 various 78:6, 78:16, 116:19, 123:8, 161:17, 193:10, 193:18, 228:10, 239:13, 240:6, 241:13, 245:13 vaughn 153:22, 154:1, 154:15, 154:18, 154:21 verbal 10:16 verify 197:1, 197:12,</p>	<p>via 135:12, 135:13 video 4:20, 7:2, 7:9, 7:11, 8:14, 57:11, 57:14, 81:22, 82:3, 90:13, 90:16, 90:22, 125:13, 125:16, 173:3, 173:6, 208:14, 208:17, 215:18, 216:4, 226:11, 226:22, 244:22, 245:3, 273:14 videographer 7:10 videotaped 1:11, 2:1, 7:3 view 218:14 voice-identify 7:14 volume 165:9, 165:21</p>	<p>wagner 56:22 wait 94:5 waiting 52:5 walter 48:10, 58:17, 63:5, 63:18, 159:18, 162:18, 252:14, 253:10, 253:20, 256:5, 258:10, 258:20, 261:9 walter's 68:3 want 14:5, 15:13, 38:13, 41:1, 42:5, 42:13, 43:10, 57:20, 66:14, 77:12, 86:1, 86:18, 87:16, 88:4, 89:22, 90:12, 90:13, 91:19, 94:19, 106:14, 106:21, 108:14, 120:15, 125:20, 127:9, 142:17, 163:3, 169:3, 181:17, 194:16, 194:19, 206:15, 208:7, 225:18, 227:4, 243:16, 246:2, 251:18, 266:18 wanted 17:21, 37:7, 65:17, 86:6, 89:9, 100:14, 173:9, 230:18, 233:11 washington 1:14, 2:7, 3:10, 3:20, 4:7, 4:15, 7:13 wasn't 79:18, 105:19,</p>	<p>106:13, 132:21, 149:22, 150:1, 164:1, 164:2, 169:16, 215:17, 226:11, 251:7 wasser 36:7, 36:12, 37:11, 38:1, 46:10, 65:17, 65:22, 76:15, 79:6, 79:9, 82:9, 100:12, 101:4, 101:9, 113:10, 113:15, 128:1, 128:7, 128:18, 129:14, 129:21, 130:2, 131:5, 131:10, 132:5, 132:10, 133:9, 133:18, 138:19, 139:12, 139:16, 139:18, 139:21, 140:6, 140:10, 140:20, 141:10, 142:11, 142:19, 143:8, 143:13, 143:19, 144:2, 147:12, 149:3, 149:9, 149:14, 153:3, 157:6, 205:3, 233:17, 233:22, 236:13, 236:20, 237:3, 263:14, 264:10 wasser's 80:3, 107:7, 113:21, 114:19, 137:4 watch 1:4, 3:7, 6:3, 6:6, 7:5, 7:17, 7:19, 7:21, 16:12, 89:8, 89:16, 91:22, 92:4, 100:17, 109:13, 120:6, 122:21, 123:5,</p>
<p>W</p>			
<p>w-a-g-g-e-n-e-r 57:2 w-a-g-n-e-r 57:1 waggener 57:1</p>			

<p>138:1, 151:15, 151:21, 152:1, 153:17, 153:21, 155:16, 157:14, 161:10, 161:11, 162:14, 162:15, 166:12, 167:14, 179:1, 183:10, 194:10, 208:1, 223:19, 224:1, 224:2, 224:4, 225:13, 250:21 watch's 81:14, 124:11, 124:20, 125:22, 126:21, 127:3, 137:10, 182:6, 225:9 way 10:22, 19:11, 61:12, 88:20, 89:6, 97:19, 149:17, 174:21, 211:20 we'll 9:13, 13:16, 14:3, 25:22, 41:22, 226:3, 226:6 we're 11:11, 14:1, 17:22, 49:6, 90:2, 92:11, 122:18, 136:20, 195:4, 208:20, 208:21, 240:17, 244:8, 244:13, 256:2, 263:19 we've 120:22, 123:19, 123:20, 172:20, 188:11, 221:10 wednesday 1:15 week 196:20, 232:9, 234:12, 234:13, 235:22, 236:2,</p>	<p>236:5, 236:6 weeks 36:22, 37:22, 47:20, 75:15, 197:11, 197:17, 198:21, 227:19, 232:6, 234:9, 238:3, 238:7, 252:13 weismann 256:6 well 10:1, 27:5, 31:22, 32:7, 33:20, 34:1, 49:21, 57:18, 60:19, 78:3, 84:6, 84:21, 87:15, 97:18, 106:13, 119:3, 120:1, 120:5, 127:4, 131:4, 134:6, 138:13, 138:14, 139:15, 140:9, 146:17, 147:5, 155:20, 158:3, 159:22, 170:15, 186:16, 189:9, 194:6, 194:16, 195:22, 196:7, 210:18, 222:14, 223:5, 231:12, 233:16, 239:10, 242:8, 243:11, 268:20, 269:18 went 76:3, 76:11, 196:15, 228:2, 230:9, 238:10, 238:12, 240:5, 240:6, 247:15 weren't 80:1, 106:10, 164:8, 189:5 what's 14:17, 23:21, 34:18, 53:22,</p>	<p>54:1, 82:18, 99:20, 140:17, 148:12, 192:20, 201:10, 227:7, 228:1, 254:5, 271:3 whatever 88:19 whatever's 47:8 whenever 140:12 where 21:16, 24:10, 24:16, 27:17, 28:6, 63:1, 63:18, 65:6, 83:2, 96:15, 96:18, 99:11, 105:6, 108:20, 139:9, 141:9, 148:2, 148:19, 149:13, 157:19, 165:6, 168:17, 193:17, 200:16, 204:4, 206:14, 245:13, 257:9, 258:5, 258:14, 258:18, 260:11 whereof 275:12 whether 37:7, 44:3, 46:4, 71:10, 71:12, 74:1, 133:6, 133:12, 133:19, 148:8, 148:14, 148:15, 148:22, 149:3, 149:4, 149:12, 156:18, 171:6, 171:17, 173:11, 173:12, 173:22, 174:1, 174:14, 175:2, 175:16, 179:15, 185:13, 185:15, 189:16, 194:22, 195:2,</p>	<p>197:9, 202:14, 205:22, 206:1, 212:7, 218:4, 248:9, 254:15, 256:4, 257:11, 263:14, 269:9, 270:10 which 31:21, 34:8, 34:11, 41:10, 43:21, 47:6, 52:6, 52:9, 59:13, 65:9, 78:13, 80:11, 83:12, 87:10, 87:18, 95:1, 104:8, 109:21, 111:8, 115:7, 116:22, 117:10, 120:7, 127:20, 129:2, 129:6, 130:18, 132:1, 132:3, 138:8, 144:21, 146:20, 161:9, 162:5, 163:13, 180:14, 188:14, 193:3, 195:1, 195:3, 196:9, 201:13, 206:9, 207:13, 207:14, 207:21, 219:1, 219:20, 223:18, 227:14, 239:4, 239:5, 243:7, 251:6, 254:3, 254:22, 259:1, 260:5, 264:22, 267:13, 267:17, 267:18, 268:5, 268:7 while 40:11, 43:11, 76:2, 83:19, 161:21, 166:12, 167:4, 168:4, 169:9, 174:10, 183:4, 185:14, 197:19, 204:12,</p>
--	--	--	--

<p>206:7, 239:10, 248:7, 252:1, 259:11 white 251:21, 252:8, 253:16, 253:18, 254:3, 254:7, 254:11, 254:16, 254:20 whitehead 1:22, 2:12, 8:16, 275:2 who 19:16, 27:5, 27:8, 29:6, 30:17, 31:12, 33:13, 33:21, 34:2, 34:5, 35:1, 35:7, 35:13, 35:16, 36:6, 37:12, 37:16, 38:1, 38:13, 38:17, 38:21, 46:10, 52:21, 53:12, 56:4, 56:15, 57:4, 58:15, 62:6, 62:11, 62:13, 63:22, 69:10, 69:12, 71:12, 78:21, 82:7, 88:22, 101:1, 110:12, 110:16, 119:4, 119:9, 122:13, 127:22, 131:22, 134:3, 134:11, 135:4, 135:6, 135:9, 135:14, 135:17, 136:18, 140:16, 150:22, 159:14, 159:18, 160:1, 160:3, 160:6, 170:6, 175:15, 178:9, 182:13, 218:10, 227:12, 230:8, 230:22, 231:10,</p>	<p>231:11, 231:13, 232:2, 234:5, 235:17, 237:21, 242:20, 247:20, 248:1, 251:20, 252:1, 253:22, 256:13, 263:6, 268:17 who's 62:20, 186:19, 248:3 whole 116:17 whom 7:15, 253:22, 254:1, 275:2 whose 176:8 why 9:15, 14:11, 24:8, 25:13, 41:18, 41:21, 46:2, 49:10, 49:13, 50:4, 81:13, 89:20, 92:9, 92:19, 121:8, 132:20, 133:16, 135:22, 144:2, 147:20, 148:12, 148:22, 149:13, 156:11, 156:15, 156:16, 163:18, 166:18, 167:1, 167:12, 167:20, 169:5, 169:6, 170:13, 171:1, 175:10, 178:21, 180:9, 185:8, 188:10, 203:18, 204:3, 209:20, 216:3, 216:14, 233:12, 259:8, 260:20, 261:4 will 8:5, 10:1, 11:1, 14:7, 15:12, 194:12,</p>	<p>220:5, 273:12 wisecarver 56:4, 56:12, 57:7 wished 82:6 withdraw 98:21, 166:22, 194:7, 215:18 within 21:2, 34:11, 36:22, 41:1, 42:19, 53:18, 54:9, 54:12, 54:22, 57:19, 137:5, 150:9, 150:12, 196:20, 198:21, 218:2, 219:11, 219:18, 225:15, 243:10, 256:5, 266:19 without 88:6, 134:21, 194:17 witness 8:5, 8:18, 18:1, 18:4, 38:12, 41:20, 57:22, 82:7, 95:11, 98:2, 121:2, 141:15, 155:9, 168:11, 168:15, 168:21, 173:8, 173:10, 174:19, 199:21, 200:2, 225:11, 265:2, 265:5, 273:8, 273:12, 275:12 witnesses 264:9 word 258:5 work 83:22, 109:4, 109:8, 185:14, 254:10 worked 28:16, 230:22,</p>	<p>231:13, 263:2 working 22:21, 26:5, 43:5, 74:2, 179:9, 239:14, 248:13, 269:19 world 22:14 would 7:14, 8:17, 9:15, 10:1, 10:4, 10:9, 13:5, 24:8, 25:9, 25:13, 25:17, 25:19, 31:4, 31:15, 31:22, 33:15, 33:17, 34:15, 35:11, 43:19, 46:14, 49:2, 49:4, 49:14, 57:20, 60:17, 61:3, 61:12, 61:15, 61:19, 62:8, 66:20, 75:3, 78:8, 84:5, 93:19, 94:4, 94:11, 96:12, 116:7, 117:3, 125:10, 129:3, 133:18, 134:10, 135:6, 135:7, 135:11, 138:8, 140:2, 140:13, 150:16, 159:1, 164:4, 164:14, 165:11, 171:15, 173:1, 178:2, 178:9, 178:10, 180:13, 180:14, 183:18, 194:11, 195:18, 206:12, 206:14, 207:20, 207:21, 213:13, 213:19, 214:13, 217:9, 228:4, 230:16, 230:18, 237:14,</p>
---	---	--	---

<p>246:3, 253:4, 267:6, 268:5, 268:6, 268:7, 269:2, 269:16, 269:18, 270:17 wouldn't 91:17, 161:16, 183:14, 184:13, 190:2 writing 139:16, 139:22 written 41:19, 148:2 wrong 168:19 wrote 148:13, 149:11, 204:7, 217:19</p>	<p style="text-align: center;">Y</p>	<p>yeah 41:17, 42:15, 88:2, 90:7, 90:10, 90:15, 98:5, 108:15, 141:20, 152:9, 168:16, 173:2, 200:2, 200:4, 208:13, 209:8, 215:10, 222:3, 222:21, 243:15, 244:13 year 28:10, 28:18, 29:21, 30:2, 49:8, 58:8, 102:14, 136:3 years 25:17, 25:18, 30:8, 58:14, 263:3 yesterday 240:5, 242:4, 242:6, 242:12 yet 185:5, 188:9, 222:10 you'd 214:12</p>	<p style="text-align: center;">1</p>	<p>you're 17:11, 41:9, 41:10, 43:9, 43:11, 52:11, 97:5, 111:8, 112:9, 121:15, 122:7, 128:2, 128:15, 168:15, 178:1, 178:4, 192:20, 196:1, 214:7, 215:12, 220:15, 231:5, 235:5, 235:9, 237:10, 244:9, 255:2, 259:2, 267:10, 267:15, 272:9 you've 119:17, 138:7, 198:8, 243:21 yours 14:7 yourself 242:14, 271:17</p>	<p style="text-align: center;">0</p>	<p>01242 1:7, 7:7 02 82:4, 125:14 04 57:12 05 273:16, 273:17 05831334 198:17 06 173:4 09 1:16, 7:9, 245:1</p>	<p style="text-align: center;">1</p>	<p>130:20, 138:12, 168:12, 200:12, 209:12, 210:7, 221:4 11 6:7, 17:2, 57:12, 57:15, 82:1, 109:22, 111:9, 112:10, 113:16, 115:7, 117:4, 117:6, 142:4, 177:4, 177:21, 180:21, 204:6, 209:3, 209:9, 209:13, 209:18, 211:12, 212:10, 212:20, 215:21, 217:1, 218:7, 218:18, 220:20, 223:13, 253:3 1100 2:6, 3:19, 7:13 117 117:8 118 117:8 12 6:8, 6:12, 16:12, 82:4, 90:17, 91:1, 113:17, 120:20, 122:20, 123:5, 123:18, 145:16, 145:19, 145:22, 146:5, 151:14, 151:21, 153:15, 165:15, 166:7, 166:15, 167:14, 169:9, 169:10, 184:9, 185:5, 209:9, 214:17, 215:5, 219:4, 222:2, 256:7 13 6:9, 18:11, 90:20, 91:6, 91:14, 105:2,</p>	<p style="text-align: center;">1</p>	<p>107:22, 109:14, 114:11, 115:7, 118:13, 118:16, 125:14, 125:17, 221:20, 221:22 1363 109:14 14 1:7, 5:11, 6:10, 6:15, 7:7, 52:10, 66:20, 69:4, 70:1, 117:5, 126:6, 126:16, 198:6, 198:9, 200:5, 200:9, 200:12, 200:15, 202:12, 202:22, 204:4, 206:6, 206:11, 207:14, 220:19, 275:17 15 5:8, 6:13, 173:4, 173:7, 200:5, 213:11, 221:19, 226:5, 246:7, 246:8, 246:9, 248:8 16 17:8, 18:9, 18:14, 112:4, 208:15, 208:18 17 97:7, 146:11, 146:18, 147:17, 148:4, 148:8, 148:14, 149:19, 150:18, 150:21, 151:10, 151:12, 152:3, 152:6, 152:12, 152:19, 156:5, 156:20, 157:3, 245:1, 245:4 179 113:20 18 48:22, 49:5,</p>
--	---	---	---	--	---	--	---	---	---	---

<p>200:6, 273:16 181 111:12 182 111:12 183 111:12 184 111:12 19 1:15, 7:8, 91:1, 208:15, 221:1, 275:13 198 6:10 1987 26:7, 26:9 1st 138:20, 143:15, 144:12</p>	<p>2010 264:17, 265:7 2011 33:14, 58:18, 253:3, 268:11, 268:18, 269:7 2012 16:1, 18:11, 18:14, 54:16, 98:12, 100:7, 100:20, 138:20, 138:21, 142:5, 142:21, 143:15, 143:16, 144:3, 144:4, 144:12, 177:4, 177:21, 199:13, 203:7, 203:14, 204:5, 209:3, 209:7, 209:13, 209:18, 211:12, 212:11, 212:20, 214:17, 215:5, 215:21, 217:1, 218:7, 218:18, 219:5, 253:11, 256:7 2013 17:8, 18:9, 33:14, 34:3, 34:9, 35:2, 35:10, 35:14, 44:16, 54:13, 54:16, 55:4, 58:5, 58:21, 59:5, 59:21, 60:8, 60:22, 64:15, 71:6, 72:3, 143:21, 144:5, 144:6, 159:2, 159:4, 160:11, 163:4, 253:11, 261:10, 261:18, 263:16 2015 17:1, 33:21, 78:2, 128:8, 130:15, 169:2, 170:9, 187:15,</p>	<p>205:11 2016 58:6, 58:9, 59:5, 61:18, 62:1, 62:7, 62:11, 62:14, 93:5, 93:13, 94:2, 94:17, 95:22, 97:21, 98:8, 105:2, 108:20, 111:3, 200:7, 265:16, 266:5, 267:2 2017 30:9, 49:4, 58:10 2018 29:21, 49:4 2019 1:15, 7:8, 28:12, 30:2, 30:3, 49:3, 107:22, 112:4, 113:16, 115:7, 117:6, 178:19, 213:11, 220:20, 221:1, 221:3, 221:19, 226:5, 275:14 202 2:8, 3:11, 3:21, 4:8, 4:16 2023 275:17 20520 4:15 20530 4:7 21 96:11, 96:15, 117:6 22 75:17, 117:6, 199:7, 203:1 2201 4:14 2205 4:8</p>	<p>23 131:9, 131:12, 132:7, 132:9, 132:15, 133:10, 133:22, 134:13, 135:4, 135:15, 135:20, 137:8, 138:9, 138:22, 139:13, 139:17, 140:1, 140:7, 140:11, 141:11, 142:5, 142:12, 143:4, 143:21, 144:10, 144:13 24 245:4 242902 1:20 246 6:13 25 57:15 26 187:14 27 6:15, 111:3, 246:14, 246:21 275 1:21 28 108:19 29 6:12, 138:12, 199:13, 204:5, 208:18</p>
<hr/> <p>2</p>			
<p>20 1:15, 4:6, 7:8, 51:5, 53:2, 117:10, 117:11, 117:12, 117:14, 126:6, 126:16, 126:17, 214:17, 215:5, 221:1, 221:14, 253:3, 256:7 2000 2:8 20005 2:7, 3:20 20024 3:10 2005 27:13 2009 21:20, 22:4, 26:9, 26:11, 27:16, 30:5, 30:11, 30:15, 31:12, 31:17, 33:14, 34:3, 42:20</p>			<hr/> <p style="text-align: center;">3</p> <hr/> <p>30 5:10, 7:3, 14:19, 32:6, 39:10, 66:4, 66:16, 70:1, 98:1, 201:4, 201:5, 213:14, 219:9, 220:14, 222:5, 266:17 305 3:21</p>

<p>31 16:19, 120:2, 120:9, 121:11, 121:20, 122:15, 138:21, 142:21, 143:16, 144:4, 154:22, 155:2, 157:15, 161:7, 162:11, 166:14, 179:18, 183:14, 184:7, 187:2, 189:3, 189:16</p> <p>34 173:7</p> <p>38 267:12, 267:16</p> <p>39 108:18, 109:9</p> <p>3rd 107:22, 115:7</p> <hr/> <p style="text-align: center;">4</p>	<p>166:5, 166:13, 167:3, 169:22, 170:4, 171:8, 171:12, 171:22, 172:11, 172:18</p> <hr/> <p style="text-align: center;">6</p> <hr/> <p>6 273:17</p> <p>63 109:14</p> <p>6371 4:16</p> <p>64 117:6</p> <p>646 3:11</p> <p>647 4:16</p> <p>65 117:6</p> <p>66 99:1, 99:16, 117:6</p> <p>67 117:7</p> <p>68 117:7</p> <p>684 99:1, 99:17</p> <p>69 117:7</p> <hr/> <p style="text-align: center;">7</p> <hr/> <p>70 117:7</p> <p>71 117:7</p> <p>7583 3:21</p> <p>76 115:8</p> <p>79 99:1, 99:17, 117:7</p> <hr/> <p style="text-align: center;">8</p> <hr/> <p>80 117:7</p>	<p>800 3:9</p> <p>81 111:11, 117:7</p> <p>82 111:11, 117:7</p> <p>83 111:11, 117:7</p> <p>84 111:11, 117:7</p> <p>85 117:8</p> <p>86 117:8</p> <p>8th 127:15, 127:18, 138:8, 143:21, 147:3</p> <hr/> <p style="text-align: center;">9</p> <hr/> <p>90 5:22, 6:3, 6:5, 6:7, 6:8, 6:9, 29:14, 29:15, 31:3</p> <p>91 113:19</p> <p>92 113:19</p> <p>93 113:19</p> <p>95 113:19</p> <p>96 113:20</p> <p>97 113:20</p> <p>98 113:20</p> <p>9th 169:16</p>	
<p>41 108:18, 109:10</p> <p>42 5:14, 5:18, 5:19, 5:20</p> <p>425 3:8</p> <p>49 204:6</p> <hr/> <p style="text-align: center;">5</p>			
<p>5 103:6</p> <p>514 2:8, 4:8</p> <p>5172 3:11</p> <p>53 112:12</p> <p>54 82:1, 112:12</p> <p>58 125:17</p> <p>5th 165:8, 165:17, 166:1, 166:2,</p>			