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# Transcript of Patrick Daniel Scholl

**Date:** October 29, 2019

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

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Transcript of Patrick Daniel Scholl  
Conducted on October 29, 2019

1 IN THE UNITED STATES DISTRICT COURT  
2 FOR THE DISTRICT OF COLUMBIA  
3 ----- x  
4 JUDICIAL WATCH, INC., :  
5 Plaintiff, :  
6 v. : Case No.  
7 U.S. DEPARTMENT OF STATE, : 14-cv-1242 (RCL)  
8 Defendant. :  
9 ----- X  
10  
11 Videotaped Deposition of PATRICK DANIEL SCHOLL  
12 Washington, DC  
13 Tuesday, October 29, 2019  
14 9:53 a.m.  
15  
16  
17  
18  
19  
20 Job No.: 262569  
21 Pages 1 - 207  
22 Reported by: Debra A. Whitehead

1 Videotaped Deposition of PATRICK DANIEL SCHOLL,  
2 held at the offices of:  
3  
4 PLANET DEPOS - DC  
5 1100 Connecticut Avenue, NW  
6 Suite 950  
7 Washington, DC 20036  
8 (888) 433-3767  
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  
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8 Washington, DC 20024  
9 (202) 646-5172  
10  
11 ON BEHALF OF DEFENDANT:  
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13 UNITED STATES DEPARTMENT OF JUSTICE  
14 FEDERAL PROGRAMS BRANCH  
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16 Washington, DC 20005  
17 (202) 305-7583  
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21  
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:  
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4 UNITED STATES DEPARTMENT OF STATE  
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6 Washington, DC 20520  
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8  
9  
10 ALSO PRESENT:  
11 JEREMY DINEEN, Video Specialist  
12  
13  
14  
15  
16  
17  
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9

1 familiar that it's relating to a FOIA request  
2 Judicial Watch submitted back in 2014 to the State  
3 Department for records from the Secretary's office  
4 pertaining to talking points that were provided to  
5 Ambassador Susan Rice prior to her appearance on  
6 Sunday to discuss the Benghazi attacks back in  
7 2012? Is that your understanding?  
8 **A That's what I understand now, yes.**  
9 Q Okay. What did you mean by, that's what  
10 you understand now?  
11 **A The --**  
12 Q Did you have a different understanding  
13 before?  
14 **A No. I mean, I didn't know about the --**  
15 **the lawsuit, I wasn't really aware of it until it**  
16 **came up as a -- a subject -- when I was visited by**  
17 **the attorneys to let me know that there's a**  
18 **possibility there was going to be a deposition.**  
19 **That was the first time I was aware of it.**  
20 Q Okay. And so the reason I wanted to give  
21 you the background is to kind of explain to you  
22 why you're here today.

10

1 Your name had come up in previous  
2 depositions in this case, where you -- you were  
3 named as having potential relevant information, so  
4 that is why we've asked you to come here today.  
5 Before we move on, have you ever been  
6 deposed before?  
7 **A No.**  
8 Q Okay. Let me just go over a few ground  
9 rules for the deposition.  
10 Obviously, as you know, you were just  
11 sworn in. And you're required to tell the truth.  
12 Is there any reason that you would not be able to  
13 answer the questions truthfully today?  
14 **A No.**  
15 Q Okay. There's a court reporter here who  
16 is transcribing everything that's being said. So  
17 to have a clean transcript, I would just ask that  
18 you let me finish asking the questions, and that I  
19 will let you finish answering the questions so we  
20 don't speak over each other.  
21 **A Yes.**  
22 Q Okay. You're doing very well by

11

1 providing verbal responses, because obviously  
2 heads of the nods do not transcribe.  
3 If you don't understand a question or if  
4 you need clarification, please let me know.  
5 That's important because if you don't, I will  
6 assume that you had understood the question that's  
7 being asked and that you answered it as it was --  
8 as it was asked.  
9 Is that fair?  
10 **A Yes.**  
11 Q Okay. Also, your -- the attorney here  
12 representing you, he may have objections for the  
13 record that he may raise. Make sure to let him  
14 finish his objection before answering the  
15 question.  
16 Unless he instructs you not to answer,  
17 you are still required to answer the question.  
18 Okay?  
19 **A I understand.**  
20 Q Okay. All right. So let's move on.  
21 Could I just get some background  
22 information from you as to your employment with

11

1 the State Department.  
2 When did you begin at the State  
3 Department?  
4 **A I started at the State Department in**  
5 **1984.**  
6 Q Okay. And I don't really want to go in  
7 too much detail that far back. But what did you  
8 start as in 1984?  
9 **A I started out as a passport examiner.**  
10 Q Okay. Was that here in Washington, DC?  
11 **A Yes.**  
12 Q Okay. And then how long were you a  
13 passport examiner?  
14 **A I don't recall totally. Probably three**  
15 **years.**  
16 Q Okay. And what office was that in?  
17 **A The Bureau of Consular Affairs.**  
18 Q Okay. And how long were you in the  
19 Bureau of Consular Affairs?  
20 **A I'm not sure, but probably around five**  
21 **years.**  
22 Q Five years or so? Okay.

13

1 And then in -- after that, around 1989 or  
2 so, where did you move?  
3 **A I think it was '88 that I moved to the**  
4 **FOIA office.**  
5 Q FOIA office.  
6 And what's the FOIA office, if you can be  
7 more specific?  
8 The State Department is so big.  
9 **A At the time?**  
10 Q Yes. Yes.  
11 **A Back then?**  
12 Q Yes. Back then.  
13 **A I can't remember what it was called back**  
14 **then. FPC, perhaps, was the acronym.**  
15 Q Was that --  
16 **A FOIA privacy classification review.**  
17 Q Was that within the A bureau?  
18 **A I don't recall.**  
19 Q Okay. And what were your duties in the  
20 FOIA office?  
21 **A As an analyst, processing information**  
22 **access requests.**

14

1 Q So what -- your day-to-day, what -- what  
2 does that entail? Or what did that entail at the  
3 time?  
4 **A Processing, sending out search taskers**  
5 **and processing responses. Administrative**  
6 **processing.**  
7 Q Okay.  
8 **A For the requests.**  
9 Q Did you -- as part of your duties did you  
10 have the responsibility to review records to  
11 determine if they're responsive or if information  
12 needed to be redacted from them?  
13 **A No.**  
14 MR. PEZZI: Objection. Form.  
15 Q Okay. What was your title back then?  
16 **A Paralegal specialist.**  
17 Q Okay. All right. And how long did you  
18 remain employed as a paralegal specialist in the  
19 FOIA office?  
20 **A As an analyst, for -- I -- I don't**  
21 **remember how many years it was. I was a paralegal**  
22 **specialist for a few years. I don't remember**

15

1 **exactly when the position changed into a different**  
2 **series.**  
3 Q Okay. What do you mean "the position  
4 changed into a different series"?  
5 **A They called it -- it switched to a**  
6 **program analyst position later on. I don't know**  
7 **when that happened.**  
8 Q Okay. But as a program analyst, did you  
9 still remain within the --  
10 **A Yes.**  
11 Q -- FOIA office?  
12 And did your duties and responsibilities  
13 remain basically the same?  
14 **A Yes.**  
15 Q Okay.  
16 Okay. And how long did you remain as a  
17 program analyst in the FOIA office?  
18 **A I don't remember how long.**  
19 Q Okay. Did you change your position since  
20 then?  
21 **A Yes.**  
22 Q Okay. And what was the next position you

16

1 held?  
2 **A I became a team leader.**  
3 Q Still in the FOIA office?  
4 **A Yes.**  
5 Q Okay. And how did your duties change at  
6 that point?  
7 **A I started to clear the work of others.**  
8 Q Okay. And the individuals that you were  
9 managing, were they basically doing the same tasks  
10 that you had done before as a program analyst?  
11 **A Yes.**  
12 Q Okay. Just let me back up.  
13 As a program analyst, in reviewing or  
14 administratively processing FOIA requests, did you  
15 process FOIA requests that were both in litigation  
16 and not in litigation? Or --  
17 **A I don't recall.**  
18 Q Okay. And then how long did your  
19 position change from being a team leader?  
20 **A I became a branch chief -- or a section**  
21 **chief at the time, it was called a section chief.**  
22 Q Section chief. And is that still within

17

1 the FOIA office?  
2 **A Yes.**  
3 Q Okay. And when did you become a section  
4 chief?  
5 **A I don't recall the date.**  
6 Q Do you have a time frame? Or whose  
7 administration it was?  
8 **A In the '90s.**  
9 Q '90s. Okay. Thank you.  
10 And as section chief, how had your  
11 responsibilities changed at that point?  
12 **A You mean the section chief, from an**  
13 **analyst to a section chief?**  
14 Q Yes. From a team leader to a section  
15 chief.  
16 **A Can you repeat the question, because I**  
17 **was an information -- I was a paralegal.**  
18 Q Yes.  
19 **A And as far as the management of the**  
20 **office, I was a team leader, and then a section**  
21 **chief. So then I was responsible for the team**  
22 **leaders at the time. The nomenclature changed all**

18

1 **the time because we were being reorganized**  
2 **constantly.**  
3 Q Okay. So there are multiple team  
4 leaders?  
5 **A Right.**  
6 Q Okay. All right. And that's still  
7 within the FOIA office. Correct?  
8 **A Yes.**  
9 Q Okay. And then after being a section  
10 chief, when did your -- did you move on to a  
11 different position?  
12 **A I became a branch chief.**  
13 Q Okay. And a branch chief of the FOIA  
14 office or --  
15 **A Branch chief of part of the FOIA office,**  
16 **yes.**  
17 Q Okay. And let me ask you, what's the  
18 difference between section chief and branch chief?  
19 **A I think they weren't allowed to call it a**  
20 **branch at the time, so they called it a section.**  
21 Q Okay.  
22 **A I think eventually -- it was part of**

19

1 **reorganization, I believe. So it -- it was a**  
2 **section chief for quite some time, until it was**  
3 **determined that it was -- they were authorized, I**  
4 **guess, to make it a -- a branch.**  
5 Q Okay. So just to briefly understand,  
6 then. Basically is it your testimony that your  
7 responsibilities and duties pretty much stayed the  
8 same when you were a branch chief from when you  
9 were section chief?  
10 **A Yes.**  
11 Q Okay. Who reported to the branch chief?  
12 **A I don't --**  
13 MR. PEZZI: Objection. Form.  
14 Q And I don't mean necessarily --  
15 **A I don't recall.**  
16 Q -- names.  
17 But if you can describe sort of the  
18 individuals or officials, and the type of  
19 positions who reported to the branch chiefs.  
20 MR. PEZZI: Objection. Form.  
21 **A They were -- they were team leaders.**  
22 Q Okay.

20

1 **A I believe. I don't recall. It's a long**  
2 **time ago.**  
3 Q Sure. And is this still in the '90s?  
4 **A Yes.**  
5 Q Okay. How many team leaders, do you  
6 remember?  
7 **A I don't remember.**  
8 Q Okay. Who did you report to at that  
9 point?  
10 **A At that time I reported to Ann Snuggs.**  
11 Q And what was her title?  
12 **A She was a chief.**  
13 Q So you as the branch chief reported to a  
14 chief?  
15 **A Right. I reported to her. I was a**  
16 **section chief --**  
17 Q Okay.  
18 **A -- myself.**  
19 **She was the branch chief when I think**  
20 **positions went up, her -- I'm not sure what they**  
21 **called her position.**  
22 Q Okay.

21  
1 A **But I reported to Ann.**  
2 Q Okay. And how long have you remained as  
3 a branch chief at the State Department?  
4 A **I don't recall exactly.**  
5 Q Or when was the next sort of position --  
6 A **Probably --**  
7 Q -- that you held?  
8 A **-- into the early '00s.**  
9 Q I'm sorry?  
10 A **So 2001 or '2, that I recall, yes.**  
11 Q Okay. And what did you --  
12 A **Or '3.**  
13 Q And between 2001, 2003, what was your  
14 position then?  
15 A **It was as a branch chief.**  
16 Q Okay. And after that?  
17 A **I still remained a branch chief, but I**  
18 **was detailed to projects, different projects.**  
19 Q How long were -- did that happen?  
20 A **How long? Excuse me?**  
21 Q Yeah. So you remained as branch chief in  
22 2003?

22  
1 A **Uh-huh.**  
2 Q But you were detailed for different  
3 projects.  
4 A **Right.**  
5 Q So I'm curious, are you still a branch  
6 chief?  
7 A **No, I'm not.**  
8 Q Okay. So I just want to know what your  
9 next position was --  
10 A **Okay.**  
11 Q -- at the State Department.  
12 A **Okay. The position I think remained the**  
13 **same. I was detailed to a project to reduce the**  
14 **backlog.**  
15 Q Okay.  
16 A **For a period of, if I can recall, about**  
17 **two years. So about 2005.**  
18 Q Okay. And then in 2005 --  
19 A **2005 --**  
20 Q -- what was your position?  
21 A **I'm not sure exactly of the timing of all**  
22 **this, but --**

23  
1 Q I understand.  
2 A **-- I think in 2005 I was put in as the**  
3 **branch chief for systematic review.**  
4 Q Still within the FOIA office?  
5 A **Within the overall FOIA office, yes.**  
6 Q Okay. What is the systematic review?  
7 A **It deals with declassification, automatic**  
8 **declassification, 25-year declass of records.**  
9 Q And how long did you remain in that  
10 position?  
11 A **I don't -- probably -- probably two**  
12 **years. I don't remember -- recall exactly.**  
13 Q Okay.  
14 A **A year or two. I'm not sure.**  
15 Q Okay. And then what was your position  
16 after that?  
17 A **After that, I became the division chief**  
18 **for requester liaison.**  
19 Q What is a division chief for requestor  
20 liaison?  
21 A **They deal with the intake of the new**  
22 **requests, and they also have staff, basically a**

24  
1 **call center for requestors' questions.**  
2 Q Okay. And this is requestor liaison for  
3 FOIA requests. Right?  
4 A **Correct. Correct.**  
5 Q All right. And then how long did you  
6 remain as a division chief?  
7 A **I remained the division chief there**  
8 **until -- I don't remember the years. 2011, 2010.**  
9 **I believe, I'm not sure.**  
10 Q Okay. So I want to back up to 2009, when  
11 Secretary Clinton began her tenure.  
12 Do I have it right then at that time you  
13 were the branch chief for systematic review?  
14 A **When?**  
15 Q In two thousand -- January of 2009, when  
16 Secretary Clinton began her tenure at the State  
17 Department. Is it right that you were the branch  
18 chief for systematic review?  
19 A **I believe so.**  
20 Q Okay. And then how long -- okay. So you  
21 were a division chief for requestor liaison from  
22 2010, 2011, you believe?

25

1 A I believe it was about a year, yes, I  
2 was.  
3 Q Okay.  
4 A I'm not sure.  
5 Q And then who did you report to as  
6 division -- as the division chief?  
7 A Margaret Grafeld.  
8 Q Was she your direct supervisor?  
9 A I believe at the time.  
10 Q Okay.  
11 A There might have also been a deputy  
12 director, but I reported to Ms. Grafeld.  
13 Q Ms. Grafeld. Okay.  
14 How about as branch chief systematic  
15 reviewer?  
16 A Uh-huh.  
17 Q Who did you report to?  
18 A Two thousand -- as a branch chief -- I  
19 don't remember who the division chief was back  
20 then.  
21 Q What was the division called?  
22 A Systematic review.

26

1 Q Okay.  
2 A I -- my portion of this was electronic  
3 review, so I was a -- let me back up and say I  
4 was -- I was the branch chief of the electronic  
5 review of systematic review. And I don't remember  
6 who the division chief for systematic review was.  
7 Q Okay. Prior to 2010, did you report to  
8 Ms. Grafeld in any of your other previous  
9 positions?  
10 A So that would be prior to -- no, I  
11 didn't. Not until I became a division chief did I  
12 report to Ms. Grafeld.  
13 Q Okay. And then in 2011, what was the  
14 position that you moved into?  
15 A It was the division chief for statutory  
16 compliance and research.  
17 Q And what is that division?  
18 A That division is responsible for the  
19 administrative processing of requests, information  
20 access requests, including FOIA.  
21 Q So what was your -- so, I'm sorry, what  
22 was your title?

27

1 A Division chief.  
2 Q You were the chief of the division.  
3 Okay.  
4 So what was your -- what were your duties  
5 and responsibilities?  
6 A I was the supervisor of three branch  
7 chiefs, whose branches were responsible for  
8 processing information access requests.  
9 Q And who were the branch chiefs that  
10 reported to you in 2011?  
11 A I'm not sure, but I believe at the time  
12 Jeff Hermesman, Terry --  
13 Q I'm sorry. Go ahead.  
14 A Terry Gordon. And I believe Melody  
15 Adams.  
16 Q Can you spell Jeff's last name?  
17 A H-E-R-M-E-S-M-A-N.  
18 Q You mentioned that the requests included  
19 FOIA. Were there other types of requests that  
20 were --  
21 A It would -- it would --  
22 Q -- that your division was responsible

28

1 for?  
2 A The statutory compliance would process  
3 mandatory requests. Basically, 25 year in  
4 requests from researchers under the executive  
5 order.  
6 Q By the 25 years, you mean the  
7 declassification?  
8 A Yes.  
9 Q Okay. And as the division chief in 2011,  
10 who did you report to?  
11 A Margaret Grafeld.  
12 Q Okay.  
13 A And there might have been a deputy  
14 director at the time it was formed. I'm not sure  
15 if it existed at the time. I don't recall.  
16 Q Okay. And how long did you remain in  
17 that position?  
18 A In that position as a division chief?  
19 Q Yes.  
20 A Until -- until October of 2017.  
21 Q Okay. And what is your position now?  
22 A Technically I'm still in the position,



29

1 **but I was detailed in 2017.**  
2 Q What was your detail?  
3 **A I was detailed to assist the office**  
4 **director with the project to reduce the backlog.**  
5 Q Okay. Who was the office director?  
6 **A In '17? Eric Stein.**  
7 Q Are you still working for Eric Stein now?  
8 **A Yes.**  
9 Q Okay. And you report to him directly?  
10 **A Yes.**  
11 Q Okay. Did you, back in 2000 -- and I  
12 want to focus on the time frame of during  
13 Secretary Clinton's tenure.  
14 Did you work with Eric Stein in various  
15 positions you had?  
16 **A I don't believe so.**  
17 Q Okay. How about in 2014?  
18 **A No, I don't -- I don't really remember.**  
19 Q Okay.  
20 Okay. And did I ask you, in 2011 when  
21 you were the division chief -- no, I'm sorry. In  
22 2010 to 2011, when you were the division chief for

30

1 requestor liaison, did you have individuals you  
2 were managing at that point?  
3 **A Yes.**  
4 Q And who were they?  
5 **A Mary Casto and Audrey Holton.**  
6 Q Okay.  
7 **A And there was a chain. So it might have**  
8 **been Wilma Manning as well.**  
9 Q Okay.  
10 (Scholl Deposition Exhibit 1 marked for  
11 identification and is attached to the transcript.)  
12 Q Mr. Scholl, I show you what's already  
13 been marked as Exhibit 1.  
14 **A Uh-huh.**  
15 Q And this is an organization chart of IPS  
16 from 2013.  
17 Do you see your office listed in here in  
18 this chart?  
19 MR. PEZZI: Objection. Form.  
20 **A It indicates on this that, yes, Statutory**  
21 **Compliance and Research Division.**  
22 Q Okay.

31

1 **A Yes.**  
2 Q And that's when you were the division  
3 chief.  
4 **A I believe so, yes.**  
5 Q Okay. Did you report at all -- well, was  
6 Sheryl Walter the director of IPS at the time?  
7 **A I believe so, as indicated in this org**  
8 **chart.**  
9 Q Okay. Did you report to Ms. Walter at  
10 all?  
11 **A Yes.**  
12 Q So did you report to Ms. Walter as well  
13 as Ms. Grafeld?  
14 **A No.**  
15 Q Who did you report to, I guess?  
16 **A I report to Ms. Walter, Mr. -- primarily**  
17 **reported to Mr. Hackett.**  
18 Q Okay. When did you begin working with  
19 Mr. Hackett?  
20 **A I don't remember.**  
21 Q Okay. You can put that aside. Thank  
22 you.

32

1 Actually, can -- do you mind if you do me  
2 a favor and just mark the box that -- and I can  
3 give you my pen, or your counsel.  
4 **A Mark the box?**  
5 Q The box that indicates where your office  
6 was at the time. Within -- or circle it.  
7 **A Is that good?**  
8 Q Yes. Thank you.  
9 Now, I want to focus on 2009 when  
10 Secretary Clinton began her tenure at the State  
11 Department.  
12 Did you have any involvement in any way  
13 with respect to her transition team coming to the  
14 State Department?  
15 **A No, not that I recall.**  
16 Q Okay. Oh, I'm sorry. Going back to  
17 Exhibit 1?  
18 **A Uh-huh.**  
19 Q I see there's an office that's titled  
20 FOIA Program Manager?  
21 **A At the bottom here?**  
22 Q Yes.

33

1 What is that?

2 **A That person was the person responsible**

3 **for establishing the -- from my understanding,**

4 **because that wasn't my division. But my**

5 **understanding was this person was responsible for**

6 **putting out the regs and guidance as regards to**

7 **processing, the administrative processing, and the**

8 **review. Partially responsible.**

9 Q Do you know who that person was?

10 **A In '13? I don't really recall. Marianne**

11 **Manheim might have been the person that was there,**

12 **but I don't recall these dates.**

13 Q Okay.

14 Okay. Now, I want to focus on one of the

15 issues that Judge Lamberth had permitted discovery

16 in this case, which deals with Secretary Clinton's

17 e-mail use --

18 **A Uh-huh.**

19 Q -- while she was at the State Department.

20 Let me just ask you, when did you first

21 learn of Secretary Clinton's e-mail?

22 MR. PEZZI: Objection. Form.

34

1 **A I don't recall when.**

2 Q Was it while she was still at the State

3 Department?

4 MR. PEZZI: Same objection.

5 **A It could have been. I don't -- I don't**

6 **recall.**

7 Q Okay. Can you tell me what you knew

8 about her e-mail?

9 **A What I read on the news.**

10 Q What did you read on the news? I'm

11 trying to get a time frame of --

12 **A That, I guess, from what I recall -- I**

13 **don't recall clearly. That there was an issue**

14 **with her use of a device, a mobile device.**

15 Q Is that -- was that a photograph --

16 **A Yes.**

17 Q -- of her holding a black -- or what

18 looked to be like a BlackBerry device?

19 **A Yes, I believe it was.**

20 Q Okay. And tell me, how did you learn of

21 that?

22 **A How did I learn of it?**

35

1 Q Yeah.

2 **A The picture?**

3 Q Yeah.

4 **A That I saw on media.**

5 Q Okay. And what did you do as a -- did

6 you discuss that picture with anybody --

7 **A No.**

8 Q -- at the State Department?

9 Did you have any discussions with

10 Mr. Hackett about the photograph or her e-mail use

11 at that point?

12 **A Not that I recall.**

13 MR. PEZZI: Objection. Form.

14 **A Not that I recall.**

15 Q Okay. Do you recall in 2013 when that

16 photograph was published Mr. Hackett inquiring

17 within IPS what the State Department knew about

18 the BlackBerry that was shown in the photograph or

19 about her e-mail use?

20 MR. PEZZI: Objection. Form.

21 Foundation.

22 **A I don't recall anything about it.**

36

1 Q So you just saw the photograph, and

2 did -- that was it?

3 **A Yes.**

4 Q What did you think when you saw the

5 photograph?

6 **A I really didn't have any opinion either**

7 **way.**

8 Q Well, why does -- why does it stand in

9 your mind, I guess, at this point, so many years

10 later, that you saw this photograph in the

11 newspaper of her holding a BlackBerry?

12 MR. PEZZI: Objection. Form.

13 **A It seems -- seems to be a rather iconic**

14 **photograph that I've seen lots of times. But to**

15 **me it really had no import.**

16 Q Okay. I want to focus your attention on

17 a FOIA request that was submitted to the State

18 Department in December of 2012. And the requester

19 is CREW, that's the acronym. The name is Citizens

20 For Responsibility and Ethics in Washington.

21 Are you familiar with the organization?

22 **A I've heard the name, yes.**

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1 Q Okay. Are you familiar with the request  
2 that CREW had sent to the State Department in  
3 December of 2012?  
4 A No.  
5 MR. PEZZI: Objection. Form.  
6 Q Okay. CREW had sent a -- well, CREW had  
7 sent a FOIA request to the State Department, I  
8 believe on December 6 of 2012, asking for records  
9 pertaining to Secretary -- any e-mail accounts  
10 that Secretary Clinton may have used while at the  
11 State Department.  
12 Are you familiar at all with that  
13 request?  
14 MR. PEZZI: Same objections.  
15 A I don't recall. I'm not familiar with  
16 it, no.  
17 Q Okay. Do you remembering -- do you  
18 remember handling that FOIA request?  
19 A No, I don't recall handling that request.  
20 Q Have you discussed any requests from --  
21 that you received from -- or that the State  
22 Department received from CREW back in 2012 with

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1 anybody within IPS in the last several years,  
2 since 2014?  
3 MR. PEZZI: Objection. Form.  
4 A Do I recall any request coming --  
5 Q No.  
6 A -- from CREW?  
7 Q Any discussions that you had from anybody  
8 with IPS for a request that came from CREW back in  
9 2012.  
10 A No.  
11 Q Let's focus then on the processing of  
12 FOIAs back in 2012, when that request --  
13 A Sure.  
14 Q -- was sent to the State Department.  
15 So based on my notes, I believe you were  
16 the division chief for statutory compliance.  
17 Right?  
18 A Yes.  
19 Q At that time?  
20 Okay. So would your office have been  
21 responsible for any of the FOIA requests that came  
22 in at the State Department?

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1 A From -- any requests?  
2 Q Any -- FOIA requests specifically.  
3 A Yes.  
4 Q Okay. And what was the process for how  
5 they were -- the process for handling FOIA  
6 requests that came in at the time?  
7 A In our area, we would receive it from the  
8 other division. They would take the request.  
9 Q And which division would intake --  
10 A It would come from the requestor liaison  
11 division.  
12 Q Okay. So the request when it initially  
13 comes in goes into the requestor liaison division.  
14 And then they send it -- send it up to your  
15 division?  
16 A Yes.  
17 Q Okay. And what did they -- why did they  
18 send it up to your division?  
19 A Well, at the request of their own scope  
20 and deal with the administrative issues. And then  
21 when it's determined to be a valid request, they  
22 send it to our division for processing.

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1 Q Okay. And then what did your division do  
2 with the request?  
3 A Generally?  
4 Q Yes.  
5 A We would determine which offices to  
6 search, and send taskers to these offices.  
7 Q Okay. And how would you send the  
8 taskers?  
9 A I don't remember back in '13. But  
10 generally we would send a form tasker, which would  
11 ask them to provide information about their  
12 search, how much time they spent, and provide us  
13 with details. And -- and to return the documents  
14 to us, if there were any documents, with the form.  
15 Q Okay. And would you do that yourself, or  
16 did you -- would you have somebody else do that  
17 within your division?  
18 A Myself as -- no.  
19 Q As the division chief.  
20 A No, I wouldn't do that.  
21 Q Who would?  
22 A Generally it would be done by an analyst

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1 **working for one of my three branch chiefs.**  
2 Q Okay. And those were the three that you  
3 named earlier. Right?  
4 **A Right.**  
5 Q Okay. And then how would the responses  
6 with the search results come back to -- to your  
7 office?  
8 **A How?**  
9 Q Once the searches were complete.  
10 **A How would they be sent?**  
11 Q Yes.  
12 **A Physically, usually would be sent as a**  
13 **package back to our office.**  
14 Q Okay. Is -- never mind.  
15 During that time --  
16 **A What time was that?**  
17 Q Two thousand -- late 2012, early 2013,  
18 what we're -- we're focusing on around the time of  
19 this FOIA request --  
20 **A Okay.**  
21 Q -- from CREW.  
22 Did your division or Ms. Walter or John

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1 Hackett, did -- were there any regular meetings  
2 that were held to discuss the FOIA requests?  
3 MR. PEZZI: Objection. Form.  
4 **A There were meetings. I'm not sure who**  
5 **was in attendance. But there -- from what I**  
6 **recall, there were meetings to discuss requests,**  
7 **but I don't remember which requests or who was**  
8 **there exactly.**  
9 Q Sure. And that's understandable.  
10 How often were the meetings held?  
11 MR. PEZZI: Objection. Form.  
12 **A I don't recall.**  
13 Q Were they weekly?  
14 **A They could have been, but I don't recall.**  
15 Q Okay. Do you know what a significant  
16 FOIA report is? Does that ring a bell?  
17 **A Yes, it does.**  
18 Q Okay. Can you explain to me what that  
19 is?  
20 **A I believe those are requests from --**  
21 **those are requests for listing of requests that**  
22 **are of significant importance to the department,**

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1 **bureaus, and offices, such as that, things like**  
2 **that.**  
3 Q I'm sorry, I can't hear the last part.  
4 **A Bureaus and offices.**  
5 Q Okay. And how -- who determined what  
6 requests go on the significant FOIA report?  
7 **A That generally would have come from the**  
8 **requestor liaison division, intake.**  
9 Q The intake. And who was the intake  
10 again? Who was the division of that division --  
11 **A At that time?**  
12 Q Yes.  
13 **A I don't recall. It could have been**  
14 **Rosemary Reid.**  
15 Q Rosemary Reid. Okay.  
16 **A But I'm not -- I'm not really sure.**  
17 Q And are the significant FOIA reports  
18 something that would have been discussed during  
19 the meetings?  
20 MR. PEZZI: Objection. Foundation.  
21 **A It's possible.**  
22 Q Okay.

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1 **A But I don't know.**  
2 Q And how about during these meetings;  
3 would the leadership of IPS, meaning Ms. Walter at  
4 the time or her deputy, John Hackett, would they  
5 attend the meetings?  
6 MR. PEZZI: Objection. Form.  
7 Foundation.  
8 **A I would think so, yes.**  
9 Q Okay. And how about Ms. Grafeld?  
10 MR. PEZZI: Same objections.  
11 **A I don't recall. I don't recall her**  
12 **attending the meetings, but I don't remember.**  
13 Q I don't believe I've asked you this, but  
14 what was Ms. Grafeld's position during this time?  
15 **A She might -- I don't recall the timing.**  
16 **But she became the deputy assistant secretary. So**  
17 **I believe during this period she was DAS.**  
18 Q She was deputy assistant secretary for  
19 what?  
20 **A I don't remember. Deputy assistant**  
21 **secretary for -- I don't remember what it was**  
22 **called back then. But I think now it's called**

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**1 global publishing -- I don't remember what it**  
**2 stood for.**  
3 Q Well, let me just point you to Exhibit 1.  
4 **A Uh-huh.**  
5 Q Is it -- would it have been GIS?  
6 **A It would be GIS.**  
7 Q Okay. Who -- and GIS oversaw IPS?  
8 **A Yes.**  
9 Q Okay. And Mr. Hackett and Sheryl Walter  
10 were the leadership of IPS at the time?  
11 **A Yes.**  
12 Q Okay. When you were the division chief  
13 of the requestor liaison, I believe you said  
14 somewhere -- somewhere around 2010, 2011, did you  
15 generate significant FOIA reports?  
16 **A I may have. We may have, yes.**  
17 Q Okay. And how did you go about  
18 generating those, or determining what FOIA  
19 requests --  
20 **A I think there were --**  
21 Q -- to include on the reports?  
22 MR. PEZZI: Just give her a chance to

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1 finish, if you can.  
2 THE WITNESS: I'm sorry.  
3 MR. PEZZI: That's okay.  
4 **A Go ahead, I'm sorry.**  
5 MS. COTCA: Can you read it.  
6 (Pending question read.)  
7 Q Okay. Let me ask it again, since it's  
8 interrupted.  
9 When you were the division chief of  
10 requestor liaison division, how did you go about  
11 determining what FOIA requests to include in the  
12 significant FOIA reports?  
13 **A I don't recall. That was generated by**  
**14 one of my branch chiefs, the branch chief who was**  
**15 responsible for -- for intake.**  
16 Q But is -- did you -- would you have  
17 reviewed what they would have provided to be  
18 included in the significant FOIA report as the  
19 division chief?  
20 **A Not that I recall.**  
21 Q So was it your practice then for you to  
22 have your branch chief, whomever reported to you,

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1 create the significant -- significant FOIA report,  
2 and you did not review it?  
3 MR. PEZZI: Objection. Form.  
4 **A Yes.**  
5 Q And then that would be sent over to -- to  
6 whom?  
7 **A I believe it was sent to the office**  
**8 director, but I don't recall exactly.**  
9 Q The office director of what?  
10 **A Of IPS.**  
11 Q Oh, okay. Sheryl Walter in 2013?  
12 **A Yes.**  
13 Q Okay.  
14 **A Yes.**  
15 Q Why was the significant FOIA reports, why  
16 were they created?  
17 **A I believe they were created because**  
**18 bureaus needed to be aware of the requests that**  
**19 were coming in, so they prepared to -- to collect**  
**20 documents and to respond.**  
21 Q Okay. But you were -- not all requests  
22 that the State Department received or all the

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1 bureaus received went onto the significant FOIA --  
2 **A No.**  
3 Q -- report?  
4 **A I don't believe so.**  
5 Q Are you familiar with Tasha Thian?  
6 **A Yes.**  
7 Q Okay. And who is Tasha Thian?  
8 **A She was the division chief of requestor**  
**9 liaison, I believe.**  
10 Q I'm sorry, what?  
11 **A She was the division chief for requestor**  
**12 liaison.**  
13 Q Did she attend the meetings that were  
14 held within IPS?  
15 MR. PEZZI: Objection. Form.  
16 Foundation.  
17 **A I don't recall.**  
18 Q Do you recall the White House having an  
19 interest in following the request that was  
20 submitted by CREW?  
21 MR. PEZZI: Objection. Form.  
22 Foundation.

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1 **A I don't recall, no.**  
2 Q Do you recall any discussions about or  
3 any communications about White House calling the  
4 State Department to inquire about this -- about  
5 the CREW request?  
6 **A I don't recall, no.**  
7 Q Okay. Do you recall any time that the  
8 White House had called about any other FOIA  
9 request?  
10 **A I don't recall.**  
11 Q Have you had any -- and this is during  
12 Secretary Clinton's tenure at the State  
13 Department, so 2009 to end of January 2013.  
14 Do you recall Cheryl Mills following any  
15 FOIA request that was submitted to the State  
16 Department that wasn't necessarily sent to the  
17 Secretary's office?  
18 MR. PEZZI: Objection. Form.  
19 Foundation.  
20 **A I don't.**  
21 Q You know who Cheryl Mills is?  
22 **A Yes, I do.**

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1 Q Okay. Chief of Staff for Secretary  
2 Clinton. Correct?  
3 **A Uh-huh.**  
4 Q Okay. How about Brock Johnson; do you  
5 know who Brock Johnson is?  
6 **A No, I don't know who he is.**  
7 Q Okay. Do you know that Brock Johnson  
8 worked for Ms. Mills?  
9 **A Did I know that?**  
10 Q Uh-huh.  
11 **A No.**  
12 Q Okay.  
13 **A I don't recall.**  
14 Q Okay. Did you ever interact with  
15 Mr. Johnson in regards to any FOIA requests  
16 pertaining to Secretary Clinton's e-mails?  
17 **A No.**  
18 Q How about Heather Samuelson; do you know  
19 who she is?  
20 **A Don't know who she is.**  
21 Q Okay. Do you recall interacting with  
22 Ms. Samuelson at any point during Secretary

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1 Clinton's tenure about FOIA requests pertaining to  
2 Secretary Clinton's e-mails?  
3 MR. PEZZI: Objection. Form.  
4 **A Not that I recall.**  
5 Q Okay. In processing FOIA requests, does  
6 the term to treat the request as a complex case,  
7 does that sound familiar?  
8 **A Yes.**  
9 Q Okay. And what does that mean?  
10 **A Its definition -- definition changed**  
11 **several times. But I believe that a complex**  
12 **request generally meant a request that required**  
13 **going outside of our central file searches, so**  
14 **that required going to bureaus or posts.**  
15 **The definition's changed.**  
16 Q So if a request were to ask for records  
17 from the Secretary's office or pertaining to  
18 Secretary Clinton's e-mails, would that have been  
19 deemed complex?  
20 MR. PEZZI: Objection. Form.  
21 Foundation.  
22 **A I don't know.**

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1 Q Okay. Let me ask it this way: If a --  
2 if a FOIA request asked for records from the  
3 Secretary's office, who was still -- the same  
4 Secretary who's still in office --  
5 **A Uh-huh.**  
6 Q -- would that request be deemed complex  
7 because it's being tasked to the Secretary's  
8 office?  
9 MR. PEZZI: Same objections.  
10 **A Yes, I believe it would. But that**  
11 **determination is made in the intake division,**  
12 **requestor liaison.**  
13 Q And are complex cases treated differently  
14 from other FOIA requests?  
15 MR. PEZZI: Same objections.  
16 Q And I'm sorry, I want to ask time frame  
17 of -- still focusing on the same time frame.  
18 **A 2013.**  
19 Q Yes.  
20 **A Sure. They would be processed along with**  
21 **all the other requests.**  
22 **What specifically do you mean? I'm not**

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1 **sure I understand.**  
2 Q Well, how would they -- I understand that  
3 they're termed as complex cases.  
4 A **Uh-huh.**  
5 Q What's the difference in how you would  
6 process a complex cases, as opposed to an ordinary  
7 FOIA request?  
8 A **I believe that became a management issue**  
9 **with the branches. Then they would determine how**  
10 **to allocate the request based on, you have this**  
11 **number of complex requests, and you have this**  
12 **number of simple or -- simple requests. So that**  
13 **was left up to the branch chiefs to determine how**  
14 **to distribute the work as managing the staff, as**  
15 **far as managing the staff is concerned.**  
16 Q Did -- did your division have any input  
17 into that?  
18 A **It was within our -- our division. So it**  
19 **would be the branch chief that would -- you're**  
20 **talking about --**  
21 Q Your branch chief. So you're -- when  
22 you're saying branch chief, that's the person

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1 under you --  
2 A **Correct.**  
3 Q -- as a division chief?  
4 Okay. Sorry about that.  
5 And when your branch chief determined  
6 that a case would be treated as a complex case, is  
7 that something that you would review --  
8 MR. PEZZI: Objection. Form.  
9 Q -- or approve?  
10 A **That wasn't determined by my branch**  
11 **chief; that was determined by the requestor**  
12 **liaison division who intook -- intake the case.**  
13 Q Thank you for the clarification.  
14 Do you know who Edgar -- and I'm not sure  
15 if I'm spell -- if I'm pronouncing his last name  
16 correctly, but Jaramillo? Does that --  
17 A **Yes.**  
18 Q -- ring a bell?  
19 Did I pronounce his last name correctly?  
20 A **Perfectly.**  
21 Q Okay. Great. Who is he?  
22 A **He is an employee in one of the branches,**

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1 **in statutory compliance.**  
2 Q What branch?  
3 A **The -- the NEA branch, the Near East**  
4 **Asia, South Asia, Near East South Asia.**  
5 Q How many branches are within the  
6 statutory compliance division?  
7 A **At the time?**  
8 Q Yes.  
9 A **There were three.**  
10 Q Okay. And it was NEA, and what were the  
11 other two?  
12 A **Well, it was EAN, which included NEA and**  
13 **Africa. There was WEP, which is western**  
14 **hemisphere primarily. And there was management**  
15 **and public diplomacy, which is MPD.**  
16 Q And what is MPD?  
17 A **They would handle most of the privacies,**  
18 **the privacy type requests and --**  
19 Q Meaning dealing with Privacy Act?  
20 A **Yeah, primarily. But also with FOIA.**  
21 Q Okay.  
22 Okay. Was -- okay. Never mind.

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1 Did you, as the division chief, did you  
2 have -- and again same time frame -- any  
3 responsibility or was it your practice to partake  
4 in processing any of the FOIA requests?  
5 A **No.**  
6 MR. PEZZI: Objection. Form.  
7 A **No.**  
8 Q Why is that?  
9 A **It's not -- it's not something that I**  
10 **did. It was the branch chiefs that process, the**  
11 **analysts on the branch chief staff.**  
12 **It's possible I got involved with some,**  
13 **I'm sure I did, but I don't recall specifically**  
14 **anymore.**  
15 Q Okay. Would it be an anomaly for you to  
16 get involved in a FOIA request?  
17 MR. PEZZI: Objection. Form.  
18 A **Involved?**  
19 Q In help -- in processing a FOIA request.  
20 A **In processing? It's possible.**  
21 Q Okay. So what was your -- what was your  
22 role then as the division chief?

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1 A As a division chief?  
2 Q Yes.  
3 A Providing oversight over the three  
4 branches that processed the requests.  
5 Q And what does that mean?  
6 A That means managing them.  
7 Q Can you be more specific?  
8 A Evaluations, time and attendance.  
9 Q Did you assist in day-to-day processing  
10 of any of the requests?  
11 A Not that I recall, no.  
12 Q So when FOIA requests were sent over from  
13 the intake --  
14 A Yes.  
15 Q -- they would be sent to your division.  
16 Correct?  
17 A They would sent -- be sent to the  
18 individual branches, yes.  
19 Q Oh, directly to the individual branches?  
20 A Yes.  
21 Q Okay. Why would it be -- why would they  
22 bypass you?

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1 A That's just the way the system was set  
2 up, because the volume was so large.  
3 Q Okay. And would they be sent, depending  
4 on -- because of the subject matter of the  
5 request?  
6 A Yes.  
7 Q Okay. And Edgar Jaramillo, he was in  
8 which branch?  
9 A The EAN branch.  
10 Q And that had dealt -- that was dealing --  
11 that dealt with FOIA requests pertaining to?  
12 A Near East, South Asia, Africa.  
13 Q Okay. Do you know why a request that  
14 pertained to Secretary Clinton's e-mails would be  
15 assigned to Mr. Jaramillo --  
16 A The --  
17 Q -- and the NEA division, rather than the  
18 WPD -- or, no, MPD division?  
19 MR. PEZZI: Objection. Form.  
20 Foundation.  
21 A They had -- each of the branches were set  
22 up to reflect the organization of the department

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1 at the time they were set up. And that would  
2 include also functional bureaus.  
3 So the acronyms came from the geographic  
4 to identify them. But their responsibilities were  
5 more than just the -- more than just the  
6 geographic responsibilities.  
7 So I believe something concerning the  
8 Secretary possibly would have come through that --  
9 through that bureau.  
10 Q Why?  
11 A Because I believe, though I'm not sure,  
12 that the Secretary's -- S was, I think, under the  
13 EAN branch.  
14 Q Thank you.  
15 As part of your duties as the division  
16 chief, did you partake in tasking any bureaus to  
17 search in response to any FOIA requests?  
18 A Not that I recall.  
19 Q Okay. Would that be something unusual,  
20 if you did -- if you had done that?  
21 MR. PEZZI: Objection. Form.  
22 A Yes.

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1 Q Okay. Who -- do you know Yvette Jacks?  
2 A No.  
3 Q How about, are you familiar with the  
4 office of S/ES-IRM?  
5 A No.  
6 Q Are you familiar with the office,  
7 S/ES-CR?  
8 A I believe so.  
9 Q What was that office?  
10 A I believe that's the Secretary's -- the  
11 Secretary's office for records.  
12 Q Right. Are you familiar with Clarence  
13 Finney?  
14 A Yes.  
15 Q Okay. And do you know that Mr. Finney  
16 was the -- or deputy director of S/ES-CR?  
17 A I wasn't sure what his title was.  
18 Q Okay. Did you interact with  
19 Mr. Finney -- with Mr. Finney?  
20 A I believe I did.  
21 Q Okay. For what purpose, or what context  
22 would you interact with Mr. Finney?



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1 **A I think he would contact us concerning**  
2 **requests, perhaps. But that was pretty much it.**  
3 Q Did you ever contact Mr. Finney's office  
4 in regards to requests?  
5 **A I'm not sure. I don't remember.**  
6 Q Okay. Are you familiar with John Bentel?  
7 **A John? Excuse me?**  
8 Q John Bentel?  
9 **A No.**  
10 Q Okay. Bear with me one moment.  
11 Who's Karen Finnegan?  
12 **A Karen Finnegan was the division chief for**  
13 **policy and plans within IPS.**  
14 Q Can you look, if you don't mind, at  
15 Exhibit 1, and let me know if you see her?  
16 **A Her division?**  
17 Q Her division, yes.  
18 **A Yes.**  
19 Q Okay. Is that the Programs and Policies  
20 Division?  
21 **A Yes.**  
22 Q Okay. She was the division chief.

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1 **A I believe she was, yes.**  
2 Q Okay.  
3 **A I'm not sure if at the time she was. I**  
4 **believe she was, but I don't really recall. She**  
5 **was eventually.**  
6 Q Okay. Fair enough.  
7 What was her -- her role or -- as far as  
8 you understood them, and duties and  
9 responsibilities?  
10 **A Well, I'm not sure about her duties and**  
11 **responsibilities. But -- I have to recall.**  
12 **Again, a lot of this I don't remember.**  
13 **But programs and policies was responsible**  
14 **for providing us guidance as far as administrative**  
15 **processing and review for the reviewers.**  
16 Q And what does that mean, "guidance as far  
17 as administrative processing"?  
18 **A Well, administrative processing as far as**  
19 **how to process. They're also responsible for**  
20 **providing guidance with regard to the application**  
21 **of exemptions to the reviewers.**  
22 Q Okay. And do -- is Ms. Finnegan still at

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1 the State Department?  
2 **A No, she is not.**  
3 Q When did she leave, if you know?  
4 **A I don't recall.**  
5 Q Are you familiar with the term "Oglesby  
6 letter"?  
7 **A Yes.**  
8 Q Okay. Can you explain to me what that  
9 means?  
10 **A It's -- I think it was a Army Oglesby**  
11 **court decision, that's what we termed it, but I**  
12 **think most agencies call it a no-record response.**  
13 Q A what?  
14 **A A no-record response.**  
15 Q And that's -- so is that a letter that  
16 the State Department would generate after the  
17 searches were complete and there were no records  
18 that were located in response to a particular FOIA  
19 request?  
20 **A Yes.**  
21 MR. PEZZI: Objection. Form.  
22 Q Is that -- when -- when would that

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1 typically be drafted, or prepared?  
2 MR. PEZZI: Objection. Form.  
3 Foundation.  
4 Q In -- and let me be more specific. In  
5 relation to a particular FOIA request, where in  
6 the process of administrating or handling that  
7 request from the time that the State Department  
8 received it, to the time that the letter was  
9 actually issued, where in that process would the  
10 letter be prepared?  
11 **A At the very end when the searches were**  
12 **completed.**  
13 Q Would it ever be drafted or prepared  
14 prior to a search being completed?  
15 MR. PEZZI: Objection. Foundation.  
16 **A I don't believe so.**  
17 Q Why?  
18 **A It would normally not be completed until**  
19 **the search was completed.**  
20 Q Because you needed to know what the  
21 search results were before --  
22 **A Correct.**

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1 Q -- preparing it.  
2 Is that correct?  
3 **A Yes.**  
4 Q Okay. And which branch or division  
5 prepared the -- the letter?  
6 **A All three branches were responsible for**  
7 **creating the Oglesby letters.**  
8 Q And that's all three branches within your  
9 division?  
10 **A Correct.**  
11 Q Okay. So was it strictly your division  
12 that was responsible for preparing the Oglesby  
13 letters?  
14 **A I believe so.**  
15 Q Or -- okay.  
16 **A Yeah.**  
17 Q Was that something that you would review  
18 as the division chief?  
19 **A No, I don't believe.**  
20 Q Would there be any oversight for your  
21 branch chiefs prior to them responding to a  
22 requestor?

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1 MR. PEZZI: Objection. Form.  
2 **A Could you explain what you mean,**  
3 **"oversight"?**  
4 Q Meaning was there a process for you to  
5 approve or --  
6 **A Me?**  
7 Q For you.  
8 **A Oh, for me?**  
9 Q Yes. Yes.  
10 **A Generally, no.**  
11 Q Anybody else that oversaw their responses  
12 prior to it -- them going out from the State  
13 Department?  
14 **A Of the division chief?**  
15 Q Yes.  
16 **A No. Generally not.**  
17 Q Are you aware of any discussions in  
18 regards to the CREW request that was sent to the  
19 State Department in 2012 about Secretary Clinton's  
20 e-mails, or e-mail accounts, about concerns of any  
21 State Department officials that the State  
22 Department's response was incorrect?

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1 MR. PEZZI: Objection. Form.  
2 Foundation.  
3 **A I don't recall.**  
4 Q Have you ever discussed the State  
5 Department's response to the CREW request from  
6 2012 pertaining to Secretary Clinton's e-mail  
7 accounts with John Hackett?  
8 **A I don't recall.**  
9 Q Same question, but with Sheryl Walter?  
10 **A I don't recall.**  
11 Q And the same question, how about Karen  
12 Finnegan?  
13 **A I don't recall.**  
14 Q Were you interviewed by the State  
15 Department's IG, inspector general, with respect  
16 to Secretary Clinton's e-mail use?  
17 **A No.**  
18 Q How about with respect to the State  
19 Department's processing of FOIA requests during  
20 Secretary Clinton's tenure?  
21 **A I believe there was an OIG investigation.**  
22 **It may have been a routine investigation, so I**

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1 **might have spoken to the investigators or -- not**  
2 **investigators, but the people from OIG as part of**  
3 **a routine review of the process.**  
4 **But specifically -- I don't remember**  
5 **anything specifically. It was just general.**  
6 Q When did you speak with the OIG?  
7 **A I don't -- I don't --**  
8 MR. PEZZI: Objection to form.  
9 **A I don't recall.**  
10 Q And I'm not asking for a specific date.  
11 But if you can narrow the time frame by year?  
12 **A I can't.**  
13 Q Or it would have been after Secretary  
14 Clinton's tenure?  
15 **A I don't recall.**  
16 Q But it was about a FOIA processing?  
17 MR. PEZZI: Objection. Form.  
18 **A Yes, I believe so.**  
19 Q Okay. Do you recall reading the  
20 Inspector General's report at the completion of  
21 that investigation and whether there was anything  
22 in the report that you discussed with the IG or

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1 that you disagreed with?

2 MR. PEZZI: Objection. Form.

3 **A I recall reading it, but I really don't**

4 **remember much of what was said, with the exception**

5 **of processing, general processing.**

6 Q Was there a time frame of the processing

7 that was focused on?

8 **A I don't recall.**

9 Q Okay. And by "processing" you mean

10 processing of the FOIA requests?

11 **A Generally.**

12 Q Okay.

13 **A Generally.**

14 Q By your division, or even more general

15 than that?

16 **A By our -- by our division.**

17 Q Okay. I want to get into the processing

18 of FOIA requests, and how they were tasked if

19 records were requested from Secretary Clinton's

20 office during her tenure.

21 Can you explain to me how they would be

22 tasked from your -- from your division?

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1 **A They would be tasked in the manner I**

2 **mentioned before. A tasking, a form requesting**

3 **information, providing them with information,**

4 **asking that they search their records.**

5 Q Okay. And would that be done by you, or

6 would that be done by your branch chief, one of

7 your branch chiefs?

8 **A The taskers --**

9 MR. PEZZI: Object to form.

10 THE WITNESS: Sorry.

11 **A The taskers went out -- were sent out by**

12 **the analysts who worked for the branch chiefs.**

13 Q Okay. So during Secretary Clinton's

14 tenure, would the tasker go directly to Secretary

15 Clinton's office if -- and specifically for

16 records pertaining to records from her office, for

17 requests pertaining to records from her office?

18 **A I don't know exactly where they went. I**

19 **would think that they would go to Mr. Finney.**

20 Q Okay. And how about after Secretary

21 Clinton left; did that process change at all?

22 **A I don't recall.**

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1 Q How about more generally speaking? When

2 a Secretary's no longer in office, so her staff's

3 no longer in the Secretary's office, would the

4 process -- the tasking process change in any way

5 because at that time the officials were no longer

6 there, from the time when they were physically,

7 obviously, in the office?

8 MR. PEZZI: Objection. Form.

9 Foundation.

10 **A I would think that the -- Mr. Finney**

11 **would still be tasked. But would have probably**

12 **tasked Central Files to try to find retired**

13 **records, or whatever Secretary had left behind.**

14 Q Okay. So it would be Mr. Finney, as well

15 as Central Files?

16 **A Correct. And usually Mr. Finney would be**

17 **the one who provides the information as to**

18 **location as to retired files.**

19 Q Okay.

20 MR. PEZZI: We've been going a little

21 over an hour now. I don't know if this is a good

22 time for you to take a break, or if you've got a

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1 good time coming up? Just let us, like --

2 MS. COTCA: We can take a break or we can

3 keep going, whatever. Up to Mr. Scholl.

4 MR. PEZZI: You all right?

5 THE WITNESS: I'm fine.

6 MR. PEZZI: Okay.

7 MS. COTCA: Okay.

8 BY MS. COTCA:

9 Q I've asked you about a photograph that

10 you mentioned earlier about Secretary Clinton

11 holding a BlackBerry, or what looked to be like a

12 BlackBerry device.

13 In 2013 do you recall a review by IPS --

14 and your division was within IPS -- of all FOIA

15 requests pertaining to Secretary Clinton's e-mails

16 in the summer of 2013?

17 **A Could you explain what you mean, "a**

18 **review"?**

19 Q Do you recall a request by Ms. Grafeld

20 for a list of all FOIA requests pertaining to

21 Secretary Clinton's e-mails in the summer of 2013?

22 **A No, I don't recall.**

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1 Q Do you recall any discussions or any  
2 reviews of all FOIA requests pertaining to  
3 Secretary Clinton's e-mails --  
4 MR. PEZZI: Objection.  
5 Q -- during that time frame?  
6 MR. PEZZI: Objection. Form.  
7 **A I don't recall, no.**  
8 Q Do you recall Secretary Clinton's e-mail  
9 becoming an issue within IPS in --  
10 **A Yes.**  
11 Q Okay. Can you tell me more about that?  
12 When? When did that become an issue  
13 and --  
14 **A I don't remember.**  
15 Q Okay. Can you tell me what you recall  
16 about that?  
17 **A I think it was just concern about**  
18 **requests that had come in, and just because of the**  
19 **significance I guess of the picture.**  
20 Q And why would the picture be significant  
21 with respect to the requests that had come in?  
22 **A I don't really know.**

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1 Q Would it be because there would be a --  
2 an e-mail associated to the BlackBerry, and if  
3 requests asked for records pertaining to Secretary  
4 Clinton's e-mails?  
5 **A I don't know.**  
6 Q You don't know?  
7 **A No.**  
8 Q Aren't you -- I mean, you've worked in  
9 FOIA for decades. You don't --  
10 **A Not of significance to me. We had**  
11 **thousands and thousands of requests, and this is**  
12 **just, you know, several requests we got.**  
13 **But we had a tremendous backlog, and was**  
14 **just scrambling to get cases processed, so ...**  
15 Q Do you agree with me that requests  
16 pertaining to a Secretary of State are -- would  
17 normally take -- would get more attention because  
18 it deals with the Secretary of State, as opposed  
19 to other officials and other employees?  
20 **A Generally --**  
21 MR. PEZZI: Objection to form.  
22 **A Generally I would agree.**

75

1 Q Okay. Do you recall Ms. Grafeld ever  
2 requesting a list of all FOIA requests, whether  
3 they were in litigation or not, pertaining to any  
4 other Secretary of State's e-mails during your  
5 time at the State Department?  
6 **A I don't recall.**  
7 Q Is it your position that it was not  
8 significant that Secretary Clinton's e-mails were  
9 an issue back in 2013?  
10 MR. PEZZI: Objection. Form.  
11 **A I have no opinion either way.**  
12 Q Well --  
13 **A Whether it was significant or not.**  
14 Q Was it significant to you?  
15 MR. PEZZI: Objection. Form.  
16 **A No.**  
17 Q I couldn't hear you.  
18 **A No.**  
19 Q Thank you.  
20 Back in -- and I want to focus on the  
21 summer of 2013, when you were the division chief.  
22 **A Uh-huh.**

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1 Q Who did you report to at that -- was it  
2 Ms. Grafeld or --  
3 **A I don't recall. If -- perhaps your --**  
4 **the -- the --**  
5 Q You have -- I mean, you may look at it,  
6 if you need to.  
7 **A I really don't, because there were a lot**  
8 **of -- there was a lot of turnover, so ...**  
9 Q Sure.  
10 **A Did I report to Sheryl Walters?**  
11 **Is that what you're asking?**  
12 Q I'm asking who are the individuals you  
13 reported to?  
14 **A In '13?**  
15 Q Yes.  
16 **A I would have reported to Mr. Hackett and**  
17 **Ms. Walter.**  
18 Q Okay. And I -- and did you also report  
19 to Ms. Grafeld at the time?  
20 **A No.**  
21 Q You did not?  
22 **A No.**

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1 Q Did you interact with Ms. Grafeld in  
2 2013?  
3 **A Interact as in?**  
4 Q In your day-to-day duties and --  
5 **A No.**  
6 Q -- doing your job --  
7 **A Generally.**  
8 Q -- at the State Department?  
9 **A Generally, no.**  
10 Q Okay. When did you begin reporting to  
11 Ms. Grafeld?  
12 **A When I became a division chief back in**  
13 **20 -- well, I became a division chief in 2007.**  
14 Q Division chief of the statutory  
15 compliance?  
16 **A Yes.**  
17 Q Okay. And when did you stop reporting to  
18 Ms. Grafeld, as the division chief to statutory  
19 compliance?  
20 **A I don't recall exactly.**  
21 Q Did you report to her for a number of  
22 years?

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1 **A Two thousand -- whenever I was the**  
2 **division chief until, I believe -- I don't**  
3 **remember the timing, I really don't.**  
4 Q I guess I'm just trying to get a sense of  
5 how much you interacted with Ms. Grafeld during  
6 your position at division chief.  
7 **A For? I was division chief twice. So one**  
8 **was with requestor liaison, one was statutory**  
9 **compliance.**  
10 Q I'm sorry, with statutory compliance. Or  
11 with -- with either of them, actually.  
12 **A Okay. So I would have interacted with**  
13 **her, I believe, or the -- or the deputy at the**  
14 **time, when I was requestor liaison division chief.**  
15 Q Okay. And then when you became the  
16 statutory compliance, is that when you began  
17 reporting to Mr. --  
18 **A I -- I don't remember who was the**  
19 **director at the time. Because Ms. Grafeld became**  
20 **the -- the DAS, Office of the Secretary. So I'm**  
21 **not really sure of the timing of all of this.**  
22 Q Okay. Would a request from Ms. Grafeld,

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1 either as your previous supervisor or superior or  
2 as the deputy assistant secretary, for a list of  
3 all FOIA requests pertaining to Secretary  
4 Clinton's e-mails, would that have sparked special  
5 attention from you?  
6 **A A request to me?**  
7 Q In -- in an e-mail in which you were  
8 included on, yes.  
9 MR. PEZZI: Objection. Form.  
10 **A Particular interest? Yes.**  
11 Q I'm sorry, I couldn't hear you.  
12 **A Particular interest? Yes.**  
13 Q It would have? Okay.  
14 And it was your practice to read  
15 Ms. Grafeld's e-mails during this time period?  
16 **A Yes.**  
17 Q Okay. And the same with Ms. Walter or  
18 Mr. Hackett, who were your superiors?  
19 **A Yes.**  
20 Q Okay. Were there any discussions within  
21 IPS when Mr. Hackett was within IPS that no --  
22 that the Oglesby letters should not be sent out

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1 anymore, or no-records-located responses shouldn't  
2 be sent out anymore pertaining to Secretary --  
3 FOIA requests relating to Secretary Clinton's  
4 e-mails?  
5 MR. PEZZI: Objection. Form.  
6 Foundation.  
7 **A I don't recall.**  
8 Q Would that be of significance?  
9 **A Would what be of --**  
10 MR. PEZZI: Objection. Form.  
11 **A Would what be of significance?**  
12 Q A request or a directive by Mr. Hackett  
13 that the State Department should not issue -- your  
14 division shouldn't issue any further  
15 no-records-located responses to FOIA requestors  
16 pertaining to Secretary Clinton's e-mails.  
17 **A Yes.**  
18 MR. PEZZI: Objection.  
19 Q Would that have been of significance?  
20 **A Yes.**  
21 Q Okay. Do you recall such a directive  
22 from Mr. Hackett in 2013?

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1 A **No, I do not.**  
2 Q Do you recall such a directive from  
3 Mr. Hackett at any time during your tenure at the  
4 State Department?  
5 A **Any type of directive?**  
6 Q No. This particular directive --  
7 A **No.**  
8 Q -- from Mr. Hackett?  
9 A **I do not.**  
10 Q Do you recall any discussions about such  
11 a directive -- and again I'm focusing on the  
12 directive from Mr. Hackett -- that  
13 no-records-located responses should no longer be  
14 sent out to requestors pertaining to Secretary  
15 Clinton's e-mails with anyone else within IPS?  
16 A **I do not recall, no.**  
17 Q Did you ever send any e-mails about such  
18 a directive, or any communications?  
19 A **Not that I recall.**  
20 Q Did you ever search, have you searched  
21 your e-mails about such a directive?  
22 A **No.**

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1 Q Were you asked to search your e-mails  
2 about Mr. Hackett's directive?  
3 A **No.**  
4 Q What is your practice on how you maintain  
5 your e-mail?  
6 A **Specifically ...**  
7 Q Yes. How do you store your e-mail?  
8 A **Store my e-mail? I -- I'm not sure**  
9 **exactly what you mean.**  
10 Q What is your -- how do you maintain your  
11 inbox and your outbox at the State Department?  
12 A **Who do I maintain it?**  
13 Q Yes.  
14 A **I'm not sure I understand your question.**  
15 Q Do you delete e-mails?  
16 A **No.**  
17 MR. PEZZI: Objection. Form.  
18 A **No.**  
19 Q That --  
20 A **I --**  
21 Q That relate to State Department business.  
22 A **No. I --**

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1 Q Go ahead. I'm sorry.  
2 A **That relate to State Department business,**  
3 **no.**  
4 Q How about --  
5 A **I delete junk mail.**  
6 Q Sure.  
7 How about in 2013; what was your practice  
8 in how you maintained your e-mail?  
9 A **It was no different than what I just said**  
10 **to you, that -- I would be referring to whether I**  
11 **delete e-mails, no, I don't delete generally**  
12 **department e-mails.**  
13 Q Do you recall there being a print and --  
14 and file policy at the State Department for  
15 e-mails relating to State Department business, or  
16 for records relating to State Department business?  
17 A **I seem to recall, yes.**  
18 Q Okay. Do you recall that being the  
19 policy back in 2013?  
20 A **I don't recall.**  
21 Q Okay. Did you have a practice of  
22 printing and saving your e-mails relating to State

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1 Department business?  
2 A **Back then?**  
3 Q Yes.  
4 A **No.**  
5 Q I'm sorry?  
6 A **Not that I recall.**  
7 Q How did you save or archive your e-mail  
8 back in 2013?  
9 A **I wouldn't save or archive. I would pull**  
10 **records from -- from -- from my mail. I wouldn't**  
11 **save them.**  
12 Q Would you delete them?  
13 A **No.**  
14 Q Okay. Do you have e-mail going back to  
15 2013 in your e-mail account?  
16 A **I don't recall.**  
17 Q Would they still exist?  
18 MR. PEZZI: Objection. Foundation.  
19 A **I don't know.**  
20 Q Who would know?  
21 MR. PEZZI: Objection. Foundation.  
22 A **I don't know.**

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1 Q Okay. And you were not asked to search  
2 your office for any communications or records  
3 about the directive from Mr. Hackett in 2013  
4 pertaining to the no-records-located responses in  
5 connection with Secretary Clinton's e-mails?  
6 MR. PEZZI: And you can answer that  
7 question other than with respect to any  
8 communications you might have had with department  
9 lawyers.  
10 A **So repeat the question, please?**  
11 Q I'm not asking for communications. I'm  
12 asking have you searched your office for any  
13 records pertaining -- and by "your office" I mean  
14 electronic or paper records -- for any records  
15 pertaining to Mr. Hackett's directive in 2013 --  
16 A **Not that I recall, no.**  
17 Q Okay. Do you know if anyone, anybody  
18 else has?  
19 MR. PEZZI: Objection. Foundation.  
20 A **I don't know.**  
21 Q Do any of your branch chiefs or anybody  
22 else within the State Department have access to

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1 your office without you knowing about it?  
2 MR. PEZZI: Same objection.  
3 A **I don't know.**  
4 Q If -- if you searched your own records  
5 with respect to Mr. Hackett's directive, that's  
6 something that you would recall here today.  
7 Correct?  
8 A **Right.**  
9 Q Okay.  
10 Do you recall any discussions in the  
11 meetings that were held with Mr. Hackett,  
12 Ms. Walter, Ms. Grafeld, in which -- in which  
13 Tasha Thian would have been aware a  
14 no-records-located-response issue was discussed?  
15 MR. PEZZI: Objection. Form.  
16 A **I don't recall, no.**  
17 Q Did you have any discussions with  
18 Mr. Hackett about Secretary Clinton's e-mails in  
19 2013 that you recall here today?  
20 A **Not that I recall.**  
21 Q How about in 2014?  
22 A **Not that I recall.**

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1 Q How about in 2015?  
2 A **Not that I recall.**  
3 Q Did you have any involvement with respect  
4 to the State Department's request to Secretary  
5 Clinton to return her records to the State  
6 Department?  
7 A **Could you repeat?**  
8 Q Yes. Did you have any involvement in the  
9 State Department's request to Secretary Clinton to  
10 return her records to the State Department?  
11 A **Not that I recall, no.**  
12 Q Is that something you would recall?  
13 A **Yes.**  
14 Q Did you have any involvement with respect  
15 to the State Department's collection of Secretary  
16 Clinton's e-mails in December 2014?  
17 A **Not that I recall.**  
18 Q Is that something that you would recall?  
19 A **Yes.**  
20 Q Okay. What about the review process of  
21 Secretary Clinton's e-mails that she returned to  
22 the State Department in December of '14; did you

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1 have any involvement in that process?  
2 A **Not that I recall. Not that I recall.**  
3 Q Is that something that you would recall?  
4 A **Something that I -- would I remember**  
5 **that?**  
6 Q Yes.  
7 A **Yes.**  
8 Q Okay. In the many years and some decades  
9 that you've been at the State Department, has any  
10 other former Secretary of State returned records  
11 to the same degree that Secretary Clinton did?  
12 MR. PEZZI: Objection. Form.  
13 Foundation.  
14 A **I don't recall.**  
15 Q Okay.  
16 MR. PEZZI: Why don't we take a break, if  
17 that's okay with you guys?  
18 MS. COTCA: Sure.  
19 MR. PEZZI: Thanks.  
20 VIDEO SPECIALIST: We are going off the  
21 record at 11:19.  
22 (A recess was taken.)

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1 VIDEO SPECIALIST: We are back on the  
2 record at 11:34.  
3 BY MS. COTCA:  
4 Q Mr. Scholl, before moving on, I have a  
5 few more questions.  
6 After Secretary Clinton's e-mails were  
7 collected by the State Department in December of  
8 2014, were you aware or heard any concerns that  
9 were raised with respect to interference in the  
10 review process of Secretary Clinton's e-mails?  
11 **A I don't recall.**  
12 Q Okay. You don't recall any such  
13 communication -- I'm trying to understand what  
14 you --  
15 **A I don't recall such communications.**  
16 Q Okay. Do you recall -- I mean, were  
17 you -- recall any concerns that was raised by  
18 anybody else?  
19 **A I don't recall any concerns raised by**  
20 **anybody else.**  
21 Q Were you aware or did you have any  
22 knowledge with respect to the process that was

90

1 undertaken for the review of Secretary Clinton's  
2 e-mails?  
3 **A No.**  
4 Q Okay. Since the State Department had  
5 collected Secretary Clinton's e-mails in December  
6 of 2014, did you have any concerns with respect to  
7 interference in the review process of her e-mails?  
8 **A I don't recall. I don't know -- I don't**  
9 **know the date or anything about the collection of**  
10 **her records.**  
11 Q I guess I'm asking if you have had, since  
12 then, any concerns about the review process and an  
13 interference there may have been in the review  
14 process of her e-mails.  
15 MR. PEZZI: Objection. Form.  
16 **A I don't have concerns. It's really not**  
17 **an issue for me.**  
18 Q There's a notation in at least one  
19 interview that -- well, let me back up.  
20 You're aware of the FBI's investigation  
21 into Secretary Clinton's e-mail at the State  
22 Department. Correct?

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1 **A Yes.**  
2 Q Okay. There's a notation in at least one  
3 of the interview notes that the FBI had -- had  
4 released that makes a notation with respect to  
5 weekly meetings held in which -- about FOIA  
6 requests pertaining to Secretary Clinton's e-mails  
7 in which Patrick Kennedy, perhaps Mr. Stein, may  
8 have sat in on.  
9 Do you know anything about these  
10 meetings?  
11 **A I don't know anything about those**  
12 **meetings.**  
13 Q Did you ever attend any of those  
14 meetings?  
15 **A No.**  
16 Q Okay. I guess I just -- I want to go  
17 back a little bit and maybe get some clarification  
18 with respect to meetings that were held within  
19 IPS.  
20 And I guess I'm -- did you as the  
21 division chief hold regular meetings with your  
22 branch chiefs?

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1 **A Yes.**  
2 Q Okay. And can you tell me about those  
3 meetings? How -- how often were they held?  
4 **A It was a weekly meeting.**  
5 Q Weekly meeting.  
6 And who -- who attended those meetings?  
7 **A My branch chiefs.**  
8 Q Okay. And you?  
9 **A And me.**  
10 Q Okay. And what was the purpose of those  
11 meetings?  
12 **A Just to find out what's been going on,**  
13 **are there any issues dealing with processing of**  
14 **requests, staffing, staffing issues.**  
15 Q Okay. How about if a request or an  
16 inquiry had been made from the White House about a  
17 particular request; would that have been something  
18 to be addressed during those meetings?  
19 **A It would have been brought up, I would**  
20 **think, yes.**  
21 Q Okay. And I'm focusing, just to make  
22 sure we're focusing, on 2013. Correct?



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1 A **Sure. Yes.**  
2 Q Okay. All right.  
3 And other than -- were there any notes or  
4 agendas --  
5 A **No.**  
6 Q -- that were taken during those meetings?  
7 A **No.**  
8 Q Okay. Were significant FOIA reports  
9 raised during those meetings?  
10 A **I don't believe so, no.**  
11 Q Okay. Were there any other meetings,  
12 weekly meetings, that you attended?  
13 A **Routine meetings? Would be with my**  
14 **branch chiefs once a week.**  
15 Q Okay. And then how about between the  
16 various divisions and the director of IPS; would  
17 there be any regular meetings?  
18 A **There -- there was a meeting, I believe,**  
19 **once a week with the division chiefs.**  
20 Q Okay. And would Mr. Hackett or  
21 Ms. Walter attend those meetings as well?  
22 A **I believe so, yes.**

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1 Q Okay. And what was the purpose of those  
2 meetings?  
3 A **I guess to discuss what's going on in the**  
4 **other divisions, so you would know what the other**  
5 **divisions were up to.**  
6 Q And when were those usually held?  
7 A **I don't recall. It could have been**  
8 **Thursday morning or Thursday afternoon.**  
9 Q Okay. And how long were those meetings  
10 usually?  
11 A **I don't recall. Hour.**  
12 Q Okay. Were there agendas that were  
13 typically sent out for those meetings?  
14 A **I don't recall agendas.**  
15 Q How about any notes that were taken  
16 during the meetings?  
17 A **I don't recall notes being taken.**  
18 Q How about, like, if there were issues  
19 that were raised during the meetings that required  
20 following up; how would -- was -- how would that  
21 be documented?  
22 A **I'm not sure I understand.**

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1 Q If issues were raised that required  
2 following up during those meetings --  
3 A **Uh-huh.**  
4 Q -- how would those issues be noted or  
5 documented to make sure that they were followed up  
6 on?  
7 A **I don't really recall notes being taken.**  
8 **Individuals would take notes of the import. But I**  
9 **don't -- there was no formal process for taking**  
10 **notes.**  
11 Q Okay. Did you ever take notes during  
12 those meetings?  
13 A **I don't recall taking notes of those**  
14 **meetings necessarily.**  
15 Q What do you mean, "necessarily"?  
16 A **I don't remember taking notes.**  
17 Q Okay. And if you would have taken notes,  
18 what would your practice have been in 2013 with  
19 respect to the notes that you -- your -- your  
20 notes?  
21 A **Right. What would I --**  
22 Q Do with them?

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1 A **Do with them?**  
2 Q Yes.  
3 A **I would have just taken them back to my**  
4 **office and left them in the notebook.**  
5 Q Okay. Is that something you would throw  
6 out?  
7 A **I don't believe so.**  
8 Q Okay. Is that something you would file  
9 away in your paper files?  
10 A **Yes.**  
11 Q Okay. Are those paper files in your  
12 office?  
13 MR. PEZZI: Objection. Form.  
14 A **Are -- you mean if there were any notes?**  
15 Q Yes.  
16 A **But would they be there?**  
17 Q Yes.  
18 A **I don't know.**  
19 Q Do you keep your paper files in your  
20 office -- do you keep any paper files in your  
21 office?  
22 A **I have some paper files in my office.**

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1 Q Okay. Do you have any paper files from  
2 2013 in your office?  
3 A **I don't know. Possibly.**  
4 Q Okay. How are the paper files that you  
5 have in your office organized?  
6 A **They're in a box, organized by subject.**  
7 Q Okay. And then if they're not in your --  
8 in your office, is there any other place where  
9 your paper files would be stored?  
10 A **No.**  
11 Q Okay. So --  
12 A **Not that I -- not that I know of.**  
13 Q Okay. So all of your records from 2013  
14 to the present, paper files particularly, are held  
15 within your office. Is that right?  
16 MR. PEZZI: Objection. Form.  
17 A **It -- yes.**  
18 Q Okay.  
19 A **All that are significant.**  
20 Q I'm sorry?  
21 A **All that are significant.**  
22 Q And what about those that are not

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1 significant or that you deemed not significant?  
2 A **I don't know. Those would be my notes,**  
3 **if I kept the notes, if I still have the notes,**  
4 **would be there. But I don't recall if I -- I**  
5 **don't remember -- remember taking notes at any of**  
6 **these meetings.**  
7 Q Is it your testimony that you did not for  
8 certain or that you don't have memory of it?  
9 A **I don't have memory of it.**  
10 Q Okay. For the division chief weekly  
11 meetings that occurred on Thursdays, was Tasha  
12 Thian one of the individuals who would sit in on  
13 the meetings?  
14 A **I would think she would be as a -- as a**  
15 **division chief.**  
16 Q Okay.  
17 A **During that period, I -- I guess so.**  
18 Q Okay. Did you ever discuss with  
19 Ms. Thian Secretary Clinton's e-mails?  
20 A **I don't recall, no.**  
21 Q Do you ever recall Ms. Thian  
22 communicating or contacting anybody within your

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1 division in regards to Secretary Clinton's  
2 e-mails?  
3 A **I don't recall.**  
4 Q Okay. I want to move to some exhibits  
5 that I'm going to have some questions on.  
6 A **Sure.**  
7 MS. COTCA: While the court reporter is  
8 marking it ...  
9 (A discussion was held off the record.)  
10 (Scholl Deposition Exhibit 2 marked for  
11 identification and is attached to the transcript.)  
12 Q Mr. Scholl, you've been handed what's  
13 been marked as Exhibit 2 in this case, and what's  
14 previously marked as Hackett Exhibit 6 and also  
15 Exhibit 7, the two exhibits from Mr. Hackett's  
16 deposition are combined.  
17 If you can take a look at these. You  
18 don't have to read them line by line, but I want  
19 to give you an opportunity to review them.  
20 You have had a chance to review it?  
21 A **Uh-huh. Yes.**  
22 Q Thank you.

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1 For the record, these are copies of the  
2 December 6, 2012, FOIA request submitted by CREW  
3 that we've been discussing pertaining to Secretary  
4 Clinton's e-mail account, and the State  
5 Department's response to CREW dated May 10, 2013,  
6 copies of which the State Department has publicly  
7 produced in response to a separate FOIA request.  
8 Have you reviewed any documents in  
9 preparation for your deposition today?  
10 A **Yes.**  
11 Q Okay. Have -- did you review these  
12 documents in preparing for today?  
13 MR. PEZZI: And you can answer that  
14 question other than with respect to any meetings  
15 you had with government lawyers.  
16 A **So repeat the question, please?**  
17 Q Yes. Have you seen, have you reviewed  
18 these two documents in preparation for your  
19 testimony today?  
20 MR. PEZZI: Outside the context of any  
21 meetings you had with government lawyers.  
22 A **No.**

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1 Q Okay. Do you recall this FOIA request?  
2 A **No.**  
3 Q How about the response that the State  
4 Department sent out?  
5 A **No.**  
6 Q No? Okay.  
7 Is this an Oglesby letter that you were  
8 referring to earlier in your testimony? And by  
9 "this" I mean the last two pages of the exhibit.  
10 A **Yes.**  
11 Q Let me ask you, do you see here in the  
12 letter, in the response letter of May 10 --  
13 A **Uh-huh, yes.**  
14 Q -- there's a notation -- in the last  
15 paragraph on the first page of the May 10 letter,  
16 there's a notation of the offices that were  
17 searched. And one is the Bureau of Information  
18 Resource Management.  
19 Do you see that?  
20 A **Yes.**  
21 Q Are you familiar with that office?  
22 A **It's an office within the department.**

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1 Q Okay. What is -- what is -- what does  
2 that office do?  
3 A **I'm not sure exactly.**  
4 Q How about the Executive Secretariat's  
5 Information Resource Management Office; do you see  
6 that?  
7 A **Yes, I see it. But I don't know what it  
8 is they do.**  
9 Q Are you aware with any office that  
10 handled all the information management and tech  
11 support, IT support for the Secretary's office  
12 during Secretary Clinton's tenure?  
13 A **Am I aware of it?**  
14 Q Yes.  
15 A **No, I'm not.**  
16 Q Okay. And then how about the Executive  
17 Secretariat's Office, Correspondence and Records?  
18 A **So I believe that's the office you  
19 referred to before, about Clarence Finney.**  
20 Q Mr. Finney?  
21 A **Yes.**  
22 Q Okay. And the notation, "These files

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1 were searched by professional employees familiar  
2 with the contents" or -- "and organization."  
3 Are those -- who are -- are those  
4 professional employees within the -- each  
5 particular office --  
6 MR. PEZZI: Object.  
7 Q -- that would have conducted the search?  
8 MR. PEZZI: Objection. Foundation.  
9 A **Yes.**  
10 Q Okay.  
11 A **I believe so.**  
12 Q Okay.  
13 From reviewing the request from CREW and  
14 also the response that the State Department sent,  
15 did CREW make a request that the FOIA request be  
16 processed on an expedited basis?  
17 A **It appears so, yes.**  
18 Q Where?  
19 A **Is it expedite? I'm not sure.  
20 It doesn't appear to.**  
21 Q I'm sorry? I didn't hear you.  
22 A **It doesn't appear to.**

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1 Q It does not appear to?  
2 Is that what you said?  
3 A **Yes.**  
4 Q Okay. Can you explain what expedited  
5 basis requests are, what that refers to?  
6 A **Expedited requests would be a request  
7 that would be taken out of queue and put in a  
8 queue with other requests, expedition --  
9 expeditious processing requests that we had  
10 previously received. So it would be in the queue  
11 of expedited cases.**  
12 Q Okay. And do all requests that are --  
13 that come into the State Department requesting  
14 expedited review, do they all get approved to be  
15 expedited?  
16 MR. PEZZI: Objection. Foundation.  
17 A **I don't know.**  
18 Q Who determines whether a request --  
19 whether a requestor's request for expedited review  
20 will be granted or not?  
21 A **The requestor liaison division.**  
22 Q Okay. When you were the chief for that

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1 division, did you receive requests asking for  
2 expedited reviews?  
3 **A Yes.**  
4 Q Okay. Did you grant all those requests  
5 for expedited reviews?  
6 **A All of them?**  
7 Q Yes.  
8 **A I don't recall.**  
9 Q Is that something that is normally  
10 granted, or is that more of an unusual  
11 circumstance, for it to be taken out of queue and  
12 expedited?  
13 **A You mean is it routine for us to grant**  
14 **expeditious processing?**  
15 Q Correct.  
16 **A There's really no routine. There's no --**  
17 **there's no set policy.**  
18 Q Okay. As the division chief in the  
19 requestor liaison's division, did you ever  
20 expedite a request, even though the requestor did  
21 not ask for it to be expedited?  
22 **A Not that I recall. I don't recall either**

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1 **way. Because those decisions were generally made**  
2 **by the branch chief.**  
3 Q As the division chief, you wouldn't  
4 oversee or that wouldn't be something that would  
5 normally be discussed during your weekly meetings?  
6 **A I don't recall.**  
7 Q And just for the record, to make sure  
8 we're talking about the same request, the response  
9 letter from the State Department dated May 10, is  
10 it accurate that I'm stating that this request was  
11 assigned Request Number F-2012-40981?  
12 **A It appears from the document, yes.**  
13 Q Yes. Thank you. I think that's all I  
14 have on that. Okay. The next one.  
15 (Scholl Deposition Exhibit 3 marked for  
16 identification and is attached to the transcript.)  
17 Q Just let me know once you've had a chance  
18 to review.  
19 **A Sure. Okay.**  
20 Q Okay. Thank you.  
21 MS. COTCA: And, for the record, this is  
22 a four-page document Bates-stamped at the bottom

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1 DOS 899, previously marked as Walter Exhibit 2.  
2 Q Mr. Scholl, have you ever seen this  
3 document before?  
4 MR. PEZZI: And again, outside the  
5 context of any meetings you may have had with  
6 government lawyers.  
7 MS. COTCA: Okay. So the question is  
8 actually if he has ever seen this document before.  
9 I'm not asking at all whether it was with  
10 attorneys or nonattorneys. I'm just asking him if  
11 he's seen this document before.  
12 MR. PEZZI: And I --  
13 MS. COTCA: So I don't think it goes to  
14 any attorney-client privilege here.  
15 MR. PEZZI: I will offer the same  
16 instruction.  
17 You can answer outside the context of any  
18 meetings you had with any government lawyers.  
19 **A I've never seen this before.**  
20 Q Okay. I want to point you to the bottom  
21 of the third page of the exhibit. The last page  
22 is just a signature block, I believe, from

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1 Ms. Walter.  
2 It's an e-mail from Sheryl Walter, looks  
3 like to Rosemary D. Reid, and Patrick D. Scholl,  
4 dated December 20th, 2012; with the subject, "Need  
5 to track down a FOIA request from CREW."  
6 Do you see that?  
7 **A Yes, I do.**  
8 Q I just want to make sure that we have the  
9 right parties here.  
10 That's Ms. -- is that Ms. Walter, the  
11 director of IPS in 2012, 2013?  
12 **A I believe it is, yes.**  
13 Q Okay. And Patrick Scholl, was that you?  
14 **A Yes.**  
15 Q Okay. And how about Rosemary Reid; who  
16 was she?  
17 **A She was the -- I believe she was the**  
18 **division chief for requestor liaison who does the**  
19 **intake.**  
20 Q Okay. Back in 2012 -- well, do you  
21 recall seeing this e-mail, receiving this e-mail  
22 from Ms. Walter?

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1 A No.  
2 Q Okay. Was your practice to read  
3 Ms. Walter's e-mails when you received any?  
4 A Yes.  
5 Q Okay. And that's because she was the  
6 director of IPS.  
7 A Yes.  
8 Q Right? Okay.  
9 Do you see where it says, "WH called,  
10 have we received" -- WH for White House --  
11 "called. Have we received a FOIA request from  
12 CREW."  
13 Do you see that?  
14 A Yes.  
15 Q Okay. And then later in the paragraph  
16 she says, "If we have it can you give me the  
17 details so I can call the White House back. I  
18 think they'd like it on quick turnaround. Thanks,  
19 Sheryl."  
20 A Well, do I see that? Yes. WH, that she  
21 wants the information so she can pass the  
22 information to WH.

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1 Q Okay. And what do you think WH is?  
2 A I don't know.  
3 Q Do you have any reasons to say it  
4 wouldn't be the White House?  
5 A Not really, no.  
6 Q Okay. Do you recall any discussions with  
7 Ms. Reid or Ms. Walter about any inquiries from  
8 the White House with respect to any FOIA request  
9 back during this time frame?  
10 A I don't recall, no.  
11 Q Do you see up above the same page, the  
12 request is assigned Case Number F-2012-40981.  
13 Where it's an e-mail from Ms. Walter to Heather  
14 Samuelson, dated January -- December 20, 2012, the  
15 same date.  
16 Is that the same FOIA request as the CREW  
17 request that we've been talking about?  
18 A I would assume so. Is this the same  
19 number? I don't have it.  
20 Q Well, I just -- oh, it's right there next  
21 to you.  
22 A It doesn't appear to be the same.

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1 Q Are you looking at the top of this sheet?  
2 A Yes.  
3 Q Okay. That is in regards to the --  
4 A The location?  
5 Q -- a different FOIA request which State  
6 Department produced these documents.  
7 But I believe the FOIA request assigned  
8 to the CREW request is on the second-to-the-last  
9 page of the exhibit, and the State Department's  
10 response to CREW.  
11 A I see it here.  
12 Yes, it seems -- appears to be.  
13 Q Okay. And once more, did you know that  
14 Ms. Samuelson was the White House liaison for the  
15 State Department during this time frame?  
16 A No.  
17 Q Okay. Have you ever worked with  
18 Ms. Samuelson?  
19 A Not that I recall.  
20 Q Okay. Was it unusual that the White  
21 House liaison's office would be involved in  
22 following a FOIA request?

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1 A I don't know if it's unusual or not.  
2 Q Well, you were the division -- the  
3 division chief for all FOIA requests that were  
4 sent to the State Department. As the division  
5 chief for all this time, did you have any other  
6 cases in which the White House liaison's office  
7 for the State Department was involved in a FOIA  
8 case?  
9 A Not that I recall.  
10 Q Okay. That's all I have. You can put  
11 that away.  
12 (Scholl Deposition Exhibit 4 marked for  
13 identification and is attached to the transcript.)  
14 A Okay.  
15 MS. COTCA: Okay. And just for the  
16 record, this is Exhibit 3. Right? Exhibit 4.  
17 Sorry. What's been marked as Exhibit 4 is a  
18 two-page document with the State Department's  
19 Document Number C06125549.  
20 Q Is that what you have?  
21 A What do you mean? Where?  
22 Q The State Department's document numbers I

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1 believe --

2 **A I got it.**

3 Q -- start with a C?

4 **A Yes, it is.**

5 Q Okay. Thank you.

6 Have -- which looks, appears to be an

7 e-mail string, again dated December 20, 2012, in

8 regards to this request from CREW.

9 Have you seen this document before?

10 **A Not that I recall.**

11 MR. PEZZI: I will give the same

12 instruction.

13 Q Okay. Just make sure you let your

14 attorney --

15 **A I'm sorry.**

16 Q -- finish his objection on the record

17 before answering.

18 MR. PEZZI: Thanks.

19 MS. COTCA: Sure.

20 Q You see the top of the document, the

21 first e-mail, it appears to be an e-mail from you,

22 Patrick Scholl, to Terry Gordon. Is that right?

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1 **A Yes.**

2 Q Okay. And Terry Gordon I believe you've

3 identified before as one of your branch chiefs?

4 **A Yes.**

5 Q Okay. Which division or section?

6 **A He was the branch chief for management**

7 **and public diplomacy, MPD.**

8 Q And again, what did the MPD do?

9 **A Mostly administrative or privacy type**

10 **requests, including some FOIAs. They also dealt**

11 **with the decentralized offices that did their own**

12 **reviews.**

13 Q What -- what do you mean by

14 "decentralized offices"?

15 **A Certain bureaus do searches and reviews.**

16 Q Okay. And which bureaus are those?

17 **A The Bureau of Consular Affairs.**

18 Q How about any of the offices pertaining

19 to Secretary Clinton?

20 **A Pertaining to?**

21 Q Her office.

22 **A No.**

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1 Q Okay.

2 Do you see your e-mail at the top, the

3 same e-mail. "Terry, has this case been

4 assigned?" It looks like you are asking him.

5 Question mark. And then you tell him. "Probably

6 should be assigned pronto," with two exclamation

7 marks.

8 Do you see that?

9 **A Yes.**

10 Q Okay. And just for the record, that is

11 the same FOIA request number as the CREW request

12 number identified on Exhibit 2.

13 Is that right? I just want you to --

14 **A Yes, it is.**

15 Q I just want you to confirm.

16 **A Yes, it is.**

17 Q Okay. Thank you. Okay.

18 Do you know why you asked Mr. Gordon to

19 assign this case -- well, what do you mean by

20 "pronto"? I mean, right away?

21 **A Yes.**

22 Q Okay. Why did you ask Mr. Gordon to

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1 assign this case right away?

2 **A Because Ms. Walter had asked about it.**

3 Q Does the fact that the White House had an

4 interest and called in regards to this FOIA

5 request affect the speed with which and the manner

6 with which a FOIA request is handled and

7 processed?

8 **A No. I think we were scrambling to try to**

9 **process requests as quickly as possible. And I**

10 **wanted to make sure this wasn't -- didn't fall**

11 **through the track -- the cracks.**

12 Q Well, I believe in Ms. Walter's earlier

13 e-mail she stated, I'd like -- something to the

14 effect that I'd like a quick turnaround on this

15 because she believes the White House wanted a

16 quick turnaround on that with --

17 **A My understanding is that -- go ahead.**

18 Q Why don't you go ahead and take a look at

19 the e-mail.

20 MR. PEZZI: Exhibit 3?

21 MS. COTCA: Exhibit 3, yes.

22 Q Ms. Walter's December 20, 2012, e-mail.

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1 I believe it's on the third page of the exhibit.  
2 **A It's in here, too. Right? Right? Or**  
3 **not.**  
4 **I believe she's asking for a quick**  
5 **turnaround in response to whether we received it.**  
6 Q Okay. Does the fact that the White House  
7 have an interest in the request, would that have  
8 had any effect on how this request was handled?  
9 MR. PEZZI: Objection. Form.  
10 **A No.**  
11 Q Okay. I think that's all I have on that  
12 one.  
13 (A discussion was held off the record.)  
14 (Scholl Deposition Exhibit 5 marked for  
15 identification and is attached to the transcript.)  
16 **A Okay.**  
17 MS. COTCA: Okay. And again for the  
18 record, what's been marked as Exhibit 5 is a  
19 three-page document with -- bearing the document  
20 name -- number from the State Department  
21 C06125550.  
22 Q Is that accurate?

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1 **A Yes.**  
2 Q Okay. Thank you.  
3 This again is another e-mail chain in  
4 regards to this FOIA request, the CREW request.  
5 Have you seen this document before?  
6 MR. PEZZI: And I give the same  
7 instruction as before.  
8 **A Not that I recall.**  
9 Q Okay. Let me ask you, in Ms. Walter's  
10 e-mail dated December 20th, 2012, and then also in  
11 the e-mail appearing on the bottom of the first  
12 page of the document, from IPS-staff-assistants.  
13 Do you see that?  
14 **A Yes, I do.**  
15 Q Okay. Who -- who are the IPS staff  
16 assistants? Who has that e-mail address?  
17 **A I don't know. I do believe -- they**  
18 **probably work for Sheryl Walter.**  
19 Q Okay. And on the e-mail at the bottom of  
20 the first page of the exhibit.  
21 **A Uh-huh.**  
22 Q From IPS staff assistants, to Ms. Walter,

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1 with a cc to you and Rosemary Reid. Same date,  
2 December 20th, 2012.  
3 Do you agree that it states that this  
4 request was processed or treated as a complex  
5 case?  
6 **A That's what it says, yes.**  
7 Q Okay. Do you have any reason to believe  
8 that it wasn't treated as such?  
9 **A I have no reason --**  
10 Q Okay.  
11 **A -- to believe otherwise.**  
12 Q Okay. And again just to make sure we  
13 have everything accurate, do you agree that this  
14 e-mail references the same FOIA case number that  
15 is referenced in Exhibit 2?  
16 **A Yes.**  
17 Q Okay. Thank you.  
18 Were all FOIA requests that related to  
19 Secretary Clinton's e-mail in 2012 treated as  
20 complex cases?  
21 **A I don't recall.**  
22 Q You don't know or -- I'm trying to

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1 understand what you mean by you don't recall.  
2 Because, I mean, the question is yes or no. And  
3 if you don't know, that's fine.  
4 **A I don't know.**  
5 Q You don't know?  
6 **A I don't know whether it was or not.**  
7 Q Okay. Do you know if FOIA requests for  
8 Secretary Clinton, if there was a practice to  
9 treat them as complex cases by the State  
10 Department while she was in office?  
11 **A I don't recall.**  
12 Q That's fine. You can put that aside for  
13 now.  
14 Actually, hold on.  
15 Okay.  
16 (Scholl Deposition Exhibit 6 marked for  
17 identification and is attached to the transcript.)  
18 Q Mr. Scholl, you've been handed what's  
19 been marked as Exhibit 6. Just for the record, do  
20 you read that it's -- it's actually been marked as  
21 DOS document 901 at the bottom. This is a  
22 document that was produced by the State

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1 Department, to Judicial Watch, in this, in the  
2 discovery of this case.  
3 **A It is marked DOS --**  
4 Q Okay.  
5 **A -- 901\_0001.**  
6 Q Thank you.  
7 Go ahead. I want to give you an  
8 opportunity to review this.  
9 **A Okay.**  
10 Q Okay. Have you seen this document  
11 before?  
12 MR. PEZZI: Same instruction.  
13 **A Not that I recall.**  
14 Q Okay. I want to point you to the bottom  
15 of Page 4 of the exhibit, in the e-mail chain.  
16 Okay. Where it's an e-mail from Edgar  
17 Jaramillo, to -- it looks like to you and Terry  
18 Gordon.  
19 Do you see that?  
20 **A Yes.**  
21 Q Okay. Is this an e-mail that you  
22 received from Mr. Jaramillo?

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1 **A It appears to be, yes.**  
2 Q Okay. And -- I'm sorry, did I cut you  
3 off? I didn't mean to.  
4 **A I'm sorry.**  
5 Q And again, just for the record, I want to  
6 make sure this is in regards to the same FOIA  
7 request number for the CREW request of 2012-40981,  
8 that appears on Exhibit 2.  
9 You may just want to leave that out.  
10 **A Yes, this is the same number.**  
11 Q Okay. Did Mr. Jaramillo inform you that  
12 the White House has -- had an interest in knowing  
13 from FOIA about the CREW request back in March of  
14 2013?  
15 **A Not that I recall.**  
16 Q According to this document that --  
17 Mr. Jaramillo inform you that the White House had  
18 an interest in knowing --  
19 **A In this instance, yes, he did.**  
20 Q Okay. Let me ask you, Mr. Jaramillo is  
21 assigned to a different branch than Mr. Gordon.  
22 Is there a reason? Mr. -- it looks like

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1 Mr. Jaramillo is in the EAN branch and Mr. Gordon  
2 was in the, I think you said PBD, or -- what was  
3 the branch for Mr. Gordon?  
4 **A Mr. Gordon at this time was a branch  
5 chief for EAN. He is currently the branch chief  
6 for MPD.**  
7 Q Oh. Okay.  
8 At the time of the CREW request, was  
9 Mr. Gordon branch chief for EAN the entire time?  
10 **A I believe so.**  
11 Q Okay. Thank you.  
12 Then do you see the e-mail above that?  
13 Is that an e-mail from you to Ms. Walter,  
14 letting her know that the -- you believe that the  
15 White House was tracking these cases?  
16 **A Yes.**  
17 Q Okay. What did you mean by "these  
18 cases"?  
19 **A I would think there are probably multiple  
20 requests for the same subject.**  
21 Q Okay. And what do you mean by "the same  
22 subject"?

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1 **A In this particular case, there's -- I  
2 don't really recall exactly why I would say  
3 "multiple." Because I don't recall if there were  
4 many, or this particular request was the only one.**  
5 Q Okay. But I'm asking what the subject  
6 matter is as you understand it.  
7 **A Yeah. I don't recall.**  
8 Q Well, from this document can you tell  
9 that it's about Secretary Clinton's e-mail?  
10 **A Yes.**  
11 Q Okay. And from reviewing the CREW  
12 request and the State Department's response, do  
13 you agree that it -- the subject matter is about  
14 Secretary Clinton's e-mail?  
15 **A It appears to be, yes.**  
16 Q Okay. Thank you.  
17 And Mr. Jaramillo's e-mail to you and  
18 Terry Gordon, why did he include you in his e-mail  
19 to report with the tasking of SC -- SCR and IRM  
20 and their search results?  
21 MR. PEZZI: Objection. Form.  
22 **A He included me as a division chief.**



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1 Q Okay. So did you normally receive  
2 communications from officials within your division  
3 with respect to the search results and how the  
4 State Department would proceed?  
5 **A I'd receive -- sometimes I was included**  
6 **in e-mails regarding the processing of some**  
7 **requests.**  
8 Q Okay. Because I thought earlier you  
9 testified that you were not involved in the  
10 processing of any requests during your time as  
11 division chief.  
12 MR. PEZZI: Objection. Form.  
13 **A I don't -- I -- involved in the**  
14 **processing, being made aware of an issue or**  
15 **dealing with an issue as part of -- as a manager,**  
16 **yes, I would be involved. But processing the**  
17 **actual requests, no.**  
18 Q What do you mean -- what do you  
19 understand processing to mean?  
20 **A Processing requests would mean search,**  
21 **sending out search taskers and processing the**  
22 **reviews, contacting the bureaus that have been**

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1 **tasked, doing searches, like of central files.**  
2 Q What about how the State Department would  
3 respond; is that part of the processing?  
4 MR. PEZZI: Objection. Form.  
5 Q As you understand it.  
6 **A I'm not sure I understand your question.**  
7 Q Well, with respect to being informed what  
8 the search results are and how the State  
9 Department would respond to a FOIA request, do you  
10 understand that as being part of processing a FOIA  
11 request?  
12 **A In this --**  
13 MR. PEZZI: Objection to form.  
14 **A In this context, yes.**  
15 Q Okay. Thank you.  
16 Sitting here today, after -- well, after  
17 reviewing this e-mail chain, this document, does  
18 this help refresh your recollection at all about  
19 the CREW FOIA request and the handling of the  
20 request and the response sent out to CREW?  
21 **A Yes.**  
22 Q Okay. And what do you recall about the

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1 request at this point?  
2 **A All that's stated in the documents here**  
3 **is all that refreshes -- that's all I know, what I**  
4 **see here in front of me. I don't -- it doesn't**  
5 **cause me to think of anything further.**  
6 Q Does -- does it refresh your recollection  
7 with respect to any communications or discussions  
8 you may have had with Ms. Walter about the White  
9 House's interest in this FOIA request?  
10 **A No.**  
11 Q Does it help refresh your recollection  
12 with respect to any communications you had with  
13 Ms. Walter about this FOIA request in general?  
14 **A No.**  
15 Q How about with Mr. Hackett?  
16 **A No.**  
17 Q How about with Mr. Gordon?  
18 **A No.**  
19 Q Your branch chief. No? Same? Same  
20 answer?  
21 **A No.**  
22 Q Yeah. Okay. On the second -- no, I'm

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1 sorry, third page of the exhibit. Do you agree  
2 that there's an e-mail from you to Mr. Jaramillo,  
3 telling him to hold off on this request and to let  
4 Sheryl take the lead and coordinate?  
5 **A Do I -- do I see that?**  
6 Q Yes.  
7 **A Yes.**  
8 Q Do you agree that that's your e-mail?  
9 Is that your e-mail?  
10 **A It appears to be, yes.**  
11 Q Okay. And is Sheryl, does that refer to  
12 Sheryl Walter, the director of IPS?  
13 **A Yes, it does.**  
14 Q Okay. Why did you inform Mr. Jaramillo  
15 for Sheryl to take lead and to coordinate the --  
16 MR. PEZZI: Objection to form.  
17 Q -- this FOIA request?  
18 MR. PEZZI: Objection. Form.  
19 **A Because it's a -- it appears to be a**  
20 **significant request, because it's a concern to the**  
21 **White House.**  
22 Q Do you recall any other FOIA requests

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1 that concerned the White House during Secretary  
2 Clinton -- well, during your time as division  
3 chief?  
4 **A No, I don't.**  
5 Q What would normally have been the  
6 process?  
7 **A I don't understand.**  
8 MR. PEZZI: Objection. Form.  
9 Q So you asked Mr. Jaramillo to let Sheryl  
10 take the lead and coordinate.  
11 What would have been the process, had you  
12 not -- had Sheryl not taken the lead to  
13 coordinate?  
14 MR. PEZZI: Objection. Form.  
15 **A I'm not really sure.**  
16 Q Well, according to the e-mail string in  
17 this document, is it fair to say that the normal  
18 process would have been for the State Department  
19 at that point to sent an Oglesby letter?  
20 MR. PEZZI: Objection. Form.  
21 Q And I'm looking on Page 4 of the exhibit.  
22 **A Yeah, that's a hypothetical. I really**

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1 **couldn't tell you.**  
2 Q I don't think it's a hypothetical,  
3 because I'm reading directly from your e-mail to  
4 Ms. Walter, dated March 28, 2013, time-stamped  
5 9:04, on Page 4 of the document.  
6 Do you see that?  
7 **A Which one? Which page was it?**  
8 Q Page 4.  
9 **A Okay.**  
10 Q E-mail from you to Ms. Walter, dated  
11 March 28, 2013, time-stamped 9:04.  
12 Do you see that?  
13 **A Yes, I see that.**  
14 Q Okay. Is that your e-mail to Ms. Walter?  
15 **A Yes, it is.**  
16 Q Okay. So you agree that it's not a  
17 hypothetical?  
18 MR. PEZZI: Objection. Form.  
19 **A If -- if it didn't go to Ms. Walter, I do**  
20 **not know whether it had been processed in course.**  
21 **I don't know that.**  
22 Q Okay. Well, according --

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1 **A I don't --**  
2 Q I'm sorry. Go ahead.  
3 **A There might have been other people to**  
4 **look -- who would have looked at this before**  
5 **sending it out. So it is I think pending. But I**  
6 **don't think the decision had been made.**  
7 Q Okay. Do you see where you in the same  
8 e-mail to Ms. Walter, you say, "Neither SESCO nor  
9 IRM retrieved responsive documents."  
10 Does this help refresh your recollection  
11 at all as to what IRM is?  
12 **A No, it doesn't.**  
13 Q I can point you to Page 3.  
14 And this is Mr. Jaramillo's e-mail to  
15 you, dated March 29, 2013, time-stamped 11:31 a.m.  
16 Do you see that?  
17 **A Yes, I do.**  
18 Q Okay. Is that an e-mail from  
19 Mr. Jaramillo to you, and also a copy to Terry  
20 Gordon?  
21 **A It appears to be, yes.**  
22 Q Okay. In there he indicates, Should I --

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1 "Pat, should I follow up with Karen and Jonathan  
2 on this one."  
3 Do you see that?  
4 **A Yes.**  
5 Q Okay. Who's Karen?  
6 **A That would be I think Karen Finnegan.**  
7 Q Okay. And how about Jonathan?  
8 **A I -- I don't recall.**  
9 Q Okay. And Karen Finnegan, she was the  
10 division for the requestor liaison's office?  
11 **A No. Ms. Finnegan was the division chief**  
12 **for the policy and plans division.**  
13 Q Why would Mr. Jaramillo ask to follow up  
14 with Ms. Finnegan?  
15 MR. PEZZI: Objection. Form.  
16 **A I don't know.**  
17 Q Do you know Jonathan Davis?  
18 **A I don't recall.**  
19 Q Does the name ring a bell at all?  
20 **A The name rings a bell, yes.**  
21 Q Okay. And who is Mr. Davis?  
22 **A I think he worked in L.**

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1 Q What is L?  
2 A **Office of Legal Advisor.**  
3 Q Okay. And he was an attorney in the  
4 Office of Legal Advisor?  
5 A **I believe so.**  
6 Q Okay. Is he still there now?  
7 A **I don't know.**  
8 Q Okay. I want to point you on Page 2, the  
9 bottom of Page 2.  
10 It looks like there's an e-mail from you  
11 to Ms. Sheryl, again about the same FOIA request  
12 from CREW, pertaining to Secretary Clinton's  
13 e-mail, dated April 4, 2013.  
14 Do you see that?  
15 A **Yes.**  
16 Q Okay. And there it states, Sheryl,  
17 anything new on this one? I think it says "on  
18 this one." Or, "this one."  
19 A **Yes.**  
20 Q Okay. You agree that this is an e-mail  
21 you sent to Ms. Walter about this FOIA request?  
22 A **It appears to be, yes.**

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1 Q Okay. Was this a request that you were  
2 following?  
3 A **Only since I received, as far as I can  
4 tell, notification from Mr. Jaramillo. And I  
5 think it had come up also from Ms. Walter.**  
6 Q Back in December of 2012?  
7 A **Yeah.**  
8 Q Okay.  
9 A **Was I following?**  
10 Q Yes.  
11 A **No.**  
12 Q You were not?  
13 A **Not that I can recall.**  
14 Q Okay.  
15 A **You mean follow as in daily dealing with  
16 the status of it? No, I don't recall that at all.**  
17 Q With respect to the status of the  
18 request, do you agree that these documents and  
19 these e-mail chains indicate that you were  
20 following this request from December 20th, 2012,  
21 when Ms. Walter first e-mailed you about it, to  
22 until at least April 4, 2013?

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1 MR. PEZZI: Objection. Form.  
2 A **I don't think I was following it.**  
3 Q Well, how would you describe it?  
4 A **I was included in some e-mails, but I  
5 wasn't actively -- I wasn't actively checking on  
6 the status as far as that I can recall.**  
7 Q Well, what about this April from April 4,  
8 2013, where you wrote, "Sheryl, anything new on  
9 this one"?  
10 Do you see that?  
11 A **Uh-huh.**  
12 Q Would you not describe that as following  
13 or inquiring about the status of this --  
14 A **Inquiring. Inquiring, yes. I'm sorry.**  
15 Q Okay.  
16 A **But that was in response to the inquiry  
17 from Mr. Jaramillo. But I didn't, from what I  
18 recall, actively follow this.**  
19 Q Why were you following up on the status  
20 of this FOIA request, when you previously  
21 testified that you weren't typically involved in  
22 the processing of FOIA requests as the division

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1 chief?  
2 MR. PEZZI: Objection. Form.  
3 A **As you said, that I had recounted, I said  
4 typically. You know, there would be instances  
5 such as this where I would be involved.**  
6 Q And wouldn't -- but wouldn't that then,  
7 because it would be a rare instance, wouldn't that  
8 mean that you would -- that it would stand out in  
9 your memory, and that you would recall --  
10 MR. PEZZI: Objection.  
11 Q -- information about such requests?  
12 MR. PEZZI: Objection. Form.  
13 A **I can't say that, based on your  
14 characterization, I would remember this, no.**  
15 MR. PEZZI: I think we've been going for  
16 just over an hour now. It's 12:40. You know, I  
17 don't know whether it would be a good time to take  
18 a break for lunch or we're approaching a time --  
19 MS. COTCA: Let's go off the record.  
20 VIDEO SPECIALIST: We are going off the  
21 record at 12:38.  
22 (A recess was taken.)

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1 VIDEO SPECIALIST: We are back on the  
2 record at 13:45.  
3 (Scholl Deposition Exhibit 7 marked for  
4 identification and is attached to the transcript.)  
5 **A Finished with this one?**  
6 Q Yes. For now.  
7 Mr. Scholl, you've been handed what's  
8 been marked as Exhibit 9 -- oh, Exhibit 7. Sorry  
9 about that. And it is a six-page e-mail chain,  
10 bearing the State Department Document Number  
11 C06125546.  
12 Do you see that either at the top or the  
13 bottom of each page?  
14 **A Yes, I do.**  
15 Q Okay. And you agree with me that this is  
16 an e-mail chain again between you and  
17 Mr. Jaramillo and others within IPS, with respect  
18 to the CREW request?  
19 **A Yes.**  
20 Q Okay. Thank you.  
21 Have you seen this document before?  
22 **A No.**

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1 Q Okay.  
2 **A Not that I recall.**  
3 Q Okay. And, again, are these -- do you  
4 agree that some of -- this is an e-mail chain that  
5 includes e-mails to and from you?  
6 **A Yes.**  
7 Q Okay. Do you see, I want to point you to  
8 the first e-mail on the first page.  
9 **A Uh-huh. Yeah.**  
10 Q Appearing from the top of this exhibit.  
11 That looks to be like an e-mail from you  
12 to Edgar Jaramillo. Stating, "Edgar, incorporate  
13 the language below in the Oglesby and have Gene  
14 clear on the letter."  
15 Do you see that?  
16 **A Yes.**  
17 Q Okay. You agree that that's an e-mail  
18 that you sent to Mr. Jaramillo on May 1st, 2013?  
19 **A Yes, it appears to be.**  
20 Q Okay. Who is Gene?  
21 **A Gene? I think he's one of the addressees**  
22 **from down below.**

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1 Q Is that Gene Smilansky?  
2 **A It appears to be, yes.**  
3 Q Okay. Are you familiar with  
4 Mr. Smilansky?  
5 **A Familiar? Yeah, I am familiar with him.**  
6 Q Okay. And who is he? What's his  
7 position?  
8 **A I believe he was an attorney in -- in the**  
9 **Office of Legal Advisor.**  
10 Q Okay. And, again, going back to trying  
11 to understand your role with respect to the CREW  
12 request dated from December 2012 regarding  
13 Secretary Clinton's e-mails. So I'm looking at  
14 this e-mail to Mr. Jaramillo from you.  
15 Why did you ask Mr. Jaramillo to  
16 incorporate language into the Oglesby letter?  
17 **A I don't recall.**  
18 Q Why were you involved in the process of  
19 preparing an Oglesby letter with respect to this  
20 request?  
21 **A I don't recall.**  
22 Q And you agree that, based on your prior

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1 testimony with respect to your responsibilities  
2 and activities as the division chief, it was  
3 unusual for you to get involved to this detail in  
4 a particular FOIA request?  
5 MR. PEZZI: Objection. Form.  
6 **A I don't recall whether this is unusual or**  
7 **not. My characterization, I really don't -- I**  
8 **don't really recall.**  
9 Q You don't recall your characterization  
10 with respect to your involvement in FOIA requests  
11 from earlier this morning?  
12 **A With -- with regard to what?**  
13 Q With regard to how you were involved in  
14 processing FOIA requests at the State Department  
15 while you were the division chief.  
16 **A So --**  
17 Q In 2013.  
18 **A So -- could you repeat the question,**  
19 **please?**  
20 Q Sure. I'm trying to understand why,  
21 based on your testimony earlier today, that as the  
22 division chief you were not -- I believe your

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1 testimony was that you were not typically involved  
2 in the processing of FOIA requests; that it was  
3 your branch chiefs who were involved in that  
4 process, and you didn't really oversee that.  
5 Why were you involved to this degree in  
6 processing the CREW request?  
7 MR. PEZZI: Objection. Form.  
8 Q As indicated in this -- this e-mail, and  
9 in the e-mails we've reviewed.  
10 MR. PEZZI: Same objection.  
11 **A I don't recall. Though, as you said**  
12 **before, typically.**  
13 Q What's typically?  
14 **A Typically means not -- not as a rule I**  
15 **would be involved. There might be occasions where**  
16 **I was involved.**  
17 Q Do you recall any other circumstance  
18 where you were involved in the drafting of an  
19 Oglesby letter from your department?  
20 **A I don't recall.**  
21 Q Do you agree that that's unusual, that  
22 you would be involved in drafting such a letter as

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1 the division chief?  
2 **A I don't think it's unusual or complex. I**  
3 **don't think it really was an issue either way.**  
4 Q I don't know what you mean by "is an  
5 issue either way."  
6 **A You think -- you're asking me, again, is**  
7 **it unusual for me to be involved, when I said**  
8 **typically not -- I'm not involved.**  
9 Q Okay.  
10 **A So ...**  
11 Q But you don't remember why you were  
12 involved for this -- for this particular --  
13 **A For this particular case?**  
14 Q Yes.  
15 **A No. No.**  
16 Q Can you just speak -- thank you.  
17 Was that part of the normal process in  
18 your division, for you to draft Oglesby letters or  
19 provide input with respect to Oglesby letters?  
20 **A I didn't draft, nor did I provide input**  
21 **in this case, or so it appears.**  
22 Q Do you agree that you informed

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1 Mr. Jaramillo to incorporate the language below in  
2 the Oglesby letter?  
3 **A That's what it says, yes.**  
4 Q Okay. Do you -- you don't believe that  
5 that indicates that you provided input into the  
6 Oglesby letter that was sent out to CREW?  
7 MR. PEZZI: Objection. Form.  
8 **A The only input was the instruction to**  
9 **incorporate the language into the letter.**  
10 Q Okay. And my question then, is, was that  
11 part of the normal process in your division when  
12 Oglesby letters were sent out?  
13 MR. PEZZI: Objection. Form.  
14 **A Not typically, no.**  
15 Q Okay. After reviewing this e-mail, in  
16 the e-mails we've -- you've seen that were marked  
17 as exhibits in this case relating to the CREW FOIA  
18 request, do any of these refresh your recollection  
19 with respect to the CREW request that was sent to  
20 the State Department regarding Secretary Clinton's  
21 e-mails?  
22 **A No.**

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1 Q Can you tell me why Ms. -- why would  
2 Ms. Finnegan provide input as to language to be  
3 inserted in the Oglesby letter, who is in a  
4 different division from yours?  
5 MR. PEZZI: Objection. Form.  
6 Foundation.  
7 **A Well, according to the org charts, she is**  
8 **policy and plans. And she would be perhaps**  
9 **involved with the formation of language to use.**  
10 Q Was Ms. Finnegan typically involved in  
11 your branch chief's drafting of Oglesby letters  
12 when responding to FOIA requests?  
13 **A Typically? I don't know.**  
14 Q Do you know of any other circumstance  
15 back in 2013 when Ms. Finnegan would have provided  
16 language to be inserted in an Oglesby letter?  
17 **A Not that I recall.**  
18 Q And that was not part of your normal  
19 procedures within your division. Correct?  
20 MR. PEZZI: Objection. Form.  
21 **A Correct.**  
22 Q Does it surprise you that you were

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1 involved or aware of this request to this degree  
2 from December 20th, 2012, when Ms. Walter  
3 initially e-mailed you, all the way through May  
4 1st, 2013, when you sent this e-mail, and that you  
5 have no memory of it?

6 **A I'm not sure I understand. You asked me**  
7 **am I surprised that I don't remember?**

8 Q Yeah.

9 **A No.**

10 Q Why?

11 **A I don't remember what I don't remember.**

12 Q No, I understand you don't remember what  
13 you don't remember. I'm asking you, the fact that  
14 these records and all these e-mails show that you  
15 were involved to a more significant degree than  
16 you typically were ever involved as the division  
17 chief in any FOIA request, does it surprise you  
18 that you would be involved to this degree and that  
19 you have no memory of it?

20 MR. PEZZI: Objection. Form.

21 **A I have no memory of it. Am I surprised?**  
22 **I have no opinion either way.**

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1 Q Do you remember any discussions within  
2 any of the weekly meetings within your division  
3 during this time frame, up to May 1, 2013, about  
4 the CREW request and the State Department's  
5 response to the CREW request?

6 **A No, I don't recall.**

7 Q How about do you recall any -- this  
8 request being brought up in any of the division  
9 meetings, weekly meetings?

10 **A Not that I recall.**

11 Q Okay.

12 MS. COTCA: I think we can move on to the  
13 next one.

14 (Scholl Deposition Exhibit 8 marked for  
15 identification and is attached to the transcript.)

16 **A Okay.**

17 Q Just for the record, Mr. Scholl, this has  
18 been marked as Exhibit 8. And do you agree with  
19 me it's marked as Document Number C06104350 at the  
20 top, or the bottom, of the page?

21 **A Yes, it is.**

22 Q Okay. Thank you.

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1 And again, for the record, do you agree  
2 with me that this relates to the CREW request and  
3 the State Department's Case Number F-2012-40981  
4 that was assigned to the CREW request by the State  
5 Department as marked in Exhibit 2?

6 **A Yes, it appears to be.**

7 Q Okay. I want to point you to the e-mail  
8 appearing from the bottom of the page, from Edgar  
9 Jaramillo to Gene Smilansky, dated May 8, 2013,  
10 to -- time-stamped 2:48.

11 Do you see that?

12 **A Yes.**

13 Q Okay. Mr. Jaramillo informs  
14 Mr. Smilansky that the Oglesby letter has been  
15 drafted and is being forwarded for clearance per  
16 Karen Finnegan and Pat Scholl from FOIA.

17 Do you agree with that statement?

18 Is that accurate?

19 **A It appears to say that, yes.**

20 Q Okay. Did you approve the Oglesby letter  
21 that was sent to CREW on May -- well, it was sent  
22 on May 10, 2013?

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1 **A I don't recall.**

2 Q Was it part of your normal process within  
3 your division for you to approve Oglesby letters  
4 that were sent to FOIA requestors?

5 **A No.**

6 Q Okay. Do you know why Karen Finnegan was  
7 involved in the process of approving this letter?

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

9 Q Was that part of the normal process  
10 within your division when responding to FOIA  
11 requestors and sending Oglesby letters, for  
12 Ms. Finnegan to approve such letters going out?

13 **A Not that I recall.**

14 Q Also, just at the bottom of that e-mail.  
15 Well, the -- the bottom e-mail, but the beginning,  
16 where Mr. Jaramillo says, "I'm the FOIA case  
17 manager for the FOIA request below."

18 Is that the same as the case analyst, I  
19 believe, you identified?

20 **A Yes.**

21 Q Okay. Thank you. Okay.

22 (Scholl Deposition Exhibit 9 marked for

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1 identification and is attached to the transcript.)  
2 Q Mr. Scholl, you've been handed what's  
3 been marked as Exhibit 9. It's a three-page  
4 document. And I want to make sure you have time  
5 to review it. Let me know once you're done  
6 reviewing it.  
7 A **Sure.**  
8 **Okay.**  
9 Q Same question again: Have you seen this  
10 document before?  
11 A **Not that I recall.**  
12 Q Okay.  
13 MS. COTCA: And, for the record, this is  
14 a three-page document. And at the top corner of  
15 the first page it says -- well, it's Document  
16 Number, State Document Number C06125574.  
17 Q Is that accurate?  
18 A **That's what it appears here.**  
19 Q Okay.  
20 A **Yes.**  
21 Q Thank you.  
22 Do you know what this document is?

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1 A **What do you mean what -- what is it?**  
2 Q What does it represent to be?  
3 A **It's -- appears to be case comments.**  
4 Q Can you explain what case -- are you  
5 familiar with case comments?  
6 A **Yes.**  
7 Q Okay. Let me just ask, is this case  
8 comments for the CREW request? And again, I just  
9 want to make sure we have the same FOIA Request  
10 Number --  
11 A **Yes, it appears to be.**  
12 Q Thank you.  
13 Okay. And can you explain what case  
14 comments is?  
15 A **At different levels, people will put**  
16 **comments into the system about the processing.**  
17 Q Of the particular FOIA request?  
18 A **Of the -- of the request, yes.**  
19 Q Okay. All right. And this is some form  
20 of database that the State Department has to --  
21 A **For tracking of cases.**  
22 Q Okay. Thank you.

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1 And if you can -- I just kind of want to  
2 walk through with some of these items with you.  
3 So if you can provide some explanation.  
4 In the headings, there's Comment Type,  
5 and there's the comment, which appears to be the  
6 information that was inputted into the system.  
7 And then the date. Is that the date that it was  
8 put into the system? Or what does the date  
9 reflect?  
10 A **It would appear to be the date it was**  
11 **entered into the system.**  
12 Q Okay. How about the Updated By, what  
13 does that reflect?  
14 A **It appears to be the person who -- who**  
15 **made the entry.**  
16 Q Okay. And when -- how are -- are these  
17 entries made in a timely fashion, contemporaneous  
18 with the actions that are being taken?  
19 MR. PEZZI: Objection. Foundation.  
20 A **Usually.**  
21 Q Okay. Is that something that would be  
22 discussed with your branch chiefs and the analysts

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1 who work under your branch chiefs, to make sure  
2 that information is inserted into the system in a  
3 timely manner, to make sure you have accurate  
4 information for the tracking?  
5 MR. PEZZI: Objection. Form.  
6 A **Would that be a subject of discussions**  
7 **with the branch chief and the analyst?**  
8 Q Yeah.  
9 A **It could possibly be, yes.**  
10 Q Okay. Is it part of the training that  
11 they receive?  
12 A **Yes.**  
13 Q Okay. Thank you.  
14 The second comment on the first page,  
15 where it says, "Tasker sent to SESCR & IRM with  
16 expedited priority."  
17 Do you see that?  
18 A **Yes.**  
19 Q Okay. And what is the date of that?  
20 A **12/26/12.**  
21 Q Okay. And who, according to this  
22 document, entered that?

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1 A J Aramillo.  
2 Q Was that Mr. Jaramillo?  
3 A I believe so, yes.  
4 Q Now, going back to the CREW request that  
5 initially was sent to the State Department.  
6 You testified earlier that it appears  
7 that the request was not made on an expedited  
8 basis.  
9 Why was the task to SESCO and IRM sent  
10 with expedited priority?  
11 MR. PEZZI: Objection. Form.  
12 Foundation.  
13 A I wouldn't be able to address that. It  
14 would normally say, This request meets the  
15 requirements for expeditious processing. I don't  
16 know. Expedited priority, I don't know what that  
17 means.  
18 Q Do you have any reason to believe that  
19 Mr. Jaramillo's insert in this comment line was  
20 incorrect, in that it wasn't sent with expedited  
21 priority?  
22 A I have no idea whether it's correct or

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1 not.  
2 Q Do you have any reason, sitting here  
3 today, to believe that it is incorrect?  
4 A I have no opinion either way.  
5 Q I'm asking if you have any reason to  
6 believe that it's incorrect.  
7 A I have no reason to believe it's  
8 incorrect.  
9 Q Do you know why Mr. Jaramillo would send  
10 it with expedited priority, when the requestor  
11 didn't request that?  
12 A I don't --  
13 MR. PEZZI: Objection. Form.  
14 A I don't know.  
15 Q Was that something that was typically  
16 done within your division?  
17 A I don't know. I don't remember.  
18 Q Was that part of normal practice within  
19 your division, for taskers to be sent with  
20 expedited priority when the requestors didn't ask  
21 for that?  
22 A I don't really know, because I've never

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1 seen this written and I've never seen this  
2 document. So I don't know if this was typical of  
3 what was taking place.  
4 Q Well, you oversaw Mr. Jaramillo, did you  
5 not?  
6 A Oversaw?  
7 Q Yes. He worked in your division, didn't  
8 he?  
9 A Yes. He worked for Terry Gordon.  
10 Q Okay. And Mr. Gordon worked for you.  
11 Correct?  
12 A Yes.  
13 Q Okay. And as the division chief, weren't  
14 you responsible for Terry Gordon and Mr. Jaramillo  
15 to make sure they do what they're supposed to do?  
16 A Yes.  
17 Q Okay. And as the division chief, weren't  
18 you aware of what the normal practice and  
19 procedures was within your division?  
20 A Yes.  
21 Q Okay. So my question is, then, was it  
22 normal practice within your division for a tasker

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1 to be sent with expedited priority when the  
2 requestor did not ask for the request to be  
3 expedited?  
4 A I don't know what "expedited priority"  
5 means.  
6 Q What do you think it means?  
7 A I'm not sure.  
8 Q You wouldn't -- you would disagree with  
9 me that that means that the search should be done  
10 on an expedited basis?  
11 A I don't disagree or agree either way. I  
12 just don't know what he meant by that.  
13 Q And you don't know -- but I'm asking you  
14 how do you interpret that here, sitting today?  
15 A I really have no opinion.  
16 Q Okay.  
17 Are you aware of any other FOIA requests  
18 from your division that were tasked out with  
19 expedited priority when the requestors didn't ask  
20 for that?  
21 A I don't remember. I don't know.  
22 Q Okay. I want to point you to the last



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1 comment on this sheet.  
2 **A First page?**  
3 Q First page, yes.  
4 Where it says, "Per P. Scholl, task sent  
5 to S/ES-IRM."  
6 Do you see that?  
7 **A Yes.**  
8 Q Okay. And P. Scholl, is that you,  
9 Mr. Scholl?  
10 **A It would appear to be.**  
11 Q Okay. And what's the date of that?  
12 **A 4/29/13.**  
13 Q Okay. Time-stamped 11:04 a.m. Correct?  
14 **A That's what it appears, yes.**  
15 Q Okay. Why did you ask Mr. Jaramillo to  
16 task S/ES-IRM?  
17 **A I don't recall.**  
18 Q Do you agree with me that, according to  
19 this document, you asked Mr. Jaramillo to task  
20 S/ES-IRM?  
21 **A That's what it appears on the document,**  
22 **yes.**

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1 Q Okay. Do you know who -- what office  
2 S/ES-IRM is?  
3 **A Did you ask me that before?**  
4 Q I did.  
5 **A Yeah. Not really.**  
6 Q Why would you task an office that you  
7 don't know?  
8 MR. PEZZI: Objection. Form.  
9 **A Don't recall.**  
10 Q If I were to tell you that S/ES-IRM  
11 handles the technology and information management  
12 for the Secretary's office, does that ring a bell?  
13 **A No.**  
14 Q Okay. How did you know to task the  
15 S/ES-IRM if you didn't know what it does?  
16 MR. PEZZI: Objection. Form.  
17 **A I don't -- I don't recall.**  
18 Q Did you have discussions with  
19 Ms. Finnegan, Ms. Walter, or John Hackett, or  
20 Ms. Grafeld, anybody within IPS, about tasking the  
21 CREW request to S/ES-IRM?  
22 **A I don't recall.**

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1 Q Who tasked the office of S/ES-IRM with  
2 the CREW request?  
3 **A Who tasked this?**  
4 Q Yes.  
5 **A To S/ES-IRM? I would think**  
6 **Mr. Jaramillo.**  
7 Q And how would that be tasked?  
8 **A In paper form.**  
9 Q Okay.  
10 **A I believe. It might have been**  
11 **electronic, but I think paper form back then.**  
12 Q Okay. And what do you mean by  
13 "electronic"? Via database?  
14 **A Scan it.**  
15 Q Okay.  
16 **A And send it to them as a PDF.**  
17 Q Okay. But there was -- there's a form --  
18 **A Yeah.**  
19 Q -- that would have been submitted?  
20 **A Yes.**  
21 Q Okay. Who was the contact at S/ES-IRM  
22 who Mr. Jaramillo would have been in touch with

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1 with respect to the tasking at this request?  
2 MR. PEZZI: Objection. Form.  
3 Foundation.  
4 **A I don't recall. Don't -- I don't know.**  
5 Q Who would know?  
6 **A I would -- don't know.**  
7 Q Okay. I want to point you to the second  
8 page.  
9 First comment on the second page of this  
10 exhibit, where it says, "S/ES-IRM reports zero  
11 docs found."  
12 Do you see that?  
13 **A Yes, I do.**  
14 Q Okay. And when was that entered?  
15 **A It appears to have been entered 5/8/13.**  
16 Q Okay. And who was that entered by?  
17 **A It appears to be Mr. Jaramillo.**  
18 Q Okay. Let me ask you, why was an Oglesby  
19 letter drafted in the CREW request before S/ES-IRM  
20 responded with a search results?  
21 MR. PEZZI: Objection. Form.  
22 Foundation.

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1 **A I don't know.**  
2 Q You agree with me that an Oglesby letter  
3 was drafted in the CREW request on May 1.  
4 MR. PEZZI: Same objections.  
5 Q Do you agree with that?  
6 **A I don't know if I agree with that.**  
7 **Where is that?**  
8 Q Okay. Why don't you take a look at the  
9 first page of Exhibit 7 that we just went through.  
10 MR. PEZZI: This is Exhibit 7?  
11 MS. COTCA: No.  
12 MR. PEZZI: Mine are not numbered.  
13 MS. COTCA: I believe it's Exhibit 7.  
14 MR. PEZZI: Okay.  
15 MS. COTCA: May I see it?  
16 MR. PEZZI: This was Exhibit 7?  
17 MS. COTCA: Yes.  
18 **A So repeat your question, if you would,**  
19 **please?**  
20 Q You agree with me that an Oglesby letter  
21 was drafted and -- or in the process of being  
22 prepared, in response to the CREW request, as of

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1 May 1, 2013.  
2 Do you agree with me?  
3 **A That's what it says here, yes.**  
4 Q Okay. Do you have any reason to doubt  
5 it?  
6 **A No.**  
7 Q Okay. So my question is, why would an  
8 Oglesby letter be in the process of being drafted  
9 before search results were provided by the Office  
10 of S/ES-IRM to IPS in response to the CREW  
11 request?  
12 MR. PEZZI: Objection. Form.  
13 Foundation.  
14 **A I don't know.**  
15 Q Do you agree with me that it would be  
16 premature to draft such a letter when all the  
17 searches have not been completed?  
18 **A I can't agree with you either way.**  
19 Q I believe your testimony earlier this  
20 morning was that Oglesby letters are drafted after  
21 all the searches have been completed.  
22 Is that accurate?

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1 **A That's accurate, yes.**  
2 Q Okay. So then would you agree with me  
3 that it was premature for your office to be in the  
4 process of drafting an Oglesby letter in response  
5 to the CREW request before the office of S/ES-IRM  
6 completed its search?  
7 MR. PEZZI: Objection. Form.  
8 Foundation.  
9 **A I don't know. Because I would think this**  
10 **is a draft. It hasn't gone out. So it could be**  
11 **draft that hasn't gone anywhere.**  
12 Q Yes. But my question is, it's in the  
13 process of being prepared.  
14 **A Yes.**  
15 Q Why would your office be in the process  
16 of preparing an Oglesby letter before receiving  
17 the search results?  
18 MR. PEZZI: Same objections.  
19 **A I don't know.**  
20 Q Wouldn't that be premature?  
21 MR. PEZZI: Same objections.  
22 **A I can't -- I can't say whether it was**

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1 **premature or not. I can't say I agree with you.**  
2 Q Well, it contradicts your testimony from  
3 this morning.  
4 MR. PEZZI: Objection. Form. And I'd  
5 ask that you ask questions of the witness rather  
6 than trying to characterize his testimony in  
7 statements.  
8 Q Do you not agree that it contradicts your  
9 testimony from this morning?  
10 **A I'm not sure if it contradicts my**  
11 **testimony for this morning because I don't**  
12 **remember the question you asked me that I had to**  
13 **respond to that provided you with this**  
14 **information.**  
15 Q Your testimony this morning is that  
16 Oglesby letters would not be drafted prior to all  
17 the searches being completed.  
18 Do you remember that?  
19 MR. PEZZI: Objection. Form.  
20 **A I don't remember that characterization**  
21 **exactly. Formation -- or the drafting of an**  
22 **Oglesby letter is a process. So if there are**

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1 **additional searches that needed to go out, they**  
2 **would go out before the Oglesby was sent out to**  
3 **the requestor.**  
4 Q Why would your division work on something  
5 that may not be used in the long run? If S/ES-IRM  
6 would have found responsive records, would you  
7 have sent an Oglesby letter?  
8 MR. PEZZI: Objection. Form.  
9 **A I can't recall.**  
10 Q Does the State Department send Oglesby  
11 letters when responsive records are located in  
12 response to a FOIA request?  
13 **A This is -- does the department send**  
14 **Oglesby letters out to requestors in response to**  
15 **requests to provide the results of the search in**  
16 **the -- in searches where there are no records?**  
17 Q Right.  
18 **A Yes, we do that.**  
19 Q So as of May 1, 2013, you agree with me  
20 that there was a search pending from S/ES-IRM.  
21 Correct?  
22 MR. PEZZI: Objection. Form.

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1 **A Is there? Was there?**  
2 Q Well, according to the first page of this  
3 exhibit, it was tasked on April 29, 2013.  
4 Do you see that?  
5 **A First page of which?**  
6 Q Exhibit 9.  
7 **A Yes, it was sent.**  
8 Q Okay. So you agree with me that a search  
9 was pending from S/ES-IRM.  
10 **A At which time?**  
11 Q May 1st, 2013?  
12 **A It would appear so.**  
13 Q Okay. Thank you.  
14 Sitting here today, have you tasked or  
15 have you been aware of any FOIA requests tasked to  
16 S/ES-IRM?  
17 **A Any requests tasked --**  
18 Q Any requests.  
19 **A -- to S/ES-IRM?**  
20 Q Yes. Yes.  
21 **A Now?**  
22 Q Yes.

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1 **A Today?**  
2 Q Sitting here today, do you have memory of  
3 any particular request that had been tasked to  
4 S/ES-IRM?  
5 **A No.**  
6 Q And do you know -- and I'm not asking for  
7 a particular name, but perhaps position or where  
8 in the chain within S/ES-IRM who would have  
9 received a task from your division?  
10 MR. PEZZI: Objection. Form.  
11 Q And this is back in 2013.  
12 MR. PEZZI: Objection. Form.  
13 Foundation.  
14 **A I don't know.**  
15 Q We can move on.  
16 (Scholl Deposition Exhibit 10 marked for  
17 identification and is attached to the transcript.)  
18 **A Okay.**  
19 Q Okay. Thank you.  
20 Actually, Mr. Scholl, before we move on,  
21 I just want to ask with respect to Exhibit 9, the  
22 Case Comments, is that something that's created

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1 for all FOIA requests that come into the State  
2 Department?  
3 **A I believe so.**  
4 Q Okay.  
5 **A Should be.**  
6 Q Yes. Okay. Thank you.  
7 MS. COTCA: Exhibit 10, for the record,  
8 is a compilation of -- well, it looks to be four  
9 documents. The first one, State Department  
10 Document Number 0612556, appearing on the first  
11 page --  
12 **A Yes.**  
13 Q -- of the exhibit?  
14 **A Yes.**  
15 Q And then the second document is the third  
16 page, actually, of the exhibit, C06125555.  
17 Do you agree with that?  
18 **A Yes.**  
19 Q Okay. And then the fourth page being the  
20 third document, C06125553?  
21 **A Yes.**  
22 Q Okay. And then the last document,

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1 appearing on the fifth page, is C06125561.  
2 **A Yes.**  
3 Q Okay. Thank you. I'm just going to  
4 refer to this as one exhibit. I'll try not to say  
5 one document so we don't get confused.  
6 Have you seen or -- these documents  
7 marked as Exhibit 10 prior to today?  
8 MR. PEZZI: Outside the context of any  
9 meetings with government attorneys.  
10 **A I've never seen this.**  
11 Q Okay.  
12 **A That I can recall.**  
13 Q Okay. Do you recognize what the first  
14 document appearing as part of Exhibit 10 is?  
15 **A It appears to be a search tasker.**  
16 Q Okay. Can you explain to me what that  
17 is?  
18 Are you familiar with search taskers?  
19 **A Yes.**  
20 Q Okay. Can you explain to me what that  
21 is.  
22 **A A search tasker is a manner in which we**

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1 **would task a search -- search systems for records.**  
2 Q Okay. And I think earlier you mentioned  
3 that Mr. Jaramillo would have sent the task  
4 through a form to S/ES-IRM.  
5 **A Correct.**  
6 Q Is this the type of form that you were  
7 referring to?  
8 **A Yes.**  
9 Q Okay. And is this a form that comes from  
10 your division?  
11 **A It's used -- it was used by our -- my**  
12 **division, yes.**  
13 Q Okay. And what's the purpose of the  
14 form?  
15 **A It's to go to offices that we feel might**  
16 **have documents and provide them with a copy of the**  
17 **letter and request that they conduct a search,**  
18 **provide us information, return a response to us.**  
19 Q Okay. And just to make sure we're still  
20 talking about the CREW request, you agree with me  
21 that this is the same case number, F-2012-40981?  
22 **A Yes.**

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1 Q Okay. And is it search -- so walk me  
2 through this a little bit.  
3 Is this tasker sent to each particular  
4 office that is being tasked with a search in  
5 response to the FOIA request?  
6 **A Yes, generally.**  
7 Q Okay. So in the line where it says,  
8 "Office tasked with search" on this particular  
9 tasker, that -- was that S/ES-CR?  
10 **A Yes.**  
11 Q Okay. And that's the correspondence and  
12 records office for the Secretary's office?  
13 **A I believe so.**  
14 Q Okay. And when was this task sent?  
15 **A The document indicates it was tasked on**  
16 **12/21/12.**  
17 Q Okay. And how was this sent to S/ES-CR  
18 at the time?  
19 **A I don't recall exactly. It would have**  
20 **gone interoffice mail, or office mail.**  
21 Q Okay. Okay. But it's fair to say it  
22 either would have gone interoffice mail in hard

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1 copy or scanned in --  
2 **A Yes.**  
3 Q -- as an attachment via e-mail.  
4 **A Correct.**  
5 Q Okay.  
6 And then on the second page, you see  
7 Jonathon Wasser.  
8 Do you see that?  
9 **A Yes, I do.**  
10 Q Okay. Are you familiar with Mr. Wasser?  
11 **A I know who he is.**  
12 Q Who is he?  
13 **A He works -- I believe he works for**  
14 **Clarence Finney.**  
15 Q Okay. So is this Mr. Wasser's response  
16 to the original task that was sent?  
17 **A It appears to be.**  
18 Q Okay. And what does the search time on  
19 the same line where his name appears indicate?  
20 What does that represent?  
21 **A It looks like one hour.**  
22 Q For the search for records in response to

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1 this request?  
2 **A Yes.**  
3 Q Okay. And then does this -- well, that's  
4 fine.  
5 And when did he return this to your  
6 division?  
7 **A I don't know when he returned it, but he**  
8 **dated it the 14th of February, 2013.**  
9 Q Okay. Okay. And the second document  
10 appearing in this exhibit.  
11 **A Uh-huh.**  
12 Q Which is actually the third page of the  
13 exhibit. Is a memorandum from Mr. Finney to  
14 Mr. Wasser, with a copy to Mr. Jaramillo.  
15 Do you see that?  
16 MR. PEZZI: Objection. Form.  
17 **A Do I see that? Yes, I see that's what it**  
18 **says.**  
19 Q Okay.  
20 MS. COTCA: Did I misstate?  
21 MR. PEZZI: I think you swapped  
22 Mr. Wasser and Mr. Finney, but ...

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1 MS. COTCA: Oh, I'm sorry.  
2 MR. PEZZI: But we all have the document,  
3 so ...  
4 Q Okay. All right. It's a memorandum from  
5 Mr. Wasser to Mr. Finney. I apologize.  
6 **A From Jonathon Wasser, S/ES-CR, to**  
7 **Clarence Finney, Director --**  
8 Q Yes. Okay.  
9 **A -- S/ES-CR.**  
10 Q Thank you.  
11 And then do you normally receive these  
12 memorandums with the search tasker when they're  
13 returned to your office after the search is  
14 completed?  
15 **A Do I?**  
16 Q Not you; your division.  
17 **A The analyst would -- it depends on the**  
18 **bureau. It depends on the office. Sometimes the**  
19 **bureaus include additional information, in**  
20 **addition to the response on the tasker.**  
21 Q Okay. And how about the third document,  
22 which is the fourth page? Now, that is a

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1 memorandum from Mr. Finney to Mr. Jaramillo. Is  
2 that something that was normally received when  
3 the -- Mr. Finney's office was tasked during this  
4 time frame?  
5 **A I don't know.**  
6 Q Okay. All right. Let's move on to the  
7 next one.  
8 I'm going to hand you what's marked as  
9 Exhibit 11 in just a second.  
10 (Scholl Deposition Exhibit 11 marked for  
11 identification and is attached to the transcript.)  
12 **A Okay.**  
13 Q Okay.  
14 MS. COTCA: And, for the record, this is  
15 State Department Document Number C06125562.  
16 Q Do you see that on the top corner?  
17 **A Yes.**  
18 Q Okay. And what is this document?  
19 **A It's a search tasker requesting that IRM**  
20 **search their records in response to the numbered**  
21 **request, the case number.**  
22 Q Okay. That's the CREW request we've been

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1 talking about today. Right?  
2 **A Right. Correct.**  
3 Q Okay.  
4 **A I don't know what's attached, but it**  
5 **references a number. Usually it would accompany a**  
6 **copy of the requestor's letter.**  
7 Q Okay. Right. This is just the search  
8 tasker form. Correct?  
9 **A Yes.**  
10 Q Okay.  
11 **A This is a transmittal.**  
12 Q Okay. Thank you.  
13 And when was this tasker sent out?  
14 **A The document indicates it was sent out**  
15 **12/13/2012.**  
16 Q Okay. And when did IRM respond?  
17 **A I don't know.**  
18 Q Okay. In your experience as the division  
19 chief, and again around the same time frame, late  
20 2012, two thousand -- early 2013, to mid 2013,  
21 would IRM, as part of their response to search  
22 taskers, provide any additional documentation with

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1 respect to the search they conducted?  
2 MR. PEZZI: Objection. Form.  
3 **A They may or may not. I didn't know**  
4 **typically what they did.**  
5 Q If you know.  
6 **A No, I don't know.**  
7 Q Okay. But, I mean, providing back to  
8 your division.  
9 **A Yes, if they had something to include,**  
10 **they would.**  
11 Q Okay.  
12 **A Outside of this.**  
13 Q I -- I guess I'm asking for the normal  
14 process.  
15 If no records were located by IRM, if you  
16 know, during this time frame did IRM include any  
17 additional documentation as S/ES-CR did in  
18 response to a search -- search tasker?  
19 **A I don't know.**  
20 Q Okay.  
21 (Scholl Deposition Exhibit 12 marked for  
22 identification and is attached to the transcript.)

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1 Q Mr. Scholl, if you can look what's been  
2 marked as Exhibit 12, which is a two-page e-mail  
3 chain, bearing Document Number C06125565 at the  
4 top corner.  
5 **A Yes.**  
6 Q Have you had a chance to look at it?  
7 **A Yes.**  
8 Q Okay. You agree with me it appears to be  
9 an e-mail from Mr. Jaramillo to a Renate Benham,  
10 in regards to IRM's search results for the CREW --  
11 the CREW request we've been talking about?  
12 **A It appears so.**  
13 Q Okay. And what's the date of the -- of  
14 the completed search results from IRM?  
15 **A I'm sorry?**  
16 Q Let me rephrase.  
17 What's the date of the e-mail when  
18 Ms. Benham informed Mr. Jaramillo that IRM did not  
19 locate any responsive records?  
20 **A Ms. Benham indicates here that they**  
21 **provided an answer on January 18th of 2013.**  
22 Q Okay. Do you know Bryan Pagliano?

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1 **A No.**  
2 Q Does the name sound -- ring a bell?  
3 **A No.**  
4 Q Okay. I just want to make sure I have  
5 this correct. I believe your testimony is that a  
6 search tasker should have also been sent to  
7 S/ES-IRM, according to the comment, the case  
8 comments that we reviewed earlier. Correct?  
9 **A I'm not sure I understand your question.**  
10 Q Do you know if a search tasker was sent  
11 to S/ES-IRM?  
12 **A Do I know if?**  
13 Q Yes.  
14 **A I think there's one -- the one that**  
15 **you're holding?**  
16 Q No. This is S/ES-CR.  
17 **A S/ES-CR?**  
18 Q Yes. I'm asking about the search tasker  
19 that was sent to S/ES-IRM.  
20 **A And you're asking?**  
21 Q Have you ever seen it before?  
22 **A I've never seen it before.**

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1 Q Has your office ever been asked to search  
2 for records relating to CREW -- for records  
3 relating to the CREW request?  
4 **A I don't recall.**  
5 Q Have you ever been asked to search your  
6 records relating to the CREW request we've been  
7 talking about here today?  
8 **A I don't recall ever.**  
9 Q You don't recall ever being asked to  
10 search for your own records.  
11 **A Yes.**  
12 Q Okay. Sorry. Bear with me for a moment.  
13 **A Sure.**  
14 Q Thank you.  
15 Actually, before we move on to the next  
16 exhibit. Again I want to ask you if reviewing any  
17 of these documents relating to the CREW request  
18 pertaining to Secretary Clinton's e-mails, if they  
19 refreshed your recollection in any way about the  
20 subject.  
21 **A No.**  
22 (Scholl Deposition Exhibit 13 marked for

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1 identification and is attached to the transcript.)  
2 Q Mr. Scholl, you -- you've been handed  
3 what's been marked as Exhibit 13, which was  
4 previously marked as Walter Exhibit 6, and is a --  
5 is the State Department's Document Number  
6 Bates-stamped 902 that was produced to Judicial  
7 Watch in discovery of this case.  
8 **A Yes.**  
9 Q Okay. Have you had a chance to look  
10 through it?  
11 **A No.**  
12 Q Okay. Please do.  
13 **A Okay.**  
14 Q Okay. Thank you.  
15 Have you seen this document before?  
16 MR. PEZZI: Outside the context of  
17 meeting with government attorneys.  
18 **A No.**  
19 Q I want to point you to the  
20 second-to-the-last page of this exhibit, on Page  
21 4. Which is an e-mail continuing from the bottom  
22 of Page 3 from Ms. Grafeld to Sheryl Walter and

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1 John Hackett, asking for copies of FOIA requests  
2 pertaining to Secretary Clinton's e-mails.  
3 Do you see that?  
4 **A Yes.**  
5 Q Okay. And do you agree that you were  
6 forwarded that e-mail that same day at 10:51 a.m.?  
7 **A Yes.**  
8 Q Okay. Do you recall why Ms. Grafeld on  
9 August 7, 2013, requested copies of all requests  
10 related to Secretary Clinton's e-mails?  
11 **A No.**  
12 Q Okay. Who is Jeff Hermesman?  
13 Was he one of your branch chiefs?  
14 **A Yes.**  
15 Q Okay. And which branch?  
16 **A The WEP branch. Western Hemisphere, East  
17 Asia Pacific.**  
18 Q Okay. Now, do you recall receiving this  
19 e-mail?  
20 **A I don't recall, no.**  
21 Q Is this something that you would have  
22 paid attention to back in August of 2013?

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1 **A Yes.**  
2 Q Okay. And is this something that you  
3 would have discussed with Mr. Hermesman back in  
4 August of 2013?  
5 MR. PEZZI: Objection to form.  
6 **A Would I have discussed this with him?  
7 Perhaps. Don't know.**  
8 Q How about with Ms. Walter?  
9 MR. PEZZI: Same objection.  
10 **A Perhaps.**  
11 Q Do you recall any other time that  
12 Ms. Walter requested copies of all FOIA requests  
13 pertaining to Secretary Clinton's e-mails?  
14 **A No, I don't.**  
15 Q Okay. Based on the fact that you were  
16 included in this e-mail and Ms. Walter's request  
17 was sent to your subordinate, Mr. Hermesman, is  
18 this something that you would have followed to  
19 make sure that Ms. Walter's request is responded  
20 to and to follow the subject matter of this?  
21 MR. PEZZI: Objection. Form.  
22 **A I don't -- again, I don't know what you**

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1 **mean by "followed."**  
2 Q Follow with respect to the status of  
3 Ms. Walter's request to make sure that Ms. Walter  
4 received a response to her request.  
5 MR. PEZZI: Same objection.  
6 **A I would typically, as a general rule,  
7 would follow up, as you put it. In this  
8 particular case whether I did or not I don't know.  
9 I don't remember.**  
10 Q Did you have any discussions with anybody  
11 regarding Ms. Walter's request for a list of all  
12 FOIA requests relating to Secretary Clinton's  
13 e-mails within IPS in 2013 and 2014?  
14 **A Not that I recall.**  
15 Q How about ever? And I'm asking outside  
16 any conversations you had with your attorneys.  
17 **A I don't recall.**  
18 (Scholl Deposition Exhibit 14 marked for  
19 identification and is attached to the transcript.)  
20 Q Mr. Scholl, you've been handed what's  
21 been marked as Exhibit 14. It's a two-page  
22 document that was produced in discovery of this

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1 case by the State Department to Judicial Watch.  
2 Give you a chance to look at it.  
3 **A Okay. Yes.**  
4 Q Okay. Have you had a chance to look at  
5 it?  
6 **A Yes, I have.**  
7 Q Thank you.  
8 Have you seen this document before?  
9 MR. PEZZI: Outside the context of  
10 conversations with government attorneys.  
11 MS. COTCA: And, Steve, just to make  
12 sure, in preparation for today's deposition.  
13 Right?  
14 MR. PEZZI: I'm not sure I understand the  
15 question. Or why you're asking me the question.  
16 MS. COTCA: Well, outside of the context  
17 of discussions with attorneys is a pretty general  
18 objection, I mean. There's -- it doesn't  
19 necessarily mean it's attorney-client privilege.  
20 If you're objecting to it with respect to this  
21 case, then I understand.  
22 MR. PEZZI: I'm asking him to limit his

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1 answer to the context of anything but  
2 conversations with government attorneys.  
3 **A I have never seen this before.**  
4 Q Okay.  
5 Are you familiar with a FOIA request that  
6 was sent to the State Department in 2013 in  
7 regards to WikiLeaks?  
8 **A No.**  
9 Q Okay. Does that ring a bell at all?  
10 **A No.**  
11 Q Okay. Are you familiar with a FOIA  
12 request that the State Department received in 2013  
13 from Gawker regarding communications between  
14 Secretary Clinton's e-mails -- or Secretary  
15 Clinton and Sidney Blumenthal?  
16 **A No, I don't recall.**  
17 Q Does that request sound -- or ring a bell  
18 in any way?  
19 **A Not really.**  
20 Q What do you mean by "not really"?  
21 **A No, it doesn't.**  
22 Q Okay. Do you recall reviewing any e-mail

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1 communications in connection with any FOIA  
2 requests that were received by the State  
3 Department in the time frame of late 2013, early  
4 2014, in which Secretary Clinton's e-mail use was  
5 discussed?  
6 **A So the question was? Have I seen them?**  
7 **Have I -- am I familiar? Do I -- am I aware of**  
8 **them?**  
9 Q Did you review -- did you -- do you  
10 recall reviewing any e-mails back in late 2014 --  
11 2013, excuse me, early 2014, that discuss  
12 Secretary Clinton's e-mail?  
13 **A No.**  
14 Q Okay.  
15 MS. COTCA: Can we go off the record?  
16 VIDEO SPECIALIST: We are going off the  
17 record at 14:54.  
18 (A recess was taken.)  
19 VIDEO SPECIALIST: We are back on the  
20 record at 15:19.  
21 BY MS. COTCA:  
22 Q Mr. Scholl, just a few followup

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1 questions.  
2 In regards to the CREW request from 2012  
3 that we've been talking about today, how did  
4 S/ES-IRM inform your office that it located no  
5 records?  
6 MR. PEZZI: Objection. Foundation.  
7 **A Well, it -- it appears that it would have**  
8 **come back as a response to the transmittal that**  
9 **was sent.**  
10 Q And you're assuming the transmittal that  
11 was sent, the search tasker form?  
12 **A Yes.**  
13 Q Okay. Do you know if in fact a search  
14 tasker was sent to S/ES-IRM?  
15 **A For this case?**  
16 Q For the CREW request.  
17 **A I think is that the one -- one of the**  
18 **ones you showed me?**  
19 Q The two I showed you are for S/ES-CR and  
20 IRM.  
21 **A Right. So you're asking about?**  
22 Q A search tasker -- now, I'll represent to



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1 you the case in which those documents were  
2 produced related to the processing of those  
3 requests from CREW.  
4 **A Okay.**  
5 Q And the only search task forms that were  
6 produced in that case are from S/ES-CR and IRM.  
7 So I'm asking if you in fact know whether  
8 a search tasker was actually sent to S/ES-IRM.  
9 **A I don't know.**  
10 Q Who would know that?  
11 **A I don't know.**  
12 Q Is Mr. Jaramillo still in your division?  
13 **A He is, yes, still works in my division.**  
14 Q What is his position?  
15 **A I believe he's a team leader. The**  
16 **organization is being -- we're being reorganized**  
17 **so we're in a state of flux at this time. So he**  
18 **was a team leader.**  
19 Q Is he still within the same branch?  
20 **A I'm not sure.**  
21 Q Do you still have the same branches that  
22 you had back in 2013 within your division?

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1 **A Yes; but they don't report to me anymore.**  
2 Q Does Mr. Jaramillo still report to you?  
3 **A No. He reported to -- at one time to**  
4 **Terry Gordon, and then to I believe Jeanie Miller,**  
5 **who took over the branch from Mr. Gordon.**  
6 Q Okay. So does he still report to  
7 Ms. Miller?  
8 **A I don't know.**  
9 Q Okay. But he's still an employee at the  
10 State Department?  
11 **A Yes.**  
12 Q Okay. Would Mr. Jaramillo know whether  
13 he sent a search tasker form as indicated in the  
14 comment sheet for the CREW request?  
15 MR. PEZZI: Objection. Form.  
16 **A Would he know whether he sent a -- a**  
17 **tasker?**  
18 Q Correct. As indicated in the comment  
19 sheet for the CREW request.  
20 **A I don't know.**  
21 Q Do you know who his point of contact was  
22 at S/ES-IRM?

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1 MR. PEZZI: Same objection.  
2 **A I don't know. I would think it's -- in**  
3 **IRM, I don't know. I don't know who the person,**  
4 **the contact, was.**  
5 Q Do you know the official title or  
6 positions as to who may have been his point of  
7 contact?  
8 **A No, I don't.**  
9 Q Okay. Is it reasonable to say that  
10 Mr. Jaramillo may be a person who would have that  
11 information?  
12 **A It would be reasonable.**  
13 Q Okay. Did your division handle FOIA  
14 requests that were also, once they were -- they  
15 entered litigation, did they continue to be  
16 handled by your division?  
17 **A No.**  
18 Q Okay. Can you walk me through the  
19 process of what happened to the FOIA requests once  
20 they entered litigation phase?  
21 **A I'm not sure of the specifics of how it**  
22 **was done. But basically the litigation staff**

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1 **takes over the processing of the requests.**  
2 Q Okay. And if you don't mind looking at  
3 Exhibit 1.  
4 Can you identify the litigation staff  
5 that you just referred to who would start handling  
6 the FOIA requests in litigation?  
7 **A I believe it would be the litigation and**  
8 **appeals branch.**  
9 Q Okay. And that's under, in the division  
10 for Karen Finnegan back in 2013. Right?  
11 **A I believe so, yes.**  
12 Q Okay. Did Ms. Finnegan's division handle  
13 any FOIA requests that were not in litigation --  
14 **A I don't --**  
15 Q -- or was that -- I'm sorry. Let me --  
16 go ahead and answer.  
17 **A I don't know.**  
18 Q Okay. The process that I understood is,  
19 the FOIA requests, once they went to the requestor  
20 liaison's office -- liaison division, they would  
21 be sent over to your division for processing?  
22 **A In most cases, yes.**

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1 Q Okay. I believe you testified that you  
2 started in the FOIA office at the State Department  
3 back in 1988, or around that time?  
4 A **Around that time.**  
5 Q Okay. Have you -- and from 1988 to  
6 today, have you received FOIA training while you  
7 have been at the State Department?  
8 A **Yes.**  
9 Q Okay. When did you first start begin --  
10 start receiving FOIA training at the State  
11 Department?  
12 MR. PEZZI: Objection. Scope.  
13 A **The first day I started in the office.**  
14 Q Okay. And did you continue to receive  
15 that training in -- as you moved into the various  
16 positions that you were in within IPS?  
17 A **Yes.**  
18 MR. PEZZI: Same objection.  
19 Q And did the FOIA training include  
20 information to make sure that you were aware of  
21 legal obligations under FOIA to ensure that the  
22 department complied with FOIA?

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1 A **I don't remember specifically, but I'm**  
2 **sure that was included at one point.**  
3 Q At one point, or --  
4 A **Or at many points.**  
5 Q Okay. How often have you received this  
6 type of training, the FOIA training?  
7 A **What type of training, though? There's**  
8 **administrative processing, there's -- there's on**  
9 **exemptions. Would have been at least once or**  
10 **twice a year.**  
11 Q And that's been since your entire career,  
12 since 1988 to the present?  
13 A **For the most part, yes.**  
14 Q Okay. Are you aware that an S/ES-IRM  
15 official testified in this case that S/ES-IRM was  
16 made aware Secretary Clinton's Clintonemail.com  
17 account as soon as she came to the State  
18 Department or shortly after she came to the State  
19 Department?  
20 A **Was I aware that someone -- I'm sure --**  
21 **I'm not sure I understand your question.**  
22 Q Are you aware of the testimony given in

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1 this case by an S/ES-IRM official that the office,  
2 the S/ES-IRM office, was made aware of Secretary  
3 Clinton's e-mail account shortly after she started  
4 at the State Department in 2009?  
5 A **No.**  
6 Q Does that surprise you?  
7 A **Does it surprise me or -- no.**  
8 Q Well, in light of --  
9 A **I have no opinion.**  
10 Q In light of the CREW request that we've  
11 talked about quite at length today pertaining to  
12 Secretary Clinton's e-mail accounts, does it  
13 surprise you that S/ES-IRM was tasked with  
14 searching for responsive records, and yet,  
15 according to the Case Comments sheet, said that  
16 they provided a no-records response?  
17 MR. PEZZI: Objection. Form.  
18 A **I don't understand what you mean by "a**  
19 **surprise."**  
20 Q Well, does that raise any concerns for  
21 you that they were -- that S/ES-IRM knew about  
22 Secretary Clinton's e-mail account in 2009, and

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1 yet in May of 2013 it informed your office that it  
2 didn't have any records with respect to Secretary  
3 Clinton's e-mail account?  
4 MR. PEZZI: Objection. Form.  
5 Foundation.  
6 A **I really -- I really have no opinion**  
7 **either way.**  
8 Q Well, didn't that response go from your  
9 division?  
10 A **When?**  
11 Q In 2013, in May of 2013. We're speaking  
12 specifically to the CREW request.  
13 A **You're talking about the tasker that we**  
14 **sent, and you're surprised that they came back**  
15 **with no records? Am I surprised that they came**  
16 **back with no records?**  
17 Q That's not the question.  
18 The -- the question is, are you surprised  
19 they came back with no records, even though  
20 S/ES-IRM knew about Secretary Clinton's e-mail as  
21 early as 2009?  
22 MR. PEZZI: Objection. Form.

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1 Foundation.

2 **A I'm not surprised, no.**

3 Q Why not?

4 MR. PEZZI: Same objections.

5 **A I just don't -- it's not an issue that**

6 **I'm surprised by one way or another.**

7 Q Do you -- I'm sorry.

8 Do you expect that the bureau's

9 responding to the search taskers that were sent

10 out from your division, that those responses are

11 accurate and true?

12 **A Do I expect them to be accurate and true?**

13 **Yes.**

14 Q Okay. Do you agree that is the

15 S/ES-IRM's response was not accurate and true in

16 informing your office, your division, that there

17 were no responsive records?

18 MR. PEZZI: Objection. Form.

19 Foundation.

20 **A I -- you're asking me for my opinion?**

21 Q No. I'm asking you as a matter of fact.

22 There's testimony in this case that as early as

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1 2009 S/ES-IRM knew about Secretary Clinton's

2 e-mail account. According to the documents in

3 this case that we've talked about, S/ES-IRM

4 informed your division that there were no records

5 relating to Secretary Clinton's e-mail account in

6 responding to the CREW request in 2013.

7 Does it concern you that their response

8 was inaccurate?

9 MR. PEZZI: Objection. Form.

10 Foundation. And I would ask you to keep your

11 questions to matters within the witness'

12 knowledge. This is not an opportunity for you to

13 be testifying. The witness is here to answer your

14 questions.

15 MS. COTCA: Well, I disagree with your

16 characterization.

17 Q But, go ahead.

18 **A I guess we depend on the bureaus to do a**

19 **thorough search and provide us with their**

20 **responses.**

21 Q Right. And as the division, and having

22 worked with FOIA for over 20-plus years, is it

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1 your expectation and understanding that the State

2 Department must conduct, must -- is obligated

3 under FOIA to respond accurately in responding to

4 a requestor?

5 **A Yes.**

6 Q Did you discuss your deposition today

7 with anybody else outside of your attorneys?

8 **A No.**

9 Q Okay. Have you been in contact with

10 Mr. Hackett since he left the State Department?

11 **A I ran into him at Tysons Corner.**

12 Q Did you discuss anything relating to --

13 **A No.**

14 Q -- Secretary Clinton's e-mails or --

15 **A Definitely not.**

16 Q -- anything about this case?

17 **A We just talked about his new job.**

18 Q Okay. How about with Ms. Walter?

19 **A No.**

20 Q Okay. Did you -- have you had any role

21 in the processing of Judicial Watch's FOIA request

22 in this case?

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1 **A Role as -- as a division chief, over --**

2 **with oversight over the -- or managing the three**

3 **branches.**

4 Q Okay.

5 **A That's my role.**

6 Q Okay. Any direct involvement in

7 processing this FOIA request?

8 **A Not that I recall.**

9 Q Okay.

10 (Scholl Deposition Exhibit 15 marked for

11 identification and is attached to the transcript.)

12 Q Mr. Scholl, you've been handed what's

13 been marked as Exhibit 15. And I'll represent to

14 you these are responses the State Department has

15 produced to Judicial Watch in this -- in the

16 discovery of this case to plaintiff's supplemental

17 request for production of documents.

18 **A What does that mean, I mean?**

19 Q Judicial Watch sent supplemental requests

20 for documents, and this is the State Department's

21 written response. Okay?

22 **A In litigation?**

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1 Q In this, in the discovery in this  
2 litigation.  
3 **A Right.**  
4 Q Yes. Correct.  
5 And do you agree with me that the date on  
6 this document appearing on Page 10 is September  
7 12, 2019?  
8 **A That's what it appears.**  
9 Q Okay. Thank you.  
10 I just want to point you to one request,  
11 one particular request in which your name is  
12 referenced. And that is on Page 8, Supplemental  
13 Request For Production 2.  
14 Have you seen this document before?  
15 **A No.**  
16 Q Okay. Have -- I want to give you an  
17 opportunity to read the request. Let me know once  
18 you've had a chance.  
19 **A This portion here?**  
20 Q Yes.  
21 MR. PEZZI: And the response continues  
22 onto the top of Page 9.

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1 THE WITNESS: Okay.  
2 MS. COTCA: I'm just asking for the --  
3 I'm focusing on the request.  
4 Q Okay. Have you had a chance to review  
5 the request?  
6 **A Not yet.**  
7 Q I'm only asking you to focus on the  
8 Supplemental Request for Production 2.  
9 MR. PEZZI: Well, he can --  
10 Q Appearing on Page 8.  
11 MR. PEZZI: And he can read the response  
12 to the request, if he'd like to understand the  
13 context of the document you put in front of him, I  
14 mean --  
15 MS. COTCA: I'm not asking about further  
16 context. If you want to ask any questions about  
17 any other portion of the document, feel free to do  
18 so, Steve. But --  
19 MR. PEZZI: Are you -- are you objecting  
20 to allowing the witness an opportunity to review  
21 the entirety of the response to production 2?  
22 MS. COTCA: Not at all.

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1 MR. PEZZI: Okay.  
2 MS. COTCA: But this is a --  
3 MR. PEZZI: Well, then why don't we let  
4 him finish reading it, and you can ask whatever  
5 questions you want.  
6 MS. COTCA: And I would appreciate you  
7 letting me finish my statement on the record.  
8 MR. PEZZI: Absolutely.  
9 MS. COTCA: And not interrupting me.  
10 BY MS. COTCA:  
11 Q Okay. Have you had a chance to review  
12 it?  
13 **A Yes, I have.**  
14 Q Thank you. So, again, I just want to  
15 focus your attention on the request.  
16 Have you seen this request before?  
17 **A No.**  
18 Q Okay. Have you conducted any searches of  
19 any of your e-mails or records in response to this  
20 request?  
21 **A No.**  
22 Q Okay. That's all I have.

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1 MR. PEZZI: That's all you have for this  
2 document, or that's all you have, period?  
3 MS. COTCA: For this document. I just  
4 need a minute.  
5 MR. PEZZI: Take your time.  
6 BY MS. COTCA:  
7 Q Oh, one more question.  
8 Mr. Scholl, were you involved -- did you  
9 have any direct involvement in the State  
10 Department's search for records in response to any  
11 of the requests pertaining to the Benghazi  
12 attacks?  
13 MR. PEZZI: Objection. Foundation.  
14 **A Direct involvement?**  
15 Q Uh-huh.  
16 **A Inasmuch as my branches were involved  
17 with the production and review.**  
18 Q Okay. Let me focus you on summer of  
19 2014. In responding to congressional requests for  
20 documents relating to the Benghazi attack in 2012,  
21 did you have any direct involvement?  
22 **A Not that I recall.**


1 Q Are you familiar with Jamie Bair?  
 2 A **Familiar with? I've heard his name.**  
 3 Q Okay. And who is he?  
 4 A **He was an attorney from the Office of**  
 5 **Legal Advisor, from what I recall.**  
 6 Q Okay. Did you have any discussions with  
 7 Mr. Bair about Secretary Clinton's e-mails?  
 8 A **Not that I recall.**  
 9 Q Were you ever informed or advised by  
 10 Mr. Bair or anyone else back in 2014 that the  
 11 State Department may receive public attention with  
 12 respect to Secretary Clinton's e-mails?  
 13 A **Not that I recall.**  
 14 MS. COTCA: That's all I have.  
 15 MR. PEZZI: Nothing from the government.  
 16 VIDEO SPECIALIST: If there are no  
 17 further questions then this ends the deposition,  
 18 and we are going off the record at 15:39.  
 19 (Off the record at 3:39 p.m.)

20  
21  
22

1 ACKNOWLEDGMENT OF DEPONENT  
 2 I, PATRICK DANIEL SCHOLL, 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)

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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 29th day of October,  
 14 2019.  
 15  
 16 My commission expires: September 14, 2023  
 17  
 18   
 19 -----  
 20 NOTARY PUBLIC IN AND FOR THE  
 21 DISTRICT OF COLUMBIA  
 22

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