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# Transcript of Monica Tillery

**Date:** June 3, 2019

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

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Transcript of Monica Tillery  
Conducted on June 3, 2019

1	3
1 IN THE UNITED STATES DISTRICT COURT	1 A P P E A R A N C E S
2 FOR THE DISTRICT OF COLUMBIA	2 ON BEHALF OF PLAINTIFF:
3 ----- x	3 LAUREN M. BURKE, ESQUIRE
4 JUDICIAL WATCH, INC., :	4 RAMONA COTCA, ESQUIRE
5 Plaintiff, :	5 JUDICIAL WATCH, INC.
6 v. : Civil Action No.	6 425 Third Street, SW
7 U.S. DEPARTMENT OF STATE, : 14-01242 (RCL)	7 Suite 800
8 Defendant. :	8 Washington, DC 20024
9 ----- X	9 (202) 646-5172
10	10
11 Videotaped Deposition of MONICA TILLERY	11 ON BEHALF OF DEFENDANT:
12 Washington, DC	12 JOSHUA E. GARDNER, ESQUIRE
13 Monday, June 3, 2019	13 STEPHEN M. PEZZI, ESQUIRE
14 9:59 a.m.	14 ROBERT PRINCE, ESQUIRE
15	15 U.S. DEPARTMENT OF JUSTICE
16	16 FEDERAL PROGRAMS BRANCH
17	17 1100 L Street, NW
18	18 Washington, DC 20005
19	19 (202) 305-7583
20 Job No.: 242898	20
21 Pages 1 - 97	21
22 Reported by: Debra A. Whitehead	22
2	4
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2 at the offices of:	2 ON BEHALF OF DEFENDANT:
3	3 MICHAEL LIEBERMAN, ESQUIRE
4 PLANET DEPOS - DC	4 UNITED STATES DEPARTMENT OF STATE
5 1100 Connecticut Avenue, NW	5 2201 C Street, NW
6 Suite 950	6 Washington, DC 20520
7 Washington, DC 20036	7 (202) 647-8042
8 (888) 433-3767	8
9	9
10	10 ALSO PRESENT:
11 Pursuant to notice, before Debra A. Whitehead,	11 MILES TAG, Video Specialist
12 an Approved Reporter of the United States District	12
13 Court and Notary Public of the District of Columbia.	13
14	14
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P R O C E E D I N G S

1 VIDEO SPECIALIST: Here begins Disk  
2 Number 1 in the videotaped deposition of Monica  
3 Tillery in the matter of Judicial Watch, Inc.,  
4 versus the U.S. Department of State, in the United  
5 States District Court for the District of  
6 Columbia, Case Number 14-1242 (RCL).  
7 Today's date is June 3rd, 2019. The time  
8 on the video monitor is 9:59 a.m. The  
9 videographer today is Miles Tag, representing  
10 Planet Depos. This video deposition is taking  
11 place at 1100 Connecticut Avenue, Northwest,  
12 Washington, DC.  
13  
14 Would counsel please voice-identify  
15 themselves and state whom they represent.  
16 MS. BURKE: Lauren Burke, for Judicial  
17 Watch.  
18 MS. COTCA: Ramona Cotca, for Judicial  
19 Watch.  
20 MR. LIEBERMAN: Michael Lieberman, for  
21 the Department of State.  
22 MR. PEZZI: Stephen Pezzi, from the

8

1 Department of Justice, on behalf of the Department  
2 of State.  
3 MR. GARDNER: Josh Gardner, with the  
4 Department of Justice, on behalf of the defendant.  
5 MR. PRINCE: Robert Prince. I'm from the  
6 Department of Justice, on behalf of the defendant.  
7 The court reporter today is Debbie  
8 Whitehead, representing Planet Depos.  
9 Would the reporter please swear in the  
10 witness.  
11 MONICA TILLERY,  
12 having been duly sworn, testified as follows:  
13 EXAMINATION BY COUNSEL FOR THE PLAINTIFF  
14 BY MS. BURKE:  
15 Q Good morning, Ms. Tillery.  
16 A Good morning.  
17 Q My name is Lauren Burke. I represent  
18 Judicial Watch in this case against the State  
19 Department. This is a FOIA case about the talking  
20 points and communications related to the 2012  
21 attacks in Benghazi.  
22 Are you familiar with this case?

9  
1 **A I don't remember the case.**  
2 Q You don't remember. Okay. Well, as I  
3 said, this is a FOIA case Judicial Watch brought  
4 against the Department of State. And it  
5 specifically relates to the talking points and  
6 communications related to the attacks in Benghazi  
7 in 2012. As we go along, perhaps you'll -- it  
8 will refresh your memory a little bit.  
9 You have been brought here because of  
10 your involvement in the search and production of  
11 records in this FOIA litigation. And so we'll  
12 talk a little bit more about what you remember  
13 and -- and what your involvement was specifically  
14 related to the Judicial Watch case against the  
15 Department of State.  
16 **A Okay.**  
17 Q Have you ever been deposed before?  
18 **A No.**  
19 Q I assure you it's pretty painless. As  
20 you noticed, the court reporter did just take your  
21 oath, and that you'll answer all questions  
22 honestly. And we trust that you will do so to the

10  
1 best of your knowledge.  
2 If you don't have the answer to the  
3 question, I'm asking that please don't guess; only  
4 respond to the best of your ability.  
5 You'll -- you do see before you that we  
6 have a court reporter as well as a videographer.  
7 Please don't be intimidated. They're simply here  
8 to make sure everyone's questions and answers are  
9 accurately put on the record.  
10 And in order to do so, we all need to  
11 speak clearly and one at a time. So I will do my  
12 best not to speak over you, and -- while you're  
13 responding to my questions, and I ask that you do  
14 the same.  
15 If you just wait for me to finish asking  
16 the question. Even if you may anticipate, wait  
17 until the question has been fully asked before  
18 responding.  
19 As well, it's very important that you  
20 give verbal responses. The court reporter cannot  
21 pick up any nods or gestures. So you must speak  
22 your answers at all times.

11  
1 I'll do my best to ask questions as  
2 clearly as possible, but sometimes that doesn't  
3 always happen. So if at any time you don't  
4 understand the question or you need for me to  
5 clarify what I'm asking, please don't hesitate to  
6 tell me, and I will do my best to reanswer it so  
7 that it's in a clear manner.  
8 Also, while we are not in a courtroom,  
9 the purpose here today is to get things on record.  
10 And that includes your attorneys. So there will  
11 be times that they object to a question or the way  
12 that I'm asking something. That's their way,  
13 again, of noting it on the record.  
14 And it doesn't mean that you do not have  
15 to answer. Unless your attorneys instruct you not  
16 to answer after they have noted their objection,  
17 you can proceed with answering the question as it  
18 has been asked.  
19 I don't anticipate that we'll go too long  
20 today. But if at any point you need a break,  
21 don't hesitate to let us know and we'll take a  
22 break at any moment.

12  
1 **A Okay.**  
2 Q Now, as I mentioned, this is a Judicial  
3 Watch FOIA case that was seeking specifically  
4 updates and/or talking points provided to  
5 Ambassador Susan Rice by the White House or any  
6 agency regarding the 2012 attacks in Benghazi and  
7 all communications concerning updates and drafts  
8 of those talking points.  
9 I'm just going to ask you a few  
10 background questions. Bear with me.  
11 Who do you work for?  
12 **A I work for the U.S. Department of State.**  
13 Q And how long have you worked for the  
14 Department of State?  
15 **A January 2002.**  
16 Q And what is your position with the  
17 Department of State?  
18 **A Currently I'm the acting branch chief for**  
19 **the Advocacy and Oversight Branch in the Office of**  
20 **Information Programs and Services.**  
21 Q And how long have you held that position?  
22 **A Recently. I want to say August 2018.**

13  
1 Q And what was your position prior to that?  
2 A **Government information specialist.**  
3 Q With the same branch?  
4 A **Different branch.**  
5 Q If you can expand a little bit on the  
6 various branch or the -- within the Department of  
7 State that you work for.  
8 A **Before I -- before this current position,**  
9 **I was detailed on the Clinton e-mails. And before**  
10 **the Clinton e-mails, I was a litigation analyst.**  
11 Q When were you the litigation analyst?  
12 A **2009 until February or March of 2015.**  
13 Q So the time period that this lawsuit  
14 surrounds will fall within that period of  
15 litigation analyst from 2009 to 2015. We are  
16 speaking specifically around 2014, 2015.  
17 A **Okay.**  
18 Q Do you have a legal background?  
19 A **No.**  
20 Q In -- and again, this -- specifically  
21 speaking about your position as the litigation  
22 analyst back in 2014, roughly, 2015.

14  
1 What were your role -- what was your role  
2 as the litigation -- as a litigation analyst?  
3 A **To process requests that were the subject**  
4 **of litigation against the department.**  
5 Q And could you expand a little bit and  
6 explain what that means, "process"?  
7 A **Once the case goes into litigation -- I'm**  
8 **a little rusty, so I'm trying to remember here.**  
9 Q Sure.  
10 A **Once the case goes into litigation, the**  
11 **branch chief will assign the case to the analyst.**  
12 **I would notify the -- give me a minute here.**  
13 **I would notify the initial processing**  
14 **analyst that the case is now in litigation. The**  
15 **next step would be to retrieve the case file,**  
16 **review what the previous actions that were taken**  
17 **on the case by the previous analyst.**  
18 **Then I would -- it's been a while, so**  
19 **please give me a minute -- prepare a litigation**  
20 **report for the branch chief and the assigned L**  
21 **attorney.**  
22 **I would consult with the branch chief, as**

15  
1 **well as the L attorney, about what offices may**  
2 **contain responsive material.**  
3 **The next step would be to task those**  
4 **offices.**  
5 **The next step would be to wait for the**  
6 **responses from the search offices. If there were**  
7 **documents, I would ensure that the documents were**  
8 **scanned and ingested into the system, update**  
9 **electronic tracking system, assign a reviewer.**  
10 **Once the documents are reviewed, forward**  
11 **the material to the branch chief or the L attorney**  
12 **to clear. Once the clearances have been -- once I**  
13 **obtain all the clearances, if there are responsive**  
14 **material, I would draft a release letter for the**  
15 **plaintiff to -- to be forwarded to the -- just**  
16 **draft a release letter for the plaintiff.**  
17 Q Okay. And I appreciate that you --  
18 walking through those steps and sort of the  
19 processing. And I may back -- back up a little  
20 bit.  
21 So when a case went into litigation, you  
22 said that you notified the initial processing

16  
1 analyst.  
2 A **Yes.**  
3 Q Who would that generally be?  
4 A **Could you clarify? I'm not understanding**  
5 **your question.**  
6 Q Sure. So if a case went into litigation  
7 and came to you, who was it that you needed to  
8 notify that it had gone into litigation?  
9 A **Analyst from a different branch.**  
10 Q From a different branch.  
11 A **Okay.**  
12 Q And then you would review that analyst's  
13 actions?  
14 A **Correct.**  
15 Q Okay. And prepare a litigation report  
16 for -- you said the L attorneys?  
17 A **Assigned L attorney, correct.**  
18 Q What's an L attorney?  
19 A **Acronym for the Office of the Legal**  
20 **Advisor.**  
21 Q And who was your supervisor or boss in  
22 this role?

17  
1 A **Susan Weetman.**  
2 Q What was her title?  
3 A **Supervisory government information**  
4 **specialist.**  
5 Q And I'm going to back up just another  
6 moment.  
7 You mentioned that you were -- worked for  
8 the information processing service?  
9 A **Repeat that again?**  
10 Q I'm sorry. The -- the branch of the  
11 Department of State that you work for.  
12 A **Office of the Information Programs and**  
13 **Services.**  
14 Q Office of the Information Programs and  
15 Services. Is that generally referred to as IPS?  
16 A **Correct.**  
17 Q Would you be comfortable if I refer to it  
18 as IPS?  
19 A **Sure.**  
20 Q Thank you very much.  
21 Did you undertake searches yourself in  
22 your role as the litigation analyst?

18  
1 A **Could you repeat, repeat that again.**  
2 Q Sure. When a request comes in and it  
3 moved into your branch, into the litigation  
4 department, did you undertake searches relative to  
5 the request that was assigned to you?  
6 A **In consultation with the branch chief and**  
7 **the L attorney.**  
8 Q Could you describe the types of searches  
9 that you would do?  
10 A **I guess I'm not quite understanding when**  
11 **you said -- you mean personal -- me, personally,**  
12 **doing the search?**  
13 Q Correct.  
14 A **I -- I don't remember. I can't recall**  
15 **one off the top of my head. I don't remember.**  
16 Q Okay. And when -- so you also mentioned  
17 that you would wait -- I'm sorry. So you assigned  
18 it to a task officer? I'm just running through  
19 my -- I just want to --  
20 A **A reviewer.**  
21 Q A reviewer. And would wait for a  
22 response?

19  
1 A **I'm sorry. Can you repeat that? Which**  
2 **point are you addressing, again? Could you repeat**  
3 **what you just said?**  
4 Q So -- and I'm just looking at my notes --  
5 A **Okay.**  
6 Q -- and I'm just trying to clarify, so ...  
7 A **Okay.**  
8 Q So you would assign it to a reviewer?  
9 A **Correct. After we receive responses from**  
10 **the search offices.**  
11 Q Okay. So I'm --  
12 A **Okay.**  
13 Q -- asking a little bit ahead of that  
14 point.  
15 A **Okay.**  
16 Q You tasked it to offices?  
17 A **Yes. To conduct a search, correct.**  
18 Q To conduct a search.  
19 A **For responsive material.**  
20 Q And what types of offices would you --  
21 would you task the search to?  
22 A **Components within the Department of**

20  
1 **State.**  
2 Q And who made the determination of which  
3 offices would be tasked?  
4 A **In consultation with the branch chief and**  
5 **the L attorney.**  
6 Q You would?  
7 A **I don't have the final say-so. I don't**  
8 **have the final say.**  
9 Q Okay. And you would wait for a response  
10 from those offices that you tasked --  
11 A **Correct.**  
12 Q -- the search with?  
13 And then upon receiving responsive  
14 records, they would come back to you?  
15 A **Correct.**  
16 Q And would you review for redactions or  
17 review for responsiveness?  
18 A **Neither.**  
19 Q You did not. Who did that?  
20 A **A reviewer.**  
21 Q And what would they be reviewing?  
22 A **The material that was retrieved from the**

21

**1 search offices.**  
2 Q And then who approves the  
3 responsiveness -- who would approve the reviewer's  
4 responsiveness?  
5 MR. PRINCE: Objection. Foundation.  
6 Q So when the reviewer reviewed the -- the  
7 documents and determined if they were responsive,  
8 who would then review that determination of  
9 responsiveness?  
**10 A The reviewer?**  
11 Q And when they were finished with their  
12 review, where would -- what would the next step  
13 be?  
**14 A The next step would be to prepare the**  
**15 package for clearance from the branch chief and**  
**16 the L -- assigned L attorney.**  
17 Q And then once you received approval from  
18 the branch chief or -- and/or the assigned  
19 L attorney, what was the next step?  
**20 A Prepare the package for release.**  
21 Q To?  
**22 A To the plaintiff.**

22

1 Q To the plaintiff, the requestor.  
2 Once records were released to the  
3 plaintiff and a case proceeded through litigation,  
4 were you involved in -- were you ever involved in  
5 the next steps of litigation?  
6 MR. PRINCE: Objection. Form.  
7 **A Could you ...**  
8 MR. PRINCE: I'm sorry.  
9 Q You can answer.  
**10 A Could you clarify that?**  
11 Q So once you have released the approved  
12 records to a requestor, did your responsibilities  
13 end there, or were you still involved as  
14 litigation proceeded?  
**15 A My responsibility end there.**  
16 Q Ended there.  
17 Do you know what a Vaughn index is?  
**18 A Yes.**  
19 Q Can you describe to me what a Vaughn  
20 index is to you?  
**21 A It contains a list of documents the**  
**22 Department of State withholds. It gives a**

23

**1 description of -- it contains a list of documents**  
**2 that the document -- that the State Department**  
**3 withhold in the request.**  
4 Q Okay. Were you ever involved in putting  
5 together or drafting a Vaughn index?  
**6 A Not drafting.**  
7 Q Not drafting. In consulting on the  
8 drafting of a Vaughn index?  
**9 A No, I'm not involved in that process of**  
**10 consulting. No.**  
11 Q Are you familiar with -- strike that.  
12 In your role in the litigation -- as  
13 litigation analyst, did you ever handle  
14 congressional requests?  
**15 A I don't recall.**  
16 Q When a request had proceeded to the point  
17 of litigation and it came to your department, went  
18 through the process that you just laid out for us  
19 and proceeded further in litigation before the  
20 court, were you ever involved in providing a  
21 declaration or a supporting statement for that  
22 litigation?

24

**1 A Could you repeat that, please.**  
2 Q Sure. As litigation proceeds in -- in  
3 FOIA cases and they move past and into the  
4 courtroom to go before the judge, were you ever  
5 involved in providing information for an affidavit  
6 or a declaration for the cases that you had been  
7 tasked with?  
**8 A Yes. I have drafted declarations for**  
**9 cases that were assigned to me in litigation.**  
10 Q And when you drafted those declarations,  
11 did you sign them for submission, or were they  
12 submitted to a superior?  
13 MR. PRINCE: Objection. Form.  
14 Q You can answer.  
15 Do you ever sign the declaration that you  
16 had drafted?  
**17 A No.**  
18 Q Okay. I'm going to move on to the  
19 specifics of the case that we're here for today.  
20 And I appreciate you sort of bearing with me to  
21 work through the process of -- the Department of  
22 State is very large, as well as the IPS division

25  
1 and branch itself. So sometimes we need to get a  
2 little bit of a handle on it.  
3 As I mentioned, we are here for a  
4 specific case, it's Judicial Watch versus the  
5 Department of State. It is related to talking  
6 points for a request that was submitted to the  
7 Department of State in May 13 of 2014.  
8 Are you aware of the request that is at  
9 issue today?  
10 **A I don't remember the request.**  
11 Q You don't remember the request.  
12 MS. BURKE: I'm going to mark this as  
13 Exhibit 1.  
14 (Tillery Deposition Exhibit 1 marked for  
15 identification, retained by counsel.)  
16 Q So we've just handed you what's been  
17 marked as Exhibit 1. If you could take a look  
18 over it.  
19 For identification on the record, what  
20 I've handed you is an e-mail that at the bottom is  
21 identified as DOS-00000066. And at the top it  
22 is -- appears to be a printout from the e-mail of

26  
1 Bryan A. Grulkowski.  
2 I'm going to draw your attention down to  
3 the bottom of Page 1. It appears to be an e-mail  
4 from you, sent to Edgar Jaramillo on August 8,  
5 2014.  
6 Is that an accurate representation of  
7 what's in front of you?  
8 **A It appears to be an e-mail that I sent to**  
9 **him, yes.**  
10 Q And if you turn to Page 2, the message  
11 says "The requestor has now filed suit against the  
12 Department for information sought in the subject  
13 case. The case needs to be closed out in CR so I  
14 can open a litigation case."  
15 Is that an accurate representation of  
16 what's stated there?  
17 **A Yes.**  
18 Q Does this refresh your recollection of  
19 the case at hand, which is Case Number 2014-8848?  
20 **A No.**  
21 Q Who is Edgar Jaramillo?  
22 **A He was the previous case analyst on the**

27  
1 **case before it went into litigation.**  
2 Q On what case?  
3 **A On Case Number F-2014-08848.**  
4 Q Do you know who Kate Bailey is?  
5 **A I don't know who she is.**  
6 Q I'm going to take a step back and just  
7 ask you. I apologize, I had forgotten to ask you.  
8 Before you came to the deposition today,  
9 did you review any documents or have any  
10 conversations regarding your deposition today,  
11 testimony today?  
12 MR. PRINCE: To the extent that that does  
13 not involve privileged information, you may  
14 answer.  
15 **A Yes. We met May -- the end of May, I**  
16 **forgot what date.**  
17 Q You met with your attorney?  
18 **A Correct.**  
19 Q And did you review any documents?  
20 **A Yes. But not review them. I wouldn't**  
21 **say review them.**  
22 Q Did you look them over?

28  
1 **A Yes.**  
2 Q What documents --  
3 **A This is --**  
4 Q Did you review --  
5 **A This is familiar. I'm recently seen this**  
6 **document.**  
7 Q You have recently seen this document?  
8 **A Yes, I've recently seen this document.**  
9 Q But you don't know what this document  
10 relates to?  
11 **A It appears that a case that I worked on,**  
12 **but I don't remember the case.**  
13 Q If I can back up a little bit.  
14 So what documents did you review in  
15 preparation for your testimony today?  
16 MR. PRINCE: Objection. Privilege.  
17 Q You did review documents in preparation  
18 for your deposition today?  
19 **A When you mean "review," would you clarify**  
20 **that?**  
21 Q I'm trying to think how to clarify  
22 "review."



29

1           Were you -- did you look over documents  
2 that are related to the case that we are here  
3 today for your deposition?  
4     **A This document --**  
5     Q Not necessary --  
6     **A This document -- I've recently seen this**  
7 **document, yes.**  
8     Q Was it in preparation for your deposition  
9 today?  
10    **A Yes.**  
11    Q What other documents?  
12    **A I don't remember all -- I can't recall**  
13 **them off the top of my -- I can't remember.**  
14    Q Prior to coming -- prior to me telling  
15 you what the case was about and all of that, what  
16 was your understanding that you were being asked  
17 to -- to come in today for a deposition?  
18    **A You all had questions about a case that I**  
19 **processed.**  
20    Q And you have no recollection of the case  
21 itself?  
22    **A No. I process many litigation cases. I**

30

1 **don't remember this case.**  
2     Q And so your understanding was that you  
3 were coming in today to answer questions about a  
4 case.  
5     **A Correct.**  
6     Q Did you know the name of the case that  
7 you were coming to answer questions about?  
8     **A All I can remember is a Judicial Watch**  
9 **case.**  
10    Q And did you know the subject matter of  
11 the case that you would be asking -- answering  
12 questions about?  
13    **A I'm trying to remember.**  
14    **No. I don't remember the actual topic.**  
15    Q Of what --  
16    **A Yeah.**  
17    Q -- the case was about?  
18    **A Correct.**  
19    Q What did you think you were going to be  
20 answering questions about?  
21    **A A particular case that went into**  
22 **litigation.**

31

1           MR. PRINCE: Objection. To the extent  
2 this is related to the discussions that we had,  
3 they are privileged. And I instruct you not to  
4 answer. But to other extent, if you can answer  
5 without disclosing privileged information, you may  
6 answer.  
7           THE WITNESS: Okay.  
8     Q Do you know who James Bair is?  
9     **A Yes.**  
10    Q Who is he?  
11    **A An L attorney.**  
12    Q And -- and you said an L attorney is in  
13 the Office of Legal Advisor?  
14    **A Correct.**  
15    Q And where is the Office of Legal Advisor  
16 housed, or -- that's the Office of the Legal  
17 Advisor, Department of State?  
18    **A Correct.**  
19    Q For the entire Department of State or for  
20 a specific branch?  
21    **A The entire Department of State.**  
22    Q In your role as a litigation analyst, did

32

1 you ever work together with James Bair?  
2     **A Yes.**  
3     Q And what capacity?  
4     **A He was assigned to cases that I've worked**  
5 **on.**  
6     Q And in what capacity was ...  
7     **A Can you clarify that?**  
8     Q So he was assigned to cases that you  
9 worked on.  
10    **A Correct.**  
11    Q Were you -- was he a superior? Was he a  
12 colleague, you did the same type of work on cases  
13 that you were assigned on?  
14    MR. PRINCE: Objection. Form.  
15    You may answer.  
16    Q I'm trying to -- I'm just trying to get  
17 an understanding of -- of the relationship of  
18 you -- your working together on certain cases.  
19    **A I would say he was someone I consult**  
20 **with. We have -- on legal matters regarding the**  
21 **case.**  
22    Q You would consult with him?

33

1 **A Correct.**  
2 Q Would you call him your superior?  
3 **A No.**  
4 Q Who is Jonathan Wasser?  
5 **A I don't remember. I don't remember who**  
6 **Jonathan Wasser is.**  
7 Q Jonathan Wasser? Okay.  
8 MS. BURKE: I'm going to introduce -- if  
9 you could mark -- introduce Exhibit Number 2.  
10 MR. PRINCE: Excuse me for a second. I'm  
11 not sure my client was done with her answer.  
12 MS. BURKE: Oh, I apologize.  
13 **A I believe FOIA -- a FOIA point of contact**  
14 **for one of the bureaus, I -- I know it's not in L.**  
15 **I don't recall who he is.**  
16 MS. BURKE: Can you mark this as Exhibit  
17 2.  
18 (Tillery Deposition Exhibit 2 marked for  
19 identification, retained by counsel.)  
20 Q And, for the record, I've handed you  
21 what's been marked as Exhibit 2. It's identified  
22 at the bottom as DOS-67. And at the top it is --

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1 appears to be an e-mail from Edgar Jaramillo to  
2 which you are copied on, as well as Saffie Goushe.  
3 It reads, "JB, I sent this case to Monica  
4 Tillery in our litigation office since she  
5 requested it. However, Saffie Goushe (taking over  
6 Cristina Logg's Benghazi cases) will probably  
7 handle the case."  
8 Does this look familiar to you?  
9 **A I've recently seen this document, but I**  
10 **don't remember it. I don't remember that e-mail.**  
11 Q The topic appears to be "F-2014-8848  
12 assigned to: EAN."  
13 What is EAN?  
14 **A It's an acronym for one of the branches**  
15 **within the office of IPS.**  
16 Q What does the acronym stand for?  
17 **A I don't recall.**  
18 Q "Kate Bailey, Judicial Watch. Records  
19 from Secretary of State relating to TPs or updates  
20 given to Ambassador Rice" by White House -- "by WH  
21 or any federal agency."  
22 Do you recall any of -- a case relating

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1 to any of those branches, people, individuals, or  
2 topics?  
3 **A No, I don't.**  
4 MS. BURKE: Can you mark this as Exhibit  
5 3.  
6 (Tillery Deposition Exhibit 3 marked for  
7 identification, retained by counsel.)  
8 **A I'd like to make a correction. Jonathan**  
9 **Wasser, FOIA contact for maybe the Office of the**  
10 **Secretary.**  
11 Q Okay.  
12 **A Oh.**  
13 Q For identification, I've handed you  
14 what's been marked as Exhibit 3. At the bottom  
15 it's identified as DOS-77. It appears to be a  
16 memorandum to Clarence Finney, with a copy to  
17 yourself, from Jonathan Wasser.  
18 If you could take a moment to review  
19 what's in front of you.  
20 You've had a chance to review it. Do you  
21 recognize this document?  
22 **A I've recently seen it, but I don't**

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1 **remember it.**  
2 Q Having read it and recently seen it --  
3 and I understand you don't remember the document  
4 itself -- do you remember any of the details that  
5 are outlined with regard to the request that's at  
6 issue?  
7 **A Repeat that?**  
8 Q Do you remember any of the -- the details  
9 that are outlined here as --  
10 MR. PRINCE: Objection. Form.  
11 Q You can answer.  
12 **A I don't remember.**  
13 Q You don't recall ever working on a case  
14 concerning Benghazi attacks?  
15 **A I don't remember.**  
16 Q Okay. On Page -- if you could just turn  
17 to Page 4.  
18 Can you tell me what this document is,  
19 generally speaking?  
20 **A This document is used -- it's a Search**  
21 **Tasker. It's what the analyst would use to send**  
22 **to the components within the department to -- to**

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**1 fill out once they complete their search.**  
2 Q And the analyst, was that the role that  
3 you -- that you served, the litigation analyst?  
4 A Yes.  
5 Q In two thousand -- at this time, this was  
6 2014, July.  
7 A Yes.  
8 Q Is this a type of document that you would  
9 use in your role as a litigation analyst?  
10 A Yes.  
11 Q As we look at this specific document, it  
12 appears -- this -- this Search Tasker is dated  
13 July 9, 2014. It says Case Number F-2014-08848.  
14 And it states the Requestor Name, Kate Bailey.  
15 The third line down there, it says  
16 "From," and it looks like Edgar Jaramillo's name  
17 has been crossed out. Is that an accurate  
18 representation of what's on the paper?  
19 A Yes.  
20 Q And whose name has been placed in place  
21 of his?  
22 A It appears to be my name.

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1 Q It says -- and so would it be fair to say  
2 that this Search Tasker shows that you were  
3 tasked, or are tasking, I'm not quite sure what  
4 that role is, in association with F-2014-08848  
5 from requestor Kate Bailey, on July 9, 2014?  
6 MR. PRINCE: Objection. Form and  
7 foundation.  
8 Q Would you like -- I can ...  
9 The Search Tasker form that's in front of  
10 you?  
11 A Correct.  
12 Q For Case Number F-2014-08848, who does it  
13 appear was responsible for tasking that case  
14 number, according to this document?  
15 MR. PRINCE: Objection. Form.  
16 Q Who -- who is the analyst's name that is  
17 listed there?  
18 A Could you clear up, listed where?  
19 Q On the form in front of you.  
20 A Okay.  
21 Q That shows Case Number F-2014-08848. The  
22 analyst's name, which appears to be on the third

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1 line down.  
2 A Okay.  
3 Q In the "From," who is the analyst  
4 assigned to that case number, according to this  
5 document?  
6 MR. PRINCE: Objection. Form and  
7 foundation.  
8 Q You can answer still.  
9 A There -- it appears my name and Edgar's  
10 name there.  
11 Q So is it fair to say that you and Edgar  
12 were an analyst working on this case number?  
13 A Correct.  
14 Q According to this form.  
15 A Yes.  
16 Q Yes. Okay.  
17 If you could turn to the last couple of  
18 pages.  
19 This is a May 13, 2014, Freedom of  
20 Information Act Request, from Judicial Watch, who  
21 is the plaintiff in this case.  
22 Have you seen this request?

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1 A Recently.  
2 Q Recently.  
3 And do you see at the top it's  
4 F-2014-08848?  
5 A Correct.  
6 Q What does that mean?  
7 A That's the case number that was assigned  
8 to this request.  
9 Q So this request is assigned that case  
10 number?  
11 A Correct.  
12 Q And from this document it appears that an  
13 analyst that is listed is your name.  
14 A Repeat that once again?  
15 Q From this document, the analyst assigned  
16 appears to be Monica Tillery.  
17 MR. PRINCE: Objection. Form.  
18 Q As you look at this -- you can answer the  
19 question.  
20 Are you not understanding what I'm -- I'm  
21 asking, or are you disputing what the document  
22 appears to represent?

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1 MR. PRINCE: Objection. Form and  
2 foundation.  
3 **A Repeat that last statement that you just**  
4 **made?**  
5 Q Well, I was just asking -- I'm still  
6 waiting for you to answer my question whether or  
7 not you were disputing what the document says or  
8 if you were not understanding the question.  
9 MR. PRINCE: Objection. Form.  
10 Foundation.  
11 **A I don't know why I put my name there.**  
12 Q Okay. So you don't know why your name is  
13 on this form.  
14 **A My name is there. I don't know why it's**  
15 **there.**  
16 Q Do you know why you would have been  
17 copied on the memorandum from Clarence Finney to  
18 Jonathan Wasser, on the first page?  
19 **A I don't know why they copied me.**  
20 Q Would it be possible that it was because  
21 you were assigned to this case?  
22 **A Yes. But your question was why did he**

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1 **copy me. So I don't know why they copied me.**  
2 MR. PRINCE: Can we go off the record for  
3 a minute?  
4 MS. BURKE: Sure. Yes.  
5 VIDEO SPECIALIST: Please stand by.  
6 We are going off the record. The time is  
7 10:56 a.m.  
8 (A recess was taken.)  
9 VIDEO SPECIALIST: We are back on the  
10 record. The time is 11:12 a.m.  
11 MR. PRINCE: Before we proceed, I want to  
12 note for the record that Ms. Tillery reserves the  
13 right to read and sign the deposition transcript.  
14 MS. BURKE: Sure.  
15 BY MS. BURKE:  
16 Q And I apologize, you are correct. Page 1  
17 of is that -- that document was missing. We have  
18 it in a whole other exhibit because it was in  
19 duplicate. So I do apologize. This hopefully  
20 will clear up some confusion. I'm going to pass  
21 it around. But this is part of Exhibit 1. This  
22 is the first page.

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1 MR. PRINCE: How -- how do we need to  
2 mark that?  
3 MS. BURKE: Is it an addendum?  
4 (A discussion was held off the record.)  
5 (Tillery Deposition Exhibit 3A marked for  
6 identification, retained by counsel.)  
7 BY MS. BURKE:  
8 Q Ms. Tillery, what has been marked as  
9 Exhibit 3A is the first page to this specific  
10 document. And if you want to take a moment and  
11 take a look at it.  
12 This appears to be a memorandum that is  
13 directed to you. Is that what that represents --  
14 or, I'm sorry. Is that an accurate representation  
15 of the paper -- the document in front of you?  
16 **A Correct.**  
17 Q And it is from a Clarence Finney, Jr.  
18 Do you know who Clarence Finney is?  
19 **A I don't know his title, but I believe he**  
20 **was a branch chief.**  
21 Q And the subject matter is the "Freedom of  
22 Information Act, IPS 201408848 (Requesting all

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1 updates and/or talking points given to Ambassador  
2 Rice by the White House or any federal agency  
3 concerning the September 11, 2012, attack on the  
4 U.S. Consulate in Benghazi Libya)."  
5 Why would Clarence Finney be sending you  
6 a memorandum on that topic for that particular  
7 case number?  
8 **A I don't know why he would send it to me.**  
9 Q What is this -- I apologize.  
10 **A That's okay.**  
11 Q What -- if you take a look -- actually,  
12 I'll just go ahead and read it. "The Office of  
13 Correspondence and Records searched the  
14 Secretariate Tracking and Retrieval System, STePs,  
15 and the Top Secret Files, and found zero documents  
16 related to the above-referenced tasker. Jonathan  
17 Wasser, a GS-11 management analyst, spent 1 hour  
18 performing the search."  
19 I'm just going to pick your brain a  
20 little bit. What is the Office of Correspondence  
21 and Records?  
22 **A It's a component within the Office of the**

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**1 Secretary.**  
**2 Q** And they searched the Secretariat  
**3 Tracking and Retrieval System, STARS.**  
**4 Are you -- what is STARS?**  
**5 A I don't know what STARS is.**  
**6 Q** STePs, what is STePs?  
**7 A I don't know what STePs.**  
**8 Q** In the top secret files.  
**9 A I don't know where their top secret files**  
**10 are.**  
**11 Q** Why would Clarence Finney be telling you  
**12 that zero documents related to the above**  
**13 referenced tasker Jonathan Wasser were performed?**  
**14 A This document to me appears that this is**  
**15 their search response to a specific case.**  
**16 Q** And who is it -- who is it addressed to?  
**17 A This document is addressed to me.**  
**18 Q** So this document is a -- how did you  
**19 describe it?**  
**20 A This document is addressed to me.**  
**21 Q** Right. But how did you describe the  
**22 document itself?**

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**1 A It appears -- this search office response**  
**2 to a particular case, to a specific case.**  
**3 Q** So this search office response to this  
**4 particular case, 2014-08848, was addressed to you?**  
**5 MR. PRINCE:** Objection. Form.  
**6 You may answer.**  
**7 A Yes.**  
**8 Q** Is it safe to say that you were assigned  
**9 to that case number, and that is why Clarence**  
**10 Finney was providing you with the search response**  
**11 memorandum?**  
**12 A Yes.**  
**13 Q** Okay. If you could go to Page 3 of  
**14 Exhibit 3.**  
**15 At the bottom it states, Date Range**  
**16 9/1/2012 to 12/31/2012.**  
**17 Who would have assigned that date range?**  
**18 A I don't know.**  
**19 Q** In any given assigned task -- or any  
**20 given assigned case, who assigned date ranges?**  
**21 A I don't know.**  
**22 Q** Was that the date range used for the

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**1 search in this case?**  
**2 A I don't know.**  
**3 Q** Okay. You can set that aside for a  
**4 moment.**  
**5 Let me ask you, who was your chief**  
**6 branch -- or your branch chief, chief branch?**  
**7 A You mean now or when I was in litigation?**  
**8 Q** When -- the specific time that we're  
**9 talking about, when you were a litigation analyst.**  
**10 A Susan Weetman.**  
**11 Q** Susan Weetman.  
**12 And who assigned cases to you?**  
**13 A Susan Weetman.**  
**14 Q** And she is who you would report back to?  
**15 A Correct.**  
**16 Q** In your role as litigation analyst, after  
**17 you would task cases or requests out to other**  
**18 offices, what were your responsibilities in**  
**19 following up or setting deadlines?**  
**20 A Can you clarify that? Can you repeat**  
**21 that again for me, please?**  
**22 Q** So what were your role and

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**1 responsibilities on a request, once they were**  
**2 tasked out to the other offices?**  
**3 A Give me a minute here.**  
**4 Q** Uh-huh.  
**5 A I would ensure that the offices would**  
**6 respond to the search -- I will make sure they**  
**7 will respond to the search -- if there were**  
**8 deadlines that were given, make sure they**  
**9 responded in a timely manner. Make sure they**  
**10 responded on time.**  
**11 Q** And who would set those deadlines?  
**12 A In consultation with the branch chief and**  
**13 the assigned L attorney.**  
**14 Q** You would, in consultation?  
**15 A Yes.**  
**16 MS. BURKE:** Can you mark this as Exhibit  
**17 4.**  
**18 (Tillery Deposition Exhibit 4 marked for**  
**19 identification, retained by counsel.)**  
**20 MS. BURKE:** I apologize.  
**21 For identification purposes, this is**  
**22 marked DOS-647. And the first page appears to be**

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1 an e-mail from Jonathan Wasser to James Bair,  
2 Clarence Finney, with a copy to Monica Tillery,  
3 dated Tuesday, March 17, that's the date of the  
4 top e-mail.  
5 Q If I can draw your attention to the  
6 second page, in the e-mail below the redacted  
7 e-mail. That's from Monica Tillery on September  
8 11, 2014, to James Bair.  
9 Who is James Bair?  
10 **A Attorney in L.**  
11 Q Attorney in the legal -- Office of the  
12 Legal Advisor?  
13 **A Yes.**  
14 Q And it reads, "Jamie, Attached is S/ES-CR  
15 search response for the subject case. Let me know  
16 your thoughts. Thanks, Monica."  
17 The subject case being FOIA Request  
18 F-2014-08848?  
19 I just believe you just identified in  
20 Exhibit 3 that form was the -- what was known as a  
21 search response.  
22 Why would you be sending attorney James

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1 Bair in the Office of the Legal Advisor the  
2 attached search response for this subject case?  
3 **A He was assigned to this case.**  
4 Q And were you assigned to the case?  
5 MR. PRINCE: Objection. Form.  
6 Q Why would you be sending --  
7 MR. PRINCE: She was about to answer.  
8 MS. BURKE: I apologize.  
9 **A It appears from the documents, yes, I was**  
10 **assigned this case.**  
11 Q And so you would have set the deadlines  
12 for the search?  
13 **A In consultation with the branch chief and**  
14 **the L -- and the L assigned attorney.**  
15 Q If I can direct your attention back to  
16 Exhibit 3.  
17 On Page 3 -- which I suppose it's Page 2  
18 of Exhibit 3, but following -- that date range, is  
19 that -- the September 1, 2012, to December 31st,  
20 2012, would those be, that date range be the  
21 deadlines for the search?  
22 **A Repeat that, please?**

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1 Q The date range, September 2012 to  
2 December 2012.  
3 **A Repeat your question.**  
4 Q Would those be the -- would that be the  
5 deadline that was set for the search tasked out?  
6 Would that ...  
7 MR. PRINCE: Objection. Form.  
8 Q What does "date range" mean?  
9 MR. PRINCE: Objection. Form.  
10 **A This is a search response from a search**  
11 **component. This date range is on their search**  
12 **response. So I don't know --**  
13 Q Would --  
14 **A -- what does that actually mean.**  
15 **I don't know what that means on their**  
16 **search response.**  
17 Q On their search response.  
18 Would you have set --  
19 **A I'm sorry. Let me clarify the question.**  
20 Q I'm sorry. I apologize.  
21 **A I'm sorry.**  
22 **You are asking me -- I'm sorry, repeat**

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1 **the question once again about the date range on**  
2 **the -- on this document here.**  
3 Q The date range, September 2012 to  
4 December 2012, is that a deadline?  
5 **A Deadline for what?**  
6 Q For the -- a search -- this is the search  
7 response.  
8 **A Okay. Correct.**  
9 Q The date range, would that be considered  
10 a deadline?  
11 MR. PRINCE: Objection. Form.  
12 **A I guess I'm not clear on your question.**  
13 Q Who would set the date range that is  
14 represented on this page?  
15 **A It's from the office of S/ES. I don't**  
16 **know who would actually set it from that search**  
17 **component.**  
18 **Was that clear?**  
19 Q Would the case -- would the case analyst  
20 set the date range?  
21 **A What case analyst? Who are you referring**  
22 **to? What case analyst?**

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1 Q That's assigned to this case.  
2 A **No. They would not -- no.**  
3 Q The case analyst would not set a date  
4 range for the search.  
5 A **Would not assign? That's what you asked,**  
6 **would they assign the date range?**  
7 Q Would they set a date range for the  
8 search?  
9 A **No.**  
10 Q Who would set this date range?  
11 A **Usually the requestor would set the date**  
12 **range.**  
13 Q And how about when there was no date  
14 range set in the request itself?  
15 A **Repeat that again?**  
16 MS. BURKE: Can you read back the  
17 question.  
18 (Pending question read.)  
19 A **We would ask the attorney to follow up**  
20 **with the plaintiffs maybe to get one.**  
21 Q Let me ask you, you mentioned as in your  
22 role as a -- a litigation analyst, part of your

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1 followup was to make sure that those assigned  
2 responded on time by giving them deadlines.  
3 Would this be the type of deadline that  
4 you would set in a case that you were a litigation  
5 analyst assigned?  
6 MR. PRINCE: Objection. Form.  
7 Foundation.  
8 You may answer.  
9 Q I'm not trying to confuse you, I really  
10 am not.  
11 A **I know.**  
12 Q We're just trying to get it all  
13 clarified, and you're the one that has this  
14 information.  
15 A **Repeat that again. Would -- what**  
16 **deadline are you referring to?**  
17 MS. BURKE: Can you read it.  
18 (The Reporter read the record as follows:  
19 "QUESTION: Let me ask you, you mentioned  
20 as in your role as a litigation analyst, part of  
21 your followup was to make sure that those assigned  
22 responded on time by giving them deadlines. Would

55

1 this be the type of deadline that you would set in  
2 a case that you were a litigation analyst  
3 assigned?")  
4 A **Could you clarify what deadline are**  
5 **you -- what deadline are you referring to?**  
6 Q The date range that is found on Page 3.  
7 A **I don't consider that a deadline.**  
8 Q What would you consider it?  
9 A **A date range.**  
10 Q What's a date range?  
11 A **A date range is a -- a date range for a**  
12 **FOIA request is the time frame you use to search**  
13 **for responsive material.**  
14 Q So the date range at the bottom of this  
15 document shows the time to search for responsive  
16 materials was September 2012 to December 2012.  
17 Is that an accurate reflection of what's  
18 on that paper?  
19 A **Correct.**  
20 Q And that would be the date range that was  
21 set for this case that appears to be, from the  
22 papers, the case that you were the analyst

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1 assigned?  
2 A **It appears that this is what that search**  
3 **office used.**  
4 Q If you could take a look back at Exhibit  
5 4, and turn back to Page 4. It's the first e-mail  
6 set in this chain. It's an e-mail from Monica  
7 Tillery, sent on September 4, 2014, to Jonathan  
8 Wasser, copying Attorney James Bair, FOIA request  
9 F-2014-8848.  
10 Do you recognize that e-mail?  
11 A **I recent -- I've recently seen this**  
12 **document.**  
13 Q When did you recently see this document?  
14 A **End of May.**  
15 Q When end of May? Yesterday --  
16 A **I'm sorry.**  
17 Q Last week was the end of May. Right?  
18 Was it last week?  
19 A **Yes.**  
20 Q Did you recently see this document last  
21 week for purposes of preparing for your deposition  
22 today?

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1 **A Yes.**  
2 Q Do you know why you were shown this  
3 document --  
4 MR. PRINCE: Objection.  
5 Q -- in preparation --  
6 MR. PRINCE: Calls for -- continue.  
7 Sorry.  
8 Q -- in preparation for your deposition  
9 today?  
10 MR. PRINCE: Objection. It calls for  
11 privileged information.  
12 I instruct the witness not to answer.  
13 Q So you recognize this e-mail from last  
14 week.  
15 **A Yes.**  
16 Q What does this e-mail say? And you can  
17 generalize.  
18 **A It's an e-mail that was sent to Jonathan**  
19 **Wasser, from myself, advising him the case is now**  
20 **in litigation, and asks that they complete their**  
21 **search by September the 10th.**  
22 Q Why would you have sent that to Jonathan

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1 Wasser?  
2 **A He was the FOIA contact for the Office of**  
3 **the Secretary, Executive Secretary Records.**  
4 Q And so you were assigning him a request?  
5 **A I wouldn't say "assign."**  
6 Q You were sending him a request for him to  
7 conduct a search of the records?  
8 **A Correct.**  
9 Q The e-mail above it is from James Bair,  
10 to you and Jonathan. He requests an update on the  
11 status of this search.  
12 Why was James Bair looking for a status  
13 update on the search?  
14 MR. PRINCE: Objection. Form.  
15 Q Why would James Bair have been requesting  
16 an update?  
17 **A He was assigned attorney on the case.**  
18 Q So James Bair was the assigned attorney,  
19 you were the litigation analyst, and Jonathan  
20 Wasser was the FOIA contact in the Secretary's  
21 office that you sent the search to conduct?  
22 **A Correct.**

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1 Q Is that the usual course of conduct, when  
2 a request for each litigation, there was a  
3 litigation -- there were legal advisor, L  
4 attorney, litigation attorney such as yourself,  
5 and then in this case it's just one office, but  
6 multiple contacts in other offices?  
7 MR. PRINCE: Objection. Foundation and  
8 form.  
9 **A Can you clarify that?**  
10 Q In the usual course of conduct -- you  
11 know what? Strike that. I think you've already  
12 answered that.  
13 So James Bair was the attorney assigned  
14 to this request. Is that correct?  
15 **A Correct.**  
16 Q And he was the attorney that you  
17 forwarded the search response that you received,  
18 which was in Exhibit 3?  
19 MR. PRINCE: Objection. Foundation.  
20 Q I can point back to the e-mail on Page 2  
21 from Monica Tillery to James Bair. Attached is  
22 the search response for the subject case.

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1 **A Correct.**  
2 Q Once a search has been returned and  
3 submitted for consultation to your branch chief,  
4 as well as the L attorney, who determines a need  
5 for any additional searches?  
6 **A The branch chief.**  
7 Q The branch chief.  
8 And that's Susan Weetman?  
9 **A Correct.**  
10 Q And who's her boss?  
11 **A At that time Karen Finn -- Karen**  
12 **Finnegan.**  
13 Q Who is Ruby Thomas?  
14 **A I don't know who Ruby Thomas is.**  
15 Q Do you know how many searches were done  
16 in relation to the case that we're talking about  
17 that we just established you were assigned to,  
18 2014-8848?  
19 **A I don't remember how many searches were**  
20 **done.**  
21 MS. BURKE: Are we on Exhibit 5?  
22 COURT REPORTER: Yes.



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1 MS. BURKE: Mark that as Exhibit 5.  
2 (Tillery Deposition Exhibit 5 marked for  
3 identification, retained by counsel.)  
4 MR. PRINCE: I'd just like to note for  
5 the record that the ECF header at the top  
6 indicates that this is a 40-page document, and  
7 that only 14 pages are included. There's no  
8 objection there, I just want it noted.  
9 MS. COTCA: I believe those are just the  
10 exhibits, the remaining pages.  
11 MS. BURKE: Yes. It's -- I apologize.  
12 Q For identification purposes, what you  
13 have in front of you as Exhibit 5 is the  
14 declaration of John F. Hackett regarding  
15 exceptions taken in responsive documents.  
16 Who is John F. Hackett?  
17 A **He's the director of IPS.**  
18 Q And what was his role in requests that  
19 had gone to litigation?  
20 MR. PRINCE: Objection. Foundation.  
21 A **Can you clarify that? What do you ...**  
22 Q What role did Director of IPS John

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1 Hackett play in requests that had gone into  
2 litigation?  
3 A **He signs off on the declarations.**  
4 Q Do you -- and you mentioned earlier that  
5 one of your roles as a litigation analyst was to  
6 draft declarations. Was this the type of  
7 declaration that you would draft?  
8 A **I'd like to clarify something.**  
9 **When I say I drafted -- when I draft**  
10 **declarations, I only draft the search portion of**  
11 **the declaration.**  
12 Q What's the search portion of a  
13 declaration?  
14 A **Administrative section.**  
15 Q Can you point to them?  
16 A **Page 2. Or, actually, clarification, 1**  
17 **and Page 2 of the declaration.**  
18 Q Did you draft the search declaration  
19 draft portion of this declaration?  
20 A **No.**  
21 Q Okay. Thank you.  
22 So in -- you drafted the search

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1 administrative aspects on Page 1 and 2 of  
2 declarations like this.  
3 A **Correct.**  
4 Q Would you assist Mr. Hackett in drafting  
5 the rest of the -- any other portions of the  
6 declaration?  
7 A **No.**  
8 Q How about on the searches themselves or  
9 the offices tasked with the searches?  
10 MR. PRINCE: Objection. Form.  
11 A **Clarify that?**  
12 Q Would you assist Mr. Hackett on portions  
13 relating to the search?  
14 A **I don't understand your question. Assist**  
15 **him with the search?**  
16 Q Assist him on -- in drafting the portions  
17 of the declaration related to the searches.  
18 MR. PRINCE: Objection. Form.  
19 A **I'm sorry, I'm not understanding your**  
20 **question. Assisting him with the drafting of**  
21 **the ...**  
22 Q In providing him with the information

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1 needed to draft other portions of the declaration.  
2 MR. PRINCE: Objection. Foundation.  
3 A **Repeat that again.**  
4 Q In -- again, I'm not trying to slip you  
5 up.  
6 A **No; I'm just trying to understand the**  
7 **question.**  
8 Q We spoke with Mr. Hackett the other day,  
9 and he said that he often is assisted by many  
10 different departments.  
11 MR. PRINCE: Objection. Form.  
12 Q And I'm asking you, were there any other  
13 portions of the declaration that you would have  
14 provided assistance to Mr. Hackett in preparing  
15 the declaration?  
16 A **You're talking about documentation?**  
17 Q Or providing information related to the  
18 search.  
19 A **A copy of the search responses? Are you**  
20 **referring to a copy of the search responses that I**  
21 **would -- that given ...**  
22 Q Is that something you would do?

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1 Would that assist him?

2 **A We would prepare the package for -- for**

3 **Hackett to review and sign.**

4 Q And what would be included in that

5 package?

6 **A Documentation that would include the**

7 **search responses from the components.**

8 Q Anything else?

9 **A Anything else in the case file that may**

10 **be related to the case if he wants to see it. The**

11 **case file may -- may hand over the case file to**

12 **him, to the director.**

13 Q Can I point you to Page 5, Paragraph 11.

14 Paragraph 11 reads "On September 23rd, in

15 furtherance of this process, S/ES-S also searched

16 the state.gov e-mails accounts of three

17 individuals -- Cheryl Mills (Counselor and Chief

18 of Staff to former Secretary Clinton), Jacob

19 Sullivan (Deputy Chief of Staff for policy to

20 former Secretary Clinton), and Huma Abedin (Deputy

21 Chief of Staff for Operations to former Secretary

22 Clinton) -- within the Office of the Secretary."

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1 Were you aware of this secondary search

2 process in this case?

3 **A I don't remember this case. So, no, I**

4 **don't -- I'm not aware of that.**

5 Q In preparing for your deposition today,

6 did you review anything related to the searches

7 done in this case?

8 MR. PRINCE: Objection. Privileged.

9 To the extent that you can answer without

10 disclosing privileged information, you may answer.

11 **A This document, I've recently seen this**

12 **document.**

13 Q You reviewed this document.

14 And it's your testimony that you don't

15 know anything about the information in this

16 document?

17 **A Correct.**

18 Q I'm sorry, I just wanted to clarify.

19 But you did draft the sections in Page 1

20 and 2.

21 MR. PRINCE: Objection. Foundation.

22 **A Not of this declaration.**

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1 Q Not of this declaration.

2 **A I did not -- no.**

3 Q You did not --

4 **A Draft this declaration.**

5 Q Okay. Do you know who did?

6 **A I'm not sure. I don't know who did it.**

7 Q Would it have been the case analyst

8 assigned to this case?

9 **A The norm, the assigned analyst would**

10 **draft this declaration. But in this instance, I'm**

11 **not sure who did it, who drafted the declaration.**

12 **Could have been the branch chief. I'm not sure**

13 **who did it.**

14 Q So if it wasn't the case analyst, it

15 would be the branch chief or -- would it be a

16 colleague?

17 MR. PRINCE: Objection. Form.

18 **A It's possible.**

19 Q Okay. You had mentioned that as part of

20 your daily roles and responsibilities as an

21 analyst, that you -- once you received documents,

22 they would be assigned to a reviewer. Once they

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1 were reviewed, you forwarded to the chief -- your

2 branch chief and/or the L attorney, to clear. And

3 once they were cleared, you would provide them to

4 the requestor or the plaintiff.

5 Is that correct?

6 **A Let me clarify.**

7 **After -- after the clearances are**

8 **obtained, a release -- a release/denial letter is**

9 **prepared, along with the responsive material. And**

10 **it's then forwarded to the L attorney for release**

11 **to the plaintiff.**

12 Q Did you forward any documents to the L

13 attorney for release in this case?

14 **A I don't remember.**

15 MS. BURKE: Are we at Exhibit 6?

16 (Tillery Deposition Exhibit 6 marked for

17 identification, retained by counsel.)

18 MR. PRINCE: This is Exhibit 6? Okay.

19 MS. BURKE: For identification purposes

20 of the record, this document is identified on the

21 bottom as DOS-720.

22 MR. PRINCE: I'd like to note this

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1 appears to be two documents included as one  
2 exhibit. At least two. There are no Bates  
3 numbers on the bottom of anything after Page 2.  
4 MS. BURKE: Are you objecting?  
5 MR. PRINCE: Can you clarify how these  
6 are -- how the two different documents are  
7 connected? Just for the record.  
8 MS. BURKE: Sure. Clarification, this is  
9 Document 720-01 and 02, are the e-mail itself.  
10 The -- they are combined for exhibit purposes.  
11 The attached letter is dated -- this --  
12 it's assigned to this case number, and is the  
13 response the requestor, the plaintiff here,  
14 received from John Hackett on the same date, as  
15 referenced in the e-mail 7/20.  
16 MR. PRINCE: Okay.  
17 MS. BURKE: And the letter did attach the  
18 following -- the attached four documents.  
19 MR. PRINCE: Okay. But you're not  
20 representing that this is the actual attachment to  
21 this e-mail?  
22 MS. BURKE: I am not.

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1 MR. PRINCE: Okay. That's fine.  
2 BY MS. BURKE:  
3 Q If you'll just take a look at the e-mail  
4 that is on top, that's a two-page e-mail,  
5 Ms. Tillery.  
6 It is an e-mail from you dated November  
7 12, 2014, sent to Attorney James Bair, copying  
8 Chief Branch Susan Weetman, IPS Director John  
9 Hackett, and Karen Finnegan, who I believe you  
10 identified as Susan Weetman's superior. The  
11 subject matter being JW TP Production for Today.  
12 The e-mail states "Jamie, As requested,  
13 the four documents are attached. See high side  
14 for the release letter. Thanks, Monica."  
15 Is this an e-mail that you sent to  
16 Attorney James Bair?  
17 **A It appears it is the e-mail that I sent**  
18 **to James.**  
19 Q Regarding the subject matter, JW TP  
20 Production for Today. The four documents are  
21 attached.  
22 Would they be in reference to that

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1 subject matter, JW TP Production for Today?  
2 **A Yes.**  
3 Q And what were the four documents related  
4 to subject matter JW TP Production for Today?  
5 **A Repeat that?**  
6 Q What were the four documents referenced  
7 in your e-mail?  
8 **A I don't know.**  
9 Q Following the e-mail attached to this  
10 exhibit is a letter dated November 12, 2014, for  
11 Case F-2014-8848. I'd like to represent it is a  
12 letter to the plaintiff here, Judicial Watch,  
13 signed by John Hackett, stating that four  
14 documents responsive to Judicial Watch's request  
15 were attached.  
16 MR. PRINCE: Oh, yeah.  
17 Q Oh, it's signed by Lon ...  
18 MR. PRINCE: I'm sorry, did you finish  
19 that last sentence? I'm not...  
20 MS. BURKE: No. I'm sorry. I do see  
21 it's signed for John Hackett, by a -- I don't know  
22 the name.

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1 BY MS. BURKE:  
2 Q Is this -- does this represent the four  
3 documents attached to the e-mail -- or does this  
4 represent the production for today as referenced  
5 in your e-mail to James Bair?  
6 MR. PRINCE: Objection. Form.  
7 **A It appears that the letter is dated**  
8 **November 12. The e-mail is dated November 12.**  
9 **Repeat your question again? You wanted**  
10 **me to confirm that's what it is?**  
11 MS. BURKE: Can you repeat the question.  
12 (Pending question read.)  
13 **A From -- from what I see here, yes.**  
14 Q Do you know if there were any other  
15 productions made in this case, other than what's  
16 referenced as the November 12 production for  
17 today?  
18 **A I don't remember.**  
19 MS. BURKE: Could we take a five-minute  
20 break?  
21 MR. PRINCE: Actually, do you want to  
22 stop for lunch now? It's 12:10.

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1 (A discussion was held off the record.)  
2 VIDEO SPECIALIST: Please stand by.  
3 We are going off the record at 12:11 p.m.  
4 (A recess was taken.)  
5 VIDEO SPECIALIST: Here begins Disk  
6 Number 3 in the videotaped deposition of Monica  
7 Tillery. The time on the video monitor is 1:07  
8 p.m.  
9 BY MS. BURKE:  
10 Q I just want to check back. I think we've  
11 sort of walked around it a little bit.  
12 Who was the reviewer on this case?  
13 A I don't remember.  
14 Q So you had mentioned that you have been  
15 at the State Department for quite a while. Back,  
16 what was it, 2009, did you say?  
17 A I've been with the --  
18 Q No. 2002?  
19 A Yeah, I've been with the department since  
20 January 2002.  
21 Q You were there when Hillary came into  
22 office?

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1 A Yes.  
2 Q What was known -- what did you know about  
3 Hillary's e-mail use, working in IPS branch?  
4 A I don't -- could you clarify that? What  
5 you mean what I know -- I don't -- I don't  
6 understand your question. What did I know about  
7 her e-mail use?  
8 Q Uh-huh.  
9 A I didn't know anything about her e-mail  
10 use at the -- at the time that I was in  
11 litigation.  
12 Q Okay. Did -- were you ever told that she  
13 used e-mail or didn't use e-mail, or was it ever a  
14 topic of discussion?  
15 MR. PRINCE: Objection. Form.  
16 A That wasn't a topic of -- for me.  
17 Q And for purposes of FOIA, did it ever  
18 become an issue or a concern, the lack of e-mails  
19 that would be produced for Mrs. Clinton?  
20 A Can you clarify that? On a particular  
21 case that I was working on?  
22 Q No. Just in general, in -- in IPS. As

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1 far as FOIA requests that were coming in. When  
2 did it become an issue?  
3 A Oh, I don't know.  
4 MR. PRINCE: Object to form.  
5 A I don't ...  
6 Q You don't know.  
7 In 2013 were you a part of a CREW request  
8 that came in regarding Hillary's, Mrs. Clinton's  
9 e-mail address?  
10 A No.  
11 Q Do you recall a case in --  
12 A I would like to -- I would like to  
13 clarify that.  
14 Q Sure.  
15 A I don't remember being part of any FOIA  
16 request. A CREW?  
17 Q Citizens for Responsible Ethics in  
18 Washington.  
19 A I don't remember.  
20 Q How about in 2014; there was a Gawker  
21 case that records came back that would be  
22 potentially responsive showing an e-mail address

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1 for Mrs. Clinton.  
2 Do you recall that? Or did you work on  
3 that case?  
4 A I don't recall working on that case, no.  
5 Q When did you become aware that  
6 Mrs. Clinton communicated by e-mail?  
7 A Can you ...  
8 I don't -- I don't know what you --  
9 repeat that again? When she --  
10 Q When did you become aware that  
11 Mrs. Clinton communicated by e-mail?  
12 A I don't know.  
13 Q Do you know when the State Department  
14 received requests from Mrs. Clinton's former team  
15 regarding any e-mail requests about her e-mails?  
16 MR. PRINCE: Objection. Form.  
17 A I don't know.  
18 Q Were you aware that there were -- that  
19 e-mails of Mrs. Clinton were sent to the Hill in  
20 or around 2014, 2015?  
21 A I don't remember that.  
22 Q You mentioned that you previously were

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1 detailed to Hillary Clinton e-mail detail.  
2 Can you explain that a little bit more?  
3 **A I was -- I was detailed to work on her**  
4 **e-mails. And my responsibility was to get the**  
5 **documents to the offices within the State**  
6 **Department for clearance.**  
7 Q So detailed to work on e-mails. What  
8 does that mean? What e-mails?  
9 **A The 55,000 pages with e-mails.**  
10 Q Okay. And when were you detailed to that  
11 assignment? Or when were you assigned to that  
12 detail?  
13 **A I want to say it was February or March of**  
14 **2015.**  
15 Q And how long did you serve on that  
16 detail?  
17 **A It was over a year.**  
18 Q When did -- when did you know that you  
19 would be transferred to that -- to a specific  
20 detail?  
21 **A I don't know the actual date.**  
22 Q Do you know what the -- any requests that

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1 your detail or your team provided or asked Hillary  
2 to provide parameters for the review they  
3 conducted of her e-mails?  
4 MR. PRINCE: Objection. Foundation.  
5 Form.  
6 **A Can you repeat that?**  
7 Q Are you aware of any requests that the  
8 State Department was asking Hillary and her -- I  
9 want to call them team, about the parameters that  
10 they used in producing records and e-mails to  
11 review?  
12 **A I'm not aware of that, no.**  
13 MS. BURKE: Are we at Exhibit 7?  
14 Would you mark this as Exhibit 7.  
15 (Tillery Deposition Exhibit 7 marked for  
16 identification, retained by counsel.)  
17 Q So what you have in front of you is  
18 what's been marked as Exhibit 7.  
19 For identification purposes, this is  
20 actually a -- well, it's two letters and an actual  
21 production that was -- that plaintiff Judicial  
22 Watch received from the State Department in 2016.

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1 I turn your attention to the e-mails that  
2 are at the back, following the two letters.  
3 Do you know if this -- it's about three  
4 pages of an e-mail chain. Do you know if this was  
5 part of the production from the 2014 search that  
6 you were the case analyst on?  
7 **A It wasn't in litigation at the time this**  
8 **production was sent to you all.**  
9 Q No. And I understand that. That's why  
10 I'm just pointing directly at the -- it's the 2012  
11 e-mails. It's got Cheryl Mills' state.gov e-mail  
12 down at the bottom. And so I'm asking you if this  
13 is a document that came up in the 2014 search in  
14 this case.  
15 **A I don't know.**  
16 Q So I just want to back up a little bit.  
17 You had mentioned that when you were  
18 working on the Hillary Clinton detail or you were  
19 assigned to that detail, your job was to get  
20 documents to offices for clearance.  
21 What does that mean? What does  
22 "clearance" mean?

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1 **A For releaseability.**  
2 Q Can you expand upon that?  
3 **A I'm not a reviewer, so I can't elaborate**  
4 **on -- about the review of the -- of the documents.**  
5 **So my task was to get the documents to**  
6 **the components for them to review for release to**  
7 **the public.**  
8 Q And would they, once they reviewed them,  
9 return them back to you as releaseable or not  
10 releaseable?  
11 **A Return them for their comment, so they're**  
12 **okay for release. Their comments on the**  
13 **documents.**  
14 MS. BURKE: Can we mark this as Exhibit  
15 8.  
16 (Tillery Deposition Exhibit 8 marked for  
17 identification, retained by counsel.)  
18 MS. BURKE: For identification purposes,  
19 it's marked at the bottom as DOS-21. It states at  
20 the top, "Case comments for F-2014-8848."  
21 Q What is this document?  
22 **A This is a printout of case comments from**

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1 **our case -- electronic case tracking system.**  
2 Q And what -- what happens -- what's your  
3 electronic tracking system?  
4 A **It's called F2.**  
5 Q And who has access to that?  
6 A **I don't know who all has access to it. I**  
7 **know I have access to it.**  
8 Q You do?  
9 A **Yes.**  
10 Q And so when you -- with your access,  
11 you're able to enter comments on cases?  
12 A **Yes.**  
13 Q And then are you able to see other  
14 comments from other branches or departments?  
15 A **Yes.**  
16 Q You see the fourth line down, "Per Monica  
17 Tillery case is closed and sent to litigation  
18 office."  
19 Would it then -- since then it was sent  
20 to litigation, would there be comments from you in  
21 these blacked-out spaces?  
22 A **I don't remember.**

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1 Q Are you able to identify any from the  
2 dates in the notes on the side here?  
3 A **Repeat your question again?**  
4 Q Are you able to identify any of the  
5 comments or your own comments by notes that are  
6 marked on the side?  
7 A **If I made a comment, it would be up --**  
8 **under the Updated section of the case comments.**  
9 Q And it would have your name, or ...  
10 A **Yes.**  
11 Q Who is Diamonece Hickson. I'm probably  
12 not saying that the right way.  
13 A **Diamonece Hickson.**  
14 MR. PRINCE: For the record, it's  
15 pronounced Diamonece.  
16 MS. BURKE: Diamonece, I apologize.  
17 A **Oh, Diamonece. Okay.**  
18 Q Who is that?  
19 A **She is an analyst, a litigation analyst.**  
20 Q So on the same level, in your branch?  
21 A **No, she's not in my current branch, no.**  
22 Q But at the time was she?

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1 A **For a short while, while I was there.**  
2 Q Did she work on this case?  
3 A **I don't know. I can't -- I didn't see**  
4 **her work on the case. I don't know.**  
5 Q Was there a point through this case that  
6 you were no longer the case analyst? Did it get  
7 transferred to a colleague, or did you follow it  
8 all the way through?  
9 A **The process once the analyst leave, it**  
10 **will be assigned to another analyst.**  
11 Q Did you leave in the midst of this case?  
12 A **I don't remember.**  
13 Q Did you attend any meetings, biweekly  
14 meetings or weekly meetings, when you were a case  
15 analyst, with regard to your caseload?  
16 A **There will be meetings that we have with**  
17 **the branch chief and the -- and the L attorney.**  
18 Q And that would be Susan --  
19 A **Weetman.**  
20 Q Susan Weetman. And Mr. Bair?  
21 A **Or any other analyst assigned to multiple**  
22 **cases that I worked on would be in it.**

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1 Q Did you attend Benghazi meetings,  
2 Benghazi-specific meetings?  
3 A **I don't remember.**  
4 Q Were there any meetings that were headed  
5 or tasked by IPS Director Mr. Hackett?  
6 MR. PRINCE: Objection. Form.  
7 A **I don't remember.**  
8 Q Is this one of the documents that you  
9 reviewed in preparation for your deposition today?  
10 A **Yes.**  
11 Q Did you review this redacted version or  
12 was it unredacted?  
13 A **Redacted.**  
14 Q It was redacted, just like this?  
15 A **Yes.**  
16 Q Did you ask to see an unredacted version  
17 of it to refresh your recollection?  
18 MR. PRINCE: Objection. Calls for  
19 privileged information.  
20 Instruct you not to answer.  
21 MS. BURKE: Whether she asked to see an  
22 unredacted?

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1 MR. PRINCE: That would be a  
2 communication between an attorney and a client.  
3 MS. BURKE: Okay?  
4 MS. COTCA: For legal advice, seeking  
5 legal advice? I don't know that's going to  
6 communication to seek legal advice.  
7 MR. PRINCE: Okay. To the extent you can  
8 answer that yes or no, you may answer.  
9 To the extent beyond that, we will need  
10 to determine if privilege is involved.  
11 **A No.**  
12 Q Did you ask to -- just as your attorney  
13 has advised you, yes or no. But did you ask to  
14 review any specific documents to prepare for your  
15 deposition today?  
16 **A No.**  
17 Q Besides meeting with your attorneys last  
18 week, did you do anything to refresh your  
19 recollection or adequately prepare for the  
20 deposition?  
21 **A No.**  
22 MR. PRINCE: Objection. Form.

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1 Q I think we're wrapping up. I do actually  
2 want to ask you a couple of questions on some  
3 processing forms.  
4 MS. BURKE: This is Exhibit 8?  
5 COURT REPORTER: Exhibit 9.  
6 MS. BURKE: Exhibit 9.  
7 (Tillery Deposition Exhibit 9 marked for  
8 identification, retained by counsel.)  
9 Q For identification purposes, what's been  
10 marked -- in front of you is marked as Exhibit 9  
11 is a series of forms or maybe part of a tracking  
12 system.  
13 Do you recognize any of this?  
14 **A I don't remember this.**  
15 Q You don't remember --  
16 **A Yeah.**  
17 Q You have -- you haven't seen anything  
18 like this when you were a litigation analyst --  
19 MR. PRINCE: Objection. Form.  
20 Q -- or a case analyst?  
21 MR. PRINCE: Oh, apologies.  
22 **A Repeat your question again?**

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1 MS. BURKE: Can you repeat the question.  
2 (The Reporter read the record as follows:  
3 "QUESTION: You haven't seen anything  
4 like this when you were a litigation analyst --  
5 COURT REPORTER: And then there was an  
6 objection.  
7 " -- or a case analyst?")  
8 **A Vaguely remember. This is from our old  
9 system. I vaguely remember these screens.  
10 They're sort of familiar to me.**  
11 Q Okay. So this was an older system.  
12 **A Yes.**  
13 Q How -- how old, do you --  
14 **A Oh, I don't know.**  
15 Q What was the purpose of this?  
16 **A It's an electronic case tracking system  
17 as well.**  
18 Q On this second page, it's -- was this --  
19 strike that.  
20 Is this where anybody would be able to  
21 insert comments and track the case?  
22 **A I don't remember the setup of this**

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1 **system, so I don't -- I don't remember.**  
2 Q But on this last page there seems to be a  
3 report. Is this a way that you could see how many  
4 searches were pulled or --  
5 **A Which page are you referring to?**  
6 Q I'm sorry, not the last page. The  
7 second-to-last page.  
8 No. The third-to-last page, I suppose.  
9 MR. PRINCE: Can you clarify, just to  
10 make sure we're all on the same page, like, read  
11 the --  
12 MS. BURKE: Sure. At the top it says,  
13 C18753923.  
14 **A Okay.**  
15 MR. PRINCE: They all seem to say that.  
16 MS. BURKE: Oh.  
17 MR. PRINCE: I just want to make sure  
18 we're on the right one.  
19 MS. BURKE: It has the line through it.  
20 Request Status Report seems to be the title of it.  
21 **A Can you repeat your question?**  
22 Q So what -- what occurred on this request

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1 status report?  
2 MR. PRINCE: Objection. Form.  
3 **A I don't remember what occurred.**  
4 Q How about on the next page; it says Case  
5 Comments.  
6 Is this similar to Exhibit 8 that I had  
7 shown you, is that Case Comments form?  
8 **A Printout from that system, Case Comments,**  
9 **yes.**  
10 Q Okay. I was just curious what system  
11 this was.  
12 MS. BURKE: I have just one last exhibit,  
13 Exhibit 10.  
14 (Tillery Deposition Exhibit 10 marked for  
15 identification, retained by counsel.)  
16 MS. BURKE: For identification purposes,  
17 at the top it says Office of Information Programs  
18 and Services. It seems to be a flow chart.  
19 Q Which branch did you work in in 2015,  
20 2014?  
21 **A The branch would be Litigation and**  
22 **Appeals Branch.**

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1 Q And who was head of that?  
2 **A Susan Weetman.**  
3 Q Okay. And then above that is Information  
4 Access Program Branch. Who was the branch chief  
5 of that branch?  
6 **A I don't recall. I don't remember at that**  
7 **time.**  
8 Q How about Programs and Policies Division?  
9 MR. PRINCE: Objection. I think this is  
10 getting beyond the scope.  
11 MS. BURKE: Okay.  
12 MS. COTCA: We're just trying to  
13 understand.  
14 MS. BURKE: Who all the players are.  
15 MS. COTCA: She testified about where  
16 people fell within -- within the different  
17 branches of the State Department. And for  
18 somebody who has never worked at the State  
19 Department, we just thought it would be easier if  
20 we can have her identify the individuals on this  
21 chart.  
22 MR. PRINCE: Okay. For that purpose,

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1 that's fine.  
2 MS. COTCA: Yes.  
3 **A Repeat your question?**  
4 Q So who was the superior to Susan Weetman  
5 in the Information Access Program Branch?  
6 **A Karen Finnegan.**  
7 Q How about Programs and Policies Division?  
8 **A That would be Karen Finnegan.**  
9 Q Was there anyone between her, Susan  
10 Weetman, and Karen Finnegan?  
11 **A No.**  
12 Q Do you know who the FOIA program manager  
13 was?  
14 **A I don't remember at that time.**  
15 **Mary Ann Maham.**  
16 MS. BURKE: If we can just get five  
17 minutes, we can clean up and make sure we've  
18 covered everything.  
19 VIDEO SPECIALIST: Please stand by.  
20 We are going off the record. The time is  
21 1:37 p.m.  
22 (A recess was taken.)

92

1 VIDEO SPECIALIST: We are back on the  
2 record. The time is 1:43 p.m.  
3 BY MS. BURKE:  
4 Q We're just about wrapping up. I just  
5 wanted to clarify.  
6 The -- the reviewer who would -- who you  
7 then pass on any responsive records, what  
8 department would they be in?  
9 **A Statutory Compliance and Research**  
10 **Division.**  
11 Q So who would assign them?  
12 **A Can you clarify that? Who would assign**  
13 **them?**  
14 Q Who would assign them to be the reviewer  
15 under cases?  
16 **A In litigation?**  
17 Q Well, no. I guess that's -- that's my  
18 question.  
19 So it would go from your litigation  
20 branch, to the Statutory Compliance and Research  
21 Division?  
22 How does that get assigned? By Susan



93	1 Weetman or by another branch chief? 2 <b>A The analyst. We would borrow their</b> 3 <b>reviewers.</b> 4 Q So you would assign the reviewer -- 5 <b>A Correct.</b> 6 Q -- your case? 7 <b>A Yes.</b> 8 Q Who would -- and you don't remember the 9 reviewer on this case? 10 <b>A No, I don't.</b> 11 Q Let me just ask you, besides counsel, 12 besides speaking with counsel last week, have you 13 spoken with anyone else about your testimony 14 today? 15 <b>A No.</b> 16 Q And on your own did you review anything 17 in preparation for your testimony today? 18 <b>A No.</b> 19 Q To the best of your knowledge, have your 20 answers today been -- all been truthful? 21 <b>A Yes.</b> 22 <b>Can I clarify something?</b>	95	1 VIDEO SPECIALIST: Please stand by. 2 THE WITNESS: I'm sorry. I do have one 3 thing. I just thought about something. 4 The branch chief for the IA access 5 branch, I believe her name -- could have been 6 Darlyce Eley. 7 MS. BURKE: Thank you. 8 VIDEO SPECIALIST: Please stand by. 9 This marks the end of the deposition of 10 Monica Tillery. We are going off the record at 11 1:48 p.m. 12 THE COURT REPORTER: Do you guys -- 13 MR. GARDNER: The same. 14 COURT REPORTER: The same delivery, 15 daily? 16 MR. GARDNER: Everything the same, 17 transcript daily. 18 (Off the record at 1:48 p.m.) 19 20 21 22
94	1 Q Sure. 2 <b>A I did tell my branch chief I was coming</b> 3 <b>here.</b> 4 Q Okay. 5 <b>A Okay.</b> 6 Q Did you tell them what you would be 7 testifying about? 8 <b>A No.</b> 9 MS. BURKE: I think that's all I have. 10 MR. PRINCE: Can you give us just a few 11 minutes. 12 (A discussion was held off the record.) 13 VIDEO SPECIALIST: Stand by. 14 We are going off the record at 1:45 p.m. 15 (A recess was taken.) 16 VIDEO SPECIALIST: We are back on the 17 record. The time is 1:47 p.m. 18 MR. PRINCE: Okay. We don't have any 19 questions. I just want to note once more for the 20 record that we do reserve the right to read and 21 sign. And we're not invoking the classified 22 exemption.	96	1 ACKNOWLEDGMENT OF DEPONENT 2 I, MONICA TILLERY, do hereby acknowledge 3 that I have read and examined the foregoing 4 testimony, and the same is a true, correct and 5 complete transcription of the testimony given by 6 me, and any corrections appear on the attached 7 Errata sheet signed by me. 8 9 _____ 10 (DATE) (SIGNATURE) 11 12 13 14 15 16 17 18 19 20 21 22

Transcript of Monica Tillery  
Conducted on June 3, 2019

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 3rd day of June, 2019.

14

15 My commission expires:

16 September 14, 2023

17

18  

19 -----

20 NOTARY PUBLIC IN AND FOR THE

21 DISTRICT OF COLUMBIA

22

A			
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