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Transcript of Jonathon David Wasser

Date: June 6, 2019

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

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Transcript of Jonathon David Wasser
Conducted on June 6, 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 JONATHON DAVID WASSER	11 ON BEHALF OF DEFENDANT:
12 Washington, DC	12 STEPHEN M. PEZZI, ESQUIRE
13 Thursday, June 6, 2019	13 JOSHUA E. GARDNER, ESQUIRE
14 10:01 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.: 242899	20
21 Pages 1 - 182	21
22 Reported by: Debra A. Whitehead	22
2	4
1 Videotaped Deposition of JONATHON DAVID WASSER,	1 A P P E A R A N C E S C O N T I N U E D
2 held at the offices of:	2 ON BEHALF OF DEFENDANT:
3	3 ELIZABETH GROSSO, 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) 647-6371
8 (888) 433-3767	8
9	9 ALSO PRESENT:
10	10 JEREMY DINEEN, Video Specialist
11	11
12 Pursuant to notice, before Debra A. Whitehead,	12
13 an Approved Reporter of the United States District	13
14 Court and Notary Public of the District of Columbia.	14
15	15
16	16
17	17
18	18
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9

1 read and sign the transcript.
2 MR. GARDNER: Josh Gardner, with the
3 United States Department of Justice, on behalf of
4 defendant.
5 MR. PRINCE: Robert Prince, from the
6 Department of Justice, on behalf of defendant.
7 MS. GROSSO: Elizabeth Grosso, from the
8 Department of State, for the defendant.
9 VIDEO SPECIALIST: Thank you.
10 The court reporter today is Debbie
11 Whitehead, representing Planet Depos.
12 Would the reporter please swear in the
13 witness.
14 JONATHON DAVID WASSER,
15 having been duly sworn, testified as follows:
16 EXAMINATION BY COUNSEL FOR PLAINTIFF
17 BY MS. BURKE:
18 Q Good morning.
19 A **Good morning.**
20 Q Could you please state your name and
21 spell it, for the record.
22 A **Jonathon David Wasser. J-O-N-A-T-H-O-N,**

10

1 **D-A-V-I-D, W-A-S-S-E-R.**
2 Q Thank you, Mr. Wasser. And do you know
3 why you're here today?
4 A **Yes.**
5 Q Why?
6 A **A deposition for a FOIA case with**
7 **Judicial Watch.**
8 Q What FOIA case?
9 A **I don't know the number.**
10 Q Do you know the subject matter of the
11 FOIA case?
12 A **Roughly, yeah.**
13 Q What is that?
14 A **Regarding -- well, I've seen a lot of**
15 **information. I'm not sure which exactly the --**
16 **the final case is about.**
17 Q What do you mean, you've seen a lot of
18 information on it?
19 A **Well, I believe this -- the -- the**
20 **deposition is going to be about a lot of**
21 **information spanning a large segment of time.**
22 Q And so what is your understanding about

11

1 the information and the span of time?
2 MR. PEZZI: Objection. Form.
3 A **It's -- it's regarding a FOIA case that**
4 **was brought to the State Department that then went**
5 **into litigation. I'm not sure of the entire**
6 **nature of everything, but I'm happy to talk about**
7 **what I know with questions.**
8 Q Sure. And that's why -- that's why
9 you're here today, and we appreciate that.
10 So the FOIA case that you referenced that
11 was brought into litigation, what FOIA case, or
12 what is the subject matter of that FOIA case?
13 MR. PEZZI: Objection. Form.
14 A **Can you provide me information about what**
15 **the case is?**
16 Q I'm -- I'm happy to do that. I'm trying
17 to get a sense of what your knowledge is as you
18 came in here today.
19 MR. PEZZI: Objection. Form.
20 Q Let me back up a little bit.
21 So have you ever been deposed before?
22 A **No.**

12

1 Q So I'm just going to go over a couple of
2 rules. The court reporter just issued the -- an
3 oath, which you have -- that you will testify here
4 truthfully, honestly, accurately. And that is,
5 obviously, what we would expect.
6 Because there is the videographer and the
7 court reporter, it is very important that the
8 record is clear and that I don't speak over you,
9 you don't speak over me. If we just give each
10 other a turn to ask the question fully, I will
11 make sure that I don't speak over you when you are
12 answering questions fully.
13 A **Thank you.**
14 Q If there is any -- at any point that I am
15 not clear in what I'm asking you, please don't
16 hesitate to ask me to either repeat the question
17 or I'm happy to rephrase it, expand upon the
18 question itself so that you have an understanding
19 of what I'm looking for.
20 During -- throughout this process, this
21 is an informal sort of court hearing. So your
22 attorneys do have the right and will multiple

13
1 times object.
2 They are noting their objection on the
3 record. That does -- unless your attorney does
4 instruct you not to answer for a privilege or any
5 other reason, you may proceed after the objection
6 has been noted on the record and answer the
7 question that has been asked.
8 **A Okay.**
9 Q And if at any time you need a break or
10 you want to consult with your attorneys, please
11 just let us know. We'll -- we won't go too long
12 without, you know, taking a little bit of a break.
13 And as I said, you are under oath, so you
14 do have an obligation to provide truthful and
15 accurate testimony. The base of an incomplete
16 answers amount to essentially a no response. And
17 if we're unable to get responses or get things
18 clarified, then -- then after this deposition
19 we'll have to see what the next steps are.
20 So I ask that you answer as completely as
21 you can. I'm not asking you to guess. But within
22 your realm of knowledge, answer the question to

14
1 the best of your ability.
2 **A I will.**
3 Q And along those lines, I know that as you
4 just mentioned, it is a case that is a FOIA case.
5 And you may have read or seen that there are a lot
6 of components involved.
7 This is a 2013 FOIA request that was sent
8 to your office. And so I know it's been a little
9 bit of time. So sometimes it's difficult to
10 remember things.
11 **A Uh-huh.**
12 Q And certainly if you don't remember, you
13 don't recall anything, you can put that out there.
14 But I ask that you, to the best of your ability,
15 answer the question as specific as you can. Or,
16 if need be, as general as you can.
17 Again, I'm not asking you to guess or to
18 speculate on anything.
19 **A Uh-huh.**
20 Q But if it's something that you have a
21 general knowledge of but you don't know the
22 specifics, please provide that general knowledge,

15
1 and -- and you can qualify it as based on your
2 knowledge.
3 But, like I said, we are here to get
4 things on the record. And you are here to answer
5 and clarify some questions and information that
6 was out there.
7 And I do have to correct myself. I did
8 say 2013. And I believe it was a 2014 FOIA
9 request. May 13, 2014.
10 And along those lines, as you have asked,
11 the specific FOIA request that this case revolves
12 around is a May 13, 2014, Judicial Watch request
13 for talking points and communications surrounding
14 the attacks on Benghazi.
15 **A Uh-huh.**
16 Q It is a FOIA request that went into
17 litigation. And it has proceeded, the case
18 itself, into where we are today, which is this
19 court-ordered discovery.
20 And you are here before us because as the
21 judge in the case reviewed some of the documents
22 and arguments that were made by your attorneys and

16
1 the plaintiff, you were identified as somebody
2 that would have knowledge of potentially e-mail
3 addresses for Hillary Rodham Clinton -- I'm going
4 to call her Mrs. Clinton -- in two thousand -- as
5 early as two thousand -- or August 2014.
6 As well I believe you -- you are
7 identified as the individual that did the search
8 for the FOIA request itself for the Office of the
9 Secretary at that time, for the FOIA request.
10 Before you came here for your deposition,
11 did you review any documents or prepare anything
12 to refresh your recollection or familiarize
13 yourself so that you were adequately prepared for
14 this deposition?
15 MR. PEZZI: Objection. Form.
16 And you can answer yes or no to the
17 question of whether or not you reviewed any
18 documents in preparation for the deposition.
19 **A Outside of review with counsel, no.**
20 Q Outside, no.
21 And so you said "outside of review with
22 counsel." So you did meet with your attorneys in

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17	<p>1 preparation for today?</p> <p>2 A Yes.</p> <p>3 Q And there were documents that you did</p> <p>4 review?</p> <p>5 A Yes.</p> <p>6 Q And when did you meet with your attorneys</p> <p>7 in preparation for your testimony today?</p> <p>8 A I believe the first and the most</p> <p>9 significant time was about a week ago.</p> <p>10 Q And so have you met with them on multiple</p> <p>11 occasions?</p> <p>12 A There was one phone call.</p> <p>13 Q And so how long did you spend with your</p> <p>14 attorneys preparing for today's deposition?</p> <p>15 A About a day's worth of hours. Eight</p> <p>16 hours.</p> <p>17 Q And, again, in preparation for today's</p> <p>18 deposition testimony, did you review any of your</p> <p>19 own e-mails or any of your own documents, outside</p> <p>20 of meeting with your counsel?</p> <p>21 A No.</p> <p>22 Q Given the roughly eight hours that you</p>	19	<p>1 lawsuit that was brought in 2014 was a FOIA</p> <p>2 request, specifically for copies of any updates or</p> <p>3 talking points given to Ambassador Rice by the</p> <p>4 White House or federal agency concerning,</p> <p>5 regarding, or related to the September 11, 2012,</p> <p>6 attack on the U.S. consulate in Benghazi.</p> <p>7 That was a FOIA request that was</p> <p>8 submitted to the Department of State. And having</p> <p>9 not received any documents, it did go -- Judicial</p> <p>10 Watch, the plaintiff here, filed suit, and it went</p> <p>11 into litigation.</p> <p>12 MR. PEZZI: Objection. Form.</p> <p>13 Q Are you familiar with that, with the FOIA</p> <p>14 request that I just described?</p> <p>15 A Not specifically.</p> <p>16 Q Can you explain what -- what do you mean,</p> <p>17 you generally are aware of it?</p> <p>18 A The topic is something I am aware of</p> <p>19 happening. And certainly I recall having seen the</p> <p>20 subject in FOIAs, but not specifically in this</p> <p>21 Judicial Watch case.</p> <p>22 Q Are you -- are you familiar with Judicial</p>
18	<p>1 spent prepare -- preparing for today's deposition,</p> <p>2 do you feel adequately prepared that you will be</p> <p>3 able to accurately and honestly answer the</p> <p>4 questions that I have for you?</p> <p>5 MR. PEZZI: Objection. Form.</p> <p>6 A Yes.</p> <p>7 Q Do you know who Clarence Finney is?</p> <p>8 A Yes.</p> <p>9 Q Who is he?</p> <p>10 A He is -- he's been my manager for several</p> <p>11 years.</p> <p>12 Q Is he still currently your manager?</p> <p>13 A Yes.</p> <p>14 Q Are you aware that Clarence, Mr. Finney,</p> <p>15 was deposed in this same case two days ago here</p> <p>16 today?</p> <p>17 A Yes.</p> <p>18 Q I'm sorry, not today, this week. Yes.</p> <p>19 And did you have a chance to discuss his</p> <p>20 deposition with him?</p> <p>21 A No.</p> <p>22 Q And again as I mentioned, the -- the</p>	20	<p>1 Watch?</p> <p>2 A Yes.</p> <p>3 Q How?</p> <p>4 A Through FOIA, more specifically. Also,</p> <p>5 having now lived in DC, I read the news a lot and</p> <p>6 I see Judicial Watch come up.</p> <p>7 Q I'm going to get just a little bit of</p> <p>8 background so that we have an understanding of</p> <p>9 your experience and your expertise in your</p> <p>10 position at the Department of State.</p> <p>11 How long have you worked at the</p> <p>12 Department of State?</p> <p>13 A I started at the Department of State in</p> <p>14 around September of 2010. And I started in my</p> <p>15 current position around, again, September of 2011.</p> <p>16 Q And what was the position that you</p> <p>17 started in 2010?</p> <p>18 A I started under an internship that then</p> <p>19 turned into a full-time position in I&R, which is</p> <p>20 the intelligence and research side of the house.</p> <p>21 Q I&R?</p> <p>22 A I&R.</p>

21

1 Q And then around about a year later in
2 September of 2011, you moved into your current
3 position?
4 A **Correct.**
5 Q And what is your current position?
6 A **So my current position has evolved over**
7 **the years.**
8 **Right now it's strictly working on FOIA**
9 **and search requests for our principals on the**
10 **seventh floor of the State Department.**
11 Q And that is your current position?
12 A **Yes.**
13 Q What was it previously?
14 A **It was essentially the same thing. It**
15 **just evolved to being more specific to FOIA and**
16 **other search requests.**
17 Q What do you mean by "other search
18 requests"?
19 A **Congressional. If we have to do**
20 **interagency DOJ searches, DOD searches, any --**
21 **anything. If it has to do with the seventh floor,**
22 **I'm involved with it.**

22

1 Q And can you elaborate, what is the
2 seventh floor?
3 A **The seventh floor would include the**
4 **Secretary's office, the Deputy Secretary, and a**
5 **few other of the higher-level offices. We**
6 **basically help them get the searches done. And if**
7 **we can do it on our own, we will.**
8 Q And when you say "we," who is "we"?
9 A **Myself, pretty much. And especially the**
10 **scope of this case, it was me back then.**
11 Q And you said that it evolved, your
12 position evolved into what it is today, which is
13 strictly FOIA, as well as congressional
14 interagency requests for principals.
15 What was it previously?
16 MR. PEZZI: Objection. Form.
17 A **You mean the additional?**
18 Q Yes.
19 A **It -- it wasn't too much more. It was a**
20 **very select few type of documents that I would log**
21 **into our system. That -- very small things,**
22 **not -- nothing really in particular. It's just**

23

1 **that the scope of what I did became so much**
2 **greater doing FOIA, that we had to reevaluate the**
3 **job and make it solely on FOIA and other search**
4 **requests.**
5 Q And what -- when did it evolve into a
6 concentration on FOIA?
7 A **Around 2015 we got a huge amount of FOIA**
8 **requests that year, to the point where I couldn't**
9 **do -- I couldn't process all those cases on my own**
10 **and still do some of the other duties.**
11 Q And so you said that essentially you
12 handle FOIA requests in that. Do -- are there
13 others in your office that -- that work on FOIA
14 requests?
15 A **In my specific office at that time,**
16 **again, no. It would have been me and Clarence**
17 **Finney.**
18 Q So when you say "at that time," you're
19 speaking about the 2014 --
20 A **Yes.**
21 Q -- early 2015 time period of this
22 specific FOIA request?

24

1 A **Yes.**
2 Q Right now are -- is it still just you and
3 Clarence Finney?
4 A **No.**
5 Q Who -- who else is in your office?
6 A **We have several other people in the**
7 **office now.**
8 Q How many?
9 A **Under eight. Maybe six or seven.**
10 **Although recently we had up to 35 during**
11 **the FOIA surge. So we've -- we've had a**
12 **fluctuating number. But it's much greater now**
13 **than it used to be, obviously.**
14 Q And so I'm going to take us back to --
15 and that is the time period that my questions
16 will -- are relevant to, is that 2014 time period
17 when the request was made, early 2015.
18 And I think you testified it was yourself
19 and Clarence Finney in the office?
20 A **Yes.**
21 Q And what was your title and what was
22 Mr. Finney's title?

25
1 **A Clarence Finney at the time I believe was**
2 **the director of the records unit, the Executive**
3 **Secretariat. Correspondence and records. That's**
4 **what it was. So he was the director at the time**
5 **of that. And I was the management analyst at that**
6 **time in that office.**
7 Q What did a management analyst do at that
8 time, in that office?
9 **A FOIA.**
10 Q Can you expand?
11 **A Yeah. When we would receive a FOIA**
12 **request from A bureau -- do you know A bureau?**
13 Q I believe somebody identified it as the
14 Bureau of Administration?
15 **A Correct.**
16 Q Okay.
17 **A So when a FOIA request comes into the**
18 **State Department through A bureau, if it was**
19 **deemed that we would have equity in it, meaning,**
20 **again, anyone in the Secretary's office, Deputy,**
21 **some of the other principals, or ourselves because**
22 **we have several databases as well, we would look**

26
1 **for any relevant records for that FOIA request.**
2 Q And correct me if I'm wrong. So I think
3 you just identified that FOIA requests might be
4 tasked to your office, to you, that are related to
5 the Secretary's office, you said other principals,
6 as well as yourself?
7 MR. PEZZI: Objection. Form.
8 **A Yes. So our office has access to**
9 **databases that we wouldn't ask those front offices**
10 **to search through, because we have great -- better**
11 **access to it than they do.**
12 Q And what databases are those?
13 **A At that time I would have to see what our**
14 **search criteria sheet was. I don't recall.**
15 Q And we'll step back. I just want to
16 flesh this out a little bit.
17 And then you said as well you would do
18 searches for the Secretary's office?
19 **A Well, not entirely. If there's a reason**
20 **that we feel they would have things that we do not**
21 **have, we would task them.**
22 **But, again, at that time I don't recall**

27
1 **exactly how we handled this case.**
2 Q And what types of things would they have
3 that you don't?
4 **A At that time or currently?**
5 Q At that time.
6 **A Paper copies of things, stuff in a safe.**
7 Q And who would -- who would make that
8 determination?
9 MR. PEZZI: Objection. Form.
10 **A That would have been made by Clarence. I**
11 **mean, again, essentially as the management analyst**
12 **I would have looked through the things that I had**
13 **access to. And from there, I don't know.**
14 Q And how would that be tasked?
15 **A To who?**
16 MR. PEZZI: Objection to form.
17 Q To the Secretary's office.
18 **A I don't know. At that time, I don't**
19 **know.**
20 Q Bringing -- bringing you a little bit
21 forward to current time.
22 You have been in the office and in your

28
1 role essentially since 2011?
2 **A Uh-huh.**
3 Q And you said that the office has grown a
4 little bit.
5 Do you oversee any staff or do you manage
6 others in the role of FOIA requests or records
7 management?
8 **A Not directly.**
9 Q Indirectly?
10 **A I -- I have people that I assist to get**
11 **their work done. And it channels through me to**
12 **Clarence. But I don't deal with most of the**
13 **management roles that a manager would do over**
14 **them.**
15 Q And in -- backing up just a little bit.
16 You had mentioned that the number of individuals
17 in your office has fluctuated. When that occurs,
18 is there -- and -- and new people come on, is
19 there any kind of training or -- I suppose --
20 that's my question. Is there any training that
21 you under -- you would take on for those coming in
22 to assist with your FOIA searches?

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1 A Yes, there would be.
 2 Q What kind of training?
 3 A We would train people to use every one of
 4 the systems. When -- the databases that we have.
 5 And actually, a lot of -- there is a lot
 6 of training that goes into it; understanding not
 7 only what the documents are in it, thinking in the
 8 mindset of each individual system what kind of
 9 things you would find, and most importantly how to
 10 extract records out of each system.
 11 Q And who does that training?
 12 A Over the years I've done most of it, but
 13 there -- we have other colleagues as well that
 14 have been briefed that can do the training as
 15 well.
 16 Q So you have been in -- in your role and
 17 in this position in this office for about eight,
 18 nine years?
 19 A Eight years, give or take.
 20 Q Do you consider that you have a
 21 substantial expertise in the area -- in the area
 22 of what you do in your position?

30

1 MR. PEZZI: Objection. Form.
 2 A Yeah.
 3 Again, we are talking about the present.
 4 Correct?
 5 Q Yes.
 6 A Yes.
 7 Q If you could walk me through a little bit
 8 what the FOIA search process is.
 9 You said when a bureau or the Bureau of
 10 Administration sends a FOIA request to your
 11 office, what is the process? And I actually am
 12 specifically talking about in 2014, 2015, what was
 13 the process when it was yourself and Clarence,
 14 when you would receive a request from the Bureau
 15 of Administration?
 16 A Okay. You did start saying, the FOIA
 17 search. Did you say "FOIA search"?
 18 Q I did.
 19 A Okay. So the FOIA search was a more
 20 recent thing. That was 2017. A FOIA -- just the
 21 standard FOIA process, is that what you're asking?
 22 Q Yes.

31

1 A In 2014, I could think of two ways -- I
 2 mean, again, I don't want to speak on behalf of A
 3 bureau, because internally there I don't actually
 4 know how they process things.
 5 But once it comes to us, I believe there
 6 were two ways we would get it. One was either in
 7 hard copy -- again this is 2014. We would get a
 8 hard copy of the FOIA request, or I don't know if
 9 they were doing e-mail yet. That's how we do it
 10 now. Or they would send us an e-mail.
 11 So after we receive it, we would order
 12 them chronologically and do first in, first out.
 13 So if we had a hundred cases, it would take me a
 14 hundred to get to the new one.
 15 And then once we got to it, we would
 16 search through all our relevant databases. We
 17 would -- Clarence and I a lot of times would think
 18 where else records could be. And then we would
 19 close out the FOIA case and send it back to A
 20 bureau.
 21 Q And how long would this process generally
 22 take?

32

1 A So, again, strictly in our office?
 2 Q Uh-huh. Yes.
 3 A And again, do we mean strictly when I
 4 start working on it, or how long it could take
 5 with a backlog?
 6 Q When you start working on it.
 7 A Okay.
 8 Q A specific request.
 9 A So if I start working it, let's say at 8
 10 a.m., it might take within an hour for each of the
 11 databases that I look at. It might go faster,
 12 depending on search terms and how elaborate or
 13 simple the search is.
 14 And then I would write up the memo. I
 15 would compile all the records I found. At that
 16 time we were also printing everything, so it would
 17 have taken longer. And then it would -- I would
 18 deliver it to Clarence Finney, who was in an
 19 office next to me.
 20 Q And who determined the search parameters
 21 for a request that came in?
 22 MR. PEZZI: Objection. Form.

33

1 A A lot of time it was collaboration
2 between Clarence and I, if it was clear enough to
3 us what they were looking for.
4 If they made a very vague response -- or
5 request, if it was something so gargantuan that we
6 just felt like it would have taken us years to do,
7 we would discuss with A bureau about coordinating
8 with the requestor to narrow or redefine the
9 scope.
10 But generally if it was simple enough, I
11 would do that on my own, and then Clarence would
12 have final review of what took place.
13 Q And when you closed it out and it went to
14 Clarence, was it ever -- strike that.
15 And so you said that in 2017 they started
16 a FOIA search. What -- what's the difference
17 between the FOIA search and what you just
18 described?
19 A Surge.
20 Q Surge.
21 A Surge. Like an electrical surge.
22 Q Oh. What is that?

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1 A In 2017 -- and, again, I don't want to
2 speculate, because I don't know all the details --
3 there was a huge backlog of FOIAs that hadn't been
4 processed with A bureau, and the Secretary
5 Tillerson demanded a FOIA surge.
6 So we got a huge group of people
7 together. That's when I said our office went up
8 to about 30. And we ended up processing 1200 FOIA
9 cases in a year. Which is a lot more than we
10 would normally have the capacity to do.
11 Q And that FOIA surge, was that temporary?
12 MR. PEZZI: Objection. I mean, I have
13 let this go for a little while. But, I mean, this
14 is all well beyond the scope of the discovery
15 ordered in this case, and certainly with respect
16 to Mr. Wasser.
17 A A lot of this information is public, I
18 guarantee you that.
19 Q Sure. And I appreciate you answering my
20 questions. We don't -- I -- we don't handle those
21 types of things, and ...
22 I suppose gearing back to this case in

35

1 2014. How many searches did you undertake
2 specific to a Benghazi request?
3 A I have no idea.
4 MR. PEZZI: Objection. Form.
5 A There were several, but I don't -- I
6 don't know a number at all.
7 Q And you said sometimes that you would
8 need to task a search to the Secretary's office or
9 other principals. In the Secretary's office
10 themselves at this time, who was your point of
11 contact?
12 A So, actually, I -- as I stated, I
13 wouldn't, actually, do the tasking. I would
14 report everything to Clarence, and then he would
15 take it from there.
16 So I never, actually, would have done
17 tasking at that time to people in the front
18 offices.
19 Q Do you know who the point of contact was
20 for the Secretary's office --
21 A No.
22 Q -- at that time?

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1 A At that time, no.
2 Q Were there ever cases, FOIA searches or
3 requests that had come in to you, that once you
4 closed it out and sent it to Clarence, it was
5 returned to you for any supplemental searching?
6 MR. PEZZI: Objection. Form.
7 A Returned in what capacity?
8 Q I suppose sent back to you to do
9 additional search?
10 A We've had several cases like that, yes.
11 Q Is that routine or is it more of a -- is
12 it a rare instance?
13 A It's more rare. Being that we do process
14 so many cases, I -- I wouldn't want to quantify
15 what "rare" is or what ...
16 Q And you mentioned that you also handle
17 congressional and interagency requests?
18 Is that correct?
19 A Only in capacity of the seventh floor.
20 Or if my office has records that we were tasked
21 to -- to perform a search for.
22 Q And did you handle those in 2014?

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1 A Yes.
2 Q And how did they differ from FOIA
3 requests?
4 A **From my perspective, they really don't**
5 **differ. It's a request for information, and I**
6 **find it.**
7 MS. COTCA: I'm sorry, I couldn't hear.
8 What was the last part?
9 THE WITNESS: I said that it's
10 essentially the same as a FOIA request. We're
11 tasked for information, and we find them.
12 Q And you said that there were several
13 databases that you would search when tasked with a
14 FOIA request or a congressional inquiry request.
15 What are those database -- or what were
16 those databases in 2014?
17 MR. PEZZI: Objection. Form.
18 A **I actually don't recall what we had in**
19 **2014, but I know it would have been included in**
20 **our search memo and criteria.**
21 MS. BURKE: I'm going to mark this as
22 Exhibit 1.

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1 (Wasser Deposition Exhibit 1 marked for
2 identification, retained by counsel.)
3 Q And what's just been marked as Exhibit 1
4 is identified at the bottom by DOS-77. There are
5 eight pages. And this was produced to us in
6 discovery by your attorneys in this case.
7 And if you can take a look through it
8 just for a minute and we can walk through it a
9 little bit.
10 A Okay.
11 Okay.
12 Q Do you recognize any of the pages --
13 A Yes.
14 Q -- in Exhibit 1 that I just placed in
15 front of you?
16 A **Well, I wouldn't say I actually recall**
17 **this exactly. But this appears to be a response**
18 **from our office from 2014.**
19 Q Response with respect to the case, the
20 FOIA request that I'm talking about today?
21 MR. PEZZI: Objection. Form.
22 A **The FOIA request that's under here. So,**

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1 **yes, in response to 2014-08848.**
2 Q And you're pointing to what's located
3 at --
4 A **Page 6.**
5 Q Identified DOS 77-6, Page 6?
6 A **Yes.**
7 Q And what is that?
8 A **What is on Page 6?**
9 Q Yes.
10 A **This is a FOIA request from Judicial**
11 **Watch.**
12 Q Related to what?
13 A **Identified in Points 1 and 2, a request**
14 **for talking points.**
15 Q And I'm going to represent to you that
16 this is the FOIA request from May 13, 2014, that
17 is the subject of this litigation.
18 A **Okay.**
19 Q Is that fair?
20 A **Certainly.**
21 MR. PEZZI: Objection.
22 Q If we can go back. Can you please tell

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1 me -- can you please tell me about Page 1.
2 MR. PEZZI: Objection. Form.
3 A **What would you like to know specifically?**
4 Q What is this?
5 A **This would have been a cover memo to the**
6 **package that I gave to Clarence.**
7 **You could -- I don't know if there's two**
8 **signatures. Yeah, there are. So this was drafted**
9 **by -- actually, it doesn't say who it was drafted**
10 **by.**
11 **But this would have been a cover sheet**
12 **attached to everything underneath. And on Page 2,**
13 **that would have been the cover sheet drafted by**
14 **myself.**
15 Q And was this cover sheet drafted by
16 you --
17 A **On Page 2?**
18 Q -- on Page 2.
19 Was this a regular course of your FOIA
20 process or FOIA request processing?
21 A **Yes.**
22 Q It says "The following information being

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1 provided is a result of a systemic search of S/ES
 2 STARS/CARS/STePs databases."
 3 What are STARS, CARS, and STePs
 4 databases?
 5 **A So those are three different databases.**
 6 **Two of them are going to be kind of repetitive,**
 7 **but I'll tell you what each of them are.**
 8 **So STARS, which I don't recall what each**
 9 **letter stands for, is a database that we capture**
 10 **all records in our building -- well, let me say**
 11 **most records, hopefully all records, going from**
 12 **anyone in our building or outside source, that**
 13 **goes up to people on the seventh floor. And**
 14 **that -- it's a tracking system.**
 15 **So any record that's put in there is**
 16 **tracked through our office, as it goes up front.**
 17 **Now, these can be action memos, these can be**
 18 **letters from outside sources. If Judicial Watch**
 19 **sent a letter in to be read by the Secretary, it**
 20 **would be found in that database.**
 21 **CARS and STePs are both essentially cable**
 22 **databases. I believe it's almost 100 percent**

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1 **cables. But still we would search them just as a**
 2 **precaution, in case there's anything else. Or**
 3 **mention of anything in there.**
 4 **Q And of those -- in those three databases**
 5 **are e-mails correspondences included?**
 6 **A So I'm -- I actually don't know. There**
 7 **are some e-mails that are put in STARS. I don't**
 8 **know what the grand scheme was of STARS.**
 9 **But, no, e-mails primarily are not kept**
 10 **in STARS.**
 11 **Q So in 2014 did you search for e-mails**
 12 **when a FOIA request came in?**
 13 **A We only searched these three databases.**
 14 **Q And why did you only search those three**
 15 **databases?**
 16 **A Those were the three that I had access**
 17 **to, that we did as a standard search for FOIA**
 18 **requests.**
 19 **Q And how about requests that related to**
 20 **communications; how would you search for any**
 21 **communications that -- within the Secretary's**
 22 **office?**

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1 **A That would have been through STARS or**
 2 **possibly, if -- communications would be cables as**
 3 **well. But primarily STARS would have been the**
 4 **source of the records we were looking for.**
 5 **Q What about e-mail communications?**
 6 **A Again, there could be some. There should**
 7 **be some in STARS. So that's the database we**
 8 **searched in.**
 9 **Q If we can take a look at Page 3.**
 10 **Can you describe this document for me?**
 11 **A Yes. This is a search criteria page, as**
 12 **we call it. In it very briefly would give a**
 13 **description, but obviously it doesn't -- there's**
 14 **not a lot of room to put the whole description in.**
 15 **I put the date that it was due.**
 16 **Q Who determined a due date?**
 17 **A Usually it was provided by A bureau.**
 18 **They would -- I would actually say I don't recall**
 19 **back then on these paper forms. I don't know if**
 20 **they all had due dates.**
 21 **But if they had one, obviously that's the**
 22 **section I would put it in, or someone else.**

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1 **And then as you look down the page, you**
 2 **would see the search terms that were used. And**
 3 **the X's refer to if I did a search in each of**
 4 **those categories.**
 5 **So STARS had two areas you can search in.**
 6 **One was abstract, which essentially meant -- and,**
 7 **again, it was hand typed by someone -- what the**
 8 **gist of the document is.**
 9 **And then the subject is short for subject**
 10 **edits. If you had a large document, you would**
 11 **take, again, key words out that you think would be**
 12 **useful for doing a search later. And you would**
 13 **fill those subject edits.**
 14 **So if I was looking for a document that**
 15 **had to do with Ambassador Rice, I could put that**
 16 **search term in and pull those records.**
 17 **And the same with the two cable**
 18 **databases. They were searched, apparently, by**
 19 **this.**
 20 **Q And who determined the search for**
 21 **criteria listed over on the left?**
 22 **A It could have been in two ways. I could**

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1 have -- if -- you know, hypothetically, it either
2 could have been me doing the search at first and
3 coming up with search terms.
4 And again, they evolve. As I'm doing a
5 search or anyone is doing a search, if we stumble
6 upon more things, we'll add more search terms. So
7 it's not always directly taken from the FOIA.
8 So, again, it could have been two-tier,
9 in that the person doing the search would have
10 come up with search terms, and then provide it to
11 management. And then it could have come back to
12 add more search terms.
13 Or a meeting with management at the
14 beginning, coming up with search terms, and then
15 moving it forward, again, to management. And it
16 happens all the time in both directions.
17 Q That after a search is done, sometimes it
18 comes back with additional search criteria?
19 A Yes.
20 MR. PEZZI: Objection. Form.
21 Q At the bottom it says date range,
22 September 1st, 2012, to December 31st, 2012.

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1 What is that?
2 A This would have been the date range used
3 for the search terms above.
4 Q And who comes up with that date range?
5 A This -- well, I don't know if there was
6 any communications with A bureau outside of what
7 we see in this document. So it could have been a
8 discussion with -- with A bureau.
9 But it would appear that the nature of
10 the scope for the search would likely fall within
11 that date range.
12 Q Do you know why the date range would end
13 in December 2012, when the Secretary was in office
14 until February 2013?
15 A I don't know why we actually chose this
16 date range. I just don't recall.
17 Q And on Page 4, do you know what this is?
18 A Yes. It's a little blurred on the bottom
19 left corner, but this is a DS-1748, which is a
20 standard form to fill out that a FOIA has been
21 submitted to the department.
22 The information at the top was -- I don't

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1 know who filled that out, because I see two names
2 in there. But it would have been filled out.
3 That top section is not my writing.
4 And then that would have been submitted
5 to us with the FOIA request, which starts on Page
6 6.
7 And as a side note, they provide this to
8 the department, so that you can fill out
9 specifically what you did, how many records you
10 found, how many hours you spent. In our office we
11 preferred to do the pages that you see, Pages 1,
12 2, and 3 instead, because we felt like it creates
13 a better depiction of how we did the search than
14 just filling in on this form.
15 Q And so it shows here the date tasked was
16 September -- I'm sorry, July 9, 2014.
17 Is that the date -- when it says Date
18 Tasked, that's the date it was sent to your
19 office?
20 A I don't know.
21 Q And so this packet, this is -- there's
22 eight pages here, and that includes the FOIA

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1 request itself.
2 But the -- the first five pages -- six
3 pages -- five pages, those are internal Department
4 of State documents?
5 A What do you mean by "internal"?
6 Q A memo and the second memo, the third
7 page, the search criteria such, and the Search
8 Tasker documents, those are routine -- are they
9 routine Department of State forms that are used?
10 A Well, they're routine for my office.
11 Q For your office.
12 A Yeah. I don't know what other offices
13 outside of our office, which is S/ES, does.
14 Q So for each FOIA request that comes in,
15 would these be -- would each FOIA request at the
16 end of your search and your process have these
17 documents associated with it?
18 MR. PEZZI: Objection. Form.
19 A The top three documents?
20 Q Yes.
21 A At that time I believe yes.
22 And if I could just clarify. For FOIA.

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1 For congressional sometimes we -- we do it
2 different; but only in what the cover sheets might
3 look like.
 4 Q If I could draw your attention to, I
 5 think it's Page 3? No. The first page.
6 A Okay.
 7 Q It states "The Office of Correspondence
 8 and Records searched the Secretariat Tracking and
 9 Retrieval System, STARS, STePs, and the top secret
 10 files and found zero documents related to the
 11 above-referenced tasker."
 12 You did not mention the top secret files.
 13 What is the top secret files?
14 A So the top secret files would have been
15 interagency top secret documents that would have
16 been stored in a safe.
17 If, in fact -- I mean, assuming all of
18 this is accurate, I don't believe that is
19 accurate, that we searched the top secret files.
20 That would have been me specifically going over to
21 the safe and looking through hard-copy records.
22 But I -- it appears that the scope of

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1 what we were searching for wouldn't have been one
2 of those records.
 3 Q And so you said that you believe it's
 4 inaccurate because you don't believe that you
 5 walked over and physically searched the top
 6 secret?
7 A Well, not that I --
 8 MR. PEZZI: Objection. Form.
9 A Not that I recall. But I just see an
10 inconsistency between what I filled out
11 potentially and what's on this front sheet. And I
12 don't know who wrote this.
13 But I do also state that it's fairly safe
14 to say that they probably would have assumed it.
15 Because if we can put -- so STARS you can't put
16 top secret in, it's not handled up to that
17 classification.
18 But most of the time a top secret
19 document has a subject that is not top secret. So
20 if we -- we could still put that in STARS.
21 So passively you are doing a search of
22 records that could be in the safe, because you

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1 could always tie it to it through the system of
2 STARS.
 3 Q So the -- I just want to get some
 4 clarification. There are some documents that are
 5 in both the top secret files as well as STARS.
 6 MR. PEZZI: Objection.
 7 You can answer the question to the extent
 8 that you can do so without, obviously, describing
 9 any top secret documents or even the specific
 10 locations or the manner in which top secret
 11 documents are stored.
 12 THE WITNESS: Okay.
13 A As I said a second ago, the subject of
14 most top secret records are not top secret. So we
15 could put that simply as a blank document, but
16 still identify the subject in STARS.
17 So if I did a search for Ambassador Rice,
18 it would pop up. And then I would see a blank
19 document that says, Go to the safe.
20 So at that time again, I -- I don't know
21 why I didn't put that I searched top secret in
22 the -- on the third page search criteria form.

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1 And I -- simply because I don't recall. But I
2 just want to mark that the two don't speak to each
3 other, the two pages.
 4 Q And I appreciate that, walking through
 5 and clarifying the -- the databases.
 6 And -- but so these were the databases
 7 that you searched at that time.
8 A Uh-huh.
 9 MR. PEZZI: Objection. Form.
 10 Q What's a PST file?
11 A A PST file is a personal storage table,
12 which, to my understanding, is a collection of
13 e-mails that you extract out of Outlook, Microsoft
14 Outlook.
 15 Q And at that time did you have PST
 16 databases that you would search in a FOIA request?
17 A I don't recall at that time.
 18 Q Do you do that now?
19 A We've evolved out of actually searching
20 PSTs, and now have a -- a larger database that
21 just completely absorbs all e-mails.
 22 MS. BURKE: Can you mark this Exhibit 2.

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1 (Wasser Deposition Exhibit 2 marked for
 2 identification, retained by counsel.)
 3 Q And what's been marked as Exhibit 2 is
 4 identified at the bottom DOS-441-1. This is the
 5 only page to the exhibit. And, again, this was
 6 produced by your attorneys in discovery in this
 7 case.
 8 Can you tell me what that is, what the
 9 document is that I put in front of you?
 10 **A This also looks like the same type of**
 11 **cover sheet that you see on Page 1 of Exhibit 1.**
 12 Q And it's accurate to say it's dated
 13 November 17, 2014?
 14 **A Can you say that again?**
 15 Q Is it accurate to say that it's dated
 16 November 17, 2014?
 17 **A That's what it says here. I don't**
 18 **actually recall what the date was when this was**
 19 **processed.**
 20 Q So it says that the Office of
 21 Correspondence -- this is in relation to the FOIA
 22 request that we're speaking of, and that is the

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1 subject here today.
 2 **A Uh-huh.**
 3 Q 2014-08848, dated November 17, 2014.
 4 It says that "The Office of
 5 Correspondence and Records searched the
 6 Secretariat Tracking and Retrieval System, STARS
 7 STePs and the Top Secret files, and found two
 8 documents related to the above-referenced tasker."
 9 "Jonathon Wasser, a GS-11 management
 10 analyst for S/ES-S, spent three hours performing
 11 the search."
 12 Was this an additional search?
 13 MR. PEZZI: Objection. Foundation.
 14 Form.
 15 **A It -- I don't know. It doesn't appear to**
 16 **say it's an additional search. It looks like it's**
 17 **just a search.**
 18 **Again, I don't know -- I don't recall if**
 19 **we were asked to do a -- what we would call a**
 20 **supplemental search. So without any kind of**
 21 **reference, I -- I don't know.**
 22 Q When documents are retrieved from your

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1 search from the databases, what do you do with
 2 them? How are they -- are they pulled and
 3 produced? What happens with the documents
 4 themselves? After you have identified that they
 5 are located in your database?
 6 MR. PEZZI: Objection. Form.
 7 Foundation.
 8 **A And again, specifically to this case,**
 9 **this time period, you mean?**
 10 Q Yes.
 11 **A If -- if I recall correctly, as I'm**
 12 **finding records, I would either put them in a -- I**
 13 **would print them out. Any time I found a record,**
 14 **I would print it out. Because at the time that's**
 15 **the only way A bureau would receive records, was**
 16 **in hard copy.**
 17 **So if I found a hundred documents, I**
 18 **would be printing more than a hundred pages of**
 19 **responsive -- potentially responsive record.**
 20 **And I'm sorry, was that your question?**
 21 Q Uh-huh. It is. And then after you
 22 printed them, they would be provided to A

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1 bureau --
 2 **A Clarence Finney.**
 3 Q Clarence Finney?
 4 **A Well, Clarence Finney first.**
 5 **So, yeah, I would do the search. In this**
 6 **case, if this is accurate, I found two documents,**
 7 **so however many pages that is. I would have**
 8 **compiled it under -- going back to Exhibit 1 --**
 9 **what you see on Page 2 and 3.**
 10 **And then what you see here in Exhibit 2**
 11 **after approval, this is the cover sheet that would**
 12 **have gone over to A bureau, again I believe in**
 13 **hard copy.**
 14 Q And this cover sheet that goes over to A
 15 bureau, as you mentioned in Exhibit 1, is a cover
 16 sheet to the forms that you produced to Clarence
 17 Finney to go over to A bureau?
 18 MR. PEZZI: Objection. Form.
 19 **A Can you say that one more time?**
 20 Q So the -- the cover sheet in Exhibit 2,
 21 similar to the cover sheet in Exhibit 1. And
 22 Exhibit 1 includes the forms and documents that

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1 you provide to Clarence.
2 **A Uh-huh.**
3 MR. PEZZI: Objection. Form.
4 Q Seeing this cover sheet, would you expect
5 that it would have the same forms as provided in
6 Exhibit 1?
7 **A I'd have to see them to speak for**
8 **certain. I -- I mean, it says here that I put**
9 **three hours into this, performing the search.**
10 **But, again, without seeing those records, I -- I**
11 **wouldn't want to state.**
12 Q Do you recall doing a supplemental search
13 in this case?
14 **A No.**
15 MS. BURKE: I am going to mark this as
16 Exhibit 3.
17 (Wasser Deposition Exhibit 3 marked for
18 identification, retained by counsel.)
19 **A It's rather hard to read.**
20 Q It is. And I apologize. And for
21 identification purposes, this is -- the first page
22 of this exhibit is an April 18, 2016, letter to

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1 Kate Bailey, in relation to this Case Number
2 F-2014-8848.
3 And I want to draw your attention to a
4 document starting on Page 3, on the third page.
5 Do you recognize these documents as
6 having been found or part of the searches that you
7 did in 2014 on this case?
8 **A Let me just read it a little closer, if**
9 **you don't mind.**
10 Q Uh-huh.
11 **A Firstly, I don't recall what the two**
12 **documents were. And this document does not look**
13 **familiar.**
14 Q Is this the type of document that would
15 have been retrieved from your search in 2014?
16 MR. PEZZI: Objection. Form.
17 Foundation.
18 **A I don't recall what the documents looked**
19 **like or would have been at that time.**
20 MS. BURKE: If we could change directions
21 a little bit? So I don't know if we want to take
22 a little bit of a five-minute break?

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1 MR. PEZZI: It's up to you.
2 MS. BURKE: That would be good.
3 MR. PEZZI: Do you want a five-minute
4 break?
5 THE WITNESS: I'm good.
6 VIDEO SPECIALIST: We are going off the
7 record at 11:01.
8 (A recess was taken.)
9 VIDEO SPECIALIST: We are back on the
10 record at 11:34.
11 BY MS. BURKE:
12 Q Thank you, Mr. Wasser. I'm just going to
13 clean a couple of things up here.
14 With regard to the databases that you
15 search for any FOIA request or congressional
16 request, you had mentioned this -- I think it was
17 STePs. And that's the database that holds
18 communication and memos coming into the
19 Secretary's office. Is that correct?
20 MR. PEZZI: Objection. Form.
21 **A Could you say that last part one more**
22 **time?**

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1 Q The STePs is a database that retrieves or
2 maintains communications and memos that are coming
3 into the Secretary's office.
4 **A No, that's not what I said. That would**
5 **have been STARS.**
6 Q STARS.
7 **A Yeah. STePs was the cable database.**
8 Q Cable database. Okay.
9 **A And again just to clarify, you did say**
10 **searches. I believe it sounded like present**
11 **tense, or did you mean searched for this case?**
12 Q Searched for this case.
13 **A Then my answer is still the same.**
14 Q What about internal communications
15 throughout the Secretary's office?
16 **A What would those entail?**
17 Q Those going between offices or between
18 staff within the Secretary's office; where would
19 those communications be?
20 **A What's an example?**
21 Q Memo from the Secretary to her chief of
22 staff, or her chief of staff to...

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1 A So something like that potentially -- and
2 I mean, you're asking a broad stroke -- it sounds
3 like most of that would have been in STARS. But
4 if you're asking if a staffer talked to another
5 staffer or if a senior advisor in the Secretary's
6 office talked to the Secretary, again without
7 hard-copy record, I don't know.
8 Q But STARS would have maintained that type
9 of inter -- internal communication within the
10 Secretary's office?
11 MR. PEZZI: Objection. Form.
12 A So, again, STARS captures internal,
13 meaning respect to our Department of State. So
14 anything within the Department of State, which
15 are -- I don't know the exact number, hundreds of
16 offices, where they would have sent stuff up to
17 the Secretary or Deputy Secretary, those top
18 senior offices.
19 So, again, if it was something within
20 that internal office, the Secretary's office,
21 where the scheduler hand delivered something to
22 the Secretary, I -- I don't know if that would

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1 have been. But we -- I know the goal is to
2 capture as much as we can.
3 Q And that's -- those are -- that's the
4 avenue I'm -- I'm looking for. Is, you know,
5 anything maybe between Mrs. Clinton and Cheryl
6 Mills or Jacob Sullivan or between Cheryl Mills
7 and Jacob Sullivan, those communications would be
8 collected and maintained in one of these
9 databases --
10 MR. PEZZI: Objection.
11 Q -- STARS?
12 MR. PEZZI: Objection. Form.
13 Foundation.
14 Sorry.
15 A I believe so, they would be captured.
16 Q So with regard to the Benghazi talking
17 points that is the subject matter of this
18 litigation, where or how did you search for e-mail
19 communications between staffers or the Secretary
20 and her staff?
21 A For the second search here, the November,
22 or --

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1 Q Both.
2 A -- can you clarify?
3 Q Either search.
4 A To my understanding, it would have been
5 through STARS, if there were any e-mails captured
6 into that database.
7 Q It would have been through STARS.
8 At that time were there searches done of
9 e-mail databases for communications --
10 MR. PEZZI: Objection. Foundation.
11 Q -- with respect to a FOIA request?
12 MR. PEZZI: Sorry.
13 A If any were uploaded into STARS. But
14 I -- I'm unaware of any other searches.
15 Q Who would upload or how would they be
16 uploaded into STARS?
17 A That I'm unaware of.
18 Q If I could turn back to Exhibit 2, the
19 November 17 reference to two documents found
20 through a search?
21 A Uh-huh.
22 Q Why was there an additional search done?

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1 MR. PEZZI: Objection. Foundation.
2 A Without other documents to reference why,
3 I don't recall.
4 Q The two documents that are referenced in
5 this -- this cover memo, is there a way, do you
6 have the capabilities now currently to go back and
7 determine what those two documents were?
8 A I don't think it would be a very good
9 system. Again, because we were never -- we have a
10 deposition schedule, where -- or deposition? I
11 forget the term. Disposition schedule, where we
12 only need to hold our records for a certain amount
13 of time. And this would have been about five
14 years ago. So I don't know if we even have those
15 responses in our possession anymore.
16 But certainly this is kind of just a
17 scientific standard, that we should be able to
18 always reproduce these searches the way it looks
19 here.
20 Now, obviously more records could have
21 gone into the system between when we did that
22 search and now. Even with that date range. But I

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1 don't believe we have -- I know for a fact we
2 don't have a folder or an electronic capture in
3 our office of our response.
4 So if you asked me to find these two
5 right now, I would actually have to go look -- do
6 the search again.
 7 Q You would have that capability with
 8 the -- to search the systems that were searched in
 9 2014?
10 A Not exactly. Actually, CARS, the cable
11 archive -- I don't know what it stands for. That
12 one I think was shut down. And was shut down in
13 the sense that that system isn't used anymore.
14 But all those cables are now searchable through
15 another system.
16 So, no, I wouldn't be able to completely
17 reproduce the search.
 18 Q Do you know why this cover memo doesn't
 19 have the additional documents that you would have
 20 produced in doing a search?
 21 MR. PEZZI: Objection. Form.
 22 Foundation.

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1 A Because by itself it's just a cover memo.
2 If the whole package was together, I
3 would imagine the other two documents are in it.
 4 Q Did you do -- did you create a package
 5 that would include those other forms for the
 6 supplemental search in November 2017?
7 A I don't recall doing it. This document
8 says that I was the analyst that performed the
9 search. So going on what this document says, I
10 would assume those two documents were attached in
11 the package. But I don't recall.
 12 MS. BURKE: If I could have this marked
 13 as Exhibit 3 -- Exhibit 4.
 14 (Wasser Deposition Exhibit 4 marked for
 15 identification, retained by counsel.)
 16 Q You've just been handed what's been
 17 marked as Exhibit 4. It's identified at the
 18 bottom as DOS-723. It is 13 pages. And I'll
 19 represent to you that this was a document that was
 20 produced to us in this discovery from your
 21 attorneys.
22 A Can I ask, is this the quality that you

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1 receive it in?
 2 Q Yes.
3 A Okay.
 4 Q And I'll represent for the record this is
 5 a November 12, 2014, production letter. It's a
 6 letter that went to Judicial Watch identifying
 7 four documents, and attached are the four
 8 documents that were produced in this case with
 9 regards to this FOIA request.
 10 If I can refer you back to Exhibit 2.
 11 This production letter -- and production was
 12 produced -- or is dated November 12.
 13 Why would a search regarding this request
 14 be done five days later?
 15 MR. PEZZI: Objection. Foundation.
16 A So before I answer that, can you just
17 walk me through the dates on both of these.
18 So I do see a stamp up here that says
19 November 12. And this one's typed November 17.
20 But can you explain this a little more?
 21 Q So this typed November 17, 2014, I assume
 22 is the -- it's the date of the cover letter that

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1 shows this additional search.
2 A Uh-huh.
 3 Q With two -- two documents in the above --
 4 to the above-referenced tasker.
5 A Okay.
 6 Q The stamp on the letter that was sent to
 7 Judicial Watch I'm going to assume is the stamp
 8 that came from the Department of State.
9 A Okay. So can you repeat your question?
 10 Q So why would a search, an additional
 11 search related to this request, have been done
 12 after the production of the documents as noted in
 13 the November 12, 2014, letter?
 14 MR. PEZZI: Objection. Foundation.
15 A Well, I haven't seen what the two
16 documents are in Exhibit 2.
17 Do you know if those two documents were
18 included in Exhibit 4?
 19 Q We do not. And that's actually what I'm
 20 asking you.
21 A Oh, I mean --
 22 Q This is what we would like to try and

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1 find out, if the two documents referenced in this
2 subsequent search are documents that were produced
3 of Exhibit 4.
4 **A So Exhibit 4 was compiled by someone**
5 **outside my office. This had -- this was A bureau.**
6 **So I -- I couldn't get into the mind of who**
7 **drafted this or who compiled everything.**
8 Q But why would your office have done a
9 search after A bureau sent a production?
10 **A It may have been pending with us. Again,**
11 **I don't know why A bureau would have compiled**
12 **this, if there was something outstanding with us.**
13 Q Okay.
14 MS. BURKE: I'm going to have --
15 **A Was it already in litigation at this**
16 **point?**
17 Q Yes.
18 **A By November 12?**
19 Q Yes.
20 MS. BURKE: Let's mark this as Exhibit 5.
21 (Wasser Deposition Exhibit 5 marked for
22 identification, retained by counsel.)

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1 Q And you've been handed what's been marked
2 as Exhibit 6 -- Exhibit 5.
3 MR. PEZZI: And I'll just note for the
4 record this appears to be a July 7, 2015,
5 declaration of John F. Hackett which is a 40-page
6 document. It looks like this includes the
7 entirety of his declaration, but does not include
8 the supporting exhibits.
9 MS. BURKE: And that is correct. I'm
10 referencing just his declaration itself.
11 Q If I could draw your attention to Page 4
12 of Mr. Hackett's declaration.
13 **A Okay.**
14 Q Paragraph 8.
15 You know what? I apologize. I'm going
16 to back up a little bit.
17 Do you know who John Hackett is?
18 **A Yes, I do.**
19 Q Who is he?
20 **A At the time of when he drafted this, and**
21 **I believe mostly in the capacity that I ever knew**
22 **him, he was the director, acting director of the**

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1 **FOIA-handling unit in A bureau.**
2 Q Did you ever work directly with
3 Mr. Hackett with regard to FOIA requests?
4 **A I've been in meetings where he was in the**
5 **same meeting. But I -- so, yeah, I've, like,**
6 **worked with him on FOIA, but never sat down at the**
7 **same desk and finished a case together.**
8 Q Did you ever work with him in drafting a
9 declaration for a FOIA request?
10 **A I don't recall.**
11 Q The meetings that you may have been in
12 with him, were any of them related to Benghazi,
13 the Benghazi attacks?
14 **A I don't recall.**
15 Q And now I'm going to draw your attention
16 to Paragraph 8 of Mr. Hackett's declaration.
17 **A Okay.**
18 Q He states that the -- the second
19 sentence. "The department tasked only the
20 Executive Secretariat to search for agency records
21 responsive to plaintiff's avowed construction of
22 its request."

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1 That -- that's your -- is that your
2 office that he's referring to?
3 **A Yes. So the Executive Secretariat is**
4 **kind of -- we would handle the FOIA requests for**
5 **them. So presumably that's accurate.**
6 Q That were generated between September 11,
7 2012, and September 23rd, 2014, the day that the
8 search was conducted.
9 If I could point you back to Exhibit 1,
10 on Page 3, the date range.
11 **A Uh-huh.**
12 Q The date range there shows 9/1/2012 to
13 12/31/2012. Why is that different than what's ...
14 **A I would --**
15 MR. PEZZI: Objection. Foundation.
16 **A I would say without the evidence under**
17 **some of the other memos, I'm not sure why.**
18 **Again, I didn't write this declaration.**
19 Q I understand.
20 And what other memos are you referring
21 to?
22 **A You handed -- Exhibit 2 is just a cover**

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1 memo.
2 Q Okay.
3 A **So I don't know what took place under**
4 **that. I would have to see what our search terms**
5 **and time frame was.**
6 Q There may be a different date range for
7 this referenced second -- or additional search?
8 A **I don't know.**
9 Q If you look at Paragraph 10. Mr. Hackett
10 says "On September 9, 2014, a management analyst
11 who was knowledgeable of both the request and
12 S/ES-S records system conducted a search of S/ES-S
13 electronic records system reasonably likely to
14 contain responsive records."
15 Is that management analyst referenced
16 here you?
17 A **I believe it is.**
18 Q In the -- Mr. Hackett's declaration
19 continues to say "The systems include the
20 Secretariat Tracking and Retrieval System, the
21 Secretariat Telegram Processing System, the Cable
22 Archiving Retrieval System, and the Top Secret

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1 files."
2 You testified earlier, you stated
3 earlier, that you believed that is incorrect --
4 MR. PEZZI: Objection to form.
5 Q -- that the top secret files was not
6 searched in this -- in response to this request?
7 MR. PEZZI: Objection. Form.
8 A **I explained that the two pages showed**
9 **different information, but that the top secret**
10 **files would have passively been searched in STARS,**
11 **being that the names -- that the subjects would**
12 **have been available to be searched.**
13 Q If you could look at Paragraph 11. And
14 if you could just read through it so that you have
15 familiarity with it.
16 A **Okay.**
17 **Okay.**
18 Q So Paragraph 11 references a September
19 23rd furtherance search of state.gov e-mail
20 accounts of three individuals: Cheryl Mills,
21 Jacob Sullivan, and Huma Abedin, in the Office of
22 the Secretary.

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1 Is that a search that you would have
2 performed?
3 A **I will say I don't recall doing that**
4 **search.**
5 **Do we have here any of these exhibits**
6 **that were cover memos for it, the 23rd?**
7 Q We don't. We -- we do not, I will say,
8 as far as the September 23rd dated search that's
9 referenced here, we don't have a cover memo or
10 any -- any of the additional forms.
11 Is that something that would have been
12 created?
13 A **If I had done the search, I would have**
14 **definitely made a memo, something that would have**
15 **gone over to A bureau.**
16 Q Similar to what's in Exhibit 1?
17 A **Yes.**
18 **So I'm not saying it didn't happen; I**
19 **just -- I would have to see it to confirm if I did**
20 **it or not.**
21 Q If you had done it, would that be
22 something that you would be able to go back and --

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1 and locate and produce?
2 A **If it's 2014 -- is that correct?**
3 Q Correct.
4 A **Potentially. I -- I don't know. A lot**
5 **of those records weren't stored, again, the same**
6 **way that we store them now.**
7 **But if it was sent to A bureau, I don't**
8 **know what their disposition schedule is. Maybe**
9 **they would still have the entire package.**
10 Q If it was a search that was done in your
11 office, you would have had a package that would
12 have gone to A bureau?
13 MR. PEZZI: Objection. Form.
14 A **Can you say that one more time?**
15 Q If it was something that was done, then
16 you would have had a package similar to this in
17 Exhibit 1, that you would have sent to A bureau?
18 MR. PEZZI: Objection. Form.
19 A **Yes.**
20 MS. BURKE: Can you mark that as Exhibit
21 6.
22 (Wasser Deposition Exhibit 6 marked for

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1 identification, retained by counsel.)
2 Q And you've just been handed what's been
3 marked as Exhibit 6, identified at the bottom as
4 DOS-212.
5 It appears to be an e-mail from you --
6 yourself, to James Bair and Monica Tillery, dated
7 September 23rd, 2014. The subject matter is FOIA
8 2014-08848, which is the FOIA request that is the
9 subject here.
10 A **Uh-huh.**
11 Q And it is fully redacted.
12 What was this e-mail?
13 A **For the redacted information, I have -- I**
14 **don't recall.**
15 Q Have you seen this e-mail in unredacted
16 form?
17 A **Not that I recall.**
18 Q And I'll also note that it shows there
19 are attachments. It's a PDF referencing the case
20 file, this file number for this case.
21 A **Uh-huh.**
22 Q What -- what would that be?

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1 MR. PEZZI: Objection. Form.
2 Foundation. And to the extent it calls for
3 information protected by the attorney-client
4 privilege or the attorney work product doctrine, I
5 would instruct the witness not to answer.
6 Q Is that identification of that attachment
7 protected by attorney-client privilege that you
8 believe?
9 MR. PEZZI: Objection. Form.
10 You could ask the witness whether he
11 knows what the attachment is. And he can answer
12 that with a yes or no.
13 A **I don't know what that document is.**
14 Q Who is Ruby Thomas?
15 A **Ruby Thomas was the office manager -- OMS.**
16 **Essentially a secretary for Clarence Finney.**
17 **So when I would provide Clarence my**
18 **package of FOIA responses, after he approved it,**
19 **she would then make potential -- again, I don't**
20 **know because I thought she usually signed her**
21 **memos. She potentially would be the one that**
22 **would draft up the memo.**

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1 Q Who is James Bair?
2 A **Jamie Bair was, I believe still a**
3 **practicing attorney for the State Department. And**
4 **likely in this time capacity he was one of the**
5 **attorneys assigned to FOIA. So for litigation**
6 **cases.**
7 Q And I apologize. You said that you had
8 not seen this e-mail in unredacted form?
9 A **I mean, it's from me. So I -- it says**
10 **it's from me. So I assume I have seen it. But I**
11 **don't recall what this e-mail was, or what's under**
12 **it.**
13 Q If I can turn you back -- turn your
14 attention back to Exhibit 5.
15 Again, Paragraph 11, "These individuals,"
16 individuals being Cheryl Mills, Jacob Sullivan,
17 and Huma Abedin, "were selected by members of the
18 Office of the Secretary based on their
19 understanding of which staff members within the
20 Office of the Secretary during former Secretary
21 Clinton's tenure worked on issues related to the
22 Benghazi attacks, and whose records may therefore

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1 reasonably be expected to contain responsive
2 records."
3 Would that be you or Mr. Finney that
4 would have made that determination?
5 A **I don't know who made that determination.**
6 Q And Paragraph 12 mentions that for both
7 the databases and the e-mail records, and then
8 lists the search terms that were identified on the
9 form in Exhibit 1.
10 The e-mail records are a separate
11 database or separate search engine?
12 MR. PEZZI: Objection. Form.
13 A **I'm sorry, I didn't understand that**
14 **question.**
15 Q So for both the databases identified
16 above in Paragraph 10 and the e-mail records, S/ES
17 used the search terms and lists the search terms.
18 So how would the e-mail records be
19 searched?
20 A **So, again, I don't recall doing the**
21 **e-mail search for this. But there would have been**
22 **a PST for -- or several for each of these people.**

Conducted on June 6, 2019

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1 **And they would have been indexed onto essentially**
 2 **a blank Outlook so that I couldn't accidentally**
 3 **send those e-mails.**
 4 **Once they're fully indexed, a search**
 5 **would take place of them.**
 6 Q And why would those PST files or database
 7 not have been initially searched?
 8 MR. PEZZI: Objection. Form.
 9 Foundation.
 10 **A I don't know.**
 11 Q At this time in 2014 did you search PST
 12 files for FOIA requests generally?
 13 **A There -- I don't know the exact dates or**
 14 **time. But there was a time when it was not a**
 15 **general practice to search them.**
 16 **And if this, on September 23rd, 2014, if**
 17 **it was me or whoever did this search, they**
 18 **obviously did do it.**
 19 Q And at that time would there have been
 20 anybody else in your office that would have done
 21 the search?
 22 **A Potentially Clarence Finney. But for**

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1 **this case, again, I don't recall.**
 2 Q But it would have been -- it was just
 3 yourself and Clarence Finney that would have done
 4 the search?
 5 **A Yes.**
 6 Q And that's within your office. Would
 7 there have been other offices or individuals that
 8 would have been tasked with doing the e-mail
 9 search referenced in Paragraph 11?
 10 MR. PEZZI: Objection. Foundation.
 11 **A So to retrieve these PSTs, that's not**
 12 **something I would have been able to do without the**
 13 **help of our information resource management group.**
 14 **And again, it doesn't state who did the**
 15 **search here. Again, there was a transition**
 16 **where -- or maybe not even a transition. I don't**
 17 **know if IRM ever performed searches on this. So**
 18 **likely it would have been us requesting these**
 19 **records, and then us performing the search.**
 20 **But, again, I don't know who did this**
 21 **search.**
 22 Q In looking at Exhibit 6, is there a

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1 likelihood that --
 2 **A Sorry, I seem to have lost Exhibit 6.**
 3 **Which one was that?**
 4 Q It's a single page.
 5 **A Okay.**
 6 Q The e-mail communication is dated
 7 September 23rd, which is the reference date in
 8 Paragraph 11. Would it be fair to say that the
 9 attachment would be the resulting documents or the
 10 results of the search done --
 11 MR. PEZZI: Objection.
 12 Q -- in this case?
 13 MR. PEZZI: Objection. Form.
 14 Foundation.
 15 **A I don't know what that PDF is.**
 16 **As I mentioned before, we would sometimes**
 17 **get requests in from A bureau, and that's where I**
 18 **believe Monica Tillery was. So this could -- that**
 19 **PDF could be a back and forth about the actual**
 20 **FOIA that they provided.**
 21 **I don't know what that PDF is without**
 22 **looking at it.**

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1 Q Have you reviewed any of your own records
 2 or your own e-mails to familiarize yourself or
 3 refresh your recollection with regard to this case
 4 and the searches done here?
 5 MR. PEZZI: You can answer that with a
 6 yes or a no.
 7 **A No.**
 8 Q And why didn't you -- why didn't you
 9 familiarize yourself with the subject of this case
 10 and your conduct involved with this FOIA search?
 11 MR. PEZZI: Objection. Calls for
 12 information protected by the attorney-client
 13 privilege.
 14 You can answer to the extent you can do
 15 so without revealing the content of any
 16 communications that you had with government
 17 attorneys.
 18 **A I did not review it for whatever reason.**
 19 Q And were you instructed by anyone not to
 20 review things to familiarize yours in this case?
 21 MR. PEZZI: Objection. Clearly calls for
 22 information protected by the attorney-client

Conducted on June 6, 2019

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1 privilege, the attorney work product doctrine.
 2 And I instruct the witness not to answer.
 3 Q And you're not answering right now under
 4 the instruction of your attorney.
 5 Is that correct?
 6 A **Yes.**
 7 Q I apologize. Just give me just a moment.
 8 A **Take your time.**
 9 Q If I could direct you to Paragraph 15.
 10 It shows -- it states "In addition, to guard
 11 against the possibility that a particular document
 12 was overlooked, the management analyst also
 13 reviewed each of the documents that were produced
 14 to plaintiff from USUN/W, rather than the Office
 15 of the Secretary, in a related litigation."
 16 Is that mad -- management analyst you?
 17 A **Just give me a minute to read this.**
 18 Q Sure.
 19 A **I don't recall this. I don't think it**
 20 **mentions specifically that that was the S/ES**
 21 **management analyst. And at the end of the first**
 22 **sentence, I'm -- I'm rather confused what they're**

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1 **saying took place.**
 2 **"Also reviewed each of the documents that**
 3 **were produced to plaintiff rather than the Office**
 4 **of the Secretary." I don't know what that means.**
 5 Q The -- the reference -- I'm going to
 6 represent to you that they are referencing an
 7 identical FOIA request that the plaintiff sent to
 8 that office.
 9 A **And a different FOIA request?**
 10 Q Yes. Two separate.
 11 A **Okay. So identical subjects?**
 12 Q Correct.
 13 A **Okay.**
 14 MR. PEZZI: Objection. Form.
 15 A **But without more information, I don't**
 16 **know if that's me. Or a management analyst from**
 17 **S/ES.**
 18 Q Would it have been anybody else in S/ES?
 19 A **I don't know of another management**
 20 **analyst. But I do recall when I was doing some**
 21 **research into -- I was trying to get my grade --**
 22 **trying to build a case for why a GS-11 should be a**

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1 **higher grade, I uncovered that there are a lot of**
 2 **management analysts at the State Department, in**
 3 **all different offices, all different grades.**
 4 **So I don't know, looking at this, if this**
 5 **is, in fact, an S/ES management analyst. All I**
 6 **know is the department has a lot of them.**
 7 Q So I think earlier we -- in Paragraph 10,
 8 we describe a management analyst. And you had
 9 mentioned you don't specifically recall whether it
 10 was you. But it would have been you or Clarence
 11 Finney.
 12 MR. PEZZI: Objection. Form.
 13 Q In Paragraph 15 --
 14 A **Sorry. Was that a question?**
 15 Q Not yet.
 16 A **Okay.**
 17 Q In Paragraph 15 it says, The management
 18 analyst. Is it fair to say that "the" is
 19 referencing the same management analyst described
 20 in Paragraph 10 that did the initial search?
 21 A **Being that I didn't draft this, I don't**
 22 **know where the mind was of the person drafting**

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1 **this.**
 2 **And I haven't read the whole document, so**
 3 **I don't know if they refer to other management**
 4 **analysts in other paragraphs.**
 5 MS. BURKE: If we can go off the record
 6 for just a moment.
 7 VIDEO SPECIALIST: We are going off the
 8 record at 12:14.
 9 (A recess was taken.)
 10 VIDEO SPECIALIST: We are back on the
 11 record at 12:14.
 12 BY MS. BURKE:
 13 Q Thank you, Mr. Wasser. And I appreciate
 14 you being very forthcoming and cooperative in
 15 answering my questions. I know it's been a long
 16 time since that particular search was done.
 17 I am going to switch gears a little bit
 18 here and move to another topic that is also part
 19 of this discovery process in the case.
 20 And as I said, so that was regarding the
 21 specific search and production of records with
 22 respect to the FOIA request at issue here.

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1 Have you -- or did you review Judge
2 Lamberth's discovery order in this case?
3 **A I don't know what that is.**
4 Q So one of the reasons that we are here
5 today taking your deposition is Judge Lamberth in
6 this case reviewed some documents, heard from both
7 parties, and made a determination that a limited
8 amount of discovery, part of which includes these
9 depositions, would move forward. And he did
10 identify you as somebody -- did identify your
11 deposition. And part of his order was that we
12 were permitted to bring you in today and ask you
13 some questions.
14 And he specifically pointed to particular
15 e-mails suggesting that he, you, Jonathon Wasser,
16 knew about Clinton's private e-mail use in 2014.
17 MS. BURKE: I'm going to ask that this
18 be --
19 **A He -- the judge stated that?**
20 Q That is correct.
21 So I am going to ask you just a little
22 bit about -- you started at the Department of

90

1 State while Hillary Clinton was in office.
2 Correct? You had said 2010?
3 **A I actually don't know when she started.**
4 **Was it two thousand -- do you know the year she**
5 **started?**
6 Q Her tenure was 2009 to 2013.
7 **A Okay. I'll say when I started I was**
8 **completely unaware, really, who the top-level**
9 **people were. My nature of work didn't really**
10 **matter who the Secretary or Deputy Secretary were.**
11 **So, yeah, when I moved up to the**
12 **Executive Secretariat in 2011, obviously then I**
13 **knew who my boss was.**
14 Q And in your role in 2011 and specifically
15 in 2014, as a management analyst for FOIA --
16 sorry. Strike that.
17 Were you aware that Hillary,
18 Mrs. Clinton, I apologize, Mrs. Clinton had any
19 form of e-mail that she used to communicate for --
20 for business?
21 **A And what was the date?**
22 Q At any point during your time at the

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1 Department of State.
2 **A So even up to now?**
3 Q Yes.
4 **A As of now, yes.**
5 Q And when did you find out?
6 **A I don't recall exactly.**
7 Q When was the first time that you saw
8 Mrs. Clinton's e-mail address?
9 **A The first time I recall seeing it was on**
10 **the paper copies that came back to us in the**
11 **boxes.**
12 Q Paper copies of what?
13 **A There's big tranches of e-mail that were**
14 **pulled, I believe, from a server or somewhere. I**
15 **don't know.**
16 Q And your office received a copy of those
17 55,000 doc -- 55,000 e-mails?
18 **A Yes, we did.**
19 MR. PEZZI: Objection. Form.
20 Q And that was the first time that you saw
21 Hillary Clinton's e-mail address.
22 **A That's the first time I recall seeing**

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1 **them.**
2 Q When you received FOIA requests that were
3 specifically referencing or requesting e-mails or
4 e-mail -- e-mails of Mrs. Clinton or anyone on her
5 staff, how did you go about searching for those?
6 MR. PEZZI: Objection. Form.
7 **A Can you repeat that?**
8 Q When your office received a FOIA request
9 or a congressional inquiry related to e-mails of
10 Mrs. Clinton or her staff, how did you go about
11 searching for those?
12 MR. PEZZI: Objection. Form.
13 Foundation.
14 **A For e-mails at that time, I -- I don't**
15 **recall. I think it would have just been searching**
16 **through STARS.**
17 Q And this was in 2014?
18 **A Yes. Specifically for this case, when we**
19 **received that.**
20 Q In 2014 did you know whether or not
21 Mrs. Clinton had an e-mail address?
22 **A I don't believe I did.**

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1 Q You don't believe --

2 A **I would say I don't recall any -- as I**

3 **stated before, in 2015, when we received the**

4 **records, at least my -- my memory of it, that was**

5 **the first time I knew of it.**

6 **Anything before that, I don't think I**

7 **ever knew that she had anything, any -- any e-mail**

8 **addresses.**

9 Q Did your office receive any inquiries of

10 whether or not she had an e-mail address?

11 MR. PEZZI: Objection. Foundation.

12 A **We have. But I don't know specifically**

13 **which cases.**

14 Q Were there any internal discussions in

15 your office or with other offices about

16 Mrs. Clinton -- Mrs. Clinton's e-mails?

17 MR. PEZZI: Objection. Form.

18 Foundation.

19 Q In 2014, at this time?

20 MR. PEZZI: Same objection.

21 A **In -- in 2014, I don't recall having a**

22 **meeting about that.**

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1 Q Were there any meetings about that after

2 2014?

3 MR. PEZZI: Objection. Form.

4 A **Are we talking about state.gov e-mails?**

5 Q Yes.

6 A **I don't recall when this happened. But I**

7 **remember a meeting asking our IRM group if**

8 **Mrs. Clinton had any state or e-mail accounts that**

9 **we were tracking.**

10 Q And who was at that meeting?

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

12 Q And when did you say that was?

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

14 Q Was she still in office at the time?

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

16 Q Do you recall around this time receiving

17 any FOIA requests for e-mails of any of

18 Mrs. Clinton's staff?

19 MR. PEZZI: Objection. Form.

20 A **Around that time, I don't know.**

21 Q I think earlier you mentioned that PST

22 files or e-mail searches were done through or with

95

1 the assistance of the -- of IRM?

2 A **Uh-huh.**

3 Q Information resource --

4 A **So just to clarify, there's -- and that's**

5 **why I don't want this to be confusing.**

6 **There is an actual office called IRM in**

7 **the State Department, and they handle most of the**

8 **building's electronic e-mail, stuff like that.**

9 **But then in our office in S/ES there is**

10 **an S/ES-IRM that works solely with us on e-mail**

11 **electronic IT issues.**

12 **So we would have worked with that IRM,**

13 **not the other one.**

14 Q The S/ES-IRM?

15 A **The S/ES-IRM.**

16 Q Do you recall ever seeing a picture of

17 Mrs. Clinton holding a BlackBerry?

18 A **Yes.**

19 Q Do you know when that was?

20 A **No.**

21 **Do you mean the picture or when I first**

22 **saw it?**

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1 Q When you first saw it.

2 A **No, I don't.**

3 Q And the meeting that you had with regard

4 to Mrs. Clinton's state.gov e-mail, who -- who

5 told you -- who told you anything about a

6 state.gov e-mail address?

7 A **I don't recall who that was.**

8 Q Were there concerns regarding

9 Mrs. Clinton's e-mail that were raised around

10 2014 --

11 MR. PEZZI: Objection. Form.

12 Q -- in your office?

13 MR. PEZZI: Objection. Foundation.

14 A **Not that I recall.**

15 Q At any point were there discussions

16 regarding an e-mail address for Mrs. Clinton?

17 A **Is this question up to present?**

18 Q No. At -- during her -- I apologize. In

19 2014.

20 MR. PEZZI: Objection. Foundation.

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

22 Q In the meeting that you had regarding

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1 Mrs. Clinton's e-mail address, what were you told
2 at that meeting?
3 MR. PEZZI: Objection. Form.
4 **A I don't exactly remember. But I believe**
5 **it was that there was no state.gov e-mail account**
6 **for the Secretary.**
7 Q And this was -- was this a formal
8 meeting?
9 MR. PEZZI: Objection. Form.
10 **A I don't recall.**
11 **To be honest, I don't recall if it was an**
12 **actual meeting or if I had heard it from Clarence**
13 **Finney. But I know the question would have been**
14 **given to S/ES-IRM.**
15 **So, again, I don't remember if I was in a**
16 **meeting or if I heard it. But I know that the**
17 **question would have definitely been directed. And**
18 **I believe I heard that answer.**
19 Q And what was the question?
20 **A Do we know of any e-mail addresses for**
21 **the Secretary of State Hillary Clinton.**
22 Q Was that a question that was directed at

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1 your office, or was that the product of a FOIA
2 request?
3 MR. PEZZI: Objection. Form.
4 **A That would have been a -- for us to**
5 **understand the searches and to look in the most**
6 **appropriate places, we would have likely asked**
7 **that question.**
8 **But, again, I don't recall how that came**
9 **up or when it happened.**
10 Q Can you explain that a little bit more?
11 So you said that the question would have
12 come up for you in your searches?
13 MR. PEZZI: Objection. Form.
14 **A So solely in the capacity of my position,**
15 **where I'm processing FOIA cases, if I'm asked to**
16 **search for something and it's not explicitly clear**
17 **where those records could be -- again, this is --**
18 **I don't recall this actual case or the time period**
19 **that this would have happened. But I believe I**
20 **would have talked to Clarence Finney.**
21 **And if we had a question about e-mail**
22 **addresses, obtaining PSTs, we would have had to**

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1 **contact S/ES-IRM, and they would have provided us**
2 **records or told us information that we did not**
3 **know.**
4 Q So this was for your own understanding or
5 it was in response to a FOIA request?
6 **A Potentially both.**
7 Q So when you first started in your
8 position back in 2011, did anyone tell you that --
9 that Mrs. Clinton had an e-mail address, or did
10 you ask so that you would know where to look for
11 records?
12 MR. PEZZI: Objection. Form.
13 **A I don't recall.**
14 **Well, let me clarify. You asked two**
15 **questions there. One was did anyone tell me**
16 **whether or not Hillary Clinton had an e-mail**
17 **address. I don't recall on that part.**
18 **But the second question, was I trained,**
19 **was I briefed on our systems, yes, I was trained**
20 **on how to use and operate and search within our**
21 **databases.**
22 Q And were you trained on searching

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1 e-mails?
2 **A At that time, I don't recall.**
3 Q Was there a point that you would have
4 been trained on how to search e-mails?
5 **A There would have been when we were**
6 **searching e-mails. But I don't recall what the**
7 **training was or when it started.**
8 Q When it started.
9 **A And I don't believe it would have been a**
10 **formal training, either. Searching Outlook is**
11 **pretty simple. I think they just would have**
12 **clarified how to do it.**
13 Q Is Outlook where the P -- where PST files
14 are held or maintained?
15 **A Currently or at the time of this FOIA?**
16 Q At the time of this FOIA.
17 **A They would have been PSTs at that time.**
18 MS. BURKE: Can we mark that Exhibit 7.
19 (Wasser Deposition Exhibit 7 marked for
20 identification, retained by counsel.)
21 Q So you've just been handed what's been
22 marked as Exhibit 7. If you could just take a

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1 look over it real quick.
2 **A Do you want me to read everything --**
3 Q No.
4 **A -- or ...**
5 Q Do you -- do you recognize the -- do you
6 recognize this document?
7 **A I don't recognize this document.**
8 Q Okay. I'm -- I'm going to represent to
9 you that this is a FOIA request that's dated
10 December 6, 2012, from Citizens For Responsibility
11 and Ethics in Washington.
12 **A Uh-huh.**
13 MS. BURKE: If we could mark these
14 Exhibit 8, Exhibit 9, and Exhibit 10.
15 (A discussion was held off the record.)
16 (Wasser Deposition Exhibit 8, Exhibit 9,
17 Exhibit 10, and Exhibit 11 marked for
18 identification, retained by counsel.)
19 THE WITNESS: I can say the exhibits,
20 just so we're all on the same reference.
21 Exhibit 8 appears to be the DS-1748.
22 Exhibit 9 is the cover sheet on top of

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1 the entire package February 26, 2013.
2 Exhibit 10 would have been the cover
3 sheet that I would have produced. The date was
4 February 14, 2013.
5 And then I see Exhibit 11 is the search
6 criteria form attached to this FOIA.
7 MS. BURKE: Thank you. I made it
8 difficult for everyone by separating them out.
9 BY MS. BURKE:
10 Q So as you've just described for the
11 record, the four documents that are in front of
12 you, are they -- what are they?
13 **A These four?**
14 Q Uh-huh.
15 **A So Exhibit 8 is a DS-1748 for FOIA Case**
16 **2012-40981. That was signed by me. I signed it**
17 **on February 14, 2013.**
18 Q And who was the requestor?
19 **A So up in the middle, on the top of the**
20 **page on Exhibit 8, you'll see Anne Weismann. And**
21 **I do see that in Exhibit 7, although it looks like**
22 **it was submitted by Anne Weismann, I would not be**

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1 **able to confirm if this is in fact the exact same**
2 **FOIA for 2012-40981.**
3 **It appears to be, but it's -- it's not**
4 **labeled as the same FOIA case number.**
5 Q If I -- I'm just going to draw your
6 attention to the tag at -- at the top of
7 Exhibit -- of both exhibits.
8 **A Uh-huh.**
9 Q U.S. Department of State Case Number
10 F-2016 -- strike that. I apologize.
11 **A Yeah, that's strange.**
12 Q This was -- these are documents that were
13 provided to Judicial Watch, the plaintiff in this
14 case, in regard to another FOIA case related to
15 this CREW request. So that is what that tag is.
16 **A Do you know what the request was?**
17 Q It is -- it is this case, this request in
18 Exhibit 7.
19 **A But it's a different FOIA number.**
20 Q That's a litigation number.
21 **A Okay. I think the litigation number is**
22 **the same as the FOIA request, though.**

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1 Q Yeah, the separate litigation was about
2 the processing of this request. So they are two
3 separate FOIA requests.
4 **A Two separate FOIA requests?**
5 Q Yes.
6 **A Okay.**
7 Q And I will represent to you that these
8 are the documents related to this specific CREW
9 request.
10 **A Okay. So the first request?**
11 Q Yes.
12 **A Not the 2016 one.**
13 Q Correct.
14 **A Okay. Thank you.**
15 Q And so these four -- four documents that
16 have been labeled as Exhibit 8, Exhibit 9, Exhibit
17 10, and Exhibit 11, is this -- are those what you
18 testified as a package or the -- the forms that
19 are related to a particular FOIA request?
20 **A Yeah, this looks like about the entirety**
21 **of a zero response package.**
22 Q And if there was -- if there were

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1 responses, would they be attached to this package?
 2 **A They would be.**
 3 Q And who was the management analyst on
 4 this FOIA request?
 5 **A That's me.**
 6 Q And this FOIA request is a Freedom of
 7 Information Act Case Number 2012-40981, requesting
 8 any e-mail accounts used by Secretary Hillary
 9 Clinton, even if they are not readily identifiable
 10 as her accounts.
 11 Is that an accurate statement as
 12 reflected in Exhibit 9?
 13 MR. PEZZI: Objection. Foundation.
 14 **A Can you say that again?**
 15 Q For identification purposes, this FOIA
 16 request was a Freedom of Information Act Number
 17 2012-40981, as reflected on Exhibit 9, described
 18 as requesting any e-mail accounts used by
 19 Secretary Hillary Clinton even if they are not
 20 readily identifiable as her accounts.
 21 Is that an accurate representation?
 22 MR. PEZZI: Objection. Form.

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1 Foundation.
 2 **A Of what is requested in the FOIA?**
 3 Q Yes.
 4 **A I think so.**
 5 Q And the date on this FOIA request was
 6 December 6, 2012.
 7 If you can look at Exhibit 11?
 8 **A Okay.**
 9 Q I think you had described before that the
 10 Search For, here it lists "Secretary Hillary
 11 Clinton," "Clinton," and "e-mail."
 12 MR. PEZZI: Objection. Form.
 13 Q What are those?
 14 **A The two search terms here?**
 15 Q Yes.
 16 **A Those would have been the search terms**
 17 **that we used in STARS, STePs, and CARS.**
 18 Q And who came up with those search terms?
 19 **A I don't recall.**
 20 Q But these are the search terms that were
 21 applied to this request, which was seeking e-mail
 22 accounts?

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1 MR. PEZZI: Objection. Form.
 2 Foundation.
 3 **A It appears that way.**
 4 Q And would e-mail accounts have been
 5 located in these databases as described, STARS,
 6 STePs, and CARS?
 7 MR. PEZZI: Objection. Form.
 8 Foundation.
 9 **A I was aware that e-mails were at times**
 10 **put into STARS. So if in fact we were looking for**
 11 **Hillary Clinton e-mails, using those search terms**
 12 **I believe, especially at that time, would have**
 13 **pulled up those records.**
 14 Q Her e-mail accounts?
 15 **A Any e-mails.**
 16 Q And -- and based on this document that's
 17 in front of you, is -- were those the only
 18 databases searched related to this request?
 19 MR. PEZZI: Objection. Foundation.
 20 Form.
 21 **A Just going off what these records say**
 22 **were searched, I'd have to rely on these. And**

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1 **they seem to match up. These were the databases**
 2 **that we searched.**
 3 Q And I think earlier you had -- had
 4 testified that sometimes you would make a request
 5 to the Secretary's office if there were potential
 6 records that were not in your -- that you did not
 7 have access to.
 8 MR. PEZZI: Objection. Form.
 9 Q Is that correct?
 10 **A I don't believe I said I specifically did**
 11 **it. But my office had the capacity to reach up,**
 12 **if we felt like there were more things that we did**
 13 **not have access to.**
 14 Q And how would you go about requesting the
 15 Secretary's office or the Secretary's staff for
 16 records that you did not have access to?
 17 **A At that time?**
 18 Q Yes.
 19 **A Specifically with all the cases we've**
 20 **discussed so far, I don't know.**
 21 Q Who would make that request?
 22 **A I believe Clarence Finney, but I don't**

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1 **know how he did it.**
2 Q Who told -- who -- who told you that
3 e-mails were included in the STePs -- I think you
4 said STePs -- STARS?
5 A **STARS.**
6 Q STARS. The STARS system?
7 A **It would have been discussed in maybe my**
8 **training when I started.**
9 **I at times -- and I don't recall specific**
10 **instances -- had seen e-mails that were uploaded**
11 **into it.**
12 **Again, it's not a system where you can**
13 **upload electronic records. So if, in fact, there**
14 **was an e-mail, hypothetically, printed out of**
15 **someone's Outlook account, it would then be**
16 **scanned into the system. And I would then search**
17 **using search terms to find that record.**
18 **So I -- I believe I recall seeing e-mails**
19 **in the system, and that's why we would have**
20 **searched there.**
21 Q Would you have searched an e-mail system?
22 MR. PEZZI: Objection. Form.

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1 A **I don't know what we did at that time.**
2 Q So the request here, the Citizens For
3 Responsibility and Ethics in Washington, the
4 request was made December 6, 2012. And it looks
5 like the due date as listed on Exhibit 11 is
6 Monday, January 21st, 2013.
7 So this was the time period that
8 Mrs. Clinton was still in office. Would you have
9 asked her or her staff to identify any e-mails in
10 response to this question -- to this request?
11 A **Are we sure she was still in office on**
12 **that date?**
13 Q She was in office until February 1st,
14 2013.
15 A **Okay. So can you repeat the question?**
16 Q In your search for records in response to
17 this FOIA request, would you have asked
18 Mrs. Clinton or her staff to identify the -- any
19 e-mail addresses as responsive to this FOIA
20 request?
21 A **So I don't recall exactly what we did in**
22 **this case. They either -- I mean, I don't know.**

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1 **I don't recall.**
2 Q In processing this request, there was a
3 zero records -- that's number of documents
4 retrieved. Correct?
5 A **It appears to be zero records, yes.**
6 Q So what did that mean to you?
7 A **At the time or now?**
8 Q At the time.
9 A **That we used those search terms that are**
10 **on Exhibit 11, and at the end -- at the conclusion**
11 **of my portion of this search, there were zero**
12 **records found that would have been any e-mail**
13 **accounts identifiable as, you know -- what you see**
14 **in Exhibit 7.**
15 Q And I understand that you said that you
16 don't recall specifically what happened with this
17 case. But with this type of a request, would you
18 have communicated with the Secretary's office or
19 her staff to determine whether or not -- I'm
20 sorry. Strike that.
21 Would you have communicated with the
22 Secretary's office in order to find responsive

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1 records that were outside the databases that were
2 within your -- your office?
3 A **At that time I don't recall if I would**
4 **have done that.**
5 Q Would you have asked S/ES-IRM if
6 Mrs. Clinton had any e-mail accounts?
7 A **As I stated before, I thought I recalled**
8 **a conversation like that, but I don't know when it**
9 **was. And I don't believe we were ever told of**
10 **identifiable e-mail addresses.**
11 **But, again, I don't remember the date of**
12 **when that took place.**
13 Q In your -- in 2014, or any time before,
14 between -- I'll say between 2011 and 2014, was it
15 ever your experience that the Secretary,
16 Mrs. Clinton, or any of her staff would take a
17 particular interest in FOIA requests?
18 A **No. I'm certain they knew of the FOIA**
19 **process, and the fact that the State Department**
20 **was getting FOIA requests. But, again, I don't --**
21 **I never had a interaction that would have led me**
22 **to believe they have a particular interest in any**

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1 particular FOIA request.

2 Q Did you interact with the Secretary's

3 office and her staff -- the Secretary, I'm sorry,

4 and her staff?

5 A Yes.

6 Q Did you ever notice Mrs. Clinton using a

7 BlackBerry?

8 A No. Except in the photo. That was I

9 believe the first time I saw it.

10 Q That was the first time you saw it?

11 When you saw the photo, was there -- what

12 were your thoughts about her use of a BlackBerry?

13 MR. PEZZI: Objection. Form.

14 A If it was 15 years ago, maybe that would

15 have stood out. But you'll walk around DC, you

16 see everyone with a phone. So it didn't

17 particularly strike me as obvious -- or strange.

18 Q And when you had this meeting that you

19 were informed that there was no e-mail address or

20 state.gov e-mail address for Mrs. Clinton, did

21 that strike a concern, given that she was

22 photographed using a BlackBerry?

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1 MR. PEZZI: Objection. Form.

2 A No.

3 Just as a side note, I also have a

4 personal phone and a work phone. And I think if

5 you looked at me, you wouldn't know which one was

6 which. So I don't usually find it odd that

7 someone is holding a phone.

8 Q What made you recall seeing the photo?

9 A Two side things about it.

10 It's not -- actually it had nothing to do

11 with Hillary Clinton. I thought the airplane

12 looked really interesting, the fact that it was a

13 military jet. A lot of empty space.

14 And, also, I had met one of the people

15 directly behind her, a blurry image of the person

16 behind her. So I thought it was cool that a

17 person that I knew was also in the photo.

18 Q So when you saw the photo, was it on your

19 own, or was it presented to you by someone else?

20 A I believe it was through media or

21 something that I saw online.

22 Q At the time that it was taken?

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1 A I don't know when the photo was taken.

2 I will say I don't recall ever having

3 been shown the photo in an official capacity by

4 anyone.

5 Q Did anyone in your office talk about the

6 photo and the BlackBerry at any time?

7 MR. PEZZI: Objection. Foundation.

8 A I really don't recall an instance. But

9 I'm sure the conversation happened. Mainly just,

10 Did you see that photo? But nothing work-related

11 to it.

12 Q Were there any discussions about her use

13 of a BlackBerry?

14 MR. PEZZI: Objection. Foundation.

15 A In what respect?

16 Q In general.

17 MR. PEZZI: Same objection.

18 Q In your office.

19 MR. PEZZI: Same objection.

20 A If -- if I could rephrase that.

21 Do you mean did anyone ever talk about

22 her holding a phone?

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1 Q About her using a BlackBerry.

2 A I'm sure a conversation happened about

3 Mrs. Clinton holding a BlackBerry, but I -- I

4 don't believe it was ever work-related or about

5 whether that was an e-mail address that was

6 government-related or private. I just don't

7 recall.

8 Q I believe it was last week Mr. Hackett,

9 John Hackett, was here. He was being deposed.

10 And he had mentioned there was a document that was

11 produced in a FOIA request case -- in a FOIA

12 request that identified Mrs. Clinton's private

13 e-mail.

14 Do you recall doing a FOIA search where

15 documents were produced that identified an e-mail

16 address for Mrs. Clinton?

17 MR. PEZZI: Objection. Form.

18 A I don't recall that.

19 MR. PEZZI: And can I just ask are we

20 approaching sort of a natural breaking point, just

21 because it's almost 1 o'clock, and I think we've

22 been going for a little over 90 minutes.

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1 I don't know if you're okay, but at some
 2 point we should probably break for lunch.
 3 MS. BURKE: Yeah.
 4 MR. PEZZI: But you tell me if you have a
 5 couple more minutes or want to finish this up.
 6 You okay?
 7 THE WITNESS: I'm fine.
 8 MS. BURKE: Why don't we take a short
 9 break real quick and then make a determination, if
 10 that's okay.
 11 MR. PEZZI: Okay.
 12 VIDEO SPECIALIST: We are going off the
 13 record at 12:57.
 14 (A recess was taken.)
 15 VIDEO SPECIALIST: We are back on the
 16 record at 14:05.
 17 BY MS. BURKE:
 18 Q Thank you, Mr. Wasser.
 19 A Yes.
 20 Q So I think before we -- we took a break
 21 and we broke for lunch, I was going through the
 22 CREW, the Citizens For Responsibility and Ethics

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1 in Washington, FOIA request from December 2012.
 2 I'm just going to follow up on a couple
 3 of things there, and then I think we'll probably
 4 move on from there.
 5 A Okay.
 6 Q So if you take a look at Exhibit 7.
 7 The request itself doesn't seem to
 8 specify that the e-mail accounts that they're
 9 looking for are state.gov e-mail accounts.
 10 At the time of this request, were you
 11 aware that Mrs. Clinton did not use a state.gov
 12 e-mail address?
 13 A Could you say that one more time?
 14 Q In December 2012, when this -- when you
 15 processed this FOIA request, were you aware that
 16 Mrs. Clinton did not use a state.gov e-mail
 17 address?
 18 A I really don't recall, but I don't
 19 believe that I did know of any e-mail address.
 20 Q And did you make any inquiry to whether
 21 or not she used an alternative e-mail address, or
 22 a personal e-mail address?

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1 A That I don't recall.
 2 Q Did you discuss the possibility of an
 3 alternative e-mail address with Mr. Finney?
 4 A I don't recall.
 5 Q How about with the Executive Secretary?
 6 A S/ES-IRM, or who do you mean?
 7 So the actual Executive Secretary?
 8 Q Yes.
 9 A That wouldn't have been me, if that
 10 conversation happened.
 11 Q Who would it have been?
 12 A Clarence Finney, or potentially others.
 13 Q Do you know if Mr. Finney raised the
 14 inquiry he received with the Executive Secretary
 15 regarding the state.gov e-mail account?
 16 MR. PEZZI: Objection. Foundation.
 17 A And which inquiry are you talking about?
 18 Q I believe I'm referring to a meeting that
 19 you -- you had mentioned that you had where there
 20 was an inquiry about a state.gov e-mail account?
 21 A Yeah. I actually don't recall, really,
 22 what meeting that would have been. I don't recall

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1 if it was a phone call, a passing conversation.
 2 I don't even remember who it was with.
 3 It's just information I thought I recalled
 4 knowing.
 5 Q Do you know who Tasha Thian is? Thian?
 6 A Thian.
 7 Q Thian.
 8 A Vaguely. I had met her maybe two or
 9 three times, but I didn't have a lot of
 10 communications with her.
 11 Q Was she the individual that raised the
 12 state.gov e-mail address?
 13 A I don't know. I don't think so.
 14 Q And with respect to the CREW request
 15 which -- specifically the e-mail addresses, did
 16 you raise the request, the FOIA request itself,
 17 with IRM, S/ES-IRM?
 18 A Can I ask, did you just say this request
 19 or her request?
 20 Q This --
 21 A This request.
 22 Q -- CREW request.

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1 **A Okay. I'm sorry. Can you say the**
 2 **question one more time?**
 3 Q With respect to this request, which
 4 relates to e-mail addresses identified.
 5 **A Uh-huh.**
 6 Q Did you raise this issue or have any
 7 discussions with S/ES-IRM?
 8 MR. PEZZI: Objection. Form.
 9 **A That I don't recall. I don't recall a**
 10 **meeting specifically in conjunction to this.**
 11 Q And, again, given that the request is for
 12 e-mail addresses, would it have -- have been a
 13 logical or reasonable search to search an e-mail
 14 system?
 15 MR. PEZZI: Objection. Form.
 16 **A An actual Outlook e-mail system or STARS**
 17 **in this context?**
 18 Q Something other than STARS. Other than
 19 the databases that were --
 20 **A At that time I believe we -- we thought**
 21 **that if there was something, we would have found**
 22 **it in those systems.**

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1 **Again, I'm not sure when and if we did**
 2 **have that conversation with S/ES-IRM about**
 3 **clarifying if we knew about any other e-mail**
 4 **addresses.**
 5 **So it's obviously -- it's not stated in**
 6 **here that we did ask the question. So I don't**
 7 **know when we asked the question or if -- or why we**
 8 **didn't represent it here. So it's tough to know**
 9 **that time frame.**
 10 Q And after you -- after you saw the
 11 picture with the BlackBerry, did you make any
 12 inquiry about a personal account that the
 13 Secretary may have used for state --
 14 **A No.**
 15 Q -- business?
 16 Did you discuss it with anyone in your
 17 office?
 18 **A Regarding the same question?**
 19 Q Yes.
 20 **A No.**
 21 Q Did you receive any specific instruction
 22 to only search e-mails on the state.gov accounts?

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1 **A So are you asking if there were**
 2 **nonstate.gov e-mails, if we would have sought**
 3 **them?**
 4 Q No. I'm asking with respect to the CREW,
 5 this particular FOIA request, were there any
 6 special instructions or directives that
 7 interpreted the request as state.gov e-mail
 8 accounts only?
 9 MR. PEZZI: And you can answer if you
 10 remember, except to the extent such instructions
 11 or directives would have come from State
 12 Department or Department of Justice attorneys.
 13 **A Well, this specific FOIA request I think**
 14 **is just asking for the number of e-mail accounts**
 15 **used. So it's not searching within any e-mails**
 16 **for anything, aside from whether or not an X**
 17 **number of e-mail accounts exist that were used by**
 18 **Hillary Clinton.**
 19 **Does that answer the question?**
 20 Q It does not.
 21 **A So you're asking --**
 22 Q Let me --

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1 **A -- if I --**
 2 Q Let me rephrase.
 3 **A Please.**
 4 Q I'm asking if, with regard to
 5 Mrs. Clinton's e-mail accounts, if you received --
 6 if there was any discussion or any instruction
 7 that the request related only to state.gov
 8 accounts.
 9 MR. PEZZI: And I'll make the same
 10 instruction.
 11 **A I don't believe we were ever told any**
 12 **guidance on how to conduct our search in that**
 13 **capacity.**
 14 **If we came across any e-mail accounts**
 15 **that were verifiably hers, we would have responded**
 16 **with that answer.**
 17 Q And are you aware of Cheryl Mills'
 18 interest in this specific FOIA request --
 19 **A No.**
 20 Q -- at the time?
 21 Did Cheryl Mills ever inquire into other
 22 FOIA requests or --

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125	<p>1 A With me, no. And not that I ever recall.</p> <p>2 Q With anyone in your office?</p> <p>3 A With anyone in my office.</p> <p>4 Q Did you ever speak with Cheryl Mills</p> <p>5 regarding Secretary Clinton's e-mail address?</p> <p>6 A I've never spoken to Cheryl Mills.</p> <p>7 Q Did you know that Cheryl Mills used a</p> <p>8 nonstate.gov e-mail address?</p> <p>9 A Then or now?</p> <p>10 Q Then.</p> <p>11 A No.</p> <p>12 Q Did Ms. Mills ever inform you or anyone</p> <p>13 in your office that Mrs. Clinton used a personal</p> <p>14 e-mail address for government -- government</p> <p>15 business?</p> <p>16 A I'm unaware if that conversation ever</p> <p>17 took place.</p> <p>18 Q Do you know who Heather Samuelson is?</p> <p>19 A I recognize the name, but I don't know</p> <p>20 who she is.</p> <p>21 Q Do you know who Sheryl Walter is?</p> <p>22 A Yes.</p>	127	<p>1 Q A record found.</p> <p>2 A No.</p> <p>3 Q Are you aware of a request for e-mails to</p> <p>4 this e-mail address around that same time,</p> <p>5 December 2012?</p> <p>6 MR. PEZZI: Objection. Form.</p> <p>7 A No, I -- I don't recall a FOIA like that.</p> <p>8 I don't know if it was dated, but I was</p> <p>9 processing on average a hundred to 150 cases a</p> <p>10 year, so the subjects kind of blend to me. I</p> <p>11 don't remember specific cases.</p> <p>12 Q Sure. I'm going to move away a little</p> <p>13 bit from the -- the CREW request we've been</p> <p>14 discussing right now.</p> <p>15 A Okay.</p> <p>16 Q Earlier in your testimony you mentioned</p> <p>17 that you are responsible for producing records or</p> <p>18 searching for and -- and pulling records to</p> <p>19 congressional inquiries?</p> <p>20 A Uh-huh.</p> <p>21 Q How long have you been handling that</p> <p>22 responsibility?</p>
126	<p>1 Q Who is she?</p> <p>2 A So I will say I don't recall really that</p> <p>3 much about her. I believe she worked at A bureau.</p> <p>4 I don't know what her position was. All I know is</p> <p>5 she worked, I believe, in the capacity of FOIA,</p> <p>6 but I don't know what her position was. I just</p> <p>7 remember seeing her name.</p> <p>8 Q Did you ever work with her?</p> <p>9 A I probably was in a meeting or several</p> <p>10 meetings with her. But, again, I don't remember</p> <p>11 those meetings. And I actually don't remember</p> <p>12 what she looked like. I -- she was just someone</p> <p>13 that worked at A bureau that I may have been at</p> <p>14 meetings with. But her name doesn't pop up as --</p> <p>15 with a face.</p> <p>16 Q I think I touched on this a little bit</p> <p>17 before lunch, and I just want to clarify.</p> <p>18 Do you recall a -- a FOIA request in or</p> <p>19 around December 2013 that produced records showing</p> <p>20 an e-mail address hdr22@clintonemail.com?</p> <p>21 A Was that a search term, or that was a</p> <p>22 record we found?</p>	128	<p>1 A So the time that I started the position</p> <p>2 in S/ES, which was in 2011, it was part of my job</p> <p>3 duties.</p> <p>4 There were times if I was on vacation or</p> <p>5 something that maybe someone else would process</p> <p>6 it. But generally I believe that I was the one</p> <p>7 completing congressionals on behalf of the</p> <p>8 Secretary's office, or ...</p> <p>9 Q And I know that the State Department does</p> <p>10 receive quite a high volume of FOIA requests.</p> <p>11 Along those lines, what kind of, numerically</p> <p>12 speaking, congressional inquiries do you get? Do</p> <p>13 you receive a significant amount of congressional</p> <p>14 inquiries, is it rare?</p> <p>15 A On a year-to-year basis, the numbers vary</p> <p>16 drastically.</p> <p>17 There are some years maybe we would --</p> <p>18 so, again, not -- I don't know the amount of</p> <p>19 congressional cases that come into the State</p> <p>20 Department, because I don't see them all. The</p> <p>21 ones that come to my desk, that I could talk</p> <p>22 about.</p>

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1 I would guess on average maybe it's --
 2 well, let me not even say that. On a low year
 3 maybe I get ten to 15. And sometimes I've seen
 4 upwards of 30 or more.
 5 Sometimes one request will be broken up
 6 into several individual requests. So I don't
 7 really see it as one letter from a Senator
 8 demanding 42 things; I just see 42 separate
 9 congressional requests. We get them at different
 10 times, so ...
 11 Q You said that not all congressional
 12 inquiries come to your desk.
 13 A Uh-huh.
 14 Q Is that because there is somebody else
 15 that handles them for the Office of the Secretary,
 16 or they go to a separate --
 17 A They would go to the respective office.
 18 Q Okay. Separate from the Office of the
 19 Secretary?
 20 A It depends on what the records are that
 21 they're looking for.
 22 Q Do you recall getting or processing a

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1 congressional inquiry in 2014 related to Benghazi?
 2 A No.
 3 Q At -- was it yesterday? Two days ago, I
 4 believe, Mr. Finney's deposition, we marked this
 5 document that I'm about to show you as Finney
 6 Exhibit 13.
 7 MS. BURKE: I'm not going to reintroduce
 8 it, but I will show it to the witness. I do not
 9 have copies for everyone.
 10 Q So I've just handed you what has been
 11 marked as Exhibit 13 in -- at Mr. Clarence
 12 Finney's deposition in this same case.
 13 If you could take a minute and just look
 14 over it.
 15 A The whole document, or is there any area
 16 of significance?
 17 Q Specifically the first page to
 18 familiarize yourself, and as well I'm going to be
 19 referring to a paragraph on Page 3.
 20 A Okay.
 21 Q Do you know what that is, that document
 22 that you --

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1 A I've never seen this document. At least
 2 I don't believe I have.
 3 And, actually, a letter coming from the
 4 Legislative Affairs to Congress is not something I
 5 would usually see.
 6 Q If you can turn to Page 3.
 7 A Okay.
 8 Q There at the top, I think the date is
 9 August 2014?
 10 A Okay.
 11 Q It's -- it's reference to the State
 12 Department, and I believe the Office of the
 13 Secretary, producing a number of records to
 14 Congress, several of which identify an
 15 hdr22@clintonemail.com records.
 16 Do you see that?
 17 A Yes.
 18 Q Were you aware of that release of records
 19 to Congress that was made to Congress in August of
 20 2014?
 21 A I don't believe I was.
 22 Q Were there any discussions around that

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1 time, August 2014, about records that were being
 2 released to Congress?
 3 A With me?
 4 Q It was in your office.
 5 A No, I don't recall being part of that
 6 conversation.
 7 Q Do you know who would have produced those
 8 records to Congress?
 9 A Well, from what I read in this letter, it
 10 either came solely from records attained by the
 11 Accountability Review Board or potentially there
 12 were additional taskers by H requesting more
 13 information. But again, I don't recall.
 14 Q What is H?
 15 A H is Legislative Affairs. This letter
 16 was drafted by Julia Frifield. She was the
 17 Assistant Secretary. And we call it H.
 18 Q Do you know of any -- I know that you
 19 just said that you did not have any discussions.
 20 But do you know of any discussions that happened
 21 around this time regarding Mrs. Clinton's personal
 22 e-mail address?

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1 **A Not that I recall.**
 2 Q Were you part of or did you have any
 3 responsibility of records management workshop
 4 training?
 5 **A Can you say that again?**
 6 Q Sure. Were you part of any -- were you
 7 part of doing a training for records management
 8 workshops?
 9 **A No.**
 10 Q Who --
 11 **A I don't believe I ever attended one, and**
 12 **I definitely was not a part of putting them on.**
 13 Q Did you have any role or responsibility
 14 in reviewing records when officials or employees
 15 left the State Department?
 16 **A No.**
 17 Q What's a Significant FOIA Report?
 18 **A My understanding of a Significant FOIA**
 19 **Report is that it would compile one or more FOIA**
 20 **requests. And I don't know what the -- the**
 21 **timeline for how many they would add, whether it**
 22 **was a day or a week.**

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1 **But they would select FOIAs that had just**
 2 **come in to the State Department. They hadn't**
 3 **actually been tasked yet, I don't believe. And**
 4 **they would send it to people to be aware that**
 5 **they're coming.**
 6 Q What people would they send it to?
 7 **A I don't know.**
 8 Q Would they send it to the Secretary's
 9 office?
 10 **A I'm aware of them having done that, but,**
 11 **again, I don't know the entirety of people that**
 12 **they send them to or what the reason is why they**
 13 **choose it.**
 14 Q Who is "they"?
 15 **A ABR sends the significant FOIA. Again,**
 16 **I -- I think. I don't know if anyone else does**
 17 **it, but those are the ones that I've seen.**
 18 Q And did they send them to Cheryl Mills?
 19 **A I don't know.**
 20 Q But you received them as well? Did you
 21 receive them --
 22 **A I have received them. Personally, I**

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1 **never really pay much attention to it, only**
 2 **because for me it's a nonstarter. It's not**
 3 **telling me anything.**
 4 **When I get a tasker, I know I have to log**
 5 **this and do work on it. For a Significant FOIA**
 6 **Report, it's not giving me anything. It's**
 7 **identifying that maybe you'll receive this FOIA**
 8 **request.**
 9 Q And do you recall any other recipients,
 10 besides yourself, of this, these significant FOIA
 11 requests?
 12 **A When?**
 13 Q In -- well, in 2012 through 2014.
 14 **A Well, it's -- it's odd. Because I don't**
 15 **ever recall asking to be part of the significant**
 16 **FOIA list. I know that I received them. So I**
 17 **don't know how they chose people to be on that**
 18 **list. And I generally wasn't looking at the cc**
 19 **line of who all these people were.**
 20 MS. BURKE: Can you mark this as Exhibit
 21 12.
 22 (Wasser Deposition Exhibit 12 marked for

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1 identification, retained by counsel.)
 2 Q So I've just handed you what's been
 3 marked as Exhibit 12. And this, I'll represent to
 4 you, this is -- was provided to Judicial Watch in
 5 response to a separate FOIA request regarding the
 6 processing of the CREW request.
 7 Who is Brock Johnson?
 8 **A Brock Johnson, I believe -- I mean, I**
 9 **could almost guarantee -- was a State Department**
 10 **employee. I'm not certain at all what his job**
 11 **title was. But I did see him on the seventh floor**
 12 **a lot.**
 13 **He also worked with the ARB. He worked**
 14 **closely with Cheryl Mills. But that's about all I**
 15 **know.**
 16 Q What is the ARB?
 17 **A As you'll see from the Exhibit 13 that**
 18 **you provided to Mr. Finney, the ARB was the**
 19 **Benghazi Accountability Review Board. And that's**
 20 **the one -- if I say "ARB," that's the one I refer**
 21 **to.**
 22 Q Okay. And it was specific to the

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1 Benghazi --
2 **A Uh-huh.**
3 Q You said you saw him a lot on the seventh
4 floor.
5 **A Uh-huh.**
6 Q What does -- what does that mean?
7 **A So that's the floor that I work on, with**
8 **the -- the Secretary's office is across the hall**
9 **from us. So I know he worked in some capacity**
10 **with Cheryl Mills. But, again, I don't know what**
11 **his job title was or responsibilities.**
12 Q Did you work with him?
13 **A In what context?**
14 Q In the FOIA context, or ...
15 **A In -- in FOIA, no. I don't recall ever**
16 **working with him regarding a FOIA.**
17 Q So what we just marked as --
18 **A Twelve.**
19 Q -- Exhibit 12, this is an e-mail
20 referencing what I was just asking you about, the
21 Significant FOIA Report.
22 **A Uh-huh.**

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1 Q And it was sent to Cheryl Mills. Is
2 that -- is that a usual thing, that Cheryl Mills
3 would receive these -- these kind of significant
4 FOIA reports?
5 MR. PEZZI: Objection. Foundation.
6 Form.
7 **A I don't know if it's -- what was the term**
8 **you used? Is it unusual?**
9 Q Yes.
10 **A I don't know if it's unusual, because I**
11 **may not have been on all of them. Clearly I was**
12 **on this one.**
13 **I recall receiving significant FOIA**
14 **reports. But, again, to me it wasn't unusual to**
15 **receive them. And I don't recall really looking**
16 **at who -- actually, do you see Cheryl Mills as a**
17 **receiver of this? I don't.**
18 Q She was -- it was forwarded to her
19 from --
20 **A It was forwarded to her. I don't see her**
21 **actually being. So clearly I wasn't on the**
22 **receiving end with her. So I don't know how many**

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1 **she saw or not.**
2 Q Who is Rosemary Reid?
3 **A I recall the name, but I have no idea who**
4 **she is.**
5 Q What is A staff collective?
6 **A I assume A staff collective is an A**
7 **bureau staff distribution list, but I -- I don't**
8 **want to say for certain what it is.**
9 Q Who is Eric Stein?
10 **A Eric Stein, at that time I don't know**
11 **what his position was. But currently he's the**
12 **director of -- John Hackett's position. Eric**
13 **Stein is in that capacity now.**
14 Q In IPS?
15 **A Yes. I don't know what he was doing in**
16 **2012, though.**
17 Q Who is Jonathan Davis?
18 **A Jonathan -- I thought it was Davies.**
19 **Davies.**
20 **He was a FOIA attorney that worked on**
21 **FOIA cases. Jonathan Davies, yeah.**
22 Q And how about Gene Smilanksy?

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1 **A I don't know what his position title was.**
2 **I believe he was an attorney for the State**
3 **Department, but I don't know in what capacity he**
4 **was working.**
5 Q So you'll notice that Brock Johnson
6 forwarded a Significant FOIA Report emphasizing,
7 or highlighting the CREW request regarding
8 Secretary Clinton's e-mail address to Cheryl
9 Mills.
10 **A Uh-huh.**
11 Q Do you think that Cheryl Mills should
12 have informed your office, who was processing
13 the -- the FOIA request, about Mrs. Clinton's
14 e-mail address, or e-mail account, when she knew
15 or learned of the CREW request?
16 MR. PEZZI: Objection. Form.
17 Foundation.
18 **A I don't know.**
19 Q Do you have an opinion -- strike that.
20 Did she inform your office at any point,
21 knowing that there was a FOIA request specifically
22 requesting Secretary Clinton's e-mail address?

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1 MR. PEZZI: Objection --
2 **A Not that I'm aware of.**
3 MR. PEZZI: -- form, foundation.
4 Q Is Brock Johnson still at the State
5 Department?
6 **A No. Well, right now I don't believe he**
7 **is. I believe after Secretary Clinton departed,**
8 **he left as well. And I'm quite certain of that.**
9 **I don't know if he ever came back, though.**
10 Q So he left at the same time that
11 Secretary Clinton did?
12 **A Not exactly. Or maybe he did. I -- I**
13 **don't know when he departed.**
14 Q Okay.
15 MS. BURKE: Can you mark this Exhibit 13.
16 (Wasser Deposition Exhibit 13 marked for
17 identification, retained by counsel.)
18 Q So you've just been handed what's been
19 marked as Exhibit 13. And I'm going to represent
20 to you that this is a printout. Although it does
21 have a state case number on the bottom, this is
22 something that we printed directly from the

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1 Department of State's website.
2 **A Okay.**
3 MR. PEZZI: And I'll just note for the
4 record it looks like it's a 364-page document, of
5 which Page 161 and Page 200 make up Exhibit 13.
6 Just for the record.
7 MS. BURKE: Yeah.
8 THE WITNESS: Good. Thank you.
9 Q I want to -- do you know what this is?
10 **A No.**
11 Q From my limited understanding, it appears
12 to be records -- or FOIA requests specifically to
13 the State Department. And I just want to draw
14 your attention to two specific ones.
15 About seven up on the first page, Number
16 F-2011-05059?
17 **A Uh-huh.**
18 Q The subject is, "E-mails from Huma Abedin
19 that mention the words 'husband' or 'Anthony
20 Weiner' or 'Weiner' or 'Anthony.'" And received
21 date of 6/16/2011.
22 Similarly on the second page, the second

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1 from the bottom, Case Number F-2011-06375. The
2 subject matter is "E-mails from Huma Abedin,
3 AbedinH@state.gov from 5/26/11 to 6/10/11,"
4 receive date 6/9/2011.
5 When you would receive or your office
6 would receive FOIA requests that specifically
7 sought e-mails, how did you go about searching for
8 those e-mails?
9 **A When?**
10 Q In two thousand -- well, here 2011, and
11 similarly as the years progressed up to 2014.
12 **A Well, in two thousand --**
13 MR. PEZZI: Objection. Form.
14 **A -- 2011 I didn't work in that office, so**
15 **I don't know.**
16 **So do you want to give me a specific**
17 **17 year?**
18 Q How about in 2014, if this was a similar
19 request. How would you go about or what would you
20 be -- what would the search entail looking for
21 specifically e-mails?
22 MR. PEZZI: Objection. Form.

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1 Foundation.
2 **A I'm not sure how well I can answer that.**
3 **Because it seemed there was a case where you saw**
4 **that we did do an e-mail search based on what we**
5 **believed would be the best place to look. And**
6 **possibly there were others where we didn't.**
7 **So I -- I can't say clearly how we did it**
8 **in 2014, or how we would have in 2011.**
9 Q Do you -- how about in 2012, when
10 Secretary Clinton was still in office?
11 **A Well, I would have searched in the -- in**
12 **the databases that were accessible to me in STARS.**
13 **And like I said, I would -- I would find e-mails**
14 **in there. It wasn't -- at the time I -- I thought**
15 **that would have been a good place to look.**
16 **So I would have looked in STARS.**
17 Q Would you have done -- done anything
18 else?
19 MR. PEZZI: Objection. Form.
20 **A For which case?**
21 Q For a case during that time period, that
22 was -- you know, a FOIA request that was

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1 requesting e-mails, say in 2012?

2 **A Well, we saw evidence of that in one of**

3 **the supplementals where we did get the PSTs for**

4 **those three people that you saw.**

5 **So, yes, we did do more on occasion.**

6 Q But you didn't in -- with regard to the

7 CREW request?

8 MR. PEZZI: Objection. Form.

9 **A I -- I don't recall how we did it.**

10 MS. BURKE: Mark that as Exhibit 14.

11 (Wasser Deposition Exhibit 14 marked for

12 identification, retained by counsel.)

13 Q You've just been handed what's marked as

14 Exhibit 14. For identification purposes, it is

15 tagged at the bottom DOS-897.

16 And I'll represent for the record that

17 this -- there appear to be two e-mails on here.

18 It's a heavily redacted document. This was

19 produced to us by your attorneys in the discovery

20 process for this case.

21 And the bottom e-mail appears to be an

22 e-mail from Clarence Finney to James Bair, with a

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1 copy to yourself and himself, Clarence, dated

2 Friday, August 8. And the subject matter is

3 "former Secretary e-mail account."

4 What was this e-mail in regards to?

5 **A Just to clarify, it does look like it's**

6 **three e-mails. It looks like the one here in the**

7 **middle was forwarded.**

8 Q Okay.

9 **A So just for the record.**

10 **I actually don't recall this e-mail, and**

11 **I'm not sure what is redacted here.**

12 Q How about based on the information that

13 is produced here?

14 **A Uh-huh.**

15 Q Such as the subject matter, "Former

16 Secretary e-mail account." Do you know what --

17 **A Are you asking what I recall from it?**

18 Q Yes.

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

20 Q If you saw an unredacted version of this

21 document, would that refresh your recollection?

22 **A Potentially. But I -- I don't even know**

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1 **what Secretary they're talking about here. There**

2 **were several.**

3 Q Do you recall around that time in August

4 of 2014 having discussions, or discussions taking

5 place about any former Secretary's e-mail address,

6 e-mail account?

7 **A I don't recall in 2014 having those**

8 **conversations. I think mainly when Clarence**

9 **Finney and others were giving deposition on the**

10 **Hill, in Congress, that's when I think I had a**

11 **full understanding about all the Secretaries'**

12 **e-mails, every Secretary that had an e-mail**

13 **account ever.**

14 **But at that time in 2014, I don't recall**

15 **this e-mail, and I don't know what they were**

16 **talking about here.**

17 Q When -- the testimony that you're talking

18 about, when Mr. Finney was before Congress on the

19 Hill, what was that time frame?

20 **A I don't recall exactly. Maybe between**

21 **2015, 2016. And I know it was on C-SPAN. We**

22 **watched most of it.**

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1 Q And what was the topic?

2 **A I think it was just general recordkeeping**

3 **for the State Department. Specifically I think it**

4 **may be looking more at Secretaries. I think they**

5 **tried making it specifically Hillary -- Hillary**

6 **Clinton, but it was a general understanding of**

7 **recordkeeping for Secretaries of State.**

8 **That's what I recall. There may have**

9 **been more. So, again, this -- this might be about**

10 **a general former Secretary e-mail accounts. I --**

11 **I don't know.**

12 Q I'm going to ask you about -- I think you

13 referenced them earlier, the 55,000 documents

14 that --

15 **A Pages.**

16 Q Pages, yes, that were returned to the

17 State Department by Mrs. Clinton.

18 Do you -- do you recall that, when that

19 happened?

20 **A Not specifically a date. But I remember**

21 **roughly seeing the boxes arrive, and us doing our**

22 **best to scan them electronically to -- to work**

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1 through that.
2 Q So when they arrived in your office, what
3 did you do?
4 A I believe Clarence Finney worked with --
5 well, as soon as they arrived, we -- we knew we
6 had to eventually very quickly perform searches on
7 the -- the material.
8 So we found -- we discussed with our
9 S/ES-IRM group about obtaining a high-speed
10 scanner that was reliable. And that was the first
11 step.
12 Q So directly upon arrival you began
13 scanning them? Is that --
14 A Within -- I don't know exactly how
15 quickly we did. But I recall us doing it pretty
16 quickly.
17 Q And this was for the purpose -- purposes
18 of responsiveness to future FOIA cases or prior
19 processed FOIA cases?
20 MR. PEZZI: Objection. Form.
21 Foundation.
22 A So I wouldn't say I know the entire scope

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1 to that.
2 For -- if -- if I had equity in it, it
3 would have been processing FOIA requests that we
4 were currently processing or had not yet
5 processed. I -- I know that there was also an
6 understanding that, through our office, we retire
7 records. But that, again, is a question that you
8 probably want to refer to Clarence Finney, because
9 I -- I don't know what other meanings we had
10 for --
11 Q Just so I'm clear, you're saying that the
12 55,000 -- with respect to the 55,000, the scope
13 that you had an understanding of was simply for
14 FOIA purposes.
15 A That would have --
16 MR. PEZZI: Objection. Form.
17 A That would have been my only part of
18 having it. And I -- I don't know any other reason
19 why we would have had them.
20 Q And when you had them scanned and entered
21 into your system, did you do any supplemental
22 searching for prior processed FOIA requests?

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1 A If we were asked to do supplemental
2 searches.
3 Q Who would have asked you to do such?
4 A Those cases generally would be sent back
5 to us by A bureau or the attorney's office.
6 Q And did you receive supplemental search
7 requests?
8 A Regarding the Hillary Clinton ones?
9 Q Yes.
10 A So we received a lot of Hillary Clinton
11 e-mail -- FOIA requests for her e-mails. I don't
12 know which ones were supplementals, and I don't
13 know which ones were fresh, new FOIA cases. But
14 we did process a lot of them. And I don't know
15 which ones were which.
16 Q Did you receive any requests in December
17 2014 related to Hillary Clinton e-mails?
18 MR. PEZZI: Objection. Form.
19 A Not that I recall. But I know that you
20 handed me some 2014 dates here. I don't know if
21 those were December.
22 But, again, I -- I don't recall

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1 specifically receiving any.
2 Q When was the -- when was your -- I don't
3 know if I'm going to use the right word here, but
4 processing of the 55,000 pages done in your
5 office?
6 A So you mean the --
7 MR. PEZZI: Objection. Objection. Form.
8 A I assume you're talking about scanning of
9 them?
10 Q Yes.
11 A I actually couldn't tell you
12 specifically.
13 Q Why not?
14 A Because I -- I don't remember the date or
15 month that we did that.
16 Q Do you know how long it took?
17 A We were told this -- this machine can do
18 5,000 pages per something. I -- I don't recall.
19 It seemed to go pretty quickly. But I
20 remember very quickly also we knew the records
21 that we were scanning didn't seem very reliable.
22 So that's why we -- the -- I don't know. A lot

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1 of, like, hiccups happened with the system. So we
 2 scanned it once or twice. And I don't remember
 3 actually when the first versus the second scanning
 4 took place.
 5 Q What did you mean by "not reliable,"
 6 the --
 7 A It seemed that as we were scanning
 8 documents, not all of them -- if -- if maybe even
 9 they gave us, like, two-sided, it wouldn't capture
 10 the second one.
 11 So I don't believe we did a lot of active
 12 searching on those records. Very quickly we
 13 realized as we were scanning it that it wasn't
 14 working well. So that's what I mean.
 15 So it was kind of a process. It wasn't
 16 just we dumped in 5500 -- 55,000 pages and it was
 17 done. It took a while to actually get through it
 18 all.
 19 Q So when they arrived in your office, this
 20 was around December 2014, at that time, December
 21 of 2014, you were clearly aware of the e-mail
 22 address hdr22@clintonemail.com?

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1 MR. PEZZI: Objection. Form.
 2 Foundation.
 3 A I don't recall exactly when I knew.
 4 Q Did you testify earlier that it wasn't
 5 until you received those documents?
 6 A Yes.
 7 Q Now having -- or knowing the Secretary --
 8 the former Secretary's e-mail address, what did
 9 you do -- strike that.
 10 Since processing this case, specifically
 11 the case that is in litigation right now, Judicial
 12 Watch, how have the searches or processing changed
 13 with regard to former Secretary's Clinton
 14 e-mail -- e-mails?
 15 MR. PEZZI: Objection. Form.
 16 Foundation. And beyond the scope.
 17 MS. BURKE: Are you instructing him not
 18 to answer?
 19 MR. PEZZI: No. Not for now.
 20 A So, again, we're saying how do we do
 21 these searches now? For Hillary -- for the HRC --
 22 as we call it, the HRC e-mail collection?

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1 Q Yes.
 2 A There was a time, and I don't know when
 3 it was, because we obviously were doing the HRC
 4 e-mail collection searches for some time. But
 5 then at a point we gave that responsibility back
 6 to A bureau.
 7 So right now as it stands, we do not
 8 search the HRC e-mail collection, A bureau does
 9 it. At least I believe they do.
 10 But certainly for a while, and maybe
 11 around this time -- I don't know when exactly --
 12 we were searching the HRC e-mail collection.
 13 Q How about with respect to this case; do
 14 you know who searched the HRC e-mail collection?
 15 MR. PEZZI: Objection. Form.
 16 A I didn't see -- in the -- this specific
 17 case, I didn't see mention that it was searched.
 18 So I don't know.
 19 Q If it had been searched, would it --
 20 would there have been a supplemental forms or --
 21 similar to the ones we saw earlier?
 22 A If it was from my office, yes.

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1 Q That's what would have been produced?
 2 A I believe so, yeah.
 3 Q So is it safe to say that they were not
 4 searched with respect to this request?
 5 A It's not safe to say that.
 6 MR. PEZZI: Objection. Form.
 7 Foundation.
 8 A Because maybe someone else did. I don't
 9 know.
 10 I know A bureau had the same records that
 11 we did. We took ownership of it at some time.
 12 But I don't know what A bureau would have done.
 13 MS. BURKE: Can you mark this Exhibit 15.
 14 (Wasser Deposition Exhibit 15 marked for
 15 identification, retained by counsel.)
 16 Q You had mentioned earlier that searches
 17 that come from your office at this time in 2014
 18 would have been done by yourself or perhaps
 19 Mr. Finney?
 20 A Yeah, I believe that's correct.
 21 Q If he -- or when he performs the sort --
 22 the search, does he provide the same type of

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1 documents that you issue when processing the FOIA
2 request?
3 MR. PEZZI: Objection. Foundation.
4 Q So I'm just going to point you to Exhibit
5 5.
6 **A Exhibit 5?**
7 Q Yes. Paragraph 17.
8 So it says "The Deputy Director of S/ES-S
9 applied the same search terms described above to
10 PDFs containing scanned images of a subset of
11 these documents." And the "these documents" is
12 referring to the 55,000 pages.
13 So the deputy director, was that
14 Mr. Finney?
15 **A Let me just read this first.**
16 **So I believe that's Clarence Finney.**
17 **Directory? Is that what it says, "the deputy**
18 **directory"?**
19 Q That's what it says.
20 **A Well, I don't know what a deputy**
21 **directory is. I'm assuming that's just a typo.**
22 **But, again, that could be something else. I don't**

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1 know.
2 **And I'm not really certain what, "applied**
3 **the same search terms described above see 2 PDFs**
4 **containing scanned images."**
5 **Those are the documents found? I don't**
6 **know what those are.**
7 Q So I think it refers back to Paragraph
8 12, which described the original search terms in
9 the initial search.
10 **A Okay.**
11 **Again, I didn't draft this, so I don't**
12 **really know the context. And if it says Clarence**
13 **Finney did the search, then I definitely wasn't**
14 **involved with that.**
15 Q But Mr. Finney would have provided the
16 same forms and documentation that you do on your
17 searches?
18 MR. PEZZI: Objection. Foundation.
19 **A I would be speculating. I assume he**
20 **would, but I don't know.**
21 Q I think I have even handed what's been
22 marked as Exhibit 17? Exhibit 16.

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1 MR. PEZZI: His is marked Exhibit 15, if
2 we're talking about the same one.
3 MS. BURKE: Exhibit 15, yes. Can I
4 replace -- I accidentally handed ...
5 (A discussion was held off the record.)
6 BY MS. BURKE:
7 Q For identification purposes, it's marked
8 at the bottom as DOS 672, and it is three pages.
9 It's an e-mail -- well, the first e-mail,
10 which is the e-mail on the bottom, appears to be
11 from James Bair to a number of people, including
12 yourself. And the subject matter is, "Litigation
13 hold regarding Judicial Watch FOIA request."
14 The e-mail is dated September 16, 2014.
15 What is a litigation hold?
16 **A To my understanding, a litigation hold is**
17 **when a -- in this context, when a FOIA request**
18 **goes into litigation, before the department does**
19 **anything, they put a hold on all records**
20 **potentially responsive to this.**
21 **So, for example, if -- whatever this case**
22 **is, we would get the hold notification to say,**

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1 **essentially, don't destroy records, don't delete.**
2 **But we don't delete or destroy anything. Our**
3 **office keeps every single thing that we've got,**
4 **essentially.**
5 **So this would have just been a notice to**
6 **us, also to let the principals know that there's a**
7 **litigation hold.**
8 Q Okay.
9 **A For this kind of record.**
10 Q And that's simply when it goes from
11 normal FOIA processing into litigation?
12 **A I don't know if we always get one.**
13 **Because, again, I -- I don't know how many cases**
14 **are always in litigation. But I do receive**
15 **litigation holds often.**
16 Q Okay.
17 MS. BURKE: This is Exhibit 16.
18 (Wasser Deposition Exhibit 16 marked for
19 identification, retained by counsel.)
20 Q You've been handed what's been marked as
21 Exhibit 16.
22 **A Uh-huh. Is this one e-mail chain?**

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1 Q Yes. It appears to be. However, I will
2 note for the record that the identification tag at
3 the bottom of each page individualizes each page.
4 And it runs from DOS-79 to DOS-83.
5 Again, this -- this is a document, or
6 these are documents that were produced to the
7 plaintiff in this discovery by your attorneys.
8 And I actually, if you could take a look
9 on the first page, the e-mail at the very bottom
10 is from Jonathon Wasser, to James Bair. And it
11 says "Do you also have the document that we sent
12 you? Not the ones that were produced to JW, but
13 the ones that we gave you?"
14 **A Uh-huh.**
15 Q And the subject matter is in reference to
16 this FOIA request that's in litigation right now.
17 What -- what was meant -- what did you
18 mean by that? What -- could you explain that?
19 **A So, again, are we certain this is one**
20 **e-mail chain that spans five months?**
21 Q Yes. As far as I read the documents that
22 were produced to us in this discovery.

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1 **A Okay. Well, I'll have to start from the**
2 **back and read forward to really understand.**
3 **Okay. Can you ask your question again?**
4 Q The e-mail on that first page, from you
5 to James Bair?
6 **A Uh-huh.**
7 Q "Do you also have the document that we
8 sent you? Not the ones that were produced to JW,
9 but the ones that we gave you."
10 **A I don't know specifically which document**
11 **we're talking about here. I think there were a**
12 **couple potential what I'll call productions that I**
13 **gave to A bureau and/or attorneys over that time.**
14 **Seemed like one was zero, one was two. Clarence**
15 **performed a search, I believe.**
16 **So I don't know what we're talking about**
17 **at this case. Because this would have been**
18 **processed -- this e-mail would have been sent**
19 **almost after all of those took place.**
20 Q So the document would be in reference to
21 a potential production?
22 **A I don't know what document that is.**

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1 Q If you go a little bit further up,
2 Mr. Bair's response is "Only in paper." And then
3 you respond, "Okay. I don't think Clarence wants
4 them anymore. But if that changes, may I get a
5 scanned copy? Once again, I don't think we'll be
6 asking for it."
7 Does that put anything into a little bit
8 better context?
9 **A No. I -- I'm not sure what that's**
10 **regarding.**
11 Q Okay. If you could turn to -- as you
12 pointed out, it is a lengthy e-mail chain.
13 **A Uh-huh.**
14 Q That I think started with the e-mail all
15 the way at the back on Page 80 -- or DOS-82.
16 **A Uh-huh.**
17 Q From Monica Tillery to you, in September
18 2014.
19 Do you recognize this e-mail?
20 **A Not specifically.**
21 Q Generally?
22 **A I mean, this kind of e-mail I recognize.**

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1 **But I don't recall this specific e-mail.**
2 Q And what do you mean, you recognize this
3 kind of e-mail?
4 **A FOIA taskers that come from either A**
5 **bureau or L.**
6 Q So when a FOIA request is tasked to your
7 office, this is --
8 **A No, not -- not always.**
9 **As I think I mentioned, there was some**
10 **time where we received a lot of them in paper**
11 **copy. And then this would be an example of one**
12 **that we got in electronic. And it's evolved since**
13 **there. So it's not always this case.**
14 Q So, and you'll notice the subject line
15 again, it's FOIA request, 2014-8848.
16 **A Uh-huh.**
17 Q Which is this litigation.
18 If you go down towards the bottom of the
19 e-mail itself, where there is a list -- a bulleted
20 list. In the third one down, Ms. Tillery asks
21 that you provide information of whether electronic
22 records were searched, including databases and

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1 e-mails.
2 **A Uh-huh.**
3 Q So at this time would e-mails have been
4 generally searched for a FOIA request?
5 MR. PEZZI: Objection. Form.
6 **A I don't know. It would have to be on a**
7 **case-to-case basis.**
8 Q So in 2014 it was sort of a case -- is
9 it -- am I correct in saying that it was a
10 case-by-case basis of whether e-mails were
11 searched in the FOIA request?
12 **A I don't recall exactly when we switched**
13 **over to having more use of PSTs from custodians,**
14 **people that we had their e-mail collections. So**
15 **I'm not going to be able to state when we started**
16 **doing it more, more commonly.**
17 **But here I -- I can only look at what we**
18 **did, and the records. So I don't know why we did**
19 **it. I would have maybe back then. Now I don't.**
20 MS. BURKE: Could we take about a
21 five-minute break?
22 MR. PEZZI: Absolutely.

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1 VIDEO SPECIALIST: We are going off the
2 record at 15:10.
3 (A recess was taken.)
4 VIDEO SPECIALIST: We are back on the
5 record at 15:21.
6 BY MS. BURKE:
7 Q Thank you, Mr. Wasser. I assure you
8 we're wrapping up here. Just followup with a
9 couple of questions. And I appreciate you, your
10 cooperation here today.
11 **A Uh-huh.**
12 Q With regard to the -- I think you were
13 calling them HRC e-mails.
14 **A HRC e-mail collection --**
15 Q Collection?
16 **A -- is what we called it.**
17 Q Was there any discussion in December of
18 2014 about searching e-mails in response to this
19 FOIA request?
20 **A Not that I recall.**
21 Q How about, setting aside the HRC e-mail
22 collection, generally searching e-mails in

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1 response to this FOIA request?
2 **A In December?**
3 Q In December of 2014.
4 **A I don't recall.**
5 Q How about in January of 2015?
6 **A I'd have to say that I don't recall any**
7 **date regarding this FOIA request that we would**
8 **have conducted searches on.**
9 Q Do you recall any discussions about
10 searching e-mails --
11 **A Yes.**
12 Q -- setting aside the date --
13 **A Yes.**
14 Q -- in response to this FOIA request?
15 **A No.**
16 Q Are you aware that in December 2014, the
17 State Department was attempting to settle this
18 matter with the plaintiff, this case?
19 **A No, not really.**
20 Q Could you expand on "not really"?
21 **A Yes. I would have been aware the case**
22 **was in litigation. But when it comes to the**

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1 **discussions between the attorneys and the**
2 **plaintiff, I don't know what those conversations**
3 **were.**
4 Q So you were not aware that there was an
5 attempt to settle.
6 **A I think by conducting the searches and**
7 **providing records, that time is an attempt to**
8 **settle. But I might be mistaken about what that**
9 **means.**
10 Q And I -- strike that.
11 Were you involved in -- in the search for
12 records requested by the Benghazi Accountability
13 Review Board?
14 **A Can you say that question again?**
15 Q The -- you had mentioned earlier about
16 the ARB, the Benghazi ARB, account --
17 Accountability Review Board having sent records to
18 Congress.
19 Were you involved in the search for
20 records requested by the ARB internally?
21 **A Yes.**
22 Q You were?

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1 A Yes.

2 Q When was that?

3 A I don't know specifically. It would have
4 been after September 11, 2012. But I don't know
5 when.

6 Q And in -- did that search retrieve any
7 records that indicated Secretary Clinton's e-mail
8 address?

9 MR. PEZZI: Objection. Foundation.
10 Form.

11 A I admit that I reviewed records that I
12 was pulling, but not with zealous scrutiny. So I
13 don't recall having seen the Secretary's e-mail
14 address in any capacity during that time.

15 Q Those records that you provided to the
16 accountability -- to the ARB, are they the same
17 records that were sent to Congress?

18 A I don't know.

19 Q Do you know how many records you produced
20 to the ARB?

21 A I couldn't tell you specifically, but it
22 was a lot.

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1 Q "A lot" like a thousand or --

2 A Maybe a thousand, maybe more.

3 Q The --

4 A It's hard to quantify because some of it
5 was electronic, some of it was paper. And in
6 looking at a stack of papers, I can't tell you how
7 many pages are in it.

8 Q And who tasked you with that search?

9 A Well, on a closer level, Clarence Finney
10 would have tasked me to do that search.

11 Above that, meaning where did the -- the
12 Search Tasker come from, I assume it was the ARB;
13 but I don't recall exactly where it came from.

14 Q And do you -- in -- in producing records
15 requested by the ARB, would you have completed
16 same or similar forms that we've been looking at
17 here -- I think it's Exhibit 1 and Exhibit 2 --
18 that you do for FOIA requests?

19 A I actually would generally like to say,
20 yes, we do. But that was a unique project that we
21 worked on. And I don't recall -- I don't recall
22 if I compiled a memo of all records we found.

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1 I would like to think we did, but I -- I
2 just don't recall.

3 Q So even if it weren't the same or
4 similar, would -- there would be something that
5 would reference your search and production?

6 MR. PEZZI: Objection. Form.

7 A Potentially.

8 It -- it would -- if the document
9 existed, it would look something similar to what
10 we've seen, search terms, people that we asked to
11 do additional searches, stuff like that.

12 But, again, I -- I don't recall if we
13 made one.

14 Q And did you search for e-mail from --
15 e-mails from Secretary Clinton's office?

16 A I don't recall.

17 Q Did you task other offices specific to
18 this request, the ARB request?

19 A Personally, I don't recall if I did.
20 Likely it would have been Clarence, if that was
21 done. Or maybe not even Clarence. Again, the ARB
22 was tasking, I believe.

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1 Q In any search for e-mails from Secretary
2 Clinton's office with respect to the ARB request,
3 who would have done that search?

4 MR. PEZZI: Objection. Foundation.

5 A Can you say that one more time?

6 Q With respect to a search for e-mails in
7 Secretary Clinton's office, with respect to this
8 ARB request and production, who -- who would
9 have -- who would have done that search? Would
10 that have been your office, or would it have been
11 tasked out?

12 A I can't say officially what happened.
13 I -- I know that we did do some work on records
14 sought. I don't know if ARB went directly to
15 other people or not.

16 But I -- I don't recall doing taskings to
17 the front offices.

18 Q So -- strike that.

19 You testified earlier that it's your
20 office is responsible for records from the
21 Secretary's office.

22 MR. PEZZI: Objection. Form.

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1 **A Yes, I did.**
2 Q Yes. So it would be your office that
3 would be tasked with a search for any records of
4 the Secretary's office?
5 **A I would say generally that's true. In**
6 **the rare cases of ARBs, I don't know if there were**
7 **any other taskings.**
8 **Again, I -- if the ARB was doing**
9 **additional taskings that went directly to**
10 **custodians that would have been in our purview, I**
11 **don't know.**
12 Q So you don't know if they specifically
13 tasked individual custodians with respect to this
14 request. Is that something they would normally do
15 when requesting records?
16 MR. PEZZI: Objection. Foundation.
17 **A Can you say that again?**
18 Q Is that something that they would
19 normally do, or had done in the past, is task --
20 themselves task --
21 **A This is for ARB purpose?**
22 Q Correct.

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1 **A To my recollection, I believe this was**
2 **the only ARB I was ever involved with.**
3 **There have been others, but I don't know**
4 **the details of them. This is the only one I**
5 **remember specifically working on.**
6 Q Did your office do the search through
7 records that were returned by former Secretary
8 Clinton's staff, Jacob Sullivan, Huma Abedin, and
9 Cheryl Mills?
10 MR. PEZZI: Objection. Form.
11 **A I -- I really don't know. I -- I don't**
12 **think we were, but I -- I think it was strictly**
13 **the HRC portion of those e-mails.**
14 **Actually, I'm quite certain now.**
15 **Definitely we only focused on the HRC e-mail**
16 **collection. For the other people, those were**
17 **provided to A bureau, and we did not perform those**
18 **searches.**
19 Q With regard to the ARB request, were
20 there any discussions about how to search e-mails
21 from the -- Secretary Clinton's office for Cheryl
22 Mills or Jacob Sullivan or any of the rest of the

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1 staff?
2 MR. PEZZI: Objection.
3 **A Not that I recall.**
4 Q The initial search with relation to this
5 request, this litigation -- I believe it was
6 Exhibit 1 -- showed a date range through December
7 2012.
8 Was there ever a search supplemented, so
9 that the date range would run through Secretary
10 Clinton's tenure, through the beginning of
11 February --
12 MR. PEZZI: Objection.
13 Q -- 2013?
14 MR. PEZZI: Sorry.
15 Objection. Foundation.
16 **A There -- you've provided me a lot of**
17 **documents today. And I see different date ranges**
18 **on some. Some of which I believe I conducted;**
19 **some I don't know.**
20 **So I can't give you an honest answer to**
21 **that, because I don't know what all the date**
22 **ranges were.**

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1 **And even if I do, I don't recall, even**
2 **from this information you provided. I mean, if**
3 **you hand me specific examples -- I mean, this one**
4 **clearly we didn't do to present.**
5 Q When you came on board as management
6 analyst, who provided you training for the system
7 of records and e-mails?
8 **A It was kind of a village raises the**
9 **person. There are a lot of people in the office**
10 **that showed me different aspects of the databases.**
11 **Clarence Finney certainly provided me a**
12 **bulk of that. There was another colleague who was**
13 **not really my supervisor, but he was in a**
14 **supervisory position for the other people in the**
15 **office, who also did a lot of training with me.**
16 Q Who was that?
17 **A Corey Nightingale. He definitely**
18 **provided training for me as well. Again --**
19 Q How do you spell Nightingale?
20 **A I haven't spelled it in a long time.**
21 **I -- I don't know. He still works for government,**
22 **so his name would probably be searchable.**

Conducted on June 6, 2019

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1 Q How about John Bentel; did he train you
 2 on anything?
 3 MR. PEZZI: Objection. Beyond the scope.
 4 A **No.**
 5 Q With respect to the ARB production, or
 6 response to the ARB request, was Cheryl Mills
 7 involved in searching records?
 8 MR. PEZZI: Objection. Foundation.
 9 A **I don't recall her being involved. She**
 10 **may have been. I don't know.**
 11 Q Was there anyone from the Secretary's
 12 office that was involved in the search?
 13 A **I don't know.**
 14 MS. BURKE: I think that's all I have,
 15 but just give me one moment.
 16 Q If I can -- I'm just going to ask you.
 17 Knowing what you know now about Secretary
 18 Clinton's e-mail use while at the State
 19 Department, do you think that she or her staff
 20 should have informed your office about the
 21 Clintonemail.com account and use for business
 22 purposes?

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1 MR. PEZZI: Objection. Form.
 2 A **I think they did. They provided them,**
 3 **did they not?**
 4 Q They provided you -- when?
 5 A **It appears after she had departed. I'm,**
 6 **again, not deeply learned with all of the records**
 7 **management. But I think it's up to them to get**
 8 **the records back at some timely fashion.**
 9 Q How about at the time while she was in
 10 office and you were receiving FOIA requests; do
 11 you think that they should have informed you that
 12 there was a personal e-mail that was being used
 13 for State Department business?
 14 MR. PEZZI: Objection. Form.
 15 A **Is that an opinion of mine?**
 16 Q It's a question.
 17 A **I don't really have an opinion on it.**
 18 MS. BURKE: I think that's all I have.
 19 Q When were you first aware -- regarding
 20 the HRC e-mail collection, when were you first
 21 aware that the State Department would be seeking
 22 Secretary Clinton to return records?

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1 A **Before we received it?**
 2 Q Yes.
 3 A **I'm not aware when that happened.**
 4 Q So when did you first become aware that
 5 Secretary Clinton would be returning documents to
 6 your office, or to the State Department?
 7 A **It would -- it would be speculation, I**
 8 **think.**
 9 **Probably around the time we received**
 10 **them. I know I didn't have -- I wasn't a part of**
 11 **any group that had a heads-up on it, if anyone did**
 12 **know.**
 13 Q Were there any discussions around the
 14 office?
 15 A **It only would have been around the time**
 16 **that we received the records in hard copy. But I**
 17 **don't recall how much heads-up we had.**
 18 MS. BURKE: I think we're all done on our
 19 side.
 20 MR. PEZZI: I have no questions.
 21 VIDEO SPECIALIST: If there are no
 22 further questions then this ends the deposition,

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1 and we are going off the record at 15:37.
 2 COURT REPORTER: Mr. Pezzi, usual order;
 3 copy, daily?
 4 MR. PEZZI: Yes.
 5 (Off the record at 3:37 p.m.)
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1 ACKNOWLEDGMENT OF DEPONENT

2 I, JONATHON DAVID WASSER, 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 6th day of June, 2019.

14
15 My commission expires:
16 September 14, 2023



17 _____
18
19 NOTARY PUBLIC IN AND FOR THE
20 DISTRICT OF COLUMBIA

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