



**Date:** December 7, 2022

**Case:** In Re: Rudolph W. Giuliani



Ace-Federal Reporters, Inc.  
Phone: 202-347-3700  
Fax: 202-737-3638  
Email: [info@acefederal.com](mailto:info@acefederal.com)  
Internet: [www.acefederal.com](http://www.acefederal.com)

DISTRICT OF COLUMBIA COURT OF APPEALS  
BOARD ON PROFESSIONAL RESPONSIBILITY  
AD HOC HEARING COMMITTEE

- - - - - X

In the Matter of,	Board Docket No.
RUDOLPH GIULIANI,	22-BD-027
Respondent.	Disciplinary Docket No.
A Temporarily Suspended Member	2020-D253
of the Bar of the District of	Vol. 3
Columbia Court of Appeals.	:
Bar Number: 237255	:

- - - - - X

Wednesday, December 7, 2022

CONTINUED VIRTUAL HEARING OF  
RUDOLPH GIULIANI

Reported by

Kim M. Brantley, C.S.R.

Page 632

1 Continued virtual hearing, taken via Zoom,  
2 commencing at 9:02 a.m., before the Ad Hoc Hearing  
3 Committee, and before Kim M. Brantley, a Court  
4 Reporter and Notary Public in and for the District  
5 of Columbia, when were present on behalf of the  
6 respective parties:  
7  
8  
9  
10  
11  
12  
13  
14  
15  
16  
17  
18  
19  
20  
21  
22

Page 633

1 APPEARANCES:  
2 Ad Hoc Hearing Committee:  
3 ROBERT C. BERNIUS, ESQUIRE  
4 Chair  
5 MS. CAROLYN HAYNESWORTH-MURRELL  
6 Public Member  
7 JAY BROZOST, ESQUIRE  
8 Attorney Member  
9  
10 On behalf of the DC Attorney Disciplinary  
11 System:  
12 HAMILTON P. FOX, III, ESQUIRE  
13 Disciplinary Counsel  
14 JASON HORRELL, ESQUIRE  
15 Assistant Disciplinary Counsel  
16 515 Fifth Street NW, Ste. A-117  
17 Washington, DC 20001  
18 (202) 638-1501  
19  
20  
21  
22

Page 634

1 APPEARANCES CONTINUED:  
2 On behalf of Respondent:  
3 HON. JOHN M. LEVENTHAL, (RET.) ESQUIRE  
4 HON. BARRY KAMINS, (RET.) ESQUIRE  
5 AIDALA, BERTUNA & KAMINS, PC  
6 546 Fifth Avenue - Sixth Floor  
7 New York, New York 10036  
8 (212) 486-0011 E-mail  
9 Email: judgeleventhal@aidalalaw.com  
10 ALSO PRESENT:  
11 AZADEH MATINPOUR, Paralegal  
12 DC Disciplinary Counsel  
13  
14 JOHN ESPOSITO, Esquire  
15 Aidala Bertuna & Kamins, PC  
16  
17 JON ORTIZ, ESQUIRE  
18 DC Disciplinary Counsel Expert Witness  
19  
20 JIM PHALEN, ESQUIRE  
21 MEGHAN BORAZZAS, Staff  
22 Office of the Executive Attorney

Page 635

1 I N D E X  
2 DISCIPLINARY COUNSEL'S CASE:  
3 WITNESSES: DIRECT: CROSS:  
4 Daniel Ortiz 637, 708,727 654, 729  
5  
6 RESPONDENT'S CASE:  
7 WITNESSES: DIRECT: CROSS:  
8 Corey Lewandowski 733 (none)  
9 John Droz 751, 785 781  
10 Christina Bobb 790 (none)  
11 Bernard Kerik 810, 842, 850  
12 839, 842, 847, 853 (voir dire by Mr. Fox)  
13 Rudolph Giuliani 859 943  
14  
15  
16  
17  
18  
19  
20  
21  
22

Page 636

1           P R O C E E D I N G S  
2           CHAIRMAN BERNIUS: Good morning. Is  
3 there anything we need to discuss before we begin  
4 with Mr. Fox's questioning?  
5           MR. FOX: Not from me.  
6           MR. KAMINS: Mr. Chair, only one  
7 matter. We were attempting to contact one of our  
8 witnesses last night who was supposed to be the  
9 first witness, and he was flying out to Denver.  
10 So hopefully he will -- if he's not in the waiting  
11 room when we get ready for him, then we'll call  
12 Mr. Droz as our first witness.  
13           CHAIRMAN BERNIUS: Okay, great.  
14           Mr. Fox, you may proceed.  
15           MR. FOX: Yeah, I apologize. My  
16 background has somehow disappeared on me and I'm  
17 not mechanically able to put the right one up.  
18 I'll fix that at a break. So you see my sloppy  
19 office.  
20           (Whereupon Daniel Ortiz resumed the  
21 witness stand.)  
22

Page 637

1           CONTINUED DIRECT EXAMINATION  
2           ON BEHALF OF DISCIPLINARY COUNSEL  
3           BY MR. FOX:  
4           Q. Mr. Ortiz, yesterday when we had just  
5 finished discussing the -- Judge Brann's opinion  
6 for the district court in the case that Mr.  
7 Giuliani argued, and I now want to switch to the  
8 opinion of the Third Circuit Court of Appeals in  
9 that same matter.  
10           MR. FOX: And I would ask that we put  
11 up exhibit -- Disciplinary Counsel Exhibit 16,  
12 please.  
13 BY MR. FOX:  
14           Q. And I think we identified this last  
15 time as the opinion. And I want to go to page  
16 nine, but first I want to ask you, did the Third  
17 Circuit rule on whether there was -- did the Third  
18 Circuit issue a ruling on the Electors and  
19 Election Clause claim that had been included in  
20 the complaint before the district court?  
21           A. No, sir.  
22           Q. Okay. And why was that?

Page 638

1           A. The Third Circuit said that the  
2 plaintiffs had not challenged the district court's  
3 withholding on those issues.  
4           MR. FOX: And if -- if you would put  
5 up, please, the -- the second full paragraph on  
6 the second column. If you would highlight that  
7 for us -- no, down one. That one, that's right.  
8 BY MR. FOX:  
9           Q. And -- and is this the language which  
10 the -- that you referred to that the -- where the  
11 Third Circuit discussed the clause?  
12           A. Yes, sir.  
13           Q. There's a case there called I guess --  
14 I don't know; I suppose it's Bognet; I'm not  
15 sure -- vs. Secretary Commonwealth of  
16 Pennsylvania.  
17           Are you familiar with that case?  
18           A. Yes, sir. I read it in my original  
19 preparation for the report back in April.  
20           Q. Okay, and the -- it's cited for the  
21 proposition that the campaign concedes that under  
22 our recent decision it lacks standing to pursue

Page 639

1           alleged violations of those causes?  
2           A. Yes, sir.  
3           Q. And -- and what did the case hold in  
4 that regard?  
5           A. The case hold that the campaign did not  
6 have an injury in fact. It's one of the three  
7 required elements of standing in most cases.  
8           Q. And that's just -- that's for the  
9 Electors and Election Clause counts?  
10           A. Yes, sir.  
11           Q. Okay. Now let's talk about the  
12 argument that Mr. Giuliani discussed as to whether  
13 Due Process required the states to have poll  
14 watchers and observers.  
15           Did the Third Circuit deal with that  
16 issue?  
17           A. Yes, sir.  
18           MR. FOX: And if we could put up the  
19 paragraph above the one that we just looked at.  
20 BY MR. FOX:  
21           Q. Is this the discussion from the Third  
22 Circuit?

Page 640

1 A. Yes, sir.  
2 Q. And just read that to us, please.  
3 A. Sure. "Count seven alleges that  
4 Philadelphia's Board of Elections violated Due  
5 Process by obstructing poll watchers and  
6 representatives, but nothing in the Due Process  
7 Clause requires having poll watchers or  
8 representatives, let alone watchers from outside a  
9 county or less than 18 feet away from the nearest  
10 table.  
11 "The campaign cites no authority for  
12 those propositions and we know of none; ditto for  
13 Notice and Cure procedures. And the campaign  
14 litigated and lost that claim under state law,  
15 too.  
16 "The Pennsylvania Supreme Court held  
17 that the election code required only that poll  
18 watchers be in the room, not that they be within  
19 any specific distance of the ballot." And then it  
20 cited In Re Canvassing Observation.  
21 Q. Okay. And finally, with respect to  
22 this opinion for the Third Circuit, did it discuss

Page 641

1 whether there were -- did it discuss whether the  
2 campaign had brought allegations of improper vote  
3 counting?  
4 A. Yes, sir.  
5 MR. FOX: Let's go to the next page and  
6 highlight the paragraph right at the very top of  
7 the page. This will be on page 10 -- nine,  
8 sorry -- 10, 10, sorry. And -- and if you'll just  
9 highlight that top paragraph really. I know it  
10 starts on that page. There we go. Thank you.  
11 BY MR. FOX:  
12 Q. And then, beginning after it lays out  
13 the various counts, could you read us the language  
14 that begins with the word "none".  
15 A. "None of these counts alleges facts  
16 showing improper vote counting and none alleges  
17 facts showing that the Trump Campaign was singled  
18 out for adverse treatment.  
19 "The campaign cites no authority  
20 suggesting an act or discriminates by treating  
21 people equally while harboring a partisan motive,  
22 and we know of none."

Page 642

1 MR. FOX: And finally let's look at  
2 page 12, and the -- the first full paragraph in  
3 the second column, if that could be highlighted.  
4 BY MR. FOX:  
5 Q. And is this the ruling as to whether  
6 there was the -- the campaign had made a  
7 sufficient -- allegations to avoid a motion to  
8 dismiss?  
9 A. Yes, sir. That paragraph is doing  
10 several things, that among them.  
11 Q. Okay. First of all, just read that to  
12 us, if you will.  
13 A. "Seeking to turn those state law claims  
14 into federal ones, the campaign claims  
15 discrimination. But it's alchemy cannot transmute  
16 lead into gold.  
17 "The campaign never alleges that any  
18 ballot was fraudulent or cast by an illegal voter.  
19 It never alleges that any defendant treated the  
20 Trump campaign or its votes worse than it treated  
21 the Biden campaign or its votes. Calling  
22 something 'discrimination' does not make it so.

Page 643

1 "The second appended complaint still  
2 suffers from these core defects, so granting leave  
3 to amend would have been futile."  
4 Q. Now would you tell us, Mr. Ortiz, what  
5 is Federal Rule of Civil Procedure 8?  
6 A. Federal Rule of Civil Procedure 8 is  
7 the rule that, among other things, lays out the  
8 requirements for valid pleading.  
9 Q. And in -- in -- in a non-fraud case,  
10 what are those requirements?  
11 A. That the -- basically the claim state  
12 in a plain and concise way the elements of the  
13 claim.  
14 Q. And did the Third Circuit rule as to  
15 whether this complaint -- these complaints met the  
16 standards of Rule 8?  
17 A. Yes, sir.  
18 Q. And what did it say about that?  
19 A. It said that they did not meet the  
20 standards of Rule 8, let alone the standards of  
21 Rule 9.  
22 Q. And there's a citation in the opinion

1 to a case called Iqbal, I-q-b-a-l.  
2 A. Yes, sir.  
3 Q. What's the Iqbal case?  
4 A. The Iqbal case sat -- lays out -- it  
5 follows another case called Twombly, and together  
6 they lay out what the pleading requirements are  
7 under Rule -- pleading standards are for adequate  
8 pleading under Rule 8. It's known as the  
9 plausibility standard. And basically what you do  
10 is you take any allegations that are conclusory  
11 and you just ignore them. They are just read out  
12 of the complaint. And then you look at all the  
13 other allegations and you weigh them against other  
14 possible alternative stories that they are  
15 consistent with, and you decide whether the -- the  
16 story that the plaintiff is asserting is the most  
17 plausible one among those.  
18 Q. And so the Third Circuit said it didn't  
19 meet the Rule 8 standards and didn't -- did it  
20 even reach the Rule 9 issue?  
21 A. No, sir.  
22 Q. Okay. All right, that's all I have

1 about this opinion, but I do want to ask you about  
2 one other case called Ritter vs. Migliori, which  
3 Mr. Giuliani discussed yesterday I guess in his --  
4 counsel's examination.  
5 Can you tell us about that case, what  
6 the procedural posture was, what the issues were  
7 and so forth?  
8 A. It's very complicated, so I will try.  
9 It concerned a -- I believe a judicial  
10 election in the State of Pennsylvania and the --  
11 the judicial election, the plaintiff sought to  
12 attack the -- among other things, the Notice and  
13 Cure features, procedures, and it was brought in  
14 federal court and the -- sorry, let me step back.  
15 It was actually brought by the --  
16 the -- that case was brought by the -- I'm just  
17 confusing it with another one. That case was  
18 brought by I believe the democratic party and it's  
19 individual plaintiffs, and they were seeking a  
20 declaration that, under the federal Voting Rights  
21 Act, as amended, which has a provision that says  
22 that votes not meeting all the technical

1 requirements have to be processed whenever those  
2 requirements are not material. And in -- it went  
3 up though the federal court system, and the Third  
4 Circuit, before the election, said that the Notice  
5 and Cure -- the Notice and Cure was appropriate  
6 because -- or that -- that these ballots could not  
7 be rejected for these kind of technical defects  
8 due to the federal law. And then a stay  
9 application was brought before the Supreme Court,  
10 which was referred to yesterday, and the Supreme  
11 Court refused to issue a stay of that ruling,  
12 which would have allowed defects to have been  
13 noted and ballots to be rejected on that basis.  
14 Then after the election, the Supreme  
15 Court issued another order, which was discussed  
16 yesterday. This was the one where it granted  
17 certiorari in the case and then vacated the  
18 decision below as moot.  
19 So, we have this sort of standard at  
20 that point after the election I believe it was.  
21 There the ruling didn't really matter in that case  
22 and so a so-called Munson-Ware (phon) order was

1 sought, which leads to the vacatur of the opinion  
2 below when things are moot. And that was what --  
3 since the decision no longer made any difference  
4 in that case, that is what the Supreme Court did.  
5 Q. And there was a dissent that was -- I  
6 think Mr. Giuliani read from yesterday. What was  
7 that dissent to?  
8 A. The dissent was to the denial of the  
9 stay application prior to the election.  
10 Q. All right. I want to turn next to Rule  
11 11 of the Federal Rules of Civil Procedure.  
12 Can you tell us, what is Rule 11?  
13 A. Rule 11 is a provision that says  
14 whenever a -- an attorney submits a paper outside  
15 of the discovery process, the attorney has to  
16 verify it with his or her signature, and when the  
17 attorney signs the paper, that is taken as  
18 attesting to three different things: First, that  
19 the paper, the pleading, or just the paper is not  
20 being submitted for any improper purpose,  
21 secondly, that it is well founded in law, and two  
22 that it is well founded in fact -- and three is

Page 648

1 well founded in fact.  
2 Q. And -- and if a lawyer violates Rule  
3 11, does the rule under some circumstances allow  
4 for sanctions to be imposed?  
5 A. Yes. There are two ways that sanctions  
6 can be granted: first, if the opposing parties  
7 serve on the attorney a motion to basically -- you  
8 know, saying they're seeking -- they're going to  
9 be seeking Rule 11 sanctions. After 21 days, if  
10 the attorney has not withdrawn or corrected the  
11 submission, the other side can actually file that  
12 motion in court and initiate court proceedings.  
13 In some circumstances -- judges also  
14 have the discretion in some circumstances to sua  
15 sponte -- meaning even when a party doesn't ask  
16 them to -- initiate Rule 11 sanctioning  
17 procedures.  
18 Q. So let's turn to the first one where  
19 the -- the party opponent might ask for Rule 11  
20 sanctions.  
21 Can the party opponent do so without  
22 giving the twenty-one-day notice?

Page 649

1 A. No. The -- the party can serve the  
2 motion, but the party cannot file it with the  
3 court.  
4 Q. Okay. In this case, the district court  
5 case in front of Judge Brann, would it have been  
6 possible for the defendants to have sought Rule 11  
7 sanctions?  
8 A. Practically not. I believe that no one  
9 actually anticipated that this case in the  
10 district court was going to go into December,  
11 since December 8th was the safe harbor deadline  
12 under the Electoral Count Act. I think everyone  
13 anticipated that there would be a -- things would  
14 be moved along certainly in the district court  
15 quickly enough that there could be at least an  
16 appeal to the Third Circuit and maybe a cert  
17 petition filed for review before the Supreme  
18 Court.  
19 Q. And you mean filed within the  
20 twenty-one-day period. Is that what you're  
21 talking about?  
22 A. Yes. No, the twenty-one-day period I

Page 650

1 think would have -- let's see. The initial  
2 complaint was filed I believe on November the 9th.  
3 You had 21 days -- after -- you have to wait 21  
4 days. So the first day that the motion could be  
5 -- any motion could be filed in the court would I  
6 believe have been December 1st.  
7 Q. Okay.  
8 A. And I believe that everyone in the  
9 litigation, certainly Judge Brann, anticipated  
10 that the proceedings in the district court would  
11 end before that. In fact Judge Brann issued his  
12 opinion I believe on the -- was it the 19th? No,  
13 the 21st of November, which allowed time for Third  
14 Circuit review.  
15 Q. Okay. So even if the defendants had  
16 provided notice of an intent to file a Rule 11  
17 motion on the date that the case was first filed,  
18 there would have been insufficient time, 21  
19 days -- the case was dismissed before the 21 days  
20 had run.  
21 Is that right?  
22 A. Yes.

Page 651

1 Q. Okay. Now with respect to the other  
2 option, the sua sponte option by the judge, was  
3 there a time when the judge -- judges were  
4 mandated to make -- impose Rule 11 sanctions?  
5 A. Yes. That was after the 1983  
6 amendments to Rule 11, before the 1993 amendments  
7 to Rule 11.  
8 Q. And since 1993, what has the situation  
9 been?  
10 A. The situation since 1993 is that they  
11 may, using their discretion, order Rule 11  
12 sanctions when they see a complaint that is not --  
13 or sorry, when they see a submission that was  
14 offered for an improper purpose, is not warranted  
15 by law and not warranted by the facts.  
16 Q. And has -- is there any data or studies  
17 that have been conducted about how frequently  
18 judges impose Rule 11 sanctions sua sponte?  
19 A. I'm only aware of one, which was as a  
20 result of this point, which was during this  
21 period, 1983 to 1993, when the federal courts had  
22 to actually issue sanctions when they saw a Rule

Page 652

1 11 violation.  
2 Q. And -- and there's -- there's been no  
3 information -- and do you have any information at  
4 all about how frequently judges do sua sponte?  
5 A. Well, it was a survey of five judicial  
6 districts: The District of Arizona, the district  
7 of the District of Columbia, the district of --  
8 sorry, the Northern District of Georgia, the  
9 Eastern District of Michigan, and the Western  
10 District of Texas. And the study found that in a  
11 two- to two-and-a-half year period it varied from  
12 distinct to district. There were a minimum of  
13 five and I believe maybe a maximum of 30 or 35,  
14 somewhere in there, sua sponte Rule 11 occurrences  
15 in those districts. That study is cited in a  
16 footnote in my report. I believe it's footnote  
17 114, 116, somewhere around there. If you take the  
18 total number of cases in those districts over that  
19 period of time -- I and can offer them if you  
20 want -- and then you figure out the percentage of  
21 cases in which sua sponte orders were given during  
22 that period, it comes out by my calculation as

Page 653

1 point 1.2 percent of cases.  
2 Q. All right, now I just finally want to  
3 ask you about your opinions on five matters.  
4 First, in your opinion, was there any  
5 nonfrivolous basis in law or fact for Mr.  
6 Giuliani's claim that the defendants committed  
7 election fraud?  
8 A. No.  
9 Q. Was there any nonfrivolous basis in law  
10 and fact for Mr. Giuliani's claims that the  
11 plaintiffs in this suit had standing?  
12 A. No.  
13 Q. Was there any nonfrivolous basis in law  
14 or fact where it's claimed that the Notice and  
15 Cure procedures violated the plaintiffs'  
16 constitutional rights?  
17 A. No.  
18 Q. Is there any nonfrivolous basis in law  
19 or fact that the observational boundaries violated  
20 the plaintiffs' constitutional rights?  
21 A. No, sir.  
22 Q. And finally, was there any nonfrivolous

Page 654

1 basis in law or fact for Mr. Giuliani's request  
2 for the various remedies, including declaring  
3 Trump the winner and thus the recipient of  
4 Pennsylvania's electoral vote?  
5 A. No, sir.  
6 MR. FOX: Thank you. Those are all the  
7 questions I have.  
8 CHAIRMAN BERNIUS: Mr. Kamins.  
9 MR. KAMINS: Yes, thank you, Mr. Chair.  
10 CROSS-EXAMINATION  
11 ON BEHALF OF RESPONDENT  
12 BY MR. KAMINS:  
13 Q. Professor Ortiz, can you hear me?  
14 A. I sure could, Hank.  
15 Q. Good morning or I questions I should  
16 say good afternoon where you are, right?  
17 A. Yes, sir.  
18 Q. Now in your report you stated that you  
19 published a number of articles on election law.  
20 Is that right?  
21 A. Yes, sir.  
22 Q. Many I guess -- or I should say many of

Page 655

1 them really were on campaign finance issues, were  
2 he they not?  
3 A. Yes, sir.  
4 Q. And you've litigated in, according to  
5 your report, extensively in federal courts?  
6 A. Yes, sir.  
7 Q. And you've been the attorney I noticed  
8 in a number of criminal matters, correct?  
9 A. Yes, sir.  
10 Q. And a number of civil litigation other  
11 than election cases?  
12 A. Yes, sir.  
13 Q. A number of campaign finance cases?  
14 A. Yes, sir.  
15 Q. But with respect to election disputes  
16 cases, I only notice like there were three cases I  
17 think where you were counsel for amicus curiae?  
18 A. I would have to look at my resume for  
19 that, sir, but I have no reason to -- I have no  
20 reason to contest that.  
21 Q. And I believe you filed an amicus brief  
22 for some -- some institute called the Reform

Page 656

1 Institute?  
2 A. Yes, sir.  
3 Q. And then there was one case you were  
4 one of several law professors who served as  
5 counsel for record for Individuals Who Wished to  
6 Become Delegates to the State Republican Convention  
7 to Nominate the Republican Candidate For U.S.  
8 Senate in Virginia?  
9 A. Yes, sir.  
10 Q. All right. Other than that, have you  
11 personally represented a client in a state or  
12 federal matter in which a client was a candidate  
13 in an election?  
14 A. I don't -- I can't remember, sir. I 00  
15 none comes to mind, sir.  
16 Q. All right. Have you personally  
17 represented a client in a state or federal matter  
18 in which a client was challenging another  
19 candidate in an election?  
20 A. No, sir.  
21 Q. Have you personally represented a  
22 client in a state or federal matter in which a

Page 657

1 client was challenging the results of an election?  
2 A. No, sir.  
3 Q. Have you personally represented a  
4 client in a state or federal matter in which a  
5 client was filing a petition in an election?  
6 A. No, sir.  
7 Q. And have you personally represented a  
8 client in a state or federal matter in which a  
9 client was trying to disqualify a candidate?  
10 A. No, sir.  
11 Q. Now some general questions...  
12 Would you agree then, when representing  
13 a client in a federal lawsuit, attorneys often  
14 spend weeks or even months researching the issue  
15 before drafting and then filing a complaint?  
16 A. Yes, sir.  
17 Q. And would you agree that an attorney  
18 working on an election challenge, such as the one  
19 Mr. Giuliani worked on, would have less time to  
20 prepare a complaint than in the typical federal  
21 lawsuit?  
22 A. Yes, sir.

Page 658

1 Q. And isn't it correct that in this case  
2 the original -- the first original complaint was  
3 filed only six days after the election?  
4 A. It was about that. I have no reason to  
5 contest the exact number.  
6 Q. And isn't it correct that the first  
7 amended complaint was filed only 12 days after the  
8 election on November 3rd?  
9 A. Again there was a period about that. I  
10 can't do the exact number of dates. But I have no  
11 reason to contest that.  
12 Q. And isn't it correct that Mr. Giuliani  
13 sought to file the second amended complaint only  
14 15 days after the election on November 3rd?  
15 A. Again I -- that sounds in the ballpark,  
16 but I have no idea the exact number of days. If  
17 you want, I could figure it out.  
18 Q. Well, I guess we should go to the  
19 timeline. The -- let's see, the first amended  
20 complaint was filed on November 9th, correct?  
21 A. Correct.  
22 Q. And the -- the first amended complaint

Page 659

1 was filed on -- when?  
2 A. The 15th. The 15th.  
3 Q. So that would be 12 days I believe?  
4 A. I don't remember exactly when the  
5 election was, whether it was November the 2nd or  
6 the 3rd.  
7 Q. November -- I believe the election was  
8 November 3rd.  
9 A. Okay. Then it would be six days for  
10 the initial complaint, 12 days for the first  
11 amended complaint, and 18 -- sorry. And I don't  
12 actually have the date of the second amended  
13 complaint. I believe it was the 18th. So that  
14 would make 15 days.  
15 Q. Okay. Isn't it true that Mr. Giuliani  
16 argued this motion on the same day that he was  
17 admitted pro hac vice in this matter?  
18 A. Yes, sir.  
19 Q. And would you agree that, with a much  
20 shorter window to research and prepare a  
21 complaint, there would be a greater chance that an  
22 attorney might unknowingly run afoul of the rules

Page 660

1 of pleading?  
2 A. Yes, sir.  
3 Q. And isn't it true that Judge Brann  
4 did -- did not sanction Mr. Giuliani under Rule  
5 11?  
6 A. Yes, sir.  
7 Q. And he had the authority to do so?  
8 A. Yes, sir, although --  
9 Q. Yes -- I'm sorry. Well -- no?  
10 A. I'm sorry, the standards are  
11 different --  
12 Q. I understand -- yeah, but your answer  
13 is that he did not and he had -- and that he did  
14 have the authority --  
15 MR. FOX: Can the witness complete the  
16 answer, please?  
17 MR. KAMINS: Sure, sorry.  
18 THE WITNESS: The standards are  
19 different in a case where the judge is sua  
20 sponte -- sua sponte sanctioning people under Rule  
21 11 and has not -- the twenty-one-day period --  
22 it's been -- it hasn't been 21 days and there

Page 661

1 hasn't been any time since the -- very little time  
2 since the judge would have issued a -- I believe  
3 it's a show-cause order. And in those  
4 circumstances the test is subjective bad faith,  
5 not just objective bad faith.  
6 So, under those standards, a -- it is  
7 the standard, which is common, the judge would  
8 have to actually conduct an inquiry in the  
9 attorney's state of mind and be convinced that it  
10 was not only kind of an empty-headed kind of  
11 occurrence but also that there was bad intent.  
12 Q. Understood, but notwithstanding,  
13 under -- and I appreciate your reviewing the  
14 standards, the fact is he did not sanction him,  
15 correct?  
16 A. Yes. Yes, sir.  
17 Q. And isn't it true that the Third  
18 Circuit did not sanction Mr. Giuliani under the  
19 Federal Rules of Appellate Procedure?  
20 A. Yes, sir.  
21 Q. Okay. Now I wanted to go over Judge  
22 Brann's decision. I know Mr. Fox questioned you

Page 662

1 about that.  
2 And you -- you've reviewed the  
3 decision, correct?  
4 A. Yes, sir.  
5 Q. Isn't it true that at the beginning of  
6 Judge Brann's decision he outlined the somewhat  
7 chaotic procedural history of the case?  
8 A. He -- he outlined -- he outlined the  
9 procedural history of the case for sure.  
10 Q. Right, and he noted that on November  
11 9th the complaint was filed by Mr. Hicks and  
12 Carolyn McGee, of the Porter Wright firm, and also  
13 Linda Kearns.  
14 Is that correct?  
15 A. Yes, sir.  
16 Q. And he noted that on November 12th that  
17 Mr. Hicks and Ms. McGee moved to withdraw and that  
18 the two attorneys, Mr. Scott and Hughes,  
19 substituted, thus joining Linda Kearns as  
20 cocounsel?  
21 A. Yes, sir.  
22 Q. And he noted that on November 15th the

Page 663

1 plaintiffs filed the first amended complaint by  
2 attorneys Kearns and Scott, correct?  
3 A. Correct.  
4 Q. And then he noted that on November 16th  
5 Ms. Kearns and Mr. Scott and Hughes all moved to  
6 withdraw from the litigation, correct?  
7 A. I am not -- I don't remember the exact  
8 date but he did note that they all moved to  
9 withdraw.  
10 Q. And isn't it correct that Judge Brann  
11 then granted the motion by Scott and Hughes as  
12 they only had been in the case for about 72 hours?  
13 A. Yes, sir.  
14 Q. But it's true that Judge Brann did not  
15 grant Kearns' application as she had been one of  
16 the original attorneys in the litigation and oral  
17 argument was scheduled for November 17th, correct?  
18 A. Yes, sir.  
19 Q. And isn't it true that Judge Brann kept  
20 Kearns on because he wanted to have someone to be  
21 able to answer the questions that would be posed  
22 in oral argument?

Page 664

1 A. Yes, sir.  
2 Q. And isn't it true that on November 16th  
3 Mr. Scaringi, Mark Scaringi entered a notice of  
4 appearance for the plaintiffs and requested a  
5 postponement for the previously scheduled oral  
6 argument for the 17th?  
7 A. I believe so, sir.  
8 Q. And isn't it true that the application  
9 was denied, given the emergency nature of the  
10 proceeding and the approaching deadline for the  
11 Pennsylvania counties to certify the election  
12 results on November 23rd?  
13 A. Yes, sir.  
14 Q. And isn't it true that it was not until  
15 the 17th that Mr. Giuliani made an application to  
16 appear pro hac vice and entered his notice of  
17 appearance on behalf of the plaintiffs?  
18 A. Yes, sir.  
19 Q. So would you agree, based on this  
20 procedural history, that Mr. Giuliani substituted  
21 at the -- really the last minute for the attorneys  
22 who were -- originally were handling this case?

Page 665

1 A. He certainly substituted in the  
2 proceedings before the court, meaning the oral  
3 argument, things like that. There is testimony,  
4 which is unclear, about the level of his  
5 participation in the overall lawsuit before then.  
6 Q. No, but --  
7 A. There is for example --  
8 Q. I'm sorry.  
9 A. There is for example a statement he  
10 made in a -- a deposition in a Colorado case that  
11 he actually was the one who started writing the  
12 complaint earlier.  
13 But as for his coming up and actually  
14 arguing it, certainly that was on -- it appears  
15 that that was on short notice.  
16 Q. Okay. And would you agree that there  
17 was an unusually short time within which to  
18 research, draft and file this second amended  
19 complaint?  
20 A. Certainly a quick turnover.  
21 Q. Now with respect to the oral argument  
22 before Judge Brann, Mr. Fox has asked you a number

Page 666

1 of questions. I just have a few questions.  
2 You -- you have reviewed the  
3 transcript?  
4 A. Yes, sir.  
5 Q. And didn't Judge Brann acknowledge at  
6 one point that, as of November 17th, Mr. Giuliani  
7 was just, quote, "settling into the case"?  
8 A. I believe so, sir.  
9 Q. And did he note that he was glad Ms.  
10 Kearns had remained on the case because Mr.  
11 Giuliani -- Mr Giuliani was just settling into the  
12 case?  
13 A. Yes, he did, sir.  
14 Q. Isn't it correct that nowhere in his  
15 remarks did Judge Brann state that Mr. Giuliani's  
16 remarks were frivolous?  
17 A. Yes, sir.  
18 Q. And isn't it correct that nowhere in  
19 his remarks did Judge Brann say that he was  
20 considering sanctions or referring this matter to  
21 a professional grievance committee?  
22 A. Yes, sir.

Page 667

1 Q. At some point Judge Brann invited the  
2 plaintiffs to file a second amended complaint,  
3 correct?  
4 A. I can't remember whether it was by  
5 invitation -- by invitation or whether they asked  
6 for -- they indicated that they were planning on  
7 doing so, and then he accepted that.  
8 Q. Well certainly Judge Brann didn't say,  
9 "Listen, don't bother; it's a waste of time," or  
10 something to the effect that it would be futile  
11 about filing the second amended complaint, did he?  
12 A. No, sir. I'm just -- I was just unsure  
13 about the valence or the meaning of "invited".  
14 Q. Okay. Now with respect to the second  
15 amended complaint, your report states that "Judge  
16 Brann's decision was correct in not accepting the  
17 second amended complaint for filing," correct?  
18 A. Correct.  
19 Q. And you agreed with Judge Brann's  
20 reasoning?  
21 A. Yes, sir.  
22 Q. And based on his decision, you came to

Page 668

1 the conclusion that there were no nonfrivolous  
2 bases in fact or law for Mr. Giuliani's argument?  
3 A. Yes, sir.  
4 Q. But isn't it correct that Judge Brann  
5 never held that there were no nonfrivolous bases  
6 in fact or law for Mr. Giuliani's argument,  
7 correct?  
8 A. Yes, sir. He was doing something  
9 different.  
10 Q. I'm sorry?  
11 A. That wasn't what Judge Brann's remit  
12 necessarily was. He was, you know, asked to  
13 decide the case, which he did.  
14 Q. But he made no statement about Mr.  
15 Giuliani's arguments being not frivolous, correct?  
16 A. No, no, I -- I agree.  
17 Q. And isn't it true that the fact that  
18 Judge Brann did not accept the second amended  
19 complaint for filing did not necessarily mean that  
20 the arguments in that complaint were frivolous,  
21 correct?  
22 A. Yes, sir.

Page 669

1 Q. And isn't it true that, even though  
2 Judge Brann did not accept the second amended  
3 complaint for filing, Mr. Giuliani could still  
4 have had a good-faith basis for making his  
5 arguments, correct?  
6 A. He could have.  
7 Q. Correct. And in Judge Brann's decision  
8 and his reasons for dismissal, he did not say that  
9 accepting the document for filing would -- I'm  
10 sorry, withdrawn.  
11 In Judge Brann's decision and his  
12 reasons for dismissal, did he not say that  
13 accepting the document filing would "unduly delay  
14 the resolution of the issues"?  
15 A. That was one of the reasons he gave,  
16 yes.  
17 Q. And he did not say it was frivolous,  
18 did he?  
19 A. No, sir.  
20 Q. Now Professor Ortiz, how would you  
21 define the term frivolous as it applies to  
22 pleadings or argument?

Page 670

1 A. Well, frivolous legal argument would  
2 one -- would be one where there was no  
3 justification for thinking it was supported by  
4 existing law, or good-faith argument for  
5 modification of existing law, or good-faith  
6 argument for the overturning of settled law in the  
7 other direction.  
8 Q. So basically you --  
9 A. I'm sorry.  
10 Q. No, so you're saying it's a good-faith  
11 standard?  
12 A. Yes, sir.  
13 Q. And if it's --  
14 A. But it's -- I'm sorry, it's an  
15 objective good-faith standard. It's not -- it  
16 does not go to what was in the attorney's head  
17 when he was making it.  
18 Q. So it's an objective good-faith  
19 argument -- standard?  
20 A. Yes, similar to the standard in Rule  
21 11.  
22 Q. If an attorney relies on valid

Page 671

1 precedent to make an argument but a court does not  
2 agree with that argument, would that be a  
3 frivolous argument?  
4 A. Not necessarily.  
5 Q. And if an attorney relies on valid  
6 precedent to analyze a legal issue, but a court  
7 does not agree with that analysis, would you say  
8 that's frivolous?  
9 A. Not necessarily.  
10 Q. And would you agree that if an argument  
11 is made in a complaint which turns out to be  
12 incorrect in its analysis but relies on valid  
13 precedence, that would not be a frivolous  
14 argument, correct?  
15 A. Not necessarily.  
16 Q. And would you agree that if an argument  
17 is made in a complaint which turns out to be  
18 incorrect in its analysis of the law, that the  
19 attorney could still have a good faith basis for  
20 making the argument?  
21 A. Possible.  
22 Q. And would you agree that if an attorney

Page 672

1 relies on valid precedent to make an argument but  
2 is incorrect in relying on that precedent, the  
3 attorney could still have a good-faith basis for  
4 making the argument?  
5 A. I'm sorry, could you repeat that just a  
6 little bit more slowly? I want to make sure I  
7 understand it.  
8 Q. Sorry. Would you agree that if an  
9 attorney relies on valid precedent to make an  
10 argument but is -- is incorrect in relying on that  
11 precedent, the attorney could still have a  
12 good-faith basis for making the argument?  
13 A. Possible, yes.  
14 Q. Now, Professor Ortiz, you're -- you're  
15 not giving any opinion and have not been asked to  
16 give any opinion about whether Mr. Giuliani  
17 violated any rules of professional conduct,  
18 correct?  
19 A. Correct.  
20 Q. And you're not giving any analysis of  
21 Rule 3.1 of the Rules of Professional Conduct or  
22 whether Mr. Giuliani violated that rule, correct?

Page 673

1 A. Correct. That's beyond my remit.  
2 Q. And in your report you reviewed the  
3 second amended complaint and Judge Brann's  
4 decision and concluded that you agreed with Judge  
5 Brann's decision, correct?  
6 A. Correct.  
7 Q. And then you gave your opinion based on  
8 both your view of the second amended complaint and  
9 Judge Brann's decision, correct?  
10 A. Yes, sir. Yes, sir.  
11 Q. And you essentially agree with every --  
12 with the reasoning in Judge Brann's decision?  
13 A. I don't disagree with anything in his  
14 decision. My own analysis goes further.  
15 Q. If Judge Brann was in error in  
16 interpreting a case and your report agreed with  
17 that interpretation, would you be in error, as  
18 well?  
19 A. Certainly.  
20 Q. And if Judge Brann was in error in his  
21 analysis, you would be in error, as well, correct?  
22 A. It would depend upon whether the

Page 674

1 analysis was material or not.  
2 Q. And if a case relied upon by Judge  
3 Brann was reversed after his decision, that could  
4 mean that his decision in part was in error,  
5 correct?  
6 A. It could, yes.  
7 Q. And that could also mean that you would  
8 be in error possibly as well?  
9 A. Yes, sir.  
10 Q. Okay, so I wanted to just refer to --  
11 under some specific issues in the case with regard  
12 to standing.  
13 At the conclusion of your report you  
14 stated that "The plaintiffs' lawsuit had no  
15 nonfrivolous basis in law and fact for standing,"  
16 correct?  
17 A. Yes, sir.  
18 Q. And you agreed with Judge Brann's  
19 decision which found that "Plaintiffs have not  
20 pled the cognizable theory of standing," correct?  
21 A. Yes, sir.  
22 Q. And in their arguments plaintiffs were

Page 675

1 attempting to convince Judge Brann that  
2 competitive standing has a broader meaning than  
3 the one adopted by Judge Brann, correct?  
4 A. One of the plaintiffs was.  
5 Q. And in attempting to convince him, the  
6 plaintiffs cited several Ninth Circuit cases that  
7 hold that the potential loss of an election is an  
8 injury sufficient to give a candidate standing,  
9 beyond Judge Brann's more restrictive view that  
10 standing is limited to challenging -- challenging  
11 a particular candidate's eligibility, correct?  
12 A. Correct.  
13 Q. Is it your position that that was a  
14 frivolous argument?  
15 A. I do not believe that that was brought  
16 under the category of competitive standing, which  
17 is -- I would have to go back and look at those  
18 Ninth Circuit opinions, but it is my memory,  
19 recollection that they were not brought from that  
20 particular theory of standing.  
21 Q. Well, Judge Brann --  
22 A. But I -- sorry, I would need to review

Page 676

1 those cases.  
2 Q. Judge Brann held, did he not, that  
3 under the Ninth Circuit law "competitive standing  
4 is strictly limited to the notion that a candidate  
5 or its potential party has standing to challenge  
6 the inclusion of an allegedly ineligible rival on  
7 the ballot," correct?  
8 A. Correct.  
9 Q. And do you agree with that?  
10 A. It -- it is technically construed, yes.  
11 Q. Isn't it correct, though, that the  
12 Ninth Circuit cases cited by the plaintiffs  
13 established that there are other methods through  
14 which competitive standing can occur?  
15 A. I would have to go back and reread  
16 those cases.  
17 Q. I'm referring to the Ben Kaiser case,  
18 the Fulani case, the Schultz case. Are those the  
19 ones you'd have to go back and review?  
20 A. Yes, sir.  
21 Q. And in attempting to distinguish those  
22 cases, Judge Brann cited two Ninth Circuit cases

Page 677

1 in holding that the Ninth Circuit cases had  
2 limited the concept of competitive standing, did  
3 he not?  
4 A. I believe so, sir.  
5 Q. And that would be the Townley case and  
6 the Messinas case?  
7 A. I don't remember but I have no reason  
8 to contest that.  
9 Q. Isn't it correct, however, that Townley  
10 did not conclusively state that competitive  
11 standing is limited to challenging an ineligible  
12 candidate?  
13 A. I would have to go back and review the  
14 case, sir.  
15 Q. Are you aware -- I'm sorry. Are you  
16 aware that Messinas was reversed by the Ninth  
17 Circuit this year?  
18 A. I can't -- I can't remember that. I  
19 looked at those cases in April. I certainly  
20 wouldn't have updated my analysis of those cases  
21 since then.  
22 Q. Well, under 3rd -- I'm sorry.

Page 678

1 A. Sorry, I'd have to go back and reread  
2 and review all those cases and the new one.  
3 MR. KAMINS: Well, at 34th 890 this  
4 year, the Ninth Circuit did reverse Messinas. I  
5 just want to put that on the record.  
6 BY MR. KAMINS:  
7 Q. Isn't it true that in reversing the  
8 Ninth Circuit -- well, you have -- apparently  
9 you're not familiar with the reversal, correct?  
10 A. Correct.  
11 Q. If I told you that the Ninth Circuit  
12 reaffirmed its broad concept of competitive  
13 standing and specifically rejected the narrow  
14 interpretation that Judge Brann had ascribed in  
15 its Townley decision with -- as to whether there  
16 was a nonfrivolous basis for the argument?  
17 A. I'm sorry, you froze there for about  
18 four seconds.  
19 Q. Oh. I'm sorry.  
20 If I told you that the Ninth Circuit  
21 reaffirmed -- in -- in reversing, the Ninth  
22 Circuit reaffirmed its broad concept of

Page 679

1 competitive standing and specifically rejected the  
2 narrow interpretation that Judge Brann had  
3 ascribed to Townley, would that change your  
4 opinion as to whether there was a nonfrivolous  
5 basis for the argument?  
6 A. That might change -- I'd have to read  
7 the opinion, but it might change my -- my analysis  
8 of whether there was a nonfrivolous -- a  
9 nonfrivolous basis for the competitive standing  
10 claim.  
11 Q. And if I told you that the Ninth  
12 Circuit held as follows... "Rather than narrowing  
13 competitive standing as a basis for injury, in  
14 fact Townley reasserted this court's long-held  
15 position that the potential loss of an election  
16 may give rise to standing"...  
17 Would that change your opinion?  
18 A. It would depend whether it was based on  
19 competitive standing in particular, since that was  
20 a theory that was raised, and it would also depend  
21 upon the, you know, other -- other bases, yeah,  
22 what other -- how the law stood in other circuits,

Page 680

1 as well.  
2 But it would certainly be -- it would  
3 certainly be cause for going back and looking at  
4 the support for competitive standing, that part of  
5 the -- that part of the finding.  
6 Q. And certainly, based on this reversal,  
7 it appears that there could be a good-faith basis  
8 for Mr. Giuliani's argument that this case -- that  
9 the Ninth Circuit case law should be extended to  
10 the Third Circuit, correct?  
11 A. I would have to go back and reread it,  
12 or read it.  
13 Q. Okay. Now Judge Brann noted that the  
14 plaintiffs relied on Marks v. Stinson, a Third  
15 Circuit case, to argue that the Ninth Circuit case  
16 law it cited was consistent with the law of the  
17 Third Circuit.  
18 Isn't that correct?  
19 A. I believe that he -- for standing  
20 purposes, that the date in the oral argument was  
21 whether Marks vs. Stinson concerned competitive  
22 standing, or indeed standing at all, was pointed

Page 681

1 out by at least one of the attorneys there that it  
2 never used the term "competitive standing," and  
3 that I don't remember there was really that much  
4 analysis of standing in Marks vs. Stinson.  
5 Q. Well but didn't Judge Brann in his  
6 decision say that the plaintiffs relied on Stinson  
7 to argue that the Ninth Circuit case law was  
8 consistent with the law of the Third Circuit?  
9 A. We -- I would have to go look to see  
10 what the statement was. That doesn't come to my  
11 mind. I have no reason to contest it. But it is  
12 certainly true that the plaintiffs were arguing  
13 Marks vs. Stinson as authority for standing.  
14 Q. All right. Did you discuss Marks vs.  
15 Stinson in your report in relation to standing?  
16 A. I'm sorry?  
17 Q. Did you discuss Marks vs. Stinson in  
18 your report in relation to standing?  
19 A. No, sir.  
20 Q. All right. The plaintiffs cited Marks  
21 as an example of a case involving competitive  
22 standing, did -- did they not?

Page 682

1 A. Yes, sir -- or I'm sorry, standing.  
2 Yeah, based on competitive standing in particular,  
3 correct.  
4 Q. And Judge Brown -- Brann found that  
5 Marks was inapposite because it did not contain a  
6 discussion of competitive standing or any other  
7 theory of standing applicable in federal court,  
8 did he not?  
9 A. I believe so.  
10 Q. But didn't the district court in Marks  
11 explicitly find that the candidates had standing?  
12 A. I don't remember that.  
13 MR. KAMINS: If we could go to Exhibit  
14 18, page 22 -- or Respondent's Exhibit 18.  
15 MR. LEVENTHAL: May I have a moment,  
16 your Honor, for a second to confer with my  
17 cocounsel?  
18 CHAIRMAN BERNIUS: Yeah, sure. You may  
19 want to mute your microphone.  
20 (Discussion off the record.)  
21 CHAIRMAN BERNIUS: Now you may want to  
22 unmute it.

Page 683

1 MR. LEVENTHAL: It's my fault, your  
2 Honor.  
3 BY MR. KAMINS:  
4 Q. Respondent's Exhibit 18 at page 22, the  
5 top right.  
6 MR. KAMINS: If you can make that  
7 larger.  
8 BY MR. KAMINS:  
9 Q. This is the district court's opinion.  
10 What is -- it states in Marks v. Stinson, which  
11 states "Plaintiffs have standing to bring claims  
12 regarding violations of the Civil Rights Act and  
13 the Voting Rights Act," correct?  
14 A. Correct.  
15 Q. Now, isn't it true the Third Circuit's  
16 discussion in Marks v. Stinson said nothing about  
17 standing.  
18 Is that correct?  
19 A. That is correct.  
20 Q. So would you agree that in --  
21 A. I'm sorry?  
22 Q. Would you agree that, in declining to

Page 684

1 dismiss the appeal, didn't the Third Circuit at  
2 least impliedly determine that Marks had standing?  
3 A. They -- to my mind they didn't address  
4 it, so I would not want to warrant an opinion upon  
5 what they were saying.  
6 This is -- this is something that  
7 Justice Scalia has referred to as perhaps a  
8 drive-by jurisdictional shooting when people cite  
9 cases for jurisdictional points when the court did  
10 not specifically address it.  
11 So I'm hesitant to actually offer an  
12 opinion.  
13 Q. But clearly the district court said  
14 there was standing?  
15 A. Yes, sir.  
16 Q. So, based on this, wasn't it reasonable  
17 and not frivolous for the plaintiffs to suggest  
18 that it had standing in this case?  
19 A. The plaintiffs might have argued a  
20 theory -- might have argued a valid theory of  
21 standing. They close associational standing,  
22 which the courts said did not apply, and seems

Page 685

1 to -- seems to be unwarranted for the political  
2 campaign.  
3 Q. What about the Third -- I'm sorry.  
4 A. And then they argued competitive  
5 standing, which the district court held was to --  
6 was not capacious enough to encompass the claim of  
7 the political -- the political campaign. Because,  
8 as you have said, it went to the -- the standing  
9 to challenge a candidate who was arguably not  
10 eligible to be on the ballot.  
11 Q. But in this case, based upon the  
12 discussion we just had, wouldn't -- wasn't it  
13 reasonable and nonfrivolous for the plaintiffs to  
14 suggest that they had standing?  
15 A. It's possible that they had standing,  
16 but not under the theories that they actually  
17 raised.  
18 Q. It was not frivolous, though, correct?  
19 A. Well, it is frivolous if you're  
20 claiming the basis for standing is X or Y and  
21 those basis are frivolous, even if you might have  
22 a different theory of the case that you're unaware

Page 686

1 of, which may, you know, make it possible.  
2 Q. But certainly they could have had a  
3 good-faith basis for making the argument?  
4 A. Not if the two theories that they were  
5 relying on didn't support it.  
6 Q. Let's go to voter dilution.  
7 Isn't it true that the plaintiffs in  
8 this case alleged unlawful voter dilution in the  
9 second amended complaint?  
10 A. Yes, sir.  
11 Q. And then Judge Brann then rejected the  
12 plaintiffs' argument by stating that they were  
13 barred by the Bognet decision?  
14 A. I can't remember if that was a  
15 particular basis for rejecting those complaints.  
16 The -- the Bognet -- most of the discussion for  
17 Bognet in justice -- in the litigation before the  
18 district court concerned standing for the  
19 independent state legislature or Election and  
20 Electors Clause claims.  
21 MR. KAMINS: So if we can go to  
22 Disciplinary Counsel's Exhibit 14 at -- at page

Page 687

1 19, and it's footnote 37.  
2 BY MR. KAMINS:  
3 Q. And the last sentence in that footnote  
4 says, "To the extent that plaintiffs may still  
5 argue that votes have been unconstitutionally  
6 diluted, those claims are barred by the Third  
7 Circuit's decision in Bognet," correct?  
8 A. Correct.  
9 Q. And isn't it true that the plaintiffs  
10 make clear at the outset of this case that they  
11 disagreed with Bognet and were contemplating an  
12 alternate appeal to the United States Supreme  
13 Court?  
14 A. They certainly indicated their  
15 disagreement with Bognet. I don't remember the  
16 plan to seek review in the Supreme Court.  
17 MR. KAMINS: If we could go to DC  
18 Exhibit 13, page 17.  
19 BY MR. KAMINS:  
20 Q. And the highlighted sentence says,  
21 "Plaintiffs believe Bognet was wrongly decided and  
22 maintain their Electors Clause claim to preserve

Page 688

1 it for appellate review," correct?  
2 A. Correct. Could you remind me which  
3 document this is?  
4 Q. This is in DC Exhibit 13, which is the  
5 Omnibus Reply Memorandum in Support of the Renewed  
6 Motion for TRO.  
7 A. Okay.  
8 Q. Now wasn't this argument -- essentially  
9 that a precedent should be abrogated -- wasn't  
10 that being made in bad faith?  
11 A. That's -- there's certainly no  
12 indication that was made in bad faith.  
13 Q. Well, no indication that it was in bad  
14 faith means, I take it, that it was in good faith?  
15 A. Well it depend on whether you have an  
16 objective or subjective view of good faith.  
17 I was -- I wasn't clear. If you're  
18 talking about objective good faith, you're  
19 certainly right. If you're talking about  
20 subjective good faith, which goes to what is in  
21 the thought process of the attorney, I can't make  
22 that kind of -- I can't -- you know, I can't

Page 689

1 respond because I am obviously not in a position  
2 to know what was in their heads at the time.  
3 Q. Well, certainly it's true that, because  
4 the appeals had not yet been exhausted in Bognet,  
5 that plaintiffs' argument could not be frivolous,  
6 correct?  
7 A. If they plan to over -- if they plan to  
8 seek review of Bognet in their own litigation,  
9 they were certainly keeping it open. It's not  
10 clear whether that's actually what they did before  
11 the Third Circuit. From the language of the Third  
12 Circuit opinion, it's not clear that they are  
13 preserving that stage for review.  
14 Q. But it's possible therefore that this  
15 was not frivolous?  
16 A. If they -- I mean, if they had an  
17 argument that they wanted to -- that the -- Bognet  
18 was wrong, and they actually properly -- were  
19 planning to properly reserve that, did properly  
20 reserve it for the appeal, and were planning on  
21 the possibility of seeking cert in it, that would  
22 be not in bad faith, unless, of course, the

Page 690

1 reasoning of Bognet was like so unsettled and that  
2 it was, you know, beyond reproach. And I  
3 certainly don't make that claim.  
4 Q. So it's possible?  
5 A. Yes, sir.  
6 Q. All right. Now with regard to the  
7 Equal Protection argument, you note in your report  
8 that two specific practices in the 2020 election  
9 process were challenged as a violation of the  
10 federal constitution. That would be the Notice  
11 and Cure procedures and the boundary requirements,  
12 correct?  
13 A. Yes, sir.  
14 Q. And with regard to the Notice and Cure  
15 procedure, is it correct that the plaintiffs were  
16 arguing that certain counties, that is the  
17 democratic counties, utilized a Notice and Cure  
18 procedure of ballots while the republican counties  
19 did not do so and that this unequal treatment of  
20 voters violated the Constitution?  
21 A. I don't believe that was quite it.  
22 They said that the seven counties -- I

Page 691

1 don't know that there was an overarching claim  
2 going to all republican- and democratic-controlled  
3 counties in the state, but the seven counties that  
4 were defendants were engaging in Notice and Cure  
5 in order to help candidate Biden.  
6 Q. But it was a disparate treatment of  
7 counties, essentially, correct?  
8 A. Well, it was that different counties  
9 were doing different things.  
10 Q. Correct, correct. And in making this  
11 argument, the plaintiffs relied on a number of  
12 cases, one of which was Pierce vs. Allegheny  
13 County, correct?  
14 A. I can't -- I just don't remember that.  
15 Q. All right --  
16 A. That particular case.  
17 MR. KAMINS: All right. If we can go  
18 to DC Exhibit 9 at page 100, paragraph 235. Oh,  
19 101 I guess. Can you make that a little larger.  
20 BY MR. KAMINS:  
21 Q. And paragraph 235 states, "Allowing a  
22 patchwork of different rules from county to county

Page 692

1 and as between similarly-situated absentee and  
2 mail-in ballots -- mail-in voters in a statewide  
3 election involving federal and state candidates  
4 implicates Equal Protection concerns," citing  
5 Pierce.  
6 Is that correct?  
7 A. That's correct.  
8 Q. And in Pierce -- well, you -- are you  
9 familiar with the Pierce case?  
10 A. I read it. I honestly don't remember  
11 it in any detail.  
12 Q. If I -- in Pierce the district court  
13 found that "Different counties across the state  
14 employed different standards to determine whether  
15 an absentee ballot should be counted and  
16 considered".  
17 Now in relying on that decision, is it  
18 your position that the plaintiffs were raising a  
19 frivolous argument as to equal protection?  
20 A. Well, it depends upon the basis of the  
21 decision and the reasoning of. If for example it  
22 were a kind of Bush vs. Gore reasoning, then that

Page 693

1 wouldn't be supported. There might be other  
2 possible reasonings for it. I honestly don't  
3 remember what the reasoning of the court was,  
4 which might make it nonfrivolous. But I would  
5 have to review the -- the reasoning of the case.  
6 Q. Well, in Bush v. Gore didn't -- the  
7 Supreme Court held that the implementation of  
8 different standards through a statewide recount  
9 procedure was not conducted in compliance with  
10 Equal -- Equal Protection and Due Process,  
11 correct?  
12 A. Correct.  
13 Q. And so, is it your position that by  
14 relying on -- which the plaintiffs did in Bush v.  
15 Gore, that the plaintiffs' argument was frivolous?  
16 A. Yes.  
17 Q. Well in -- in raising the Equal  
18 Protection argument, the plaintiffs also relied on  
19 an interpretation of language found in  
20 Pennsylvania Democratic Party vs. Boockvar, which  
21 is at DC17.  
22 MR. KAMINS: Could we have that -- put

Page 694

1 up pages 20 to 21.  
2 BY MR. KAMINS:  
3 Q. And this states -- and this, again,  
4 this is from the Boockvar case -- "To the extent  
5 that a voter is at risk for having his or her  
6 ballot rejected due to minor errors made in  
7 contravention of those requirements, we agree that  
8 the decision to provide a Notice and Opportunity  
9 to Cure procedure to alleviate that risk is one  
10 best suited for the legislature".  
11 Is that correct?  
12 A. That's correct.  
13 Q. And so the plaintiffs made the argument  
14 that this case holds that only the legislature and  
15 not the executive branch can implement a Notice  
16 and Cure procedure, correct?  
17 A. Correct.  
18 Q. And isn't it correct, however, that  
19 Judge Brann interpreted this opinion differently,  
20 that is that the Notice and Cure procedure is at  
21 the discretion of each county board of election,  
22 correct?

Page 695

1 A. I'm sorry, I may have misunderstood  
2 your prior question. Could you please repeat it.  
3 Q. The prior question about the language?  
4 A. Yes.  
5 Q. The plaintiffs made the argument that  
6 the case holds that only the legislature and not  
7 the executive branch can implement a Notice and  
8 Cure procedure," correct?  
9 A. Can "require" a Notice and Cure  
10 procedure.  
11 Q. Yeah.  
12 A. I did mishear you.  
13 Q. Right. But Judge Brann did -- Judge  
14 Brann disagreed, interpreted -- and interpreted  
15 this opinion differently, saying that it had -- it  
16 could be done at the discretion of each county  
17 board of elections, correct?  
18 A. No. The -- the court -- Pennsylvania  
19 Supreme Court opinion held that executive officer,  
20 the Secretary of State, could not require it, and  
21 it was not required by the Pennsylvania election  
22 statute.

Page 696

1 The Pennsylvania Supreme Court did not  
2 say that individual counties could not decide on  
3 their own.  
4 Q. But my point --  
5 A. That was something not before the  
6 court.  
7 Q. Right, but my point is Judge Brann  
8 interpreted this language differently than the  
9 argument made by the plaintiffs, correct?  
10 A. I don't believe so.  
11 Q. Well, didn't -- aren't the -- weren't  
12 the plaintiffs arguing it was the legislature only  
13 that could implement --  
14 A. Oh, oh, sorry. I'm sorry. The --  
15 Judge Brann certainly did interpret it differently  
16 than the plaintiffs interpreted it.  
17 Q. Yes, right.  
18 A. If that's the question. I'm sorry, I  
19 misunderstood.  
20 Q. Right. And they disagreed on the  
21 interpretation, though, of this language, correct?  
22 A. Correct.

Page 697

1 Q. And it's your position, though, that,  
2 in making this argument, which happens to disagree  
3 with a federal court judge, that that is a  
4 frivolous argument?  
5 A. The statute doesn't say that. The  
6 Supreme Court of Pennsylvania didn't say that.  
7 The subsequent state court decided that it didn't  
8 say that. And that opinion was affirmed by the  
9 Pennsylvania Supreme Court just I believe two  
10 months ago.  
11 Q. So when an -- when an attorney an  
12 argument, interpreting language in a decision,  
13 which the court disagrees with, you're saying that  
14 that is a frivolous argument?  
15 A. No, not necessarily --  
16 Q. All right.  
17 A. But in this case -- no, sorry.  
18 Q. So -- so it's possible that you were  
19 wrong about whether this was a frivolous argument?  
20 A. No. What I said is this is not  
21 necessarily a frivolous argument.  
22 Q. Right --

Page 698

1 A. In this case the -- you know, the state  
2 statute doesn't say that. The Pennsylvania  
3 Supreme Court didn't say that. The Secretary of  
4 State didn't take that position. Subsequent for  
5 Pennsylvania state courts have rejected the  
6 position.  
7 Q. But clearly it -- withdrawn.  
8 Isn't it correct, though, that the fact  
9 that Judge Brann found no Equal Protection  
10 violation does not necessarily mean that Mr.  
11 Giuliani did not have a good-faith basis for  
12 making this argument, correct?  
13 A. No, sir.  
14 Q. And if the interpretation of -- of this  
15 case or the language in this case is that  
16 individual counties may but need not allow Notice  
17 and Cure, then isn't it true that the state has  
18 failed to provide meaningful procedural guidance  
19 to ensure that counties do not impose nonuniform  
20 procedures?  
21 A. The state legislature may have -- you  
22 know, may want to provide more. There's no

Page 699

1 constitutional necessity for it, certainly under  
2 Bush vs. Gore.  
3 Q. Well wouldn't that interpretation run  
4 afoul of the language that you were asked about  
5 yesterday in Bush v. Gore?  
6 A. No, sir.  
7 Q. Well couldn't it be a reasonable  
8 interpretation that differs with your  
9 interpretation?  
10 A. No, sir.  
11 Q. There is no interpretation that could  
12 be reasonable that -- that runs afoul of your  
13 interpretation?  
14 A. No, certainly, sir, but not in -- not  
15 in particular on this. I'm -- certainly I'm not  
16 claiming to be infallible. That would be  
17 ridiculous.  
18 Q. Now with regard to the Due Process  
19 argument, your -- your report also addresses Mr.  
20 Giuliani's argument regarding the boundary  
21 requirements set for candidates and party  
22 representatives observing canvassing and

Page 700	Page 702
<p>1 pre-canvassing, correct? 2 A. Correct, sir. 3 Q. And you note in your report that the 4 district court did not address this issue since it 5 wasn't presented in the first amended complaint, 6 which was the subject of the motion to dismiss, 7 correct? 8 A. The -- the district court did not 9 address it as a Due Process claim. The -- the 10 district court addressed the -- the positional 11 requirements in other ways. 12 Q. But clearly there is nothing that Judge 13 Brann said about Mr. Giuliani's argument, and more 14 specifically he did thought find the Due Process 15 argument to be a frivolous argument, correct? 16 A. Correct. That was not -- the Due 17 Process positional boundaries argument was not 18 before Judge Brann. 19 Q. And you also included a paragraph in 20 your report from the Third Circuit's decision, and 21 you commented on this morning, in which the court 22 held that nothing in the Due Process Clause</p>	<p>1 presidential election was made before a -- the 2 federal -- a federal court. It was made 3 elsewhere, maybe in Pennsylvania, but this was the 4 first general occasion for it. I'm unaware of 5 others in other states and other presidential 6 elections. 7 Q. Isn't it true that many civil liberties 8 cases have been won where counsel argues a novel 9 theory which has no precedent? 10 A. This is -- there is -- there may be no 11 direct president, but there are usually resources 12 within the legal territory, particularly other 13 precedents that are related, on which people, 14 lawyers rely. 15 And in this case -- in this -- this 16 case, with respect to the positional boundaries, 17 the -- what you might call the collateral 18 landscape and the Due Process doctrine, in my 19 view, was so well settled that this was just a 20 frivolous claim. 21 Q. Well wouldn't effective advocacy be 22 chilled if attorneys could not attempt to extend</p>
Page 701	Page 703
<p>1 mandates these observational boundaries, correct? 2 A. Correct. 3 Q. And in addition, you mentioned that the 4 court noted that the campaign cites no 5 authority -- I'm talking about the Third Circuit. 6 The Third Circuit said, "The campaign cites no 7 authority for those propositions and we know of 8 none," correct? 9 A. I believe that's right, sir. 10 Q. And that in your report you said that 11 this is a "devastating comment" by the Third 12 Circuit, correct? 13 A. I believe so, sir. 14 Q. Well, isn't it possible that there was 15 no precedent for arguing a Due Process violation 16 here because this was an unprecedented 17 presidential election and counsel was arguing that 18 for the first time, Due Process -- a Due Process 19 Clause should be applied? 20 A. It was certainly the -- I believe the 21 first time when that particular type of claim 22 going to positional boundaries and the</p>	<p>1 the application of the Due Process Clause to new 2 and unchartered areas? 3 A. If there's good faith. If there's an 4 analogous, you know -- if there's an analogy 5 there, for sure. 6 If this kind of claim, though, has been 7 rejected regularly in other contexts where courts 8 have not said the Due Process actually regulates 9 things, or even in the neighborhood of this, then 10 no. 11 Q. Well, is there precedent to say that 12 this has been rejected in this type of situation? 13 A. With positional boundaries? I don't 14 believe so, except maybe earlier in one of the 15 collateral Pennsylvania cases. 16 I'm unaware of any successful Due 17 Process claim challenging the nuts and bolts of 18 garden-variety election administration. 19 Q. But an unsuccessful claim could still 20 be a valid good-faith argument, could it not? 21 A. For sure. It just depends upon how 22 well settled the law was against it.</p>

Page 704

1 Q. Well clearly there was no -- this is  
2 not an area where there's settled law?  
3 A. Oh, I believe there is settled law in  
4 this area, just not on positional boundary  
5 requirements in particular, but in other --  
6 Q. Right.  
7 A. -- kinds of things.  
8 Q. Exactly. That -- that's the point.  
9 With regard to this issue as to  
10 settled -- as to observational boundaries and  
11 the -- and the application of Due Process, this is  
12 not settled law.  
13 A. Well, it is settled law if you look at  
14 where -- there may have been no cases of this in  
15 particular, the positional boundaries, since this  
16 was a novel -- and in particular, you know, that  
17 specific question was a novel one. But when you  
18 look at the court's rejection of Due Process  
19 constraints on related kinds of administration --  
20 election administration activities, it's very hard  
21 to argue that there were well -- there were  
22 resources available to make a good-faith argument.

Page 705

1 Q. But you agree --  
2 A. In my view.  
3 Q. But you agree this was a novel  
4 argument?  
5 A. With respect to positional boundaries  
6 in particular, yes. There were not -- there  
7 wasn't like a line of precedent holding this way  
8 in the past.  
9 Q. Thank you.  
10 Now, are you familiar with a provision  
11 in the United States Code that provides district  
12 courts, federal district courts with supplemental  
13 jurisdiction over claims that do not have  
14 independent federal subject matter jurisdiction?  
15 A. I believe the primary one is 28 U.S.C.  
16 1367.  
17 Q. Correct. And this allows federal  
18 courts to hear additional claims which are  
19 substantially related to the original claim in a  
20 lawsuit, correct?  
21 A. Yes.  
22 Q. And this permits a federal court

Page 706

1 hearing a federal claim to also hear substantially  
2 related state law claims, correct?  
3 A. Yes, sir.  
4 Q. So assuming that Mr. Giuliani had a  
5 reasonable basis to raise the Equal Protection  
6 and/or the Due Process claim, isn't it true that  
7 Judge Brann would have then had supplemental  
8 jurisdiction to review the plaintiffs' state law  
9 claim, namely that the opening and counting of  
10 ballots were conducted without observation, in  
11 violation of a state statute?  
12 A. He could have. He didn't -- he  
13 wouldn't necessarily have had to.  
14 Q. But he could have?  
15 A. Well, it - yes.  
16 Q. Okay. Now you stated in your report  
17 that this was no basis in fact or law a number --  
18 for a number of the remedies that Mr. Giuliani  
19 requested in the second amended complaint,  
20 correct?  
21 A. Yes, sir.  
22 Q. And Mr. Giuliani asked for the

Page 707

1 following as part of his relieve, or the  
2 plaintiffs' relief, quote, "Any and other such  
3 further relief sought that this court deemed  
4 equitable and just or to which plaintiffs might be  
5 entitled," correct?  
6 A. Yes, sir.  
7 Q. And you -- isn't it true that you  
8 acknowledge in your report that this form of  
9 relief was legally permissible and not frivolous,  
10 correct?  
11 A. That kind of request for relief -- it  
12 was unclear what the relief would be, but that  
13 kind of request for relief is certainly  
14 permissible.  
15 Q. And not frivolous, correct?  
16 A. Correct.  
17 Q. Okay.  
18 MR. KAMINS: I have no further  
19 questions.  
20 CHAIRMAN BERNIUS: Mr. Fox?  
21 MR. FOX: I just have two areas.  
22 REDIRECT EXAMINATION

Page 708

1 ON BEHALF OF DISCIPLINARY COUNSEL  
2 BY MR. FOX:  
3 Q. Mr. Kamins asked you whether you were  
4 giving an opinion as to whether the conduct in  
5 this case violated the Rules of Professional  
6 Conduct. You said you were not.  
7 It is you true, is it not, that I  
8 specifically asked you not to give such an opinion  
9 because there is an ultimate issue for this  
10 hearing committee?  
11 A. Yes, sir.  
12 Q. Okay. And second, Mr. Brann asked you  
13 questions about whether -- sorry.  
14 Mr. Kamins asked you questions about  
15 whether Judge Brann had made a statement that the  
16 pleadings were frivolous, and you said they did  
17 not.  
18 Had that issue been raised to him  
19 before then?  
20 A. No, sir.  
21 Q. And did he comment on the strength of  
22 the arguments and facts that Mr. Giuliani and his

Page 709

1 colleagues brought before him?  
2 A. Yes, sir.  
3 Q. Would you look, please, at Disciplinary  
4 Counsel Exhibit 14, which is Judge Brann's  
5 opinion, and I would like to refer you to the  
6 introduction on page eight.  
7 MR. FOX: If we could highlight the  
8 introduction in those paragraphs.  
9 BY MR. FOX;  
10 Q. Is this the portion of the opinion on  
11 which Judge Brann commented on the strength of the  
12 legal arguments and the facts brought forth by Mr.  
13 Giuliani and his colleagues?  
14 A. That is one of the places, certainly.  
15 Q. All right. And -- okay --  
16 A. I'm sorry, Mr. Fox. You froze. You  
17 must have froze there, or were you silent for --  
18 Q. Believe it or not, I was silent. I  
19 know it's --  
20 A. Oh, okay.  
21 Q. It's hard to imagine, but -- but I was  
22 silent.

Page 710

1 I was going to ask you whether -- I was  
2 going to decide whether to have you read this or  
3 not, but I don't think it's necessary. I think  
4 it's in front of the hearing committee at this  
5 point, and we read it to them in -- in our opening  
6 statement.  
7 So with that, I'm not going to ask you  
8 any further questions.  
9 CHAIRMAN BERNIUS: Mr. Kamins, anything  
10 else?  
11 MR. KAMINS: Nothing further, your  
12 Honor -- Mr. -- Mr. Chair.  
13 CHAIRMAN BERNIUS: Professor Ortiz, I  
14 do have -- I do have a couple of questions.  
15 You -- you said I think at the  
16 beginning of your testimony that "Equal Protection  
17 in elections presents many complexities".  
18 Do you remember that testimony?  
19 THE WITNESS: I believe I was reading  
20 from the opinion in Bush vs. Gore where the  
21 Supreme Court was cautioning -- the way it is  
22 academically interpreted, at least, and I believe

Page 711

1 so on the ground, the Supreme Court was guiding  
2 the lower courts and litigators not to take the  
3 reasoning of Bush vs. Gore too strongly because of  
4 the specific facts of Bush vs. Gore, meaning that  
5 we were in December, there was chaos on the ground  
6 in Florida, and there was need for the country to  
7 settle the presidential election.  
8 But that I believe -- the part -- the  
9 reading -- that was reading you were referring to,  
10 not my own.  
11 CHAIRMAN BERNIUS: Okay.  
12 THE WITNESS: Yeah.  
13 CHAIRMAN BERNIUS: Would you -- would  
14 you agree, though, that there are -- that Equal  
15 Protection in elections is a -- is a complex  
16 issue?  
17 THE WITNESS: Yes, sir.  
18 CHAIRMAN BERNIUS: How so?  
19 THE WITNESS: How so? Well there are  
20 many different kinds of ways that it's going to  
21 come up, many ways that people can argue that  
22 there's going to be discrimination.

Page 712

1           The standard that the court applies in  
2 most election administration cases, for example,  
3 the Anderson verdict standard involves a kind of  
4 balancing test where you have to take the -- the  
5 weight of the injury to the particular plaintiff  
6 and weight that against the -- the state's  
7 interest. That's always going to be a kind of  
8 complicated undertaking.  
9           Those are just some examples.  
10          CHAIRMAN BERNIUS: Now the Bush against  
11 Gore decision, as is -- to my recollection was  
12 surprising, wasn't it?  
13          THE WITNESS: Yes, sir.  
14          CHAIRMAN BERNIUS: And --  
15          THE WITNESS: To many of us.  
16          CHAIRMAN BERNIUS: Yes. And it's  
17 been -- it's been highly criticized?  
18          THE WITNESS: Yes, sir.  
19          CHAIRMAN BERNIUS: But it essentially  
20 deals with the concept of disparate treatment  
21 among state municipalities, right, broadly  
22 speaking?

Page 713

1           THE WITNESS: It -- very broadly  
2 speaking, but with one very important caveat: it  
3 involves a situation where there is one state  
4 actor who is in a position at that moment in time  
5 to actually assure some higher degree of  
6 uniformity than is -- than, you know, was  
7 otherwise possible.  
8           So for example --  
9          CHAIRMAN BERNIUS: I'm sorry. Go  
10 ahead. I'm sorry.  
11          THE WITNESS: So, for example, again,  
12 the question in Bush vs. Gore was that Florida's  
13 long-standing standard for whether a vote should  
14 count or not was whether the quote, unquote intent  
15 of the voter was discernable. And that's a -- you  
16 know, a perfect standard. It's a little bit vague  
17 in people --  
18          (Network interference.)  
19          MR. FOX: I think he froze.  
20          CHAIRMAN BERNIUS: Yes.  
21          MR. FOX: Dan, I don't know if you can  
22 hear us or not, but you froze --

Page 714

1           THE WITNESS: (Continuing answer) all  
2 that has to be covered --  
3          CHAIRMAN BERNIUS: Well, it's -- it's  
4 10:22. I was anticipating breaking at --  
5          Are you back, professor.  
6          THE WITNESS: I am back. I'm sorry. I  
7 have no idea what happened.  
8          CHAIRMAN BERNIUS: Okay.  
9          MR. FOX: Oh, there he is, yeah.  
10          CHAIRMAN BERNIUS: Yeah, I'm not sure  
11 what my question was, and I'm not sure what your  
12 answer might have been, so let me -- let me try  
13 and recreate.  
14          What I'd like to do -- I mean,  
15 you're -- you -- you're a -- you're a law  
16 professor, and it seems to me that much of your  
17 testimony has been with your law professor hat on  
18 and a scholarly analysis of the cases and the --  
19 and the issues.  
20          But I'd like to -- I'd like you to take  
21 your professorial hat off and put your litigator  
22 and technical hat on, if you would, okay?

Page 715

1           THE WITNESS: Okay.  
2          CHAIRMAN BERNIUS: And let's --  
3 let's -- let's assume -- and I think it's  
4 supported in the testimony -- that you're --  
5 you're called by the president of the United  
6 States, and he says, "I want you to represent me  
7 in connection with challenging what happened in  
8 this election".  
9          What's your -- and -- and -- and  
10 your -- your view is -- is much different, isn't  
11 it, than someone who's analyzing case law from an  
12 objective and -- and law school perspective?  
13          THE WITNESS: For sure, but you're  
14 still --  
15          CHAIRMAN BERNIUS: I'm sorry, go ahead.  
16          THE WITNESS: But, you know, some of  
17 the constraints would still apply, and the  
18 question is where those constraints are.  
19          I -- you know, for example, if I had  
20 been in the position that you described, I would  
21 have drafted a very different kind of lawsuit than  
22 this. So --

Page 716

1 CHAIRMAN BERNIUS: And -- and you're --  
2 you're an expert in election law, so no doubt  
3 your -- your approach would have been somewhat  
4 different, at least from what was done here.  
5 But if your -- your ultimate objective  
6 is to get this case and others before the Supreme  
7 Court, that's really what you're doing in this  
8 case, isn't it?  
9 THE WITNESS: If that were my  
10 objective, and I assume that that would be my  
11 hope, if I were in that position, I would have  
12 done things differently than here.  
13 CHAIRMAN BERNIUS: But --  
14 MR. KAMINS: Mr. Chair, could I just  
15 interject. I don't want to object to the Chair's  
16 questions, except that, if he's giving his opinion  
17 as to his strategy on how he would handle a  
18 particular case, I'm not sure that that impacts on  
19 whether the plaintiffs here were frivolous or not.  
20 I mean, he's just giving his opinion  
21 about what he would do as a federal litigator.  
22 And, you know, obviously we -- and as you know,

Page 717

1 Mr. Chair, you know, litigators have different  
2 views on how to strategize cases and what they  
3 would put -- and how they would draft complaints,  
4 but that doesn't impact negatively on -- on Mr.  
5 Giuliani, or shouldn't.  
6 CHAIRMAN BERNIUS: Let me -- let me --  
7 let me finish my line of questions here.  
8 I mean, it's -- it's not unreasonable  
9 to think that this -- this litigation campaign,  
10 one way or the other, would wind up in front of  
11 the Supreme Court.  
12 THE WITNESS: Correct.  
13 CHAIRMAN BERNIUS: And -- and -- if --  
14 wouldn't you -- wasn't it appropriate for the  
15 plaintiffs to -- for -- for -- to assess Bush v.  
16 Gore and say, well, you know, it happened -- "It  
17 worked for the bush campaign. Let's try -- let's  
18 try and make some of these arguments to support  
19 the Trump campaign".  
20 THE WITNESS: Well the facts, your  
21 Honor, of Bush vs. Gore were so different in the  
22 specific way the Supreme Court tried to limit it,

Page 718

1 that there -- there's lack of success of, you  
2 know, Bush vs. Gore claims in the lower court,  
3 since that period of time. There is no -- to my  
4 knowledge, there has been no case where a court  
5 has actually overturned an election under Bush vs.  
6 Gore under circumstances where certainly there was  
7 no central actor who, at that time, could have  
8 assured uniformity.  
9 CHAIRMAN BERNIUS: I guess -- here's  
10 where I'm going. I represent a client --  
11 represented a client who just appointed three  
12 justices to the United States Supreme Court, and I  
13 want to get my case in front of the Supreme Court  
14 to -- to test that and see if they will expand the  
15 concepts that were articulated in Bush against  
16 Gore...  
17 Doesn't that -- doesn't that suggest  
18 that I'm going to be more expansive in the types  
19 of claims I'm going to make under the Equal  
20 Protection Clause?  
21 THE WITNESS: Oh, for sure. You're  
22 going to be presumably very creative, you're going

Page 719

1 to try to do the best for your client, but the  
2 question is how creative and well warranted can  
3 the arguments be?  
4 So, you may come up with a very  
5 creative argument but, for example, if it's not  
6 well warranted under existing precedent --  
7 precedent, it still would be, you know,  
8 insufficient.  
9 So, yes, I mean, that would be your  
10 job, but you're still -- the question is still  
11 whether, in doing your best, you may be doing a  
12 wonderful job in coming up with the best argument,  
13 you get over that threshold.  
14 MR. KAMINS: Did he freeze or --  
15 CHAIRMAN BERNIUS: Yeah, I --  
16 MR. KAMINS: Oh, I'm sorry.  
17 CHAIRMAN BERNIUS: I think, you know --  
18 my concern too, here, is the -- you know, the  
19 independent legislature theory, which, two years  
20 ago -- what was -- what was the -- the accepted  
21 view of the independent legislature theory?  
22 THE WITNESS: The independent --

Page 720

1 there -- a few justices of the Supreme Court had  
2 made noises about it, but there was a case a few  
3 years ago concerning the ability of Arizona to  
4 rely on a redistricting commission in setting the  
5 boundaries for federal congressional districts in  
6 Arizona. The voters by initiative had taken it  
7 out of -- the power away from the state  
8 legislature. And the question whether -- was  
9 whether that was permissible, and the Supreme  
10 Court and opinion said that it was  
11 constitutionally permissible, and after that point  
12 people thought that there were some justices, but  
13 not a majority of justices, on the Supreme Court  
14 who would basically be -- look in favor on those  
15 kinds of arguments, but that it was foreclosed by  
16 precedent.

17 As I said, though, some versions of  
18 those arguments are up before the Supreme Court  
19 for argument today. I can't remember if they were  
20 in the -- the first argument or the second, but  
21 they may be arguing about it as we speak.

22 CHAIRMAN BERNIUS: I guess -- I guess

Page 721

1 what I'm saying, professor, is that, you know,  
2 what -- what appears to be settled law -- settled  
3 election law, Equal Protection law, settled  
4 independent state legislature principals -- are  
5 not necessarily settled if you are in unique  
6 circumstances, unprecedented circumstances and you  
7 have a new Supreme Court decision that you want to  
8 get before...

9 In your view, doesn't that give you  
10 greater leeway to be creative and to make  
11 unprecedented arguments, perhaps?

12 THE WITNESS: It may give you greater  
13 leeway to be creative. You may be able to strain  
14 for precedent more than you would in a  
15 garden-variety case. But again you're  
16 ultimately -- if the question is ultimately  
17 whether the arguments get over the frivolous  
18 threshold, and in my opinion they don't in -- you  
19 know, in this case.

20 But certainly, you know, there's --  
21 there's going to be pressure to be more creative,  
22 you would expect people to be more creative, but

Page 722

1 there still is at a bottom a kind of requirement  
2 for the arguments not just to be the best  
3 arguments but to be nonfrivolous.

4 CHAIRMAN BERNIUS: You've -- you've  
5 talked a little bit with the standing issue and I  
6 think, as I interpreted your -- your testimony,  
7 you said that the plaintiffs were correct on  
8 standing but for the wrong reason?

9 Is that -- did I misinterpret your --

10 THE WITNESS: I said it may be -- no,  
11 no, no. I said it may be that the plaintiffs were  
12 correct on standing, but not for the reasons that  
13 they argued.

14 CHAIRMAN BERNIUS: Okay. And if you  
15 are correct on standing but for different  
16 reasons -- if the results -- you're right --  
17 you're correct with respect to the result but for  
18 the wrong reasons, that's a frivolous claim?

19 THE WITNESS: Well it certainly is a  
20 frivolous claim for the reasons you were arguing  
21 it for, and the responsibility is for the people  
22 invoking the jurisdiction of the federal courts to

Page 723

1 show that they have standing. And I'm not saying  
2 that they definitely had standing. They were just  
3 arguing for the wrong reasons for it. I'm saying  
4 it's possible that, there was -- I can't -- I  
5 can't -- it wasn't within my remit to actually go  
6 through all the possible bases for standing and  
7 categorically reject every one of them.

8 My remit was to look at the arguments  
9 that were actually made and to see if they were  
10 made -- if they were frivolous or not.

11 So, it's certainly possible. I would  
12 assume that the plaintiffs made the best arguments  
13 that they thought they could. But in any case,  
14 you know, their -- it may be possible to  
15 imagine -- I'm not -- I haven't imagined one -- it  
16 may be possible to imagine a different theory of  
17 the case which would allow that. It's just not  
18 one of the ones that the plaintiffs were actually  
19 arguing.

20 But I'm not saying that such a thing  
21 exists. I'm just not ruling it out of the realm  
22 of possibility, because I go there.

Page 724

1 CHAIRMAN BERNIUS: Thank you.  
2 Mr. Brozost, anything?  
3 MR. BROZOST: Yes, Mr. Bernius. Just  
4 briefly. I have a couple of clarifying questions  
5 for Mr. Ortiz.  
6 Mr. Ortiz, I believe you testified  
7 yesterday that, as to the initial complaint, you  
8 learned in a deposition in Colorado about Mr.  
9 Giuliani's involvement.  
10 Could you expand on that a little bit?  
11 THE WITNESS: I believe that in a  
12 deposition in Colorado, a litigation before the  
13 federal court, Mr. Giuliani said that he started  
14 drafting the first amended complaint, not -- this  
15 is -- I believe -- I don't believe it was the  
16 initial complaint. I believe it was the first  
17 amended complaint, which suggested in context that  
18 he had some substantial responsibility for it.  
19 Then that became, you know, a little bit less  
20 clear from his testimony where, you know, he said  
21 that his participation amounted to maybe 10% to  
22 20% of the -- of the first amended complaint,

Page 725

1 certain numbers of paragraphs, things -- it was  
2 just unclear to me.  
3 MR. BROZOST: Yeah, and what was the  
4 context of the deposition in Colorado?  
5 THE WITNESS: It was another -- I  
6 believe it was another election lawsuit. I didn't  
7 read the full deposition. I read the -- just the  
8 sort of large excerpt and the surrounding bit  
9 concerning this statement.  
10 MR. BROZOST: Okay, thank you. One  
11 other question.  
12 I guess there was -- Mr. Giuliani did  
13 have a very compressed time to familiarize himself  
14 and present the case. But I guess that is typical  
15 of all election cases, isn't it?  
16 THE WITNESS: Yes, sir, pretty much all  
17 of them. A lot of the ones contesting counting  
18 and things like that and the administration of the  
19 canvass, for sure.  
20 But, there are some cases where, for  
21 example, in Michigan and Arizona the cases were  
22 concerning things brought very -- you know, far

Page 726

1 enough ahead, and ultimately Rule 11 sanction --  
2 there was plenty of time there. People asked for  
3 Rule 11 sanctions, for example, and after 21 days  
4 filed the motion, and in both cases I believe the  
5 Rule 11 sanctions were granted.  
6 So you can -- you can actually -- if  
7 you can see things coming, then you can actually  
8 attack them sometimes very far in advance, or, you  
9 know, months in advance. But in some cases, it  
10 may be the case that you have to wait until you  
11 actually see how things settle where there would  
12 be a very short time frame.  
13 MR. BROZOST: Thank you, Mr. Ortiz.  
14 CHAIRMAN BERNIUS: Ms.  
15 Haynesworth-Murrell?  
16 MS. HAYNESWORTH-MURRELL: I have no  
17 questions for this -- Mr. Ortiz at this time.  
18 CHAIRMAN BERNIUS: Mr. Fox, any  
19 follow-up?  
20 MR. FOX: Yeah. Could we put up  
21 Disciplinary Counsel Exhibit 34, which is the  
22 deposition that Mr. Brozost was asking about.

Page 727

1 REDIRECT EXAMINATION  
2 ON BEHALF OF DISCIPLINARY COUNSEL  
3 BY MR. FOX:  
4 Q. And let me refer you to page 141 of  
5 that exhibit.  
6 MR. KAMINS: I'm sorry, Mr. Chair, is  
7 this in the nature of redirect, or what -- what is  
8 this questioning?  
9 CHAIRMAN BERNIUS: It's in the nature  
10 of redirect.  
11 MR. KAMINS: I'm sorry, I thought Mr.  
12 Fox had his opportunity to redirect.  
13 CHAIRMAN BERNIUS: Well, he's  
14 following -- he's following up on the questions  
15 that were asked by the panel.  
16 MR. KAMINS: I see.  
17 CHAIRMAN BERNIUS: I assume.  
18 MR. FOX: Yeah, if you could blow up --  
19 make it a little more visible, lines 18 through  
20 25. I just want to ascertain whether this is the  
21 portion of the -- I'm sorry, I said 18. I meant  
22 14, 14, I apologize.

Page 728

1 BY MR. FOX:  
2 Q. And I -- I just want to make sure that  
3 this was the -- verify this is the portion of the  
4 deposition that you were talking about when you  
5 were being asked by Mr. Brozost?  
6 A. Yes, sir.  
7 Q. Okay.  
8 A. Yes, sir.  
9 Q. And -- and do you recall that this is  
10 actually the initial complaint instead of the  
11 first amended complaint?  
12 A. No. I may have been confused. I  
13 assume this was the first amended complaint but  
14 I'm not certain about that.  
15 Q. All right. Thank you.  
16 MR. FOX: I have nothing further.  
17 CHAIRMAN BERNIUS: Mr. Kamins, anything  
18 else?  
19 MR. KAMINS: No, Mr. Chair.  
20 CHAIRMAN BERNIUS: Thank you, Professor  
21 Ortiz, you're -- you're excused --  
22 MR. KAMINS: Oh, I'm so sorry. I'm

Page 729

1 sorry, Mr. Chair. Mr. Leventhal had a question he  
2 wanted.  
3 CHAIRMAN BERNIUS: Well, it's unusual  
4 to have two lawyers working on one witness, but  
5 I'll let you do it.  
6 MR. KAMINS: Thank you.  
7 MR. LEVENTHAL: Well, not, it's just --  
8 RECROSS-EXAMINATION  
9 ON BEHALF OF RESPONDENT  
10 BY MR. LEVENTHAL  
11 Q. Mr. Ortiz, are you aware that the  
12 Supreme Court themselves have on occasion reversed  
13 themselves within two years, they changed  
14 precedent within two years?  
15 A. I can't think of a specific example,  
16 but --  
17 Q. I'll give you one --  
18 A. -- but it wouldn't be surprised.  
19 Q. I'll give you one. Brady vs. Corbin,  
20 when double jeopardy, they used the same conduct  
21 test and they changed it to the same elements test  
22 two years later.

Page 730

1 Does that refresh your memory?  
2 A. I don't do very much criminal  
3 procedure, so I'm unfamiliar with that --  
4 Q. But you do -- you do --  
5 A. -- pair of cases.  
6 Q. Okay. And -- and in Crawford v.  
7 Washington, in 1980, they overruled Ohio vs.  
8 Roberts and they did away with reliability on --  
9 on hearsay and they -- and Justice Scalia  
10 convinced all of his nine colleagues to overrule  
11 Ohio vs. Roberts, all with saying that, "The only  
12 way we could test cross-examination is not by  
13 hearsay reliability, but by the crucible of  
14 cross-examination".  
15 Do you recall that?  
16 A. Yes, I do, sir. I don't require (sic)  
17 the dates but I do require -- I do remember the  
18 overruling.  
19 Q. So the Supreme Court basically reversed  
20 its precedent, recent precedent, correct?  
21 A. Yes -- no -- it doesn't happen often,  
22 but it does.

Page 731

1 MR. LEVENTHAL: All right, thank you.  
2 CHAIRMAN BERNIUS: Mr. Fox, I assume  
3 you have nothing else?  
4 MR. FOX: I have nothing else.  
5 CHAIRMAN BERNIUS: Thank you, Professor  
6 Ortiz.  
7 (Witness is excused.)  
8 CHAIRMAN BERNIUS: We will take our  
9 morning break and resume at five minutes to 11:00.  
10 MR. FOX: And just for the record,  
11 that's all the evidence I have, so we will be in  
12 the respondent's case at that point.  
13 CHAIRMAN BERNIUS: All right.  
14 MR. KAMINS: In fact, Mr. Chair, if I  
15 could just ask Ms. Borazzas --  
16 MR. ESPOSITO: He's in the waiting  
17 room.  
18 MR. KAMINS: -- if Mr. Lewandowski is  
19 in the waiting room.  
20 MS. BORAZZAS: Someone with the name NH  
21 Add, a-d-d --  
22 MR. KAMINS: Yeah. I think that's --

Page 732

1 MS. BORAZZAS: I assume that's him.  
2 MR. KAMINS: Yes, thank you. Okay, so  
3 we will be ready when we come back to go forward  
4 with Mr. Lewandowski.  
5 MR. LEVENTHAL: Are they all in the  
6 waiting room, Ms. Borazzas?  
7 MS. BORAZZAS: That's the only person  
8 in the waiting room now.  
9 CHAIRMAN BERNIUS: All right. Thank  
10 you. 10:55.  
11 MR. BORAZZAS: All right, opening up  
12 the breakout rooms now.  
13 (Recess taken.)  
14 CHAIRMAN BERNIUS: All right, Mr.  
15 Kamins, you want to call your first witness,  
16 please.  
17 MR. KAMINS: Yes. Would you please let  
18 in Mr. Lewandowski.  
19 MS. BORAZZAS: All right, I am letting  
20 in HN Add. I believe it's him.  
21 MR. KAMINS: Thank you.  
22 MS. BORAZZAS: You're welcome.

Page 733

1 (Corey Lewandowski on the witness  
2 stand.)  
3 CHAIRMAN BERNIUS: Mr. Lewandowski, do  
4 you solemnly swear or affirm that the testimony  
5 you will give in this proceeding will be the  
6 truth, the whole truth and nothing but the truth,  
7 so help you god?  
8 THE WITNESS: I do.  
9 CHAIRMAN BERNIUS: You may proceed, Mr.  
10 Kamins.  
11 MR. KAMINS: Thank you, Mr. Chair.  
12 Whereupon,  
13 COREY LEWANDOWSKI,  
14 called as a witness on behalf of the Respondent,  
15 and after having been first duly sworn, was  
16 examined and testified as follows:  
17 DIRECT EXAMINATION  
18 ON BEHALF OF RESPONDENT  
19 BY MR. KAMINS:  
20 Q. Good morning, Mr. Lewandowski.  
21 A. Good morning.  
22 Q. Are you currently employed?

Page 734

1 A. I am a consultant.  
2 Q. And what is your -- do you have any  
3 titles or what -- with whom are you affiliated?  
4 A. I have no affiliation. I do political  
5 consulting work and consulting for some private  
6 sector companies.  
7 Q. Are you affiliated at all with  
8 Strategic Advisors?  
9 A. Lewandowski Strategic Advisors is the  
10 name of my company.  
11 Q. Okay, could you -- and what is your  
12 position there?  
13 A. I'm the CEO and president of the  
14 company.  
15 Q. And what does Strategic Advisors do?  
16 A. We give counsel to Fortune 100s as well  
17 as political candidates on messaging and execution  
18 of political campaigns.  
19 Q. And did you hold any former positions  
20 prior to this?  
21 A. I served in 2015 and 2016 as then  
22 candidate Donald Trump's campaign manager. I

Page 735

1 severed as the national director of voter  
2 registration for Americans From Prosperity. I  
3 served as a police officer in the state of New  
4 Hampshire. And then, going back to many, many,  
5 many years and many other jobs. I could go  
6 through a litany of those, but those would be the  
7 jobs I had for the last ten years.  
8 Q. That's quite all right. I just wanted  
9 to get your more recent positions.  
10 Do you -- do you hold any degrees?  
11 A. I have a Master's degree in American  
12 political science from American University; I  
13 attended the Naval War College, and I have an  
14 undergraduate degree from the University of  
15 Massachusetts.  
16 Q. Thank you. Now after the presidential  
17 election on November 3rd, 2020, what if any  
18 connection did you have to the election process in  
19 Pennsylvania?  
20 A. Immediately following the results for  
21 the -- the election on the 3rd, I received a phone  
22 call from Eric Trump. I was in my apartment in

Page 736

1 Washington, DC. He asked me if I could make my  
2 way Philadelphia to help oversee the continuation  
3 of the counting, which was transpiring at that  
4 time.  
5 I get in my vehicle --  
6 Q. All right, let me -- let me just  
7 interrupt.  
8 Did you go to Philadelphia?  
9 A. I did, yes.  
10 Q. When was that?  
11 A. That next morning. So that would have  
12 been on Wednesday morning. I met with --  
13 Q. I'm sorry, let me -- let me just -- if  
14 I could just sort of guide you a little bit.  
15 And this was November 4th?  
16 A. Yes, it was.  
17 Q. All right. And who did you meet with  
18 when you arrived there in Philadelphia?  
19 A. I -- upon arriving in Philadelphia, I  
20 went to what was the campaign headquarters and met  
21 originally with the person who was running the  
22 campaign team there.

Page 737

1 Q. And who was that?  
2 A. I believe his name was Mike Roman.  
3 Q. And did you meet anyone else there  
4 besides Mr. Roman?  
5 A. Yes. I asked to meet with the entire  
6 legal team representing the Trump campaign and I  
7 met with a woman who arrived and told me that she  
8 was the individual on retainer from the Trump  
9 campaign to represent them in the City of  
10 Philadelphia.  
11 Q. And what was her name?  
12 A. I don't remember her name specifically,  
13 but she was a larger, heavyset woman who I  
14 believe -- you know, she gave me her name. I just  
15 don't recall off the top of my head.  
16 Q. Would it refresh your memory if I -- if  
17 I mentioned the name Linda Kearns?  
18 A. That is her 100%, yes.  
19 Q. Okay. Did you meet a woman by the name  
20 of Pam Bondi?  
21 A. Yes, I did.  
22 Q. And who is she?

Page 738

1 A. Pam Bondi is the former Attorney  
2 General for the State of Florida, and she and I  
3 actually traveled from Philadelphia together from  
4 Washington, DC on that Wednesday morning.  
5 Q. Okay. Now at some point did you go to  
6 the convention center in Philadelphia?  
7 A. I did.  
8 Q. And when was that?  
9 A. Shortly after arrival at the campaign  
10 office and speaking with the staff, I decided it  
11 was important to go to the convention center to  
12 see firsthand what was transpiring.  
13 Q. And what happened when you went there?  
14 A. Upon arrival at the convention center,  
15 there was a series of protests, both pro and con,  
16 to Donald Trump's campaign. I made my way through  
17 that and went into the convention center where  
18 there were armed sheriff's officers and  
19 magnetometers set up. I went to the registration  
20 desk to ask for access as a representative of the  
21 Trump campaign to be allowed to see what was  
22 transpiring in the rooms behind the magnetometers

Page 739

1 and I was denied that access.  
2 Q. Now are we talking about the November  
3 4th or November 5th?  
4 A. So I went to the convention center on  
5 the 4th and the 5th, as well.  
6 Q. Now again what role were you playing at  
7 this point in the campaign?  
8 A. I was a senior advisor to the  
9 Trump/Pence 2020 campaign.  
10 Q. Now when you were there on the 4th, are  
11 you describing events of the 4th or the 5th, that  
12 you just described?  
13 A. On the 4th, when I originally attempted  
14 to enter the facility, I met with some individuals  
15 there and I went to the registration desk to be  
16 ask them if -- if Pam and I could have access, and  
17 we were summarily denied that access.  
18 So we did not stay at the convention  
19 center. We left and went back to the campaign  
20 headquarters.  
21 Q. And did you make any calls at that  
22 point after seeing what the conditions were at the

Page 740

1 center?  
2 A. I did. Pam and I had a conference call  
3 with at the time the campaign manager -- his name  
4 is Bill Stepien -- the deputy campaign manager,  
5 Justin Clark, the political director by the name  
6 of Nick Trainer, and we notified them that we were  
7 not given access to the convention center.  
8 Q. At some point on the 4th, did you speak  
9 with Mr. Giuliani?  
10 A. I did.  
11 Q. And can you describe those  
12 circumstances?  
13 A. I believe that Mayor Giuliani and Eric  
14 Trump also came to Philadelphia. There was a  
15 press conference that was originally held  
16 outside --  
17 Q. Excuse me, no. But did you call -- did  
18 you speak to Mr. Giuliani on the phone that day on  
19 the 4th?  
20 A. I don't know if I spoke to him on the  
21 4th directly, if it was the 4th or the 5th.  
22 Q. All right. And where was he when you

Page 741

1 called him, if you recall?  
2 A. Oh, I couldn't speak to it directly,  
3 but I did see Mayor Giuliani at a press conference  
4 outside of the airport with Eric Trump, and I  
5 believe that was on the afternoon of the 4th.  
6 Q. And where was Mr. Giuliani -- Giuliani  
7 coming from?  
8 A. I -- I believe he was in Washington,  
9 DC, because I -- if -- if my memory serves me, I  
10 would have seen him the evening before at the  
11 White House.  
12 Q. So my question really is, were you  
13 calling him for assistance of any kind?  
14 A. It -- it wasn't from me to ask for the  
15 assistance, but as someone who was familiar with  
16 the Trump campaign and someone who was familiar  
17 with election law, he was someone I would rely on  
18 for his advice and counsel.  
19 Q. And do you know what purpose -- what  
20 was his purpose in coming to your location?  
21 A. I believe -- and -- and I couldn't  
22 speak to it directly -- but he was asked to arrive

Page 742

1 from the campaign to come and help us ensure that  
2 the integrity of the process was taking place.  
3 Q. Okay. So, you've described the events  
4 of the 4th. What if anything happened on the 5th?  
5 A. To the best of my recollection, on the  
6 5th, the campaign attorney had gone into a court  
7 and asked for a document that would have provided  
8 us -- meaning the campaign officials -- access to  
9 the convention center. And upon arriving that  
10 morning at the convention center, I believe on the  
11 5th, I was provided a copy of that order from the  
12 commonwealth court.  
13 Q. So you attempted at that point to go  
14 into the center with this order?  
15 A. I did.  
16 Q. And tell us what happened.  
17 A. At first I began by being outside of  
18 the center with the order in my hand and having an  
19 impromptu press conference, which was widely  
20 covered. I then walked into the convention center  
21 and again approached the desk with the court order  
22 and asked to have access to the facility. I was

Page 743

1 asked to wait until a representative of  
2 Philadelphia Sheriff's Department could come down  
3 and speak with me. I asked to also have a  
4 conversation with the individual who was  
5 overseeing the facility.  
6 I waited probably 15 to 20 minutes on  
7 the side of the magnetometers where the public was  
8 allowed to remain, at which point an individual  
9 with the Philadelphia Sheriff's Office, who had  
10 three stars on his collar, told me that I would  
11 not have access to the facility and that if I  
12 crossed through the magnetometers I would spend  
13 three days in a Philadelphia jail.  
14 I reminded him that I have an order  
15 from the commonwealth court, and his response to  
16 me was, "They don't have a police department. I  
17 do".  
18 Q. So you showed him the order?  
19 A. I did.  
20 Q. And after he told you what you just  
21 said, what did you do?  
22 A. Pam Bondi turned to me and said -- and

Page 744

1 I'm paraphrasing -- "We're not going to jail so  
2 we're not going through here".  
3 Q. All right. What did you and Ms. Bondi  
4 do at that point?  
5 A. Being denied access by a police officer  
6 in uniform who just threatened me with jail for  
7 accessing the facility, I turned around and walked  
8 out of the facility.  
9 Q. Now, this -- this is on November 5th,  
10 correct?  
11 A. I believe that's correct.  
12 Q. At some point were you eventually able  
13 to gain access to the convention center?  
14 A. I was.  
15 Q. And what date was that?  
16 A. I believe that was the following day.  
17 Q. That was November 6th?  
18 A. I believe that's accurate.  
19 Q. All right. And tell us what happened  
20 then?  
21 A. Upon arrival at the convention center  
22 that day, I was able to go to the check-in desk

Page 745

1 where I was provided a credential that -- my name  
2 was on a list. I was given access through a  
3 credential that I -- a lanyard, which I put around  
4 my neck, and it said something to the effect of,  
5 you know, "authorized" or "poll watcher," or  
6 something of that nature.  
7 I walked into -- through the  
8 magnetometers and into the large, cavernous area  
9 where the machines were set up, and there was --  
10 looked to be where the counting had been  
11 transpiring in the past. I was provided access on  
12 the far side of the bike rack. So bike rack is  
13 about four feet high and it segregated out the  
14 access to the machines. And in this cavernous  
15 location, from my vantage point, it was all but  
16 impossible to see what was transpiring in the back  
17 of the room. I was -- I was taking pictures on my  
18 telephone when I was approached by a security  
19 guard who said to me, if I didn't turn over my  
20 phone, they would put me in jail. Again the  
21 sheriff's department responded. They again  
22 threatened me with going to jail if I didn't turn

Page 746

1 over my phone for taking pictures in that public  
2 facility. And then the individual who I believe  
3 was in charge of the facility, who I had spoken to  
4 the day previously, came over, told the sheriff's  
5 department that I was able to take pictures in  
6 that facility and they chose not to remove me or  
7 confiscate my telephone.  
8 Q. Now, did the order specify what you  
9 were permitted to do once inside?  
10 A. To the best of my recollection, Judge  
11 Canon's order allowed me access to --  
12 Q. No, it wasn't my -- it wasn't my order.  
13 A. Judge Canon.  
14 Q. Oh, I thought you said Kamins.  
15 A. No. I'm sorry. If you were writing an  
16 order, it would be different.  
17 But to the best my recollection, the  
18 order allowed me and the affiliates of the  
19 campaign to have access within six feet, due to  
20 COVID restrictions, of all counting which was  
21 transpiring in that particular room.  
22 Q. So what happened at -- at that point?

Page 747

1 A. When I entered the room -- I finally  
2 received the ability and the credentials to get  
3 into the room, and entered, I could see no  
4 additional counting transpiring. So the election  
5 was on Tuesday. This would have been I believe on  
6 Friday, when I finally had access to the facility.  
7 As I said, the room was extremely  
8 large. I was never allowed access past the bike  
9 rack or the makeshift barrier which was  
10 established. There were machines that were  
11 directly, probably six to eight feet in front of  
12 the bike rack, but nothing was moving through  
13 those machines at the time. And so I was never  
14 granted access to anything in that particular room  
15 other than being on the far side of the bike rack.  
16 Q. All right, and could you determine  
17 whether the ballots had already been separated  
18 from the envelopes or not?  
19 A. They sure looked like they had been  
20 separated, but again, the room is so large, it's  
21 probably 100,000 square feet. I mean, it's a  
22 monster room. It's -- there's this giant

Page 748

1 convention center. And what I could see very  
2 clearly, as close to the bike rack as possible,  
3 was a series of machines, which I believe were  
4 designed to have throughput to count the ballots  
5 themselves. None of those machines were actually  
6 running while I was in that room. There were some  
7 individuals who were working in the room, but they  
8 were far enough away from me that I could not see  
9 what they were doing and I couldn't identify those  
10 people.  
11 Q. Do you know a gentleman by Mr. -- last  
12 name Mercer?  
13 A. It's a fairly common name. Is there  
14 anyone more specific?  
15 MR. GIULIANI: Jeremy.  
16 BY MR. KAMINS:  
17 Q. His first name I believe is Jeremy.  
18 Just if you would -- well, you don't --  
19 you don't know Mr. Jeremy Mercer, correct?  
20 A. I don't believe I do.  
21 Q. All right. So under those  
22 circumstances, did you remain in the center or did

Page 749

1 you leave?  
2 A. After being in the facility for  
3 probably ten minutes, realizing that there was no  
4 counting going on, I couldn't see anything, even  
5 though I had access now to what I would determine  
6 would be the public area of the facility, I turned  
7 around and left.  
8 Q. All right. And were you involved any  
9 further with the election process at that point?  
10 A. My only further response to that would  
11 be that I went back to the campaign office, had  
12 some additional meetings and then participated in  
13 a -- a makeshift press conference, which  
14 transpired I think the following day.  
15 MR. KAMINS: All right. I have no  
16 further questions.  
17 MR. FOX: No questions. I have no  
18 questions.  
19 CHAIRMAN BERNIUS: Any -- any questions  
20 from the panel?  
21 MR. BROZOST: No, Mr. Chairman.  
22 CHAIRMAN BERNIUS: Ms. Murrell?

Page 750

1 MS. HAYNESWORTH-MURRELL: No.  
2 CHAIRMAN BERNIUS: Thank you, Mr.  
3 Lewandowski. You are excused.  
4 THE WITNESS: Thank you.  
5 (Witness is excused.)  
6 MR. KAMINS: Is Mr. Droz in the waiting  
7 room?  
8 MS. BORAZZAS: Yes, he is.  
9 MR. KAMINS: Thank you. If you could  
10 let him in, please.  
11 MS. BORAZZAS: I'm letting him in now.  
12 (John Droz on the witness stand.)  
13 CHAIRMAN BERNIUS: Mr. Droz, can you  
14 hear me?  
15 THE WITNESS: I can. Can you hear me?  
16 CHAIRMAN BERNIUS: Yes.  
17 Do you solemnly swear or affirm that  
18 the testimony you will give in this proceeding  
19 will be the truth, the whole truth and nothing but  
20 the truth, so help you god?  
21 THE WITNESS: I do.  
22 CHAIRMAN BERNIUS: You may proceed, Mr.

Page 751

1 Kamins.  
2 MR. KAMINS: Thank you, Mr. Chair.  
3 Whereupon,  
4 JOHN DROZ  
5 called as a witness on behalf of Respondent, and  
6 after having been first duly sworn, was examined  
7 and testified as follows:  
8 DIRECT EXAMINATION  
9 ON BEHALF OF RESPONDENT  
10 BY MR. KAMINS:  
11 Q. Good morning, Mr. Droz.  
12 A. Good morning, judge.  
13 Q. You could, no -- it's "Mr. Kamins" --  
14 (Echoing interference interrupts the  
15 proceedings.)  
16 MR. KAMINS: Okay. I'm not sure what  
17 just happened but I thought I was in another  
18 universe.  
19 MS. BORAZZAS: It sounds like maybe  
20 someone had the YouTube channel on, because it's  
21 delayed slightly.  
22 CHAIRMAN BERNIUS: Mr. Kamins, you may

Page 752

1 proceed.  
2 BY MR. KAMINS:  
3 Q. All right. I'll say it again, Mr.  
4 Droz. Good morning. You can you hear me?  
5 A. Is this Groundhog Day?  
6 Q. Is that a yes? You can hear me, Mr.  
7 Droz?  
8 A. Yes.  
9 Q. Mr. Droz, can you hear me?  
10 MS. BORAZZAS: Is his panel on, because  
11 it's delayed slightly?  
12 THE WITNESS: Should I have my volume  
13 on? I have my volume on. Uh-oh.  
14 (Discussion off the record.)  
15 BY MR. KAMINS:  
16 Q. Mr. Droz, can you hear me?  
17 A. Yes, I can.  
18 Q. Okay. Good morning and thanks -- thank  
19 you for being here.  
20 All right. Mr. Droz, do you hold any  
21 degrees?  
22 A. Yes. I have a -- a BS degree in

Page 753

1 mathematics, a BS degree in physics and an MS  
2 degree in physics.  
3 Q. Those are -- and is there a graduate  
4 degree or that -- that's what you just told us,  
5 the MS?  
6 A. Yes, the MS is a graduate degree from  
7 Syracuse University. The BS -- two BS degrees are  
8 from Boston College.  
9 Q. And do you -- are there any areas in  
10 which you have a specific expertise?  
11 A. Well, I'm -- I'm involved in quite a  
12 few things.  
13 Q. No, specifically I -- specifically with  
14 regard to physics?  
15 A. Well, in the area of physics I'm  
16 involved in energy matters, nationally, climate  
17 change matters, nationally; things of that nature.  
18 Q. All right. Are you currently employed?  
19 A. I retired when I was 34. So, no.  
20 Q. Can you describe what you did prior to  
21 your retirement?  
22 A. I worked for General Electric,

Page 754

1 Aerospace Electronics in Utica, New York. I was  
2 in middle management there by the time I retired.  
3 I also had employment at Monolithic Memories, a  
4 silicon OSI manufacturer in Silicon Valley, and  
5 for a short stint for Mohawk Data Sciences, as  
6 manager of their components engineering; all  
7 technical jobs.  
8 Q. Okay. After your retirement did you  
9 develop an interest in areas as -- as a science  
10 advocate?  
11 A. Yes. It seemed to me that there was a  
12 lot of people claiming that they were acting under  
13 the mantle of science when it wasn't actually so,  
14 and I think they were taking advantage of  
15 people, the average citizen that believes in  
16 science -- surveys have shown this -- but the  
17 dichotomy is that most people don't really know  
18 what science is.  
19 So I started off with environmental  
20 things. I was a member at the Sierra Club, stuff  
21 like that, trying to fight environmental fights,  
22 but I got more and more involved in science,

Page 755

1 trying to defend science.  
2 So that's probably been my career:  
3 trying to defend science.  
4 Q. Did you work on certain New York  
5 State-based or statewide issues after your  
6 retirement?  
7 A. Yes, I did. One of the environmental  
8 issues I got interested in was water-related  
9 things. So, for instance, in New York State they  
10 have a large amount of water available, where in a  
11 lot of the rest of the country, water is a  
12 scarcity.  
13 So, water companies -- people like  
14 Nestle -- people like that, were coming into  
15 upstate New York and drilling or tapping into  
16 water aquifers and then bottling the water.  
17 So for my particular community, such a  
18 project was proposed. Just to give you the size  
19 of it, they were talking about building a  
20 possessing facility in the neighborhood of 1M  
21 square feet, an enormous processing facility. So  
22 the problem was that in New York State there were

Page 756

1 no rules about commercial water extraction, so I  
2 worked with several other environmental groups.  
3 We got together and the bottom line was that we  
4 were able to pass, for the first time ever,  
5 commercial -- rules, state rules about limiting  
6 commercial water extraction, things of that  
7 nature.  
8 Q. All right. And over the years have you  
9 written any books?  
10 A. I have coauthored a variety of books  
11 but not solely authored.  
12 Q. And what subject matters have you  
13 written on?  
14 A. Energy things.  
15 Q. And have you written -- or do you write  
16 any blogs?  
17 A. Well, I have a Substack that might  
18 be -- you might call "blog," not entirely, where I  
19 post things. It's called Critically Thinking on  
20 Societal Issues. I do that like once a week.  
21 Q. Have you been selected to serve on any  
22 positions as a scientist?

Page 757

1 A. Well, yes, quite -- quite a few variety  
2 from organizations, whatever, but one example is  
3 that I am -- I was appointed to be a commissioner,  
4 North Carolina State commissioner on their Oil and  
5 Gas Commission, because of my knowledge about the  
6 energy matters. So I've been on that for a couple  
7 of years.  
8 Q. Have you been appointment as a senior  
9 fellow?  
10 A. There's been so many of these things  
11 that I don't remember all of them, but probably,  
12 yes.  
13 Another organization for instance that  
14 I'm involved with is called the CO2 Coalition.  
15 I have probably too many things on my  
16 plate, but yes.  
17 Q. Okay. Now after the presidential  
18 election on November 3rd, 2020, were you contacted  
19 by anyone in connection with the election?  
20 A. Yes. I get -- I get a lot of contacts.  
21 One thing I should have mentioned -- maybe you're  
22 calling it a blog -- I have a newsletter and that

Page 758

1 newsletter goes out every two weeks, and I have  
2 over 10,000 subscribers on that newsletter. It  
3 covers these topics I'm interested from COVID to  
4 climate; to renewables to religion; from education  
5 to energy.  
6 A lot of -- a lot of ground, and --  
7 Q. All right, now getting back to the --  
8 A. Well, I'm getting -- the answer to that  
9 is that I -- so because of these 10,000 plus  
10 subscribers, which is free, I got to know a lot of  
11 people. And a lot of people know me.  
12 So the answer to your question was,  
13 yes. After the election, out of the blue, an  
14 attorney called me, a woman. She identified  
15 herself, but I -- I'm a senior. I forgot what her  
16 name was. I didn't recognize it.  
17 Q. Did she identify herself as having  
18 any -- any affiliation?  
19 A. Well, she said she was working with a  
20 group of people who were trying to ascertain  
21 the -- again, this is two years ago, but ascertain  
22 the accuracy, the legitimacy, et cetera, et

Page 759

1 cetera, of the 2020 election. This is within a  
2 week or so of the election.  
3 Q. All right. And what did you tell this  
4 person when you spoke to her?  
5 A. Well, she was calling to solicit me.  
6 So, what she said was is that, "Are you interested  
7 in putting together a team of experts to help in  
8 this effort?"  
9 Q. And what did you say?  
10 A. I said, "Well, look, I'm -- I'm very  
11 interested in this topic". I said, "But from what  
12 you were asking me" -- she was talking about  
13 statistical analysis -- I said, "I -- I would need  
14 to get some other people who have PhDs in  
15 statistics. And I said, but as far as my position  
16 is, I am definitely concerned about it and I'd be  
17 willing to spend the time. But I would have to  
18 call up some of these statistics and IT PhDs and  
19 see if they were.  
20 "So, if we could put together a team of  
21 them, yes, I'd be willing to do it."  
22 Q. And as a result did you make contact

1 with these individuals that you were describing?  
2 A. Yes. I went through my -- my names  
3 that are on my subscribers of the newsletter, and  
4 I picked out four people that I had, you know,  
5 some reasonable conversant knowledge about and,  
6 rather than email them something, because this all  
7 seemed to be time is of the essence, I called  
8 every one of them on the phone and described what  
9 was asked of me. And the gist of it was, "Are you  
10 interested in volunteering time and effort to put  
11 together a statistical analysis report of some  
12 election data?" And (indecipherable) said yes.  
13 Q. Excuse me. How many people are we  
14 talking about?  
15 A. Four -- four people, to start with.  
16 Q. And did these people hold any degrees?  
17 A. They were all PhDs.  
18 Q. All right. And did you give an initial  
19 assignment to this group of individuals?  
20 A. No. The next thing that happened was  
21 is that this -- this woman, this attorney, said  
22 she was going to call me back the following day,

1 and she did, and so I reported to her what the  
2 results of my conversations were. I said, "Okay,  
3 I now have a team, the five of us". I said, "I'll  
4 be the team leader, the editor, so forth, and  
5 these people will write up -- do the research and  
6 write -- write the analyses of what they come up  
7 with". So I said, "We're ready to go".  
8 So I said, "What did -- what -- what  
9 specifically do you want us to do?"  
10 Q. Excuse me. Let me just see if we can  
11 get through this.  
12 Did the attorney who called tell you  
13 what she was looking for?  
14 A. Well, that's what I was just saying.  
15 She -- after I told her we had a team ready to go,  
16 I then said to her, "So now -- now specifically  
17 what do you want us to do?" Because she didn't  
18 say that before. And she said, "Well, we have  
19 a -- a fair amount of data on Pennsylvania. We'd  
20 like you to look at that and tell us what you  
21 see".  
22 Q. And did she send you any information or

1 data?  
2 A. Well, what she did was give me a link  
3 to a site where they had this data that was  
4 downloadable. It was, as I recollect, like four  
5 gigabits of data. It was pretty disorganized, to  
6 be quite frank with you. She -- so but -- she --  
7 and -- and one of the things I -- I was concerned  
8 about was whether she would be directing me to --  
9 to look for something specific, but she didn't.  
10 She didn't say, "Find problems with Trump or  
11 Biden". She just said, "We want you to look at  
12 the data and tell us what you conclude".  
13 Q. Right, so now that you have this team  
14 of four PhDs to work with, what was your role  
15 going forward?  
16 A. My role was to organize the whole  
17 thing, coordinate the thing. That's what I call  
18 being a team leader. I was the editor, you know,  
19 the mother, whatever. So, for --  
20 Q. Did you give -- did you give an  
21 assignment to each of these experts?  
22 A. Well, that's one of the challenges we

1 had. The first challenge is that I had to decide  
2 and that was whether we should do this as a group,  
3 in other words to give the same data and work  
4 together as a team of five people, or whether I  
5 should give this data to each of these people  
6 separately and see -- have them come up with their  
7 own conclusions.  
8 So I decided that we might have more  
9 interesting and valid results if we worked  
10 independently. So that's what I did.  
11 Q. And did you give them any type of a  
12 schedule to complete the assignment?  
13 A. What I did was -- well, okay. I  
14 skipped over that part here. Thank you.  
15 When I was speaking to this lawyer,  
16 after she told me the Pennsylvania data, I said to  
17 her, "So what time frame do we have to -- you're  
18 giving us to write a report here?" And she said  
19 "Two days".  
20 And I said, "Give me a break". I said,  
21 "Look, that's -- that's not possible. We can't do  
22 something in two days". And that was sort of

Page 764

1 indicative of the rush they were in.  
2 I said, "Look, we'll do the best we  
3 can, but I can tell you right now, it's not going  
4 to be two days".  
5 So, when I got this -- when I started  
6 looking at the -- the data they had on this  
7 website, I -- I gave that link to each of these  
8 four guys. They knew there were other people on  
9 the team, but they didn't work with them. I gave  
10 the same link to each of the four people and I  
11 said, "Look, do the best you can. Look at this  
12 data. See what -- see what jumps out at you as  
13 far as irregularities or unusual things,  
14 statistically or whatever, and write it up to me,  
15 send it in. I'd like to have it within a few  
16 days".  
17 Q. And was an initial report prepared?  
18 A. Yes. After several go 'rounds, they  
19 would send me their documents and a lot of times  
20 their -- their write-ups. And quite frankly, a  
21 lot of it was, you know, fairly academic. So that  
22 was one of the things I did, was to try to

Page 765

1 translate what they were saying here to be  
2 understandable by -- more understandable by a  
3 layperson. So there was -- there was a lot of  
4 that.  
5 But after -- after I did it every time,  
6 I went through and did fairly heavy editing on  
7 each one of them. I would send it back to the  
8 original author and say, is this fair enough or  
9 did I miss anything or mischaracterize something?  
10 And so we would go back and forth, and  
11 it took a while to do that, but the bottom line  
12 was -- and in addition, I wrote an introduction on  
13 my own, and I wrote a summary at the end. So  
14 those two parts I did just by myself.  
15 So there were five chapters. One of  
16 the four people decided they got so enthused that  
17 they wanted to do two chapters --  
18 Q. Excuse me. Let me just cut you off. I  
19 just wanted to go --  
20 So an initial report was prepared?  
21 A. Yes. That's what I was telling you.  
22 Q. Okay.

Page 766

1 A. We had the five chapters and an  
2 introduction and a summary --  
3 Q. I'm sorry. I'm sorry.  
4 A. That was the report.  
5 Q. Excuse me for interrupting. So the  
6 answer to that is yes?  
7 A. Yes.  
8 MR. KAMINS: Okay. So could we have  
9 Respondent's Exhibit 11 put up on the screen.  
10 BY MR. KAMINS:  
11 Q. Is this the initial report, Mr. Droz,  
12 that was --  
13 A. Yes, it is.  
14 Q. All right. And did you send this  
15 initial report to anyone?  
16 A. The same person that had contacted me,  
17 that I forgot her name, she gave me a list of 12  
18 people to send it to. And for this -- this  
19 particular circumstance, one of the people was an  
20 associate of Mr. Giuliani: Maria Ryan.  
21 Q. And was -- was this sent on the -- the  
22 date of the report, the 16th?

Page 767

1 A. Yes, it was. I just double-checked  
2 that, again, and yes it was, the 16th.  
3 Q. Okay, now with respect to this --  
4 MR. KAMINS: You could take the report  
5 down. Thank you.  
6 BY MR. KAMINS:  
7 Q. Now with respect to this report, can  
8 you identify the individuals who contributed to  
9 this report?  
10 A. Well, the authors -- they did more than  
11 contribute. The authors of each chapter are  
12 identified in the chapter. The first chapter is  
13 done by Dr. Tony Cox from Colorado, Denver  
14 Colorado; the second is Dr. Stan Young, PhD from  
15 Raleigh, North Carolina; the third -- third and  
16 fourth chapters are done by Dr. Cornell, whose  
17 from Austin, Texas, and lastly Dr. William Briggs,  
18 I believe is from New York City.  
19 Q. Now other than having PhDs, are there  
20 any other credentials you can tell us of -- of  
21 each of these individuals?  
22 A. Well, I -- I've written up each one of

Page 768

1 their credentials. They are extensive. So  
2 they're a lot more than just PhDs. They are  
3 members of a lot of things and each one is  
4 extensive.  
5 Q. All right. Anything specific you'd  
6 like to bring to our attention as far as their  
7 expertise?  
8 A. Well, every one of them is extensive.  
9 These are -- these are really sophisticated  
10 people.  
11 If it were me, if I was conveying this  
12 to a citizen, probably the easiest chapter to read  
13 would be chapter two.  
14 Q. All right, well, let me -- let me go --  
15 I just wanted to ask that question about their  
16 credentials here.  
17 You're saying that each of them were  
18 extensively credentialed --  
19 A. Yes.  
20 Q. -- in certain areas?  
21 What areas were they credentialed in?  
22 A. Well, most of them were in statistics.

Page 769

1 Eric was also involved a lot in computer  
2 technology, things of that nature. He had more of  
3 an engineering slant to it, but very much into IT  
4 and -- I'm in a senior moment here -- artificial  
5 intelligence, AI I started to say.  
6 Yeah, essentially that was their main  
7 things, for three of them any ways.  
8 Q. Now was there an overarching goal in  
9 this -- for you in this report?  
10 A. The goal was to come up with an  
11 accurate assessment of what we saw. So that's  
12 what I assigned them, each one. I said, "Look at  
13 this data. Write up something about what jumps  
14 out at you". That's all I told them.  
15 Q. With respect to statistical anomalies,  
16 was there a goal?  
17 A. Not really.  
18 Q. Were you attempting to find out whether  
19 or not there were statistical anomalies?  
20 A. Well, yes. We were certainly trying to  
21 find out whether there was anything unusual. So  
22 if -- if each of these guys looked at the data and

Page 770

1 said, "Hey, everything looks within the realm of  
2 normality," well, that'd be fine.  
3 But the -- the interesting thing to me  
4 was -- I -- I thought that they'd come back and  
5 point out the same things that they saw. But it  
6 didn't turn out that way. Each one of them picked  
7 on something that was an anomaly that was somewhat  
8 different from what the others did.  
9 MR. FOX: I'm trying to object.  
10 We are going to get to the substance of  
11 the report and I think we need to -- before we do  
12 that -- I'm not sure what capacity this gentleman  
13 is testifying in, but it appears to be an expert  
14 capacity, and I think we need to have him  
15 qualified as an expert before we get into the  
16 substance of this report by other people.  
17 MR. KAMINS: Well, I think Mr. Droz is  
18 reporting on what his role was in preparing the  
19 report, rather than the substance of the report.  
20 THE WITNESS: Well, no. I would say  
21 we're talking about the substance besides.  
22 CHAIRMAN BERNIUS: Is this -- is this

Page 771

1 report in evidence?  
2 MR. FOX: No, I've objected to it.  
3 MR. KAMINS: Well, we've offered it but  
4 it's been objected to by Mr. Fox.  
5 CHAIRMAN BERNIUS: Okay. Well, if it's  
6 not in evidence, I'm not sure it's appropriate at  
7 this time for him to testify as to its contents.  
8 So Mr. Kamins, you want to address that  
9 issue? Are you going to offer this in evidence?  
10 MR. KAMINS: Yes. Yes, your Honor, we  
11 would offer Respondent's 11 into evidence.  
12 CHAIRMAN BERNIUS: For what purpose?  
13 MR. KAMINS: For the purpose of  
14 establishing statistical anomalies that were found  
15 by the individuals who prepared the report: the  
16 four PhDs as well as Mr. Droz' editing.  
17 CHAIRMAN BERNIUS: So it's being  
18 offered for the truth of its contents?  
19 MR. KAMINS: Yes. Yes, it is.  
20 CHAIRMAN BERNIUS: Mr. Fox?  
21 MR. FOX: Obviously it's hearsay.  
22 Obviously we don't have the people who wrote the

Page 772

1 report here to testify. We don't know what the  
2 data is that it was based on, other than it was  
3 something that was sent to Mr. Droz by a lawyer.  
4 We don't know anything much about the credentials  
5 of the people. I can't cross-examine them. Mr.  
6 Droz has not been qualified as an expert...  
7 So I oppose the admission of this  
8 report.  
9 MR. KAMINS: Well, your -- Mr. -- Mr.  
10 Chair, we're also offering it to establish Mr.  
11 Giuliani's state of mind, since he was given this  
12 information prior to his oral argument on November  
13 17th and prior to the preparation of the second  
14 amended complaint. So the information in here  
15 was -- and as Mr. Giuliani will testify later --  
16 was something that he received.  
17 So for that purpose we are offering it,  
18 as well.  
19 CHAIRMAN BERNIUS: Mr. Fox, on that  
20 issue?  
21 MR. FOX: Well, initially I thought the  
22 chair asked Mr. Kamins if we were -- if this was

Page 773

1 being offered for the truth, and he said yes.  
2 If it's being offered -- if it's -- if  
3 it's being offered for Mr. Giuliani's state of  
4 mind, Mr. Giuliani can testify about it, but Mr.  
5 Droz doesn't get to testify like an expert about  
6 the contents of the report.  
7 Mr. Giuliani can testify about how it  
8 affected his state of mind.  
9 CHAIRMAN BERNIUS: I -- I -- I agree.  
10 I think at this point I'm going to sustain the  
11 objection, Mr. Kamins. Mr. Giuliani -- Mr.  
12 Giuliani can -- can testify as to the  
13 circumstances of his review of the report and its  
14 effect on his state of mind.  
15 MR. KAMINS: Well, Mr. Chair, if I  
16 could ask Mr. Droz some questions about his work  
17 in the election integrity area, perhaps you -- you  
18 would revisit the -- the introduction of the  
19 report.  
20 CHAIRMAN BERNIUS: Well, you're free to  
21 do that, but I've already -- I think he already  
22 said that he's not a statistical expert and he's

Page 774

1 relying on others. So --  
2 MR. KAMINS: Well, let me --  
3 CHAIRMAN BERNIUS: I'm not going to --  
4 I'm not going to preclude you from trying to  
5 rehabilitate him, but...  
6 BY MR. KAMINS:  
7 Q. All right. Mr. Droz, after the  
8 election, did you begin to do more work in the  
9 area of election integrity?  
10 A. Yes, I did.  
11 Q. And could you describe what work you  
12 did?  
13 A. I put up a website that has not only  
14 this report but I and the team here generated 10  
15 total reports. Out of those 10, three of them  
16 were -- I was the primary author. For instance,  
17 one that I was the primary author was about  
18 post-election audits. No one else in the country  
19 has written a report about what forensic  
20 post-election audits ought to be. So I am the  
21 expert in the country, as far as that goes, in  
22 that regard, since no one else has published

Page 775

1 anything about that. I am also on three  
2 different -- I don't know, what you were calling  
3 here -- there's Zoom meetings by three different  
4 groups: one is Clela Mitchell and her  
5 association -- her organization. They have been  
6 meeting for a year and a half. I was initially  
7 invited to be a member of that very select group  
8 of 50 people throughout the whole United States.  
9 So one person per state, I was invited, and I've  
10 been on that...  
11 Second of all, Heritage Foundation has  
12 a -- a weekly meeting as well. I was also invited  
13 to be on that and have been on that for over a  
14 year...  
15 Third of all, in North Carolina, I was  
16 one of the cofounders of an organization called  
17 NCIT, which is an election integrity organization.  
18 Now it has over 500 members. They have a weekly  
19 meeting. So I participate when I'm available on  
20 that.  
21 I've written numerous articles about it  
22 on Substack, et cetera, et cetera, et cetera.

Page 776

1 Q. When you say --  
2 A. I'd like to clarify one thing.  
3 The member of the board there said --  
4 Robert -- said that I wasn't statistically -- I  
5 don't know exact words here -- I don't have a PhD  
6 in statistics, but as a physicist, believe me. I  
7 need to know a fair amount about numbers and  
8 statistics. And that's really what this report's  
9 about. It's a report about numbers. And  
10 that's -- I am unequivocally knowledgeable if not  
11 an expert on numbers. I have a math degree.  
12 MR. KAMINS: All right, Mr. Chair. I  
13 would renew my application to admit the exhibit.  
14 MR. FOX: Objection.  
15 I -- first of all, he didn't even write  
16 most of it. He wrote -- he wrote an -- an  
17 introduction. Second, I don't know what his  
18 expertise is. I mean, what is this being offered  
19 for? I mean, is -- is this man an expert and if  
20 so what is his expertise? I haven't heard any --  
21 you know, he's being offered as an expert in what?  
22 CHAIRMAN BERNIUS: Well, I'll tell you,

Page 777

1 let me -- let me short circuit this. The -- this  
2 evidence is going to come in. There's no --  
3 there's no hearsay exclusion. And -- and -- so  
4 I'll -- I'll admit it for the purpose of state of  
5 mind of the -- of the respondent.  
6 But I can tell you, Mr. Kamins, to have  
7 this witness talk about what the contents of the  
8 report are, I mean, it's our -- it's our judgment  
9 to assess the weight of that evidence, and  
10 frankly, based on the -- the testimony so far,  
11 it's not going to effect much if he goes through  
12 with a dramatic reading of this. I don't -- I  
13 don't see that it's going to move the ball, but  
14 you can go ahead and do it if you want.  
15 MR. KAMINS: Well, I certainly can ask  
16 some general questions, and then Mr. Giuliani can  
17 supplemental this when he testifies, as -- as to  
18 what he was aware of.  
19 CHAIRMAN BERNIUS: Okay, but, as I  
20 suggested, I wouldn't spend a lot of time with  
21 this witness on the contents of the report.  
22 MR. KAMINS: All right. I appreciate

Page 778

1 that.  
2 BY MR. KAMINS:  
3 Q. So, Mr. Droz, could you just give us  
4 generally what the takeaway was from the -- from  
5 the four experts who wrote their reports?  
6 A. Well, I wrote the summary, and of  
7 course again, all these materials were passed by  
8 these people. So they were in concurrence of it.  
9 So if you look at the -- the last page  
10 of it, it says several summarized conclusions, but  
11 probably the most significant one that would be  
12 generally pertinent here is that -- the conclusion  
13 was that there was approximately something in the  
14 order of 300,000 votes in the Pennsylvania 2020  
15 election that were suspect.  
16 Q. And was there any conclusion as to the  
17 statistical anomalies or aberrations in the  
18 election in that -- in that state?  
19 A. Well, that was the sum and substance  
20 conclusion from these statistical anomalies; that  
21 there were some 300,000 votes that were suspect.  
22 Q. And were they in certain counties or

Page 779

1 all counties?  
2 A. No, the -- chapter two explains which  
3 counties they were. There's a graph there that  
4 shows every one of the 67 counties, pretty easy to  
5 understand, shows which ones are abnormal. And  
6 there's about 10 out of the 67 that have a  
7 significant statistical abnormality, all in the  
8 favor of Biden.  
9 Q. Anything further as to the conclusions?  
10 A. One thing that we said, we tried to be  
11 careful on how we wrote this. One of the authors  
12 used the term "fraud" a few times. In subsequent  
13 versions I took that out, with his consent.  
14 Q. Why did you -- why did you take the  
15 word "fraud" out?  
16 A. Well, because these were written by lay  
17 people. They weren't lawyers. And he was -- he  
18 was writing as a layperson that he thought there  
19 would be fraud. So I discussed with him, which I  
20 should have done in the first place, but again, we  
21 were under a lot of pressure here to do this  
22 pretty quickly.

Page 780

1           So I discussed with him and, said, "You  
2 know, there's -- there's connotations to that word  
3 that, from a lawyer point of view here, intention,  
4 all that kind of other stuff". I said, "We -- we  
5 should stick to saying there's anomalies here".  
6 And so he agreed.  
7           And so if you look at --  
8           CHAIRMAN BERNIUS: I'm not sure -- I'm  
9 not sure what this line of question is designed  
10 to -- or what these answers add to the -- to this  
11 case.  
12           MR. KAMINS: I'm attempting -- I'm  
13 attempting to establish the impartiality or -- of  
14 their -- of their process. But that's -- I'll --  
15 I'll end here, Mr. Chair.  
16           MR. FOX: Is it up to me?  
17           CHAIRMAN BERNIUS: I think -- I think  
18 Mr. Kamins said he's done.  
19           MR. KAMINS: Yes.  
20           MR. FOX: Oh, I apologize.  
21           CROSS-EXAMINATION  
22           ON BEHALF OF DISCIPLINARY COUNSEL

Page 781

1           BY MR. FOX:  
2           Q. Mr. Droz, my name is Hamilton Fox.  
3           A. Hello, Mr. Fox.  
4           Q. Just a couple questions.  
5           A. Sure.  
6           Q. You said on page four of your  
7 introduction that -- that your "Scientific  
8 analysis could not identify exactly what happened  
9 or prove that fraud was involved. Honest  
10 mistakes, unintentional computer glitches, et  
11 cetera, can and do happen".  
12           Am I -- do I have that right?  
13           A. That's exactly right.  
14           Q. And your recommendation, in fact you  
15 say "Our strong recommendation is that each of the  
16 five Pennsylvania counties has an audited  
17 recount".  
18           Is that your recommendation?  
19           A. A legitimate audit. We -- we've  
20 qualified that in further and the later courses to  
21 say like a forensic audit, not just a -- a number  
22 audit. But yes.

Page 782

1           Q. And are you aware that there was a  
2 post-election, risk limiting audit in Pennsylvania  
3 that was concluded in February of 2021?  
4           A. Well, I want people made to understand  
5 that, but as I said, I wrote the report on audits.  
6 A risk-limiting audit is a very superficial, not  
7 very meaningful audit.  
8           Q. Well, my question was are you aware  
9 that there was such an audit?  
10           A. I'm not a aware of it, no.  
11           Q. Okay. And you are not aware that they  
12 sampled 45,000 random selected ballots from 63  
13 counties?  
14           A. Again, that's a misleading thing here.  
15 That's just a -- a number -- it's just like adding  
16 up the arithmetic on your IRS form. Just because  
17 the numbers add up doesn't mean it's right.  
18           Q. Are you aware that the results mirror  
19 the results of the presidential election to within  
20 a fraction of a percentage point?  
21           A. We're not talking about the numbers  
22 being added up. The talk -- the question is

Page 783

1           whether the votes are legitimate: did somebody  
2 vote twice, for instance, was this person a  
3 citizen, and so forth. None of those things were  
4 checked out.  
5           Q. Were you aware that the -- that the  
6 limited audit found no evidence of fraud?  
7           A. They didn't look for fraud. So, yes, I  
8 would be aware of that. That's an impossibility.  
9 They didn't look for fraud.  
10           Q. All right. Now are you aware that  
11 certain republican senators in Pennsylvania have  
12 announced that they've hired a company to pursue a  
13 forensic audit? Are you aware of that?  
14           A. I've heard a lot of stories. I'm not  
15 sure specifically. I know Doug Mastriano was  
16 talking about that at one point. I'm not sure who  
17 you're -- specifically you're talking about.  
18           Q. Are you aware that they never published  
19 the results of that audit?  
20           A. As I said, I'm not -- not aware  
21 specifically of what you're talking about.  
22           MR. FOX: Okay. Could I -- and I've

Page 784

1 forgotten the exhibit number, but if I could ask  
2 the trial director to put up the report Lost Not  
3 Stolen. This has been marked as -- for -- for  
4 identification as Disciplinary Counsel Exhibit 51.  
5 BY MR. FOX:  
6 Q. Are you familiar with this report,  
7 "Lost Not Stolen: The Conservative Case That Trump  
8 Lost and Biden Won the 2020 Presidential  
9 Election"?  
10 A. No, I'm not.  
11 MR. FOX: Can you -- can you just blow  
12 up the names of the authors of this report.  
13 BY MR. FOX:  
14 Q. Are you familiar with any of these  
15 gentleman?  
16 A. Well, I -- I've heard of John Danforth.  
17 Let's see. The other people. I'm not familiar  
18 with any of those other people, no.  
19 Q. You're not aware -- okay. And you  
20 haven't read their report?  
21 A. That's correct.  
22 Q. And you haven't read specifically the

Page 785

1 portion of the report that relates to  
2 Pennsylvania?  
3 A. That's correct.  
4 MR. FOX: I have no further questions  
5 of this witness.  
6 CHAIRMAN BERNIUS: Anything else, Mr.  
7 Kamins.  
8 REDIRECT EXAMINATION  
9 ON BEHALF OF RESPONDENT  
10 BY MR. KAMINS:  
11 Q. Mr. Droz, you were asked about a  
12 limited audit. In what sense was it limited?  
13 A. Well, he said it was a risk-limiting  
14 audit. Basically all it is is adding up the  
15 numbers.  
16 The comparison I tell people is, if you  
17 look at the IRS, what they do, they're most basic  
18 audit is, when you send in a 1040, they add up the  
19 numbers to make sure everything adds up. If they  
20 don't, they send you back something.  
21 That's essentially what a risk-limiting  
22 audit is. It doesn't look at the legitimacy of

Page 786

1 the numbers or any of that. It just says, do the  
2 numbers add up. That's a fairly meaningless  
3 audit.  
4 Q. Is that different from a forensic  
5 audit?  
6 A. Yes. That would be more -- a forensic  
7 audit, that would be more consistent with higher  
8 level of IRS audits, where they have an audit  
9 where you go to their office and go through some  
10 details, or a full audit where you have to account  
11 for every single line item on your -- your forms.  
12 Those are much higher-level audits.  
13 And despite that -- the interesting  
14 thing is despite that, there is only 87%  
15 compliance with the IRS. So, despite having all  
16 levels of audits, despite having serious financial  
17 and legal complications, if you violate the law,  
18 they have only 87% compliance.  
19 So, to say we have better than 87%  
20 compliance in election integrity is pie-in-the-sky  
21 talk, but even if it was 87%, that's roughly  
22 one-eighth of the people who would be

Page 787

1 noncompliant. So out of 160M votes in the United  
2 States for a presidential election, that would  
3 mean 20M people vote that are not accurate, 20M  
4 people. That would be one-eight. That would be  
5 87%.  
6 Q. I see. Thank you, Mr. Droz.  
7 MR. KAMINS: I have nothing further.  
8 CHAIRMAN BERNIUS: Mr. Fox?  
9 MR. FOX: I have nothing further.  
10 CHAIRMAN BERNIUS: Anything further  
11 from the panel.  
12 (Hearing none.)  
13 CHAIRMAN BERNIUS: Thank you, Mr. Droz.  
14 You are excused.  
15 (Witness is excused.)  
16 CHAIRMAN BERNIUS: Your next witness,  
17 Mr. Leventhal.  
18 MR. LEVENTHAL: It'll be Christina  
19 Bobb. May I have one moment to get a document,  
20 your Honor?  
21 CHAIRMAN BERNIUS: Is she in the  
22 waiting room, Meghan?

Page 788

1 MS. BORAZZAS: Yes, she is.  
2 CHAIRMAN BERNIUS: Okay, well, let's --  
3 let's take --  
4 How long will her testimony take, do  
5 you think?  
6 MR. LEVENTHAL: Maybe 15 minutes and  
7 Mr. --  
8 CHAIRMAN BERNIUS: Okay, let's take  
9 five minutes to five 'till 12:00, and then we'll  
10 resume with your next witness.  
11 MR. KAMINS: All right. Thank you.  
12 MS. BORAZZAS: I will open up the  
13 breakout rooms now.  
14 (Recess taken.)  
15 CHAIRMAN BERNIUS: Mr. Leventhal, are  
16 you going to take this witness?  
17 MR. LEVENTHAL: May I?  
18 CHAIRMAN BERNIUS: I -- I don't see Mr.  
19 Kamins anywhere, so.  
20 MR. KAMINS: No, I'm sitting right next  
21 to him.  
22 MR. LEVENTHAL: No, no. We're -- we're

Page 789

1 switching off, if that's okay.  
2 MR. KAMINS: I'm right next to him.  
3 CHAIRMAN BERNIUS: Will -- will  
4 respondent call his next witness, please.  
5 MR. LEVENTHAL: Mr. Chair, we'd like to  
6 call -- and members of the panel, we'd like to  
7 call Christina Bobb.  
8 MS. BORAZZAS: Just letting her in now.  
9 (Christina Bobb on the witness stand.)  
10 THE WITNESS: Hello. Can you hear me  
11 okay?  
12 MR. LEVENTHAL: Yes, I can hear you.  
13 Does everyone --  
14 THE WITNESS: Okay, very good.  
15 MR. LEVENTHAL: Everyone else hears Ms.  
16 Bobb?  
17 CHAIRMAN BERNIUS: Okay. Ms. Bobb, do  
18 you solemnly swear or affirm that the testimony  
19 you will give in this proceeding will be the  
20 truth, the whole truth and nothing but the truth,  
21 so help you god.  
22 THE WITNESS: Yes, I do.

Page 790

1 CHAIRMAN BERNIUS: You may proceed.  
2 MR. LEVENTHAL: Thank you.  
3 Whereupon,  
4 CHRISTINA BOBB  
5 called as a witness on behalf of Respondent, and  
6 after having been first duly sworn, was examined  
7 and testified as follows:  
8 DIRECT EXAMINATION  
9 ON BEHALF OF RESPONDENT  
10 BY MR. LEVENTHAL:  
11 Q. Ms. Bobb, could you tell us what you  
12 currently -- how you're employed?  
13 A. Sure. I currently work as an attorney  
14 for the Donald Trump for President 2024 Campaign.  
15 Q. And -- and where are you now?  
16 A. I'm at my home in Jupiter, Florida.  
17 Q. Okay. And do you hold any degrees?  
18 A. I do. I have a Bachelor's in English  
19 linguistics, a masters in business, a JD law  
20 degree, and an LLM, in national security law.  
21 Q. Okay, and what were your former  
22 positions before working on the Trump 2024

Page 791

1 Campaign?  
2 A. Sure. So, I served in the United  
3 States Marine Corps as a judge advocate. I served  
4 overseas in Afghanistan as well as Stuttgart,  
5 Germany. I was a defense counsel out of Quantico,  
6 Virginia. I worked -- I left -- after I left the  
7 military, I went to Higgs Fletcher -- I'm sorry,  
8 rather I was deployed to Afghanistan for a tour,  
9 and then I went to a law firm in San Diego, as a  
10 civilian of course, and practiced there litigation  
11 for not quite four years; missed the national  
12 security aspect, so I mobilized as a reservist to  
13 Stuttgart, Germany, and then I ended up -- I ended  
14 up in Washington, DC and worked in the Trump  
15 administration as the executive secretary of the  
16 Department of Homeland Security and then joined  
17 One America News as a journalist after that, and  
18 then recently joined the Trump Campaign.  
19 Q. And in One American News you were a  
20 reporter, investigative reporter?  
21 A. Yes. I was a reporter and  
22 television -- television show host.

Page 792

1 Q. And was that investigative reporting,  
2 as well?  
3 A. Yes.  
4 Q. And when you went to Afghanistan and  
5 Stuttgart, Germany, was that as a member of JAG  
6 or -- or as a --  
7 A. That was as a United States Marine,  
8 yes.  
9 Q. As a -- okay. All right.  
10 Now, how did you come into the Trump  
11 2020 campaign, not the 2024?  
12 A. Sure. So I didn't come in until of  
13 after the election. I was a reporter. I was  
14 reporting on the election and then, when we saw  
15 what happened in 2020, I had a lot of questions  
16 and wanted to investigate further.  
17 So I was looking into it and then, you  
18 know, maybe a week or two after -- not quite two.  
19 I want to say maybe 10 days after the election I  
20 realized that, you know, a lot of the attorneys  
21 were leaving, across the country. You know, the  
22 campaign kind of shut down and it didn't appear

Page 793

1 that the apparatus was in place to continue a  
2 legal investigation.  
3 So, through my contacts I got in touch  
4 with Mayor Giuliani and volunteered my services.  
5 I -- I cleared it through One America News to make  
6 sure they would be okay if I was basically doing  
7 both, and they were. And so I reached out to him  
8 and let him know that if he needed legal  
9 assistance, I was an attorney. I had litigated  
10 and I was willing to participate. So he had me  
11 come by the office, meet with him and then --  
12 Q. Okay, all right. May I ask. Where was  
13 that office?  
14 A. It was in Arlington, Virginia. I  
15 believe I was in the Roslyn neighborhood. It was  
16 the RNC campaign headquarters.  
17 Q. And could you describe the situation --  
18 when did you arrive at that office.  
19 A. I don't remember the exact day, but I  
20 want to say it was about November 12th. I know it  
21 was a few days before the first amended complaint  
22 was filed. So whenever that was, it was a couple

Page 794

1 of days before that.  
2 Q. Okay.  
3 A. And --  
4 Q. Can you describe -- could describe the  
5 situation when you arrived?  
6 A. Yes, sir -- so --  
7 Q. In the office?  
8 A. -- when I got there --  
9 Q. In the office.  
10 A. Oh, I'm sorry?  
11 Q. Describe the situation in the office.  
12 A. Yes, yes. It was very chaotic. As you  
13 can imagine there were -- not -- not just for the  
14 legal staff, but for the campaign and for  
15 everybody involved, because people weren't sure if  
16 they were sticking around, you know, "Are we going  
17 to stay and fight it or do we leave?" And some  
18 people were quitting, and then others were upset  
19 that people were packing up.  
20 And then the actual legal situation was  
21 chaotic as well, because you had campaign lawyers:  
22 some were staying; some were leaving; who was

Page 795

1 staying; who was leaving. You had people running  
2 around trying to get information and actually work  
3 the case.  
4 You know, in the actual conference room  
5 where the attorneys that were staying were all  
6 kind of working together and everything, you had  
7 the big whiteboard with all of the different  
8 states put up there and someone charting out, you  
9 know, what was happening in each state and what  
10 could they do, or, you know, what had been tried  
11 and didn't work, and phones ringing, papers  
12 flying, couriers running.  
13 I mean, my first day there, you know,  
14 it was a little bit hard to tell the difference  
15 between like who was staying and who was going  
16 and -- and all that, but, you know, I figured it  
17 out pretty quickly.  
18 So, yeah, I would say --  
19 Q. If I may --  
20 A. -- it was generally a pretty chaotic  
21 moment.  
22 Q. If I may, was it your understanding

Page 796

1 that Mr. Giuliani was the coordinator or running  
2 the point on all of the litigations in all the  
3 states, not necessarily that he was the -- the  
4 lawyer who was litigating --  
5 A. Yes.  
6 Q. -- but he was the coordinator, right?  
7 A. Yes. That was absolutely his  
8 responsibility. And -- I think he had come in  
9 maybe a week before me. I don't remember exactly  
10 when he started, because obviously it was before I  
11 did. But my understanding was that there was  
12 basically confusion across the country on the  
13 legal strategy, because attorneys had been paid  
14 through the campaign, and technically the campaign  
15 was over. And so a lot of them thought they were  
16 done. And so he came in and stepped in to kind of  
17 be the -- the guiding voice on the direction  
18 things were going, because -- honestly nobody else  
19 really knew. It was -- it was quite chaotic and  
20 no one knew whether -- I shouldn't say no one  
21 knew. It wasn't clear to me anyway, you know,  
22 were these legal contracts -- were they required

Page 797

1 to stay on, because the campaign, from our  
2 perspective, wasn't over yet, but technically the  
3 election was over. So there were a lot -- a lot  
4 of usual questions, and he stepped up to be the  
5 one to make those decisions basically.  
6 Q. Okay. And I understand from what you  
7 just said -- I was going to ask you about it --  
8 but I understand from what you just said that it  
9 appears that lawyers were stepping off who entered  
10 appearances or who --  
11 A. Yes.  
12 Q. -- or who were -- were quitting all the  
13 time?  
14 A. Yes. That's my understanding. Both  
15 from being there, I saw the kind of chaos of  
16 people trying to figure out who was going to be  
17 doing what, as well as I believe I had read it in  
18 the news, as well.  
19 Q. And you weren't directly involved in  
20 Pennsylvania, right? You were involved in maybe  
21 New Mexico, Arizona and Michigan, or Arizona  
22 and --

Page 798

1 A. That's correct. I was primarily  
2 focused on Arizona and Michigan, and then New  
3 Mexico came later. But I was in the room working  
4 with the same attorneys who were doing  
5 Pennsylvania.  
6 So even though I -- I wasn't working on  
7 it --  
8 Q. And you were --  
9 A. -- I was there while they were.  
10 Q. I'm sorry. I interrupted you. Excuse  
11 me.  
12 MR. LEVENTHAL: Did -- did -- did the  
13 reporter hear her statement, because I -- I was --  
14 I was talking at the time?  
15 THE COURT REPORTER: Yeah, I heard her.  
16 MR. LEVENTHAL: Okay.  
17 BY MR. LEVENTHAL:  
18 Q. So, Ms. Bobb, you said there were  
19 attorneys in Pennsylvania. Do you remember who  
20 some of those attorneys were who were there in  
21 Arlington?  
22 A. Yeah. So there were a couple different

Page 799

1 teams. Some were present in Arlington working on  
2 Pennsylvania. I would say that would have been  
3 Joe diGenova, Vicky Toensing, Katherine Friess.  
4 Very briefly Matt Story was there, but that was  
5 just for like a couple days. It wasn't a  
6 lengthy -- he -- he wasn't like the main part.  
7 Those were the attorneys working on the  
8 Pennsylvania case that I specifically remember in  
9 the room, and then --  
10 Q. Do you remember -- do you remember  
11 who --  
12 A. -- I remember Linda Kearns, Bruce  
13 Marks. I remember an attorney named Hicks. I  
14 can't remember his first name.  
15 But those were the ones that I  
16 understood to be local counsel on the ground in  
17 Pennsylvania.  
18 Q. Okay. The -- who was giving Mr.  
19 Giuliani information regarding irregularities or  
20 potential fraud or -- or what we would call  
21 anomalies --  
22 A. Right.

Page 800

1 Q. Who was --  
2 A. Well, there were a lot of people giving  
3 him information. Bernie Kerik was the main  
4 investigator, who obviously they have a long  
5 history. So everybody respected that. So he, in  
6 theory, was kind of the funnel, but it was so  
7 chaotic. I -- I think the mayor was getting it  
8 from a number of different places: from the  
9 attorneys on the ground in Pennsylvania directly,  
10 from the attorneys in the office, from  
11 investigators on the ground in Pennsylvania,  
12 investigators in the office. I mean, it was  
13 coming from a million different directions.  
14 But -- but Bernie Kerik was the lead  
15 investigator.  
16 Q. So -- so he was one of the mains  
17 funnels of information to Mr. Giuliani. In  
18 addition, things were coming in all -- from other  
19 people all over the place.  
20 Is that -- is that a correct  
21 characterization of your testimony?  
22 A. Yes, sir, it is.

Page 801

1 Q. And if someone were to say that Mr.  
2 Giuliani only had about 15 affidavits at the time  
3 of November 15th or 17th, would that be your --  
4 would that be your -- your --  
5 A. No. No, no, no. There were a lot more  
6 than that. I remember them talking about hundreds  
7 of affidavits.  
8 So, no, I -- it was -- it was hundreds  
9 of affidavits. It was not just 15.  
10 Q. And we're talking about Pennsylvania  
11 now, besides -- I don't want to go into the other  
12 states --  
13 A. Correct, specifically for Pennsylvania.  
14 I had -- I had about 175 affidavits that I was  
15 working on just in Michigan, and I remember  
16 thinking that Pennsylvania was about twice as much  
17 as what I had in Michigan.  
18 So it was -- it was a lot.  
19 MR. LEVENTHAL: I have no more  
20 questions, Mr. Chair.  
21 MR. FOX: No questions.  
22 CHAIRMAN BERNIUS: Any questions for

Page 802

1 the panel?  
2 Mr. Brozost?  
3 MR. BROZOST: Ms. Bobb, I just have one  
4 question.  
5 You were in that conference room in --  
6 in Arlington. Were there discussions of  
7 coordinating cases across the nation for, you  
8 know, a grand multi-jurisdictional scheme?  
9 THE WITNESS: Not that I was aware of.  
10 I mean, I was working very specifically with  
11 Michigan counsel, with Arizona counsel, and then  
12 eventually with New Mexico counsel, and I never  
13 coordinated anything like that. I didn't hear  
14 about that. But again, I wasn't -- you know, I  
15 was only working on what I was working on, so if  
16 there was something, you know, maybe I just didn't  
17 know about it. But my cases were very specific on  
18 the specific cases.  
19 MR. BROZOST: Thank you.  
20 CHAIRMAN BERNIUS: Anything else, Mr.  
21 Brozost?  
22 MR. BROZOST: No.

Page 803

1 CHAIRMAN BERNIUS: Ms. Bobb, your  
2 responsibilities did not include Pennsylvania,  
3 correct?  
4 THE WITNESS: That's correct.  
5 CHAIRMAN BERNIUS: And -- but you said  
6 that there were a number of affidavits and  
7 declarations concerning Pennsylvania?  
8 THE WITNESS: Yes. I was aware of  
9 that.  
10 Like I said, I mean, we were all in the  
11 same room, sitting at the same table. So even  
12 though I was working on other states, there was  
13 literally someone sitting right next to me who  
14 would have been working on Pennsylvania. So, I  
15 mean, we all knew what everybody else was doing.  
16 CHAIRMAN BERNIUS: Did you read any of  
17 those documents?  
18 THE WITNESS: From Pennsylvania, I did  
19 not.  
20 CHAIRMAN BERNIUS: Anything else from  
21 the parties?  
22 MR. FOX: Not from me.

Page 804

1 CHAIRMAN BERNIUS: Thank you, Ms. Bobb.  
2 Anything else, Mr. Leventhal?  
3 MR. LEVENTHAL: No. I'd like to thank  
4 Ms. Bobb, though.  
5 THE WITNESS: Thank you very much.  
6 CHAIRMAN BERNIUS: You're excused, Ms.  
7 Bobb.  
8 THE WITNESS: Thank you.  
9 (Witness is excused.)  
10 CHAIRMAN BERNIUS: The next witness is  
11 whom?  
12 MR. LEVENTHAL: The next witness is Mr.  
13 Kerik, and he might be a little long -- long.  
14 Maybe we want to do that after lunch, your Honor.  
15 CHAIRMAN BERNIUS: Okay. Let's say  
16 1:30.  
17 MR. LEVENTHAL: Thank you.  
18 CHAIRMAN BERNIUS: Now before we  
19 adjourn, what other witnesses besides Mr. Kerik?  
20 THE WITNESS: Just Mr. Giuliani, and  
21 Mr. Kamins will be questioning him.  
22 CHAIRMAN BERNIUS: Okay. So I -- in my

Page 805

1 optimistic view of the world, we're going to wrap  
2 up testimony today?  
3 MR. LEVENTHAL: I like your optimism,  
4 Mr. Chair.  
5 CHAIRMAN BERNIUS: And under those  
6 circumstances, my -- my expectation is that we  
7 will finish testimony today, hopefully, and then  
8 tomorrow we will have summations on the -- on the  
9 proof of the violations.  
10 And Mr. Fox is familiar with -- with  
11 the approach that I have used in the past.  
12 Respondents be aware or ready for questions, not  
13 just a -- a summation but a -- questions directed  
14 to the issues in the -- in the Specification of  
15 Charges.  
16 MR. LEVENTHAL: Sure, and Mr. Chair,  
17 I'll be able to -- I -- I prepared -- remember I  
18 said, stated earlier I'm going to go deep dive  
19 into the law? I've prepared a -- a comprehensive  
20 statement on the law. I'd like to be able to read  
21 it into the record.  
22 CHAIRMAN BERNIUS: Well, if you're

Page 806

1 going to read it, I'm not sure that it passes the  
2 bar, but you can talk about that on the --  
3 MR. LEVENTHAL: Then you can ask me any  
4 questions you'd like about it.  
5 CHAIRMAN BERNIUS: It is -- it is --  
6 you know, you will have the opportunity to file a  
7 suggested -- a requested findings of fact and  
8 conclusions of law, and that's really the time  
9 that -- that you have -- that's really when you  
10 get the chance to -- to quote your law.  
11 You can talk about it in the -- in the  
12 summation, but I'm not sure that, at that point,  
13 it's -- it's all that helpful.  
14 MR. LEVENTHAL: But isn't the findings  
15 of fact and conclusion of law after you've made  
16 your preliminary recommendation?  
17 CHAIRMAN BERNIUS: Yes, and I will  
18 be --  
19 MR. LEVENTHAL: Well, that's why I want  
20 to get it in before you make your preliminary  
21 recommendation.  
22 CHAIRMAN BERNIUS: The discussion --

Page 807

1 the discussion is -- okay. We'll see. Let's --  
2 let's just play things out.  
3 Mr. Fox?  
4 MR. FOX: Yeah, just one thing. And, I  
5 don't know for sure, but depending on what exactly  
6 Mr. Kerik says, we may have one rebuttal witness.  
7 I just want to make that clear.  
8 CHAIRMAN BERNIUS: Okay, okay. And  
9 like I said, the -- you should be ready -- again,  
10 I'm -- I'm just anticipating, but you should be  
11 ready if we were to make a finding, preliminary  
12 finding, that mitigation and aggravation evidence  
13 would be admitted. We -- we'd go right into that  
14 next stage.  
15 But I think we want to -- we want to  
16 have this -- this summation before we make a  
17 preliminary finding. I may change my mind on  
18 that, but that's my -- that's my guess right now.  
19 MR. LEVENTHAL: And I'd like to do  
20 that. I would implore, Mr. Chair, let me make  
21 that summation, because I think it -- it might  
22 influence your preliminary finding.

Page 808

1 CHAIRMAN BERNIUS: We'll -- we'll  
2 resume at 1:30. Thank you very much.  
3 MR. LEVENTHAL: Thank you.  
4 MS. BORAZZAS: Opening up the breakout  
5 rooms now.  
6 (Whereupon at 12:14 p.m. a luncheon  
7 recess was taken.)  
8  
9  
10  
11  
12  
13  
14  
15  
16  
17  
18  
19  
20  
21  
22

Page 809

1 A F T E R N O O N S E S S I O N  
2 (Whereupon at 1:30 p.m. the hearing  
3 resumed.)  
4 CHAIRMAN BERNIUS: Okay, are we ready  
5 to resume, Mr. Leventhal? We're not -- you're on  
6 mute.  
7 MR. LEVENTHAL: Okay. Can I be heard  
8 now?  
9 CHAIRMAN BERNIUS: Are we ready to  
10 proceed?  
11 MR. LEVENTHAL: Yes, we are.  
12 CHAIRMAN BERNIUS: Call your next  
13 witness.  
14 MR. HORRELL: We may be missing Mr.  
15 Fox.  
16 CHAIRMAN BERNIUS: Good point.  
17 MS. BORAZZAS: Looks like his camera's  
18 just turned off.  
19 (Discussion off the record.)  
20 CHAIRMAN BERNIUS: Mr. Leventhal, call  
21 your next witness, please.  
22 CHAIRMAN BERNIUS: Okay, could we let

Page 810

1 Mr. Kerik in, please.  
2 MS. BORAZZAS: Yes, letting him in now.  
3 (Bernard Kerik on the witness stand.)  
4 CHAIRMAN BERNIUS: Mr. Kerik, can you  
5 hear us?  
6 THE WITNESS: Yes, I can.  
7 CHAIRMAN BERNIUS: Do you solemnly  
8 swear or affirm that the testimony you will give  
9 in this proceeding will be the truth, the whole  
10 truth and nothing but the truth, so help you god?  
11 THE WITNESS: I do.  
12 CHAIRMAN BERNIUS: You may proceed, Mr.  
13 Leventhal.  
14 DIRECT EXAMINATION  
15 ON BEHALF OF RESPONDENT  
16 BY MR. LEVENTHAL:  
17 Q. Please state your name for record, Mr.  
18 Kerik.  
19 A. Bernard Kerik.  
20 Q. Mr. Kerik, what is your employment now?  
21 A. I'm retired from the New York City  
22 Police Department and I have a private consulting

Page 811

1 group called the Kerik Group, LLC.  
2 Q. And what's your position in the Kerik  
3 Group?  
4 A. CEO.  
5 Q. And what type of consulting do you do?  
6 A. Various security, national security,  
7 legal assistance, criminal justice consultancy,  
8 things like that.  
9 Q. And are you free to divulge what type  
10 of work that you've done in this -- in this area,  
11 for your -- presently or in the last -- in the  
12 recent past?  
13 A. Yeah, some, yeah.  
14 Q. Could you -- could you -- could you say  
15 it for the panel.  
16 A. I have -- I've worked for -- for about  
17 five years for His Majesty the King of Jordan as a  
18 national security advisor. I -- I built Jordan's  
19 super maximum security prison that holds the  
20 Al-Qaeda operative, so the Committee of the King  
21 of Jordan and from around the region. I also  
22 created their National Security Crisis Management

Page 812

1 Center.  
2 I've done assessments for the Sheikh of  
3 Dubai in the Emirates. I've worked in  
4 Trinidad-Tobago. I've worked in Guyana. I've  
5 worked on a number of criminal justice campaigns  
6 and been an advisor in a number of political  
7 campaigns.  
8 Primarily focused on criminal justice,  
9 prison reform, criminal justice reform, things of  
10 that nature.  
11 Q. And could you give us some of your --  
12 your prior employment.  
13 A. I was the -- I was the Interior  
14 Minister of the Interior of Iraq under the Bush  
15 administration, overseeing all the national  
16 security elements for the Government of Iraq,  
17 following the fall of Saddam. Prior to that I was  
18 the police commissioner of the New York City  
19 Police Department. I was the commissioner on --  
20 on and in the aftermath of September 11th. I -- I  
21 ran Riker's Island in the New York City jail  
22 system for six years.

Page 813

1 Q. In what capacity? In what capacity?  
2 A. I was the chief of staff elevated to  
3 the first deputy commissioner, elevated to  
4 commissioner. That was over a six-year period.  
5 Prior to that -- I mean, to shorten it  
6 up, I've been a cop, a correction officer, a  
7 detective, a warden. I was assigned to the New  
8 York Drug Enforcement Task Force with the DEA for  
9 close to five years I think.  
10 Q. All right. And -- and in doing such,  
11 did you receive any awards in the course of this  
12 employment?  
13 A. Awards?  
14 Q. Yes, awards or recognition.  
15 A. Yes.  
16 Q. In your service to the country and for  
17 public and heroic service, could you mention those  
18 awards, please.  
19 A. I earned the Medal of Valor from the  
20 NYPD for a gun battle in which I saved my partner,  
21 who had been shot. I think five commendations, 10  
22 meritorious police duty, 13 exceptional police

Page 814

1 duty. I received the medal of -- the U.S.  
2 Presidential Accommodation from President Reagan  
3 for heroism; Ellis Island Medal of Honor. I've  
4 been knighted, honored by the Queen of England for  
5 my service to the country in the aftermath of  
6 9/11, and -- and a number of things like that, you  
7 know, regarding heroic acts during my career.  
8 Q. Did there come a time when you were  
9 nominated for Secretary of Homeland Security?  
10 A. Yes, sir.  
11 Q. And what year was that?  
12 A. That was in December 2004.  
13 Q. And who was the president at that time?  
14 A. President George Bush.  
15 Q. And at that time did you withdraw your  
16 name from consideration?  
17 A. I did.  
18 Q. And why was that?  
19 A. I had a nanny, a domestic servant, that  
20 my wife and I paid cash to over about an  
21 eighteen-month to two-year period between 2002 and  
22 2004. That came to light -- well, actually it

Page 815

1 didn't come to light. I brought it to light. And  
2 as a result I withdraw my name from consideration.  
3 Q. And did you -- were you charged for  
4 this?  
5 A. There was -- as a result of my  
6 withdrawal -- the withdrawal, there was a -- there  
7 was about a two-year state investigation by the  
8 Bronx District Attorney's office. It was a grand  
9 jury investigation that lasted about two years.  
10 In that grand jury investigation they -- they  
11 fined me -- I received a fine for two ethics  
12 violations. At the conclusion of that, I was then  
13 investigated by the Justice Department. As a  
14 result of that investigation that all started with  
15 this nanny thing, I was -- I was then indicted in  
16 2007 I think for some of the same conduct that I  
17 was charged with statewide, from the state, and I  
18 eventually pled guilty to eight criminal counts in  
19 2009 I think.  
20 Q. And you surrendered. Is that correct?  
21 A. Yes, sir.  
22 Q. And you -- you were -- how long were

Page 816

1 you in prison?  
2 A. I was sentenced to 48 months. I served  
3 three years and 11 days.  
4 Q. And after your release, were you  
5 given -- did President Trump give you anything?  
6 A. Yes. Ten years to the day I believe it  
7 was, February 18th, 2020 -- I was sentenced in the  
8 case on February 18th, 2010. On February 18th,  
9 2020 I was granted presidential clemency.  
10 Q. Okay. Now was that a pardon?  
11 A. Yes, sir.  
12 Q. All right. Now after your release from  
13 prison did you -- were you called upon by the  
14 government to help them in any way?  
15 A. Yeah. In -- I think I was released  
16 in -- my initial release was in May of 2013.  
17 Between May and December of 2013 I -- I had  
18 contact -- I was contacted by the U.S. Government  
19 Accountability Office and they requested me to  
20 come to Washington, DC to meet with them to speak  
21 to their nationwide directors on criminal justice  
22 and prison reform and to give them my insights on

Page 817

1 and fraud, waste and abuse within the federal  
2 prison system.  
3 I went to Washington. I briefed them  
4 for about six hours on my findings or at least  
5 what I thought I -- I -- I witnessed while in the  
6 system.  
7 Q. Did you testify --  
8 A. I was also --  
9 Q. Did you ever testify before any Senate  
10 or House committees?  
11 A. Yes, on -- on several occasions, both  
12 during the Obama administration and the Trump  
13 administration, I was called upon to testify in  
14 various -- in various positions on criminal  
15 justice and prison reform, from both sides of the  
16 aisle, democrats and republicans.  
17 Q. And were some of your -- some of the  
18 topics, were they sentencing reform, mass  
19 incarceration, et cetera, solitary confinement?  
20 A. Yes, sir. All of those and -- and  
21 more. But the primaries was pertaining to my  
22 views on -- on mass incarceration, on solitary

Page 818

1 confinement, the use of solitary confinement and  
2 things of that nature.  
3 Q. And did you found any organizations  
4 during this time?  
5 A. Yeah. There was an association that me  
6 and some others put together that basically I  
7 wanted to address some of these issues. I forget  
8 the name of it. It was back in '14 I think.  
9 Q. Could I refresh your memory?  
10 MR. LEVENTHAL: May I refresh his  
11 memory, Mr. Chair?  
12 MR. FOX: I have no objection.  
13 BY MR. LEVENTHAL:  
14 Q. Was it law enforcement --  
15 CHAIRMAN BERNIUS: Yes.  
16 BY MR. LEVENTHAL:  
17 Q. Was it Law Enforcement Leaders to  
18 Reduce Crime and Incarceration?  
19 A. Well, that was one, yes. That was one,  
20 and that consisted of federal agents -- that  
21 consisted of federal agents, correction officials,  
22 U.S. officials and U.S. prosecutors from armed the

Page 819

1 country, and that was looking at criminal justice  
2 reform and making recommendations to the White  
3 House at the time and the -- and the house  
4 committees on -- on criminal justice imprisonment.  
5 Q. And in -- in 2015 did you publish a  
6 book?  
7 A. Yes, I did.  
8 Q. And was that your first book or your  
9 second book?  
10 A. No, that was my second book.  
11 Q. And what was this called?  
12 A. From Jailer to Jailed.  
13 Q. And did it have a subtitle?  
14 A. You're going to have to refresh my --  
15 Q. Was it My Journey From Police and  
16 Corrections Commissioner to Inmate?  
17 A. Yes.  
18 Q. All right. Now what is your  
19 involvement now at this point on the war on terror  
20 and -- and the nation's military and state law  
21 enforcement on the war on terror?  
22 A. Well, since the aftermath of -- of

1 September 11th, I've been an avid supporter of the  
2 war on terror. You know, I -- I think a lot of  
3 people don't realize this. I lived in or worked  
4 in the Middle East for close to 11 years, I think,  
5 and I've worked at positions there where I -- I  
6 have a pretty good understanding of the -- the  
7 radical Islamic views of America and why we were  
8 attacked prior to September 11th, and what those  
9 threats are today. So I'm in contact with a  
10 number of -- a number of the agencies, a number of  
11 law enforcement agencies to which I -- I consult  
12 or advise or give them my insight. And I was also  
13 on the International Association of Police  
14 Terrorism Committee years ago with regard to the  
15 same thing.

16 Q. Okay. And Mr. Kerik, how did you come  
17 into the Trump 2020 campaign? How did you become  
18 involved?

19 A. I was a supporter of President Trump,  
20 you know, from the time he announced. I've known  
21 him since, I don't know, in 19- 1992 or 1994.  
22 I've known him a long time. I got to know him

1 when I was -- when I worked in the city. I knew  
2 him as correction commissioner, police  
3 commissioner long before he ever announced he was  
4 running for president. When he did announce, I  
5 was supportive. I campaigned for him around the  
6 country, did a number of different speaking events  
7 for him around the country and was a supporter in  
8 both campaigns.

9 Q. Did there come a time when you worked  
10 for Mr. Giuliani in regard to the Trump 2020  
11 campaign?

12 A. Yes.

13 Q. And what was your role?

14 A. In the aftermath of the election, I  
15 think on the evening of the -- on the evening of  
16 November 4th, Mayor Giuliani called me, said that  
17 he was going to be heading up a legal team to look  
18 at the election on behalf of the president and  
19 wanted me to come back to Washington, DC.

20 I had been -- I was in DC on the night  
21 of the election. I went home the morning or early  
22 afternoon of the 4th. The mayor called me I think

1 that evening, and then I took off and went back to  
2 DC the next morning to assist him in his  
3 investigation.

4 Q. And did your -- did you -- did there  
5 come a time on that date when you went to  
6 Washington that you went to the campaign  
7 headquarters in Arlington -- I think it was in  
8 Arlington, right? Am I -- or you can correct me.  
9 Was it in Arlington, Virginia?

10 A. Yeah, the -- I met the mayor first at  
11 the Mandarin Oriental Hotel that mornings, early  
12 that morning, and then we --- we left there and  
13 went to -- went to the campaign -- the Trump  
14 campaign headquarters, which was in Arlington,  
15 where the mayor -- the mayor went and met with  
16 some of the campaign attorneys and other people  
17 involved in the campaign and --

18 Q. Could you describe -- could you  
19 describe the room?

20 A. Well, there were a number of rooms but  
21 the primary room was a major -- it was a big  
22 conference room, and they probably had, I don't

1 know, I want to say 30 seats around the conference  
2 table. But that was the -- the primary room  
3 where -- where he had his meetings that morning.  
4 There were a number of offset cubicles and rooms  
5 that we later used. But that became sort of a  
6 base for the investigative team.

7 Q. And do you recall who was in it --  
8 could you describe the situation in the room, in  
9 terms of people, phone calls, et cetera, et  
10 cetera?

11 A. Yeah, I mean, we -- we just got there.  
12 We were -- the campaign people were -- the  
13 campaign people that were there was basically  
14 collecting data on the election, and it was kind  
15 of chaotic when we arrived. They were looking at  
16 the election results in a number of different  
17 states, primarily Georgia, Pennsylvania, Michigan,  
18 Wisconsin, Arizona, a few others. But those were  
19 the primary states.

20 There were a number of people that were  
21 there when I got there, physically got there, and  
22 campaign people, some of which I didn't know and

Page 824

1 still don't know. But it was -- it was pretty  
2 crazy.  
3 Q. Do you -- do you recall who -- I -- I  
4 know -- I know you weren't involved in the  
5 litigation strategy. What was your role actually?  
6 A. Basically my role was the primary  
7 investigator and coordinator for the mayor. The  
8 mayor was overseeing the -- overseeing the  
9 investigation or litigation prep, if you will and,  
10 you know, my job was to assist him, coordinate for  
11 him, with him, and I was -- I was -- I don't know,  
12 I can't think of another word other than like an  
13 intake agent for the mayor. Because we had -- we  
14 had -- we had documents coming in. People were  
15 sending information in from various states, they  
16 were sending information in from the -- the White  
17 House, perhaps, information was coming into the  
18 campaign. There was a bunch going on and, you  
19 know, this was really, as I've explained it in the  
20 past, this was sort of an understaffed legal team  
21 with an enormous task.  
22 So I was -- I was sort of the mayor's

Page 825

1 primary coordinator and investigator.  
2 Q. And you were not the only person  
3 funneling information to the mayor, but you -- you  
4 were one of the people and -- and one of the main  
5 people funneling.  
6 Would that be fair to say?  
7 A. Yes, sir.  
8 MR. LEVENTHAL: And -- could you get  
9 those exhibits up there now.  
10 We're going to put up some exhibits  
11 that -- Exhibits 40 -- what was 39? Give me one  
12 second.  
13 (Brief pause.)  
14 BY MR. LEVENTHAL:  
15 Q. Exhibit 40, 41, 42 and 43. Let's start  
16 with 40.  
17 Are you familiar -- did -- did there  
18 come a time that you had provided -- I don't want  
19 to testify. You -- you had given us these  
20 exhibits: 40, 41, 42 and 43?  
21 MR. LEVENTHAL: Could you show him  
22 each -- each one.

Page 826

1 BY MR. LEVENTHAL:  
2 Q. Have you had a chance to look at the  
3 headings of all those three?  
4 A. Yeah, I can't see the exhibits. I just  
5 see the opening page. Okay, now I see them. I  
6 see what you're looking at.  
7 Q. This is 43. We'll show you -- oh, this  
8 is 40? Okay. This is 40.  
9 A. I think -- yeah, I think these are the  
10 documents that I gave.  
11 MR. LEVENTHAL: All right show him 41.  
12 Could you show 42, please; 43, please.  
13 BY MR. LEVENTHAL:  
14 Q. Did there come a time when these  
15 exhibits came into your possession?  
16 A. Yes.  
17 Q. And was that before or after -- do  
18 you -- do you know when you got them?  
19 MR. LEVENTHAL: I withdraw my -- the  
20 first clause.  
21 BY MR. LEVENTHAL:  
22 Q. Do you know when you received these

Page 827

1 exhibits?  
2 A. No, I can't -- I can't say the exact  
3 date. It was early on in the investigation or the  
4 inquiry we were conducted. Like I said, keep in  
5 mind --  
6 Q. Had you seen -- had you seen them  
7 before or after November 15th or 16th?  
8 A. No. I think it would have been before  
9 that.  
10 Q. Okay.  
11 MR. LEVENTHAL: I move these exhibits  
12 into evidence -- oh, not yet, not yet.  
13 BY MR. LEVENTHAL:  
14 Q. Can you -- can you swear that all these  
15 information in these exhibits are true?  
16 A. Are true?  
17 Q. Yeah.  
18 A. No. No, I cannot.  
19 Q. So the contents of them you can't  
20 verify, but this is the information that was  
21 collected by the team.  
22 Is that what you're saying?

1 A. Yes. Keep in mind, we -- as I -- I  
2 tried to explain earlier, and I'm -- I know I'm  
3 doing a disservice to this explanation, but we had  
4 documents that were coming in from probably 50 to  
5 a hundred different sources. We had investigators  
6 in different states; we had our own investigators;  
7 we had technical people; we had other lawyers; we  
8 had lawyers on site that were in these different  
9 states.

10 This material was coming in from, I  
11 don't know, like a lot of different people. So  
12 when that material would come in, I would look at  
13 it. If it was something that was related to a --  
14 a part of the litigation that the mayor may have  
15 been working on or something that he needed, I  
16 would get it to him directly.

17 You know, the mayor had -- not a lot of  
18 people had access to the mayor's email address, so  
19 most of the stuff that was emailed to the mayor  
20 came to my email or came through me, or it was  
21 handed to me. If I thought it was important for  
22 the mayor to see it, personally, I would give it

1 to him. If I thought it was something he was  
2 working on, I would refer it to him and then get  
3 him what we got.

4 I can't -- I couldn't swear to the  
5 accuracy of the information. It came from other  
6 people. And we were in the process at the time of  
7 investigating and confirming details.

8 So, could I swear to the accuracy?  
9 No, I can't.

10 Q. Okay. So you had mentioned -- well,  
11 let me ask you, did you collect any raw data for  
12 the campaign?

13 A. Yeah, we did. We collected a -- a  
14 bunch of raw data early on, I mean, within the  
15 first few days.

16 Q. Hold on, hold on, hold on. Maybe I  
17 should give a foundation.

18 MR. LEVENTHAL: Could you go to Exhibit  
19 43, please.

20 BY MR. LEVENTHAL:

21 Q. Do you see that one, Mr. Kerik?

22 A. Yes.

1 Q. All right. Could you tell us how  
2 this -- this came about?

3 A. Could you scroll up. I can't see --  
4 oh, okay.

5 MR. LEVENTHAL: Can you make it a  
6 little bigger, too, please, so he can read it a  
7 little better.

8 THE WITNESS: Yeah, I got it, I got it.  
9 Okay, I got it.

10 Yeah, this -- this document, this isn't  
11 the only document. There was a bunch of documents  
12 like this that came from investigators that was  
13 collecting raw data from both Pennsylvania and  
14 Georgia, and -- and that data was coming primarily  
15 off the secretary of state's website, and the --  
16 what the investigators were doing is they were  
17 locating, in this case, people that had voted in  
18 multi states -- in Pennsylvania and Georgia -- and  
19 that -- that part of the investigation was sort of  
20 ongoing.

21 There was other data collected in  
22 the -- from the same website that basically had a

1 bunch of improprieties or -- or -- improprieties I  
2 would imagine, where, you know, so many ballots  
3 went out, yet more ballots came in than went out;  
4 when they came in versus when they came back.  
5 There were 20 different inconsistencies with  
6 regard to the material that we were collecting,  
7 and at some point we made an inquiry to the  
8 secretary of state's office for more access to  
9 that raw data --

10 Q. If I may -- excuse me, if I can  
11 interrupt you. What secretary of state's office?

12 A. Pennsylvania.

13 Q. And -- and you said there was  
14 investigation between Pennsylvania and Georgia?

15 A. Yeah, we were collecting data from  
16 both.

17 Q. Okay. And -- and did there come a time  
18 when you had to stop that?

19 A. Yeah. Well we -- yeah, there --

20 Q. Why? Why?

21 A. Because the -- the secretary of state,  
22 when we started making inquiries about the data

Page 832

1 that they had online and the data we were trying  
2 to get access to, they shut down their website,  
3 their public website. They took all that data  
4 offline. And some of it involved this, and a lot  
5 of it involved the raw data of -- of voters:  
6 ballots, dates, times, things like that.  
7 Q. Did -- did you -- did you also contact  
8 the Georgia Secretary of State or just  
9 Pennsylvania?  
10 A. No, I think -- I think Georgia too.  
11 Q. And could you tell us which site went  
12 down first?  
13 A. Pennsylvania. Pennsylvania was the  
14 first to go down.  
15 Q. No, which site went down first? That's  
16 what I asked you.  
17 A. Pennsylvania.  
18 MR. LEVENTHAL: Okay. Give me one  
19 second -- give me one second, Mr. Chair.  
20 BY MR. LEVENTHAL:  
21 Q. Oh, when you went into Pennsylvania,  
22 who were the attorneys in the -- in the office

Page 833

1 that you recall?  
2 A. For us?  
3 Q. Yeah.  
4 A. On the -- on the --  
5 Q. No, no, I mean, not Pennsylvania, into  
6 Arlington. You were never -- you didn't go to  
7 Pennsylvania, did you?  
8 A. I went to a press conference in  
9 Pennsylvania on the -- I think on the 7th --  
10 Q. You weren't -- you weren't on the  
11 ground in Pennsylvania. Is that correct?  
12 A. I was on the ground in Philly, yes,  
13 on -- on November 7th I think --  
14 Q. And --  
15 A. With the mayor.  
16 Q. Okay. But when you were in Arlington,  
17 who were the attorneys in Arlington who -- if you  
18 recall, who were working on Pennsylvania?  
19 A. You had the mayor, Joe diGenova,  
20 Victoria Toensing, Boris Epshteyn, Katherine  
21 Friess, Bobb -- I forget her -- a female woman --  
22 Christina Bobb, and there may be one or two more.

Page 834

1 Those are the primary --  
2 Q. Was Boris -- was Boris Epshteyn there?  
3 A. Yes, he was.  
4 Q. And -- okay, and just one thing. Were  
5 you involved in the First Step Act getting passed  
6 by President Obama?  
7 A. Yes. The First Step Act was  
8 actually -- it was, it was passed and signed by --  
9 by President Trump but I -- yes, I had been  
10 working on the First Step Act and things of that  
11 nature under -- under the Obama administration. I  
12 had been to the White House I think two or three  
13 times and been working with the -- the counsel for  
14 the democratic judiciary for about two years prior  
15 to Trump getting elected, and then I continued  
16 those efforts with Jared Kushner's office until  
17 the First Step Act was signed.  
18 Q. Are you familiar with Jenna Ellis?  
19 A. Yes. Oh, she was there. She was with  
20 us at -- at the campaign headquarters.  
21 Q. Okay. What is the First Step Act, and  
22 then I think that's my last question to you?

Page 835

1 A. The First Step Act is a -- a number of  
2 incentivized inmate programs for the federal  
3 prison system that would give federal prisoners  
4 incentivized programs where they could reduce  
5 their sentence if they got -- if they committed to  
6 and completed certain programs that would help  
7 them get jobs and education on the outside.  
8 MR. LEVENTHAL: Mr. Chair, at this time  
9 I'd like to move into evidence those -- those  
10 exhibits, please.  
11 CHAIRMAN BERNIUS: Mr. Fox?  
12 MR. FOX: I object. There are a number  
13 of things. First of all, I didn't hear any  
14 explanation -- I heard a little bit of an  
15 explanation that "they" got the secretary of  
16 state's office. It wasn't clear to me who the  
17 actual human beings were that did that, what the  
18 database was that they got from the secretary of  
19 state's office, and indeed -- or -- or when that  
20 was done. And that -- that's the first thing.  
21 The second -- and that only pertains to the fourth  
22 exhibit, which is Exhibit 43.

Page 836

1 With respect to the first three  
2 exhibits, I haven't heard any testimony --  
3 MR. LEVENTHAL: I couldn't hear you.  
4 I'm sorry. I couldn't hear you.  
5 MR. FOX: With respect to the first  
6 three exhibits, I haven't heard any testimony as  
7 to who compiled this information, where it was  
8 compiled from. Mr. Kerik candidly admits that he  
9 doesn't vouch for the credibility of it. And --  
10 and I don't see what it relates to in this issue.  
11 It's a list of names and addresses.  
12 So, yes, I object.  
13 CHAIRMAN BERNIUS: Mr. Leventhal?  
14 BY MR. LEVENTHAL:  
15 Q. Mr. Kerik, can you --  
16 MR. LEVENTHAL: Go back to those  
17 exhibits now, please.  
18 MR. LEVENTHAL:  
19 Q. Mr. Kerik.  
20 A. Yes.  
21 Q. This exhibit is entitled "People Who  
22 Voted Over 112 Years Old". Is that correct?

Page 837

1 A. Yes.  
2 MR. LEVENTHAL: All right. Go -- go --  
3 go to the first page, please. Make it bigger, a  
4 little bigger, please.  
5 BY MR. LEVENTHAL:  
6 Q. What does the first column say?  
7 MR. FOX: Objection. Now we're having  
8 the witness testify about an exhibit without  
9 yet -- I mean, we're dealing -- when we're dealing  
10 with the issue of authenticity.  
11 CHAIRMAN BERNIUS: Sustained.  
12 BY MR. LEVENTHAL:  
13 Q. All right. Mr. Kerik, how did you --  
14 how did you get this record?  
15 A. It came from one of the investigators  
16 in the legal team.  
17 Q. And do you know how he compiled it?  
18 A. Yeah, they -- they went into the  
19 various databases that they had -- could have  
20 access to and collected the information and then  
21 started comparing that information to other  
22 records: Social Security records, death records,

Page 838

1 things of that nature.  
2 And the one thing I can tell you,  
3 although, you know, I didn't prepare this document  
4 but I know it was adamant -- the mayor was adamant  
5 that they needed confirmation on -- you know, if  
6 we're saying somebody was dead, if -- if, you  
7 know, they -- they found that this person was dead  
8 in one category, was there a way to confirm it in  
9 another. And I remember sending back -- sending  
10 people back to go do things like that; confirm  
11 this data, make sure the data is correct.  
12 You know, we didn't make these names  
13 up. They came out of one of those databases.  
14 Q. And is this absent, only absentee  
15 ballots or mail-in ballots?  
16 A. This was requested mail-in ballots.  
17 Q. Okay. And why couldn't you do the same  
18 for same-day or early voting in person?  
19 A. Well, early --  
20 CHAIRMAN BERNIUS: Mr. -- Mr.  
21 Leventhal, I'd appreciate if you could address  
22 your questions to this particular exhibit and then

Page 839

1 I will allow Mr. Fox an abbreviated voir dire on  
2 this exhibit before I make a decision on its  
3 admissibility.  
4 BY MR. LEVENTHAL:  
5 Q. Yeah, anything further you want to say  
6 how this list was compiled or received, Mr. Kerik?  
7 A. No, not other than I've said: it came  
8 from one the investigators.  
9 CHAIRMAN BERNIUS: Mr. Fox, do you wish  
10 to voir dire?  
11 MR. FOX: Yes, briefly.  
12 VOIR DIRE BY MR. FOX:  
13 Q. What was the name of the investigator?  
14 A. I can't -- I have no idea. There were  
15 a number of them.  
16 Q. What database did you consult?  
17 CHAIRMAN BERNIUS: Are you frozen, Mr.  
18 Fox?  
19 MR. FOX: No, I said what database did  
20 he consult.  
21 THE WITNESS: The database was the  
22 secretary of state's office, I believe, from

Page 840

1 Pennsylvania.  
2 BY MR. FOX:  
3 Q. And so the secretary -- the secretary  
4 of state's office had this list of -- of mail-in  
5 voters?  
6 A. That's what I believe, yes.  
7 Q. And it had their dates of birth?  
8 A. I believe so.  
9 Q. And this was a database that was  
10 available to the public?  
11 A. It was -- it may have been on their  
12 public database or it may have been another --  
13 there may have been another one these guys --  
14 these guys acquired it from them, but that's where  
15 they would have to get it.  
16 Q. Okay, and you testified a moment ago  
17 that Mr. Giuliani insisted that this be accurate,  
18 correct?  
19 A. Oh, yeah. Yeah, yeah, yeah.  
20 Q. So what effort -- what efforts were  
21 made to verify that these individuals were born on  
22 the dates that were shown on these lists?

Page 841

1 A. I think what they -- what they did is  
2 they took the list that they had and then they  
3 went to corresponding lists. And I say this  
4 because I remember Social Security and death --  
5 death certificates being mentioned at the time,  
6 how they would confirm some of this stuff. So I  
7 think that's what they were doing.  
8 Q. So there's a -- you have a -- a  
9 database where you could get people's Social  
10 Security numbers?  
11 A. I -- I don't know what they were doing  
12 at the time, but that was one of the  
13 conversations, or how they were doing it.  
14 Q. What's the name of the database where  
15 you didn't somebody's Social Security numbers?  
16 A. I have no idea.  
17 Q. So do you know anything at all about  
18 this, other than that an investigator told you  
19 that he got this information from the secretary  
20 of -- a database that the Secretary of State had?  
21 A. No, not pertaining to the document.  
22 No.

Page 842

1 Q. And you don't stand behind the voracity  
2 of the information, correct?  
3 A. No. It was under investigation at the  
4 time.  
5 MR. FOX: I -- I object to the  
6 admissibility of the exhibit -- this document.  
7 CHAIRMAN BERNIUS: Sustained at --  
8 sustained at this time.  
9 MR. LEVENTHAL: Well, then this should  
10 be admitted for the state of mind of Mr. Giuliani  
11 having these records.  
12 CHAIRMAN BERNIUS: Well, you can tie  
13 that up when he testifies.  
14 MR. LEVENTHAL: Okay. Can we go to the  
15 next one, please. Can you make it a little  
16 bigger.  
17 CONTINUED DIRECT EXAMINATION  
18 ON BEHALF OF RESPONDENT  
19 BY MR. LEVENTHAL:  
20 Q. Mr. Kerik, do you see this one?  
21 A. Yes.  
22 Q. Were did you receive this exhibit?

Page 843

1 A. It would have been around the same  
2 time. And the thing I notice on here, the third  
3 line, defined by the Social Security death index,  
4 which is probably what Mr. Fox was just asking me,  
5 the database that he was talking about, that could  
6 be where it came from, that specific database  
7 title, you know, and this came from some of the  
8 same people.  
9 MR. LEVENTHAL: Now I move them both  
10 into evidence, Mr. Chair.  
11 CHAIRMAN BERNIUS: Mr. Fox, voir dire?  
12 VOIR DIRE BY MR. FOX:  
13 Q. I'm not sure what "both" means, but  
14 with respect to this exhibit, which I understand  
15 to be Exhibit 41, do you notice -- did you notice,  
16 Mr. Kerik, that the names on this exhibit were  
17 fairly generic names?  
18 A. Okay?  
19 Q. For example --  
20 A. Did I notice? No, I didn't notice.  
21 No. But go ahead.  
22 Q. For example, the second name is William

Page 844

1 Miller.  
2 A. Right.  
3 Q. The third name is James Williams,  
4 correct.  
5 A. Right.  
6 Q. The next name is John Nichol.  
7 A. Right.  
8 Q. Now we got Charles Brown down a few  
9 more.  
10 A. Right.  
11 Q. It -- it -- it wouldn't -- it didn't  
12 surprise you when you saw this that were probably  
13 more than one voter in Pennsylvania with those  
14 names, did it?  
15 A. Well, it wouldn't surprise me if  
16 William Miller, a William Miller, you had two  
17 living at 80 Kenrick Avenue. It would surprise me  
18 if they both had the same voter I.D. That would  
19 surprise me.  
20 Q. Did anyone check the Social Security  
21 numbers, which is the last column that's blacked  
22 out, but there are Social Security numbers on the

Page 845

1 original exhibit, correct?  
2 A. I believe there is, yes, or was, yes,  
3 before it was blocked out.  
4 Q. In fact that's the Social Security  
5 number of Joseph Grec -- the Joseph Greco who  
6 lived at 415 Second Street, Donora, Pennsylvania.  
7 Anybody check that?  
8 A. I'm sure they did.  
9 Q. Okay. You don't know that. You're  
10 sure they did?  
11 A. Right.  
12 Q. And who was it that compiled this --  
13 this document?  
14 A. Various investigators that worked for  
15 the team.  
16 Q. And -- and again, what was the source  
17 of the database?  
18 A. This would have been the  
19 Pennsylvania -- one of the -- one of the  
20 Pennsylvania -- the secretary of state's  
21 databases, I believe.  
22 MR. FOX: I continue to object. I

Page 846

1 don't think he -- this witness has sufficient  
2 knowledge --  
3 BY MR. FOX:  
4 Q. Again, you don't stand behind the  
5 voracity of this one either, right?  
6 A. No. No, I can't.  
7 CHAIRMAN BERNIUS: I continue to  
8 object.  
9 CHAIRMAN BERNIUS: Sustained at this  
10 time.  
11 MR. LEVENTHAL: All right, the next  
12 exhibit, please.  
13 CONTINUED DIRECT EXAMINATION  
14 BY MR. LEVENTHAL:  
15 Q. Mr. Kerik, do you see this exhibit?  
16 A. Yes.  
17 Q. Do you see the data sources?  
18 A. Yeah. I also see the methodology,  
19 which is -- I think would -- would answer some of  
20 Mr. Fox's questions.  
21 Q. Go ahead.  
22 A. And -- and, you know, the methodology

Page 847

1 in this -- in this case, the list was obtained  
2 searching for two active voters on FindAGrave.com  
3 as well as Tributes.com.  
4 That's some of the outside sources that  
5 they were looking at when they were going through  
6 this stuff.  
7 Q. Okay. And -- well, you see the title  
8 of this. This only mail-in ballots and absentee  
9 ballots, right? It's not same-day voting or early  
10 voting.  
11 Is that correct?  
12 A. Yes, sir.  
13 Q. And is that true of all these exhibits?  
14 A. I believe so, yes.  
15 MR. LEVENTHAL: Well, I move this  
16 exhibit in as well as 40 and 41 on the basis that  
17 these data sources are now in evidence.  
18 CHAIRMAN BERNIUS: Mr. Fox, you may  
19 voir dire.  
20 VOIR DIRE BY MR. FOX:  
21 Q. Who was it who compiled this list?  
22 A. Investigator for the team.

Page 848

1 Q. All right. And you say it came from  
2 FindAGrave.com. Do you know what FindAGrave.com  
3 is?  
4 A. It's a -- a site you could find people  
5 that have passed.  
6 Q. It's not a government website, correct?  
7 A. I don't believe so.  
8 Q. It's sort of Wikipedia for dead people,  
9 right?  
10 A. I can't say that. I don't know.  
11 Q. People go out into cemeteries and they  
12 take photographs of graves and they list them on  
13 this website?  
14 A. I don't know that --  
15 MR. LEVENTHAL: Is Mr. Fox testifying?  
16 Is Mr. Fox testifying?  
17 BY MR. FOX:  
18 Q. Is that what it is, sir?  
19 A. I don't know --  
20 MR. LEVENTHAL: Objection, objection.  
21 CHAIRMAN BERNIUS: Overruled. He's  
22 questioning the witness as to the propriety of

Page 849

1 admitting the exhibit into evidence.  
2 BY MR. FOX:  
3 Q. What about Tributes.com? Do you know  
4 what that is?  
5 A. Same type of website, I believe.  
6 Q. It's not a government website, right?  
7 A. Don't think so.  
8 Q. It's a website of -- is it a website of  
9 someone who goes to various newspapers and looks  
10 for obituaries and tributes that are published?  
11 A. No idea. I said I don't know -- I  
12 don't know their methodology, no.  
13 Q. Now, what's being recorded here are  
14 people who died before their mail-in ballots were  
15 received, correct?  
16 A. I believe so.  
17 Q. And does it show how many people died  
18 before their mail-in ballots were mailed?  
19 CHAIRMAN BERNIUS: Mr. Fox, I think  
20 you're -- you're getting into the --  
21 MR. FOX: Okay.  
22 CHAIRMAN BERNIUS: -- content of the

Page 850

1 documents.  
2 MR. FOX: All right. Then -- then  
3 I'll -- okay. I -- I continue my objection.  
4 CHAIRMAN BERNIUS: Sustained at this  
5 time.  
6 MR. LEVENTHAL: All right, let's go to  
7 the last exhibit, please.  
8 CONTINUED DIRECT EXAMINATION  
9 BY MR. LEVENTHAL:  
10 Q. Mr. Fox, could you -- I'm sorry, Mr. --  
11 not Mr. Fox. I don't want to cross-examine him,  
12 even though he was testifying.  
13 Mr. -- Mr. Kerik.  
14 A. Yes.  
15 Q. Could you tell me about this exhibit.  
16 A. This is the General Election Absentee  
17 Multistate Voters, and basically what they did,  
18 it's a list of 214,410 possible cases of the same  
19 person casting votes in Pennsylvania as well as  
20 Georgia. Every name on the list has requested,  
21 filled out and returned an absentee ballot in the  
22 2020 election.

Page 851

1 Q. And when the litigation -- did you  
2 receive this also around the same time?  
3 A. Yes.  
4 Q. And when the litigation was  
5 terminated -- before the litigation was  
6 terminated -- you -- you have similar names here,  
7 but you haven't been able to check absolutely  
8 whether the person in Pennsylvania and Georgia  
9 were exactly the same in all instances.  
10 Is that correct?  
11 A. That's correct.  
12 Q. But there were on this list 214,410  
13 possible cases, and it says "possible cases,"  
14 correct?  
15 A. Yes. Keep in -- can I talk?  
16 Q. Sure.  
17 A. Can I say something?  
18 Q. Sure.  
19 A. Keep in mind, you know, these --  
20 nothing here, nothing was conclusive when -- in  
21 these documents. These documents were coming in  
22 to us as an investigative tool for either

Page 852

1 litigation or litigation prep in looking at the  
2 problems within the election. So there was --  
3 this was all a continual investigation.  
4 The documents you see, whether it's  
5 this one or the others -- any of the ones that we  
6 provided -- I provided at least -- all those  
7 documents were collected and were part of an  
8 ongoing investigation.  
9 So, there's stuff in here that may be  
10 conclusive, or may not be, but it was all a part a  
11 of that litigation prep.  
12 Q. All right. Mr. Fox has stated, implied  
13 that someone who might have mailed in their ballot  
14 and died after they mailed it in.  
15 You heard that. Is that correct?  
16 MR. FOX: Objection. This is not --  
17 THE WITNESS: I heard, yes.  
18 MR. FOX: This is not even  
19 (indecipherable) to be about.  
20 CHAIRMAN BERNIUS: Please, rephrase  
21 your question, please.  
22

Page 853

1 BY MR. LEVENTHAL:  
2 Q. All right. Are you aware of any  
3 statute that invalidates a vote of someone who  
4 mails in a ballot and dies before Election Day?  
5 MR. FOX: Objection.  
6 THE WITNESS: To my -- to my  
7 understanding the vote does not count.  
8 CHAIRMAN BERNIUS: I'll allow it.  
9 MR. LEVENTHAL: Thank you.  
10 MR. FOX: Okay, are we voir diring on  
11 this exhibit, or what are we doing?  
12 MR. LEVENTHAL: I moving that into  
13 evidence, as well as the others. If you want to  
14 have the same ruling, you could save -- we could  
15 save some time if Mr. Fox is going to ask the same  
16 questions and we're going to have the same result.  
17 MR. FOX: I'd like to make a record,  
18 though.  
19 CHAIRMAN BERNIUS: Make a record, if  
20 you would, Mr. Fox.  
21 VOIR DIRE BY MR. FOX:  
22 Q. All right. Who was it that came up

Page 854

1 with the idea of comparing Pennsylvania and  
2 Georgia?  
3 A. I got to be honest, I don't -- I do not  
4 recall.  
5 Q. And why Georgia? Is there some -- lots  
6 of Pennsylvanians move to Georgia, or vice versa?  
7 A. Well, we found -- Pennsylvania, Georgia  
8 wasn't the only problem. We found a number of  
9 people coming into Arizona that came from  
10 California. The number --  
11 Q. But I want to talk about Georgia --  
12 MR. LEVENTHAL: Let him answer the  
13 question, please, Mr. Chair.  
14 THE WITNESS: So, you know, this was an  
15 ongoing -- this was an ongoing investigation.  
16 You know, we were looking at  
17 improprieties and voter fraud, and that's part of  
18 the investigation.  
19 Q. You were trying to find improprieties  
20 in voting -- voter fraud, right?  
21 A. Exactly.  
22 CHAIRMAN BERNIUS: Mr. Fox, could you

Page 855

1 address your questions more narrowly to the  
2 exhibit, if you would, at this point.  
3 BY MR. FOX:  
4 Q. Could you -- did you notice the generic  
5 names of the people on this exhibit, as well?  
6 A. No. I got to tell you, Mr. Fox, this  
7 is pretty insulting. What do you think, we made  
8 this stuff up?  
9 No. I didn't -- I didn't notice  
10 because this was information that we were  
11 gathering from these databases. I didn't create  
12 those names, nor did the investigators. I can  
13 assure you.  
14 Q. Well, Mr. Kerik, does it come as a  
15 great surprise to you that there might be a Robert  
16 Louis Miller that lives in Georgia and a Robert  
17 Louis Miller that lives in Pennsylvania?  
18 A. Well, that -- that would not surprise  
19 me, but would -- you know, it would also surprise  
20 me if they had the same dates of birth, or they  
21 had the same prior address, or they had some other  
22 corresponding information that the investigators

Page 856

1 may have linked to put their names on here.  
2 I'm sure they just didn't find a bunch  
3 of people in one state and said, "Oh, I got guys  
4 in another state. We're going to put them all  
5 together".  
6 Q. Well, did you -- do you see dates of  
7 birth on this exhibit?  
8 A. No.  
9 Q. Do you -- so, do you see Social  
10 Security numbers on this exhibit?  
11 A. No, I don't.  
12 Q. Anything to show, for example, that  
13 Eric James Moore in Springfield, Pennsylvania is  
14 different or the same as the Eric James Moore in  
15 Dawsontown, Georgia -- Dawsonville, Georgia?  
16 A. The specific information, no.  
17 Q. What this is is a list of voters in  
18 Georgia and Pennsylvania who had the same names,  
19 correct?  
20 A. Yes.  
21 MR. FOX: Okay. I -- I continue my  
22 objection.

Page 857

1 CHAIRMAN BERNIUS: The objection --  
2 MR. LEVENTHAL: May I -- may I cross on  
3 the voir dire --  
4 CHAIRMAN BERNIUS: The objection -- his  
5 objection is sustained at this point.  
6 MR. LEVENTHAL: All right. Well, I  
7 don't know if Mr. Kerik is going to question Mr.  
8 -- if Mr. Fox is going to question Mr. Kerik, but  
9 I have one more question for Mr. Kerik.  
10 BY MR. LEVENTHAL:  
11 Q. Mr. Kerik, at this point you were going  
12 to investigate, if given an opportunity, if these  
13 people were the same people.  
14 Is that correct?  
15 A. Yes.  
16 MR. LEVENTHAL: I have no further  
17 questions.  
18 CHAIRMAN BERNIUS: Mr. Fox.  
19 MR. FOX: No questions.  
20 CHAIRMAN BERNIUS: I'm sorry?  
21 MR. FOX: No questions, no additional  
22 questions.

Page 858

1 CHAIRMAN BERNIUS: Thank you.  
2 Does anybody on the panel have  
3 questions?  
4 MS. HAYNESWORTH-MURRELL: No.  
5 CHAIRMAN BERNIUS: The panel has no  
6 questions. Thank you very much, Mr Kerik, you're  
7 excused.  
8 THE WITNESS: Thank you, Mr. Chairman.  
9 (Witness is excused.)  
10 CHAIRMAN BERNIUS: Mr. Leventhal, call  
11 your next witness, please.  
12 MR. LEVENTHAL: Before we do, your  
13 Honor, can I just ask Mr. Fox one question...  
14 Are you going to call a rebuttal  
15 witness? I just want to know the -- no.  
16 MR. FOX: None.  
17 MR. LEVENTHAL: That's what I thought.  
18 Okay, thank you.  
19 I just want to get a time frame, your  
20 Honor.  
21 MR. KAMINS: Mr. Chair, we call Mr.  
22 Giuliani.

Page 859

1 (Rudolph Giuliani resumes the witness  
2 stand.)  
3 CHAIRMAN BERNIUS: Mr. Giuliani, I  
4 remind you you are still under oath.  
5 DIRECT EXAMINATION  
6 ON BEHALF OF RESPONDENT  
7 BY MR. KAMINS:  
8 Q. So, Mr. Giuliani, I'd like to go  
9 briefly into your past public service and  
10 concentrate on your service to this country as  
11 Associate Attorney General of the United States.  
12 Can you tell us what years you were in  
13 that position?  
14 A. I was Associate Attorney General from  
15 1981 to 1984.  
16 Q. And during that time could you tell us  
17 what your major duties were?  
18 A. I was the third ranking official in the  
19 Department of Justice appointed by President  
20 Ronald Reagan and confirmed by the Senate.  
21 My duties were to oversee what you  
22 would generally describe -- excuse me -- what you

1 would generally describe as the criminal division  
2 side of the Justice Department. It would be the  
3 criminal division, the '92 United States Attorneys  
4 Office, the '92 United States Marshals Offices,  
5 the Bureau of Prisons, at that time the  
6 Immigration and Naturalization Service, the Pardon  
7 Attorneys Office, the criminal division of the  
8 civil rights division, the criminal division of  
9 the tax division, the criminal division of the  
10 antitrust division, INTERPOL.

11 I was responsible for guiding the  
12 nominations -- that was -- the U.S. attorneys and  
13 U.S. marshals. So we were all individually  
14 confirmed by the United States Senate. In the  
15 first year of the administration, about 180 of  
16 them had to be confirmed.

17 I was also -- I was also in charge of a  
18 special commission that was put together by  
19 President Reagan and Attorney General William  
20 French Smith. The Attorney General's Task Force  
21 on Violent Crime that wrote a -- that wrote reform  
22 on violent crime, chaired by Professors Blakey and

1 Governor Thompson, and held hearings all over the  
2 country and formed the basis of criminal justice  
3 reform, right through the 1994 Criminal Justice  
4 Reform Bill to President Clinton got through  
5 Congress and continued to work on that into the  
6 Clinton administration.

7 There were some other --

8 Q. No, that's fine.

9 A. There was some others, but those were  
10 the -- those were the main -- the main ones.

11 Q. Okay, and did there come a time when  
12 you were the United States Attorney for the  
13 Southern District of New York?

14 A. Yes. I left being associate Attorney  
15 General, once again appointed by President Reagan  
16 and confirmed by the Senate to be United States  
17 Attorney for the Southern District of New York.

18 Q. And can you give us some highlights of  
19 your tenure there.

20 A. Well, I had been assistant U.S.  
21 attorney there for the early part of my career.  
22 It was -- it was kind of an unusual choice because

1 I asked for a reduction in rank. Associate  
2 Attorney General is technically the boss of the  
3 U.S. Attorney in the Southern District of New  
4 York, but it was the office I grew up in and it  
5 was the one office that I always wanted to serve  
6 in, because I just have a tremendous regard for  
7 it.

8 I -- well, do you want me to give you a  
9 little highlights --

10 Q. Just -- just briefly the highlights if  
11 you would.

12 A. I've litigated thousands of cases. I  
13 think the ones that people would remember the most  
14 were the Commission of the Mafia. Those are the  
15 five -- heads of the five families that operated  
16 in New York since 1931 as the head of the -- the  
17 mafia, which unusually has five families in New  
18 York, although most other cities are blessed to  
19 only have one -- or not blessed, luckily only have  
20 one, we have five. I prosecuted each one of the  
21 individual families themselves; probably  
22 prosecuted 300 or 400 members of the American,

1 Italian-American mafia. I also participated in  
2 the prosecution of 800 members of the Sicilian  
3 mafia, for which I received several awards from  
4 the Italian government.

5 I prosecuted two former Nazis, handled  
6 their extradition cases, one of them at the  
7 request specifically of President Reagan, because  
8 it was a very controversial case where there was a  
9 great deal of opposition to extraditing him by Pat  
10 Buchanan and people in the -- there was a great  
11 division of opinion in the Reagan administration  
12 about that extradition. The name of the former  
13 Nazi or Nazi, I guess, Mycofskish (phon). The  
14 other one was Linish (phon). One of them was  
15 responsible for 22,000 deaths when he was  
16 commandant of the concentration camp, the other  
17 for 12,000. I argued and handled those cases  
18 personally. U.S. attorneys usually don't handle  
19 cases personally.

20 I believe I was the last U.S. Attorney  
21 in the Southern District to actually try a case  
22 while I was U.S. Attorney, and that was a rather

1 famous case that probably had a lot to do with my  
2 being mayor, which is the racketeering case  
3 against members of the then Mayor Koch's  
4 administration, for taking multi millions of  
5 dollars in bribes for city contracts.

6 I prosecuted 60 Highway commissioners  
7 in the State of New York, about equal number of  
8 republicans and democrats. I prosecuted and  
9 convicted Congressman Biaggi. Early in my career  
10 I prosecuted Congressman Fodel (phon), convicted  
11 him.

12 I brought the racketeering case against  
13 the Teamsters Union that imposed a receivership on  
14 the Teamsters Union that removed them from  
15 organized crime, effectively removing them from  
16 Las Vegas at the same time. That was accompanied  
17 by letters from 132 members of Congress to have me  
18 removed as United States Attorney, which I was  
19 very happy President Reagan ignored, Vice  
20 President Bush condemned.

21 I prosecuted in those days a very well  
22 known financial -- well, I prosecuted a lot of

1 people on Wall Street, the most prominent ones  
2 being Ivan Boesky and Michael Milken. They're  
3 probably best known as the prototypes for the  
4 movie Wall Street.

5 I prosecuted a significant number of  
6 members of the Colombian cartels, drug cartels, as  
7 well as FARC, which is the terrorist group in  
8 Columbia.

9 I prosecuted several -- in those days  
10 Islamic high-jackers, terrorists that formed --  
11 that later became what we know -- what we came to  
12 know as ISIS and Al-Qaeda.

13 I received the Attorney General's Award  
14 several times for the most successful prosecutor,  
15 or whatever.

16 I -- I was the subject of several mafia  
17 contracts to kill me. I was the subject of a vote  
18 by the commission to kill me, which I won, three  
19 to two; meaning three people voted against killing  
20 me and two voted in favor of it. That was a  
21 matter of record that didn't come out until 20  
22 years later.

1 I was also subject of several fatwas, a  
2 threat by the FARC to slit -- slit my throat if I  
3 went to -- if I prosecuted them.

4 My family also was threatened while I  
5 was U.S. Attorney. I needed to have Marshal's  
6 protection. I declined it, actually declined it  
7 until I had a child.

8 I argued at President Reagan's request  
9 the -- the case that was brought to try to enjoin  
10 him from deploying cruise missiles. It was  
11 brought by a large number of members of Congress.  
12 And as a personal request, I argued that case,  
13 myself in the Second Circuit -- in the Second  
14 Circuit, right.

15 Q. Okay --

16 A. That --

17 Q. I'm sorry.

18 A. That's enough.

19 Q. Okay.

20 A. There were others, but...

21 Q. Thank you.

22 Mr. Giuliani, did there come a time

1 when you were elected mayor City of New York?

2 A. I left being U.S. attorney in 19 -- in  
3 early 1989, right after -- right after President  
4 Bush was -- became president, not because of that  
5 but largely because of what I went ahead and did,  
6 which was I ran for mayor that year, in 1989, and  
7 I lost in a very close election that had  
8 allegations of voter fraud, and I did not pursue  
9 them.

10 I ran again four years later and I won,  
11 and then I served as mayor of New York for eight  
12 years --

13 Q. And can you give me --

14 A. -- I was -- I was -- I practiced law.

15 I represented AT&T. I represented two large  
16 antitrust cases. I handled both civil and  
17 criminal litigation and had about five trials in  
18 that period of time. Most of the rest was, you  
19 know, civil litigation.

20 Q. And can you give us some -- briefly  
21 some highlights of your tenure as mayor during  
22 those eight years.

1 A. I was the -- I was only the third  
2 republican elected in a hundred years. I reduced  
3 crime -- reduced overall crime by 65%. I believe  
4 I reduced homicide by 70, which was thought to be  
5 impossible to do. Nobody else has ever done that  
6 before or after.

7 I -- when I -- when I became mayor,  
8 there was a 10.5% unemployment rate. If went down  
9 to five percent, I'd like to think in part because  
10 of the economic reforms that I made. I cut the  
11 budget of New York City. I produced the first  
12 surplus in 35 years for four years in a row.  
13 Thank goodness when 9/11 happened, we were sitting  
14 with a surplus rather than a city with a large  
15 hole in the budget -- a large deficit in the  
16 budget.

17 I -- I -- I established the -- the  
18 first separate Child Welfare Unit, because up  
19 until the time I was mayor, the child welfare  
20 duties were done by the Welfare Department. It  
21 got very, very little attention. It was one of  
22 things I was motivated to do, because of the death

1 of a young girl very early on when I was mayor,  
2 was to reform that. I received several awards for  
3 that because that was copied in other  
4 jurisdictions.

5 I established the first mayor's office  
6 and then set up the position of Commissioner of --  
7 of Emergency Management; did that largely because,  
8 the year that I ran for mayor, but before I was  
9 mayor, there was an Islamic terrorist attack on  
10 the World Trade Center. I had a great deal of  
11 knowledge of that because it was only three years  
12 after I myself ran the joint -- I'm sorry. I also  
13 as U.S. Attorney ran the Joint Terrorism and Task  
14 Force for the years that I was U.S. Attorney,  
15 which is a combination of the FBI and the New York  
16 City Police Department. I believe it was the  
17 first in the country. I didn't establish that.  
18 It was established by one of my predecessors as  
19 U.S. Attorney. But I enhanced it greatly when I  
20 was U.S. Attorney. And then when I was mayor, I  
21 put a lot more police officers in it and  
22 established a similar office in New York City,

1 thank goodness, you know, seven years before 9/11,  
2 so that when September 11 happened, we had a large  
3 number of well trained antiterrorism officers,  
4 which pretty much no other city had. Chicago and  
5 the State of Florida specifically copied our  
6 offices. Both Mayor Daley of Chicago and Governor  
7 Bush of Florida asked if they could have members  
8 their administration participate in the task force  
9 that Governor Pataki and I put together, and then  
10 I helped them develop their task forces.

11 I reduced the number of people on  
12 Welfare by -- from 1.1M to 500,000, of which 90%  
13 were -- were working; started a Welfare to Work  
14 program. I started a Workfare program, which  
15 required people on Welfare to work, which was  
16 largely responsible for the turnover. So, by the  
17 time we got to 2000 our Welfare rolls were, per  
18 capita, one of the lowest in the country, and our  
19 employment was one of the highest.

20 New York had traditionally always been  
21 behind the U.S. employment rate. In other words,  
22 we always had unemployment rate greater than the

1 United States. While I was mayor, for the last  
2 five years, our unemployment rate was much better  
3 than the United States. It's back to where it  
4 used to be.

5 I -- I reformed the system of selecting  
6 principals in the New York City school system.  
7 They had previously been given tenure and were  
8 allowed to stay there forever, no matter how good  
9 or bad they were. I was able to negotiate with  
10 the -- with the Principal's Union, considered to  
11 be the first change, first time any teachers union  
12 agreed to accountability. I was unable to do that  
13 with the overall Teachers Union, as my  
14 predecessors all attempted the same thing but were  
15 unable to do that. But I do think, in changing  
16 the principals, it had something to do with the  
17 improvement of the schools so that the principals  
18 who were doing a bad job could be removed; the  
19 ones who were doing a good job could get a higher  
20 salary, which is impossible with the teachers.

21 Mr. Kerik mentioned that he --  
22 mentioned that he was commissioner of the -- of

Page 872

1 the corrections department. I should -- should  
2 say that, when he began there, Riker's Island was  
3 featured on 60 Minutes as the worst, most violent  
4 jail in America. Riker's Island has been unusual.  
5 New York City puts all of its prisoners in one  
6 place, because it has a big, isolated island,  
7 called Riker's Island. You fly over it when you  
8 come into LaGuardia Airport. It traditionally has  
9 been one of the most violent in the country.  
10 Mr. Kerik and his associates there  
11 changed -- moved it from the most violent in the  
12 country to the least. They reduced violence by  
13 90%. That was documented by 60 Minutes in a -- in  
14 a piece they did in the year 1999, when they went  
15 in there to show how violent it was and found out  
16 it was a model prison. It was then used as a  
17 model for the next eight to ten years. My  
18 successor, Michael Bloomberg, improved it even  
19 more, as he did the reduction in crime, by the  
20 way. But that has since changed.  
21 And there were a lot of other.  
22 Q. Okay.

Page 873

1 A. I -- I worked 24/7 as mayor. I love  
2 New York City, as I love America, and I devoted --  
3 devoted my life to making it better than it was.  
4 I sort of subscribe to the Athenian oath that was  
5 taken by my most famous predecessor, Fiorello  
6 LaGuardia, which is that my obligations was to  
7 leave my city better than it was given to me. I  
8 think I did that.  
9 Q. Thank you.  
10 And, briefly, I know you -- over the  
11 years, you've gotten many, many awards, but were  
12 there any significant awards that you can think of  
13 that you received from heads of state or the  
14 president?  
15 A. Sure, I was -- I was knighted by -- an  
16 honorary knighthood, and I should correct Mr.  
17 Kerik because, he's a knight, he would have to  
18 lose his citizenship. You're not allowed to  
19 accept a knighthood as an American citizen because  
20 it's an honorific title barred by the  
21 Constitution, and I'm an honorary knight of the --  
22 of the king. He was also awarded that, as was my

Page 874

1 fire commissioner, Tom Von Essen, both of whom  
2 were impossible-to-describe heros.  
3 During 9/11, Mr. Kerik and I almost  
4 died. We were locked together in a room that was  
5 hit by the first tower that came down. Governor  
6 Pataki thought we were missing, had actually drawn  
7 up the order for someone to take over the city.  
8 And when I called him he was -- he was very happy  
9 that I was alive. Mr. Kerik and I helped to get  
10 all these people through that. So, I know -- I  
11 know Bernie Kerik. So when you go through  
12 something like that with a man, it creates a  
13 special kind of relationship.  
14 And -- and he -- he was a remarkable  
15 corrections commissioner; 90% reduction in  
16 violence. I used to go to Riker's Island  
17 regularly. Since my background was law  
18 enforcement, of course I paid more attention to  
19 that probably than anything else as mayor,  
20 although I did spend a great deal of time learning  
21 and memorizing the budget of New York City, so  
22 that I could --

Page 875

1 Q. Right.  
2 A. -- participate.  
3 Q. Any other major awards from the  
4 president or any --  
5 A. Yeah, I received one of the highest  
6 awards of the Government of France by Jacques  
7 Chirac, who officially named me "Rudy the Rock".  
8 Oprah Winfrey named me "America's Mayor" on her  
9 show.  
10 I -- I received the "G-Man of the Year  
11 Award" from the FBI for my lifetime achievements  
12 for the successful prosecutions with the FBI.  
13 That was about six or eight years ago.  
14 I received many other -- many other  
15 awards, a lot of them having to do with September  
16 11, which really I received because of the heroism  
17 mainly of the people that worked for me. I was  
18 very honored to guide them, but they're the ones  
19 who were the real heros.  
20 Q. Thank you.  
21 Now, Mr. Giuliani, you represented the  
22 plaintiffs in the litigation we've been

Page 876

1 discussing, Donald Trump for President vs.  
2 Boockvar, correct?  
3 A. I did.  
4 Q. How did you first become involved in  
5 your representation of the plaintiffs?  
6 A. Well, starting in March of -- I hope I  
7 get the year right. I often confuse it. I think  
8 it was 2019, I began representing President Trump  
9 as his personal lawyer in I guess what you would  
10 call the Russian Collusion investigation. That --  
11 that was the original impeachment investigation,  
12 which remained that way for quite sometime.  
13 Now -- now it's been very discredited, the Russian  
14 Collusion, but at the time it was considered to be  
15 gospel and almost treason to be denied --  
16 Q. We're going to stick to the --  
17 A. Okay. So I began representing him then  
18 along with a team of -- of four lawyers, and I was  
19 technically named the head of that team, but I  
20 always considered that Jay Sekulow and I together  
21 ran that team, but he had as much if not more to  
22 do with it than I did. And he was the

Page 877

1 historical -- he had been with -- I replaced John  
2 Dowd, who left. He had been there from the very  
3 beginning, Jay had, and I represented him through  
4 the first impeachment. And at -- and at the time  
5 of the election, I was still his lawyer, the legal  
6 advisor, so I -- although I participated very,  
7 very heavily in the first election, the 2016  
8 election -- in fact I was -- basically lived with  
9 him for five months -- in the 2020 election my  
10 participation was much less, because I was -- I  
11 was still -- I was representing him, and there was  
12 the new impeachment inquiry involving Ukraine that  
13 came about.  
14 Q. All right. So starting with the  
15 election now on November 3rd, how did you become  
16 involved in this litigation?  
17 A. Well, I mean, I basically -- it's been  
18 described. I was -- I -- I believe it was the  
19 morning after the election.  
20 Q. Mm-hmm.  
21 A. Some people think it was the next day,  
22 but I -- I believe it was the morning after the

Page 878

1 election, I -- I went over to see the president in  
2 the Oval Office. I don't exactly remember why,  
3 maybe to just talk to him, or it may have been on  
4 a legal matter, because again I was still  
5 representing him as a -- as an attorney on the --  
6 representing him on impeachment. Or it may have  
7 been just to commiserate with him, because of what  
8 happened the night before, and during that  
9 conversation, which was about other subjects as  
10 well, which I -- I think would be privileged, but  
11 unrelated to this, he asked me -- basically he  
12 asked me if I would take over the campaign, would  
13 I go over there and find out what the heck was  
14 going on and direct -- and after we discussed it  
15 back and forth, we agreed that what I would do is  
16 oversee the litigation.  
17 Q. So did you -- at some point --  
18 A. Put together -- first of all, find out  
19 what he had, what resources he had, because he had  
20 been told that they had draft complaints and they  
21 had teams in all these different states, because  
22 if you might remember about a month, a month and a

Page 879

1 half before the election, there was a big article,  
2 I think it was in the Washington Post or the New  
3 York Times, saying that the democrats had a  
4 thousand lawyers they had hired to litigate after  
5 the election and Hillary Clinton had said that Joe  
6 Biden should never concede.  
7 Q. All right, so --  
8 A. So -- so, as a result of that,  
9 President Trump told his campaign to do something  
10 similar. I was not involved in that. I'm just --  
11 I was involved in it tangentially. I was around  
12 as his lawyer and I heard it. But then on that  
13 day he said to me, "go over and find out if they  
14 did that".  
15 Q. All right, so we're talking about the  
16 4th. At some point on the 4th did you go to -- to  
17 campaign headquarters?  
18 A. I did, but I -- I must --  
19 Q. That was -- and that was in Arlington,  
20 Virginia?  
21 A. Yeah. I must have called some people,  
22 because I brought some people with me, so I must

Page 880

1 have called Joe diGenova, and his wife, and Dr.  
2 Ryan and several other people that I -- I knew I  
3 would need to help me. Because I didn't know  
4 exactly what I would be doing. I might be going  
5 back to him and saying "Everything's Fine".  
6 Q. All right. Can you describe when you  
7 were at the campaign headquarters the arrangements  
8 that were set up for you in which you were  
9 working?  
10 A. There were none.  
11 Q. So how did you develop those?  
12 A. I -- I -- I knew all the people who ran  
13 his campaign from prior -- I knew one of them had  
14 been my press secretary on my presidential  
15 campaign; one of them had worked on my  
16 presidential campaign. The others I -- I mean,  
17 they were not people that were known to me, so I  
18 went and got them out of their offices, and I  
19 brought them in -- and it took a little while to  
20 get them there, and, after some conversation, I  
21 asked them to please give me all this stuff that  
22 the president thought had been put together, and I

Page 881

1 basically got nothing. It took a little while. A  
2 couple of files were produced. They did give me a  
3 lot of names of different lawyers in different  
4 jurisdictions who had litigated pre-Election Day  
5 issues, some in Pennsylvania, but in other states,  
6 too, and it was unclear as to whether they were  
7 lined up to do post-election litigation or they  
8 were just lawyers who would handle the case back  
9 in June, or back in whatever.  
10 These were challenges to -- for  
11 example, you know the ones in Pennsylvania because  
12 challenges to the changes that were made was done  
13 in several different states, maybe five, six. In  
14 many of them they were litigated as a violation of  
15 the constitution because it was executives making  
16 what were state legislative decisions, that kind  
17 of --  
18 Q. All right.  
19 A. But there were also other contests,  
20 maybe more picayune, but the kind of stuff that  
21 goes on, you know, in elections.  
22 Q. All right. So at some point while you

Page 882

1 were there did you get a -- receive a call from  
2 Corey Lewandowski?  
3 A. Once I listened to Corey's testimony,  
4 it sounds like he -- he thinks he did it the next  
5 day. I think he did it that day, but all right.  
6 Q. Well --  
7 A. I did -- I did -- I did receive a call,  
8 it may have been from Pam Bondi.  
9 Q. Okay.  
10 A. They were together.  
11 Q. Okay.  
12 A. Pam Bondi was, as Corey Lewandowski  
13 said, the former Attorney General of Florida. She  
14 was a very active participant in the Trump  
15 campaign.  
16 Q. And what did she ask you to do?  
17 A. She asked me to come to Pennsylvania  
18 and she described the following set of facts to  
19 me. She said that, when -- when the republicans  
20 arrived, a large number of them, to be inspectors  
21 at this gigantic convention center, they weren't  
22 allowed in. And then when they were allowed in,

Page 883

1 ballot counting had already started and they were  
2 literally -- this is the way she described it --  
3 they were put behind barriers like cows and they  
4 weren't allowed to see -- and they had -- up to --  
5 up to this point, they have seen nothing. I said,  
6 you mean they have -- I had -- way, way back in my  
7 career, I had been an -- an inspector, election  
8 inspector, for the democratic party, and I was  
9 like 22, and I had been involved in several of  
10 these and I had remembered watching Bush v. Gore  
11 and the chads... I said, "You mean they're not  
12 looking at the -- at the -- they're not looking at  
13 the ballots? How many have been counted so far?"  
14 She said, "I don't know. A couple -- a  
15 couple hundred thousand, I think.  
16 I said, "Can't be. They couldn't have  
17 counted a couple hundred thousand".  
18 She said, "Well, that's what the number  
19 was given". And she said, "But we haven't gotten  
20 to see anything". And --  
21 Q. So she asked for your help, correct?  
22 A. Yeah, but I can't remember the stage

Page 884

1 now it was at. Because she asked and I declined.  
2 I said, "Gee, Pam, I don't -- I don't have the --  
3 I don't have the time. Let me send someone,  
4 because I got like five other or six other" -- I  
5 don't remember the number at that point; they kept  
6 growing -- "jurisdictions that I have to deal  
7 with. Let me send Boris or let me send Jenna".  
8 Jenna Ellis was really my number two. It was I  
9 was the head of the team, and I immediately  
10 appointed her as my deputy, so the president would  
11 have someone he could communicate with if it  
12 wasn't me, once I realized that this was going to  
13 be long standing.  
14 Q. Was a decision made at some point that  
15 you were to go?  
16 A. Yeah. The decision was made -- I may  
17 have even talked to the -- I don't know if I  
18 talked to the president about it, or maybe Mark  
19 Meadows, his chief of staff.  
20 I mean, I really didn't want to go  
21 because I had so many things to organize and it  
22 seemed to me that just one jurisdiction wasn't

Page 885

1 worth sacrificing getting started in the others,  
2 and I was looking at something I never expected.  
3 I was looking at nothing. We had no preparation  
4 or anything. And I even asked one of them, "Can  
5 you start writing a complaint," and they told me  
6 they never wrote a complaint. And that's when I  
7 said, "I'll -- I'll write one. I'll write -- I  
8 used to do it as a young associate. I think I can  
9 remember how to do it, well, damn it," or  
10 something like that.  
11 Q. So this -- after the decision was made  
12 for you to go to -- to Pennsylvania, did you go  
13 down that day?  
14 A. I did. I went -- I -- I finally  
15 decided -- I mean, they called me back several  
16 times and they -- they told me they were being,  
17 you know, pushed around and -- I don't remember if  
18 they -- at some point along the way, they got the  
19 decision from Judge Cannon --  
20 Q. Well let's -- before that decision.  
21 A. But I don't think they had it yet.  
22 Q. All right, so -- so you went down to

Page 886

1 Philadelphia --  
2 A. I drove down. It took six hours.  
3 Q. You drove down, and you -- and you got  
4 down there --  
5 A. I brought -- I brought several of my  
6 people with me. I can't remember exactly who, but  
7 I brought two with me. I think I may have brought  
8 Jenna. I know I brought Boris. I think I left  
9 Jenna to run the office, very early on. I mean, I  
10 think that's when I selected her as number two. I  
11 said "Okay, you're number two now".  
12 I brought Dr. Ryan with me.  
13 Q. Right.  
14 A. I may have taken Christiani or --  
15 Q. So --  
16 A. I took a third person -- I took a third  
17 person. I'm not sure. So it was about three or  
18 four of us in the car. We drove from  
19 Washington --  
20 Q. Right.  
21 A. -- to Philadelphia and got directions  
22 to -- to the convention center.

Page 887

1 Q. So sometime in the afternoon of the 4th  
2 you -- you went to Philadelphia. Did you go to  
3 the campaign headquarters at that time?  
4 A. No, I went -- I think this is the  
5 order. Could be wrong. Could be the other way  
6 around. I think I originally went right to the --  
7 they -- they -- they seemed to be under a lot of  
8 stress.  
9 Q. Who is "they"?  
10 A. Corey and Pam and also this gentleman,  
11 Mike Roman, that he -- that Corey mentioned. I  
12 mean, legitimate, they seemed like they were  
13 really in -- and I think -- I think at that point  
14 they described this extraordinary conversation  
15 with the sheriff, that the sheriff wouldn't  
16 execute a court order. So I said I'd better go  
17 directly there.  
18 Q. Go -- go where?  
19 A. To the convention center.  
20 Q. So at some point you went to the  
21 convention center --  
22 A. At some point we --

Page 888

1 Q. In the afternoon?  
2 A. Yeah. We were originally to go to the  
3 campaign headquarters, Philadelphia campaign  
4 headquarters. Instead we went to the convention  
5 center.  
6 Oh, my goodness. I remember. I  
7 finally decided to go when Eric Bush -- Eric  
8 Bush... Eric Trump called me. Eric Trump called  
9 me from Philadelphia and he said, "You're really  
10 needed here".  
11 Q. So when you went to the -- the  
12 convention center, did you -- what did you see or  
13 hear?  
14 A. It was a -- first I spoke to -- Corey  
15 and Pam were both there.  
16 Q. Mm-hmm.  
17 A. They reiterated pretty much what  
18 they -- I had told you and what they had told me  
19 on the phone, that they had gone -- pretty much  
20 what Corey testified to. I think I -- I don't  
21 know if Corey and Pam did all the same things  
22 together. Or exactly who did what, but to me it

Page 889

1 was a joint enterprise. And Pam -- I probably  
2 talked to Pam more because she was a lawyer, but  
3 only because I was starting to try to figure out,  
4 well what -- what kind of legal remedy do we have  
5 to this? We -- we've gotten this order from Judge  
6 Cannon and we're still not allowed in.  
7 I talked to -- I talked to the  
8 Philadelphia Police.  
9 Q. No, the order from Judge Cannon was  
10 issued on the 5th, as far as you know? Or do you  
11 know what date it was issued?  
12 A. I don't know. I mean, it was -- it --  
13 I don't know what date it was published.  
14 Q. Mm-hmm.  
15 A. I believe -- I believe she -- she gave  
16 the order orally, and then she published -- she  
17 filed an opinion thereafter. Was it the same day  
18 or the next day, I can't tell you that. I didn't  
19 read an opinion. I was told her opinion. I  
20 never -- I read it much later.  
21 The only thing I -- nor -- nor did I  
22 see Corey's piece of paper. He just told me about

Page 890

1 it.  
2 Q. Right. Now did there come a time --  
3 A. So, when I heard that, I went to the  
4 police, the highest police officer there, because  
5 I know the Philadelphia Police Department. I  
6 represented the former FBI Association as a  
7 private lawyer, I also represented a lot of police  
8 departments, and I knew the Philadelphia Police  
9 Department.  
10 So, I said, "What's going on with  
11 the -- what's going on with the sheriff?" Well, I  
12 can't repeat his language, but he basically said  
13 that, "I -- I don't know. The sheriff is off the  
14 reservation," that, yes, they should be allowed  
15 in, and in fact as campaign officials they should  
16 be allowed in. Most of them were registered  
17 campaign officials, but he's not letting them in.  
18 Then I had a number -- once people  
19 realized who I was, I was surrounded by republican  
20 campaign volunteers, the ones who -- and they  
21 started explaining to me a lot of the things you  
22 see in the affidavits. You know, we -- we -- we

Page 891

1 weren't allowed to see any ballots. Thank  
2 goodness we have Mercer. He -- Mercer's organized  
3 it, so I asked to see Mr. Mercer. And I met with  
4 Mr. Mercer. Jeremy Mercer explained to me that he  
5 came there that day in the morning, ready to do  
6 what he normally did for years, which is to sit  
7 down -- you know, he realized there would be space  
8 somewhat, but be equally spaced away from the --  
9 from the official counter so that they could see  
10 the ballots, which he said he had done many, many  
11 times in the past. And instead he was told he  
12 wasn't -- first he wasn't allowed in, then when he  
13 was allowed in, he was put behind a pen, then he  
14 never got within 30 -- 30 yards he said of --  
15 basically he couldn't see anything, and he kept  
16 complaining about it; didn't do any good. Then he  
17 organized his team, so they could do something  
18 useful, to just try to keep count of how many  
19 ballots were getting -- that they could see.  
20 Couldn't see the details on it but they could see  
21 the ballots going into the machine, to just try to  
22 keep count of that, so we could see how many

1 invalid ballots there were.

2 Q. All right. Did there come a time when  
3 a decision was made first, that you made, to  
4 assemble a legal team?

5 A. Yeah, well, I went to the campaign  
6 headquarters. It was a very similar description  
7 of what happened there and how terrible it was.

8 Mr. -- I mean, Jeremy gave me the -- a  
9 list. I asked him, "Could you please" -- this was  
10 all very chaotic, and I did have people there  
11 taking notes, people who came with me, and then  
12 some of the people who volunteered to do it. I  
13 said, "It would be very helpful, Jeremy, if you  
14 gave me a list of who could testify -- who could  
15 testify to this, so we can get statements of some  
16 kind. I don't know exactly what our recourse is,  
17 but we should have this" -- I said, "This is  
18 chaotic. We should have it recorded as best as  
19 possible".

20 So he said, "Well, the best thing I can  
21 do, I'll give you the list of my team that I put  
22 together. I have that. I'll check off the people

1 who showed up and the people who were registered  
2 based on --

3 He took that. He handed it to me. He  
4 handed one to Dr. Ryan. He handed one to my other  
5 assistant. And then other people told me their  
6 versions of how they had been pushed out --

7 Q. Right.

8 A. -- or not allowed to do what they were  
9 supposed to do.

10 Q. But I was referring to the team of  
11 lawyers that you -- were going to help you down  
12 there.

13 A. Well, I was doing that -- I was doing  
14 that when I got taken away to --

15 Q. Right.

16 A. Philadelphia. I did it somewhat in the  
17 car on the phone.

18 Q. And who was on this --

19 A. Well, the team -- the team pretty much  
20 was assembled as follows... it was myself, Jenna  
21 Ellis, who was number two, Boris Epshteyn was on  
22 it, Joe diGenova and Vicky Toensing, they are

1 husband and wife. Joe diGenova, Vicky Toensing.  
2 Toensing is spelled T-o-e-n-s-i-n-g.

3 Q. And were there local lawyers --

4 A. They were the main -- they were the  
5 main group. Christina, who -- who testified  
6 earlier, joined us about a week and a half later.

7 Q. And were there local lawyers there when  
8 you got there who had already been working on the  
9 case, who had been working on the team?

10 A. There was no team.

11 Q. Right. So when -- were there local  
12 lawyers that were put on the team?

13 A. Oh, I got -- I was then given the names  
14 of many, many lawyers. I was in the process of  
15 talking to them when I left to go to Philadelphia,  
16 some of which seemed to be really on top of what  
17 was going on, like our lawyer in Michigan, Thor,  
18 and some of whom didn't even know they were our  
19 lawyers. It was completely -- there was a section  
20 of issues where we had names down who had never  
21 been contacted, names down that quit, names down  
22 that quit then, and names down that sounded to me

1 like they didn't know what the hell they were  
2 doing -- or what they were doing, excuse me, and  
3 then names that were really highly confident. It  
4 depended on the jurisdiction, and you had to make  
5 those decisions quickly.

6 I distinctly remember the lawyer in  
7 Michigan and the lawyer in Wisconsin. I said,  
8 "Thank god. We've got some real lawyers".

9 Q. So was Mr. Hicks there?

10 A. No, Mr. Hicks was not in Washington.  
11 Mr. Hicks --

12 Q. No, no. Down in -- in Philadelphia.

13 A. Oh, did he meet me at the --

14 Q. No, was he part of -- was he local  
15 counsel down in Philadelphia?

16 A. He was, but I'm not sure I -- I knew  
17 that at the point that you're asking me about.

18 Q. Right.

19 A. The first one that I met was Laura  
20 Kearns who was there.

21 Q. Was it Laura or Linda?

22 A. Linda, I'm sorry. Linda Kearns. I

1 don't know if she was at the convention center or  
2 I met her at the -- at the -- at the campaign  
3 headquarters. But she had been doing the  
4 immediate litigation involving access, and -- and  
5 that's all we talked about. We really didn't talk  
6 about any bigger case.

7 She did -- she may have been one of the  
8 first told me that Hicks was involved in the  
9 overall case.

10 Q. And was Mr. Hicks working -- when did  
11 Mr. Hicks begin to work on the case, if you  
12 recall?

13 A. It seems to me he was working on it  
14 before.

15 Q. Mm-hmm.

16 A. When I first talked to him, he knew an  
17 awful lot about it. I mean, he -- I can't tell  
18 you when. He -- he had represented us, meaning  
19 the campaign, in prior cases in Pennsylvania, and  
20 when I spoke to him I immediately said, okay, this  
21 guy knows what he's talking about.

22 Q. Now you were asked this morning a

1 started with?"

2 Q. So this was at the very outset?

3 A. Yeah, it was at the very outset that  
4 I -- I had a discussion -- could be Ken Starr, I  
5 don't remember exactly -- who got this idea, you  
6 know, "You really can't get" -- I think the advice  
7 was, "Don't get too involved in one case in one  
8 jurisdiction. This is going to have to be a  
9 multi -- it sounds like it's going to have to be a  
10 multi-jurisdiction case".

11 So I -- I started thinking, "Well, let  
12 me draft up a little language so they'll start  
13 thinking that way".

14 And that's what I worked on in the car.  
15 I couldn't do too much of it because I get sick if  
16 I work in the car.

17 Q. Okay, now, you already testified about  
18 your role in the first amend complaint, but at  
19 what point was it decided the second amended  
20 complaint should be drafted?

21 Well, let me put it this way. How --  
22 prior to the November 17th argument before Judge

1 question about a deposition you gave in Colorado?

2 A. Yeah, the Coomer deposition.

3 Q. Right. And you were asked I think  
4 about the work you had done on the first  
5 complaint?

6 A. Yeah. I think I have it here. I think  
7 it's important to look at the exact language,  
8 because I think it was taken out of context.

9 Yeah, that's -- that's a -- that's a  
10 defamation case by an employee of Dominion Equity  
11 who -- who quit --

12 Q. And can you expand --

13 A. -- and was suing the president and just  
14 about everybody that I know for defamation,  
15 including me. And in that case what I was  
16 describing is my trip back from -- I said I began  
17 writing a complaint on the way back from  
18 Philadelphia. I did.

19 Q. What complaint were you referring to?

20 A. The generic complaint. The complaint I  
21 was complaining about when I said, "Do you have a  
22 draft, just a draft complaint that we could get

1 Brann, how much earlier in relation to that was  
2 the second amended complaint prepared?

3 A. The second amended complaint was  
4 prepared at the last minute when I was surprised  
5 by the fact that there was a first amended  
6 complaint. I didn't know that. I thought we had  
7 one complaint. It was the one that I had signed  
8 off on that -- where I said I made 10- to 20% of  
9 the contribution. I don't know how much of the  
10 contribution I made. It wasn't very much. I  
11 shouldn't have said 10 or 20, because it may have  
12 been 15 or 30. What I did was contribute the idea of,  
13 let's broaden these allegations so that we could  
14 include other jurisdictions, because I'm starting  
15 to get very, very -- and this is like the second  
16 day, the third day, I'm starting to get eerily  
17 similar allegations from other districts. It  
18 almost seems like what they're telling me in  
19 Michigan is the same as what they're telling me in  
20 Wisconsin, which is the same as what they're  
21 telling me in Arizona... They all had these pens.  
22 Republicans claimed they couldn't see any paper --

Page 900

1 Q. Okay. So let's -- let's stick to  
2 Pennsylvania. So --  
3 A. In fact they were -- they were counting  
4 the number of -- some of our people were like  
5 counting -- they had like a competition, who had  
6 more complaints that came in. And we weren't  
7 soliciting these complaints. They were coming to  
8 us.  
9 Q. Okay, now who worked on drafting the  
10 second amended complaint?  
11 A. Well, I -- I worked on that.  
12 Q. No, besides you. Who?  
13 A. My team their: Joe -- Joe and Vicky  
14 diGenova wrote probably the core --  
15 Q. Who is Joe diGenova?  
16 A. Joe and Vicky and whoever was the  
17 associate working with them. I can't remember.  
18 Q. Was there local counsel working on it?  
19 A. Yeah, there was local counsel working  
20 on it.  
21 Q. That was --  
22 A. That was Mr. Scaringi -- yeah, he came

Page 901

1 in at the last name.  
2 Q. Who was that? You started to say his  
3 name.  
4 A. Mr. Scaringi.  
5 Q. Scaringi, okay.  
6 A. And he worked on the -- he may have  
7 even come into the office in -- in Arlington, but  
8 he worked with Joe and Vicky in putting that  
9 together. And then I -- I couldn't have had more  
10 than an hour with him.  
11 Q. And can you -- can you describe the  
12 atmosphere under which these documents are being  
13 drafted?  
14 A. Well, for them, they were -- meaning  
15 that team, right there, they were singularly  
16 focused on Pennsylvania, and then --  
17 Q. Well, what was the atmosphere? If you  
18 could paint a picture of her?  
19 A. I mean, at the beginning it was  
20 chaotic.  
21 Q. All right.  
22 A. By the time we get to -- what was it

Page 902

1 the 12th? When did I argue? The 16th, the 17th?  
2 Q. The oral argument was in February.  
3 A. It was probably still pretty chaotic  
4 by them. It was probably our first case.  
5 Q. Right. Now during this time while  
6 you're were getting -- you're preparing the  
7 documents and your hearing complaints from people  
8 down there. You're getting information from  
9 various sources I believe.  
10 Is that correct?  
11 A. Yeah?  
12 Q. And who was the people who were  
13 supplying this information to you?  
14 A. My goodness. Fifty people. I don't  
15 know. I mean --  
16 Q. Well, was it -- was -- was there  
17 someone who --  
18 A. As -- as -- Bernie Kerik, Bernie  
19 Kerik -- really Bernie's responsibility was  
20 investigating and trying to make -- and trying  
21 to -- trying to make some sense out of everything  
22 that we would get. I mean, what -- half to three

Page 903

1 quarters of what you get you just discard. I  
2 mean, I knew that from handling similar situations  
3 like that, and you try and focus on the ones that  
4 have the most possibilities or seem like you could  
5 expand on them. And I knew Bernie would have an  
6 instinct to that, because Bernie had done a lot  
7 of -- among the other things that he described,  
8 litigation investigation. So that I -- I couldn't  
9 look at the documents coming in and saying --  
10 saying -- "Oh, this one has no chance. Oh, this  
11 one we should follow up on". But Bernie would  
12 have an instinct for that.  
13 I asked him to get people like that.  
14 He used investigators and he used some paralegals  
15 and lawyers. And I remember --  
16 Q. Okay.  
17 A. I know we had a team -- I put my son  
18 Andrew in charge of the phones because he had  
19 gotten a lot of complaints that people were being  
20 treated horribly on the phone.  
21 Q. And do you recall --  
22 A. And he brought me -- he brought me some

Page 904

1 very significant information about another  
2 jurisdiction, and Bernie was taken off it for a  
3 while to have to go out there and investigate  
4 that.  
5 CHAIRMAN BERNIUS: Mr. Kamins, do you  
6 think this might be an appropriate time break --  
7 take our mid-afternoon break?  
8 THE WITNESS: I think so.  
9 MR. KAMINS: What time -- what time do  
10 we resume?  
11 CHAIRMAN BERNIUS: Let's take 15  
12 minutes, and I would very much like to complete  
13 the testimony of the witness today, if you can --  
14 MR. KAMINS: I would also. I would  
15 also.  
16 CHAIRMAN BERNIUS: That may be --  
17 absent objection from Mr. Fox, I would not be  
18 opposed to your leading a little more directly.  
19 MR. KAMINS: Okay, I will do that.  
20 CHAIRMAN BERNIUS: Thank you. We'll  
21 take a break until 3:30.  
22 MR. KAMINS: Thank you.

Page 905

1 MS. BORAZZAS: Opening up the breakout  
2 rooms now.  
3 (Recess taken.)  
4 CHAIRMAN BERNIUS: Okay, Mr. Kamins.  
5 BY MR. KAMINS:  
6 Q. A few more questions, Mr. Giuliani.  
7 So prior to your argument on the 17th,  
8 were you receiving information from various  
9 sources about the election?  
10 A. Yes. I -- I don't want to have to  
11 describe it as a large number of sources.  
12 Q. And was one of the sources a report  
13 from a -- a John Droz?  
14 A. Yes. That was given to me the day --  
15 day before the argument. Yes. I remember that  
16 distinctly for a particular reason, yeah.  
17 Q. And was there any specific page in that  
18 report that you -- or pages that you relied on for  
19 purposes of arguing the case or drafting the  
20 complaint?  
21 A. No -- well, there were two that I  
22 remember.

Page 906

1 MR. KAMINS: All right, if we could put  
2 the respondent's --  
3 THE WITNESS: And they affected -- and  
4 they affected --  
5 MR. KAMINS: Wait.  
6 If we could put Respondent's 11 up on  
7 the screen.  
8 BY MR. KAMINS:  
9 Q. And this is the -- Mr. Droz's report  
10 that was introduced this morning.  
11 Are there -- is there a specific page  
12 that you recall --  
13 A. Yeah, this would be -- this would be --  
14 this would be Biggs --  
15 Q. Which -- what page are you referring  
16 to?  
17 A. Well, I have it here. It's page -- I'm  
18 sorry. The page isn't here. But I remember the  
19 expert was Biggs.  
20 MR. LEVENTHAL: There's an exhibit up.  
21  
22 BY MR. KAMINS:

Page 907

1 Q. There's an exhibit up.  
2 A. Oh, well, there it is. Mr. Briggs,  
3 right. There you go.  
4 Q. And that's page 25, is it?  
5 A. That's page 25.  
6 Q. Right. And could you just describe  
7 what that --  
8 A. Yeah, that -- I mean, that interested  
9 me because -- and then I did a drawing, which I --  
10 I lost. It used to be in my papers. I recreated  
11 it myself. I did a drawing of it because -- what  
12 that -- what that demonstrates is that, overnight,  
13 the -- the -- the numbers changed from something  
14 like Trump ahead by 650 to Trump ahead by 150.  
15 Q. Is that thousand?  
16 A. Thousand, from -- and when I went to  
17 bed on the night of the election, I thought we had  
18 won Pennsylvania because he was ahead by 650,000  
19 votes -- or 700,000. I remember it was 700,000.  
20 If you look at that casually, it looks more like  
21 650,000. That's the -- that's the red line on  
22 top.

Page 908

1 The blue line, and you see at the  
2 beginning, is where Biden was when they suspended  
3 counting in Philadelphia. And they suspended  
4 it -- it wasn't -- they weren't supposed to  
5 suspend it. They decided -- they decided at the  
6 time they were going to suspend it. It happened  
7 to be the same time they suspended it roughly in  
8 Wisconsin, Detroit and Atlanta.

9 Q. All right.  
10 A. All four at the same time.  
11 Q. And in addition to that, so --  
12 A. In that period of time overnight,  
13 that's would -- that's a -- that is a  
14 representation of the raw vote. Because I -- I  
15 went back and had Boris check it and Colonel  
16 Walton.

17 So basically it was a change of Trump  
18 ahead by 650, to Biden ahead by 150, and it seemed  
19 to me, as -- as that kind of points out, that was  
20 statistically some people would say impossible,  
21 others would say improbable.

22 Q. And were -- and were there --

Page 909

1 A. With evidence like that -- I had read  
2 up enough about election law to know there's  
3 certain types of evidence that's admissible in  
4 election cases that would not be admissible in  
5 cases I was using. For example, extrapolations  
6 are allowed because of the time. Extrapolations  
7 are allowed because you don't have all the core  
8 data. You don't get the actual voting list until  
9 March. So you're never going to know who actually  
10 voted with great accuracy.

11 Sometimes the secretary of state can  
12 make an exception, but we didn't take the one,  
13 Pennsylvania.

14 Q. In addition -- in addition to page 25,  
15 was there any other page that you --

16 A. Yes, the next one is a -- is a more  
17 comprehensive analysis of what happened after  
18 they -- they unceremoniously stopped.

19 Q. Is this the page you're referring to?  
20 A. So what they did --  
21 Q. Excuse me, is this the page you're  
22 referring to?

Page 910

1 A. Yeah, that's the page I'm referring.  
2 Q. And this is page number 27?  
3 A. Yeah, that's the second one. I -- I  
4 did not do my own computations there, but I didn't  
5 have to.

6 Q. Mr. Giuliani, is this page 27?  
7 A. This is page -- maybe I'm going too  
8 fast.

9 Q. No, no, no, no. Look at the exhibit.  
10 Just look up on the screen. On the screen is that  
11 page 27?  
12 A. Yeah.  
13 Q. Okay. And you relied also on this --  
14 on the information in this page?  
15 A. Yeah. Now that's an -- that's an  
16 analysis of basically what happened in the days  
17 after the election, in the three or four days of  
18 counting, where each day, in the five or six  
19 places I was tracking, Biden got closer and closer  
20 and closer, and then he just got over the top and  
21 one.

22 What that shows is, every time there

Page 911

1 were additions, out of a hundred percent of  
2 additions, only 19% favored Trump. But the total  
3 number is totally wacky. The total number is  
4 Biden picked up 578,000 votes. Trump picked up  
5 33,290. Now that is, just as a matter of common  
6 sense, totally impossible. That means that Trump  
7 got -- I think I'm right is the compensation.  
8 0.04% to Biden's 99.06%, or six percent.

9 Q. Okay.  
10 A. That -- that -- that -- I've shown that  
11 to 10 different statisticians who say that is  
12 totally crazy. And this -- this is an exaggerated  
13 version of what happened in all the other  
14 jurisdictions, exaggerated because they had to  
15 make up more votes in Pennsylvania than any place  
16 else.

17 Q. All right. Now in addition to the Droz  
18 information, were you relying on information from  
19 a Mr. Navarro? Was that coming in to you also?  
20 A. That was part of an exchange. Mr.  
21 Navarro I know personally and, you know, worked  
22 with him a number of years.

Page 912

1           So we exchanged -- he -- he was doing  
2 his own analysis in the very beginning of the  
3 data, so, we exchanged quite a bit of information,  
4 and his chief assistant and mine -- and in this  
5 case it would be Christina, who testified -- they  
6 were almost in daily communication. So I -- I got  
7 any number of --  
8       Q. You're referring to Ms. Bobb?  
9       A. Ms. Bobb, yeah.  
10      Q. All right.  
11      A. And I -- so I knew his report long  
12 before it was published. I received the charts  
13 and made recommendations about them or vice versa.  
14 I would send over -- I may have, for example, what  
15 was just showed you there, I may have sent it here  
16 and asked him to go check the raw voter list,  
17 because those numbers you could term, are they  
18 accurate or not.  
19      Q. Okay.  
20      A. And in both cases, you can go back to  
21 the actual vote cast during that period of time.  
22           Where you're at a disadvantage is, you

Page 913

1 can't get the names of the people who voted on  
2 Election Day in most states until March.  
3       Q. Okay.  
4       A. So those have to -- so you have to  
5 extrapolate from what you have to what's out  
6 there.  
7       Q. Now in addition --  
8       A. And you're allowed to -- to do that --  
9       Q. Right. Additionally --  
10      A. At least that's what the cases that I  
11 read said.  
12      Q. In addition to Mr. Navarro, earlier  
13 today you saw on the screen four documents that  
14 were not introduced, that they were identified as  
15 Exhibits 40, 41, 42 and 43.  
16           Do you recall that?  
17      A. Sure. Oh, you mean the documents  
18 through Mr. Kerik?  
19      Q. Yes, the report --  
20      A. Yes, I do recall.  
21      Q. And did you rely on those documents in  
22 your investigation or drafting or argument --

Page 914

1       A. To some --  
2       Q. -- in this case?  
3       A. To some extent. I'd have to describe  
4 the extent. The answer would be yes, I did, and  
5 no, I didn't.  
6       Q. Okay. Explain -- explain that. Well  
7 do you want to do that individually --  
8       A. I'd have to see the documents to  
9 explain --  
10      MR. KAMINS: Right, why don't we put up  
11 first --  
12      THE WITNESS: But basically --  
13      MR. KAMINS: Let's put up -- let's put  
14 up Exhibit 40 for Mr. Giuliani, respondent's.  
15 BY MR. KAMINS:  
16      Q. Now with respect to that document, did  
17 you rely on that document to prepare any  
18 arguments?  
19      MR. FOX: Objection. This is not in  
20 evidence.  
21      CHAIRMAN BERNIUS: Overruled.  
22      THE WITNESS: Well, I -- I saw that

Page 915

1 document and it was described to me, as well,  
2 orally, and the only thing that impressed -- I  
3 mean, and I knew, as Mr. --  
4      CHAIRMAN BERNIUS: I think -- I think,  
5 you know, we ought to answer the questions that  
6 was posed and then --  
7      THE WITNESS: I'm sorry. I thought we  
8 were going to -- okay. Sorry.  
9 BY MR. KAMINS:  
10      Q. Did you rely on that document in  
11 preparing --  
12      A. In part, only in part.  
13      Q. All right.  
14      MR. KAMINS: And would -- let's put up  
15 document --  
16      THE WITNESS: Can I tell you the part?  
17 BY MR. KAMINS:  
18      Q. Well, if you recall the part, sure.  
19      A. Sure. I relied on it because it's such  
20 a large number. I didn't -- I didn't think it was  
21 accurate or inaccurate, because there was no time  
22 to. But I assumed that over the course of the

Page 916

1 next couple of weeks we would figure out how many  
2 of those were actually -- voted that were 112  
3 years old. I think the gross number there was  
4 1,111. This was only, remember, only the mail-in  
5 ballots. That leaves the far larger number of  
6 voters on Election Day still out there. So you  
7 could extrapolate maybe double this in an  
8 argument.  
9 So what I would have wanted to know was  
10 how many of those were real, and the number 1,111  
11 seemed like it had a large universe to work with.  
12 Q. So you relied --  
13 A. That that would have been --  
14 Q. Right. So you relied in part on the  
15 information in this --  
16 A. Yeah, it was a large number. If it  
17 turned out they were all inaccurate, or they were  
18 all accurate... But it looked like it was  
19 starting -- if that had said 100, I would have  
20 thrown it out and said, forget about it, as I did  
21 many things.  
22 MR. KAMINS: Can you put up Exhibit 41,

Page 917

1 please.  
2 BY MR. KAMINS:  
3 Q. Now with regard to this exhibit, did  
4 you rely in part or at all on this -- the  
5 information?  
6 A. Pretty -- pretty much the same, the  
7 same thing. This was only one of four or five  
8 different reports I was given either before -- and  
9 here I'm sorry, judge, it would be also after the  
10 argument about death analysis, and it -- it  
11 changed quite a bit.  
12 Again, that seemed to be a large --  
13 again, a large number to start with, just for  
14 absentee ballots. So it seemed to me that that  
15 was a fruit -- that would be a fruitful area from  
16 further investigation and one on which you could  
17 make an argument that there certainly were dead  
18 people who voted.  
19 Then I had -- I had experts in addition  
20 to this that looked at different reports like this  
21 and it varied from 2,000 to 10,000. It was -- so  
22 I never really used an absolute number. I just

Page 918

1 knew that was an area where we were going to  
2 probably get a bunch -- a bunch of dead people who  
3 voted, which is not uncommon in Philadelphia.  
4 MR. KAMINS: Could you put up Exhibit  
5 42.  
6 BY MR. KAMINS:  
7 Q. Now, with -- with respect, Mr. Giuliani  
8 to Exhibit 42, did rely in part on information  
9 from this document?  
10 A. For the -- in the same way that I  
11 described. Fairly significant number, given the  
12 limitations, that are explained there. Including  
13 here they -- they illustrate the point that I was  
14 making about extrapolating from -- from the --  
15 from the numbers. But they just extrapolated to  
16 the -- based on the mail-in ballots. So you'd  
17 have to more than double that if you were going to  
18 extrapolate that to all the ballots.  
19 But I -- I knew that one of the areas  
20 that would be fruit for us and that continued in  
21 Pennsylvania would have been dead people voting,  
22 which is perennial problem there.

Page 919

1 MR. KAMINS: All right, can you put up  
2 Exhibit 43.  
3 BY MR. KAMINS:  
4 Q. Now, Mr. Giuliani, did you rely at  
5 least in part on information in this report?  
6 A. It was so -- except again the number.  
7 That's a -- that's a lot of similar names of --  
8 Mr. Fox's point is well taken, that the names are  
9 similar. So a lot of them are going to turn out  
10 to be probably coincidence. I couldn't believe  
11 that all of them were coincidence, when you're  
12 talking about 214,410, but it didn't have any  
13 instinctual feeling to this. It's something I  
14 would have followed up on. It's -- it's something  
15 that told me -- all these things together told me,  
16 this was a really screwed up election. Sorry for  
17 the vernacular, but that's the way it -- it said  
18 to me that we were pursuing a legitimate case,  
19 that we weren't making this up, that -- that  
20 there's a lot of problems here.  
21 And then you know, the 240 affidavits,  
22 all of which laid out anywhere from one to 120,000

Page 920

1 irregularities, said the same thing to me.  
2 MR. KAMINS: All right, Mr. Chair,  
3 based on Mr. Giuliani's testimony, we would now  
4 move into evidence Exhibits 40 through 43.  
5 CHAIRMAN BERNIUS: Mr. Fox?  
6 MR. FOX: I don't object as long as  
7 they're not admitted for their truth. If they're  
8 just admitted for the fact that Mr. Giuliani  
9 relied on them, that's fine.  
10 MR. KAMINS: That is the purpose of the  
11 application.  
12 CHAIRMAN BERNIUS: These exhibits are  
13 admitted solely for the purpose of demonstrating  
14 that Mr. Giuliani relied on them and to show his  
15 state of mind. They are not being offered for the  
16 truth of their contents.  
17 MR. KAMINS: Thank you.  
18 CHAIRMAN BERNIUS: Or they're not  
19 being -- they're not being admitted for the truth  
20 of their contents.  
21 MR. KAMINS: Thank you, Mr. Chair.  
22 BY MR. KAMINS:

Page 921

1 Q. Now, Mr. Giuliani, as to the second  
2 amended complaint, did you knowingly make any  
3 allegation that you knew or believed --  
4 A. No.  
5 Q. -- did not -- did not have any basis in  
6 law or fact?  
7 A. No, I would never -- no, I would never  
8 do that.  
9 Q. Have you ever been disciplined by any  
10 grievance committee anywhere?  
11 A. No. Fifty years of practicing law,  
12 I've never been disciplined. I've never been  
13 cited. I've never been -- complaint, you know.  
14 Q. Have you ever --  
15 A. Except for people that I convicted who  
16 wanted to kill me I guess.  
17 Q. So the answer is no?  
18 A. No, I've never had a disciplinary  
19 proceeding of any kind after 50 years of law  
20 practice.  
21 Q. My question -- yeah, Mr. Giuliani, of  
22 course was prior to this litigation.

Page 922

1 A. Prior, yes, of course. Prior to this  
2 litigation. Since then I have.  
3 Q. And have you ever been accused of  
4 filing a frivolous lawsuit --  
5 A. No, sir.  
6 Q. -- or making a frivolous claim?  
7 A. No, no, I haven't.  
8 Q. Now the chair asked you yesterday to  
9 explain the theory under which the two individual  
10 plaintiffs sued the seven counties in which they  
11 did not live rather than the two counties in which  
12 they did live.  
13 A. Could -- sure.  
14 Q. Is there anything you'd like to amplify  
15 about that?  
16 A. I would. I would.  
17 I -- when I analyzed standing in this  
18 case, it seemed to me that standing would not be  
19 an issue because the president of this, committee  
20 or plaintiffs, they -- and -- and once the  
21 president lost, he stepped into the place of the  
22 committee and was an injured party. So he surely

Page 923

1 had standing. I didn't -- didn't think we would  
2 have any problem with his standing. And you can  
3 see on page 12, paragraph --  
4 Q. Where -- where are you reading from?  
5 A. I'm talking about the second amended  
6 complaint, which is the one that I would be the  
7 most familiar with and had input into, which  
8 specifically alleged on paragraph 21 --  
9 MR. KAMINS: Why don't we put up the --  
10 the second amended complaint, which is the --  
11 their exhibit.  
12 BY MR. KAMINS:  
13 Q. Which paragraph?  
14 A. This is what I was referring to  
15 earlier. "After the primary election, a candidate  
16 steps into the shoes of his party".  
17 Q. Identify the paragraph.  
18 A. It's paragraph 21, page 12 of the  
19 complaint.  
20 Q. Of the document?  
21 A. Page 23 of the document. "After the  
22 primary election, a candidate steps into the shoes

Page 924

1 of his party and their interests are identical.  
2 "A candidate for office in the election  
3 at issue acts as a direct and substantial arm  
4 sufficient for standing can test the manner in  
5 which an election will be conducted, is the direct  
6 and proximate result of the actions of the  
7 defendant in that each member of the Trump  
8 campaign has been injured in a way"... et cetera,  
9 et cetera, et cetera.  
10 So I -- and then the next page, page  
11 24. It would be page 24 -- I'm sorry, page 23,  
12 excuse me, page 23.  
13 Q. What paragraph?  
14 A. Paragraph 21.  
15 MR. LEVENTHAL: We just did that,  
16 right?  
17 MR. KAMINS: Yeah.  
18 THE WITNESS: Yes. So I would have --  
19 I would have considered that to be, first of all,  
20 an assertion of competitive standing of which, to  
21 me, was not an a issue because he was a -- a  
22 candidate. A candidate is surely injured when he

Page 925

1 loses and he alleges irregularities or wrongdoing  
2 in the election of which there were plenty of  
3 allegations of that.  
4 And second, there is the almost  
5 universal -- it is a universal rule -- criticized  
6 because it's used so much -- of the one -- if one  
7 plaintiff has standing, you don't inquire and you  
8 don't -- the standing of the others is just  
9 assumed. That's been discussed and affirmed in  
10 about 12 Supreme Court decisions. I can give you  
11 a quick cite to that. This would be --  
12 Q. You're referring to -- what are you  
13 referring to, Mr. Giuliani?  
14 A. I'm referring to a William and Mary  
15 article that summarizes numerous Supreme Court  
16 decisions.  
17 Q. So why don't we -- why don't we get the  
18 title and the name of the article.  
19 A. One Good Plaintiff is Not Enough,  
20 William and Mary Law School, 2017, page 484.  
21 I mean, I just -- I just -- this is --  
22 this is just one of a hundred documents you could

Page 926

1 get...  
2 "The one-plaintiff rule is applied with  
3 considerable frequency". I should add this law  
4 review article criticized it and suggested it be  
5 reversed. Maybe it should be. But as his lawyer,  
6 I'm not going to --  
7 Q. Is there something you remember -- is  
8 there something --  
9 A. "The one-plaintiff rule is applied with  
10 considerable frequency. It has been invoked in  
11 more than two dozen supreme court cases and  
12 probably a hundred that didn't -- in the local  
13 federal courts --  
14 Q. Slow up, slow up --  
15 A. -- "and it's figured in several of the  
16 highest-profile cases for the last several years.  
17 Then they go on and list the Travel Ban  
18 case, the Obama administration, Deferred  
19 Immigration Action program, the Affordable Care  
20 Acts case, the Climate Change case, the Same-Sex  
21 Marriage case, and King vs. Burwell, which was the  
22 most recent Supreme Court case involving the

Page 927

1 Affordable Care Act.  
2 Again, basically the theory is, if one  
3 plaintiff has adequate standing, you're not going  
4 to inquire into the standing of the others.  
5 You're going to litigate it and get it done in  
6 federal court.  
7 So I did not do a detailed analysis of  
8 Robert's standing or -- or the other defendant,  
9 who I never really even met --  
10 Q. You mean the plaintiff?  
11 A. The plaintiffs. I -- I -- I did assume  
12 that they were injured parties and probably, if we  
13 fail here, we fail on the third prong of this  
14 standing test, which is there wouldn't be a -- a  
15 real, practical remedy for that. But I didn't  
16 think that -- I'm sorry, I didn't think that was  
17 a -- I certainly don't allege anything's untrue.  
18 I voided out who they were, what they did. Didn't  
19 pretend they had standing. And the -- and the one  
20 that I did lay out the standing for is -- it's  
21 perfectly adequate standing and then I had a  
22 perfect right to rely on the one-plaintiff rule,

Page 928

1 even though it's criticized by law reviews, and I  
2 may even find it kind of strange.  
3 Q. All right --  
4 A. We also -- one other thing.  
5 I also felt pretty secure because he  
6 was -- we were -- I thought we would have the day,  
7 would have standing at least against Boockvar, who  
8 was the secretary of state, who really created the  
9 confusion in the first place with her inconsistent  
10 letters about whether you could cure or not.  
11 And -- we had witnesses that would testify about  
12 that, including lawyers, republican lawyers who  
13 said they had to revise their committees not to  
14 cure because it was a violation -- it was a  
15 violation of the law in the state legislature,  
16 which would prevail over a judicial decision based  
17 on the independent legislation -- legislative  
18 theory, which at that point, I don't know of it  
19 was good law, but it was certainly an option that  
20 might very well be invoked by the Supreme Court,  
21 and one that was very much in our mind.  
22 Q. All right.

Page 929

1 A. So that's standing.  
2 Q. All right, now, one last --  
3 A. I don't think I made any inaccurate  
4 argument, statement, or if I missed one prong of  
5 the test, I'm sorry, but I -- I didn't mean to and  
6 I certainly didn't make any untrue allegations in  
7 this document. I did the best I could with the  
8 time that I had to be accurate, and I --  
9 Q. One last point, Mr. Giuliani.  
10 Professor Ortiz this morning was asked by Mr. Fox  
11 if the second amended complaint had any -- or I  
12 think this was yesterday, if the second amended  
13 complaint had any evidence of fraud or alleged  
14 fraud, and he said no.  
15 To save time, could you give the chair  
16 and the panel the paragraphs in which you believe  
17 that those allegations were made?  
18 A. Sure.  
19 Q. Rather -- rather than reading them.  
20 MR. KAMINS: I think we'll put that up  
21 on the screen as an exhibit.  
22 THE WITNESS: I just would like to

Page 930

1 point out one -- one other thing, that Mr. Fox  
2 alleged that we were being deceptive or -- about  
3 the Carter-Baker report where at some point the  
4 word "potential" was left out of a quote.  
5 I want to point out that page 38 of the  
6 exhibit, paragraph 59, we quoted accurately. We  
7 left it out of one of the documents. It was not  
8 intended. I want to assure the panel it was not  
9 intended to mislead anybody. We certainly had  
10 alleged it right here in the complaint that it was  
11 potential voter fraud. It may be a difference  
12 between potential voter fraud and voter fraud, but  
13 the -- the thrust of it was that, of the various  
14 ways of which to vote, mail-in voting has always  
15 been considered the most prone to fraud, or  
16 potential fraud. But we certainly quoted it  
17 accurately and had no intent to deceive anybody.  
18 BY MR. KAMINS:  
19 Q. All right. With respect to my question  
20 on allegations of fraud, would you just cite the  
21 paragraphs in the second amended complaint for  
22 the -- for the panel.

Page 931

1 A. Okay, yeah, I'll do these first.  
2 Q. Page?  
3 A. Well, here -- I mean, here --  
4 Q. A page?  
5 A. A page? Sixty-six.  
6 Q. One second. A paragraph number.  
7 A. The paragraph number is 128.  
8 First of all, I would -- I would use  
9 that as an example, first of all, a specific  
10 allegation. It's as specific as you can make it:  
11 "Allegheny County Poll Workers". We had witnesses  
12 who would testify to that. And they would -- they  
13 would say that they were uniformly unable to do  
14 what they had done for 20 years, which is to look  
15 at the ballots.  
16 Q. Next paragraph.  
17 A. And -- okay, number 129, "In Centre  
18 County, a poll worker reported that persons  
19 appearing at the polls and admitting that they  
20 were New Jersey voters rather than Pennsylvania  
21 voters were nonetheless provided provisional  
22 ballots on which to vote". That would clearly be

Page 932

1 fraud. It alleges the place. It alleges the --  
2 the allegation, itself, and there -- there -- we  
3 would have provided witnesses. But all we have to  
4 do is allege it at this point. We can't -- the  
5 complaint is not the place to put evidence. You  
6 don't put evidence in a complaint. You put  
7 allegations in the complaint which is deemed to be  
8 true. And this I had support for. I didn't make  
9 this up.  
10 Q. Okay, next paragraph? Number 97.  
11 A. Oh, page 97.  
12 Q. Paragraph number?  
13 A. This one here is --  
14 Q. Paragraph number.  
15 A. Paragraph number 224. I would site  
16 this both for fraud and for a specific allegation  
17 of fraud, or whatever you -- you want to call it.  
18 Because we were using fraud, not in a -- we  
19 weren't trying to convict them of fraud, civilly  
20 or criminally. We were using fraud as one of the  
21 ways in which the president, his committee and the  
22 others, were denied Due Process and Equal

Page 933

1 Protection. There is no fraud claim. It's an  
2 Equal Protection and Due Process case.  
3 So this one mentions the person,  
4 Andrew, George Andrew Gallenthin, who's been a  
5 resident of Pennsylvania for 28 years. "On  
6 November 20th, he was a credentialed observer of  
7 vote counting and verification. On November 4, he  
8 arrived at the convention center to observe city  
9 employees count absentee and mail-in ballots. He  
10 was barred by city officials from entering the  
11 area where the vote counting was taking place.  
12 Mr. Gallenthin waited in the lobby at the  
13 convention center from 10:00 to 4:00 p.m. but was  
14 never allowed to observe the vote counting and  
15 verification area.  
16 "Mr. Gallenthin also served as an  
17 official observer for the 2020 Trump campaign in  
18 Buck County, Pennsylvania from 10:00 p.m. November  
19 3rd through 7:00 p.m. on November 4th, when he was  
20 able to observe, without issue, the ballot  
21 processing in Bucks County, as were Biden campaign  
22 watchers".

Page 934

1 I would say that's an allegation of  
2 fraud, or from which you can infer fraud -- which  
3 is the way I always did as a prosecutor -- when  
4 you put together a thousand times in which people  
5 were barred from not seeing paper, you can infer  
6 fraud.  
7 Q. Next paragraph.  
8 A. Similarly, you can infer when someone  
9 invokes the Fifth Amendment in a civil proceeding,  
10 you can infer that they're guilty, in a civil  
11 proceeding. That's what an inference is.  
12 The pattern of conduct that we allege  
13 all throughout here, which I won't bore you with  
14 to go through it, but the pattern of conduct here  
15 was so extensive that it certainly allowed an  
16 inference of fraud.  
17 Now you can rebut, you can -- we're at  
18 the first stage of a proceeding, I would point  
19 out, not -- we're not even at the hearing.  
20 Q. Next paragraph?  
21 A. A hundred and thirty-one, "In Delaware  
22 County, an observer of the counting" --

Page 935

1 Q. What page? What page is that?  
2 A. I'm sorry, 67, 131. "In Delaware  
3 County, an observer at the county offices" --  
4 MR. FOX: I'm confused. Are we -- is  
5 it -- are we going to put this up, and if not --  
6 There, thank you.  
7 THE WITNESS: I'm sorry, 131, "In  
8 Delaware County an observer at the county office  
9 observed issues related to mail-in voting ballots  
10 being scanned through machines four or five times  
11 before finally being counted.  
12 "When a voting machine warehouse  
13 supervisor arrived to address this" -- da, da,  
14 da -- "they must be defective".  
15 From that and other allegations like  
16 that, of which there were 15, 20, you can allege  
17 that those were multiply counted, which there was  
18 testimony. This is the allegation. That would  
19 have been shown at the hearing, which we never  
20 had. But that's the -- that's the function of a  
21 complaint, and then finally, you present your  
22 evidence at an evidentiary hearing, not in the

Page 936

1 complaint. This is about as specific as I could  
2 be.  
3 Q. The next paragraph.  
4 A. Then in -- the next one is very  
5 similar, 132.  
6 One thirty-three is an entirely  
7 different area we haven't talked about, and that's  
8 the fraud with the U.S. Postal -- the mail  
9 carriers, and the Mail Carriers Union, 133...  
10 "Mail carriers had noted significant  
11 anomalies related to the delivery of mail-in  
12 ballots."  
13 "A mail carrier for the USPS in Erie  
14 County has noted that, during the course of the  
15 general auditing mail-in ballot delivery period,  
16 there were multiple instances in which dozens of  
17 mail-in ballots were addressed to single  
18 addresses, each ballot being in a different name.  
19 "Based on the carrier's experience  
20 delivering mail to these addresses, the carrier is  
21 aware that the people whose names were on the  
22 ballots are not names of people who live at those

Page 937

1 addresses.  
2 "In addition ballots were mailed to  
3 vacant homes, vacation homes, empty lots, and  
4 addresses that don't exist."  
5 Now I would submit that that is also  
6 specific, as specific as a complaint can be,  
7 particularly Due Process and Equal Protection in  
8 which fraud is one example. You can certainly  
9 infer, if not conclude, fraud if this is true.  
10 Q. Mm-hmm.  
11 A. Which it has be to assumed to be true.  
12 Q. Next paragraph.  
13 A. And I think I did my job correctly  
14 there, because I had support for that.  
15 Q. Last one.  
16 A. Now finally, and I had this report.  
17 "It has been reported by Project Veritas" --  
18 Q. What page?  
19 A. This is page 57 -- I'm sorry, 68 that  
20 you have. It's 134.  
21 Q. Paragraph 134?  
22 A. One thirty-four.

Page 938

1 "It has been reported by Project  
2 Veritas" -- with which I was very familiar.  
3 Project Veritas supports everything it does with  
4 tape recorders.  
5 "It has been reported by Project  
6 Veritas in a release of November 5, 2020 that  
7 carriers were told to collect, separate and  
8 deliver all mail-in ballots directly to the  
9 supervisor.  
10 "In addition, plaintiffs' have  
11 information that the purpose of that process was  
12 that the supervisor hand stamp the mail-in  
13 ballots".  
14 Now I personally confirmed that with  
15 the head of Project Veritas, but I did that after  
16 the complaints, after this was written, because  
17 I -- I was going to add him as a witness but never  
18 had the opportunity to do it.  
19 Q. I see there are like only a few more  
20 paragraphs but we -- we -- we can --  
21 A. Yeah, there are other paragraphs, you  
22 know, that I had outlined.

Page 939

1 Q. Were these a representation --  
2 A. Other counties, very similar  
3 allegations of direct fraud, like that, or from  
4 which you can infer fraud, given the multitude of  
5 times that it happened, incomprehensible, that  
6 would just happen coincidentally, that also. Or  
7 at least you would argue that as a litigator.  
8 One forty-seven, for paragraph number  
9 72, this -- this --  
10 Q. Hold on.  
11 A. I'm sorry. "Defendants refused to  
12 allow watchers and representatives to be present  
13 when the required declarations on envelopes  
14 containing official absentee ballots were reviewed  
15 for sufficiency when the ballot envelopes were  
16 opened and when such ballots were counted and  
17 recorded.  
18 "Instead, watchers were denied access  
19 by security personnel in a metal barricade from  
20 the area where the review, opening and counting  
21 were taking place.  
22 "Some of the Trump campaign workers

Page 940

1 were threatened with arrest if" -- if --  
2 Q. Well, read it from the screen.  
3 A. "Some of the Trump campaign watchers  
4 were threatened with arrest it they approached the  
5 counting process area.  
6 "Consequently, it was physically  
7 impossible to view the envelopes or ballots that  
8 laid out the pattern."  
9 Q. And I think you have two more  
10 paragraphs.  
11 A. We had -- two more? Okay.  
12 This is 82, page '82. That would be  
13 the first -- 172. I'm sorry, 172 is the theory of  
14 dilution that we cited, okay.  
15 One seventy-three: "Every voter in a  
16 federal election, whether he votes for a candidate  
17 with little chance of winning or for one with  
18 little chance of losing, has a right under the  
19 Constitution to have his vote fairly counted  
20 without its being distorted by fraudulently cast  
21 votes".  
22 One seventy-four, "Invalid or

Page 941

1 fraudulent votes that base and dilute the way of  
2 each valid vote cast".  
3 And then the final allegation, 175,  
4 "Entered on the free exercise of a right or  
5 privilege impured to him by the laws of the  
6 Constitution of the United States".  
7 That's what we were using fraud before.  
8 I would also add that, at the beginning  
9 of the complaint, we lay out citations from the  
10 International Standards for Elections that say  
11 that it is universally accepted that, to an  
12 observer at an election count, means to be able to  
13 see the documents and examine the specifics, and  
14 that this election would have been cited as a  
15 failure, given the decision of the Supreme Court  
16 of Pennsylvania of failure under international  
17 standards. That's in the first paragraphs of the  
18 complaint, if you want to look at that. And it  
19 seemed to me that was a very powerful argument,  
20 certainly creating a good-faith basis on which to  
21 argue that at some point there might be a court  
22 that would come to that conclusion, that this was

Page 942

1 fraud.  
2 If it violated international standards  
3 that it utilized when we evaluate elections --  
4 if -- if they were to do this in Columbia, and we  
5 were observing the election, we would cite the  
6 election for fraud, if they had excluded observers  
7 who couldn't see the paper and were uniformly  
8 refused in a concerted effort in which violence is  
9 even threatened, and arrest. I can't see how  
10 that's a bad-faith argument.  
11 Q. All right. Thank you, Mr. Giuliani.  
12 A. I certainly didn't say anything untrue.  
13 I didn't -- I don't even think I exaggerated.  
14 This is all supported by affidavits. If you want  
15 me to, we've got the -- I'll pull out the  
16 affidavits that support this.  
17 Q. Thank you.  
18 MR. KAMINS: I have no further  
19 questions, Mr. Chair.  
20 CHAIRMAN BERNIUS: Mr. Fox.  
21  
22 CROSS-EXAMINATION

Page 943

1 ON BEHALF OF RESPONDENT  
2 BY MR. FOX:  
3 Q. I would like to focus first on the  
4 report from Mr. Droz, which is Respondent's  
5 Exhibit 11 and -- I don't know we need to put it  
6 up. But let's -- you -- you refer to two charts  
7 in that.  
8 A. Yes, sir.  
9 Q. Who was the person that put those  
10 charts together?  
11 A. I can only tell you what it says: Mr.  
12 Briggs.  
13 Q. Okay. Before we get to that, as I  
14 understood what your testimony was the other day,  
15 you received the Droz report you believe -- I  
16 think you said in the car on the way to the oral  
17 argument before Judge Brann, correct?  
18 A. No, I -- well, if I did I -- I  
19 corrected it today. I don't think I said that.  
20 I think I said I received it the day  
21 before but I read it in the car.  
22 Q. Oh, I see. I apologize. You read it

Page 944

1 in the car on the way to the oral argument?  
2 A. Yes, sir.  
3 Q. And I think your testimony yesterday  
4 also was that you had drafted the second amended  
5 complaint before the oral argument?  
6 A. I had -- I had put in my contribution  
7 to it I think before the oral argument. I may  
8 have done it even in the car. I don't -- I don't  
9 remember exactly when I did that.  
10 Q. Now --  
11 A. I assume that I -- just given the  
12 timing, I assume that I must have, but it's  
13 possible I did some work on it after.  
14 Q. Now -- to go -- to go back to the --  
15 those two charts that we looked -- that you looked  
16 at -- and we can put them up if you need to -- but  
17 do you know anything about the credentials of the  
18 people that wrote those charts, that drew those  
19 charts up?  
20 A. I do not, except what the -- except  
21 what I just learned.  
22 Q. What you learned today?

Page 945

1 A. Yes.  
2 Q. And did you know anything at all about  
3 the data on which they based those charts?  
4 A. No. I didn't allege anything about  
5 these charts. I -- I used -- it informed my  
6 opinion that this was a screwed up election.  
7 Q. And -- and -- and I was actually going  
8 there, but let's get there right now.  
9 It is fair to say that in -- the facts  
10 that you pled in the complaint, second amended  
11 complaint, and also in your argument before Judge  
12 Brann, you never alluded to any of that  
13 information, did you?  
14 A. Not specifically. I -- I did allude  
15 to -- I'm not sure if we alleged -- if we alleged  
16 dead people voting in the complaint. I don't  
17 think we did, but we may have. But it wasn't  
18 based on this.  
19 Q. Okay. Now, as I understand what --  
20 what you said about those charts, they showed  
21 that, at a certain point in the election, Trump  
22 seemed to be comfortably ahead and then, all of a

Page 946

1 sudden, Biden caught up with him.  
2 Is that -- is that right?  
3 A. Um-um.  
4 What they purport to show is anomalies.  
5 They purport to show things that are statistically  
6 viewed by statisticians as impossible or unlikely.  
7 Q. But -- but the unlikely thing, as I  
8 heard your testimony, was that Trump -- I'm sorry,  
9 Biden could come from so far behind to catch up to  
10 Trump, correct?  
11 A. In a short period of time, yes.  
12 Q. Yeah.  
13 A. And then -- then you -- then you would  
14 offer it as testimony and it could be rebutted.  
15 Q. And -- and -- and you are aware that in  
16 elections, there's something, I think they -- I  
17 don't know whether they call it the "blue wave" or  
18 the "blue crest".  
19 Are you -- you familiar with that term?  
20 A. I'm not but --  
21 Q. You're not familiar with the term?  
22 For example, in -- in most states,

Page 947

1 cities are more democratic than other areas of the  
2 state, correct?  
3 A. Almost always, yes.  
4 Q. Right. And -- and -- and cities,  
5 because they're more populous, it generally takes  
6 longer to count the votes in those jurisdiction,  
7 correct?  
8 A. Not necessarily.  
9 Q. But in -- you would -- you agree that  
10 in Pennsylvania the votes for Philadelphia and  
11 Pittsburgh came in later?  
12 A. To me as a prosecutor, late counting is  
13 always suspicious, but...  
14 Q. And it's also the case, is it not, that  
15 traditionally democrats have been more willing  
16 than republicans to vote by mail or absentee?  
17 A. Well, that's kind of new. I mean, we  
18 didn't have much mail voting until 2020. I mean,  
19 there were 200,000 out of 5M in the election  
20 before, then there were 2M out of 5M.  
21 Q. Well, would you agree --  
22 A. I would say -- may a finish?

Page 948

1 I would say that's a recent -- what  
2 you're saying certainly applies to 2020, where we  
3 have experience with it, and to 2022.  
4 Q. Historically it's --  
5 A. Historically, when we had the  
6 traditional absentee ballot, I don't believe that  
7 was the case.  
8 Q. But it certainly applied in 2020.  
9 You've -- we've agreed about that, correct?  
10 A. It sure seemed that way, yeah. I  
11 mean --  
12 Q. And one of the reasons -- one of the  
13 reasons it applied was because President Trump was  
14 actively discouraging people from voting by mail,  
15 wasn't he?  
16 A. I'm not disputing it, but I don't  
17 remember that.  
18 Q. All right. And you are also aware, are  
19 you not, that in Pennsylvania the law prohibited  
20 the counting of the mail-in ballot until Election  
21 Day?  
22 A. That is true almost everywhere.

Page 949

1 Q. Right.  
2 A. They have changed that subsequently,  
3 but in 2020 that was pretty much true, everywhere.  
4 Q. And it takes longer to count mail-in  
5 ballots than it does that ballots are count --  
6 that are cast in person because you've got to open  
7 the outer envelope, you've got to open -- you've  
8 got to inspect the outer envelope; you've got to  
9 open it; you've got to pass it on; somebody's got  
10 to open the secrecy envelope; they got to flatten  
11 the ballots into a pile; and then they got to be  
12 counted. And it takes longer, doesn't it?  
13 A. Yeah, but not that long. I mean, every  
14 other state did it in a much faster period of time  
15 than this state, and they had the benefit of  
16 excluding any observers. They should have been  
17 able to do it a lot faster since nobody was  
18 looking at them.  
19 MR. FOX: Now, let's go to -- can we  
20 put up exhibits 40 through 43. Let's put up  
21 Exhibit 40 first. Yes, that's right.  
22 BY MR. FOX:

Page 950

1 Q. Now, before we get into Exhibit 40, let  
2 me just say -- make the point that you didn't  
3 rely -- none of this specific information that's  
4 contained in either of these four exhibits was  
5 pled in your complaint or argued before Judge  
6 Brann, correct?  
7 A. No, no, sir. No. As I said, it just  
8 informed my attitude that I was arguing in good  
9 faith that there was a lot of possibilities to  
10 being able to prove that this election was -- was  
11 fraudulent.  
12 And I'll remind you that last night  
13 Georgia counted all of its absentee ballots in one  
14 night.  
15 Q. And this exhibit and the other three  
16 exhibits that Mr. Kerik testified about were not  
17 included in the materials that you produced to us  
18 when we asked for all of the evidence that you had  
19 relied on.  
20 Is that not true?  
21 A. Yes. I didn't know that, but yes.  
22 Yes, the answer is yes.

Page 951

1 Q. And -- and they weren't even included  
2 originally in the exhibits that your lawyers  
3 presented. They surfaced sometime after that.  
4 Isn't that true?  
5 A. Yes. They showed it to me sometime  
6 after and I said -- yeah, I did see them and I  
7 explained it to them I think pretty much the way I  
8 explained it to you.  
9 Q. And I don't see any dates on them. Any  
10 dates on them, to indicate whether they were  
11 prepared?  
12 A. I don't -- I don't -- I don't see any  
13 on that there --  
14 Q. Let's just look at this first one.  
15 Unique Voters Over 112 Years -- Unique Voters Over  
16 112 Years Old. Just take the first one, Mr.  
17 Lorenz, he purports -- it purports that he was  
18 born in 1854.  
19 You see that?  
20 A. Mr. Lorenz -- I see Mr. Lomanaco is the  
21 first one.  
22 Q. Lomanaco, I apologize. I can hardly

Page 952

1 read this, so my -- my fault.  
2 Lomanaco; he purports to be -- it  
3 reports that he was born in 1854, correct?  
4 A. That's what it says, yeah.  
5 Q. And -- and -- I don't know. The  
6 computers weren't all that accurate in 1854.  
7 A. That doesn't mean it wasn't -- I mean,  
8 look -- I know I get ridiculed for this; this  
9 happened to be absolutely true -- Joe Frazier  
10 voted three times in Philadelphia after he died.  
11 Q. Well, we -- we come back -- let's just  
12 stick with Mr. Lomanaco.  
13 A. I have those records if you want to see  
14 them.  
15 Q. How do you suppose -- and if Mr.  
16 Lomanaco had waited until he was a hundred years  
17 old to register to vote, which would have been  
18 1954, it still wouldn't have been recorded in a  
19 computer database, would it?  
20 A. Given the condition of their -- of  
21 their voter records, it would not be impossible.  
22 I -- I have articles here about something like 20%

Page 953

1 of the entries in the voter rolls in the United  
2 States are totally inaccurate.  
3 Q. Do you -- do you remember seeing a  
4 declaration that you had gathered -- and I -- I  
5 don't have it in front of me; I'll have to pull it  
6 out later -- that talked about how there were  
7 many -- many typographical errors in this database  
8 with respect to these birth dates?  
9 A. Well, I -- that many entries, there  
10 must be some typographical errors.  
11 The only point I was making is, with  
12 this many, it was a fruitful ground for us to  
13 further investigate. I saw -- I saw four or five  
14 other documents similar to this about dead people  
15 voting. So, all this did was reinforce my sense  
16 that this was a legitimate case that I was  
17 arguing, (indecipherable), in the case -- in the  
18 light most favorable to my client. That's all.  
19 Q. Okay.  
20 A. I'm not -- I'm not saying -- it may be  
21 all untrue, it probably isn't, and it probably  
22 isn't all true.

Page 954

1 Q. All right.  
2 A. We're going to have to find out.  
3 Q. Do you have any idea how any of these  
4 people voted, whether they voted for Trump or  
5 Biden?  
6 A. I wouldn't -- you'd never know that.  
7 Q. Well the older voters tend to favor  
8 Trump, right?  
9 A. If they voted in Philadelphia -- if  
10 they voted in Philadelphia --  
11 MR. FOX: I'll withdraw that question.  
12 THE WITNESS: Like 86 --  
13 MR. KAMINS: He withdrew it.  
14 BY MR. FOX:  
15 Q. Now, let's look at the next one --  
16 well, no, let's not look at the next one.  
17 We have already agreed you didn't use  
18 these in your pleadings or your arguments. Your  
19 argument -- your case, however, Mr. Giuliani, was  
20 based on -- not on dead people voting. It was  
21 based on the problem -- Notice and Cure and the --  
22 we had -- somebody had a nice term for it.

Page 955

1 Everybody agreed to it and it's now gone out of my  
2 head. The geographical restrictions on the  
3 observers, correct? That's what your case was  
4 based on.  
5 A. That seems very euphemistic, but it was  
6 based on the fact that -- that there was -- many  
7 examples of fraud in the election of which those  
8 would be two, and -- and of course, this is the  
9 complaint, when you -- if it went forward, you  
10 would add to that other things that you  
11 discovered, and one of the things I certainly  
12 anticipated was adding dead people voting,  
13 particularly because of the reputation of  
14 Philadelphia, as I've told you. I could have been  
15 wrong about that but I certainly anticipated it,  
16 and I'm just offering that to show you that I did  
17 that in good faith, not in the way that you've  
18 alleged.  
19 Q. Mr. Giuliani, did you plead that?  
20 A. No, I didn't, because I wasn't at the  
21 stage yet where I was ready to plead it, which I  
22 think shows that I was being responsible.

Page 956

1 Q. You have said several times in the  
2 course of your testimony that what a lawyer does  
3 is plead allegations and not evidence.  
4 Am I quoting you right on that?  
5 A. Correct.  
6 Q. That's not what a lawyer does, is it,  
7 Mr. Giuliani, under Rule 8?  
8 A. "Allegations with reasonable support."  
9 Q. What -- what Rule 8 says is you're  
10 supposed --  
11 A. Mr. Fox, if I may, I think you  
12 abbreviated what I said.  
13 I think I've said -- and if I did it  
14 was only because I abbreviated the remark -- a  
15 lawyer pleads allegations for which he has a  
16 basis, which is what I think I gave you with all  
17 of those affidavits and what I'm trying to give  
18 you with these documents.  
19 Q. All right.  
20 A. I'm trying to show you that I had --  
21 even if you disagree with it -- a reasonable basis  
22 for the allegations, enough so that an advocate,

Page 957

1 who has to view it in the light most favorable to  
2 his client, would allege it. Even with that,  
3 there are certain things I didn't allege, because  
4 I didn't think we met that standard. This is one  
5 of them.  
6 Q. Mr. Giuliani, does not the federal  
7 rules require you to plead facts?  
8 A. Yes. Yeah, but not evidence, facts.  
9 Q. All right. Now, we went -- you just  
10 went through, I think I counted one, two, three --  
11 A. The only -- the only thing I would  
12 amend that to, if you define facts as true, then  
13 of course you can't know that when you alleged it  
14 in a complaint. You're alleging what you know at  
15 the time, you assume it's true, and then you try  
16 to prove it. It's not --  
17 Q. I'm sorry. Are you finished?  
18 A. Yeah, certain people define facts as  
19 true. Certain people define facts as an item of  
20 information. If you mean item of information with  
21 support, that's what you plead.  
22 Q. I think I counted seven paragraphs in

Page 958

1 the second amended complaint about which you've  
2 testified in which you identified facts that you  
3 pled which you believe supported the allegations  
4 that you brought.  
5 Am I correct about that?  
6 A. Well, I think I offered them to say  
7 they're facts that I pled for which I took from  
8 some document or some person that I had support  
9 for.  
10 Q. And would you agree that a number of  
11 the facts that you pled had nothing to do with  
12 Notice and Cure or the geographic location?  
13 For example, the first two paragraphs  
14 that you talked about were -- that you talked  
15 about in your direct testimony, were allegations  
16 that, in certain jurisdictions, there was a  
17 problem with provisional votes.  
18 Now provisional votes are situations  
19 where people have already been given the  
20 opportunity to vote, correct?  
21 A. Provisional voting in this particular  
22 case and in the allegations we made about it are

Page 959

1 people who allege that they didn't vote, that a  
2 vote was entered for them, which would be  
3 fraudulent, and when they showed up at the polling  
4 place -- and the number in Pittsburgh was 17,000.  
5 When they showed up at the polling place, they  
6 were confronted with the fact that they had  
7 already voted. They say they didn't. Many of the  
8 declarations say that. There were -- there are  
9 considerably more people that said that that  
10 aren't even in the declarations. But that was a  
11 common complaint in Pittsburgh and Philadelphia.  
12 People showed up, they wanted to vote, and they  
13 were told, "Oh, you already voted by an absentee  
14 ballot". These people said, "No, we didn't. We  
15 either never got one," or "we never returned one,"  
16 or, "Look, I have one here. It's not -- it's  
17 filled out". Then they were required to vote by a  
18 provisional ballot.  
19 Now some of them -- let me finish --  
20 the allegation is different. I had quantified  
21 them earlier. Some of them they were not  
22 allowed -- they were not allowed to vote. Most of

Page 960

1 them, they were allowed to vote, but many of them  
2 went and checked and their vote was never  
3 registered.  
4 Q. But that was not what you were pleading  
5 in the provisions that you just cited for the  
6 hearing committee, was it?  
7 A. I don't know what you're talking about.  
8 Not pleading -- I was pleading that that was  
9 fraud, and that it was one of the violations of  
10 Due Process and Equal Protection.  
11 MR. KAMINS: Could we - if Mr. Fox is  
12 referring to a specific paragraph, could we have  
13 him --  
14 MR. FOX: I -- I -- yes, could we put  
15 up, please, Disciplinary Counsel's Exhibit 9, page  
16 66, and I believe the two paragraphs that Mr.  
17 Giuliani referred to were 128 and 129.  
18 BY MR. FOX:  
19 Q. Now these -- these -- this doesn't have  
20 anything to do -- neither of these paragraphs have  
21 anything to do with persons who claimed they had  
22 to vote provisionally because the records showed

Page 961

1 they had already cast an absentee ballot,  
2 right?  
3 A. Well, most of the complaint doesn't  
4 have to do with that, just a certain portion of  
5 it. I mean, I don't think I have to allege  
6 everything that I alleged earlier in every single  
7 paragraph.  
8 Q. No, that's not the point, Mr. Giuliani.  
9 A. I never alleged that. This was a  
10 different part of the complaint.  
11 Q. Mr. Giuliani, when I asked you about  
12 provisional voting, you went off into your  
13 explanation about these people who said they had  
14 to vote provisionally because the records showed  
15 they voted by absentee.  
16 Neither of these complaints -- these  
17 paragraphs that you testified about that, do they?  
18 A. No, they don't.  
19 Q. All right. Similarly you -- you  
20 discussed the situation where one individual was  
21 barred as an observer in Philadelphia, correct?  
22 A. I allege many individuals were barred.

Page 962

1 Q. Well, that's on your direct  
2 examination. Did you discuss that?  
3 One of the allegations you talked about  
4 was a single individual who they wouldn't let in  
5 as an a observer, right?  
6 A. No, I didn't. I didn't talk about one  
7 individual that was not let in as an observer.  
8 Q. Page 91.  
9 A. I said there were many.  
10 Q. Page 97, please, paragraph 224.  
11 A. Maybe I don't understand the question,  
12 Mr. Fox.  
13 MR. KAMINS: He's going to put it on  
14 the screen. It's on the screen, 224.  
15 BY MR. FOX:  
16 Q. This is what you testified about on  
17 direct examination, wasn't it; Mr. Gallenthin?  
18 A. Sure, sure but I also --  
19 Q. Well, I'm talking about your direct  
20 examination, sir.  
21 A. I thought you were saying to me I  
22 only -- I only talked about one person in

Page 963

1 Pennsylvania.  
2 Q. Mr. Giuliani, why don't you listen to  
3 my question. I'm asking you what you talked about  
4 on direct examination.  
5 A. Mr. Fox, I am trying to listen to your  
6 question. There is no reason to get --  
7 Q. This is one of the paragraphs that you  
8 cited, correct?  
9 A. Yes, I read that.  
10 Q. And -- and that talks about one person  
11 who says he was denied -- he was credentialed and  
12 was not allowed to be an observer in Philadelphia,  
13 correct?  
14 A. Yes, but he was allowed in the  
15 republican county. He was there to illustrate  
16 several points, including Equal Protection.  
17 Q. And -- and according to you, that's  
18 evidence of fraud?  
19 A. Well, it's a -- it's a fact alleged  
20 which, in combination with other facts, could  
21 allow you to argue for it, yes.  
22 I mean, if -- if this happened one

Page 964

1 time, it would -- no, but if it happened 50 times,  
2 now -- now you have an argument. And we have  
3 considerably more people that weren't allowed to  
4 do it that are alleged -- for -- for example --  
5 for example Jeremy Mercer is another one that I  
6 discussed during my direct examination who wasn't  
7 allowed to do it and then gave us a list of a  
8 number of other people that weren't allowed to do  
9 it.  
10 Q. Jeremy Mercer is the one who the  
11 Pennsylvania Supreme Court said was given -- found  
12 was given an adequate opportunity to observe,  
13 correct?  
14 A. Yeah, his affidavit contradicts that.  
15 That -- that -- that is their conclusion, that  
16 being in the room is an adequate opportunity to  
17 observe.  
18 Jeremy Mercer, if you look at his  
19 affidavit, both of them, says, "I never saw  
20 anything". So that's a dispute as to whether he  
21 did observe.  
22 It's a question of, is it enough that

Page 965

1 you sit in a room like a potted plant and see  
2 nothing relevant, or do you have to see the  
3 identifying data on the document?  
4 Mr. Mercer quite adamantly says, after  
5 four days of begging and pleading and going to  
6 court, he was never allowed to see anything.  
7 That's -- that's -- those are the  
8 facts, Mr. -- Mr. Fox. I'm sorry.  
9 Q. Page 67, paragraph 131. Now this is  
10 the example you talked about where there was  
11 apparently a malfunction in a machine in Delaware  
12 county, and some votes had to be run through the  
13 machine four or five times?  
14 A. Correct.  
15 Q. And -- and it's your testimony that  
16 that's evidence of fraud, this malfunction of  
17 this -- this one machine?  
18 A. I would say not by itself. In  
19 combination with a number of other witnesses that  
20 observed the same thing and who would say that --  
21 that -- that during those episodes, there were  
22 conversations about finding registrations to

Page 966

1 attach the vote to.  
2 So this was sort of a basis for being  
3 able to put four or five witnesses in, if we had  
4 an evidentiary -- evidentiary hearing.  
5 Q. Well, all those facts that you just  
6 added aren't in your complaint, are they?  
7 A. I -- I mean, the complaint would have  
8 been a thousand pages if I put all my facts in.  
9 That's what you have the evidentiary --  
10 evidentiary hearing for.  
11 Q. But presumably we'll find in those 300  
12 declarations, or 100 -- 249, however many there  
13 are, all these other people who had the similar  
14 problems with the malfunctioning counting  
15 machines, correct?  
16 A. You'll find some people in there. I  
17 can give you the numbers, if you want.  
18 Q. Paragraph 132-3, on the same page, 133  
19 this is -- this is a specific example of a -- of a  
20 mail carrier in Erie County who made some  
21 allegations that were in the newspaper.  
22 Do you remember that?

Page 967

1 A. I -- I -- no, I'm sorry, I don't  
2 remember -- I -- now that I read it, I kind of  
3 remember it, yes.  
4 Q. Do you -- do you also remember that he  
5 withdrew the allegations before your complaint was  
6 filed?  
7 A. I do not.  
8 Q. Okay. Let's move on, paragraph 134.  
9 This is the Project Veritas allegation that you  
10 talked about.  
11 A. Correct.  
12 Q. It doesn't say anything about where  
13 these carriers were, even if they were in  
14 Pennsylvania, does it?  
15 A. It does -- that's one -- that's one I  
16 followed up on later and got additional  
17 information. You're correct.  
18 That's all I had at the time when I  
19 alleged that.  
20 Q. Okay, and Project Veritas is a partisan  
21 group, correct?  
22 A. Yes, it is, yeah, but it's a group that

Page 968

1 I found that backs up what they do with -- with  
2 tape recordings, and I found them to be reliable  
3 in the past.  
4 Q. And then I think the next -- I don't  
5 want -- well. The -- the next thing that you  
6 cited was your paragraph 72 on 147.  
7 MR. FOX: We are almost finished, Mr.  
8 Chairman.  
9 THE WITNESS: Yeah.  
10 BY MR. FOX:  
11 Q. Sorry, I probably had the page wrong  
12 here, paragraph 72. I was writing it down  
13 quickly. Paragraph 72 would be on 46, 45 and  
14 46 -- no, I've got it wrong. My apologies.  
15 It's page 72, paragraph 147, okay. I  
16 apologize.  
17 MR. KAMINS: Paragraph 147, look at the  
18 screen.  
19 BY MR. FOX  
20 Q. And this is just -- this is your  
21 observational barrier objection, correct?  
22 A. Yeah, sure. I mean, it would fit under

Page 969

1 that category, yeah.  
2 Q. And -- which you testified and -- and  
3 candidly and commendably said to Judge Brann  
4 applied to democrats as well as republicans?  
5 A. I did but I also pointed out to the  
6 judge that the people counting the votes were  
7 democrats, and it didn't uniformly apply to  
8 democrats.  
9 Q. Aren't the board of elections --  
10 CHAIRMAN BERNIUS: Let him answer the  
11 question.  
12 THE WITNESS: Where there were  
13 exceptions, there were always to democrats, and in  
14 fact there's support for that in the affidavits.  
15 BY MR. FOX:  
16 Q. Aren't the board of elections in  
17 Pennsylvania nonpartisan -- well, strike that,  
18 bipartisan?  
19 A. In Philadelphia?  
20 Q. Bipartisan. Yes, isn't it required  
21 that there be a member of the republican party on  
22 that?

Page 970

1 A. There -- as far as I know, the -- the  
2 people that were doing the counting were described  
3 to me as all democrats. That a wasn't a  
4 republican allowed to do any counting or get near  
5 any votes.  
6 Q. Okay.  
7 A. That -- that's going to come up --  
8 that -- that -- there was no question that the  
9 democrats were counting the votes in Philadelphia,  
10 and always counted votes in Philadelphia.  
11 Q. You know, there may be another  
12 paragraph that you --  
13 A. And the sheriff is a democrat, the one  
14 who excluded Corey Lewandowski, who had a court  
15 order, from which you can draw an inference.  
16 Q. The -- the -- there may be another  
17 paragraph, but if so, I've lost it. So I  
18 apologize.  
19 Are there any other specific facts that  
20 you pled, aside from the ones we just talked  
21 about, that you want to call the hearing  
22 committee's attention to to support your

Page 971

1 allegations that there is this widespread fraud?  
2 A. Yes, but the good judge prevailed upon  
3 me to leave out the whole group I had outlined at  
4 the beginning because they're largely -- the ones  
5 I did are illustrative of the ones I would cite.  
6 Yes, there are a large number of other  
7 facts that I alleged in the complaint, in the  
8 earlier part of the complaint. I have them all  
9 outlined here. But the good judge got me to --  
10 got them down to that group, which probably are  
11 illustrative and made the point that we wanted.  
12 Q. Okay.  
13 MR. FOX: I believe those are all the  
14 questions I had.  
15 CHAIRMAN BERNIUS: Mr. Kamins?  
16 MR. KAMINS: Nothing further, Mr.  
17 Chair.  
18 CHAIRMAN BERNIUS: Anything from the  
19 hearing committee?  
20 MR. BROZOST: Yes, Mr. Bernius,  
21 briefly.  
22 MR. BROZOST: First, by way of

Page 972

1 disclosure, Mr. Giuliani, I -- I must report that  
2 I actually served under you. When you were  
3 Associate Attorney General, I was a lowly trial  
4 attorney in the criminal division.  
5 You described with some specificity  
6 your experience in both criminal and civil cases  
7 during your distinguished career. And I know you  
8 did this I believe yesterday, but again, could you  
9 summarize for me your experience in election law  
10 matters?  
11 THE WITNESS: I -- I never litigated --  
12 let me think carefully, because it's a long time,  
13 and I've tried many things, odd things really.  
14 I've been a plaintiff in election law  
15 matters as a candidate, many times, or maybe a  
16 defendant. I'm not sure. I don't think I've  
17 litigated an election contest. That's for sure.  
18 I may have litigated some campaign finance cases,  
19 like the expert, but I don't think I actually was  
20 trial counsel -- no, I've not been trial counsel  
21 in an election case, to answer your question  
22 simply.

Page 973

1 I mean, I have familiarity with it  
2 because, being a candidate and being involved in  
3 politics, I've been a witness, I've been a  
4 plaintiff, I've been a defendant.  
5 But no, I was not an expert in this at  
6 all and don't pretend to be.  
7 MR. BROZOST: You were designated to  
8 coordinate this effort by the president.  
9 THE WITNESS: Yes, sir. I was -- I was  
10 taught by the judge I clerked for that a lawyer,  
11 you know, has to do many different things. You  
12 got to make yourself an expert, and I think I was  
13 selected because he -- he trusted my skills as a  
14 lawyer and that I would get election law people to  
15 help me, which is what I tried to do, sir.  
16 MR. BROZOST: Okay. This matter was  
17 discussed several times and I'm still a little bit  
18 confused about the drafting of the first  
19 complaint.  
20 What I believe you said today, that you  
21 wanted to draft language for multi-district  
22 litigation, and the quote I wrote down -- and help

Page 974

1 me out to explain this -- is you said, "Let's -- I  
2 wanted to broaden the allegations so we could  
3 include other jurisdictions".  
4 THE WITNESS: Yes, sir.  
5 MR. BROZOST: What does that mean  
6 exactly?  
7 THE WITNESS: What that meant was --  
8 clarify that, because that's sort of like  
9 abbreviated.  
10 What it meant was to put in the  
11 allegations that Mr. Fox is asking about, which  
12 are the allegations of republicans being excluded  
13 virtually uniformly from seeing any paper, because  
14 that was a common allegation that -- that I was  
15 getting from our lawyer in Michigan, our lawyer in  
16 Wisconsin, our lawyer in Arizona -- I'm sorry, not  
17 in Arizona. I got it from other people in  
18 Arizona. Our lawyers in Georgia. Every single  
19 one of those places was almost a mirror image of  
20 what I've described to you about in Philadelphia.  
21 So it was not only me but the lawyers I  
22 discussed it with. Their advice was make sure you

Page 975

1 have those allegations in each one of the  
2 complaints so that, if you get to that stage, you  
3 can go before a circuit court and is say, "Look at  
4 these similar allegations in each one of these  
5 complaints in the states I just mentioned. They  
6 raise the same questions of law and fact. You  
7 should consolidate them into one case". In that,  
8 we would have a better chance of getting to the  
9 Supreme Court if we were able to do that. You  
10 would get an expedited appeal and you would get to  
11 the Supreme Court. That's the advice that I got  
12 very early on. Very early on means the first day  
13 I was involved. I remember discussing it in the  
14 car that we talked about before going back and  
15 forth to Philadelphia.  
16 So what I was pressing for would have  
17 put those allegations in about the republicans  
18 being excluded, because they were so -- you  
19 testified in one place as to all of them, you  
20 would be struck by the similarity of what  
21 happened, including -- and I didn't have it here,  
22 because I -- I didn't have that fact at this

Page 976

1 point, and that is that the vote was cut off in  
2 those jurisdictions, at almost the same time, when  
3 it was supposed to go on all night.  
4 So, if you had those allegations in  
5 each one of the complaints: the Pennsylvania,  
6 complaint, the Michigan complaint. The witnesses  
7 in Detroit that Ms. Bobb was talking about, pretty  
8 much a mirror image of the witnesses in  
9 Philadelphia.  
10 MR. BROZOST: But that -- that wasn't  
11 included in Pennsylvania, the --  
12 THE WITNESS: Pardon me?  
13 MR. BROZOST: That was not included in  
14 Pennsylvania, was it, the cutting off at a certain  
15 hour.  
16 THE WITNESS: No, I said I didn't have  
17 that then at the -- at the time I -- we did this.  
18 I didn't -- I didn't get that fact -- maybe I did  
19 toward the very end and it was too late to put it  
20 in that -- in this complaint, and it was -- really  
21 that developed from our investigation in Georgia  
22 where there was an alleged water main break that

Page 977

1 cut off the vote and there was never a water main.  
2 That was a -- that is a fact that we would show  
3 was not true. They cut off the voting at almost  
4 exactly the same time as they cut off the voting  
5 here, and they threw everyone out. Same thing in  
6 Detroit. They cut off the voting, anticipated.  
7 Republicans were told to leave. Some of them  
8 remained outside, were not allowed back in, and  
9 they counted all night, without any republicans --  
10 even in the words of the -- of the Supreme Court  
11 of Pennsylvania, even in the room. They were just  
12 thrown out of the room completely, and the  
13 counting was done.  
14 So stage one was they weren't allowed  
15 to see any paper. That was during the day. Stage  
16 two was they got thrown out completely and the  
17 county continued without them there.  
18 Those were common facts and at least we  
19 got some of those facts in here. In the other  
20 complaints we had more facts, but then eventually  
21 we weren't getting anywhere in the court with  
22 hearings, so we decided to go to the legislatures

Page 978

1 and see if we could get our witnesses under oath,  
2 as a matter of record, for historical purposes.  
3 MR. BROZOST: Thank you, Mr. Giuliani.  
4 THE WITNESS: You're welcome.  
5 CHAIRMAN BERNIUS: Anything else from  
6 the hearing committee? Ms. Haynesworth-Murrel,  
7 anything?  
8 MS. HAYNESWORTH-MURRELL: Yes.  
9 Mr. Giuliani, I -- I had a question,  
10 and it also was in the line of, what do you mean  
11 about suspending of counting? And I -- I just  
12 heard you answer my colleague's question, however  
13 you went on to say they were "put out of the  
14 room".  
15 THE WITNESS: Yes, sir -- yes, ma'am.  
16 MS. HAYNESWORTH-MURRELL: So was that  
17 republicans put out of the room, the watchers, or  
18 was that everyone?  
19 THE WITNESS: Well, it was a little  
20 different in different places, so --  
21 MS. HAYNESWORTH-MURRELL: And how do  
22 you -- and how do you know?

Page 979

1 THE WITNESS: Oh, just affidavits,  
2 witnesses.  
3 I'll give you an -- an example would  
4 be -- and the standards in different states are  
5 different.  
6 MS. HAYNESWORTH-MURRELL: So only in  
7 Philadelphia, Pennsylvania --  
8 THE WITNESS: In Philadelphia,  
9 Pennsylvania they counted all night, and, as you  
10 see, during the night the vote changed  
11 dramatically. They were not supposed to --  
12 they -- they were not supposed to count all night.  
13 They were supposed to stop -- I mean, they were  
14 supposed to count all night. They took a break,  
15 the republicans left and there were no republicans  
16 there from something like 2:00 in the morning  
17 until something like 11:00 o'clock, 12:00 o'clock  
18 the next day.  
19 In Atlanta --  
20 MS. HAYNESWORTH-MURRELL: Were there  
21 any --  
22 THE WITNESS: In Atlanta, I could tell

Page 980

1 you each one if you want.  
2 MS. HAYNESWORTH-MURRELL: No --  
3 THE WITNESS: In Atlanta --  
4 MS. HAYNESWORTH-MURRELL: No, I was  
5 only interested in Pennsylvania. And -- and I  
6 wanted to have you address whether there were  
7 democratic watchers asked to leave as well.  
8 THE WITNESS: I -- I don't know about  
9 Pennsylvania. I do know in one state everybody  
10 was thrown out. In another state just the  
11 republicans were thrown out. But that -- we're  
12 talking about Michigan and Georgia, and I never --  
13 MS. HAYNESWORTH-MURRELL: But in -- but  
14 in Pennsylvania it was only the republicans that  
15 were thrown out.  
16 Is that what you're stating?  
17 THE WITNESS: What I'm saying is that's  
18 all I know. It could be the democrats were thrown  
19 out, too. I don't know the answer to that.  
20 MS. HAYNESWORTH-MURRELL: Oh, okay.  
21 THE WITNESS: I never -- I never really  
22 had that in this case.

Page 981

1 MS. HAYNESWORTH-MURRELL: I see.  
2 THE WITNESS: Okay. I'm sorry.  
3 MS. HAYNESWORTH-MURRELL: No. And then  
4 you -- most of the questions that I wrote down  
5 have already been answered on redirect.  
6 Thank you.  
7 THE WITNESS: Thank you, ma'am.  
8 CHAIRMAN BERNIUS: Thank you.  
9 Any follow-up from the -- for counsel  
10 for the parties, Mr. Fox, Mr. Kamins?  
11 MR. KAMINS: No. No, Mr. Chair.  
12 (Witness is excused.)  
13 CHAIRMAN BERNIUS: All right. Pursuant  
14 to Board Rule XI.11, the hearing committee is now  
15 charged to convene in executive session to decide  
16 preliminarily whether respondents and Disciplinary  
17 Counsel has proven a violation of any of the  
18 charged disciplinary rules.  
19 MR. KAMINS: Excuse me, Mr. Chair --  
20 CHAIRMAN BERNIUS: I'm sorry?  
21 MR. KAMINS: Sorry, I thought we were  
22 going to have -- have prior to your --

Page 982

1 CHAIRMAN BERNIUS: Well, I haven't -- I  
2 haven't -- I haven't finished what I'm saying.  
3 MR. KAMINS: Okay, sorry.  
4 CHAIRMAN BERNIUS: To -- to help us in  
5 making that determination, we're going to have  
6 oral argument tomorrow, and -- and I can tell you  
7 that the oral argument is going to be akin to an  
8 appellate argument. You should expect to be -- to  
9 address the facts in this case, and you should  
10 expect questioning about the facts.  
11 Mr. Leventhal's indication before that  
12 he intended to read a legal statement or a legal  
13 arguments, that is not going to be helpful. I  
14 suppose I can't keep you from doing that, but if  
15 you -- if you want to do that, we'll hold it off  
16 until the end of the other part of the argument.  
17 Is that -- does everybody understand  
18 what I'm saying? Have I made myself clear?  
19 MR. KAMINS: Yes.  
20 MR. LEVENTHAL: As long as we have the  
21 opportunity to do that, and -- and I -- and if I  
22 can, at the end, I'm going to, you know, work on

Page 983

1 it some more tonight. I will send a copy to both  
2 the panel --  
3 CHAIRMAN BERNIUS: Here's the -- the  
4 other point, Mr. Leventhal, is this: If we are  
5 to -- if we do make a preliminary finding,  
6 nonbinding preliminary finding, then we go on to  
7 the sanctions phase of the hearing with mitigation  
8 and aggravation evidence, if any. That may be a  
9 very quick proceeding. Many, many cases there is  
10 no such evidence ordered -- offered. I don't know  
11 what would happen here.  
12 At the end of that session, whether  
13 it's five minutes or -- or two hours or whatever,  
14 then the parties will have an opportunity and will  
15 be under an obligation to submit proposed findings  
16 of fact and conclusions of law.  
17 So you will have ample opportunity to  
18 present your legal arguments at that time. I'm  
19 just giving you the head's up, and frankly I don't  
20 think it's necessary to get into a lot of law. At  
21 this point it may be counterproductive, unless it  
22 bears directly on some of the factual issues.

Page 984

1 The other thing I want to remind you is  
2 that it is before 5:00 o'clock when we're supposed  
3 to adjourn. You have 11 minutes of free time to  
4 get together with your opposing counsel and decide  
5 what evidence -- evidence -- what exhibits are in,  
6 what exhibits aren't in, and if there's any  
7 disagreement on that, bring it to our attention  
8 when we convene in the morning, because if you  
9 don't do it then, it's too late.

10 And let's -- let's -- unless there's  
11 anything else -- any questions from anybody?

12 MR. LEVENTHAL: I have a question but  
13 I'd like to go off the record.

14 MR. FOX: Well, before we do that --

15 MR. LEVENTHAL: It's not about the  
16 case. It's not about the case.

17 MR. FOX: Before we do that, to the  
18 extent -- and maybe it's not helpful, but to the  
19 extent that it would be helpful to refer to  
20 exhibits in the argument tomorrow, it might be  
21 useful to defer the argument 'till the afternoon  
22 to allow me to -- to allow us to organize it.

Page 985

1 If you don't find that is helpful, then  
2 that's fine. I'm prepared to go ahead. But if  
3 you -- to the extent that I can do it with  
4 exhibits, and that's helpful to the committee, I  
5 would need some time to -- to put those together.

6 MR. LEVENTHAL: All right, can we go  
7 off the record now?

8 CHAIRMAN BERNIUS: I'm sorry?

9 MR. LEVENTHAL: Before you decide that,  
10 I'd like to go off the record as it pertains to  
11 the timing, and it's personal, and we can go back  
12 on the record after, if you want.

13 CHAIRMAN BERNIUS: Okay. We'll --  
14 let's -- all right, we'll wrap up for the day and  
15 then we'll go off the record, Mr. Leventhal will  
16 bring his personal matter to my attention and then  
17 how can we notify the public what time --

18 I was thinking that we would convene  
19 later in the morning, Mr. Fox. Could we do it at  
20 say 11:00 o'clock? Is that --

21 MR. FOX: Would be fine with me.

22 CHAIRMAN BERNIUS: Well, why don't we

Page 986

1 do that. We will adjourn for the evening now and  
2 we'll reconvene at 11:00 o'clock tomorrow morning  
3 for oral argument.

4 THE WITNESS: Before you make your  
5 final decision on that -- before you make a final  
6 decision, can we go off for a second.

7 CHAIRMAN BERNIUS: All right, let's --

8 MS. BORAZZAS: Are you ready for me to  
9 take the Live Stream off?

10 CHAIRMAN BERNIUS: Yes.

11 (Whereupon at 4:54 p.m. the hearing  
12 stood in recess until 11:00 a.m. on Thursday,  
13 December 8, 2022.)

1 CERTIFICATE OF NOTARY PUBLIC  
2 I, KIM M. BRANTLEY, C.S.R., the officer  
3 before whom the foregoing hearing was taken, do  
4 hereby, certify that the proceedings were taken by  
5 me in stenotype and thereafter reduced to  
6 typewriting under my direction; that said hearing  
7 is a true record of the proceedings; that I am  
8 neither counsel for, related to, nor employed by  
9 any of the parties to the action in which this  
10 hearing was taken; and, further, that I am not a  
11 relative or employee of any counsel or attorney  
12 employed by the parties hereto, nor financially or  
13 otherwise interested in the outcome of this  
14 action.

15  
16 \_\_\_\_\_  
17 KIM M. BRANTLEY, C.S.R.  
18 Notary Public in and for  
19 the District of Columbia

20  
21 My commission expires: October 31, 2024  
22

<b>A</b>			
<b>A-117</b> 633:16	<b>achievements</b> 875:11	<b>admits</b> 836:8	<b>ahead</b> 713:10 715:15
<b>a-d-d</b> 731:21	<b>acknowledge</b> 666:5 707:8	<b>admitted</b> 659:17 807:13	726:1 777:14 843:21
<b>a.m</b> 632:2 986:12	<b>acquired</b> 840:14	842:10 920:7,8,13,19	846:21 867:5 907:14,14
<b>abbreviated</b> 839:1	<b>act</b> 641:20 645:21 649:12	<b>admitting</b> 849:1 931:19	907:18 908:18,18
956:12,14 974:9	683:12,13 834:5,7,10	<b>adopted</b> 675:3	945:22 985:2
<b>aberrations</b> 778:17	834:17,21 835:1 927:1	<b>advance</b> 726:8,9	<b>AI</b> 769:5
<b>ability</b> 720:3 747:2	<b>acting</b> 754:12	<b>advantage</b> 754:14	<b>Aidala</b> 634:5,15
<b>able</b> 636:17 663:21	<b>action</b> 926:19 987:9,14	<b>adverse</b> 641:18	<b>airport</b> 741:4 872:8
721:13 744:12,22 746:5	<b>actions</b> 924:6	<b>advice</b> 741:18 898:6	<b>aisle</b> 817:16
756:4 805:17,20 851:7	<b>active</b> 847:2 882:14	974:22 975:11	<b>akin</b> 982:7
871:9 933:20 941:12	<b>actively</b> 948:14	<b>advise</b> 820:12	<b>Al-Qaeda</b> 811:20 865:12
949:17 950:10 966:3	<b>activities</b> 704:20	<b>advisor</b> 739:8 811:18	<b>alchemy</b> 642:15
975:9	<b>actor</b> 713:4 718:7	812:6 877:6	<b>alive</b> 874:9
<b>abnormal</b> 779:5	<b>acts</b> 814:7 924:3 926:20	<b>Advisors</b> 734:8,9,15	<b>allegation</b> 921:3 931:10
<b>abnormality</b> 779:7	<b>actual</b> 794:20 795:4	<b>advocacy</b> 702:21	932:2,16 934:1 935:18
<b>abrogated</b> 688:9	835:17 909:8 912:21	<b>advocate</b> 754:10 791:3	941:3 959:20 967:9
<b>absent</b> 838:14 904:17	<b>Ad</b> 631:3 632:2 633:2	956:22	974:14
<b>absentee</b> 692:1,15 838:14	<b>adamant</b> 838:4,4	<b>Aerospace</b> 754:1	<b>allegations</b> 641:2 642:7
847:8 850:16,21 917:14	<b>adamantly</b> 965:4	<b>affidavit</b> 964:14,19	644:10,13 867:8 899:13
933:9 939:14 947:16	<b>add</b> 731:21 732:20	<b>affidavits</b> 801:2,7,9,14	899:17 925:3 929:6,17
948:6 950:13 959:13	780:10 782:17 785:18	803:6 890:22 919:21	930:20 932:7 935:15
961:1,15	786:2 926:3 938:17	942:14,16 956:17	939:3 956:3,8,15,22
<b>absolute</b> 917:22	941:8 955:10	969:14 979:1	958:3,15,22 962:3
<b>absolutely</b> 796:7 851:7	<b>added</b> 782:22 966:6	<b>affiliated</b> 734:3,7	966:21 967:5 971:1
952:9	<b>adding</b> 782:15 785:14	<b>affiliates</b> 746:18	974:2,11,12 975:1,4,17
<b>abuse</b> 817:1	955:12	<b>affiliation</b> 734:4 758:18	976:4
<b>academic</b> 764:21	<b>addition</b> 701:3 765:12	<b>affirm</b> 733:4 750:17	<b>allege</b> 927:17 932:4
<b>academically</b> 710:22	800:18 908:11 909:14	789:18 810:8	934:12 935:16 945:4
<b>accept</b> 668:18 669:2	909:14 911:17 913:7,12	<b>affirmed</b> 697:8 925:9	957:2,3 959:1 961:5,22
873:19	917:19 937:2 938:10	<b>Affordable</b> 926:19 927:1	<b>alleged</b> 639:1 686:8 923:8
<b>accepted</b> 667:7 719:20	<b>additional</b> 705:18 747:4	<b>Afghanistan</b> 791:4,8	929:13 930:2,10 945:15
941:11	749:12 857:21 967:16	792:4	945:15 955:18 957:13
<b>accepting</b> 667:16 669:9	<b>Additionally</b> 913:9	<b>afoul</b> 659:22 699:4,12	961:6,9 963:19 964:4
669:13	<b>additions</b> 911:1,2	<b>aftermath</b> 812:20 814:5	967:19 971:7 976:22
<b>access</b> 738:20 739:1,16	<b>address</b> 684:3,10 700:4,9	819:22 821:14	<b>allegedly</b> 676:6
739:17 740:7 742:8,22	771:8 818:7 828:18	<b>afternoon</b> 654:16 741:5	<b>alleges</b> 640:3 641:15,16
743:11 744:5,13 745:2	838:21 855:1,21 935:13	821:22 887:1 888:1	642:17,19 925:1 932:1
745:11,14 746:11,19	980:6 982:9	984:21	932:1
747:6,8,14 749:5	<b>addressed</b> 700:10 936:17	<b>agencies</b> 820:10,11	<b>Allegheny</b> 691:12 931:11
828:18 831:8 832:2	<b>addresses</b> 699:19 836:11	<b>agent</b> 824:13	<b>alleging</b> 957:14
837:20 896:4 939:18	936:18,20 937:1,4	<b>agents</b> 818:20,21	<b>alleviate</b> 694:9
<b>accessing</b> 744:7	<b>adds</b> 785:19	<b>aggravation</b> 807:12	<b>allow</b> 648:3 698:16
<b>Accommodation</b> 814:2	<b>adequate</b> 644:7 927:3,21	983:8	723:17 839:1 853:8
<b>accompanied</b> 864:16	964:12,16	<b>ago</b> 697:10 719:20 720:3	939:12 963:21 984:22
<b>account</b> 786:10	<b>adjourn</b> 804:19 984:3	758:21 820:14 840:16	984:22
<b>accountability</b> 816:19	986:1	875:13	<b>allowed</b> 646:12 650:13
871:12	<b>administration</b> 703:18	<b>agree</b> 657:12,17 659:19	738:21 743:8 746:11,18
<b>accuracy</b> 758:22 829:5,8	704:19,20 712:2 725:18	664:19 665:16 668:16	747:8 871:8 873:18
909:10	791:15 812:15 817:12	671:2,7,10,16,22 672:8	882:22,22 883:4 889:6
<b>accurate</b> 744:18 769:11	817:13 834:11 860:15	673:11 676:9 683:20,22	890:14,16 891:1,12,13
787:3 840:17 912:18	861:6 863:11 864:4	694:7 705:1,3 711:14	893:8 909:6,7 913:8
915:21 916:18 929:8	870:8 926:18	773:9 947:9,21 958:10	933:14 934:15 959:22
952:6	<b>admissibility</b> 839:3 842:6	<b>agreed</b> 667:19 673:4,16	959:22 960:1 963:12,14
<b>accurately</b> 930:6,17	<b>admissible</b> 909:3,4	674:18 780:6 871:12	964:3,7,8 965:6 970:4
<b>accused</b> 922:3	<b>admission</b> 772:7	878:15 948:9 954:17	977:8,14
	<b>admit</b> 776:13 777:4	955:1	<b>Allowing</b> 691:21

<p><b>allows</b> 705:17 <b>allude</b> 945:14 <b>alluded</b> 945:12 <b>alternate</b> 687:12 <b>alternative</b> 644:14 <b>amend</b> 643:3 898:18 957:12 <b>amended</b> 645:21 658:7 658:13,19,22 659:11,12 663:1 665:18 667:2,11 667:15,17 668:18 669:2 673:3,8 686:9 700:5 706:19 724:14,17,22 728:11,13 772:14 793:21 898:19 899:2,3 899:5 900:10 921:2 923:5,10 929:11,12 930:21 944:4 945:10 958:1 <b>Amendment</b> 934:9 <b>amendments</b> 651:6,6 <b>America</b> 791:17 793:5 820:7 872:4 873:2 <b>America's</b> 875:8 <b>American</b> 735:11,12 791:19 862:22 873:19 <b>Americans</b> 735:2 <b>amicus</b> 655:17,21 <b>amount</b> 755:10 761:19 776:7 <b>amounted</b> 724:21 <b>ample</b> 983:17 <b>amplify</b> 922:14 <b>analogous</b> 703:4 <b>analogy</b> 703:4 <b>analyses</b> 761:6 <b>analysis</b> 671:7,12,18 672:20 673:14,21 674:1 677:20 679:7 681:4 714:18 759:13 760:11 781:8 909:17 910:16 912:2 917:10 927:7 <b>analyze</b> 671:6 <b>analyzed</b> 922:17 <b>analyzing</b> 715:11 <b>and/or</b> 706:6 <b>Anderson</b> 712:3 <b>Andrew</b> 903:18 933:4,4 <b>announce</b> 821:4 <b>announced</b> 783:12 820:20 821:3 <b>anomalies</b> 769:15,19 771:14 778:17,20 780:5 799:21 936:11 946:4 <b>anomaly</b> 770:7 <b>answer</b> 660:12,16 663:21</p>	<p>714:1,12 758:8,12 766:6 846:19 854:12 914:4 915:5 921:17 950:22 969:10 972:21 978:12 980:19 <b>answered</b> 981:5 <b>answers</b> 780:10 <b>anticipated</b> 649:9,13 650:9 955:12,15 977:6 <b>anticipating</b> 714:4 807:10 <b>antiterrorism</b> 870:3 <b>antitrust</b> 860:10 867:16 <b>anybody</b> 845:7 858:2 930:9,17 984:11 <b>anything's</b> 927:17 <b>anyway</b> 796:21 <b>apartment</b> 735:22 <b>apologies</b> 968:14 <b>apologize</b> 636:15 727:22 780:20 943:22 951:22 968:16 970:18 <b>apparatus</b> 793:1 <b>apparently</b> 678:8 965:11 <b>appeal</b> 649:16 684:1 687:12 689:20 975:10 <b>appeals</b> 631:1,10 637:8 689:4 <b>appear</b> 664:16 792:22 <b>appearance</b> 664:4,17 <b>appearances</b> 633:1 634:1 797:10 <b>appearing</b> 931:19 <b>appears</b> 665:14 680:7 721:2 770:13 797:9 <b>appellate</b> 661:19 688:1 982:8 <b>appended</b> 643:1 <b>applicable</b> 682:7 <b>application</b> 646:9 647:9 663:15 664:8,15 703:1 704:11 776:13 920:11 <b>applied</b> 701:19 926:2,9 948:8,13 969:4 <b>applies</b> 669:21 712:1 948:2 <b>apply</b> 684:22 715:17 969:7 <b>appointed</b> 718:11 757:3 859:19 861:15 884:10 <b>appointment</b> 757:8 <b>appreciate</b> 661:13 777:22 838:21 <b>approach</b> 716:3 805:11 <b>approached</b> 742:21 745:18 940:4</p>	<p><b>approaching</b> 664:10 <b>appropriate</b> 646:5 717:14 771:6 904:6 <b>approximately</b> 778:13 <b>April</b> 638:19 677:19 <b>aquifers</b> 755:16 <b>area</b> 704:2,4 745:8 749:6 753:15 773:17 774:9 811:10 917:15 918:1 933:11,15 936:7 939:20 940:5 <b>areas</b> 703:2 707:21 753:9 754:9 768:20,21 918:19 947:1 <b>arguably</b> 685:9 <b>argue</b> 680:15 681:7 687:5 704:21 711:21 902:1 939:7 941:21 963:21 <b>argued</b> 637:7 659:16 684:19,20 685:4 722:13 863:17 866:8,12 950:5 <b>argues</b> 702:8 <b>arguing</b> 665:14 681:12 690:16 696:12 701:15 701:17 720:21 722:20 723:3,19 905:19 950:8 953:17 <b>argument</b> 639:12 663:17 663:22 664:6 665:3,21 668:2,6 669:22 670:1,4 670:6,19 671:1,2,3,10 671:14,16,20 672:1,4 672:10,12 675:14 678:16 679:5 680:8,20 686:3,12 688:8 689:5 689:17 690:7 691:11 692:19 693:15,18 694:13 695:5 696:9 697:2,4,12,14,19,21 698:12 699:19,20 700:13,15,15,17 703:20 704:22 705:4 719:5,12 720:19,20 772:12 898:22 902:2 905:7,15 913:22 916:8 917:10,17 929:4 941:19 942:10 943:17 944:1,5,7 945:11 954:19 964:2 982:6,7,8,16 984:20,21 986:3 <b>arguments</b> 668:15,20 669:5 674:22 708:22 709:12 717:18 719:3 720:15,18 721:11,17 722:2,3 723:8,12 914:18 954:18 982:13</p>	<p>983:18 <b>arithmetic</b> 782:16 <b>Arizona</b> 652:6 720:3,6 725:21 797:21,21 798:2 802:11 823:18 854:9 899:21 974:16,17,18 <b>Arlington</b> 793:14 798:21 799:1 802:6 822:7,8,9 822:14 833:6,16,17 879:19 901:7 <b>arm</b> 924:3 <b>armed</b> 738:18 818:22 <b>arrangements</b> 880:7 <b>arrest</b> 940:1,4 942:9 <b>arrival</b> 738:9,14 744:21 <b>arrive</b> 741:22 793:18 <b>arrived</b> 736:18 737:7 794:5 823:15 882:20 933:8 935:13 <b>arriving</b> 736:19 742:9 <b>article</b> 879:1 925:15,18 926:4 <b>articles</b> 654:19 775:21 952:22 <b>articulated</b> 718:15 <b>artificial</b> 769:4 <b>ascertain</b> 727:20 758:20 758:21 <b>ascribed</b> 678:14 679:3 <b>aside</b> 970:20 <b>asked</b> 665:22 667:5 668:12 672:15 699:4 706:22 708:3,8,12,14 726:2 727:15 728:5 736:1 737:5 741:22 742:7,22 743:1,3 760:9 772:22 785:11 832:16 862:1 870:7 878:11,12 880:21 882:17 883:21 884:1 885:4 891:3 892:9 896:22 897:3 903:13 912:16 922:8 929:10 950:18 961:11 980:7 <b>asking</b> 726:22 759:12 843:4 895:17 963:3 974:11 <b>aspect</b> 791:12 <b>assemble</b> 892:4 <b>assembled</b> 893:20 <b>asserting</b> 644:16 <b>assertion</b> 924:20 <b>assess</b> 717:15 777:9 <b>assessment</b> 769:11 <b>assessments</b> 812:2 <b>assigned</b> 769:12 813:7</p>
---	--	---	--

<p><b>assignment</b> 760:19 762:21 763:12 <b>assist</b> 822:2 824:10 <b>assistance</b> 741:13,15 793:9 811:7 <b>assistant</b> 633:15 861:20 893:5 912:4 <b>associate</b> 766:20 859:11 859:14 861:14 862:1 885:8 900:17 972:3 <b>associates</b> 872:10 <b>association</b> 775:5 818:5 820:13 890:6 <b>associational</b> 684:21 <b>assume</b> 715:3 716:10 723:12 727:17 728:13 731:2 732:1 927:11 944:11,12 957:15 <b>assumed</b> 915:22 925:9 937:11 <b>assuming</b> 706:4 <b>assure</b> 713:5 855:13 930:8 <b>assured</b> 718:8 <b>AT&amp;T</b> 867:15 <b>Athenian</b> 873:4 <b>Atlanta</b> 908:8 979:19,22 980:3 <b>atmosphere</b> 901:12,17 <b>attach</b> 966:1 <b>attack</b> 645:12 726:8 869:9 <b>attacked</b> 820:8 <b>attempt</b> 702:22 <b>attempted</b> 739:13 742:13 871:14 <b>attempting</b> 636:7 675:1,5 676:21 769:18 780:12 780:13 <b>attended</b> 735:13 <b>attention</b> 768:6 868:21 874:18 970:22 984:7 985:16 <b>attesting</b> 647:18 <b>attitude</b> 950:8 <b>attorney</b> 633:8,10 634:22 647:14,15,17 648:7,10 655:7 657:17 659:22 670:22 671:5,19,22 672:3,9,11 688:21 697:11 738:1 742:6 758:14 760:21 761:12 790:13 793:9 799:13 859:11,14 860:19,20 861:12,14,17,21 862:2 862:3 863:20,22 864:18</p>	<p>865:13 866:5 867:2 869:13,14,19,20 878:5 882:13 972:3,4 987:11 <b>attorney's</b> 661:9 670:16 815:8 <b>attorneys</b> 657:13 662:18 663:2,16 664:21 681:1 702:22 792:20 795:5 796:13 798:4,19,20 799:7 800:9,10 822:16 832:22 833:17 860:3,7 860:12 863:18 <b>audit</b> 781:19,21,22 782:2 782:6,7,9 783:6,13,19 785:12,14,18,22 786:3 786:5,7,8,10 <b>audited</b> 781:16 <b>auditing</b> 936:15 <b>audits</b> 774:18,20 782:5 786:8,12,16 <b>Austin</b> 767:17 <b>authenticity</b> 837:10 <b>author</b> 765:8 774:16,17 <b>authored</b> 756:11 <b>authority</b> 640:11 641:19 660:7,14 681:13 701:5 701:7 <b>authorized</b> 745:5 <b>authors</b> 767:10,11 779:11 784:12 <b>available</b> 704:22 755:10 775:19 840:10 <b>Avenue</b> 634:6 844:17 <b>average</b> 754:15 <b>avid</b> 820:1 <b>avoid</b> 642:7 <b>Award</b> 865:13 875:11 <b>awarded</b> 873:22 <b>awards</b> 813:11,13,14,18 863:3 869:2 873:11,12 875:3,6,15 <b>aware</b> 651:19 677:15,16 729:11 777:18 782:1,8 782:10,11,18 783:5,8 783:10,13,18,20 784:19 802:9 803:8 805:12 853:2 936:21 946:15 948:18 <b>awful</b> 896:17 <b>AZADEH</b> 634:11</p> <hr/> <p style="text-align: center;"><b>B</b></p> <hr/> <p><b>Bachelor's</b> 790:18 <b>back</b> 638:19 645:14 675:17 676:15,19 677:13 678:1 680:3,11</p>	<p>714:5,6 732:3 735:4 739:19 745:16 749:11 758:7 760:22 765:7,10 770:4 785:20 818:8 821:19 822:1 831:4 836:16 838:9,10 871:3 878:15 880:5 881:8,9 883:6 885:15 897:16,17 908:15 912:20 944:14 952:11 975:14 977:8 985:11 <b>background</b> 636:16 874:17 <b>backs</b> 968:1 <b>bad</b> 661:4,5,11 688:10,12 688:13 689:22 871:9,18 <b>bad-faith</b> 942:10 <b>balance</b> 961:1 <b>balancing</b> 712:4 <b>ball</b> 777:13 <b>ballot</b> 640:19 642:18 676:7 685:10 692:15 694:6 850:21 852:13 853:4 883:1 933:20 936:15,18 939:15 948:6 948:20 959:14,18 961:1 <b>ballots</b> 646:6,13 690:18 692:2 706:10 747:17 748:4 782:12 831:2,3 832:6 838:15,15,16 847:8,9 849:14,18 883:13 891:1,10,19,21 892:1 916:5 917:14 918:16,18 931:15,22 933:9 935:9 936:12,17 936:22 937:2 938:8,13 939:14,16 940:7 949:5 949:5,11 950:13 <b>ballpark</b> 658:15 <b>Ban</b> 926:17 <b>bar</b> 631:9,11 806:2 <b>barred</b> 686:13 687:6 873:20 933:10 934:5 961:21,22 <b>barricade</b> 939:19 <b>barrier</b> 747:9 968:21 <b>barriers</b> 883:3 <b>BARRY</b> 634:4 <b>base</b> 823:6 941:1 <b>based</b> 664:19 667:22 673:7 679:18 680:6 682:2 684:16 685:11 772:2 777:10 893:2 918:16 920:3 928:16 936:19 945:3,18 954:20 954:21 955:4,6</p>	<p><b>bases</b> 668:2,5 679:21 723:6 <b>basic</b> 785:17 <b>basically</b> 643:11 644:9 648:7 670:8 720:14 730:19 785:14 793:6 796:12 797:5 818:6 823:13 824:6 830:22 850:17 877:8,17 878:11 881:1 890:12 891:15 908:17 910:16 914:12 927:2 <b>basis</b> 646:13 653:5,9,13 653:18 654:1 669:4 671:19 672:3,12 674:15 678:16 679:5,9,13 680:7 685:20,21 686:3 686:15 692:20 698:11 706:5,17 847:16 861:2 921:5 941:20 956:16,21 966:2 <b>battle</b> 813:20 <b>bears</b> 983:22 <b>bed</b> 907:17 <b>began</b> 742:17 872:2 876:8,17 897:16 <b>begging</b> 965:5 <b>beginning</b> 641:12 662:5 710:16 877:3 901:19 908:2 912:2 941:8 971:4 <b>begins</b> 641:14 <b>behalf</b> 632:5 633:10 634:2 637:2 654:11 664:17 708:1 727:2 729:9 733:14,18 751:5 751:9 780:22 785:9 790:5,9 810:15 821:18 842:18 859:6 943:1 <b>beings</b> 835:17 <b>believe</b> 645:9,18 646:20 649:8 650:2,6,8,12 652:13,16 655:21 659:3 659:7,13 661:2 664:7 666:8 675:15 677:4 680:19 682:9 687:21 690:21 696:10 697:9 701:9,13,20 703:14 704:3 705:15 709:18 710:19,22 711:8 724:6 724:11,15,15,16 725:6 726:4 732:20 737:2,14 740:13 741:5,8,21 742:10 744:11,16,18 746:2 747:5 748:3,17 748:20 767:18 776:6</p>
--	--	---	---

793:15 797:17 816:6 839:22 840:6,8 845:2 845:21 847:14 848:7 849:5,16 863:20 868:3 869:16 877:18,22 889:15,15 902:9 919:10 929:16 943:15 948:6 958:3 960:16 971:13 972:8 973:20 <b>believed</b> 921:3 <b>believes</b> 754:15 <b>Ben</b> 676:17 <b>benefit</b> 949:15 <b>Bernard</b> 635:11 810:3,19 <b>Bernie</b> 800:3,14 874:11 902:18,18 903:5,6,11 904:2 <b>Bernie's</b> 902:19 <b>Bernius</b> 633:3 636:2,13 654:8 682:18,21 707:20 710:9,13 711:11,13,18 712:10,14,16,19 713:9 713:20 714:3,8,10 715:2,15 716:1,13 717:6,13 718:9 719:15 719:17 720:22 722:4,14 724:1,3 726:14,18 727:9,13,17 728:17,20 729:3 731:2,5,8,13 732:9,14 733:3,9 749:19,22 750:2,13,16 750:22 751:22 770:22 771:5,12,17,20 772:19 773:9,20 774:3 776:22 777:19 780:8,17 785:6 787:8,10,13,16,21 788:2,8,15,18 789:3,17 790:1 801:22 802:20 803:1,5,16,20 804:1,6 804:10,15,18,22 805:5 805:22 806:5,17,22 807:8 808:1 809:4,9,12 809:16,20,22 810:4,7 810:12 818:15 835:11 836:13 837:11 838:20 839:9,17 842:7,12 843:11 846:7,9 847:18 848:21 849:19,22 850:4 852:20 853:8,19 854:22 857:1,4,18,20 858:1,5 858:10 859:3 904:5,11 904:16,20 905:4 914:21 915:4 920:5,12,18 942:20 969:10 971:15 971:18,20 978:5 981:8 981:13,20 982:1,4	983:3 985:8,13,22 986:7,10 <b>Bertuna</b> 634:5,15 <b>best</b> 694:10 719:1,11,12 722:2 723:12 742:5 746:10,17 764:2,11 865:3 892:18,20 929:7 <b>better</b> 786:19 830:7 871:2 873:3,7 887:16 975:8 <b>beyond</b> 673:1 675:9 690:2 <b>Biaggi</b> 864:9 <b>Biden</b> 642:21 691:5 762:11 779:8 784:8 879:6 908:2,18 910:19 911:4 933:21 946:1,9 954:5 <b>Biden's</b> 911:8 <b>big</b> 795:7 822:21 872:6 879:1 <b>bigger</b> 830:6 837:3,4 842:16 896:6 <b>Biggs</b> 906:14,19 <b>bike</b> 745:12,12 747:8,12 747:15 748:2 <b>Bill</b> 740:4 861:4 <b>bipartisan</b> 969:18,20 <b>birth</b> 840:7 855:20 856:7 953:8 <b>bit</b> 672:6 713:16 722:5 724:10,19 725:8 736:14 795:14 835:14 912:3 917:11 973:17 <b>blacked</b> 844:21 <b>Blakey</b> 860:22 <b>blessed</b> 862:18,19 <b>blocked</b> 845:3 <b>blog</b> 756:18 757:22 <b>blogs</b> 756:16 <b>Bloomberg</b> 872:18 <b>blow</b> 727:18 784:11 <b>blue</b> 758:13 908:1 946:17 946:18 <b>board</b> 631:2,5 640:4 694:21 695:17 776:3 969:9,16 981:14 <b>Bobb</b> 635:10 787:19 789:7,9,16,17 790:4,11 798:18 802:3 803:1 804:1,4,7 833:21,22 912:8,9 976:7 <b>Boesky</b> 865:2 <b>Bognet</b> 638:14 686:13,16 686:17 687:7,11,15,21 689:4,8,17 690:1	<b>bolts</b> 703:17 <b>Bondi</b> 737:20 738:1 743:22 744:3 882:8,12 <b>Boockvar</b> 693:20 694:4 876:2 928:7 <b>book</b> 819:6,8,9,10 <b>books</b> 756:9,10 <b>Borazzas</b> 634:21 731:15 731:20 732:1,6,7,11,19 732:22 750:8,11 751:19 752:10 788:1,12 789:8 808:4 809:17 810:2 905:1 986:8 <b>bore</b> 934:13 <b>Boris</b> 833:20 834:2,2 884:7 886:8 893:21 908:15 <b>born</b> 840:21 951:18 952:3 <b>boss</b> 862:2 <b>Boston</b> 753:8 <b>bother</b> 667:9 <b>bottling</b> 755:16 <b>bottom</b> 722:1 756:3 765:11 <b>boundaries</b> 653:19 700:17 701:1,22 702:16 703:13 704:10,15 705:5 720:5 <b>boundary</b> 690:11 699:20 704:4 <b>Brady</b> 729:19 <b>branch</b> 694:15 695:7 <b>Brann</b> 649:5 650:9,11 660:3 663:10,14,19 665:22 666:5,15,19 667:1,8 668:4,18 669:2 673:15,20 674:3 675:1 675:3,21 676:2,22 678:14 679:2 680:13 681:5 682:4 686:11 694:19 695:13,14 696:7 696:15 698:9 700:13,18 706:7 708:12,15 709:11 899:1 943:17 945:12 950:6 969:3 <b>Brann's</b> 637:5 661:22 662:6 667:16,19 668:11 669:7,11 673:3,5,9,12 674:18 675:9 709:4 <b>Brantley</b> 631:22 632:3 987:2,16 <b>break</b> 636:18 731:9 763:20 904:6,7,21 976:22 979:14 <b>breaking</b> 714:4	<b>breakout</b> 732:12 788:13 808:4 905:1 <b>bribes</b> 864:5 <b>brief</b> 655:21 825:13 <b>briefed</b> 817:3 <b>briefly</b> 724:4 799:4 839:11 859:9 862:10 867:20 873:10 971:21 <b>Briggs</b> 767:17 907:2 943:12 <b>bring</b> 683:11 768:6 984:7 985:16 <b>broad</b> 678:12,22 <b>broaden</b> 899:13 974:2 <b>broader</b> 675:2 <b>broadly</b> 712:21 713:1 <b>Bronx</b> 815:8 <b>brought</b> 641:2 645:13,15 645:16,18 646:9 675:15 675:19 709:1,12 725:22 815:1 864:12 866:9,11 879:22 880:19 886:5,5 886:7,7,8,12 903:22,22 958:4 <b>Brown</b> 682:4 844:8 <b>Brozost</b> 633:7 724:2,3 725:3,10 726:13,22 728:5 749:21 802:2,3 802:19,21,22 971:20,22 973:7,16 974:5 976:10 976:13 978:3 <b>Bruce</b> 799:12 <b>BS</b> 752:22 753:1,7,7 <b>Buchanan</b> 863:10 <b>Buck</b> 933:18 <b>Bucks</b> 933:21 <b>budget</b> 868:11,15,16 874:21 <b>building</b> 755:19 <b>built</b> 811:18 <b>bunch</b> 824:18 829:14 830:11 831:1 856:2 918:2,2 <b>Bureau</b> 860:5 <b>Burwell</b> 926:21 <b>bush</b> 692:22 693:6,14 699:2,5 710:20 711:3,4 712:10 713:12 717:15 717:17,21 718:2,5,15 812:14 814:14 864:20 867:4 870:7 883:10 888:7,8 <b>business</b> 790:19
<hr/> <b>C</b> <hr/>			
<b>C</b> 633:3 636:1			

<p><b>C.S.R</b> 631:22 987:2,16 <b>calculated</b> 652:22 <b>California</b> 854:10 <b>call</b> 636:11 702:17 732:15 735:22 740:2,17 756:18 759:18 760:22 762:17 789:4,6,7 799:20 809:12,20 858:10,14,21 876:10 882:1,7 932:17 946:17 970:21 <b>called</b> 638:13 644:1,5 645:2 655:22 715:5 733:14 741:1 751:5 756:19 757:14 758:14 760:7 761:12 775:16 790:5 811:1 816:13 817:13 819:11 821:16 821:22 872:7 874:8 879:21 880:1 885:15 888:8,8 <b>calling</b> 642:21 741:13 757:22 759:5 775:2 <b>calls</b> 739:21 823:9 <b>camera's</b> 809:17 <b>camp</b> 863:16 <b>campaign</b> 638:21 639:5 640:11,13 641:2,17,19 642:6,14,17,20,21 655:1,13 685:2,7 701:4 701:6 717:9,17,19 734:22 736:20,22 737:6 737:9 738:9,16,21 739:7,9,19 740:3,4 741:16 742:1,6,8 746:19 749:11 790:14 791:1,18 792:11,22 793:16 794:14,21 796:14,14 797:1 820:17 821:11 822:6,13,14,16 822:17 823:12,13,22 824:18 829:12 834:20 878:12 879:9,17 880:7 880:13,15,16 882:15 887:3 888:3,3 890:15 890:17,20 892:5 896:2 896:19 924:8 933:17,21 939:22 940:3 972:18 <b>campaigned</b> 821:5 <b>campaigns</b> 734:18 812:5 812:7 821:8 <b>candidate</b> 656:7,12,19 657:9 675:8 676:4 677:12 685:9 691:5 734:22 923:15,22 924:2 924:22,22 940:16 972:15 973:2</p>	<p><b>candidate's</b> 675:11 <b>candidates</b> 682:11 692:3 699:21 734:17 <b>candidly</b> 836:8 969:3 <b>Cannon</b> 885:19 889:6,9 <b>Canon</b> 746:13 <b>Canon's</b> 746:11 <b>canvass</b> 725:19 <b>canvassing</b> 640:20 699:22 <b>capacious</b> 685:6 <b>capacity</b> 770:12,14 813:1 813:1 <b>capita</b> 870:18 <b>car</b> 886:18 893:17 898:14 898:16 943:16,21 944:1 944:8 975:14 <b>Care</b> 926:19 927:1 <b>career</b> 755:2 814:7 861:21 864:9 883:7 972:7 <b>careful</b> 779:11 <b>carefully</b> 972:12 <b>Carolina</b> 757:4 767:15 775:15 <b>Carolyn</b> 633:5 662:12 <b>carrier</b> 936:13,20 966:20 <b>carrier's</b> 936:19 <b>carriers</b> 936:9,9,10 938:7 967:13 <b>cartels</b> 865:6,6 <b>Carter-Baker</b> 930:3 <b>case</b> 635:2,6 637:6 638:13,17 639:3,5 643:9 644:1,3,4,5 645:2 645:5,16,17 646:17,21 647:4 649:4,5,9 650:17 650:19 656:3 658:1 660:19 662:7,9 663:12 664:22 665:10 666:7,10 666:12 668:13 673:16 674:2,11 676:17,18,18 677:5,6,14 680:8,9,15 680:15 681:7,21 684:18 685:11,22 686:8 687:10 691:16 692:9 693:5 694:4,14 695:6 697:17 698:1,15,15 702:15,16 708:5 715:11 716:6,8 716:18 718:4,13 720:2 721:15,19 723:13,17 725:14 726:10 731:12 780:11 784:7 795:3 799:8 816:8 830:17 847:1 863:8,21 864:1,2 864:12 866:9,12 881:8</p>	<p>894:9 896:6,9,11 897:10,15 898:7,10 902:4 905:19 912:5 914:2 919:18 922:18 926:18,20,20,21,22 933:2 947:14 948:7 953:16,17 954:19 955:3 958:22 972:21 975:7 980:22 982:9 984:16,16 <b>cases</b> 639:7 652:18,21 653:1 655:11,13,16,16 675:6 676:1,12,16,22 676:22 677:1,19,20 678:2 684:9 691:12 702:8 703:15 704:14 712:2 714:18 717:2 725:15,20,21 726:4,9 730:5 802:7,17,18 850:18 851:13,13 862:12 863:6,17,19 867:16 896:19 909:4,5 912:20 913:10 926:11 926:16 972:6,18 983:9 <b>cash</b> 814:20 <b>cast</b> 642:18 912:21 940:20 941:2 949:6 961:1 <b>casting</b> 850:19 <b>casually</b> 907:20 <b>catch</b> 946:9 <b>categorically</b> 723:7 <b>category</b> 675:16 838:8 969:1 <b>caught</b> 946:1 <b>cause</b> 680:3 <b>causes</b> 639:1 <b>cautioning</b> 710:21 <b>caveat</b> 713:2 <b>cavernous</b> 745:8,14 <b>cemeteries</b> 848:11 <b>center</b> 738:6,11,14,17 739:4,19 740:1,7 742:9 742:10,14,18,20 744:13 744:21 748:1,22 812:1 869:10 882:21 886:22 887:19,21 888:5,12 896:1 933:8,13 <b>central</b> 718:7 <b>Centre</b> 931:17 <b>CEO</b> 734:13 811:4 <b>cert</b> 649:16 689:21 <b>certain</b> 690:16 725:1 728:14 755:4 768:20 778:22 783:11 835:6 909:3 945:21 957:3,18 957:19 958:16 961:4</p>	<p>976:14 <b>certainly</b> 649:14 650:9 665:1,14,20 667:8 673:19 677:19 680:2,3 680:6 681:12 686:2 687:14 688:11,19 689:3 689:9 690:3 696:15 699:1,14,15 701:20 707:13 709:14 718:6 721:20 722:19 723:11 769:20 777:15 917:17 927:17 928:19 929:6 930:9,16 934:15 937:8 941:20 942:12 948:2,8 955:11,15 <b>CERTIFICATE</b> 987:1 <b>certificates</b> 841:5 <b>certify</b> 664:11 987:4 <b>certiorari</b> 646:17 <b>cetera</b> 758:22 759:1 775:22,22,22 781:11 817:19 823:9,10 924:8 924:9,9 <b>chads</b> 883:11 <b>chair</b> 633:4 636:6 654:9 710:12 716:14 717:1 727:6 728:19 729:1 731:14 733:11 751:2 772:10,22 773:15 776:12 780:15 789:5 801:20 805:4,16 807:20 818:11 832:19 835:8 843:10 854:13 858:21 920:2,21 922:8 929:15 942:19 971:17 981:11 981:19 <b>Chair's</b> 716:15 <b>chaired</b> 860:22 <b>Chairman</b> 636:2,13 654:8 682:18,21 707:20 710:9,13 711:11,13,18 712:10,14,16,19 713:9 713:20 714:3,8,10 715:2,15 716:1,13 717:6,13 718:9 719:15 719:17 720:22 722:4,14 724:1 726:14,18 727:9 727:13,17 728:17,20 729:3 731:2,5,8,13 732:9,14 733:3,9 749:19,21,22 750:2,13 750:16,22 751:22 770:22 771:5,12,17,20 772:19 773:9,20 774:3 776:22 777:19 780:8,17 785:6 787:8,10,13,16</p>
--	---	---	---

787:21 788:2,8,15,18 789:3,17 790:1 801:22 802:20 803:1,5,16,20 804:1,6,10,15,18,22 805:5,22 806:5,17,22 807:8 808:1 809:4,9,12 809:16,20,22 810:4,7 810:12 818:15 835:11 836:13 837:11 838:20 839:9,17 842:7,12 843:11 846:7,9 847:18 848:21 849:19,22 850:4 852:20 853:8,19 854:22 857:1,4,18,20 858:1,5,8 858:10 859:3 904:5,11 904:16,20 905:4 914:21 915:4 920:5,12,18 942:20 968:8 969:10 971:15,18 978:5 981:8 981:13,20 982:1,4 983:3 985:8,13,22 986:7,10 <b>challenge</b> 657:18 676:5 685:9 763:1 <b>challenged</b> 638:2 690:9 <b>challenges</b> 762:22 881:10 881:12 <b>challenging</b> 656:18 657:1 675:10,10 677:11 703:17 715:7 <b>chance</b> 659:21 806:10 826:2 903:10 940:17,18 975:8 <b>change</b> 679:3,6,7,17 753:17 807:17 871:11 908:17 926:20 <b>changed</b> 729:13,21 872:11,20 907:13 917:11 949:2 979:10 <b>changes</b> 881:12 <b>changing</b> 871:15 <b>channel</b> 751:20 <b>chaos</b> 711:5 797:15 <b>chaotic</b> 662:7 794:12,21 795:20 796:19 800:7 823:15 892:10,18 901:20 902:3 <b>chapter</b> 767:11,12,12 768:12,13 779:2 <b>chapters</b> 765:15,17 766:1 767:16 <b>characterization</b> 800:21 <b>charge</b> 746:3 860:17 903:18 <b>charged</b> 815:3,17 981:15 981:18	<b>Charges</b> 805:15 <b>Charles</b> 844:8 <b>charting</b> 795:8 <b>charts</b> 912:12 943:6,10 944:15,18,19 945:3,5 945:20 <b>check</b> 844:20 845:7 851:7 892:22 908:15 912:16 <b>check-in</b> 744:22 <b>checked</b> 783:4 960:2 <b>Chicago</b> 870:4,6 <b>chief</b> 813:2 884:19 912:4 <b>child</b> 866:7 868:18,19 <b>chilled</b> 702:22 <b>Chirac</b> 875:7 <b>choice</b> 861:22 <b>chose</b> 746:6 <b>Christiani</b> 886:14 <b>Christina</b> 635:10 787:18 789:7,9 790:4 833:22 894:5 912:5 <b>circuit</b> 637:8,17,18 638:1 638:11 639:15,22 640:22 643:14 644:18 646:4 649:16 650:14 661:18 675:6,18 676:3 676:12,22 677:1,17 678:4,8,11,20,22 679:12 680:9,10,15,15 680:17 681:7,8 684:1 689:11,12 701:5,6,12 777:1 866:13,14 975:3 <b>Circuit's</b> 683:15 687:7 700:20 <b>circuits</b> 679:22 <b>circumstance</b> 766:19 <b>circumstances</b> 648:3,13 648:14 661:4 718:6 721:6,6 740:12 748:22 773:13 805:6 <b>citation</b> 643:22 <b>citations</b> 941:9 <b>cite</b> 684:8 925:11 930:20 942:5 971:5 <b>cited</b> 638:20 640:20 652:15 675:6 676:12,22 680:16 681:20 921:13 940:14 941:14 960:5 963:8 968:6 <b>cites</b> 640:11 641:19 701:4 701:6 <b>cities</b> 862:18 947:1,4 <b>citing</b> 692:4 <b>citizen</b> 754:15 768:12 783:3 873:19 <b>citizenship</b> 873:18	<b>city</b> 737:9 767:18 810:21 812:18,21 821:1 864:5 867:1 868:11,14 869:16 869:22 870:4 871:6 872:5 873:2,7 874:7,21 933:8,10 <b>civil</b> 643:5,6 647:11 655:10 683:12 702:7 860:8 867:16,19 934:9 934:10 972:6 <b>civilian</b> 791:10 <b>civilly</b> 932:19 <b>claim</b> 637:19 640:14 643:11,13 653:6 679:10 685:6 687:22 690:3 691:1 700:9 701:21 702:20 703:6,17,19 705:19 706:1,6,9 722:18,20 922:6 933:1 <b>claimed</b> 653:14 899:22 960:21 <b>claiming</b> 685:20 699:16 754:12 <b>claims</b> 642:13,14 653:10 683:11 686:20 687:6 705:13,18 706:2 718:2 718:19 <b>clarify</b> 776:2 974:8 <b>clarifying</b> 724:4 <b>Clark</b> 740:5 <b>clause</b> 637:19 638:11 639:9 640:7 686:20 687:22 700:22 701:19 703:1 718:20 826:20 <b>clear</b> 687:10 688:17 689:10,12 724:20 796:21 807:7 835:16 982:18 <b>cleared</b> 793:5 <b>clearly</b> 684:13 698:7 700:12 704:1 748:2 931:22 <b>clemency</b> 816:9 <b>clerked</b> 973:10 <b>Cleta</b> 775:4 <b>client</b> 656:11,12,17,18,22 657:1,4,5,8,9,13 718:10 718:11 719:1 953:18 957:2 <b>climate</b> 753:16 758:4 926:20 <b>Clinton</b> 861:4,6 879:5 <b>close</b> 684:21 748:2 813:9 820:4 867:7 <b>closer</b> 910:19,19,20 <b>Club</b> 754:20	<b>CO2</b> 757:14 <b>Coalition</b> 757:14 <b>coauthored</b> 756:10 <b>cocounsel</b> 662:20 682:17 <b>code</b> 640:17 705:11 <b>cofounders</b> 775:16 <b>cognizable</b> 674:20 <b>coincidence</b> 919:10,11 <b>coincidentally</b> 939:6 <b>collar</b> 743:10 <b>collateral</b> 702:17 703:15 <b>colleague's</b> 978:12 <b>colleagues</b> 709:1,13 730:10 <b>collect</b> 829:11 938:7 <b>collected</b> 827:21 829:13 830:21 837:20 852:7 <b>collecting</b> 823:14 830:13 831:6,15 <b>College</b> 735:13 753:8 <b>Collusion</b> 876:10,14 <b>Colombian</b> 865:6 <b>Colonel</b> 908:15 <b>Colorado</b> 665:10 724:8 724:12 725:4 767:13,14 897:1 <b>Columbia</b> 631:1,10 632:5 652:7 865:8 942:4 987:17 <b>column</b> 638:6 642:3 837:6 844:21 <b>combination</b> 869:15 963:20 965:19 <b>come</b> 681:10 711:21 719:4 732:3 742:1 743:2 761:6 763:6 769:10 770:4 777:2 792:10,12 793:11 796:8 814:8 816:20 820:16 821:9,19 822:5 825:18 826:14 828:12 831:17 855:14 861:11 865:21 866:22 872:8 882:17 890:2 892:2 901:7 941:22 946:9 952:11 970:7 <b>comes</b> 652:22 656:15 <b>comfortably</b> 945:22 <b>coming</b> 665:13 719:12 726:7 741:7,20 755:14 800:13,18 824:14,17 828:4,10 830:14 851:21 854:9 900:7 903:9 911:19 <b>commendant</b> 863:16 <b>commencing</b> 632:2
---	--	---	---

<p><b>commendably</b> 969:3 <b>commendations</b> 813:21 <b>comment</b> 701:11 708:21 <b>commented</b> 700:21 709:11 <b>commercial</b> 756:1,5,6 <b>commiserate</b> 878:7 <b>commission</b> 720:4 757:5 860:18 862:14 865:18 987:21 <b>commissioner</b> 757:3,4 812:18,19 813:3,4 819:16 821:2,3 869:6 871:22 874:1,15 <b>commissioners</b> 864:6 <b>committed</b> 653:6 835:5 <b>committee</b> 631:3 632:3 633:2 666:21 708:10 710:4 811:20 820:14 921:10 922:19,22 932:21 960:6 971:19 978:6 981:14 985:4 <b>committee's</b> 970:22 <b>committees</b> 817:10 819:4 928:13 <b>common</b> 661:7 748:13 911:5 959:11 974:14 977:18 <b>commonwealth</b> 638:15 742:12 743:15 <b>communicate</b> 884:11 <b>communication</b> 912:6 <b>community</b> 755:17 <b>companies</b> 734:6 755:13 <b>company</b> 734:10,14 783:12 <b>comparing</b> 837:21 854:1 <b>comparison</b> 785:16 <b>compensation</b> 911:7 <b>competition</b> 900:5 <b>competitive</b> 675:2,16 676:3,14 677:2,10 678:12 679:1,9,13,19 680:4,21 681:2,21 682:2,6 685:4 924:20 <b>compiled</b> 836:7,8 837:17 839:6 845:12 847:21 <b>complaining</b> 891:16 897:21 <b>complaint</b> 637:20 643:1 643:15 644:12 650:2 651:12 657:15,20 658:2 658:7,13,20,22 659:10 659:11,13,21 662:11 663:1 665:12,19 667:2 667:11,15,17 668:19,20</p>	<p>669:3 671:11,17 673:3 673:8 686:9 700:5 706:19 724:7,14,16,17 724:22 728:10,11,13 772:14 793:21 885:5,6 897:5,17,19,20,20,22 898:18,20 899:2,3,6,7 900:10 905:20 921:2,13 923:6,10,19 929:11,13 930:10,21 932:5,6,7 935:21 936:1 937:6 941:9,18 944:5 945:10 945:11,16 950:5 955:9 957:14 958:1 959:11 961:3,10 966:6,7 967:5 971:7,8 973:19 976:6,6 976:20 <b>complaints</b> 643:15 686:15 717:3 878:20 900:6,7 902:7 903:19 938:16 961:16 975:2,5 976:5 977:20 <b>complete</b> 660:15 763:12 904:12 <b>completed</b> 835:6 <b>completely</b> 894:19 977:12,16 <b>complex</b> 711:15 <b>complexities</b> 710:17 <b>compliance</b> 693:9 786:15 786:18,20 <b>complicated</b> 645:8 712:8 <b>complications</b> 786:17 <b>components</b> 754:6 <b>comprehensive</b> 805:19 909:17 <b>compressed</b> 725:13 <b>computations</b> 910:4 <b>computer</b> 769:1 781:10 952:19 <b>computers</b> 952:6 <b>con</b> 738:15 <b>concede</b> 879:6 <b>concedes</b> 638:21 <b>concentrate</b> 859:10 <b>concentration</b> 863:16 <b>concept</b> 677:2 678:12,22 712:20 <b>concepts</b> 718:15 <b>concern</b> 719:18 <b>concerned</b> 645:9 680:21 686:18 759:16 762:7 <b>concerning</b> 720:3 725:9 725:22 803:7 <b>concerns</b> 692:4 <b>concerted</b> 942:8</p>	<p><b>concise</b> 643:12 <b>conclude</b> 762:12 937:9 <b>concluded</b> 673:4 782:3 <b>conclusion</b> 668:1 674:13 778:12,16,20 806:15 815:12 941:22 964:15 <b>conclusions</b> 763:7 778:10 779:9 806:8 983:16 <b>conclusive</b> 851:20 852:10 <b>conclusively</b> 677:10 <b>conclusory</b> 644:10 <b>concurrence</b> 778:8 <b>condemned</b> 864:20 <b>condition</b> 952:20 <b>conditions</b> 739:22 <b>conduct</b> 661:8 672:17,21 708:4,6 729:20 815:16 934:12,14 <b>conducted</b> 651:17 693:9 706:10 827:4 924:5 <b>confer</b> 682:16 <b>conference</b> 740:2,15 741:3 742:19 749:13 795:4 802:5 822:22 823:1 833:8 <b>confident</b> 895:3 <b>confinement</b> 817:19 818:1,1 <b>confirm</b> 838:8,10 841:6 <b>confirmation</b> 838:5 <b>confirmed</b> 859:20 860:14 860:16 861:16 938:14 <b>confirming</b> 829:7 <b>confiscate</b> 746:7 <b>confronted</b> 959:6 <b>confuse</b> 876:7 <b>confused</b> 728:12 935:4 973:18 <b>confusing</b> 645:17 <b>confusion</b> 796:12 928:9 <b>Congress</b> 861:5 864:17 866:11 <b>congressional</b> 720:5 <b>Congressman</b> 864:9,10 <b>connection</b> 715:7 735:18 757:19 <b>connotations</b> 780:2 <b>consent</b> 779:13 <b>Consequently</b> 940:6 <b>Conservative</b> 784:7 <b>considerable</b> 926:3,10 <b>considerably</b> 959:9 964:3 <b>consideration</b> 814:16 815:2 <b>considered</b> 692:16 871:10 876:14,20</p>	<p>924:19 930:15 <b>considering</b> 666:20 <b>consisted</b> 818:20,21 <b>consistent</b> 644:15 680:16 681:8 786:7 <b>consolidate</b> 975:7 <b>constitution</b> 690:10,20 873:21 881:15 940:19 941:6 <b>constitutional</b> 653:16,20 699:1 <b>constitutionally</b> 720:11 <b>constraints</b> 704:19 715:17,18 <b>construed</b> 676:10 <b>consult</b> 820:11 839:16,20 <b>consultancy</b> 811:7 <b>consultant</b> 734:1 <b>consulting</b> 734:5,5 810:22 811:5 <b>contact</b> 636:7 759:22 816:18 820:9 832:7 <b>contacted</b> 757:18 766:16 816:18 894:21 <b>contacts</b> 757:20 793:3 <b>contain</b> 682:5 <b>contained</b> 950:4 <b>containing</b> 939:14 <b>contemplating</b> 687:11 <b>content</b> 849:22 <b>contents</b> 771:7,18 773:6 777:7,21 827:19 920:16 920:20 <b>contest</b> 655:20 658:5,11 677:8 681:11 972:17 <b>contesting</b> 725:17 <b>contests</b> 881:19 <b>context</b> 724:17 725:4 897:8 <b>contexts</b> 703:7 <b>continual</b> 852:3 <b>continuation</b> 736:2 <b>continue</b> 793:1 845:22 846:7 850:3 856:21 <b>continued</b> 631:15 632:1 634:1 637:1 834:15 842:17 846:13 850:8 861:5 918:20 977:17 <b>Continuing</b> 714:1 <b>contracts</b> 796:22 864:5 865:17 <b>contradicts</b> 964:14 <b>contravention</b> 694:7 <b>contribute</b> 767:11 899:12 <b>contributed</b> 767:8 <b>contribution</b> 899:9,10</p>
--	---	--	--

944:6 <b>controversial</b> 863:8 <b>convene</b> 981:15 984:8 985:18 <b>convention</b> 656:6 738:6 738:11,14,17 739:4,18 740:7 742:9,10,20 744:13,21 748:1 882:21 886:22 887:19,21 888:4 888:12 896:1 933:8,13 <b>conversant</b> 760:5 <b>conversation</b> 743:4 878:9 880:20 887:14 <b>conversations</b> 761:2 841:13 965:22 <b>conveying</b> 768:11 <b>convict</b> 932:19 <b>convicted</b> 864:9,10 921:15 <b>convince</b> 675:1,5 <b>convinced</b> 661:9 730:10 <b>Coomer</b> 897:2 <b>coordinate</b> 762:17 824:10 973:8 <b>coordinated</b> 802:13 <b>coordinating</b> 802:7 <b>coordinator</b> 796:1,6 824:7 825:1 <b>cop</b> 813:6 <b>copied</b> 869:3 870:5 <b>copy</b> 742:11 983:1 <b>Corbin</b> 729:19 <b>core</b> 643:2 900:14 909:7 <b>Corey</b> 635:8 733:1,13 882:2,12 887:10,11 888:14,20,21 970:14 <b>Corey's</b> 882:3 889:22 <b>Cornell</b> 767:16 <b>Corps</b> 791:3 <b>correct</b> 655:8 658:1,6,12 658:20,21 661:15 662:3 662:14 663:2,3,6,10,17 666:14,18 667:3,16,17 667:18 668:4,7,15,21 669:5,7 671:14 672:18 672:19,22 673:1,5,6,9 673:21 674:5,16,20 675:3,11,12 676:7,8,11 677:9 678:9,10 680:10 680:18 682:3 683:13,14 683:18,19 685:18 687:7 687:8 688:1,2 689:6 690:12,15 691:7,10,10 691:13 692:6,7 693:11 693:12 694:11,12,16,17 694:18,22 695:8,17	696:9,21,22 698:8,12 700:1,2,7,15,16 701:1,2 701:8,12 705:17,20 706:2,20 707:5,10,15 707:16 717:12 722:7,12 722:15,17 730:20 744:10,11 748:19 784:21 785:3 798:1 800:20 801:13 803:3,4 815:20 822:8 833:11 836:22 838:11 840:18 842:2 844:4 845:1 847:11 848:6 849:15 851:10,11,14 852:15 856:19 857:14 873:16 876:2 883:21 902:10 943:17 946:10 947:2,7 948:9 950:6 952:3 955:3 956:5 958:5,20 961:21 963:8,13 964:13 965:14 966:15 967:11 967:17,21 968:21 <b>corrected</b> 648:10 943:19 <b>correction</b> 813:6 818:21 821:2 <b>corrections</b> 819:16 872:1 874:15 <b>correctly</b> 937:13 <b>corresponding</b> 841:3 855:22 <b>counsel</b> 633:13,15 634:12 634:18 637:2,11 655:17 656:5 701:17 702:8 708:1 709:4 726:21 727:2 734:16 741:18 780:22 784:4 791:5 799:16 802:11,11,12 834:13 895:15 900:18 900:19 972:20,20 981:9 981:17 984:4 987:8,11 <b>counsel's</b> 635:2 645:4 686:22 960:15 <b>count</b> 640:3 649:12 713:14 748:4 853:7 891:18,22 933:9 941:12 947:6 949:4,5 979:12 979:14 <b>counted</b> 692:15 883:13 883:17 935:11,17 939:16 940:19 949:12 950:13 957:10,22 970:10 977:9 979:9 <b>counter</b> 891:9 <b>counterproductive</b> 983:21 <b>counties</b> 664:11 690:16	690:17,18,22 691:3,3,7 691:8 692:13 696:2 698:16,19 778:22 779:1 779:3,4 781:16 782:13 922:10,11 939:2 <b>counting</b> 641:3,16 706:9 725:17 736:3 745:10 746:20 747:4 749:4 883:1 900:3,5 908:3 910:18 933:7,11,14 934:22 939:20 940:5 947:12 948:20 966:14 969:6 970:2,4,9 977:13 978:11 <b>country</b> 711:6 755:11 774:18,21 792:21 796:12 813:16 814:5 819:1 821:6,7 859:10 861:2 869:17 870:18 872:9,12 <b>counts</b> 639:9 641:13,15 815:18 <b>county</b> 640:9 691:13,22 691:22 694:21 695:16 931:11,18 933:18,21 934:22 935:3,3,8,8 936:14 963:15 965:12 966:20 977:17 <b>couple</b> 710:14 724:4 757:6 781:4 793:22 798:22 799:5 881:2 883:14,15,17 916:1 <b>couriers</b> 795:12 <b>course</b> 689:22 778:7 791:10 813:11 874:18 915:22 921:22 922:1 936:14 955:8 956:2 957:13 <b>courses</b> 781:20 <b>court</b> 631:1,10 632:3 637:6,8,20 640:16 645:14 646:3,9,11,15 647:4 648:12,12 649:3 649:4,10,14,18 650:5 650:10 665:2 671:1,6 682:7,10 684:9,13 685:5 686:18 687:13,16 692:12 693:3,7 695:18 695:19 696:1,6 697:3,6 697:7,9,13 698:3 700:4 700:8,10,21 701:4 702:2 705:22 707:3 710:21 711:1 712:1 716:7 717:11,22 718:2 718:4,12,13 720:1,10 720:13,18 721:7 724:13	729:12 730:19 742:6,12 742:21 743:15 798:15 887:16 925:10,15 926:11,22 927:6 928:20 941:15,21 964:11 965:6 970:14 975:3,9,11 977:10,21 <b>court's</b> 638:2 679:14 683:9 704:18 <b>courts</b> 651:21 655:5 684:22 698:5 703:7 705:12,12,18 711:2 722:22 926:13 <b>covered</b> 714:2 742:20 <b>covers</b> 758:3 <b>COVID</b> 746:20 758:3 <b>cows</b> 883:3 <b>Cox</b> 767:13 <b>Crawford</b> 730:6 <b>crazy</b> 824:2 911:12 <b>create</b> 855:11 <b>created</b> 811:22 928:8 <b>creates</b> 874:12 <b>creating</b> 941:20 <b>creative</b> 718:22 719:2,5 721:10,13,21,22 <b>credential</b> 745:1,3 <b>credentialed</b> 768:18,21 933:6 963:11 <b>credentials</b> 747:2 767:20 768:1,16 772:4 944:17 <b>credibility</b> 836:9 <b>crest</b> 946:18 <b>crime</b> 818:18 860:21,22 864:15 868:3,3 872:19 <b>criminal</b> 655:8 730:2 811:7 812:5,8,9 815:18 816:21 817:14 819:1,4 860:1,3,7,8,9 861:2,3 867:17 972:4,6 <b>criminally</b> 932:20 <b>Crisis</b> 811:22 <b>Critically</b> 756:19 <b>criticized</b> 712:17 925:5 926:4 928:1 <b>cross</b> 635:3,7 857:2 <b>cross-examination</b> 654:10 730:12,14 780:21 942:22 <b>cross-examine</b> 772:5 850:11 <b>crossed</b> 743:12 <b>crucible</b> 730:13 <b>cruise</b> 866:10 <b>cubicles</b> 823:4 <b>cure</b> 640:13 645:13 646:5
--	---	---	---

646:5 653:15 690:11,14 690:17 691:4 694:9,16 694:20 695:8,9 698:17 928:10,14 954:21 958:12 <b>curiae</b> 655:17 <b>currently</b> 733:22 753:18 790:12,13 <b>cut</b> 765:18 868:10 976:1 977:1,3,4,6 <b>cutting</b> 976:14	658:3,7,14,16 659:3,9 659:10,14 660:22 726:3 743:13 763:19,22 764:4 764:16 792:19 793:21 794:1 799:5 816:3 829:15 864:21 865:9 910:16,17 965:5 <b>DC</b> 633:10,17 634:12,18 687:17 688:4 691:18 736:1 738:4 741:9 791:14 816:20 821:19 821:20 822:2 <b>DC17</b> 693:21 <b>DEA</b> 813:8 <b>dead</b> 838:6,7 848:8 917:17 918:2,21 945:16 953:14 954:20 955:12 <b>deadline</b> 649:11 664:10 <b>deal</b> 639:15 863:9 869:10 874:20 884:6 <b>dealing</b> 837:9,9 <b>deals</b> 712:20 <b>death</b> 837:22 841:4,5 843:3 868:22 917:10 <b>deaths</b> 863:15 <b>deceive</b> 930:17 <b>December</b> 631:13 649:10 649:11 650:6 711:5 814:12 816:17 986:13 <b>deceptive</b> 930:2 <b>decide</b> 644:15 668:13 696:2 710:2 763:1 981:15 984:4 985:9 <b>decided</b> 687:21 697:7 738:10 763:8 765:16 885:15 888:7 898:19 908:5,5 977:22 <b>decision</b> 638:22 646:18 647:3 661:22 662:3,6 667:16,22 669:7,11 673:4,5,9,12,14 674:3,4 674:19 678:15 681:6 686:13 687:7 692:17,21 694:8 697:12 700:20 712:11 721:7 839:2 884:14,16 885:11,19,20 892:3 928:16 941:15 986:5,6 <b>decisions</b> 797:5 881:16 895:5 925:10,16 <b>declaration</b> 645:20 953:4 <b>declarations</b> 803:7 939:13 959:8,10 966:12 <b>declaring</b> 654:2 <b>declined</b> 866:6,6 884:1 <b>declining</b> 683:22	<b>deemed</b> 707:3 932:7 <b>deep</b> 805:18 <b>defamation</b> 897:10,14 <b>defective</b> 935:14 <b>defects</b> 643:2 646:7,12 <b>defend</b> 755:1,3 <b>defendant</b> 642:19 924:7 927:8 972:16 973:4 <b>defendants</b> 649:6 650:15 653:6 691:4 939:11 <b>defense</b> 791:5 <b>defer</b> 984:21 <b>Deferred</b> 926:18 <b>deficit</b> 868:15 <b>define</b> 669:21 957:12,18 957:19 <b>defined</b> 843:3 <b>definitely</b> 723:2 759:16 <b>degree</b> 713:5 735:11,14 752:22 753:1,2,4,6 776:11 790:20 <b>degrees</b> 735:10 752:21 753:7 760:16 790:17 <b>Delaware</b> 934:21 935:2,8 965:11 <b>delay</b> 669:13 <b>delayed</b> 751:21 752:11 <b>Delegates</b> 656:6 <b>deliver</b> 938:8 <b>delivering</b> 936:20 <b>delivery</b> 936:11,15 <b>democrat</b> 970:13 <b>democratic</b> 645:18 690:17 693:20 834:14 883:8 947:1 980:7 <b>democratic-controlled</b> 691:2 <b>democrats</b> 817:16 864:8 879:3 947:15 969:4,7,8 969:13 970:3,9 980:18 <b>demonstrates</b> 907:12 <b>demonstrating</b> 920:13 <b>denial</b> 647:8 <b>denied</b> 664:9 739:1,17 744:5 876:15 932:22 939:18 963:11 <b>Denver</b> 636:9 767:13 <b>department</b> 743:2,16 745:21 746:5 791:16 810:22 812:19 815:13 859:19 860:2 868:20 869:16 872:1 890:5,9 <b>departments</b> 890:8 <b>depend</b> 673:22 679:18,20 688:15 <b>depended</b> 895:4	<b>depending</b> 807:5 <b>depends</b> 692:20 703:21 <b>deployed</b> 791:8 <b>deploying</b> 866:10 <b>deposition</b> 665:10 724:8 724:12 725:4,7 726:22 728:4 897:1,2 <b>deputy</b> 740:4 813:3 884:10 <b>describe</b> 740:11 753:20 774:11 793:17 794:4,4 794:11 822:18,19 823:8 859:22 860:1 880:6 901:11 905:11 907:6 914:3 <b>described</b> 715:20 739:12 742:3 760:8 877:18 882:18 883:2 887:14 903:7 915:1 918:11 970:2 972:5 974:20 <b>describing</b> 739:11 760:1 897:16 <b>description</b> 892:6 <b>designated</b> 973:7 <b>designed</b> 748:4 780:9 <b>desk</b> 738:20 739:15 742:21 744:22 <b>despite</b> 786:13,14,15,16 <b>detail</b> 692:11 <b>detailed</b> 927:7 <b>details</b> 786:10 829:7 891:20 <b>detective</b> 813:7 <b>determination</b> 982:5 <b>determine</b> 684:2 692:14 747:16 749:5 <b>Detroit</b> 908:8 976:7 977:6 <b>devastating</b> 701:11 <b>develop</b> 754:9 870:10 880:11 <b>developed</b> 976:21 <b>devoted</b> 873:2,3 <b>dichotomy</b> 754:17 <b>died</b> 849:14,17 852:14 874:4 952:10 <b>Diego</b> 791:9 <b>dies</b> 853:4 <b>difference</b> 647:3 795:14 930:11 <b>different</b> 647:18 660:11 660:19 668:9 685:22 691:8,9,22 692:13,14 693:8 711:20 715:10,21 716:4 717:1,21 722:15 723:16 746:16 770:8
---	--	--	--

775:2,3 786:4 795:7 798:22 800:8,13 821:6 823:16 828:5,6,8,11 831:5 856:14 878:21 881:3,3,13 911:11 917:8,20 936:7,18 959:20 961:10 973:11 978:20,20 979:4,5 <b>differently</b> 694:19 695:15 696:8,15 716:12 <b>differs</b> 699:8 <b>diGenova</b> 799:3 833:19 880:1 893:22 894:1 900:14,15 <b>dilute</b> 941:1 <b>diluted</b> 687:6 <b>dilution</b> 686:6,8 940:14 <b>dire</b> 635:12 839:1,10,12 843:11,12 847:19,20 853:21 857:3 <b>direct</b> 635:3,7 637:1 702:11 733:17 751:8 790:8 810:14 842:17 846:13 850:8 859:5 878:14 924:3,5 939:3 958:15 962:1,17,19 963:4 964:6 <b>directed</b> 805:13 <b>directing</b> 762:8 <b>direction</b> 670:7 796:17 987:6 <b>directions</b> 800:13 886:21 <b>directly</b> 740:21 741:2,22 747:11 797:19 800:9 828:16 887:17 904:18 938:8 983:22 <b>director</b> 735:1 740:5 784:2 <b>directors</b> 816:21 <b>diring</b> 853:10 <b>disadvantage</b> 912:22 <b>disagree</b> 673:13 697:2 956:21 <b>disagreed</b> 687:11 695:14 696:20 <b>disagreement</b> 687:15 984:7 <b>disagrees</b> 697:13 <b>disappeared</b> 636:16 <b>discard</b> 903:1 <b>discernable</b> 713:15 <b>disciplinary</b> 631:7 633:10 633:13,15 634:12,18 635:2 637:2,11 686:22 708:1 709:3 726:21 727:2 780:22 784:4	921:18 960:15 981:16 981:18 <b>disciplined</b> 921:9,12 <b>disclosure</b> 972:1 <b>discouraging</b> 948:14 <b>discovered</b> 955:11 <b>discovery</b> 647:15 <b>discredited</b> 876:13 <b>discretion</b> 648:14 651:11 694:21 695:16 <b>discriminates</b> 641:20 <b>discrimination</b> 642:15 711:22 <b>discrimination'</b> 642:22 <b>discuss</b> 636:3 640:22 641:1 681:14,17 962:2 <b>discussed</b> 638:11 639:12 645:3 646:15 779:19 780:1 878:14 925:9 961:20 964:6 973:17 974:22 <b>discussing</b> 637:5 876:1 975:13 <b>discussion</b> 639:21 682:6 682:20 683:16 685:12 686:16 752:14 806:22 807:1 809:19 898:4 <b>discussions</b> 802:6 <b>dismiss</b> 642:8 684:1 700:6 <b>dismissal</b> 669:8,12 <b>dismissed</b> 650:19 <b>disorganized</b> 762:5 <b>disparate</b> 691:6 712:20 <b>dispute</b> 964:20 <b>disputes</b> 655:15 <b>disputing</b> 948:16 <b>disqualify</b> 657:9 <b>dissent</b> 647:5,7,8 <b>disservice</b> 828:3 <b>distance</b> 640:19 <b>distinct</b> 652:12 <b>distinctly</b> 895:6 905:16 <b>distinguish</b> 676:21 <b>distinguished</b> 972:7 <b>distorted</b> 940:20 <b>district</b> 631:1,9 632:4 637:6,20 638:2 649:4 649:10,14 650:10 652:6 652:6,7,7,8,9,10,12 682:10 683:9 684:13 685:5 686:18 692:12 700:4,8,10 705:11,12 815:8 861:13,17 862:3 863:21 987:17 <b>districts</b> 652:6,15,18	720:5 899:17 <b>ditto</b> 640:12 <b>dive</b> 805:18 <b>division</b> 860:1,3,7,8,8,9,9 860:10 863:11 972:4 <b>divulge</b> 811:9 <b>Docket</b> 631:5,7 <b>doctrine</b> 702:18 <b>document</b> 669:9,13 688:3 742:7 787:19 830:10,11 838:3 841:21 842:6 845:13 914:16,17 915:1 915:10,15 918:9 923:20 923:21 929:7 958:8 965:3 <b>documented</b> 872:13 <b>documents</b> 764:19 803:17 824:14 826:10 828:4 830:11 850:1 851:21,21 852:4,7 901:12 902:7 903:9 913:13,17,21 914:8 925:22 930:7 941:13 953:14 956:18 <b>doing</b> 642:9 667:7 668:8 691:9 716:7 719:11,11 748:9 793:6 797:17 798:4 803:15 813:10 828:3 830:16 841:7,11 841:13 853:11 871:18 871:19 880:4 893:13,13 895:2,2 896:3 912:1 970:2 982:14 <b>dollars</b> 864:5 <b>domestic</b> 814:19 <b>Dominion</b> 897:10 <b>Donald</b> 734:22 738:16 790:14 876:1 <b>Donora</b> 845:6 <b>dont'</b> 884:2 <b>double</b> 729:20 916:7 918:17 <b>double-checked</b> 767:1 <b>doubt</b> 716:2 <b>Doug</b> 783:15 <b>Dowd</b> 877:2 <b>downloadable</b> 762:4 <b>dozen</b> 926:11 <b>dozens</b> 936:16 <b>Dr</b> 767:13,14,16,17 880:1 886:12 893:4 <b>draft</b> 665:18 717:3 878:20 897:22,22 898:12 973:21 <b>drafted</b> 715:21 898:20 901:13 944:4	<b>drafting</b> 657:15 724:14 900:9 905:19 913:22 973:18 <b>dramatic</b> 777:12 <b>dramatically</b> 979:11 <b>draw</b> 970:15 <b>drawing</b> 907:9,11 <b>drawn</b> 874:6 <b>drew</b> 944:18 <b>drilling</b> 755:15 <b>drive-by</b> 684:8 <b>drove</b> 886:2,3,18 <b>Droz</b> 635:9 636:12 750:6 750:12,13 751:4,11 752:4,7,9,16,20 766:11 770:17 772:3,6 773:5 773:16 774:7 778:3 781:2 785:11 787:6,13 905:13 911:17 943:4,15 <b>Droz'</b> 771:16 <b>Droz's</b> 906:9 <b>drug</b> 813:8 865:6 <b>Dubai</b> 812:3 <b>due</b> 639:13 640:4,6 646:8 693:10 694:6 699:18 700:9,14,16,22 701:15 701:18,18 702:18 703:1 703:8,16 704:11,18 706:6 746:19 932:22 933:2 937:7 960:10 <b>duly</b> 733:15 751:6 790:6 <b>duties</b> 859:17,21 868:20 <b>duty</b> 813:22 814:1
<b>E</b>			
<b>E</b> 635:1 636:1,1 809:1,1 <b>E-mail</b> 634:8 <b>earlier</b> 665:12 703:14 805:18 828:2 894:6 899:1 913:12 923:15 959:21 961:6 971:8 <b>early</b> 821:21 822:11 827:3 829:14 838:18,19 847:9 861:21 864:9 867:3 869:1 886:9 975:12,12 <b>earned</b> 813:19 <b>easiest</b> 768:12 <b>East</b> 820:4 <b>Eastern</b> 652:9 <b>easy</b> 779:4 <b>Echoing</b> 751:14 <b>economic</b> 868:10 <b>editing</b> 765:6 771:16 <b>editor</b> 761:4 762:18 <b>education</b> 758:4 835:7			

<p><b>eerily</b> 899:16 <b>effect</b> 667:10 745:4 773:14 777:11 <b>effective</b> 702:21 <b>effectively</b> 864:15 <b>effort</b> 759:8 760:10 840:20 942:8 973:8 <b>efforts</b> 834:16 840:20 <b>eight</b> 709:6 747:11 815:18 867:11,22 872:17 875:13 <b>eighteen-month</b> 814:21 <b>either</b> 846:5 851:22 917:8 950:4 959:15 <b>elected</b> 834:15 867:1 868:2 <b>election</b> 637:19 639:9 640:17 645:10,11 646:4 646:14,20 647:9 653:7 654:19 655:11,15 656:13,19 657:1,5,18 658:3,8,14 659:5,7 664:11 675:7 679:15 686:19 690:8 692:3 694:21 695:21 701:17 702:1 703:18 704:20 711:7 712:2 715:8 716:2 718:5 721:3 725:6,15 735:17,18,21 741:17 747:4 749:9 757:18,19 758:13 759:1 759:2 760:12 773:17 774:8,9 775:17 778:15 778:18 782:19 784:9 786:20 787:2 792:13,14 792:19 797:3 821:14,18 821:21 823:14,16 850:16,22 852:2 853:4 867:7 877:5,7,8,9,15,19 878:1 879:1,5 883:7 905:9 907:17 909:2,4 910:17 913:2 916:6 919:16 923:15,22 924:2 924:5 925:2 940:16 941:12,14 942:5,6 945:6,21 947:19 948:20 950:10 955:7 972:9,14 972:17,21 973:14 <b>elections</b> 640:4 695:17 702:6 710:17 711:15 881:21 941:10 942:3 946:16 969:9,16 <b>electoral</b> 649:12 654:4 <b>Electors</b> 637:18 639:9 686:20 687:22 <b>Electric</b> 753:22</p>	<p><b>Electronics</b> 754:1 <b>elements</b> 639:7 643:12 729:21 812:16 <b>elevated</b> 813:2,3 <b>eligibility</b> 675:11 <b>eligible</b> 685:10 <b>Ellis</b> 814:3 834:18 884:8 893:21 <b>email</b> 634:9 760:6 828:18 828:20 <b>emailed</b> 828:19 <b>emergency</b> 664:9 869:7 <b>Emirates</b> 812:3 <b>employed</b> 692:14 733:22 753:18 790:12 987:8,12 <b>employee</b> 897:10 987:11 <b>employees</b> 933:9 <b>employment</b> 754:3 810:20 812:12 813:12 870:19,21 <b>empty</b> 937:3 <b>empty-headed</b> 661:10 <b>encompass</b> 685:6 <b>ended</b> 791:13,13 <b>energy</b> 753:16 756:14 757:6 758:5 <b>enforcement</b> 813:8 818:14,17 819:21 820:11 874:18 <b>engaging</b> 691:4 <b>engineering</b> 754:6 769:3 <b>England</b> 814:4 <b>English</b> 790:18 <b>enhanced</b> 869:19 <b>enjoin</b> 866:9 <b>enormous</b> 755:21 824:21 <b>ensure</b> 698:19 742:1 <b>enter</b> 739:14 <b>entered</b> 664:3,16 747:1,3 797:9 941:4 959:2 <b>entering</b> 933:10 <b>enterprise</b> 889:1 <b>enthused</b> 765:16 <b>entire</b> 737:5 <b>entirely</b> 756:18 936:6 <b>entitled</b> 707:5 836:21 <b>entries</b> 953:1,9 <b>envelope</b> 949:7,8,10 <b>envelopes</b> 747:18 939:13 939:15 940:7 <b>environmental</b> 754:19,21 755:7 756:2 <b>episodes</b> 965:21 <b>Epshteyn</b> 833:20 834:2 893:21 <b>equal</b> 690:7 692:4,19</p>	<p>693:10,10,17 698:9 706:5 710:16 711:14 718:19 721:3 864:7 932:22 933:2 937:7 960:10 963:16 <b>equally</b> 641:21 891:8 <b>equitable</b> 707:4 <b>Equity</b> 897:10 <b>Eric</b> 735:22 740:13 741:4 769:1 856:13,14 888:7 888:7,8,8 <b>Erie</b> 936:13 966:20 <b>error</b> 673:15,17,20,21 674:4,8 <b>errors</b> 694:6 953:7,10 <b>ESPOSITO</b> 634:14 731:16 <b>Esquire</b> 633:3,7,12,14 634:3,4,14,17,20 <b>Essen</b> 874:1 <b>essence</b> 760:7 <b>essentially</b> 673:11 688:8 691:7 712:19 769:6 785:21 <b>establish</b> 772:10 780:13 869:17 <b>established</b> 676:13 747:10 868:17 869:5,18 869:22 <b>establishing</b> 771:14 <b>et</b> 758:22,22 775:22,22 775:22 781:10 817:19 823:9,9 924:8,9,9 <b>ethics</b> 815:11 <b>euphemistic</b> 955:5 <b>evaluate</b> 942:3 <b>evening</b> 741:10 821:15,15 822:1 986:1 <b>events</b> 739:11 742:3 821:6 <b>eventually</b> 744:12 802:12 815:18 977:20 <b>everybody</b> 794:15 800:5 803:15 897:14 955:1 980:9 982:17 <b>Everything's</b> 880:5 <b>evidence</b> 731:11 771:1,6 771:9,11 777:2,9 783:6 807:12 827:12 835:9 843:10 847:17 849:1 853:13 909:1,3 914:20 920:4 929:13 932:5,6 935:22 950:18 956:3 957:8 963:18 965:16 983:8,10 984:5,5 <b>evidentiary</b> 935:22 966:4</p>	<p>966:4,9,10 <b>exact</b> 658:5,10,16 663:7 776:5 793:19 827:2 897:7 <b>exactly</b> 659:4 704:8 781:8 781:13 796:9 807:5 851:9 854:21 878:2 880:4 886:6 888:22 892:16 898:5 944:9 974:6 977:4 <b>exaggerated</b> 911:12,14 942:13 <b>examination</b> 637:1 645:4 707:22 727:1 733:17 751:8 785:8 790:8 810:14 842:17 846:13 850:8 859:5 962:2,17 962:20 963:4 964:6 <b>examine</b> 941:13 <b>examined</b> 733:16 751:6 790:6 <b>example</b> 665:7,9 681:21 692:21 712:2 713:8,11 715:19 719:5 725:21 726:3 729:15 757:2 843:19,22 856:12 881:11 909:5 912:14 931:9 937:8 946:22 958:13 964:4,5 965:10 966:19 979:3 <b>examples</b> 712:9 955:7 <b>exception</b> 909:12 <b>exceptional</b> 813:22 <b>exceptions</b> 969:13 <b>excerpt</b> 725:8 <b>exchange</b> 911:20 <b>exchanged</b> 912:1,3 <b>excluded</b> 942:6 970:14 974:12 975:18 <b>excluding</b> 949:16 <b>exclusion</b> 777:3 <b>excuse</b> 740:17 760:13 761:10 765:18 766:5 798:10 831:10 859:22 895:2 909:21 924:12 981:19 <b>excused</b> 728:21 731:7 750:3,5 787:14,15 804:6,9 858:7,9 981:12 <b>execute</b> 887:16 <b>execution</b> 734:17 <b>executive</b> 634:22 694:15 695:7,19 791:15 981:15 <b>executives</b> 881:15 <b>exercise</b> 941:4 <b>exhausted</b> 689:4</p>
---	---	---	--

<p><b>exhibit</b> 637:11,11 682:13 682:14 683:4 686:22 687:18 688:4 691:18 709:4 726:21 727:5 766:9 776:13 784:1,4 825:15 829:18 835:22 835:22 836:21 837:8 838:22 839:2 842:6,22 843:14,15,16 845:1 846:12,15 847:16 849:1 850:7,15 853:11 855:2 855:5 856:7,10 906:20 907:1 910:9 914:14 916:22 917:3 918:4,8 919:2 923:11 929:21 930:6 943:5 949:21 950:1,15 960:15</p> <p><b>exhibits</b> 825:9,10,11,20 826:4,15 827:1,11,15 835:10 836:2,6,17 847:13 913:15 920:4,12 949:20 950:4,16 951:2 984:5,6,20 985:4</p> <p><b>exist</b> 937:4</p> <p><b>existing</b> 670:4,5 719:6</p> <p><b>exists</b> 723:21</p> <p><b>expand</b> 718:14 724:10 897:12 903:5</p> <p><b>expansive</b> 718:18</p> <p><b>expect</b> 721:22 982:8,10</p> <p><b>expectation</b> 805:6</p> <p><b>expected</b> 885:2</p> <p><b>expedited</b> 975:10</p> <p><b>experience</b> 936:19 948:3 972:6,9</p> <p><b>expert</b> 634:18 716:2 770:13,15 772:6 773:5 773:22 774:21 776:11 776:19,21 906:19 972:19 973:5,12</p> <p><b>expertise</b> 753:10 768:7 776:18,20</p> <p><b>experts</b> 759:7 762:21 778:5 917:19</p> <p><b>expires</b> 987:21</p> <p><b>explain</b> 828:2 914:6,6,9 922:9 974:1</p> <p><b>explained</b> 824:19 891:4 918:12 951:7,8</p> <p><b>explaining</b> 890:21</p> <p><b>explains</b> 779:2</p> <p><b>explanation</b> 828:3 835:14 835:15 961:13</p> <p><b>explicitly</b> 682:11</p> <p><b>extend</b> 702:22</p> <p><b>extended</b> 680:9</p>	<p><b>extensive</b> 768:1,4,8 934:15</p> <p><b>extensively</b> 655:5 768:18</p> <p><b>extent</b> 687:4 694:4 914:3 914:4 984:18,19 985:3</p> <p><b>extraction</b> 756:1,6</p> <p><b>extraditing</b> 863:9</p> <p><b>extradition</b> 863:6,12</p> <p><b>extraordinary</b> 887:14</p> <p><b>extrapolate</b> 913:5 916:7 918:18</p> <p><b>extrapolated</b> 918:15</p> <p><b>extrapolating</b> 918:14</p> <p><b>extrapolations</b> 909:5,6</p> <p><b>extremely</b> 747:7</p> <hr/> <p style="text-align: center;"><b>F</b></p> <hr/> <p><b>F</b> 809:1</p> <p><b>facility</b> 739:14 742:22 743:5,11 744:7,8 746:2 746:3,6 747:6 749:2,6 755:20,21</p> <p><b>fact</b> 639:6 647:22 648:1 650:11 653:5,10,14,19 654:1 661:14 668:2,6 668:17 674:15 679:14 698:8 706:17 731:14 781:14 806:7,15 845:4 877:8 890:15 899:5 900:3 920:8 921:6 955:6 959:6 963:19 969:14 975:6,22 976:18 977:2 983:16</p> <p><b>facts</b> 641:15,17 651:15 708:22 709:12 711:4 717:20 882:18 945:9 957:7,8,12,18,19 958:2 958:7,11 963:20 965:8 966:5,8 970:19 971:7 977:18,19,20 982:9,10</p> <p><b>factual</b> 983:22</p> <p><b>fail</b> 927:13,13</p> <p><b>failed</b> 698:18</p> <p><b>failure</b> 941:15,16</p> <p><b>fair</b> 761:19 765:8 776:7 825:6 945:9</p> <p><b>fairly</b> 748:13 764:21 765:6 786:2 843:17 918:11 940:19</p> <p><b>faith</b> 661:4,5 671:19 688:10,12,14,14,16,18 688:20 689:22 703:3 950:9 955:17</p> <p><b>fall</b> 812:17</p> <p><b>familiar</b> 638:17 678:9 692:9 705:10 741:15,16</p>	<p>784:6,14,17 805:10 825:17 834:18 923:7 938:2 946:19,21</p> <p><b>familiarity</b> 973:1</p> <p><b>familiarize</b> 725:13</p> <p><b>families</b> 862:15,17,21</p> <p><b>family</b> 866:4</p> <p><b>famous</b> 864:1 873:5</p> <p><b>far</b> 725:22 726:8 745:12 747:15 748:8 759:15 764:13 768:6 774:21 777:10 883:13 889:10 916:5 946:9 970:1</p> <p><b>FARC</b> 865:7 866:2</p> <p><b>fast</b> 910:8</p> <p><b>faster</b> 949:14,17</p> <p><b>fatwas</b> 866:1</p> <p><b>fault</b> 683:1 952:1</p> <p><b>favor</b> 720:14 779:8 865:20 954:7</p> <p><b>favorable</b> 953:18 957:1</p> <p><b>favored</b> 911:2</p> <p><b>FBI</b> 869:15 875:11,12 890:6</p> <p><b>featured</b> 872:3</p> <p><b>features</b> 645:13</p> <p><b>February</b> 782:3 816:7,8 816:8 902:2</p> <p><b>federal</b> 642:14 643:5,6 645:14,20 646:3,8 647:11 651:21 655:5 656:12,17,22 657:4,8 657:13,20 661:19 682:7 690:10 692:3 697:3 702:2,2 705:12,14,17 705:22 706:1 716:21 720:5 722:22 724:13 817:1 818:20,21 835:2 835:3 926:13 927:6 940:16 957:6</p> <p><b>feeling</b> 919:13</p> <p><b>feet</b> 640:9 745:13 746:19 747:11,21 755:21</p> <p><b>fellow</b> 757:9</p> <p><b>felt</b> 928:5</p> <p><b>female</b> 833:21</p> <p><b>Fifth</b> 633:16 634:6 934:9</p> <p><b>Fifty</b> 902:14 921:11</p> <p><b>fight</b> 754:21 794:17</p> <p><b>fight</b> 754:21</p> <p><b>figure</b> 652:20 658:17 797:16 889:3 916:1</p> <p><b>figured</b> 795:16 926:15</p> <p><b>file</b> 648:11 649:2 650:16 658:13 665:18 667:2 806:6</p>	<p><b>filed</b> 649:17,19 650:2,5 650:17 655:21 658:3,7 658:20 659:1 662:11 663:1 726:4 793:22 889:17 967:6</p> <p><b>files</b> 881:2</p> <p><b>filing</b> 657:5,15 667:11,17 668:19 669:3,9,13 922:4</p> <p><b>filled</b> 850:21 959:17</p> <p><b>final</b> 941:3 986:5,5</p> <p><b>finally</b> 640:21 642:1 653:2,22 747:1,6 885:14 888:7 935:11,21 937:16</p> <p><b>finance</b> 655:1,13 972:18</p> <p><b>financial</b> 786:16 864:22</p> <p><b>financially</b> 987:12</p> <p><b>find</b> 682:11 700:14 762:10 769:18,21 848:4 854:19 856:2 878:13,18 879:13 928:2 954:2 966:11,16 985:1</p> <p><b>FindAGrave.com</b> 847:2 848:2,2</p> <p><b>finding</b> 680:5 807:11,12 807:17,22 965:22 983:5 983:6</p> <p><b>findings</b> 806:7,14 817:4 983:15</p> <p><b>fine</b> 770:2 815:11 861:8 880:5 920:9 985:2,21</p> <p><b>fined</b> 815:11</p> <p><b>finish</b> 717:7 805:7 947:22 959:19</p> <p><b>finished</b> 637:5 957:17 968:7 982:2</p> <p><b>Fiorello</b> 873:5</p> <p><b>fire</b> 874:1</p> <p><b>firm</b> 662:12 791:9</p> <p><b>first</b> 636:9,12 637:16 642:2,11 647:18 648:6 648:18 650:4,17 653:4 658:2,6,19,22 659:10 663:1 700:5 701:18,21 702:4 720:20 724:14,16 724:22 728:11,13 732:15 733:15 742:17 748:17 751:6 756:4 763:1 767:12 776:15 779:20 790:6 793:21 795:13 799:14 813:3 819:8 822:10 826:20 829:15 832:12,14,15 834:5,7,10,17,21 835:1 835:13,20 836:1,5</p>
---	--	--	---

837:3,6 860:15 868:11 868:18 869:5,17 871:11 871:11 874:5 876:4 877:4,7 878:18 888:14 891:12 892:3 895:19 896:8,16 897:4 898:18 899:5 902:4 914:11 924:19 928:9 931:1,8,9 934:18 940:13 941:17 943:3 949:21 951:14,16 951:21 958:13 971:22 973:18 975:12 <b>firsthand</b> 738:12 <b>fit</b> 968:22 <b>five</b> 652:5,13 653:3 731:9 761:3 763:4 765:15 766:1 781:16 788:9,9 811:17 813:9,21 862:15 862:15,17,20 867:17 868:9 871:2 877:9 881:13 884:4 910:18 917:7 935:10 953:13 965:13 966:3 983:13 <b>fix</b> 636:18 <b>flatten</b> 949:10 <b>Fletcher</b> 791:7 <b>Floor</b> 634:6 <b>Florida</b> 711:6 738:2 790:16 870:5,7 882:13 <b>Florida's</b> 713:12 <b>fly</b> 872:7 <b>flying</b> 636:9 795:12 <b>focus</b> 903:3 943:3 <b>focused</b> 798:2 812:8 901:16 <b>Fodel</b> 864:10 <b>follow</b> 903:11 <b>follow-up</b> 726:19 981:9 <b>followed</b> 919:14 967:16 <b>following</b> 707:1 727:14 727:14 735:20 744:16 749:14 760:22 812:17 882:18 <b>follows</b> 644:5 679:12 733:16 751:7 790:7 893:20 <b>footnote</b> 652:16,16 687:1 687:3 <b>force</b> 813:8 860:20 869:14 870:8 <b>forces</b> 870:10 <b>foreclosed</b> 720:15 <b>foregoing</b> 987:3 <b>forensic</b> 774:19 781:21 783:13 786:4,6 <b>forever</b> 871:8	<b>forget</b> 818:7 833:21 916:20 <b>forgot</b> 758:15 766:17 <b>forgotten</b> 784:1 <b>form</b> 707:8 782:16 <b>formed</b> 861:2 865:10 <b>former</b> 734:19 738:1 790:21 863:5,12 882:13 890:6 <b>forms</b> 786:11 <b>forth</b> 645:7 709:12 761:4 765:10 783:3 878:15 975:15 <b>Fortune</b> 734:16 <b>forty-seven</b> 939:8 <b>forward</b> 732:3 762:15 955:9 <b>found</b> 652:10 674:19 682:4 692:13 693:19 698:9 771:14 783:6 818:3 838:7 854:7,8 872:15 964:11 968:1,2 <b>foundation</b> 775:11 829:17 <b>founded</b> 647:21,22 648:1 <b>four</b> 678:18 745:13 760:4 760:15,15 762:4,14 764:8,10 765:16 771:16 778:5 781:6 791:11 867:10 868:12 876:18 886:18 908:10 910:17 913:13 917:7 935:10 950:4 953:13 965:5,13 966:3 <b>fourth</b> 767:16 835:21 <b>Fox</b> 633:12 635:12 636:5 636:14,15 637:3,10,13 638:4,8 639:18,20 641:5,11 642:1,4 654:6 660:15 661:22 665:22 707:20,21 708:2 709:7 709:9,16 713:19,21 714:9 726:18,20 727:3 727:12,18 728:1,16 731:2,4,10 749:17 770:9 771:2,4,20,21 772:19,21 776:14 780:16,20 781:1,2,3 783:22 784:5,11,13 785:4 787:8,9 801:21 803:22 805:10 807:3,4 809:15 818:12 835:11 835:12 836:5 837:7 839:1,9,11,12,18,19 840:2 842:5 843:4,11 843:12 845:22 846:3	847:18,20 848:15,16,17 849:2,19,21 850:2,10 850:11 852:12,16,18 853:5,10,15,17,20,21 854:22 855:3,6 856:21 857:8,18,19,21 858:13 858:16 904:17 914:19 920:5,6 929:10 930:1 935:4 942:20 943:2 949:19,22 954:11,14 956:11 960:11,14,18 962:12,15 963:5 965:8 968:7,10,19 969:15 971:13 974:11 981:10 984:14,17 985:19,21 <b>Fox's</b> 636:4 846:20 919:8 <b>fraction</b> 782:20 <b>frame</b> 726:12 763:17 858:19 <b>France</b> 875:6 <b>frank</b> 762:6 <b>frankly</b> 764:20 777:10 983:19 <b>fraud</b> 653:7 779:12,15,19 781:9 783:6,7,9 799:20 817:1 854:17,20 867:8 929:13,14 930:11,12,12 930:15,16,20 932:1,16 932:17,18,19,20 933:1 934:2,2,6,16 936:8 937:8,9 939:3,4 941:7 942:1,6 955:7 960:9 963:18 965:16 971:1 <b>fraudulent</b> 642:18 941:1 950:11 959:3 <b>fraudulently</b> 940:20 <b>Frazier</b> 952:9 <b>free</b> 758:10 773:20 811:9 941:4 984:3 <b>freeze</b> 719:14 <b>French</b> 860:20 <b>frequency</b> 926:3,10 <b>frequently</b> 651:17 652:4 <b>Friday</b> 747:6 <b>Friess</b> 799:3 833:21 <b>frivolous</b> 666:16 668:15 668:20 669:17,21 670:1 671:3,8,13 675:14 684:17 685:18,19,21 689:5,15 692:19 693:15 697:4,14,19,21 700:15 702:20 707:9,15 708:16 716:19 721:17 722:18 722:20 723:10 922:4,6 <b>front</b> 649:5 710:4 717:10 718:13 747:11 953:5	<b>froze</b> 678:17 709:16,17 713:19,22 <b>frozen</b> 839:17 <b>fruit</b> 917:15 918:20 <b>fruitful</b> 917:15 953:12 <b>Fulani</b> 676:18 <b>full</b> 638:5 642:2 725:7 786:10 <b>function</b> 935:20 <b>funnel</b> 800:6 <b>funneling</b> 825:3,5 <b>funnels</b> 800:17 <b>further</b> 673:14 707:3,18 710:8,11 728:16 749:9 749:10,16 779:9 781:20 785:4 787:7,9,10 792:16 839:5 857:16 917:16 942:18 953:13 971:16 987:10 <b>futile</b> 643:3 667:10
<b>G</b>			
		<b>G</b> 636:1 <b>G-Man</b> 875:10 <b>gain</b> 744:13 <b>Gallenthin</b> 933:4,12,16 962:17 <b>garden-variety</b> 703:18 721:15 <b>Gas</b> 757:5 <b>gathered</b> 953:4 <b>gathering</b> 855:11 <b>Gee</b> 884:2 <b>general</b> 657:11 702:4 738:2 753:22 777:16 850:16 859:11,14 860:19 861:15 862:2 882:13 936:15 972:3 <b>General's</b> 860:20 865:13 <b>generally</b> 778:4,12 795:20 859:22 860:1 947:5 <b>generated</b> 774:14 <b>generic</b> 843:17 855:4 897:20 <b>gentleman</b> 748:11 770:12 784:15 887:10 <b>geographic</b> 958:12 <b>geographical</b> 955:2 <b>George</b> 814:14 933:4 <b>Georgia</b> 652:8 823:17 830:14,18 831:14 832:8 832:10 850:20 851:8 854:2,5,6,7,11 855:16 856:15,15,18 950:13 974:18 976:21 980:12	

<p><b>Germany</b> 791:5,13 792:5 <b>getting</b> 758:7,8 800:7 834:5,15 849:20 885:1 891:19 902:6,8 974:15 975:8 977:21 <b>giant</b> 747:22 <b>gigabits</b> 762:5 <b>gigantic</b> 882:21 <b>girl</b> 869:1 <b>gist</b> 760:9 <b>Giuliani</b> 631:6,16 635:13 637:7 639:12 645:3 647:6 657:19 658:12 659:15 660:4 661:18 664:15,20 666:6,11,11 669:3 672:16,22 698:11 706:4,18,22 708:22 709:13 717:5 724:13 725:12 740:9,13,18 741:3,6,6 748:15 766:20 772:15 773:4,7 773:11,12 777:16 793:4 796:1 799:19 800:17 801:2 804:20 821:10,16 840:17 842:10 858:22 859:1,3,8 866:22 875:21 905:6 910:6 914:14 918:7 919:4 920:8,14 921:1,21 925:13 929:9 942:11 954:19 955:19 956:7 957:6 960:17 961:8,11 963:2 972:1 978:3,9 <b>Giuliani's</b> 653:6,10 654:1 666:15 668:2,6,15 680:8 699:20 700:13 724:9 772:11 773:3 920:3 <b>give</b> 672:16 675:8 679:16 708:8 721:9,12 729:17 729:19 733:5 734:16 750:18 755:18 760:18 762:2,20,20 763:3,5,11 763:20 778:3 789:19 810:8 812:11 816:5,22 820:12 825:11 828:22 829:17 832:18,19 835:3 861:18 862:8 867:13,20 880:21 881:2 892:21 925:10 929:15 956:17 966:17 979:3 <b>given</b> 652:21 664:9 740:7 745:2 772:11 816:5 825:19 857:12 871:7 873:7 883:19 894:13 905:14 917:8 918:11</p>	<p>939:4 941:15 944:11 952:20 958:19 964:11 964:12 <b>giving</b> 648:22 672:15,20 708:4 716:16,20 763:18 799:18 800:2 983:19 <b>glad</b> 666:9 <b>glitches</b> 781:10 <b>go</b> 637:15 641:5,10 649:10 658:18 661:21 670:16 675:17 676:15 676:19 677:13 678:1 680:11 681:9 682:13 686:6,21 687:17 691:17 713:9 715:15 723:5,22 732:3 735:5 736:8 738:5,11 742:13 744:22 761:7,15 764:18 765:10 765:19 768:14 777:14 786:9,9 801:11 805:18 807:13 829:18 832:14 833:6 836:16 837:2,2,3 838:10 842:14 843:21 846:21 848:11 850:6 859:8 874:11,16 878:13 879:13,16 884:15,20 885:12,12 887:2,16,18 887:18 888:2,7 894:15 904:3 907:3 912:16,20 926:17 934:14 944:14 944:14 949:19 975:3 976:3 977:22 983:6 984:13 985:2,6,10,11 985:15 986:6 <b>goal</b> 769:8,10,16 <b>god</b> 733:7 750:20 789:21 810:10 895:8 <b>goes</b> 673:14 688:20 758:1 774:21 777:11 849:9 881:21 <b>going</b> 648:8 649:10 680:3 691:2 701:22 710:1,2,7 711:20,22 712:7 718:10 718:18,19,22,22 721:21 735:4 744:1,2 745:22 749:4 760:22 762:15 764:3 770:10 771:9 773:10 774:3,4 777:2 777:11,13 788:16 794:16 795:15 796:18 797:7,16 805:1,18 806:1 819:14 821:17 824:18 825:10 847:5 853:15,16 856:4 857:7 857:8,11 858:14 876:16 878:14 880:4 884:12</p>	<p>890:10,11 891:21 893:11 894:17 898:8,9 908:6 909:9 910:7 915:8 918:1,17 919:9 926:6 927:3,5 935:5 938:17 945:7 954:2 962:13 965:5 970:7 975:14 981:22 982:5,7 982:13,22 <b>gold</b> 642:16 <b>good</b> 636:2 654:15,16 671:19 688:14,16,18,20 703:3 733:20,21 751:11 751:12 752:4,18 789:14 809:16 820:6 871:8,19 891:16 925:19 928:19 950:8 955:17 971:2,9 <b>good-faith</b> 669:4 670:4,5 670:10,15,18 672:3,12 680:7 686:3 698:11 703:20 704:22 941:20 <b>goodness</b> 868:13 870:1 888:6 891:2 902:14 <b>Gore</b> 692:22 693:6,15 699:2,5 710:20 711:3,4 712:11 713:12 717:16 717:21 718:2,6,16 883:10 <b>gospel</b> 876:15 <b>gotten</b> 873:11 883:19 889:5 903:19 <b>government</b> 812:16 816:14,18 848:6 849:6 863:4 875:6 <b>Governor</b> 861:1 870:6,9 874:5 <b>graduate</b> 753:3,6 <b>grand</b> 802:8 815:8,10 <b>grant</b> 663:15 <b>granted</b> 646:16 648:6 663:11 726:5 747:14 816:9 <b>granting</b> 643:2 <b>graph</b> 779:3 <b>graves</b> 848:12 <b>great</b> 636:13 855:15 863:9,10 869:10 874:20 909:10 <b>greater</b> 659:21 721:10,12 870:22 <b>greatly</b> 869:19 <b>Grec</b> 845:5 <b>Greco</b> 845:5 <b>grew</b> 862:4 <b>grievance</b> 666:21 921:10 <b>gross</b> 916:3</p>	<p><b>ground</b> 711:1,5 758:6 799:16 800:9,11 833:11 833:12 953:12 <b>Groundhog</b> 752:5 <b>group</b> 758:20 760:19 763:2 775:7 811:1,1,3 865:7 894:5 967:21,22 971:3,10 <b>groups</b> 756:2 775:4 <b>growing</b> 884:6 <b>guard</b> 745:19 <b>guess</b> 638:13 645:3 654:22 658:18 691:19 718:9 720:22,22 725:12 725:14 807:18 863:13 876:9 921:16 <b>guidance</b> 698:18 <b>guide</b> 736:14 875:18 <b>guiding</b> 711:1 796:17 860:11 <b>guilty</b> 815:18 934:10 <b>gun</b> 813:20 <b>guy</b> 896:21 <b>Guyana</b> 812:4 <b>guys</b> 764:8 769:22 840:13 840:14 856:3</p> <hr/> <p style="text-align: center;"><b>H</b></p> <p><b>hac</b> 659:17 664:16 <b>half</b> 775:6 879:1 894:6 902:22 <b>Hamilton</b> 633:12 781:2 <b>Hampshire</b> 735:4 <b>hand</b> 742:18 938:12 <b>handed</b> 828:21 893:3,4,4 <b>handle</b> 716:17 863:18 881:8 <b>handled</b> 863:5,17 867:16 <b>handling</b> 664:22 903:2 <b>Hank</b> 654:14 <b>happen</b> 730:21 781:11 939:6 983:11 <b>happened</b> 714:7 715:7 717:16 738:13 742:4,16 744:19 746:22 751:17 760:20 781:8 792:15 868:13 870:2 878:8 892:7 908:6 909:17 910:16 911:13 939:5 952:9 963:22 964:1 975:21 <b>happening</b> 795:9 <b>happens</b> 697:2 <b>happy</b> 864:19 874:8 <b>harbor</b> 649:11 <b>harboring</b> 641:21</p>
--	---	---	--

<p><b>hard</b> 704:20 709:21 795:14 <b>hat</b> 714:17,21,22 <b>Haynesworth-Murrell</b> 978:6 <b>Haynesworth-Murrell</b> 633:5 726:15,16 750:1 858:4 978:8,16,21 979:6,20 980:2,4,13,20 981:1,3 <b>head</b> 670:16 737:15 862:16 876:19 884:9 938:15 955:2 <b>head's</b> 983:19 <b>heading</b> 821:17 <b>headings</b> 826:3 <b>headquarters</b> 736:20 739:20 793:16 822:7,14 834:20 879:17 880:7 887:3 888:3,4 892:6 896:3 <b>heads</b> 689:2 862:15 873:13 <b>hear</b> 654:13 705:18 706:1 713:22 750:14,15 752:4 752:6,9,16 789:10,12 798:13 802:13 810:5 835:13 836:3,4 888:13 <b>heard</b> 776:20 783:14 784:16 798:15 809:7 835:14 836:2,6 852:15 852:17 879:12 890:3 946:8 978:12 <b>hearing</b> 631:3,15 632:1,2 633:2 706:1 708:10 710:4 787:12 809:2 902:7 934:19 935:19,22 960:6 966:4,10 970:21 971:19 978:6 981:14 983:7 986:11 987:3,6 987:10 <b>hearings</b> 861:1 977:22 <b>hears</b> 789:15 <b>hearsay</b> 730:9,13 771:21 777:3 <b>heavily</b> 877:7 <b>heavy</b> 765:6 <b>heavyset</b> 737:13 <b>heck</b> 878:13 <b>held</b> 640:16 668:5 676:2 679:12 685:5 693:7 695:19 700:22 740:15 861:1 <b>hell</b> 895:1 <b>Hello</b> 781:3 789:10 <b>help</b> 691:5 733:7 736:2</p>	<p>742:1 750:20 759:7 789:21 810:10 816:14 835:6 880:3 883:21 893:11 973:15,22 982:4 <b>helped</b> 870:10 874:9 <b>helpful</b> 806:13 892:13 982:13 984:18,19 985:1 985:4 <b>hereto</b> 987:12 <b>Heritage</b> 775:11 <b>heroic</b> 813:17 814:7 <b>heroism</b> 814:3 875:16 <b>heros</b> 874:2 875:19 <b>hesitant</b> 684:11 <b>Hey</b> 770:1 <b>Hicks</b> 662:11,17 799:13 895:9,10,11 896:8,10 896:11 <b>Higgs</b> 791:7 <b>high</b> 745:13 <b>high-jackers</b> 865:10 <b>higher</b> 713:5 786:7 871:19 <b>higher-level</b> 786:12 <b>highest</b> 870:19 875:5 890:4 <b>highest-profile</b> 926:16 <b>highlight</b> 638:6 641:6,9 709:7 <b>highlighted</b> 642:3 687:20 <b>highlights</b> 861:18 862:9 862:10 867:21 <b>highly</b> 712:17 895:3 <b>Highway</b> 864:6 <b>Hillary</b> 879:5 <b>hired</b> 783:12 879:4 <b>historical</b> 877:1 978:2 <b>Historically</b> 948:4,5 <b>history</b> 662:7,9 664:20 800:5 <b>hit</b> 874:5 <b>HN</b> 732:20 <b>Hoc</b> 631:3 632:2 633:2 <b>hold</b> 639:3,5 675:7 734:19 735:10 752:20 760:16 790:17 829:16 829:16,16 939:10 982:15 <b>holding</b> 677:1 705:7 <b>holds</b> 694:14 695:6 811:19 <b>hole</b> 868:15 <b>home</b> 790:16 821:21 <b>Homeland</b> 791:16 814:9 <b>homes</b> 937:3,3 <b>homicide</b> 868:4</p>	<p><b>HON</b> 634:3,4 <b>honest</b> 781:9 854:3 <b>honestly</b> 692:10 693:2 796:18 <b>Honor</b> 682:16 683:2 710:12 717:21 771:10 787:20 804:14 814:3 858:13,20 <b>honorary</b> 873:16,21 <b>honored</b> 814:4 875:18 <b>honorific</b> 873:20 <b>hope</b> 716:11 876:6 <b>hopefully</b> 636:10 805:7 <b>HORRELL</b> 633:14 809:14 <b>horribly</b> 903:20 <b>host</b> 791:22 <b>Hotel</b> 822:11 <b>hour</b> 901:10 976:15 <b>hours</b> 663:12 817:4 886:2 983:13 <b>house</b> 741:11 817:10 819:3,3 824:17 834:12 <b>Hughes</b> 662:18 663:5,11 <b>human</b> 835:17 <b>hundred</b> 828:5 868:2 883:15,17 911:1 925:22 926:12 934:21 952:16 <b>hundreds</b> 801:6,8 <b>husband</b> 894:1</p> <hr/> <p style="text-align: center;"><b>I</b></p> <hr/> <p><b>I-q-b-a-l</b> 644:1 <b>ID</b> 844:18 <b>idea</b> 658:16 714:7 839:14 841:16 849:11 854:1 898:5 899:12 954:3 <b>identical</b> 924:1 <b>identification</b> 784:4 <b>identified</b> 637:14 758:14 767:12 913:14 958:2 <b>identify</b> 748:9 758:17 767:8 781:8 923:17 <b>identifying</b> 965:3 <b>ignore</b> 644:11 <b>ignored</b> 864:19 <b>III</b> 633:12 <b>illegal</b> 642:18 <b>illustrate</b> 918:13 963:15 <b>illustrative</b> 971:5,11 <b>image</b> 974:19 976:8 <b>imagine</b> 709:21 723:15 723:16 794:13 831:2 <b>imagined</b> 723:15 <b>immediate</b> 896:4 <b>immediately</b> 735:20</p>	<p>884:9 896:20 <b>Immigration</b> 860:6 926:19 <b>impact</b> 717:4 <b>impacts</b> 716:18 <b>impartiality</b> 780:13 <b>impeachment</b> 876:11 877:4,12 878:6 <b>implement</b> 694:15 695:7 696:13 <b>implementation</b> 693:7 <b>implicates</b> 692:4 <b>implied</b> 852:12 <b>impliedly</b> 684:2 <b>implore</b> 807:20 <b>important</b> 713:2 738:11 828:21 897:7 <b>impose</b> 651:4,18 698:19 <b>imposed</b> 648:4 864:13 <b>impossibility</b> 783:8 <b>impossible</b> 745:16 868:5 871:20 908:20 911:6 940:7 946:6 952:21 <b>impossible-to-describe</b> 874:2 <b>impressed</b> 915:2 <b>imprisonment</b> 819:4 <b>improbable</b> 908:21 <b>impromptu</b> 742:19 <b>improper</b> 641:2,16 647:20 651:14 <b>improprieties</b> 831:1,1 854:17,19 <b>improved</b> 872:18 <b>improvement</b> 871:17 <b>impured</b> 941:5 <b>inaccurate</b> 915:21 916:17 929:3 953:2 <b>inapposite</b> 682:5 <b>incarceration</b> 817:19,22 818:18 <b>incentivized</b> 835:2,4 <b>include</b> 803:2 899:14 974:3 <b>included</b> 637:19 700:19 950:17 951:1 976:11,13 <b>including</b> 654:2 897:15 918:12 928:12 963:16 975:21 <b>inclusion</b> 676:6 <b>incomprehensible</b> 939:5 <b>inconsistencies</b> 831:5 <b>inconsistent</b> 928:9 <b>incorrect</b> 671:12,18 672:2,10 <b>indecipherable</b> 760:12</p>
---	--	---	---

<p>852:19 953:17 <b>independent</b> 686:19 705:14 719:19,21,22 721:4 928:17 <b>independently</b> 763:10 <b>index</b> 843:3 <b>indicate</b> 951:10 <b>indicated</b> 667:6 687:14 <b>indication</b> 688:12,13 982:11 <b>indicative</b> 764:1 <b>indicted</b> 815:15 <b>individual</b> 645:19 696:2 698:16 737:8 743:4,8 746:2 862:21 922:9 961:20 962:4,7 <b>individually</b> 860:13 914:7 <b>individuals</b> 656:5 739:14 748:7 760:1,19 767:8 767:21 771:15 840:21 961:22 <b>ineligible</b> 676:6 677:11 <b>infallible</b> 699:16 <b>infer</b> 934:2,5,8,10 937:9 939:4 <b>inference</b> 934:11,16 970:15 <b>influence</b> 807:22 <b>information</b> 652:3,3 761:22 772:12,14 795:2 799:19 800:3,17 824:15 824:16,17 825:3 827:15 827:20 829:5 836:7 837:20,21 841:19 842:2 855:10,22 856:16 902:8 902:13 904:1 905:8 910:14 911:18,18 912:3 916:15 917:5 918:8 919:5 938:11 945:13 950:3 957:20,20 967:17 <b>informed</b> 945:5 950:8 <b>initial</b> 650:1 659:10 724:7 724:16 728:10 760:18 764:17 765:20 766:11 766:15 816:16 <b>initially</b> 772:21 775:6 <b>initiate</b> 648:12,16 <b>initiative</b> 720:6 <b>injured</b> 922:22 924:8,22 927:12 <b>injury</b> 639:6 675:8 679:13 712:5 <b>inmate</b> 819:16 835:2 <b>input</b> 923:7 <b>inquire</b> 925:7 927:4</p>	<p><b>inquiries</b> 831:22 <b>inquiry</b> 661:8 827:4 831:7 877:12 <b>inside</b> 746:9 <b>insight</b> 820:12 <b>insights</b> 816:22 <b>insisted</b> 840:17 <b>inspect</b> 949:8 <b>inspector</b> 883:7,8 <b>inspectors</b> 882:20 <b>instance</b> 755:9 757:13 774:16 783:2 <b>instances</b> 851:9 936:16 <b>instinct</b> 903:6,12 <b>instinctual</b> 919:13 <b>institute</b> 655:22 656:1 <b>insufficient</b> 650:18 719:8 <b>insulting</b> 855:7 <b>intake</b> 824:13 <b>integrity</b> 742:2 773:17 774:9 775:17 786:20 <b>intelligence</b> 769:5 <b>intended</b> 930:8,9 982:12 <b>intent</b> 650:16 661:11 713:14 930:17 <b>intention</b> 780:3 <b>interest</b> 712:7 754:9 <b>interested</b> 755:8 758:3 759:6,11 760:10 907:8 980:5 987:13 <b>interesting</b> 763:9 770:3 786:13 <b>interests</b> 924:1 <b>interference</b> 713:18 751:14 <b>Interior</b> 812:13,14 <b>interject</b> 716:15 <b>international</b> 820:13 941:10,16 942:2 <b>INTERPOL</b> 860:10 <b>interpret</b> 696:15 <b>interpretation</b> 673:17 678:14 679:2 693:19 696:21 698:14 699:3,8 699:9,11,13 <b>interpreted</b> 694:19 695:14,14 696:8,16 710:22 722:6 <b>interpreting</b> 673:16 697:12 <b>interrupt</b> 736:7 831:11 <b>interrupted</b> 798:10 <b>interrupting</b> 766:5 <b>interrupts</b> 751:14 <b>introduced</b> 906:10 913:14</p>	<p><b>introduction</b> 709:6,8 765:12 766:2 773:18 776:17 781:7 <b>invalid</b> 892:1 940:22 <b>invalidates</b> 853:3 <b>investigate</b> 792:16 857:12 904:3 953:13 <b>investigated</b> 815:13 <b>investigating</b> 829:7 902:20 <b>investigation</b> 793:2 815:7 815:9,10,14 822:3 824:9 827:3 830:19 831:14 842:3 852:3,8 854:15,18 876:10,11 903:8 913:22 917:16 976:21 <b>investigative</b> 791:20 792:1 823:6 851:22 <b>investigator</b> 800:4,15 824:7 825:1 839:13 841:18 847:22 <b>investigators</b> 800:11,12 828:5,6 830:12,16 837:15 839:8 845:14 855:12,22 903:14 <b>invitation</b> 667:5,5 <b>invited</b> 667:1,13 775:7,9 775:12 <b>invoked</b> 926:10 928:20 <b>invokes</b> 934:9 <b>invoking</b> 722:22 <b>involved</b> 749:8 753:11,16 754:22 757:14 769:1 781:9 794:15 797:19,20 820:18 822:17 824:4 832:4,5 834:5 876:4 877:16 879:10,11 883:9 896:8 898:7 973:2 975:13 <b>involvement</b> 724:9 819:19 <b>involves</b> 712:3 713:3 <b>involving</b> 681:21 692:3 877:12 896:4 926:22 <b>Iqbal</b> 644:1,3,4 <b>Iraq</b> 812:14,16 <b>irregularities</b> 764:13 799:19 920:1 925:1 <b>IRS</b> 782:16 785:17 786:8 786:15 <b>ISIS</b> 865:12 <b>Islamic</b> 820:7 865:10 869:9 <b>island</b> 812:21 814:3 872:2,4,6,7 874:16</p>	<p><b>isolated</b> 872:6 <b>issue</b> 637:18 639:16 644:20 646:11 651:22 657:14 671:6 700:4 704:9 708:9,18 711:16 722:5 771:9 772:20 836:10 837:10 922:19 924:3,21 933:20 <b>issued</b> 646:15 650:11 661:2 889:10,11 <b>issues</b> 638:3 645:6 655:1 669:14 674:11 714:19 755:5,8 756:20 805:14 818:7 881:5 894:20 935:9 983:22 <b>It'll</b> 787:18 <b>Italian</b> 863:4 <b>Italian-American</b> 863:1 <b>item</b> 786:11 957:19,20 <b>Ivan</b> 865:2</p> <hr/> <p style="text-align: center;"><b>J</b></p> <hr/> <p><b>Jacques</b> 875:6 <b>JAG</b> 792:5 <b>jail</b> 743:13 744:1,6 745:20,22 812:21 872:4 <b>Jailed</b> 819:12 <b>Jailer</b> 819:12 <b>James</b> 844:3 856:13,14 <b>Jared</b> 834:16 <b>JASON</b> 633:14 <b>Jay</b> 633:7 876:20 877:3 <b>JD</b> 790:19 <b>Jenna</b> 834:18 884:7,8 886:8,9 893:20 <b>jeopardy</b> 729:20 <b>Jeremy</b> 748:15,17,19 891:4 892:8,13 964:5 964:10,18 <b>Jersey</b> 931:20 <b>JIM</b> 634:20 <b>job</b> 719:10,12 824:10 871:18,19 937:13 <b>jobs</b> 735:5,7 754:7 835:7 <b>Joe</b> 799:3 833:19 879:5 880:1 893:22 894:1 900:13,13,15,16 901:8 952:9 <b>John</b> 634:3,14 635:9 750:12 751:4 784:16 844:6 877:1 905:13 <b>joined</b> 791:16,18 894:6 <b>joining</b> 662:19 <b>joint</b> 869:12,13 889:1 <b>JON</b> 634:17 <b>Jordan</b> 811:17,21</p>
--	--	---	---

<p><b>Jordan's</b> 811:18 <b>Joseph</b> 845:5,5 <b>journalist</b> 791:17 <b>Journey</b> 819:15 <b>judge</b> 637:5 649:5 650:9 650:11 651:2,3 660:3 660:19 661:2,7,21 662:6 663:10,14,19 665:22 666:5,15,19 667:1,8,15,19 668:4,11 668:18 669:2,7,11 673:3,4,9,12,15,20 674:2,18 675:1,3,9,21 676:2,22 678:14 679:2 680:13 681:5 682:4 686:11 694:19 695:13 695:13 696:7,15 697:3 698:9 700:12,18 706:7 708:15 709:4,11 746:10 746:13 751:12 791:3 885:19 889:5,9 898:22 917:9 943:17 945:11 950:5 969:3,6 971:2,9 973:10 <b>judgeleventhal@aidala...</b> 634:9 <b>judges</b> 648:13 651:3,18 652:4 <b>judgment</b> 777:8 <b>judicial</b> 645:9,11 652:5 928:16 <b>judiciary</b> 834:14 <b>jumps</b> 764:12 769:13 <b>June</b> 881:9 <b>Jupiter</b> 790:16 <b>jurisdiction</b> 705:13,14 706:8 722:22 884:22 895:4 898:8 904:2 947:6 <b>jurisdictional</b> 684:8,9 <b>jurisdictions</b> 869:4 881:4 884:6 899:14 911:14 958:16 974:3 976:2 <b>jury</b> 815:9,10 <b>justice</b> 684:7 686:17 730:9 811:7 812:5,8,9 815:13 816:21 817:15 819:1,4 859:19 860:2 861:2,3 <b>justices</b> 718:12 720:1,12 720:13 <b>justification</b> 670:3 <b>Justin</b> 740:5</p> <hr/> <p style="text-align: center;"><b>K</b></p> <p><b>Kaiser</b> 676:17</p>	<p><b>Kamins</b> 634:4,5,15 636:6 654:8,9,12 660:17 678:3,6 682:13 683:3,6 683:8 686:21 687:2,17 687:19 691:17,20 693:22 694:2 707:18 708:3,14 710:9,11 716:14 719:14,16 727:6 727:11,16 728:17,19,22 729:6 731:14,18,22 732:2,15,17,21 733:10 733:11,19 746:14 748:16 749:15 750:6,9 751:1,2,10,13,16,22 752:2,15 766:8,10 767:4,6 770:17 771:3,8 771:10,13,19 772:9,22 773:11,15 774:2,6 776:12 777:6,15,22 778:2 780:12,18,19 785:7,10 787:7 788:11 788:19,20 789:2 804:21 858:21 859:7 904:5,9 904:14,19,22 905:4,5 906:1,5,8,22 914:10,13 914:15 915:9,14,17 916:22 917:2 918:4,6 919:1,3 920:2,10,17,21 920:22 923:9,12 924:17 929:20 930:18 942:18 954:13 960:11 962:13 968:17 971:15,16 981:10,11,19,21 982:3 982:19 <b>Katherine</b> 799:3 833:20 <b>Kearns</b> 662:13,19 663:2 663:5,20 666:10 737:17 799:12 895:20,22 <b>Kearns'</b> 663:15 <b>keep</b> 827:4 828:1 851:15 851:19 891:18,22 982:14 <b>keeping</b> 689:9 <b>Ken</b> 898:4 <b>Kenrick</b> 844:17 <b>kept</b> 663:19 884:5 891:15 <b>Kerik</b> 635:11 800:3,14 804:13,19 807:6 810:1 810:3,4,18,19,20 811:1 811:2 820:16 829:21 836:8,15,19 837:13 839:6 842:20 843:16 846:15 850:13 855:14 857:7,8,9,11 858:6 871:21 872:10 873:17 874:3,9,11 902:18,19</p>	<p>913:18 950:16 <b>kill</b> 865:17,18 921:16 <b>killing</b> 865:19 <b>Kim</b> 631:22 632:3 987:2 987:16 <b>kind</b> 646:7 661:10,10 688:22 692:22 703:6 707:11,13 712:3,7 715:21 722:1 741:13 780:4 792:22 795:6 796:16 797:15 800:6 823:14 861:22 874:13 881:16,20 889:4 892:16 908:19 921:19 928:2 947:17 967:2 <b>kinds</b> 704:7,19 711:20 720:15 <b>king</b> 811:17,20 873:22 926:21 <b>knew</b> 764:8 796:19,20,21 803:15 821:1 880:2,12 880:13 890:8 895:16 896:16 903:2,5 912:11 915:3 918:1,19 921:3 <b>knight</b> 873:17,21 <b>knighted</b> 814:4 873:15 <b>knighthood</b> 873:16,19 <b>know</b> 638:14 640:12 641:9,22 648:8 661:22 668:12 679:21 686:1 688:22 689:2 690:2 691:1 698:1,22 701:7 703:4 704:16 709:19 713:6,16,21 715:16,19 716:22,22 717:1,16 718:2 719:7,17,18 721:1,19,20 723:14 724:19,20 725:22 726:9 737:14 740:20 741:19 745:5 748:11,19 754:17 758:10,11 760:4 762:18 764:21 772:1,4 775:2 776:5,7,17,21 780:2 783:15 792:18,20,21 793:8,20 794:16 795:4 795:9,10,13,16 796:21 802:8,14,16,17 806:6 807:5 814:7 820:2,20 820:21,22 823:1,22 824:1,4,4,10,11,19 826:18,22 828:2,11,17 831:2 837:17 838:3,4,5 838:7,12 841:11,17 843:7 845:9 846:22 848:2,10,14,19 849:3 849:11,12 851:19</p>	<p>854:14,16 855:19 857:7 858:15 865:11,12 867:19 870:1 873:10 874:10,11 880:3 881:11 881:21 883:14 884:17 885:17 886:8 888:21 889:10,11,12,13 890:5 890:13,22 891:7 892:16 894:18 895:1 896:1 897:14 898:6 899:6,9 902:15 903:17 909:2,9 911:21,21 915:5 916:9 919:21 921:13 928:18 938:22 943:5 944:17 945:2 946:17 950:21 952:5,8 954:6 957:13 957:14 960:7 970:1,11 972:7 973:11 978:22 980:8,9,18,19 982:22 983:10 <b>knowingly</b> 921:2 <b>knowledge</b> 718:4 757:5 760:5 846:2 869:11 <b>knowledgeable</b> 776:10 <b>known</b> 644:8 820:20,22 864:22 865:3 880:17 <b>knows</b> 896:21 <b>Koch's</b> 864:3 <b>Kushner's</b> 834:16</p> <hr/> <p style="text-align: center;"><b>L</b></p> <p><b>lack</b> 718:1 <b>lacks</b> 638:22 <b>LaGuardia</b> 872:8 873:6 <b>laid</b> 919:22 940:8 <b>landscape</b> 702:18 <b>language</b> 638:9 641:13 689:11 693:19 695:3 696:8,21 697:12 698:15 699:4 890:12 897:7 898:12 973:21 <b>laniard</b> 745:3 <b>large</b> 725:8 745:8 747:8 747:20 755:10 866:11 867:15 868:14,15 870:2 882:20 905:11 915:20 916:11,16 917:12,13 971:6 <b>largely</b> 867:5 869:7 870:16 971:4 <b>larger</b> 683:7 691:19 737:13 916:5 <b>Las</b> 864:16 <b>lasted</b> 815:9 <b>lastly</b> 767:17 <b>late</b> 947:12 976:19 984:9</p>
--	--	---	---

<p><b>Laura</b> 895:19,21 <b>law</b> 640:14 642:13 646:8 647:21 651:15 653:5,9 653:13,18 654:1,19 656:4 668:2,6 670:4,5,6 671:18 674:15 676:3 679:22 680:9,16,16 681:7,8 703:22 704:2,3 704:12,13 706:2,8,17 714:15,17 715:11,12 716:2 721:2,3,3 741:17 786:17 790:19,20 791:9 805:19,20 806:8,10,15 818:14,17 819:20 820:11 867:14 874:17 909:2 921:6,11,19 925:20 926:3 928:1,15 928:19 948:19 972:9,14 973:14 975:6 983:16,20 <b>laws</b> 941:5 <b>lawsuit</b> 657:13,21 665:5 674:14 705:20 715:21 725:6 922:4 <b>lawyer</b> 648:2 763:15 772:3 780:3 796:4 876:9 877:5 879:12 889:2 890:7 894:17 895:6,7 926:5 956:2,6 956:15 973:10,14 974:15,15,16 <b>lawyers</b> 702:14 729:4 779:17 794:21 797:9 828:7,8 876:18 879:4 881:3,8 893:11 894:3,7 894:12,14,19 895:8 903:15 928:12,12 951:2 974:18,21 <b>lay</b> 644:6 779:16 927:20 941:9 <b>layperson</b> 765:3 779:18 <b>lays</b> 641:12 643:7 644:4 <b>lead</b> 642:16 800:14 <b>leader</b> 761:4 762:18 <b>Leaders</b> 818:17 <b>leading</b> 904:18 <b>leads</b> 647:1 <b>learned</b> 724:8 944:21,22 <b>learning</b> 874:20 <b>leave</b> 643:2 749:1 794:17 873:7 971:3 977:7 980:7 <b>leaves</b> 916:5 <b>leaving</b> 792:21 794:22 795:1 <b>leeway</b> 721:10,13 <b>left</b> 739:19 749:7 791:6,6</p>	<p>822:12 861:14 867:2 877:2 886:8 894:15 930:4,7 979:15 <b>legal</b> 670:1 671:6 702:12 709:12 737:6 786:17 793:2,8 794:14,20 796:13,22 811:7 821:17 824:20 837:16 877:5 878:4 889:4 892:4 982:12,12 983:18 <b>legally</b> 707:9 <b>legislation</b> 928:17 <b>legislative</b> 881:16 928:17 <b>legislature</b> 686:19 694:10 694:14 695:6 696:12 698:21 719:19,21 720:8 721:4 928:15 <b>legislatures</b> 977:22 <b>legitimacy</b> 758:22 785:22 <b>legitimate</b> 781:19 783:1 887:12 919:18 953:16 <b>lengthy</b> 799:6 <b>let's</b> 639:11 641:5 642:1 648:18 650:1 658:19 686:6 715:2,3,3 717:17 717:17 784:17 788:2,3 788:8 804:15 807:1,2 825:15 850:6 885:20 899:13 900:1,1 904:11 914:13,13 915:14 943:6 945:8 949:19,20 951:14 952:11 954:15,16 967:8 974:1 984:10,10 985:14 986:7 <b>letters</b> 864:17 928:10 <b>letting</b> 732:19 750:11 789:8 810:2 890:17 <b>level</b> 665:4 786:8 <b>levels</b> 786:16 <b>Leventhal</b> 634:3 682:15 683:1 729:1,7,10 731:1 732:5 787:17,18 788:6 788:15,17,22 789:5,12 789:15 790:2,10 798:12 798:16,17 801:19 804:2 804:3,12,17 805:3,16 806:3,14,19 807:19 808:3 809:5,7,11,20 810:13,16 818:10,13,16 825:8,14,21 826:1,11 826:13,19,21 827:11,13 829:18,20 830:5 832:18 832:20 835:8 836:3,13 836:14,16,18 837:2,5 837:12 838:21 839:4 842:9,14,19 843:9</p>	<p>846:11,14 847:15 848:15,20 850:6,9 853:1,9,12 854:12 857:2,6,10,16 858:10 858:12,17 906:20 924:15 982:20 983:4 984:12,15 985:6,9,15 <b>Leventhal's</b> 982:11 <b>Lewandowski</b> 635:8 731:18 732:4,18 733:1 733:3,13,20 734:9 750:3 882:2,12 970:14 <b>liberties</b> 702:7 <b>life</b> 873:3 <b>lifetime</b> 875:11 <b>light</b> 814:22 815:1,1 953:18 957:1 <b>limit</b> 717:22 <b>limitations</b> 918:12 <b>limited</b> 675:10 676:4 677:2,11 783:6 785:12 785:12 <b>limiting</b> 756:5 782:2 <b>Linda</b> 662:13,19 737:17 799:12 895:21,22,22 <b>line</b> 705:7 717:7 756:3 765:11 780:9 786:11 843:3 907:21 908:1 978:10 <b>lined</b> 881:7 <b>lines</b> 727:19 <b>linguistics</b> 790:19 <b>Linish</b> 863:14 <b>link</b> 762:2 764:7,10 <b>linked</b> 856:1 <b>list</b> 745:2 766:17 836:11 839:6 840:4 841:2 847:1,21 848:12 850:18 850:20 851:12 856:17 892:9,14,21 909:8 912:16 926:17 964:7 <b>listen</b> 667:9 963:2,5 <b>listened</b> 882:3 <b>lists</b> 840:22 841:3 <b>litany</b> 735:6 <b>literally</b> 803:13 883:2 <b>litigate</b> 879:4 927:5 <b>litigated</b> 640:14 655:4 793:9 862:12 881:4,14 972:11,17,18 <b>litigating</b> 796:4 <b>litigation</b> 650:9 655:10 663:6,16 686:17 689:8 717:9 724:12 791:10 824:5,9 828:14 851:1,4 851:5 852:1,1,11</p>	<p>867:17,19 875:22 877:16 878:16 881:7 896:4 903:8 921:22 922:2 973:22 <b>litigations</b> 796:2 <b>litigator</b> 714:21 716:21 939:7 <b>litigators</b> 711:2 717:1 <b>little</b> 661:1 672:6 691:19 713:16 722:5 724:10,19 727:19 736:14 795:14 804:13 830:6,7 835:14 837:4 842:15 862:9 868:21 880:19 881:1 898:12 904:18 940:17 940:18 973:17 978:19 <b>live</b> 922:11,12 936:22 986:9 <b>lived</b> 820:3 845:6 877:8 <b>lives</b> 855:16,17 <b>living</b> 844:17 <b>LLC</b> 811:1 <b>LLM</b> 790:20 <b>lobby</b> 933:12 <b>local</b> 799:16 894:3,7,11 895:14 900:18,19 926:12 <b>locating</b> 830:17 <b>location</b> 741:20 745:15 958:12 <b>locked</b> 874:4 <b>Lomanaco</b> 951:20,22 952:2,12,16 <b>long</b> 788:4 800:4 804:13 804:13 815:22 820:22 821:3 884:13 912:11 920:6 949:13 972:12 982:20 <b>long-held</b> 679:14 <b>long-standing</b> 713:13 <b>longer</b> 647:3 947:6 949:4 949:12 <b>look</b> 642:1 644:12 655:18 675:17 681:9 704:13,18 709:3 720:14 723:8 759:10 761:20 762:9,11 763:21 764:2,11,11 769:12 778:9 780:7 783:7,9 785:17,22 821:17 826:2 828:12 897:7 903:9 907:20 910:9,10 931:14 941:18 951:14 952:8 954:15,16 959:16 964:18 968:17 975:3 <b>looked</b> 639:19 677:19</p>
---	--	--	--

745:10 747:19 769:22 916:18 917:20 944:15 944:15 <b>looking</b> 680:3 761:13 764:6 792:17 819:1 823:15 826:6 847:5 852:1 854:16 883:12,12 885:2,3 949:18 <b>looks</b> 770:1 809:17 849:9 907:20 <b>Lorenz</b> 951:17,20 <b>lose</b> 873:18 <b>loses</b> 925:1 <b>losing</b> 940:18 <b>loss</b> 675:7 679:15 <b>lost</b> 640:14 784:2,7,8 867:7 907:10 922:21 970:17 <b>lot</b> 725:17 754:12 755:11 757:20 758:6,6,10,11 764:19,21 765:3 768:2 768:3 769:1 777:20 779:21 783:14 792:15 792:20 796:15 797:3,3 800:2 801:5,18 820:2 828:11,17 832:4 864:1 864:22 869:21 872:21 875:15 881:3 887:7 890:7,21 896:17 903:6 903:19 919:7,9,20 949:17 950:9 983:20 <b>lots</b> 854:5 937:3 <b>Louis</b> 855:16,17 <b>love</b> 873:1,2 <b>lower</b> 711:2 718:2 <b>lowest</b> 870:18 <b>lowly</b> 972:3 <b>luckily</b> 862:19 <b>lunch</b> 804:14 <b>luncheon</b> 808:6	966:20 <b>mail-in</b> 692:2,2 838:15,16 840:4 847:8 849:14,18 916:4 918:16 930:14 933:9 935:9 936:11,15 936:17 938:8,12 948:20 949:4 <b>mailed</b> 849:18 852:13,14 937:2 <b>mails</b> 853:4 <b>main</b> 769:6 799:6 800:3 825:4 861:10,10 894:4 894:5 976:22 977:1 <b>mains</b> 800:16 <b>maintain</b> 687:22 <b>Majesty</b> 811:17 <b>major</b> 822:21 859:17 875:3 <b>majority</b> 720:13 <b>makeshift</b> 747:9 749:13 <b>making</b> 669:4 670:17 671:20 672:4,12 686:3 691:10 697:2 698:12 819:2 831:22 873:3 881:15 918:14 919:19 922:6 953:11 982:5 <b>malfunction</b> 965:11,16 <b>malfunctioning</b> 966:14 <b>man</b> 776:19 874:12 <b>management</b> 754:2 811:22 869:7 <b>manager</b> 734:22 740:3,4 754:6 <b>Mandarin</b> 822:11 <b>mandated</b> 651:4 <b>mandates</b> 701:1 <b>manner</b> 924:4 <b>mantle</b> 754:13 <b>manufacturer</b> 754:4 <b>March</b> 876:6 909:9 913:2 <b>Maria</b> 766:20 <b>Marine</b> 791:3 792:7 <b>Mark</b> 664:3 884:18 <b>marked</b> 784:3 <b>Marks</b> 680:14,21 681:4 681:13,14,17,20 682:5 682:10 683:10,16 684:2 799:13 <b>Marriage</b> 926:21 <b>Marshal's</b> 866:5 <b>marshals</b> 860:4,13 <b>Mary</b> 925:14,20 <b>mass</b> 817:18,22 <b>Massachusetts</b> 735:15 <b>Master's</b> 735:11 <b>masters</b> 790:19	<b>Mastriano</b> 783:15 <b>material</b> 646:2 674:1 828:10,12 831:6 <b>materials</b> 778:7 950:17 <b>math</b> 776:11 <b>mathematics</b> 753:1 <b>MATINPOUR</b> 634:11 <b>Matt</b> 799:4 <b>matter</b> 631:5 636:7 637:9 646:21 656:12,17,22 657:4,8 659:17 666:20 705:14 865:21 871:8 878:4 911:5 973:16 978:2 985:16 <b>matters</b> 653:3 655:8 753:16,17 756:12 757:6 972:10,15 <b>maximum</b> 652:13 811:19 <b>mayor</b> 740:13 741:3 793:4 800:7 821:16,22 822:10,15,15 824:7,8 824:13 825:3 828:14,17 828:19,22 833:15,19 838:4 864:2,3 867:1,6 867:11,21 868:7,19 869:1,8,9,20 870:6 871:1 873:1 874:19 875:8 <b>mayor's</b> 824:22 828:18 869:5 <b>McGee</b> 662:12,17 <b>Meadows</b> 884:19 <b>mean</b> 649:19 668:19 674:4,7 689:16 698:10 714:14 716:20 717:8 719:9 747:21 776:18,19 777:8 782:17 787:3 795:13 800:12 802:10 803:10,15 813:5 823:11 829:14 833:5 837:9 877:17 880:16 883:6,11 884:20 885:15 886:9 887:12 889:12 892:8 896:17 901:19 902:15 902:22 903:2 907:8 913:17 915:3 925:21 927:10 929:5 931:3 947:17,18 948:11 949:13 952:7,7 957:20 961:5 963:22 966:7 968:22 973:1 974:5 978:10 979:13 <b>meaning</b> 648:15 665:2 667:13 675:2 711:4 742:8 865:19 896:18 901:14	<b>meaningful</b> 698:18 782:7 <b>meaningless</b> 786:2 <b>means</b> 688:14 843:13 911:6 941:12 975:12 <b>meant</b> 727:21 974:7,10 <b>mechanically</b> 636:17 <b>medal</b> 813:19 814:1,3 <b>meet</b> 643:19 644:19 736:17 737:3,5,19 793:11 816:20 895:13 <b>meeting</b> 645:22 775:6,12 775:19 <b>meetings</b> 749:12 775:3 823:3 <b>Meghan</b> 634:21 787:22 <b>member</b> 631:8 633:6,8 754:20 775:7 776:3 792:5 924:7 969:21 <b>members</b> 768:3 775:18 789:6 862:22 863:2 864:3,17 865:6 866:11 870:7 <b>Memorandum</b> 688:5 <b>Memories</b> 754:3 <b>memorizing</b> 874:21 <b>memory</b> 675:18 730:1 737:16 741:9 818:9,11 <b>mention</b> 813:17 <b>mentioned</b> 701:3 737:17 757:21 829:10 841:5 871:21,22 887:11 975:5 <b>mentions</b> 933:3 <b>Mercer</b> 748:12,19 891:2 891:3,4,4 964:5,10,18 965:4 <b>Mercer's</b> 891:2 <b>meritorious</b> 813:22 <b>messaging</b> 734:17 <b>Messinas</b> 677:6,16 678:4 <b>met</b> 643:15 736:12,20 737:7 739:14 822:10,15 891:3 895:19 896:2 927:9 957:4 <b>metal</b> 939:19 <b>methodology</b> 846:18,22 849:12 <b>methods</b> 676:13 <b>Mexico</b> 797:21 798:3 802:12 <b>Michael</b> 865:2 872:18 <b>Michigan</b> 652:9 725:21 797:21 798:2 801:15,17 802:11 823:17 894:17 895:7 899:19 974:15 976:6 980:12 <b>microphone</b> 682:19
--	--	--	---

<p><b>mid-afternoon</b> 904:7 <b>middle</b> 754:2 820:4 <b>Migliori</b> 645:2 <b>Mike</b> 737:2 887:11 <b>military</b> 791:7 819:20 <b>Milken</b> 865:2 <b>Miller</b> 844:1,16,16 855:16,17 <b>million</b> 800:13 <b>millions</b> 864:4 <b>mind</b> 656:15 661:9 681:11 684:3 772:11 773:4,8,14 777:5 807:17 827:5 828:1 842:10 851:19 920:15 928:21 <b>mine</b> 912:4 <b>minimum</b> 652:12 <b>Minister</b> 812:14 <b>minor</b> 694:6 <b>minute</b> 664:21 899:4 <b>minutes</b> 731:9 743:6 749:3 788:6,9 872:3,13 904:12 983:13 984:3 <b>mirror</b> 782:18 974:19 976:8 <b>mischaracterize</b> 765:9 <b>mishear</b> 695:12 <b>misinterpret</b> 722:9 <b>mislead</b> 930:9 <b>misleading</b> 782:14 <b>missed</b> 791:11 929:4 <b>missiles</b> 866:10 <b>missing</b> 809:14 874:6 <b>mistakes</b> 781:10 <b>misunderstood</b> 695:1 696:19 <b>Mitchell</b> 775:4 <b>mitigation</b> 807:12 983:7 <b>Mm-hmm</b> 877:20 888:16 889:14 896:15 937:10 <b>mobilized</b> 791:12 <b>model</b> 872:16,17 <b>modification</b> 670:5 <b>Mohawk</b> 754:5 <b>moment</b> 682:15 713:4 769:4 787:19 795:21 840:16 <b>Monolithic</b> 754:3 <b>monster</b> 747:22 <b>month</b> 878:22,22 <b>months</b> 657:14 697:10 726:9 816:2 877:9 <b>Moore</b> 856:13,14 <b>moot</b> 646:18 647:2 <b>morning</b> 636:2 654:15</p>	<p>700:21 731:9 733:20,21 736:11,12 738:4 742:10 751:11,12 752:4,18 821:21 822:2,12 823:3 877:19,22 891:5 896:22 906:10 929:10 979:16 984:8 985:19 986:2 <b>mornings</b> 822:11 <b>mother</b> 762:19 <b>motion</b> 642:7 648:7,12 649:2 650:4,5,17 659:16 663:11 688:6 700:6 726:4 <b>motivated</b> 868:22 <b>motive</b> 641:21 <b>move</b> 777:13 827:11 835:9 843:9 847:15 854:6 920:4 967:8 <b>moved</b> 649:14 662:17 663:5,8 872:11 <b>movie</b> 865:4 <b>moving</b> 747:12 853:12 <b>multi</b> 830:18 864:4 898:9 <b>multi-district</b> 973:21 <b>multi-jurisdiction</b> 898:10 <b>multi-jurisdictional</b> 802:8 <b>multiple</b> 936:16 <b>multiply</b> 935:17 <b>Multistate</b> 850:17 <b>multitude</b> 939:4 <b>municipalities</b> 712:21 <b>Munson-Ware</b> 646:22 <b>Murrell</b> 749:22 <b>mute</b> 682:19 809:6 <b>Mycofskish</b> 863:13</p> <hr/> <p style="text-align: center;"><b>N</b></p> <p><b>N</b> 635:1 636:1 809:1,1,1 <b>name</b> 731:20 734:10 737:2,11,12,14,17,19 740:3,5 745:1 748:12 748:13,17 758:16 766:17 781:2 799:14 810:17 814:16 815:2 818:8 839:13 841:14 843:22 844:3,6 850:20 863:12 901:1,3 925:18 936:18 <b>named</b> 799:13 875:7,8 876:19 <b>names</b> 760:2 784:12 836:11 838:12 843:16 843:17 844:14 851:6 855:5,12 856:1,18 881:3 894:13,20,21,21</p>	<p>894:22 895:3 913:1 919:7,8 936:21,22 <b>nanny</b> 814:19 815:15 <b>narrow</b> 678:13 679:2 <b>narrowing</b> 679:12 <b>narrowly</b> 855:1 <b>nation</b> 802:7 <b>nation's</b> 819:20 <b>national</b> 735:1 790:20 791:11 811:6,18,22 812:15 <b>nationally</b> 753:16,17 <b>nationwide</b> 816:21 <b>Naturalization</b> 860:6 <b>nature</b> 664:9 727:7,9 745:6 753:17 756:7 769:2 812:10 818:2 834:11 838:1 <b>Naval</b> 735:13 <b>Navarro</b> 911:19,21 913:12 <b>Nazi</b> 863:13,13 <b>Nazis</b> 863:5 <b>NCIT</b> 775:17 <b>near</b> 970:4 <b>nearest</b> 640:9 <b>necessarily</b> 668:12,19 671:4,9,15 697:15,21 698:10 706:13 721:5 796:3 947:8 <b>necessary</b> 710:3 983:20 <b>necessity</b> 699:1 <b>neck</b> 745:4 <b>need</b> 636:3 675:22 698:16 711:6 759:13 770:11,14 776:7 880:3 943:5 944:16 985:5 <b>needed</b> 793:8 828:15 838:5 866:5 888:10 <b>negatively</b> 717:4 <b>negotiate</b> 871:9 <b>neighborhood</b> 703:9 755:20 793:15 <b>neither</b> 960:20 961:16 987:8 <b>Nestle</b> 755:14 <b>Network</b> 713:18 <b>never</b> 642:17,19 668:5 681:2 747:8,13 783:18 802:12 833:6 879:6 885:2,6 889:20 891:14 894:20 909:9 917:22 921:7,7,12,12,13,18 927:9 933:14 935:19 938:17 945:12 954:6 959:15,15 960:2 961:9</p>	<p>964:19 965:6 972:11 977:1 980:12,21,21 <b>new</b> 634:7,7 678:2 703:1 721:7 735:3 754:1 755:4,9,15,22 767:18 797:21 798:2 802:12 810:21 812:18,21 813:7 861:13,17 862:3,16,17 864:7 867:1,11 868:11 869:15,22 870:20 871:6 872:5 873:2 874:21 877:12 879:2 931:20 947:17 <b>news</b> 791:17,19 793:5 797:18 <b>newsletter</b> 757:22 758:1 758:2 760:3 <b>newspaper</b> 966:21 <b>newspapers</b> 849:9 <b>NH</b> 731:20 <b>nice</b> 954:22 <b>Nichol</b> 844:6 <b>Nick</b> 740:6 <b>night</b> 636:8 821:20 878:8 907:17 950:12,14 976:3 977:9 979:9,10,12,14 <b>nine</b> 637:16 641:7 730:10 <b>Ninth</b> 675:6,18 676:3,12 676:22 677:1,16 678:4 678:8,11,20,21 679:11 680:9,15 681:7 <b>noises</b> 720:2 <b>Nominate</b> 656:7 <b>nominated</b> 814:9 <b>nominations</b> 860:12 <b>non-fraud</b> 643:9 <b>nonbinding</b> 983:6 <b>noncompliant</b> 787:1 <b>nonfrivolous</b> 653:5,9,13 653:18,22 668:1,5 674:15 678:16 679:4,8 679:9 685:13 693:4 722:3 <b>nonpartisan</b> 969:17 <b>nonuniform</b> 698:19 <b>normality</b> 770:2 <b>normally</b> 891:6 <b>North</b> 757:4 767:15 775:15 <b>Northern</b> 652:8 <b>Notary</b> 632:4 987:1,17 <b>note</b> 663:8 666:9 690:7 700:3 <b>noted</b> 646:13 662:10,16 662:22 663:4 680:13 701:4 936:10,14</p>
---	--	--	---

<p><b>notes</b> 892:11 <b>notice</b> 640:13 645:12 646:4,5 648:22 650:16 653:14 655:16 664:3,16 665:15 690:10,14,17 691:4 694:8,15,20 695:7,9 698:16 843:2 843:15,15,20,20 855:4 855:9 954:21 958:12 <b>noticed</b> 655:7 <b>notified</b> 740:6 <b>notify</b> 985:17 <b>notion</b> 676:4 <b>notwithstanding</b> 661:12 <b>novel</b> 702:8 704:16,17 705:3 <b>November</b> 650:2,13 658:8,14,20 659:5,7,8 662:10,16,22 663:4,17 664:2,12 666:6 735:17 736:15 739:2,3 744:9 744:17 757:18 772:12 793:20 801:3 821:16 827:7 833:13 877:15 898:22 933:6,7,18,19 938:6 <b>number</b> 631:11 652:18 654:19 655:8,10,13 658:5,10,16 665:22 691:11 706:17,18 781:21 782:15 784:1 800:8 803:6 812:5,6 814:6 820:10,10,10 821:6 822:20 823:4,16 823:20 835:1,12 839:15 845:5 854:8,10 864:7 865:5 866:11 870:3,11 882:20 883:18 884:5,8 886:10,11 890:18 893:21 900:4 905:11 910:2 911:3,3,22 912:7 915:20 916:3,5,10,16 917:13,22 918:11 919:6 931:6,7,17 932:10,12 932:14,15 939:8 958:10 959:4 964:8 965:19 971:6 <b>numbers</b> 725:1 776:7,9 776:11 782:17,21 785:15,19 786:1,2 841:10,15 844:21,22 856:10 907:13 912:17 918:15 966:17 <b>numerous</b> 775:21 925:15 <b>nuts</b> 703:17 <b>NW</b> 633:16</p>	<p><b>NYPD</b> 813:20</p> <hr/> <p><b>O</b></p> <p><b>O</b> 636:1 809:1,1,1 <b>o'clock</b> 979:17,17 984:2 985:20 986:2 <b>oath</b> 859:4 873:4 978:1 <b>Obama</b> 817:12 834:6,11 926:18 <b>obituaries</b> 849:10 <b>object</b> 716:15 770:9 835:12 836:12 842:5 845:22 846:8 920:6 <b>objected</b> 771:2,4 <b>objection</b> 773:11 776:14 818:12 837:7 848:20,20 850:3 852:16 853:5 856:22 857:1,4,5 904:17 914:19 968:21 <b>objective</b> 661:5 670:15 670:18 688:16,18 715:12 716:5,10 <b>obligation</b> 983:15 <b>obligations</b> 873:6 <b>observation</b> 640:20 706:10 <b>observational</b> 653:19 701:1 704:10 968:21 <b>observe</b> 933:8,14,20 964:12,17,21 <b>observed</b> 935:9 965:20 <b>observer</b> 933:6,17 934:22 935:3,8 941:12 961:21 962:5,7 963:12 <b>observers</b> 639:14 942:6 949:16 955:3 <b>observing</b> 699:22 942:5 <b>obstructing</b> 640:5 <b>obtained</b> 847:1 <b>obviously</b> 689:1 716:22 771:21,22 796:10 800:4 <b>occasion</b> 702:4 729:12 <b>occasions</b> 817:11 <b>occur</b> 676:14 <b>occurrence</b> 661:11 <b>occurrences</b> 652:14 <b>October</b> 987:21 <b>odd</b> 972:13 <b>offer</b> 652:19 684:11 771:9,11 946:14 <b>offered</b> 651:14 771:3,18 773:1,2,3 776:18,21 920:15 958:6 983:10 <b>offering</b> 772:10,17 955:16 <b>office</b> 634:22 636:19</p>	<p>738:10 743:9 749:11 786:9 793:11,13,18 794:7,9,11 800:10,12 815:8 816:19 831:8,11 832:22 834:16 835:16 835:19 839:22 840:4 860:4,7 862:4,5 869:5 869:22 878:2 886:9 901:7 924:2 935:8 <b>officer</b> 695:19 735:3 744:5 813:6 890:4 987:2 <b>officers</b> 738:18 869:21 870:3 <b>offices</b> 860:4 870:6 880:18 935:3 <b>official</b> 859:18 891:9 933:17 939:14 <b>officially</b> 875:7 <b>officials</b> 742:8 818:21,22 890:15,17 933:10 <b>offline</b> 832:4 <b>offset</b> 823:4 <b>oh</b> 678:19 691:18 696:14 696:14 704:3 709:20 714:9 718:21 719:16 728:22 741:2 746:14 780:20 794:10 826:7 827:12 830:4 832:21 834:19 840:19 856:3 888:6 894:13 895:13 903:10,10 907:2 913:17 932:11 943:22 959:13 979:1 980:20 <b>Ohio</b> 730:7,11 <b>Oil</b> 757:4 <b>okay</b> 636:13 637:22 638:20 639:11 640:21 642:11 644:22 649:4 650:7,15 651:1 659:9 659:15 661:21 665:16 667:14 674:10 680:13 688:7 706:16 707:17 708:12 709:15,20 711:11 714:8,22 715:1 722:14 725:10 728:7 730:6 732:2 734:11 737:19 738:5 742:3 751:16 752:18 754:8 757:17 761:2 763:13 765:22 766:8 767:3 771:5 777:19 782:11 783:22 784:19 788:2,8 789:1,11,14,17 790:17 790:21 792:9 793:6,12 794:2 797:6 798:16</p>	<p>799:18 804:15,22 807:1 807:8,8 809:4,7,22 816:10 820:16 826:5,8 827:10 829:10 830:4,9 831:17 832:18 833:16 834:4,21 838:17 840:16 842:14 843:18 845:9 847:7 849:21 850:3 853:10 856:21 858:18 861:11 866:15,19 872:22 876:17 882:9,11 886:11 896:20 898:17 900:1,9 901:5 903:16 904:19 905:4 910:13 911:9 912:19 913:3 914:6 915:8 931:1,17 932:10 940:11,14 943:13 945:19 953:19 967:8,20 968:15 970:6 971:12 973:16 980:20 981:2 982:3 985:13 <b>old</b> 836:22 916:3 951:16 952:17 <b>older</b> 954:7 <b>Omnibus</b> 688:5 <b>once</b> 746:9 756:20 861:15 882:3 884:12 890:18 922:20 <b>one-eight</b> 787:4 <b>one-eighth</b> 786:22 <b>one-plaintiff</b> 926:2,9 927:22 <b>ones</b> 642:14 676:19 723:18 725:17 779:5 799:15 852:5 861:10 862:13 865:1 871:19 875:18 881:11 890:20 903:3 970:20 971:4,5 <b>ongoing</b> 830:20 852:8 854:15,15 <b>online</b> 832:1 <b>open</b> 689:9 788:12 949:6 949:7,9,10 <b>opened</b> 939:16 <b>opening</b> 706:9 710:5 732:11 808:4 826:5 905:1 939:20 <b>operated</b> 862:15 <b>operative</b> 811:20 <b>opinion</b> 637:5,8,15 640:22 643:22 645:1 647:1 650:12 653:4 672:15,16 673:7 679:4 679:7,17 683:9 684:4 684:12 689:12 694:19 695:15,19 697:8 708:4</p>
---	---	---	---

<p>708:8 709:5,10 710:20 716:16,20 720:10 721:18 863:11 889:17 889:19,19 945:6 <b>opinions</b> 653:3 675:18 <b>opponent</b> 648:19,21 <b>opportunity</b> 694:8 727:12 806:6 857:12 938:18 958:20 964:12 964:16 982:21 983:14 983:17 <b>oppose</b> 772:7 <b>opposed</b> 904:18 <b>opposing</b> 648:6 984:4 <b>opposition</b> 863:9 <b>Oprah</b> 875:8 <b>optimism</b> 805:3 <b>optimistic</b> 805:1 <b>option</b> 651:2,2 928:19 <b>oral</b> 663:16,22 664:5 665:2,21 680:20 772:12 902:2 943:16 944:1,5,7 982:6,7 986:3 <b>orally</b> 889:16 915:2 <b>order</b> 646:15,22 651:11 661:3 691:5 742:11,14 742:18,21 743:14,18 746:8,11,12,16,18 778:14 874:7 887:5,16 889:5,9,16 970:15 <b>ordered</b> 983:10 <b>orders</b> 652:21 <b>organization</b> 757:13 775:5,16,17 <b>organizations</b> 757:2 818:3 <b>organize</b> 762:16 884:21 984:22 <b>organized</b> 864:15 891:2 891:17 <b>Oriental</b> 822:11 <b>original</b> 638:18 658:2,2 663:16 705:19 765:8 845:1 876:11 <b>originally</b> 664:22 736:21 739:13 740:15 887:6 888:2 951:2 <b>Ortiz</b> 634:17 635:4 636:20 637:4 643:4 654:13 669:20 672:14 710:13 724:5,6 726:13 726:17 728:21 729:11 731:6 929:10 <b>OSI</b> 754:4 <b>ought</b> 774:20 915:5 <b>outcome</b> 987:13</p>	<p><b>outer</b> 949:7,8 <b>outlined</b> 662:6,8,8 938:22 971:3,9 <b>outset</b> 687:10 898:2,3 <b>outside</b> 640:8 647:14 740:16 741:4 742:17 835:7 847:4 977:8 <b>Oval</b> 878:2 <b>overall</b> 665:5 868:3 871:13 896:9 <b>overarching</b> 691:1 769:8 <b>overnight</b> 907:12 908:12 <b>overrule</b> 730:10 <b>overruled</b> 730:7 848:21 914:21 <b>overruling</b> 730:18 <b>overseas</b> 791:4 <b>oversee</b> 736:2 859:21 878:16 <b>overseeing</b> 743:5 812:15 824:8,8 <b>overturned</b> 718:5 <b>overturning</b> 670:6</p> <hr/> <p style="text-align: center;"><b>P</b></p> <p><b>P</b> 633:12 636:1 <b>p.m</b> 808:6 809:2 933:13 933:18,19 986:11 <b>packing</b> 794:19 <b>page</b> 637:15 641:5,7,7,10 642:2 682:14 683:4 686:22 687:18 691:18 709:6 727:4 778:9 781:6 826:5 837:3 905:17 906:11,15,17,18 907:4,5 909:14,15,19 909:21 910:1,2,6,7,11 910:14 923:3,18,21 924:10,10,11,11,12 925:20 930:5 931:2,4,5 932:11 935:1,1 937:18 937:19 940:12 960:15 962:8,10 965:9 966:18 968:11,15 <b>pages</b> 694:1 905:18 966:8 <b>paid</b> 796:13 814:20 874:18 <b>paint</b> 901:18 <b>pair</b> 730:5 <b>Pam</b> 737:20 738:1 739:16 740:2 743:22 882:8,12 884:2 887:10 888:15,21 889:1,2 <b>panel</b> 727:15 749:20 752:10 787:11 789:6 802:1 811:15 858:2,5</p>	<p>929:16 930:8,22 983:2 <b>paper</b> 647:14,17,19,19 889:22 899:22 934:5 942:7 974:13 977:15 <b>papers</b> 795:11 907:10 <b>paragraph</b> 638:5 639:19 641:6,9 642:2,9 691:18 691:21 700:19 923:3,8 923:13,17,18 924:13,14 930:6 931:6,7,16 932:10,12,14,15 934:7 934:20 936:3 937:12,21 939:8 960:12 961:7 962:10 965:9 966:18 967:8 968:6,12,13,15 968:17 970:12,17 <b>paragraphs</b> 709:8 725:1 929:16 930:21 938:20 938:21 940:10 941:17 957:22 958:13 960:16 960:20 961:17 963:7 <b>Paralegal</b> 634:11 <b>paralegals</b> 903:14 <b>paraphrasing</b> 744:1 <b>pardon</b> 816:10 860:6 976:12 <b>part</b> 674:4 680:4,5 707:1 711:8 763:14 799:6 828:14 830:19 852:7,10 854:17 861:21 868:9 895:14 911:20 915:12 915:12,16,18 916:14 917:4 918:8 919:5 961:10 971:8 982:16 <b>participant</b> 882:14 <b>participate</b> 775:19 793:10 870:8 875:2 <b>participated</b> 749:12 863:1 877:6 <b>participation</b> 665:5 724:21 877:10 <b>particular</b> 675:11,20 679:19 682:2 686:15 691:16 699:15 701:21 704:5,15,16 705:6 712:5 716:18 746:21 747:14 755:17 766:19 838:22 905:16 958:21 <b>particularly</b> 702:12 937:7 955:13 <b>parties</b> 632:6 648:6 803:21 927:12 981:10 983:14 987:9,12 <b>partisan</b> 641:21 967:20 <b>partner</b> 813:20 <b>parts</b> 765:14</p>	<p><b>party</b> 645:18 648:15,19 648:21 649:1,2 676:5 693:20 699:21 883:8 922:22 923:16 924:1 969:21 <b>pass</b> 756:4 949:9 <b>passed</b> 778:7 834:5,8 848:5 <b>passes</b> 806:1 <b>Pat</b> 863:9 <b>Pataki</b> 870:9 874:6 <b>patchwork</b> 691:22 <b>pattern</b> 934:12,14 940:8 <b>pause</b> 825:13 <b>PC</b> 634:5,15 <b>pen</b> 891:13 <b>Pennsylvania</b> 638:16 640:16 645:10 664:11 693:20 695:18,21 696:1 697:6,9 698:2,5 702:3 703:15 735:19 761:19 763:16 778:14 781:16 782:2 783:11 785:2 797:20 798:5,19 799:2 799:8,17 800:9,11 801:10,13,16 803:2,7 803:14,18 823:17 830:13,18 831:12,14 832:9,13,13,17,21 833:5,7,9,11,18 840:1 844:13 845:6,19,20 850:19 851:8 854:1,7 855:17 856:13,18 881:5 881:11 882:17 885:12 896:19 900:2 901:16 907:18 909:13 911:15 918:21 931:20 933:5,18 941:16 947:10 948:19 963:1 964:11 967:14 969:17 976:5,11,14 977:11 979:7,9 980:5,9 980:14 <b>Pennsylvania's</b> 654:4 <b>Pennsylvanians</b> 854:6 <b>pens</b> 899:21 <b>people</b> 641:21 660:20 684:8 702:13 711:21 713:17 720:12 721:22 722:21 726:2 748:10 754:12,15,17 755:13,14 758:11,11,20 759:14 760:4,13,15,16 761:5 763:4,5 764:8,10 765:16 766:18,19 768:10 770:16 771:22 772:5 775:8 778:8</p>
---	--	---	--

779:17 782:4 784:17,18 785:16 786:22 787:3,4 794:15,18,19 795:1 797:16 800:2,19 820:3 822:16 823:9,12,13,20 823:22 824:14 825:4,5 828:7,11,18 829:6 830:17 836:21 838:10 843:8 848:4,8,11 849:14,17 854:9 855:5 856:3 857:13,13 862:13 863:10 865:1,19 870:11 870:15 874:10 875:17 877:21 879:21,22 880:2 880:12,17 886:6 890:18 892:10,11,12,22 893:1 893:5 900:4 902:7,12 902:14 903:13,19 908:20 913:1 917:18 918:2,21 921:15 934:4 936:21,22 944:18 945:16 948:14 953:14 954:4,20 955:12 957:18 957:19 958:19 959:1,9 959:12,14 961:13 964:3 964:8 966:13,16 969:6 970:2 973:14 974:17 <b>people's</b> 841:9 <b>percent</b> 653:1 868:9 911:1,8 <b>percentage</b> 652:20 782:20 <b>perennial</b> 918:22 <b>perfect</b> 713:16 927:22 <b>perfectly</b> 927:21 <b>period</b> 649:20,22 651:21 652:11,19,22 658:9 660:21 718:3 813:4 814:21 867:18 908:12 912:21 936:15 946:11 949:14 <b>permissible</b> 707:9,14 720:9,11 <b>permits</b> 705:22 <b>permitted</b> 746:9 <b>person</b> 732:7 736:21 759:4 766:16 775:9 783:2 825:2 838:7,18 850:19 851:8 886:16,17 933:3 943:9 949:6 958:8 962:22 963:10 <b>personal</b> 866:12 876:9 985:11,16 <b>personally</b> 656:11,16,21 657:3,7 828:22 863:18 863:19 911:21 938:14	<b>personnel</b> 939:19 <b>persons</b> 931:18 960:21 <b>perspective</b> 715:12 797:2 <b>pertaining</b> 817:21 841:21 <b>pertains</b> 835:21 985:10 <b>pertinent</b> 778:12 <b>petition</b> 649:17 657:5 <b>PHALEN</b> 634:20 <b>phase</b> 983:7 <b>PhD</b> 767:14 776:5 <b>PhDs</b> 759:14,18 760:17 762:14 767:19 768:2 771:16 <b>Philadelphia</b> 736:2,8,18 736:19 737:10 738:3,6 740:14 743:2,9,13 886:1,21 887:2 888:3,9 889:8 890:5,8 893:16 894:15 895:12,15 897:18 908:3 918:3 947:10 952:10 954:9,10 955:14 959:11 961:21 963:12 969:19 970:9,10 974:20 975:15 976:9 979:7,8 <b>Philadelphia's</b> 640:4 <b>Philly</b> 833:12 <b>phon</b> 646:22 863:13,14 864:10 <b>phone</b> 735:21 740:18 745:20 746:1 760:8 823:9 888:19 893:17 903:20 <b>phones</b> 795:11 903:18 <b>photographs</b> 848:12 <b>physically</b> 823:21 940:6 <b>physicist</b> 776:6 <b>physics</b> 753:1,2,14,15 <b>picayune</b> 881:20 <b>picked</b> 760:4 770:6 911:4 911:4 <b>picture</b> 901:18 <b>pictures</b> 745:17 746:1,5 <b>pie-in-the-sky</b> 786:20 <b>piece</b> 872:14 889:22 <b>Pierce</b> 691:12 692:5,8,9 692:12 <b>pile</b> 949:11 <b>Pittsburgh</b> 947:11 959:4 959:11 <b>place</b> 742:2 779:20 793:1 800:19 872:6 911:15 922:21 928:9 932:1,5 933:11 939:21 959:4,5 975:19 <b>places</b> 709:14 800:8	910:19 974:19 978:20 <b>plain</b> 643:12 <b>plaintiff</b> 644:16 645:11 712:5 925:7,19 927:3 927:10 972:14 973:4 <b>plaintiffs</b> 638:2 645:19 653:11 663:1 664:4,17 667:2 674:19,22 675:4 675:6 676:12 680:14 681:6,12,20 683:11 684:17,19 685:13 686:7 687:4,9,21 690:15 691:11 692:18 693:14 693:18 694:13 695:5 696:9,12,16 707:4 716:19 717:15 722:7,11 723:12,18 875:22 876:5 922:10,20 927:11 <b>plaintiffs'</b> 653:15,20 674:14 686:12 689:5 693:15 706:8 707:2 938:10 <b>plan</b> 687:16 689:7,7 <b>planning</b> 667:6 689:19,20 <b>plant</b> 965:1 <b>plate</b> 757:16 <b>plausibility</b> 644:9 <b>plausible</b> 644:17 <b>play</b> 807:2 <b>playing</b> 739:6 <b>plead</b> 955:19,21 956:3 957:7,21 <b>pleading</b> 643:8 644:6,7,8 647:19 660:1 960:4,8,8 965:5 <b>pleadings</b> 669:22 708:16 954:18 <b>pleads</b> 956:15 <b>please</b> 637:12 638:5 640:2 660:16 695:2 709:3 732:16,17 750:10 789:4 809:21 810:1,17 813:18 826:12,12 829:19 830:6 835:10 836:17 837:3,4 842:15 846:12 850:7 852:20,21 854:13 858:11 880:21 892:9 917:1 960:15 962:10 <b>pled</b> 674:20 815:18 945:10 950:5 958:3,7 958:11 970:20 <b>plenty</b> 726:2 925:2 <b>plus</b> 758:9 <b>point</b> 646:20 651:20 653:1 666:6 667:1	696:4,7 704:8 710:5 720:11 731:12 738:5 739:7,22 740:8 742:13 743:8 744:4,12 745:15 746:22 749:9 770:5 773:10 780:3 782:20 783:16 796:2 806:12 809:16 819:19 831:7 855:2 857:5,11 878:17 879:16 881:22 883:5 884:5,14 885:18 887:13 887:20,22 895:17 898:19 918:13 919:8 928:18 929:9 930:1,3,5 932:4 934:18 941:21 945:21 950:2 953:11 961:8 971:11 976:1 983:4,21 <b>pointed</b> 680:22 969:5 <b>points</b> 684:9 908:19 963:16 <b>police</b> 735:3 743:16 744:5 810:22 812:18,19 813:22,22 819:15 820:13 821:2 869:16,21 889:8 890:4,4,5,7,8 <b>political</b> 685:1,7,7 734:4 734:17,18 735:12 740:5 812:6 <b>politics</b> 973:3 <b>poll</b> 639:13 640:5,7,17 745:5 931:11,18 <b>polling</b> 959:3,5 <b>polls</b> 931:19 <b>populus</b> 947:5 <b>Porter</b> 662:12 <b>portion</b> 709:10 727:21 728:3 785:1 961:4 <b>posed</b> 663:21 915:6 <b>position</b> 675:13 679:15 689:1 692:18 693:13 697:1 698:4,6 713:4 715:20 716:11 734:12 759:15 811:2 859:13 869:6 <b>positional</b> 700:10,17 701:22 702:16 703:13 704:4,15 705:5 <b>positions</b> 734:19 735:9 756:22 790:22 817:14 820:5 <b>possessing</b> 755:20 <b>possession</b> 826:15 <b>possibilities</b> 903:4 950:9 <b>possibility</b> 689:21 723:22 <b>possible</b> 644:14 649:6
--	---	--	---

671:21 672:13 685:15 686:1 689:14 690:4 693:2 697:18 701:14 713:7 723:4,6,11,14,16 748:2 763:21 850:18 851:13,13 892:19 944:13 <b>possibly</b> 674:8 <b>post</b> 756:19 879:2 <b>post-election</b> 774:18,20 782:2 881:7 <b>Postal</b> 936:8 <b>postponement</b> 664:5 <b>posture</b> 645:6 <b>potential</b> 675:7 676:5 679:15 799:20 930:4,11 930:12,16 <b>potted</b> 965:1 <b>power</b> 720:7 <b>powerful</b> 941:19 <b>practical</b> 927:15 <b>Practically</b> 649:8 <b>practice</b> 921:20 <b>practiced</b> 791:10 867:14 <b>practices</b> 690:8 <b>practicing</b> 921:11 <b>pre-canvassing</b> 700:1 <b>pre-Election</b> 881:4 <b>precedence</b> 671:13 <b>precedent</b> 671:1,6 672:1 672:2,9,11 688:9 701:15 702:9 703:11 705:7 719:6,7 720:16 721:14 729:14 730:20 730:20 <b>precedents</b> 702:13 <b>preclude</b> 774:4 <b>predecessor</b> 873:5 <b>predecessors</b> 869:18 871:14 <b>preliminarily</b> 981:16 <b>preliminary</b> 806:16,20 807:11,17,22 983:5,6 <b>prep</b> 824:9 852:1,11 <b>preparation</b> 638:19 772:13 885:3 <b>prepare</b> 657:20 659:20 838:3 914:17 <b>prepared</b> 764:17 765:20 771:15 805:17,19 899:2 899:4 951:11 985:2 <b>preparing</b> 770:18 902:6 915:11 <b>present</b> 632:5 634:10 725:14 799:1 935:21 939:12 983:18	<b>presented</b> 700:5 951:3 <b>presently</b> 811:11 <b>presents</b> 710:17 <b>preserve</b> 687:22 <b>preserving</b> 689:13 <b>president</b> 702:11 715:5 734:13 790:14 814:2,13 814:14 816:5 820:19 821:4,18 834:6,9 859:19 860:19 861:4,15 863:7 864:19,20 866:8 867:3,4 873:14 875:4 876:1,8 878:1 879:9 880:22 884:10,18 897:13 922:19,21 932:21 948:13 973:8 <b>presidential</b> 701:17 702:1 702:5 711:7 735:16 757:17 782:19 784:8 787:2 814:2 816:9 880:14,16 <b>press</b> 740:15 741:3 742:19 749:13 833:8 880:14 <b>pressing</b> 975:16 <b>pressure</b> 721:21 779:21 <b>presumably</b> 718:22 966:11 <b>pretend</b> 927:19 973:6 <b>pretty</b> 725:16 762:5 779:4,22 795:17,20 820:6 824:1 855:7 870:4 888:17,19 893:19 902:3 917:6,6 928:5 949:3 951:7 976:7 <b>prevail</b> 928:16 <b>prevailed</b> 971:2 <b>previously</b> 664:5 746:4 871:7 <b>primaries</b> 817:21 <b>primarily</b> 798:1 812:8 823:17 830:14 <b>primary</b> 705:15 774:16 774:17 822:21 823:2,19 824:6 825:1 834:1 923:15,22 <b>Principal's</b> 871:10 <b>principals</b> 721:4 871:6,16 871:17 <b>prior</b> 647:9 695:2,3 734:20 753:20 772:12 772:13 812:12,17 813:5 820:8 834:14 855:21 880:13 896:19 898:22 905:7 921:22 922:1,1 981:22	<b>prison</b> 811:19 812:9 816:1,13,22 817:2,15 835:3 872:16 <b>prisoners</b> 835:3 872:5 <b>Prisons</b> 860:5 <b>private</b> 734:5 810:22 890:7 <b>privilege</b> 941:5 <b>privileged</b> 878:10 <b>pro</b> 659:17 664:16 738:15 <b>probably</b> 743:6 747:11 747:21 749:3 755:2 757:11,15 768:12 778:11 822:22 828:4 843:4 844:12 862:21 864:1 865:3 874:19 889:1 900:14 902:3,4 918:2 919:10 926:12 927:12 953:21,21 968:11 971:10 <b>problem</b> 755:22 854:8 918:22 923:2 954:21 958:17 <b>problems</b> 762:10 852:2 919:20 966:14 <b>procedural</b> 645:6 662:7,9 664:20 698:18 <b>procedure</b> 643:5,6 647:11 661:19 690:15 690:18 693:9 694:9,16 694:20 695:8,10 730:3 <b>procedures</b> 640:13 645:13 648:17 653:15 690:11 698:20 <b>proceed</b> 636:14 733:9 750:22 752:1 790:1 809:10 810:12 <b>proceeding</b> 664:10 733:5 750:18 789:19 810:9 921:19 934:9,11,18 983:9 <b>proceedings</b> 648:12 650:10 665:2 751:15 987:4,7 <b>process</b> 639:13 640:5,6 647:15 688:21 690:9 693:10 699:18 700:9,14 700:17,22 701:15,18,18 702:18 703:1,8,17 704:11,18 706:6 735:18 742:2 749:9 780:14 829:6 894:14 932:22 933:2 937:7 938:11 940:5 960:10 <b>processed</b> 646:1 <b>processing</b> 755:21 933:21	<b>produced</b> 868:11 881:2 950:17 <b>professional</b> 631:2 666:21 672:17,21 708:5 <b>professor</b> 654:13 669:20 672:14 710:13 714:5,16 714:17 721:1 728:20 731:5 929:10 <b>professorial</b> 714:21 <b>professors</b> 656:4 860:22 <b>program</b> 870:14,14 926:19 <b>programs</b> 835:2,4,6 <b>prohibited</b> 948:19 <b>project</b> 755:18 937:17 938:1,3,5,15 967:9,20 <b>prominent</b> 865:1 <b>prone</b> 930:15 <b>prong</b> 927:13 929:4 <b>proof</b> 805:9 <b>properly</b> 689:18,19,19 <b>proposed</b> 755:18 983:15 <b>proposition</b> 638:21 <b>propositions</b> 640:12 701:7 <b>propriety</b> 848:22 <b>prosecuted</b> 862:20,22 863:5 864:6,8,10,21,22 865:5,9 866:3 <b>prosecution</b> 863:2 <b>prosecutions</b> 875:12 <b>prosecutor</b> 865:14 934:3 947:12 <b>prosecutors</b> 818:22 <b>Prosperity</b> 735:2 <b>protection</b> 690:7 692:4 692:19 693:10,18 698:9 706:5 710:16 711:15 718:20 721:3 866:6 933:1,2 937:7 960:10 963:16 <b>protests</b> 738:15 <b>prototypes</b> 865:3 <b>prove</b> 781:9 950:10 957:16 <b>proven</b> 981:17 <b>provide</b> 694:8 698:18,22 <b>provided</b> 650:16 742:7 742:11 745:1,11 825:18 852:6,6 931:21 932:3 <b>provides</b> 705:11 <b>provision</b> 645:21 647:13 705:10 <b>provisional</b> 931:21 958:17,18,21 959:18 961:12
--	---	---	--

<p><b>provisionally</b> 960:22 961:14 <b>provisions</b> 960:5 <b>proximate</b> 924:6 <b>public</b> 632:4 633:6 743:7 746:1 749:6 813:17 832:3 840:10,12 859:9 985:17 987:1,17 <b>publish</b> 819:5 <b>published</b> 654:19 774:22 783:18 849:10 889:13 889:16 912:12 <b>pull</b> 942:15 953:5 <b>purport</b> 946:4,5 <b>purports</b> 951:17,17 952:2 <b>purpose</b> 647:20 651:14 741:19,20 771:12,13 772:17 777:4 920:10,13 938:11 <b>purposes</b> 680:20 905:19 978:2 <b>Pursuant</b> 981:13 <b>pursue</b> 638:22 783:12 867:8 <b>pursuing</b> 919:18 <b>pushed</b> 885:17 893:6 <b>put</b> 636:17 637:10 638:4 639:18 678:5 693:22 714:21 717:3 726:20 745:3,20 759:20 760:10 766:9 774:13 784:2 795:8 818:6 825:10 856:1,4 860:18 869:21 870:9 878:18 880:22 883:3 891:13 892:21 894:12 898:21 903:17 906:1,6 914:10,13,13 915:14 916:22 918:4 919:1 923:9 929:20 932:5,6,6 934:4 935:5 943:5,9 944:6,16 949:20,20 960:14 962:13 966:3,8 974:10 975:17 976:19 978:13 978:17 985:5 <b>puts</b> 872:5 <b>putting</b> 759:7 901:8</p> <hr/> <p style="text-align: center;"><b>Q</b></p> <hr/> <p><b>qualified</b> 770:15 772:6 781:20 <b>Quantico</b> 791:5 <b>quantified</b> 959:20 <b>quarters</b> 903:1 <b>Queen</b> 814:4 <b>question</b> 695:2,3 696:18</p>	<p>704:17 713:12 714:11 715:18 719:2,10 720:8 721:16 725:11 729:1 741:12 758:12 768:15 780:9 782:8,22 802:4 834:22 852:21 854:13 857:7,8,9 858:13 897:1 921:21 930:19 954:11 962:11 963:3,6 964:22 969:11 970:8 972:21 978:9,12 984:12 <b>questioned</b> 661:22 <b>questioning</b> 636:4 727:8 804:21 848:22 982:10 <b>questions</b> 654:7,15 657:11 663:21 666:1,1 707:19 708:13,14 710:8 710:14 716:16 717:7 724:4 726:17 727:14 749:16,17,18,19 773:16 777:16 781:4 785:4 792:15 797:4 801:20,21 801:22 805:12,13 806:4 838:22 846:20 853:16 855:1 857:17,19,21,22 858:3,6 905:6 915:5 942:19 971:14 975:6 981:4 984:11 <b>quick</b> 665:20 925:11 983:9 <b>quickly</b> 649:15 779:22 795:17 895:5 968:13 <b>quit</b> 894:21,22 897:11 <b>quite</b> 690:21 735:8 753:11 757:1,1 762:6 764:20 791:11 792:18 796:19 876:12 912:3 917:11 965:4 <b>quitting</b> 794:18 797:12 <b>quote</b> 666:7 707:2 713:14 806:10 930:4 973:22 <b>quoted</b> 930:6,16 <b>quoting</b> 956:4</p> <hr/> <p style="text-align: center;"><b>R</b></p> <hr/> <p><b>R</b> 636:1 809:1 <b>rack</b> 745:12,12 747:9,12 747:15 748:2 <b>racketeering</b> 864:2,12 <b>radical</b> 820:7 <b>raise</b> 706:5 975:6 <b>raised</b> 679:20 685:17 708:18 <b>raising</b> 692:18 693:17 <b>Raleigh</b> 767:15 <b>ran</b> 812:21 867:6,10</p>	<p>869:8,12,13 876:21 880:12 <b>random</b> 782:12 <b>rank</b> 862:1 <b>ranking</b> 859:18 <b>rate</b> 868:8 870:21,22 871:2 <b>raw</b> 829:11,14 830:13 831:9 832:5 908:14 912:16 <b>reach</b> 644:20 <b>reached</b> 793:7 <b>read</b> 638:18 640:2 641:13 642:11 644:11 647:6 679:6 680:12 692:10 710:2,5 725:7,7 768:12 784:20,22 797:17 803:16 805:20 806:1 830:6 889:19,20 909:1 913:11 940:2 943:21,22 952:1 963:9 967:2 982:12 <b>reading</b> 710:19 711:9,9 777:12 923:4 929:19 <b>ready</b> 636:11 732:3 761:7 761:15 805:12 807:9,11 809:4,9 891:5 955:21 986:8 <b>reaffirmed</b> 678:12,21,22 <b>Reagan</b> 814:2 859:20 860:19 861:15 863:7,11 864:19 <b>Reagan's</b> 866:8 <b>real</b> 875:19 895:8 916:10 927:15 <b>realize</b> 820:3 <b>realized</b> 792:20 884:12 890:19 891:7 <b>realizing</b> 749:3 <b>really</b> 641:9 646:21 655:1 664:21 681:3 716:7 741:12 754:17 768:9 769:17 776:8 796:19 806:8,9 824:19 875:16 884:8,20 887:13 888:9 894:16 895:3 896:5 898:6 902:19 917:22 919:16 927:9 928:8 972:13 976:20 980:21 <b>realm</b> 723:21 770:1 <b>reason</b> 655:19,20 658:4 658:11 677:7 681:11 722:8 905:16 963:6 <b>reasonable</b> 684:16 685:13 699:7,12 706:5 760:5 956:8,21</p>	<p><b>reasoning</b> 667:20 673:12 690:1 692:21,22 693:3 693:5 711:3 <b>reasonings</b> 693:2 <b>reasons</b> 669:8,12,15 722:12,16,18,20 723:3 948:12,13 <b>reasserted</b> 679:14 <b>rebut</b> 934:17 <b>rebuttal</b> 807:6 858:14 <b>rebutted</b> 946:14 <b>recall</b> 728:9 730:15 737:15 741:1 823:7 824:3 833:1,18 854:4 896:12 903:21 906:12 913:16,20 915:18 <b>receive</b> 813:11 842:22 851:2 882:1,7 <b>received</b> 735:21 747:2 772:16 814:1 815:11 826:22 839:6 849:15 863:3 865:13 869:2 873:13 875:5,10,14,16 912:12 943:15,20 <b>receivership</b> 864:13 <b>receiving</b> 905:8 <b>recess</b> 732:13 788:14 808:7 905:3 986:12 <b>recipient</b> 654:3 <b>recognition</b> 813:14 <b>recognize</b> 758:16 <b>recollect</b> 762:4 <b>recollection</b> 675:19 712:11 742:5 746:10,17 <b>recommendation</b> 781:14 781:15,18 806:16,21 <b>recommendations</b> 819:2 912:13 <b>reconvene</b> 986:2 <b>record</b> 656:5 678:5 682:20 731:10 752:14 805:21 809:19 810:17 837:14 853:17,19 865:21 978:2 984:13 985:7,10,12,15 987:7 <b>recorded</b> 849:13 892:18 939:17 952:18 <b>recorders</b> 938:4 <b>recordings</b> 968:2 <b>records</b> 837:22,22,22 842:11 952:13,21 960:22 961:14 <b>recount</b> 693:8 781:17 <b>recourse</b> 892:16 <b>recreate</b> 714:13 <b>recreated</b> 907:10</p>
---	--	--	---

<b>RECROSS-EXAMIN...</b> 729:8 <b>red</b> 907:21 <b>redirect</b> 707:22 727:1,7 727:10,12 785:8 981:5 <b>redistricting</b> 720:4 <b>reduce</b> 818:18 835:4 <b>reduced</b> 868:2,3,4 870:11 872:12 987:5 <b>reduction</b> 862:1 872:19 874:15 <b>refer</b> 674:10 709:5 727:4 829:2 943:6 984:19 <b>referred</b> 638:10 646:10 684:7 960:17 <b>referring</b> 666:20 676:17 711:9 893:10 897:19 906:15 909:19,22 910:1 912:8 923:14 925:12,13 925:14 960:12 <b>reform</b> 655:22 812:9,9 816:22 817:15,18 819:2 860:21 861:3,4 869:2 <b>reformed</b> 871:5 <b>reforms</b> 868:10 <b>refresh</b> 730:1 737:16 818:9,10 819:14 <b>refused</b> 646:11 939:11 942:8 <b>regard</b> 639:4 674:11 690:6,14 699:18 704:9 753:14 774:22 820:14 821:10 831:6 862:6 917:3 <b>regarding</b> 683:12 699:20 799:19 814:7 <b>region</b> 811:21 <b>register</b> 952:17 <b>registered</b> 890:16 893:1 960:3 <b>registration</b> 735:2 738:19 739:15 <b>registrations</b> 965:22 <b>regularly</b> 703:7 874:17 <b>regulates</b> 703:8 <b>rehabilitate</b> 774:5 <b>reinforce</b> 953:15 <b>reiterated</b> 888:17 <b>reject</b> 723:7 <b>rejected</b> 646:7,13 678:13 679:1 686:11 694:6 698:5 703:7,12 <b>rejecting</b> 686:15 <b>rejection</b> 704:18 <b>related</b> 702:13 704:19 705:19 706:2 828:13	935:9 936:11 987:8 <b>relates</b> 785:1 836:10 <b>relation</b> 681:15,18 899:1 <b>relationship</b> 874:13 <b>relative</b> 987:11 <b>release</b> 816:4,12,16 938:6 <b>released</b> 816:15 <b>relevant</b> 965:2 <b>reliability</b> 730:8,13 <b>reliable</b> 968:2 <b>relied</b> 674:2 680:14 681:6 691:11 693:18 905:18 910:13 915:19 916:12 916:14 920:9,14 950:19 <b>relief</b> 707:2,3,9,11,12,13 <b>relies</b> 670:22 671:5,12 672:1,9 <b>relieve</b> 707:1 <b>religion</b> 758:4 <b>rely</b> 702:14 720:4 741:17 913:21 914:17 915:10 917:4 918:8 919:4 927:22 950:3 <b>relying</b> 672:2,10 686:5 692:17 693:14 774:1 911:18 <b>remain</b> 743:8 748:22 <b>remained</b> 666:10 876:12 977:8 <b>remark</b> 956:14 <b>remarkable</b> 874:14 <b>remarks</b> 666:15,16,19 <b>remedies</b> 654:2 706:18 <b>remedy</b> 889:4 927:15 <b>remember</b> 656:14 659:4 663:7 667:4 677:7,18 681:3 682:12 686:14 687:15 691:14 692:10 693:3 710:18 720:19 730:17 737:12 757:11 793:19 796:9 798:19 799:8,10,10,12,13,14 801:6,15 805:17 838:9 841:4 862:13 878:2,22 883:22 884:5 885:9,17 886:6 888:6 895:6 898:5 900:17 903:15 905:15,22 906:18 907:19 916:4 926:7 944:9 948:17 953:3 966:22 967:2,3,4 975:13 <b>remembered</b> 883:10 <b>remind</b> 688:2 859:4 950:12 984:1 <b>reminded</b> 743:14	<b>remit</b> 668:11 673:1 723:5 723:8 <b>remove</b> 746:6 <b>removed</b> 864:14,18 871:18 <b>removing</b> 864:15 <b>renew</b> 776:13 <b>renewables</b> 758:4 <b>Renewed</b> 688:5 <b>repeat</b> 672:5 695:2 890:12 <b>rephrase</b> 852:20 <b>replaced</b> 877:1 <b>Reply</b> 688:5 <b>report</b> 638:19 652:16 654:18 655:5 667:15 673:2,16 674:13 681:15 681:18 690:7 699:19 700:3,20 701:10 706:16 707:8 760:11 763:18 764:17 765:20 766:4,11 766:15,22 767:4,7,9 769:9 770:11,16,19,19 771:1,15 772:1,8 773:6 773:13,19 774:14,19 776:9 777:8,21 782:5 784:2,6,12,20 785:1 905:12,18 906:9 912:11 913:19 919:5 930:3 937:16 943:4,15 972:1 <b>report's</b> 776:8 <b>reported</b> 631:21 761:1 931:18 937:17 938:1,5 <b>reporter</b> 632:4 791:20,20 791:21 792:13 798:13 798:15 <b>reporting</b> 770:18 792:1 792:14 <b>reports</b> 774:15 778:5 917:8,20 952:3 <b>represent</b> 715:6 718:10 737:9 <b>representation</b> 876:5 908:14 939:1 <b>representative</b> 738:20 743:1 <b>representatives</b> 640:6,8 699:22 939:12 <b>represented</b> 656:11,17,21 657:3,7 718:11 867:15 867:15 875:21 877:3 890:6,7 896:18 <b>representing</b> 657:12 737:6 876:8,17 877:11 878:5,6 <b>reproach</b> 690:2	<b>Republic</b> 656:6 <b>republican</b> 656:7 690:18 783:11 868:2 890:19 928:12 963:15 969:21 970:4 <b>republican-</b> 691:2 <b>republicans</b> 817:16 864:8 882:19 899:22 947:16 969:4 974:12 975:17 977:7,9 978:17 979:15 979:15 980:11,14 <b>reputation</b> 955:13 <b>request</b> 654:1 707:11,13 863:7 866:8,12 <b>requested</b> 664:4 706:19 806:7 816:19 838:16 850:20 <b>require</b> 695:9,20 730:16 730:17 957:7 <b>required</b> 639:7,13 640:17 695:21 796:22 870:15 939:13 959:17 969:20 <b>requirement</b> 722:1 <b>requirements</b> 643:8,10 644:6 646:1,2 690:11 694:7 699:21 700:11 704:5 <b>requires</b> 640:7 <b>reread</b> 676:15 678:1 680:11 <b>research</b> 659:20 665:18 761:5 <b>researching</b> 657:14 <b>reservation</b> 890:14 <b>reserve</b> 689:19,20 <b>reservist</b> 791:12 <b>resident</b> 933:5 <b>resolution</b> 669:14 <b>resources</b> 702:11 704:22 878:19 <b>respect</b> 640:21 651:1 655:15 665:21 667:14 702:16 705:5 722:17 767:3,7 769:15 836:1,5 843:14 914:16 918:7 930:19 953:8 <b>respected</b> 800:5 <b>respective</b> 632:6 <b>respond</b> 689:1 <b>responded</b> 745:21 <b>respondent</b> 631:7 634:2 654:11 729:9 733:14,18 751:5,9 777:5 785:9 789:4 790:5,9 810:15 842:18 859:6 943:1 <b>respondent's</b> 635:6
--	--	--	--

682:14 683:4 731:12 766:9 771:11 906:2,6 914:14 943:4 <b>respondents</b> 805:12 981:16 <b>response</b> 743:15 749:10 <b>responsibilities</b> 803:2 <b>responsibility</b> 631:2 722:21 724:18 796:8 902:19 <b>responsible</b> 860:11 863:15 870:16 955:22 <b>rest</b> 755:11 867:18 <b>restrictions</b> 746:20 955:2 <b>restrictive</b> 675:9 <b>result</b> 651:20 722:17 759:22 815:2,5,14 853:16 879:8 924:6 <b>results</b> 657:1 664:12 722:16 735:20 761:2 763:9 782:18,19 783:19 823:16 <b>resume</b> 655:18 731:9 788:10 808:2 809:5 904:10 <b>resumed</b> 636:20 809:3 <b>resumes</b> 859:1 <b>RET</b> 634:3,4 <b>retainer</b> 737:8 <b>retired</b> 753:19 754:2 810:21 <b>retirement</b> 753:21 754:8 755:6 <b>returned</b> 850:21 959:15 <b>reversal</b> 678:9 680:6 <b>reverse</b> 678:4 <b>reversed</b> 674:3 677:16 729:12 730:19 926:5 <b>reversing</b> 678:7,21 <b>review</b> 649:17 650:14 675:22 676:19 677:13 678:2 687:16 688:1 689:8,13 693:5 706:8 773:13 926:4 939:20 <b>reviewed</b> 662:2 666:2 673:2 939:14 <b>reviewing</b> 661:13 <b>reviews</b> 928:1 <b>revise</b> 928:13 <b>revisit</b> 773:18 <b>ridiculed</b> 952:8 <b>ridiculous</b> 699:17 <b>right</b> 636:17 638:7 641:6 644:22 647:10 650:21 653:2 654:16,20 656:10 656:16 662:10 681:14	681:20 683:5 688:19 690:6 691:15,17 695:13 696:7,17,20 697:16,22 701:9 704:6 709:15 712:21 722:16 728:15 731:1,13 732:9,11,14 732:19 735:8 736:6,17 740:22 744:3,19 747:16 748:21 749:8,15 752:3 752:20 753:18 756:8 758:7 759:3 760:18 762:13 764:3 766:14 768:5,14 774:7 776:12 777:22 781:12,13 782:17 783:10 788:11 788:20 789:2 792:9 793:12 796:6 797:20 799:22 803:13 807:13 807:18 813:10 816:12 819:18 822:8 826:11 830:1 837:2,13 844:2,5 844:7,10 845:11 846:5 846:11 847:9 848:1,9 849:6 850:2,6 852:12 853:2,22 854:20 857:6 861:3 866:14 867:3,3 875:1 876:7 877:14 879:7,15 880:6 881:18 881:22 882:5 885:22 886:13,20 887:6 890:2 892:2 893:7,15 894:11 895:18 897:3 901:15,21 902:5 906:1 907:3,6 908:9 911:7,17 912:10 913:9 914:10 915:13 916:14 919:1 920:2 924:16 927:22 928:3,22 929:2 930:10,19 940:18 941:4 942:11 945:8 946:2 947:4 948:18 949:1,21 954:1,8 956:4 956:19 957:9 961:2,19 962:5 981:13 985:6,14 986:7 <b>rights</b> 645:20 653:16,20 683:12,13 860:8 <b>Riker's</b> 812:21 872:2,4,7 874:16 <b>ringing</b> 795:11 <b>rise</b> 679:16 <b>risk</b> 694:5,9 782:2 <b>risk-limiting</b> 782:6 785:13,21 <b>Ritter</b> 645:2 <b>rival</b> 676:6 <b>RNC</b> 793:16	<b>Robert</b> 633:3 776:4 855:15,16 <b>Robert's</b> 927:8 <b>Roberts</b> 730:8,11 <b>Rock</b> 875:7 <b>role</b> 739:6 762:14,16 770:18 821:13 824:5,6 898:18 <b>rolls</b> 870:17 953:1 <b>Roman</b> 737:2,4 887:11 <b>Ronald</b> 859:20 <b>room</b> 636:11 640:18 731:17,19 732:6,8 745:17 746:21 747:1,3 747:7,14,20,22 748:6,7 750:7 787:22 795:4 798:3 799:9 802:5 803:11 822:19,21,22 823:2,8 874:4 964:16 965:1 977:11,12 978:14 978:17 <b>rooms</b> 732:12 738:22 788:13 808:5 822:20 823:4 905:2 <b>Roslyn</b> 793:15 <b>roughly</b> 786:21 908:7 <b>rounds</b> 764:18 <b>row</b> 868:12 <b>Rudolph</b> 631:6,16 635:13 859:1 <b>Rudy</b> 875:7 <b>rule</b> 637:17 643:5,6,7,14 643:16,20,21 644:7,8 644:19,20 647:10,12,13 648:2,3,9,16,19 649:6 650:16 651:4,6,7,11,18 651:22 652:14 660:4,20 670:20 672:21,22 726:1 726:3,5 925:5 926:2,9 927:22 956:7,9 981:14 <b>rules</b> 647:11 659:22 661:19 672:17,21 691:22 708:5 756:1,5,5 957:7 981:18 <b>ruling</b> 637:18 642:5 646:11,21 723:21 853:14 <b>run</b> 650:20 659:22 699:3 886:9 965:12 <b>running</b> 736:21 748:6 795:1,12 796:1 821:4 <b>runs</b> 699:12 <b>rush</b> 764:1 <b>Russian</b> 876:10,13 <b>Ryan</b> 766:20 880:2 886:12 893:4	<b>S</b> <b>S</b> 636:1 809:1,1,1 <b>sacrificing</b> 885:1 <b>Saddam</b> 812:17 <b>safe</b> 649:11 <b>salary</b> 871:20 <b>same-day</b> 838:18 847:9 <b>Same-Sex</b> 926:20 <b>sampled</b> 782:12 <b>San</b> 791:9 <b>sanction</b> 660:4 661:14,18 726:1 <b>sanctioning</b> 648:16 660:20 <b>sanctions</b> 648:4,5,9,20 649:7 651:4,12,18,22 666:20 726:3,5 983:7 <b>sat</b> 644:4 <b>save</b> 853:14,15 929:15 <b>saved</b> 813:20 <b>saw</b> 651:22 769:11 770:5 792:14 797:15 844:12 913:13 914:22 953:13 953:13 964:19 <b>saying</b> 648:8 670:10 684:5 695:15 697:13 721:1 723:1,3,20 730:11 761:14 765:1 768:17 780:5 827:22 838:6 879:3 880:5 903:9,10 948:2 953:20 962:21 980:17 982:2,18 <b>says</b> 645:21 647:13 687:4 687:20 715:6 778:10 786:1 807:6 851:13 943:11 952:4 956:9 963:11 964:19 965:4 <b>Scalia</b> 684:7 730:9 <b>scanned</b> 935:10 <b>scarcity</b> 755:12 <b>Scaringi</b> 664:3,3 900:22 901:4,5 <b>schedule</b> 763:12 <b>scheduled</b> 663:17 664:5 <b>scheme</b> 802:8 <b>scholarly</b> 714:18 <b>school</b> 715:12 871:6 925:20 <b>schools</b> 871:17 <b>Schultz</b> 676:18 <b>science</b> 735:12 754:9,13 754:16,18,22 755:1,3 <b>Sciences</b> 754:5 <b>Scientific</b> 781:7 <b>scientist</b> 756:22 <b>Scott</b> 662:18 663:2,5,11
--	--	--	--

<p><b>screen</b> 766:9 906:7 910:10,10 913:13 929:21 940:2 962:14,14 968:18 <b>screwed</b> 919:16 945:6 <b>scroll</b> 830:3 <b>searching</b> 847:2 <b>seats</b> 823:1 <b>second</b> 638:5,6 642:3 643:1 658:13 659:12 665:18 667:2,11,14,17 668:18 669:2 673:3,8 682:16 686:9 706:19 708:12 720:20 767:14 772:13 775:11 776:17 819:9,10 825:12 832:19 832:19 835:21 843:22 845:6 866:13,13 898:19 899:2,3,15 900:10 910:3 921:1 923:5,10 925:4 929:11,12 930:21 931:6 944:4 945:10 958:1 986:6 <b>secondly</b> 647:21 <b>seconds</b> 678:18 <b>secrecy</b> 949:10 <b>secretary</b> 638:15 695:20 698:3 791:15 814:9 830:15 831:8,11,21 832:8 835:15,18 839:22 840:3,3 841:19,20 845:20 880:14 909:11 928:8 <b>section</b> 894:19 <b>sector</b> 734:6 <b>secure</b> 928:5 <b>security</b> 745:18 790:20 791:12,16 811:6,6,18 811:19,22 812:16 814:4 837:22 841:4,10,15 843:3 844:20,22 845:4 856:10 939:19 <b>see</b> 636:18 650:1 651:12 651:13 658:19 681:9 718:14 723:9 726:7,11 727:16 738:12,21 741:3 745:16 747:3 748:1,8 749:4 759:19 761:10,21 763:6 764:12,12 777:13 784:17 787:6 788:18 807:1 826:4,5,5,6 828:22 829:21 830:3 836:10 842:20 846:15 846:17,18 847:7 852:4 856:6,9 878:1 883:4,20 888:12 889:22 890:22</p>	<p>891:1,3,9,15,19,20,20 891:22 899:22 908:1 914:8 923:3 938:19 941:13 942:7,9 943:22 951:6,9,12,19,20 952:13 965:1,2,6 977:15 978:1 979:10 981:1 <b>seeing</b> 739:22 934:5 953:3 974:13 <b>seek</b> 687:16 689:8 <b>seeking</b> 642:13 645:19 648:8,9 689:21 <b>seen</b> 741:10 827:6,6 883:5 <b>segregated</b> 745:13 <b>Sekulow</b> 876:20 <b>select</b> 775:7 <b>selected</b> 756:21 782:12 886:10 973:13 <b>selecting</b> 871:5 <b>Senate</b> 656:8 817:9 859:20 860:14 861:16 <b>senators</b> 783:11 <b>send</b> 761:22 764:15,19 765:7 766:14,18 785:18 785:20 884:3,7,7 912:14 983:1 <b>sending</b> 824:15,16 838:9 838:9 <b>senior</b> 739:8 757:8 758:15 769:4 <b>sense</b> 785:12 902:21 911:6 953:15 <b>sent</b> 766:21 772:3 912:15 <b>sentence</b> 687:3,20 835:5 <b>sentenced</b> 816:2,7 <b>sentencing</b> 817:18 <b>separate</b> 868:18 938:7 <b>separated</b> 747:17,20 <b>separately</b> 763:6 <b>September</b> 812:20 820:1 820:8 870:2 875:15 <b>series</b> 738:15 748:3 <b>serious</b> 786:16 <b>servant</b> 814:19 <b>serve</b> 648:7 649:1 756:21 862:5 <b>served</b> 656:4 734:21 735:3 791:2,3 816:2 867:11 933:16 972:2 <b>serves</b> 741:9 <b>service</b> 813:16,17 814:5 859:9,10 860:6 <b>services</b> 793:4 <b>session</b> 981:15 983:12</p>	<p><b>set</b> 699:21 738:19 745:9 869:6 880:8 882:18 <b>setting</b> 720:4 <b>settle</b> 711:7 726:11 <b>settled</b> 670:6 702:19 703:22 704:2,3,10,12 704:13 721:2,2,3,5 <b>settling</b> 666:7,11 <b>seven</b> 640:3 690:22 691:3 870:1 922:10 957:22 <b>seventy-four</b> 940:22 <b>seventy-three</b> 940:15 <b>severed</b> 735:1 <b>Sheikh</b> 812:2 <b>sheriff</b> 887:15,15 890:11 890:13 970:13 <b>sheriff's</b> 738:18 743:2,9 745:21 746:4 <b>shoes</b> 923:16,22 <b>shooting</b> 684:8 <b>short</b> 665:15,17 726:12 754:5 777:1 946:11 <b>shorten</b> 813:5 <b>shorter</b> 659:20 <b>Shortly</b> 738:9 <b>shot</b> 813:21 <b>show</b> 723:1 791:22 825:21 826:7,11,12 849:17 856:12 872:15 875:9 920:14 946:4,5 955:16 956:20 977:2 <b>show-cause</b> 661:3 <b>showed</b> 743:18 893:1 912:15 945:20 951:5 959:3,5,12 960:22 961:14 <b>showing</b> 641:16,17 <b>shown</b> 754:16 840:22 911:10 935:19 <b>shows</b> 779:4,5 910:22 955:22 <b>shut</b> 792:22 832:2 <b>sic</b> 730:16 <b>Sicilian</b> 863:2 <b>sick</b> 898:15 <b>side</b> 648:11 743:7 745:12 747:15 860:2 <b>sides</b> 817:15 <b>Sierra</b> 754:20 <b>signature</b> 647:16 <b>signed</b> 834:8,17 899:7 <b>significant</b> 778:11 779:7 865:5 873:12 904:1 918:11 936:10 <b>sings</b> 647:17 <b>silent</b> 709:17,18,22</p>	<p><b>silicon</b> 754:4,4 <b>similar</b> 670:20 851:6 869:22 879:10 892:6 899:17 903:2 919:7,9 936:5 939:2 953:14 966:13 975:4 <b>similarity</b> 975:20 <b>Similarly</b> 934:8 961:19 <b>similarly-situated</b> 692:1 <b>simply</b> 972:22 <b>single</b> 786:11 936:17 961:6 962:4 974:18 <b>singled</b> 641:17 <b>singularly</b> 901:15 <b>sir</b> 637:21 638:12,18 639:2,10,17 640:1 641:4 642:9 643:17 644:2,21 653:21 654:5 654:17,21 655:3,6,9,12 655:14,19 656:2,9,14 656:15,20 657:2,6,10 657:16,22 659:18 660:2 660:6,8 661:16,20 662:4,15,21 663:13,18 664:1,7,13,18 666:4,8 666:13,17,22 667:12,21 668:3,8,22 669:19 670:12 673:10,10 674:9 674:17,21 676:20 677:4 677:14 681:19 682:1 684:15 686:10 690:5,13 698:13 699:6,10,14 700:2 701:9,13 706:3 706:21 707:6 708:11,20 709:2 711:17 712:13,18 725:16 728:6,8 730:16 794:6 800:22 814:10 815:21 816:11 817:20 825:7 847:12 848:18 922:5 943:8 944:2 950:7 962:20 973:9,15 974:4 978:15 <b>sit</b> 891:6 965:1 <b>site</b> 762:3 828:8 832:11 832:15 848:4 932:15 <b>sitting</b> 788:20 803:11,13 868:13 <b>situation</b> 651:8,10 703:12 713:3 793:17 794:5,11 794:20 823:8 961:20 <b>situations</b> 903:2 958:18 <b>six</b> 658:3 659:9 746:19 747:11 812:22 817:4 875:13 881:13 884:4 886:2 910:18 911:8 <b>six-year</b> 813:4</p>
---	--	---	---

<p><b>Sixth</b> 634:6 <b>Sixty-six</b> 931:5 <b>size</b> 755:18 <b>skills</b> 973:13 <b>skipped</b> 763:14 <b>slant</b> 769:3 <b>slightly</b> 751:21 752:11 <b>slit</b> 866:2,2 <b>sloppy</b> 636:18 <b>slow</b> 926:14,14 <b>slowly</b> 672:6 <b>Smith</b> 860:20 <b>so-called</b> 646:22 <b>Social</b> 837:22 841:4,9,15 843:3 844:20,22 845:4 856:9 <b>Societal</b> 756:20 <b>solely</b> 756:11 920:13 <b>solemnly</b> 733:4 750:17 789:18 810:7 <b>solicit</b> 759:5 <b>soliciting</b> 900:7 <b>solitary</b> 817:19,22 818:1 <b>somebody</b> 783:1 838:6 954:22 <b>somebody's</b> 841:15 949:9 <b>somewhat</b> 662:6 716:3 770:7 891:8 893:16 <b>son</b> 903:17 <b>sophisticated</b> 768:9 <b>sorry</b> 641:8,8 645:14 651:13 652:8 659:11 660:9,10,17 665:8 668:10 669:10 670:9,14 672:5,8 675:22 677:15 677:22 678:1,17,19 681:16 682:1 683:21 685:3 695:1 696:14,14 696:18 697:17 708:13 709:16 713:9,10 714:6 715:15 719:16 727:6,11 727:21 728:22 729:1 736:13 746:15 766:3,3 791:7 794:10 798:10 836:4 850:10 857:20 866:17 869:12 895:22 906:18 915:7,8 917:9 919:16 924:11 927:16 929:5 935:2,7 937:19 939:11 940:13 946:8 957:17 965:8 967:1 968:11 974:16 981:2,20 981:21 982:3 985:8 <b>sort</b> 646:19 725:8 736:14 763:22 823:5 824:20,22 830:19 848:8 873:4</p>	<p>966:2 974:8 <b>sought</b> 645:11 647:1 649:6 658:13 707:3 <b>sounded</b> 894:22 <b>sounds</b> 658:15 751:19 882:4 898:9 <b>source</b> 845:16 <b>sources</b> 828:5 846:17 847:4,17 902:9 905:9 905:11,12 <b>Southern</b> 861:13,17 862:3 863:21 <b>space</b> 891:7 <b>spaced</b> 891:8 <b>speak</b> 720:21 740:8,18 741:2,22 743:3 816:20 <b>speaking</b> 712:22 713:2 738:10 763:15 821:6 <b>special</b> 860:18 874:13 <b>specific</b> 640:19 674:11 690:8 704:17 711:4 717:22 729:15 748:14 753:10 762:9 768:5 802:17,18 843:6 856:16 905:17 906:11 931:9,10 932:16 936:1 937:6,6 950:3 960:12 966:19 970:19 <b>specifically</b> 678:13 679:1 684:10 700:14 708:8 737:12 753:13,13 761:9 761:16 783:15,17,21 784:22 799:8 801:13 802:10 863:7 870:5 923:8 945:14 <b>Specification</b> 805:14 <b>specificity</b> 972:5 <b>specifics</b> 941:13 <b>specify</b> 746:8 <b>spelled</b> 894:2 <b>spend</b> 657:14 743:12 759:17 777:20 874:20 <b>spoke</b> 740:20 759:4 888:14 896:20 <b>spoken</b> 746:3 <b>sponte</b> 648:15 651:2,18 652:4,14,21 660:20,20 <b>Springfield</b> 856:13 <b>square</b> 747:21 755:21 <b>staff</b> 634:21 738:10 794:14 813:2 884:19 <b>stage</b> 689:13 807:14 883:22 934:18 955:21 975:2 977:14,15 <b>stamp</b> 938:12 <b>Stan</b> 767:14</p>	<p><b>stand</b> 636:21 733:2 750:12 789:9 810:3 842:1 846:4 859:2 <b>standard</b> 644:9 646:19 661:7 670:11,15,19,20 712:1,3 713:13,16 957:4 <b>standards</b> 643:16,20,20 644:7,19 660:10,18 661:6,14 692:14 693:8 941:10,17 942:2 979:4 <b>standing</b> 638:22 639:7 653:11 674:12,15,20 675:2,8,10,16,20 676:3 676:5,14 677:2,11 678:13 679:1,9,13,16 679:19 680:4,19,22,22 681:2,4,13,15,18,22 682:1,2,6,7,11 683:11 683:17 684:2,14,18,21 684:21 685:5,8,14,15 685:20 686:18 722:5,8 722:12,15 723:1,2,6 884:13 922:17,18 923:1 923:2 924:4,20 925:7,8 927:3,4,8,14,19,20,21 928:7 929:1 <b>Starr</b> 898:4 <b>stars</b> 743:10 <b>start</b> 760:15 825:15 885:5 898:12 917:13 <b>started</b> 665:11 724:13 754:19 764:5 769:5 796:10 815:14 831:22 837:21 870:13,14 883:1 885:1 890:21 898:1,11 901:2 <b>starting</b> 876:6 877:14 889:3 899:14,16 916:19 <b>starts</b> 641:10 <b>state</b> 640:14 642:13 643:11 645:10 656:6,11 656:17,22 657:4,8 661:9 666:15 677:10 686:19 691:3 692:3,13 695:20 697:7 698:1,4,5 698:17,21 706:2,8,11 712:21 713:3 720:7 721:4 735:3 738:2 755:9,22 756:5 757:4 772:11 773:3,8,14 775:9 777:4 778:18 795:9 810:17 815:7,17 819:20 831:21 832:8 841:20 842:10 856:3,4 864:7 870:5 873:13</p>	<p>881:16 909:11 920:15 928:8,15 947:2 949:14 949:15 980:9,10 <b>state's</b> 712:6 830:15 831:8,11 835:16,19 839:22 840:4 845:20 <b>State-based</b> 755:5 <b>stated</b> 654:18 674:14 706:16 805:18 852:12 <b>statement</b> 665:9 668:14 681:10 708:15 710:6 725:9 798:13 805:20 929:4 982:12 <b>statements</b> 892:15 <b>states</b> 639:13 667:15 683:10,11 687:12 691:21 694:3 702:5 705:11 715:6 718:12 775:8 787:2 791:3 792:7 795:8 796:3 801:12 803:12 823:17 823:19 824:15 828:6,9 830:18 859:11 860:3,4 860:14 861:12,16 864:18 871:1,3 878:21 881:5,13 913:2 941:6 946:22 953:2 975:5 979:4 <b>statewide</b> 692:2 693:8 755:5 815:17 <b>stating</b> 686:12 980:16 <b>statistical</b> 759:13 760:11 769:15,19 771:14 773:22 778:17,20 779:7 <b>statistically</b> 764:14 776:4 908:20 946:5 <b>statisticians</b> 911:11 946:6 <b>statistics</b> 759:15,18 768:22 776:6,8 <b>statute</b> 695:22 697:5 698:2 706:11 853:3 <b>stay</b> 646:8,11 647:9 739:18 794:17 797:1 871:8 <b>staying</b> 794:22 795:1,5 795:15 <b>Ste</b> 633:16 <b>stenotype</b> 987:5 <b>step</b> 645:14 834:5,7,10,17 834:21 835:1 <b>Stepien</b> 740:4 <b>stepped</b> 796:16 797:4 922:21 <b>stepping</b> 797:9 <b>steps</b> 923:16,22 <b>stick</b> 780:5 876:16 900:1</p>
---	---	--	---

952:12 <b>sticking</b> 794:16 <b>Stinson</b> 680:14,21 681:4 681:6,13,15,17 683:10 683:16 <b>stint</b> 754:5 <b>Stolen</b> 784:3,7 <b>stood</b> 679:22 986:12 <b>stop</b> 831:18 979:13 <b>stopped</b> 909:18 <b>stories</b> 644:14 783:14 <b>story</b> 644:16 799:4 <b>strain</b> 721:13 <b>strange</b> 928:2 <b>Strategic</b> 734:8,9,15 <b>strategize</b> 717:2 <b>strategy</b> 716:17 796:13 824:5 <b>Stream</b> 986:9 <b>Street</b> 633:16 845:6 865:1,4 <b>strength</b> 708:21 709:11 <b>stress</b> 887:8 <b>strictly</b> 676:4 <b>strike</b> 969:17 <b>strong</b> 781:15 <b>strongly</b> 711:3 <b>struck</b> 975:20 <b>studies</b> 651:16 <b>study</b> 652:10,15 <b>stuff</b> 754:20 780:4 828:19 841:6 847:6 852:9 855:8 880:21 881:20 <b>Stuttgart</b> 791:4,13 792:5 <b>sua</b> 648:14 651:2,18 652:4,14,21 660:19,20 <b>subject</b> 700:6 705:14 756:12 865:16,17 866:1 <b>subjective</b> 661:4 688:16 688:20 <b>subjects</b> 878:9 <b>submission</b> 648:11 651:13 <b>submit</b> 937:5 983:15 <b>submits</b> 647:14 <b>submitted</b> 647:20 <b>subscribe</b> 873:4 <b>subscribers</b> 758:2,10 760:3 <b>subsequent</b> 697:7 698:4 779:12 <b>subsequently</b> 949:2 <b>Substact</b> 756:17 775:22 <b>substance</b> 770:10,16,19 770:21 778:19 <b>substantial</b> 724:18 924:3	<b>substantially</b> 705:19 706:1 <b>substituted</b> 662:19 664:20 665:1 <b>subtitle</b> 819:13 <b>success</b> 718:1 <b>successful</b> 703:16 865:14 875:12 <b>successor</b> 872:18 <b>sudden</b> 946:1 <b>sued</b> 922:10 <b>suffers</b> 643:2 <b>sufficiency</b> 939:15 <b>sufficient</b> 642:7 675:8 846:1 924:4 <b>suggest</b> 684:17 685:14 718:17 <b>suggested</b> 724:17 777:20 806:7 926:4 <b>suggesting</b> 641:20 <b>suing</b> 897:13 <b>suit</b> 653:11 <b>suited</b> 694:10 <b>sum</b> 778:19 <b>summarily</b> 739:17 <b>summarize</b> 972:9 <b>summarized</b> 778:10 <b>summarizes</b> 925:15 <b>summary</b> 765:13 766:2 778:6 <b>summation</b> 805:13 806:12 807:16,21 <b>summations</b> 805:8 <b>super</b> 811:19 <b>superficial</b> 782:6 <b>supervisor</b> 935:13 938:9 938:12 <b>supplemental</b> 705:12 706:7 777:17 <b>supplying</b> 902:13 <b>support</b> 680:4 686:5 688:5 717:18 932:8 937:14 942:16 956:8 957:21 958:8 969:14 970:22 <b>supported</b> 670:3 693:1 715:4 942:14 958:3 <b>supporter</b> 820:1,19 821:7 <b>supportive</b> 821:5 <b>supports</b> 938:3 <b>suppose</b> 638:14 952:15 982:14 <b>supposed</b> 636:8 893:9 908:4 956:10 976:3 979:11,12,13,14 984:2 <b>supreme</b> 640:16 646:9,10	646:14 647:4 649:17 687:12,16 693:7 695:19 696:1 697:6,9 698:3 710:21 711:1 716:6 717:11,22 718:12,13 720:1,9,13,18 721:7 729:12 730:19 925:10 925:15 926:11,22 928:20 941:15 964:11 975:9,11 977:10 <b>sure</b> 638:15 640:3 654:14 660:17 662:9 672:6 682:18 703:5,21 714:10 714:11 715:13 716:18 718:21 725:19 728:2 747:19 751:16 770:12 771:6 780:8,9 781:5 783:15,16 785:19 790:13 791:2 792:12 793:6 794:15 805:16 806:1,12 807:5 838:11 843:13 845:8,10 851:16 851:18 856:2 873:15 886:17 895:16 913:17 915:18,19 922:13 929:18 945:15 948:10 962:18,18 968:22 972:16,17 974:22 <b>surely</b> 922:22 924:22 <b>surfaced</b> 951:3 <b>surplus</b> 868:12,14 <b>surprise</b> 844:12,15,17,19 855:15,18,19 <b>surprised</b> 729:18 899:4 <b>surprising</b> 712:12 <b>surrendered</b> 815:20 <b>surrounded</b> 890:19 <b>surrounding</b> 725:8 <b>survey</b> 652:5 <b>surveys</b> 754:16 <b>suspect</b> 778:15,21 <b>suspend</b> 908:5,6 <b>suspended</b> 631:8 908:2,3 908:7 <b>suspending</b> 978:11 <b>suspicious</b> 947:13 <b>sustain</b> 773:10 <b>sustained</b> 837:11 842:7,8 846:9 850:4 857:5 <b>swear</b> 733:4 750:17 789:18 810:8 827:14 829:4,8 <b>switch</b> 637:7 <b>switching</b> 789:1 <b>sworn</b> 733:15 751:6 790:6	<b>Syracuse</b> 753:7 <b>system</b> 633:11 646:3 812:22 817:2,6 835:3 871:5,6 <hr/> <b>T</b> <hr/> <b>T</b> 809:1 <b>T-o-e-n-s-i-n-g</b> 894:2 <b>table</b> 640:10 803:11 823:2 <b>take</b> 644:10 652:17 688:14 698:4 711:2 712:4 714:20 731:8 746:5 767:4 779:14 788:3,4,8,16 848:12 874:7 878:12 904:7,11 904:21 909:12 951:16 986:9 <b>takeaway</b> 778:4 <b>taken</b> 632:1 647:17 720:6 732:13 788:14 808:7 873:5 886:14 893:14 897:8 904:2 905:3 919:8 987:3,4,10 <b>takes</b> 947:5 949:4,12 <b>talk</b> 639:11 777:7 782:22 786:21 806:2,11 851:15 854:11 878:3 896:5 962:6 <b>talked</b> 722:5 884:17,18 889:2,7,7 896:5,16 936:7 953:6 958:14,14 962:3,22 963:3 965:10 967:10 970:20 975:14 <b>talking</b> 649:21 688:18,19 701:5 728:4 739:2 755:19 759:12 760:14 770:21 782:21 783:16 783:17,21 798:14 801:6 801:10 843:5 879:15 894:15 896:21 919:12 923:5 960:7 962:19 976:7 980:12 <b>talks</b> 963:10 <b>tangentially</b> 879:11 <b>tape</b> 938:4 968:2 <b>tapping</b> 755:15 <b>task</b> 813:8 824:21 860:20 869:13 870:8,10 <b>taught</b> 973:10 <b>tax</b> 860:9 <b>teachers</b> 871:11,13,20 <b>team</b> 736:22 737:6 759:7 759:20 761:3,4,15 762:13,18 763:4 764:9 774:14 821:17 823:6
--	--	---	--

824:20 827:21 837:16 845:15 847:22 876:18 876:19,21 884:9 891:17 892:4,21 893:10,19,19 894:9,10,12 900:13 901:15 903:17 <b>teams</b> 799:1 878:21 <b>Teamsters</b> 864:13,14 <b>technical</b> 645:22 646:7 714:22 754:7 828:7 <b>technically</b> 676:10 796:14 797:2 862:2 876:19 <b>technology</b> 769:2 <b>telephone</b> 745:18 746:7 <b>television</b> 791:22,22 <b>tell</b> 643:4 645:5 647:12 742:16 744:19 759:3 761:12,20 762:12 764:3 767:20 776:22 777:6 785:16 790:11 795:14 830:1 832:11 838:2 850:15 855:6 859:12,16 889:18 896:17 915:16 943:11 979:22 982:6 <b>telling</b> 765:21 899:18,19 899:21 <b>Temporarily</b> 631:8 <b>ten</b> 735:7 749:3 816:6 872:17 <b>tend</b> 954:7 <b>tenure</b> 861:19 867:21 871:7 <b>term</b> 669:21 681:2 779:12 912:17 946:19 946:21 954:22 <b>terminated</b> 851:5,6 <b>terms</b> 823:9 <b>terrible</b> 892:7 <b>territory</b> 702:12 <b>terror</b> 819:19,21 820:2 <b>Terrorism</b> 820:14 869:13 <b>terrorist</b> 865:7 869:9 <b>terrorists</b> 865:10 <b>test</b> 661:4 712:4 718:14 729:21,21 730:12 924:4 927:14 929:5 <b>testified</b> 724:6 733:16 751:7 790:7 840:16 888:20 894:5 898:17 912:5 950:16 958:2 961:17 962:16 969:2 975:19 <b>testifies</b> 777:17 842:13 <b>testify</b> 771:7 772:1,15 773:4,5,7,12 817:7,9,13	825:19 837:8 892:14,15 928:11 931:12 <b>testifying</b> 770:13 848:15 848:16 850:12 <b>testimony</b> 665:3 710:16 710:18 714:17 715:4 722:6 724:20 733:4 750:18 777:10 788:4 789:18 800:21 805:2,7 810:8 836:2,6 882:3 904:13 920:3 935:18 943:14 944:3 946:8,14 956:2 958:15 965:15 <b>Texas</b> 652:10 767:17 <b>thank</b> 641:10 654:6,9 705:9 724:1 725:10 726:13 728:15,20 729:6 731:1,5 732:2,9,21 733:11 735:16 750:2,4 750:9 751:2 752:18 763:14 767:5 787:6,13 788:11 790:2 802:19 804:1,3,5,8,17 808:2,3 853:9 858:1,6,8,18 866:21 868:13 870:1 873:9 875:20 891:1 895:8 904:20,22 920:17 920:21 935:6 942:11,17 978:3 981:6,7,8 <b>thanks</b> 752:18 <b>that'd</b> 770:2 <b>theories</b> 685:16 686:4 <b>theory</b> 674:20 675:20 679:20 682:7 684:20,20 685:22 702:9 719:19,21 723:16 800:6 922:9 927:2 928:18 940:13 <b>they'd</b> 770:4 <b>thing</b> 723:20 757:21 760:20 762:17,17 770:3 776:2 779:10 782:14 786:14 807:4 815:15 820:15 834:4 835:20 838:2 843:2 871:14 889:21 892:20 915:2 917:7 920:1 928:4 930:1 946:7 957:11 965:20 968:5 977:5 984:1 <b>things</b> 642:10 643:7 645:12 647:2,18 649:13 665:3 691:9 703:9 704:7 716:12 725:1,18 725:22 726:7,11 753:12 753:17 754:20 755:9 756:6,14,19 757:10,15	762:7 764:13,22 768:3 769:2,7 770:5 783:3 796:18 800:18 807:2 811:8 812:9 814:6 818:2 832:6 834:10 835:13 838:1,10 868:22 884:21 888:21 890:21 903:7 916:21 919:15 946:5 955:10,11 957:3 972:13,13 973:11 <b>think</b> 637:14 647:6 649:12 650:1 655:17 710:3,3,15 713:19 715:3 717:9 719:17 722:6 729:15 731:22 749:14 754:14 770:11 770:14,17 773:10,21 780:17,17 788:5 796:8 800:7 807:15,21 813:9 813:21 815:16,19 816:15 818:8 820:2,4 821:15,22 822:7 824:12 826:9,9 827:8 832:10 832:10 833:9,13 834:12 834:22 841:1,7 846:1 846:19 849:7,19 855:7 862:13 868:9 871:15 873:8,12 876:7 877:21 878:10 879:2 882:5 883:15 885:8,21 886:7 886:8,10 887:4,6,13,13 888:20 897:3,6,6,8 898:6 904:6,8 911:7 915:4,4,20 916:3 923:1 927:16,16 929:3,12,20 937:13 940:9 942:13 943:16,19,20 944:3,7 945:17 946:16 951:7 955:22 956:11,13,16 957:4,10,22 958:6 961:5 968:4 972:12,16 972:19 973:12 983:20 <b>thinking</b> 670:3 756:19 801:16 898:11,13 985:18 <b>thinks</b> 882:4 <b>third</b> 637:8,16,17 638:1 638:11 639:15,21 640:22 643:14 644:18 646:3 649:16 650:13 661:17 680:10,14,17 681:8 683:15 684:1 685:3 687:6 689:11,11 700:20 701:5,6,11 767:15,15 775:15 843:2 844:3 859:18 868:1	886:16,16 899:16 927:13 <b>thirty-four</b> 937:22 <b>thirty-one</b> 934:21 <b>thirty-three</b> 936:6 <b>Thompson</b> 861:1 <b>Thor</b> 894:17 <b>thought</b> 688:21 700:14 720:12 723:13 727:11 746:14 751:17 770:4 772:21 779:18 796:15 817:5 828:21 829:1 858:17 868:4 874:6 880:22 899:6 907:17 915:7 928:6 962:21 981:21 <b>thousand</b> 879:4 883:15 883:17 907:15,16 934:4 966:8 <b>thousands</b> 862:12 <b>threat</b> 866:2 <b>threatened</b> 744:6 745:22 866:4 940:1,4 942:9 <b>threats</b> 820:9 <b>three</b> 639:6 647:18,22 655:16 718:11 743:10 743:13 769:7 774:15 775:1,3 816:3 826:3 834:12 836:1,6 865:18 865:19 869:11 886:17 902:22 910:17 950:15 952:10 957:10 <b>threshold</b> 719:13 721:18 <b>threw</b> 977:5 <b>throat</b> 866:2 <b>throughput</b> 748:4 <b>thrown</b> 916:20 977:12,16 980:10,11,15,18 <b>thrust</b> 930:13 <b>Thursday</b> 986:12 <b>tie</b> 842:12 <b>till</b> 788:9 984:21 <b>time</b> 637:15 650:13,18 651:3 652:19 657:19 661:1,1 665:17 667:9 689:2 701:18,21 713:4 718:3,7 725:13 726:2 726:12,17 736:4 740:3 747:13 754:2 756:4 759:17 760:7,10 763:17 765:5 771:7 777:20 797:13 798:14 801:2 806:8 814:8,13,15 818:4 819:3 820:20,22 821:9 822:5 825:18 826:14 829:6 831:17
---	---	---	--

835:8 841:5,12 842:4,8 843:2 846:10 850:5 851:2 853:15 858:19 859:16 860:5 861:11 864:16 866:22 867:18 868:19 870:17 871:11 874:20 876:14 877:4 884:3 887:3 890:2 892:2 901:22 902:5 904:6,9,9 908:6,7,10,12 909:6 910:22 912:21 915:21 929:8,15 946:11 949:14 957:15 964:1 967:18 972:12 976:2,17 977:4 983:18 984:3 985:5,17 <b>timeline</b> 658:19 <b>times</b> 764:19 779:12 832:6 834:13 865:14 879:3 885:16 891:11 934:4 935:10 939:5 952:10 956:1 964:1 965:13 972:15 973:17 <b>timing</b> 944:12 985:11 <b>title</b> 843:7 847:7 873:20 925:18 <b>titles</b> 734:3 <b>today</b> 720:19 805:2,7 820:9 904:13 913:13 943:19 944:22 973:20 <b>Toensing</b> 799:3 833:20 893:22 894:1,2 <b>told</b> 678:11,20 679:11 737:7 743:10,20 746:4 753:4 761:15 763:16 769:14 841:18 878:20 879:9 885:5,16 888:18 888:18 889:19,22 891:11 893:5 896:8 919:15,15 938:7 955:14 959:13 977:7 <b>Tom</b> 874:1 <b>tomorrow</b> 805:8 982:6 984:20 986:2 <b>tonight</b> 983:1 <b>Tony</b> 767:13 <b>tool</b> 851:22 <b>top</b> 641:6,9 683:5 737:15 894:16 907:22 910:20 <b>topic</b> 759:11 <b>topics</b> 758:3 817:18 <b>total</b> 652:18 774:15 911:2 911:3 <b>totally</b> 911:3,6,12 953:2 <b>touch</b> 793:3 <b>tour</b> 791:8	<b>tower</b> 874:5 <b>Townley</b> 677:5,9 678:15 679:3,14 <b>tracking</b> 910:19 <b>Trade</b> 869:10 <b>traditional</b> 948:6 <b>traditionally</b> 870:20 872:8 947:15 <b>trained</b> 870:3 <b>Trainer</b> 740:6 <b>transcript</b> 666:3 <b>translate</b> 765:1 <b>transmute</b> 642:15 <b>transpired</b> 749:14 <b>transpiring</b> 736:3 738:12 738:22 745:11,16 746:21 747:4 <b>Travel</b> 926:17 <b>traveled</b> 738:3 <b>treason</b> 876:15 <b>treated</b> 642:19,20 903:20 <b>treating</b> 641:20 <b>treatment</b> 641:18 690:19 691:6 712:20 <b>tremendous</b> 862:6 <b>trial</b> 784:2 972:3,20,20 <b>trials</b> 867:17 <b>tributes</b> 849:10 <b>Tributes.com</b> 847:3 849:3 <b>tried</b> 717:22 779:10 795:10 828:2 972:13 973:15 <b>Trinidad-Tobago</b> 812:4 <b>trip</b> 897:16 <b>TRO</b> 688:6 <b>true</b> 659:15 660:3 661:17 662:5 663:14,19 664:2 664:8,14 668:17 669:1 678:7 681:12 683:15 686:7 687:9 689:3 698:17 702:7 706:6 707:7 708:7 827:15,16 847:13 932:8 937:9,11 948:22 949:3 950:20 951:4 952:9 953:22 957:12,15,19 977:3 987:7 <b>Trump</b> 641:17 642:20 654:3 717:19 735:22 737:6,8 738:21 740:14 741:4,16 762:10 784:7 790:14,22 791:14,18 792:10 816:5 817:12 820:17,19 821:10 822:13 834:9,15 876:1	876:8 879:9 882:14 888:8,8 907:14,14 908:17 911:2,4,6 924:7 933:17 939:22 940:3 945:21 946:8,10 948:13 954:4,8 <b>Trump's</b> 734:22 738:16 <b>Trump/Pence</b> 739:9 <b>trusted</b> 973:13 <b>truth</b> 733:6,6,6 750:19,19 750:20 771:18 773:1 789:20,20,20 810:9,10 810:10 920:7,16,19 <b>try</b> 645:8 714:12 717:17 717:18 719:1 764:22 863:21 866:9 889:3 891:18,21 903:3 957:15 <b>trying</b> 657:9 754:21 755:1,3 758:20 769:20 770:9 774:4 795:2 797:16 832:1 854:19 902:20,20,21 932:19 956:17,20 963:5 <b>Tuesday</b> 747:5 <b>turn</b> 642:13 647:10 648:18 745:19,22 770:6 919:9 <b>turned</b> 743:22 744:7 749:6 809:18 916:17 <b>turnover</b> 665:20 870:16 <b>turns</b> 671:11,17 <b>twenty-one-day</b> 648:22 649:20,22 660:21 <b>twice</b> 783:2 801:16 <b>two</b> 647:21 648:5 662:18 676:22 686:4 690:8 697:9 707:21 719:19 729:4,13,14,22 753:7 758:1,21 763:19,22 764:4 765:14,17 768:13 779:2 792:18,18 815:9 815:11 833:22 834:12 834:14 844:16 847:2 863:5 865:19,20 867:15 884:8 886:7,10,11 893:21 905:21 922:9,11 926:11 940:9,11 943:6 944:15 955:8 957:10 958:13 960:16 977:16 983:13 <b>two-</b> 652:11 <b>two-and-a-half</b> 652:11 <b>two-year</b> 814:21 815:7 <b>Twombly</b> 644:5 <b>type</b> 701:21 703:12 763:11 811:5,9 849:5	<b>types</b> 718:18 909:3 <b>typewriting</b> 987:6 <b>typical</b> 657:20 725:14 <b>typographical</b> 953:7,10
<b>U</b>			
			<b>U.S</b> 656:7 814:1 816:18 818:22,22 860:12,13 861:20 862:3 863:18,20 863:22 866:5 867:2 869:13,14,19,20 870:21 936:8 <b>U.S.C</b> 705:15 <b>Uh-oh</b> 752:13 <b>Ukraine</b> 877:12 <b>ultimate</b> 708:9 716:5 <b>ultimately</b> 721:16,16 726:1 <b>Um-um</b> 946:3 <b>unable</b> 871:12,15 931:13 <b>unaware</b> 685:22 702:4 703:16 <b>unceremoniously</b> 909:18 <b>unchartered</b> 703:2 <b>unclear</b> 665:4 707:12 725:2 881:6 <b>uncommon</b> 918:3 <b>unconstitutionally</b> 687:5 <b>undergraduate</b> 735:14 <b>understaffed</b> 824:20 <b>understand</b> 660:12 672:7 779:5 782:4 797:6,8 843:14 945:19 962:11 982:17 <b>understandable</b> 765:2,2 <b>understanding</b> 795:22 796:11 797:14 820:6 853:7 <b>understood</b> 661:12 799:16 943:14 <b>undertaking</b> 712:8 <b>unduly</b> 669:13 <b>unemployment</b> 868:8 870:22 871:2 <b>unequal</b> 690:19 <b>unequivocally</b> 776:10 <b>unfamiliar</b> 730:3 <b>uniform</b> 744:6 <b>uniformity</b> 713:6 718:8 <b>uniformly</b> 931:13 942:7 969:7 974:13 <b>unintentional</b> 781:10 <b>union</b> 864:13,14 871:10 871:11,13 936:9 <b>unique</b> 721:5 951:15,15 <b>Unit</b> 868:18

<p><b>United</b> 687:12 705:11 718:12 775:8 787:1 791:2 792:7 859:11 860:3,4,14 861:12,16 864:18 871:1,3 941:6 953:1 <b>Unites</b> 715:5 <b>universal</b> 925:5,5 <b>universally</b> 941:11 <b>universe</b> 751:18 916:11 <b>University</b> 735:12,14 753:7 <b>unknowingly</b> 659:22 <b>unlawful</b> 686:8 <b>unmute</b> 682:22 <b>unprecedented</b> 701:16 721:6,11 <b>unquote</b> 713:14 <b>unreasonable</b> 717:8 <b>unrelated</b> 878:11 <b>unsettled</b> 690:1 <b>unsuccessful</b> 703:19 <b>unsure</b> 667:12 <b>untrue</b> 927:17 929:6 942:12 953:21 <b>unusual</b> 729:3 764:13 769:21 861:22 872:4 <b>unusually</b> 665:17 862:17 <b>unwarranted</b> 685:1 <b>updated</b> 677:20 <b>upset</b> 794:18 <b>upstate</b> 755:15 <b>use</b> 818:1 931:8 954:17 <b>useful</b> 891:18 984:21 <b>USPS</b> 936:13 <b>usual</b> 797:4 <b>usually</b> 702:11 863:18 <b>Utica</b> 754:1 <b>utilized</b> 690:17 942:3</p> <hr/> <p style="text-align: center;"><b>V</b></p> <hr/> <p><b>v</b> 680:14 683:10,16 693:6 693:14 699:5 717:15 730:6 883:10 <b>vacant</b> 937:3 <b>vacated</b> 646:17 <b>vacation</b> 937:3 <b>vacator</b> 647:1 <b>vague</b> 713:16 <b>valence</b> 667:13 <b>valid</b> 643:8 670:22 671:5 671:12 672:1,9 684:20 703:20 763:9 941:2 <b>Valley</b> 754:4 <b>Valor</b> 813:19 <b>vantage</b> 745:15</p>	<p><b>varied</b> 652:11 917:21 <b>variety</b> 756:10 757:1 <b>various</b> 641:13 654:2 811:6 817:14,14 824:15 837:19 845:14 849:9 902:9 905:8 930:13 <b>Vegas</b> 864:16 <b>vehicle</b> 736:5 <b>verdict</b> 712:3 <b>verification</b> 933:7,15 <b>verify</b> 647:16 728:3 827:20 840:21 <b>Veritas</b> 937:17 938:2,3,6 938:15 967:9,20 <b>vernacular</b> 919:17 <b>versa</b> 854:6 912:13 <b>version</b> 911:13 <b>versions</b> 720:17 779:13 893:6 <b>versus</b> 831:4 <b>vice</b> 659:17 664:16 854:6 864:19 912:13 <b>Vicky</b> 799:3 893:22 894:1 900:13,16 901:8 <b>Victoria</b> 833:20 <b>view</b> 673:8 675:9 688:16 702:19 705:2 715:10 719:21 721:9 780:3 805:1 940:7 957:1 <b>viewed</b> 946:6 <b>views</b> 717:2 817:22 820:7 <b>violate</b> 786:17 <b>violated</b> 640:4 653:15,19 672:17,22 690:20 708:5 942:2 <b>violates</b> 648:2 <b>violation</b> 652:1 690:9 698:10 701:15 706:11 881:14 928:14,15 981:17 <b>violations</b> 639:1 683:12 805:9 815:12 960:9 <b>violence</b> 872:12 874:16 942:8 <b>violent</b> 860:21,22 872:3,9 872:11,15 <b>Virginia</b> 656:8 791:6 793:14 822:9 879:20 <b>virtual</b> 631:15 632:1 <b>virtually</b> 974:13 <b>visible</b> 727:19 <b>voice</b> 796:17 <b>voiced</b> 927:18 <b>voir</b> 635:12 839:1,10,12 843:11,12 847:19,20 853:10,21 857:3</p>	<p><b>Vol</b> 631:9 <b>volume</b> 752:12,13 <b>volunteered</b> 793:4 892:12 <b>volunteering</b> 760:10 <b>volunteers</b> 890:20 <b>Von</b> 874:1 <b>voracity</b> 842:1 846:5 <b>vote</b> 641:2,16 654:4 713:13 783:2 787:3 853:3,7 865:17 908:14 912:21 930:14 931:22 933:7,11,14 940:19 941:2 947:16 952:17 958:20 959:1,2,12,17 959:22 960:1,2,22 961:14 966:1 976:1 977:1 979:10 <b>voted</b> 830:17 836:22 865:19,20 909:10 913:1 916:2 917:18 918:3 952:10 954:4,4,9,10 959:7,13 961:15 <b>voter</b> 642:18 686:6,8 694:5 713:15 735:1 844:13,18 854:17,20 867:8 912:16 930:11,12 930:12 940:15 952:21 953:1 <b>voters</b> 690:20 692:2 720:6 832:5 840:5 847:2 850:17 856:17 916:6 931:20,21 951:15 951:15 954:7 <b>votes</b> 642:20,21 645:22 687:5 778:14,21 783:1 787:1 850:19 907:19 911:4,15 940:16,21 941:1 947:6,10 958:17 958:18 965:12 969:6 970:5,9,10 <b>voting</b> 645:20 683:13 838:18 847:9,10 854:20 909:8 918:21 930:14 935:9,12 945:16 947:18 948:14 953:15 954:20 955:12 958:21 961:12 977:3,4,6 <b>vouch</b> 836:9 <b>vs</b> 638:15 645:2 680:21 681:4,13,14,17 691:12 692:22 693:20 699:2 710:20 711:3,4 713:12 717:21 718:2,5 729:19 730:7,11 876:1 926:21</p> <hr/> <p style="text-align: center;"><b>W</b></p> <hr/>	<p><b>wacky</b> 911:3 <b>wait</b> 650:3 726:10 743:1 906:5 <b>waited</b> 743:6 933:12 952:16 <b>waiting</b> 636:10 731:16,19 732:6,8 750:6 787:22 <b>walked</b> 742:20 744:7 745:7 <b>Wall</b> 865:1,4 <b>Walton</b> 908:16 <b>want</b> 637:7,15,16 645:1 647:10 652:20 653:2 658:17 672:6 678:5 682:19,21 684:4 698:22 715:6 716:15 718:13 721:7 727:20 728:2 732:15 761:9,17 762:11 771:8 777:14 782:4 792:19 793:20 801:11 804:14 806:19 807:7,15 807:15 823:1 825:18 839:5 850:11 853:13 854:11 858:15,19 862:8 884:20 905:10 914:7 930:5,8 932:17 941:18 942:14 952:13 966:17 968:5 970:21 980:1 982:15 984:1 985:12 <b>wanted</b> 661:21 663:20 674:10 689:17 729:2 735:8 765:17,19 768:15 792:16 818:7 821:19 862:5 916:9 921:16 959:12 971:11 973:21 974:2 980:6 <b>war</b> 735:13 819:19,21 820:2 <b>warden</b> 813:7 <b>warehouse</b> 935:12 <b>warrant</b> 684:4 <b>warranted</b> 651:14,15 719:2,6 <b>Washington</b> 633:17 730:7 736:1 738:4 741:8 791:14 816:20 817:3 821:19 822:6 879:2 886:19 895:10 <b>wasn't</b> 668:11 684:16 685:12 688:8,9,17 700:5 705:7 712:12 717:14 723:5 741:14 746:12,12 754:13 776:4 796:21 797:2 798:6 799:5,6 802:14 835:16 854:8 884:12,22 891:12</p>
--	--	---	--

891:12 899:10 908:4 945:17 948:15 952:7 955:20 962:17 964:6 970:3 976:10 <b>waste</b> 667:9 817:1 <b>watcher</b> 745:5 <b>watchers</b> 639:14 640:5,7 640:8,18 933:22 939:12 939:18 940:3 978:17 980:7 <b>watching</b> 883:10 <b>water</b> 755:10,11,13,16,16 756:1,6 976:22 977:1 <b>water-related</b> 755:8 <b>wave</b> 946:17 <b>way</b> 643:12 705:7 710:21 717:10,22 730:12 736:2 738:16 770:6 816:14 838:8 872:20 876:12 883:2,6,6 885:18 887:5 897:17 898:13,21 918:10 919:17 924:8 934:3 941:1 943:16 944:1 948:10 951:7 955:17 971:22 <b>ways</b> 648:5 700:11 711:20,21 769:7 930:14 932:21 <b>we'll</b> 636:11 764:2 788:9 807:1 808:1,1 826:7 904:20 929:20 966:11 982:15 985:13,14,15 986:2 <b>we're</b> 744:1,2 761:7 770:21 772:10 782:21 788:22,22 801:10 805:1 809:5 825:10 837:7,9,9 838:6 853:16 856:4 876:16 879:15 889:6 934:17,19 954:2 980:11 982:5 984:2 <b>we've</b> 771:3 781:19 875:22 889:5 895:8 942:15 948:9 <b>website</b> 764:7 774:13 830:15,22 832:2,3 848:6,13 849:5,6,8,8 <b>Wednesday</b> 631:13 736:12 738:4 <b>week</b> 756:20 759:2 792:18 796:9 894:6 <b>weekly</b> 775:12,18 <b>weeks</b> 657:14 758:1 916:1 <b>weigh</b> 644:13 <b>weight</b> 712:5,6 777:9	<b>welcome</b> 732:22 978:4 <b>welfare</b> 868:18,19,20 870:12,13,15,17 <b>went</b> 646:2 685:8 736:20 738:13,17,19 739:4,15 739:19 749:11 760:2 765:6 791:7,9 792:4 817:3 821:21 822:1,5,6 822:13,13,15 831:3,3 832:11,15,21 833:8 837:18 841:3 866:3 867:5 868:8 872:14 878:1 880:18 885:14,22 887:2,4,6,20 888:4,11 890:3 892:5 907:16 908:15 955:9 957:9,10 960:2 961:12 978:13 <b>weren't</b> 696:11 779:17 794:15 797:19 824:4 833:10,10 882:21 883:4 891:1 900:6 908:4 919:19 932:19 951:1 952:6 964:3,8 977:14 977:21 <b>Western</b> 652:9 <b>White</b> 741:11 819:2 824:16 834:12 <b>whiteboard</b> 795:7 <b>widely</b> 742:19 <b>widespread</b> 971:1 <b>wife</b> 814:20 880:1 894:1 <b>Wikipedia</b> 848:8 <b>William</b> 767:17 843:22 844:16,16 860:19 925:14,20 <b>Williams</b> 844:3 <b>willing</b> 759:17,21 793:10 947:15 <b>wind</b> 717:10 <b>window</b> 659:20 <b>Winfrey</b> 875:8 <b>winner</b> 654:3 <b>winning</b> 940:17 <b>Wisconsin</b> 823:18 895:7 899:20 908:8 974:16 <b>wish</b> 839:9 <b>Wished</b> 656:5 <b>withdraw</b> 662:17 663:6,9 814:15 815:2 826:19 954:11 <b>withdrawal</b> 815:6,6 <b>withdrawn</b> 648:10 669:10 698:7 <b>withdrew</b> 954:13 967:5 <b>withholding</b> 638:3 <b>witness</b> 634:18 636:9,12	636:21 660:15,18 710:19 711:12,17,19 712:13,15,18 713:1,11 714:1,6 715:1,13,16 716:9 717:12,20 718:21 719:22 721:12 722:10 722:19 724:11 725:5,16 729:4 731:7 732:15 733:1,8,14 750:4,5,12 750:15,21 751:5 752:12 770:20 777:7,21 785:5 787:15,16 788:10,16 789:4,9,10,14,22 790:5 802:9 803:4,8,18 804:5 804:8,9,10,12,20 807:6 809:13,21 810:3,6,11 830:8 837:8 839:21 846:1 848:22 852:17 853:6 854:14 858:8,9 858:11,15 859:1 904:8 904:13 906:3 914:12,22 915:7,16 924:18 929:22 935:7 938:17 954:12 968:9 969:12 972:11 973:3,9 974:4,7 976:12 976:16 978:4,15,19 979:1,8,22 980:3,8,17 980:21 981:2,7,12 986:4 <b>witnessed</b> 817:5 <b>witnesses</b> 635:3,7 636:8 804:19 928:11 931:11 932:3 965:19 966:3 976:6,8 978:1 979:2 <b>woman</b> 737:7,13,19 758:14 760:21 833:21 <b>won</b> 702:8 784:8 865:18 867:10 907:18 <b>wonderful</b> 719:12 <b>word</b> 641:14 779:15 780:2 824:12 930:4 <b>words</b> 763:3 776:5 870:21 977:10 <b>work</b> 734:5 755:4 762:14 763:3 764:9 773:16 774:8,11 790:13 795:2 795:11 811:10 861:5 870:13,15 896:11 897:4 898:16 916:11 944:13 982:22 <b>worked</b> 657:19 717:17 753:22 756:2 763:9 791:6,14 811:16 812:3 812:4,5 820:3,5 821:1,9 845:14 873:1 875:17 880:15 898:14 900:9,11	901:6,8 911:21 <b>worker</b> 931:18 <b>workers</b> 931:11 939:22 <b>Workfare</b> 870:14 <b>working</b> 657:18 729:4 748:7 758:19 790:22 795:6 798:3,6 799:1,7 801:15 802:10,15,15 803:12,14 828:15 829:2 833:18 834:10,13 870:13 880:9 894:8,9 896:10,13 900:17,18,19 <b>world</b> 805:1 869:10 <b>worse</b> 642:20 <b>worst</b> 872:3 <b>worth</b> 885:1 <b>wouldn't</b> 677:20 685:12 693:1 699:3 702:21 706:13 717:14 729:18 777:20 844:11,15 887:15 927:14 952:18 954:6 962:4 <b>wrap</b> 805:1 985:14 <b>Wright</b> 662:12 <b>write</b> 756:15 761:5,6,6 763:18 764:14 769:13 776:15 885:7,7 <b>write-ups</b> 764:20 <b>writing</b> 665:11 746:15 779:18 885:5 897:17 968:12 <b>written</b> 756:9,13,15 767:22 774:19 775:21 779:16 938:16 <b>wrong</b> 689:18 697:19 722:8,18 723:3 887:5 955:15 968:11,14 <b>wrongdoing</b> 925:1 <b>wrongly</b> 687:21 <b>wrote</b> 765:12,13 771:22 776:16,16 778:5,6 779:11 782:5 860:21,21 885:6 900:14 944:18 973:22 981:4 <hr/> <b>X</b> <hr/> <b>X</b> 631:4,12 635:1 685:20 <b>XI.11</b> 981:14 <hr/> <b>Y</b> <hr/> <b>Y</b> 685:20 <b>yards</b> 891:14 <b>yeah</b> 636:15 660:12 679:21 682:2,18 695:11 711:12 714:9,10 719:15 725:3 726:20 727:18
---	--	---	--

731:22 769:6 795:18 798:15,22 807:4 811:13 811:13 816:15 818:5 822:10 823:11 826:4,9 827:17 829:13 830:8,10 831:15,19,19 833:3 837:18 839:5 840:19,19 840:19,19 846:18 875:5 879:21 883:22 884:16 888:2 892:5 897:2,6,9 898:3 900:19,22 902:11 905:16 906:13 907:8 910:1,3,12,15 912:9 916:16 921:21 924:17 931:1 938:21 946:12 948:10 949:13 951:6 952:4 957:8,18 964:14 967:22 968:9,22 969:1 <b>year</b> 652:11 677:17 678:4 775:6,14 814:11 860:15 867:6 869:8 872:14 875:10 876:7 <b>years</b> 719:19 720:3 729:13,14,22 735:5,7 756:8 757:7 758:21 791:11 811:17 812:22 813:9 815:9 816:3,6 820:4,14 834:14 836:22 859:12 865:22 867:10 867:12,22 868:2,12,12 869:11,14 870:1 871:2 872:17 873:11 875:13 891:6 911:22 916:3 921:11,19 926:16 931:14 933:5 951:15,16 952:16 <b>yesterday</b> 637:4 645:3 646:10,16 647:6 699:5 724:7 922:8 929:12 944:3 972:8 <b>York</b> 634:7,7 754:1 755:4 755:9,15,22 767:18 810:21 812:18,21 813:8 861:13,17 862:4,16,18 864:7 867:1,11 868:11 869:15,22 870:20 871:6 872:5 873:2 874:21 879:3 <b>young</b> 767:14 869:1 885:8 <b>YouTube</b> 751:20	<b>0.04</b> 911:8 <b>00</b> 656:14 <hr/> <b>1</b> <b>1,111</b> 916:4,10 <b>1.1M</b> 870:12 <b>1.2</b> 653:1 <b>1:30</b> 804:16 808:2 809:2 <b>10</b> 641:7,8,8 774:14,15 779:6 792:19 813:21 899:11 911:11 <b>10-</b> 899:8 <b>10%</b> 724:21 <b>10,000</b> 758:2,9 917:21 <b>10.5</b> 868:8 <b>10:00</b> 933:13,18 <b>10:22</b> 714:4 <b>10:55</b> 732:10 <b>100</b> 691:18 916:19 966:12 <b>100%</b> 737:18 <b>100,000</b> 747:21 <b>10036</b> 634:7 <b>100s</b> 734:16 <b>101</b> 691:19 <b>1040</b> 785:18 <b>11</b> 647:11,12,13 648:3,9 648:16,19 649:6 650:16 651:4,6,7,11,18 652:1 652:14 660:5,21 670:21 726:1,3,5 766:9 771:11 816:3 820:4 870:2 875:16 906:6 943:5 984:3 <b>11:00</b> 731:9 979:17 985:20 986:2,12 <b>112</b> 836:22 916:2 951:15 951:16 <b>114</b> 652:17 <b>116</b> 652:17 <b>11th</b> 812:20 820:1,8 <b>12</b> 642:2 658:7 659:3,10 766:17 923:3,18 925:10 <b>12,000</b> 863:17 <b>12:00</b> 788:9 979:17 <b>12:14</b> 808:6 <b>120,000</b> 919:22 <b>128</b> 931:7 960:17 <b>129</b> 931:17 960:17 <b>12th</b> 662:16 793:20 902:1 <b>13</b> 687:18 688:4 813:22 <b>131</b> 935:2,7 965:9 <b>132</b> 864:17 936:5 <b>132-3</b> 966:18 <b>133</b> 936:9 966:18 <b>134</b> 937:20,21 967:8	<b>1367</b> 705:16 <b>14</b> 686:22 709:4 727:22 727:22 818:8 <b>141</b> 727:4 <b>147</b> 968:6,15,17 <b>15</b> 658:14 659:14 743:6 788:6 801:2,9 899:12 904:11 935:16 <b>150</b> 907:14 908:18 <b>15th</b> 659:2,2 662:22 801:3 827:7 <b>16</b> 637:11 <b>160M</b> 787:1 <b>16th</b> 663:4 664:2 766:22 767:2 827:7 902:1 <b>17</b> 687:18 <b>17,000</b> 959:4 <b>172</b> 940:13,13 <b>175</b> 801:14 941:3 <b>17th</b> 663:17 664:6,15 666:6 772:13 801:3 898:22 902:1 905:7 <b>18</b> 640:9 659:11 682:14 682:14 683:4 727:19,21 <b>180</b> 860:15 <b>1854</b> 951:18 952:3,6 <b>18th</b> 659:13 816:7,8,8 <b>19</b> 687:1 867:2 <b>19-</b> 820:21 <b>19%</b> 911:2 <b>1931</b> 862:16 <b>1954</b> 952:18 <b>1980</b> 730:7 <b>1981</b> 859:15 <b>1983</b> 651:5,21 <b>1984</b> 859:15 <b>1989</b> 867:3,6 <b>1992</b> 820:21 <b>1993</b> 651:6,8,10,21 <b>1994</b> 820:21 861:3 <b>1999</b> 872:14 <b>19th</b> 650:12 <b>1M</b> 755:20 <b>1st</b> 650:6	<b>2004</b> 814:12,22 <b>2007</b> 815:16 <b>2009</b> 815:19 <b>2010</b> 816:8 <b>2013</b> 816:16,17 <b>2015</b> 734:21 819:5 <b>2016</b> 734:21 877:7 <b>2017</b> 925:20 <b>2019</b> 876:8 <b>202</b> 633:18 <b>2020</b> 690:8 735:17 739:9 757:18 759:1 778:14 784:8 792:11,15 816:7 816:9 820:17 821:10 850:22 877:9 933:17 938:6 947:18 948:2,8 949:3 <b>2020-D253</b> 631:8 <b>2021</b> 782:3 <b>2022</b> 631:13 948:3 986:13 <b>2024</b> 790:14,22 792:11 987:21 <b>20M</b> 787:3,3 <b>20th</b> 933:6 <b>21</b> 648:9 650:3,3,18,19 660:22 694:1 726:3 923:8,18 924:14 <b>212</b> 634:8 <b>214,410</b> 850:18 851:12 919:12 <b>21st</b> 650:13 <b>22</b> 682:14 683:4 883:9 <b>22-BD-027</b> 631:6 <b>22,000</b> 863:15 <b>224</b> 932:15 962:10,14 <b>23</b> 923:21 924:11,12 <b>235</b> 691:18,21 <b>237255</b> 631:11 <b>23rd</b> 664:12 <b>24</b> 924:11,11 <b>24/7</b> 873:1 <b>240</b> 919:21 <b>249</b> 966:12 <b>25</b> 727:20 907:4,5 909:14 <b>27</b> 910:2,6,11 <b>28</b> 705:15 933:5 <b>2M</b> 947:20 <b>2nd</b> 659:5	<hr/> <b>3</b> <b>3</b> 631:9 <b>3.1</b> 672:21 <b>3:30</b> 904:21 <b>30</b> 652:13 823:1 891:14 891:14 899:12
--	---	--	--	---

<p><b>300</b> 862:22 966:11 <b>300,000</b> 778:14,21 <b>31</b> 987:21 <b>33,290</b> 911:5 <b>34</b> 726:21 753:19 <b>34th</b> 678:3 <b>35</b> 652:13 868:12 <b>37</b> 687:1 <b>38</b> 930:5 <b>39</b> 825:11 <b>3rd</b> 658:8,14 659:6,8 677:22 735:17,21 757:18 877:15 933:19</p> <hr/> <p style="text-align: center;"><b>4</b></p> <p><b>4</b> 933:7 <b>4:00</b> 933:13 <b>4:54</b> 986:11 <b>40</b> 825:11,15,16,20 826:8 826:8 847:16 913:15 914:14 920:4 949:20,21 950:1 <b>400</b> 862:22 <b>41</b> 825:15,20 826:11 843:15 847:16 913:15 916:22 <b>415</b> 845:6 <b>42</b> 825:15,20 826:12 913:15 918:5,8 <b>43</b> 825:15,20 826:7,12 829:19 835:22 913:15 919:2 920:4 949:20 <b>45</b> 968:13 <b>45,000</b> 782:12 <b>46</b> 968:13,14 <b>48</b> 816:2 <b>484</b> 925:20 <b>486-0011</b> 634:8 <b>4th</b> 736:15 739:3,5,10,11 739:13 740:8,19,21,21 741:5 742:4 821:16,22 879:16,16 887:1 933:19</p> <hr/> <p style="text-align: center;"><b>5</b></p> <p><b>5</b> 938:6 <b>5:00</b> 984:2 <b>50</b> 775:8 828:4 921:19 964:1 <b>500</b> 775:18 <b>500,000</b> 870:12 <b>51</b> 784:4 <b>515</b> 633:16 <b>546</b> 634:6 <b>57</b> 937:19 <b>578,000</b> 911:4 <b>59</b> 930:6</p>	<p><b>5M</b> 947:19,20 <b>5th</b> 739:3,5,11 740:21 742:4,6,11 744:9 889:10</p> <hr/> <p style="text-align: center;"><b>6</b></p> <p><b>60</b> 864:6 872:3,13 <b>63</b> 782:12 <b>637</b> 635:4 <b>638-1501</b> 633:18 <b>65%</b> 868:3 <b>650</b> 907:14 908:18 <b>650,000</b> 907:18,21 <b>654</b> 635:4 <b>66</b> 960:16 <b>67</b> 779:4,6 935:2 965:9 <b>68</b> 937:19 <b>6th</b> 744:17</p> <hr/> <p style="text-align: center;"><b>7</b></p> <p><b>7</b> 631:13 <b>7:00</b> 933:19 <b>70</b> 868:4 <b>700,000</b> 907:19,19 <b>708,727</b> 635:4 <b>72</b> 663:12 939:9 968:6,12 968:13,15 <b>729</b> 635:4 <b>733</b> 635:8 <b>751</b> 635:9 <b>781</b> 635:9 <b>785</b> 635:9 <b>790</b> 635:10 <b>7th</b> 833:9,13</p> <hr/> <p style="text-align: center;"><b>8</b></p> <p><b>8</b> 643:5,6,16,20 644:8,19 956:7,9 986:13 <b>80</b> 844:17 <b>800</b> 863:2 <b>810</b> 635:11 <b>82</b> 940:12,12 <b>839</b> 635:12 <b>842</b> 635:11,12 <b>847</b> 635:12 <b>850</b> 635:11 <b>853</b> 635:12 <b>859</b> 635:13 <b>86</b> 954:12 <b>87%</b> 786:14,18,19,21 787:5 <b>890</b> 678:3 <b>8th</b> 649:11</p> <hr/> <p style="text-align: center;"><b>9</b></p> <p><b>9</b> 643:21 644:20 691:18</p>	<p>960:15 <b>9/11</b> 814:6 868:13 870:1 874:3 <b>9:02</b> 632:2 <b>90%</b> 870:12 872:13 874:15 <b>91</b> 962:8 <b>92</b> 860:3,4 <b>943</b> 635:13 <b>97</b> 932:10,11 962:10 <b>99.06</b> 911:8 <b>9th</b> 650:2 658:20 662:11</p>
---	--	---