

# COPY

**DAVID KRIKORIAN**

Cincinnati, OH 45243-2206

May 25, 2012

Office of General Counsel  
Federal Election Commission  
999 E Street, NW  
Washington, D.C. 20463

OFFICE OF GENERAL COUNSEL

2012 JUN -6 PM 2:10

FEDERAL ELECTION COMMISSION

RE: Supplemental Information in respect to MUR 6494

I am writing to provide you with additional information regarding your ongoing investigation into Rep. Jean Schmidt, MUR 6494.

On April 30, 2012 Rep Schmidt filed a quarterly report with the House Ethics Committee regarding the activities of her legal expense fund.<sup>1</sup> The report showed that Rep. Schmidt has raised \$5000 toward the nearly half a million dollars of illegal payments made on her behalf.<sup>2</sup> As demonstrated in my original complaint, it is irrefutable that the payments made by the Turkish Coalition of America constitute campaign contributions.

There are a few specific issues to which I would like to direct your attention.

## I. AOR 2011-20

Since the filing of my complaint and the initiation of MUR 6494, Rep. Schmidt has submitted and withdrawn a letter requesting permission to use campaign funds to refund portions of the payments at issue in MUR 6494 ("AOR 2011-20"). While the Commission has been less than candid regarding the conditions under which AOR 2011-20 was withdrawn from the FEC website, it seems clear that it was removed, at least in part, due to a determination that Mr. Greenberg, one of the subjects of the complaint underlying MUR 6494, was less than completely forthright with the Commission in the AOR 2011-20 letter.<sup>3</sup> Specifically, failing to inform the Commission that the legal fees Greenberg claimed to be seeking to pay had in fact already been paid by the Turkish Coalition of America ("TCA").

<sup>1</sup> Jean Schmidt, Letter to House Ethics Committee dated April 29, 2012 (Signed by Rep. Schmidt April 30, 2012). A copy of which is attached hereto as Exhibit A.

<sup>2</sup> *Id.* and Cincinnati Enquirer, "Schmidt reports one donation for her legal expense fund" Available online at <http://cincinnati.com/blogs/politics/2012/05/01/schmidt-reports-one-donation-for-her-legal-expense-fund/>. A copy of which is attached hereto as Exhibit B.

<sup>3</sup> AOR 2011-20 was removed from the FEC website on the afternoon of October 26, 2011 yet Rep. Schmidt's attorney did not inform the FEC that she was withdrawing the request until November 10, 2011. Thus it seems that the AOR was removed from the website for some reason other than Rep. Schmidt's withdraw two weeks later.

As noted in my public comment submitted to and received by the Commission prior to the removal of AOR 2011-20 from the FEC website, AOR 2011-20 is little more than an admission by Schmidt for Congress to the charges underlying MUR 6494. That is, that the legal expenses which TCA paid, were campaign related. As such, the payments constitute campaign contributions under the analysis of Advisory Opinion 2006-22 wherein payments to attorneys for campaign related legal services were found to constitute campaign contributions.

## II. IRS Determination

Included in my original complaint letter initiating MUR 6494 were copies of complaints filed with the IRS regarding the non-reporting of the payments at issue in this investigation. For, it is axiomatic that such payments, if they are not campaign contributions the payments would necessarily have been income to Rep. Schmidt. Recently, I received a letter from the IRS which I took to mean that the IRS that will not be pursuing an action for non-reporting of income and/or non-payment of taxes on said income.<sup>4</sup> While the FEC may not be bound by the determinations of the IRS, it would seem that Rep. Schmidt must be bound by such determinations.

In order for the Commission to come to a complete understanding of Rep. Schmidt's position regarding the status of these payments, the Commission must review the communications between Rep. Schmidt and the IRS. It would seem that Rep. Schmidt must necessarily have argued against a finding of income by pointing to the campaign related nature of the payments – thus arguing for and accepting the position that the payments by TCA were in fact campaign contributions. Therefore, I respectfully suggest to the Commission that as part of this investigation the Commission reviews copies of all communications between Rep. Schmidt and her agents and the Internal Revenue Service regarding this payment scheme.

## III. Rep. Schmidt's own admissions that the Attorneys were retained by Schmidt for Congress

In reviewing the deposition testimony of Rep. Schmidt from August 24, 2009 I discovered testimony by Rep. Schmidt in which she unambiguously states that the attorney for whom TCA paid were retained by Schmidt for Congress, not Rep. Schmidt personally.

Q. Have you retained Mr. Brey and Mr. Fein personally, or is it the campaign that has retained them?

A. The campaign has retained them.

Q. They work for the campaign?

A. Yes.<sup>5</sup>

<sup>4</sup> Letter from IRS Whistleblower Office to David Krikorian April 27, 2012. Attached as Exhibit C.

<sup>5</sup> Schmidt deposition at p. 113, lines 14-19. Emphasis added. The entirety of Rep. Schmidt's deposition testimony is attached as Exhibit D.

Thus, by her own words, Rep. Schmidt has indisputably corroborated the basic contention of my complaint: that the Turkish Coalition of America, a tax-exempt 501(c)(3) corporation, illegally paid campaign expenses of Schmidt for Congress; that those contributions were excessive; and that Schmidt for Congress violated Federal law by accepting the contributions and failing to report the contributions.

#### **IV. Conversion of Campaign Resources to Personal Use**

In light of the Rep. Schmidt's sworn testimony that the attorneys were retained by Schmidt for Congress, if Rep. Schmidt argues that the legal expenses paid by TCA were not campaign related, then she has de jure admitted that she converted campaign resources to personal use in violation of Federal Law. The legal services provided by Messrs. Fein, Brey, Saltzman, et al. are undeniably campaign resources as the attorneys were retained by the campaign.

Moreover, with respect to the civil litigation, when Rep. Schmidt initially filed suit against me claiming defamation, she sought \$8.6 Million dollars in compensatory and punitive damages. She brought the case in her name alone. Thus, had she prevailed, she would have personally benefitted to the tune of \$8.6 Million from the legal services of attorneys retained by Schmidt for Congress. The law is clear, campaign resources are not to be used in the furtherance of personal financial gain. By utilizing attorneys retained by her campaign committee in an attempt at personal gain, Rep. Schmidt converted campaign resources for personal use.

The Ethics Committee, in providing an opportunity for Rep. Schmidt to utilize a legal expense fund to refund the illegal payments, attempted essentially to recreate the circumstances of AO 1997-27, wherein then Congressman, now Speaker, Boehner sought to use campaign funds in furtherance of a potential lawsuit regarding the interception of a telephone conversation. While in many ways the use of campaign funds to pay legal expenses and the use of a legal expense fund are analogous, there are very real and important differences between the situation addressed in AO 1997-27 and the immediate investigation into Rep. Schmidt. Specifically, Rep. Boehner sought out permission prior to initiating litigation, Rep. Schmidt did not; Rep. Boehner provided full disclosure of the facts surrounding his proposed use of campaign funds for litigation related expenses while Rep. Schmidt still has not given a complete account of her understanding and intentions of the payment scheme of her legal expenses; and perhaps most importantly, at no time did Rep. Boehner stand to benefit personally from the litigation, whereas Rep. Schmidt initiated the litigation for the purpose of personal gain to the tune of some \$8.6 Million.

It was not until after the Ethics Committee was alerted to the illegal payment scheme that Rep. Schmidt was forced to acknowledge the illegal payment and in exchange for being allowed to use the proceeds of a legal expense fund to refund the illegal payments Rep. Schmidt agreed not to personally benefit from the outcome of the litigation. It is important to note that the lawsuit, in which Jean Schmidt personally was the only Plaintiff, was filed in June of 2010. It was not until August 16, 2011 that Rep. Schmidt entered into an agreement whereby she would not personally benefit from the outcome of the litigation. This agreement essentially mirrors the agreement of AO 1997-27.

Hence, while it is certainly true that Rep. Schmidt ultimately did agree not to seek personal gain from the lawsuit, she did in fact initiate the lawsuit for the purpose of personal gain, and continued on that purpose for over a year before establishing a legal expense fund. Further, just eight months after agreeing not to seek personal gain from the lawsuit, Rep. Schmidt dismissed the case. Thus, for the first 15 of the 23 months that the lawsuit was active, Rep. Schmidt sought personal gain.

Further, when asked to identify special damages suffered by Rep. Schmidt to justify such an enormous award, Rep. Schmidt pointed to costs incurred by Schmidt for Congress in the 2008 election. One Interrogatory question and Rep. Schmidt's answer thereto provides ample evidence that Rep. Schmidt converted to personal use the resources of the campaign:

[i]dentify the basis and evidence relied upon for [Ms. Schmidt] to allege in her Complaint that each defamatory statement damaged [Ms. Schmidt] \$500,000 that were separate and distinct from the other alleged defamatory statements.<sup>6</sup>

And Rep. Schmidt's response thereto:

At the time the Complaint was drafted [Ms. Schmidt] knew her support dropped 3% from the time Krikorian disseminated his defamatory statements against her the weekend before the 2008 general election. Ultimately, her victory margin was 45% to 37% for Victoria Wulsin and 17% for David Krikorian. Jean Schmidt spent approximately \$1,276,579 for the 2007-2008 election cycle. 3/11ths of this amount (representing the reduction from an 11% margin to an 8% margin) is \$348,156. In addition, the amount Jean Schmidt's campaign committee was able to raise in the 2009-2010 election cycle was \$241,926 less than the amount it raised in the 2007-2008 cycle. Thus, it is reasonable to conclude that the comparable defamatory statements by Mr. Krikorian caused economic damages well in excess of \$500,000. (\$348,156 plus \$241,926 totals \$590,082). Moreover, in defamation actions, compensatory damages are not limited to economic damages, but also include impairment of reputation, personal humiliation, shame, mental anguish, and suffering.<sup>7</sup>

Ignoring the sheer odiousness of the implication that Rep. Schmidt essentially bought the margin of victory in her election, this statement by Rep. Schmidt clearly indicates that the damages alleged in her complaint belonged rightly to the campaign, not to Rep. Schmidt personally, but Rep. Schmidt personally was the sole Plaintiff in the matter. Thus, Rep. Schmidt sought to recover personally for alleged damages of the campaign committee. There can be no more obvious example of converting campaign resources than attempting to recover personally for the money damages allegedly suffered by the campaign!

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<sup>6</sup> Interrogatory 11.

<sup>7</sup> Schmidt responses to Request for Admissions, Interrogatories and Request for Production of Documents, Interrogatory 11.

As established above and in my initial complaint, Rep. Schmidt and her agents have acknowledged numerous times that the legal expenses were "directly related" to her campaign and that the campaign retained the attorneys. As such, it is indisputable that the legal services provided by the attorneys were resources of the campaign. By seeking \$8.6 Million in damages on her own behalf, not on behalf of the campaign – money that Rep. Schmidt intended to deposit into her personal accounts – Rep. Schmidt converted campaign resources (i.e. legal services) to personal use (i.e. the seeking of a civil judgment). Further, by seeking to recover personally for alleged damages of the campaign, Rep. Schmidt committed a second, separate act of conversion to personal use resources of the campaign.

#### V. MUR 5141

If, in spite of the overwhelming evidence including Rep. Schmidt's own statements admitting, even trumpeting, that the legal expenses were campaign related, the Commission finds that the legal expense were not campaign related, but were rather personal expenses, I would further direct you to MUR 5141. In that instance the Commission enunciated several factors used in determining the status of third party payments for personal expenses:

Whether receipt of funds for living expenses would free-up other funds of the candidate for campaign purposes; whether the candidate would have more time to spend on the campaign instead of pursuing his or her usual employment, and whether the funds would not have been donated but for the candidacy.<sup>8</sup>

Under the analysis of MUR 5141, it is equally clear that the payments by TCA to the attorneys retained by Schmidt for Congress, even assuming the expenses were personal, are clearly campaign contributions.

In the years prior to the litigation, Rep. Schmidt had loaned approximately \$275,000 (interest free) to her campaign. Until December 30, 2011, Schmidt for Congress had never made any payment to Rep. Schmidt on those loans. It was not until she was forced by the Ethics Committee to refund approximately \$40,000 of the illegal payments using personal funds that Schmidt for Congress began repayment on any of those loans. Tellingly, Schmidt for Congress paid \$20,000 to Rep. Schmidt on December 30, 2011 and \$30,000 on January 21, 2012. On January 30, 2012 Rep. Schmidt informed the Ethics Committee that she personally refunded \$42,812.82 of the illegal payments made on her behalf. It is my understanding that this amount was for the amicus brief filings at issue in the aborted AOR 2011-20. Thus, Rep. Schmidt provides irrefutable proof that the payment of the litigation expenses by the third party, TCA, did in fact free up other funds for the campaign.

Since the August 2011 Ethics Committee Report, Schmidt for Congress has repaid approximately \$90,000 of the debt to Rep. Schmidt, and is for all intents and purposes insolvent. In the most recent quarterly filing Schmidt for Congress reported debts of approximately

<sup>8</sup> MUR 5141, Statement of Reasons, p. 4. Citing Advisory Opinions 1982-64; 1978-40; 1976-70; and response to Advisory Opinion Request 1976-84.

\$180,000 (the outstanding indebtedness to Rep. Schmidt herself) and cash on hand of approximately \$4000.

There is nothing is better than the facts on the ground to prove an assertion. And I think the facts clearly prove the assertion that the receipt of funds for legal expenses freed up other funds of the candidate for campaign purposes – specifically the \$275,000 that was payable to Rep. Schmidt on demand from the campaign.

As to the second factor, whether the candidate would have more time to spend in pursuit of personal income rather than campaign funds, Rep. Schmidt is a salaried member of the House of Representatives; as such this factor is not particularly relevant. But it is also obvious that had Rep. Schmidt paid for the legal services herself as the bills became due, her personal resources (including her time) would necessarily have been taxed away from her normal campaign duties. Additionally, the fact that once payment was required of Rep. Schmidt personally she made almost immediate demand of the campaign for partial repayment of the loans demonstrates that the campaign benefitted greatly from the illegal payment scheme.

Finally, there can be no disputing that the payments made on Rep. Schmidt's behalf would not have been made but for her candidacy. The principals behind the payments knew Rep. Schmidt only through her position, in fact having initially met at a political fundraiser.

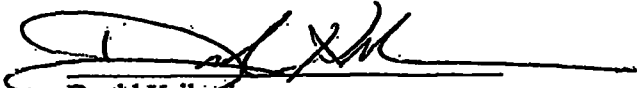
## VI. Conclusion

The FEC now has before it numerous representations by Rep. Schmidt wherein she acknowledges that the legal expenses paid by TCA were “directly related” to her campaign, that “the campaign has retained” the attorneys in question, that the attorneys in question “work for the campaign.” Further these statements were made knowingly either under oath or subject to the False Statements Act. As such, Rep. Schmidt has boxed herself into a corner from which she cannot escape. It is incontrovertible that, as stated in my original complaint, Schmidt for Congress has received nearly half a million dollars in illegal campaign contributions which have not been reported as such. The violations of Federal law in this case are myriad. The Commission must now act to correct these violations.

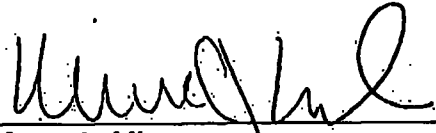
Recent news reports suggest that Rep. Schmidt intends to walk away from this “debt” once she leaves office and sheds herself of the oversight of the Ethics Committee.<sup>9</sup> If this is true, absent enforcement of Federal laws and regulations by the FEC, Rep. Schmidt will have successfully thumbed her nose at House Ethics Rules and Federal election laws. Thus, the FEC alone has the power to bring justice in this matter.

<sup>9</sup> Cincinnati Enquirer, “Schmidt reports one donation for her legal expense fund,” *Supra*; and National Journal, “Schmidt Snubs Ethics Panel Order to Pay Off Legal Debts” Available online at <http://nationaljournal.com/congress/schmidt-snubs-ethics-panel-order-to-pay-off-legal-debts-20120502>. A copy of which is attached hereto as Exhibit E.

David Krikorian hereby verifies that the statements made in the attached supplement to the Complaint underlying MUR 6494 are, upon information and belief, true. Sworn pursuant to 18 U.S.C. § 1001.

  
David Krikorian

Sworn to and subscribed before me this 30<sup>th</sup> day of May, 2012.

  
Notary Public



Miranda Jo Curl  
Notary Public, State of Ohio  
My Commission Expires 05-18-2016

1002101012001

## Schmidt reports one donation for her legal expense fund

05/01/12 at 4:33pm • Written by Deirdre Shesgreen • 1 Comments • Recommend

✪ Raise Your Voice

Rep. Jean Schmidt, R-Miami Township, raised only \$5,000 in the first three months of 2012 for her legal expense trust, according to her latest disclosure report.



Schmidt set up the trust last year, after the House Ethics Committee ordered her to repay about \$500,000 in improper legal fees she had unknowingly received from the Turkish Coalition of America. Schmidt has since said her outstanding legal tab is actually closer to \$430,000—about \$70,000 less than the ethics committee estimated.

The single donation she raised in the 1st quarter of 2012 came from Global Eclipse, a Delaware limited liability company, on Jan. 26. That was before Schmidt lost the Republican primary to Brad Wenstrup, a Cincinnati doctor who will now face William R. Smith in the November election.

Schmidt reported making no expenditures last quarter, except a \$29 payment to the U.S. Postal Service for a P.O. Box.

In her previous legal expense fundraising reports, Schmidt reported raising no money except \$10 that she contributed herself. But at the time of her last filing on Jan. 31, her spokesman Barrett Brunsman touted the incoming \$5,000—the one donation reflected in the 2012 1<sup>st</sup> quarter filing—and said “additional significant contributions” were expected.

Since Schmidt lost her primary contest, she will be out of office come January 2013. Ethics experts have said that she is free to ignore the ethics committee ruling once she leaves the U.S. House.

Brunsmann has not directly answered questions about whether Schmidt intends to fulfill the House ethics order once she's out of office, even if she can't raise enough money before then. He has said the legal expense trust shows that she “has always intended to pay her legal bills.”

In any case, since Schmidt is now a lame-duck, it's harder for her to scoop up coveted donations—for either her regular campaign account or her legal expense trust.

Her latest Federal Election Commission report, also covering the first three months of 2012, shows that she raised less than \$50,000 for her House campaign account, and much of that money flowed into her coffers before her March 6 defeat. Her campaign spent about \$189,000 in the first three months of 2012, including a \$40,000 loan repayment Schmidt made to herself on March 30. (She had loaned her campaign more than \$250,000 during her 2005-2006 election.)

EXHIBIT

B

EXHIBIT



Schmidt ended the 1<sup>st</sup> quarter with less than \$4,000 cash on hand and about \$184,000 in outstanding debts.

Posted in: 2nd Congressional District, Congress, Election 2012, Republicans

Tags: Brad Wenstrup, Jean Schmidt, William R. Smith

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Comment



Peter B. Steele · Top Commenter · Cincinnati, Ohio

Are you asking if our Jean has any intention to comply to comply with a request to correct her unethical actions by returning the monies that she shouldn't have received in the first place? What world are you living in? Her ten dollar contribution will be all you'll ever see out of her pocket. Nixon may have said that he wasn't a crook, but our Jean has never said that she wasn't.

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**IN THE OHIO ELECTIONS COMMISSION  
CASE NOS. 2009E-003 AND 2009E-012**

**JEAN SCHMIDT**

**COMPLAINANT**

**VS.**

**DAVID KRIKORIAN**

**RESPONDENT**

**DEPONENT: JEAN SCHMIDT**

**DATE: AUGUST 24, 2009**

**REPORTER: ANNEMARIE GRANT**



<p>1</p> <p>2</p> <p>3</p> <p>4</p> <p>5 ON BEHALF OF THE COMPLAINANT:</p> <p>6 DONALD C. BREY</p> <p>7 CHESTER, WILLCOX &amp; SAMBS LLP</p> <p>8 65 EAST STATE STREET, SUITE 1000</p> <p>9 COLUMBUS, OHIO 43215</p> <p>10 (614)221-4000</p> <p>11 (614)221-4012</p> <p>12 DBREY@CWSLAW.COM</p> <p>13</p> <p>14</p> <p>15 BRUCE FEIN</p> <p>16 BRUCE FEIN &amp; ASSOCIATES</p> <p>17 1025 CONNECTICUT AVENUE, N.W., SUITE 1000</p> <p>18 WASHINGTON, DC 20036</p> <p>19 (703)963-4968</p> <p>20 (703)370-1398</p> <p>21 BRUCE@THELICHFIELDGROUP.COM</p> <p>22</p> <p>23</p> <p>24</p> <p>25</p>	<p>2</p>	<p>1</p> <p>2 APPEARING ON BEHALF OF THE RESPONDENT VIA TELEPHONE:</p> <p>3 MARK GERAGOS</p> <p>4 GERAGOS &amp; GERAGOS</p> <p>5 ENGINE CO. NO. 28</p> <p>6 644 SOUTH FIGUEROA STREET</p> <p>7 LOS ANGELES, CALIFORNIA 90017</p> <p>8 (213) 625-3900</p> <p>9 (213) 625-1600</p> <p>10 GERAGOS@GERAGOS.COM</p> <p>11</p> <p>12</p> <p>13 ALSO PRESENT:</p> <p>14 DAVID KRICKORIAN</p> <p>15</p> <p>16</p> <p>17</p> <p>18</p> <p>19</p> <p>20</p> <p>21</p> <p>22</p> <p>23</p> <p>24</p> <p>25</p>	<p>4</p>
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<p>1</p> <p>2 APPEARING ON BEHALF OF THE RESPONDENT:</p> <p>3 CHRISTOPHER P. FINNEY</p> <p>4 JOSHUA B. BOLINGER</p> <p>5 FINNEY STAGNARO SABA &amp; PATTERSON</p> <p>6 2623 ERIE AVENUE</p> <p>7 CINCINNATI, OHIO 45208</p> <p>8 (513) 533-2700</p> <p>9 (513) 533-2999</p> <p>10 CFINNEY@PSSP-LAW.COM</p> <p>11</p> <p>12</p> <p>13 CURT C. HARTMAN</p> <p>14 THE LAW FIRM OF CURT C. HARTMAN</p> <p>15 3749 FOX POINT COURT</p> <p>16 AMELIA, OHIO 45102</p> <p>17 (513)752-8600</p> <p>18 (513)943-0142</p> <p>19 HARTMANLAWFIRM@FUSE.NET</p> <p>20</p> <p>21</p> <p>22</p> <p>23</p> <p>24</p> <p>25</p>	<p>3</p>	<p>1</p> <p>2</p> <p>3</p> <p>4</p> <p>5 DIRECT EXAMINATION BY MR. FINNEY</p> <p>6</p> <p>7</p> <p>8 Exhibit</p> <p>9</p> <p>10 A TODAY'S ZAMAN</p> <p>11 B COMPLAINT 7/21/09</p> <p>12 C COMPLAINT 4/29/09</p> <p>13 D GENOCIDE</p> <p>14 E TCA ISSUE PAPER 57</p> <p>15 F LETTER DATED 9/19/2009</p> <p>16 G LETTER TO THE TAC</p> <p>17 H PHOTOS</p> <p>18 I CONTRIBUTION RECORDS</p> <p>19 J COPY OF HOUSE RESOLUTION 106</p> <p>20 K COPY OF HOUSE RESOLUTION 252</p> <p>21 L SOUTHERN POVERTY LAW CENTER</p> <p>22 M LETTER TO MR. BENNETT</p> <p>23 N CALENDAR ENTRY FOR 11/17/08</p> <p>24 O CALENDAR ENTRY FOR 3/22/07</p> <p>25</p>	<p>5</p>
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CERTIFIED QUESTIONS		
		Page
1		
2		
3		
4		
5	1	43
6	2	55
7	3	56
8	4	56
9	5	113
10	6	113
11		
12		
13		
14		
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16		
17		
18		
19		
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PROCEEDINGS

THE VIDEOGRAPHER: We are now on the video record. My name is Stephen Tronccone, and I'm the video technician today. We will record today's testimony under the firm Kentuckiana Reporters. Today is the 24th day of August, 2009. The time on the video monitor is approximately 10:55 a.m. We are at the Sheridan Hotel to take the deposition of Jean Schmidt in the matter of Jean Schmidt versus David Krikorian pending before the Ohio Elections Commission, case number 2009E-003 and 2009E-012.

THE VIDEOGRAPHER: Will counsel please identify themselves for the record?

MR. FINNEY: My name is Christopher Finney, F-I-N-N-E-Y, attorney for Respondant David Krikorian.

MR. BOLINGER: Joshua Bolinger, B-O-L-I-N-G-E-R, attorney for David Krikorian.

MR. HARTMAN: Curt -- Curt Hartman, counsel for Mr. Krikorian.

MR. BREY: Donald Brey, B-R-E-Y, counsel for Congresswoman Jean Schmidt.

MR. FEIN: Bruce Fein, F-E-I-N, counsel for Congresswoman Jean Schmidt.

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STIPULATION

The deposition of Jean Schmidt, taken in the offices of the Sheraton Cincinnati Airport Hotel, 2826 Terminal Drive, Hebron, Kentucky, on Monday, the 24th day of August, at approximately 10:55 a.m.; said deposition being taken pursuant to Notice for use in accordance with the Kentucky Rules of Civil Procedure.

It is agreed that Annemarie Grant, being a Notary Public and Court Reporter for the State of Kentucky, may swear the witness and that the reading and signing of the completed transcript by the witness is not waived.

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THE VIDEOGRAPHER: Ms. Schmidt, will you please raise your right hand and be sworn by the court reporter?

THE WITNESS: (Complies.)

COURT REPORTER: Do you solemnly swear or affirm that the testimony that you're about to give will be the truth, the whole truth, and nothing but the truth?

THE WITNESS: I do.

COURT REPORTER: Thank you.

THE VIDEOGRAPHER: You may proceed.

MR. FINNEY: Thank you.

DIRECT EXAMINATION

BY MR. FINNEY:

Q. Mrs. Schmidt, you've had your deposition -- I'm sorry.

Please state your full name and address for the record.

A. My full name is Jeannette Schmidt, and I live at 771 Wards Corner Road, Loveland, Ohio.

Q. Have you had your deposition taken before?

A. Yes.

Q. In what circumstances?

A. A variety.

Q. Okay. Please tell us each one of those

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1 circumstances.

2 A. I can only tell you the ones that come to my

3 mind at this point. Actually, I can't because we're on

4 record, and I'm not quite sure what those depositions

5 were or when they did occur, but I'm sure you can

6 remind me.

7 Q. Okay. So sitting here today, you don't ever

8 remember your deposition being taken in any specific

9 case?

10 A. I do remember depositions being taken, yes.

11 Q. Okay. Well, tell me what those cases were

12 that you do remember.

13 A. I can't definitively tell you which cases I

14 was deposed in and which cases I wasn't deposed in.

15 Q. I understand that. Tell me what you can tell

16 me about what you remember about having your deposition

17 taken previously.

18 A. Since we're under oath, I don't want to make

19 a mistake. So therefore, until I can see whatever you

20 have in front of you, I am not prepared to answer that

21 question.

22 Q. Well, just to get past this procedural issue,

23 I don't have anything in front of me and I have no idea

24 other than the Elections Commission case that I was a

25 part of previously. Any other case in which you were

12

1 (OFF THE RECORD)

2 THE VIDEOGRAPHER: We're now back on the

3 video record.

4 BY MR. FINNEY:

5 Q. Mrs. Schmidt, when we adjourned before, I

6 asked you to tell me any other time when you've had

7 your deposition taken and you've conferred with your

8 attorney. And you're now -- do you have any different

9 response than what you gave me previously?

10 A. I wanted to make sure that I was giving the

11 correct response. I have been deposed a number of

12 times in my life.

13 As a township trustee, I have been deposed on

14 zoning cases. I don't remember the particulars. The

15 first time I met Mr. Brey was on an Ohio Elections

16 case. I don't remember the particulars of the case,

17 but I was deposed. I have been deposed on telephone by

18 you and in other cases before the Ohio Elections

19 Commission.

20 Q. So this is at least the third case you've

21 been involved with with the Ohio Elections Commission?

22 A. Yes.

23 Q. Okay. And what was the -- I know about the

24 false statement case in '05, I think it was. What was

25 the -- or '06, I guess -- what was the other one?

11

1 deposed, I'm just asking to you to tell us what you

2 know about that issue.

3 A. I don't remember the case, sir. I'm --

4 Q. Okay. So you have no recollection of any

5 cases in which your deposition was previously taken?

6 A. I remember I was deposed, but you were not

7 there. You were on a telephone.

8 Q. Okay. So that was in the prior Ohio

9 Elections Commission case dealing with your false

10 statements; is that correct?

11 A. Again, sir, you're going to have to tell me

12 what you're getting at because I'm under oath, and I

13 have to tell the truth.

14 MR. FINNEY: Don, I'd ask you to instruct

15 your client to answer the question, or we'll have to

16 get Phil on to make her answer the question. Either

17 she does or she doesn't remember. If she doesn't,

18 fine. If she does, she needs to tell me what she

19 remembers.

20 MR. BREY: You want me to talk with her off

21 the record?

22 MR. FINNEY: I think it might be appropriate

23 to adjourn and take her out of the room. Yeah, that's

24 fine.

25 THE VIDEOGRAPHER: Please stand by.

13

1 A. Well, the other one was an individual that

2 decided to contest the fact that I did run a marathon

3 in October of 2003 --

4 Q. Oh, the name on the case --

5 A. -- and I actually did a 3:19:09.

6 Q. Okay. All right. So the -- the -- the way

7 that this works is that the court reporter is really in

8 charge here today. And that means that we have to not

9 talk over each other. You have to let me finish my

10 questions; you need to let -- I need to let you finish

11 your answers.

12 Uh-huhs and uh-uhs and nods of the head and

13 shakes of the head don't transcribe -- not just very

14 well, they don't transcribe at all. So if we would

15 just try to proceed in an orderly fashion.

16 Also, it's not my intention to trip you up or

17 to create problems; it's to get information out to the

18 Elections Commission hearing. So if you don't

19 understand a question that I have, if it's a compound

20 question that's confusing you, just ask me to rephrase

21 it and I will try to do that. Okay?

22 A. Uh-huh.

23 Q. Great.

24 A. Of course.

25 Q. Now my first question today is: Can you tell

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11-11-2011 11:00:00 AM

14

1 me what your understanding is of the events in the  
 2 Ottoman Empire in 1915 that have variously been  
 3 referred to as the "Armenian Genocide," the "Great  
 4 Calamity," the "Armenian Holocaust," or the "Armenian  
 5 Massacres"?

6 A. Could you repeat that question? It was a  
 7 little long.

8 Q. Yeah. I'm trying to get your understanding  
 9 of what those events were. What -- what do you  
 10 understand historically occurred in 1915, 1916?

11 A. Well, there was World War I.

12 Q. No. No. I'm talking about specifically in  
 13 the Ottoman Empire, the events known as the "Armenian  
 14 Genocide," the "Great Calamity," the "Armenian  
 15 Holocaust," or the "Armenian Massacres." The thing  
 16 that's the subject of this Elections Commission  
 17 complaint.

18 A. I was trying to get to that. It was during  
 19 World War I. And during World War I a lot of things  
 20 occurred. Other than that, I don't have any  
 21 recollection because I wasn't there, I wasn't born, and  
 22 nor am I a historian.

23 Q. Okay. So that's the full sum and substance  
 24 of your understanding of what happened in 1915 related  
 25 to the Armenian Genocide, the Great Calamity --

16

1 MR. FINNEY: Well, we're going to get to  
 2 that. I mean, I wanted to know what the basis of her  
 3 knowledge was.

4 But normally, when people have an  
 5 understanding of an historical event, they can tell you  
 6 generally what they believe happened at that time.

7 MR. FEIN: Based upon?

8 BY MR. FINNEY:

9 Q. Hitler rose to power, he started -- he  
 10 invaded Poland, he started World War II, etc. I mean,  
 11 and then kind of get -- and then the Allies invaded  
 12 Normandy and won the war. You know, that kind of  
 13 thing.

14 Do you have any understanding of what  
 15 happened relating to this historical event? Did people  
 16 die? If so, how did they die? Was the government  
 17 involved, and so on. What is your understanding of what  
 18 occurred with respect to the Armenian Genocide in 1915  
 19 and 1916?

20 MR. BREY: I would just object. I -- I  
 21 assume that you asked a series of questions, and that  
 22 there's just the last one you wanted a response to.

23 MR. FINNEY: It was really -- I'm on the  
 24 first question which is: I just want to understand her  
 25 full understanding of what occurred that is the subject

15

1 whatever they call it; is that right?

2 A. My full understanding?

3 Q. Correct.

4 A. I -- in a nutshell, yes.

5 Q. Well, I don't want a nutshell. I want to  
 6 know in an expanded version, what do you understand  
 7 occurred with respect to those historical events?

8 A. You know, I am not a student of history. I  
 9 wasn't there. I'm still trying to figure it all out.

10 Q. Okay. So -- so your full understanding of  
 11 the events of that time known as the "Great Calamity"  
 12 or the "Armenian Holocaust," the "Armenian Massacres,"  
 13 is just that something happened during World War I and  
 14 you know nothing more about it than that?

15 A. About what actually happened at that period?  
 16 Exactly.

17 Q. Correct. I want to know what your  
 18 understanding is.

19 A. That's the understanding.

20 Q. And you know of no other facts, no other  
 21 interpretations, other than that?

22 MR. FEIN: Are you asking -- can you clarify,  
 23 Mr. Finney? You know, "do you know of any other" --  
 24 you mean personal facts? Are you asking whether she's  
 25 read books? That's a highly ambiguous statement.

17

1 of this complaint which is known as the "Armenian  
 2 Genocide." What is her understanding? I'm not asking  
 3 her what happened. I'm asking her what her  
 4 understanding of what happened was.

5 MR. FEIN: I object.

6 MR. BREY: First of all, it's a not the  
 7 subject of this complaint.

8 MR. FEIN: Yeah.

9 MR. BREY: And, Chris, asking for her full  
 10 understanding is really not an appropriate request.

11 MR. HARTMAN: Let me clarify: We've got one  
 12 -- usually in a deposition, one counsel is defending  
 13 and not two counsels.

14 MR. BREY: Then why are you speaking?

15 MR. HARTMAN: Because I'm trying to clarify  
 16 for the record who is defending this deposition.

17 MR. FINNEY: I'm sorry. So where do we  
 18 stand? Are you telling her not to answer?  
 19 (TELEPHONIC INTERRUPTION)

20 MR. FINNEY: That's the Geragos call.

21 MR. KRICKORIAN: Hello?

22 MR. GERAGOS: Hi. It's Mark.

23 MR. KRICKORIAN: Hello Mark. This is Mark  
 24 Geragos. He is one of my attorneys in this case.

25 MR. FINNEY: Mark, you can just listen in.

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14-00000-1

18

1 If you have any comment, you may want to call in on  
 2 another phone to Josh who can relay your comments to  
 3 me, okay?  
 4 MR. GERAGOS: Got it.  
 5 MR. FINNEY: Josh, do you want to give him  
 6 your number so he's got that.  
 7 MR. BOLINGER: Yeah.  
 8 MR. GERAGOS: Just -- he can E-mail it to me.  
 9 MR. BOLINGER: Yeah, I'll e-mail it when we  
 10 get off the phone.  
 11 MR. FINNEY: Okay. Thank you.  
 12 BY MR. FINNEY:  
 13 Q. Mrs. Schmidt, when we broke, the last  
 14 question was: Tell me your understanding of the events  
 15 in the Ottoman Empire in 1915 that's been referred to  
 16 as the "Armenian Genocide." Your attorney has raised an  
 17 objection to that question.  
 18 MR. FINNEY: Don, are you asking her not to  
 19 respond, or are you telling her to respond?  
 20 MR. BREY: Go ahead -- I haven't instructed  
 21 her anything. I've raised an objection as to the  
 22 question.  
 23 MR. FINNEY: Okay, fine.  
 24 Q. So my question again is: Have you given me  
 25 your full understanding of what happened in the

20

1 that you know about the Armenian Genocide?  
 2 A. That I know? I wasn't there, so, yes.  
 3 Q. Okay. Have you told me your full  
 4 understanding of what happened with respect to the  
 5 Armenian Genocide?  
 6 A. I don't have a full understanding.  
 7 Q. All right. Do you -- do you have an  
 8 understanding of anything other than what you've  
 9 related to me with respect to that event?  
 10 A. I'm not a student of history. I'm still  
 11 trying to figure it all out.  
 12 MR. FINNEY: Don, I'd just like you to ask  
 13 her to answer the question which is: Do you -- have  
 14 you told me everything that you know and understand or  
 15 not? I didn't ask her to tell me she's not a student  
 16 of history. I just -- it's a "yes" or "no" question.  
 17 MR. BREY: Well, I -- think the question is  
 18 ambiguous on a number of levels. One, you're using the  
 19 term "Armenian Genocide" which is -- is not a term  
 20 that, you know, is -- is -- is really -- everyone  
 21 embraces.  
 22 MR. FINNEY: Right. That's why I used four  
 23 terms.  
 24 MR. BREY: Second, you're asking about  
 25 knowledge, then you're asking about opinions, then

19

1 Armenian Genocide in 1915?  
 2 A. Yeah.  
 3 Q. You have no knowledge of any other facts, you  
 4 have no knowledge of any other opinions or points of  
 5 view other than what you've already stated; is that  
 6 correct?  
 7 A. Repeat it with the term "knowledge."  
 8 Q. Well, again, I'm not asking you to tell me  
 9 what happened; none of us were there, okay? I'm asking  
 10 you your understanding of what happened.  
 11 Your answer was: An event happened that  
 12 constituted World War I --  
 13 A. No. I didn't say it constituted World War I.  
 14 I said it was during World War I.  
 15 Q. It happened during World War I. A lot of  
 16 things happened during World War I, and you know  
 17 nothing about it other than that. That was your --  
 18 essentially your statement.  
 19 And I'm just asking you: Is that your full  
 20 understanding, or is that your truncated understanding?  
 21 I'd like to know your full understanding of what  
 22 happened with respect to those events.  
 23 A. Well, I'm not a student of history, and I'm  
 24 still trying to figure it all out.  
 25 Q. Okay. Have you told me everything, then,

21

1 you're asking about other things that are irrelevant to  
 2 the case.  
 3 I think the witness is trying to respond as  
 4 best she can, but the question is ambiguous.  
 5 MR. FINNEY: Okay. Well, let me try it  
 6 again.  
 7 BY MR. FINNEY:  
 8 Q. My original question was to tell me your  
 9 understanding of the events in the Ottoman Empire in  
 10 1915 that has variously been referred to the "Armenian  
 11 Genocide," the "Great Calamity," and the "Armenian  
 12 Holocaust" and the "Armenian Massacres." Generally,  
 13 we're talking about the events that are really the  
 14 subject of this complaint, okay?  
 15 MR. BREY: I -- I -- I would object. They're  
 16 not the subject of this complaint.  
 17 MR. FINNEY: Let me -- let me finish -- let  
 18 me finish what I'm saying, and you can then state your  
 19 objection, okay?  
 20 MR. FINNEY:  
 21 Q. So you then gave me a response. And all I'm  
 22 asking you, is that your full response to that  
 23 question? You have no knowledge, you have no  
 24 understanding of any other facts relating to that other  
 25 than what you've told me so far; is that correct?

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22

1 A. I am not a student of history. I'm not a  
 2 scholar of history. I didn't know that this event even  
 3 occurred until Mr. Krikorian brought it to my  
 4 attention. I'm still trying to sort it all out.  
 5 So I can't give you an answer today as to  
 6 what my opinions are or what the facts are because I  
 7 haven't gathered all the facts, and I haven't rendered  
 8 an opinion.  
 9 Q. Okay. And I didn't ask you for facts or  
 10 opinions. I just asked you for any further information  
 11 on your understanding of those events. And you either  
 12 have them or you don't. It's a "yes" or "no" question.  
 13 Do you have any further understanding of  
 14 those events, and if so, please relate those to me.  
 15 A. Sir, I really don't get what you're trying to  
 16 get with "understanding of the events." I wasn't  
 17 there.  
 18 Q. Okay. For example, do you -- do you have any  
 19 understanding of how many persons were killed or who  
 20 died as a result of those events?  
 21 A. Do I have an understanding?  
 22 Q. Yes.  
 23 A. I'm not sure. I don't know what that word  
 24 means.  
 25 Q. Okay. Do you know how these people were

23

1 killed? Do you have any understanding of how these  
 2 people were killed?  
 3 A. No.  
 4 Q. Okay. What is your understanding of what  
 5 occurred that -- I'm sorry.  
 6 Do you know -- for example, do you know if  
 7 the government was responsible for the deaths that  
 8 occurred, or if it was just a result of some civil  
 9 strife?  
 10 A. From what has been gathered, there has been  
 11 no trial to determine whether the government was  
 12 involved or not.  
 13 Q. Let me ask you about the Jewish Holocaust.  
 14 Have you heard about the events that constitute the  
 15 Jewish Holocaust?  
 16 MR. BREY: I -- I -- I would object as to  
 17 relevancy. You can answer the question.  
 18 A. Yes.  
 19 Q. Okay. Now, you weren't there for those  
 20 events, were you?  
 21 A. No.  
 22 Q. Okay. So how is it that you have an  
 23 understanding of what happened at the Jewish Holocaust?  
 24 A. Well, first off, there was a trial to which  
 25 the people that perpetrated the crime were convicted.

24

1 Second, I've had the opportunity to witness  
 2 the death camps.  
 3 Third, I've had the opportunity to get to  
 4 know Holocaust survivors, including Gerda Klein, who is  
 5 a world-renowned author of her experiences.  
 6 Fourth, I had the opportunity to meet with  
 7 one of the JAG officers that was part of the Nuremberg  
 8 Trial, and so --  
 9 And fifth, that was studied pretty much in  
 10 school from the time I was in the fourth grade.  
 11 So the Holocaust -- oh, and I've been to the  
 12 Holocaust museums, both in the United States, in  
 13 Germany, and in Israel.  
 14 Q. Okay.  
 15 A. So I've had an opportunity to witness the  
 16 aftermath, see pictures, and have a clearer  
 17 understanding because perhaps, 45 of my years of life --  
 18 -- and I'm just guessing at the age -- I don't know when  
 19 I first had this part of history, but sometime in late  
 20 grade school or early high school, I learned about the  
 21 Holocaust.  
 22 Q. Okay. And -- so then -- then the question  
 23 becomes: Have you seen, read, or heard anything about  
 24 these events that we're talking about today which are  
 25 the Armenian Genocide, the Great Calamity, the Armenian

25

1 Holocaust?  
 2 A. I've read things about it, yes.  
 3 Q. Okay. And -- but based upon the stuff you've  
 4 seen, read, and heard about the Holocaust, you've  
 5 developed some understanding of it.  
 6 Based upon what you've seen, read, and heard  
 7 about the Armenian Genocide, you have no understanding  
 8 of it?  
 9 MR. BREY: Objection.  
 10 A. I have a limited understanding because I  
 11 don't have the same experience with history that I do  
 12 with the Holocaust.  
 13 Q. Okay. I'm going to give you something that's  
 14 been marked as Exhibit A. That is a -- an article from  
 15 a newspaper called The Daily -- I'm sorry, "Today's  
 16 Zaman."  
 17 Do you know what that is? What is "Today's  
 18 Zaman"?  
 19 A. (Perusing document.)  
 20 Q. Do you know what "Today's Zaman" is, Mrs.  
 21 Schmidt?  
 22 A. May I please have time to read this, sir?  
 23 Q. Oh, I'm sorry. Yes. Sure.  
 24 (EXHIBIT A MARKED FOR IDENTIFICATION)  
 25 A. (Perusing document.)

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10-11-2009 14:00:01

26

1 Q. Okay. Mrs. Schmidt, what is "Today's Zaman"?

2 A. I believe it's a periodical in Turkey.

3 Q. Okay. It's a -- it's a newspaper in Turkey.

4 Would that would be your understanding?

5 A. Periodical, newspaper, something that is read

6 by Turkey's citizens.

7 Q. Okay. And on June the 4th of this year, you

8 -- you were published in Today's Zaman in Turkey; is

9 that correct?

10 A. Yes.

11 Q. You wrote an editorial?

12 A. Yes.

13 Q. And that was to coincide with President

14 Obama's visit to that country; is that correct?

15 A. Well, it coincided with his visit, yes.

16 Q. That wasn't the purpose of it, to coincide?

17 A. No. It wasn't the purpose, but it did

18 coincide.

19 Q. Did you write this editorial?

20 A. Yes.

21 Q. You did? These are your words?

22 A. Yes.

23 Q. Did anyone else help you to write it?

24 A. I had it edited by my chief of staff.

25 Q. Okay. And did any outside person, such as

28

1 Do you see that?

2 A. Yes.

3 Q. What -- what are you referring to that

4 happened in 1915 that must never be forgotten?

5 A. Well, there obviously was an incident that

6 happened in 1915.

7 Q. And what was that incident?

8 A. Well, there was something that went on in

9 Turkey that involved Turks and Armenians.

10 Q. Okay. And what is it that you remember about

11 -- or that you know or have an understanding of about

12 those events?

13 A. Well, I don't remember them because I wasn't

14 there.

15 Q. Right.

16 A. And I'm still trying to have a complete

17 understanding of those events.

18 Q. I understand that. But you told all the

19 people of Turkey that we shouldn't forget these events.

20 I'm asking you: What is it that we're supposed to

21 remember?

22 A. Well, we shouldn't forget the past.

23 Q. And what is it about the events of 1915 that

24 we're supposed to remember?

25 A. When I become a scholar of this, I'll let you

27

1 Mr. Fein or anyone else, help to write this?

2 A. No.

3 Q. You had it edited, but the original draft

4 came off of your word processor or pen; is that right?

5 A. Well, I don't use a word processor.

6 Q. Okay. So the original draft was a

7 handwritten version from you?

8 A. Actually, it was an oral version to my chief

9 of staff.

10 Q. You dictated this to him?

11 A. The ideas of it, yes.

12 Q. Okay. And in this, you talk about the

13 Armenian Genocide Resolution, right?

14 A. Where are you putting this in here so I know

15 what you're referring to?

16 Q. Well, we could start with the bold headline

17 that says: "US Congress should not debate the Armenian

18 genocide resolution."

19 A. Okay.

20 Q. Were those your words, or was that something

21 the Daily [sic] Zaman added?

22 A. That I'm not sure of.

23 Q. Okay. Now, in the -- in the very last

24 paragraph of that it says, "What happened in 1915 must

25 never be forgotten."

29

1 know.

2 Q. Okay. But when you wrote this on June the

3 4th of 2009, you had no understanding at all of what

4 happened in Turkey in 1915 then; is that right?

5 A. I said I had limited understanding.

6 Q. Okay. And I've asked you four times this

7 morning to tell us what that limited understanding is,

8 and you've told me nothing.

9 A. Well, basically, that events happened.

10 Q. Events happened. And what were those events?

11 A. People got killed on both sides. How many

12 people? I don't know.

13 Q. And that's your total sum and substance of

14 your understanding of that event?

15 A. That's about the basic understanding, yes.

16 Q. Do you have knowledge of an historical figure

17 by the name of Atatfrom Turkey?

18 A. Yes.

19 Q. Who was Atat

20 A. Atatfought in World War I. He also became

21 the first modern-day leader of Turkey.

22 Q. Okay. Is that the total sum and substance of

23 your understanding of Atat

24 A. I know that he secularized Turkey, put it in

25 a -- he allowed it to become a modern country.

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1 Q. Okay. And do you have anything else to share  
 2 with us about Atat Do you have any understanding -- any  
 3 other understanding about Atatinvolvement in Turkish  
 4 history or world history?  
 5 A. He fought bravely, according to the Turks in  
 6 World War I, and he became their leader and he  
 7 modernized Turkey. He secularized Turkey. He refused  
 8 to let religion become part of its constitution or its  
 9 government. He created a secular Turkey.  
 10 Q. Okay. Now, with respect to the events we're  
 11 going to -- I'm going to refer to them today as the  
 12 "Armenian Genocide." Again, these are the things that  
 13 are talked about in the complaint so we -- just so we  
 14 have an understanding.  
 15 What authors or what third -- I'm sorry.  
 16 What books or third-party sources have you  
 17 considered -- have you read -- have you -- have you  
 18 read any books about the Armenian Genocide?  
 19 A. Yes.  
 20 Q. You have? What book have you read?  
 21 A. I can't remember at this point. I read a ton  
 22 of books each year.  
 23 Q. So you say -- you -- you'd never even heard  
 24 of the Armenian Genocide until Mr. Krikorian first told  
 25 you about it?

1 information about the Armenian Genocide?  
 2 A. I can only -- only one.  
 3 Q. Okay. And who was that?  
 4 A. You know, I think the name was Guenter Lewy's  
 5 book --  
 6 Q. Okay.  
 7 A. -- but I could be wrong with the way I'm  
 8 pronouncing it.  
 9 Q. Okay. And you read Guenter Lewy's book?  
 10 A. Yes.  
 11 Q. And you believe that to be authoritative on  
 12 the question of the Armenian Genocide?  
 13 A. Authoritative? I believe it is a book that  
 14 talks about the situation that occurred in 1915. I  
 15 don't believe that it is the be-all/end-all book.  
 16 Q. Okay. And you've read the entire book, and  
 17 yet today, you can't tell me anything other than that  
 18 some people died and it was during World War I?  
 19 A. Yes. Because I can't remember everything in  
 20 that book. I read a ton of books.  
 21 Q. I didn't ask you to remember everything in  
 22 the book.  
 23 I asked you: Do you remember anything else in the  
 24 book other than those two things?  
 25 A. That was the, you know -- the gist that came

1 A. Right.  
 2 Q. And when was that?  
 3 A. When he came to my office.  
 4 Q. And when was that? Just give me a month, a  
 5 year.  
 6 A. I couldn't tell you.  
 7 Q. Was it within the last 24 months?  
 8 A. Twenty-four months? No.  
 9 Q. Well, let's just say it's -- it's been since  
 10 you've been in Congress.  
 11 A. Right.  
 12 Q. Okay. And how many books about the Armenian  
 13 Genocide have you read since you've been in Congress?  
 14 A. Specific books or books that have ancillary  
 15 opinions or --  
 16 Q. Either one -- either way -- either that are  
 17 specifically --  
 18 A. I couldn't tell you.  
 19 Q. Okay. More than one?  
 20 A. Probably.  
 21 Q. Okay. Can you --  
 22 A. Absolutely more than one, but I don't know  
 23 how many.  
 24 Q. Okay. Can you name a single book title or a  
 25 single author that you've read that gave you

1 out of that book was that there are questions about  
 2 what happened and how you can characterize what  
 3 happened.  
 4 Q. Okay. And have you read any articles or  
 5 periodicals or newspaper articles about the Armenian  
 6 Genocide?  
 7 A. I'm sure I have.  
 8 Q. Okay. Can you -- do you recall any authors  
 9 or any specific articles?  
 10 A. No.  
 11 Q. When did you read these articles?  
 12 A. Couldn't tell you.  
 13 Q. Okay. Have you read anything to prepare for  
 14 the deposition today?  
 15 A. No.  
 16 Q. Okay. Why don't you tell us, what is  
 17 "genocide"? Do you have an understanding of what  
 18 genocide is?  
 19 A. I do have an understanding of what genocide  
 20 is.  
 21 Q. Okay. Why don't you tell us?  
 22 A. It is my understanding from the United  
 23 Nation's definition that it has to be government  
 24 sponsored, and it has to deal with some -- I'm probably  
 25 excluding some because I don't have it, their clear

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1 definition, written down -- either ethnic cleansing or  
2 religious cleansing, and it has to be government  
3 sponsored. And I think that there are a couple of more  
4 things in there.

5 Q. Okay. So your understanding of genocide is  
6 that it's -- it's related to an ethnic group or a  
7 religion and has to be government sponsored. And what  
8 else?

9 A. That's all I know that I can remember at this  
10 point.

11 Q. Okay. When you say "cleansing," do you mean,  
12 like, just having them leave the area or are you  
13 talking about murdering people?

14 A. Well, that's what I believe their term is.  
15 So I -- you know, I'm not an attorney. I'm not going  
16 to make assumptions on what that means.

17 Q. I'm not asking about your assumptions; I'm  
18 asking for your understanding. Your understanding  
19 might be right, it might be wrong, it might be complete  
20 or incomplete. That's fine.

21 I'm just trying to get your understanding of  
22 what the term "genocide" is. Does it involve the death  
23 of people or just asking them to forcibly leave a  
24 particular area?

25 A. I don't know.

1 Q. Okay. You -- you are not -- are you or are  
2 you not aware that some people have advanced that  
3 theory?

4 A. I'm still trying to figure out what the  
5 theory is.

6 Q. The theory is that denial is part of the  
7 process of genocide or part of the act of genocide.

8 Are you aware that some people assert that or  
9 not?

10 A. No.

11 (EXHIBIT B MARKED FOR IDENTIFICATION)

12 Q. Okay. And then in your complaint --  
13 actually, I looked at four different paragraphs. You  
14 tell us that you do not deny that the Armenian Genocide  
15 occurred. That that's -- I'll just read you a couple  
16 things from your complaint. In paragraph 8, you say --

17 A. Where -- where -- what document? Can I read  
18 the whole document?

19 MR. FINNEY: Well, it's just your complaint  
20 before the Ohio Elections Commission.

21 A. I know, but -- but I don't have a copy of it  
22 in front of me.

23 MR. FINNEY: Okay. Well, that's fine.

24 That's fine. This is going to be an exhibit. What is  
25 that with the exhibits?

1 Q. Okay. Thank you. Now, there are some  
2 authors who have suggested that continuing the denial  
3 of an event constitute part of the genocide itself --  
4 that the -- that the genocide continues after the fact  
5 with a cover-up and denial of those events.

6 Have you heard any of those  
7 interpretations?

8 A. Could -- could you repeat that because you  
9 were fumbling with the papers, and I couldn't really  
10 understand what you were saying.

11 Q. Okay. Well, just listen to my words. You  
12 don't have to watch my hands, okay?

13 My question was: There are some authors who have  
14 suggested that part of the act of genocide includes the  
15 denial of the genocide that occurs after the fact.

16 That -- that the process of genocide is -- is not just  
17 what happens to the people who are subject to it, but  
18 also that -- that afterwards, that there's a  
19 coordinated attempt to deny the fact that that  
20 occurred.

21 Are you familiar with any of those  
22 interpretations of the -- the -- the process of  
23 genocide?

24 A. That's interesting, and I think it's a little  
25 convoluted, but that's an interesting interpretation.

1 MR. BOLINGER: This is actually -- I think  
2 that might be the second complaint, Chris.

3 MR. FINNEY: Oh, I'm sorry. You're right.

4 MR. BOLINGER: I think this would be --

5 MR. FINNEY: Okay. That's all right. We'll  
6 let her hold onto that. That's fine. (Handing.)

7 Do you have enough copies for Mr. Brey and Mr. Fein of  
8 that?

9 A. Okay. Paragraph 8 here says --

10 MR. FINNEY: No. No.

11 A. -- the above --

12 MR. FINNEY: Mrs. Schmidt, Mrs. Schmidt --

13 THE WITNESS: -- sentence falsely accuses me,  
14 Jean Schmidt, of taking --

15 MR. FINNEY: Don, can you stop her, please?

16 MR. BREY: He hasn't asked you a question.

17 You can respond to the question when he asks it.

18 THE WITNESS: Oh, well, he said paragraph 8.  
19 Okay.

20 MR. FINNEY: Well, I'll -- I'll ask the  
21 question; you answer. I'm actually going to ask you to  
22 refer to Exhibit C.

23 (EXHIBIT C MARKED FOR IDENTIFICATION)

24 Q. In paragraph 8 you start off and you say, "I  
25 have never denied an Armenian Genocide."

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1 Do you see that there?  
 2 A. Yes.  
 3 Q. And in paragraph 12 you say, after an  
 4 introductory phrase, I have not "denied the Armenian  
 5 Genocide."  
 6 Do you see that there?  
 7 A. Yes.  
 8 Q. And my question is: What is your position on  
 9 whether or not an Armenian Genocide occurred?  
 10 A. Part of the definition is that it has to be  
 11 government sponsored. And from what I have gleaned,  
 12 and I am not a student of history, there has not been  
 13 any definitive position that it was government  
 14 sponsored. There has never been a tribunal that has  
 15 stated it one way or the other.  
 16 Q. Okay.  
 17 A. I am still trying to gather information  
 18 regarding this aspect of history.  
 19 Q. And what are you doing to gather that  
 20 information?  
 21 A. When time permits, reading this -- reading,  
 22 talking, surfing the Internet, whatever it takes to get  
 23 that information. But it's very limited because time  
 24 is precious, and I have to learn other things too.  
 25 Q. And you've read Guenter Lewy's book to help

1 you to understand that?  
 2 A. Quite some time ago, yes.  
 3 Q. About how many pages was Guenter Lewy's book?  
 4 A. I don't know.  
 5 Q. Is it more than a hundred?  
 6 A. Oh, yeah.  
 7 Q. It is -- it's a long book.  
 8 A. Oh, I don't think it's a long book; I think  
 9 it's a medium-sized book.  
 10 (EXHIBIT D MARKED FOR IDENTIFICATION)  
 11 Q. Okay. Well, let's look at Exhibit D just so  
 12 -- I'm just trying to understand your position. This  
 13 is the definition of genocide that's been adopted by  
 14 the United Nations.  
 15 Have you ever seen this before?  
 16 A. (Perusing document.) Actually -- I -- I  
 17 think -- I -- I'm not sure where you got this document.  
 18 Q. Okay. So do you -- do you acknowledge the  
 19 United Nations' definition of genocide when you were  
 20 referring to --  
 21 A. Is this the United Nations document?  
 22 Q. It is, yes.  
 23 MR. BREY: I -- I would object. In fact,  
 24 this is not. This is a summary of the United States  
 25 treaty language. It is not the treaty language itself.

1 MR. FINNEY: I got you. Okay.  
 2 BY MR. FINNEY:  
 3 Q. Well, let me ask you this: Is it -- is it  
 4 your position at this point that you refuse to  
 5 recognize or acknowledge that the genocide occurred in  
 6 Turkey with respect to the Armenians in 1915 and 1916?  
 7 Is that a safe assessment on your position on that?  
 8 A. Could you repeat that?  
 9 Q. Okay. Is it true that you refuse to  
 10 recognize or acknowledge, as you sit here today, and as  
 11 this has been debated in Congress, that a genocide  
 12 occurred in 1915 and 1916 in what is modern-day Turkey?  
 13 A. I think that's a very misleading question,  
 14 sir. As I've stated before, I have incomplete  
 15 knowledge to determine whether a genocide occurred or  
 16 it didn't occur, and that has been my position all  
 17 along.  
 18 Q. All right. Now, one of your -- well,  
 19 actually, I think this is written by one of your  
 20 attorneys. I could be wrong about that. I'll show you  
 21 what I'm going to mark as Exhibit D (sic).  
 22 Have you ever seen this document before?  
 23 MR. BREY: I think this is E, isn't it?  
 24 MR. FINNEY: E -- I'm sorry. Exhibit E. Let  
 25 me re-mark that. May I?

1 (EXHIBIT E MARKED FOR IDENTIFICATION)  
 2 BY MR. FINNEY:  
 3 Q. Have you ever seen this document before?  
 4 A. No.  
 5 Q. This is published by the Turkish Coalition of  
 6 America. I believe it's authored by your attorney, Mr.  
 7 Fein.  
 8 And why don't you just read to us the fourth  
 9 paragraph of that document?  
 10 A. "Congresswoman Schmidt has, on numerous  
 11 occasions, voiced her opposition to such resolutions  
 12 and then maintains that the historical question is not  
 13 appropriate for Congress to legislate. The  
 14 Congresswoman, based on her independent research, does  
 15 not believe the tragic events of World War I in which  
 16 both Armenians and Turks were killed in harrowing  
 17 numbers constitute genocide, an accusation that has  
 18 never been proven in a court of law. Her conclusions  
 19 accord with renowned Middle East scholar, Bernard Lewis  
 20 of Princeton University, and other respected  
 21 historians."  
 22 Q. Okay. And in there -- again, I believe this  
 23 is written by Mr. Fein, it says that the Congresswoman  
 24 "does not believe that the tragic events of World War  
 25 I," meaning the Armenian Genocide, "constitute

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42

1 genocide."

2 Do you see that? I paraphrased.

3 A. Yes.

4 Q. And is that an accurate reflection of what

5 your position is on the Genocide?

6 A. Well, I think that's Mr. Fein's

7 interpretation.

8 Q. Okay. And I didn't ask you that. I asked

9 you if that's an accurate interpretation of your

10 position, that you don't not believe that the tragic

11 events --

12 A. My position is --

13 Q. Let me finish my question. See, we have to

14 do that for the court reporter.

15 A. Okay.

16 Q. Is it your position that the tragic events of

17 World War I do not constitute genocide dealing with

18 Armenians and Turks?

19 A. I don't think that's what he said.

20 Q. Yeah. Let's read it. I'll paraphrase it

21 here. Does not believe --

22 A. Well, no. Don't paraphrase it. Let's go

23 with what he actually said.

24 Q. Well, let's -- okay. We'll start with the

25 word "does." So Mrs. Schmidt... "does not believe the

44

1 I am asking you: Is that an accurate reflection

2 MR. BREY: I'm going to object --

3 MR. FINNEY: Let me finish the question and

4 then you can object.

5 BY MR. FINNEY:

6 Q. Does that statement reflect accurately your

7 position on the Genocide or not?

8 MR. BREY: I would object. The question has

9 been asked and answered, I believe appropriately. If

10 you -- if you have a different answer, you can tell

11 him. If -- if it's the same answer, you can tell him

12 that.

13 A. It's the same answer. I don't know how -- I

14 -- I -- I have to give you what I believe.

15 MR. FINNEY: I think we'd like to get Phil on

16 the line to see if we can force an answer to that

17 question.

18 MR. BREY: You're -- you're welcome to do it.

19 You're spending your own time. She has answered the

20 question. If -- if her statement position is consistent

21 with that, then it's consistent. If it's inconsistent

22 with that, it's inconsistent. But you can't impeach

23 her that way. He wasn't even her lawyer at that time.

24 MR. FINNEY: I'd like to get Phil on the

25 line. Do you have the number? Do you want to get it,

43

1 tragic events of World War I in which both Armenians

2 and Turks were killed in harrowing numbers constitute

3 genocide."

4 A. That's what Mr. Fein says.

5 Q. Thank you. You've already told me that and

6 that's not my question. My question is: Does that

7 comport with your understanding of the events of 1915

8 in Turkey?

9 A. I've told you that I don't have enough

10 knowledge to determine one way or the other whether it

11 was a genocide.

12 (CERTIFIED QUESTION)

13 Q. Okay. And so, again, I'm going to ask you --

14 Mr. Fein has given us a description of what your

15 position is and I'm asking you: Is that description

16 accurate or inaccurate?

17 A. And I'm telling you that I've always stated I

18 don't have enough knowledge to say whether it was or it

19 wasn't a genocide. I've also said that there has been

20 no tribunal that has put it as a genocide or not as a

21 genocide.

22 Q. Okay. And I'm asking you again: Mr. Fein

23 has said that you do not believe the tragic events of

24 World War I in which Armanian and Turks were killed in

25 harrowing numbers constitutes genocide.

45

1 Josh?

2 MR. BREY: I -- I've got the number.

3 THE VIDEOGRAPHER: Off the record?

4 MR. BREY: Yeah. Off the record.

5 MR. FINNEY: No, stay on the record.

6 MR. HARTMAN: No. We're going to stay on.

7 MR. FINNEY: Please stay on the record.

8 MR. BREY: His number: First push 9, then

9 push 1-614, then 466-3205.

10 OPERATOR: Ohio Elections.

11 MR. FINNEY: We're looking for Phil Richter.

12 This is Chris Finney and Don Brey.

13 MR. BREY: How are you doing?

14 OPERATOR: Oh, very good. Let's see if I can

15 get through to him.

16 (OFFTO VOCE DISCUSSION)

17 OPERATOR: I apologize for the hold. I've

18 tried calling him twice and I've gotten no response. I

19 can -- what-all would you want me to do? You want me

20 to have him give you --

21 MR. FINNEY: We'll just rack up a list of

22 these questions, and when we get him, we'll ask him all

23 of them.

24 OPERATOR: Okay. Well, that would definitely

25 work. I went ahead and left a message to have him check

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46

1 back in.  
 2 MR. FINNEY: Why don't we give you a number  
 3 where he can call. Josh, give him your number.  
 4 OPERATOR: Absolutely. Let me get a pen.  
 5 Okay?  
 6 MR. FINNEY: Yeah.  
 7 MR. BOLINGER: It is --  
 8 MR. FINNEY: Hold on. He's getting a pen.  
 9 Hold on.  
 10 OPERATOR: All set.  
 11 COURT REPORTER: Certified?  
 12 MR. FINNEY: We'll come back to it.  
 13 MR. BOLINGER: Okay. The number to dial  
 14 that'll get you the hotel manager and it's (859) 371-  
 15 6166. And then when you speak with the person there,  
 16 they can patch you into this conference room -- this  
 17 phone. All right?  
 18 OPERATOR: Okay. I will go ahead and give  
 19 him the message when he checks back in and have him  
 20 give you a call.  
 21 MR. BOLINGER: I -- we appreciate it. Thank  
 22 you.  
 23 MR. FINNEY: Thanks.  
 24 OPERATOR: Oh, you're very welcome. Bye-bye.  
 25 MR. FINNEY: There was a question, I don't

48

1 John Paul has said that this was a -- the -- that it  
 2 was the Armenian Genocide?  
 3 MR. BREY: Objection. Relevance.  
 4 A. Only what was in the brochure.  
 5 Q. Okay. Are you aware that Ronald Reagan has  
 6 referred to the events in Armenia of 1915 as a  
 7 genocide?  
 8 A. Only what was in his brochure.  
 9 Q. Okay. And you've made no attempt to verify  
 10 that those were accurate?  
 11 A. No.  
 12 Q. Okay. And it's your position that an -- an  
 13 event cannot be deemed to be a genocide unless there  
 14 has been a court finding that, in fact, it has -- it  
 15 was a genocide; is that right?  
 16 A. Well, I think you have to have a tribunal to  
 17 determine whether a genocide has occurred or not.  
 18 That's a very serious crime.  
 19 Q. Sure. And -- and -- and -- and from your own  
 20 perspective, unless there's been a final finding by a  
 21 tribunal of that, it's not genocide; is that correct?  
 22 A. The definition of "genocide" has in it that  
 23 it's government sponsored.  
 24 Q. So the fact that the -- the -- the fact that  
 25 you have not gotten to in the case of the -- events in

47

1 I think it was the last one, but one of them where I  
 2 asked her if Mr. Fein -- if his statement on Exhibit E  
 3 was an accurate or inaccurate recitation of her  
 4 position of the Armenian Genocide. And she gave a  
 5 longer answer than I had asked for. And that's the  
 6 question that I would like to have certified for the  
 7 record.  
 8 MR. BREY: Actually, I think he asked that  
 9 three times, so you might as well mark them all. I get  
 10 the feeling that he didn't like her answer.  
 11 BY MR. FINNEY:  
 12 Q. Are you aware of any statement that Pope John  
 13 Paul II has made about the Armenian Genocide?  
 14 MR. BREY: Objection. Relevancy.  
 15 Q. You can answer.  
 16 MR. BREY: You can answer if you want to.  
 17 A. Only in the context of what Mr. Krikorian  
 18 reported.  
 19 Q. Okay. So you've read his brochure in which  
 20 he quoted what Pope John Paul had to say about it?  
 21 A. Yes.  
 22 Q. Okay. Have you done any independent -- made  
 23 any independent effort to verify that?  
 24 A. No.  
 25 Q. Okay. Are you aware of the fact that Pope

49

1 -- in Turkey relating to the Armenians in 1915 is the  
 2 fact that you're not convinced it was government  
 3 sponsored. It's not that there hasn't been a final  
 4 finding by a tribunal that it was a genocide; is that  
 5 right?  
 6 A. Well, I think you have to have a tribunal to  
 7 really determine something of that nature.  
 8 Q. Okay. In -- attached to your complaint --  
 9 MR. FINNEY: Is this the one that was  
 10 attached to the complaint, Josh? And then the other  
 11 one is the one that they produced in discovery?  
 12 MR. BOLINGER: That's discovery. This is  
 13 discovery.  
 14 MR. FINNEY: Where is the one that was  
 15 attached to the complaint? Or is that attached to the  
 16 complaint? So we'll just ask her to look at the  
 17 complaint.  
 18 MR. BOLINGER: Right.  
 19 BY MR. FINNEY:  
 20 Q. Go ahead and look back at Exhibit C, please.  
 21 A. (Perusing document.)  
 22 Q. Attached to Exhibit C as an exhibit is a  
 23 Excel spreadsheet, Exhibit 4. Can you look at that,  
 24 please.  
 25 A. (Perusing document.) Whoever put those

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50

1 together -- Sorry, the numbers on this one are not in  
2 order.

3 Q. Okay. Can you tell us what Exhibit 4 is?  
4 It's interesting, in the complaint it really doesn't  
5 reference it, I don't think, so we couldn't tell from  
6 the complaint what Exhibit 4 is. Can you tell me what  
7 that is?

8 A. It looks like a contributions sheet.

9 Q. It sure does. What -- what are these  
10 contributions? What -- what would -- how would you  
11 describe what this is?

12 A. Well, not knowing where they came from, but  
13 Q. Well, let's --  
14 A. -- I would imagine these are contributions to  
15 me.

16 Q. Okay. Let's try it like this. Look at the  
17 fourth page of that document, if you would, the overall  
18 document, Exhibit C?

19 A. Okay.

20 Q. No.

21 A. It says Exhibit 3.

22 Q. No. I'm sorry. Mrs. Schmidt, the overall  
23 document is called Exhibit C.

24 A. Okay. You said the fourth page.

25 Q. Right.

52

1 A. Well, Exhibit 4 would be -- I have to go back  
2 and find it on this document.

3 MR. BREY: Tell him what you know. Your last  
4 response said, "I imagine." He doesn't want you to  
5 speculate.

6 A. Okay. Well, these would be contributions to  
7 my campaign.

8 Q. These are contributions to your campaign. Is  
9 this the total of all contributions to your campaign in  
10 a particular period of time, or is this --

11 A. Oh, no.

12 Q. -- is this a subset?

13 A. Yes.

14 Q. It's a subset.

15 A. Well, it's -- it's -- it's part of it, yes.

16 Q. Okay. That's good. Now, what subset is  
17 this? Somebody did a search or somebody produced some  
18 records that you attached to your affidavit. What  
19 information is that supposed to impart to the Ohio  
20 Elections Commission that you attached that to your  
21 affidavit?

22 A. I believe it's supposed to show who gave me  
23 money.

24 Q. Is that everybody who gave you money?

25 A. No.

51

1 A. Okay. I -- I flipped --  
2 Q. It's the complaint itself.  
3 A. One, two Krikorian's letter is three, and the  
4 rest of his letter is four so --  
5 MR. FINNEY: Somehow she doesn't have a full  
6 copy of it. Let me give you my copy.

7 A. Okay. I mean --  
8 Q. Why don't we try that one? I'm sorry.  
9 A. One, two, three -- okay, four.  
10 Q. Okay. And on that fourth page is -- this is  
11 an affidavit, a sworn statement under oath from you,  
12 right?

13 A. Mm-hmm.

14 Q. And you submitted this as evidence to the  
15 Ohio Elections Commission?

16 A. Yes.

17 Q. Okay. And attached to your document, that  
18 you tendered to the Elections Commission, is this list  
19 which is Exhibit 4, which you can now turn to.

20 A. Okay. Now that I have a complete document, I  
21 have a better understanding of where you got those  
22 numbers, but the document you gave me before was an  
23 incomplete document.

24 Q. Okay. Good. Now, tell me what Exhibit 4 is  
25 then?

53

1 Q. Okay. Then it's some of the people who gave  
2 you money.

3 A. Yes.

4 Q. And it excludes other people who did give you  
5 money?

6 A. Yes.

7 Q. Okay. And my question is -- I know this is  
8 hard, but I'm trying to understand how it is that you  
9 selected these names of people who did give you money  
10 and excluded the names of other people who did not give  
11 you money?

12 MR. BREY: I would object. The question  
13 assumes facts not in evidence. You're assuming that  
14 Jean Schmidt selected these names, and there's been no  
15 testimony that she selected them or even those who did  
16 or why.

17 BY MR. FINNEY:  
18 Q. Well, you've said that this is a subset of  
19 the whole of your database for fundraising; is that  
20 correct?

21 A. Yes.

22 Q. Okay. And what subset does this represent?

23 A. Since I didn't compile it, I can't tell you.

24 Q. But you attached it to your sworn affidavit  
25 swearing it was something. I presume it --

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**VERIFICATION**

I, Fred Bleakley, swear and affirm that the information given in the Responses and Objections of Plaintiff, Fred Bleakley, to Defendants' Interrogatories and Requests for Production of Documents is true and correct, to the best of my knowledge.

\_\_\_\_\_  
Fred Bleakley

Sworn to before me and subscribed in my presence on this \_\_\_ day of September 2009.

\_\_\_\_\_  
Notary Public

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1 MR. BREY: I'm -- I'm --  
 2 Q. -- was accurate information. And I'm asking  
 3 you what -- what it represents? What information is  
 4 the Ohio Elections Commission supposed to divine from  
 5 that document?  
 6 MR. BREY: Objection. You assume that she --  
 7 you stated in your question that she referenced it in  
 8 her affidavit. That assumes facts not in evidence.  
 9 And you've also assumed that she -- in your question,  
 10 that she personally chose to include this. Neither of  
 11 those -- those statements has -- is a matter of record.  
 12 BY MR. FINNEY:  
 13 Q. Okay. Well, let's try it like this. Why  
 14 don't you look at Exhibit C? Just look at the whole  
 15 thing --  
 16 A. Okay.  
 17 Q. -- because I might have misassembled it.  
 18 It's possible.  
 19 A. Okay.  
 20 Q. Take your time. Look at the Exhibit C.  
 21 My question is: Was Exhibit 4, in fact, attached  
 22 to Exhibit C when you signed it?  
 23 A. Yes.  
 24 Q. It was. Okay. So you signed that affidavit  
 25 -- I'm sorry -- Exhibit -- Exhibit 4 -- you attached

1 do take the advice of legal counsel in preparing  
 2 documents.  
 3 (CERTIFIED QUESTION)  
 4 Q. And I don't want to violate your  
 5 attorney/client privilege, okay? I don't want you to  
 6 tell me what your attorney told me -- told you.  
 7 I want you to tell me what you intended by  
 8 attaching this as Exhibit 4 to your affidavit with the  
 9 Ohio Elections Commission?  
 10 A. Again, sir, that would be attorney/client  
 11 privilege and --  
 12 Q. No. It's actually not.  
 13 A. Well, sir --  
 14 Q. But your attorney would have to raise that as  
 15 an objection. My question is --  
 16 MR. BREY: What -- what --  
 17 (CERTIFIED QUESTION)  
 18 Q. -- this was attached to your affidavit. What  
 19 -- what are we -- what does this list constitute, or  
 20 what are you trying to tell the Elections Commission  
 21 with this information?  
 22 MR. BREY: Well, first of all, I would  
 23 object. You made a false statement of law. The  
 24 privilege belongs to -- to -- to the client, not to the  
 25 lawyer. And either the lawyer or the client can raise

1 Exhibit 4 to that affidavit, right?  
 2 A. Yes.  
 3 Q. And by -- and then you -- you, or someone on  
 4 your behalf, had that filed with the Ohio Elections  
 5 Commission?  
 6 A. Yes.  
 7 Q. Okay. And why did you include that two-page  
 8 listing of names and contributions and addresses in  
 9 your filing with the Ohio Elections Commission?  
 10 A. Well, I think that would be part of what my  
 11 attorney put together.  
 12 Q. I see. And did you read the affidavit and  
 13 the exhibits before you signed them?  
 14 A. Yes.  
 15 Q. Okay. So you had an understanding of the  
 16 information that you were trying to impart to the Ohio  
 17 Elections Commission at the time you -- you signed it,  
 18 right?  
 19 A. Yes.  
 20 (CERTIFIED QUESTION)  
 21 Q. Okay. And what was that information that you  
 22 were trying to impart to the Ohio Elections Commission  
 23 by attaching Exhibit 4?  
 24 A. One of the opportunities all Americans have  
 25 is to have legal counsel. Since I'm not an attorney, I

1 attorney/client privilege.  
 2 I didn't object because I didn't know if  
 3 perhaps she had an intent that was unrelated to  
 4 conversations we had with counsel. If she had an  
 5 intent that's unrelated to communication with counsel,  
 6 she can tell you. If she doesn't she can tell you that.  
 7 BY MR. FINNEY:  
 8 Q. So you're refusing to answer the question; is  
 9 that my -- based upon attorney/client privilege. Is  
 10 that my understanding?  
 11 A. Yes.  
 12 MR. FINNEY: Thank you. Will you certify  
 13 that question? And will you have that on our list when  
 14 you talk to Mr. Richter? Thank you.  
 15 MR. HARTMAN: Can we make sure the exhibit is  
 16 marked correctly since you exchanged exhibits? I want  
 17 to make sure --  
 18 MR. BREY: Yeah. We can give this -- make it  
 19 real easy.  
 20 MR. HARTMAN: I just don't want the one Mr.  
 21 Finney now has to be part of the record as opposed to  
 22 the one Ms. Schmidt has.  
 23 MR. BREY: We're okay with that.  
 24 BY MR. FINNEY:  
 25 Q. Okay. Now, you -- who -- tell me about your

110051001



58

1 fundraising operation. Who runs your campaign,  
 2 generally? Who's your campaign manager, or who's in  
 3 charge of running your political campaigns, let's say  
 4 in the 2007/2008 election cycle?  
 5 A. Who ran the campaign in 2007/2008?  
 6 Q. Uh-huh. Or for benefit of the court  
 7 reporter, "yes." I know it's a hard question.  
 8 A. Well, I had a number of people working with  
 9 me.  
 10 Q. You did? Okay. Well, just tell me all of  
 11 them then.  
 12 A. Well, my husband at the time was the  
 13 treasurer.  
 14 Q. I didn't ask about the treasurer; I asked you  
 15 who ran the campaign and who was your manager?  
 16 A. Okay.  
 17 MR. BREY: Well, actually, the last question  
 18 was she had a number people working with her, and I  
 19 thought you asked who they were.  
 20 BY MR. FINNEY:  
 21 Q. Okay. Go ahead.  
 22 A. My chief of staff, which by law, is allowed  
 23 to work on the campaign.  
 24 Q. That would be Barry Bennett?  
 25 A. That would be Barry Bennett. And then I had

60

1 people who had management functions --  
 2 A. Well, Barry Bennett would have been the one  
 3 that would have been in charge of my campaign in 2007  
 4 and 2008.  
 5 Q. Okay. Thank you. And then did you have  
 6 someone who helped out on fundraising or was in charge  
 7 of fundraising?  
 8 A. Yes.  
 9 Q. Okay. And who was that person?  
 10 A. I wish I could remember.  
 11 Q. Was it a man or a woman?  
 12 A. A woman.  
 13 Q. And you have no idea who that is?  
 14 A. I can't remember her name.  
 15 Q. Okay. How long did she work on your  
 16 campaign?  
 17 A. About six months.  
 18 Q. Was she young or old?  
 19 A. 30s -- 30-ish.  
 20 Q. Tall or short?  
 21 A. About five-five.  
 22 Q. Fat or skinny?  
 23 A. Skinny.  
 24 Q. Blond, brunette, or redhead?  
 25 A. Brunette.

59

1 interns.  
 2 Q. Interns. Do they have names?  
 3 A. Yeah. But I don't remember them.  
 4 Q. Okay. Who else?  
 5 A. Some of which have come onboard my campaign  
 6 that I do remember, some of which have gone back to  
 7 college.  
 8 Q. I'm sorry. I'm not asking about your  
 9 congressional office functions; I'm asking about your  
 10 campaign functions.  
 11 A. No.  
 12 Q. You're saying --  
 13 A. No. So -- so --  
 14 Q. Let me finish the question. Interns in your  
 15 congressional office helped run your campaign?  
 16 A. No.  
 17 Q. Okay. I want to know who helped run your  
 18 campaign.  
 19 A. There are two different kinds of interns.  
 20 You can have interns that work on a campaign. You can  
 21 have interns that work in a congressional office. You  
 22 can have interns that work on a campaign that end up  
 23 working in your congressional office.  
 24 Q. I'm asking you everybody who -- I really want  
 25 to know who ran your campaign. You -- you were telling

61

1 Q. Thank you. Now, who is Phil Greenberg?  
 2 A. Phil Greenberg is my current campaign  
 3 fundraiser.  
 4 Q. Okay. And did he have any role in your  
 5 campaign in the years 2007 and 2008?  
 6 A. I'm trying to think when Phil came onboard.  
 7 It's when I got -- when -- when the other person went a  
 8 different direction.  
 9 MR. BREY: Can we take --  
 10 A. I don't remember when Phil came onboard, to  
 11 be honest with you.  
 12 MR. BREY: Can we take a two-minute break?  
 13 Both my pens are running out.  
 14 MR. FINNEY: Sure.  
 15 THE VIDEOGRAPHER: Please stand by.  
 16 (OFF THE RECORD)  
 17 THE VIDEOGRAPHER: We're now back on the  
 18 video record.  
 19 BY MR. FINNEY:  
 20 Q. Mrs. Schmidt, when we broke, I was asking you  
 21 about who Phil Greenberg is.  
 22 A. Right. And I -- when you asked the first  
 23 question regarding campaigns, I had to go back. Having  
 24 six campaigns in three years, there is a lot of  
 25 activity.

UNRECORDED

1 I believe Phil Greenberg came onboard in 2007  
2 after the other individual left to pursue other  
3 interests.

4 Q. Okay. And what was Phil Greenberg's job with  
5 your campaign?

6 A. To raise money.

7 Q. Okay. And to whom did he report in that  
8 activity?

9 A. Well, in -- to my husband, the treasurer.  
10 (EXHIBIT F MARKED FOR IDENTIFICATION)

11 Q. He reports to the treasurer. Okay.

12 And -- at some -- well, let me go ahead and  
13 show you. Exhibit F, I think, is the documents that  
14 you--all produced in response to the subpoena -- I'm  
15 sorry, to the notice of deposition that we provided and  
16 I think some third-party subpoenas, too, both to the  
17 congressional office and the campaign office.

18 If you want to take a minute to look through  
19 that, you can, but I think this is --

20 MR. FINNEY: Is the full production of  
21 everything that they gave us?

22 MR. BOLINGER: That should be, yes, with the  
23 exception of what came today from Don that I just gave  
24 you.

25 BY MR. FINNEY:

1 transpired? When was your first contact, either with  
2 you or with your campaign or with your congressional  
3 office, of representatives advancing interests relating  
4 to Turkey?

5 A. Relating to Turkey? Well, there have been  
6 occasions where people have come in regarding the  
7 Turkish-American interest in the War on Terror. And I  
8 became aware of that soon after I got elected to  
9 Congress.

10 Some of that was with folks that came into  
11 the office. Some of that is sensitive information that  
12 members of Congress are given regarding activities on  
13 the War on Terror.

14 Q. You mean briefings from the Defense  
15 Department or the State Department?

16 A. That could be included, yes.

17 Q. Okay. Well, I'm not asking about any of  
18 that. I'm asking about lobbyists or citizens that have  
19 -- or -- or even foreign individuals who have  
20 approached you about Turkey's interests of -- of  
21 matters before the United States Congress.

22 A. I -- I don't remember when those first  
23 occurred.

24 Q. Okay. But at some point in time, someone  
25 contacted you about offering to raise money because you

1 Q. So other -- other than what we received  
2 today, this is everything that -- at least, we believe  
3 was to be everything you produced in the response to  
4 the notices of deposition and subpoenas that we  
5 provided.

6 MR. BREY: Has this been marked as an  
7 exhibit?

8 MR. FINNEY: It is. It's Exhibit -- what  
9 does that say on the front, Mrs. Schmidt, "F"?

10 THE WITNESS: "F." Yes.

11 BY MR. FINNEY: --

12 Q. Now, first of all, can you just confirm that  
13 that's everything that you produced in response to  
14 these requests for production and subpoenas?

15 MR. BREY: Objection. Other than what we  
16 produced this morning.

17 Q. Other than what you produced this morning,  
18 right?

19 A. Yes.

20 Q. Okay. Now, at some point in time in 2007 or  
21 2008, you developed contacts within the Turkish -- or  
22 Turkish-American communities that raised some funds for  
23 you, is that right?

24 A. Yes.

25 Q. Okay. And why don't you tell us how that

1 were supportive of interests that Turkish Americans  
2 were interested in; is that right?

3 A. Nobody ever came to me, no.

4 Q. And how about your campaign?

5 A. You'd have to ask Mr. Greenberg.

6 Q. Okay. Do you have any Turkish friends?

7 A. Turkish friends?

8 Q. Who had a fundraiser for you?

9 A. I've had Turkish fundraisers, yes.

10 Q. You had -- why don't you -- let's just talk  
11 about those. What -- what were your Turkish  
12 fundraisers?

13 A. Well, there was one at the Cafe Istanbul.

14 Q. Okay. And -- and how was that event  
15 developed? Did somebody contact you or your campaign  
16 about that? Or did you contact them? How did that  
17 emerge?

18 A. Well, you would have to ask Mr. Greenberg.  
19 It emerged on my calendar and I went.

20 Q. So until Mr. Greenberg called you and said  
21 this event was going to occur or until he put it on  
22 your calendar, you didn't know anything about it?

23 A. Correct.

24 Q. Okay. Why don't you just tell me, generally,  
25 how your campaign works then in terms of strategy, in

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1 terms of execution. Did you, at some point, learn that  
 2 this event was -- well, not this event, but just in  
 3 general, do you strategize and say, Let's go after this  
 4 donor or these sets of donors? Or does your campaign  
 5 just handle everything?  
 6 A. They handle pretty much everything.  
 7 Q. So you weren't involved at all in the  
 8 fundraising components of the campaign?  
 9 A. Well, you're always involved. I mean, I  
 10 don't know what you mean by that question.  
 11 Q. Well, let's just say before the solicitations  
 12 are made. Before the solicitation are made, you -- you  
 13 have no involvement in that -- in developing the lists  
 14 of who we're going to call for money or have  
 15 fundraisers with? You're not involved in any of that?  
 16 A. The lists come from Phil; he generates the  
 17 lists. And then --  
 18 Q. Of -- of prospective donors?  
 19 A. Yes.  
 20 Q. Okay. Go ahead.  
 21 A. And then depending upon what he wants me to  
 22 do with them, I either make a call asking for a  
 23 donation -- or not a donation -- a contribution, or to  
 24 attend a fundraiser.  
 25 Q. Okay. And that's the limit of your

1 A. Yes.  
 2 Q. And why would you pay him as his company  
 3 instead of him individually?  
 4 A. You'd have to ask Mr. Greenberg why that was  
 5 set up that way.  
 6 Q. Okay. And you -- did you mention to Mr.  
 7 Greenberg that you would be able to raise money from  
 8 Turkish interests, or was that something that he  
 9 decided was a fundraising opportunity?  
 10 A. It was something he decided was a fundraising  
 11 opportunity.  
 12 Q. And how did he develop that notion?  
 13 A. You're going to have to ask Mr. Greenberg.  
 14 Q. Okay. And the Turkish event at Cafe Istanbul  
 15 you're talking about was in February of 2008; is that  
 16 right?  
 17 A. I don't remember the date.  
 18 Q. Okay. Go ahead and turn to what is about the  
 19 sixth page of Exhibit F that I've given you.  
 20 A. (Perusing document.)  
 21 MR. BREY: I hate to interject, but did we  
 22 ever get a copy of the Use Agreement back because we  
 23 need that.  
 24 MR. FINNEY: Well, I signed it and handed it  
 25 to you.

1 involvement with strategy and direction for the  
 2 campaign in terms of fundraising?  
 3 A. Yes.  
 4 Q. Okay. And that was true in all of 2007 and  
 5 2008?  
 6 A. Since Phil's been onboard, yes.  
 7 Q. Okay. And he joined when?  
 8 A. I -- I don't know the exact date.  
 9 Q. Who -- who is Mr. Greenberg? Who does he  
 10 work for? Does he work for the congressional office?  
 11 Does he work for the campaign? Does he work for --  
 12 A. He only works for the campaign.  
 13 Q. He works for the campaign, and he's paid for  
 14 by the campaign?  
 15 A. Yes.  
 16 Q. Directly or through some company?  
 17 A. Through a company.  
 18 Q. What's his company name?  
 19 A. I'm not sure; I don't handle the checks.  
 20 Q. Okay. So does he work out of the campaign  
 21 office, or does he work out of an office in DC where he  
 22 just does --  
 23 A. No. He works out of the campaign office or  
 24 the -- or his office in Columbus.  
 25 Q. He has an office in Columbus?

1 MR. BREY: Did you?  
 2 MR. FINNEY: I told you I wanted a copy back  
 3 from you.  
 4 MR. BREY: I think you did.  
 5 MR. BOLINGER: I didn't see it. They have a  
 6 Xerox machine at the front desk. I can make copies.  
 7 MR. BREY: I'm sorry. If I've got it, I'll  
 8 find it.  
 9 MR. FINNEY: I signed it promptly and handed  
 10 it to you. I'd like it if you'd lose it, but --  
 11 MR. BREY: I understand.  
 12 THE WITNESS: Turkish lunch.  
 13 BY MR. FINNEY:  
 14 Q. Yeah. This is sent to -- I guess, from Phil  
 15 Greenberg, even though it doesn't have a "From" line.  
 16 It's signed, sort of, by him at the bottom. Do you see  
 17 that?  
 18 A. Uh-huh.  
 19 Q. And it looks like -- the disclaimer at the  
 20 bottom is a "Schmidt for Congress" disclaimer. So that  
 21 -- what happens is he sends it, and it looks like it's  
 22 -- even though he's with another company, it looks like  
 23 it's from Schmidt for Congress and then he sends an E-  
 24 mail; is that right?  
 25 A. You'd have to ask him why he sent it that

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70

1 way.

2 Q. Well, I wasn't asking why he sent it that

3 way, I'm just asking if this particular E-mail was, in

4 fact, sent that way because it has no "From" line on

5 it. I'm just trying to understand that.

6 A. Well, this is an E-mail that was sent.

7 Q. From Phil Greenberg as if it were from

8 Schmidt for Congress, as opposed to being from his

9 company?

10 A. That's what the document says, yes.

11 Q. And then it's -- and then it's sent to

12 schmidtforcongress@fuse.net. Do you see that?

13 A. Yes.

14 Q. Who -- who is the -- who -- who gets the E-

15 mails when they're sent to schmidtforcongress@fuse.net?

16 A. I have no idea.

17 Q. Do you ever open them up and look at them

18 when they're sent to schmidtforcongress@fuse.net?

19 A. No.

20 Q. Okay. And you have no idea in your operation

21 who'd -- who would do that?

22 A. No. It depends upon the time of the year.

23 Q. So different people might open that up.

24 That's not, like, targeted to Barry Bennett or to your

25 husband or anything else specifically?

72

1 the fundraiser for us," but on the production there was

2 nothing attached. Do you know if there was something

3 attached to this E-mail?

4 A. No.

5 MR. FINNEY: Don, do you know?

6 MR. BREY: I don't know.

7 MR. FINNEY: Okay. Well, I would like you to

8 follow up and get me that you if you wouldn't mind.

9 MR. BREY: Well, I -- I've -- I've been told

10 that this is all we have.

11 MR. FINNEY: Well --

12 MR. BREY: The attachments aren't kept. But

13 you -- you can -- you can interview Barry Bennett about

14 that when you depose him.

15 MR. FINNEY: Is that the recipient of the E-

16 mail?

17 MR. BREY: No. That's -- I'm sorry. Are you

18 asking her or are you asking me?

19 MR. FINNEY: I'm asking you.

20 MR. BREY: No. I think Barry Bennett was the

21 one who -- who -- who pulled the documents.

22 BY MR. FINNEY:

23 Q. And then when he refers to "Info about our

24 Turkish friends sent to Schmidt for Congress," who are

25 -- who are your "Turkish friends"?

71

1 A. I don't know.

2 Q. Okay. And in this E-mail, Mr. Greenberg says

3 "Info about our Turkish friends and who is associated

4 with the people having the fundraiser for us. Please

5 feel -- feel free to pass on to J.S."

6 Do you know who "J.S." is?

7 A. Where are you getting that? "Turkish

8 fundraiser -- Turkish-American fundraiser for

9 Congresswoman Schmidt will be at the Turkish

10 restaurant, date" --

11 Q. We're on the wrong E-mail.

12 A. Oh, okay.

13 Q. This is an E-mail dated --

14 A. Well, you said page 8.

15 Q. I didn't say page 8; I said page 6, actually.

16 A. Oh, page 6. I'm on the wrong page. One,

17 two, three, four, five. Okay. Wrong page, sorry. I

18 thought you said page 8.

19 Q. Okay. Have you seen this E-mail previously?

20 A. No.

21 Q. Who is "J.S."?

22 A. I would assume it's me.

23 Q. Okay. And then this seemed to imply that

24 there was something attached, "Info about our Turkish

25 friends and who was associated with the people having

73

1 A. I don't know.

2 Q. Okay. And then on February the 14th -- this

3 is addressed to the same address, schmidtfor --

4 A. Oh, where -- what page is that?

5 Q. This is the next page.

6 A. Okay.

7 Q. I'm sorry. See where it says "Turkish

8 contributions online"?

9 A. Uh-huh.

10 Q. And this one is also addressed to

11 schmidtforcongress@fuse.net and copied to

12 lincolnmccurdy@fuse -- @USA.net.

13 Do you see that up at the top --

14 the header?

15 A. Oh, yeah.

16 Q. Okay. And this one says: "Hi Peter, please

17 note that" -- and Peter, that would be your husband; is

18 that right?

19 A. Yes.

20 Q. Okay. "Please note that you may be receiving

21 some web contributions from Turkish-sounding

22 individuals in connection with our Turkish-council

23 event to be held this Monday. Please let Lincoln know

24 these individuals who contribute to this site for

25 tracking purposes."

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**VERIFICATION**

I, Kenneth Bleakley, swear and affirm that the information given in the Responses and Objections of Plaintiff, Kenneth Bleakley, to Defendants' Interrogatories and Requests for Production of Documents is true and correct, to the best of my knowledge.

\_\_\_\_\_  
Kenneth Bleakley

Sworn to before me and subscribed in my presence on this \_\_\_\_ day of September 2009.

\_\_\_\_\_  
Notary Public

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1 So Phil Greenberg, in this case, was  
 2 referring to Peter -- that looks like Peter, at least  
 3 in some cases, opens up these E-mails; is that right?  
 4 A. I would assume so.  
 5 Q. Okay. And do you know what he -- what he's  
 6 referring to when he says "Turkish-sounding  
 7 individuals"?  
 8 A. No.  
 9 Q. What is a "Turkish-sounding individual"?  
 10 A. Don't know.  
 11 Q. Okay. And then he refers to the "Turkish-  
 12 council event." What is the "Turkish-council"?  
 13 A. I don't know.  
 14 Q. Okay. But this sound like some formal group.  
 15 It wasn't just a -- an ad hoc group of individuals who  
 16 got together, but a formal thing called the Turkish-  
 17 council.  
 18 Could you tell us what that is?  
 19 A. I don't know what it is.  
 20 Q. Okay. Do you know if it's affiliated with  
 21 the Turkish government?  
 22 A. No. It's not affiliated with the Turkish  
 23 government.  
 24 Q. Now, you didn't know anything about it until  
 25 I asked you that question, then you were absolutely

1 A. I don't know what the Turkish-council event  
 2 is.  
 3 MR. FINNEY: Is that Mark again?  
 4 MR. KRICKORIAN: Is that Mark?  
 5 MR. RICHTER: No. It's Phil Richter.  
 6 MR. KRICKORIAN: Oh.  
 7 MR BREY: Hi Phil.  
 8 MR. RICHTER: At least you guys went a while  
 9 before you called me.  
 10 MR. FINNEY: Oh, I don't think it was that  
 11 long; we've been waiting for you. Phil, we have two  
 12 questions at this point that Mrs. Schmidt is refusing  
 13 to answer.  
 14 MR. BREY: Actually, that's not true. She's  
 15 answered them; he doesn't like her answers. He wants  
 16 her to answer them differently.  
 17 MR. FINNEY: Well, actually, one she refused  
 18 to answer; she claimed attorney/client privilege over.  
 19 MR. BREY: That's true.  
 20 MR. FINNEY: We'll deal with that one first,  
 21 I guess.  
 22 The first one is attached to her complaint,  
 23 her affidavit -- Sworn Statement of Mrs. Schmidt, as  
 24 Exhibit -- as Exhibit 4 -- is a spreadsheet.  
 25 MR. PHIL: Okay.

1 certain that it wasn't affiliated with the Turkish  
 2 government.  
 3 How did you know that so instantly?  
 4 MR. BREY: I believe you've mischaracterized  
 5 her testimony, but you can answer.  
 6 A. I don't know who the Turkish-council is, but  
 7 it's not the Turkish government.  
 8 Q. Well, how do you know that if you don't know  
 9 who it is?  
 10 A. Because the Turkish government is not the  
 11 Turkish-council.  
 12 Q. Okay. But do you know if the Turkish-council  
 13 is affiliated with, sponsored by, or involved with the  
 14 Turkish government?  
 15 A. With the Turkish -- well, it says "Turkish-  
 16 council event," so I don't know what that means.  
 17 Q. You don't know. So it -- for all you know,  
 18 it may be associated with the Turkish government.  
 19 A. I don't know what the term "Turkish-council  
 20 event" is. Is that a real term, or is that a term that  
 21 somebody shortens to talk about something else that you  
 22 and I may not have any knowledge of.  
 23 Q. Right. And sitting here today, you don't  
 24 know one way or the other if that's associated in any  
 25 way with the Turkish government?

1 MR. FINNEY: Of -- of she says it's of some  
 2 subset of her contributor list. But then I ask her  
 3 other questions about that, what, in fact, subset is  
 4 that, and why did she attach it, and what information  
 5 is she trying to impart to the Commission with that,  
 6 she refused to answer citing attorney/client privilege.  
 7 MR. BREY: No. Actually, that's not true.  
 8 What she refused to answer is only the last question  
 9 about what was your intent of -- of including this,  
 10 since it's not referenced in your affidavit. It is  
 11 attached to her complaint.  
 12 She answered the question saying that it was  
 13 attached. She answered the question saying it was  
 14 attached to her affidavit when she signed it.  
 15 When he was saying, "Why was this attached to  
 16 the affidavit? What was your intent," she -- she  
 17 indicated that she follows advice of counsel and that  
 18 it -- and claimed attorney/client privilege.  
 19 And I told her that if you have an intent --  
 20 intent apart from communication she had with counsel,  
 21 she can tell him that. But if -- if -- if it's only  
 22 based upon communications with counsel, she doesn't  
 23 have to tell him that. And that's the basis of the  
 24 attorney/client privilege claim.  
 25 MR. FINNEY: Why -- why don't you go ahead

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1 and read the questions back. Hold on. I'm going to  
2 have the court reporter --

3 MR. RICHTER: Well, hold on. Hold on. The  
4 attorney/client privilege, though, is hers to -- to  
5 either grant or give up. And if she's attaching that  
6 to a public document, there must a basis for doing so  
7 that she has an understanding of -- awareness of.

8 And, I mean, why would you attach something  
9 like that that she knows is going to be scrutinized in  
10 a public environment and -- and not be willing to  
11 discuss the basis for including it?

12 MR. BREY: Well, that -- that's a good  
13 question.

14 MR. FINNEY: Yeah. Well --

15 MR. BREY: But -- but the fact -- fact of the  
16 matter is that that's also true. Why would you file a  
17 complaint and not -- and -- and -- still be able to  
18 claim the attorney/client privilege as to your  
19 strategy. Why did you file this complaint, you know,  
20 what is the purpose of it?

21 You didn't ask what the document means. And  
22 her answer was, as far as I know, this is what it looks  
23 like, but she doesn't know what it is. You know, in  
24 terms of intent, what was your intent in filing this in  
25 front of the --

1 was a screw-up on your part and there was no intent, I  
2 don't know how attorney/client privilege has anything  
3 to do with that. Just say, Hey my attorney screwed up.  
4 Sorry for your luck there, Don.

5 MR. BREY: Well, what I've told her, she  
6 could say what her intent was. She can't say what my  
7 intent was or what her lawyer's intent was.

8 MR. FINNEY: I didn't ask for your intent. I  
9 asked her to tell me why she gave that information to  
10 the Commission and what she intended to impart to them  
11 by doing that. If the answer is, I don't know, that's  
12 a perfectly acceptable answer.

13 MR. BREY: Do you know?

14 MR. RICHTER: I --

15 THE WITNESS: I don't know.

16 MR. RICHTER: I would tend to agree. Great.

17 MR. BREY: Well, I think we got her answer.

18 So she -- she can say, "I don't know" to that, and  
19 we'll move on, right? You can go the record.

20 MR. FINNEY: Well, we've been on the record.  
21 But that's fine. We'll ask -- we'll ask it later.

22 And then my other question deals with her  
23 denial of the Genocide. And she tells me her position  
24 on that about 12 times like she'd memorized it.

25 And then I read to her from a TCA, that's

1 You know, I never referred to it in any of  
2 the Commission arguments I had. It was there; it's not  
3 attached to any affidavit; it's not referred to in her  
4 affidavit; it is an exhibit that is attached. And  
5 frankly, the reality is it was attached because I  
6 screwed up in terms of not taking it out because nobody  
7 referenced it.

8 You know, the -- the -- but in -- in terms of  
9 -- of the intent she had, you know, I don't know what --  
10 -- that she had an intent other than this -- this is how  
11 the pack was presented to her.

12 Mr. Richter: Chris?

13 MR. FINNEY: Phil, I mean, again, the  
14 attorney/client privilege deals with her communications  
15 with her attorney. I've not asked her anything -- in  
16 fact, I told her, I don't want to know your  
17 communications with your attorney. I what to know why  
18 you attached this document, and what information you  
19 intended to impart to the Commission by attaching it.

20 If she doesn't know, then she simply needs to  
21 say "I don't know." Rather than doing that she said, I  
22 declare the attorney/client privilege.

23 MR. RICHTER: Yeah. I mean, unless you tell  
24 me something else, Don, I mean, if she's going to  
25 include that and it was a quote -- you know, even if it

1 "Turkish Coalition of America" position paper dated  
2 November the 4th, 2008. And in that -- apparently,  
3 we've established that this was written by Mr. Fein,  
4 her attorney.

5 And Mr. Fein says and I quote, "Congresswoman  
6 Schmidt" and then dot dot dot, "does not believe the  
7 tragic events of World War I in which both Armenians  
8 and Turks were killed in harrowing numbers constitute  
9 genocide."

10 So we read her that statement, and the  
11 question that

12 I asked her is: Does that or does that not  
13 accurately reflect your position on the Armenian  
14 Genocide? And she refused to answer. Instead, what  
15 she did was she kept reciting back to me this idea  
16 that, Well, gee, I don't know enough about it and so  
17 on.

18 And I simply asked her to answer the question  
19 whether or not this accurately reflects her position.  
20 It's a "yes" or "no" question I would like her to  
21 answer.

22 MR. BREY: Well, she answered the question.

23 Actually, you probably ought to read back the  
24 transcript --

25 MR. FINNEY: Go ahead.

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82

1 MR. BREY: -- so you can have a sense of what  
 2 was going on. The question was asked several times,  
 3 and I let it go for a while.  
 4 MR. FINNEY: We'll let the court reporter  
 5 read it to you, Phil.  
 6 COURT REPORTER: Give me just a minute,  
 7 please.  
 8 MR. RICHTER: Well -- well, hold on with the  
 9 court reporter -- I -- just because if -- if I'm  
 10 understanding, it was -- what you were reading, Chris,  
 11 was Fein -- presumably Fein's representation of her  
 12 position --  
 13 MR. FINNEY: Correct.  
 14 MR. RICHTER: -- is that correct?  
 15 MR. FINNEY: That is correct. I can read you  
 16 the whole paragraph if you'd like.  
 17 MR. BREY: It was Fein's representation of  
 18 her position in -- in a November 2008 paper. This is  
 19 obviously before he was counsel for her. And, you  
 20 know, she -- he asked about it and she says: Well,  
 21 those are Bruce Fein's statements.  
 22 And he's saying: Well, is -- is -- is this an  
 23 accurate representation of your -- your position?  
 24 And she stated what her position was. Now,  
 25 the problem with the "yes" or "no" answer to this

84

1 MR. FINNEY: Phil.  
 2 MR. RICHTER: Go ahead.  
 3 MR. FINNEY: He's kind of raising two  
 4 different issues; one is relevance, which I can get to.  
 5 But just as an evidentiary matter, I simply asked her,  
 6 was it an accurate reflection of her position or not.  
 7 I didn't write it; Mr. Fein, her attorney, did. I know  
 8 --  
 9 MR. BREY: No. Mr. Fein wrote it before he  
 10 was her attorney.  
 11 MR. FINNEY: He was --  
 12 MR. BREY: Not Mr. Fein, her attorney.  
 13 MR. FINNEY: Well, okay. Mr. Fein wrote it  
 14 before he was her attorney, but her attorney, Mr. Fein,  
 15 is the author of this document.  
 16 And I just asked: Does that or does that not  
 17 reflect your position? It's a very simple question and  
 18 she refuses to answer.  
 19 Now, as a matter of relevance, if you want me  
 20 to get into that, I can. Do you want me to do that,  
 21 Phil?  
 22 MR. RICHTER: Not right at the moment only because  
 23 isn't it -- isn't the only thing that she could  
 24 effectively answer, that it is a -- it is Bruce Fein's  
 25 representation of her position? Isn't that a "yes" or

83

1 question, Phil, is one that we've identified in our  
 2 motion to voluntarily withdraw some of the claims.  
 3 And by the way, what he's talking about is  
 4 utterly irrelevant to any of the claims that are still  
 5 pending, but I let it go on because he's wasting his  
 6 own time.  
 7 But what Bruce Fein wrote was that she does  
 8 not believe the tragic events of World War I constitute  
 9 genocide. And "does not believe" can either mean  
 10 denies, or it can mean does not have sufficient  
 11 information to say if it was true or false. And  
 12 therefore, a "yes" or "no" answer to that question, "Is  
 13 this accurate or inaccurate," would be a misleading and  
 14 a dishonest answer.  
 15 What she said repeatedly, because he kept  
 16 asking the same questions and was upset that she kept  
 17 giving the same answer, apparently, is that her  
 18 position was that she doesn't have enough information  
 19 to make a judgment that it was or that it was not.  
 20 That's consistent with, in one interpretation. I  
 21 suppose you could also interpret it to be inconsistent  
 22 with it.  
 23 But we've laid those -- that statement and  
 24 others were referenced in our motion to withdraw for  
 25 that -- exactly that reason.

85

1 "no" question she can answer?  
 2 MR. FINNEY: Oh, that's fine.  
 3 MR. BREY: That's not what the question was.  
 4 MR. FINNEY: But it wasn't written as her  
 5 attorney at that time, but that's fine. I can -- I can  
 6 --  
 7 MR. BREY: Well --  
 8 MR. FINNEY: -- is it a -- is it a -- but the  
 9 question is: Does it reflect your position or not?  
 10 That's an entirely appropriate question, and one that  
 11 she needs to answer. It's going to be extremely  
 12 probative for the Commission.  
 13 MR. BREY: We didn't object to the question,  
 14 and she answered the question. He didn't like the way  
 15 she answered it. He wants her to say "yes" or "no."  
 16 It's a question like, Did you stop beating your  
 17 wife? Because it is inconsistent under one  
 18 interpretation, and it is consistent under another  
 19 interpretation. So to demand that she answer "yes" or  
 20 "no" to: Is this consistent with your statement, or  
 21 does it represent your statement, depends upon the  
 22 interpretation of it.  
 23 She responded by saying: This is my position.  
 24 I'm not Bruce Fein. Those are his words, not mine.  
 25 And that, I believe, is a proper and

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1 responsive response to the question that he's asked at  
 2 least three times. And he didn't like her answer, so he  
 3 thought he'd have you force her to say "yes" or "no" to  
 4 a question that does not admit of a "yes" or "no"  
 5 answer because it depends on how you interpret Bruca.  
 6 Fein's statement, which wasn't hers.

7 MR. HARTMAN: Phil, this is Curt Hartman. I  
 8 don't think that's quite accurate. Her response was,  
 9 she doesn't have enough information to be in this -- in  
 10 this -- the repetitive statement she keeps making.

11 Mr. Fein makes a statement as to what her  
 12 position is. She should be able to say "yes" or "no,"  
 13 that does accurately reflect my position. If the  
 14 answer is no, that's fine. If the answer is yes,  
 15 that's fine. But all she says is, I don't have enough  
 16 information to know. Is that a "yes" or a "no"?

17 MR. BREY: Mr. Fein's statement is that the  
 18 Congresswoman Schmidt, based upon her research, does  
 19 not believe that it was -- that it constituted  
 20 genocide. "Does not believe" could either mean has no  
 21 opinion one way or the other, or it could mean believes  
 22 that it is not.

23 So for her to say that's -- it's consistent  
 24 with her statement if it means does not believe one way  
 25 or the other, it is inconsistent with her statement if

1 BY MR. FINNEY:  
 2 Q. Mrs. Schmidt, we've referred previously to  
 3 this document, I'm not sure of the exhibit number,  
 4 Exhibit --  
 5 A. E.  
 6 Q. -- E from the Turkish Coalition of America  
 7 where, to paraphrase, it says the Congresswoman does  
 8 not believe the tragic events of World War I in which  
 9 Armenians and Turks were killed in harrowing numbers  
 10 constitute genocide.

11 And my question is: Does that fairly represent  
 12 your position?  
 13 A. Those are Mr. Fein's words, not mine. As I  
 14 have continually said and will continually say: I  
 15 don't know enough about this issue to determine whether  
 16 it was genocide or not. I wasn't there. I don't have  
 17 enough knowledge of it at this point, and that's where  
 18 I am.

19 MR. FINNEY: Phil?  
 20 Mr. RICHTER: To me, that sounded as a  
 21 satisfactory response. It may not be that clear, but  
 22 it's satisfactory.

23 MR. FINNEY: Thank you. We'll call you if we  
 24 need you.  
 25 MR. BREY: Thank you, Phil.

1 it is believes that it is not. And her answer which  
 2 stated what her position was, is the only truthful way  
 3 you can respond to -- to a question like that which is  
 4 a equivocal question -- an equivocal questions.

5 Now, are --  
 6 MR. HARTMAN: She's not equivocating.  
 7 MR. FINNEY: Hold on, Curt. Just let --  
 8 Phil, I want to keep moving, so just rule and  
 9 we'll go on here.

10 Mr. RICHTER: I'm inclined to think that all she  
 11 can -- all she can assert to is whether Mr. Fein's  
 12 statement fairly represents her position. I would  
 13 think, too -- I'm inclined to believe, too, that a  
 14 simple "yes" or "no" answer is -- certainly if someone  
 15 wanted to give it, they could, but I don't know that it  
 16 would fairly represent a full and true answer to the  
 17 question.

18 MR. FINNEY: That's fine. Phil -- Phil,  
 19 we're on the record. Why don't I just ask her while  
 20 you're on the line and see if we can get an answer, and  
 21 then we'll let you go?

22 MR. BREY: I -- I think we've got an answer.  
 23 This will be the fourth time.  
 24 MR. FINNEY: Can you just hang on, Phil?  
 25 MR. RICHTER: Sure.

1 MR. RICHTER: Okay. Thank you.  
 2 MR. HARTMAN: I think the videographer needs  
 3 to change the tape.  
 4 MR. BREY: How long will that take?  
 5 THE VIDEOGRAPHER: Thirty seconds.  
 6 MR. BREY: Okay.  
 7 THE VIDEOGRAPHER: Please stand by.  
 8 (OFF THE RECORD)  
 9 THE VIDEOGRAPHER: We're now back on the  
 10 video record.

11 BY MR. FINNEY:  
 12 Q. Mrs. Schmidt, I was asking you when we broke  
 13 about the February 2008 fundraiser at Cafe Istanbul.  
 14 A. Uh-huh. Yes.  
 15 Q. We were going through some E-mails relating  
 16 to that.  
 17 Let me just ask you: Do you know who organized  
 18 that event outside of your campaign?  
 19 A. No.  
 20 Q. Do you know of -- of an individual who  
 21 solicited contributions for that event or participated  
 22 in helping you raise money for that event?  
 23 A. Phil Greenberg.  
 24 Q. Right. Your own campaign staff, but anybody  
 25 else? Somebody who is not on your campaign staff?

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90

1 A. No.

2 Q. Do you know a fellow by the name of Ahmet

3 Gultekin, and I'm going to spell that since I'm not

4 sure of the pronunciation: A-H-M-E-T, sometimes that's

5 pronounced "Ahmet." Gultekin, G-U-L-T-E-K-I-N. Do you

6 know Ahmet or Ahmet Gultekin?

7 A. I don't know the name. I might know the

8 individual, but I'm sorry, I don't remember the name.

9 Q. Okay.

10 MR. FINNEY: Do you have that photo from that

11 event? While I'm questioning, you can dig through and

12 try to find it. I don't think I have it.

13 BY MR. FINNEY:

14 Q. I'm going to mark something as Exhibit G.

15 Have you seen this document previously?

16 (EXHIBIT G MARKED FOR IDENTIFICATION)

17 A. (Perusing document.)

18 Q. With respect to what I've given you as

19 Exhibit G, Mr. -- do -- do you know why the Turkish

20 community raised money for you in your 2008 election

21 cycle?

22 A. I'm sorry. I was reading the document.

23 Q. Do you know why members of the Turkish

24 community in America raised money for you for the

25 2007/2008 election cycle?

92

1 Q. Okay. And whose picture is third on the

2 right of that photo?

3 A. Me.

4 Q. Yeah. And do you know anybody else who is at

5 that table?

6 A. Lincoln McCurdy.

7 Q. And which is that individual?

8 A. He's second from the left.

9 Q. Okay. Anybody else that you could name?

10 A. No.

11 Q. Is Ahmet Gultekin in that photo?

12 A. I don't know.

13 Q. Okay. And did -- did you go to that event?

14 A. Well, sure. I was sitting there.

15 Q. And -- and were you there for just a few

16 minutes? Or were you there for dinner or for a couple

17 of hours, or how long --

18 A. About an hour.

19 Q. About an hour. And what was the purpose of

20 the event?

21 A. To raise money for my campaign.

22 Q. Okay. And the people there then all donated

23 to your campaign?

24 A. You'd have to ask my fundraiser. I don't

25 take checks directly.

91

1 A. Well, I hope it's because they believe that

2 I'm a great American.

3 Q. Okay. And other than that hope, do you have

4 any information that would indicate to you why, in

5 fact, they are raising money for you?

6 A. A lot of people are interested in my

7 campaign.

8 Q. I appreciate that. My question, again, is:

9 Do you have any knowledge of the reasons why people in

10 the Turkish-American community would want to donate to

11 your campaign?

12 A. You know, I don't ask people why they want to

13 contribute to my campaign.

14 (EXHIBIT H MARKED FOR IDENTIFICATION)

15 Q. Okay. Let's go ahead and show you what's

16 been marked as Exhibit H. The photo on the bottom of

17 this, do you know what that is?

18 A. (Perusing document.) It's some guy. Let's

19 see -- oh, that's Robert Waxler.

20 Q. No. On the bottom photo --

21 A. Oh, the bottom.

22 Q. Try this again. The bottom photo of the two

23 --

24 A. Okay. The Turkish-American fundraiser for

25 Congresswoman Jean Schmidt at the Cafe Istanbul.

93

1 Q. Okay. And did any of these people talk to

2 you at the dinner about issues of concern to them?

3 A. I don't remember the conversations.

4 Q. Well, you said previously that you -- you --

5 you never ask people why they give to you. Do you

6 remember saying that?

7 A. Right.

8 Q. Okay. But sometimes people tell you why

9 they're giving to you, right?

10 A. I'm sure they do.

11 Q. Okay. And did of any these people that

12 evening tell you why they were giving to you?

13 A. I don't remember.

14 Q. Did any topic, any issue that was pending

15 before Congress or any international topic, come up at

16 that dinner?

17 A. I don't remember.

18 Q. Did they ask for any favors from the United

19 States Congress?

20 A. If anybody asked for a favor, I would

21 remember that.

22 Q. Okay.

23 A. Because that's -- would be wrong.

24 Q. That would be wrong to ask you to do a favor

25 for them?

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94

1 A. In conjunction -- in -- in -- in -- with  
 2 money attached, yes.

3 Q. So --

4 A. I would have to leave the room if somebody  
 5 was giving me a fundraiser and then wanted a favor; I  
 6 would leave the room.

7 Q. So if anybody ever discussed a congressional  
 8 issue with you at a fundraiser, you would leave the  
 9 room?

10 A. Well, that's not a favor; that's an issue.

11 Q. Oh, I'm sorry. So when I say "favor," I mean  
 12 a vote on a particular bill or something like that.

13 What did you mean by the word "favor"?

14 A. Well, usually a favor has some quid pro quo  
 15 attached to it.

16 Q. Right. We'll get to the quid pro quo later.  
 17 But what did you mean by a "favor"? What act would  
 18 somebody ask you to commit if they're asking for a  
 19 favor that they wouldn't ask you to commit to vote on a  
 20 particular -- a certain way on a particular issue?

21 A. What was that question?

22 Q. Well, when I asked you -- let's -- let's try  
 23 this again.

24 If someone is at one of your fundraising  
 25 events -- you have more than this as a fundraising

96

1 would have a congressional context attached to it.

2 Q. And so with respect to this fundraiser,  
 3 specifically, there's really two sides of this. One is  
 4 that they would ask you to do something, and you're  
 5 saying to your recollection they -- did they ask you to  
 6 take a particular position on -- on any bill or  
 7 resolution in Congress?

8 A. No.. I would have left.

9 Q. Did they discuss -- I'm sorry. So if at a  
 10 fundraiser someone asked you take a position on a bill  
 11 or a resolution, you would leave the fundraiser?

12 A. At a fundraiser? If they asked me to -- a  
 13 bill of their -- that they had a special interest in,  
 14 yes, I would leave.

15 Q. Okay. Okay. So that's your policy. If  
 16 anybody asked you at a fundraiser to take a position on  
 17 a bill or resolution before Congress, you would not  
 18 engage in that conversation and you would leave that  
 19 event; is that right?

20 A. If it has a particular interest to them that  
 21 would benefit them in a manner that was above the way  
 22 it would benefit ordinary citizens then, yes.

23 Q. Oh, wow. And so how many fundraisers have  
 24 you had? Have you had a dozens of fundraisers since  
 25 you've been in Congress?

95

1 event, right?

2 A. Right.

3 Q. Okay. Somebody goes to one of your  
 4 fundraising events and wants to talk about a pending  
 5 matter before United States Congress. From your  
 6 perspective, that's an entirely acceptable interchange;  
 7 is that correct?

8 A. Depending upon where the topic goes, yes.

9 Q. Okay. And then you differentiated that kind  
 10 of conversation by saying "favor" when I said that  
 11 somebody would do -- ask you to do them to do a favor  
 12 in Congress.

13 A. Well, favor is different.

14 Q. And tell me what you meant by the word  
 15 "favor" that would be different than the other  
 16 conversation that we just discussed.

17 A. It's such a wide open -- usually, to me, a  
 18 "favor" is if you do this, I'll do that. That's a  
 19 favor. That's when a conversation ends, whether it's  
 20 in my office or whether it's at a function to raise  
 21 money. I do not do favors for people just to raise  
 22 money or for any other reason. That is not in -- in my  
 23 purview.

24 I do what's right for the people of our  
 25 district, but I do not do favors for an individual that

97

1 A. Yes.

2 Q. Okay. And at all of those fundraisers, no  
 3 one at those events has ever asked you to vote a  
 4 particular way on a bill or a resolution that had a  
 5 particular interest in them?

6 A. If it's at a fundraiser, I have to tell them  
 7 it's inappropriate conversation and I end the  
 8 conversation. Now, if they persist in it, one of us is  
 9 going to leave.

10 Q. Okay. And has that ever happened at one of  
 11 your fundraisers?

12 A. People have started to bring up topics at  
 13 events that have been inappropriate, and I have told  
 14 them that it's inappropriate to talk about it and the  
 15 conversation ends.

16 Q. Okay. And have you ever then left the event  
 17 because that persisted?

18 A. No. People have been very good about ending  
 19 the conversation.

20 Q. Okay. So one of the -- again, I said one of  
 21 the reasons people might have an event would be to ask  
 22 you to do certain things, and the other might be  
 23 because they're appreciative of things that you have  
 24 done.

25 Do you know if this particular event was in

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1 appreciation or recognition of positions that you've  
2 taken in the United States Congress?  
3 A. No.  
4 Q. Okay. And I've given you as Exhibit G, this  
5 E-mail from Ahmet Gultekin relating to the February  
6 18th event.  
7 Do you see that?  
8 A. Yeah. The one that's got Dan Burton in it.  
9 Q. Uh-huh.  
10 A. Yes.  
11 Q. And then if you look at the bottom paragraph  
12 of that first page, can you read that to us?  
13 A. Well, this E-mail, which is the first time  
14 that I have seen it, says: "Congresswoman Schmidt is  
15 one of the few members of Congress which actually read  
16 Guenter Lewy's book about the Genocide, and is one of"  
17 -- that thing is missing -- "few members of Congress  
18 who actually doesn't believe that it was genocide. And  
19 an Armenian -- an Armenian American is running against  
20 her in the election because she opposes the resolution.  
21 We have a member of Congress from Ohio who is willing  
22 to stand up to the Armenian lobby, and it is important  
23 for the Turkish-American community to support her."  
24 Q. Okay. And then the next line is?  
25 A. "Make a donation online to

1 saying "understanding."  
2 BY MR. FINNEY:  
3 Q. But let me ask you again. Do you have any  
4 understanding of why Turkish Americans give money to  
5 your campaign?  
6 A. I think it's because they know how important  
7 Turkey is to America.  
8 Q. Okay. And no Turkish American has ever told  
9 you that they're either giving to you or raising money  
10 for you because of your position on the -- on the  
11 Genocide?  
12 A. No -- yes, absolutely. They -- I -- the  
13 question is: Did they ever give me money and say I'm  
14 giving you money because of my position on the Armenian  
15 Genocide? They have never said that.  
16 Q. Did your campaign ever solicit contributions  
17 because of the statements of Mr. Krikorian and his  
18 attacks upon you as it relates to the Armenian  
19 Genocide?  
20 A. I need to understand where you're going with  
21 that.  
22 Q. Well, I'm just asking you a factual question.  
23 Has your campaign, the Jean Schmidt for Congress  
24 Campaign, ever solicited donations on the basis that  
25 your opponent is an Armenian American or the -- the

1 www.jeanschmidt.com/http://www.jeanschmidt.com.  
2 Q. Okay. So were you aware of the fact that  
3 people were soliciting donations to your campaign  
4 citing your opposition -- your -- your denial of the  
5 Genocide, or it says "doesn't believe it was genocide,"  
6 and citing the fact that you had an Armenian-American  
7 opponent?  
8 A. Was I aware? No.  
9 Q. You were not aware of that?  
10 A. Absolutely not.  
11 Q. So did you have any idea why Turkish  
12 Americans or Turkish interests would want to raise  
13 money for your reelection campaign?  
14 A. Well, I think there are other interests with  
15 Turkey besides this issue.  
16 Q. Okay. Well, my -- and my question is: Do  
17 you -- do you know why or do you have some  
18 understanding of why Turkish Americans or Turkish  
19 interests would raise money for your campaigns?  
20 A. I don't ask why people help me.  
21 Q. I didn't ask if you asked. I asked if you  
22 had any understanding of why they did give?  
23 MR. BREY: Actually, you asked whether she  
24 knew in your last question.  
25 MR. FINNEY: Actually, I modified it by

1 statements that he has made about your position on the  
2 Armenian Genocide?  
3 A. That's not -- that's not --  
4 Q. (Unintelligible; cross-talk.)  
5 A. -- an inaccurate statement.  
6 Q. Has your campaign ever solicited donations  
7 using that information with donors to encourage them to  
8 give?  
9 MR. BREY: I -- I apologize. I'm -- I'm not  
10 sure I understand the question.  
11 Q. Okay. Well, there are two facts I'm talking  
12 about, okay? One is the attacks that Mr. Krikorian has  
13 made upon Mrs. Schmidt relating to the Armenian  
14 Genocide, and two is the fact that --  
15 MR. BREY: Okay.  
16 Q. -- Mr. Krikorian is an Armenian American.  
17 Now I'm asking, based upon those two facts,  
18 has your campaign ever solicited donations using those  
19 two facts with donors saying you should give to me  
20 because of X or because of  
21 Y?  
22 A. Well, I -- I believe that we point out that  
23 he accused me of taking bribes, and that would be a  
24 false and -- a false statement.  
25 MR. FEIN: Could you put a time frame on that

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102

1 --

2 MR. BREY: Yeah.

3 MR. FEIN: -- Chris?

4 MR. FINNEY: Well -- well, let's do that.

5 Let's go ahead into that packet that's in front of you.

6 And in there is a -- first one is an E-mail dated

7 September the 17th of 2008.

8 MR. BREY: Are you referring to Exhibit F?

9 MR. FEIN: What's the page number?

10 THE WITNESS: What page is that? (Perusing

11 document.)

12 MR. FINNEY: I don't know what page it is.

13 September 17th, 2008. The second line of the E-

14 mail it says:

15 Date: September the 17, 2008. I think they're in

16 date order, so it shouldn't be too hard to find.

17 MR. BREY: September what?

18 MR. FEIN: 17th.

19 MR. KRICKORIAN: 17th. I think it's like the

20 fourteenth page.

21 THE WITNESS: 9/17.

22 BY MR. FINNEY:

23 Q. And in this, Phil Greenberg says to Lincoln

24 McCurdy: "Can we send a letter out or raise some

25 additional funds? This is starting to become a more

103

1 recognized issue in this race."

2 And I believe they are referring to Mr.

3 Krikorian's statements as it relates to the Armenian

4 Genocide and your position on that.

5 A. And the fact that he stated that I took

6 bribes.

7 Q. In that article? That the one that they're

8 referring as the one where he said you took bribes?

9 A. Well, Mr. Krikorian's handbill stated --

10 Q. I'm not -- this is -- the handbill came in

11 November of '08 as I recall, is that right?

12 A. Yes.

13 Q. Okay. This -- this E-mail is in September of

14 '08.

15 A. Oh. Well, you'd have to ask Phil why it --

16 what that was about.

17 Q. Okay. And again, I'm going to ask you: Do

18 you or your campaign use issues to motivate people to

19 donate to your campaign?

20 MR. FEIN: Can we just stop for a second?

21 We're still trying to find the proper exhibit here.

22 MR. FINNEY: Sure.

23 MR. FEIN: I apologize.

24 MR. BREY: We are in Exhibit F. Am I looking

25 at the right --

104

1 THE WITNESS: Here -- here -- here --

2 MR. BOLINGER: Don, look around. I think it

3 might be page 14.

4 MR. BREY: Okay. Got it. Sorry. There.

5 BY MR. FINNEY:

6 Q. Are you aware of the fact that you're either

7 the top, or one of the top, recipients of Turkish-

8 American donations in the United States Congress?

9 A. I'm not aware of that.

10 Q. Are you aware of the fact that the Turkish

11 PACs have given you more money than any other -- as

12 much or more money than -- than any other candidate for

13 the United States Congress?

14 A. I'm not aware of that.

15 Q. How many countries have you visited since

16 you've been in the United States Congress?

17 A. Oh, wow. Oh, my gosh. Taiwan, Bahrain,

18 Pakistan, Kuwait, Iraq, Iran -- I mean, not Iran --

19 Iraq, Afghanistan -- not Iran -- not Iran. I'm trying

20 to go through the Middle East. Israel, Cosovo. Oh,

21 shoot. Where is Sarajevo? We stayed there.

22 MR. FEIN: It's in Serbia.

23 A. In Serbia. Thank you. It was not coming to

24 me. Barcelona; Spain. Oh, shoot -- it was -- it was

25 snowing starts with a "B," Bulgaria; oh, Ireland,

105

1 Germany, England, Canada, Turkey. I mentioned Germany.

2 Columbia, Panama -- oh; man, this isn't going to be a

3 complete list, I know it. I'm going to leave some out

4 -- Mexico -- oh shoot -- Jamaica -- and wait a minute,

5 there's more.

6 Q. It's not a memory test. You're okay.

7 A. Oh, shoot. The one where -- Nicaragua. Oh,

8 Africa, I forgot about the African trips: Nigeria,

9 Ethiopia, and I'm probably leaving things out.

10 MR. FINNEY: Okay. Why don't we go ahead and

11 take that 20 minute break --

12 MR. BREY: Okay.

13 MR. FINNEY: -- or so that I was talking

14 about, confer with my counsel, and have a little lunch

15 and then try to come back and wrap this up.

16 MR. BREY: That sounds good.

17 THE VIDEOGRAPHER: Please stand by.

18 (OFF THE RECORD)

19 THE VIDEOGRAPHER: We're now back on the

20 video record.

21 BY MR. FINNEY:

22 Q. Everybody ready? I want to do a few follow-

23 up questions from this morning. I'm just trying to

24 understand.

25 You said that your campaign chief of staff,

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106

1 Barry Bennett, runs your campaigns and that there's  
 2 some exemption in federal law that allows him to do  
 3 that?  
 4 A. Yes. They're allowed to take an active part  
 5 -- only the chief of staff.  
 6 Q. Okay. And my understanding of what you're  
 7 saying is that he -- he does that from the campaign  
 8 office. He runs your campaign from the campaign  
 9 office; is that right -- I'm sorry, from the  
 10 congressional offices; is that correct?  
 11 A. No. He runs it from the NRCC.  
 12 Q. So whenever he takes a phone call or opens up  
 13 an E-mail or something, he goes to the NRCC in order to  
 14 do that?  
 15 A. Yes. He -- he has to do it off-site.  
 16 Q. Okay. And does he then make up the time that  
 17 he takes away from the congressional office in order to  
 18 do that, or is that just part of his duties?  
 19 A. Well, he works about 60 hours a week as is.  
 20 Q. Okay. Now, in terms of the bringing of this  
 21 complaint, at what point did you become aware of these  
 22 statements by Mr. Krikorian that gave -- gave rise to  
 23 this complaint?  
 24 A. The Sunday before the election.  
 25 Q. And how did you find out about those?

107

1 A. They were placed on cars on church property.  
 2 Q. Let me ask: How did you, Jean Schmidt, find  
 3 out about them?  
 4 A. A friend of mine gave it to me.  
 5 Q. And who was that?  
 6 A. Joe Braun.  
 7 Q. Okay. And Joe's previously served in your  
 8 campaigns; I've met Joe.  
 9 A. Yes.  
 10 Q. And -- so at some point, you came up --  
 11 someone came up with the idea of filing this complaint  
 12 with the Ohio Elections Commission?  
 13 A. Yes.  
 14 Q. Whose idea was that?  
 15 A. It was basically mine.  
 16 Q. Okay. So at some point you said to someone,  
 17 I'd like to file a complaint about this?  
 18 A. When I looked at what the handbill said, they  
 19 were lies. It was saying that I took a bribe, and it  
 20 was absolutely false; it was a boldface lie. Things  
 21 were not in proper context, and I knew that Mr.  
 22 Krikorian had done this to affect the outcome of the  
 23 election.  
 24 Q. And what -- when you say "things weren't in  
 25 the proper context," what are you talking about?

108

1 A. He misquoted a statement of mine.  
 2 Q. Okay. Well, why don't we pull that out?  
 3 There's a -- a copy of the complaint has been given to  
 4 you already. Tell me which specific phrase you're  
 5 talking about was pulled out of context?  
 6 A. (Perusing document.) The second paragraph of  
 7 the -- after the darkened bold "has taken \$30,000 in  
 8 blood money to deny the Genocide of Christian Armenians  
 9 by Muslim Turks."  
 10 MR. BREY: For clarification, I believe we  
 11 are talking about Schmidt Exhibit C and Exhibit 1 to  
 12 Exhibit C.  
 13 Q. Okay. And you're saying that that bold text  
 14 is somehow taken out of context?  
 15 A. No, I'm saying the one below it: "At this  
 16 time she does not have enough information to  
 17 characterize these deaths as genocide, especially when  
 18 those responsible are long dead. Jean Schmidt's office  
 19 March 29th, 2007."  
 20 What Mr. Krikorian failed to do was to put  
 21 little dots in there because those were two separate  
 22 sentences that he just put together as if it was a  
 23 single sentence.  
 24 Q. Okay. That's the only thing you're referring  
 25 to when you say "taken out of context"?

109

1 A. That statement was taken out of context, yes,  
 2 from this. But there is also a problem with what's in  
 3 the bold.  
 4 Q. Oh, I understand. We can get to that later.  
 5 I just wanted to make sure I understood when you said  
 6 that word.  
 7 So you decided at some point that you wanted  
 8 to bring a complaint to the Ohio Elections Commission?  
 9 A. I wanted to see if it was feasible, yes.  
 10 Q. Okay. And who did you talk to about that  
 11 other than -- I don't want to talk to you about  
 12 communications with anyone with whom you'd formed an  
 13 attorney/client relationship.  
 14 A. My chief of staff.  
 15 Q. You talked to Barry Bennett about then going  
 16 to the Ohio Elections Commission about this?  
 17 A. Yes.  
 18 Q. And did -- at that time, had Barry talked to  
 19 anybody else about that, or that was the first  
 20 communication with him about that?  
 21 A. That was my first communication with him  
 22 about that.  
 23 Q. And he -- did he say he had thought about  
 24 that previously, or he had talked to anyone about that  
 25 previously?

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1 A. I don't remember his reaction. It was right  
2 -- right at -- well, it was over the phone, so I can't  
3 tell you what the reaction was because I called him.  
4 It was right before the election.

5 Q. Okay. And so how is it that then the  
6 complaint was bought? What happened after your  
7 conversation with Mr. Bennett?

8 A. Well, I got elected, took down yard signs,  
9 and then we pursued the feasibility of seeing where we  
10 could go with this.

11 Q. Okay. And who did you communicate with after  
12 that?

13 A. Barry Bennett did all the communication after  
14 that.

15 Q. You never had any conversations with anyone  
16 about this other than with Barry Bennett -- other than  
17 with your retained counsel?

18 A. About going to the Elections Commission on  
19 this?

20 Q. Correct.

21 A. Initially, no. After we filed it, yes.

22 Q. Okay. Okay. And we'll talk about that in a  
23 minute. But prior to that, you never were approached or  
24 talked to by Lincoln McCurdy or Bruce Fein or Mr.  
25 Saltzman or anyone else about that?

1 election to file it?

2 A. Well, in part, we were pretty busy in  
3 Congress on other issues that I had to focus a lot of  
4 my attention on.

5 Q. So at that time, Mr. Bennett had to spend his  
6 time on congressional activities instead of on this  
7 complaint; is that right?

8 A. Well, in part yes.

9 Q. Is that the only reason?

10 A. You would have to ask him.

11 Q. Okay. Because you had nothing to do with  
12 that preparation except by and through Mr. Bennett?

13 A. Correct.

14 Q. You didn't talk to any third party about it  
15 other than your own attorneys?

16 A. Other than my own attorneys? When we were  
17 preparing it, we talked to the attorneys.

18 Q. And do you know in what month you retained  
19 Mr. Brey and Mr. Bennett -- or Mr. -- Mr. Fein.

20 A. No.

21 Q. Was it shortly before filing the complaint,  
22 or was it closer to the election?

23 A. I don't know.

24 (CERTIFIED QUESTION)

25 Q. And how is Mr. Brey and Mr. Bennett -- or Mr.

1 A. Outside of preparation to take it to the  
2 Elections Commission, when it was surfacing as an idea,  
3 no.

4 Q. Okay. And then let's talk about the  
5 preparation to take it to the Elections Commission.  
6 How did you find Mr. Fein as your attorney?  
7 How was that -- how did that happen?

8 A. You would have to ask Mr. Bennett.

9 Q. You did not have anything to do with  
10 retaining Mr. Fein, except through Mr. Bennett?

11 A. Through Mr. Bennett.

12 Q. You didn't have any conversations with anyone  
13 about that?

14 A. No.

15 Q. Okay. And with respect to retaining Mr.  
16 Brey, the same answer? You -- you didn't have anything  
17 to do with it; Mr. Bennett took care of it?

18 A. Exactly.

19 Q. Okay. And do you know when that occurred,  
20 when they were retained to bring this action?

21 A. I don't have the exact date, no.

22 Q. Now, this particular complaint was brought on  
23 April the 29th of 2009.

24 A. Right.

25 Q. Do you know why it took so long after the

1 Fein being paid for these legal services?

2 MR. BREY: Objection. I instruct the witness  
3 not to answer.

4 MR. FINNEY: Okay. We'll certify that  
5 question, and we'll make a list for Mr. Richter.

6 MR. BREY: I -- I will tell you an identical  
7 question was objected to in -- in another deposition.

8 MR. FINNEY: I heard that it was, yes. And  
9 what's the basis for the objection?

10 MR. BREY: Well, it's already been ruled upon  
11 among other things. It's irrelevant to this case.  
12 It's not likely to lead to relevant matters.

13 BY MR. FINNEY:

14 Q. Have you retained Mr. Brey and Mr. Fein  
15 personally, or is it the campaign that has retained  
16 them?

17 A. The campaign has retained them.

18 Q. They work for the campaign?

19 A. Yes.

20 (CERTIFIED QUESTION)

21 Q. Okay. And has your husband then signed an  
22 engagement letter with them?

23 MR. BREY: I would object to that. That --  
24 that goes to the attorney/client communications.

25 You're not entitled to that information.



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1 MR. FINNEY: So you're telling her not to  
 2 answer?  
 3 MR. BREY: I'm telling her not to answer.  
 4 MR. FINNEY: And you're refusing to answer  
 5 the question on the basis of the advice of your  
 6 counsel; is that correct?  
 7 THE WITNESS: Yes.  
 8 MR. FINNEY: Certify that.  
 9 BY MR. FINNEY:  
 10 Q. Do you know -- there's been other charges  
 11 incurred other than legal fees --  
 12 (SOTTO VOCE DISCUSSION)  
 13 MR. FINNEY: I'm sorry. We want to certify  
 14 that last question as well.  
 15 Q. Other than just legal fees, there's been  
 16 travel expenses for Demir Karsan and -- and others in  
 17 this. Do you know who's paying those expenses?  
 18 A. No.  
 19 Q. Is your campaign paying those?  
 20 A. I don't know.  
 21 Q. Who would know?  
 22 A. The treasurer.  
 23 Q. Peter Schmidt?  
 24 A. He's no longer the treasurer.  
 25 Q. Who's the treasurer now?

1 A. I really can't -- other than my chief of  
 2 staff or my attorneys?  
 3 Q. Correct. Other than those two, is there  
 4 anybody else you've talked to about the complaint?  
 5 A. I can't -- I can't definitively tell you who  
 6 I did or I didn't talk to about the complaint.  
 7 Q. You remember something called the Turkish  
 8 Caucus in Congress; is that right?  
 9 A. Yes.  
 10 Q. When did you join the Turkish Caucus?  
 11 A. Either late last year or early this year.  
 12 Q. And why did you join the Turkish Caucus?  
 13 A. Oh, I join many caucuses.  
 14 Q. Super. I appreciate that information. That  
 15 didn't answer my question. My question is: Why did  
 16 you join the Turkish Caucus?  
 17 A. Well, understanding the importance of Turkey  
 18 and our role in the War on Terror, I think it's  
 19 important to have a good relationship with Turkey at  
 20 this point because they're an extraordinarily valuable  
 21 asset for us with the War on Terror.  
 22 Q. Okay. Is there any other reason?  
 23 A. Well, that would be my reason, sir.  
 24 Q. Did anybody outside of your own staff ask you  
 25 or encourage you to join the Turkish Caucus?

1 A. Phil Greenberg.  
 2 Q. Okay. Now, in terms of the drafting of the  
 3 complaint, did you draft the complaint?  
 4 A. No. My attorneys drafted the complaint.  
 5 Q. I see. Have -- you say since -- I had asked  
 6 you a question previously that said: Who had you  
 7 talked to about bringing the complaint?  
 8 And you said, Until the drafting, I hadn't  
 9 talked to anybody but Barry Bennett.  
 10 And I said I'd get to that later. Do you  
 11 remember that interchange?  
 12 A. Yes.  
 13 Q. And my question is: Who else have you talked  
 14 to about the bringing of the complaint since that time  
 15 -- since the beginning of the drafting and so on?  
 16 A. I have -- I have no idea.  
 17 Q. You have no idea who you talked to about the  
 18 complaint?  
 19 A. I couldn't get -- I could hardly give you an  
 20 accurate list of the countries that I've visited  
 21 because I've noted that I've missed two in -- in the  
 22 four years that I've been in Congress, so I can't give  
 23 you a list of people I've talked to.  
 24 Q. Well, why don't you tell me people you  
 25 remember having talked to about the complaint?

1 A. I've been encouraged to join many caucuses.  
 2 I only join them when I feel that I have a particular  
 3 interest to be involved.  
 4 Q. Thank you. Again, that question wasn't  
 5 responsive so I'll ask the question again.  
 6 A. I don't know.  
 7 Q. Did anybody outside of your own staff ask you  
 8 or encourage you to join the Turkish Caucus?  
 9 A. I don't know.  
 10 Q. You don't remember anybody doing that?  
 11 A. I -- I don't -- I'm asked all the time by  
 12 many people to join many caucuses. I don't remember  
 13 exact dates or exact people. So I honestly have to  
 14 tell you, I don't remember.  
 15 Q. That's a good answer. That's fine.  
 16 Now, at some point, you actually did a trip  
 17 to Turkey I think earlier this year maybe; is that  
 18 right?  
 19 A. Yes.  
 20 Q. Tell me about the trip to Turkey. Who  
 21 organized that?  
 22 A. It was -- I'm not sure of the exact group,  
 23 but we filed it with the Ethics Committee in Congress  
 24 to make sure that I could legally and ethically go on  
 25 the trip.

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1 Q. Okay. So some group outside of the United  
 2 States Congress, not -- not the Turkish Caucus itself,  
 3 organized the trip to Turkey?  
 4 A. Yes. That's not unusual.  
 5 Q. That's fine. It's in accordance with the  
 6 Congressional Rules.  
 7 A. Yes.  
 8 Q. And who did you talk to about going on that  
 9 trip? Who invited you? Who did you make arrangements  
 10 with?  
 11 A. Well, Barry Bennett, my chief of staff,  
 12 brought it to my attention, and he made the  
 13 arrangements. Well, actually, my assistant, Jennifer  
 14 Pielsticker, made the arrangements.  
 15 Q. Okay. Did you ever speak with anyone outside  
 16 of your staff about going on that trip prior to going?  
 17 A. Yes.  
 18 Q. With whom did you speak?  
 19 A. I don't remember every meeting or every  
 20 conversation.  
 21 Q. I didn't ask you to remember every one. Just  
 22 tell me the ones that you do remember.  
 23 A. Okay.  
 24 Q. And that will be -- sort of be a general  
 25 rule. When I ask you a question, there might be a

1 became your attorney in this case?  
 2 A. I don't remember.  
 3 Q. Do you remember meeting him before he became  
 4 your attorney in this case? Looking at him here today,  
 5 does he look familiar to you? Somebody that you knew  
 6 before he became your attorney?  
 7 A. Yes.  
 8 Q. He does? And in what context did you meet  
 9 with him or speak with him previously?  
 10 A. I meet with so many people for so many  
 11 different reasons.  
 12 Q. Okay. Well let's try this: Saying "I don't  
 13 remember" is a perfectly good answer, instead of a  
 14 longer answer than that. So is that what you're  
 15 saying, you don't remember?  
 16 A. You know, I remembered his face but I didn't  
 17 remember his name.  
 18 Q. Okay. Do you know the name of someone by the  
 19 name of Fettulah Gulan?  
 20 A. No.  
 21 Q. You don't?  
 22 A. No.  
 23 Q. You don't remember Fettulah Gulan being on  
 24 your trip to Turkey and squiring you all around the  
 25 country of Turkey?

1 hundred facts that you know and that exist and you only  
 2 remember four of them. I'm just looking for the ones  
 3 that you remember, okay?  
 4 A. Okay. We had a meeting in my office with  
 5 members that -- with other people that went on the  
 6 trip.  
 7 Q. Members of Congress or --  
 8 A. Their staff, their high-level staff.  
 9 Q. Okay. So other congressional staff members  
 10 talking about the trip?  
 11 A. Yes. We had a meeting in the office.  
 12 Q. And did you talk to anyone outside of the  
 13 staff of the United States Congress about that?  
 14 A. I don't know.  
 15 Q. Did you talk to Mr. Fein about that before  
 16 you went to Turkey?  
 17 A. I don't remember.  
 18 Q. Did you talk to Mr. Saltzman about it?  
 19 A. I don't know who Mr. Saltzman is.  
 20 Q. He's one of your attorneys in this case.  
 21 A. Okay.  
 22 Q. Have you ever spoken with Mr. Saltzman?  
 23 A. I don't know.  
 24 Q. Okay. Well, let me ask you this: Have you  
 25 ever had any conversations with Mr. Fein before he

1 A. I guess he did. I don't -- I'm really bad  
 2 with names. I don't know who that individual is, but  
 3 if you show me a picture, I might remember the picture..  
 4 Q. And you don't know that Fettulah Gulan and  
 5 his family has given you thousands and thousands of  
 6 dollars to your congressional campaign?  
 7 A. No. But that's awfully nice of him.  
 8 Q. How about the name, Yalcin Ayasli?  
 9 A. Nope.  
 10 Q. You don't remember that name at all as being  
 11 somebody that went along with you on the Turkish trip -  
 12 -  
 13 A. No.  
 14 Q. -- or has made contributions to your  
 15 campaign?  
 16 A. No.  
 17 Q. Now, with respect to the trip to Turkey, who  
 18 then paid for your travel? Who paid for your  
 19 accommodations, et cetera?  
 20 MR. BREY: I'll -- I'll will object. I'll  
 21 let her answer the question, but I'll object because  
 22 this entire line of questioning is about a trip that  
 23 took place in 2009 -- has nothing to do with any of the  
 24 allegations in the complaint.  
 25 MR. FINNEY: Thank you.

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1 MR. BREY: You can answer if you'd like.  
 2 A. Well, it occurred in the latter part of May  
 3 of this year. And I don't remember the organization  
 4 that -- that put this trip on. Again, it went through  
 5 the Ethics Committee in Congress. They said it was --  
 6 it was an appropriate trip, and I went.  
 7 Q. Okay. To your knowledge, was it paid for by  
 8 the Turkish government?  
 9 A. No, it would not have been -- I don't know.  
 10 I really don't know, Chris. I -- I don't handle those  
 11 details.  
 12 When we are given the opportunity to go on  
 13 trips, outside of the congressional CODEL, all of that  
 14 information has to go to Ethics Committee. I don't  
 15 prepare the documents. Generally my chief of staff  
 16 prepares the documents, and then either -- generally  
 17 Mrs. Pielsticker -- Ms. Pielsticker would then deliver  
 18 the documents and do subsequent communication.  
 19 I don't have any communication for any travel  
 20 plans with any trip that I take other than: This is  
 21 when you're going. Here's your itinerary. Here's what  
 22 you need to have packed. And maybe a week, if I'm  
 23 lucky, before the trip, I'm told what the parameters of  
 24 the trip are going to be and what the weather is going  
 25 to be.

1 everything. (Perusing document.) That goes over  
 2 through it?  
 3 MR. BOLINGER: Yeah. That's -- see look.  
 4 (Indicating document.)  
 5 MR. FINNEY: Okay. Okay. Well, why don't  
 6 you go to the front desk and get some tape, and then  
 7 we'll make a complete exhibit.  
 8 (EXHIBIT I MARKED FOR IDENTIFICATION)  
 9 BY MR. FINNEY:  
 10 Q. Let me go ahead and show this to you. This  
 11 will be marked as exhibit --  
 12 MR. FINNEY: What are we on? Do you know?  
 13 COURT REPORTER: H.  
 14 MR. BREY: I think we have H already marked.  
 15 COURT REPORTER: Do we?  
 16 MR. BREY: It's this picture.  
 17 COURT REPORTER: Okay. Thank you..  
 18 MR. FINNEY: Do you have stickers?  
 19 COURT REPORTER: I have these. Is this okay?  
 20 MR. FINNEY: Uh-huh. Just give me an "I."  
 21 I've got them, but they're buried here somewhere.  
 22 COURT REPORTER: Okay.  
 23 BY MR. FINNEY:  
 24 Q. And I'll give you what's been marked as  
 25 Exhibit I. It's a very long scroll, like we're back in

1 Q. Okay. So you -- you have no idea how your  
 2 lodging was paid, how your food was paid, how your  
 3 domestic travel --  
 4 A. No.  
 5 Q. -- was paid or how you --  
 6 A. No.  
 7 Q. -- got there? Okay.  
 8 Now, let's talk about -- there's another  
 9 document that you produced in conjunction with a  
 10 document request in this case. And what we have done,  
 11 is we had to paste it together in order to make it make  
 12 sense to us.  
 13 MR. FINNEY: Don, may want to look at that  
 14 first.  
 15 Is this all one thing here?  
 16 MR. BOLINGER: It -- it should be.  
 17 MR. FINNEY: There's not two pages?  
 18 MR. BREY: I thought there was two pages.  
 19 MR. BOLINGER: I think it might be folded.  
 20 MR. FINNEY: Yes, it's folded under. But I'm  
 21 saying this is everything? Actually, it's not folded  
 22 under. Is that the whole production that you had?  
 23 Look at -- pull yours out.  
 24 MR. BOLINGER: That's got to be --  
 25 MR. FINNEY: Well, yours is -- Yeah, this is

1 ancient Israel here. Roll that up.  
 2 A. (Perusing document.)  
 3 Q. We asked your attorney -- we asked you,  
 4 actually, to produce -- you, your campaign, and your  
 5 congressional staff to produce your contribution  
 6 records as they relate to Turkish donors, and this is  
 7 essentially what your staff, what your attorneys  
 8 produced to us.  
 9 Do you recognize this as such?  
 10 A. Since I didn't prepare the document, I can't  
 11 say whether I do or I don't.  
 12 Q. Okay.  
 13 MR. FINNEY: Okay. Don, I guess, can you  
 14 just help me with this? I mean, we've had both Exhibit  
 15 4 to the complaint and this, and I get a blank stare  
 16 from your client. Is --  
 17 THE WITNESS: There's nothing on here, you  
 18 know. There -- there -- this is a plain piece of paper.  
 19 It could have been brought out of thin air. I -- I  
 20 don't know where it came from.  
 21 MR. FINNEY: Well, I didn't produce it, so  
 22 I'll let your attorney --  
 23 THE WITNESS: Okay. Well, I don't know where  
 24 it was produced or who produced it. You just handed it  
 25 to me.

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1 MR. BREY: All right. This looks like it's -  
 2 - it's taped together of the documents that are  
 3 attached to Exhibit F, if that's your question, which  
 4 was a response that her -- I don't know whether this  
 5 came --  
 6 MR. FINNEY: So why -- since she can't tell  
 7 me what Exhibit 4 is and she can't tell me what this  
 8 is, for the record, why don't you tell us what we're  
 9 looking at?  
 10 MR. BREY: You're looking at a document that  
 11 we produced in response to a query of her campaign  
 12 committee. And I can't remember exactly what it was  
 13 stated, but it was either at paragraph 4, 5, 6, and 7,  
 14 I think, are the paragraphs of the subpoena that  
 15 request certain documents relevant to fundraisers that  
 16 referenced Turkish Americans in some fashion.  
 17 MR. FINNEY: Okay. And these are --  
 18 MR. BREY: And this is -- these are the  
 19 documents that as of -- through 2008 -- they don't have  
 20 any documents prior to 2007, although there may have  
 21 been a contribution. You know, we've referenced the FEC  
 22 stuff on that. So this is not including the 2009  
 23 information.  
 24 MR. FINNEY: And this is responsive then to  
 25 that inquiry; is that correct?

1 Q. Correct.  
 2 A. No.  
 3 Q. Do you know how much you received from the  
 4 Turkish Coalition of America PAC?  
 5 MR. FEIN: Is -- Chris, is this year election  
 6 cycle 2007/08?  
 7 MR. FINNEY: Uh-huh.  
 8 A. Not at this time. I mean, I'm sure I knew it  
 9 then, but I don't know it now; the exact amount, no I  
 10 don't.  
 11 Q. Okay. Are you familiar with the fact that  
 12 your attorneys Mr. Fein and Mr. Saltzman are principals  
 13 of the 'Turkish Coalition -- I'm sorry the Turkish  
 14 American Legal Defence Fund?  
 15 A. Yes.  
 16 Q. You are? And what is the Turkish American  
 17 Legal Defense Fund?  
 18 A. It's a US organization that has PAC.  
 19 Q. The Legal Defense Fund does?  
 20 A. I don't know. I don't know. I guess it  
 21 doesn't. I don't know. I don't know what it is.  
 22 Q. And do you know what the Assembly Of Turkish-  
 23 American Associations is?  
 24 A. That, I don't know.  
 25 MR. FINNEY: And then what's the other PAC's

1 MR. BREY: That's my understanding.  
 2 MR. FINNEY: Oh, I'm sorry.  
 3 COURT REPORTER: That's okay.  
 4 MR. FINNEY: And these obviously then do not  
 5 include any contributions from political action  
 6 committees, these are just individuals; is that  
 7 correct, Mrs. -- either one of you can answer, really.  
 8 THE WITNESS: Well, I don't see a political  
 9 action committee on here. It would say "PAC."  
 10 MR. FINNEY: And Don, I had asked you last  
 11 week if this represented the 2007 contributions.  
 12 MR. BREY: Right. And I've talked with the  
 13 campaign manager, Barry Bennett, who said that -- there  
 14 -- this includes 2008 and prior in terms of the  
 15 documents they have, other than, of course, the  
 16 documents that are already on file with the FEC.  
 17 And you -- you can verify that with him when  
 18 you depose him next week. But he was the guy who  
 19 pulled these documents together, not just me.  
 20 BY MR. FINNEY:  
 21 Q. And, Mrs. Schmidt, do you know how much you  
 22 received in contributions in the 2007/2008 election  
 23 cycle from Turkish Americans or Turkish people  
 24 supporting the Turkish entity?  
 25 A. The exact amount?

1 name?  
 2 MR. HARTMAN: The Turkish American Heritage  
 3 PAC.  
 4 Q. And what about The Turkish American Heritage  
 5 PAC, do you know anything about that?  
 6 A. No.  
 7 Q. And are you familiar with how much money  
 8 they've given to your campaign in the 2007/2008  
 9 election cycle?  
 10 A. No.  
 11 Q. Have you ever met with Lincoln McCurdy?  
 12 A. Yes.  
 13 Q. How many times have you met with Lincoln  
 14 McCurdy, and what do you know about him?  
 15 A. I -- I don't know how many times I've met  
 16 with him -- more than once, more than twice, more than  
 17 five times.  
 18 Q. Okay. And when you met with him, what did  
 19 you talk about?  
 20 A. A variety of things.  
 21 Q. Have you ever talked to him about the -- the  
 22 issue of the Turkish -- I'm sorry, of the Armenian  
 23 Genocide?  
 24 A. We've talked about the resolution that was --  
 25 never was actually voted on in Congress, but we talked

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1 about that resolution.

2 Q. Okay. And we're going to get to that a  
3 little bit later. What did he tell you about the  
4 resolution?

5 A. That basically, Turkey and America are  
6 extraordinarily important partners in the War on  
7 Terror. And that if we were to insult Turkey, that it  
8 may have a draconian effect.

9 I believe that it was Mr. -- I -- I don't  
10 know what -- there -- there were other people that gave  
11 me other -- and it could have been my chief of staff,  
12 so I'm not going to answer the rest of it. I just know  
13 that that is the tenet of what he would have said to  
14 me.

15 Q. You're not going to answer the question  
16 because why?

17 A. There are other reasons why. I don't know  
18 whether it was Lincoln McCurdy or my chief of staff or  
19 someone else that brought to my attention the history  
20 of this Genocide Resolution in Congress and how past  
21 administrations have talked to various Speakers of the  
22 House and reminded them, whether it be President  
23 Clinton or President Bush or President Bush the -- II,  
24 that in having Congress make an official act on this  
25 could jeopardize our relationship with Turkey.

1 was saying.

2 Q. And what are these draconian consequences  
3 that Mr. McCurdy told you about if -- if that did in  
4 fact --

5 A. He didn't explain it, but other people did.

6 Q. Well, who explained it to you?

7 A. My chief of staff would have been one and  
8 others that...

9 Q. And what --

10 A. And some it is sensitive documents that I  
11 can't talk about because they're, you know, in the --  
12 some of it has to do with sensitive documents that I  
13 have read about the War on Terror which I have signed  
14 an affidavit that says I will not disclose or discuss.  
15 And I don't want to get into a debate at this  
16 time and then cross over a line that I shouldn't be  
17 crossing over.

18 Q. Okay. Well, I'm not going to be asking about  
19 anything that you've promised some government agency to  
20 keep secret, okay? Let's be clear about that.

21 A. It's not a government agency, it's Congress.  
22 When you have sensitive documents and you are allowed  
23 to read those documents, you're not allowed to take any  
24 notes on those documents. You walk away -- you're  
25 don't -- not allowed to have a pen, take notes or

1 Now, that was said to me, but I don't  
2 remember who said it.

3 Q. So you said "jeopardize relationship," and  
4 then you used the word "draconian." Can you tell me  
5 what you mean by that? So if -- if the United States  
6 recognized the Turkish [sic] Genocide, what fate would  
7 befall us?

8 A. Well, I think you have to look at where we  
9 are with Turkey today and the War on Terror. And you  
10 have to look at the geographic --

11 Q. Go ahead. I'm sorry.

12 A. -- the geographic position of Turkey. And  
13 you have to say to yourself, How does it play out with  
14 the War on Terror and how important is it for us to  
15 have success and safety of our men and women in the  
16 battlefield.

17 Q. Okay. So I asked you a question which is  
18 that you told me that Lincoln McCurdy told you the word  
19 "draconian" and term -- I forget the other term -- but  
20 bad consequences would be come to us if we --

21 A. No. No. We -- we have a relationship with  
22 Turkey. The American government has a relationship with  
23 the Turkish government. Do we want to jeopardize that  
24 relationship by putting a resolution to the floor of  
25 Congress that may, in fact, do that? That's what he

1 anything, and they have to be sworn in confidence and  
2 secrecy because of the sensitivity of the documents.

3 So I hesitate when I get into discussions in  
4 this realm because I don't know what I've learned in  
5 the confines of that special room and what I've gleaned  
6 in a newspaper.

7 Q. Let's -- talk to me about that for a minute.  
8 You -- as a member of Congress, there are times when  
9 you're -- you're called into some special room where  
10 you review and read documents without taking notes and  
11 that you promise confidentiality of those documents, is  
12 that correct?

13 A. Yes.

14 Q. And how many times has that occurred since  
15 you've been in the United States Congress?

16 A. More than once.

17 Q. Okay. More than ten times?

18 A. Including the meetings, yes.

19 Q. Okay. And I'm not asking -- is that because  
20 of a particular committee that you sit on or a  
21 subcommittee?

22 A. No. No. If I was on a particular committee,  
23 it would be more times than you could possibly  
24 remember. As members of Congress, there are times when  
25 we are given the opportunity to read sensitive

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1 documents or go to meetings that have a sensitivity  
2 involved with them.

3 Q. Okay. And when you do that, you're signed a  
4 document swearing that you will keep that information  
5 confidential?

6 A. Yes.

7 MR. FINNEY: Don, she's claiming some sort of  
8 privilege that I'm not aware of. I guess I would like  
9 to see these documents that she signed that create this  
10 privilege.

11 THE WITNESS: I'm not sure they would give  
12 them to you.

13 MR. FEIN: You mean a nondisclosure  
14 agreement?

15 MR. FINNEY: Correct.

16 MR. FEIN: Yeah.

17 MR. FINNEY: In each instance.

18 THE WITNESS: I'm not sure that Congress  
19 would give that --

20 MR. FEIN: Yeah. I'm sure that we will be  
21 able to get copies from the House. This is customary  
22 when you're in Congress.

23 THE WITNESS: And in some cases, you don't --  
24 you know, it depends upon whether you go into the  
25 special room or the other room or whether it's a

1 Q. Okay. Well, I let me ask the question again,  
2 which is: What are the draconian consequences that are  
3 supposedly going to befall the United States -- and  
4 those are your words, not mine.

5 A. Right.

6 Q. If --

7 A. Perhaps I shouldn't have used the word  
8 "draconian" because I was only trying to remember a  
9 conversation and that's where you fall into trouble  
10 when you're trying to remember a conversation.

11 I don't remember exactly what the man said.  
12 What he brought to my attention was that Turkey and  
13 America have a good relationship and that --

14 Q. That he essentially threatened consequences  
15 to that relationship --

16 A. No, he did not.

17 Q. You need to let me finish my questions.

18 MR. BREY: Well, you need to let her finish  
19 her answer too. And you interrupted her answer, and  
20 then she interrupted your question that interrupted her  
21 answer.

22 MR. FINNEY: Okay.

23 Q. Go ahead, Mrs. Schmidt.

24 A. Turkey and America have a good relationship.  
25 It has evolved over the last 20 years. It's had its

1 meeting, but you're told it's classified and you're not  
2 allowed to talk about it.

3 MR. FINNEY: Okay. Well, for purposes of  
4 this conversation, I'm not sure I'm waving that for  
5 purposes of my questions for now.

6 So in other words, I'm going to state my  
7 general statement. I've asked the question, she's  
8 refused to answer. I insist that she does; she's  
9 refused to answer.

10 MR. BREY: What -- what -- what's she  
11 refusing to answer?

12 THE WITNESS: Well, what am I refusing to  
13 answer?

14 MR. FINNEY: Well, I've asked her questions  
15 about what are these draconian consequences that will  
16 befall the United States, and she's telling me she  
17 won't answer the question because --

18 MR. BREY: No, she has not told you that.  
19 She's answered the question, and she's says that she's  
20 trying to be careful when she answers the questions so  
21 she doesn't fall foul of something else.

22 Now, that -- that discussion may have been  
23 nonresponsive in terms of that, but I think she did  
24 respond to the question.

25 BY MR. FINNEY:

1 ups and its downs.

2 But in signing this -- in having Congress  
3 debate and pass this resolution the way it was written  
4 -- the way it was prepared, would have been an insult  
5 to the government of Turkey. And that could jeopardize  
6 America's relationship with Turkey.

7 Q. Why?

8 A. You'd have to ask the Turkish government, you  
9 know --

10 Q. Well, you just made the statement. I'm  
11 asking you your reasoning for having made that  
12 statement.

13 MR. BREY: Are you asking about the  
14 conversation she had with Lincoln McCurdy?

15 THE WITNESS: Why --

16 MR. FINNEY: No. No. I'm now asking her  
17 "why"?

18 THE WITNESS: Okay.

19 MR. FINNEY: She made the statement that if  
20 we did this, it would result in a deterioration in our  
21 relationship with Turkey and I said, "Why."

22 A. One of the things that members of Congress  
23 have to be keenly aware is that the world doesn't act  
24 the way we do, and that some countries are very  
25 sensitive to certain things. And that is why you have

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1 a secretary of state because their role is to learn  
 2 those nuances, those sensitivities, what hand you would  
 3 bring to shake, whether you'd bear an arm, whether you  
 4 look somebody directly in the eye, all of those things  
 5 are particular to different countries throughout the  
 6 world.

7 I am not an expert on all of them. I'm not  
 8 an expert on any of them. But I do understand that  
 9 each nation that we deal with has its particular  
 10 sensitivity or a particular nuance.

11 Now, when I'm told by someone that passing  
 12 the Armenian Genocide Resolution would make a country  
 13 uncomfortable in dealing with this, I take that at face  
 14 value.

15 In the same way that if I go to Afghanistan  
 16 and I give an individual -- an Afghanistan military  
 17 person an award and I look him directly in the eye, he  
 18 thinks that that is insulting to him. Because, you  
 19 know, when you make that mistake once and then you're  
 20 told that was the wrong thing to do, you learn that  
 21 when you hand somebody from Afghanistan an award, you  
 22 look down in order to do it.

23 I'm not an expert in this, but when somebody  
 24 tells me that if you do something there's going to be a  
 25 reaction, I take that as that's the way people's

1 emotions are, governments' emotions are, and you go --  
 2 and you go -- and you go forward.

3 Q. And that's what Mr. McCurdy told you, that if  
 4 the United States Congress adopted the resolution  
 5 regarding the Armenian Genocide, that there would be an  
 6 adverse reaction from Turkey?

7 A. Well, it could jeopardize our relationship  
 8 with Turkey.

9 (EXHIBIT J MARKED FOR IDENTIFICATION)

10 (EXHIBIT K MARKED FOR IDENTIFICATION)

11 Q. Okay. I'm going to go ahead and show you  
 12 what's been marked as Exhibits J and K. I've given you  
 13 copies. Are these the two resolutions? There's -- one  
 14 is from the 110th Congress and one is from the 111th  
 15 Congress.

16 A. Yes.

17 Q. One is --

18 A. Yes. I believe they are, but let me read  
 19 them.

20 MR. BREY: I'm sorry, which -- which are  
 21 they?

22 THE WITNESS: This 110th, and then this would  
 23 be the 111th, the Armenian Genocide Resolution.

24 MR. BREY: Oh, I see. I'm sorry. Okay.

25 BY MR. FINNEY:

1 Q. And are these the resolutions that you're  
 2 talking about?

3 A. Yes.

4 Q. Okay. Why don't you tell me: Have you  
 5 formulated a position on these two resolutions?  
 6 Neither of these have been voted on in the Congress.

7 A. Right.

8 Q. But if they had been voted on that --

9 MR. HARTMAN: In the subcommittee.

10 Mr. Brey: Objection. This goes far beyond  
 11 any issue dealing with this case.

12 MR. FINNEY: Thank you.

13 A. They were voted on in a committee that I  
 14 don't have jurisdiction of.

15 Q. Great. And my question is: Have you  
 16 formulated a position as to how you would vote on these  
 17 if they had come to the floor of Congress?

18 A. It's really irrelevant. The one is gone and  
 19 you don't know what happens on a House floor until it  
 20 happens. And this one, the March 17th, 2009 one, it  
 21 came forward; I don't think it's gotten out of  
 22 committee yet.

23 Q. Okay. I appreciate your interpretation, but  
 24 my question is: If House Resolution 106 had come to  
 25 the floor of Congress in the 110th Congress, had you

1 decided how you would vote on that if it did?

2 A. No.

3 Q. You never did?

4 A. No.

5 Q. Okay. And how about the one that is pending  
 6 right now before the 111th Congress?

7 A. I haven't decided yet.

8 Q. You haven't decided yet?

9 A. No.

10 Q. But I thought you just told us that you were  
 11 opposed to this because of the adverse effect it would  
 12 have on Turkish relations.

13 A. You didn't ask what my percentage of decision  
 14 was, but have I decided? Is this the absolute "yes" or  
 15 "no"? No.

16 Q. Okay. Well, why don't you tell us --

17 A. I have room to change my mind on this.

18 Q. Okay. Why don't you tell us what your  
 19 attitude toward these resolutions is, what your  
 20 position is?

21 A. You know --

22 MR. FEIN: That's a speech and debate clause.

23 That's privileged material.

24 THE WITNESS: Exactly.

25 MR. FINNEY: Are you instructing her not to.

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1 answer?

2 MR. FEIN: Yes.

3 MR. FINNEY: Okay.

4 MR. HARTMAN: On speech and debate grounds?

5 MR. FEIN: Yes.

6 MR. BREY: And frankly, on relevancy grounds.

7 BY MR. FINNEY:

8 Q. Have you communicated to anyone outside the

9 Congress of your position on House Resolution 106 from

10 the 110th Congress or House Resolution 252 from the

11 11th Congress?

12 MR. BREY: Objection as to Exhibit K, House

13 Resolution 252. That's -- that's not relevant for this

14 case.

15 A. I don't know.

16 BY MR. FINNEY:

17 Q. You don't know if you've ever spoken with

18 anyone about your position on -- on -- on House

19 Resolution 106 from the 110th Congress or House

20 Resolution 252 from the 11th Congress?

21 A. The resolution never came to the floor for a

22 vote so --

23 Q. I didn't ask you that --

24 A. Okay --

25 Q. I asked you if you've spoken with anyone

1 about it.

2 A. But -- but -- but words do matter here.

3 Q. You're right, they do. I asked a pretty

4 precise question.

5 MR. BREY: Chris --

6 A. And so you know, the fact that it didn't come

7 to the floor didn't mean that it had an opportunity to

8 have any amendments attached to it or any verbiage

9 changed. And so, you know, once the 110th session

10 left, all you have is this document. But this document

11 never came to the floor for an opportunity to be

12 changed for any consideration, so it's really

13 irrelevant because we didn't vote on it.

14 Q. Okay. I appreciate your viewpoint that it's

15 irrelevant, but I'm asking you a question which is:

16 Have you ever had conversations with anyone about your

17 position on House Resolution 106 before the 110th

18 Congress?

19 MR. FEIN: Chris, that's -- that's still --

20 it's speech or debate. If you're asking her to talk of

21 whether she had or remembers conversations with other

22 members in Congress, that's clear within the scope of

23 Speech or Debate Clause. It's different if you're

24 talking of whether she talked to the press, that's a

25 different area.

1 MR. FINNEY: Okay.

2 BY MR. FINNEY:

3 Q. Well, have you talked to anybody outside of

4 the United States Congress about your position on House

5 Resolution 106 before the 110th Congress?

6 A. Yes.

7 Q. With whom did you speak about it?

8 A. I couldn't tell you.

9 Q. Did speak with Mr. McCurdy about it?

10 A. I'm sure -- I don't know. I don't know.

11 Q. Did you tell anybody what your position was

12 on that resolution?

13 A. I know I've spoken in front of groups.

14 Q. Okay. When you spoke in front of groups, did

15 you tell them what your position was on that?

16 A. I don't know. I don't know exactly what was

17 said on the position of the resolution or the issue at

18 hand, so I can't directly answer it.

19 Q. I'm not asking you what was said by some

20 third party. I'm asking you, Jean Schmidt, member of

21 Congress, if you've ever spoken with anyone about House

22 Resolution 105 [sic] from the 110th Congress, and if

23 so, what did you say?

24 MR. BREY: Same objection. Unless you mean,

25 by "anyone" --

1 Q. 106, I'm sorry.

2 MR. BREY: Anyone other than members of

3 Congress or anyone --

4 MR. FINNEY: Anyone other than members of

5 Congress or your since retaining counsel.

6 A. I'm sure I have. I don't remember the

7 conversation, so I can't answer it beyond that.

8 BY MR. FINNEY:

9 Q. Okay. And you say you've spoken to groups

10 about this issue?

11 A. I've spoken in front of groups. The issue

12 may have come up, but I don't remember what I said.

13 Q. Okay. And would one of those -- so what

14 groups would you have spoken to about it?

15 A. I don't know.

16 Q. What would one of these groups have been the

17 fundraiser that you had in February of 2008 at the Cafe

18 Istanbul?

19 A. I don't know.

20 Q. You don't know if you spoke about House

21 Resolution 106 at the 110th Congress at that event or

22 not?

23 A. No.

24 Q. Okay. And then with respect to House

25 Resolution 252 before the 11th Congress, have you had

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1 any conversations about that?

2 MR. BREY: Objection as to relevancy. Also I

3 assume by "conversation," again, you mean other than by

4 people in Congress?

5 MR. FINNEY: I am, yes.

6 MR. BREY: You -- you can answer the question

7 as to people other than members of Congress and your

8 counsel.

9 A. Perhaps. I don't remember.

10 BY MR. FINNEY:

11 Q. Now, you told us before about how friendly

12 the Turkish government is to the United States. Do you

13 remember that conversation?

14 A. We have a good working relationship, yes.

15 Q. Okay. And did the Turkish government's

16 decision not to allow its ally, the United States of

17 America, to invade Iraq from the north in 2003 cost

18 American troops casualties?

19 A. What?

20 Q. Well, you acknowledge the Turkish government

21 made a decision before we invaded Iraq to prevent us

22 from using Turkish airspace or territory to effectuate

23 that invasion; is that correct?

24 MR. BREY: Objection as to relevancy. The

25 ads at issue talk about present tense of what happened

1 through a time line of -- in my mind of events.

2 The generals probably had a different way to

3 -- to go after whatever targets they were going after.

4 Q. And do you acknowledge that their refusal to

5 allow us access to their land for purposes of

6 conducting the invasion cost American lives?

7 A. No. How can you say that?

8 Q. Well, I'm asking you a question. You're the

9 one that gets to answer.

10 A. Well, I -- you can't -- that's like saying --

11 I don't know how you answer the question. I'm really

12 sorry, but because you have to change your position to

13 make an invasion, you're assuming that the change in

14 the position than cost lives. I don't know that.

15 Q. Okay. Are you aware that the new government

16 of Turkey -- well, you talked earlier about Atatand how

17 he made Turkey a secular country and made that part of

18 the constitution. Do you remember that?

19 A. Yes.

20 Q. And are you aware that the current government

21 of Turkey, in fact, is implementing a religious form of

22 government, and they're moving away from the reforms

23 that Atatut in place?

24 A. I think that's an over-characterization of

25 what's going on.

1 in November 2008, and what happened in 2003 has no

2 relevance to it.

3 MR. KRIRKORIAN: Sure it does.

4 MR. FINNEY: Are you instructing her not to

5 answer?

6 MR. BREY: No, I'm not.

7 MR. FINNEY: Thank you.

8 BY MR. FINNEY:

9 Q. You acknowledge that the Turkish government

10 refused us access to its airspace and land space to

11 help us conduct the invasion in 2003, correct?

12 MR. BREY: Objection. Separate the question

13 between airspace and land space because I think you're

14 asking two different questions.

15 (OTTO VOGE DISCUSSION)

16 Q. Okay. Let's talk about invade from the north

17 via the land.

18 Do you acknowledge that the Turkish

19 government refused us access to its land for purposes

20 of conducting the invasion of Iraq in 2003?

21 A. They did, but then they changed their mind.

22 Q. And when did they change their mind?

23 A. I'd have to go back and look at the timeline.

24 It was -- they changed their mind, but at that point --

25 and I wasn't a member of Congress, I'm just going

1 Q. Okay. Well, why don't you tell me your

2 understanding?

3 MR. BREY: Objection.

4 THE WITNESS: This is irrelevant.

5 MR. BREY: One, it's irrelevant. Two, you

6 haven't really laid a foundation.

7 BY MR. FINNEY:

8 Q. You can go ahead and answer.

9 A. I think you're overstating it.

10 Q. Okay. Well, why don't you go ahead and tell

11 me how I'm overstating it?

12 A. Well, I think there is a fear among people

13 that this government may be moving into a more

14 religious position. But from what I gathered in being

15 there in May, that is still a fear. And -- and -- and

16 maybe things have changed since May, but I think you've

17 overstated the situation.

18 Q. Does Turkey have an Islamic government today?

19 A. I believe it still has a secular government

20 today.

21 Q. Okay. And were you aware that the Turkish

22 prime minister has been reprimanded by the Turkish

23 Supreme Court regarding the bringing of Islamic law to

24 the Turkish government?

25 A. No.

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1 Q. Are you aware of any Turkish government  
 2 involvement in Al-Qaeda?  
 3 A. No.  
 4 Q. How about any Turkish involvement in Al-  
 5 Qaeda?  
 6 A. No.  
 7 Q. Do you think that Islamic governments are a  
 8 threat to the United States?  
 9 A. Depends upon the government.  
 10 Q. Okay. So as a general rule, no, it's not a  
 11 threat. It depends upon, subjectively, the government;  
 12 is that right?  
 13 A. Well, it depends upon who -- yeah, it depends  
 14 upon the government.  
 15 Q. What about radical Islam?  
 16 A. Radical Islam? In what context, radical  
 17 Islam?  
 18 Q. Is radical Islam a threat to the United  
 19 States?  
 20 A. It depends upon the context that you're using  
 21 the term "radical."  
 22 Q. Okay. Would the war in Iraq have progressed  
 23 differently if they had allowed an invasion, a land  
 24 invasion to go through Turkey?  
 25 A. I don't know. I'm not a general.

1 question. I'm not sure you should rely on my questions  
 2 as a source of your information.  
 3 MR. BREY: I would agree with that.  
 4 THE WITNESS: I didn't know. I guess so.  
 5 MR. FINNEY: Well, I could get quite far with  
 6 that line of questioning evidently.  
 7 BY MR. FINNEY:  
 8 Q. Other than -- are you -- prior to my  
 9 question, prior to today, were you aware that Dennis  
 10 Hastert is a lobbyist, a paid lobbyist, for the  
 11 government of Turkey?  
 12 A. No.  
 13 Q. How about Dick Gephardt?  
 14 A. No.  
 15 Q. Have you ever had any conversation with any  
 16 of them about U.S. relations with Turkey?  
 17 A. With who?  
 18 Q. Dennis Hastert or Dick Gephardt.  
 19 A. Dennis Hastert, no. Dick Gephardt, I don't --  
 20 I don't even -- I didn't know he was a paid lobbyist  
 21 for Turkey. I don't remember any conversation with  
 22 Dick Gephardt.  
 23 (EXHIBIT L MARKED FOR IDENTIFICATION)  
 24 Q. Attached to Mr. Krikorian's answer to this  
 25 complaint, was an article by the Southern Poverty Law

1 Q. Has any military -- any briefing that's not  
 2 privileged that you've received or any other  
 3 information that you've received, would -- would that  
 4 lead you to that conclusion?  
 5 A. No. That it would have -- what was the  
 6 question? I forgot the question.  
 7 Q. Could the war in Iraq have progressed  
 8 differently if we had been allowed to use land through  
 9 which to invade --  
 10 A. Well, differently, yeah, but in what context  
 11 differently?  
 12 Q. Well, to start --  
 13 A. If I pull out of my driveway backwards or  
 14 forwards, that's going -- that's going to have a  
 15 different behavior, but the outcome might still be the  
 16 same.  
 17 (SOTTO VOCE DISCUSSION)  
 18 Q. Okay. There are a number of influential  
 19 former members of Congress who are paid lobbyists for  
 20 the government of Turkey. Are you aware of that?  
 21 A. Yes.  
 22 Q. And are you aware that a Dennis Hastert is a  
 23 paid lobbyist for the government of Turkey?  
 24 A. I am now.  
 25 Q. Well, I wasn't asking you as a result of my

1 Center about the monies that Turkey is pumping into the  
 2 United States to influence the debate about Turkey and  
 3 the Genocide.  
 4 Have you ever -- I'm going to go ahead and  
 5 mark this as Exhibit L. Have you ever had an  
 6 opportunity to see that particular part --  
 7 MR. FEIN: Chris, could you give us copies?  
 8 MR. FINNEY: Sure, I'm sorry.  
 9 MR. FEIN: There, thanks.  
 10 MR. FINNEY: I imagine your familiar with  
 11 that though, Bruce.  
 12 MR. FEIN: Yes, I am. I wanted to make sure  
 13 I am correct at what these were.  
 14 A. No, I -- I haven't. And do you want me to  
 15 take the time to read all this?  
 16 Q. No. I just -- no. I just want to know if  
 17 you had ever read it or were familiar with the contents  
 18 of it.  
 19 A. No.  
 20 Q. Okay. And so you've not read Mr. Krikorian's  
 21 answer to the complaint in this matter?  
 22 A. No.  
 23 Q. Okay. Let's just talk about for a minute  
 24 about the Turkish Coalition of America PAC. You  
 25 receive campaign contributions from that organization,

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1 correct?

2 A. Yes.

3 Q. Okay. And to your knowledge, is there any

4 connection between the Turkish Corporation -- Turkish

5 Coalition of America PAC, and the Turkish government?

6 A. To my knowledge, there is no relation.

7 Q. And what do you base that knowledge upon?

8 A. Well, the fact that there has been no --

9 there has been no allegation that has surfaced that

10 would suggest that it is. There's been no FBI

11 investigation for anyone that has received any money

12 from this organization and...

13 Q. Can -- can you say definitively that there is

14 no connection between the Turkish Coalition of America

15 PAC and the Turkish government?

16 A. Based on the knowledge that I have, and based

17 on the knowledge that I have, yes.

18 Q. Okay. And what is that knowledge?

19 A. The fact that there has been no

20 investigation, there's been no allegations, there's

21 been nothing that has been reported that would suggest

22 that it has any relationship with the government of

23 Turkey.

24 Q. And how do you know there's been no

25 allegations and no investigation?

1 government?

2 A. There's a no red flag.

3 Q. Okay.

4 MR. BREY: Can we take a very short break?

5 MR. FINNEY: Sure. Absolutely.

6 THE VIDEOGRAPHER: Please stand by.

7 (OFF THE RECORD)

8 THE VIDEOGRAPHER: We are now back on the

9 video record.

10 BY MR. FINNEY:

11 Q. One thing I kind of didn't get to and want

12 to, we talked about the Turkish event in Newport,

13 Kentucky in February of 2008. I also want to ask about

14 one in May of 2008 in New York City.

15 A. Yes.

16 Q. Did you attend one there?

17 A. Yes.

18 Q. And can you tell me, again, how that came

19 about, who talked to you about it, who planned it and

20 arranged it, and so on?

21 A. It was on my schedule.

22 Q. So to your knowledge, your staff handled it

23 and you had very little involvement in setting it up?

24 A. Yes.

25 Q. Outside of your congressional staff -- or

1 A. Well, because when you put something on a

2 report, if there has been an allegation, it is duly

3 noted and then you have to explain yourself or turn the

4 money back or do something.

5 Q. So you've actually made inquiry of Lincoln

6 McCurdy about that issue or some other person?

7 A. Have I made an inquiry to Lincoln McCurdy,

8 no.

9 Q. Okay. So what do you -- has anybody on your

10 behalf asked Lincoln McCurdy that question?

11 A. You'd have -- I don't know.

12 Q. Okay. So your knowledge about the connection

13 between the Turkish Coalition of America PAC and the

14 Turkish government is just based upon an absence of any

15 information. You don't know for sure that there is no

16 connection, you just don't know that there is?

17 A. I know that there are no red flags.

18 MR. BREY: Thank you.

19 Q. And how about the Turkish Heritage PAC that

20 we talked about previously?

21 A. Same thing.

22 Q. The exact same set of answers for them?

23 A. Yes.

24 Q. You don't know one way or the other if

25 there's any connection between them and the Turkish

1 your campaign staff, there's no one you've talked to

2 about setting up that event?

3 A. I don't remember talking to anyone. It was

4 on my schedule. It was: Do you want to do this?

5 Here's the time. Here's the date. And I had to give up

6 my Indy tickets, and I said okay.

7 Q. You missed the Indianapolis 500?

8 A. I did.

9 Q. In order to attend that?

10 A. Yes.

11 Q. And can you tell me who -- who was in

12 attendance at that event, anybody you remember?

13 A. My chief of staff.

14 Q. Was Mr. McCurdy there?

15 A. Yes.

16 Q. Anybody else you know?

17 A. His wife.

18 Q. Okay. Was this Yalcin Ayasli there?

19 A. I don't know.

20 Q. Were there any donors at all that you

21 remember having been there?

22 A. No.

23 Q. Do you recall any of the conversations that

24 you had at that event?

25 A. Personal conversations, no.

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1 Q. I don't know what you mean by "personal," any  
 2 conversations of any type: personal, congressional,  
 3 campaign?  
 4 A. I don't -- no. I don't recall the  
 5 conversations.  
 6 Q. Okay. Was the -- was either of the  
 7 resolutions that we talked about relating to the  
 8 Armenian Genocide discussed at that event?  
 9 A. I don't know.  
 10 Q. It may have been?  
 11 A. Could have been. May not have been.  
 12 Q. Okay. And did you give a speech at that  
 13 event?  
 14 A. Yes.  
 15 Q. What did you talk about?  
 16 A. I don't remember.  
 17 Q. How does -- how does it happen when you give  
 18 a speech? Do you write your own speeches, or does Mr.  
 19 Bennett write it, or how did -- how did the text of  
 20 that speech come up?  
 21 A. Depends.  
 22 Q. Well, let's talk about that specific speech.  
 23 Do you remember?  
 24 A. No.  
 25 Q. Okay. Do you know if those are typed out?

1 Hittite Microwave?  
 2 A. What?  
 3 Q. Have you heard of -- previously of a company  
 4 called Hittite Microwave?  
 5 A. I don't remember.  
 6 Q. It's something that would be kind of hard to  
 7 forget, wouldn't it?  
 8 A. Not really.  
 9 Q. Okay. So you may have heard of it and  
 10 forgotten about it, or you may never have heard of it.  
 11 You don't know?  
 12 A. I don't know.  
 13 Q. Okay. In your complaint, you take issue with  
 14 Mr. Krikorian's use of the word "sponsorship" -- that  
 15 the two PACs that gave you money were sponsored by the  
 16 Turkish government.  
 17 Do you remember that?  
 18 A. Yes.  
 19 Q. And when -- what do you -- what do you give  
 20 meaning to the word "sponsor"? When you say that, what  
 21 do you mean?  
 22 A. First off, you have to go back to this --  
 23 where's his -- when he says, "Representative Jean  
 24 Schmidt has taken \$30,000 in blood money to deny the  
 25 Genocide of Christian Armenians by Muslim Turks," what

1 Do you read from prepared work that Mr. Bennett or  
 2 someone else on your staff prepares when you give a  
 3 speech in an event like that?  
 4 A. Sometimes I do. Sometimes I don't.  
 5 Q. And would the copy of that be available in  
 6 your files or word processor?  
 7 A. Mine?  
 8 Q. Your personal, your campaign, or the  
 9 congressional office?  
 10 A. I don't know whether it was prepared. I  
 11 don't know whether I talked off-the-cuff. I don't  
 12 remember.  
 13 MR. FINNEY: We would like to get a copy of  
 14 those speeches, and we'll send you a follow-up letter.  
 15 MR. BREY: Weren't those covered in the  
 16 original subpoenas? I think they were.  
 17 MR. FINNEY: I would hope so, but I haven't  
 18 received them if they were.  
 19 MR. BREY: Right. If they -- my  
 20 understanding is if they exist and were covered in the  
 21 original subpoenas, they've been provided to you,  
 22 except insofar as they're already in the record as  
 23 something here on the FEC website.  
 24 BY MR. FINNEY:  
 25 Q. Okay. Have you heard of a company called

1 he is saying is that I took a bribe.  
 2 Now, there has to be a quid pro quo. What's  
 3 the quid pro quo? And then he says, "the Turkish  
 4 government."  
 5 Q. Well, I think the quid pro quo would be your  
 6 denial of the Turkish Genocide and your opposition to  
 7 House Resolution 106 in the 110th Congress. That's  
 8 what he's talking about, right?  
 9 A. He's saying I took a bribe.  
 10 Q. Well, what's your definition of the word  
 11 "bribe"?  
 12 A. In this context, he's saying that I did a  
 13 quid pro quo and when you say that a member of Congress  
 14 has done something for a quid pro quo, that is a bribe.  
 15 Q. And so you're saying you did not -- are you --  
 16 -- are you admitting that or denying that you, in fact,  
 17 traded your vote in the United States Congress for a  
 18 pledge for your vote --  
 19 A. I never voted.  
 20 Q. I understand that. -- or a pledge for your  
 21 vote --  
 22 A. I never pledged.  
 23 Q. -- in exchange for campaign contributions?  
 24 A. I never pledged or committed or voted on this  
 25 resolution currently or the one in the 110th Congress.

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1 Q. And you, in fact, have testified that you  
 2 don't recall ever having any conversations with anyone  
 3 outside of the Congress -- outside of your  
 4 congressional staff, about House Resolution 106 from  
 5 the 110th Congress, is that correct?  
 6 A. I don't remember those conversations, no.  
 7 Q. Oh, now don't you don't remember them.  
 8 Before you told me they didn't occur.  
 9 A. I believe what -- it depends upon -- you were  
 10 --  
 11 MR. BREY: I don't -- objection. I think  
 12 you're mischaracterizing her testimony.  
 13 A. I don't when you -- I don't know when you --  
 14 you're mischaracterizing what -- what -- what we're  
 15 talking about. You have to go --  
 16 Q. Okay. So you may have had -- you may have  
 17 had conversations with people wherein you traded your  
 18 vote in exchange for those campaign contributions?  
 19 A. You're good trying to trick somebody up, but  
 20 it's not going to work, sir.  
 21 Q. Okay. Well, I'm just trying to understand  
 22 your testimony, then. Tell me what your testimony is  
 23 on that? What is --  
 24 A. I don't even know where you're going.  
 25 Q. What is it that you don't remember?

1 MR. BREY: Well, objection. That's an  
 2 improper question. You asked one question, then you --  
 3 you manipulate the question to say, Oh, then you said  
 4 this. Why don't you ask a direct question. I think  
 5 it's getting into an exchange that's -- that's not  
 6 getting anywhere.  
 7 (SOTTO VOCE DISCUSSION)  
 8 BY MR. FINNEY:  
 9 Q. Well, actually this line of questioning  
 10 started over the use of the word, "sponsorship." In  
 11 paragraph 14 of the complaint, you take issue with the  
 12 words "Turkish government sponsored."  
 13 A. Paragraph --  
 14 Q. This is of the original complaint --  
 15 A. Okay. Are you --  
 16 Q. -- paragraph 14, Exhibit C.  
 17 A. Paragraph 14.  
 18 MR. BREY: Okay.  
 19 A. (Perusing document.)  
 20 Q. Go ahead. I'm sorry.  
 21 A. Okay.  
 22 MR. BREY: Is there a question pending?  
 23 MR. FINNEY: Yes.  
 24 Q. My question has been: What is it that you  
 25 mean when you -- when you refer to the word "sponsor"?

1 You say that's a false statement, but tell me what your  
 2 understanding of the word "sponsor" is?  
 3 A. Well, what -- let's read paragraph 4 so  
 4 everyone has a clear understanding of what it says.  
 5 Paragraph 14: "Paragraph 4 of the November  
 6 2nd, 2008, letter further repeats the false assertion  
 7 that Jean Schmidt 'insanely deny'" -- and then "es" is  
 8 in brackets to show that we made it the verb to work  
 9 with the sentence, "...the Christian Armenian Genocide  
 10 at the hands of the Muslim Ottoman Empire." It also  
 11 largely repeats the doubly false statement in  
 12 Krikorian's website for the reasons set forth in  
 13 paragraphs 8 and 9 of this complaint: 'Jean Schmidt  
 14 has taken \$30,000 in blood money from Turkish sponsored  
 15 political action committees to deny the slaughter of  
 16 1.5 million Armenian men, women, and children by the  
 17 Ottoman Turkish Government during World War I.' In  
 18 addition, the statement makes the false assertion that  
 19 I received campaign contributions from 'Turkish  
 20 government sponsored' political action committees. No  
 21 political action committee that donated to my campaign  
 22 was 'Turkish government sponsored.' True copies of the  
 23 affidavits of Lincoln McCurdy, "M-C-C-U-R-D-Y," and  
 24 Demir, "D-E-M-I-R, "Karsan," K-A-R-S-A-N, "treasurer  
 25 and president of the Turkish Coalition USA PAC and the

1 Turkish American Heritage PAC, respectfully, are  
 2 attached as Exhibit 3."  
 3 Q. Okay. And by reading that paragraph, you  
 4 think that's somehow responsive to my question?  
 5 A. Yes.  
 6 Q. Okay. Well, let me try it again. What is  
 7 your understanding of the word "sponsor" as used in Mr.  
 8 Krikorian's statement and in your paragraph?  
 9 A. That I took money from the Turkish government  
 10 is what he's trying to say.  
 11 Q. So your understanding of the word "sponsor"  
 12 is the direct flow or passthrough of money from the  
 13 Turkish government through the PACs to you?  
 14 A. Yes. And that's a -- that's false. That  
 15 would be wrong. That's illegal.  
 16 Q. Okay. What about if donors to the PAC had  
 17 gotten money from the Turkish government?  
 18 A. I don't know how to answer that. I don't --  
 19 that would be -- I don't -- I don't know how to answer  
 20 that.  
 21 Q. And do you know if donors to those PACs had  
 22 gotten money from the Turkish government?  
 23 A. I don't know that they did or they didn't.  
 24 Q. When did you -- strike that.  
 25 Have you received any gifts of any type from

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1 Turkey or any of the Turkish lobbyists?  
 2 A. Gifts from a lobbyist?  
 3 Q. When you were in Turkey or otherwise, have  
 4 you ever received a gift from the government of Turkey?  
 5 A. I'm allowed under certain conditions to  
 6 receive gifts from foreign governments.  
 7 Q. You know, it's amazing. I ask these  
 8 questions that seem pretty simple, and you give me an  
 9 answer that's utterly unresponsive. Let me try it  
 10 again: Have you ever, either on your trip to Turkey or  
 11 otherwise, received a gift from the government of  
 12 Turkey?  
 13 MR. BREY: Objection. The question is  
 14 irrelevant to the extent it talks about events after  
 15 November 2008.  
 16 MR. FINNEY: Thank you.  
 17 BY MR. FINNEY:  
 18 Q. Please answer the question.  
 19 A. I don't know.  
 20 Q. You don't know if you've received gifts from  
 21 the government of Turkey?  
 22 A. I can't absolutely answer "yes" or "no."  
 23 Q. Okay. And have you ever received gifts from  
 24 Turkish lobbyists?  
 25 A. Gifts from lobbyists?

1 of it.  
 2 MR. BOLINGER: Actually, that is part of what  
 3 they produced today.  
 4 MR. FINNEY: That's what I just said.  
 5 MR. BOLINGER: Oh, I thought you said "not  
 6 produced."  
 7 MR. FINNEY: Yeah, produced today. So I  
 8 don't know, do we have a way of getting copies at the  
 9 front desk?  
 10 MR. HARTMAN: We may be able to, yes.  
 11 MR. FINNEY: Why don't you do that while I  
 12 continue then.  
 13 BY MR. FINNEY:  
 14 Q. Have you ever visited Mr. Krikorian's  
 15 campaign website?  
 16 A. Have I ever logged onto it personally?  
 17 Q. Uh-huh.  
 18 A. No.  
 19 Q. Have you ever seen a printout of any of it?  
 20 A. Yes.  
 21 Q. What parts of it have you seen printouts of?  
 22 A. I don't -- I can't specifically tell you.  
 23 Q. So under what circumstance would you have  
 24 seen these printouts of Mr. Krikorian's --  
 25 A. Somebody would have handed them to me and

1 Q. Yes.  
 2 A. I don't -- I only receive gifts that I'm  
 3 ethically allowed to receive, so I don't know whether --  
 4 --  
 5 Q. Why --  
 6 A. Because I asked --  
 7 Q. -- why -- why do you keep doing this?  
 8 A. Because Chris --  
 9 Q. I'm asking you a very simple question.  
 10 A. Chris, it's not a simple question. There are  
 11 -- there -- there --  
 12 MR. FEIN: Chris, define "lobbyist" so that  
 13 there's a universe of people. You mean people who are  
 14 registered under the Foreign Agents Registration Act or  
 15 are otherwise registered as lobbyists --  
 16 MR. FINNEY: Yeah.  
 17 MR. FEIN: -- it's a colloquial term.  
 18 BY MR. FINNEY:  
 19 Q. People who are registered as lobbyists, have  
 20 you received any gifts from them, lobbyists for the  
 21 government of Turkey?  
 22 A. I -- I don't believe so. I don't know.  
 23 (SOTTO VOCE DISCUSSION)  
 24 MR. FINNEY: This is something you-all  
 25 produced for us today. I guess we need to get copies

1 said, Did you see what Mr. Krikorian wrote?  
 2 Q. Okay. So it's just relating to the exhibits  
 3 to this complaint as the things that you've seen?  
 4 A. No. There have been others.  
 5 Q. Okay. And is it my understanding you don't  
 6 use a computer, is that why --  
 7 A. I don't use a computer.  
 8 Q. Are you aware of the fact that it's a crime  
 9 in Turkey to discuss the Armenian Genocide?  
 10 MR. BREY: Objection. I think there's no  
 11 foundation.  
 12 MR. FINNEY: Are you telling her not to  
 13 answer?  
 14 MR. BREY: No. I'm saying that you -- you  
 15 should ask it directly rather than insinuate that facts  
 16 are in evidence which aren't.  
 17 Q. Okay. Are you aware of the laws in Turkey as  
 18 it relates to the discussion of the Armenian Genocide?  
 19 A. No.  
 20 Q. Would it bother you to know, given your  
 21 support of Turkey, that the Turkish government doesn't  
 22 have respect for the First Amendment rights as we do in  
 23 the United States of America?  
 24 MR. BREY: I would object. It's utterly  
 25 irrelevant what she would feel or what would bother her

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1 about what the Turkish government does. And it also,  
 2 once again, assumes facts not in evidence and, frankly,  
 3 not pertinent to any issue of this case.  
 4 MR. FINNEY: Are you are instructing her not  
 5 to answer?  
 6 MR. BREY: I'm not instructing her not to  
 7 answer.  
 8 IF you want to tell him what you -- what you  
 9 -- what bothers you or not or respond as best you can,  
 10 go ahead.  
 11 A. Every country is different.  
 12 BY MR. FINNEY:  
 13 Q.. So it would not affect your support of Turkey  
 14 to know that?  
 15 MR. BREY: Objection. Again, you are telling  
 16 her that something is true and asking her to believe  
 17 it's true, and there's no foundation it is true.  
 18 MR. FINNEY: It is true.  
 19 MR. BREY: And then asking her to guess what  
 20 she would feel if that, in fact, were true. It's --  
 21 it's an obscure question that -- if she's able to  
 22 answer, go ahead.  
 23 A. I don't know what their First Amendment  
 24 rights are.  
 25 (EXHIBIT M MARKED FOR IDENTIFICATION)

1 MR. BREY: Thank you. Thank you. Which  
 2 exhibit is this?  
 3 MR. FINNEY: M.  
 4 BY MR. FINNEY:  
 5 Q. There's a --  
 6 A. So now when we know when I joined the Turkish  
 7 Caucus.  
 8 MR. BREY: He hasn't asked you a question  
 9 yet. He -- he can ask you a question.  
 10 THE WITNESS: Okay.  
 11 Q. Yeah. Well, why -- why don't you -- let me  
 12 ask that question. Do you now know, looking at Exhibit  
 13 M, when you joined the Turkish Caucus?  
 14 A. Apparently it was in March.  
 15 Q. March of?  
 16 A. 2008.  
 17 Q. It looks like early March of 2008; is that  
 18 right?  
 19 A. Well, March the 10th it says I'm going to.  
 20 That doesn't mean I officially joined, but sometime in  
 21 March I would assume that I did.  
 22 Q. So you went to a fundraiser at Cafe Istanbul  
 23 that raised more than \$10,000 for your campaign on  
 24 February the 18th, and within two to three weeks of  
 25 that event, you then joined the Turkish Caucus and

1 apparently related that to Lincoln McCurdy; is that  
 2 right?  
 3 A. Did I relate it to Lincoln McCurdy? No. Mr.  
 4 -- Mr. -- Mr. Bennett did.  
 5 Q. I see. But it was related to Mr. McCurdy all  
 6 -- all in that same two or three week time frame; is  
 7 that right?  
 8 A. Appears so, yes.  
 9 Q. And -- and your testimony has been that  
 10 there's no connection between those massive  
 11 contributions that were received on February the 18th  
 12 and your action prior to March the 10th on that issue;  
 13 is that right?  
 14 MR. BREY: I would object. There's been no  
 15 testimony or evidence that the contributions she  
 16 received were massive.  
 17 MR. FINNEY: Thank you. You can answer.  
 18 A. You are making assumptions as to why the  
 19 Turkish Caucus exists or for whatever reasons a member  
 20 would want to become a part of the Turkish Caucus.  
 21 There are other issues with Turkey besides this  
 22 genocide question.  
 23 BY MR. FINNEY:  
 24 Q. I didn't say anything about the Genocide.  
 25 All I said was on February the 18th of 2008, you went

1 to a fundraiser at Cafe Istanbul where you raised more  
 2 than \$10,000 from Turkish Americans who were desirous  
 3 of supporting your candidacy, and less than three weeks  
 4 later, you joined the Turkish Caucus of the United  
 5 States Congress.  
 6 And my question -- first of all, those dates  
 7 are indisputable, right? Both of those things  
 8 happened?  
 9 A. Yes.  
 10 Q. Okay. The second question, then, is: Are  
 11 you telling me that there was no correlation between  
 12 those events, that you received \$10,000 on February the  
 13 18th and within three weeks, you joined the Turkish  
 14 Caucus. There was no what you call "quid pro quo."  
 15 There was no cause --  
 16 A. No.  
 17 Q. Let me finish the question -- there was no  
 18 cause and effect relationship between those two events?  
 19 A. No.  
 20 Q. Was this about the same time that you  
 21 formulated your position against House Resolution 106  
 22 of the 110th Congress opposing recognizing the Armenian  
 23 Genocide?  
 24 A. I think I've been very clear that it is a  
 25 question for debate to use the term "genocide." And

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174

1 I've been very clear that I don't --  
 2 Q. Go ahead. I'm sorry.  
 3 A. I've been very clear --  
 4 Q. You --  
 5 A. -- that I don't have enough -- I just wanted  
 6 to make sure you were listening.  
 7 Q. I'm listening.  
 8 A. That I don't have enough knowledge to  
 9 determine whether it's a genocide or not.  
 10 (SOTTO VOCE DISCUSSION)  
 11 Q. Okay. When -- when did you first meet or  
 12 talk to Lincoln McCurdy?  
 13 A. I don't remember.  
 14 Q. Do you find it strange that Lincoln McCurdy  
 15 would take such a interest in a second-term Congressman  
 16 from Ohio who doesn't have any particular influence on  
 17 the issues that he has before Congress other than as a  
 18 congressman, just one of the 435 members of Congress?  
 19 A. No.  
 20 Q. And if I told you that you're the No. 1  
 21 recipient of contributions from Turkish Americans and  
 22 Turkish PACs in the United States for any member of the  
 23 United States Congress, could you give me any  
 24 explanation for why that would be?  
 25 A. No.

176

1 A. Yes.  
 2 Q. I just want to ask you about a few of your  
 3 donors to see what you know about them, if anything.  
 4 You received a three maximum contribution  
 5 from people with the last name, Ayasli, A-Y-A-S-L-I,  
 6 Orhan, Yalcin and Bahar. Do you know any of those  
 7 individuals?  
 8 A. No.  
 9 Q. Of the list -- two lists that you produced of  
 10 presumably Turkish-American contributions, only one of  
 11 these people resides in your district. There are some  
 12 30 or 40 people who do not.  
 13 Why would those people have a particular  
 14 interest in your campaign?  
 15 A. You'd have to ask them.  
 16 Q. There's somebody named Kaya Boztepe, K-A-Y-A,  
 17 last name, B-O-Z-T-E-P-E, gave you \$1800.  
 18 Do you know that person or why he would write  
 19 an \$1800 check to your campaign?  
 20 A. I didn't know it was a guy until you told me,  
 21 so...  
 22 Q. Actually, I don't know that. It may very  
 23 well -- Kaya is a woman's name, so it may very well be  
 24 a woman. I don't know. Kaya is a woman's name,  
 25 typically in America, I should say. Who knows what it

175

1 Q. And again, can you tell me when your  
 2 attorney/client relationship was created with Mr. Bruce  
 3 Fein?  
 4 A. I can't give you an exact date, no.  
 5 Q. Are you aware that Mr. Fein and Mr. Saltzman  
 6 do legal work for a variety of Turkish and Turkish-  
 7 American organizations?  
 8 A. No.  
 9 Q. Are you aware that Mr. Fein and Mr. Saltzman  
 10 have been registered agents of the Turkish government?  
 11 MR. BREY: Objection. Lack of foundation.  
 12 MR. FINNEY: I'm just asking if she's aware  
 13 of it.  
 14 A. No.  
 15 Q. I think I asked you this, but I just want to  
 16 make sure I understand it: The two affidavits that you  
 17 submitted in the complaint in this matter, do you know  
 18 who drafted those? (Coughing.) Excuse me, I'm sorry.  
 19 A. No.  
 20 Q. You only saw drafts through your chief of  
 21 staff, Mr. Bennett?  
 22 A. Yes.  
 23 Q. So any interaction he had with your lawyers  
 24 or any other outside persons would have been through  
 25 him and not -- not directly with you?

177

1 is in --  
 2 A. I -- I don't know. I don't know the  
 3 individual.  
 4 (SOTTO VOCE DISCUSSION)  
 5 Q. And we've already asked you, you don't know  
 6 who Ahmet Gultekin is and you've never met him to your  
 7 knowledge?  
 8 A. I don't remember meeting a man by that name.  
 9 I may have met that man, but I don't remember the name.  
 10 Q. It may be a woman for all I know. Is there a  
 11 woman by the name of Ahmet?  
 12 A. Well, that's true. It could be. I don't  
 13 know.  
 14 MR. FINNEY: Why don't we go ahead and make  
 15 copies of that.  
 16 MR. BREY: Incidentally, on Exhibit I, I just  
 17 noticed you seem to have omitted the name Halilullah  
 18 Ture. I don't know whether that makes a big  
 19 difference, but you probably should be aware that there  
 20 is --  
 21 MR. FINNEY: You--all omitted or I did?  
 22 MR. BREY: You did. The documents we gave  
 23 you had that.  
 24 MR. FINNEY: It was on what you produced, and  
 25 it was not on what I've given you back?

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1 MR. BREY: It's not a big deal to us. I just  
 2 wanted to bring it to your attention.  
 3 (BOTTO VOCE DISCUSSION)  
 4 MR. FINNEY: Can you show me, Don, where I'm  
 5 missing that name? I'm -- I'm missing something here.  
 6 MR. BREY: Yeah. If you take a look at the  
 7 short list, the next page.  
 8 MR. FINNEY: Oh, on the next page?  
 9 MR. BREY: The top, top line. It looks like  
 10 they pulled these four over, but they omitted the top.  
 11 MR. FINNEY: Oh, this street?  
 12 MR. BREY: Yeah, I think this is the county,  
 13 this is his name (indicating document.)  
 14 MR. FINNEY: I just have that one other  
 15 document that I want to ask her about. And then I  
 16 don't know if you have any rehabilitative testimony you  
 17 want, but I'd just like to confer with my counsel for a  
 18 few minutes and then wrap up.  
 19 MR. BREY: Okay. Want us to step out?  
 20 MR. FINNEY: Yes, that's fine. We'll go off  
 21 the record.  
 22 THE VIDEOGRAPHER: Please stand by.  
 23 (OFF THE RECORD)  
 24 THE VIDEOGRAPHER: We are now back on the  
 25 video record.

1 Q. And I don't know if he's blond, brunette, or  
 2 redhead or anything else.  
 3 A. You know, I -- I -- I have a bad habit of not  
 4 being able to remember names.  
 5 Q. Okay. Well, hopefully Exhibit N, which kind  
 6 of looks like a W on there. We'll...  
 7 MR. FINNEY: Is that -- what is that?  
 8 COURT REPORTER: It's an N.  
 9 MR. FINNEY: That's an N.  
 10 MR. BREY: N, as in "Nancy."  
 11 COURT REPORTER: Chicken scratch.  
 12 (EXHIBIT N MARKED FOR IDENTIFICATION)  
 13 BY MR. FINNEY:  
 14 Q. It might jog your entry, but this looks to me  
 15 to be a and calendar entry made on the internal  
 16 computer by Jennifer Pielsticker, who you've identified  
 17 as your scheduler, for November the 17th of 2008, which  
 18 would be shortly after the 2008 election. And at this  
 19 event, it says that your host for the evening are Drs.  
 20 Yalcin and Serpil Ayasli.  
 21 Does that jog your memory at all as to who  
 22 Dr. Ayasli is?  
 23 A. No.  
 24 Q. Do you remember spending the evening of  
 25 November 17th of 2008, with Dr. Ayasli?

1 MR. FINNEY: I'm going to see a specialist  
 2 about this this week, by the way. I still can't get  
 3 rid of it.  
 4 MR. FEIN: Are you still from...  
 5 MR. FINNEY: It's not as bad but...  
 6 MR. FEIN: Drugs don't work?  
 7 MR. FINNEY: They haven't yet.  
 8 MR. HARTMAN: We're good down here.  
 9 MR. FINNEY: All right. There you go, okay.  
 10 BY MR. FINNEY:  
 11 Q. I asked you previously about this fellow  
 12 who's a fairly significant donor to your campaign by  
 13 the name of Yalcin Ayasli -- and I apologize if I don't  
 14 know how to pronounce his name -- and you said you have  
 15 no idea who he is; is that right?  
 16 A. I don't recognize the name. I might  
 17 recognize the person, but I honestly don't recognize  
 18 the name.  
 19 Q. And I will represent to you it's my  
 20 understanding that he was your escort throughout your  
 21 trip to Turkey. You spent days and days with him.  
 22 You have no recollection of Yalcin Ayasli?  
 23 A. Was he the tall guy?  
 24 Q. I don't know if he's tall or not.  
 25 A. I don't --

1 A. Not with a name, no. I have to be honest  
 2 with you. I don't remember the people's names.  
 3 Q. Okay. Well, what about this event. It was a  
 4 Turkish Coalition of America reception that you went to  
 5 immediately after the 2008 election, which is a dinner  
 6 for Ambassador James Jeffrey.  
 7 Do you have any recollection of that?  
 8 MR. BREY: I'll object as to -- continuing  
 9 objection as to relevance because of the date, but you  
 10 can answer.  
 11 A. The only thing I remember is going to the  
 12 Willard Intercontinental Hotel, walking in for five  
 13 minutes and leaving.  
 14 Q. And why did you go?  
 15 A. Well, there are a number of receptions that  
 16 we are invited to go, and you pick and chose the ones  
 17 that you go to. Why I chose this one, I can't remember  
 18 at the time. But it is not a habit of mine to stay  
 19 more than five or ten minutes at any given reception.  
 20 Q. Okay. And did you at that event talk to  
 21 anybody about the Armenian Genocide Resolution, either  
 22 visit?  
 23 A. I don't remember, no. I don't remember,  
 24 sorry.  
 25 (BOTTO VOCE DISCUSSION)

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182

1 Q. Okay.

2 A. Did you say March 17th on this?

3 Q. This last event says it was November 17th,

4 right after the election.

5 A. Okay. I have to stand corrected because I

6 was looking at March 17th, 2008.

7 Q. Where is that on the Exhibit N?

8 A. Well, it's not; it's Monday. But I'm getting

9 tired so I looked at it as March, sorry, and I thought

10 that's what you said. But I looked at it as March 17.

11 If it's 11/17/08, there was a dinner that I

12 attended. I didn't stay for the whole dinner; I stayed

13 for part of it.

14 Q. Okay. Well, I ask all the same questions:

15 Do you recall being with Dr. Yalcin Ayasli that

16 evening?

17 A. No. And I bet I was probably sitting right

18 next to him, and I really don't remember.

19 Q. Okay. And did you recall if at that event,

20 you discussed the Armenian Genocide Resolution with

21 anybody in attendance?

22 A. I don't remember, no.

23 Q. Did you discuss at that event your defeat of

24 that Armenian-American candidate, Mr. David Krikorian?

25 A. I don't know.

184

1 me.

2 Q. Okay. And the topics of that conversation

3 were House Resolution 106?

4 A. Yes.

5 Q. Do you remember that?

6 A. I remember Mr. Krikorian wanting me to sign

7 onto House Bill 106.

8 Q. Yeah. But you told me previously that you

9 had no recollection of ever discussing House Resolution

10 106 with anyone. Now you're telling me you remember

11 that conversation?

12 A. Well, this is in confines of my office, and

13 you were -- the context of your questions before were

14 at fundraisers and events.

15 Q. Oh, okay. Well, me tell, have you ever

16 discussed House Resolution 106 with anyone in your

17 office or anywhere else, ever, at any time?

18 A. I've -- I --

19 MR. BREY: Again, objection as to if the

20 anyone else includes other --

21 MR. FEIN: Members of Congress.

22 MR. BREY: Members of the Congress or

23 counsel.

24 A. I remember Mr. Krikorian's meeting very well

25 because he became extraordinarily angry at me. It's a

183

1 (EXHIBIT O MARKED FOR IDENTIFICATION)

2 Q. Okay. I'm going to show you what's been

3 marked as Exhibit O. And we were originally confused

4 by the dates, so I don't want you to be. This was from

5 March of '07. This is something produced by your

6 office. Again, this is Ms. Fielsticker. Again, it

7 appears to be a calendar entry. And it says you're

8 meeting with the Armenian National Committee, and this

9 is a meeting at which Mr. Krikorian attended.

10 Do you remember this meeting?

11 A. Yes.

12 Q. Okay. And what do you recall about this

13 meeting?

14 A. Well, it was in my old office building, my

15 old office. I moved offices since then. And I

16 remember that my friend, actually, in Cincinnati

17 actually called me and said that Mr. Krikorian was her

18 friend and that he wanted to meet with me in Washington

19 and we did.

20 Q. And who was that who called you?

21 A. Michelle Schneider.

22 Q. Michelle Schneider said that she wanted you

23 to meet with Mr. Krikorian?

24 A. That it was her friend, her neighbor, and

25 that I should meet with him. He wanted to meet with

185

1 meeting you don't forget.

2 BY MR. FINNEY:

3 Q. Okay. Well, I didn't ask you why your answer

4 changed. I asked you if you remembered having

5 conversations with anyone else, ever, anywhere, other

6 than members of Congress and your counsel, about House

7 Resolution 106.

8 MR. BREY: Object to the statement that her

9 answer changed. I don't know whether it did or not.

10 The transcript will show it. But you can answer his

11 question.

12 A. I don't remember other conversations. I

13 remember this one only because of how irate he became

14 in my office.

15 Q. Okay. So other than this particular

16 conversation now, you don't remember any conversations

17 about House Resolution 106 at all with anyone, ever?

18 A. Again, I don't remember any other

19 conversation with any particular person. This I

20 remember because of his attitude in my office.

21 Q. Okay. That's fine. Well, let's just go on

22 with -- well, let me just cover that issue, the

23 attitude with the office.

24 So what happened then -- why don't you tell

25 me specifically when you say he got agitated. Why

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1 don't you tell me exactly what happened at the meeting  
2 in your office?

3 A. Mr. Krikorian wanted me to sign onto this  
4 resolution, and I told him that I needed to have more  
5 information, to which he kept arguing his point of  
6 view. And then he began to scream so loudly. Now, my  
7 chief of staff was not in the office at the time, but  
8 came in and said, "Is there a problem?" That's how  
9 loud Mr. Krikorian was.

10 Q. Okay. Well, go ahead. Tell me more.

11 A. And I politely told Mr. Krikorian -- he  
12 apologized for getting so upset. He asked to discuss  
13 it further, and I told him that I would investigate it  
14 further and formulate my own opinion.

15 Q. Okay. And is it customary after you have  
16 such meetings in your office with constituent groups  
17 that you have photos taken?

18 A. All the time.

19 Q. Okay. And did you then that have a photo  
20 taken with this group?

21 A. I would imagine I did.

22 Q. And if Mr. Krikorian was hostile and angry  
23 with you about that meeting, wouldn't it be odd that  
24 you would be seen five minutes later smiling together  
25 at a photo in your office?

1 entry prepared by Ms. Pielsticker, and the text in  
2 there would be something that she would have written;  
3 is that correct?

4 A. Right.

5 Q. And in there she says that the topic of the  
6 meeting is Armenian-American community issues,  
7 resolution -- House Resolution 106, the genocide in  
8 Darfur, foreign aid, and blockade against Armenia. Do  
9 you see that?

10 A. Yes.

11 Q. Okay. And what is the genocide in Darfur?

12 A. Well, I don't want to get -- I have to think  
13 of Darfur. It's in the Sudan. And at the time of  
14 this, I don't have my calendar for that period in front  
15 of me, but I believe the UN aid was being stopped and  
16 the folks were -- in Darfur -- were in need of aid and  
17 were starving and literally, dying.

18 Q. And I think I've even heard you speak of  
19 Darfur. You've spoken a lot about the events in Darfur,  
20 right?

21 A. Correct. It's just on this particular date,  
22 I don't know what the time frame was of what we  
23 discussed with Darfur.

24 Q. Okay. But you have acknowledged that what  
25 was going on in Darfur is, in fact, a genocide right?

1 A. No.

2 Q. So you acknowledge that that, in fact,  
3 happened?

4 A. That we had a picture? Well, I would -- I  
5 don't know whether we did or we didn't. But if I was  
6 betting, I would bet we did because 99.99 percent of  
7 the time when meetings with constituents occur in my  
8 office, we always take a photo.

9 Q. Okay. And then later that evening, you went  
10 to a reception with the Armenian National Committee as  
11 well, did you not?

12 A. I guess I did.

13 Q. Okay. And so you obviously weren't terribly  
14 upset about this conversation that you had with Mr.  
15 Krikorian because you then smiled and took a photo with  
16 him and socialized with him that evening, right?

17 A. I still was upset with his demeanor, but put  
18 that aside and you move forward.

19 Q. Okay. Now, at this meeting, if you look at  
20 this calendar entry, who -- who -- who drafted this  
21 document that we're looking at, do you know?

22 A. I don't know who drafted it. I mean, it  
23 appears to be Jennifer Pielsticker, but I don't know  
24 who drafted it.

25 Q. Okay. But this appears to be a calendar

1 A. I haven't said it's a genocide. I've said  
2 it's an atrocity.

3 Q. You've never referred to it as a genocide?

4 A. I don't believe I have.

5 Q. Okay. And do you believe what was going on  
6 at that time in Darfur was a genocide?

7 A. I can't say whether it was a genocide. I can  
8 tell you it was an atrocity.

9 Q. Have you ever voted on a resolution in  
10 Congress about the genocide in Darfur?

11 A. The genocide in Darfur, I don't remember.

12 MR. FINNEY: I'm just going to confer real  
13 quick with my counsel. I think we're ready to wrap up.

14 MR. BREY: Want us to take off?

15 MR. FINNEY: If you don't mind.

16 THE VIDEOGRAPHER: Please stand by.  
17 (OFF THE RECORD)

18 THE VIDEOGRAPHER: We are back on the video  
19 record.

20 MR. FINNEY: I don't have any more questions.

21 MR. BREY: We have nothing further. We  
22 advise you to read your deposition of this transcript.

23 (DEPOSITION CONCLUDED AT 3:34 P.M.)

24  
25

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190

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9 truth, and nothing but the truth; and that the said  
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11 by me and then reduced to typewritten form under my  
12 direction, and constitutes a true record of the  
13 transcript as taken, all to the best of my skill and  
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15 and signing of said transcript were waived by counsel  
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19 directly or indirectly, in this action.  
20  
21  
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25 **SUBMITTED ON: AUGUST 31, 2009**

192

1  
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14 accurate transcript of said deposition. **SUBSCRIBED** and  
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16 in the jurisdiction aforesaid.  
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19  
20 \_\_\_\_\_  
21 **Notary Public**  
22 **My Commission Expires:**  
23  
24  
25

191

1  
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3  
4  
5 **To the Reporter: I have read the entire transcript of**  
6 **my Deposition taken in the captioned matter or the same**  
7 **has been read to me. I request that the following**  
8 **changes be entered upon the record for the reasons**  
9 **indicated. I have signed my name to the Errata sheet**  
10 **and the appropriate Notary Certificate and authorize**  
11 **you to attach both to the original transcript.**  
12  
13 **PAGE NO.      LINE NO.                    CHANGE:**  
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\$	173:13	371 46:14
\$10,000 171:23 173:2 173:12	1915 14:2 14:10 14:24 16:18	4
\$1800 176:17 176:19	18:15 19:1 21:10	4 49:23 50:3 50:6
\$30,000 108:7 160:24 164:14	27:24 28:4 28:6 28:23 29:4 32:14 40:6 40:12 43:7 48:6 49:1	51:19 51:24 52:1 54:21 54:25 55:1 55:23 56:8 76:24 125:15 126:7 126:13 164:3 164:5
@	1916 14:10 16:19 40:6 40:12	40 176:12 435 174:18 45 24:17 466-3205 45:9 4th 26:7 29:3 81:2
0	2	5
05 12:24	20 105:11 136:25	5 126:13
06 12:25	2003 13:3 146:17	500 157:7
07 183:5	147:1 147:11 147:20	6
08 103:11 103:14	2007 60:3 61:5 62:1 63:20 67:4 108:19 126:20 127:11	6 71:15 71:16 126:13 60 106:19 6166 46:15
1	2007/08 128:6 2007/2008 58:4 58:5 90:25 127:22 129:8	7
1 108:11 174:20	2008 60:4 61:5 63:21 67:5 68:15 81:2 82:18 89:13 90:20 102:7 102:13 102:15 126:19 127:14 145:17 147:1 156:13 156:14 164:6 166:15 171:16 171:17 172:25 180:17 180:18 180:25 181:5 182:6	7 126:13 771 9:20
1.5 164:16	2009 8:8 29:3 111:23 121:23 126:22 140:20	8
10:55 8:9	2009E-003 8:13 2009E-012 8:13	8 36:16 37:9 37:18 37:24 71:14 71:15 71:18 164:13 859 46:14
105 144:22	24 31:7	9
106 140:24 142:9 142:19 143:17 144:5 145:1 145:21 161:7 162:4 173:21 184:3 184:7 184:10 184:16 185:7 185:17 188:7	24th 8:8 252 142:10 142:13 142:20 145:25 29th 108:19 111:23 2nd 164:6	9 45:8 164:13 9/17 102:21 99.99 187:6
10th 171:19 172:12	3	A
11/17/08 182:11	3 50:21 165:2	a.m 8:9 able 68:7 78:17 86:12 134:21 168:10 170:21 180:4
110th 139:14 139:22 140:25 142:10 142:19 143:9 143:17 144:5 144:22 145:21 161:7 161:25 162:5 173:22	3:19:09 13:5 3:34 189:23 30 176:12 30-ish 60:19 30s 60:19	absence 155:14 absolute 141:14 absolutely 31:22 46:4 74:25 99:10 100:12 107:20 156:5 166:22 acceptable 80:12 95:6 access 147:10 147:19 148:5
111th 139:14 139:23 141:6 142:11 142:20 145:25		
12 38:3 80:24		
14 104:3 163:11 163:16 163:17 164:5		
14th 73:2		
1-614 45:9		
17 102:15 182:10		
17th 102:7 102:13 102:18 102:19 140:20 180:17 180:25 182:2 182:3 182:6		
18th 98:6 171:24 172:11 172:25		

1302904420001

140047401001100

accommodations 121:19	admit 86:4	A-H-M-E-T 90:4
accord 41:19	admitting 161:16	aid 188:8 188:15 188:16
accordance 118:5	adopted 39:13 139:4	air 125:19
according 30:5	ads 146:25	airspace 146:22 147:10 147:13
accurate 42:4 42:9 43:16 44:1 47:3 48:10 54:2 82:23 83:13 84:6 86:8 115:20	advanced 36:2	Al 150:4
accurately 44:6 81:13 81:19 86:13	advancing 64:3	allegation 154:9 155:2
accusation 41:17	adverse 139:6 141:11	allegations 121:24 154:20 154:25
accused 101:23	advice 56:1 77:17 114:5	Allies 16:11
accuses 37:13	advise 189:22	allow 146:16 148:5
acknowledge 39:18 40:5 40:10 146:20 147:9 147:18 148:4 187:2	affect 107:22 170:13	allowed 29:25 58:22 106:4 132:22 132:23 132:25 135:2 150:23 151:8 166:5 167:3
acknowledged 188:24	affidavit 51:11 52:18 52:21 53:24 54:8 54:24 55:1 55:12 56:8 56:18 76:23 77:10 77:14 77:16 79:3 79:4 132:14	allows 106:2
act 35:14 36:7 94:17 130:24 137:23 167:14	affidavits 164:23 175:16	ally 146:16
action 111:20 127:5 127:9 164:15 164:20 164:21 172:12	affiliated 74:20 74:22 75:1 75:13	Al-Qaeda 150:2
active 106:4	affirm 9:6	already 19:5 43:5 108:4 113:10 124:14 127:16 159:22 177:5
activities 64:12 112:6	Afghanistan 104:19 138:15 138:16 138:21	am 10:20 14:22 15:8 22:1 38:12 38:17 44:1 88:18 103:24 135:12 138:7 146:5 151:24 153:12 153:13
activity 61:25 62:8	Africa 105:8	amazing 166:7
actually 10:3 13:5 15:15 27:8 36:13 37:1 37:21 39:16 40:19 42:23 47:8 56:12 58:17 71:15 76:14 76:17 77:7 81:23 98:15 98:18 99:23 99:25 117:16 118:13 123:21 125:4 129:25 155:5 163:9 168:2 176:22 183:16 183:17	African 105:8	Ambassador 181:6
ad 74:15	aftermath 24:16	ambiguous 15:25 20:18 21:4
added 27:21	afterwards 35:18	Amendment 169:22 170:23
addition 164:18	against 98:19 173:21 188:8	amendments 143:8
additional 102:25	age 24:18	America 41:6 81:1 88:6 90:24 100:7 128:4 130:5 136:13 136:24 146:17 153:24 154:5 154:14 155:13 169:23 176:25 181:4
address 9:17 73:3	agency 132:19 132:21	American 91:2 98:19 100:8 100:25 101:16 104:8 128:14 128:16 128:23 129:2 129:4 131:22 146:18 148:6 165:1 175:7
addressed 73:3 73:10	agents 167:14 175:10	Americans 55:24 65:1 99:12 99:18
addresses 55:8	agitated 185:25	
adjourn 11:23	ago 39:2	
adjourned 12:5	agreement 68:22 134:14	
administrations 130:21	ahead 18:20 45:25 46:18 49:20 58:21 62:12 66:20 68:18 77:25 81:25 84:2 91:15 102:5 105:10 124:10 131:11 136:23 139:11 149:8 149:10 153:4 163:20 170:10 170:22 174:2 177:14 186:10	
	Ahmet 90:2 90:5 90:6 90:6 92:11 98:5 177:6 177:11	

100-1000-100

100:4 126:16	155:22	143:25
127:23 173:2	<b>anybody</b> 89:24 92:4	<b>aren't</b> 72:12 169:16
174:21	92:9 93:20 94:7	<b>arguing</b> 186:5
<b>America's</b> 137:6	96:16 109:19 115:9	<b>arguments</b> 79:2
<b>among</b> 113:11 149:12	116:4 116:24 117:7	<b>arm</b> 138:3
<b>amount</b> 127:25 128:9	117:10 144:3	<b>Armenia</b> 48:6 188:8
<b>ancient</b> 125:1	144:11 155:9	<b>Armenian</b> 14:3 14:4
<b>ancillary</b> 31:14	157:12 157:16	14:4 14:13 14:14
<b>angry</b> 184:25 186:22	181:21 182:21	14:15 14:25
<b>answer</b> 10:20 11:15	<b>anyone</b> 26:23 27:1	15:12 15:12
11:16 17:18	109:12 109:24	16:18 17:1 18:16
19:11 20:13 22:5	110:15 110:25	19:1 20:1 20:5
23:17 37:21	111:12 118:15	20:19 21:10
44:10 44:11	119:12 142:8	21:11 21:12
44:13 44:16 47:5	142:18 142:25	24:25 24:25 25:7
47:10 47:15	143:16 144:21	27:13 27:17
47:16 57:8 75:5	144:25 145:2 145:3	30:12 30:18
76:13 76:16	145:4 154:11 157:3	30:24 31:12 32:1
76:18 77:6 77:8	162:2 184:10	32:12 33:5 36:14
78:22 80:11	184:16 184:20	37:25 38:4 38:9
80:12 80:17	185:5 185:17	41:25 43:24 47:4
81:14 81:18	<b>anything</b> 10:23 18:21	47:13 48:2 81:13
81:21 82:25	20:8 24:23 30:1	98:19 98:19
83:12 83:14	32:17 32:23	98:22 100:14
83:17 84:18	33:13 65:22	100:18 100:25
84:24 85:1 85:11	70:25 74:24	101:2 101:13
85:19 86:2 86:5	79:15 80:2 111:9	101:16 103:3
86:14 86:14 87:1	111:16 129:5	129:22 138:12
87:14 87:16	132:19 133:1	139:5 139:23 158:8
87:20 87:22 111:16	172:24 176:3 180:2	164:9 164:16 169:9
113:3 114:2	<b>anywhere</b> 163:6	169:18 173:22
114:3 114:4 116:15	184:17 185:5	181:21 182:20
117:15 120:13	<b>apart</b> 77:20	183:8 187:10
120:14 121:21	<b>apologize</b> 45:17	<b>Armenian-American</b>
122:1 127:7 130:12	101:9 103:23	99:6 182:24 188:6
130:15 135:8 135:9	179:13	<b>Armenians</b> 28:9
135:11 135:13	<b>apologized</b> 186:12	40:6 41:16 42:18
135:17 136:19	<b>apparently</b> 81:2	43:1 49:1 81:7
136:19 136:21	83:17 171:14 172:1	88:9 108:8 160:25
142:1 144:18 145:7	<b>appears</b> 172:8	<b>arranged</b> 156:20
146:6 147:5	183:7 187:23	<b>arrangements</b> 118:9
148:9 148:11 149:8	187:25	118:13 118:14
152:24 153:21	<b>appreciate</b> 46:21	<b>article</b> 25:14
165:18 165:19	91:8 116:14 140:23	103:7 152:25
166:9 166:18	143:14	<b>articles</b> 33:4 33:5
166:22 169:13	<b>appreciation</b> 98:1	33:9 33:11
170:5 170:7 170:22	<b>appreciative</b> 97:23	<b>aside</b> 187:18
172:17 181:10	<b>approached</b> 64:20	<b>aspect</b> 38:18
185:3 185:9 185:10	110:23	<b>Assembly</b> 128:22
<b>answered</b> 44:9	<b>appropriate</b> 11:22	<b>assert</b> 36:8 87:11
44:19 76:15	17:10 41:13	<b>assertion</b> 164:6
77:12 77:13	85:10 122:6	164:18
81:22 85:14	<b>appropriately</b> 44:9	<b>assessment</b> 40:7
85:15 135:19	<b>approximately</b> 8:9	<b>asset</b> 116:21
<b>answers</b> 13:11	<b>April</b> 111:23	<b>assistant</b> 118:13
76:15 135:20	<b>area</b> 34:12 34:24	<b>associated</b> 71:3

71:25 75:18 75:24  
**Associations** 128:23  
**assume** 16:21 54:6  
71:22 74:4 146:3  
171:21  
**assumed** 54:9  
**assumes** 53:13 54:8  
170:2  
**assuming** 53:13  
148:13  
**assumptions** 34:16  
34:17 172:18  
**Atat** 29:19 29:23  
30:2  
**Atatand** 148:16  
**Atatfought** 29:20  
**Atatfrom** 29:17  
**Atatinvolvement** 30:3  
**Atatput** 148:23  
**atrocitiy** 189:2 189:8  
**attach** 77:4 78:8  
**attached** 49:8  
49:10 49:15  
49:15 49:22  
51:17 52:18  
52:20 53:24  
54:21 54:25  
56:18 71:24 72:2  
72:3 76:22 77:11  
77:13 77:14  
77:15 79:3 79:4  
79:5 79:18 94:2  
94:15 96:1 126:3  
143:8 152:24 165:2  
**attaching** 55:23 56:8  
78:5 79:19  
**attachments** 72:12  
**attacks** 100:18  
101:12  
**attempt** 35:19 48:9  
**attend** 66:24  
156:16 157:9  
**attendance** 157:12  
182:21  
**attended** 182:12  
183:9  
**attention** 22:4 112:4  
118:12 130:19  
136:12 178:2  
**attitude** 141:19  
185:20 185:23  
**attorney** 8:17 8:19  
12:8 18:16 34:15  
41:6 55:11 55:25  
56:6 56:14 79:15

79:17 80:3 81:4  
84:7 84:10 84:12  
84:14 84:14 85:5  
111:6 120:1  
120:4 120:6  
125:3 125:22  
**attorney/client** 56:5  
56:10 57:1 57:9  
76:18 77:6 77:18  
77:24 78:4 78:18  
79:14 79:22 80:2  
109:13 113:24  
175:2  
**attorneys** 17:24  
40:20 112:15  
112:16 112:17  
115:4 116:2 119:20  
125:7 128:12  
**August** 8:8  
**author** 24:5 31:25  
84:15  
**authored** 41:6  
**authoritative**  
32:11 32:13  
**authors** 30:15 33:8  
35:2 35:13  
**available** 159:5  
**award** 138:17 138:21  
**aware** 36:2 36:8  
47:12 47:25 48:5  
64:8 99:2 99:8  
99:9 104:6 104:9  
104:10 104:14  
106:21 134:8  
137:23 148:15  
148:20 149:21  
150:1 151:20  
151:22 152:9 169:8  
169:17 175:5 175:9  
175:12 177:19  
**awareness** 78:7  
**away** 106:17 132:24  
148:22  
**awfully** 121:7  
**Ayasli** 121:8  
157:18 176:5  
179:13 179:22  
180:20 180:22  
180:25 182:15  
**A-Y-A-S-L-I** 176:5

---

**B**

---

**backwards** 151:13  
**bad** 121:1 131:20  
179:5 180:3  
**Bahar** 176:6

**Bahrain** 104:17  
**Barcelona** 104:24  
**Barry** 58:24 58:25  
60:2 70:24 72:13  
72:20 106:1 109:15  
109:18 110:13  
110:16 115:9  
118:11 127:13  
**base** 154:7  
**based** 16:7 25:3 25:6  
41:14 57:9 77:22  
86:18 101:17  
154:16 154:16  
155:14  
**basic** 29:15  
**basically** 29:9  
107:15 130:5  
**basis** 16:2 77:23  
78:6 78:11  
100:24 113:9 114:5  
**battlefield** 131:16  
**be-all/end-all** 32:15  
**bear** 138:3  
**beating** 85:16  
**became** 29:20 30:6  
64:8 120:1 120:3  
120:6 184:25  
185:13  
**become** 28:25 29:25  
30:8 102:25 106:21  
172:20  
**becomes** 24:23  
**befall** 131:7  
135:16 136:3  
**beginning** 115:15  
**behalf** 55:4 155:10  
**behavior** 151:15  
**believe** 16:6 26:2  
32:11 32:13  
32:15 34:14 41:6  
41:15 41:22  
41:24 42:10  
42:21 42:25  
43:23 44:9 44:14  
52:22 62:1 63:2  
75:4 81:6 83:8  
83:9 85:25 86:19  
86:20 86:24  
87:13 88:8 91:1  
98:18 99:5  
101:22 103:2  
108:10 130:9  
139:18 149:19  
162:9 167:22  
170:16 188:15  
189:4 189:5

1203-4210-105



**believes** 86:21 87:1  
**belongs** 56:24  
**benefit** 58:6 96:21  
 96:22  
**Bennett** 58:24  
 58:25 60:2 70:24  
 72:13 72:20  
 106:1 109:15 110:7  
 110:13 110:16  
 111:8 111:10  
 111:11 111:17  
 112:5 112:12  
 112:19 112:25  
 115:9 118:11  
 127:13 158:19  
 159:1 172:4 175:21  
**Bernard** 41:19  
**besides** 99:15 172:21  
**best** 21:4 170:9  
**bet** 182:17 187:6  
**better** 51:21  
**betting** 187:6  
**beyond** 140:10 145:7  
**bill** 94:12 96:6  
 96:10 96:13  
 96:17 97:4 184:7  
**bit** 130:3  
**blank** 125:15  
**blockade** 188:8  
**blond** 60:24 180:1  
**blood** 108:8 160:24  
 164:14  
**bold** 27:16 108:7  
 108:13 109:3  
**boldface** 107:20  
**B-O-L-I-N-G** 8:18  
**Bolinger** 8:18 8:18  
 18:7 18:9 37:1  
 37:4 46:7 46:13  
 46:21 49:12  
 49:18 62:22 69:5  
 104:2 123:16  
 123:19 123:24  
 124:3 168:2 168:5  
**book** 30:20 31:24  
 32:5 32:9 32:13  
 32:15 32:16  
 32:20 32:22  
 32:24 33:1 38:25  
 39:3 39:7 39:8  
 39:9 98:16  
**books** 15:25 30:16  
 30:18 30:22  
 31:12 31:14  
 31:14 32:20  
**born** 14:21  
**bother** 169:20 169:25  
**bothers** 170:9  
**bottom** 69:16 69:20  
 91:16 91:20  
 91:21 91:22 98:11  
**bought** 110:6  
**Boxtape** 176:16  
**B-O-Z-T-E-P-E** 176:17  
**brackets** 164:8  
**Braun** 107:6  
**bravely** 30:5  
**break** 61:12 105:11  
 156:4  
**Brey** 8:22 8:22 11:20  
 12:15 16:20 17:6  
 17:9 17:14 18:20  
 20:17 20:24  
 21:15 23:16 25:9  
 37:7 37:16 39:23  
 40:23 44:2 44:8  
 44:18 45:2 45:4  
 45:8 45:12 45:13  
 47:8 47:14 47:16  
 48:3 52:3 53:12  
 54:1 54:6 56:16  
 56:22 57:18  
 57:23 58:17 61:9  
 61:12 63:6 63:15  
 68:21 69:1 69:4  
 69:7 69:11 72:6  
 72:9 72:12 72:17  
 72:20 75:4 76:7  
 76:14 76:19 77:7  
 78:12 78:15 80:5  
 80:13 80:17  
 81:22 82:1 82:17  
 84:9 84:12 85:3  
 85:7 85:13 86:17  
 87:22 88:25 89:4  
 89:6 99:23 101:9  
 101:15 102:2 102:8  
 102:17 103:24  
 104:4 105:12  
 105:16 108:10  
 111:16 112:19  
 112:25 113:2 113:6  
 113:10 113:14  
 113:23 114:3  
 121:20 122:1  
 123:18 124:14  
 124:16 126:1  
 126:10 126:18  
 127:1 127:12  
 135:10 135:18  
 136:18 137:13  
 139:20 139:24  
 140:10 142:6  
 142:12 143:5  
 144:24 145:2 146:2  
 146:6 146:24 147:6  
 147:12 149:3 149:5  
 152:3 155:18 156:4  
 159:15 159:19  
 162:11 163:1  
 163:18 163:22  
 166:13 169:10  
 169:14 169:24  
 170:6 170:15  
 170:19 171:1 171:8  
 172:14 175:11  
 177:16 177:22  
 178:1 178:6  
 178:9 178:12  
 178:19 180:10  
 181:8 184:19  
 184:22 185:8  
 189:14 189:21  
**B-R-E-Y** 8:22  
**bribe** 107:19 161:1  
 161:9 161:11  
 161:14  
**bribes** 101:23  
 103:6 103:8  
**briefing** 151:1  
**briefings** 64:14  
**bring** 97:12 109:8  
 111:20 138:3 178:2  
**bringing** 106:20  
 115:7 115:14  
 149:23  
**brochure** 47:19  
 48:4 48:8  
**broke** 18:13 61:20  
 89:12  
**brought** 22:3  
 111:22 118:12  
 125:19 130:19  
 136:12  
**Bruce** 8:24 82:21  
 83:7 84:24 85:24  
 86:5 110:24 153:11  
 175:2  
**brunette** 60:24 60:25  
 180:1  
**building** 183:14  
**Bulgaria** 104:25  
**buried** 124:21  
**Burton** 98:8  
**Bush** 130:23 130:23  
**busy** 112:2  
**Bye-bye** 46:24

UNIVERSITY MICROFILMS

4074700440014

C		
<b>Cafe</b> 65:13 68:14	<b>case</b> 8:12 10:9 10:24	132:7 157:13
89:13 91:25 145:17	10:25 11:3 11:9	175:20 186:7
171:22 173:1	12:16 12:16	<b>children</b> 164:16
<b>Calamity</b> 14:4	12:20 12:24 13:4	<b>chose</b> 54:10 181:16
14:14 14:25	17:24 21:2 48:25	181:17
15:11 21:11 24:25	74:1 113:11 119:20	<b>Chris</b> 17:9 37:2
<b>calendar</b> 65:19 65:22	120:1 120:4 123:10	45:12 79:12
180:15 183:7	140:11 142:14	82:10 102:3 122:10
187:20 187:25	170:3	128:5 143:5 143:19
188:14	<b>cases</b> 10:11 10:13	153:7 167:8 167:10
<b>campaign</b> 52:7 52:8	10:14 11:5 12:14	167:12
52:9 58:1 58:2	12:18 74:3 134:23	<b>Christian</b> 108:8
58:5 58:15 58:23	<b>casualties</b> 146:18	160:25 164:9
59:5 59:10 59:15	<b>Caucus</b> 116:8	<b>Christopher</b> 8:16
59:18 59:20	116:10 116:12	<b>church</b> 107:1
59:22 59:25 60:3	116:16 116:25	<b>Cincinnati</b> 183:16
60:16 61:2 61:5	117:8 118:2	<b>circumstance</b> 168:23
62:5 62:17 64:2	171:7 171:13	<b>circumstances</b> 9:23
65:4 65:15 65:25	171:25 172:19	10:1
66:4 66:8 67:2	172:20 173:4	<b>citing</b> 77:6 99:4
67:11 67:12	173:14	99:6
67:13 67:14	<b>caucuses</b> 116:13	<b>citizens</b> 26:6
67:20 67:23	117:1 117:12	64:18 96:22
89:18 89:24	<b>cause</b> 173:15 173:18	<b>City</b> 156:14
89:25 91:7 91:11	<b>Center</b> 153:1	<b>civil</b> 23:8
91:13 92:21	<b>certain</b> 75:1 94:20	<b>claim</b> 77:24 78:18
92:23 99:3 99:13	97:22 126:15	<b>claimed</b> 76:18 77:18
100:16 100:23	137:25 166:5	<b>claiming</b> 134:7
100:24 101:6	<b>certainly</b> 87:14	<b>claims</b> 83:2 83:4
101:18 103:18	<b>certified</b> 43:12	<b>clarification</b> 108:10
103:19 105:25	46:11 47:6 55:20	<b>clarify</b> 15:22
106:7 106:8	56:3 56:17	17:11 17:15
106:8 113:15	112:24 113:20	<b>classified</b> 135:1
113:17 113:18	<b>certify</b> 57:12	<b>clause</b> 141:22 143:23
114:19 121:6	113:4 114:8 114:13	<b>cleansing</b> 34:1
121:15 125:4	<b>cetera</b> 121:19	34:2 34:11
126:11 127:13	<b>change</b> 89:3 141:17	<b>clear</b> 33:25 88:21
129:8 153:25 157:1	147:22 148:12	132:20 143:22
158:3 159:8 161:23	148:13	164:4 173:24 174:1
162:18 164:19	<b>changed</b> 143:9 143:12	174:3
164:21 168:15	147:21 147:24	<b>clearer</b> 24:16
171:23 176:14	149:16 185:4 185:9	<b>client</b> 11:15 56:24
176:19 179:12	<b>characterize</b> 33:2	56:25 125:16
<b>campaigns</b> 58:3 61:23	108:17	<b>Clinton</b> 130:23
61:24 99:19	<b>charge</b> 13:8 58:3	<b>closer</b> 112:22
100:5 106:1 107:8	60:3 60:6	<b>Coalition</b> 41:5
<b>camps</b> 24:2	<b>charges</b> 114:10	81:1 88:6 128:4
<b>Canada</b> 105:1	<b>check</b> 45:25 176:19	128:13 153:24
<b>candidacy</b> 173:3	<b>checks</b> 46:19 67:19	154:5 154:14
<b>candidate</b> 104:12	92:25	155:13 164:25
182:24	<b>Chicken</b> 180:11	181:4
<b>care</b> 111:17	<b>chief</b> 26:24 27:8	<b>CODEL</b> 122:13
<b>careful</b> 135:20	58:22 105:25 106:5	<b>coincide</b> 26:13 26:16
<b>cars</b> 107:1	109:14 116:1	26:18
	118:11 122:15	<b>coincided</b> 26:15
	130:11 130:18	

<b>college</b> 59:7	106:23 107:11	119:13 122:5
<b>colloquial</b> 167:17	107:17 108:3 109:8	129:25 130:20
<b>Columbia</b> 105:2	110:6 111:22 112:7	130:24 131:25
<b>Columbus</b> 67:24 67:25	112:21 115:3 115:3	132:21 133:8
<b>coming</b> 104:23	115:4 115:7 115:14	133:15 133:24
<b>comment</b> 18:1	115:18 115:25	134:18 134:22
<b>comments</b> 18:2	116:4 116:6 121:24	137:2 137:22 139:4
<b>Commission</b> 8:12	125:15 152:25	139:14 139:15
10:24 11:9 12:19	160:13 163:11	140:6 140:17
12:21 13:18	163:14 164:13	140:25 140:25
14:16 36:20	169:3 175:17	141:6 142:9 142:10
51:15 51:18	<b>complete</b> 28:16 34:19	142:11 142:19
52:20 54:4 55:5	51:20 105:3 124:7	142:20 143:18
55:9 55:17 55:22	<b>compliant</b> 17:1 49:10	143:22 144:4 144:5
56:9 56:20 77:5	153:21	144:21 144:22
79:2 79:19 80:10	<b>Complies</b> 9:4	145:3 145:5 145:21
85:12 107:12 109:8	<b>components</b> 66:8	145:25 146:4 146:7
109:16 110:18	<b>comport</b> 43:7	147:25 151:19
111:2 111:5	<b>compound</b> 13:19	161:7 161:13
<b>commit</b> 94:18 94:19	<b>computer</b> 169:6 169:7	161:17 161:25
<b>committed</b> 161:24	180:16	162:3 162:5
<b>committee</b> 117:23	<b>concern</b> 93:2	173:5 173:22
122:5 122:14	<b>CONCLUDED</b> 189:23	174:17 174:18
126:12 127:9	<b>conclusion</b> 151:4	174:23 184:21
133:20 133:22	<b>conclusions</b> 41:18	184:22 185:6
140:13 140:22	<b>conditions</b> 166:5	189:10
164:21 183:8	<b>conduct</b> 147:11	<b>congressional</b> 59:9
187:10	<b>conducting</b> 147:20	59:15 59:21
<b>committees</b> 127:6	148:6	59:23 62:17 64:2
164:15 164:20	<b>confar</b> 105:14 178:17	67:10 94:7 96:1
<b>communicate</b> 110:11	189:12	106:10 106:17
<b>communicated</b> 142:8	<b>conference</b> 46:16	112:6 118:6
<b>communication</b> 57:5	<b>conferred</b> 12:7	119:9 121:6 122:13
77:20 109:20	<b>confidence</b> 133:1	125:5 156:25 158:2
109:21 110:13	<b>confidential</b> 134:5	159:9 162:4
122:18 122:19	<b>confidentiality</b>	<b>congressman</b> 174:15
<b>communications</b> 77:22	133:11	174:18
79:14 79:17 109:12	<b>confines</b> 133:5	<b>Congresswoman</b> 8:23
113:24	184:12	8:25 41:10 41:14
<b>communities</b> 63:22	<b>confirm</b> 63:12	41:23 71:9 81:5
<b>community</b> 90:20	<b>confused</b> 183:3	86:18 88:7 91:25
90:24 91:10	<b>confusing</b> 13:20	98:14
98:23 188:6	<b>Congress</b> 27:17 31:10	<b>conjunction</b> 94:1
<b>company</b> 67:16	31:13 40:11	123:9
67:17 67:18 68:2	41:13 64:9 64:12	<b>connection</b> 73:22
69:22 70:9	64:21 69:20	154:4 154:14
159:25 160:3	69:23 70:8 72:24	155:12 155:16
<b>compile</b> 53:23	93:15 93:19 95:5	155:25 172:10
<b>complaint</b> 14:17 17:7	95:12 96:7 96:17	<b>consequences</b>
21:14 21:16	96:25 98:2 98:15	131:20 132:2
30:13 36:12	98:17 98:21 100:23	135:15 136:2
36:16 36:19 37:2	104:8 104:13	136:14
49:8 49:15 49:16	104:16 112:3	<b>consideration</b> 143:12
49:17 50:4 50:6	115:22 116:8	<b>considered</b> 30:17
51:2 76:22 77:11	117:23 118:2 119:7	<b>consistent</b> 44:20
78:17 78:19 106:21		44:21 83:20

007-1101-1-10001-1

85:18 85:20 86:23	184:11 185:16	184:23 185:6
constituent 186:16	185:19 187:14	189:13
constituents 187:7	conversations 57:4	counsels 17:13
constitute 23:14	93:3 110:15 111:12	countries 104:15
35:3 41:17 41:25	119:25 143:16	115:20 137:24
42:17 43:2 56:19	143:21 146:1	138:5
81:8 83:8 88:10	157:23 157:25	country 26:14
constituted 19:12	158:2 158:5	29:25 120:25
19:13 86:19	162:2 162:6 162:17	138:12 148:17
constitutes 43:25	185:5 185:12	170:11
constitution 30:8	185:16	county 178:12
148:18	convicted 23:25	couple 34:3 36:15
contact 64:1 65:15	convincd 49:2	92:16
65:16	convoluted 35:25	course 13:24 127:15
contacted 64:25	coordinated 35:19	court 9:2 9:5 9:10
contacts 63:21	copied 73:11	13:7 41:18 42:14
contents 153:17	copies 37:7 69:6	46:11 48:14 58:6
contast 13:2	134:21 139:13	78:2 82:4 82:6
context 47:17 96:1	153:7 164:22	82:9 124:13 124:15
107:21 107:25	167:25 168:8	124:17 124:19
108:5 108:14	177:15	124:22 127:3
108:25 109:1 120:8	copy 36:21 51:6 51:6	149:23 180:8
150:16 150:20	68:22 69:2 108:3	180:11
151:10 161:12	159:5 159:13	cover 185:22
184:13	Corner 9:20	covered 159:15
continually 88:14	Corporation 154:4	159:20
88:14	correct 11:10	cover-up 35:5
continue 168:12	12:11 15:3 15:17	create 13:17 134:9
continues 35:4	19:6 21:25 26:9	created 30:9 175:2
continuing 35:2	26:14 48:21	crime 23:25 48:18
181:8	53:20 65:23	169:8
contribute 73:24	82:13 82:14	cross 132:16
91:13	82:15 95:7	crossing 132:17
contribution 66:23	106:10 110:20	cross-talk 101:4
125:5 126:21 176:4	112:13 114:6 116:3	current 61:2 148:20
contributions 50:8	126:25 127:7 128:1	currently 161:25
50:10 50:14 52:6	133:12 134:15	Curt 8:20 8:20
52:8 52:9 55:8	146:23 147:11	86:7 87:7
73:8 73:21 89:21	153:13 154:1 162:5	customary 134:21
100:16 121:14	188:3 188:21	186:15
127:5 127:11	corrected 182:5	cycle 58:4 90:21
127:22 153:25	correctly 57:16	90:25 127:23 128:6
161:23 162:18	correlation 173:11	129:9
164:19 172:11	Corosovo 104:20	
172:15 174:21	cost 146:17 148:6	
176:10	148:14	
contributor 77:2	Coughing 175:18	
conversation 95:10	council 74:12	
95:16 95:19	74:17 75:16	
96:18 97:7 97:8	counsel 8:14 8:20	
97:15 97:19	8:22 8:24 17:12	
110:7 118:20 135:4	55:25 56:1 57:4	
136:9 136:10	57:5 77:17 77:20	
137:14 145:7 146:3	77:22 82:19 105:14	
146:13 152:15	110:17 114:6 145:5	
152:21 184:2	146:8 178:17	

D

Daily 25:15 27:21  
Dan 98:8  
Darfur 188:8  
188:11 188:13  
188:16 188:19  
188:19 188:23  
188:25 189:6  
189:10 189:11  
darkened 108:7  
database 53:19

14005430001

<b>date</b> 67:8 68:17 71:10 102:15 102:16 111:21 157:5 175:4 181:9 188:21	<b>denial</b> 35:2 35:5 35:15 36:6 80:23 99:4 161:6	<b>died</b> 22:20 32:18
<b>dated</b> 71:13 81:1 102:6	<b>denied</b> 37:25 38:4	<b>difference</b> 177:19
<b>dates</b> 117:13 173:6 183:4	<b>denies</b> 83:10	<b>different</b> 12:8 36:13 44:10 59:19 61:8 70:23 84:4 95:13 95:15 120:11 138:5 143:23 143:25 147:14 148:2 151:15 170:11
<b>David</b> 8:11 8:17 8:19 182:24	<b>Dennis</b> 151:22 152:9 152:18 152:19	<b>differentiated</b> 95:9
<b>day</b> 8:8	<b>deny</b> 35:19 36:14 108:8 160:24 164:7 164:15	<b>differently</b> 76:16 150:23 151:8 151:10 151:11
<b>days</b> 179:21 179:21	<b>denying</b> 161:16	<b>dig</b> 90:11
<b>DC</b> 67:21	<b>Department</b> 64:15 64:15	<b>dinner</b> 92:16 93:2 93:16 181:5 182:11 182:12
<b>dead</b> 108:18	<b>depending</b> 66:21 95:8	<b>direct</b> 9:13 163:4 165:12
<b>deal</b> 33:24 76:20 138:9 178:1	<b>depends</b> 70:22 85:21 86:5 134:24 150:9 150:11 150:13 150:13 150:20 158:21 162:9	<b>direction</b> 61:8 67:1
<b>dealing</b> 11:9 42:17 138:13 140:11	<b>depose</b> 72:14 127:18	<b>directly</b> 67:16 92:25 138:4 138:17 144:18 169:15 175:25
<b>deals</b> 79:14 80:22	<b>deposed</b> 10:14 10:14 11:1 11:6 12:11 12:13 12:17 12:17	<b>disclaimer</b> 69:19 69:20
<b>death</b> 24:2 34:22	<b>deposition</b> 8:10 9:15 9:21 10:8 10:16 11:5 12:7 17:12 17:16 33:14 62:15 63:4 113:7 189:22 189:23	<b>disclose</b> 132:14
<b>deaths</b> 23:7 108:17	<b>depositions</b> 10:4 10:10	<b>discovery</b> 49:11 49:12 49:13
<b>debate</b> 27:17 132:15 137:3 141:22 142:4 143:20 143:23 153:2 173:25	<b>describe</b> 50:11	<b>discursion</b> 135:22
<b>debated</b> 40:11	<b>description</b> 43:14 43:15	<b>discuss</b> 78:11 96:9 132:14 169:9 182:23 186:12
<b>decided</b> 13:2 68:9 68:10 109:7 141:1 141:7 141:8 141:14	<b>desirous</b> 173:2	<b>discussed</b> 94:7 95:16 158:8 182:20 184:16 188:23
<b>decision</b> 141:13 146:16 146:21	<b>desk</b> 69:6 124:6 168:9	<b>discussing</b> 184:9
<b>declare</b> 79:22	<b>details</b> 122:11	<b>discussion</b> 45:16 114:12 147:15 151:17 163:7 167:23 169:18 174:10 177:4 178:3 181:25
<b>deemed</b> 48:13	<b>deterioration</b> 137:20	<b>discussions</b> 133:3
<b>defeat</b> 182:23	<b>determine</b> 23:11 40:15 43:10 48:17 49:7 88:15 174:9	<b>dishonest</b> 83:14
<b>Defence</b> 128:14	<b>develop</b> 68:12	<b>district</b> 95:25 176:11
<b>defending</b> 17:12 17:16	<b>developed</b> 25:5 63:21 65:15	<b>divine</b> 54:4
<b>Defense</b> 64:14 128:17 128:19	<b>developing</b> 66:13	<b>document</b> 25:19 25:25 36:17 36:18 39:16 39:17 39:21 40:22 41:3 41:9 49:21 49:25 50:17 50:18 50:23 51:17
<b>define</b> 167:12	<b>dial</b> 46:13	
<b>definitely</b> 45:24	<b>Dick</b> 152:13 152:18 152:19 152:22	
<b>definition</b> 33:23 34:1 38:10 39:13 39:19 48:22 161:10	<b>dictated</b> 27:10	
<b>definitive</b> 38:13	<b>die</b> 16:16 16:16	
<b>definitively</b> 10:13 116:5 154:13		
<b>deliver</b> 122:17		
<b>demand</b> 85:19		
<b>demeanor</b> 187:17		
<b>Demir</b> 114:16 164:24		
<b>D-E-M-I-R</b> 164:24		

51:20 51:22	draconian 130:8	11:9 12:15 12:18
51:23 52:2 54:5	131:4 131:19 132:2	12:21 13:18
68:20 70:10 78:6	135:15 136:2 136:8	14:16 36:20
78:21 79:18	draft 27:3 27:6	45:10 51:15
84:15 88:3 90:15	115:3	51:18 52:20 54:4
90:17 90:22	drafted 115:4 175:18	55:4 55:9 55:17
91:18 102:11 108:6	187:20 187:22	55:22 56:9 56:20
123:9 123:10 124:1	187:24	107:12 109:8
124:4 125:2 125:10	drafting 115:2 115:8	109:16 110:18
126:10 134:4	115:15	111:2 111:5
143:10 143:10	drafts 175:20	else 26:23 27:1 30:1
163:19 178:13	driveway 151:13	32:23 34:8 59:4
178:15 187:21	Drs 180:19	70:25 75:21
documents 56:2 62:13	Drugs 179:6	79:24 89:25 92:4
72:21 122:15	duly 155:2	92:9 109:19 110:25
122:16 122:18	during 14:18 14:19	115:13 116:4
126:2 126:15	15:13 19:14	130:19 135:21
126:19 126:20	19:15 19:16	157:16 159:2 180:2
127:15 127:16	32:18 164:17	184:17 184:20
127:19 132:10	duties 106:18	185:5
132:12 132:22	dying 188:17	e-mail 18:8 18:9
132:23 132:24	<hr/>	70:3 70:6 71:2
133:2 133:10	E	71:11 71:13
133:11 134:1 134:9	<hr/>	71:19 72:3 98:5
177:22	earlier 117:17	98:13 102:6 103:13
dollars 121:6	148:16	106:13
domestic 123:3	early 24:20 116:11	E-mails 74:3 89:15
Don 11:14 18:18	171:17	embraces 20:21
20:12 37:15	East 41:19 104:20	emerge 65:17
45:12 62:23 72:5	easy 57:19	emerged 65:19
79:24 80:4 104:2	edited 26:24 27:3	emotions 139:1 139:1
123:13 125:13	editorial 26:11	Empire 14:2 14:13
127:10 134:7 178:4	26:19	18:15 21:9 164:10
Donald 8:22	effect 130:8	encourage 101:7
donate 91:10 103:19	141:11 173:18	116:25 117:8
donated 92:22 164:21	effectively 84:24	encouraged 117:1
donation 66:23 66:23	effectuate 146:22	engage 96:18
98:25	effort 47:23	engagement 113:22
donations 99:3	either 11:16 22:11	England 105:1
100:24 101:6	31:16 31:16	entire 32:16 121:22
101:18 104:8	31:16 34:1 56:25	entirely 85:10 95:6
done 47:22 97:24	64:1 66:22 78:5	entitled 113:25
107:22 123:10	83:9 86:20 100:9	entity 127:24
161:14	104:6 116:11	entry 180:14
donor 66:4 179:12	122:16 126:13	180:15 183:7
donors 66:4 66:18	127:7 158:6 166:10	187:20 188:1
101:7 101:19 125:6	181:21	environment 78:10
157:20 165:16	elected 64:8 110:8	equivocal 87:4 87:4
165:21 176:3	election 58:4	equivocating 87:6
dot 81:6 81:6 81:6	90:20 90:25	E-R 8:19
dots 108:21	98:20 106:24	es 164:7
doubly 164:11	107:23 110:4 112:1	escort 179:20
downs 137:1	112:22 127:22	especially 108:17
dozens 96:24	128:5 129:9 180:18	essentially 19:18
Dr 180:22 180:25	181:5 182:4	125:7 136:14
182:15	Elections 8:12 10:24	

100-11101-100

<b>established</b> 81:3	66:6 123:21 124:1	125:14 126:3 126:7
<b>et</b> 121:19	<b>evidence</b> 51:14 53:13	139:9 139:10
<b>ethically</b> 117:24	54:8 169:16	142:12 152:23
167:3	170:2 172:15	153:5 163:16 165:2
<b>Ethics</b> 117:23	<b>evidentiary</b> 84:5	170:25 171:2
122:5 122:14	<b>evidently</b> 152:6	171:12 177:16
<b>Ethiopia</b> 105:9	<b>evolved</b> 136:25	180:5 180:12 182:7
<b>ethnic</b> 34:1 34:6	<b>exact</b> 67:8 111:21	183:1 183:3
<b>evening</b> 93:12 180:19	117:13 117:13	<b>exhibits</b> 36:25 55:13
180:24 182:16	117:22 127:25	57:16 139:12 169:2
187:9 187:16	128:9 155:22 175:4	<b>exist</b> 119:1 159:20
<b>event</b> 16:5 16:15	<b>exactly</b> 15:16	<b>exists</b> 172:19
19:11 20:9 22:2	83:25 111:18	<b>expanded</b> 15:6
29:14 35:3 48:13	126:12 136:11	<b>expenses</b> 114:16
65:14 65:21 66:2	141:24 144:16	114:17
66:2 68:14 73:23	186:1	<b>experience</b> 25:11
74:12 75:16	<b>EXAMINATION</b> 9:13	<b>experiences</b> 24:5
75:20 76:1 89:18	<b>example</b> 22:18 23:6	<b>expert</b> 138:7 138:8
89:21 89:22	<b>Excel</b> 49:23	138:23
90:11 92:13	<b>except</b> 111:10 112:12	<b>explain</b> 132:5 155:3
92:20 95:1 96:19	159:22	<b>explained</b> 132:6
97:16 97:21	<b>exception</b> 62:23	<b>explanation</b> 174:24
97:25 98:6	<b>exchange</b> 161:23	<b>extent</b> 166:14
145:21 156:12	162:18 163:5	<b>extraordinarily</b>
157:2 157:12	<b>exchanged</b> 57:16	116:20 130:6
157:24 158:8	<b>excluded</b> 53:10	184:25
158:13 159:3	<b>excludes</b> 53:4	<b>extremely</b> 85:11
171:25 180:19	<b>excluding</b> 33:25	<b>eye</b> 138:4 138:17
181:3 181:20 182:3	<b>Excuse</b> 175:18	
182:19 182:23	<b>execution</b> 66:1	<b>F</b>
<b>events</b> 14:1 14:9	<b>exemption</b> 106:2	<b>face</b> 120:16 138:13
14:13 15:7 15:11	<b>exhibit</b> 25:14	<b>fact</b> 13:2 35:4 35:15
18:14 19:22 21:9	25:24 36:11	35:19 39:23
21:13 22:11	36:24 37:22	47:25 48:14
22:14 22:16	37:23 39:10	48:24 48:24 49:2
22:20 23:14	39:11 40:21	54:21 70:4 77:3
23:20 24:24	40:24 41:1 47:2	78:15 78:15
28:12 28:17	49:20 49:22	79:16 91:5 99:2
28:19 28:23 29:9	49:22 49:23 50:3	99:6 101:14
29:10 29:10	50:6 50:18 50:21	103:5 104:6 104:10
30:10 35:5 41:15	50:23 51:19	128:11 131:25
41:24 42:11	51:24 52:1 54:14	132:4 143:6 148:21
42:16 43:1 43:7	54:20 54:21	154:8 154:19
43:23 48:6 48:25	54:22 54:25	161:16 162:1 169:8
81:7 83:8 88:8	54:25 55:1 55:23	170:20 187:2
94:25 95:4 97:3	56:8 57:15 62:10	188:25
97:13 148:1 166:14	62:13 63:7 63:8	<b>facts</b> 15:20 15:24
173:12 173:18	68:19 76:24	19:3 21:24 22:6
184:14 188:19	76:24 79:4 88:3	22:7 22:9 53:13
<b>everybody</b> 52:24	88:4 90:14 90:16	54:8 101:11 101:17
59:24 105:22	90:19 91:14	101:19 119:1
<b>everyone</b> 20:20 164:4	91:16 98:4 102:8	169:15 170:2
<b>everything</b> 19:25	103:21 103:24	<b>factual</b> 100:22
20:14 32:19	108:11 108:11	<b>failed</b> 108:20
32:21 62:21 63:2	108:12 124:7 124:8	<b>fairly</b> 87:12 87:16
63:3 63:13 66:5	124:11 124:25	88:11 179:12

<b>fall</b> 135:21 136:9	134:16 134:20	44:24 45:5 45:7
<b>false</b> 11:9 12:24	141:22 142:2 142:5	45:11 45:12
56:23 83:11 101:24	143:19 153:7 153:9	45:21 46:2 46:6
101:24 107:20	153:12 167:12	46:8 46:12 46:23
164:1 164:6 164:11	167:17 175:3 175:5	46:25 47:11 49:9
164:18 165:14	175:9 179:4	49:14 49:19 51:5
<b>falsely</b> 37:13	179:6 184:21	53:17 54:12 57:7
<b>familiar</b> 35:21 120:5	<b>F-E-I-N</b> 8:24	57:12 57:21
128:11 129:7	<b>Fein's</b> 42:6 82:11	57:24 58:20
153:10 153:17	82:17 82:21	61:14 61:19
<b>family</b> 121:5	84:24 86:6 86:17	62:20 62:25 63:8
<b>fashion</b> 13:15 126:16	87:11 88:13	63:11 68:24 69:2
<b>Fat</b> 60:22	<b>fellow</b> 90:2 179:11	69:9 69:13 72:5
<b>fate</b> 131:6	<b>Fettulah</b> 120:19	72:7 72:11 72:15
<b>favor</b> 93:20 93:24	120:23 121:4	72:19 72:22 76:3
94:5 94:10 94:11	<b>fifth</b> 24:9	76:10 76:17
94:13 94:14	<b>figure</b> 15:9 19:24	76:20 77:1 77:25
94:17 94:19	20:11 29:16 36:4	78:14 79:13 80:8
95:10 95:11	<b>file</b> 78:16 78:19	80:20 81:25 82:4
95:13 95:15	107:17 112:1	82:13 82:15 84:1
95:18 95:19	127:16	84:3 84:11 84:13
<b>favors</b> 93:18 95:21	<b>filed</b> 55:4 110:21	85:2 85:4 85:8
95:25	117:23	87:7 87:18 87:24
<b>FBI</b> 154:10	<b>files</b> 159:6	88:1 88:19 88:23
<b>fear</b> 149:12 149:15	<b>filling</b> 55:9 78:24	89:11 90:10
<b>feasibility</b> 110:9	107:11 112:21	90:13 99:25
<b>feasible</b> 109:9	<b>final</b> 48:20 49:3	100:2 102:4 102:12
<b>February</b> 68:15	<b>finding</b> 48:14	102:22 103:22
73:2 89:13 98:5	48:20 49:4	104:5 105:10
145:17 156:13	<b>fine</b> 11:18 11:24	105:13 105:21
171:24 172:11	18:23 34:20	113:4 113:8 113:13
172:25 173:12	36:23 36:24 37:6	114:1 114:4
<b>FEC</b> 126:21 127:16	80:21 85:2 85:5	114:8 114:9 114:13
159:23	86:14 86:15	121:25 123:13
<b>federal</b> 106:2	87:18 117:15 118:5	123:17 123:20
<b>feel</b> 71:5 71:5 117:2	178:20 185:21	123:25 124:5 124:9
169:25 170:20	<b>finish</b> 13:9 13:10	124:12 124:18
<b>feeling</b> 47:10	21:17 21:18	124:20 124:23
<b>fees</b> 114:11 114:15	42:13 44:3 59:14	125:13 125:21
<b>Fein</b> 8:24 8:24 15:22	136:17 136:18	126:6 126:17
16:7 17:5 17:8	173:17	126:24 127:2 127:4
27:1 37:7 41:7	<b>Finney</b> 8:16 8:16	127:10 127:20
41:23 43:4 43:14	9:12 9:14 11:14	128:7 128:25 134:7
43:22 47:2 81:3	11:22 12:4 15:23	134:15 134:17
81:5 82:11 83:7	16:1 16:8 16:23	135:3 135:14
84:7 84:9 84:12	17:17 17:20	135:25 136:22
84:13 84:14	17:25 18:5 18:11	137:16 137:19
85:24 86:11 101:25	18:12 18:18	139:25 140:12
102:3 102:9 102:18	18:23 20:12	141:25 142:3 142:7
103:20 103:23	20:22 21:5 21:7	142:16 144:1 144:2
104:22 110:24	21:17 21:20	145:4 145:8
111:6 111:10	36:19 36:23 37:3	146:5 146:10 147:4
112:19 113:1	37:5 37:10 37:12	147:7 147:8
113:14 119:15	37:15 37:20 40:1	149:7 152:5
119:25 128:5	40:2 40:24 41:2	152:7 153:8 153:10
128:12 134:13	44:3 44:5 44:15	156:5 156:10
		159:13 159:17



1774910544051

159:24 163:8	<b>forgot</b> 105:8 151:6	71:8 72:1 89:13
163:23 166:16	<b>forgotten</b> 27:25 28:4	91:24 92:24 94:5
166:17 167:16	160:10	94:8 96:2 96:10
167:18 167:24	<b>form</b> 148:21	96:11 96:12
168:4 168:7 168:11	<b>formal</b> 74:14 74:16	96:16 97:6
168:13 169:12	<b>formed</b> 109:12	145:17 171:22
170:4 170:12	<b>former</b> 151:19	173:1
170:18 171:3 171:4	<b>formulate</b> 186:14	<b>fundraisers</b> 65:9
172:17 172:23	<b>formulated</b> 140:5	65:12 66:15
175:12 177:14	140:16 173:21	96:23 96:24 97:2
177:21 177:24	<b>forth</b> 164:12	97:11 126:15
178:4 178:8 178:11	<b>forward</b> 139:2 140:21	184:14
178:14 178:20	187:18	<b>fundraising</b> 53:19
179:1 179:5	<b>forwards</b> 151:14	58:1 60:6 60:7
179:7 179:9 179:10	<b>fought</b> 30:5	66:8 67:2 68:9
180:7 180:9 180:13	<b>foundation</b> 149:6	68:10 94:24
185:2 189:12	169:11 170:17	94:25 95:4
189:15 189:20	175:11	<b>funds</b> 63:22 102:25
<b>F-I-N-N-E-Y</b> 8:17	<b>fourteenth</b> 102:20	
<b>firm</b> 8:7	<b>fourth</b> 24:6 24:10	<b>G</b>
<b>first</b> 12:15 13:25	41:8 50:17 50:24	<b>gather</b> 38:17 38:19
16:24 17:6 23:24	51:10 87:23	<b>gathered</b> 22:7
24:19 29:21	<b>fowl</b> 135:21	23:10 149:14
30:24 45:8 56:22	<b>frame</b> 101:25 172:6	<b>gee</b> 81:16
61:22 63:12 64:1	188:22	<b>general</b> 66:3
64:22 76:20	<b>frankly</b> 79:5 142:6	118:24 135:7
76:22 98:12	170:2	150:10 150:25
98:13 102:6 109:19	<b>free</b> 71:5	<b>generally</b> 16:6 21:12
109:21 123:14	<b>friend</b> 107:4	58:2 65:24
160:22 169:22	183:16 183:18	122:15 122:16
170:23 173:6	183:24	<b>generals</b> 148:2
174:11	<b>friendly</b> 146:11	<b>generates</b> 66:16
<b>five</b> 71:17 129:17	<b>friends</b> 65:6 65:7	<b>genocide</b> 14:3
181:12 181:19	71:3 71:25 72:24	14:14 14:25
186:24	72:25	16:18 17:2 18:16
<b>five-five</b> 60:21	<b>front</b> 10:20 10:23	19:1 20:1 20:5
<b>flag</b> 156:2	36:22 63:9 69:6	20:19 21:11
<b>flags</b> 155:17	78:25 102:5	24:25 25:7 27:13
<b>flipped</b> 51:1	124:6 144:13	27:18 30:12
<b>floor</b> 131:24	144:14 145:11	30:18 30:24
140:17 140:19	168:9 188:14	31:13 32:1 32:12
140:25 142:21	<b>full</b> 9:17 9:19 14:23	33:6 33:17 33:18
143:7 143:11	15:2 15:10 16:25	33:19 34:5 34:22
<b>flow</b> 165:12	17:9 18:25 19:19	35:3 35:4 35:14
<b>focus</b> 112:3	19:21 20:3 20:6	35:15 35:16
<b>folded</b> 123:19 123:20	21:22 51:5 62:20	35:23 36:7 36:7
123:21	87:16	36:14 37:25 38:5
<b>folks</b> 64:10 188:16	<b>fumbling</b> 35:9	38:9 39:13 39:19
<b>follow-up</b> 159:14	<b>function</b> 95:20	40:5 40:11 40:15
<b>food</b> 123:2	<b>functions</b> 59:9 59:10	41:17 41:25 42:1
<b>force</b> 44:16 86:3	60:1	42:5 42:17 43:3
<b>forcibly</b> 34:23	<b>Fund</b> 128:14 128:17	43:11 43:19
<b>foreign</b> 64:19	128:19	43:20 43:21
166:6 167:14 188:8	<b>fundraiser</b> 61:3 65:8	43:25 44:7 47:4
<b>forget</b> 28:19 28:22	66:24 71:4 71:8	47:13 48:2 48:7
131:19 160:7 185:1		48:13 48:15

48:17 48:21	gone 59:6 140:18	74:15 117:22 118:1
48:22 49:4 80:23	gosh 104:17	186:20
81:9 81:14 83:9	gotten 45:18 48:25	groups 144:13 144:14
86:20 88:10	140:21 165:17	145:9 145:11
88:16 98:16	165:22	145:14 145:16
98:18 99:5 99:5	government 16:16	186:16
100:11 100:15	23:7 23:11 30:9	Guenter 32:4 32:9
100:19 101:2	33:23 34:2 34:7	38:25 39:3 98:16
101:14 103:4 108:8	38:11 38:13	guess 12:25 69:14
108:17 129:23	48:23 49:2 74:21	76:21 121:1 125:13
130:20 131:6	74:23 75:2 75:7	128:20 134:8 152:4
138:12 139:5	75:10 75:14	167:25 170:19
139:23 153:3 158:8	75:18 75:25	187:12
160:25 161:6 164:9	122:8 131:22	guessing 24:18
169:9 169:18	131:23 132:19	Gulan 120:19
172:22 172:24	132:21 137:5 137:8	120:23 121:4
173:23 173:25	146:12 146:20	Gultekin 90:3 90:5
174:9 181:21	147:9 147:19	90:6 92:11 98:5
182:20 188:7	148:15 148:20	177:6
188:11 188:25	148:22 149:13	G-U-L-T-E-K-I-N 90:5
189:1 189:3	149:18 149:19	guy 91:18 127:18
189:6 189:7 189:10	149:24 150:1 150:9	176:20 179:23
189:11	150:11 150:14	guys 76:8
geographic 131:10	151:20 151:23	
131:12	152:11 154:5	<hr/> H <hr/>
Gephart 152:13	154:15 154:22	habit 180:3 181:18
152:18 152:19	155:14 156:1	Halilullah 177:17
152:22	160:16 161:4	hand 9:2 138:2
Geragos 17:20	163:12 164:17	138:21 144:18
17:22 17:24 18:4	164:20 164:22	handbill 103:9
18:8	165:9 165:13	103:10 107:18
Gerda 24:4	165:17 165:22	handed 68:24 69:9
Germany 24:13	166:4 166:11	125:24 168:25
105:1 105:1	166:21 167:21	Handing 37:6
gets 70:14 148:9	169:21 170:1	handle 66:5 66:6
getting 11:12 46:8	175:10	67:19 122:10
71:7 163:5 163:6	governments 139:1	handled 156:22
168:8 182:8 186:12	150:7 166:6	hands 35:12 164:10
gift 166:4 166:11	government's 146:15	handwritten 27:7
gifts 165:25 166:2	grade 24:10 24:20	hang 87:24
166:6 166:20	grant 78:5	happen 111:7 158:17
166:23 166:25	great 13:23 14:3	happened 14:24 15:13
167:2 167:20	14:14 14:25	15:15 16:6 16:15
gist 32:25	15:11 21:11	17:3 17:4 18:25
given 18:24 43:14	24:25 80:16 91:2	19:9 19:10 19:11
64:12 68:19	140:15	19:15 19:16
90:18 98:4	Greenberg 61:1	19:22 20:4 23:23
104:11 108:3 121:5	61:2 61:21 62:1	27:24 28:4 28:6
122:12 129:8	65:5 65:18 65:20	29:4 29:9 29:10
133:25 139:12	67:9 68:4 68:7	33:2 33:3 97:10
169:20 177:25	68:13 69:15 70:7	110:6 146:25 147:1
181:19	71:2 74:1 89:23	173:8 185:24 186:1
giving 12:10 83:17	102:23 115:1	187:3
93:9 93:12 94:5	Greenberg's 62:4	happens 35:17
100:9 100:14	grounds 142:4 142:6	69:21 140:19
gleaned 38:11 133:5	group 34:6 74:14	

11008444001

100544001

140:20	hesitate 133:3	
hard 53:8 58:7	Hey 80:3	I
102:16 160:6	Hi 17:22 73:16 76:7	I'd 11:14 19:21
hardly 115:19	high 24:20	20:12 44:24
harrowing 41:16 43:2	high-level 119:8	69:10 107:17
43:25 81:8 88:9	highly 15:25	115:10 147:23
Hartman 8:20 8:20	historian 14:22	178:17
17:11 17:15 45:6	historians 41:21	idea 10:23 60:13
57:15 57:20 86:7	historical 15:7 16:5	70:16 70:20
86:7 87:6 89:2	16:15 29:16 41:12	81:15 99:11 107:11
129:2 140:9	historically 14:10	107:14 111:2
142:4 168:10 179:8	history 15:8 19:23	115:16 115:17
Hastert 151:22	20:10 20:16 22:1	123:1 179:15
152:10 152:18	22:2 24:19 25:11	ideas 27:11
152:19	30:4 30:4 38:12	identical 113:6
hate 68:21	38:18 130:19	IDENTIFICATION 25:24
haven't 18:20 22:7	Hitler 16:9	36:11 37:23
22:7 141:7 141:8	Hittite 160:1 160:4	39:10 41:1 62:10
149:6 153:14	hoc 74:15	90:16 91:14
159:17 179:7 189:1	hold 37:6 45:17 46:8	124:8 139:9 139:10
having 10:16 34:12	46:9 78:1 78:3	152:23 170:25
61:23 71:4 71:25	78:3 82:8 87:7	180:12 183:1
115:25 130:24	Holocaust 14:4 14:15	identified 83:1
137:2 137:11	15:12 21:12	180:16
157:21 162:2 185:4	23:13 23:15	identify 8:15
head 13:12 13:13	23:23 24:4 24:11	II 16:10 47:13
header 73:14	24:12 24:21 25:1	130:23
headline 27:16	25:4 25:12	I'll 18:9 28:25
heard 23:14 24:23	honest 61:11 181:1	36:15 37:20
25:4 25:6 30:23	honestly 117:13	37:20 40:20
35:6 113:8	179:17	42:20 69:7 95:18
159:25 160:3 160:9	hope 91:1 91:3	117:5 121:20
160:10 188:18	159:17	121:20 121:20
hearing 13:18	hopefully 180:5	121:21 124:24
he'd 86:3	host 180:19	125:22 181:8
held 73:23	hostile 186:22	illegal 165:15
Hello 17:21 17:23	hotel 8:10 46:14	I'm 8:5 9:16 10:4
help 26:23 27:1	181:12	10:5 11:1 11:3
38:25 99:20 125:14	hour 92:18 92:19	11:12 14:8 14:12
147:11	hours 92:17 106:19	15:9 16:23 17:2
helped 59:15 59:17	House 130:22	17:3 17:15 17:17
60:6	134:21 140:19	19:8 19:9 19:19
helping 89:22	140:24 142:9	19:23 19:23
Here's 122:21 122:21	142:10 142:12	20:10 20:10
157:5 157:5	142:18 142:19	21:18 21:21 22:1
Heritage 129:2 129:4	143:17 144:4	22:4 22:23 23:5
155:19 165:1	144:21 145:20	24:18 25:13
hers 78:4 86:6	145:24 161:7 162:4	25:15 25:23
he's 18:6 46:8 67:13	173:21 184:3 184:7	27:22 28:16
69:22 74:5 82:22	184:9 184:16 185:6	28:20 30:11
83:3 83:5 84:3	185:17 188:7	30:15 32:7 33:7
86:1 92:8 114:24	hundred 39:5 119:1	33:24 34:15
119:20 161:8 161:9	husband 58:12 62:9	34:15 34:17
161:12 165:10	70:25 73:17 113:21	34:17 34:21 36:4
179:24 180:1		37:3 37:21 39:12
		39:17 40:21

4 7700440001

40:24 43:13	80:10	52:19 54:2 54:3
43:15 43:17	impeach 44:22	55:16 55:21
43:22 44:2 50:22	implementing 148:21	56:21 64:11 77:4
51:8 53:8 54:1	imply 71:23	79:18 80:9 83:11
54:1 54:2 54:25	importance 116:17	83:18 86:9 86:16
55:25 59:8 59:8	important 98:22	91:4 101:7
59:9 59:24 61:6	100:6 116:19 130:6	108:16 113:25
62:14 64:17	131:14	116:14 122:14
64:18 67:19 69:7	improper 163:2	126:23 134:4 151:3
70:3 70:5 71:16	inaccurate 43:16	152:2 155:15 186:5
72:17 72:19 73:7	47:3 83:13 101:5	Initially 110:21
78:1 82:9 85:24	inappropriate 97:7	inquiry 126:25 155:5
87:10 87:13 88:3	97:13 97:14	155:7
90:3 90:3 90:8	incident 28:5 28:7	insanely 164:7
90:11 90:14	Incidentally 177:16	insinuate 169:15
90:22 91:2 93:10	inclined 87:10 87:13	insist 135:8
94:11 96:9	include 54:10 55:7	insofar 159:22
100:13 100:22	79:25 127:5	instance 134:17
101:9 101:9 101:11	included 64:16	instantly 75:3
101:17 103:10	includes 35:14	instead 68:3 81:14
103:17 104:9	127:14 184:20	112:6 120:13
104:14 104:19	including 24:4	instruct 11:14 113:2
105:3 105:9 105:23	77:9 78:11	instructed 18:20
106:9 108:15 114:3	126:22 133:18	instructing 141:25
114:13 117:11	incomplete 34:20	147:4 170:4 170:6
117:22 119:2 121:1	40:14 51:23	insult 130:7 137:4
122:22 122:23	inconsistent 44:21	insulting 138:18
123:20 127:2 128:8	44:22 83:21	intended 56:7
128:13 129:22	85:17 86:25	79:19 80:10
130:12 131:11	incurred 114:11	intent 57:3 57:5
132:18 133:19	independent 41:14	77:9 77:16 77:19
134:8 134:11	47:22 47:23	77:20 78:24
134:18 134:20	Indianapolis 157:7	78:24 79:9 79:10
135:4 135:4	indicate 91:4	80:1 80:6 80:7
135:6 137:10	indicated 77:17	80:7 80:8
137:16 138:7	indicating 124:4	intention 13:16
138:11 138:23	178:13	interaction 175:23
139:11 139:20	indisputable 173:7	interchange 95:6
139:24 143:15	individual 13:1 62:2	115:11
144:10 144:19	74:9 89:20 90:8	Intercontinental
144:20 145:1 145:6	92:7 95:25 121:2	181:12
147:6 147:25 148:8	138:16 177:3	interest 64:7
148:11 149:11	individually 68:3	96:13 96:20 97:5
150:25 152:1 153:4	individuals 64:19	117:3 174:15
153:8 162:21	73:22 73:24 74:7	176:14
163:20 166:5 167:2	74:15 127:6 176:7	interested 65:2 91:6
167:9 169:14 170:6	Indy 157:6	interesting 35:24
171:19 174:2 174:7	influence 153:2	35:25 50:4
175:12 175:18	174:16	interests 62:3
178:4 178:5	influential 151:18	64:3 64:20 65:1
178:5 179:1	Info 71:3 71:24	68:8 99:12 99:14
182:8 183:2 189:12	72:23	99:19
imagine 50:14 52:4	information 13:17	interject 68:21
153:10 186:21	22:10 32:1 38:17	internal 180:15
immediately 181:5	38:20 38:23	international 93:15
impart 52:19 55:16		
55:22 77:5 79:19		

<b>Internet</b> 38:22	84:23 84:25 105:2	<b>jeopardize</b> 130:25
<b>interns</b> 59:1 59:2	<b>Israel</b> 24:13	131:3 131:23 137:5
59:14 59:19	104:20 125:1	139:7
59:20 59:21 59:22	<b>issue</b> 10:22 11:2	<b>Jewish</b> 23:13 23:15
<b>interpret</b> 83:21 86:5	88:15 93:14 94:8	23:23
<b>interpretation</b> 35:25	94:10 94:20	<b>job</b> 62:4
42:7 42:9 83:20	99:15 103:1 129:22	<b>Joe</b> 107:6 107:8
85:18 85:19	140:11 144:17	<b>Joe's</b> 107:7
85:22 140:23	145:10 145:11	<b>jog</b> 180:14 180:21
<b>interpretations</b>	146:25 155:6	<b>John</b> 47:12 47:20
15:21 35:7 35:22	160:13 163:11	48:1
<b>interrupted</b> 136:19	170:3 172:12	<b>join</b> 116:10 116:12
136:20 136:20	185:22	116:13 116:16
<b>INTERRUPTION</b> 17:19	<b>issues</b> 84:4 93:2	116:25 117:1 117:2
<b>interview</b> 72:13	103:18 112:3	117:8 117:12
<b>introductory</b> 38:4	172:21 174:17	<b>joined</b> 67:7 171:6
<b>invade</b> 146:17 147:16	188:6	171:13 171:20
151:9	<b>Istanbul</b> 65:13 68:14	171:25 173:4
<b>invaded</b> 16:10	89:13 91:25 145:18	173:13
16:11 146:21	171:22 173:1	<b>Josh</b> 18:2 18:5
<b>invasion</b> 146:23	<b>itinerary</b> 122:21	45:1 46:3 49:10
147:11 147:20	<b>I've</b> 18:21 24:1 24:3	<b>Joshua</b> 8:18
148:6 148:13	24:11 24:15 25:2	<b>judgment</b> 83:19
150:23 150:24	29:6 40:14 43:9	<b>June</b> 26:7 29:2
<b>investigate</b> 186:13	43:17 43:19 45:2	<b>jurisdiction</b> 140:14
<b>investigation</b> 154:11	45:17 45:18 65:9	
154:20 154:25	68:19 69:7 72:9	
<b>invited</b> 118:9 181:16	72:9 79:15 80:5	<hr/> <b>K</b> <hr/>
<b>involve</b> 34:22	90:18 98:4 107:8	<b>Karsan</b> 114:16 164:24
<b>involved</b> 12:21 16:17	115:20 115:21	<b>K-A-R-S-A-N</b> 164:24
23:12 28:9 66:7	115:21 115:22	<b>Kaya</b> 176:16 176:23
66:9 66:15 75:13	115:23 117:1	176:24
117:3 134:2	124:21 127:12	<b>K-A-Y-A</b> 176:16
<b>involvement</b> 66:13	129:15 133:4 133:5	<b>keenly</b> 137:23
67:1 150:2 150:4	135:7 135:14	<b>Kentuckiana</b> 8:7
156:23	139:12 144:13	<b>Kentucky</b> 156:13
<b>Iran</b> 104:18 104:18	145:11 173:24	<b>killed</b> 22:19 23:1
104:19 104:19	174:1 174:3 177:25	23:2 29:11 41:16
<b>Iraq</b> 104:18 104:19	184:18 188:18	43:2 43:24 81:8
146:17 146:21	189:1	88:9
147:20 150:22		<b>kinds</b> 59:19
151:7	<hr/> <b>J</b> <hr/>	<b>Klein</b> 24:4
<b>irate</b> 185:13	<b>J.S</b> 71:5 71:6 71:21	<b>knew</b> 99:24 107:21
<b>Ireland</b> 104:25	<b>JAG</b> 24:7	120:5 128:8
<b>irrelevant</b> 21:1 83:4	<b>Jamaica</b> 105:4	<b>knowledge</b> 16:3
113:11 140:18	<b>James</b> 181:6	19:3 19:4 19:7
143:13 143:15	<b>Jean</b> 8:10 8:11	20:25 21:23
149:4 149:5 166:14	8:23 8:25 37:14	29:16 40:15
169:25	53:14 91:25 100:23	43:10 43:18
<b>Islam</b> 150:15	107:2 108:18	75:22 88:17 91:9
150:16 150:17	144:20 160:23	122:7 154:3
150:18	164:7 164:13	154:6 154:7 154:16
<b>Islamic</b> 149:18	<b>Jeannette</b> 9:19	154:17 154:18
149:23 150:7	<b>Jeffrey</b> 181:6	155:12 156:22
<b>isn't</b> 40:23 84:23	<b>Jennifer</b> 118:13	174:8 177:7
	180:16 187:23	<b>known</b> 14:13 15:11

HOOBMAN

10000000000

17:1	least 12:20 63:2	148:1 152:6
Krikorian 8:11	74:2 76:8 86:2	163:9 178:9
8:17 8:19 8:21	leave 34:12 34:23	list 45:21 51:18
17:21 17:23 22:3	94:4 94:6 94:8	56:19 57:13 77:2
30:24 47:17 76:4	96:11 96:14	105:3 113:5 115:20
76:6 100:17 101:12	96:18 97:9 105:3	115:23 176:9 178:7
101:16 102:19	leaving 105:9 181:13	listen 17:25 35:11
106:22 107:22	legal 55:25 56:1	listening 174:6
108:20 147:3 169:1	113:1 114:11	174:7
182:24 183:9	114:15 128:14	listing 55:8
183:17 183:23	128:17 128:19	lists 66:13 66:16
184:6 186:3	175:6	66:17 176:9
186:9 186:11	legally 117:24	literally 188:17
186:22 187:15	legislate 41:13	little 14:7 35:24
Krikorian's 51:3	less 173:3	105:14 108:21
103:3 103:9 152:24	let's 31:9 39:11	130:3 156:23
153:20 160:14	42:20 42:22	live 9:19
164:12 165:8	42:24 45:14	lives 148:6 148:14
168:14 168:24	50:13 50:16	lobby 98:22
184:24	54:13 58:3 65:10	lobbyist 151:23
Kuwait 104:18	66:3 66:11 91:15	152:10 152:10
	91:18 94:22	152:20 166:2
L	94:22 102:4	167:12
Lack 175:11	102:5 111:4 120:12	lobbyists 64:18
laid 83:23 149:6	123:8 132:20 133:7	151:19 166:1
land 147:10 147:13	147:16 153:23	166:24 166:25
147:17 147:19	158:22 164:3	167:15 167:19
148:5 150:23 151:8	185:21	167:20
language 39:25 39:25	letter 51:3 51:4	lodging 123:2
largely 164:11	102:24 113:22	logged 168:16
last 16:22 18:13	159:14 164:6	long 14:7 39:7
27:23 31:7 47:1	levels 20:18	39:8 60:15 76:11
52:3 58:17 77:8	Lewis 41:19	89:4 92:17
99:24 114:14	Lewy's 32:4 32:9	108:18 111:25
116:11 127:10	38:25 39:3 98:16	124:25
136:25 176:5	lie 107:20	longer 47:5 114:24
176:17 182:3	lies 107:19	120:14
late 24:19 116:11	life 12:12 24:17	lose 69:10
later 80:21 94:16	likely 113:12	lot 14:19 19:15
109:4 115:10 130:3	limit 66:25	61:24 91:6 112:3
173:4 186:24 187:9	limited 25:10 29:5	188:19
letter 122:2	29:7 38:23	loud 186:9
law 41:18 56:23	Lincoln 73:23 92:6	loudly 186:6
58:22 106:2 149:23	102:23 110:24	Leveland 9:20
152:25	129:11 129:13	luck 80:4
laws 169:17	130:18 131:18	lucky 122:23
lawyer 44:23 56:25	137:14 155:5 155:7	lunch 69:12 105:14
56:25	155:10 164:23	
lawyers 175:23	172:1 172:3 174:12	M
lawyer's 80:7	174:14	machine 69:6
lead 113:12 151:4	lincolnmccurdy@fuse	mail 69:24 72:16
leader 29:21 30:6	73:12	102:14
learn 38:24 66:1	line 44:16 44:25	mails 70:15
138:1 138:20	69:15 70:4 87:20	maintains 41:12
learned 24:20 133:4	98:24 102:13	man 60:11 105:2
	121:22 132:16	

149044250014

136:11 177:8 177:9	McCurdy 92:6	174:18 184:21
management 60:1	102:24 110:24	184:22 185:6
manager 46:14 58:2	129:11 129:14	memorized 80:24
58:15 127:13	130:18 131:18	memory 105:6 180:21
manipulate 163:3	132:3 137:14 139:3	men 131:15 164:16
manner 96:21	144:9 155:6	mention 68:6
marathon 13:2	155:7 155:10	mentioned 105:1
March 108:19	157:14 164:23	message 45:25 46:19
140:20 171:14	172:1 172:3	met 12:15 107:8
171:15 171:17	172:5 174:12	129:11 129:13
171:19 171:21	174:14	129:15 129:18
172:12 182:2 182:6	M-C-C-U-R-D-Y 164:23	177:6 177:9
182:9 182:10 183:5	mean 15:24 16:2	Mexico 105:4
mark 17:22 17:23	16:10 34:11 51:7	Michelle 183:21
17:23 17:25	64:14 66:9 66:10	183:22
40:21 47:9 76:3	78:8 79:13 79:23	Microwave 160:1
76:4 90:14 153:5	79:24 83:9 83:10	160:4
marked 25:14 25:24	86:20 86:21	Middle 41:19 104:20
36:11 37:23	94:11 94:13	military 138:16
39:10 41:1 57:16	94:17 104:18	151:1
62:10 63:6 90:16	125:14 128:8 131:5	million 164:16
91:14 91:16	134:13 143:7	mind 10:3 72:8
124:8 124:11	144:24 146:3 158:1	141:17 147:21
124:14 124:24	160:21 163:25	147:22 147:24
139:9 139:10	167:13 171:20	148:1 189:15
139:12 152:23	187:22	mine 85:24 88:13
170:25 180:12	meaning 41:25 160:20	107:4 107:15 108:1
183:1 183:3	means 13:8 22:24	136:4 159:7 181:18
Massacres 14:5 14:15	34:16 75:16	minister 149:22
15:12 21:12	78:21 86:24	minute 62:18 82:6
massive 172:10	meant 95:14	105:4 105:11
172:16	medium-sized 39:9	110:23 133:7
material 141:23	meet 24:6 120:8	153:23
matter 8:11 54:11	120:10 174:11	minutes 92:16 178:18
78:16 84:5 84:19	183:18 183:23	181:13 181:19
95:5 143:2	183:25 183:25	186:24
153:21 175:17	meeting 118:19 119:4	misassembled 54:17
matters 64:21 113:12	119:11 120:3 135:1	mischaracterized
maximum 176:4	177:8 183:8	75:4
may 9:11 18:1	183:9 183:10	mischaracterizing
25:22 40:25	183:13 184:24	162:12 162:14
73:20 75:18	185:1 186:1 186:23	misleading 40:13
75:22 88:21	187:19 188:6	83:13
122:2 123:13	meetings 133:18	misquoted 108:1
126:20 130:8	134:1 186:16 187:7	missed 115:21 157:7
131:25 135:22	member 98:21 133:8	missing 98:17
145:12 149:13	144:20 147:25	178:5 178:5
149:15 149:16	161:13 172:19	mistake 10:19 138:19
156:14 158:10	174:22	Mn-hmm 51:13
158:11 160:9	members 64:12	modern 29:25
160:10 162:16	90:23 98:15	modern-day 29:21
162:16 168:10	98:17 119:5	40:12
176:22 176:23	119:7 119:9 133:24	modernized 30:7
177:9 177:10	137:22 143:22	modified 99:25
maybe 117:17	145:2 145:4	moment 84:22
122:22 149:16	146:7 151:19	

13004400178

Monday 73:23 182:8  
 money 52:23 52:24  
 53:2 53:5 53:9  
 53:11 62:6 64:25  
 66:14 68:7 89:22  
 90:20 90:24 91:5  
 92:21 94:2 95:21  
 95:22 99:13  
 99:19 100:4  
 100:9 100:13  
 100:14 104:11  
 104:12 108:8 129:7  
 154:11 155:4  
 160:15 160:24  
 164:14 165:9  
 165:12 165:17  
 165:22  
 monies 153:1  
 monitor 8:8  
 month 31:4 112:18  
 months 31:7 31:8  
 60:17  
 morning 29:7 63:16  
 63:17 105:23  
 motion 83:2 83:24  
 motivate 103:18  
 move 80:19 187:18  
 moved 183:15  
 moving 87:8 148:22  
 149:13  
 murdering 34:13  
 museums 24:12  
 Muslim 108:9  
 160:25 164:10

N

Nancy 180:10  
 nation 138:9  
 National 183:8  
 187:10  
 Nations 39:14  
 39:19 39:21  
 Nation's 33:23  
 nature 49:7  
 neighbor 183:24  
 Neither 54:10 140:6  
 Newport 156:12  
 newspaper 25:15 26:3  
 26:5 33:5 133:6  
 Nicaragua 105:7  
 nice 121:7  
 Nigeria 105:8  
 nobody 65:3 79:6  
 nods 13:12  
 nondisclosure 134:13

none 19:9  
 nonresponsive 135:23  
 Nope 121:9  
 nor 14:22  
 normally 16:4  
 Normandy 16:12  
 north 146:17 147:16  
 note 73:17 73:20  
 noted 115:21 155:3  
 notes 132:24  
 132:25 133:10  
 nothing 9:7 15:14  
 19:17 29:8 72:2  
 112:11 121:23  
 125:17 154:21  
 189:21  
 notice 62:15  
 noticed 177:17  
 notices 63:4  
 notion 68:12  
 November 81:2  
 82:18 103:11 147:1  
 164:5 166:15  
 180:17 180:25  
 182:3  
 NRCC 106:11 106:13  
 nuance 138:10  
 nuances 138:2  
 numerous 41:10  
 Nuremberg 24:7  
 nutshell 15:4 15:5

O

oath 10:18 11:12  
 51:11  
 Obama's 26:14  
 object 16:20 17:5  
 21:15 23:16  
 39:23 44:2 44:4  
 44:8 53:12 56:23  
 57:2 85:13  
 113:23 121:20  
 121:21 169:24  
 172:14 181:8 185:8  
 objected 113:7  
 objection 18:17  
 18:21 21:19 25:9  
 47:14 48:3 54:6  
 56:15 63:15  
 113:2 113:9 140:10  
 142:12 144:24  
 146:2 146:24  
 147:12 149:3  
 162:11 163:1  
 166:13 169:10

170:15 175:11  
 181:9 184:19  
 obscure 170:21  
 obviously 28:5 82:19  
 127:4 187:13  
 occasions 41:11 64:6  
 occur 10:5 40:16  
 65:21 162:8 187:7  
 occurred 14:10 14:20  
 15:7 16:18 16:25  
 22:3 23:5 23:8  
 32:14 35:20  
 36:15 38:9 40:5  
 40:12 40:15  
 48:17 64:23 111:19  
 122:2 133:14  
 occurs 35:15  
 October 13:3  
 odd 186:23  
 offering 64:25  
 office 31:3 59:9  
 59:15 59:21  
 59:23 62:17  
 62:17 64:3 64:11  
 67:10 67:21  
 67:21 67:23  
 67:24 67:25  
 95:20 106:8  
 106:9 106:17  
 108:18 119:4  
 119:11 159:9 183:6  
 183:14 183:15  
 184:12 184:17  
 185:14 185:20  
 185:23 186:2 186:7  
 186:16 186:25  
 187:8  
 officers 24:7  
 offices 106:10  
 183:15  
 official 130:24  
 officially 171:20  
 off-site 106:15  
 off-the-cuff 159:11  
 oh 13:4 24:11  
 25:23 37:3 37:18  
 39:6 39:8 45:14  
 46:24 52:11  
 71:12 71:16 73:4  
 73:15 76:6 76:10  
 85:2 91:19 91:21  
 94:11 96:23 103:15  
 104:17 104:17  
 104:20 104:24  
 104:25 105:2 105:4  
 105:7 105:7



9775004400H

109:4 116:13 127:2	60:15 61:4 62:4	141:16 141:18
139:24 162:7 163:3	62:7 62:11 63:20	142:3 142:24
168:5 178:8 178:11	63:25 64:17	143:14 144:1
184:15	64:24 65:6 65:14	144:14 145:9
<b>Ohio</b> 8:12 9:20	65:24 66:20	145:13 145:24
11:8 12:15 12:18	66:25 67:4 67:7	146:15 147:16
12:21 36:20	67:20 68:6 68:14	148:15 149:1
45:10 51:15	68:18 70:20 71:2	149:10 149:21
52:19 54:4 55:4	71:12 71:17	150:10 150:22
55:9 55:16 55:22	71:19 71:23 72:7	151:18 153:20
56:9 98:21	73:2 73:6 73:16	153:23 154:3
107:12 109:8	73:20 74:5 74:11	154:18 155:9
109:16 174:16	74:14 74:20	155:12 156:3 157:6
<b>okay</b> 9:25 10:7 10:11	75:12 76:25	157:18 158:6
11:4 11:8 12:23	84:13 89:1 89:6	158:12 158:25
13:6 13:21 14:23	90:9 91:3 91:15	159:25 160:9
15:10 18:3 18:11	91:24 92:1 92:9	160:13 162:16
18:23 19:9 19:25	92:13 92:22 93:1	162:21 163:15
20:3 21:5 21:14	93:8 93:11 93:22	163:18 163:21
21:19 22:9 22:18	95:3 95:9 96:15	165:3 165:6 165:16
22:25 23:4 23:19	96:15 97:2 97:10	166:23 169:2 169:5
23:22 24:14	97:16 97:20 98:4	169:17 171:10
24:22 25:3 25:13	98:24 99:2 99:16	173:10 174:11
26:1 26:3 26:7	100:8 101:11	178:19 179:9 180:5
26:25 27:6 27:12	101:12 101:15	181:3 181:20 182:1
27:19 27:23	103:13 103:17	182:5 182:14
28:10 29:2 29:6	104:4 105:6 105:10	182:19 183:2
29:22 30:1 30:10	105:12 106:6	183:12 184:2
31:12 31:19	106:16 106:20	184:15 185:3
31:21 31:24 32:3	107:7 107:16 108:2	185:15 185:21
32:6 32:9 32:16	108:13 108:24	186:10 186:15
33:4 33:8 33:13	109:10 110:5	186:19 187:9
33:16 33:21 34:5	110:11 110:22	187:13 187:19
34:11 35:1 35:11	110:22 111:4	187:25 188:11
35:12 36:1 36:12	111:15 111:19	188:24 189:5
36:23 37:5 37:9	112:11 113:4	<b>old</b> 60:18 183:14
37:19 38:16	113:21 115:2	183:15
39:11 39:18 40:1	116:22 118:1	<b>omitted</b> 177:17
40:9 41:22 42:8	118:15 118:23	177:21 178:10
42:15 42:24	119:3 119:4	<b>onboard</b> 59:5 61:6
43:13 43:22	119:9 119:21	61:10 62:1 67:6
45:24 46:5 46:13	119:24 120:12	<b>ones</b> 10:2 118:22
46:18 47:19	120:18 122:7 123:1	119:2 181:16
47:22 47:25 48:5	123:7 124:5	<b>online</b> 73:8 98:25
48:9 48:12 49:8	124:5 124:17	<b>onto</b> 37:6 168:16
50:3 50:16 50:19	124:19 124:22	184:7 186:3
50:24 51:1 51:7	125:12 125:13	<b>open</b> 70:17 70:23
51:9 51:10 51:17	125:23 126:17	95:17
51:20 51:24 52:6	127:3 128:11	<b>opens</b> 74:3 106:12
52:16 53:1 53:7	129:18 130:2	<b>operation</b> 58:1 70:20
53:22 54:13	131:17 132:18	<b>OPERATOR</b> 45:10 45:14
54:16 54:19	132:20 133:17	45:17 45:24 46:4
54:24 55:7 55:15	133:19 134:3 135:3	46:10 46:18 46:24
55:21 56:5 57:23	136:1 136:22	<b>opinion</b> 22:8 86:21
57:25 58:10	137:18 139:11	186:14
58:16 58:21 59:4	139:24 140:4	<b>opinions</b> 19:4
59:17 60:5 60:9	140:23 141:5	



people's 138:25 181:2	92:11 186:19 186:25 187:8 187:15	81:19 82:12 82:18 82:23 82:24 83:18 84:6
percent 187:6	photos 186:17	84:17 84:25 85:9 85:23 86:12
percentage 141:13	phrase 38:4 108:4	86:13 87:2 87:12 88:12 96:6 96:10
perfectly 80:12 120:13	pick 181:16	96:16 100:10 100:14 101:1 103:4
perhaps 24:17 57:3 136:7 146:9	picture 92:1 121:3 121:3 124:16 187:4	131:12 140:5 140:16 141:20 142:9 142:18
period 15:15 52:10 188:14	pictures 24:16	143:17 144:4 144:11 144:15 144:17 148:12 148:14 149:14 173:21
periodical 26:2 26:5	piece 125:18	positions 98:1 possible 54:18
periodicals 33:5	Pielsticker 118:14 122:17 122:17	possibly 133:23
permits 38:21	180:16 183:6	Poverty 152:25
perpetrated 23:25	187:23 188:1	power 16:9
persist 97:8	placed 107:1	precious 38:24
persisted 97:17	plain 125:18	precise 143:4
person 26:25 46:15 60:9 61:7 138:17 155:6 176:18 179:17 185:19	planned 156:19	preparation 111:1 111:5 112:12
personal 15:24 157:25 158:1 158:2 159:8	plans 122:20	prepare 33:13 122:15 125:10
personally 54:10 113:15 168:16	play 131:13	prepared 10:20 137:4 159:1 159:10 188:1
persons 22:19 175:24	please 8:14 9:2 9:17 9:25 11:25 22:14 25:22 37:15 45:7 49:20 49:24 61:15 71:4 73:16 73:20 73:23 82:7 89:7 105:17 156:6 166:18 178:22 189:16	prepares 122:16 159:2 preparing 56:1 112:17
perspective 48:20 95:6	pledge 161:18 161:20 pledged 161:22 161:24	present 146:25 presented 79:11 president 26:13 130:22 130:23 130:23 164:25
pertinent 170:3	point 10:3 30:21 34:10 40:4 63:20 64:24 66:1 76:12 88:17 101:22 106:21 107:10 107:16 109:7 116:20 117:16 147:24 186:5	press 143:24 presumably 82:11 176:10
Perusing 25:19 25:25 39:16 49:21 49:25 68:20 90:17 91:18 102:10 108:6 124:1 125:2 163:19	points 19:4 Poland 16:10	presume 53:25 pretty 24:9 66:6 112:2 143:3 166:8
Peter 73:16 73:17 74:2 74:2 114:23	policy 96:15 politely 186:11	prevent 146:21
Phil 11:16 44:15 44:24 45:11 61:1 61:2 61:6 61:10 61:21 62:1 62:4 66:16 69:14 70:7 74:1 76:5 76:7 76:11 76:25 79:13 82:5 83:1 84:1 84:21 86:7 87:8 87:18 87:18 87:24 88:19 88:25 89:23 102:23 103:15 115:1	political 58:3 127:5 127:8 164:15 164:20 164:21	previously 10:17 10:25 11:5 12:9 71:19 88:2 90:15 93:4 107:7 109:24 109:25 115:6 120:9 155:20 160:3 179:11 184:8
Phil's 67:6	Pope 47:12 47:20 47:25	prime 149:22
phone 18:2 18:10 46:17 106:12 110:2	position 38:8 38:13 39:12 40:4 40:7 40:16 42:5 42:10 42:12 42:16 43:15 44:7 44:20 47:4 48:12 80:23 81:1 81:13	Princeton 41:20
photo 90:10 91:16 91:20 91:22 92:2		

<b>principals</b> 128:12	<b>pronunciation</b> 90:4	85:1 85:3 85:9
<b>printout</b> 168:19	<b>proper</b> 85:25	85:10 85:13
<b>printouts</b> 168:21	103:21 107:21	85:14 85:16 86:1
168:24	107:25	86:4 87:3 87:4
<b>prior</b> 11:8 110:23	<b>property</b> 107:1	87:17 88:11 91:8
118:16 126:20	<b>prospective</b> 66:18	94:21 99:16
127:14 152:8 152:9	<b>proven</b> 41:18	99:24 100:13
172:12	<b>provided</b> 62:15	100:22 101:10
<b>privilege</b> 56:5 56:11	63:5 159:21	112:24 113:5 113:7
56:24 57:1 57:9	<b>public</b> 78:6 78:10	113:20 114:5
76:18 77:6 77:18	<b>published</b> 26:8 41:5	114:14 115:6
77:24 78:4 78:18	<b>pull</b> 108:2 123:23	115:13 116:15
79:14 79:22 80:2	151:13	116:15 117:4 117:5
134:8 134:10	<b>pulled</b> 72:21 108:5	118:25 121:21
<b>privileged</b> 141:23	127:19 178:10	126:3 130:15
151:2	<b>pumping</b> 153:1	131:17 135:7
<b>pro</b> 94:14 94:16	<b>purpose</b> 26:16	135:17 135:19
161:2 161:3	26:17 78:20 92:19	135:24 136:1
161:5 161:13	<b>purposes</b> 73:25 135:3	136:20 140:15
161:14 173:14	135:5 147:19 148:5	140:24 143:4
<b>probably</b> 31:20 33:24	<b>pursue</b> 62:2	143:15 146:6
81:23 105:9	<b>pursued</b> 110:9	147:12 148:8
148:2 177:19	<b>purview</b> 95:23	148:11 151:6 151:6
182:17	<b>push</b> 45:8 45:9	152:1 152:9 155:10
<b>probative</b> 85:12	<b>putting</b> 27:14 131:24	163:2 163:2
<b>problem</b> 82:25		163:3 163:4 163:22
109:2 186:8		163:24 165:4
<b>problems</b> 13:17		166:13 166:18
<b>procedural</b> 10:22		167:9 167:10
<b>proceed</b> 9:11 13:15		170:21 171:8 171:9
<b>PROCEEDINGS</b> 8:2		171:12 172:22
<b>process</b> 35:16		173:6 173:10
35:22 36:7		173:17 173:25
<b>processer</b> 159:6		185:11
<b>processor</b> 27:4 27:5		<b>questioning</b> 90:11
<b>produce</b> 125:4		121:22 152:6 163:9
125:5 125:21		<b>questions</b> 13:10
<b>produced</b> 49:11 52:17		16:21 33:1 45:22
62:14 63:3 63:13		76:12 77:3 78:1
63:16 63:17		83:16 87:4
123:9 125:8 125:24		105:23 135:5
125:24 126:11		135:14 135:20
167:25 168:3 168:6		136:17 147:14
168:7 176:9 177:24		152:1 166:8 182:14
183:5		184:13 189:20
<b>production</b> 62:20		<b>quick</b> 189:13
63:14 72:1 123:22		<b>quid</b> 94:14 94:16
<b>progressed</b> 150:22		161:2 161:3
151:7		161:5 161:13
<b>promise</b> 133:11		161:14 173:14
<b>promised</b> 132:19		<b>quite</b> 10:4 39:2 86:8
<b>promptly</b> 69:9		152:5
<b>pronounce</b> 179:14		<b>quo</b> 94:14 94:16
<b>pronounced</b> 90:5		161:2 161:3
<b>pronouncing</b> 32:8		161:5 161:13
		161:14 173:14
		<b>quote</b> 79:25 81:5

Q

**Qaeda** 150:5

**query** 126:11

**question** 10:21 11:15

11:16 13:19

13:20 13:25 14:6

16:24 18:14

18:17 18:22

18:24 20:13

20:16 20:17 21:4

21:8 21:23 22:12

23:17 24:22

32:12 35:13

37:16 37:17

37:21 38:8 40:13

41:12 42:13 43:6

43:6 43:12 44:3

44:8 44:17 44:20

46:25 47:6 53:7

53:12 54:7 54:9

54:21 55:20 56:3

56:15 56:17 57:8

57:13 58:7 58:17

59:14 61:23

66:10 74:25 77:8

77:12 77:13

78:13 80:22

81:11 81:18

81:20 81:22 82:2

83:1 83:12 84:17

NON-VOLUNTARY

quoted 47:20	151:3 154:11	39:20 74:2 74:6
	159:18 164:19	102:8 103:2
	165:25 166:4	103:8 108:24
<hr/> <p style="text-align: center;">R</p> <hr/>	166:11 166:20	refers 72:23 74:11
race 103:1	166:23 167:20	reflect 44:6 81:13
rack 45:21	172:11 172:16	84:17 85:9 86:13
radical 150:15	173:12 176:4	reflection 42:4 44:1
150:16 150:16	receiving 73:20	84:6
150:18 150:21	reception 181:4	reflects 81:19
raise 9:2 56:14	181:19 187:10	reforms 148:22
56:25 62:6 64:25	receptions 181:15	refusal 148:4
68:7 89:22 92:21	recipient 72:15	refuse 40:4 40:9
95:20 95:21	174:21	refused 30:7 76:17
99:12 99:19 102:24	recipients 104:7	77:6 77:8 81:14
raised 18:16 18:21	recitation 47:3	135:8 135:9 147:10
63:22 90:20	reciting 81:15	147:19
90:24 171:23 173:1	recognition 98:1	refuses 84:18
raising 84:3 91:5	recognize 40:5 40:10	refusing 57:8
100:9	125:9 179:16	76:12 114:4 135:11
ran 58:5 58:15 59:25	179:17 179:17	135:12
rather 79:21 169:15	recognized 103:1	regarding 38:18
reaction 110:1 110:3	131:6	61:23 64:6 64:12
138:25 139:6	recognizing 173:22	139:5 149:23
reading 38:21	recollection 11:4	registered 167:14
38:21 82:10	14:21 96:5	167:15 167:19
90:22 165:3	179:22 181:7 184:9	175:10
ready 105:22 189:13	record 8:5 8:6	Registration 167:14
Reagan 48:5	8:15 9:18 10:4	rehabilitative
real 57:19 75:20	11:21 12:1 12:3	178:16
189:12	17:16 45:3 45:4	relate 22:14 125:6
reality 79:5	45:5 45:7 47:7	172:3
really 13:7 16:23	54:11 57:21	related 14:24 20:9
17:10 20:20	61:16 61:18	34:6 172:1 172:5
21:13 22:15 35:9	80:19 80:20	relates 100:18 103:3
49:7 50:4 59:24	87:19 89:8 89:10	169:18
96:3 116:1 121:1	105:18 105:20	relating 16:15 21:24
122:10 127:7	126:8 156:7	49:1 64:3 64:5
140:18 143:12	156:9 159:22	89:15 98:5
148:11 149:6 160:8	178:21 178:23	101:13 158:7 169:2
182:18	178:25 189:17	relation 154:6
realm 133:4	189:19	relations 141:12
reason 83:25 95:22	records 52:18 125:6	152:16
112:9 116:22	red 155:17 156:2	relationship
116:23	redhead 60:24 180:2	109:13 116:19
reasoning 137:11	reelection 99:13	130:25 131:3
reasons 91:9 97:21	refer 30:11 37:22	131:21 131:22
120:11 130:17	163:25	131:24 136:13
164:12 172:19	reference 50:5	136:15 136:24
recall 33:8 103:11	referenced 54:7	137:6 137:21 139:7
157:23 158:4 162:2	77:10 79:7 83:24	146:14 154:22
182:15 182:19	126:16 126:21	173:18 175:2
183:12	referred 14:3	relay 18:2
receive 153:25 166:6	18:15 21:10 48:6	relevance 48:3
167:2 167:3	79:1 79:3 88:2	84:4 84:19 147:2
received 63:1 127:22	189:3	181:9
128:3 151:2	referring 27:15 28:3	

relevancy 23:17	185:4	144:22 145:21
47:14 142:6	remembers 11:19	145:25 161:7
146:2 146:24	143:21	161:25 162:4
relevant 113:12	remind 10:6	173:21 181:21
126:15 142:13	reminded 130:22	182:20 184:3 184:9
religion 30:8 34:7	rendered 22:7	184:16 185:7
religious 34:2	renowned 41:19	185:17 186:4 188:7
148:21 149:14	repeat 14:6 19:7	188:7 189:9
rely 152:1	35:8 40:8	resolutions 41:11
re-mark 40:25	repeatedly 83:15	139:13 140:1 140:5
remember 10:8	repeats 164:6 164:11	141:19 158:7
10:10 10:12	repetitive 86:10	respect 15:7 16:18
10:16 11:3 11:6	rephrase 13:20	19:22 20:4 20:9
11:17 12:14	report 62:7 155:2	30:10 40:6 90:18
12:16 28:10	reported 47:18	96:2 111:15 121:17
28:13 28:21	154:21	145:24 169:22
28:24 30:21	reporter 9:3 9:5	respected 41:20
32:19 32:21	9:10 13:7 42:14	respectfully 165:1
32:23 34:9 59:3	46:11 58:7 78:2	respond 18:19
59:6 60:10 60:14	82:4 82:6 82:9	18:19 21:3 37:17
61:10 64:22	124:13 124:15	87:3 135:24 170:9
68:17 90:8 93:3	124:17 124:19	responded 85:23
93:6 93:13 93:17	124:22 127:3 180:8	Respondent 8:17
93:21 110:1 115:11	180:11	response 12:9
115:25 116:7	Reporters 8:7	12:11 16:22
117:10 117:12	reports 62:11	21:21 21:22
117:14 118:19	represent 53:22	45:18 52:4 62:14
118:21 118:22	85:21 87:16	63:3 63:13 86:1
119:2 119:3 119:17	88:11 179:19	86:8 88:21 126:4
120:2 120:3 120:13	representation 82:11	126:11
120:15 120:17	82:17 82:23 84:25	responsible 23:7
120:23 121:3	Representative	108:18
121:10 122:3	160:23	responsive 86:1
126:12 131:2	representatives 64:3	117:5 126:24 165:4
133:24 136:8	represented 127:11	rest 51:4 130:12
136:10 136:11	represents 54:3	restaurant 71:10
145:6 145:12 146:9	87:12	result 22:20 23:8
146:13 148:18	reprimanded 149:22	137:20 151:25
152:21 157:3	request 17:10 123:10	retained 110:17
157:12 157:21	126:15	111:20 112:18
158:16 158:23	requests 63:14	113:14 113:15
159:12 160:5	research 41:14 86:18	113:17
160:17 162:6 162:7	resides 176:11	retaining 111:10
162:25 174:13	resolution 27:13	111:15 145:5
177:8 177:9	27:18 96:7 96:11	review 133:10
180:4 180:24 181:2	96:17 97:4 98:20	Richter 45:11
181:11 181:17	129:24 130:1 130:4	57:14 76:5 76:5
181:23 181:23	130:20 131:24	76:8 78:3 79:12
182:18 182:22	137:3 138:12 139:4	79:23 80:14
183:10 183:16	139:23 140:24	80:16 82:8 82:14
184:5 184:6 184:10	142:9 142:10	84:2 84:22 87:10
184:24 185:12	142:13 142:19	87:25 88:20 89:1
185:13 185:16	142:20 142:21	113:5
185:18 185:20	143:17 144:5	rid 179:3
189:11	144:12 144:17	rights 169:22 170:24
remembered 120:16		rise 106:22

Road 9:20  
Robert 91:19  
role 61:4 116:18  
138:1  
Roll 125:1  
Ronald 48:5  
room 11:23 46:16  
94:4 94:6 94:9  
133:5 133:9 134:25  
134:25 141:17  
rose 16:9  
rule 87:8 118:25  
150:10  
ruled 113:10  
Rules 118:6  
run 13:2 59:15 59:17  
running 58:3 61:13  
98:19  
runs 58:1 106:1  
106:8 106:11

S

safe 40:7  
safety 131:15  
Saltzman 110:25  
119:18 119:19  
119:22 128:12  
175:5 175:9  
Sarajevo 104:21  
satisfactory 88:21  
88:22  
saw 175:20  
schedule 156:21  
157:4  
scheduler 180:17  
Schmidt 8:10 8:11  
8:23 8:25 9:1 9:15  
9:19 12:5 18:13  
25:21 26:1 37:12  
37:12 37:14  
41:10 42:25  
50:22 53:14  
57:22 61:20 63:9  
69:20 69:23 70:8  
71:9 72:24 76:12  
76:23 81:6 86:18  
88:2 89:12 91:25  
98:14 100:23  
101:13 107:2  
108:11 114:23  
127:21 136:23  
144:20 160:24  
164:7 164:13  
schmidtfor 73:3  
schmidtforcongress@f

use.net 70:12  
70:15 70:18 73:11  
Schmidt's 108:18  
Schneider 183:21  
183:22  
scholar 22:2 28:25  
41:19  
school 24:10 24:20  
24:20  
scope 143:22  
scratch 180:11  
scream 186:6  
screwed 79:6 80:3  
screw-up 80:1  
scroll 124:25  
scrutinized 78:9  
search 52:17  
second 20:24 24:1  
37:2 92:8 102:13  
103:20 108:6  
173:10  
seconds 89:5  
second-term 174:15  
secracy 133:2  
secret 132:20  
secretary 138:1  
secular 30:9  
148:17 149:19  
secularized 29:24  
30:7  
seeing 110:9  
seem 166:8 177:17  
seemed 71:23  
seen 24:23 25:4 25:6  
39:15 40:22 41:3  
71:19 90:15  
98:14 168:19  
168:21 168:24  
169:3 186:24  
selected 53:9  
53:14 53:15  
send 102:24 159:14  
sends 69:21 69:23  
sense 82:1 123:12  
sensitive 64:11  
132:10 132:12  
132:22 133:25  
137:25  
sensitivities 138:2  
sensitivity 133:2  
134:1 138:10  
sent 69:14 69:25  
70:2 70:4 70:6  
70:11 70:15  
70:18 72:24

sentence 37:13  
108:23 164:9  
sentences 108:22  
separate 108:21  
147:12  
September 102:7  
102:13 102:15  
102:17 103:13  
Serbia 104:22 104:23  
series 16:21  
serious 48:18  
Serpil 180:20  
served 107:7  
services 113:1  
session 143:9  
sets 66:4  
setting 156:23 157:2  
several 82:2  
shake 138:3  
shakes 13:13  
share 30:1  
she'd 80:24  
sheet 50:8  
Sheridan 8:9  
she's 15:24 20:15  
76:14 78:5 79:24  
87:6 134:7 135:7  
135:8 135:16  
135:19 135:19  
135:19 170:21  
175:12  
shoot 104:21  
104:24 105:4 105:7  
short 60:20 156:4  
178:7  
shortens 75:21  
shortly 112:21  
180:18  
sic 27:21 40:21  
131:6 144:22  
sides 29:11 96:3  
sign 184:6 186:3  
signed 54:22 54:24  
55:13 55:17  
68:24 69:9 69:16  
77:14 113:21  
132:13 134:3 134:9  
significant 179:12  
signing 137:2  
signs 110:8  
simple 84:17 87:14  
166:8 167:9 167:10  
simply 79:20 81:18  
84:5  
single 31:24 31:25

UNCLASSIFIED

108:23  
**sir** 11:3 11:11 22:15  
25:22 40:14  
56:10 56:13 116:23  
162:20  
**sit** 40:10 133:20  
**site** 73:24  
**sitting** 10:7 75:23  
92:14 182:17  
**situation** 32:14  
149:17  
**six** 60:17 61:24  
**sixth** 68:19  
**skinny** 60:22 60:23  
**slaughter** 164:15  
**smiled** 187:15  
**smiling** 186:24  
**snowing** 104:25  
**socialized** 187:16  
**solemnly** 9:5  
**solicit** 100:16  
**solicitation** 66:12  
**solicitations** 66:11  
**solicited** 89:21  
100:24 101:6  
101:18  
**soliciting** 99:3  
**somebody** 52:17 52:17  
65:15 75:21  
89:25 94:4 94:18  
95:3 95:11 120:5  
121:11 138:4  
138:21 138:23  
162:19 168:25  
176:16  
**somehow** 51:5  
108:14 165:4  
**someone** 55:3 60:6  
64:24 87:14  
94:24 96:10 107:11  
107:16 120:18  
130:19 138:11  
159:2  
**sometime** 24:19  
171:20  
**somewhere** 124:21  
**sorry** 9:16 17:17  
23:5 25:15 25:23  
30:15 37:3 40:24  
50:1 50:22 51:8  
54:25 59:8 62:15  
69:7 71:17 72:17  
73:7 80:4 90:8  
90:22 94:11 96:9  
104:4 106:9 114:13  
127:2 128:13  
129:22 131:11  
139:20 139:24  
145:1 148:12 153:8  
163:20 174:2  
175:18 181:24  
182:9  
**sort** 22:4 69:16  
118:24 134:7  
**SOTTO** 45:16 114:12  
147:15 151:17  
163:7 167:23  
174:10 177:4 178:3  
181:25  
**sound** 74:14  
**sounded** 88:20  
**sounds** 105:16  
**source** 152:2  
**sources** 30:16  
**Southern** 152:25  
**space** 147:10 147:13  
**Spain** 104:24  
**speak** 46:15 118:15  
118:18 120:9 144:7  
144:9 188:18  
**Speakers** 130:21  
**speaking** 17:14  
**special** 96:13  
133:5 133:9 134:25  
**specialist** 179:1  
**specific** 10:8  
31:14 33:9 108:4  
158:22  
**specifically** 14:12  
31:17 70:25 96:3  
168:22 185:25  
**speculate** 52:5  
**speech** 141:22  
142:4 143:20  
143:23 158:12  
158:18 158:20  
158:22 159:3  
**speeches** 158:18  
159:14  
**spell** 90:3  
**spend** 112:5  
**spending** 44:19  
180:24  
**spent** 179:21  
**spoke** 144:14 145:20  
**spoken** 119:22 142:17  
142:25 144:13  
144:21 145:9  
145:11 145:14  
188:19  
**sponsor** 160:20  
163:25 164:2 165:7  
165:11  
**sponsored** 33:24 34:3  
34:7 38:11 38:14  
48:23 49:3 75:13  
160:15 163:12  
164:14 164:20  
164:22  
**sponsorship** 160:14  
163:10  
**spreadsheet** 49:23  
76:24  
**squirring** 120:24  
**staff** 26:24 27:9  
58:22 89:24  
89:25 105:25 106:5  
109:14 116:2  
116:24 117:7  
118:11 118:16  
119:8 119:8  
119:9 119:13  
122:15 125:5 125:7  
130:11 130:18  
132:7 156:22  
156:25 157:1  
157:13 159:2 162:4  
175:21 186:7  
**stand** 11:25 17:18  
61:15 89:7 98:22  
105:17 156:6  
178:22 182:5  
189:16  
**stare** 125:15  
**start** 27:16 37:24  
42:24 151:12  
**started** 16:9 16:10  
97:12 163:10  
**starting** 102:25  
**starts** 104:25  
**starving** 188:17  
**state** 9:17 21:18  
64:15 135:6 138:1  
**stated** 19:5 38:15  
40:14 43:17 54:7  
82:24 87:2 103:5  
103:9 126:13  
**statement** 12:24  
15:25 19:18 44:6  
44:20 47:2 47:12  
51:11 56:23  
76:23 81:10  
83:23 85:20  
85:21 86:6 86:10  
86:11 86:17  
86:24 86:25



87:12 101:5 101:24	159:21	Taiwan 104:17
108:1 109:1	subsequent 122:18	taking 37:14 79:6
135:7 137:10	subset 52:12 52:14	101:23 133:10
137:12 137:19	52:16 53:18	talk 11:20 13:9
164:1 164:11	53:22 77:2 77:3	27:12 57:14
164:18 165:8 185:8	substance 14:23	65:10 75:21 93:1
statements 11:10	29:13 29:22	95:4 97:14
54:11 82:21 100:17	success 131:15	109:10 109:11
101:1 103:3 106:22	Sudan 188:13	110:22 111:4
States 24:12 39:24	sufficient 83:10	112:14 116:6 118:8
64:21 93:19 95:5	suggest 154:10	119:12 119:15
98:2 104:8	154:21	119:18 123:8
104:13 104:16	suggested 35:2 35:14	129:19 132:11
118:2 119:13 131:5	sum 14:23 29:13	133:7 135:2 143:20
133:15 135:16	29:22	146:25 147:16
136:3 139:4	summary 39:24	153:23 158:15
144:4 146:12	Sunday 106:24	158:22 174:12
146:16 150:8	Super 116:14	181:20
150:19 153:2	support 98:23 169:21	talked 30:13
161:17 169:23	170:13	109:15 109:18
173:5 174:22	supporting 127:24	109:24 110:24
174:23	173:3	112:17 115:7 115:9
stay 45:5 45:6	supportive 65:1	115:13 115:17
45:7 181:18 182:12	suppose 83:21	115:23 115:25
stayed 104:21 182:12	supposed 28:20 28:24	116:4 127:12
step 178:19	52:19 52:22 54:4	129:21 129:24
Stephen 8:5	supposedly 136:3	129:25 130:21
stickers 124:18	Supreme 149:23	143:24 144:3
stop 37:15 85:16	sure 10:4 10:5 12:10	148:16 155:20
103:20	22:23 25:23	156:12 156:19
stopped 188:15	27:22 33:7 39:17	157:1 158:7 159:11
strange 174:14	48:19 50:9 57:15	talking 14:12
strategize 66:3	57:17 61:14	21:13 24:24
strategy 65:25	67:19 87:25 88:3	34:13 38:22
67:1 78:19	90:4 92:14 93:10	68:15 83:3
street 178:11	101:10 103:22	101:11 105:13
strife 23:9	109:5 117:22	107:25 108:5
strike 165:24	117:24 128:8	108:11 119:10
student 15:8 19:23	134:11 134:18	140:2 143:24 157:3
20:10 20:15 22:1	134:20 135:4	161:8 162:15
38:12	144:10 145:6 147:3	talks 32:14 166:14
studied 24:9	152:1 153:8 153:12	tall 60:20 179:23
stuff 25:3 126:22	155:15 156:5 174:6	179:24
subcommittee	175:16	tape 89:3 124:6
133:21 140:9	surfaced 154:9	taped 126:2
subject 14:16	surfacing 111:2	targeted 70:24
16:25 17:7 21:14	surfing 38:22	targets 148:3
21:16 35:17	survivors 24:4	TCA 80:25
subjectively 150:11	swear 9:5	technician 8:6
submitted 51:14	swearing 53:25 134:4	telephone 11:7 12:17
175:17	sworn 9:2 51:11	TELEPHONIC 17:19
subpoena 62:14	53:24 76:23 133:1	ten 133:17 181:19
126:14		tend 80:16
subpoenas 62:16 63:4		tendered 51:18
63:14 159:16		tenet 130:13
		tense 146:25
	T	
	table 92:5	

11007420001

<b>term</b> 19:7 20:19	176:16	88:8
20:19 34:14	<b>they're</b> 21:15	<b>transcribe</b> 13:13
34:22 75:19	70:15 70:18 93:9	13:14
75:20 75:20 131:19	94:18 97:23	<b>transcript</b> 81:24
131:19 150:21	100:9 102:15 103:7	185:10 189:22
167:17 173:25	106:4 116:20	<b>transpired</b> 64:1
<b>terms</b> 20:23 65:25	124:21 132:11	<b>travel</b> 114:16 121:18
66:1 67:2 78:24	148:22 159:22	122:19 123:3
79:6 79:8 106:20	<b>they've</b> 129:8 159:21	<b>treasurer</b> 58:13
115:2 127:14	<b>thin</b> 125:19	58:14 62:9 62:11
135:23	<b>third</b> 12:20 24:3	114:22 114:24
<b>terribly</b> 187:13	30:15 92:1	114:25 164:24
<b>territory</b> 146:22	112:14 144:20	<b>treaty</b> 39:25 39:25
<b>Terror</b> 64:7 64:13	<b>third-party</b> 30:16	<b>trial</b> 23:11 23:24
116:18 116:21	62:16	24:8
130:7 131:9 131:14	<b>Thirty</b> 89:5	<b>tribunal</b> 38:14 43:20
132:13	<b>thousands</b> 121:5	48:16 48:21 49:4
<b>test</b> 105:6	121:5	49:6
<b>testified</b> 162:1	<b>threat</b> 150:8	<b>trick</b> 162:19
<b>testimony</b> 8:6 9:6	150:11 150:18	<b>tried</b> 45:18
53:15 75:5	<b>threatened</b> 136:14	<b>trip</b> 13:16 117:16
162:12 162:22	<b>throughout</b> 138:5	117:20 117:25
162:22 172:9	179:20	118:3 118:9 118:16
172:15 178:16	<b>tickets</b> 157:6	119:6 119:10
<b>text</b> 108:13 158:19	<b>timeline</b> 147:23	120:24 121:11
188:1	<b>tired</b> 182:9	121:17 121:22
<b>Thank</b> 9:10 9:12	<b>title</b> 31:24	122:4 122:6 122:20
18:11 35:1 43:5	<b>today</b> 8:6 8:7 10:7	122:23 122:24
46:21 57:12	13:8 13:25 22:5	166:10 179:21
57:14 60:5 61:1	24:24 30:11	<b>trips</b> 105:8 122:13
88:23 88:25 89:1	32:17 33:14	<b>Tronccone</b> 8:5
104:23 117:4	40:10 62:23 63:2	<b>troops</b> 146:18
121:25 124:17	75:23 120:4	<b>trouble</b> 136:9
140:12 147:7	131:9 149:18	<b>true</b> 40:9 67:4 76:14
155:18 166:16	149:20 152:9	76:19 77:7 78:16
171:1 171:1 172:17	167:25 168:3 168:7	83:11 87:16 164:22
<b>thanks</b> 46:23 153:9	<b>today's</b> 8:6 25:15	170:16 170:17
<b>that'll</b> 46:14	25:17 25:20 26:1	170:17 170:18
<b>themselves</b> 8:15	26:8	170:20 177:12
<b>theory</b> 36:3 36:5	<b>ton</b> 30:21 32:20	<b>truncated</b> 19:20
36:6	<b>top</b> 73:13 104:7	<b>trustee</b> 12:13
<b>therefore</b> 10:19	104:7 178:9	<b>truth</b> 9:7 9:7 9:8
83:12	178:9 178:10	11:13
<b>there's</b> 16:22	<b>topic</b> 93:14 93:15	<b>truthful</b> 87:2
35:18 48:20	95:8 188:5	<b>try</b> 13:15 13:21 21:5
53:14 96:3 105:5	<b>topics</b> 97:12 184:2	50:16 51:8 54:13
106:1 108:3 114:10	<b>total</b> 29:13 29:22	90:12 91:22
114:15 123:8	52:9	94:22 105:15
123:17 125:17	<b>toward</b> 141:19	120:12 165:6 166:9
138:24 139:13	<b>township</b> 12:13	<b>trying</b> 14:8 14:18
154:10 154:20	<b>tracking</b> 73:25	15:9 17:15 19:24
154:20 154:24	<b>traded</b> 161:17 162:17	20:11 21:3 22:4
155:25 156:2 157:1	<b>tragic</b> 41:15 41:24	22:15 28:16
167:13 169:10	42:10 42:16 43:1	34:21 36:4 38:17
170:17 171:5	43:23 81:7 83:8	39:12 53:8 55:16
172:10 172:14		55:22 56:20 61:6

1000-2101014-2-0011

70:5 77:5 103:21  
 104:19 105:23  
 135:20 136:8  
 136:10 162:19  
 162:21 165:10  
**Ture** 177:18  
**Turkey** 26:2 26:3  
 26:8 28:9 28:19  
 29:4 29:17 29:21  
 29:24 30:7 30:7  
 30:9 40:6 40:12  
 43:8 49:1 64:4  
 64:5 99:15 100:7  
 105:1 116:17  
 116:19 117:17  
 117:20 118:3  
 119:16 120:24  
 120:25 121:17  
 130:5 130:7 130:25  
 131:9 131:12  
 131:22 136:12  
 136:24 137:5 137:6  
 137:21 139:6 139:8  
 148:16 148:17  
 148:21 149:18  
 150:24 151:20  
 151:23 152:11  
 152:16 152:21  
 153:1 153:2 154:23  
 166:1 166:3  
 166:4 166:10  
 166:12 166:21  
 167:21 169:9  
 169:17 169:21  
 170:13 172:21  
 179:21  
**Turkey's** 26:6 64:20  
**Turkish** 30:3 41:5  
 63:21 65:1 65:6  
 65:7 65:9 65:11  
 68:8 68:14 69:12  
 71:3 71:7 71:9  
 71:24 72:24  
 72:25 73:7 74:11  
 74:16 74:21  
 74:22 75:1 75:7  
 75:10 75:14  
 75:15 75:15  
 75:18 75:25 81:1  
 88:6 90:19 90:23  
 99:11 99:12  
 99:18 99:18  
 100:4 100:8  
 104:7 104:10 116:7  
 116:10 116:12  
 116:16 116:25  
 117:8 118:2 121:11

122:8 125:6 126:16  
 127:23 127:23  
 127:24 128:4  
 128:13 128:13  
 128:16 128:22  
 129:2 129:4 129:22  
 131:6 131:23 137:8  
 141:12 146:12  
 146:15 146:20  
 146:22 147:9  
 147:18 149:21  
 149:22 149:24  
 150:1 150:4 153:24  
 154:4 154:4  
 154:5 154:14  
 154:15 155:13  
 155:14 155:19  
 155:25 156:12  
 160:16 161:3 161:6  
 163:12 164:14  
 164:17 164:19  
 164:22 164:25  
 165:1 165:9 165:13  
 165:17 165:22  
 166:1 166:24  
 169:21 170:1 171:6  
 171:13 171:25  
 172:19 172:20  
 173:2 173:4 173:13  
 174:21 174:22  
 175:6 175:6 175:10  
 181:4  
**Turkish-American**  
 63:22 64:7 71:8  
 91:10 91:24  
 98:23 176:10  
**Turkish-council**  
 73:22 74:12 75:6  
 75:11 75:12  
 75:19 76:1  
**Turkish-sounding**  
 73:21 74:6 74:9  
**Turks** 28:9 30:5  
 41:16 42:18 43:2  
 43:24 81:8 88:9  
 108:9 160:25  
**turn** 51:19 68:18  
 155:3  
**Twenty-four** 31:8  
**twice** 45:18 129:16  
**two-minute** 61:12  
**two-page** 55:7  
**type** 158:2 165:25  
**typed** 158:25  
**typically** 176:25

**U**  
**U.S** 152:16  
**Uh-huh** 13:22 58:6  
 69:18 73:9 89:14  
 98:9 124:20  
 128:7 168:17  
**Uh-huhs** 13:12  
**uh-uhs** 13:12  
**UN** 188:15  
**uncomfortable** 138:13  
**understand** 10:15  
 13:19 14:10 15:6  
 16:24 20:14  
 28:18 35:10 39:1  
 39:12 53:8 69:11  
 70:5 100:20 101:10  
 105:24 109:4 138:8  
 161:20 162:21  
 175:16  
**understanding** 14:1  
 14:8 14:24 15:2  
 15:10 15:18  
 15:19 16:5 16:14  
 16:17 16:25 17:2  
 17:4 17:10 18:14  
 18:25 19:10  
 19:20 19:20  
 19:21 20:4 20:6  
 20:8 21:9 21:24  
 22:11 22:13  
 22:16 22:19  
 22:21 23:1 23:4  
 23:23 24:17 25:5  
 25:7 25:10 26:4  
 28:11 28:17 29:3  
 29:5 29:7 29:14  
 29:15 29:23 30:2  
 30:3 30:14 33:17  
 33:19 33:22 34:5  
 34:18 34:18  
 34:21 43:7 51:21  
 55:15 57:10 78:7  
 82:10 99:18  
 99:22 100:1  
 100:4 106:6 116:17  
 127:1 149:2 159:20  
 164:2 164:4  
 165:7 165:11 169:5  
 179:20  
**understood** 109:5  
**Unintelligible** 101:4  
**United** 24:12 33:22  
 39:14 39:19  
 39:21 39:24  
 64:21 93:18 95:5

100-100000-100000

98:2 104:8	178:25 189:18	wasn't 10:14 14:21
104:13 104:16	<b>videographer</b> 8:4	14:21 15:9 20:2
118:1 119:13 131:5	8:14 9:1 9:11	22:16 26:16
133:15 135:16	11:25 12:2 45:3	26:17 28:13
136:3 139:4	61:15 61:17 89:2	43:19 44:23 70:2
144:4 146:12	89:5 89:7 89:9	74:15 75:1 85:4
146:16 150:8	105:17 105:19	86:6 88:16 117:4
150:18 153:2	156:6 156:8 178:22	147:25 151:25
161:17 169:23	178:24 189:16	<b>wasting</b> 83:5
173:4 174:22	189:18	<b>watch</b> 35:12
174:23	<b>view</b> 19:5 186:6	<b>waving</b> 135:4
<b>universe</b> 167:13	<b>viewpoint</b> 143:14	<b>weather</b> 122:24
<b>University</b> 41:20	<b>violate</b> 56:4	<b>web</b> 73:21
<b>unless</b> 48:13 48:20	<b>visit</b> 26:14 26:15	<b>website</b> 159:23
79:23 144:24	181:22	164:12 168:15
<b>unrelated</b> 57:3 57:5	<b>visited</b> 104:15	<b>we'd</b> 44:15
<b>unresponsive</b> 166:9	115:20 168:14	<b>week</b> 106:19 122:22
<b>unusual</b> 118:4	<b>VOICE</b> 45:16 114:12	127:11 127:18
<b>upon</b> 16:7 25:3	147:15 151:17	172:6 179:2
25:6 57:9 66:21	163:7 167:23	<b>weeks</b> 171:24 173:3
70:22 77:22	174:10 177:4 178:3	173:13
85:21 86:18 95:8	181:25	<b>welcome</b> 44:18 46:24
100:18 101:13	<b>voiced</b> 41:11	<b>we'll</b> 11:15 37:5
101:17 113:10	<b>voluntarily</b> 83:2	42:24 45:21
134:24 150:9	<b>vote</b> 94:12 94:19	45:22 46:12
150:11 150:13	97:3 140:16	49:16 76:20
150:14 150:20	141:1 142:22	80:19 80:21
154:7 155:14 162:9	143:13 161:17	80:21 82:4 87:9
<b>ups</b> 137:1	161:18 161:21	87:21 88:23
<b>upset</b> 83:16 186:12	162:18	94:16 110:22 113:4
187:14 187:17	<b>voted</b> 129:25 140:6	113:5 124:7 159:14
<b>USA</b> 164:25	140:8 140:13	178:20 180:6
<b>usually</b> 17:12	161:19 161:24	<b>we're</b> 10:3 10:18
94:14 95:17	189:9	12:2 16:1 21:13
<b>utterly</b> 83:4 166:9		24:24 28:20
169:24		28:24 30:10 45:6
		45:11 57:23
		61:17 66:14
		71:11 87:19 89:9
		103:21 105:19
		124:25 126:8 130:2
		162:14 179:8
		187:21 189:13
		<b>we've</b> 17:11 76:11
		80:20 81:3 83:1
		83:23 87:22 88:2
		125:14 126:21
		129:24 177:5
		<b>Wexler</b> 91:19
		<b>what-all</b> 45:19
		<b>whatever</b> 10:19
		15:1 38:22 148:3
		172:19
		<b>whenever</b> 106:12
		<b>wherein</b> 162:17
		<b>where's</b> 160:23

110044MOUN-01

<b>whether</b> 15:24	159:1 162:20 164:8	<b>young</b> 60:18
23:11 38:9 40:15	175:6 179:6	<b>yours</b> 123:23 123:25
43:10 43:18	<b>working</b> 58:8 58:18	<b>yourself</b> 131:13
48:17 81:19	59:23 146:14	155:3
87:11 88:15	<b>works</b> 13:7 65:25	<b>you've</b> 9:15 12:6
95:19 95:20	67:12 67:13	12:7 12:20 19:5
99:23 125:11 126:4	67:23 106:19	20:8 21:25 25:3
130:18 130:22	<b>world</b> 14:11 14:19	25:4 25:6 29:8
134:24 134:25	14:19 15:13	31:10 31:13
138:3 138:3 143:21	16:10 19:12	31:25 32:16
143:24 159:10	19:13 19:14	38:25 43:5 47:19
159:11 167:3 174:9	19:15 19:16	48:9 53:18 54:9
177:18 185:9 187:5	29:20 30:4 30:6	75:4 96:25 98:1
189:7	32:18 41:15	104:16 116:4
<b>Whoever</b> 49:25	41:24 42:17 43:1	132:19 133:15
<b>whole</b> 9:7 36:18	43:24 81:7 83:8	142:17 142:25
53:19 54:14	88:8 137:23	144:21 145:9
82:16 123:22	138:6 164:17	149:16 151:2 151:3
182:12	<b>world-renowned</b> 24:5	153:20 155:5 157:1
<b>whom</b> 62:7 109:12	<b>wow</b> 96:23 104:17	166:20 169:3 177:6
118:18 144:7	<b>wrap</b> 105:15 178:18	180:16 188:19
<b>who's</b> 58:2 58:2	189:13	189:3
114:17 114:25	<b>write</b> 26:19 26:23	
179:12	27:1 84:7 158:18	<u>Z</u>
<b>whose</b> 92:1 107:14	158:19 176:18	<b>Zaman</b> 25:16 25:18
<b>wide</b> 95:17	<b>written</b> 34:1 40:19	25:20 26:1 26:8
<b>wife</b> 85:17 157:17	41:23 81:3 85:4	27:21
<b>Willard</b> 181:12	137:3 188:2	<b>zoning</b> 12:14
<b>willing</b> 78:10 98:21	<b>wrong</b> 32:7 34:19	
<b>wish</b> 60:10	40:20 71:11	
<b>withdraw</b> 83:2 83:24	71:16 71:17	
<b>witness</b> 9:4 9:9 21:3	93:23 93:24 138:20	
24:1 24:15 37:13	165:15	
37:18 63:10	<b>wrote</b> 26:11 29:2	
69:12 80:15 102:10	83:7 84:9 84:13	
102:21 104:1 113:2	169:1	
114:7 125:17	<b>www.jeanschmidt.</b>	
125:23 127:8	<b>com</b> 99:1	
134:11 134:18	<b>www.jeanschmidt.</b>	
134:23 135:12	<b>com/http</b> 99:1	
137:15 137:18		
139:22 141:24	<u>X</u>	
149:4 152:4 171:10	<b>Xerox</b> 69:6	
<b>woman</b> 60:11 60:12		
176:24 177:10	<u>Y</u>	
177:11	<b>Yalcin</b> 121:8	
<b>woman's</b> 176:23	157:18 176:6	
176:24	179:13 179:22	
<b>women</b> 131:15 164:16	180:20 182:15	
<b>won</b> 16:12	<b>yard</b> 110:8	
<b>work</b> 45:25 58:23	<b>yet</b> 32:17 140:22	
59:20 59:21	141:7 141:8	
59:22 60:15	171:9 179:7	
67:10 67:10	<b>York</b> 156:14	
67:11 67:11	<b>you-all</b> 62:14 167:24	
67:20 67:21 113:18	177:21	

# Schmidt Snubs Ethics Panel Order to Pay Off Legal Debts

by Shane Goldmacher

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Rep. Jean Schmidt, R-Ohio.

Rep. Jean Schmidt has largely blown off a mandate from the House Ethics Committee to repay more than \$400,000 in legal bills -- and her surprise loss in a March primary means that she may never pay the debt.

Schmidt, an Ohio Republican, raised only \$5,000 to pay off the debt in the first three months of 2012, according to new disclosure filings. Because of her primary defeat, she will soon be gone from the halls of Congress -- and the jurisdiction of the congressional ethics enforcers that ordered her to pay the legal fees.

Last August, the House Ethics Committee said that Schmidt must repay legal assistance that she received from a Turkish-American interest group that constituted an improper gift, even though she had accepted it unknowingly. At the time, the panel's report said that Schmidt had "worked in good faith" to resolve the issue.

After the panel's mandate, Schmidt established a legal trust, but it has largely been dormant.

She did previously repay nearly \$43,000 in spending that the panel said she couldn't cover with the legal fund, her spokesman, Barrett Brunsman, noted. "It has always been her intention to pay off her legal bills," he said. Asked if the lawmaker would guarantee that the bills would be paid by the time she leaves the House, Brunsman said, "It's too soon to say at this point." If Schmidt does run out the clock on repaying the legal fees, the stalling tactic would not appear to violate the ethics panel order, which put no time constraint on when Schmidt needed to repay.

"The ethics committee is not a law-enforcement agency," said Jan Baran, a Washington lawyer who specializes in ethics cases. Its order to repay "no longer can be enforced in any way if she leaves" Congress, he said. The panel's only recourse would be to seek further sanctions, such as a



reprimand, while she is still a member, but Baran said that such a step is unlikely.

"The ultimate penalty," he said, is that voters tossed her from Congress. The House Ethics Committee declined to comment. Brunsman said that Schmidt remains in "full compliance" with the ethics mandate.

Schmidt, who was the House's first casualty of 2012, is unlikely to be able to rely on her campaign treasury to pay off the legal fees, either. Her reelection account had less than \$4,000 in it and more than \$184,000 in debts as of the end of March.

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