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**IN THE UNITED STATES DISTRICT COURT**  
**FOR THE DISTRICT OF COLUMBIA**

UNITED STATES OF AMERICA .  
Plaintiff, .  
vs. . Docket No. CR 17-46  
. .  
KASSIM TAJIDEEN . Washington, D.C.  
. August 28, 2017  
Defendant. .  
. . . . .x 3:04 p.m.

TRANSCRIPT OF MOTIONS HEARING  
BEFORE THE HONORABLE SENIOR JUDGE REGGIE B. WALTON  
UNITED STATES DISTRICT JUDGE

APPEARANCES:

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2 Official Court Reporter  
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4 333 Constitution Avenue, N.W.  
5 Washington, D.C. 20001  
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7 Proceedings recorded by machine shorthand, transcript  
8 produced by computer-aided transcription.  
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**P R O C E E D I N G S**

THE DEPUTY CLERK: Your Honor, this afternoon's matter, United States versus Kassim Tajideen. This is Criminal Record 17-46. Ask the parties to step forward and identify yourselves for the record, please.

MR. GILLICE: Good afternoon. Tom Gillice along with Jacqueline Barkett and Joseph Palazzo on behalf of the United States.

THE COURT: Good afternoon.

MR. PALAZZO: Good afternoon.

MR. JONES: Good afternoon, your Honor. Mat Jones on behalf of Kassim Tajideen, who is present, along with my colleagues, Ronald Meltzer and David Bowker.

THE COURT: In reference to this motion, is the essence of the motion a desire to have information related to the designation of your client as a terrorist?

MR. JONES: To some extent, your Honor, yes. We're seeking information that is in OFAC's files that touches on virtually every aspect of preparing his defense to the charges that are in the indictment. We're not seeking, asking the Court to remove Mr. Tajideen from the SDGT list. We're not asking only for the information that the government will be putting forward during its case-in-chief. We're looking for the information under Rule 16 and Brady that is material to preparing Mr. Tajideen's

1 defense on the charges that are in the indictment.

2 THE COURT: But as I understand the government,  
3 and obviously I'll hear from the government, even though  
4 there may be allegations in the indictment they don't intend  
5 to necessarily introduce evidence regarding all of those  
6 allegations.

7 MR. JONES: Regardless of whether the government  
8 intends to introduce that evidence those issues are  
9 inextricably tied in to the charges that the government  
10 continues to press.

11 Count one of the indictment charges Mr. Tajideen  
12 with a conspiracy to defraud OFAC of its lawful government  
13 functions by making material misrepresentations over a  
14 seven-year period in which he was engaged with OFAC trying  
15 to convince it that he should not have been designated as a  
16 specially designated global terrorist because he had not and  
17 does not support Hezbollah. As overt acts in further of  
18 that conspiracy the government selects a few sentence  
19 fragments from that seven-year long history and says they  
20 were materially false. That includes in Paragraph 29, of  
21 the indictment in which the government alleges that  
22 Mr. Tajideen lied about reframing from financial dealings  
23 with entities and individuals associated with terrorist  
24 organizations such as Hezbollah.

25 THE COURT: So are you saying that other things

1 that he would have said to the agency over that period of  
2 time would tend to undermine the suggestion that what the  
3 government's relying upon are falsehoods?

4 MR. JONES: That's right. It is our understanding  
5 that Mr. Tajideen's engagement with OFAC, his level of  
6 opening up his personal and business affairs over that  
7 seven-year period was literally unprecedented and  
8 fundamentally inconsistent with the government's theory that  
9 Mr. Tajideen was conspiring to defraud OFAC. You know, he  
10 was hiring a big four firm to vet millions of his  
11 transactions, offering to have in-person meetings with U.S.  
12 government officials, to answer their questions. Giving up  
13 reams of confidential business information.

14 And OFAC's analysis of all those submissions,  
15 their awareness of them, their remarking on the extensive  
16 degree of his transparency. Their decision to say we don't  
17 need any more information because you have provided us so  
18 much detail. All of that information would help to develop  
19 the defense that Mr. Tajideen was not intending to defraud  
20 OFAC of its lawful government functions.

21 To us it seems self-evident that in a case where  
22 he is charged with conspiring to defraud OFAC of its  
23 government functions you need some documents to describe  
24 what the government's lawful functions were in this case.  
25 What was OFAC up to? What was important to OFAC? What was

1 OFAC doing? Rather than honing in on this self-selected  
2 record that the government has prepared. Instead it's  
3 important to look at the full context of the back and forth  
4 with OFAC in order to understand that context.

5 THE COURT: Let me hear from the government, and  
6 I'll let you obviously respond.

7 MR. JONES: Sure.

8 THE COURT: I guess I -- because obviously what's  
9 alleged in the indictment isn't necessarily what the  
10 government will have to introduce evidence on. Because I  
11 think the government has a right to omit evidence related to  
12 allegations in the indictment if it deems that appropriate.  
13 I don't think that's inappropriate for the government to do.  
14 But what do you intend to present in support of the  
15 defendant's alleged culpability?

16 MR. GILLICE: So, your Honor, with regard to the  
17 OFAC piece in particular what we would anticipate calling  
18 would be a witness from OFAC just in general say what the  
19 agency is, that is it's an arm of the Department of the  
20 Treasury. What its general purpose as an agency is. And  
21 from there we would ask whether or not the defendant was  
22 designated, and would show --

23 THE COURT: Designated as?

24 MR. GILLICE: As a specially designated global  
25 terrorist, as I believe the words that the Federal Register

1 notice uses. We would enter the Federal Register notice  
2 into evidence. Thereafter, we would ask the witness whether  
3 or not the witness had run checks to determine whether or  
4 not licenses were prepared or were issued for specific  
5 transactions or for specific companies. And that of course,  
6 would go to the specific transactions that are at issue with  
7 regard to the indictment, the ones that are charged and  
8 alleged further as overt acts in furtherance of the  
9 conspiracy.

10 THE COURT: In reference to the designation itself  
11 while I understand that the designation is not an element of  
12 the offenses charged in this case, considering the nature of  
13 the designation and considering the nature of the charges  
14 that have been filed against the defendant, which are  
15 terrorist related charges, isn't there the potential that if  
16 you introduce evidence about the designation even though  
17 it's not an element, that the jury may nonetheless consider  
18 that designation in their assessment as to whether or not  
19 he's culpable of a terrorist related conduct?

20 MR. GILLICE: Your Honor, I think the Court could  
21 adequately address that through appropriate jury  
22 instructions and instruct the jury they should draw no  
23 reference to, whatever the wording is that we would all  
24 decide on I'm sure together, that would be put forth to the  
25 jury in this case.

1           THE COURT: And hopefully, you know, the jury does  
2 listen to instructions and follow those instructions, but  
3 there's no guarantee that's always going to be the case.  
4 And if there is evidence, I'm not saying there is, that  
5 would negate the legitimacy of the designation then why  
6 shouldn't they be able to prove that?

7           For example, even though motive is not an element  
8 of any crime if the government introduces evidence of motive  
9 in support of its theory as to why the elements have been  
10 proven, it seems to me that if the government has  
11 information related to motive that the defense would be  
12 entitled to discovery regarding that evidence in order to  
13 negate or undermine, defend against the claim that there was  
14 a motive. And why isn't this analogous?

15           MR. GILLICE: In this case, your Honor, I would  
16 point the Court to some of the cases we cited in our brief.  
17 The one that seems most appropriate is actually the Lewis  
18 versus U.S. case. That's a case in which a person who had  
19 been previously convicted of a felony was attempting to  
20 basically, collaterally attack that felony for purposes of  
21 subsequent charge. And the Court said no, you can't attack  
22 that now. You can't attack that in this proceeding, and  
23 because you had an opportunity to attack it previously and  
24 you chose not to do so.

25           And indeed, not only did you choose not to do so,



1 but you chose to in essence pretend you didn't have that  
2 prior felony when determining what actions you took going  
3 forward.

4 To my mind the defendant was designated. I  
5 understand that he was trying to fight that designation that  
6 he was engaged with OFAC and trying to get himself delisted  
7 and it was not working out. Nonetheless, he was required to  
8 abide by that designation and not do business with U.S.  
9 companies and entities and he continued to do so. So really  
10 the underpinnings of that particular designation, the basis  
11 whether or not it was correct are not at issue in this  
12 trial.

13 What are at issue are whether or not the defendant  
14 basically was involved in these transactions, caused  
15 transactions in violation of OFAC's regulations. And you  
16 know, as part of our proof of that of course, we have to  
17 show that he was designated, and so that's why we are  
18 circumscribing our proof. We under the case law to be  
19 relatively clear on this point that we would not, we would  
20 not presume to come in and try to prove that the defendant  
21 was materially supporting Hezbollah in a case where he's not  
22 charged with materially supporting Hezbollah.

23 THE COURT: What about the position articulated by  
24 defense counsel that if you're just using certain statements  
25 that he made to the agency in support of your theory that he

1 provided false and fraudulent information to the agency,  
2 that if there's additional information he provided to the  
3 agency that that information they say would tend to  
4 undermine the suggestion that the limited number of  
5 statements that he made that you're going to seek to use  
6 were false, that these other statements would put those  
7 statements in context, and therefore conceivably undermine  
8 the position that those statements are false?

9 MR. GILLICE: And so in essence we agreed with the  
10 defendant that they should have access to that information.  
11 What we disagree about is exactly what that information is.  
12 So what the government has done is we have gone to OFAC, and  
13 we have gotten from what we understand or are in the process  
14 of getting. What we understand from them to be and this is  
15 their words, "All unclassified non-privileged materials  
16 relating to the defendant's designation." And some other  
17 related to his delisting petition, and the designation of  
18 his brother's and several companies.

19 And we have provided --

20 THE COURT: You're not saying that his statements  
21 that he made to OFAC would be privileged, are you?

22 MR. GILLICE: No, no not at all.

23 THE COURT: As I understand that's one of the  
24 things that they're saying they want any statements he would  
25 have made to OFAC that they say if they're able to introduce

1 or have access to that and able to introduce that that would  
2 undermine your position that the statements that you're  
3 using were false.

4 MR. GILLICE: And I agree that they should have  
5 access to that information. And that was the next part of  
6 my summation. We have also asked OFAC for all official  
7 communications back and forth between OFAC and the  
8 defendant, and not only these attorneys, but the attorneys  
9 that preceded them in representing the defendant. And so in  
10 the end, your Honor, what is left that has not been turned  
11 over from OFAC is a small universe of documents which OFAC  
12 -- what they did give us was what they said were all  
13 unclassified and non-privileged documents.

14 So we have turned over what we understand to be --

15 THE COURT: As I understand I guess it's public  
16 knowledge that a classified filing has been made to you by  
17 the Court?

18 MR. GILLICE: That's correct.

19 THE COURT: That additional information you say  
20 has not been produced is that, that's the subject of that  
21 classified filing or not?

22 MR. GILLICE: I have to be very careful in my  
23 answers.

24 THE COURT: I understand, and I'm not obviously  
25 trying to have you reveal any classified information. But

1 are you saying that the information you provided to me in  
2 this classified filing is that information that has not been  
3 introduced to the defense?

4 MR. GILLICE: I cannot make representations about  
5 that in particular, your Honor. What I can say is that OFAC  
6 has told us in essence what I've already told the Court,  
7 that they provided --

8 THE COURT: So if I review that information that's  
9 not going to inform me as to whether this additional  
10 information that you've produced should be produced?

11 MR. GILLICE: Your Honor, if I were to answer that  
12 question I think it would, I think it would implicate  
13 classified, a classified information privilege. And so I  
14 request to either answer that in some ex parte classified  
15 forum or to not answer it.

16 THE COURT: I may have to have you do that. I  
17 haven't had since that information was just submitted, I  
18 haven't had a chance to review that classified information  
19 yet, which I will do before I make a definitive ruling on  
20 the motion that's currently before me which hopefully I will  
21 be able to do expeditiously, but I need to I think review  
22 that. And that may inform me as to whether I think this  
23 additional information that conceivably we're talking about  
24 needs to be revealed to me in another classified filing or  
25 some type of classified proceeding.

1 MR. GILLICE: Very well. Your Honor, one other  
2 thing I would just point out to the Court. Defense counsel  
3 in their motions and in their oral argument today talks  
4 about how they need OFAC's internal documents. This is the  
5 other part of things apart from any information that might  
6 be classified with regard to OFAC files on the defendant.  
7 Our OFAC only internal documents and their presumedly this  
8 would be emails amongst OFAC personnel. If there are any  
9 internal memorandum that you know things of that nature.

10 So your Honor, those pieces of information the  
11 government believes are not relevant to anything that needs  
12 to be proven in this trial or that needs to be defended  
13 against in this trial. The government has charged the  
14 defendant with conspiracy to do two things, actually three  
15 things. Count one is violate i.e., but and defraud the  
16 government, so that's a conspiracy to defraud basically  
17 OFAC.

18 The conspiracy does not require that OFAC buy in  
19 to the fraud. And in fact, I think that, I don't want to  
20 speak for OFAC, but one presumes that in the course of  
21 getting, putting forward information to try to get himself  
22 delisted that if they'd have bought the fraud he would have  
23 been delisted by now. No. What we're required to prove is  
24 the defendant conspired to defraud OFAC. An attempt is good  
25 enough. A conspiracy and agreement with someone else to put

1 forward false information is good enough.

2           What OFAC thinks about what he said to them makes  
3 no difference. If the defendant lied to OFAC about item A,  
4 and they believe it, does that matter? If they don't  
5 believe it, does that matter to his intent as to what's in  
6 his mind? The only thing that matters for the defendant's  
7 mind is what he hears or says with regard to OFAC. So his  
8 correspondence as the Court has already pointed out would be  
9 relevant. As defense counsel pointed out. What he says to  
10 OFAC that would certainly be relevant. They can try to show  
11 that you know they set a thousand things to OFAC. And only  
12 X number of them were not true.

13           They could try to say that OFAC in their  
14 correspondence to the defendant said A, B, and C, and that  
15 therefore affected his intent. And that would be a logical  
16 argument.

17           THE COURT: And you've agreed that if there is  
18 such information you will provide that?

19           MR. GILLICE: Yes, your Honor. As I said we have  
20 provided, I believe we provided already if we haven't we are  
21 in the process of doing it, all correspondence, official  
22 correspondence from OFAC, between OFAC and the defendant and  
23 his prior counsels as well.

24           But what, what does not go into the defendant's  
25 intent were his knowledge or anything else, stuff that he

1 doesn't know about. So if you know per one of their points  
2 in their pleadings you know he tells OFAC about a company  
3 that he owns and thereafter that company is never designated  
4 as an SDGT as a number of other companies actually were.

5 That fact that it was never designated by OFAC  
6 where he can use that fact. He can use that fact by saying  
7 you know OFAC never designated this company. But what he  
8 can't use is any internal discussions about whether or not  
9 it should have been designated because he doesn't know about  
10 those. Those don't go to what his intent might be, or what  
11 he understands the law to be. Or whatever else is internal  
12 to the defendant's thinking that the defendant's defense is  
13 trying to point to in order to make these documents  
14 relevant.

15 THE COURT: So in reference to the designation  
16 itself since you say it's not an element of the crimes he's  
17 charged with then why is it even relevant to introduce  
18 evidence of the designation?

19 MR. GILLICE: Well, your Honor, there's one slight  
20 correction I'd make. The designation, the fact of the  
21 designation is an element that the government has to prove,  
22 but it's the biases behind the designation. We are not  
23 going to come into court and say the defendant was  
24 designated because he was providing financial support to  
25 Hezbollah as the press release says and et cetera, et cetera

1 about Hezbollah and financial support.

2           What we're going to do is come into court as --  
3 what we plan to do is come into court and present the  
4 testimony as I recited to you earlier. Very bare bones.  
5 This is a designation. This is a, you know, there were no  
6 licenses. And just a little bit about OFAC as an agency  
7 because not everybody knows what OFAC is or does or what  
8 have you.

9           THE COURT: Thank you. I may have further  
10 questions after I hear from defense counsel.

11           In reference to the designations how do you  
12 distinguish the case the government relies upon as to why  
13 you should not have a right to challenge the designation  
14 since it was decided in the context of a felon previously  
15 convicted of a crime that he in that case did not have a  
16 right to challenge the underlying felony conviction?

17           MR. JONES: Your Honor, Lewis was followed by  
18 before administrative determination can be used as a  
19 conclusive element in support of a criminal case there must  
20 be some meaningful review of that review of that  
21 determination by an independent judicial officer. That has  
22 not occurred here.

23           This is a strange situation in which Mr. Tajideen  
24 himself is the target of the sanctions that were allegedly  
25 violated in this case. He has not had a chance to have that



1 designation reviewed at all by a judicial officer because he  
2 was --

3 THE COURT: He could have, right?

4 MR. JONES: Well, he was in the notice midst of  
5 the back and forth with OFAC when the Justice Department  
6 came in and brought these charges against him. So he was,  
7 so he was unable to do so. So the government's position is  
8 we can conclusively establish these, this element of the  
9 offense. It doesn't matter if independent judicial review  
10 would find it unlawful, discriminatory, pulled out of thin  
11 air. We can conclusively establish this element of the  
12 offense through the designation. We think that's incorrect.

13 But your Honor does not have to decide that  
14 question in order to resolve this motion. Because those  
15 designation materials are tied in and meshed with so many of  
16 the other part of preparing this defense. It's a bit of a  
17 moving target here, but it is incorrect to say as the  
18 government just did that this case is all about  
19 transactions, and whether those transactions were violative  
20 of the law.

21 The first count of this indictment is a conspiracy  
22 to defraud OFAC of its lawful government functions over the  
23 course of the seven-year period with the sole point of the  
24 back and forth between OFAC and Mr. Tajideen was over, does  
25 he support Hezbollah? Should he be especially designated

1 global terrorist on this list? That was the entire point of  
2 the proceeding in which this fraud allegedly occurred. So  
3 it's impossible to pull, to pull these charges out from  
4 their context.

5 THE COURT: Have they provided you discovery about  
6 what those legitimate government functions were?

7 MR. JONES: No. What we have is -- what the  
8 government has provided is what its described as  
9 non-privileged, unclassified documents. It says we're going  
10 to get those eventually. But what that means is that the  
11 vast majority of that is documents that Mr. Tajideen himself  
12 submitted to OFAC to try to get delisted. We have two  
13 memos, heavily redacted memos that say Mr. Tajideen should  
14 be on the list, redacted, redacted, redacted. He supports  
15 Hezbollah, he should be on the list. That's the sum and  
16 substance of it.

17 We don't have anything that shows us what was  
18 going on inside OFAC. What its lawful government functions  
19 were. And we think that is indeed relevant to  
20 Mr. Tajideen's intent, for example, if Mr. Tajideen gets up  
21 at trial.

22 THE COURT: I would assume, I could be wrong. I  
23 am not familiar with the statute. I haven't had a chance to  
24 really look at it in great detail, but I would assume that  
25 what the lawful government functions are are set forth in

1 the statute that created the agency, right? Maybe I'm wrong  
2 in that regard, but I would assume if that's the predicate  
3 for the charges that they'd have to present some evidence to  
4 show what those lawful government functions were, and that  
5 he in some way circumvented or did something that was  
6 contrary to those functions.

7 MR. JONES: In order to understand what  
8 Mr. Tajideen was doing, the effect of what he saying, the  
9 intent of what he was saying, you have to understand the  
10 context in which it was taking place. Our argument would be  
11 that this entire, that this entire episode was about proving  
12 that he was not Hezbollah.

13 THE COURT: Have they told you what those  
14 functions were that they believed he violated?

15 MR. JONES: They say very broadly, they say I  
16 think it's the enforcement of OFAC regulations.

17 THE COURT: I mean with reference to discovery, I  
18 assume there is a request that's been made, what were those  
19 regulations that you say were violated. And obviously  
20 they'd have an obligation it seems to me to tell you what  
21 those regulations were.

22 MR. JONES: We have not put the question in exact  
23 that way. In the indictment they describe the OFAC, lawful  
24 functions of OFAC just to be enforcement of the OFAC  
25 regulations, I believe.

1 THE COURT: Let me just ask the government and  
2 I'll let you respond, does the government intend to  
3 introduce evidence of what those lawful functions that you  
4 say he violated?

5 MR. GILLICE: Well your Honor, in one sense, yes.  
6 The defendant was required to get a license or to not cause  
7 U.S. firms to not get a license prior to dealing with him.

8 THE COURT: Right.

9 MR. GILLICE: And so that is a lawful government  
10 function that was the defendant --

11 THE COURT: I guess my question is do you intend  
12 to reveal to them upon request what those lawful government  
13 functions were that you say he in some way made false  
14 statements in reference to or defrauded?

15 MR. GILLICE: Certainly. I believe we already  
16 have, but I'm certainly happy to have a further conversation  
17 with defense counsel if they are unclear. Yes, absolutely.

18 THE COURT: Okay. Thank you. With those  
19 representations I mean why would you be entitled to anything  
20 more than that information as to what those lawful functions  
21 were and why they believe that he violated those?

22 MR. JONES: Because it goes to Mr. Tajideen's  
23 intent and what he understood this whole proceeding to be  
24 about, which is reflected in OFAC's filing. What was  
25 actually going on? For instance, the government says

1 that -- so its key theory in this case is that Mr. Tajideen  
2 set up and then used these U.S. entities with which he was  
3 not associated to secretly conduct business with the United  
4 States. The whole theory is that he was trying to hide his  
5 association with these entities.

6           There's one in the indictment that's prominently  
7 featured called ICTC. The record would show that  
8 Mr. Tajideen disclosed his association with ICTC to OFAC  
9 back in 2012, that he gave status reports on ICTC to OCTF in  
10 '13, '15 and 2016. And documents that would show OFAC's  
11 awareness of that issue, their analysis of the issue, and  
12 the fact that OFAC chose not to designate ICTC. Not to put  
13 it on the list of companies that can't do business with the  
14 U.S. Those could help establish a powerful defense that  
15 one, those transactions with ICTC were not in themselves  
16 violative of the regulations. Or that a minimum that  
17 Mr. Tajideen did not intend them to violate the regulations.

18           The government wants to suggest that the  
19 regulations here are very clear cut, easy to understand, but  
20 they are incredibly burdensome and difficult. And OFAC's  
21 documents that show how they apply to this specific  
22 situations of this case will be very important in  
23 determining whether or not Mr. Tajideen -- a conspiracy  
24 existed and whether or not there was any intent to violate  
25 the law.

1 THE COURT: It seems to me you know what the  
2 regulations are. And if you're saying they are complex and  
3 difficult to understand obviously you can present those to  
4 the jury. And if the jury accepted your proposition that  
5 they are complex and difficult to understand why wouldn't  
6 that be in and of itself sufficient to support the theory  
7 that you're advancing?

8 MR. JONES: It would be easy for Mr. Tajideen to  
9 get up on the stand and say I don't understand all this  
10 stuff. It's really complicated, but if there's a document  
11 from OFAC that says it's unclear whether ICTC is covered by  
12 --

13 THE COURT: That would be great. I mean sure, if  
14 there's something that exists now that they know that's a  
15 theory of your defense that these regulations are complex  
16 and difficult to understand, if internally they have some  
17 information that people in OFAC were saying that information  
18 was difficult to understand then it seems to me that would  
19 qualify as Brady and have an obligation to produce it.

20 MR. JONES: We agree, your Honor. The concern  
21 here is the government has said we're not going to look at  
22 anything that OFAC determines to be classified or  
23 privileged. We're not sure what -- these are unspecified  
24 privileges. We're not sure if they're qualified.

25 THE COURT: Maybe I'm wrong, but I thought that

1 initially they said they weren't going to review the OFAC  
2 information. They took a different position and said  
3 ultimately they would review it. Am I wrong in that regard?

4 MR. GILLICE: No, your Honor, we have and we are  
5 reviewing OFAC information, that's correct.

6 MR. JONES: Including all classified and allegedly  
7 privileged documents?

8 MR. GILLICE: I can't speak to classified  
9 documents.

10 THE COURT: But I mean obviously if that  
11 classified information would include exculpatory information  
12 that he'd be entitled to then he'd have a right either to  
13 receive it. Or under IEEPA for the consequences of it not  
14 being produced because it is classified which is a  
15 government decision coming into play.

16 MR. GILLICE: Your Honor, what I can say is that  
17 if any classified information is implied or intersects with  
18 this case the government will absolutely deal with it  
19 through the appropriate processes.

20 THE COURT: And if there is inculpatory  
21 information contained within that, I assume although you may  
22 not reveal the nature of it, that you would let me and the  
23 defense know that there is such information. Obviously you  
24 may have to reveal that to me in an ex parte proceeding, and  
25 then I would have to make a determination as to whether it

1 is in fact producible. If it is in fact producible then  
2 under IEEPA, I'd have to make a determination if you decide  
3 not to produce it, which you have a right not to do, whether  
4 there's any consequences from that decision, which is what I  
5 had to do quite frequently in the Libby case. Obviously,  
6 that's an obligation I have under IEEPA.

7 MR. GILLICE: Your Honor, one thing that might  
8 help in this regard. The other part of the question that I  
9 have not answered is with regard to privileged information  
10 from OFAC. If defense counsel has any specific items such  
11 as that that they would ask us to look for we're happy to do  
12 so with regard to any sort of privileged information, and  
13 then deal with that appropriately as well.

14 THE COURT: Okay. With the concessions that the  
15 government has made about what it would do, I guess I'm  
16 amiss as to what else it is you're saying that they have an  
17 obligation to do and that you're entitled to. Because they  
18 seem to say they will review all of the OFAC information  
19 whether it be classified or unclassified. And if there is  
20 in fact Brady information that's relevant to this case that  
21 they'll produce that. And they've already said they are  
22 prepared to introduce any of the statements your client is  
23 supposed to have made to OFAC. Whether they're relying upon  
24 them are or not. Consistent with your position that those  
25 other statements might in fact undermine the suggestion that



1 the statements they're relying upon were in fact fraudulent  
2 or false.

3 MR. JONES: What I think -- your Honor, I heard  
4 with respect to classified information that they do intend  
5 to review all of the classified information to look for  
6 otherwise discoverable material and then deal with it  
7 through the IEEPA process. As part of that process we would  
8 simply ask that the Court to the greatest extent possible,  
9 make those ex parte filings available in some redacted form  
10 to preserve due process to the extent possible while  
11 protecting what IEEPA is intended to protect.

12 As you know under IEEPA you are allowed to but not  
13 required to entertain ex parte submissions from the  
14 government. And in this case we're particularly concerned  
15 about the government's representations about classified  
16 information not being subject to the regular adversarial  
17 process. Because the drips and drabs of information that  
18 we've gotten out of OFAC over the last seven years have  
19 proven to be oftentimes faulty, flawed, demonstratively  
20 false, mixing up company names, conflating Mr. Tajideen's  
21 basic factual errors.

22 And obviously your Honor is naturally not  
23 sufficiently with the facts to sufficiently interrogate the  
24 government's representations in those regard. So to the  
25 extent that the adversarial process can be preserved, we

1 would ask your Honor to ask the government to make redacted  
2 filings available. At least on legal argumentation issues  
3 if not the classified information that's involved.

4 THE COURT: As I understand IEEPA and as I said  
5 became extremely emerged in the IEEPA process in the Scooter  
6 Libby case, I think the government has an obligation to do  
7 what you're requesting that they do. Obviously they can if  
8 they are seeking to use that redaction as a basis for  
9 introducing that information in the redacted form. And then  
10 I have to make a determination as to whether that  
11 essentially gives you what the classified information what  
12 it entails.

13 But if they decide that the information is so  
14 highly classified that it would potentially cause harm to  
15 the national security or whatever you know national  
16 security, then obviously they it seems to me don't have to  
17 produce it in an adversarial manner. Maybe they produce it  
18 to me if they so chose. I assume they could conceivably  
19 decide not to introduce it and then maybe suffer the  
20 consequences.

21 At least in the Libby trial they did in that case  
22 submit to me things that they weren't prepared to give to  
23 the defense and were prepared to give to me in an ex parte  
24 manner. And then I had to assess whether the information  
25 was in fact pertinent to the defense. And if it was

1 pertinent whether a redaction of it that would preserve its  
2 classified nature but nonetheless provide to the defense  
3 what the defense wanted and had to make a determination as  
4 to whether that was essential or not essential but whether  
5 it was in fact sufficient to provide what the defense wanted  
6 by way of a defense. And if I decided that was not the case  
7 then I would have to conclude that information related to a  
8 certain part of the government's case that related to that  
9 information could not be introduced.

10 MR. JONES: Yes, your Honor. You're exactly right  
11 about the general process. I apologize for not being more  
12 clear. I was speaking about their filing itself under  
13 Section IV, which they are, they are permitted to ask you to  
14 take that argument ex parte. Under Section IV you are  
15 allowed to but not required to take that motion ex parte.  
16 And in many cases judges will order the government to redact  
17 the filing so that, for instance, it leaves the cases in the  
18 legal argumentation so that the adversarial process is  
19 preserved to some degree.

20 And so we would ask as IEEPA litigation goes on  
21 here that we be permitted to engage in that process to the  
22 extent possible.

23 THE COURT: What if the government took the  
24 position, I don't know if they would, but what if they took  
25 the position that even in a redacted form it would

1 potentially disclose information that could be harmful to  
2 the government, and therefore, it's not prepared to produce  
3 that redaction?

4 MR. JONES: That would be up to your Honor to  
5 decide under IEEPA how to proceed then.

6 THE COURT: Considering it seems they've made  
7 concessions that to address to a significant degree what  
8 you're saying that you're entitled to.

9 MR. JONES: I think the one remaining piece here  
10 which seems -- I'm still, perhaps I'm just being not sharp  
11 here, but is the question of what's going to happen with the  
12 documents that OFAC is calling privileged. I think  
13 Mr. Gillice said that he wants us to come back with more  
14 specific requests, but I think that's putting the cart  
15 before the horse. Those documents the government in our  
16 view has an obligation to review them for Brady, to review  
17 them for Rule 16 materials. And then, and then decide  
18 whether the privilege is such that it is strong enough that  
19 they wouldn't have to turn over that information probably by  
20 providing a privileged log.

21 And in particular here where we don't even know  
22 what the grounds for this privilege is; if it's attorney  
23 client. If it's some flavor of deliberative process  
24 privilege, something that's qualified or unqualified. The  
25 government should have to look at those documents first to

1 determine whether or not they are otherwise discoverable  
2 rather than saying we're not going to look at them because  
3 they are privileged unless you come back and tell us exactly  
4 where to go look for Rule 16 or Brady materials.

5 THE COURT: I didn't understand them to say that.  
6 I thought they said that they would review both the  
7 unclassified and the classified information. And if upon  
8 that review there was information that was producible either  
9 under Rule 16 or under Brady that they would either produce  
10 it. Or if they felt it was not subject to production either  
11 because of its classified nature or because of a privilege,  
12 that I assume they are saying they would then let the Court  
13 know that they have made that decision. And I guess we'd  
14 have to then go from there assuming that they in fact make  
15 one of those determinations.

16 MR. JONES: If the government intends to review  
17 all the potentially privileged documents for Rule 16 or  
18 Brady materials then we have no concern about that process.

19 MR. GILLICE: Your Honor, we do. The reason that  
20 I asked for some pointers as it were is because just like in  
21 any arena if the defendant has a certain view of Brady that  
22 we're not aware of and we don't know that and we don't know  
23 to look for that.

24 THE COURT: I think that's fair. I don't think  
25 you have to speculate as to what conceivably might be their

1 defense because I think that's probably impossible. And I  
2 think to the extent that they have a theory, and obviously  
3 in the IEEPA context it may be unfortunate, but it's the  
4 reality based upon the statute and why the statute was  
5 adopted that under certain circumstances the defense is  
6 going to have to, which is normally not the case, reveal  
7 what their potential defense is in order to put the  
8 government on notice as to what they should be seeking to  
9 assess, and what conceivably their discovery obligation is  
10 as a result of that assessment.

11 So I mean that's the unfortunate maybe reality of  
12 a situation where you're talking about classified  
13 information that requires in certain circumstances that the  
14 defense have to play its hand in order for the government to  
15 know to what extent it has a discovery obligation.

16 So I will under the circumstances based upon  
17 what's been represented to me, obviously I'll review the  
18 issue of if it needs to be done I will conclude that the  
19 motion for discovery should be denied based upon the  
20 government's representation that it will in fact review both  
21 the classified and the unclassified information contained in  
22 the OFAC file. And if there is in fact Rule 16 discoverable  
23 information or Brady information that that information will  
24 be produced. Or if the government decides that it cannot be  
25 produced the government will so advise the Court and then

1 we'll have to proceed from there.

2 Anything else? Thank you.

3 MR. GILLICE: Your Honor, just to --

4 [Brief pause.]

5 THE COURT: My clerk says there's another issue  
6 regarding the speedy trial?

7 MR. GILLICE: Yes, your Honor. I apologize. Your  
8 Honor, as the Court knows the government has filed a motion  
9 under IEEPA. We reasonably believe that that does toll the  
10 Speedy Trial Act until the Court acts on that motion as  
11 well. But I wanted to make sure that that was clear on the  
12 record in this case. In addition, we reasonably may have  
13 some plea negotiations, whether or not they are fruitful we  
14 don't know, and the government is currently as the Court  
15 knows finishing discovery in this case.

16 THE COURT: Response.

17 MR. JONES: We have no objection to tolling of the  
18 Speedy Trial Act pending the disposition of the IEEPA  
19 section of the motion.

20 THE COURT: Very well. Based upon that concession  
21 the speedy trial clock will be tolled until that  
22 determination is made. Thank you.

23 MR. GILLICE: Thank you.

24 [Thereupon, the proceedings adjourned at 3:49  
25 p.m.]

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CERTIFICATE

I, Cathryn J. Jones, an Official Court Reporter for the United States District Court of the District of Columbia, do hereby certify that I reported, by machine shorthand, the proceedings had and testimony adduced in the above case.

I further certify that the foregoing 31 pages constitute the official transcript of said proceedings as transcribed from my machine shorthand notes.

In witness whereof, I have hereto subscribed my name, this the 29th day of August, 2017.

/s/\_Cathryn J. Jones  
Cathryn J. Jones, RPR  
Official Court Reporter



**MR. GILLICE:** [26] 3/5 6/15 6/23 7/19  
8/14 10/8 10/21 11/3 11/17 11/21 12/3  
12/10 12/25 14/18 15/18 20/4 20/8  
20/14 23/3 23/7 23/15 24/6 29/18 31/2  
31/6 31/22  
**MR. JONES:** [21] 3/10 3/16 4/6 5/3  
6/6 16/16 17/3 18/6 19/6 19/14 19/21  
20/21 22/7 22/19 23/5 25/2 27/9 28/3  
28/8 29/15 31/16  
**MR. PALAZZO:** [1] 3/9  
**THE COURT:** [43]  
**THE DEPUTY CLERK:** [1] 3/1

'13 [1] 21/10  
'15 [1] 21/10

.x [1] 1/6

/s [1] 32/13

**1**

**1400** [1] 1/16  
**16** [6] 3/25 28/17 29/4 29/9 29/17  
30/22  
**17-46** [2] 1/4 3/4  
**1875** [1] 1/20

**2**

**20001** [1] 2/3  
**20006** [1] 1/21  
**2012** [1] 21/9  
**2016** [1] 21/10  
**2017** [2] 1/5 32/11  
**20530** [2] 1/14 1/17  
**28** [1] 1/5  
**29** [1] 4/20  
**29th** [1] 32/11

**3**

**31** [1] 32/7  
**333** [1] 2/2  
**3:04** [1] 1/6  
**3:49** [1] 31/24

**4**

**46** [2] 1/4 3/4

**5**

**555** [1] 1/14

**6**

**6521** [1] 2/2

**A**

**abide** [1] 9/8  
**able** [4] 8/6 10/25 11/1 12/21  
**about** [26] 4/22 7/16 9/23 10/11 12/4  
12/23 13/4 14/2 14/3 15/1 15/2 15/8  
15/9 16/1 16/6 17/18 18/5 19/11 20/24  
24/15 25/15 25/15 27/11 27/12 29/18  
30/12  
**above** [1] 32/6  
**absolutely** [2] 20/17 23/18

**accepted** [1] 22/4  
**access** [3] 10/10 37/1  
**Act** [2] 31/10 31/18  
**actions** [1] 9/2  
**acts** [3] 4/17 7/8 31/10  
**actually** [4] 8/17 13/14 15/4 20/25  
**addition** [1] 31/12  
**additional** [4] 10/2 11/19 12/9 12/23  
**address** [2] 7/21 28/7  
**adduced** [1] 32/5  
**adequately** [1] 7/21  
**adjourned** [1] 31/24  
**administrative** [1] 16/18  
**adopted** [1] 30/5  
**advancing** [1] 22/7  
**adversarial** [4] 25/16 25/25 26/17  
27/18  
**advise** [1] 30/25  
**affairs** [1] 5/6  
**affected** [1] 14/15  
**after** [1] 16/10  
**afternoon** [4] 3/6 3/9 3/10 3/11  
**afternoon's** [1] 3/2  
**against** [4] 7/14 8/13 13/13 17/6  
**agency** [8] 5/1 6/19 6/20 9/25 10/1  
10/3 16/6 19/1  
**agree** [2] 11/4 22/20  
**agreed** [2] 10/9 14/17  
**agreement** [1] 13/25  
**aided** [1] 2/7  
**air** [1] 17/11  
**all** [16] 4/5 5/14 5/18 7/23 10/15 10/22  
11/6 11/12 14/21 17/1 17/18 22/9 23/6  
24/18 25/5 29/17  
**allegations** [3] 4/4 4/6 6/12  
**alleged** [3] 6/9 6/15 7/8  
**allegedly** [3] 16/24 18/2 23/6  
**alleges** [1] 4/21  
**allowed** [2] 25/12 27/15  
**along** [2] 3/6 3/12  
**already** [5] 12/6 14/8 14/20 20/15  
24/21  
**also** [1] 11/6  
**although** [1] 23/21  
**always** [1] 8/3  
**am** [2] 18/23 23/3  
**AMERICA** [1] 1/3  
**amiss** [1] 24/16  
**amongst** [1] 13/8  
**analogous** [1] 8/14  
**analysis** [2] 5/14 21/11  
**another** [2] 12/24 31/5  
**answer** [4] 5/12 12/11 12/14 12/15  
**answered** [1] 24/9  
**answers** [1] 11/23  
**anticipate** [1] 6/17  
**any** [14] 5/17 8/8 10/24 11/25 13/5  
13/8 15/8 21/24 23/17 24/4 24/10  
24/12 24/22 29/21  
**anything** [6] 13/11 14/25 18/17 20/19  
22/22 31/2  
**apart** [1] 13/5  
**apologize** [2] 27/11 31/7  
**APPEARANCES** [1] 1/11  
**apply** [1] 21/21  
**appropriate** [4] 6/12 7/21 8/17 23/19  
**appropriately** [1] 24/13

**are** [43]  
**arena** [1] 29/2  
**argument** [4] 13/3 14/16 19/10 27/14  
**argumentation** [2] 26/2 27/18  
**arm** [1] 6/19  
**articulated** [1] 9/23  
**as** [54]  
**ask** [10] 3/4 6/21 7/2 20/1 24/11 25/8  
26/1 26/1 27/13 27/20  
**asked** [2] 11/6 29/20  
**asking** [2] 3/21 3/22  
**aspect** [1] 3/19  
**assess** [2] 26/24 30/9  
**assessment** [2] 7/18 30/10  
**associated** [2] 4/23 21/3  
**association** [2] 21/5 21/8  
**assume** [7] 18/22 18/24 19/2 19/18  
23/21 26/18 29/12  
**assuming** [1] 29/14  
**attack** [4] 8/20 8/21 8/22 8/23  
**attempt** [1] 13/24  
**attempting** [1] 8/19  
**attorney** [2] 1/15 28/22  
**ATTORNEY'S** [1] 1/13  
**attorneys** [2] 11/8 11/8  
**August** [2] 1/5 32/11  
**AUSA** [2] 1/12 1/12  
**available** [2] 25/9 26/2  
**Avenue** [3] 1/16 1/20 2/2  
**aware** [1] 29/22  
**awareness** [2] 5/15 21/11

**B**

**back** [7] 6/3 11/7 17/5 17/24 21/9  
28/13 29/3  
**bare** [1] 16/4  
**Barkett** [2] 1/12 3/7  
**based** [4] 30/4 30/16 30/19 31/20  
**basic** [1] 25/21  
**basically** [3] 8/20 9/14 13/16  
**basis** [2] 9/10 26/8  
**be** [55]  
**became** [1] 26/5  
**because** [19] 4/16 5/17 6/8 6/10 8/23  
15/9 15/24 16/7 17/1 17/14 20/22  
23/14 24/17 25/17 29/2 29/11 29/11  
29/20 30/1  
**been** [12] 4/15 7/14 8/9 8/19 11/10  
11/16 11/20 12/2 13/23 15/9 19/18  
30/17  
**before** [5] 1/9 12/19 12/20 16/18 28/15  
**behalf** [2] 3/7 3/12  
**behind** [1] 15/22  
**being** [4] 23/14 25/16 27/11 28/10  
**believe** [8] 6/25 14/4 14/5 14/20 19/25  
20/15 20/21 31/9  
**believed** [1] 19/14  
**believes** [1] 13/11  
**between** [3] 11/7 14/22 17/24  
**biases** [1] 15/22  
**big** [1] 5/10  
**bit** [2] 16/6 17/16  
**bones** [1] 16/4  
**both** [2] 29/6 30/20  
**bought** [1] 13/22  
**Bowker** [2] 1/19 3/13  
**Brady** [9] 3/25 22/19 24/20 28/16 29/4

**B**  
Brady... [4] 29/9 29/18 29/21 30/23  
brief [2] 8/16 31/4  
broadly [1] 19/15  
brother's [1] 10/18  
brought [1] 17/6  
burdensome [1] 21/20  
business [5] 5/6 5/13 9/8 21/3 21/13  
buy [1] 13/18

**C**  
called [1] 21/7  
calling [2] 6/17 28/12  
came [1] 17/6  
can [11] 12/5 14/10 15/6 15/6 16/18  
17/8 17/11 22/3 23/16 25/25 26/7  
can't [5] 8/21 8/22 15/8 21/13 23/8  
cannot [2] 12/4 30/24  
careful [1] 11/22  
cart [1] 28/14  
case [30] 3/24 5/21 5/24 7/12 7/25 8/3  
8/15 8/18 8/18 9/18 9/21 16/12 16/15  
16/19 16/25 17/18 21/1 21/22 23/18  
24/5 24/20 25/14 26/6 26/21 27/6 27/8  
30/6 31/12 31/15 32/6  
case-in-chief [1] 3/24  
cases [3] 8/16 27/16 27/17  
Cathryn [4] 2/1 32/2 32/13 32/14  
cause [2] 20/6 26/14  
caused [1] 9/14  
certain [5] 9/24 27/8 29/21 30/5 30/13  
certainly [3] 14/10 20/15 20/16  
CERTIFICATE [1] 32/1  
certify [2] 32/4 32/7  
cetera [2] 15/25 15/25  
challenge [2] 16/13 16/16  
chance [3] 12/18 16/25 18/23  
charge [1] 8/21  
charged [6] 5/22 7/7 7/12 9/22 13/13  
15/17  
charges [9] 3/20 4/1 4/9 4/11 7/13  
7/15 17/6 18/3 19/3  
checks [1] 7/3  
chief [1] 3/24  
choose [1] 8/25  
chose [4] 8/24 9/1 21/12 26/18  
circumscribing [1] 9/18  
circumstances [3] 30/5 30/13 30/16  
circumvented [1] 19/5  
cited [1] 8/16  
claim [1] 8/13  
classified [29] 11/16 11/21 11/25 12/2  
12/13 12/13 12/14 12/18 12/24 12/25  
13/6 22/22 23/6 23/8 23/11 23/14  
23/17 24/19 25/4 25/5 25/15 26/3  
26/11 26/14 27/2 29/7 29/11 30/12  
30/21  
clear [4] 9/19 21/19 27/12 31/11  
clerk [1] 31/5  
client [3] 3/16 24/22 28/23  
clock [1] 31/21  
collaterally [1] 8/20  
colleagues [1] 3/13  
COLUMBIA [2] 1/2 32/4  
come [6] 9/20 15/23 16/2 16/3 28/13  
29/3  
coming [1] 23/15

communications [1] 11/7  
companies [9] 7/9 9/9 10/9 10/4  
21/13  
company [4] 15/2 15/3 15/7 25/20  
complex [3] 22/2 22/5 22/15  
complicated [1] 22/10  
computer [1] 2/7  
computer-aided [1] 2/7  
conceivably [5] 10/7 12/23 26/18  
29/25 30/9  
concern [2] 22/20 29/18  
concerned [1] 25/14  
concession [1] 31/20  
concessions [2] 24/14 28/7  
conclude [2] 27/7 30/18  
conclusive [1] 16/19  
conclusively [2] 17/8 17/11  
conduct [2] 7/19 21/3  
confidential [1] 5/13  
conflating [1] 25/20  
consequences [3] 23/13 24/4 26/20  
consider [1] 7/17  
considering [3] 7/12 7/13 28/6  
Consistent [1] 24/24  
conspiracy [9] 4/12 4/18 7/9 13/14  
13/16 13/18 13/25 17/21 21/23  
conspired [1] 13/24  
conspiring [2] 5/9 5/22  
constitute [1] 32/8  
Constitution [1] 2/2  
contained [2] 23/21 30/21  
context [7] 6/3 6/4 10/7 16/14 18/4  
19/10 30/3  
continued [1] 9/9  
continues [1] 4/10  
contrary [1] 19/6  
conversation [1] 20/16  
convicted [2] 8/19 16/15  
conviction [1] 16/16  
convince [1] 4/15  
correct [3] 9/11 11/18 23/5  
correction [1] 15/20  
correspondence [4] 14/8 14/14 14/21  
14/22  
could [8] 7/20 14/13 17/3 18/22 21/14  
26/18 27/9 28/1  
counsel [6] 9/24 13/2 14/9 16/10  
20/17 24/10  
counsels [1] 14/23  
count [3] 4/11 13/15 17/21  
course [4] 7/5 9/16 13/20 17/23  
court [24] 1/1 2/1 2/1 2/2 3/21 7/20  
8/16 8/21 11/17 12/6 13/2 14/8 15/23  
16/2 16/3 25/8 29/12 30/25 31/8 31/10  
31/14 32/2 32/3 32/14  
covered [1] 22/11  
CR [1] 1/4  
created [1] 19/1  
crime [2] 8/8 16/15  
crimes [1] 15/16  
criminal [2] 3/4 16/19  
culpability [1] 6/15  
culpable [1] 7/19  
currently [2] 12/20 31/14  
cut [1] 21/19

**D** Page 34 of 40  
D.C [2] 1/5 2/3  
David [2] 1/19 3/13  
day [1] 32/11  
DC [3] 1/14 1/17 1/21  
deal [3] 23/18 24/13 25/6  
dealing [1] 20/7  
dealings [1] 4/22  
decide [7] 7/24 17/13 24/2 26/13  
26/19 28/5 28/17  
decided [2] 16/14 27/6  
decides [1] 30/24  
decision [4] 5/16 23/15 24/4 29/13  
deems [1] 6/12  
defend [1] 8/13  
defendant [20] 1/6 1/18 6/21 7/14 9/4  
9/13 9/20 10/10 11/8 11/9 13/6 13/14  
13/24 14/3 14/14 14/22 15/23 20/6  
20/10 29/21  
defendant's [6] 6/15 10/16 14/6 14/24  
15/12 15/12  
defended [1] 13/12  
defense [26] 3/19 4/1 5/19 8/11 9/24  
12/3 13/2 14/9 15/12 16/10 17/16  
20/17 21/14 22/15 23/23 24/10 26/23  
26/25 27/2 27/3 27/5 27/6 30/1 30/5  
30/7 30/14  
definitive [1] 12/19  
defraud [8] 4/12 5/9 5/19 5/22 13/15  
13/16 13/24 17/22  
defrauded [1] 20/14  
degree [3] 5/16 27/19 28/7  
deliberative [1] 28/23  
delisted [4] 9/6 13/22 13/23 18/12  
delisting [1] 10/17  
demonstratively [1] 25/19  
denied [1] 30/19  
DEPARTMENT [3] 1/16 6/19 17/5  
describe [2] 5/23 19/23  
described [1] 18/8  
designate [1] 21/12  
designated [13] 4/15 4/16 6/22 6/23  
6/24 9/4 9/17 15/3 15/5 15/7 15/9  
15/24 17/25  
designation [22] 3/16 7/10 7/11 7/13  
7/16 7/18 8/5 9/5 9/8 9/10 10/16 10/17  
15/15 15/18 15/20 15/21 15/22 16/5  
16/13 17/1 17/12 17/15  
designations [1] 16/11  
desire [1] 3/15  
detail [2] 5/18 18/24  
determination [7] 16/18 16/21 23/25  
24/2 26/10 27/3 31/22  
determinations [1] 29/15  
determine [2] 7/3 29/1  
determines [1] 22/22  
determining [2] 9/2 21/23  
develop [1] 5/18  
did [7] 8/25 11/12 16/15 17/18 19/5  
21/17 26/21  
didn't [2] 9/1 29/5  
difference [1] 14/3  
different [1] 23/2  
difficult [5] 21/20 22/3 22/5 22/16  
22/18  
disagree [1] 10/11  
disclose [1] 28/1

<p><b>D</b></p> <p>disclosed [1] 21/8</p> <p>discoverable [3] 25/6 29/1 30/22</p> <p>discovery [7] 8/12 18/5 19/17 30/9 30/15 30/19 31/15</p> <p>discriminatory [1] 17/10</p> <p>discussions [1] 15/8</p> <p>disposition [1] 31/18</p> <p>distinguish [1] 16/12</p> <p><b>DISTRICT [6]</b> 1/1 1/2 1/10 2/2 32/3 32/3</p> <p>do [26] 6/13 6/14 8/24 8/25 9/8 9/9 12/16 12/19 12/21 13/14 16/2 16/3 16/11 17/7 20/11 21/13 24/3 24/5 24/11 24/15 24/17 25/4 26/6 26/7 29/19 32/4</p> <p>Docket [1] 1/4</p> <p>document [1] 22/10</p> <p>documents [16] 5/23 11/11 11/13 13/4 13/7 15/13 18/9 18/11 21/10 21/21 23/7 23/9 28/12 28/15 28/25 29/17</p> <p>does [11] 4/17 8/1 13/18 14/4 14/5 14/24 16/7 17/13 17/24 20/2 31/9</p> <p>doesn't [3] 15/1 15/9 17/9</p> <p>doing [3] 6/1 14/21 19/8</p> <p>don't [15] 4/4 5/16 6/13 13/19 14/4 15/10 18/17 22/9 26/16 27/24 28/21 29/22 29/22 29/24 31/14</p> <p>done [2] 10/12 30/18</p> <p>drabs [1] 25/17</p> <p>draw [1] 7/22</p> <p>drips [1] 25/17</p> <p>due [1] 25/10</p> <p>during [1] 3/23</p>	<p>et [2] 15/25 15/25</p> <p>even [6] 4/8 7/16 8/7 15/14 27/28 28/21</p> <p>eventually [1] 18/10</p> <p>every [1] 3/19</p> <p>everybody [1] 16/7</p> <p>evidence [12] 4/5 4/8 6/10 6/11 7/2 7/16 8/4 8/8 8/12 15/18 19/3 20/3</p> <p>evident [1] 5/21</p> <p>ex [7] 12/14 23/24 25/9 25/13 26/23 27/14 27/15</p> <p>ex parte [1] 26/23</p> <p>exact [1] 19/22</p> <p>exactly [3] 10/11 27/10 29/3</p> <p>example [2] 8/7 18/20</p> <p>exculpatory [1] 23/11</p> <p>existed [1] 21/24</p> <p>exists [1] 22/14</p> <p>expeditiously [1] 12/21</p> <p>extensive [1] 5/15</p> <p>extent [7] 3/17 25/8 25/10 25/25 27/22 30/2 30/15</p> <p>extremely [1] 26/5</p>	<p>fragments [1] 4/19</p> <p>fraud [9] 1/9 9/13 22 18/2 17/19 19/13 22</p> <p>fraudulent [2] 10/1 25/1</p> <p>frequently [1] 24/5</p> <p>fruitful [1] 31/13</p> <p>full [1] 6/3</p> <p>function [1] 20/10</p> <p>functions [15] 4/13 5/20 5/23 5/24 17/22 18/6 18/18 18/25 19/4 19/6 19/14 19/24 20/3 20/13 20/20</p> <p>fundamentally [1] 5/8</p> <p>further [5] 4/17 7/8 16/9 20/16 32/7</p> <p>furtherance [1] 7/8</p>
<p><b>E</b></p> <p>earlier [1] 16/4</p> <p>easy [2] 21/19 22/8</p> <p>effect [1] 19/8</p> <p>either [5] 12/14 23/12 29/8 29/9 29/10</p> <p>element [8] 7/11 7/17 8/7 15/16 15/21 16/19 17/8 17/11</p> <p>elements [1] 8/9</p> <p>else [5] 13/25 14/25 15/11 24/16 31/2</p> <p>emails [1] 13/8</p> <p>emerged [1] 26/5</p> <p>end [1] 11/10</p> <p>enforcement [2] 19/16 19/24</p> <p>engage [1] 27/21</p> <p>engaged [2] 4/14 9/6</p> <p>engagement [1] 5/5</p> <p>enough [3] 13/25 14/1 28/18</p> <p>entails [1] 26/12</p> <p>enter [1] 7/1</p> <p>entertain [1] 25/13</p> <p>entire [3] 18/1 19/11 19/11</p> <p>entities [4] 4/23 9/9 21/2 21/5</p> <p>entitled [5] 8/12 20/19 23/12 24/17 28/8</p> <p>episode [1] 19/11</p> <p>errors [1] 25/21</p> <p>especially [1] 17/25</p> <p>Esquire [3] 1/18 1/19 1/19</p> <p>essence [4] 3/15 9/1 10/9 12/6</p> <p>essential [2] 27/4 27/4</p> <p>essentially [1] 26/11</p> <p>establish [3] 17/8 17/11 21/14</p>	<p><b>F</b></p> <p>fact [16] 13/19 15/5 15/6 15/6 15/20 21/12 24/1 24/1 24/20 24/25 25/1 26/25 27/5 29/14 30/20 30/22</p> <p>facts [1] 25/23</p> <p>factual [1] 25/21</p> <p>fair [1] 29/24</p> <p>false [9] 4/20 10/1 10/6 10/8 11/3 14/1 20/13 25/2 25/20</p> <p>falsehoods [1] 5/3</p> <p>familiar [1] 18/23</p> <p>faulty [1] 25/19</p> <p>featured [1] 21/7</p> <p>Federal [2] 6/25 7/1</p> <p>felon [1] 16/14</p> <p>felony [4] 8/19 8/20 9/2 16/16</p> <p>felt [1] 29/10</p> <p>few [1] 4/18</p> <p>fight [1] 9/5</p> <p>file [1] 30/22</p> <p>filed [2] 7/14 31/8</p> <p>files [2] 3/18 13/6</p> <p>filing [7] 11/16 11/21 12/2 12/24 20/24 27/12 27/17</p> <p>filings [2] 25/9 26/2</p> <p>financial [3] 4/22 15/24 16/1</p> <p>find [1] 17/10</p> <p>finishing [1] 31/15</p> <p>firm [1] 5/10</p> <p>firms [1] 20/7</p> <p>first [2] 17/21 28/25</p> <p>flavor [1] 28/23</p> <p>flawed [1] 25/19</p> <p>follow [1] 8/2</p> <p>followed [1] 16/17</p> <p>foregoing [1] 32/7</p> <p>form [3] 25/9 26/9 27/25</p> <p>forth [6] 6/3 7/24 11/7 17/5 17/24 18/25</p> <p>forum [1] 12/15</p> <p>forward [5] 3/4 3/23 9/3 13/21 14/1</p> <p>four [1] 5/10</p> <p>Fourth [1] 1/14</p>	<p><b>G</b></p> <p>gave [1] 21/9</p> <p>general [3] 6/18 6/20 27/11</p> <p>get [7] 9/6 13/21 18/10 18/12 20/6 20/7 22/9</p> <p>gets [1] 18/20</p> <p>getting [2] 10/14 13/21</p> <p>Gillice [3] 1/12 3/6 28/13</p> <p>give [3] 11/12 26/22 26/23</p> <p>gives [1] 26/11</p> <p>Giving [1] 5/12</p> <p>global [3] 4/16 6/24 18/1</p> <p>go [5] 7/6 14/24 15/10 29/4 29/14</p> <p>goes [2] 20/22 27/20</p> <p>going [14] 8/3 9/2 10/5 12/9 15/23 16/2 18/9 18/18 20/25 22/21 23/1 28/11 29/2 30/6</p> <p>gone [1] 10/12</p> <p>good [6] 3/6 3/9 3/10 3/11 13/24 14/1</p> <p>gotten [2] 10/13 25/18</p> <p>government [57]</p> <p>government's [8] 5/3 5/8 5/24 17/7 25/15 25/24 27/8 30/20</p> <p>great [2] 18/24 22/13</p> <p>greatest [1] 25/8</p> <p>grounds [1] 28/22</p> <p>guarantee [1] 8/3</p> <p>guess [5] 6/8 11/15 20/11 24/15 29/13</p> <p><b>H</b></p> <p>had [12] 4/16 7/3 8/18 8/23 12/17 12/18 16/25 18/23 24/5 26/24 27/3 32/5</p> <p>HALE [1] 1/20</p> <p>hand [1] 30/14</p> <p>happen [1] 28/11</p> <p>happy [2] 20/16 24/11</p> <p>harm [1] 26/14</p> <p>harmful [1] 28/1</p> <p>has [23] 6/2 6/11 8/10 10/12 11/10 11/16 11/20 12/2 12/6 13/13 14/8 15/21 16/21 16/25 18/8 22/21 24/10 24/15 26/6 28/16 29/21 30/15 31/8</p> <p>have [74]</p> <p>haven't [4] 12/17 12/18 14/20 18/23</p> <p>he [54]</p> <p>he'd [2] 23/12 23/12</p> <p>he's [3] 7/19 9/21 15/16</p> <p>hear [3] 4/3 6/5 16/10</p> <p>heard [1] 25/3</p> <p>HEARING [1] 1/8</p> <p>hears [1] 14/7</p> <p>heavily [1] 18/13</p>

<p><b>H</b></p> <p>help [3] 5/18 21/14 24/8</p> <p>here [8] 16/22 17/17 21/19 22/21 27/21 28/9 28/11 28/21</p> <p>hereby [1] 32/4</p> <p>hereto [1] 32/10</p> <p>Hezbollah [9] 4/17 4/24 9/21 9/22 15/25 16/1 17/25 18/15 19/12</p> <p>hide [1] 21/4</p> <p>highly [1] 26/14</p> <p>him [2] 17/6 20/7</p> <p>himself [4] 9/6 13/21 16/24 18/11</p> <p>hiring [1] 5/10</p> <p>his [17] 3/19 5/5 5/6 5/10 5/16 10/17 10/18 10/20 14/5 14/6 14/7 14/15 14/23 14/25 15/10 21/4 21/8</p> <p>history [1] 4/19</p> <p>honing [1] 6/1</p> <p>Honor [29] 3/2 3/11 3/17 6/16 7/20 8/15 11/10 12/5 12/11 13/1 13/10 14/19 15/19 16/17 17/13 20/5 22/20 23/4 23/16 24/7 25/3 25/22 26/1 27/10 28/4 29/19 31/3 31/7 31/8</p> <p>HONORABLE [1] 1/9</p> <p>hopefully [2] 8/1 12/20</p> <p>horse [1] 28/15</p> <p>how [4] 13/4 16/11 21/21 28/5</p>	<p>Instructions [3] 7/22 8/2 8/2</p> <p>intend [6] 4/8 6/14 20/2 20/11 21/9 25/4</p> <p>intended [1] 25/11</p> <p>intending [1] 5/19</p> <p>intends [2] 4/8 29/16</p> <p>intent [8] 14/5 14/15 14/25 15/10 18/20 19/9 20/23 21/24</p> <p>internal [5] 13/4 13/7 13/9 15/8 15/11</p> <p>internally [1] 22/16</p> <p>interrogate [1] 25/23</p> <p>intersects [1] 23/17</p> <p>introduce [10] 4/5 4/8 6/10 7/16 10/25 11/1 15/17 20/3 24/22 26/19</p> <p>introduced [2] 12/3 27/9</p> <p>introduces [1] 8/8</p> <p>introducing [1] 26/9</p> <p>involved [2] 9/14 26/3</p> <p>is [92]</p> <p>isn't [3] 6/9 7/15 8/14</p> <p>issue [7] 7/6 9/11 9/13 21/11 21/11 30/18 31/5</p> <p>issued [1] 7/4</p> <p>issues [2] 4/8 26/2</p> <p>it [66]</p> <p>it's [15] 6/2 6/19 7/17 11/15 15/16 15/22 17/16 18/3 19/16 22/10 22/11 28/2 28/22 28/23 30/3</p> <p>item [1] 14/3</p> <p>items [1] 24/10</p> <p>its [13] 3/23 4/12 5/20 5/22 6/20 8/9 17/22 18/8 18/18 21/1 27/1 29/11 30/14</p> <p>itself [4] 7/10 15/16 22/6 27/12</p> <p>IV [2] 27/13 27/14</p>	<p>leaves [1] 27/17</p> <p>left [1] 26/10</p> <p>legal [2] 26/2 27/18</p> <p>legitimacy [1] 8/5</p> <p>legitimate [1] 18/6</p> <p>let [6] 6/5 6/6 20/1 20/2 23/22 29/12</p> <p>level [1] 5/5</p> <p>Lewis [2] 8/17 16/17</p> <p>Libby [3] 24/5 26/6 26/21</p> <p>license [2] 20/6 20/7</p> <p>licenses [2] 7/4 16/6</p> <p>lied [2] 4/22 14/3</p> <p>like [1] 29/20</p> <p>limited [1] 10/4</p> <p>list [5] 3/22 18/1 18/14 18/15 21/13</p> <p>listen [1] 8/2</p> <p>literally [1] 5/7</p> <p>litigation [1] 27/20</p> <p>little [1] 16/6</p> <p>log [1] 28/20</p> <p>logical [1] 14/15</p> <p>long [1] 4/19</p> <p>look [9] 6/3 18/24 22/21 24/11 25/5 28/25 29/2 29/4 29/23</p> <p>looking [1] 3/24</p>
<p><b>I</b></p> <p>I'd [2] 15/20 24/2</p> <p>I'll [4] 4/3 6/6 20/2 30/17</p> <p>I'm [9] 7/24 8/4 11/24 19/1 20/16 22/25 24/15 28/10 28/10</p> <p>I've [1] 12/6</p> <p>i.e [1] 13/15</p> <p>ICTC [6] 21/7 21/8 21/9 21/12 21/15 22/11</p> <p>identify [1] 3/5</p> <p>IEEPA [13] 23/13 24/2 24/6 25/7 25/11 25/12 26/4 26/5 27/20 28/5 30/3 31/9 31/18</p> <p>implicate [1] 12/12</p> <p>implied [1] 23/17</p> <p>important [3] 5/25 6/3 21/22</p> <p>impossible [2] 18/3 30/1</p> <p>in-person [1] 5/11</p> <p>inappropriate [1] 6/13</p> <p>include [1] 23/11</p> <p>includes [1] 4/20</p> <p>Including [1] 23/6</p> <p>inconsistent [1] 5/8</p> <p>incorrect [2] 17/12 17/17</p> <p>incredibly [1] 21/20</p> <p>inculpatory [1] 23/20</p> <p>indeed [2] 8/25 18/19</p> <p>independent [2] 16/21 17/9</p> <p>indictment [11] 3/20 4/1 4/4 4/11 4/21 6/9 6/12 7/7 17/21 19/23 21/6</p> <p>individuals [1] 4/23</p> <p>inextricably [1] 4/9</p> <p>inform [2] 12/9 12/22</p> <p>information [63]</p> <p>initially [1] 23/1</p> <p>inside [1] 18/18</p> <p>instance [2] 20/25 27/17</p> <p>Instead [1] 6/2</p> <p>instruct [1] 7/22</p>	<p><b>J</b></p> <p>Jacqueline [2] 1/12 3/7</p> <p>Jones [6] 1/18 2/1 3/11 32/2 32/13 32/14</p> <p>Joseph [2] 1/15 3/7</p> <p>JUDGE [2] 1/9 1/10</p> <p>judges [1] 27/16</p> <p>judicial [3] 16/21 17/1 17/9</p> <p>jury [7] 7/17 7/21 7/22 7/25 8/1 22/4 22/4</p> <p>just [11] 6/18 9/24 12/17 13/2 16/6 17/18 19/24 20/1 28/10 29/20 31/3</p> <p>JUSTICE [2] 1/16 17/5</p> <p><b>K</b></p> <p>KASSIM [3] 1/5 3/3 3/12</p> <p>key [1] 21/1</p> <p>know [23] 5/9 8/1 9/16 13/9 14/11 15/1 15/1 15/2 15/7 15/9 16/5 22/1 22/14 23/23 25/12 26/15 27/24 28/21 29/13 29/22 29/22 30/15 31/14</p> <p>knowledge [2] 11/16 14/25</p> <p>knows [3] 16/7 31/8 31/15</p> <p><b>L</b></p> <p>last [1] 25/18</p> <p>law [4] 9/18 15/11 17/20 21/25</p> <p>lawful [12] 4/12 5/20 5/24 17/22 18/18 18/25 19/4 19/23 20/3 20/9 20/12 20/20</p> <p>least [2] 26/2 26/21</p>	<p><b>M</b></p> <p>machine [3] 2/7 32/4 32/9</p> <p>made [12] 9/25 10/5 10/21 10/25 11/16 19/18 20/13 24/15 24/23 28/6 29/13 31/22</p> <p>majority [1] 18/11</p> <p>make [12] 12/4 12/19 15/13 15/20 23/25 24/2 25/9 26/1 26/10 27/3 29/14 31/11</p> <p>makes [1] 14/2</p> <p>making [1] 4/13</p> <p>manner [2] 26/17 26/24</p> <p>many [2] 17/15 27/16</p> <p>Mat [1] 3/11</p> <p>material [3] 3/25 4/13 25/6</p> <p>materially [3] 4/20 9/21 9/22</p> <p>materials [5] 10/15 17/15 28/17 29/4 29/18</p> <p>matter [4] 3/3 14/4 14/5 17/9</p> <p>matters [1] 14/6</p> <p>Matthew [1] 1/18</p> <p>may [9] 4/4 7/17 12/16 12/22 16/9 23/21 23/24 30/3 31/12</p> <p>maybe [5] 19/1 22/25 26/17 26/19 30/11</p> <p>me [18] 6/5 8/10 12/1 12/9 12/20 12/22 12/24 19/20 20/1 22/1 22/18 23/22 23/24 26/16 26/18 26/22 26/23 30/17</p> <p>mean [5] 19/17 20/19 22/13 23/10 30/11</p> <p>meaningful [1] 16/20</p> <p>means [1] 18/10</p> <p>meetings [1] 5/11</p> <p>Meltzer [2] 1/19 3/13</p> <p>memorandum [1] 13/9</p> <p>memos [2] 18/13 18/13</p> <p>meshed [1] 17/15</p> <p>midst [1] 17/4</p> <p>might [5] 13/5 15/10 24/7 24/25 29/25</p> <p>millions [1] 5/10</p> <p>mind [3] 9/4 14/6 14/7</p>

<p><b>M</b></p> <p>minimum [1] 21/16</p> <p>misrepresentations [1] 4/13</p> <p>mixing [1] 25/20</p> <p>more [4] 5/17 20/20 27/11 28/13</p> <p>most [1] 8/17</p> <p>motion [9] 3/14 3/15 12/20 17/14 27/15 30/19 31/8 31/10 31/19</p> <p>motions [2] 1/8 13/3</p> <p>motive [4] 8/7 8/8 8/11 8/14</p> <p>moving [1] 17/17</p> <p>Mr [16] 3/21 3/25 4/11 5/5 5/9 5/19 16/23 17/24 18/11 18/13 18/20 20/22 21/1 21/23 22/8 25/20</p> <p>Mr. [6] 4/22 18/20 19/8 21/8 21/17 28/13</p> <p>Mr. Gillice [1] 28/13</p> <p>Mr. Tajideen [4] 4/22 19/8 21/8 21/17</p> <p>Mr. Tajideen's [1] 18/20</p> <p>much [1] 5/18</p> <p>must [1] 16/19</p> <p>my [8] 3/12 9/4 11/6 11/22 20/11 31/5 32/9 32/10</p>	<p>offering [1] 5/11</p> <p>OFFICE [1] 37</p> <p>officer [2] 16/21 17/1</p> <p>official [6] 2/1 11/6 14/21 32/2 32/8 32/14</p> <p>officials [1] 5/12</p> <p>oftentimes [1] 25/19</p> <p>Okay [2] 20/18 24/14</p> <p>omit [1] 6/11</p> <p>one [14] 4/11 8/17 10/23 13/1 13/15 13/20 15/1 15/19 20/5 21/6 21/15 24/7 28/9 29/15</p> <p>ones [1] 7/7</p> <p>only [6] 3/22 8/25 11/8 13/7 14/6 14/11</p> <p>opening [1] 5/6</p> <p>opportunity [1] 8/23</p> <p>oral [1] 13/3</p> <p>order [8] 6/4 8/12 15/13 17/14 19/7 27/16 30/7 30/14</p> <p>organizations [1] 4/24</p> <p>other [9] 4/25 10/6 10/16 13/1 13/5 15/4 17/16 24/8 24/25</p> <p>otherwise [2] 25/6 29/1</p> <p>our [7] 5/4 8/16 9/16 9/18 13/7 19/10 28/15</p> <p>out [7] 9/7 13/2 14/8 14/9 17/10 18/3 25/18</p> <p>over [9] 4/13 5/1 5/6 11/11 11/14 17/22 17/24 25/18 28/19</p> <p>overt [2] 4/17 7/8</p> <p>owns [1] 15/3</p>	<p>point [6] 8/16 9/19 13/2 15/13 17/23 18/18</p> <p>Page 37 of 40</p> <p>pointed [2] 14/8 14/9</p> <p>pointers [1] 29/20</p> <p>points [1] 15/1</p> <p>position [8] 9/23 10/8 11/2 17/7 23/2 24/24 27/24 27/25</p> <p>possible [3] 25/8 25/10 27/22</p> <p>potential [2] 7/15 30/7</p> <p>potentially [3] 26/14 28/1 29/17</p> <p>powerful [1] 21/14</p> <p>preceded [1] 11/9</p> <p>predicate [1] 19/2</p> <p>prepared [6] 6/2 7/4 24/22 26/22 26/23 28/2</p> <p>preparing [3] 3/19 3/25 17/16</p> <p>present [5] 3/12 6/14 16/3 19/3 22/3</p> <p>preserve [2] 25/10 27/1</p> <p>preserved [2] 25/25 27/19</p> <p>press [2] 4/10 15/25</p> <p>presume [1] 9/20</p> <p>presumably [1] 13/7</p> <p>presumes [1] 13/20</p> <p>pretend [1] 9/1</p> <p>previously [3] 8/19 8/23 16/14</p> <p>prior [3] 9/2 14/23 20/7</p> <p>privilege [5] 12/13 28/18 28/22 28/24 29/11</p> <p>privileged [12] 10/15 10/21 11/13 18/9 22/23 23/7 24/9 24/12 28/12 28/20 29/3 29/17</p> <p>privileges [1] 22/24</p> <p>probably [2] 28/19 30/1</p> <p>proceed [2] 28/5 31/1</p> <p>proceeding [5] 8/22 12/25 18/2 20/23 23/24</p> <p>proceedings [4] 2/7 31/24 32/5 32/8</p> <p>process [13] 10/13 14/21 25/7 25/7 25/10 25/17 25/25 26/5 27/11 27/18 27/21 28/23 29/18</p> <p>processes [1] 23/19</p> <p>produce [7] 22/19 24/3 24/21 26/17 26/17 28/2 29/9</p> <p>produced [7] 2/7 11/20 12/10 12/10 23/14 30/24 30/25</p> <p>producible [3] 24/1 24/1 29/8</p> <p>production [1] 29/10</p> <p>prominently [1] 21/6</p> <p>proof [2] 9/16 9/18</p> <p>proposition [1] 22/4</p> <p>protect [1] 25/11</p> <p>protecting [1] 25/11</p> <p>prove [4] 8/6 9/20 13/23 15/21</p> <p>proven [3] 8/10 13/12 25/19</p> <p>provide [3] 14/18 27/2 27/5</p> <p>provided [10] 5/17 10/1 10/2 10/19 12/1 12/7 14/20 14/20 18/5 18/8</p> <p>providing [2] 15/24 28/20</p> <p>proving [1] 19/11</p> <p>public [1] 11/15</p> <p>pull [2] 18/3 18/3</p> <p>pulled [1] 17/10</p> <p>purpose [1] 6/20</p> <p>purposes [1] 8/20</p> <p>put [6] 7/24 10/6 13/25 19/22 21/12 30/7</p> <p>putting [3] 3/23 13/21 28/14</p>
<p><b>N</b></p> <p>N.W [1] 2/2</p> <p>name [1] 32/11</p> <p>names [1] 25/20</p> <p>national [3] 1/13 26/15 26/15</p> <p>naturally [1] 25/22</p> <p>nature [6] 7/12 7/13 13/9 23/22 27/2 29/11</p> <p>necessarily [2] 4/5 6/9</p> <p>need [4] 5/17 5/23 12/21 13/4</p> <p>needs [4] 12/24 13/11 13/12 30/18</p> <p>negate [2] 8/5 8/13</p> <p>negotiations [1] 31/13</p> <p>never [3] 15/3 15/5 15/7</p> <p>New [1] 1/16</p> <p>next [1] 11/5</p> <p>no [13] 1/4 7/22 8/3 8/21 10/22 10/22 13/23 14/3 16/5 18/7 23/4 29/18 31/17</p> <p>non [3] 10/15 11/13 18/9</p> <p>non-privileged [3] 10/15 11/13 18/9</p> <p>nonetheless [3] 7/17 9/7 27/2</p> <p>normally [1] 30/6</p> <p>not [87]</p> <p>notes [1] 32/9</p> <p>notice [4] 7/1 7/1 17/4 30/8</p> <p>now [3] 8/22 13/23 22/14</p> <p>number [3] 10/4 14/12 15/4</p> <p>NW [3] 1/14 1/16 1/20</p>	<p><b>P</b></p> <p>p.m [2] 1/6 31/25</p> <p>pages [1] 32/7</p> <p>Palazzo [2] 1/15 3/7</p> <p>Paragraph [1] 4/20</p> <p>part [7] 9/16 11/5 13/5 17/16 24/8 25/7 27/8</p> <p>parte [7] 12/14 23/24 25/9 25/13 26/23 27/14 27/15</p> <p>particular [4] 6/17 9/10 12/5 28/21</p> <p>particularly [1] 25/14</p> <p>parties [1] 3/4</p> <p>pause [1] 31/4</p> <p>pending [1] 31/18</p> <p>Pennsylvania [1] 1/20</p> <p>people [1] 22/17</p> <p>per [1] 15/1</p> <p>perhaps [1] 28/10</p> <p>period [4] 4/14 5/1 5/7 17/23</p> <p>permitted [2] 27/13 27/21</p> <p>person [2] 5/11 8/18</p> <p>personal [1] 5/6</p> <p>personnel [1] 13/8</p> <p>pertinent [2] 26/25 27/1</p> <p>petition [1] 10/17</p> <p>piece [2] 6/17 28/9</p> <p>pieces [1] 13/10</p> <p>place [1] 19/10</p> <p>Plaintiff [1] 1/3</p> <p>plan [1] 16/3</p> <p>play [2] 23/15 30/14</p> <p>plea [1] 31/13</p> <p>pleadings [1] 15/2</p> <p>please [1] 3/5</p>	<p><b>P</b></p> <p>probably [2] 28/19 30/1</p> <p>proceed [2] 28/5 31/1</p> <p>proceeding [5] 8/22 12/25 18/2 20/23 23/24</p> <p>proceedings [4] 2/7 31/24 32/5 32/8</p> <p>process [13] 10/13 14/21 25/7 25/7 25/10 25/17 25/25 26/5 27/11 27/18 27/21 28/23 29/18</p> <p>processes [1] 23/19</p> <p>produce [7] 22/19 24/3 24/21 26/17 26/17 28/2 29/9</p> <p>produced [7] 2/7 11/20 12/10 12/10 23/14 30/24 30/25</p> <p>producible [3] 24/1 24/1 29/8</p> <p>production [1] 29/10</p> <p>prominently [1] 21/6</p> <p>proof [2] 9/16 9/18</p> <p>proposition [1] 22/4</p> <p>protect [1] 25/11</p> <p>protecting [1] 25/11</p> <p>prove [4] 8/6 9/20 13/23 15/21</p> <p>proven [3] 8/10 13/12 25/19</p> <p>provide [3] 14/18 27/2 27/5</p> <p>provided [10] 5/17 10/1 10/2 10/19 12/1 12/7 14/20 14/20 18/5 18/8</p> <p>providing [2] 15/24 28/20</p> <p>proving [1] 19/11</p> <p>public [1] 11/15</p> <p>pull [2] 18/3 18/3</p> <p>pulled [1] 17/10</p> <p>purpose [1] 6/20</p> <p>purposes [1] 8/20</p> <p>put [6] 7/24 10/6 13/25 19/22 21/12 30/7</p> <p>putting [3] 3/23 13/21 28/14</p>
<p><b>O</b></p> <p>objection [1] 31/17</p> <p>obligation [8] 19/20 22/19 24/6 24/17 26/6 28/16 30/9 30/15</p> <p>obviously [14] 4/3 6/6 6/8 11/24 19/19 22/3 23/10 23/23 24/5 25/22 26/7 26/16 30/2 30/17</p> <p>occurred [2] 16/22 18/2</p> <p>OCTF [1] 21/9</p> <p>OFAC [63]</p> <p>OFAC's [7] 3/18 5/14 9/15 13/4 20/24 21/10 21/20</p> <p>offense [2] 17/9 17/12</p> <p>offenses [1] 7/12</p>	<p><b>O</b></p> <p>offering [1] 5/11</p> <p>OFFICE [1] 37</p> <p>officer [2] 16/21 17/1</p> <p>official [6] 2/1 11/6 14/21 32/2 32/8 32/14</p> <p>officials [1] 5/12</p> <p>oftentimes [1] 25/19</p> <p>Okay [2] 20/18 24/14</p> <p>omit [1] 6/11</p> <p>one [14] 4/11 8/17 10/23 13/1 13/15 13/20 15/1 15/19 20/5 21/6 21/15 24/7 28/9 29/15</p> <p>ones [1] 7/7</p> <p>only [6] 3/22 8/25 11/8 13/7 14/6 14/11</p> <p>opening [1] 5/6</p> <p>opportunity [1] 8/23</p> <p>oral [1] 13/3</p> <p>order [8] 6/4 8/12 15/13 17/14 19/7 27/16 30/7 30/14</p> <p>organizations [1] 4/24</p> <p>other [9] 4/25 10/6 10/16 13/1 13/5 15/4 17/16 24/8 24/25</p> <p>otherwise [2] 25/6 29/1</p> <p>our [7] 5/4 8/16 9/16 9/18 13/7 19/10 28/15</p> <p>out [7] 9/7 13/2 14/8 14/9 17/10 18/3 25/18</p> <p>over [9] 4/13 5/1 5/6 11/11 11/14 17/22 17/24 25/18 28/19</p> <p>overt [2] 4/17 7/8</p> <p>owns [1] 15/3</p>	<p><b>O</b></p> <p>point [6] 8/16 9/19 13/2 15/13 17/23 18/18</p> <p>Page 37 of 40</p> <p>pointed [2] 14/8 14/9</p> <p>pointers [1] 29/20</p> <p>points [1] 15/1</p> <p>position [8] 9/23 10/8 11/2 17/7 23/2 24/24 27/24 27/25</p> <p>possible [3] 25/8 25/10 27/22</p> <p>potential [2] 7/15 30/7</p> <p>potentially [3] 26/14 28/1 29/17</p> <p>powerful [1] 21/14</p> <p>preceded [1] 11/9</p> <p>predicate [1] 19/2</p> <p>prepared [6] 6/2 7/4 24/22 26/22 26/23 28/2</p> <p>preparing [3] 3/19 3/25 17/16</p> <p>present [5] 3/12 6/14 16/3 19/3 22/3</p> <p>preserve [2] 25/10 27/1</p> <p>preserved [2] 25/25 27/19</p> <p>press [2] 4/10 15/25</p> <p>presume [1] 9/20</p> <p>presumably [1] 13/7</p> <p>presumes [1] 13/20</p> <p>pretend [1] 9/1</p> <p>previously [3] 8/19 8/23 16/14</p> <p>prior [3] 9/2 14/23 20/7</p> <p>privilege [5] 12/13 28/18 28/22 28/24 29/11</p> <p>privileged [12] 10/15 10/21 11/13 18/9 22/23 23/7 24/9 24/12 28/12 28/20 29/3 29/17</p> <p>privileges [1] 22/24</p> <p>probably [2] 28/19 30/1</p> <p>proceed [2] 28/5 31/1</p> <p>proceeding [5] 8/22 12/25 18/2 20/23 23/24</p> <p>proceedings [4] 2/7 31/24 32/5 32/8</p> <p>process [13] 10/13 14/21 25/7 25/7 25/10 25/17 25/25 26/5 27/11 27/18 27/21 28/23 29/18</p> <p>processes [1] 23/19</p> <p>produce [7] 22/19 24/3 24/21 26/17 26/17 28/2 29/9</p> <p>produced [7] 2/7 11/20 12/10 12/10 23/14 30/24 30/25</p> <p>producible [3] 24/1 24/1 29/8</p> <p>production [1] 29/10</p> <p>prominently [1] 21/6</p> <p>proof [2] 9/16 9/18</p> <p>proposition [1] 22/4</p> <p>protect [1] 25/11</p> <p>protecting [1] 25/11</p> <p>prove [4] 8/6 9/20 13/23 15/21</p> <p>proven [3] 8/10 13/12 25/19</p> <p>provide [3] 14/18 27/2 27/5</p> <p>provided [10] 5/17 10/1 10/2 10/19 12/1 12/7 14/20 14/20 18/5 18/8</p> <p>providing [2] 15/24 28/20</p> <p>proving [1] 19/11</p> <p>public [1] 11/15</p> <p>pull [2] 18/3 18/3</p> <p>pulled [1] 17/10</p> <p>purpose [1] 6/20</p> <p>purposes [1] 8/20</p> <p>put [6] 7/24 10/6 13/25 19/22 21/12 30/7</p> <p>putting [3] 3/23 13/21 28/14</p>

Q	Response [1] 31/16 Result [1] 30/10 reveal [5] 11/25 20/12 23/22 23/24 30/6 revealed [1] 12/24 review [17] 12/8 12/18 12/21 16/20 16/20 17/9 23/1 23/3 24/18 25/5 28/16 28/16 29/6 29/8 29/16 30/17 30/20 reviewed [1] 17/1 reviewing [1] 23/5 right [10] 5/4 6/11 16/13 16/16 17/3 19/1 20/8 23/12 24/3 27/10 Ronald [2] 1/19 3/13 Room [1] 2/2 RPR [2] 2/1 32/14 Rule [6] 3/24 28/17 29/4 29/9 29/17 30/22 ruling [1] 12/19 run [1] 7/3	since [3] 12/17 15/16 16/14 situation [2] 19/23 30/12 situations [1] 21/22 slight [1] 15/19 small [1] 11/11 so [37] sole [1] 17/23 some [16] 3/17 5/23 8/16 10/16 12/14 12/25 16/20 19/3 19/5 20/13 22/16 25/9 27/19 28/23 29/20 31/13 someone [1] 13/25 something [3] 19/5 22/14 28/24 sort [1] 24/12 speak [2] 13/20 23/8 speaking [1] 27/12 specially [2] 4/16 6/24 specific [6] 7/4 7/5 7/6 21/21 24/10 28/14 speculate [1] 29/25 speedy [4] 31/6 31/10 31/18 31/21 stand [1] 22/9 statements [12] 9/24 10/5 10/6 10/7 10/8 10/20 10/24 11/2 20/14 24/22 24/25 25/1 STATES [8] 1/1 1/3 1/10 1/13 3/3 3/8 21/4 32/3 status [1] 21/9 statute [4] 18/23 19/1 30/4 30/4 step [1] 3/4 still [1] 28/10 strange [1] 16/23 Street [1] 1/14 strong [1] 28/18 stuff [2] 14/25 22/10 subject [3] 11/20 25/16 29/10 submissions [2] 5/14 25/13 submit [1] 26/22 submitted [2] 12/17 18/12 subscribed [1] 32/10 subsequent [1] 8/21 substance [1] 18/16 such [5] 4/24 14/18 23/23 24/10 28/18 suffer [1] 26/19 sufficient [2] 22/6 27/5 sufficiently [2] 25/23 25/23 suggest [1] 21/18 suggestion [3] 5/2 10/4 24/25 sum [1] 18/15 summation [1] 11/6 support [9] 4/17 6/14 8/9 9/25 15/24 16/1 16/19 17/25 22/6 supporting [2] 9/21 9/22 supports [1] 18/14 supposed [1] 24/23 sure [6] 6/7 7/24 22/13 22/23 22/24 31/11
<p>qualified [2] 22/24 28/24 qualify [1] 22/19 question [6] 12/12 17/14 19/22 20/11 24/8 28/11 questions [2] 5/12 16/10 quite [1] 24/5</p> <hr/> <p><b>R</b></p> <p>rather [2] 6/1 29/2 reality [2] 30/4 30/11 really [3] 9/9 18/24 22/10 reams [1] 5/13 reason [1] 29/19 reasonably [2] 31/9 31/12 receive [1] 23/13 recited [1] 16/4 record [5] 3/4 3/5 6/2 21/7 31/12 recorded [1] 2/7 redact [1] 27/16 redacted [8] 18/13 18/14 18/14 18/14 25/9 26/1 26/9 27/25 redaction [3] 26/8 27/1 28/3 reference [7] 3/14 7/10 7/23 15/15 16/11 19/17 20/14 reflected [1] 20/24 reframing [1] 4/22 regard [10] 6/16 7/7 13/6 14/7 19/2 23/3 24/8 24/9 24/12 25/24 regarding [3] 4/5 8/12 31/6 Regardless [1] 4/7 REGGIE [1] 1/9 Register [2] 6/25 7/1 regular [1] 25/16 regulations [10] 9/15 19/16 19/19 19/21 19/25 21/16 21/17 21/19 22/2 22/15 related [8] 3/15 6/11 7/15 7/19 8/11 10/17 27/7 27/8 relating [1] 10/16 relatively [1] 9/19 release [1] 15/25 relevant [7] 13/11 14/9 14/10 15/14 15/17 18/19 24/20 relies [1] 16/12 relying [3] 5/3 24/23 25/1 remaining [1] 28/9 remarking [1] 5/15 remove [1] 3/21 reported [1] 32/4 Reporter [4] 2/1 2/1 32/2 32/14 reports [1] 21/9 representation [1] 30/20 representations [4] 12/4 20/19 25/15 25/24 represented [1] 30/17 representing [1] 11/9 request [3] 12/14 19/18 20/12 requesting [1] 26/7 requests [1] 28/14 require [1] 13/18 required [5] 9/7 13/23 20/6 25/13 27/15 requires [1] 30/13 resolve [1] 17/14 respect [1] 25/4 respond [2] 6/6 20/2</p>	<p><b>S</b></p> <p>said [14] 5/1 8/21 11/12 14/2 14/14 14/19 22/21 23/1 23/2 24/21 26/4 28/13 29/6 32/8 sanctions [1] 16/24 say [20] 5/16 6/18 10/3 10/25 11/19 12/5 14/13 15/16 15/23 17/17 18/13 19/15 19/15 19/19 20/4 20/13 22/9 23/16 24/18 29/5 saying [14] 4/25 8/4 10/20 10/24 12/1 15/6 19/8 19/9 22/2 22/17 24/16 28/8 29/2 29/12 says [8] 4/19 14/7 14/9 15/25 18/9 20/25 22/11 31/5 Scooter [1] 26/5 SDGT [2] 3/22 15/4 secretly [1] 21/3 section [4] 1/13 27/13 27/14 31/19 security [3] 1/13 26/15 26/16 seek [1] 10/5 seeking [4] 3/18 3/21 26/8 30/8 seem [1] 24/18 seems [9] 5/21 8/10 8/17 19/20 22/1 22/18 26/16 28/6 28/10 selected [1] 6/1 selects [1] 4/18 self [2] 5/21 6/1 self-evident [1] 5/21 self-selected [1] 6/1 SENIOR [1] 1/9 sense [1] 20/5 sentence [1] 4/18 set [3] 14/11 18/25 21/2 seven [5] 4/14 4/19 5/7 17/23 25/18 seven-year [4] 4/14 4/19 5/7 17/23 several [1] 10/18 sharp [1] 28/10 shorthand [3] 2/7 32/5 32/9 should [13] 4/15 7/22 10/10 11/4 12/10 15/9 16/13 17/25 18/13 18/15 28/25 30/8 30/19 shouldn't [1] 8/6 show [7] 6/22 9/17 14/10 19/4 21/7 21/10 21/21 shows [1] 18/17 significant [1] 28/7 simply [1] 25/8</p>	<hr/> <p><b>T</b></p> <p>TAJIDEEN [19] 1/5 3/3 3/12 3/21 4/11 4/22 5/9 5/19 16/23 17/24 18/11 18/13 18/20 19/8 21/1 21/8 21/17 21/23 22/8 Tajideen's [5] 3/25 5/5 18/20 20/22 25/20 take [2] 27/14 27/15 taking [1] 19/10 talking [2] 12/23 30/12 talks [1] 13/3</p>

<p><b>T</b></p> <p><b>target</b> [2] 16/24 17/17</p> <p><b>tell</b> [2] 19/20 29/3</p> <p><b>tells</b> [1] 15/2</p> <p><b>tend</b> [2] 5/2 10/3</p> <p><b>terrorist</b> [7] 3/16 4/16 4/23 6/25 7/15 7/19 18/1</p> <p><b>testimony</b> [2] 16/4 32/5</p> <p><b>than</b> [3] 6/1 20/20 29/2</p> <p><b>Thank</b> [5] 16/9 20/18 31/2 31/22 31/23</p> <p><b>that</b> [287]</p> <p><b>that's</b> [26] 5/4 6/13 8/3 8/18 9/17 10/23 11/18 11/20 12/8 12/20 13/16 17/12 18/15 19/2 19/18 21/6 22/14 23/5 24/6 24/20 26/3 28/14 28/24 29/24 30/1 30/11</p> <p><b>their</b> [18] 5/12 5/15 5/15 5/16 7/18 10/15 13/3 13/3 13/7 14/13 15/1 15/2 18/4 21/11 27/12 29/25 30/7 30/9</p> <p><b>them</b> [12] 5/15 10/14 11/9 14/2 14/12 20/12 21/17 24/24 28/16 28/17 29/2 29/5</p> <p><b>themselves</b> [1] 21/15</p> <p><b>then</b> [21] 8/5 15/17 21/2 22/18 23/12 23/25 24/1 24/13 25/6 26/9 26/16 26/19 26/24 27/7 28/5 28/17 28/17 29/12 29/14 29/18 30/25</p> <p><b>theory</b> [8] 5/8 8/9 9/25 21/1 21/4 22/6 22/15 30/2</p> <p><b>there</b> [19] 4/4 6/21 7/15 8/4 8/4 8/13 13/8 14/17 16/5 16/19 19/18 21/24 23/20 23/23 24/19 29/8 29/14 30/22 31/1</p> <p><b>there's</b> [8] 8/3 10/2 15/19 21/6 22/10 22/14 24/4 31/5</p> <p><b>thereafter</b> [2] 7/2 15/3</p> <p><b>therefore</b> [3] 10/7 14/15 28/2</p> <p><b>Thereupon</b> [1] 31/24</p> <p><b>these</b> [11] 9/14 10/6 11/8 15/13 17/6 17/8 18/3 21/2 21/5 22/15 22/23</p> <p><b>they</b> [70]</p> <p><b>they'd</b> [3] 13/22 19/3 19/20</p> <p><b>they'll</b> [1] 24/21</p> <p><b>they're</b> [5] 10/24 10/25 22/24 24/23 25/1</p> <p><b>they've</b> [2] 24/21 28/6</p> <p><b>thin</b> [1] 17/10</p> <p><b>thing</b> [3] 13/2 14/6 24/7</p> <p><b>things</b> [8] 4/25 10/24 13/5 13/9 13/14 13/15 14/11 26/22</p> <p><b>think</b> [20] 6/11 6/13 7/20 12/12 12/12 12/21 12/22 13/19 17/12 18/19 19/16 25/3 26/6 28/9 28/12 28/14 29/24 29/24 30/1 30/2</p> <p><b>thinking</b> [1] 15/12</p> <p><b>thinks</b> [1] 14/2</p> <p><b>this</b> [48]</p> <p><b>Thomas</b> [1] 1/12</p> <p><b>those</b> [32] 4/5 4/8 5/14 8/2 10/6 10/8 13/10 15/10 15/10 17/14 17/19 18/6 18/10 19/4 19/6 19/13 19/18 19/21 20/3 20/12 20/18 20/20 20/21 21/14 21/15 22/3 24/24 25/9 25/24 28/15 28/25 29/15</p> <p><b>though</b> [3] 4/3 7/16 8/7</p> <p><b>thought</b> [2] 22/25 29/6</p> <p><b>thousand</b> [1] 14/11</p>	<p><b>three</b> [1] 13/14</p> <p><b>through</b> [4] 7/21 7/12 20/19 29/3</p> <p><b>tied</b> [2] 4/9 17/15</p> <p><b>time</b> [1] 5/2</p> <p><b>today</b> [1] 13/3</p> <p><b>together</b> [1] 7/24</p> <p><b>told</b> [3] 12/6 12/6 19/13</p> <p><b>toll</b> [1] 31/9</p> <p><b>tolled</b> [1] 31/21</p> <p><b>tolling</b> [1] 31/17</p> <p><b>Tom</b> [1] 3/6</p> <p><b>took</b> [4] 9/2 23/2 27/23 27/24</p> <p><b>touches</b> [1] 3/19</p> <p><b>transactions</b> [8] 5/11 7/5 7/6 9/14 9/15 17/19 17/19 21/15</p> <p><b>transcribed</b> [1] 32/9</p> <p><b>transcript</b> [3] 1/8 2/7 32/8</p> <p><b>transcription</b> [1] 2/7</p> <p><b>transparency</b> [1] 5/16</p> <p><b>Treasury</b> [1] 6/20</p> <p><b>trial</b> [10] 1/15 9/12 13/12 13/13 18/21 26/21 31/6 31/10 31/18 31/21</p> <p><b>true</b> [1] 14/12</p> <p><b>try</b> [5] 9/20 13/21 14/10 14/13 18/12</p> <p><b>trying</b> [6] 4/14 9/5 9/6 11/25 15/13 21/4</p> <p><b>turn</b> [1] 28/19</p> <p><b>turned</b> [2] 11/10 11/14</p> <p><b>two</b> [2] 13/14 18/12</p> <p><b>type</b> [1] 12/25</p> <hr/> <p><b>U</b></p> <p><b>U.S</b> [8] 1/16 2/2 5/11 8/18 9/8 20/7 21/2 21/14</p> <p><b>ultimately</b> [1] 23/3</p> <p><b>unable</b> [1] 17/7</p> <p><b>unclassified</b> [6] 10/15 11/13 18/9 24/19 29/7 30/21</p> <p><b>unclear</b> [2] 20/17 22/11</p> <p><b>under</b> [14] 3/24 9/18 23/13 24/2 24/6 25/12 27/12 27/14 28/5 29/9 29/9 30/5 30/16 31/9</p> <p><b>underlying</b> [1] 16/16</p> <p><b>undermine</b> [6] 5/2 8/13 10/4 10/7 11/2 24/25</p> <p><b>underpinnings</b> [1] 9/10</p> <p><b>understand</b> [20] 4/2 6/4 7/11 9/5 10/13 10/14 10/23 11/14 11/15 11/24 19/7 19/9 21/19 22/3 22/5 22/9 22/16 22/18 26/4 29/5</p> <p><b>understanding</b> [1] 5/4</p> <p><b>understands</b> [1] 15/11</p> <p><b>understood</b> [1] 20/23</p> <p><b>unfortunate</b> [2] 30/3 30/11</p> <p><b>UNITED</b> [8] 1/1 1/3 1/10 1/13 3/3 3/8 21/3 32/3</p> <p><b>universe</b> [1] 11/11</p> <p><b>unlawful</b> [1] 17/10</p> <p><b>unless</b> [1] 29/3</p> <p><b>unprecedented</b> [1] 5/7</p> <p><b>unqualified</b> [1] 28/24</p> <p><b>unspecified</b> [1] 22/23</p> <p><b>until</b> [2] 31/10 31/21</p> <p><b>up</b> [8] 5/6 5/12 5/25 18/20 21/2 22/9 25/20 28/4</p> <p><b>upon</b> [10] 5/3 16/12 20/12 24/23 25/1 29/7 30/4 30/16 30/19 31/20</p>	<p><b>us</b> [8] 5/17 5/21 11/12 12/6 18/17 24/1 Page 39 of 40</p> <p><b>use</b> [5] 10/5 15/6 15/6 15/8 26/8</p> <p><b>used</b> [2] 16/18 21/2</p> <p><b>uses</b> [1] 7/1</p> <p><b>using</b> [2] 9/24 11/3</p> <hr/> <p><b>V</b></p> <p><b>vast</b> [1] 18/11</p> <p><b>versus</b> [2] 3/3 8/18</p> <p><b>very</b> [7] 11/22 13/1 16/4 19/15 21/19 21/22 31/20</p> <p><b>vet</b> [1] 5/10</p> <p><b>view</b> [2] 28/16 29/21</p> <p><b>violate</b> [3] 13/15 21/17 21/24</p> <p><b>violated</b> [5] 16/25 19/14 19/19 20/4 20/21</p> <p><b>violation</b> [1] 9/15</p> <p><b>violative</b> [2] 17/19 21/16</p> <p><b>virtually</b> [1] 3/19</p> <hr/> <p><b>W</b></p> <p><b>WALTON</b> [1] 1/9</p> <p><b>want</b> [2] 10/24 13/19</p> <p><b>wanted</b> [3] 27/3 27/5 31/11</p> <p><b>wants</b> [2] 21/18 28/13</p> <p><b>was</b> [59]</p> <p><b>Washington</b> [5] 1/5 1/14 1/17 1/21 2/3</p> <p><b>way</b> [4] 19/5 19/23 20/13 27/6</p> <p><b>we</b> [53]</p> <p><b>we'd</b> [1] 29/13</p> <p><b>we'll</b> [1] 31/1</p> <p><b>we're</b> [15] 3/18 3/20 3/22 3/24 12/23 13/23 16/2 18/9 22/21 22/23 22/24 24/11 25/14 29/2 29/22</p> <p><b>we've</b> [1] 25/18</p> <p><b>well</b> [8] 13/1 14/23 15/19 17/4 20/5 24/13 31/11 31/20</p> <p><b>were</b> [28] 4/20 5/24 7/4 7/4 10/6 11/3 11/12 12/11 14/12 14/25 15/4 16/5 16/24 17/19 18/6 18/19 19/4 19/14 19/18 19/19 19/21 20/13 20/21 21/15 22/17 25/1 26/23 29/20</p> <p><b>weren't</b> [2] 23/1 26/22</p> <p><b>what</b> [80]</p> <p><b>what's</b> [4] 6/8 14/5 28/11 30/17</p> <p><b>whatever</b> [3] 7/23 15/11 26/15</p> <p><b>when</b> [2] 9/2 17/5</p> <p><b>where</b> [6] 5/21 9/21 15/6 28/21 29/4 30/12</p> <p><b>whereof</b> [1] 32/10</p> <p><b>whether</b> [26] 4/7 6/21 7/2 7/3 7/18 9/11 9/13 12/9 12/22 15/8 17/19 21/23 21/24 22/11 23/25 24/3 24/19 24/23 26/10 26/24 27/1 27/4 27/4 28/18 29/1 31/13</p> <p><b>which</b> [18] 4/14 4/21 7/14 8/18 11/11 12/19 12/20 16/23 18/2 19/10 20/24 21/2 23/14 24/3 24/4 27/13 28/10 30/6</p> <p><b>while</b> [2] 7/11 25/10</p> <p><b>who</b> [2] 3/12 8/18</p> <p><b>whole</b> [2] 20/23 21/4</p> <p><b>why</b> [10] 8/5 8/9 8/14 9/17 15/17 16/12 20/19 20/21 22/5 30/4</p> <p><b>will</b> [15] 3/23 6/10 12/19 12/20 14/18 21/22 23/18 24/18 27/16 30/16 30/18 30/20 30/23 30/25 31/21</p>
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**W**

**WILMER** [1] 1/20  
**within** [1] 23/21  
**witness** [4] 6/18 7/2 7/3 32/10  
**wording** [1] 7/23  
**words** [2] 6/25 10/15  
**working** [1] 9/7  
**would** [59]  
**wouldn't** [2] 22/5 28/19  
**wrong** [4] 18/22 19/1 22/25 23/3

**Y**

**year** [4] 4/14 4/19 5/7 17/23  
**years** [1] 25/18  
**yes** [6] 3/17 14/19 20/5 20/17 27/10  
31/7  
**yet** [1] 12/19  
**York** [1] 1/16  
**you** [66]  
**you're** [13] 9/24 10/5 10/20 11/2 22/2  
22/7 24/16 24/17 26/7 27/10 28/8 28/8  
30/12  
**you've** [2] 12/10 14/17  
**your** [36]  
**yourselves** [1] 3/5