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Transcript of **Huma Abedin**

Date: June 28, 2016

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

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IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF COLUMBIA

- - - - - x
JUDICIAL WATCH, INC., :
Plaintiff, :
v. : Civil Action No.
U.S. DEPARTMENT OF STATE, : 13-cv-1363(EGS)
Defendant. :
- - - - - X

Videotaped Deposition of HUMA ABEDIN
Washington, DC
Tuesday, June 28, 2016
9:29 a.m.

Job No.: 113000
Pages 1 - 224
Reported by: Debra A. Whitehead

Videotaped Deposition of Huma Abedin
Conducted on June 28, 2016

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1 Videotaped Deposition of HUMA ABEDIN, held at the
2 offices of:

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BRYAN CAVE, LLP

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1155 F Street, NW

6

Suite 700

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Washington, DC 20004-1357

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(202) 508-6000

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Pursuant to notice, before Debra A. Whitehead, an

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Approved Reporter of the United States District Court

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and Notary Public of the District of Columbia.

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Videotaped Deposition of Huma Abedin
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A P P E A R A N C E S C O N T I N U E D

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GREGORY LAUDADIO, Judicial Watch

CHEYENNE TRIMELS, Judicial Watch

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(Attached to the Transcript)

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E X H I B I T S C O N T I N U E D

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1	PROCEEDINGS	09:28:19
2	VIDEO SPECIALIST: Here begins Tape Number	09:28:19
3	1 in the videotaped deposition of Huma Abedin in the	09:28:33
4	matter of Judicial Watch, Inc., v. the U.S.	09:28:36
5	Department of State, in the U.S. District Court for	09:28:40
6	the District of Columbia, Case Number 13-CV-1363.	09:28:44
7	Today's date is June 28, 2016. The time	09:28:51
8	on the video monitor is 9:29 a.m. The videographer	09:28:55
9	today is Jeremy Dineen, representing Planet Depos.	09:29:00
10	This video deposition is taking place at Bryan Cave,	09:29:04
11	1155 F Street, Northwest, in Washington, DC.	09:29:08
12	Would counsel please voice-identify	09:29:12
13	themselves and state whom they represent.	09:29:14
14	MS. COTCA: Ramona Cotca, for Judicial	09:29:17
15	Watch.	09:29:20
16	MR. ORFANEDES: Paul Orfanedes, for	09:29:20
17	Judicial Watch.	09:29:22
18	MR. BEKESHA: Michael Bekesha, for	09:29:22
19	Judicial Watch.	09:29:25
20	MR. PETERSON: James Peterson, for	09:29:25
21	Judicial Watch.	09:29:25
22	MR. FITTON: Tom Fitton, Judicial Watch	09:29:25

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1	President.	09:29:28
2	MR. LAUDADIO: Gregory Laudadio, Judicial	09:29:28
3	Watch.	09:29:30
4	MS. TRIMELS: Cheyenne Trimels, Judicial	09:29:30
5	Watch.	09:29:34
6	MR. GRIFFITHS: John Griffiths, State	09:29:34
7	Department.	09:29:36
8	MR. MYERS: Steven Myers, State	09:29:36
9	Department.	09:29:36
10	MS. WELCHER: Alison Welcher, State	09:29:36
11	Department.	09:29:38
12	MS. BERMAN: Marcia Berman, State	09:29:41
13	Department.	09:29:42
14	MS. WOLVERTON: Caroline Wolverton, State	
15	Department.	
16	MR. RODRIGUEZ: Miguel Rodriguez, for Huma	
17	Abedin.	
18	MS. GOODMAN: Martha Goodman, for	
19	Ms. Abedin.	09:29:46
20	MR. BRILLE: Mike Brille; Boies,	09:29:47
21	Schiller & Flexner, for Ms. Abedin.	09:29:52
22	VIDEO SPECIALIST: The court reporter	09:29:52

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1	today is Debbie Whitehead, representing Planet	09:29:52
2	Depos.	09:29:54
3	Would the reporter please swear in the	09:29:54
4	witness.	09:29:54
5	HUMA ABEDIN,	09:29:54
6	having been duly sworn, testified as follows:	09:30:03
7	EXAMINATION BY COUNSEL FOR PLAINTIFF	09:30:03
8	BY MS. COTCA:	09:30:03
9	Q Good morning, Ms. Abedin. My name is	09:30:09
10	Ramona Cotca, and I represent Judicial Watch in this	09:30:12
11	lawsuit.	09:30:15
12	Could you --	09:30:17
13	A Good morning.	09:30:18
14	Q Good morning.	09:30:19
15	Could you for the record please state your	09:30:20
16	full name?	09:30:22
17	A Huma Abedin.	09:30:23
18	Q Okay. Can you hear me okay?	09:30:24
19	A Yes, I can hear you. There's a little bit	09:30:26
20	of an echo, but I can hear you okay.	09:30:28
21	Q Okay. Have you ever had your deposition	09:30:30
22	taken before?	09:30:32

Videotaped Deposition of Huma Abedin
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1	A	No. This is my first time.	09:30:34
2	Q	Okay. So I would like to go over some	09:30:35
3		ground rules for the deposition. As you know,	09:30:37
4		you've been sworn in under oath. We have the court	09:30:39
5		reporter here who is transcribing everything that we	09:30:41
6		are saying here today. For that reason, I would ask	09:30:44
7		that we try not to speak over each other. So I will	09:30:46
8		do my best to let you finish answering the	09:30:49
9		questions, and then even though you may anticipate	09:30:52
10		the question that I'm about to ask, I would just ask	09:30:54
11		that you let me finish asking the question so we	09:30:57
12		don't speak over each other. Is that fair?	09:30:59
13	A	Yes.	09:31:02
14	Q	Okay. The next instruction or ground rule	09:31:02
15		would be that all your responses should be verbal,	09:31:05
16		not shakes of the heads or nods, so the court	09:31:08
17		reporter can take it on the transcript.	09:31:11
18		Is that fair?	09:31:13
19	A	Yes.	09:31:14
20	Q	Okay. If you don't understand a question	09:31:14
21		that I am asking or you would like some	09:31:21
22		clarification, please let me know. If you do not, I	09:31:23

Videotaped Deposition of Huma Abedin
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1	will assume that you have understood the question	09:31:27
2	that is being asked. Okay?	09:31:28
3	A Makes sense.	09:31:30
4	Q Okay. We will try to go through this as	09:31:31
5	quickly as possible. If you need a break at any	09:31:35
6	point just let me know, and I'm sure we'll come to a	09:31:38
7	good stopping point for you to take a -- for us to	09:31:42
8	take a break. Fair?	09:31:44
9	A Okay.	09:31:46
10	Q Okay. Is there any reason why you believe	09:31:46
11	that you would not be able to answer all the	09:31:52
12	questions truthfully here today?	09:31:54
13	A There is no reason.	09:31:57
14	Q Okay. What is your current employment?	09:31:57
15	A I work at the Hillary for America	09:32:01
16	presidential campaign.	09:32:04
17	Q Okay. And what is your position?	09:32:05
18	A I am the vice-chair of the campaign.	09:32:07
19	Q Okay.	09:32:08
20	(Abedin Deposition Exhibit 1 marked for	09:32:08
21	identification and is attached to the transcript.)	09:32:12
22	Q Just very briefly, I would like to show	09:32:12

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1	you what's been marked as Exhibit 1.	09:32:13
2	MS. COTCA: I think I have enough copies.	09:32:16
3	Maybe not. I don't know. There are a lot of people	09:32:18
4	in the room.	09:32:20
5	Q And that's a copy of your subpoena for	09:32:25
6	your deposition here today. Is that right?	09:32:27
7	MR. BRILLE: Is the question does she	09:32:48
8	recognize it? We'll stipulate that this is a copy	09:32:50
9	of the subpoena.	09:32:52
10	MS. COTCA: Okay.	09:32:53
11	Q Have you seen the subpoena prior to today?	09:32:53
12	A No, I have not.	09:32:55
13	Q Okay. Prior to coming here today, have	09:32:56
14	you reviewed any other documents in preparation for	09:32:59
15	your deposition today?	09:33:02
16	A Yes.	09:33:03
17	Q Okay. And what are those documents that	09:33:03
18	you've reviewed?	09:33:05
19	MR. BRILLE: I'm going to object and	09:33:06
20	instruct the witness not to answer.	09:33:07
21	MS. COTCA: On what basis?	09:33:09
22	MR. BRILLE: On the basis that it is work	09:33:10

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1 product and protected by the attorney-client 09:33:11
2 privilege. 09:33:13
3 Q Have you reviewed any of the documents 09:33:15
4 that have been produced by the State Department in 09:33:20
5 preparation for your deposition here today? 09:33:23
6 MS. WOLVERTON: Objection. Lack of 09:33:29
7 foundation. 09:33:30
8 MR. BRILLE: You can answer -- 09:33:33
9 Q You can answer. 09:33:34
10 MR. BRILLE: -- to the extent you 09:33:34
11 understand. 09:33:35
12 A Yes, I have. 09:33:36
13 Q Okay. And what are the documents that 09:33:36
14 you've reviewed that have been previously produced 09:33:39
15 by the State Department? 09:33:41
16 MR. BRILLE: Same objection. 09:33:42
17 Instruct the witness not to answer. 09:33:44
18 You can ask her if she's reviewed 09:33:46
19 documents outside of -- outside of meetings with her 09:33:48
20 counsel, you can do that. But I'm not going to let 09:33:50
21 you ask her about the documents she's reviewed with 09:33:52
22 her counsel. 09:33:54

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1	Q	Okay. Are all of the documents that	09:33:55
2		you've reviewed in the presence of your counsel?	09:33:58
3	A	Yes.	09:34:00
4	Q	Okay. Other than meeting with your	09:34:00
5		attorneys, did you speak with anybody about your	09:34:11
6		deposition today?	09:34:13
7	A	No, I have not.	09:34:15
8	Q	Okay. Did you discuss your testimony here	09:34:16
9		today with Secretary Clinton?	09:34:19
10	A	No, I did not.	09:34:21
11	Q	Okay. I'd like to go over just general	09:34:22
12		background of your employment at the State	09:34:27
13		Department.	09:34:29
14		When did you begin working for the State	09:34:29
15		Department?	09:34:31
16	A	It was in January of 2009.	09:34:32
17	Q	Okay. And what was your position at the	09:34:35
18		time?	09:34:38
19	A	I was Deputy Chief of Staff in the Office	09:34:39
20		of the Secretary. Deputy Chief of Staff for	09:34:41
21		operations in the Office of the Secretary.	09:34:46
22	Q	And how long did you stay at the State	09:34:48

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1	Department?	09:34:50
2	A I stayed throughout her tenure, until	09:34:50
3	2013.	09:34:53
4	Q Okay. That would be February of 2013?	09:34:53
5	Is that correct?	09:34:56
6	A That is correct.	09:34:57
7	Q And did your position change at all while	09:34:57
8	you were at the State Department?	09:35:00
9	A Yes, it did.	09:35:01
10	Q Okay. When did it change, and how did	09:35:01
11	it -- what did it change to?	09:35:03
12	A It changed, if my memory serves me	09:35:05
13	correctly, in the last six months it was about June	09:35:09
14	of 2012, and I transitioned to being a senior	09:35:13
15	advisor to the Office of the Secretary.	09:35:15
16	Q Okay. And why did the change take place?	09:35:19
17	MR. BRILLE: Objection.	09:35:22
18	Instruct the witness not to answer.	09:35:23
19	MS. COTCA: On what basis?	09:35:25
20	MR. BRILLE: It's outside the scope of the	09:35:25
21	deposition. Not only is it outside the scope, it's	09:35:27
22	specifically prohibited by the judge's order.	09:35:29

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1 Inquiry into her status, the change of her status at 09:35:32
2 the time. 09:35:38

3 MS. WOLVERTON: I'll voice the same 09:35:38
4 objection. 09:35:41

5 Q Okay. As the Deputy Chief of Staff, what 09:35:41
6 were your duties and responsibilities at the State 09:35:44
7 Department? 09:35:48

8 A My responsibilities were the long-term and 09:35:49
9 short-term planning, coordinating with other senior 09:35:54
10 members of the department and other agencies, and 09:35:58
11 then working with the Secretary's scheduler, and her 09:36:02
12 team who traveled with her, to implement her 09:36:04
13 domestic and foreign travel. 09:36:07

14 Q Okay. When you said long-term planning 09:36:08
15 and short-term planning, what planning are you 09:36:11
16 talking about? 09:36:13

17 A Her overseas trips and domestic trips and 09:36:13
18 events that she would do in Washington at the 09:36:17
19 department and throughout the city. 09:36:19

20 Q Okay. And did you continue having those 09:36:20
21 roles, those duties and responsibilities, when your 09:36:26
22 position changed in 2012? 09:36:29

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1 MR. BRILLE: You can answer that, yes. 09:36:35

2 A Yes, they did. 09:36:37

3 Q Okay. And one other thing I should have 09:36:38

4 said. There may be objections that may be raised 09:36:40

5 during the deposition, and that's fine. But unless 09:36:42

6 your attorney instructs you not to answer, you still 09:36:46

7 must answer the question. Fair? 09:36:49

8 A Of course. 09:36:50

9 Q Okay. 09:36:51

10 A That's -- it's my first time so ... 09:36:52

11 Q That's okay. 09:36:53

12 A I understand, though. 09:36:55

13 Q Sure. Thank you. 09:36:56

14 Okay. And did you continue working for 09:37:01

15 the Secretary when you left the State Department? 09:37:04

16 A Yes. 09:37:07

17 Q Okay. I'd like to change the conversation 09:37:07

18 or the questions to the Clinton server for the 09:37:15

19 Clinton e-mail accounts. 09:37:21

20 When I say "the Clinton server," do you 09:37:24

21 understand that to mean the server that provided -- 09:37:27

22 or that was connected to the e-mail accounts, or the 09:37:30

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1	e-mail account for Secretary Clinton with a domain	09:37:34
2	@Clintonemail.com?	09:37:37
3	MR. BRILLE: Objection.	09:37:38
4	MS. WOLVERTON: Objection. Vague.	09:37:39
5	MR. BRILLE: Same objection. Form.	09:37:40
6	Q Okay.	09:37:42
7	A Yes, I now understand -- I do understand	09:37:44
8	what you are -- what you're referring to, yes.	09:37:47
9	Q Okay. And just for clarity of the record,	09:37:48
10	I'll refer to it as the Clinton server. Can we	09:37:52
11	agree, during the deposition?	09:37:55
12	MR. BRILLE: Same objection.	09:37:57
13	MS. WOLVERTON: Same objection.	09:37:58
14	Q Can we agree?	09:38:00
15	A Understood.	09:38:01
16	Q Thank you. Okay.	09:38:01
17	When was the server set up?	09:38:07
18	A I don't know exactly.	09:38:10
19	Q Do you have -- and I'm not looking for a	09:38:11
20	specific date, but a time frame of when the server	09:38:14
21	was set up?	09:38:17
22	A I wasn't involved in the -- in the setting	09:38:19

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1 up of the server, so any answer I give -- I would 09:38:23
2 give you would be my speculating. 09:38:26

3 Q Okay. When did you first become aware of 09:38:29
4 the Clinton server? 09:38:35

5 A I don't -- I don't know that I experienced 09:38:39
6 the -- the notion of the server for -- for my 09:38:43
7 purposes. It was a matter of obtaining an e-mail 09:38:49
8 address. I -- I don't ... 09:38:53

9 Q Okay. 09:38:59

10 A I didn't really think about the server 09:39:00
11 until the -- all the press reports in the last year 09:39:01
12 and a half -- 09:39:04

13 Q Okay. 09:39:05

14 A -- came out. 09:39:06

15 Q Okay. And you just testified that it was 09:39:07
16 a matter of obtaining an e-mail address. Can you 09:39:09
17 tell me more about that? Can you explain that, what 09:39:11
18 you mean by that? 09:39:15

19 A Yes. Yes, of course. 09:39:16

20 In the -- towards the end of 2008, after 09:39:17
21 the presidential campaign had ended, Secretary 09:39:19
22 Clinton's first presidential campaign had ended and 09:39:23

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1 she was leaving the Senate, I was losing both my 09:39:25
2 Senate e-mail, as well as my Clinton campaign 09:39:30
3 e-mail. 09:39:34

4 And so I reached out to the person I had 09:39:36
5 generally been in touch with in President Clinton's 09:39:41
6 office on IT matters and asked him what I should do, 09:39:44
7 since I was losing an e-mail account. I always had 09:39:46
8 an e-mail account associated with the Clinton family 09:39:49
9 to deal with their -- to deal with their personal 09:39:52
10 matters. 09:39:55

11 Q Okay. And was this before starting at the 09:39:55
12 State Department? 09:39:58

13 A Yeah, I -- I -- it would have been prior 09:40:00
14 to starting at the State Department when we had the 09:40:03
15 conversations, because we were -- I was losing -- in 09:40:05
16 the process of transitioning. So, yes. 09:40:07

17 Q Okay. And who did you speak with for -- 09:40:09
18 who is the IT person that you spoke to? 09:40:13

19 A My memory is that it was Justin Cooper, 09:40:16
20 who worked in President Clinton's office. 09:40:19

21 Q What was his position in President 09:40:22
22 Clinton's office? 09:40:24

Videotaped Deposition of Huma Abedin
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1 A He was one of his senior staff members who 09:40:25
2 traveled with him and did -- had many 09:40:30
3 responsibilities, and one of them was helping with 09:40:37
4 the IT support. 09:40:40

5 Q Okay. And with respect to obtaining an 09:40:42
6 e-mail address, what happened after you informed 09:40:44
7 Justin Cooper about the need for you to have another 09:40:48
8 e-mail account set up? 09:40:51

9 A From my memory, he had mentioned that 09:40:53
10 they -- there was an @Clintonemail.com address that 09:40:59
11 he could provide for me, that he was doing a similar 09:41:02
12 arrangement for the Secretary, and that we could -- 09:41:07
13 that I could also have that e-mail address. And he 09:41:12
14 sent it to me. 09:41:14

15 Q Okay. And what was that e-mail address? 09:41:15

16 A It was Huma@Clintonemail.com. 09:41:17

17 Q Okay. And what was the Secretary's e-mail 09:41:19
18 address on that account, on that server? 09:41:22

19 A It was HDR22@Clintonemail.com. 09:41:25

20 Q Okay. Is Justin Cooper the only 09:41:34
21 individual you spoke in that time frame about 09:41:42
22 getting an e-mail account set up? 09:41:45

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1 A Justin is who I remember talking to. Over 09:41:48
2 the years there was -- there were two people I 09:41:50
3 talked to about IT issues. It was either Justin or 09:41:53
4 Bryan Pagliano. 09:41:56

5 Q Okay. And we'll get to Mr. Pagliano. But 09:41:58
6 just for clarification, with respect to your 09:42:00
7 communications with Bryan Pagliano, were those -- 09:42:05
8 once the e-mail account was set up and dealing with 09:42:10
9 technical issues? 09:42:14

10 MR. BRILLE: I'm sorry, I didn't catch the 09:42:18
11 question. Can you -- can you restate it? Can you 09:42:19
12 read it back, if -- 09:42:23

13 Q With respect to Mr. -- your conversations 09:42:26
14 with Mr. Pagliano, was that in connection with 09:42:27
15 setting up the e-mail account? 09:42:32

16 A My memory is I talked to Justin. Justin, 09:42:34
17 for the many years before, was our primary point of 09:42:38
18 contact. And -- and, frankly, every time anything 09:42:40
19 was broken, you called Justin, it got fixed very 09:42:45
20 quickly. So it was a -- Justin was usually my 09:42:48
21 primary point of contact. 09:42:52

22 Were there times when I called him and 09:42:53

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1 said, You should consult with Bryan, yes. I don't 09:42:55
2 remember the time frame. And I don't believe Bryan 09:42:58
3 was -- well, I know Bryan wasn't really involved 09:43:00
4 in -- in anything related to IT for the Clintons 09:43:05
5 until the -- until the campaign, the 2008 09:43:09
6 presidential campaign. 09:43:12

7 Q Okay. And when he -- when Mr. Cooper told 09:43:12
8 you -- advised you to go and consult with 09:43:19
9 Mr. Pagliano, do you recall the issues? 09:43:21

10 A It was usually if our e-mail wasn't 09:43:23
11 working, you know, there was a delay, can't figure 09:43:25
12 out what's going on. I would call Justin. Usually 09:43:29
13 Justin would just fix it over the phone. And then, 09:43:32
14 but were there periods where he said, Call Bryan? 09:43:36
15 Absolutely. 09:43:38

16 Q Do you know why the Clintonemail.com 09:43:41
17 system was set up? 09:43:43

18 A I -- the system -- the system? I'm sorry, 09:43:48
19 can you explain, ask the question? 09:43:53

20 Q Sure. Why was the e-mails with the 09:43:56
21 Clinton @Clintonemail.com created? 09:44:01

22 MR. BRILLE: Objection. Form. 09:44:05

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1 A Well, as I -- as I mentioned earlier, 09:44:06
2 we -- I was losing both my e-mail addresses at the 09:44:09
3 end of the presidential campaign and the Senate. So 09:44:12
4 both my, you know, Clinton e-mail addresses were 09:44:15
5 going. I needed a new e-mail. 09:44:21
6 I remember just reaching out and saying, 09:44:23
7 what should I do. I'm no longer going to have 09:44:25
8 HillaryClinton.com, and he suggested 09:44:28
9 @Clintonemail.com being an option. 09:44:32
10 Q Okay. At that time did Secretary Clinton 09:44:36
11 already have an e-mail account associated with the 09:44:41
12 @Clintonemail.com? 09:44:44
13 MS. WOLVERTON: Objection. Lack of 09:44:47
14 foundation. 09:44:47
15 MR. BRILLE: That's ... 09:44:49
16 A She had an e-mail account, yes. It was 09:44:50
17 not @Clinton e-mail. It was another e-mail that it 09:44:52
18 was associated with the BlackBerry she was using 09:44:55
19 during the presidential campaign. 09:45:00
20 Q And what was that e-mail address? 09:45:01
21 A It was -- I think it was 09:45:02
22 HR15@AT&T.BlackBerry.net. 09:45:07

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1	Q	Okay. And did -- well, strike that.	09:45:09
2		When did you first become aware of the	09:45:23
3		HDR22@Clintonemail.com account for the Secretary?	09:45:24
4	A	It would have been around the same time.	09:45:29
5		We were -- we were both transitioning around the	09:45:31
6		same -- same time.	09:45:34
7	Q	Okay. And do you know why Secretary's	09:45:34
8		e-mail address was set up?	09:45:38
9	A	Yes. In -- as I mentioned, she had had a	09:45:42
10		previous e-mail account that was on her BlackBerry.	09:45:46
11		She had had -- been experiencing technical issues.	09:45:50
12		She had been having problems with that BlackBerry,	09:45:53
13		with that e-mail address. And so they also gave her	09:45:55
14		an @Clintonemail.com address so they could help with	09:46:02
15		IT issues.	09:46:05
16	Q	Okay. Do you know if anyone else had any	09:46:06
17		involvement on the technical side of setting up the	09:46:30
18		Clintonemail.com system, other than Justin Cooper?	09:46:32
19	A	I don't know who else was involved.	09:46:36
20	Q	Okay. Do you know who paid for the	09:46:41
21		server?	09:46:43
22	A	I don't.	09:46:43

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1	Q	Do you know who paid for setting up the	09:46:43
2		Clintonemail.com system?	09:46:47
3	A	I don't know.	09:46:49
4	Q	Okay.	09:46:49
5		MS. WOLVERTON: Ramona, I'm sorry, do you	09:46:52
6		mind speaking up just a little bit? It's kind of	09:46:53
7		hard hearing you down here.	09:46:56
8		MS. COTCA: It's a big room. Sure. I'll	09:46:57
9		do my best.	09:47:00
10	Q	How many e-mail accounts were associated	09:47:01
11		with the Clintonemail.com system --	09:47:06
12		MS. WOLVERTON: Objection.	09:47:10
13	Q	-- in 2009?	09:47:11
14		MS. WOLVERTON: Objection. Lack of	09:47:12
15		foundation.	09:47:13
16		MR. BRILLE: Same objection.	09:47:13
17	A	My understanding was Chelsea.	09:47:15
18	Q	Chelsea. And nobody else from the State	09:47:17
19		Department had an e-mail account associated with the	09:47:21
20		Clintonemail.com system --	09:47:23
21		MS. WOLVERTON: Objection --	09:47:25
22	Q	-- that you know of?	09:47:26

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1 MS. WOLVERTON: -- lack of foundation. 09:47:28
2 MR. BRILLE: Same objection. 09:47:29
3 A That's correct. 09:47:30
4 Q Okay. And when you came to the State 09:47:30
5 Department, were you also assigned an e-mail account 09:47:46
6 issued by the State Department? 09:47:51
7 A Yes, I was. 09:47:52
8 Q Okay. And what was that e-mail account? 09:47:52
9 A That was AbedinH@State.gov. 09:47:55
10 Q Okay. And did you use that account for 09:47:59
11 your state-related work? 09:48:02
12 A Yes, I did. 09:48:06
13 Q Okay. Did you also use your e-mail 09:48:07
14 account that was issued with the domain 09:48:09
15 @Clintonemail.com for your State Department work? 09:48:15
16 A My practice was to use my State.gov 09:48:19
17 e-mail. I did the vast majority of my work on 09:48:23
18 State.gov, at my computer and on my BlackBerry when 09:48:27
19 we traveled. 09:48:31
20 And I used Clinton e-mail for just about 09:48:32
21 everything -- everything else. I used that for the 09:48:35
22 Clinton family matters and, frankly, I used it for 09:48:38

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1 my own personal e-mail, as well. 09:48:42

2 Q Okay. But you also used it at times for 09:48:43

3 state-related matters? 09:48:47

4 A Yes. There were occasions when I did do 09:48:48

5 that, correct. 09:48:50

6 Q Okay. And were there occasions when you 09:48:51

7 used that with Secretary Clinton, where both of you 09:48:53

8 used only the Clintonemail.com accounts? 09:48:58

9 MR. BRILLE: Objection. Form. 09:49:01

10 A There were occasions when that -- when 09:49:03

11 that occurred, yes. 09:49:05

12 Q Okay. When you were working at the State 09:49:06

13 Department, other than your Clintonemail.com account 09:49:16

14 and your State.gov account, did you have any other 09:49:19

15 e-mail accounts that you used at any point for 09:49:22

16 work-related matters at the State Department? 09:49:28

17 A I had a Yahoo e-mail, a Yahoo.com e-mail 09:49:33

18 account that was purely a -- a personal account 09:49:37

19 where -- that I rarely used. But there were 09:49:44

20 occasions when I forwarded State Department press 09:49:46

21 clips to that account to be printed. 09:49:50

22 Q Okay. And any other e-mail accounts that 09:49:52

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1 you used when you were at the State Department? 09:49:54

2 A No. 09:49:56

3 Q Okay. And for your State.gov e-mail 09:49:56

4 account, were you issued a BlackBerry by the State 09:50:05

5 Department? 09:50:09

6 A Yes, I was. 09:50:10

7 Q Okay. And other than your State.gov 09:50:10

8 e-mail account, did you have access to any other 09:50:16

9 e-mail accounts for your State Department-issued 09:50:17

10 BlackBerry? 09:50:21

11 A No. We were not allowed to -- to have 09:50:22

12 another e-mail account on our State.gov devices. 09:50:25

13 Q Okay. And how is it that you came to be 09:50:27

14 issued a BlackBerry by the State Department? 09:50:29

15 A My recollection was it was part of the 09:50:33

16 transition process into the State Department. 09:50:35

17 They -- if I remember, somebody came into 09:50:39

18 my office and gave me a box with a BlackBerry in it, 09:50:41

19 and I signed a form. 09:50:44

20 Q Okay. So you didn't ask anybody for a 09:50:45

21 state-issued BlackBerry; you were just given one? 09:50:47

22 A I don't remember asking. I -- I 09:50:51

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1 experienced it as just part of our -- you know, the 09:50:53
2 transition that the new staff at the State 09:50:57
3 Department would -- were -- was receiving, at least 09:51:01
4 in my office. 09:51:03

5 Q Okay. And do you recall who that was who 09:51:03
6 came and handed you the BlackBerry that was issued 09:51:06
7 by the State Department? 09:51:08

8 A I don't specifically remember the -- the 09:51:10
9 person who handed me my BlackBerry, no. 09:51:13

10 Q Okay. Were there any discussions during 09:51:16
11 that time -- and I'm speaking during the 09:51:21
12 transition -- 09:51:26

13 A Yeah. 09:51:26

14 Q -- what you referred to as the transition 09:51:26
15 time, were there any discussions about Secretary 09:51:28
16 Clinton having a BlackBerry for her e-mail use? 09:51:30

17 MS. WOLVERTON: Objection. Vague. 09:51:33

18 MR. BRILLE: Same objection. 09:51:34

19 A I -- I don't remember any conversations 09:51:37
20 during the transition period about giving her a 09:51:39
21 State Department BlackBerry. I -- the only 09:51:45
22 conversations I remember were a few months in, where 09:51:49

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1 she had requested a secure BlackBerry, but that did 09:51:53
2 not come to fruition. 09:51:57

3 Q Okay. Did the Secretary have a BlackBerry 09:51:58
4 for her use as the -- while she was the Secretary of 09:52:03
5 State? 09:52:09

6 A Yes, she did. 09:52:09

7 Q Okay. And how did she come to have that 09:52:10
8 BlackBerry? 09:52:14

9 A That -- 09:52:15

10 MR. BRILLE: Objection to form. 09:52:15

11 Go ahead. 09:52:17

12 A That was the BlackBerry that she had 09:52:17
13 received, you know, in late 2008 at the conclusion 09:52:19
14 of the presidential campaign. 09:52:25

15 Q Okay. 09:52:28

16 A It was her personal BlackBerry that she 09:52:29
17 came in with. 09:52:31

18 Q Okay. And what e-mail account was 09:52:31
19 associated with that BlackBerry? 09:52:33

20 MS. WOLVERTON: Objection. Foundation. 09:52:34

21 MR. BRILLE: Same objection. 09:52:35

22 A That was the HDR22@Clintonemail.com. 09:52:37

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1 Q Okay. Was -- did the Secretary have any 09:52:41
2 other electronic devices, such as smart phones, 09:52:46
3 iPads, mini iPad, that was also connected to her 09:52:49
4 @Clintonemail.com account? 09:52:53
5 MS. WOLVERTON: Objection. Foundation. 09:52:55
6 A When she arrived at State? 09:52:57
7 Q Anytime during her tenure at the State 09:52:58
8 Department. 09:53:01
9 MS. WOLVERTON: Same objection. 09:53:02
10 A While she was at State, I -- she did -- 09:53:04
11 she did obtain an iPad, and that did -- that did 09:53:06
12 have her e-mail account. She could access her 09:53:11
13 e-mail on that, on that iPad. 09:53:17
14 It was not her practice to do so, but when 09:53:20
15 her system on her BlackBerry went down, there was a 09:53:24
16 period where I know she did use her e-mail on her 09:53:27
17 iPad for maybe a week or two, if I remember 09:53:29
18 correctly. 09:53:31
19 Q Okay. And other than the iPad, were there 09:53:32
20 any other smart phones -- 09:53:34
21 MS. WOLVERTON: Same objection. 09:53:37
22 Q -- that Secretary Clinton used to access 09:53:38

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1 her e-mail during her tenure at the State 09:53:40
2 Department? 09:53:42
3 A No. No. 09:53:42
4 Q Okay. Did you -- and this is either 09:53:43
5 during the transition period or shortly after, so 09:53:56
6 late 2008, early 2009. 09:53:59
7 Did you and the Secretary discuss your use 09:54:02
8 of the e-mail with a domain @Clintonemail.com for 09:54:05
9 State Department work? 09:54:12
10 MR. BRILLE: Objection. Form. 09:54:14
11 A I have no recollection having a 09:54:16
12 conversation like that with her. 09:54:18
13 Q Okay. Did you have any such discussions 09:54:19
14 with anybody else at the State Department? 09:54:26
15 MR. BRILLE: Same objection. 09:54:29
16 A Any discussions, I'm sorry, about? 09:54:31
17 Q About how -- about your use of the 09:54:34
18 Clintonemail.com account for State Department 09:54:36
19 work-related matters. 09:54:41
20 A I don't remember having any specific 09:54:42
21 discussions, but the address, it wasn't -- people 09:54:44
22 there -- or is it -- are you okay? 09:54:48

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1	Q	Yeah.	09:54:53
2	A	Sorry. But people at the State Department	09:54:54
3		did have my Clinton e-mail account. They -- when	09:54:56
4		State.gov was down, that's how they contacted me,	09:54:59
5		communicated with me.	09:55:02
6	Q	Okay. And how did they -- well, let's	09:55:03
7		start with, who at the State Department had access	09:55:05
8		to your e-mail, to your Clinton e-mail account?	09:55:08
9	A	I couldn't tell you exactly name by name	09:55:12
10		who had my Clinton e-mail account. It generally	09:55:14
11		were -- were -- was people -- were individuals who	09:55:18
12		needed to communicate, send me a schedule if we were	09:55:21
13		overseas and State.gov was down, the individuals at	09:55:23
14		State who had to send the schedule for the next day	09:55:28
15		or send a document would send it to Clinton e-mail,	09:55:30
16		generally cc State.gov.	09:55:36
17		But I would have given it -- I would have	09:55:39
18		given that address to people as my secondary address	09:55:40
19		when State.gov wasn't working.	09:55:43
20	Q	Okay. And how did they obtain your e-mail	09:55:45
21		account?	09:55:47
22	MR. BRILLE:	Objection. Vague.	09:55:48

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1	MS. WOLVERTON: Same objection.	09:55:50
2	A I would have provided my e-mail address to	09:55:51
3	my colleagues who would need to reach me,	09:55:54
4	particularly if we were -- we were overseas.	09:55:56
5	Q Okay. And what about Secretary Clinton;	09:55:58
6	did she have any discussions with anybody at the	09:56:03
7	State Department -- and this is again in the early	09:56:05
8	2008, two thousand -- late 2008, early 2009 time	09:56:08
9	frame -- about her use of her Clinton e-mail account	09:56:11
10	for State Department business?	09:56:17
11	MS. WOLVERTON: Objection.	09:56:18
12	MR. BRILLE: Objection.	09:56:19
13	MS. WOLVERTON: Lack of foundation, lack	09:56:19
14	of personal knowledge.	09:56:21
15	MR. BRILLE: Same.	09:56:23
16	Q If you know.	09:56:23
17	A I -- I -- I don't know. I -- I don't	09:56:24
18	know.	09:56:26
19	Q Okay. And all of these questions are just	09:56:26
20	based on what you know.	09:56:32
21	A Thank you.	09:56:34
22	Q Do you know why did the Secretary not	09:56:39

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1 continue using her HRC15@ATT.Blackberry.net account 09:56:52
2 exclusively, like she did when she was Senator? 09:57:01
3 MR. BRILLE: Objection. Foundation. 09:57:04
4 MS. WOLVERTON: Same objection. 09:57:05
5 A I think I mentioned earlier she was having 09:57:07
6 problems with that AT&T address. Throughout the 09:57:09
7 presidential campaign she was using it, throughout 09:57:12
8 the 2008 presidential campaign, and was constantly 09:57:18
9 having issues. 09:57:21
10 And so we -- it was just a natural 09:57:22
11 transition. It came with a new device and a new -- 09:57:25
12 a new e-mail address. It was just technical 09:57:29
13 difficulties. 09:57:33
14 Q What came with a new device? 09:57:33
15 A HDR22@Clintonemail.com. 09:57:35
16 Q Okay. Thank you. 09:57:37
17 Did you, during that time frame again, 09:57:42
18 discuss with Secretary Clinton about having a 09:57:44
19 separate e-mail account for state business and 09:57:47
20 having a separate e-mail account for your personal 09:57:49
21 matters? 09:57:51
22 MR. BRILLE: Objection. Asked and 09:57:52

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1	answered.	09:57:53
2	You can answer.	09:57:54
3	MS. WOLVERTON: Same objection.	09:57:54
4	A I don't remember having conversations like	09:57:56
5	that with her, no.	09:57:57
6	Q Do you recall any discussions in late	09:57:58
7	2008, early 2009, about the Secretary -- about	09:58:08
8	Secretary Clinton having an e-mail issued by the	09:58:13
9	State Department for her state-related work?	09:58:16
10	A No, I don't remember.	09:58:19
11	Q Do you know why Secretary Clinton did not	09:58:21
12	want to use a state-issued e-mail account for her	09:58:32
13	state-related work?	09:58:35
14	MS. WOLVERTON: Objection.	09:58:36
15	MR. BRILLE: Objection.	09:58:37
16	MS. WOLVERTON: Lack of foundation,	09:58:38
17	assumes facts not in evidence.	09:58:39
18	MR. BRILLE: Same objection.	09:58:40
19	A So from my understanding, I just saw it as	09:58:42
20	continue doing what she was doing before she arrived	09:58:46
21	at the State Department.	09:58:48
22	She had always had a personal device since	09:58:48

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1 she had started using e-mail. That's what she used 09:58:51
2 when she was in the Senate. She did not have a 09:58:53
3 Senate.gov account. And she also did not have a 09:58:55
4 Hillary Clinton campaign account. 09:58:59

5 She -- I experienced it as continuing the 09:59:01
6 practice that she had had prior to arriving at the 09:59:04
7 State Department, and continuing to use her personal 09:59:08
8 device. 09:59:10

9 Q Okay. 09:59:11

10 A That was a decision that she had made. 09:59:12

11 Q When you started at the State Department 09:59:13
12 and provided your e-mail address to some of the 09:59:16
13 colleagues associated with the Clinton e-mail 09:59:19
14 account, did anybody tell you not to use an e-mail 09:59:23
15 with the Clinton -- not to use the Clinton e-mail 09:59:33
16 account for work-related purposes? 09:59:36

17 MR. BRILLE: Objection. Form. 09:59:39

18 Go ahead. 09:59:39

19 A Well, I don't -- I don't -- I don't 09:59:40
20 remember a specific conversation like that. But as 09:59:42
21 I -- I think I mentioned earlier, we used State.gov 09:59:44
22 for work. That was my -- that was my work e-mail 09:59:48

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1 address. That was my work BlackBerry. That was my 09:59:50
2 primary BlackBerry, particularly when I traveled. I 09:59:52
3 was -- I traveled a good -- a good percentage of my 09:59:55
4 life was on the road, and my State Department 10:00:00
5 BlackBerry was my -- my primary. 10:00:03
6 So I -- I always tried to do the right 10:00:04
7 thing and tried to be on my State.gov BlackBerry. 10:00:07
8 That was my practice. And using Clinton e-mail was 10:00:10
9 not -- was not something that I -- I understood as 10:00:15
10 my primary work e-mail, aside from personal matters 10:00:19
11 as they related to the Secretary and her family and 10:00:24
12 her friends, and then my personal e-mails. 10:00:28
13 Q Okay. But did anybody at the State 10:00:31
14 Department tell you not to use your Clinton e-mail 10:00:36
15 account for State-related purposes? 10:00:39
16 MR. BRILLE: Same objection. 10:00:41
17 A I don't remember a specific conversation 10:00:44
18 with somebody -- with somebody telling -- telling me 10:00:45
19 that. And I assumed it was okay to do. I don't -- 10:00:49
20 as I've stated earlier, my practice was to use 10:00:55
21 State.gov for my work e-mail. 10:00:59
22 Did I think I wasn't allowed to use 10:01:01

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1 Clinton e-mail? No. I thought I -- I thought that 10:01:04
2 was permitted. But my -- my practice was to use 10:01:08
3 State.gov. 10:01:11
4 Q Okay. Do you know if anybody at the State 10:01:12
5 Department told Secretary Clinton not to use her 10:01:15
6 Clinton e-mail account for State-related matters? 10:01:18
7 A Not that I'm aware of. 10:01:21
8 Q Okay. Do you recall when Secretary 10:01:22
9 Clinton first began using her Clinton e-mail 10:01:41
10 account? 10:01:45
11 A It would have been I -- early 2009; late 10:01:45
12 2008, maybe early 2009. 10:01:52
13 Q Okay. And just briefly going back to the 10:01:56
14 Secretary's HR15@AT&T.BlackBerry account. Does she 10:02:06
15 continue using that during her tenure at the State 10:02:15
16 Department? 10:02:17
17 A I believe that -- that that address 10:02:17
18 transitioned out. I think that just went away, and 10:02:19
19 she -- she transitioned to the Clinton e-mail 10:02:22
20 account. 10:02:25
21 I -- I don't know if there was any 10:02:26
22 overlap, and if it would -- if it was during that 10:02:29

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1 transition time. But she transitioned to Clinton 10:02:31
2 e-mail. 10:02:34
3 Q Do you know if that account was 10:02:35
4 deactivated? 10:02:38
5 A I assume -- 10:02:40
6 MR. BRILLE: Objection. Objection. 10:02:41
7 Vague. 10:02:43
8 A I -- I believe so. I certainly -- I 10:02:43
9 certainly was not e-mailing her at that account. 10:02:46
10 Q Okay. Are you aware of any other e-mail 10:02:50
11 accounts that the Secretary may have used for 10:03:01
12 work-related purposes during her tenure at the State 10:03:04
13 Department? 10:03:07
14 A I -- my -- if my memory serves me 10:03:09
15 correctly, I think the HDR22 was the only e-mail 10:03:11
16 address she used, aside from the transition period 10:03:16
17 from the AT&T e-mail address. And then either 10:03:20
18 towards the end of her time at State or after she 10:03:25
19 left State, she transitioned to another e-mail 10:03:27
20 address. 10:03:30
21 Q Okay. When you said the transition 10:03:30
22 period, when she transitioned out of using the 10:03:33

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1	Blackberry.net account --	10:03:35
2	A Uh-huh.	10:03:37
3	Q -- what was -- how long was that period?	10:03:38
4	A I don't know. I would say sometime in	10:03:40
5	early 2009. I couldn't tell you specifically.	10:03:41
6	Q Okay. Thank you.	10:03:43
7	Are you familiar with an e-mail address	10:03:48
8	HR15@ATT.Blackberry.net for Secretary Clinton?	10:03:51
9	A I believe that's the e-mail address we've	10:03:55
10	been discussing.	10:03:57
11	Q Well, this is HR15, not HRC15.	10:03:58
12	A I -- I honestly can't remember. I know	10:04:06
13	she had an AT&T.Blackberry.net address. I -- the	10:04:08
14	first few -- I think that was HR15.	10:04:13
15	Q Okay.	10:04:15
16	A I'm sorry. I don't -- I don't -- I don't	10:04:16
17	know the -- the difference between those two e-mail	10:04:18
18	addresses.	10:04:20
19	Q Okay. And you accessed your Clinton	10:04:20
20	e-mail account via your BlackBerry associated with	10:04:36
21	that account. Right?	10:04:39
22	A I had a BlackBerry, and I could access it	10:04:40

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1 from a desktop, as well. 10:04:41

2 Q Okay. 10:04:43

3 MR. MYERS: Ramona, I'm sorry. It's 10:04:46

4 really hard to hear. If you could speak up again. 10:04:50

5 MS. COTCA: Sorry. Thanks for the 10:04:52

6 reminder. 10:04:54

7 Q Do you know Clarence Finney? 10:05:02

8 A I do know Clarence Finney, yes. 10:05:03

9 Q And who is Clarence Finney during your 10:05:05

10 time at the State Department? 10:05:07

11 A He was responsible for the records and 10:05:08

12 management office. 10:05:09

13 Q Okay. And he was the director of the 10:05:10

14 office. Correct? 10:05:12

15 A Yes. I'm not sure if that was his exact 10:05:14

16 title, but that was my understanding, yes. 10:05:15

17 Q Okay. Did Mr. Finney know about your 10:05:17

18 Clintonemail.com account? 10:05:20

19 MS. WOLVERTON: Objection. Lack of 10:05:22

20 foundation, personal knowledge. 10:05:23

21 A About my Clinton e-mail? 10:05:25

22 MR. BRILLE: Hold on a second. You've got 10:05:26

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1	to give them a chance to make objections. She	10:05:27
2	made --	10:05:29
3	THE WITNESS: Sorry. I apologize.	10:05:29
4	MR. BRILLE: That's okay. That's okay.	10:05:30
5	She made an objection.	10:05:31
6	I'll -- I'll say same objection.	10:05:32
7	Now you can answer.	10:05:34
8	A About my Clintonemail.com account?	10:05:39
9	Q Yeah. Did he have knowledge about your	10:05:41
10	account?	10:05:43
11	MS. WOLVERTON: Same objection.	10:05:44
12	MR. BRILLE: Same objection.	10:05:45
13	A I don't know.	10:05:46
14	Q Did you ever give him your e-mail address	10:05:47
15	on the Clintonemail.com account?	10:05:52
16	A I don't remember if I specifically gave it	10:05:55
17	to Clarence.	10:05:57
18	Q Okay. Did you give it to anybody in his	10:05:58
19	office?	10:06:00
20	A I don't know. I think Clarence was the	10:06:04
21	only person in that office I -- I have communicated	10:06:05
22	with.	10:06:09

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1 Q Okay. How did you normally communicate 10:06:10
2 with Mr. Finney? 10:06:11

3 A I remember two specific occasions when we 10:06:13
4 had first arrived, of having a meeting with my team 10:06:17
5 about the kinds of materials that we could bring in. 10:06:22
6 The Secretary did have a lot of personal files 10:06:26
7 coming in with her. And discussing what we would 10:06:28
8 bring in and where it would go. 10:06:32

9 And then I remember before we left we had 10:06:34
10 a meeting again with the same team and Clarence 10:06:36
11 about what we were allowed to take. And he 10:06:39
12 instructed us on the process that we needed to go 10:06:42
13 through to review our materials and place them in 10:06:45
14 boxes, which his office -- he and his office then 10:06:50
15 reviewed and pulled out what they determined we 10:06:53
16 could not take with us, and the other boxes we were 10:06:58
17 allowed to leave with. 10:07:02

18 Q Do you know if Mr. Finney was aware of 10:07:03
19 Secretary Clinton's e-mail on the Clintonemail.com 10:07:08
20 system? 10:07:12

21 A I don't know if he was. 10:07:13

22 Q Do you know Stephen Mull? 10:07:14

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1	A	I do know Steve, yes.	10:07:26
2	Q	Okay. And he was working at the State	10:07:28
3		Department when you were there. Correct?	10:07:30
4	A	Yes.	10:07:31
5	Q	Okay. And what was his position with the	10:07:31
6		State Department?	10:07:33
7	A	He was -- he was the Executive Secretary.	10:07:35
8	Q	Okay. And did you, during your work for	10:07:40
9		the State Department, did you on occasion	10:07:44
10		communicate and interact with Mr. Mull for	10:07:47
11		work-related purposes?	10:07:50
12	A	Yes. I -- I saw Steve when he was --	10:07:51
13		during the period that he was Executive Secretary I	10:07:55
14		saw him every day.	10:07:57
15	Q	Okay. And did you provide your e-mail	10:07:58
16		account associated with the Clintonemail.com system	10:08:01
17		to Mr. Mull?	10:08:07
18	A	I don't know if Steve -- I specifically	10:08:10
19		gave it to Steve. I can't remember if Steve had it.	10:08:13
20	Q	Okay. How about Lewis Lukens; do you know	10:08:20
21		Mr. Lukens?	10:08:25
22	A	I do know -- I do know Lew, yes.	10:08:27

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1 Q Okay. And he also was working with you at 10:08:30
2 the State Department. Correct? 10:08:32
3 A Yes. 10:08:33
4 Q Okay. And what was Mr. Lukens' position 10:08:34
5 then? 10:08:36
6 A He was also in the Executive Secretariat. 10:08:36
7 Q Okay. And did you interact with 10:08:38
8 Mr. Lukens during your time at the State Department 10:08:42
9 for work-related matters? 10:08:45
10 A Yes. On a daily basis, and in many 10:08:47
11 countries around the world. 10:08:50
12 Q Okay. And did Mr. Lukens -- did you 10:08:51
13 provide him your e-mail address associated with your 10:08:53
14 account on the Clintonemail.com system? 10:08:57
15 A You are testing my memory. 10:09:00
16 I don't know if -- I don't know if Lew had 10:09:02
17 it, but I would be surprised if he didn't. Because 10:09:05
18 a lot of times State.gov wasn't working was when we 10:09:09
19 were overseas, and so many people would just -- 10:09:14
20 would e-mail me, sometimes they would e-mail me on 10:09:18
21 my State.gov address and cc my Clinton e-mail. So 10:09:22
22 it wasn't -- it wasn't unknown. 10:09:26

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1 I don't specifically remember giving it 10:09:27
2 to -- giving it to Lew, but I would be surprised if 10:09:30
3 he wasn't aware. 10:09:32

4 Q Okay. And do you know if Mr. Lukens was 10:09:33
5 aware of the Secretary's e-mail account associated 10:09:38
6 with the e-mail -- the Clintonemail.com system? 10:09:42

7 A I -- Lew would have been aware that the 10:09:47
8 Secretary was e-mailing on her BlackBerry. It was 10:09:48
9 something that she did on a regular basis and very 10:09:51
10 actively when we weren't in the office. 10:09:54

11 And as I mentioned earlier, he traveled 10:09:57
12 everywhere with us. So he was aware that she was 10:09:59
13 e-mailing, and that she had a BlackBerry device. 10:10:02

14 I don't know that Lew had her e-mail 10:10:07
15 address. 10:10:08

16 Q Okay. And when the Secretary was 10:10:08
17 e-mailing on a regular basis, that was for State 10:10:12
18 Department matters? 10:10:15

19 MR. BRILLE: Objection. Foundation. 10:10:16

20 MS. WOLVERTON: Objection. Same 10:10:17
21 objection. 10:10:18

22 A I wasn't reading her e-mails. There 10:10:19

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1 were -- there -- so I couldn't tell you specifically 10:10:22

2 what was -- what she was e-mailing about. 10:10:25

3 But there was certainly a lot of personal 10:10:27

4 things she was e-mailing on that device. And she 10:10:30

5 did use that address to stay in touch with the -- 10:10:33

6 the department when she was traveling. 10:10:38

7 But it was not where she did most of her 10:10:40

8 work, since most of her work was done in person or 10:10:42

9 by paper or on the phone. 10:10:45

10 Q Okay. But is it fair to say that the 10:10:46

11 Secretary e-mailed frequently for State-related 10:10:48

12 matters via her BlackBerry? 10:10:51

13 MS. WOLVERTON: Objection. Lack of 10:10:52

14 foundation, lack of personal knowledge. 10:10:54

15 A I have no way of knowing the answer to 10:10:56

16 that question. 10:10:58

17 Q Okay. You are aware that the Secretary 10:11:00

18 returned approximately 55,000 pages of e-mails from 10:11:06

19 her Clintonemail.com account as federal records? 10:11:10

20 MR. BRILLE: Objection. Form, foundation. 10:11:14

21 MS. WOLVERTON: Same objections. 10:11:16

22 A I did read that, yes. 10:11:17

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1	Q	Do you know if Mr. Lukens was ever told	10:11:18
2		that the Secretary was using her BlackBerry only for	10:11:33
3		personal matters?	10:11:40
4	MR. BRILLE:	Objection. Form.	10:11:42
5		Foundation.	10:11:44
6	A	I don't know.	10:11:45
7	Q	Did you ever tell Mr. Lukens that the	10:11:45
8		Secretary was using her BlackBerry only -- to e-mail	10:11:52
9		for personal matters only?	10:11:55
10	MR. BRILLE:	Same objection.	10:11:57
11	A	I don't recall having a conversation like	10:11:59
12		that with Lew.	10:12:00
13	Q	Is that something you would have told	10:12:01
14		anybody?	10:12:03
15	MS. WOLVERTON:	Objection.	10:12:04
16	Q	During your time at the State Department.	10:12:04
17	MR. BRILLE:	Same objection.	10:12:06
18	A	I don't know that it would have -- I don't	10:12:07
19		know that it would have occurred to me. So, no, it	10:12:09
20		doesn't -- I don't know -- I don't know why that	10:12:12
21		would -- why that would occur to me.	10:12:15
22	Q	Okay. Well, because the Secretary used	10:12:19

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1 her e-mail account for State Department matters, as 10:12:22
2 well. Correct? 10:12:25
3 MR. BRILLE: Objection. Form. Vague. 10:12:27
4 MS. WOLVERTON: Same objections. 10:12:29
5 A Yeah. Yes, she -- she absolutely did 10:12:31
6 that. She absolutely did that. 10:12:34
7 But it was -- she was e-mailing with many 10:12:36
8 people at the State Department and outside the State 10:12:39
9 Department. So it's -- it wasn't a secret that she 10:12:42
10 was using this e-mail account to be communicating 10:12:45
11 with U.S. government officials, because they were 10:12:49
12 receiving e-mails from her. 10:12:52
13 Q Upon becoming the head of the agency, did 10:12:54
14 the Secretary request authorization from anyone at 10:12:59
15 the State Department to use her Clintonemail.com for 10:13:03
16 State Department business? 10:13:07
17 MS. WOLVERTON: Objection. Lack 10:13:09
18 of foundation. 10:13:10
19 Q If you know. 10:13:11
20 MS. COTCA: I'm sorry. 10:13:13
21 A Not that -- not that I'm aware of. 10:13:14
22 Q Okay. And when you used your 10:13:16

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1 Clintonemail.com account for your work-related 10:13:20
2 matters -- 10:13:23
3 A Yes. 10:13:25
4 Q -- with the Secretary, she didn't object 10:13:25
5 to your use of that. Correct? 10:13:31
6 MR. BRILLE: Object to the form. 10:13:33
7 Foundation, and vague. 10:13:34
8 MS. WOLVERTON: Same objections. 10:13:36
9 MR. BRILLE: When you say "work-related 10:13:38
10 matters," I'm just asking for clarification. You 10:13:39
11 mean State? 10:13:42
12 Q When I say -- let's clarify that for the 10:13:42
13 record. 10:13:44
14 MR. BRILLE: Yeah. Thanks. 10:13:45
15 Q When I say State -- or "work-related 10:13:46
16 matters," I'm strictly speaking of State-related 10:13:48
17 work. 10:13:54
18 A Do you mind asking me the question again? 10:13:54
19 Q Sure. No problem. 10:13:56
20 When you e-mailed with the Secretary via 10:13:57
21 your Clintonemail.com account during your time at 10:13:59
22 the State Department, did the Secretary Clinton -- 10:14:04

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1	did Secretary Clinton ever object to your use of	10:14:10
2	that account for State Department business?	10:14:12
3	A No, not that I remember. No.	10:14:15
4	Q Who else was in the Office of the	10:14:17
5	Secretary during your tenure at the State	10:14:36
6	Department? Who else worked within the Office of	10:14:38
7	the Secretary?	10:14:40
8	MR. BRILLE: During the entire tenure?	10:14:41
9	Q During your entire tenure at the State	10:14:43
10	Department.	10:14:45
11	A Would you like me to go specifically	10:14:46
12	through the individuals or ...	10:14:48
13	Q Yes.	10:14:51
14	A She had -- she had a primary assistant in	10:14:54
15	the office, who is a career foreign service officer	10:15:00
16	who sat outside her office.	10:15:03
17	Q Who was that?	10:15:05
18	A Claire Coleman.	10:15:06
19	Q Claire Coleman?	10:15:08
20	A Yeah.	10:15:09
21	Q Okay.	10:15:10
22	A She had a personal aide, Monica Hanley,	10:15:13

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1 who traveled with her and also was in the office to 10:15:15
2 provide support. 10:15:19

3 She had a director of scheduling, Lona 10:15:21
4 Valmoro, and Linda Dewan, who also assisted with 10:15:24
5 scheduling, primarily in the building is what Linda 10:15:31
6 was responsible for. 10:15:33

7 There was the executive assistant, it was 10:15:36
8 Joe Macmanus for a period, and then Alice Wells for 10:15:39
9 a period. 10:15:42

10 There were two line officers. They -- 10:15:43
11 they changed over time, there were several of them 10:15:49
12 that were responsible for the paper that went in and 10:15:51
13 came out of the Secretary's office. 10:15:54

14 Dan Fogarty, who was also -- I believe he 10:15:57
15 was a civil servant, who was responsible for the 10:16:02
16 correspondence, the official correspondence when 10:16:05
17 Secretary Clinton went overseas, to do thank-you 10:16:09
18 notes. 10:16:11

19 Rob Russo, who was -- who was responsible 10:16:13
20 for all of her personal correspondence. Lauren 10:16:17
21 Jiloty -- 10:16:21

22 Q Just very briefly, when you say "personal 10:16:22

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1 A As I mentioned earlier, she was the -- the 10:17:07
2 Secretary's personal aide who traveled with her. 10:17:10
3 Q Okay. And how about Lauren Jiloty? 10:17:12
4 A Lauren Jiloty was her assistant in the 10:17:16
5 office as well. She provided support to Claire. 10:17:19
6 And she would often travel, she and Monica switched 10:17:23
7 out traveling. And then she left shortly after -- I 10:17:26
8 believe she left -- I can't put a date on it, but 10:17:30
9 she was not there for the entire tenure. 10:17:33
10 Q And if you know, to the extent that you 10:17:35
11 know, did Secretary Clinton frequently communicate 10:17:43
12 with -- with the staff within the Secretary's 10:17:48
13 office, during her tenure at the State Department, 10:17:53
14 for State Department business? 10:17:55
15 MS. WOLVERTON: Objection. Vague. 10:17:57
16 MR. BRILLE: Same objection. 10:17:58
17 A She communicated with all the individuals 10:18:00
18 on that list on a regular basis every day in the 10:18:02
19 office. And then when she was on the road, some 10:18:05
20 combination of these people were either with her or 10:18:08
21 she spoke. She would call back to the department on 10:18:11
22 a regular basis when she was overseas. 10:18:13

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1 Q Okay. And to the extent that you know, 10:18:15
2 did the Secretary communicate via her e-mail account 10:18:22
3 with leadership of the State Department? 10:18:27
4 MS. WOLVERTON: Objection. Vague. 10:18:33
5 MR. BRILLE: Same objection. 10:18:34
6 A Yes, she did. 10:18:35
7 Q Okay. That would include Patrick Kennedy? 10:18:35
8 A I -- I would imagine it included Pat 10:18:39
9 Kennedy. I don't know that she and Pat specifically 10:18:42
10 e-mailed. But -- I guess I can't tell you 10:18:44
11 specifically if Pat e-mailed with her. But I would 10:18:50
12 imagine he did. 10:18:53
13 Q Okay. How about Harold Koh? 10:18:53
14 A Same. I don't know if Harold e-mailed 10:19:01
15 with her directly. But both of them were part of 10:19:04
16 the senior team that met with her every day. And 10:19:08
17 everybody was aware that she would e-mail. So the 10:19:13
18 short answer is I don't know if Harold specifically 10:19:16
19 e-mailed with her, but I believe he did. 10:19:19
20 Q Okay. And then also during the 10:19:21
21 Secretary's tenure at the State Department, to the 10:19:23
22 extent that you know -- 10:19:26

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1 MS. WOLVERTON: Same objection. Same 10:20:21
2 instruction. 10:20:22
3 BY MS. COTCA: 10:20:27
4 Q Ms. Abedin, did you have an e-mail account 10:20:28
5 on the PresidentClinton.com -- or with the 10:20:29
6 PresidentClinton.com domain? 10:20:32
7 MR. BRILLE: Same -- 10:20:34
8 MS. WOLVERTON: Yeah, I would -- 10:20:36
9 MR. BRILLE: Same objection. 10:20:38
10 MS. WOLVERTON: Yeah. Objection. Beyond 10:20:39
11 the scope of discovery. 10:20:41
12 MS. COTCA: Are you instructing her not to 10:20:42
13 answer? 10:20:43
14 MR. BRILLE: Yeah. I'm going to instruct 10:20:43
15 her not to answer. 10:20:45
16 MS. COTCA: Okay. 10:20:46
17 BY MS. COTCA: 10:20:47
18 Q Did you have an e-mail account with the 10:20:53
19 domain PresidentClinton.com during your time at 10:20:54
20 the -- at the State Department? 10:20:58
21 MS. WOLVERTON: Objection. Extends beyond 10:21:00
22 the scope of discovery. 10:21:02

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1	MR. BRILLE: I'm going to lodge the same	10:21:05
2	objection, but I'm going to let you answer the	10:21:06
3	question.	10:21:08
4	A No, I did not.	10:21:09
5	Q Okay. Simple. Thank you.	10:21:10
6	During your tenure at the State	10:21:30
7	Department, who oversaw the operation of the	10:21:32
8	Clintonemail.com system?	10:21:35
9	MS. WOLVERTON: Objection. Lack of	10:21:37
10	foundation.	10:21:38
11	MR. BRILLE: Same. Objection.	10:21:38
12	A I can speak to when I was having	10:21:42
13	challenges with my e-mail or delays or when the	10:21:44
14	Secretary was and I would call Justin or Bryan,	10:21:47
15	depending on the time. And as I think I may have	10:21:51
16	indicated before, I'm unclear, I'm a little fuzzy on	10:21:54
17	when it was Justin versus Bryan, but it was one of	10:21:58
18	the two of them.	10:22:00
19	Q Okay. And when you contacted Bryan --	10:22:01
20	when you say "Bryan," you mean Bryan Pagliano.	10:22:03
21	Correct?	10:22:04
22	A Yes.	10:22:05

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1 Q Okay. And when you contacted 10:22:05
2 Mr. Pagliano, how did you usually reach out to him? 10:22:07
3 A I usually reached out to Justin, and he 10:22:11
4 would say on this -- you know, ask Bryan. It was 10:22:13
5 usually Justin. 10:22:17
6 I think I probably just e-mailed with him, 10:22:20
7 probably, and said it's not working, can you help 10:22:22
8 fix whatever specific matter it was. 10:22:24
9 Q When you say you usually e-mailed with 10:22:26
10 him, you're referring to Mr. Pagliano. Right? 10:22:30
11 A I -- 10:22:33
12 MR. BRILLE: Objection. 10:22:33
13 THE WITNESS: Sorry. 10:22:35
14 MR. BRILLE: Form. 10:22:36
15 Go ahead. 10:22:37
16 A My first point was always Justin. 10:22:37
17 Q Okay. 10:22:39
18 A And either Justin would correct it, and 10:22:39
19 there was a period where I remember him saying, 10:22:41
20 Check with Bryan. 10:22:44
21 I don't remember having many interactions. 10:22:46
22 These -- the outreach would happen when there was a 10:22:49

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1 problem. And it wasn't -- I couldn't put a number 10:22:51
2 on how many instances that was. So I either would 10:22:57
3 have called Bryan or e-mailed Bryan, but ... 10:22:59
4 Q When you e-mailed Bryan Pagliano -- 10:23:02
5 A Yes. 10:23:05
6 Q -- to what e-mail account did you send 10:23:05
7 your e-mail? 10:23:07
8 A I don't remember Bryan's e-mail address. 10:23:11
9 Q Did you send -- did you e-mail 10:23:13
10 Mr. Pagliano to his State Department-issued e-mail 10:23:17
11 account? 10:23:22
12 A I'm not sure. I'm not sure if I did. 10:23:23
13 Q Did you have an e-mail address for 10:23:26
14 Mr. Pagliano over than his State Department e-mail 10:23:33
15 address? 10:23:36
16 A I believe the e-mail address I would have 10:23:38
17 used would have been what we had prior to coming to 10:23:41
18 the State Department. So I don't know if it would 10:23:45
19 have been a Gmail. I'm completely speculating if it 10:23:47
20 was -- 10:23:50
21 MR. BRILLE: Hold on a second. 10:23:50
22 THE WITNESS: Sorry. 10:23:51

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1 MR. BRILLE: They don't want you to 10:23:52
2 completely speculate. 10:23:55
3 THE WITNESS: Okay. So I'm sorry. 10:23:55
4 MR. BRILLE: If the answer is "I don't 10:23:56
5 know," the answer is "I don't know." But they don't 10:23:57
6 want you to completely speculate. They want your 10:23:59
7 personal knowledge. 10:24:01
8 A I don't -- 10:24:02
9 MR. BRILLE: Okay. So -- 10:24:03
10 A I don't -- I don't know where I e-mailed 10:24:04
11 Bryan. 10:24:05
12 Q Okay. And I don't want you to speculate. 10:24:06
13 But from my understanding in what you are saying is 10:24:10
14 then Mr. Pagliano did have another -- and I'm not 10:24:13
15 sure which one it is -- a different e-mail account, 10:24:18
16 other than his State.gov account. Is that fair? 10:24:20
17 A I don't know where I e-mailed Bryan. I 10:24:27
18 could not tell you. I can tell you where I e-mailed 10:24:29
19 Justin. I don't know where I e-mailed Bryan. It 10:24:32
20 was not that frequent. This was not something that 10:24:33
21 happened very often. 10:24:36
22 Q Prior to coming to the State Department, 10:24:38

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1	did you ever e-mail Bryan Pagliano about -- about	10:24:49
2	anything?	10:24:55
3	MR. BRILLE: Objection. Vague, scope.	10:24:56
4	Do you want to tell me how this is in the	10:24:59
5	scope?	10:25:01
6	MS. WOLVERTON: I'm sorry --	10:25:02
7	Q About your State Department business?	10:25:02
8	MS. WOLVERTON: I'm sorry. Could you	10:25:03
9	repeat the question? I didn't hear it.	10:25:04
10	MS. COTCA: Sure.	10:25:07
11	Q Prior to May 2009, did you ever e-mail	10:25:08
12	with Mr. Pagliano about State Department business?	10:25:09
13	A No.	10:25:12
14	Q Okay. Did you ever e-mail with	10:25:12
15	Mr. Pagliano prior to May of 2009 about e-mail	10:25:27
16	issues with the Clintonemail.com system?	10:25:28
17	A Prior to 2009?	10:25:36
18	Q Prior to May of 2009.	10:25:36
19	A I don't know.	10:25:44
20	Q Do you know John Bentel?	10:25:44
21	A I don't know who that is.	10:25:55
22	Q Did you ever interact with the IRM office	10:25:56

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1 for the Executive Secretariat, when you were at the 10:26:03
2 State Department, for e-mail-related issues? 10:26:06
3 MS. WOLVERTON: Objection. Lack of 10:26:11
4 foundation. 10:26:12
5 A I'm sure I did. 10:26:13
6 Q Okay. Do you remember -- do you know who 10:26:14
7 you would interact within that office regarding 10:26:25
8 e-mail-related issues? 10:26:28
9 A Usually if there was a problem with 10:26:30
10 State.gov e-mail, we just picked up the phone and 10:26:31
11 called the help desk and said, I'm having a 10:26:35
12 challenge. If I was in the office somebody would 10:26:37
13 come over and address it. 10:26:39
14 If we were on the road we would ask our 10:26:41
15 colleagues who were traveling with us for 10:26:45
16 assistance. 10:26:47
17 So I don't -- I don't have a -- I don't 10:26:50
18 have a specific name of a person that I would have 10:26:51
19 worked with in that office to address e-mail issues. 10:26:53
20 Q Okay. Did you ever raise issues with the 10:26:55
21 Secretary's e-mail account with someone in that 10:26:57
22 office? 10:27:00

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1	A	I may have.	10:27:04
2	Q	And do you recall who you would have	10:27:06
3		raised that issue with?	10:27:10
4	A	I could -- I couldn't tell you. I	10:27:15
5		don't -- I don't know that I could name people who	10:27:17
6		worked in that office.	10:27:19
7	Q	Okay. Did you ever discuss any of the	10:27:21
8		e-mail issues that Secretary Clinton had for use at	10:27:35
9		the State Department with Lewis Lukens?	10:27:42
10		MS. BERMAN: Sorry. With who?	10:27:51
11		MS. COTCA: With Lewis Lukens.	10:27:52
12		MR. BRILLE: Objection. Form.	10:27:53
13	A	I don't remember having any conversations	10:27:55
14		with Lew about it. But that -- I just don't	10:27:56
15		remember conversations specifically with Lew.	10:28:01
16	Q	How about with Mr. Mull?	10:28:03
17	A	I -- I remember an exchange with -- with	10:28:14
18		Steve during a specific period, during a hurricane,	10:28:18
19		about challenges she was having, yes.	10:28:23
20	Q	Okay. And what was that exchange?	10:28:24
21	A	Just that she was having communications	10:28:27
22		issues in the midst of a hurricane.	10:28:29

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1 Q Okay. And did you discuss with him at all 10:28:31
2 as to how to resolve the e-mail issues that the 10:28:36
3 Secretary was having? 10:28:39
4 A Yes. We had an exchange at the time about 10:28:41
5 how to try and resolve the issues. 10:28:42
6 Q Okay. And what was the discussion or the 10:28:44
7 exchange about how to resolve the issue? 10:28:47
8 A Well, I -- I was -- I remember I was away 10:28:50
9 and she was away. And it was the midst of 10:28:53
10 hurricane -- 10:28:59
11 Q Hurricane Sandy, maybe? 10:28:59
12 A I think it was Hurricane Irene. I always 10:29:01
13 get the hurricanes confused. But I think it was 10:29:03
14 Hurricane Irene. And I was -- I was pregnant. I 10:29:06
15 had taken a little break. I was overseas, I was 10:29:09
16 several hours ahead. And I -- I remember -- and she 10:29:13
17 was also on a vacation with her family. 10:29:16
18 And -- and she was having both phone and 10:29:22
19 BlackBerry issues. And while I was away there were 10:29:27
20 other people at the department that were trying to 10:29:31
21 help address how to -- how to fix the communications 10:29:33
22 issues. 10:29:38

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1	Q	Okay. And when you say "communications	10:29:38
2		issues," that included e-mail issues for the	10:29:40
3		Secretary. Correct?	10:29:44
4	A	It did, yes.	10:29:45
5	Q	Okay. And who else at the State	10:29:46
6		Department was also assisting with trying to resolve	10:29:48
7		the e-mail issues that the Secretary was having at	10:29:51
8		that time?	10:29:54
9	A	From my memory it was our chief of staff	10:29:54
10		and it was Steve, and her assistant who was with	10:29:56
11		her.	10:30:01
12	Q	Whose assistant?	10:30:02
13	A	The Secretary's assistant.	10:30:03
14	Q	And which assistant was that?	10:30:06
15	A	Monica Hanley.	10:30:08
16	Q	Do you recall how it was ultimately	10:30:09
17		resolved?	10:30:15
18	A	I think the hurricane ended and the -- the	10:30:16
19		phone lines -- the phone at the house was what was	10:30:20
20		the challenges, that she couldn't get any calls	10:30:23
21		placed to the house, the -- so once the -- the	10:30:25
22		weather challenges had subsided, you -- the phone	10:30:31

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1	network was restored, and I think e-mail	10:30:36
2	connectivity was restored, as well.	10:30:39
3	Q Okay. Do you know who knew at the State	10:30:42
4	Department that Mr. Pagliano was providing technical	10:30:58
5	support for the Clintonemail.com system?	10:31:01
6	A I don't know.	10:31:03
7	Q Do you know if Mr. -- or if Patrick	10:31:03
8	Kennedy was aware that Mr. Pagliano was providing	10:31:10
9	technical support for the Clintonemail.com system	10:31:13
10	during his tenure at the State Department?	10:31:15
11	MR. BRILLE: Objection. Foundation.	10:31:17
12	A I don't know.	10:31:19
13	Q Okay. Who at the State Department, as far	10:31:19
14	as you know, knew that the server for the	10:31:39
15	Clintonemail.com system was located in Secretary	10:31:42
16	Clinton's residence in New York?	10:31:46
17	MR. BRILLE: Objection. Foundation.	10:31:48
18	A I don't know.	10:31:50
19	MS. COTCA: All right. We've been going	10:31:58
20	about an hour. We'll take a five-minute break.	10:31:59
21	MR. BRILLE: Okay. Sounds good.	10:32:01
22	VIDEO SPECIALIST: We are off the record	10:32:03

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1	at 10:32.	10:32:04
2	(A recess was taken.)	10:32:06
3	VIDEO SPECIALIST: Here begins Tape 2. We	10:51:43
4	are back on the record at 10:51.	10:51:55
5	BY MS. COTCA:	10:51:57
6	Q Okay. Ms. Abedin, just a couple followup	10:51:58
7	questions in relation to Secretary Clinton's e-mail	10:52:01
8	account.	10:52:06
9	Who gave the BlackBerry and e-mail address	10:52:06
10	to Secretary Clinton, if you know?	10:52:10
11	A I -- I don't -- I don't know. I suspect	10:52:15
12	it was Justin, who gave it to me, as well.	10:52:18
13	Q Do you know who actually set up the	10:52:22
14	server?	10:52:29
15	A No, I don't.	10:52:29
16	Q And you also said, I believe your	10:52:30
17	testimony earlier this morning was that you came to	10:52:37
18	understand that Secretary Clinton was continuing her	10:52:39
19	practice to use a personal account for the reason	10:52:43
20	for having the Clintonemail.com account.	10:52:46
21	I know I'm rephrasing it, but is that a	10:52:50
22	fair summary?	10:52:53

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1	MR. BRILLE: Objection. Form.	10:52:54
2	A I -- I think the -- the -- it's fair --	10:52:56
3	she had one BlackBerry device with one e-mail	10:53:00
4	account. She had always had one BlackBerry device	10:53:03
5	with one e-mail account that she used as her primary	10:53:06
6	e-mail. And it was a device and an account that she	10:53:09
7	provided personally.	10:53:12
8	Q Okay. And how is it that you came to	10:53:13
9	learn that she preferred to continue that practice	10:53:17
10	at the State Department?	10:53:20
11	MS. WOLVERTON: Objection. Lack of	10:53:22
12	foundation, lack of personal knowledge.	10:53:23
13	MR. BRILLE: Same objection.	10:53:25
14	A It was in the course of normal business,	10:53:27
15	she -- she carried that one device and continued	10:53:31
16	working on that one device as we were at State, as	10:53:34
17	she had in previous -- in the previous years.	10:53:36
18	Q Okay. But you didn't actually have	10:53:40
19	conversations with the Secretary about her wanting	10:53:41
20	to continue that practice at the State Department?	10:53:43
21	A I can only tell you what I observed, which	10:53:47
22	is her continuing to use one device and one e-mail	10:53:49

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1 account. 10:53:52

2 Q Fair. Thank you. 10:53:52

3 You also testified that you were 10:53:56

4 prohibited to have other e-mail accounts associated 10:53:59

5 with your State Department-issued BlackBerry. 10:54:02

6 Do you recall that testimony? 10:54:07

7 A Yes. That was my understanding. 10:54:08

8 Q Okay. How did you come to have that 10:54:10

9 understanding? 10:54:12

10 A It was just a general knowledge amongst 10:54:13

11 those of us who were coming in from the outside, 10:54:15

12 joining the State Department. The -- the political 10:54:19

13 appointees who came in, many people came with 10:54:22

14 separate devices. And we understood that we were 10:54:26

15 not able to put the Gmail accounts, if you will, or 10:54:29

16 whatever additional e-mail accounts, onto our State 10:54:32

17 Department BlackBerrys. 10:54:35

18 Q Okay. Did anybody from the State 10:54:36

19 Department inform you that you couldn't have a 10:54:38

20 separate e-mail account put on your State 10:54:40

21 Department-issued BlackBerry? 10:54:43

22 A I don't remember a specific conversation 10:54:45

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1 with a State Department official. I do know what 10:54:47
2 our -- all of our understanding was that we could 10:54:51
3 not, on the State Department device that we were 10:54:53
4 carrying, we were not allowed to put any other 10:54:56
5 accounts on there. I -- that was clear. 10:54:58

6 Q And if you know, do you know why you were 10:55:01
7 not allowed to have other e-mail accounts associated 10:55:03
8 with your State Department-issued BlackBerry? 10:55:07

9 MS. WOLVERTON: Objection. Extends beyond 10:55:10
10 the scope of the authorized discovery. 10:55:12

11 A I -- 10:55:14

12 MR. BRILLE: Same objection. 10:55:15

13 You can answer, if you know. 10:55:16

14 A I don't know. It's only -- I only know 10:55:17
15 what I practiced, which was the two different 10:55:20
16 BlackBerrys. 10:55:22

17 Q Okay. During your time at the State 10:55:22
18 Department, did you consult -- did you or the 10:55:48
19 Secretary consult with your use of the Clinton 10:55:52
20 e-mail account for State Department work with 10:55:55
21 anybody in the legal advisor's office? 10:56:00

22 MS. WOLVERTON: Objection on multiple 10:56:04

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1 grounds. Lack of foundation, lack of personal 10:56:05
2 knowledge, calls for attorney-client communications 10:56:07
3 that are privileged. And beyond the scope of 10:56:11
4 discovery. 10:56:13
5 MR. BRILLE: I'll -- I'll echo those 10:56:14
6 objections and instruct the witness not to answer. 10:56:16
7 Q Did you consult with anyone from Clarence 10:56:19
8 Finney's office about the use of the 10:56:36
9 Clintonemail.com for State-related matters? And 10:56:40
10 when I said "you," either for -- on your behalf or 10:56:46
11 on behalf of the Secretary. 10:56:49
12 MS. WOLVERTON: Objection. Vague. 10:56:51
13 MR. BRILLE: You can answer. 10:56:53
14 A I don't recall any conversations. 10:56:54
15 Q All right. Did you or the Secretary or 10:56:56
16 anyone on behalf of the Secretary consult with 10:56:59
17 anybody in Patrick Kennedy's office about your use 10:57:01
18 of the Clintonemail.com accounts for State 10:57:05
19 Department business? 10:57:08
20 MS. WOLVERTON: Objection. Lack of 10:57:09
21 foundation, lack of personal knowledge. 10:57:10
22 A Not that I remember. 10:57:14

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1 Q Okay. How about with anyone in the IRM 10:57:15
2 office or the Executive Secretariat; did you or the 10:57:20
3 Secretary or anyone on behalf of the Secretary 10:57:26
4 consult with them about your use of the 10:57:28
5 Clintonemail.com accounts for State Department 10:57:31
6 business? 10:57:34
7 MS. WOLVERTON: Objection. Lack of 10:57:35
8 foundation, lack of personal knowledge, compound. 10:57:36
9 MR. BRILLE: Objection. Form. Lack of 10:57:38
10 foundation. 10:57:42
11 Go ahead. 10:57:42
12 A Not that I remember. 10:57:43
13 Q Did you consult with anybody at the State 10:57:47
14 Department or did the -- Secretary Clinton consult 10:57:54
15 with anybody at the State Department or anyone on 10:57:57
16 her behalf about the use of the Clintonemail.com 10:58:00
17 accounts for State Department business? 10:58:03
18 MS. WOLVERTON: Objection. Lack of 10:58:08
19 foundation, lack of personal knowledge, compound. 10:58:09
20 MR. BRILLE: Same objections. 10:58:11
21 A I don't remember any conversations like 10:58:13
22 that. 10:58:14

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1 Q Okay. Since the Department of Justice 10:58:14
2 attorney objected to compound, let me break it down. 10:58:18
3 Did you consult with anybody at the State 10:58:21
4 Department about your use of the Clintonemail.com 10:58:24
5 account for State Department business? 10:58:28
6 A I used my State Department e-mail, and 10:58:33
7 that's -- that was my practice. I -- I -- my 10:58:36
8 Clinton e-mail account, as I think I said earlier, 10:58:40
9 wasn't something -- I didn't, you know -- I kept 10:58:43
10 hidden. It was shared with people, people at State 10:58:46
11 used it particularly when State.gov was down. I 10:58:50
12 used it. I assumed it was okay to use it. I wasn't 10:58:55
13 told that I couldn't use it. But my practice was to 10:58:57
14 use my State.gov -- 10:59:00
15 Q Okay. 10:59:02
16 A -- account for my State Department 10:59:03
17 business. And that's what I did. 10:59:05
18 Q Okay. But the question is whether you 10:59:06
19 consulted with anybody at the State Department about 10:59:07
20 your use of the Clintonemail.com system for State 10:59:11
21 Department business. 10:59:15
22 MS. WOLVERTON: Objection. Vague. 10:59:16

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1	A	I shared that e-mail account with people	10:59:18
2		at the State Department. I do not remember a	10:59:20
3		conversation, a specific conversation that I had,	10:59:24
4		no.	10:59:27
5	Q	Do you know if Secretary Clinton or anyone	10:59:27
6		on her behalf consulted or spoke with anybody at the	10:59:31
7		State Department about her use of her	10:59:35
8		Clintonemail.com account for State Department	10:59:39
9		business?	10:59:42
10		MS. WOLVERTON: Objection. Vague.	10:59:43
11	A	I don't know.	10:59:44
12	Q	Do you recall a memo that Secretary	10:59:44
13		Clinton had issued in 2011 to the State Department	10:59:58
14		agency-wide that employees should only use their	11:00:05
15		State Department e-mail accounts for State	11:00:10
16		Department business?	11:00:13
17		MS. WOLVERTON: Objection. Characterizing	11:00:15
18		facts not in evidence.	11:00:17
19		MR. BRILLE: Objection. Foundation.	11:00:18
20		Go ahead.	11:00:19
21	A	I don't remember a memo -- specifically a	11:00:21
22		memo like that, no.	11:00:24

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1	Q	Do you remember any instruction or	11:00:25
2		directive that the Secretary gave to employees at	11:00:26
3		the State Department not to use their personal	11:00:29
4		e-mail accounts for State Department business?	11:00:31
5	A	I don't remember a memo like that, no.	11:00:34
6	Q	No, I didn't ask about a memo. I asked	11:00:35
7		any instructions or directive that the Secretary	11:00:39
8		gave to State Department employees not to use their	11:00:44
9		personal e-mail accounts for State Department	11:00:48
10		business.	11:00:49
11	A	No, I don't.	11:00:50
12	Q	Did you ever discuss with the Secretary	11:00:51
13		the issue of State Department employees using their	11:01:03
14		personal e-mail accounts for State Department	11:01:09
15		business?	11:01:12
16	A	I don't remember.	11:01:14
17	Q	Did you ever discuss that issue with	11:01:15
18		Cheryl Mills?	11:01:20
19	A	I don't recall.	11:01:24
20	Q	Do you know whether Secretary Clinton and	11:01:24
21		Cheryl Mills ever discussed that issue?	11:01:35
22	A	No, I don't.	11:01:41

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1	MS. COTCA: Would you mark this as Exhibit	11:02:06
2	2.	11:02:08
3	(Abedin Deposition Exhibit 2 marked for	11:02:08
4	identification and is attached to the transcript.)	11:02:38
5	Q And, Ms. Abedin, please take time to look	11:02:38
6	through what's been marked as Exhibit 2, and let me	11:02:40
7	know once you've finished reviewing it.	11:02:42
8	A Thank you.	11:02:44
9	Okay.	11:07:38
10	Q Okay. Thank you. You've had a chance to	11:07:38
11	review it?	11:07:40
12	A Yes.	11:07:40
13	Q Okay. Have you seen this document before	11:07:40
14	today?	11:07:45
15	A It -- I -- I believe I did.	11:07:48
16	Q Okay. When did you see it?	11:07:50
17	A When I was reviewing documents with my	11:07:53
18	attorneys.	11:07:55
19	Q Okay. In preparation for today's	11:07:55
20	deposition. Correct?	11:07:59
21	A Correct.	11:08:00
22	Q Okay. So I will just -- and I'll just	11:08:00

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1 summarize what the document appears to be. But -- 11:08:08
2 and tell me if that's -- if you agree that it seems 11:08:12
3 to be an exchange of e-mails relating to a meeting 11:08:15
4 with you in or around December 17, 2010. 11:08:20
5 Is that accurate? 11:08:24
6 MR. BRILLE: Objection to form. 11:08:24
7 Foundation. 11:08:26
8 MS. WOLVERTON: Same objection. 11:08:27
9 A Yes. 11:08:29
10 Q Okay. Thank you. 11:08:29
11 Could you look at Page -- I'd like to 11:08:31
12 start with Page 9 and 10 of the exhibit. And then 11:08:33
13 do you see the last e-mail -- I'll point you to the 11:08:40
14 last e-mail on Page 9, dated December 17, 2010, 11:08:43
15 from, it appears to be Cindy T. Almodovar, to 11:08:51
16 S/ES-IRM-tech. 11:09:01
17 Do you see that? 11:09:01
18 A Yes. 11:09:01
19 Q Okay. Do you recall having a meeting with 11:09:01
20 Cindy Almodovar on December 17, 2010, relate -- to 11:09:12
21 go over mail issues? 11:09:14
22 A I don't remember meeting with Cindy in 11:09:16

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1 that -- on that specific date. But I now can see 11:09:19
2 from the exchange that we -- we did meet. 11:09:24
3 Q Okay. And let's back up a little bit. 11:09:26
4 Who is Cindy Almodovar? 11:09:29
5 A She was at the -- in the tech, the IT tech 11:09:32
6 department. 11:09:35
7 Q And what do you mean by "the IT tech 11:09:35
8 department"? 11:09:38
9 A If we had challenges with our e-mail, 11:09:39
10 Cindy was one of the people who we contacted. 11:09:42
11 Q Okay. At the State Department. Correct? 11:09:44
12 A At State, yes. Yes. 11:09:46
13 Q Thank you. 11:09:47
14 And that's the IRM office for the 11:09:49
15 Executive Secretariat with the designation S/ES-IRM. 11:09:53
16 Is that right? 11:09:58
17 A That's correct. 11:09:59
18 Q Okay. Thank you. 11:09:59
19 Can you tell me what the substance of the 11:10:03
20 meeting was? 11:10:06
21 A It appears from this document that we had 11:10:09
22 e-mails going -- there were e-mails being sent from 11:10:13

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1 the Clintonemail.com e-mail addresses to State that 11:10:16
2 were not being received. 11:10:21
3 Q Okay. And that was -- Secretary Clinton 11:10:23
4 was having that issue with her e-mail? 11:10:27
5 A It appears as though I was having that 11:10:30
6 issue, as well. 11:10:32
7 Q Okay. So both you and the Secretary. 11:10:33
8 Correct? 11:10:36
9 A Yes. 11:10:36
10 Q Okay. Do you know Ms. Almodovar's 11:10:36
11 position with S/ES-IRM within the State Department 11:10:41
12 at that time? 11:10:46
13 A It -- from this e-mail says -- bless 11:10:46
14 you -- she is the supervisory systems administrator, 11:10:50
15 IRM POEMS help desk. 11:10:53
16 Q Okay. Did you often interact with 11:10:55
17 Ms. Almodovar? 11:10:57
18 A I don't know how often I interacted with 11:11:00
19 her, but I knew -- the name is familiar, and I -- 11:11:02
20 I've -- I'm sure I -- I mean, I clearly did 11:11:04
21 communicate with her. But the name is familiar, 11:11:07
22 yes. 11:11:09

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1 Q Okay. And can you just sort of 11:11:09
2 describe -- you told her about the issues, and what 11:11:13
3 else did you talk about? 11:11:16

4 A I don't remember the meeting, so I 11:11:18
5 couldn't tell you what the specifics in the meeting. 11:11:19

6 I think they're reflected in this -- in 11:11:22
7 this -- in this document. But I think it suggests 11:11:25
8 that we were having communication challenges between 11:11:29
9 the two e-mail accounts. 11:11:31

10 Q Okay. And this is communication 11:11:32
11 challenges between the two e-mail accounts for you 11:11:34
12 and Secretary Clinton at the Clintonemail.com to 11:11:37
13 State Department e-mail accounts. Correct? 11:11:40

14 MR. BRILLE: Objection. Foundation. 11:11:43

15 MS. WOLVERTON: Same objection. 11:11:47

16 A Yes. I mean, it appears as though it was 11:11:51
17 both. It was not just Clinton e-mail. There is a 11:11:53
18 House.gov e-mail account listed here, as well. And 11:11:56
19 that e-mail also did not get through to the 11:12:00
20 State.gov e-mail system. 11:12:03

21 It was -- it was both Clinton e-mail and 11:12:09
22 State.gov having the communications challenges. 11:12:12

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1 Q And what I read at the bottom of the 11:12:14
2 e-mail, on Page 9 -- and I know it's a little bit 11:12:30
3 difficult to read, but I think it says, "I have a 11:12:34
4 contact for the @Clinton e-mail site. His name is 11:12:38
5 Bryan Pagliano, and he actually now works for State. 11:12:43
6 But he apparently set all of this up." 11:12:48
7 Do you see that? 11:12:50
8 A I do. 11:12:51
9 Q Okay. Did you inform Ms. Almodovar 11:12:52
10 about -- that Mr. Pagliano was the contact, and that 11:12:56
11 he set the whole system up? 11:12:58
12 MR. BRILLE: Objection. Foundation. 11:13:01
13 MS. WOLVERTON: Same objection. 11:13:02
14 A I don't know that that's information I 11:13:03
15 would have given her. 11:13:05
16 Q Okay. Do you recall the e-mail -- the 11:13:05
17 meeting that you had with Ms. Almodovar? 11:13:09
18 MR. BRILLE: Objection. Asked and 11:13:12
19 answered. 11:13:12
20 A I didn't remember this meeting at all 11:13:13
21 until I was shown this document. 11:13:14
22 Q Okay. And does the document refresh your 11:13:15

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1 recollection about the meeting? 11:13:17

2 A It -- it -- it does not. 11:13:19

3 Q Okay. Do you know who else from the 11:13:22

4 S/ES-IRM office was in the meeting that you had with 11:13:38

5 Cindy Almodovar? 11:13:47

6 A I don't know. None of these -- none of 11:13:48

7 the other names that are on this document are names 11:13:51

8 that I recognize. 11:13:54

9 Q Okay. Except for Ms. Almodovar? 11:13:55

10 A I do know Cindy, yes. 11:13:58

11 Q Okay. How about John Bentel; was he part 11:14:02

12 of the meeting you had with Ms. Almodovar? 11:14:06

13 MR. BRILLE: Objection. 11:14:10

14 A Is -- 11:14:12

15 MR. BRILLE: Form. 11:14:12

16 A I don't know. I don't -- I don't -- I 11:14:13

17 don't remember meeting with Cindy about this, as I 11:14:16

18 had said earlier. There were often -- there were 11:14:20

19 occasions where there were technical issues. It 11:14:22

20 appears this was in one of those -- one of those 11:14:25

21 moments where we had technical issues and I met with 11:14:28

22 somebody about it. 11:14:30

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1 Q Okay. Were there other occasions when you 11:14:31
2 met with somebody about technical issues with the 11:14:35
3 Clintonemail.com system from the IRM office for the 11:14:37
4 Executive Secretariat? 11:14:41

5 A I don't remember. There were occasions 11:14:43
6 where we had technical challenges, and I reached out 11:14:44
7 to whoever I thought could help. 11:14:46

8 Q Okay. Other -- other than Cindy 11:14:48
9 Almodovar, do you recall any other individuals in 11:14:53
10 the IRM office for the Executive Secretariat who you 11:14:57
11 exchanged or discussed e-mail issues for the 11:15:00
12 Clintonemail.com system? 11:15:05

13 A I don't remember, no. 11:15:07

14 Q Okay. Was she your contact person in that 11:15:08
15 office? 11:15:14

16 A I -- I -- I would have called the help 11:15:14
17 desk, and they would have had somebody respond. 11:15:16
18 They were always very responsive. 11:15:20

19 Cindy perhaps was the person they had 11:15:24
20 identified as the person who could help me and who I 11:15:27
21 met with for this particular issue. 11:15:30

22 Q Okay. Did you meet with Cindy Almodovar 11:15:32

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1 at any other time? 11:15:34

2 A I don't remember. 11:15:36

3 Q Okay. 11:15:36

4 A I know the name. I don't remember. 11:15:37

5 Q Okay. Do you recall how the issue was -- 11:15:39

6 was resolved? 11:15:48

7 A I -- I think -- I can't explain -- a lot 11:15:57

8 of what exchanges they sent I actually don't 11:16:04

9 understand, reading through -- through that, through 11:16:06

10 these e-mail exchanges they had amongst themselves 11:16:10

11 that I am not on. 11:16:13

12 They clearly took some actions that 11:16:15

13 made -- made our e-mails actually go through. 11:16:18

14 Q Okay. Did the issue resolve with the 11:16:23

15 Clinton e-mails actually being able to go through to 11:16:27

16 the State Department e-mail accounts? 11:16:31

17 MR. BRILLE: Objection. Foundation. 11:16:34

18 A Well, and also to a house account. 11:16:35

19 Q Okay. I'm just concerned about the issues 11:16:38

20 with respect to communications from the Secretary 11:16:41

21 and you on your Clintonemail.com accounts to State 11:16:46

22 Department addresses, or accounts. 11:16:51

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1 Did that issue ultimately get resolved? 11:16:53

2 A I don't know that it was permanently 11:16:57

3 resolved. This -- there were -- there was more than 11:16:59

4 one occasion when we were having challenges with 11:17:02

5 State e-mails going through to external e-mails, 11:17:04

6 whether it was Clinton e-mail or a mail dot 11:17:09

7 House.gov and vice versa. 11:17:12

8 So this was not the only occasion where we 11:17:15

9 had challenges, where somebody said, I sent an 11:17:17

10 e-mail and it didn't go through or not. 11:17:19

11 Q Okay. But as far as you recall, shortly 11:17:21

12 after the December 17, 2010, meeting -- 11:17:27

13 A Yeah. 11:17:31

14 Q -- that you had with Ms. Almodovar, was 11:17:31

15 that ultimately resolved? 11:17:35

16 MR. BRILLE: Objection. Foundation. 11:17:39

17 A It likely was until we had the next issue, 11:17:42

18 yeah. 11:17:45

19 Q Okay. 11:17:45

20 A That's a -- fair to say. 11:17:46

21 Q Okay. And then when it was resolved, were 11:17:49

22 you at all informed as to how the issue was 11:17:51

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1	resolved?	11:17:53
2	MR. BRILLE: Same objection.	11:17:55
3	MS. WOLVERTON: Objection. Lack of	11:17:56
4	foundation.	11:17:57
5	A I don't remember, but they were always	11:17:58
6	very responsive.	11:18:00
7	Q Okay. And when you say "they" were very	11:18:01
8	responsive, who do you -- who is the "they"?	11:18:03
9	A The help desk at State.	11:18:07
10	Q And the help desk at State, is that the	11:18:08
11	desk within the IRM office for the Executive	11:18:10
12	Secretariat?	11:18:15
13	A I -- I don't know where they sit. It was	11:18:15
14	a phone number for me. It was usually I picked up	11:18:19
15	the phone and you called help desk and they usually	11:18:21
16	sent somebody to us. They usually came and met in	11:18:25
17	our office. I'm -- I'm not sure I actually ever	11:18:27
18	walked over there. But, yes.	11:18:29
19	Q Was it POEMS?	11:18:30
20	MR. BRILLE: Objection. Form.	11:18:38
21	A Was who I called POEMS?	11:18:41
22	Q Right.	11:18:43

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1 A It was a five-digit number that -- it 11:18:43
2 could -- it could -- it could have -- it could have 11:18:46
3 been POEMS. It was there's a five-digit number. 11:18:49
4 And when we had technical issues you called that 11:18:51
5 number. 11:18:54
6 I experienced it as the help desk. I had 11:18:54
7 problems, call that number, they send somebody to my 11:18:56
8 office, how can we help. And they were always 11:18:58
9 extremely efficient and very responsive. 11:19:00
10 Q Okay. And in connection to that meeting 11:19:03
11 and the issues that you and the Secretary were 11:19:07
12 having with the Clinton e-mail -- 11:19:10
13 A Yeah. 11:19:11
14 Q -- dot com accounts -- 11:19:12
15 A Yeah. 11:19:14
16 Q -- do you recall any conversations or any 11:19:14
17 exchanges with Bryan Pagliano about that? 11:19:17
18 A As I think I mentioned earlier, there 11:19:21
19 were -- there were occasions where I communicated 11:19:23
20 with Bryan when I was having technical issues. I 11:19:25
21 don't remember specific time periods. But there -- 11:19:29
22 there were incidents -- incidents -- incidences. 11:19:32

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1	MR. BRILLE: Instances.	11:19:37
2	A Instances. Thank you. Instances where I	11:19:39
3	did have to communicate with Bryan. Bryan or	11:19:41
4	Justin, yes.	11:19:44
5	Q Okay. Do you know how Ms. Almodovar --	11:19:44
6	I'm sorry, I'm butchering her last name --	11:19:50
7	Almodovar, how she came to know that Bryan Pagliano	11:19:55
8	set up the system?	11:19:59
9	MS. WOLVERTON: Objection.	11:20:02
10	MR. BRILLE: Objection.	11:20:02
11	MS. WOLVERTON: Lack of foundation,	11:20:03
12	assumes facts not in evidence.	11:20:04
13	MR. BRILLE: Same objection.	11:20:05
14	A I don't know.	11:20:07
15	Q Okay. On Page 4, if you can take a look	11:20:08
16	at the document.	11:20:17
17	And if you can just look at the second	11:20:24
18	full e-mail from, it looks like Trey Jammes to	11:20:26
19	Thomas Lawrence and some other individuals on	11:20:32
20	December 21st, 2010, at 2:39 p.m.	11:20:36
21	Do you see that e-mail?	11:20:40
22	A I do.	11:20:41

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1	Q	Okay. Do you know who Trey Jammes is?	11:20:42
2	A	I don't.	11:20:47
3	Q	Does that name sound familiar to you at	11:20:48
4		all?	11:20:52
5	A	It does not.	11:20:52
6	Q	Okay. How about Thomas Lawrence?	11:20:53
7	A	No.	11:20:57
8	Q	And I'm just going to go through all the	11:20:58
9		individuals --	11:21:01
10	A	Sure.	11:21:02
11	Q	-- in the e-mail.	11:21:02
12		Kenneth LaVolpe. Do you know who Kenneth	11:21:04
13		LaVolpe was?	11:21:09
14	A	No.	11:21:11
15	Q	Or is.	11:21:11
16		How about Jay Gazlay?	11:21:14
17	A	No.	11:21:16
18	Q	What about Ebenezer Mensah?	11:21:16
19	A	No.	11:21:18
20	Q	And Nancy Wilson. Do you know who Nancy	11:21:19
21		Wilson is?	11:21:23
22	A	No.	11:21:23

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1 Q So as far as you recall, you did not 11:21:23
2 exchange -- or you did not communicate with them in 11:21:38
3 relation to the e-mail issues that you and the 11:21:41
4 Secretary were experiencing. 11:21:46

5 MR. BRILLE: Objection. Vague. 11:21:50

6 A It appears as though Cindy was my -- my -- 11:21:53
7 my point of contact, from looking at the exchange. 11:21:55

8 Q Okay. 11:21:57

9 A And she is likely the person I was -- I 11:21:58
10 was communicating with. 11:22:03

11 But, again, when you called the help desk, 11:22:04
12 there was -- there were different people who 11:22:07
13 answered the phone, depending on the day that it 11:22:09
14 was. 11:22:12

15 Q Okay. Thank you. 11:22:12

16 MS. COTCA: Can we mark that as Exhibit 3. 11:22:47

17 (Abedin Deposition Exhibit 3 marked for 11:22:49
18 identification and is attached to the transcript.) 11:22:53

19 Q And just to finish the subject matter 11:22:53
20 up -- 11:22:54

21 A Okay. 11:22:54

22 Q -- I'm going to have you look at another 11:22:54

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1	document.	11:22:56
2	A Okay.	11:22:56
3	Q Please take your time looking through the	11:23:21
4	document.	11:23:23
5	A Thank you.	11:23:23
6	Q Oh, ready?	11:24:08
7	A I have read it, yes.	11:24:09
8	Q Thank you.	11:24:10
9	A Yes.	11:24:11
10	Q Have you seen -- Exhibit 3 looks like it's	11:24:12
11	a string of e-mails regarding the Secretary's e-mail	11:24:17
12	account and your e-mail account in or around January	11:24:22
13	9th and 10th of 2011.	11:24:26
14	MR. BRILLE: Object to form. Foundation.	11:24:30
15	MS. WOLVERTON: Same objection. The	11:24:33
16	document speaks for itself.	11:24:35
17	Q Okay. Do you agree with that summary?	11:24:37
18	MR. BRILLE: Same objection.	11:24:38
19	MS. WOLVERTON: Same objection.	11:24:39
20	MR. BRILLE: Sorry. Same objection.	11:24:40
21	A Yes.	11:24:42
22	Q Okay. Thank you.	11:24:42

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1	Do you -- have you seen these e-mails	11:24:45
2	prior to today?	11:24:47
3	A Yes.	11:24:48
4	Q Okay. And when did you see the e-mails?	11:24:48
5	A When I was reviewing documents with my	11:24:53
6	attorneys.	11:24:55
7	Q Okay. And that was in preparation for	11:24:55
8	today's deposition. Correct?	11:24:57
9	A Correct.	11:24:58
10	Q Okay. Thank you.	11:24:58
11	Do you recall there being an issue with	11:25:10
12	the server for the Clintonemail.com system being	11:25:12
13	attacked, as Justin Cooper said on the second page	11:25:18
14	of the exhibit?	11:25:22
15	MS. WOLVERTON: Objection. Vague.	11:25:24
16	MR. BRILLE: Same objection.	11:25:25
17	A I didn't remember until I -- I saw the --	11:25:26
18	these e-mails reminding me.	11:25:30
19	Q Okay. And do you -- did the documents and	11:25:32
20	the e-mails refresh your recollection about the	11:25:34
21	issue with the server at that time?	11:25:36
22	A Yes.	11:25:38

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1	Q	Okay. And can you tell me what you recall	11:25:39
2		about the issue with the server?	11:25:41
3	A	Just really what's exchanged in this	11:25:43
4		e-mail. Justin saying, I think from -- for my	11:25:45
5		experience, my e-mail wasn't working. I reached out	11:25:50
6		to Justin. He said he was dealing with some	11:25:52
7		technical -- in this case he suggested what --	11:25:54
8		somebody was trying to get in -- hack us, I'm	11:25:59
9		quoting Justin. And for my purposes it was a matter	11:26:02
10		of my e-mails not coming through for a while, and	11:26:06
11		then from my memory it restored pretty quickly.	11:26:10
12	Q	Okay. When you say your e-mails weren't	11:26:13
13		coming through, is that your e-mails to your	11:26:15
14		Clintonemail.com account?	11:26:19
15	A	Yes.	11:26:20
16	Q	Thank you.	11:26:21
17		Who is Doug Band?	11:26:27
18	A	Doug Band used to work for President	11:26:28
19		Clinton.	11:26:30
20	Q	Okay. And when did he -- when did his	11:26:30
21		employment for President Clinton terminate?	11:26:36
22	A	Sometime in the last few years.	11:26:38

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1 Q Okay. And what did he do for President 11:26:42
2 Clinton? 11:26:42
3 A He -- 11:26:44
4 MS. WOLVERTON: Objection. 11:26:44
5 Q Employment-wise? 11:26:44
6 THE WITNESS: I'm sorry. 11:26:46
7 MS. WOLVERTON: Objection. Beyond the 11:26:46
8 scope of the authorized discovery. 11:26:47
9 MR. BRILLE: Same objection. 11:26:48
10 A He was President Clinton's senior advisor, 11:26:49
11 chief of staff, in the period after he left the 11:26:55
12 White House. 11:26:58
13 Q Okay. Do you know whether he was involved 11:26:58
14 in any way with dealing issues with the Clinton 11:27:06
15 server? 11:27:11
16 A Not that I'm aware of. 11:27:12
17 Q Do you know why he is cc'd on the e-mail 11:27:13
18 of the second page of this document on -- or not 11:27:19
19 cc'd, I'm sorry. Why Justin Cooper included him on 11:27:22
20 the e-mail to you on January 9, 2011? 11:27:27
21 A Aside from the fact that he was probably 11:27:39
22 informing Doug as well about the issue. Doug was 11:27:40

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1	somebody who worked with Justin in President	11:27:44
2	Clinton's office.	11:27:47
3	Q Okay.	11:27:48
4	A So he -- he was making us aware of what	11:27:49
5	was happening.	11:27:53
6	Q Okay. As far as you know, did you --	11:27:53
7	well, strike that.	11:27:56
8	Did you ever contact Doug Band when you	11:27:56
9	ever had issues with the Clintonemail.com account?	11:27:59
10	A I don't remember contacting Doug. He --	11:28:07
11	he was somebody I -- he was a very close colleague	11:28:09
12	of mine. And we talked all the time and	11:28:12
13	communicated all the time. I don't remember Doug	11:28:13
14	being a person I would go to on technical issues.	11:28:16
15	Q Okay. Do you know if the Secretary ever	11:28:19
16	contacted Doug Band when she encountered issues with	11:28:21
17	her Clintonemail.com?	11:28:25
18	A Not that I'm aware of.	11:28:28
19	Q Okay. And do you know whether Doug Band	11:28:32
20	provided any technical support or services for the	11:28:34
21	Clintonemail.com accounts during your tenure at the	11:28:41
22	State Department?	11:28:46

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1	A	No, I don't believe so.	11:28:46
2	Q	You don't believe he provided the --	11:28:47
3	A	Not from my perspective. Not from my	11:28:53
4		understanding. It's not something that Doug	11:28:55
5		would -- would do or would be -- I certainly would	11:28:58
6		not ask him to.	11:29:00
7	Q	Okay. Thank you. Fair.	11:29:01
8		And then the last page of the exhibit?	11:29:04
9	A	Yes.	11:29:05
10	Q	That's an e-mail from you, it looks like	11:29:06
11		to Jacob Sullivan and Cheryl Mills on January 10,	11:29:11
12		2011.	11:29:15
13		Do you see that?	11:29:17
14	A	Yes, I do.	11:29:18
15	Q	Okay. Do you recall that e-mail?	11:29:18
16	A	I -- again, my memory is jogged, has been	11:29:23
17		jogged by looking at these documents. But --	11:29:25
18	Q	Okay.	11:29:28
19	A	Yes, I do.	11:29:29
20	Q	Okay. And after you've reviewed these	11:29:30
21		documents, what do you recall about the e-mail	11:29:32
22		exchange between you and Jacob Sullivan and Cheryl	11:29:35

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1	Mills on January 10, 2011?	11:29:38
2	A Since the e-mail -- my e-mail to my	11:29:42
3	colleagues at State was probably not knowing how	11:29:47
4	Justin was resolving this issue, just informing them	11:29:50
5	that she -- she wasn't going to have access to	11:29:54
6	e-mail. I just sent them this message so she -- I	11:29:58
7	could explain by the phone, or in person, as I say	11:30:01
8	here.	11:30:04
9	Q And that's my followup question.	11:30:04
10	A Yeah.	11:30:06
11	Q Where you write, "Don't e-mail HRC	11:30:06
12	anything sensitive," HRC refers to Secretary	11:30:09
13	Clinton. Is that right?	11:30:12
14	A Yes.	11:30:13
15	Q Okay. And then you write, "I can explain	11:30:14
16	more in person."	11:30:17
17	A Yes.	11:30:17
18	Q What did you explain to Ms. Mills and	11:30:18
19	Mr. Sullivan?	11:30:20
20	MS. WOLVERTON: Objection. Assumes facts	11:30:21
21	not in evidence.	11:30:23
22	MR. BRILLE: Objection.	11:30:26

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1 You can answer, to the extent you recall. 11:30:27

2 A I -- I don't remember exactly the words 11:30:29

3 that I used. But looking at this e-mail chain, I 11:30:31

4 would have informed them in person what Justin had 11:30:34

5 told me by e-mail. 11:30:36

6 Q That the server was hacked? 11:30:38

7 MR. BRILLE: Objection. Foundation. 11:30:43

8 Form. 11:30:45

9 A I don't believe that's what his e-mail 11:30:46

10 said. 11:30:47

11 Q Well, I'm sorry, but I thought you 11:30:48

12 testified that you reviewed the document -- 11:30:50

13 A Yes. 11:30:53

14 Q -- and the documents have refreshed your 11:30:53

15 recollection. 11:30:54

16 A Yes. Yes. Yes. 11:30:54

17 Q Okay. 11:30:56

18 A No. He says someone was -- 11:30:56

19 MR. BRILLE: Wait. Wait. Wait. There is 11:30:58

20 no question pending right now. 11:30:59

21 So you go ahead and ask your question and 11:31:01

22 let me object. 11:31:03

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1	Give me a second to --	11:31:04
2	MS. COTCA: If it's objectionable. But,	11:31:08
3	sure.	11:31:10
4	Q After you reviewed the documents and your	11:31:11
5	memory has been refreshed with respect to this	11:31:15
6	e-mail exchange on January 9 and January 10, 2011 --	11:31:19
7	A Yes.	11:31:24
8	Q -- what do you recall about the	11:31:24
9	explanation that you provided to Ms. Mills and	11:31:28
10	Mr. Sullivan?	11:31:31
11	MS. WOLVERTON: Objection. Assumes facts	11:31:33
12	not in evidence.	11:31:34
13	MR. BRILLE: Same objection.	11:31:35
14	Go ahead.	11:31:36
15	A I wouldn't be able to recall the	11:31:38
16	conversation exactly. But having seen this chain,	11:31:40
17	what I would have said is, Justin e-mailed me to	11:31:43
18	tell me that someone was trying to hack the system,	11:31:47
19	and I would have told them that. I would have told	11:31:53
20	them that in person.	11:31:55
21	Q Okay. And do you recall when the issue	11:31:56
22	was resolved with the server?	11:32:03

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1	MR. BRILLE: Objection. Vague.	11:32:06
2	A I don't.	11:32:08
3	Q Okay. Do you recall when you were able to	11:32:09
4	use your Clintonemail.com after this e-mail	11:32:12
5	exchange?	11:32:16
6	A I -- I couldn't give you a specific amount	11:32:16
7	of time. But I -- my Clinton e-mail was restored,	11:32:18
8	and I was able to -- to be back on it. This was a	11:32:22
9	matter of just being able to use the address.	11:32:25
10	Q Okay. You can put that aside. Thank you.	11:32:29
11	I would like to switch gears a little bit.	11:32:51
12	A Okay.	11:32:53
13	Q When you started at the State Department,	11:32:53
14	were you provided any training or guidance with	11:32:55
15	respect to the Freedom of Information Act? And I	11:32:57
16	will shorten that by referring to it as FOIA.	11:33:02
17	A I -- I don't remember a specific FOIA	11:33:08
18	briefing or training. But there were many	11:33:10
19	transition trainings that took place when we first	11:33:13
20	arrived at -- when we first arrived at the State	11:33:16
21	Department.	11:33:19
22	Q Okay. Do you recall being provided any	11:33:19

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1 manuals that dealt with FOIA when you started your 11:33:23
2 tenure at the State Department? 11:33:30
3 A I may have been provided. I don't 11:33:31
4 remember the manuals, but I may have -- I may have 11:33:33
5 been as part of the transition. 11:33:35
6 Q Is that manual something that you would 11:33:36
7 have read and reviewed -- 11:33:40
8 MR. BRILLE: Objection. 11:33:42
9 Q -- upon having been provided the manual? 11:33:43
10 MR. BRILLE: Objection. Form. 11:33:47
11 Foundation. 11:33:49
12 MS. WOLVERTON: Same objections. 11:33:50
13 A I don't remember if I read the manual. 11:33:51
14 But I generally -- my practice was, as I was 11:33:52
15 receiving materials -- and there was a lot of 11:33:56
16 materials we received when we arrived at the State 11:33:57
17 Department -- was to -- was to review the documents 11:34:00
18 that was provided to us. 11:34:04
19 Q Okay. And the manual -- the manuals that 11:34:05
20 were provided to you when you started at the State 11:34:10
21 Department, is that something -- are those manuals 11:34:13
22 also would have been provided to everybody within 11:34:15

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1	the Secretary's office?	11:34:17
2	MS. WOLVERTON: Objection. Lack of	11:34:19
3	foundation, lack of personal knowledge.	11:34:21
4	MR. BRILLE: Same objection.	11:34:22
5	A I don't know what other people -- I don't	11:34:24
6	know what other colleagues of mine may -- may have	11:34:26
7	received.	11:34:29
8	Q Okay. Do you know whether Secretary	11:34:30
9	Clinton received any guidance or if anybody	11:34:40
10	consulted with her about FOIA upon her entering her	11:34:42
11	tenure at the State Department?	11:34:46
12	MR. BRILLE: Objection. Form.	11:34:47
13	MS. WOLVERTON: Same objection.	11:34:48
14	A I don't know. I wasn't in all briefings	11:34:51
15	with her.	11:34:53
16	Q Okay. Did you receive any briefing, that	11:34:54
17	you recall, upon entering your tenure at the State	11:34:59
18	Department, about FOIA?	11:35:03
19	A As I mentioned earlier, I remember	11:35:06
20	receiving many briefings during the transition	11:35:08
21	period when we arrived at State. It was days of --	11:35:10
22	of briefings on various departments. And I -- I do	11:35:16

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1	not remember a specific FOIA briefing.	11:35:19
2	Q Okay. Are you familiar with FOIA?	11:35:23
3	A Yes.	11:35:25
4	Q Okay. And during your tenure at the State	11:35:25
5	Department, were you aware that federal records	11:35:29
6	belonged to the agency?	11:35:32
7	MS. WOLVERTON: Objection. Beyond the	11:35:34
8	scope of discovery, calls for a legal conclusion.	11:35:36
9	MR. BRILLE: Same objection.	11:35:40
10	You can answer.	11:35:42
11	A Yes.	11:35:43
12	Q Okay. And during your tenure at the State	11:35:43
13	Department, were you aware of your obligation not to	11:35:50
14	delete federal records or destroy federal records?	11:35:52
15	MS. WOLVERTON: Objection. Beyond the	11:35:55
16	scope of discovery, and calls for a legal	11:35:57
17	conclusion.	11:36:00
18	MR. BRILLE: And lacks foundation.	11:36:00
19	A Can you ask me that question again?	11:36:06
20	MS. COTCA: Could you read that back.	11:36:07
21	(Pending question read.)	11:36:18
22	MS. WOLVERTON: Same objections.	11:36:20

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1 MR. BRILLE: Same objections. 11:36:20

2 A I'm not sure that question is clear. 11:36:21

3 Q What don't you understand about the 11:36:26

4 question? 11:36:28

5 A Well, if there was a schedule that was 11:36:28

6 created that was her Secretary of State daily 11:36:30

7 schedule, and a copy of that was then put in the 11:36:34

8 burn bag, that -- that certainly happened on -- on 11:36:38

9 more than one occasion. 11:36:42

10 Q Okay. Let's focus on e-mail 11:36:43

11 communications for State Department business. 11:36:49

12 A Okay. Okay. 11:36:51

13 Q Okay. Were you aware, during your tenure 11:36:52

14 at the State Department, that you had an obligation 11:36:55

15 to preserve those e-mails? 11:36:57

16 MS. WOLVERTON: Objection. Calls for a 11:37:00

17 legal conclusion. 11:37:02

18 A The e-mails on my State Department system 11:37:03

19 existed on my computer, and I -- I didn't have a 11:37:07

20 practice of managing my mailbox other than leaving 11:37:11

21 what was in there sitting in there. 11:37:15

22 So for my BlackBerry, if I exceeded the -- 11:37:17

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1 the limit, I think it -- it auto deleted. But, no, 11:37:21
2 I didn't -- it wasn't my -- I didn't -- I didn't 11:37:25
3 have a -- I didn't go into my e-mails and -- and 11:37:28
4 delete State.gov e-mails. They just lived on my 11:37:35
5 computer. 11:37:38

6 Q Okay. The question is not just limited to 11:37:38
7 State.gov e-mails; it's in connection to all of your 11:37:42
8 e-mails for State Department business. 11:37:46

9 A That was my practice for all my e-mail 11:37:50
10 accounts. I -- I -- I didn't -- I didn't have a 11:37:52
11 particular form of organizing them. I had a few 11:37:57
12 folders, but they were not deleted. They all stayed 11:38:00
13 in whatever device I was using at the time or 11:38:03
14 whatever desktop I was on at the time. 11:38:06

15 Q Okay. When -- to clarify for the record, 11:38:08
16 when you say you had a few folders set up -- 11:38:11

17 A Yeah. 11:38:14

18 Q -- is that on your e-mail account, or are 11:38:14
19 these physical folders that you had set up? 11:38:16

20 MS. WOLVERTON: Objection. Extends beyond 11:38:19
21 the scope of discovery. 11:38:21

22 MR. BRILLE: Same objection. 11:38:22

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1	A	It would have been folders on my Outlook	11:38:23
2		account on the -- on the -- my State Department	11:38:26
3		computer.	11:38:28
4	Q	Okay. Could you access your	11:38:28
5		Clintonemail.com e-mail on your desktop at the State	11:38:31
6		Department?	11:38:34
7	A	Yes.	11:38:34
8	Q	And did you access your Clinton e-mail --	11:38:34
9	A	Yes.	11:38:37
10	Q	-- dot com?	11:38:37
11	A	Yes, I did.	11:38:40
12	Q	Did you do that for State Department	11:38:40
13		business?	11:38:45
14		MR. BRILLE: Objection to form.	11:38:46
15	A	I did that when I was working or	11:38:47
16		responding to e-mails that came in. I couldn't	11:38:52
17		check my Clinton BlackBerry, so it was the only -- I	11:38:54
18		didn't have access to my Clinton e-mail BlackBerry	11:38:56
19		when I was in the office, so it was the only way I	11:38:58
20		could check my Clinton e-mails.	11:39:01
21	Q	How did you access your Clintonemail.com	11:39:03
22		account off your desktop?	11:39:11

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1	A	It was just a -- it was a fairly simple	11:39:13
2		login system. It was through a web browser.	11:39:16
3	Q	Okay. Was it connected to your Outlook?	11:39:19
4	A	No. No.	11:39:22
5	Q	Okay.	11:39:23
6	A	It was just Safari or ...	11:39:23
7	Q	Okay. During your tenure at the State	11:39:26
8		Department, were you aware of your obligations to	11:39:34
9		search your e-mails for State-related business under	11:39:37
10		FOIA?	11:39:45
11		MS. WOLVERTON: Objection. Calls for a	11:39:46
12		legal conclusion, lack of foundation.	11:39:47
13		MR. BRILLE: Objection. Lack of	11:39:49
14		foundation.	11:39:50
15	A	It -- it was never any -- it was never a	11:39:52
16		matter that was raised with me. I was never asked	11:39:55
17		to search my e-mails for anything related to FOIA	11:39:57
18		when I was at State, that I ...	11:39:59
19	Q	Okay. I guess that's my question. Did	11:40:02
20		you ever search your State.gov account for any	11:40:10
21		e-mails in response to a FOIA request or litigation?	11:40:13
22	A	No, I did not.	11:40:16

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1	Q	Okay. Did you ever search -- were you	11:40:17
2		ever asked to search your State.gov e-mail account	11:40:19
3		in response to a FOIA request or FOIA litigation?	11:40:22
4	MS. WOLVERTON:	Objection. Asked and	11:40:26
5		answered.	11:40:27
6	MR. BRILLE:	Objection.	11:40:28
7	A	I believe I said no.	11:40:30
8	Q	No, it's a different question. But the	11:40:31
9		answer is still no?	11:40:33
10	A	No. It is, yeah.	11:40:34
11	Q	Thank you.	11:40:38
12		Did you ever search your Clintonemail.com	11:40:39
13		account for -- in response to a FOIA request or FOIA	11:40:43
14		litigation during your tenure at the State	11:40:48
15		Department?	11:40:52
16	A	No, I did not.	11:40:52
17	Q	Okay. Were you ever asked to search your	11:40:53
18		Clintonemail.com account during your tenure at the	11:40:56
19		State Department in response to a FOIA request or	11:41:02
20		FOIA litigation?	11:41:05
21	A	No, I was not.	11:41:06
22	Q	Okay. Do you know if anybody else	11:41:07

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1	searched your account for you -- this is your	11:41:13
2	State.gov account -- in response to a FOIA request	11:41:17
3	or FOIA litigation during your tenure there?	11:41:20
4	A Not that I'm aware of.	11:41:23
5	Q Okay. Are you aware if anybody else	11:41:23
6	searched your Clintonemail.com account during your	11:41:29
7	tenure at the State Department in response to a FOIA	11:41:32
8	request or FOIA litigation?	11:41:34
9	A Not that I'm aware of.	11:41:36
10	Q Are you aware of any FOIA requests that	11:41:37
11	were sent or received to the Secretary's office	11:42:04
12	during your tenure at the State Department?	11:42:07
13	MS. WOLVERTON: Objection. The question	11:42:09
14	extends beyond the scope of the authorized	11:42:10
15	discovery.	11:42:12
16	MR. BRILLE: Same objection.	11:42:15
17	A I don't remember any such instances.	11:42:19
18	Q Do you know how FOIA requests were	11:42:20
19	processed in the Secretary's office during your	11:42:29
20	time -- tenure at the Department of State?	11:42:33
21	A No, I am not aware.	11:42:34
22	Q Did you ever discuss any FOIA requests	11:42:35

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1	with anybody in the Secretary's office during your	11:42:42
2	tenure there?	11:42:45
3	A I don't have any memory of -- of doing so.	11:42:46
4	Q Okay. How about FOIA in general; do you	11:42:49
5	recall any discussions that you may have had either	11:42:53
6	with Cheryl Mills, Secretary Clinton, or anybody	11:42:54
7	else in the Secretary's office, about FOIA?	11:42:57
8	A It wasn't anything that I remember having	11:43:02
9	discussions about.	11:43:04
10	Q And you knew Clarence Finney during --	11:43:06
11	during your tenure at the State Department. Right?	11:43:15
12	A Yes, I did.	11:43:15
13	Q Okay. And did you ever discuss FOIA with	11:43:16
14	Mr. Finney during your tenure at the State	11:43:18
15	Department?	11:43:20
16	A I don't -- I don't remember any specific	11:43:24
17	conversations with Clarence. I -- I remember	11:43:26
18	briefing with Clarence when he first arrived about	11:43:28
19	the documents that we were able to bring in with us.	11:43:30
20	But I don't remember having a conversation like that	11:43:32
21	with Clarence.	11:43:35
22	Q Okay. During your tenure at the State	11:43:36

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1	Department, did you know that your e-mails relating	11:43:42
2	to State Department business were subject to FOIA?	11:43:48
3	MS. WOLVERTON: Objection. Assumes facts	11:43:52
4	not in evidence, calls for legal conclusion.	11:43:55
5	MR. BRILLE: I'll just say an objection,	11:43:59
6	foundation.	11:44:00
7	You can answer.	11:44:00
8	A Yes.	11:44:01
9	Q Okay. And when you were at the State	11:44:01
10	Department, did you know that your e-mails relating	11:44:09
11	to State Department business on your	11:44:12
12	Clintonemail.com account were also subject to FOIA?	11:44:15
13	MS. WOLVERTON: Objection. Calls for a	11:44:20
14	legal conclusion.	11:44:22
15	MR. BRILLE: Same objection.	11:44:23
16	A I -- yes.	11:44:24
17	Q All right. Did Secretary Clinton know, as	11:44:26
18	far as you're aware, that her e-mails relating to	11:44:32
19	State Department business on her Clintonemail.com	11:44:37
20	account were subject to FOIA?	11:44:41
21	MS. WOLVERTON: Objection. Lack of	11:44:43
22	foundation, calls for a legal conclusion.	11:44:44

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1	MR. BRILLE: Same objection.	11:44:47
2	A I don't. I don't know. You would have to	11:44:49
3	ask her.	11:44:51
4	Q During your tenure at the State	11:44:51
5	Department, in communications and exchanges that you	11:45:16
6	had with Clarence Finney --	11:45:17
7	A Yes.	11:45:18
8	Q -- were there any discussions about how	11:45:18
9	your e-mails relating to State Department business	11:45:22
10	could be accessed on your Clintonemail.com account?	11:45:27
11	A I don't recall having that conversation	11:45:32
12	with Clarence, no.	11:45:33
13	Q Did you inform Mr. Finney that you had	11:45:34
14	State Department-related e-mails on your	11:45:40
15	Clintonemail.com?	11:45:43
16	A As I think I mentioned earlier, I don't	11:45:46
17	remember telling Clarence about Clintonemail.com.	11:45:48
18	Q Do you know why that would have been?	11:45:51
19	MR. BRILLE: Objection to form.	11:45:54
20	MS. WOLVERTON: Same objection.	11:45:56
21	A I --	11:45:57
22	MR. BRILLE: Lacks foundation.	11:45:57

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1 A I used -- I was using my State.gov e-mail 11:45:58
2 for the majority of my State Department business. 11:46:02
3 In many instances it was forwarding a document to be 11:46:05
4 printed, a press clipping, a -- a schedule. So 11:46:08
5 those were all e-mails that were captured in the 11:46:14
6 system. And it was sent to Clinton e-mail. I had 11:46:16
7 forwarded it to Clinton e-mail to print. 11:46:19
8 So I -- my -- my understanding, my 11:46:23
9 practice, from what I -- how I was functioning, I -- 11:46:29
10 I wasn't perfect, but I did the best I could, was 11:46:32
11 putting everything on State.gov. There were 11:46:35
12 documents that were forwarded from State.gov to 11:46:38
13 Clinton e-mail. Those were captured in the system. 11:46:41
14 And so that's -- that is how I operated. And I 11:46:44
15 understood that everything that was on the State.gov 11:46:46
16 system was kept in the system and retained in the 11:46:49
17 system. 11:46:52
18 Q Was the issue about how Secretary 11:46:55
19 Clinton's e-mails could be accessed to respond to 11:46:56
20 FOIA ever discussed by anybody within the 11:47:00
21 Secretary's office? 11:47:04
22 MS. WOLVERTON: Objection. Lack of 11:47:05

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1	personal knowledge, lack of foundation.	11:47:06
2	Q As far as you know.	11:47:08
3	A Not that I'm aware.	11:47:09
4	Q Do you know if that issue was ever	11:47:11
5	considered by anybody within the Secretary's office?	11:47:12
6	MS. WOLVERTON: Objection. Vague.	11:47:19
7	A I don't know.	11:47:20
8	Q Do you know if Secretary Clinton or anyone	11:47:20
9	on her behalf informed Mr. Finney about -- that she	11:47:30
10	had State Department work-related e-mails on her	11:47:40
11	Clintonemail.com account?	11:47:46
12	MS. WOLVERTON: Objection. Asked and	11:47:48
13	answered.	11:47:49
14	MR. BRILLE: Same objection.	11:47:49
15	A Not that -- not that I'm aware of.	11:47:51
16	Q When you used your Clintonemail.com	11:47:53
17	account for State Department-related business, did	11:48:12
18	you ever print and file the e-mails?	11:48:18
19	A No. I don't believe I did.	11:48:22
20	Q Okay. Did you ever save the e-mails	11:48:24
21	either as a PST or a PDF file?	11:48:28
22	A No, I did not.	11:48:32

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1	Q	Why not?	11:48:33
2	A	Honestly, I wish I thought about it at the	11:48:43
3		time. As I said, I wasn't perfect. I tried to do	11:48:45
4		all of my work on State.gov. And I do believe I did	11:48:48
5		the majority of my work on State.gov.	11:48:52
6		And many of the instances where I was on	11:48:56
7		Clinton e-mail, it was because I had forwarded	11:48:59
8		something from a State.gov account into Clinton	11:49:02
9		e-mail, and in other instances from my Clinton	11:49:07
10		e-mail I was communicating with somebody who was on	11:49:09
11		a State.gov account, and it was captured through	11:49:11
12		there.	11:49:14
13		I -- I did the best I could to do	11:49:16
14		everything right. I -- it did not occur to me to	11:49:19
15		print and file.	11:49:21
16	Q	All right. But it is your testimony that	11:49:22
17		there were times that you communicated with	11:49:30
18		Secretary Clinton where both of you used only the	11:49:31
19		Clintonemail.com accounts for State Department	11:49:34
20		business. Right?	11:49:37
21		MR. BRILLE: Objection. Form.	11:49:38
22	A	Yes. There --	11:49:40

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1 MR. BRILLE: Lack of foundation. 11:49:41

2 A Yes. There were instances where that 11:49:43

3 occurred. 11:49:44

4 Q Okay. With respect to those State 11:49:44

5 Department work-related e-mails on the 11:49:48

6 Clintonemail.com accounts, what did you do, if 11:49:49

7 anything, to preserve those e-mails? 11:49:55

8 A I did -- those -- I did not do anything to 11:50:01

9 preserve those e-mails. 11:50:04

10 But again, many of those e-mails were sent 11:50:05

11 from State.gov. The instances where it was 11:50:07

12 Clintonemail to Clintonemail, there were instances 11:50:10

13 where the content of those e-mails had personal 11:50:14

14 matters in there, and there may have also been State 11:50:18

15 Department matters in there, too. It was a -- a 11:50:21

16 combination. 11:50:24

17 But I did not -- I did not preserve those 11:50:25

18 e-mails. 11:50:28

19 Q As far as you know, if you know, what did 11:50:28

20 Secretary Clinton do to ensure that her work-related 11:50:38

21 e-mails were preserved? 11:50:43

22 A She generally e-mailed people on their 11:50:47

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1 State.gov e-mail accounts, and -- and through that 11:50:49
2 manner, those -- those e-mails were captured in the 11:50:55
3 system. 11:50:58

4 Q Okay. Do you know if any of the 11:50:58
5 Secretary's e-mails relating to State Department 11:51:04
6 business were printed and filed on the Secretary's 11:51:06
7 behalf during your tenure at the State Department? 11:51:12

8 A Not that -- 11:51:16

9 MS. WOLVERTON: Objection. Foundation. 11:51:17

10 MR. BRILLE: Go ahead. You can answer. 11:51:19

11 A Not that I'm aware of. 11:51:20

12 Q Do you know how the Secretary managed her 11:51:22
13 Inbox on her Clintonemail.com account during her 11:51:27
14 tenure at the State Department? 11:51:30

15 A No. 11:51:31

16 Q Do you know if Secretary Clinton deleted 11:51:31
17 any of her work-related e-mails -- 11:51:37

18 MS. WOLVERTON: I'm going to -- 11:51:41

19 Q -- during her tenure at the State 11:51:42
20 Department? 11:51:44

21 MS. WOLVERTON: I'm going to object. 11:51:44

22 MS. COTCA: I would just like to finish 11:51:46

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1	asking the question. Thank you.	11:51:47
2	Q Do you know whether Secretary Clinton ever	11:51:50
3	deleted any of her work-related e-mails on her	11:51:55
4	Clintonemail.com account during her tenure at the	11:51:57
5	State Department?	11:52:01
6	MS. WOLVERTON: I'm going to object to	11:52:01
7	this line of questioning as extending beyond the	11:52:02
8	scope of the authorized discovery.	11:52:04
9	MS. COTCA: It goes to the operation of	11:52:11
10	the Clintonemail.com system.	11:52:12
11	MS. WOLVERTON: It goes to records	11:52:13
12	preservation, which is beyond the scope.	11:52:15
13	MS. COTCA: And operation of the	11:52:17
14	Clintonemail.com system.	11:52:18
15	MS. WOLVERTON: I would disagree.	11:52:19
16	MS. COTCA: Your objection is stated on	11:52:21
17	the record.	11:52:22
18	MR. BRILLE: I'll -- I'll -- same	11:52:24
19	objection.	11:52:27
20	You can answer.	11:52:27
21	A Not that -- not that I'm aware of.	11:52:29
22	Q Are you familiar with tasking forms or	11:52:31

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1 search slips in connection with FOIA requests at the 11:52:55
2 State Department? 11:52:59
3 A I'm not familiar with those terms. 11:53:01
4 Q Okay. How about Form DS 1748; have you 11:53:03
5 ever seen a form like that? 11:53:09
6 A I don't know what that is. 11:53:10
7 Q All right. Did you ever have any 11:53:11
8 knowledge or any involvement in the processing of 11:53:15
9 any FOIA request that came to the State Department 11:53:21
10 during your tenure at the State Department? 11:53:25
11 MR. BRILLE: Objection. Asked and 11:53:27
12 answered. 11:53:28
13 MS. WOLVERTON: Same objection. Also 11:53:29
14 extends beyond the scope of authorized discovery. 11:53:30
15 A I don't remember any such instance. 11:53:35
16 Q Okay. Did the Secretary's office, was 11:53:36
17 there a daily meeting with senior leadership within 11:53:49
18 her office during your tenure at the State 11:53:53
19 Department? 11:53:57
20 A Yes, there was. 11:53:57
21 MR. BRILLE: Objection. Objection. 11:53:57
22 Scope. 11:53:59

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1	How does this bear upon the issues?	11:54:01
2	MS. COTCA: If FOIA was ever discussed	11:54:04
3	during those meetings. I'm just laying the	11:54:06
4	foundation.	11:54:07
5	MR. BRILLE: I'll -- I'll allow you to	11:54:11
6	answer the question. Go ahead.	11:54:14
7	A Yes. We did have daily meetings.	11:54:16
8	Q Okay. Was FOIA ever discussed during	11:54:18
9	those meetings?	11:54:20
10	A I don't -- I don't remember.	11:54:20
11	Q Okay. Who partook in those meetings?	11:54:21
12	MS. WOLVERTON: Objection. Extends beyond	11:54:26
13	the scope of discovery.	11:54:28
14	MR. BRILLE: I think we're way beyond the	11:54:29
15	scope at this point. What's -- she just said she	11:54:31
16	doesn't remember discussions, so how is this within	11:54:34
17	the scope?	11:54:37
18	MS. COTCA: She doesn't remember whether	11:54:37
19	or not --	11:54:38
20	Q Well, what is your recollection; that FOIA	11:54:38
21	was not discussed during those meetings, or you have	11:54:40
22	no recollection one way or another?	11:54:42

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1 MR. BRILLE: I think the record is clear. 11:54:43
2 She said she didn't recall it being discussed. 11:54:44
3 MS. COTCA: No. I think you're answering 11:54:44
4 for the witness right now. 11:54:45
5 MR. BRILLE: No, I am not. 11:54:46
6 MS. COTCA: I'm asking the witness to 11:54:47
7 clarify her answer. 11:54:48
8 MR. BRILLE: You're asking -- 11:54:49
9 BY MS. COTCA: 11:54:50
10 Q What is your recollection with respect to 11:54:50
11 discussions about FOIA during the daily meetings, 11:54:52
12 with respect to FOIA? 11:54:55
13 MR. BRILLE: Objection. Asked and 11:54:56
14 answered. 11:54:57
15 MS. COTCA: Okay. 11:54:58
16 Q Please answer. 11:54:59
17 A I don't remember discussions about FOIA in 11:55:00
18 our daily meetings. We did -- we had a lot of -- we 11:55:02
19 had a lot of meetings, but I don't -- I don't 11:55:05
20 remember discussions. 11:55:07
21 Q Okay. Do you have knowledge about a FOIA 11:55:08
22 request that was submitted by CREW in December 2012 11:55:25

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1 to the State Department for records relating to 11:55:30
2 Secretary Clinton's e-mails? 11:55:35
3 A Can you -- did you -- did you say CREW? 11:55:36
4 Q Yes. 11:55:38
5 A I -- no, I'm not. I don't know what that 11:55:41
6 is, and I'm not -- I'm not aware. 11:55:43
7 Q It's an organization, a nonprofit 11:55:46
8 organization, that submitted a FOIA request in 11:55:51
9 December 2012 to the State Department for records 11:55:55
10 relating to Secretary Clinton's e-mail accounts and 11:55:58
11 use of those accounts for State Department business. 11:56:02
12 A Yes. 11:56:04
13 Q Do you have any knowledge about that 11:56:04
14 request? 11:56:06
15 A I -- I know about it through media reports 11:56:09
16 in the last year, yes. 11:56:12
17 Q Okay. Do you -- so you -- did you not 11:56:14
18 have any knowledge about it during your tenure at 11:56:17
19 the State Department? 11:56:19
20 A No. 11:56:20
21 Q Okay. And since leaving the State 11:56:20
22 Department, what did you learn about that request? 11:56:23

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1	A	Just, as I mentioned, media reports	11:56:28
2		mentioning that there had been a FOIA request sent	11:56:31
3		while -- while she was at State that wasn't received	11:56:36
4		until after she left. I mean, that's the extent of	11:56:40
5		my memory from what I read in the -- in the -- in	11:56:43
6		the news stories.	11:56:45
7	Q	All right. Did you -- are you aware of	11:56:46
8		the State Department's OIG report that was issued in	11:56:50
9		January 2016 discussing processing of FOIA during	11:56:54
10		Secretary Clinton's tenure?	11:56:58
11	A	I'm -- I'm aware there was a report, yes.	11:57:00
12	Q	Okay. Did you review that report at any	11:57:01
13		point?	11:57:05
14	A	I have not reviewed that report.	11:57:05
15	Q	Okay. Did you discuss it with anybody	11:57:07
16		other than your attorneys?	11:57:09
17	A	No.	11:57:10
18	Q	So it's fair then that you do not know	11:57:10
19		Cheryl Mills' involvement, State Spokesperson Brock	11:57:20
20		Johnson, Heather Samuelson's involvement with that	11:57:28
21		FOIA request?	11:57:31
22		MS. WOLVERTON: Objection. Vague.	11:57:33

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1	What FOIA request are you talking about;	11:57:37
2	the CREW?	11:57:39
3	MS. COTCA: Yes. We're still on the same	11:57:40
4	subject.	11:57:42
5	MR. BRILLE: I'm going to object as vague.	11:57:42
6	Form.	11:57:44
7	You can -- if you understand the question,	11:57:46
8	you can answer.	11:57:48
9	A I don't -- I don't -- I don't recall	11:57:49
10	any -- I don't know anything about this, no.	11:57:53
11	Q Okay. Since leaving the State Department,	11:57:56
12	did you learn anything with respect to Cheryl Mills'	11:57:59
13	involvement with processing of the FOIA requests	11:58:02
14	submitted by CREW in December 2012?	11:58:05
15	A No.	11:58:07
16	Q All right. Since leaving the State	11:58:08
17	Department, did you learn anything with respect to	11:58:10
18	Heather Samuelson's involvement in processing that	11:58:12
19	same request?	11:58:15
20	A No.	11:58:16
21	Q All right. Same question with respect to	11:58:17
22	State Spokesman Brock Johnson's involvement with	11:58:21

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1	respect to processing that FOIA request.	11:58:27
2	A No.	11:58:27
3	Q Okay. And the same question with respect	11:58:28
4	to State Department Attorney Josh Dawson and his	11:58:29
5	involvement in processing that FOIA request?	11:58:34
6	MS. WOLVERTON: Objection. Calls for	11:58:36
7	attorney-client, attorney work product information.	11:58:39
8	MS. COTCA: I don't see that at all. But	11:58:44
9	unless you're --	11:58:47
10	MR. BRILLE: Just -- just in answering the	11:58:47
11	question, to the extent you have knowledge of	11:58:48
12	discussions with lawyers, just don't reveal the	11:58:50
13	discussions.	11:58:52
14	You can answer the question, I think, as	11:58:52
15	she has phrased it.	11:58:54
16	THE WITNESS: Okay.	11:58:56
17	A No.	11:58:56
18	Q Did you ever discuss this FOIA request --	11:58:57
19	and by this FOIA request: I mean the CREW FOIA	11:59:10
20	request -- with Cheryl Mills?	11:59:13
21	A No.	11:59:15
22	Q How about with Secretary Clinton?	11:59:15

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1	A	No.	11:59:17
2	Q	Were you contacted --	11:59:17
3		MS. COTCA: I'm sorry.	11:59:22
4		MR. BRILLE: I was just going to ask when	11:59:23
5		you were getting to a breaking point for lunch. I	11:59:25
6		was just going to inquire.	11:59:27
7		MS. COTCA: Sure. I think we can come to	11:59:28
8		a good breaking point in just a couple of minutes.	11:59:30
9		MR. BRILLE: Okay.	11:59:32
10		MS. COTCA: Thank you.	11:59:33
11		BY MS. COTCA:	11:59:33
12	Q	Were you contacted by the State	11:59:34
13		Department's OIG office with respect to their	11:59:36
14		investigation for their January 2016 report?	11:59:40
15		MR. BRILLE: Objection. Scope. Is	11:59:44
16		there -- do you want to tell me what the scope is?	11:59:48
17		MS. COTCA: Sure. The investigation deals	11:59:50
18		with FOIA processing during State Department --	11:59:52
19		during Secretary Clinton's tenure at the State	11:59:54
20		Department and is a completed investigation. So I	11:59:58
21		think it falls entirely within the scope.	12:00:00
22		MR. BRILLE: I'm going to object and	12:00:02

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1	instruct the witness not to answer.	12:00:03
2	I don't think it's in scope.	12:00:05
3	Q Were you contacted by the State	12:00:09
4	Department's OIG office to discuss FOIA processing	12:00:12
5	at the State Department during Secretary Clinton's	12:00:19
6	tenure?	12:00:22
7	MS. WOLVERTON: I'm going to object also	12:00:25
8	as beyond the scope.	12:00:27
9	MR. BRILLE: Same.	12:00:27
10	MS. WOLVERTON: Beyond the scope.	12:00:29
11	MR. BRILLE: Same objection.	12:00:30
12	I'm going to instruct the witness not to	12:00:31
13	answer.	12:00:32
14	Q Okay. In the past -- well, since	12:00:34
15	January -- strike that.	12:00:49
16	Since September of 2015, were you	12:00:54
17	contacted by anybody within the State Department's	12:00:58
18	OIG office to discuss issues relating to FOIA	12:01:01
19	processing in Secretary Clinton's office during her	12:01:07
20	tenure at the State Department?	12:01:10
21	MS. WOLVERTON: Objection.	12:01:12
22	MR. BRILLE: Same objection.	12:01:13

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1	MS. WOLVERTON: Beyond the scope, vague.	12:01:14
2	MS. COTCA: Are you instructing her not to	12:01:17
3	answer?	12:01:18
4	MR. BRILLE: Yes.	12:01:18
5	MS. COTCA: Okay.	12:01:19
6	Q And are you following the advice of your	12:01:20
7	counsel by not answering the question?	12:01:23
8	A Yes. Uh-huh.	12:01:24
9	Q Okay.	12:01:25
10	MS. COTCA: Do you want to break for	12:01:45
11	lunch?	12:01:46
12	MR. BRILLE: Yeah. If we're going to go	12:01:47
13	to a new topic, I would prefer to.	12:01:48
14	MS. COTCA: Just trying to see how long it	12:01:50
15	will take me to finish this -- this portion of it.	12:01:52
16	Why don't we go ahead and break now.	12:01:56
17	MR. BRILLE: Okay.	12:01:58
18	MS. COTCA: And then we'll come back after	12:01:58
19	lunch.	12:02:00
20	MR. BRILLE: Okay.	12:02:00
21	VIDEO SPECIALIST: We are off the record	12:02:01
22	at 12:02.	12:02:02

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1	(A recess was taken.)	12:02:04
2	VIDEO SPECIALIST: Here begins Tape 3. We	12:58:45
3	are back on the record at 12:58.	12:58:50
4	BY MS. COTCA:	12:58:52
5	Q Welcome back, Ms. Abedin.	12:58:53
6	Your attorney I believe had something to	12:58:57
7	say I believe with respect to a previous	12:58:58
8	instruction.	12:59:00
9	MR. BRILLE: Yes. Thank you. Ms. Cotca,	12:59:00
10	we have -- at the break we've reflected on our prior	12:59:03
11	instruction with respect to the question regarding	12:59:05
12	the OIG report.	12:59:08
13	We're going to maintain the scope	12:59:08
14	objection, but we're going to withdraw the	12:59:10
15	instruction on the question. So to the extent you	12:59:13
16	have questions in that regard, we're going to allow	12:59:15
17	Ms. Abedin to answer.	12:59:17
18	MS. COTCA: Thank you very much.	12:59:18
19	BY MS. COTCA:	12:59:18
20	Q Ms. Abedin, then let's just go back to the	12:59:19
21	questioning about the State Department's OIG's	12:59:22
22	report issued in January of 2016, in connection with	12:59:25

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1 FOIA processing during Secretary Clinton's tenure. 12:59:29

2 Were you contacted by the State OIG's 12:59:34

3 office in connection -- in connection with their 12:59:37

4 investigation? 12:59:41

5 MS. WOLVERTON: We just maintain the 12:59:41

6 objection on the scope ground, as well. 12:59:43

7 MS. COTCA: Okay. 12:59:45

8 MR. BRILLE: Same objection. 12:59:46

9 Go ahead. 12:59:46

10 A Yes. I was contacted through my 12:59:47

11 attorneys. 12:59:49

12 Q Okay. And did you refuse to speak with 12:59:50

13 the State OIG's office in connection with their 12:59:54

14 investigation? 12:59:57

15 MR. BRILLE: Objection. Form. 12:59:57

16 A On the advice of my attorneys I did, yes. 12:59:59

17 Q Okay. Also, are you familiar with a 13:00:01

18 report that was issued by the State Department's OIG 13:00:05

19 office in May of this year with respect to Secretary 13:00:08

20 Clinton's use of the Clintonemail.com during her 13:00:13

21 tenure at the State Department? 13:00:16

22 A I'm not -- I'm not aware that there 13:00:21

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1	were -- there were two reports. So I'm not aware	13:00:24
2	that there were two. I know there was a report that	13:00:29
3	I was asked to participate in that through my	13:00:33
4	attorneys, and I declined to do so through my	13:00:36
5	attorneys.	13:00:39
6	Q Okay. When was that?	13:00:39
7	A Sometime -- sometime this year.	13:00:41
8	Q Okay. If you can just try to narrow that	13:00:44
9	down. Was it in wintertime or in springtime?	13:00:51
10	A I think it was -- it was closer to the	13:01:07
11	wintertime.	13:01:10
12	Q Closer to the wintertime?	13:01:10
13	A Yes.	13:01:12
14	Q Do you know if that was after January of	13:01:12
15	this year?	13:01:13
16	A I don't know.	13:01:14
17	Q Okay. All right. Let's move on.	13:01:14
18	Earlier this morning I believe you	13:01:28
19	mentioned there was a meeting towards the end of	13:01:31
20	your tenure at the State Department with Clarence	13:01:35
21	Finney in preparation to leave for the department.	13:01:37
22	Do you recall that testimony?	13:01:42

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1	A	Yes.	13:01:43
2	Q	Okay. Can you just tell me about that	13:01:43
3		meeting, how it came about, who was in the meeting	13:01:45
4		and what was discussed in the meeting?	13:01:47
5	A	Yes. As the Secretary was preparing to	13:01:50
6		transition from the State Department, I don't	13:01:53
7		remember if I requested it through Clarence or vice	13:01:58
8		versa. But we met with Clarence and other members	13:02:01
9		of the Secretary's staff to get guidance on how we	13:02:05
10		should be collecting the documents that we would be	13:02:11
11		allowed to leave with at the end of her tenure.	13:02:16
12	Q	Okay. And what is the guidance that was	13:02:18
13		provided with respect to what documents you could	13:02:20
14		leave, from the State Department?	13:02:25
15		MS. WOLVERTON: Objection. The question	13:02:27
16		exceeds the scope of the authorized discovery.	13:02:28
17		MR. BRILLE: Same objection.	13:02:31
18		You can answer.	13:02:32
19	A	We were -- we were all told to go through	13:02:34
20		our files. And anything that appeared as though --	13:02:37
21		that was -- anything related to the State Department	13:02:42
22		or work at the State Department we either left or	13:02:45

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1 made requests to make copies of, and they reviewed 13:02:50
2 those boxes before -- before they were sealed. 13:02:54
3 Q Okay. Was Mr. Finney in this meeting? 13:02:57
4 A Yes. 13:02:59
5 Q Okay. Were e-mails discussed with respect 13:03:00
6 to records that had to be gone through, for you to 13:03:04
7 go through? 13:03:07
8 MS. WOLVERTON: Objection. Exceeds the 13:03:07
9 scope of the authorized discovery. 13:03:08
10 MR. BRILLE: You can answer. Go ahead. 13:03:11
11 A We discussed leaving -- returning our 13:03:13
12 devices at the end of our tenure and also told that 13:03:17
13 the only materials we were allowed to leave with the 13:03:24
14 State Department were our personal photos that may 13:03:28
15 have been taken on our State Department BlackBerrys 13:03:31
16 and retained on our -- on our desktops, and our 13:03:35
17 contacts. 13:03:38
18 And we came in with most of our contacts. 13:03:38
19 And so -- and everything else was left on our 13:03:41
20 laptops, preserved on our laptops. And I was given 13:03:44
21 a disk, a CD disk, that had my contacts and my -- 13:03:48
22 and my photos on it. And I left with that. 13:03:51

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1	Everything else stayed.	13:03:54
2	Q And just for the clarity of the record,	13:03:54
3	the CD, that was your personal items that you left	13:03:58
4	with?	13:04:01
5	A Those were my photos and the contact --	13:04:01
6	the contacts that were uploaded onto my State	13:04:06
7	Department computer that I had come in with and had	13:04:12
8	been updated in the four years that we were there.	13:04:14
9	And I was allowed to take those with me.	13:04:17
10	Q And what about any discussions during the	13:04:18
11	meetings with respect to e-mails, work-related	13:04:21
12	e-mails -- and again when I say "work related" I	13:04:24
13	mean State Department-related e-mails -- that	13:04:27
14	existed on personal e-mail accounts?	13:04:30
15	A I don't remember specifics of discussing	13:04:32
16	that in a meeting with Clarence.	13:04:34
17	Q Was there any guidance on -- by Mr. Finney	13:04:36
18	or anybody else with respect to what to do with the	13:04:39
19	State Department-related e-mails on personal e-mail	13:04:43
20	accounts?	13:04:45
21	A I don't remember having that conversation,	13:04:47
22	that specific conversation, in the meeting.	13:04:49

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1	Q	Did anybody ask from the Secretary's	13:04:52
2		office with respect to what to do with the -- with	13:04:55
3		their State Department-related e-mails on their	13:05:00
4		personal e-mail accounts?	13:05:03
5	A	I don't remember.	13:05:04
6	Q	Who was in the meeting?	13:05:07
7	A	Myself, Clarence. From -- from the	13:05:12
8		personal staff that was leaving Rob Russo was there,	13:05:17
9		Monica Hanley, Joe Macmanus, Lona Valmoro. Those	13:05:21
10		are the people I remember in the meeting.	13:05:37
11	Q	Okay. Was Cheryl Mills in that meeting?	13:05:39
12	A	I don't remember Cheryl being in that	13:05:42
13		particular meeting.	13:05:44
14	Q	Okay. And again, to clarify, is it only	13:05:44
15		one meeting that you had with Mr. Finney with	13:05:47
16		respect to what to do with your work-related	13:05:49
17		documents and your personal documents prior to	13:05:54
18		leaving the State Department?	13:05:56
19	A	My memory was one -- one meeting that --	13:05:57
20		that took place. And then he was regularly coming	13:06:00
21		by our desks in the -- in the days after that,	13:06:04
22		reviewing all the boxes, and then authorizing what	13:06:08

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1	could leave and allowing those boxes to be sealed,	13:06:14
2	so ...	13:06:16
3	Q Okay. Where was the meeting held?	13:06:17
4	A In the conference room in the Secretary's	13:06:19
5	office.	13:06:22
6	Q Okay. Do you remember when or how soon	13:06:22
7	prior to leaving the State Department this meeting	13:06:25
8	took place?	13:06:27
9	A I remember it was a few months, if -- I	13:06:31
10	believe it was -- it was -- it was a few months.	13:06:34
11	Q So it's fair to say then that there	13:06:39
12	were -- there was plenty of time for followup	13:06:41
13	questions if any of the Secretary's staff had with	13:06:43
14	respect to additional guidance they needed on what	13:06:47
15	to do with their State Department-related records?	13:06:49
16	MS. WOLVERTON: Objection. Exceeds the	13:06:53
17	scope of discovery, and vague.	13:06:54
18	A My memory was it was a -- it was a few	13:06:57
19	months. It wasn't right before we left.	13:06:59
20	Q Okay. Do you know if Lauren Jiloty, was	13:07:01
21	she part of the meeting?	13:07:08
22	A I'm fairly certain Lauren had already left	13:07:11

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1	her next position at that point.	13:07:13
2	Q How about Jacob Sullivan; was he part of	13:07:16
3	that meeting?	13:07:18
4	A I don't remember Jake.	13:07:23
5	Q What about Secretary Clinton; was she in	13:07:25
6	the meeting?	13:07:27
7	A She was not.	13:07:28
8	Q Okay. How was Secretary Clinton advised	13:07:28
9	prior to leaving to the State Department on what she	13:07:36
10	needed to do with respect to sorting her State	13:07:39
11	Department-related records and her personal records	13:07:46
12	prior to leaving the State Department?	13:07:49
13	MS. WOLVERTON: Objection. Exceeds the	13:07:51
14	scope of authorized discovery, and lack of	13:07:52
15	foundation.	13:07:55
16	MR. BRILLE: Same objections.	13:07:56
17	Go ahead.	13:07:59
18	A The people in that room were the support	13:08:00
19	staff managing the -- the paper records that	13:08:02
20	Secretary Clinton had -- had accumulated over her	13:08:07
21	time at the State Department. And the staff was	13:08:11
22	doing that on behalf of her paper records, as well.	13:08:13

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1 Q So it's fair then to say that the 13:08:16
2 Secretary received the same guidance that you 13:08:20
3 received during that meeting? 13:08:22
4 MS. WOLVERTON: Objection. Exceeds the 13:08:24
5 scope of the discovery. 13:08:25
6 A She was not -- 13:08:27
7 MR. BRILLE: Wait. 13:08:27
8 THE WITNESS: Sorry. 13:08:28
9 MR. BRILLE: Objection. Foundation. 13:08:29
10 Go ahead. Now you -- 13:08:30
11 A She was not at the meeting. 13:08:32
12 Q Okay. Did Secretary Clinton, as far as 13:08:33
13 you know, sort -- personally sort through any of her 13:08:42
14 records to determine what stays at the State 13:08:46
15 Department and what she takes with her after leaving 13:08:49
16 the State Department? 13:08:51
17 MS. WOLVERTON: Objection. Exceeds the 13:08:53
18 scope of the discovery authorized. 13:08:54
19 MR. BRILLE: Objection. Foundation. 13:08:57
20 Go ahead. 13:08:58
21 A The Secretary's office was also packed up 13:08:59
22 and the materials that were put in boxes, this was 13:09:03

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1 everything from the books that she had on her 13:09:06
2 bookshelf, to decorations or gifts that she may have 13:09:11
3 received, and paper. All of those items were packed 13:09:15
4 by staff, and those boxes were also not sealed until 13:09:20
5 the protocol office had signed off on the items that 13:09:24
6 were taken. And the same thing with the -- the 13:09:27
7 papers. 13:09:30
8 She may have been in her office when that 13:09:31
9 happened. I have no memory of her -- of her being 13:09:36
10 there herself when we were packing. 13:09:39
11 Q Did the Secretary provide any instructions 13:09:41
12 with respect to what to do with her work -- State 13:09:44
13 Department-related e-mails on her Clintonemail.com 13:09:49
14 prior to leaving the State Department? 13:09:52
15 A Not that I'm aware of. 13:09:54
16 Q Did you ask her for any instructions with 13:09:55
17 respect to what to do with her State-related 13:10:02
18 e-mails? 13:10:06
19 A I don't remember. 13:10:07
20 Q Do you know if anybody did? 13:10:08
21 A I don't. 13:10:11
22 Q Did you at any point during the meeting or 13:10:12

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1	after the meeting inform Mr. Finney about the	13:10:20
2	State-related e-mails on your Clintonemail.com prior	13:10:28
3	to leaving to the State Department?	13:10:32
4	MS. WOLVERTON: Objection. Asked and	13:10:35
5	answered.	13:10:36
6	MR. BRILLE: Yeah. Same objection.	13:10:36
7	A I don't remember talking to Clarence.	13:10:38
8	Q Okay. Do you know if anybody informed	13:10:39
9	Mr. Finney with respect to your State-related	13:10:41
10	e-mails on your Clintonemail.com system in this	13:10:45
11	transition period prior to leaving the State	13:10:49
12	Department?	13:10:54
13	MS. WOLVERTON: Same objection.	13:10:54
14	A I -- I'm not aware.	13:10:56
15	Q Do you know if anybody instructed -- or	13:10:58
16	informed Mr. Finney with respect to State-related	13:11:03
17	e-mails on Secretary Clinton's e-mail account during	13:11:06
18	this transition period prior to leaving the State	13:11:13
19	Department?	13:11:16
20	MS. WOLVERTON: Objection. Asked and	13:11:16
21	answered.	13:11:17
22	A I'm -- I'm not aware.	13:11:21

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1	Q	Do you know why nobody informed Mr. Finney	13:11:28
2		about the State-related e-mails on Secretary	13:11:32
3		Clinton's Clintonemail.com account?	13:11:38
4	MS. WOLVERTON:	Objection. Assumes facts	13:11:43
5		not in evidence, lack of foundation.	13:11:44
6	MR. BRILLE:	Objection. Lacks foundation.	13:11:45
7	A	I -- as I think I've mentioned earlier, it	13:11:48
8		is not anything that occurred to us. We all wish we	13:11:52
9		could go back and that not be the case. It did not	13:11:57
10		occur to those of us who were involved.	13:12:00
11	Q	And is that the same answer? I'm	13:12:05
12		specifically asking for the time period during the	13:12:07
13		transition process prior to leaving the State	13:12:10
14		Department.	13:12:12
15	A	Yes, ma'am. I understand. It did not --	13:12:13
16		it did not occur to us.	13:12:15
17	Q	Was anybody else other than Mr. Finney who	13:12:16
18		participated in the meeting from the Office of the	13:12:29
19		Correspondence and Records?	13:12:32
20	A	I remember Clarence. I don't remember --	13:12:36
21		I don't remember anybody else from his office being	13:12:38
22		there.	13:12:39

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1	Q	Do you remember anybody else from any	13:12:40
2		other office being in the meeting?	13:12:44
3	A	No, I don't.	13:12:45
4	Q	Ms. Abedin, are you familiar with the	13:12:46
5		SMART system that was introduced at the State	13:13:04
6		Department in 2009? And SMART system stands for	13:13:06
7		State messaging and archiving retrieval toolset.	13:13:10
8	A	I -- I don't know what that is.	13:13:15
9	Q	Okay. Do you recall any discussions in	13:13:16
10		the State Department about electing to use that	13:13:25
11		system to preserve records in the Secretary's office	13:13:28
12		at all during your tenure at the State Department?	13:13:33
13		MS. WOLVERTON: Objection. Exceeds the	13:13:35
14		scope of discovery.	13:13:37
15	A	I don't. I don't know what that is.	13:13:38
16	Q	And you don't recall any discussions	13:13:39
17		about -- about it?	13:13:44
18		MS. WOLVERTON: Same objection.	13:13:45
19	A	I -- I don't know. I don't recall any	13:13:46
20		discussions, no.	13:13:47
21	Q	I would like to go through some documents	13:13:48
22		with you.	13:14:00

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1	MS. COTCA: What exhibit are we on?	13:14:18
2	COURT REPORTER: Exhibit 4.	13:14:20
3	MS. COTCA: It will be marked as Exhibit	13:14:21
4	4.	13:14:22
5	(Abedin Deposition Exhibit 4 marked for	13:14:30
6	identification and is attached to the transcript.)	13:14:32
7	Q If you can take a look at it --	13:14:32
8	A Thank you.	13:14:32
9	Q -- and let me know when you're done	13:14:32
10	reviewing the document.	13:14:34
11	(A discussion was held off the record.)	13:14:44
12	Q Have you reviewed the document?	13:15:06
13	A Yes.	13:15:08
14	Q Okay. Prior to today, have you seen this	13:15:08
15	document before?	13:15:10
16	A Yes, I have.	13:15:10
17	Q Okay. And when was that?	13:15:11
18	A When I was reviewing with my attorneys.	13:15:13
19	Q Okay. And that is in preparation for	13:15:15
20	today's deposition. Right?	13:15:16
21	A Yes.	13:15:18
22	Q Okay. Thank you.	13:15:18

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1 Do you -- during the tran -- and I want to 13:15:24
2 switch to the transition process when Secretary 13:15:27
3 Clinton came onboard to the State Department. 13:15:30
4 A Okay. 13:15:32
5 Q Do you recall any work that was done by 13:15:33
6 State Department employees on the Clinton e-mail 13:15:38
7 server that was located in Secretary Clinton's 13:15:42
8 office -- house in New York? 13:15:45
9 MR. BRILLE: Objection to -- I'll state 13:15:48
10 objection, form, foundation. 13:15:50
11 You can answer the question. 13:15:51
12 MS. WOLVERTON: Same objection. 13:15:52
13 A I recall that there was equipment, State 13:15:54
14 Department equipment, installed in both her 13:15:58
15 residences, in New York and in Washington. 13:16:00
16 Q Okay. And I want to focus on the 13:16:02
17 equipment installed in her residence in New York. 13:16:05
18 Were you involved in setting up the -- in 13:16:11
19 setting up for the State Department employees to go 13:16:20
20 in and install whatever they needed to install at 13:16:22
21 the Secretary's residence in New York? 13:16:26
22 A Yes, I was. 13:16:28

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1	Q	Okay. And were you aware at that time	13:16:28
2		about the work they were doing on the server in her	13:16:32
3		residence?	13:16:34
4	MR. BRILLE:	Objection.	13:16:36
5	MS. WOLVERTON:	Objection. Lack of	13:16:36
6		foundation, vague.	13:16:37
7	A	No.	13:16:39
8	Q	Okay. Do you know who Purcell Lee is?	13:16:39
9	A	I do know Purcell, yes.	13:16:48
10	Q	Okay. Thank you. And who is Purcell?	13:16:49
11	A	Purcell was our main point of contact on	13:16:52
12		all matters related to technology needs in the	13:16:56
13		Secretary's office, or for when we were traveling	13:17:01
14		domestically or overseas.	13:17:05
15	Q	Okay. And was Purcell Lee with the --	13:17:07
16		working within the Secretary's office or in a	13:17:13
17		separate office of the State Department?	13:17:15
18	A	He -- he was in a separate office, but he	13:17:17
19		would come into the Secretary's office to do	13:17:20
20		whatever work was required.	13:17:22
21	Q	Okay. And what office did he work in?	13:17:23
22	A	Purcell, he -- he was in IT, the IT office	13:17:35

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1	at the department, but responsible for the	13:17:46
2	Secretary's offices' technical -- technical needs.	13:17:47
3	Q Okay. Do you recall Mr. Lee's title or	13:17:51
4	position back in 2009?	13:17:56
5	A I'm sorry, I don't.	13:17:59
6	Q How about Kevin Wagganer; do you know who	13:18:01
7	he is?	13:18:05
8	A I don't. The name is not familiar to me.	13:18:08
9	Q How about John Bentel, you do not recall	13:18:12
10	the name. Is that right?	13:18:14
11	A I don't know John Bentel.	13:18:15
12	Q Okay. And you don't know that he was the	13:18:16
13	director of the IRM office for the Executive	13:18:18
14	Secretariat during that time?	13:18:24
15	MS. WOLVERTON: Objection. Assumes facts	13:18:25
16	not in evidence. Foundation.	13:18:26
17	MR. BRILLE: Same objection.	13:18:28
18	A I don't remember John Bentel.	13:18:30
19	Q And how about Andrew Scott; do you know	13:18:31
20	who Andrew Scott is?	13:18:34
21	A No.	13:18:35
22	Q Okay. And Bruce Dunkin; do you know who	13:18:35

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1	Bruce Dunkin is?	13:18:40
2	A No.	13:18:42
3	Q Were you informed or -- about the work	13:18:42
4	they did on the server in the basement of the	13:18:55
5	residence that's referenced on Page 2 of the	13:18:58
6	exhibit?	13:19:01
7	MR. BRILLE: Objection. Lacks foundation.	13:19:01
8	MS. WOLVERTON: Same objection. Assumes	13:19:03
9	facts not in evidence.	13:19:04
10	A I don't being -- I don't remember being	13:19:06
11	informed about that.	13:19:08
12	Q Okay. On Page 2, do you see where the	13:19:10
13	server is identified in the basement telephone	13:19:14
14	closet?	13:19:16
15	A I see that.	13:19:17
16	Q Okay. Do you know what server that is?	13:19:18
17	A From this doc -- no.	13:19:25
18	Q Do you know, are you familiar with a term	13:19:27
19	"hot wash"?	13:19:48
20	A I had never heard it until I saw this	13:19:50
21	document.	13:19:51
22	Q Me neither.	13:19:52

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1	All right. You can put that away.	13:19:56
2	MS. COTCA: Would you mark this as Exhibit	13:20:03
3	5.	13:20:04
4	(Abedin Deposition Exhibit 5 marked for	13:20:05
5	identification and is attached to the transcript.)	13:20:18
6	Q Let me know when you have had a chance to	13:20:18
7	look over the document.	13:20:28
8	A Yeah. Yes.	13:20:42
9	Q Okay. I just want to point your direction	13:20:43
10	to the last e-mail on the document, it looks like	13:20:48
11	it's from Secretary Clinton to Lona Valmore and you.	13:20:51
12	Do you see that?	13:20:56
13	A Yes, I do.	13:20:58
14	Q Okay. And the date of that is September	13:20:58
15	10, 2009. Is that right?	13:21:02
16	MR. BRILLE: I don't think that's the	13:21:06
17	date.	13:21:08
18	Q September 20th, 2009.	13:21:08
19	MS. COTCA: Thank you.	13:21:11
20	A That's right.	13:21:12
21	Q Okay. Thank you.	13:21:12
22	Do you see in the cc line that e-mail	13:21:15

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1	address, H2 -- well, the address looks like	13:21:19
2	HR15@ATT.Blackberry.net?	13:21:23
3	A Yes.	13:21:25
4	Q All right. Is that the Secretary	13:21:26
5	Clinton's e-mail address that you testified to	13:21:28
6	earlier today?	13:21:31
7	A That's the one I remember, yes.	13:21:32
8	Q Okay. And you didn't seem to remember	13:21:33
9	when she phased out of using that e-mail account.	13:21:37
10	After reviewing this document, does the	13:21:44
11	document refresh your recollection about the time	13:21:46
12	frame of when she phased out using that e-mail	13:21:49
13	account?	13:21:53
14	A No, it doesn't.	13:21:56
15	Q Do you know why the Secretary copied, or	13:21:57
16	included her BlackBerry -- ATT.Blackberry.net e-mail	13:22:04
17	on the cc line in her e-mail to you and Ms. Valmoro?	13:22:09
18	A I don't know why.	13:22:16
19	Q You can put that away.	13:22:17
20	A Okay.	13:22:51
21	MS. COTCA: Exhibit 6.	13:22:59
22	Thank you.	13:23:11

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1	(Abedin Deposition Exhibit 6 marked for	13:23:12
2	identification and is attached to the transcript.)	13:23:21
3	Q Just very briefly, going back to Exhibit	13:23:21
4	5.	13:23:25
5	A Yes.	13:23:25
6	Q Would Secretary Clinton know why she	13:23:25
7	copied her e-mail address on that e-mail?	13:23:29
8	MS. WOLVERTON: Objection.	13:23:32
9	MR. BRILLE: Objection to form.	13:23:33
10	MS. WOLVERTON: Foundation. Lack of	13:23:34
11	personal knowledge.	13:23:35
12	MR. BRILLE: Foundation.	13:23:36
13	A I don't know.	13:23:38
14	Q I'm done with that exhibit. You can put	13:23:44
15	that away.	13:23:46
16	A Okay.	13:23:46
17	MR. BRILLE: She wants -- she wants you to	13:23:49
18	review this one.	13:23:50
19	THE WITNESS: Okay.	13:23:51
20	MR. BRILLE: I think.	13:23:52
21	THE WITNESS: Okay.	13:23:53
22	BY MS. COTCA:	13:23:53

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1	Q	Let me know when you're done reviewing it.	13:23:53
2	A	Okay.	13:23:59
3	Q	All right. And is this a fair description	13:23:59
4		of the document, it looks like to be an e-mail from	13:24:02
5		Secretary Clinton to -- is that Lauren Jiloty?	13:24:05
6	A	That is Lauren Jiloty, yes.	13:24:11
7	Q	Okay. And the date of the e-mail, for the	13:24:12
8		record, is May 7, 2009. Is that right?	13:24:15
9	A	That's right.	13:24:18
10	Q	Okay. It looks like Secretary Clinton	13:24:18
11		e-mailed Ms. Jiloty to help her update her berry	13:24:27
12		with e-mail addresses of key staff like Monica,	13:24:32
13		Chris, et cetera.	13:24:35
14		Do you see that?	13:24:35
15	A	I do.	13:24:36
16	Q	Okay. I just have some questions about	13:24:37
17		that.	13:24:38
18		When Secretary Clinton referred to "my	13:24:39
19		berry," is she referencing her BlackBerry there?	13:24:40
20	A	Yes.	13:24:43
21	Q	Okay. And that's the BlackBerry that she	13:24:44
22		used for her State Department business. Correct?	13:24:46

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1	A	Yes.	13:24:49
2	Q	Okay. And, also, key staff like Monica	13:24:49
3		and Chris, who is Monica?	13:24:55
4	A	Monica Hanley.	13:24:58
5	Q	Okay. And do you know who Chris is?	13:24:59
6	A	I don't know who she's referring to when	13:25:06
7		she wrote "Chris" in this e-mail.	13:25:08
8	Q	Do you know if the Secretary had contacts	13:25:10
9		of senior leadership and also -- well, senior	13:25:20
10		leadership at the State Department for her State	13:25:25
11		Department business?	13:25:28
12	A	She did.	13:25:29
13	Q	I'm done with that exhibit.	13:25:29
14		How did -- well, how did Secretary	13:25:59
15		Clinton's staff update senior leadership at the	13:26:08
16		State Department where they could reach her via	13:26:13
17		e-mail for any new employees that were coming in at	13:26:18
18		the State Department?	13:26:21
19		MS. WOLVERTON: Objection. Foundation.	13:26:23
20		Vague.	13:26:25
21		MR. BRILLE: Same objection.	13:26:25
22	A	You're -- are you -- you're asking about	13:26:29

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1 when new employees came to the State Department? 13:26:31

2 Q Uh-huh. How would they know how to -- how 13:26:33

3 to contact Secretary Clinton? 13:26:35

4 MS. WOLVERTON: Same objections. 13:26:37

5 MR. BRILLE: Same objection. 13:26:38

6 A Well, most of the time they were seeing 13:26:39

7 her in person, or it wasn't uncommon for them to put 13:26:41

8 a call in to Claire. So most of their interaction, 13:26:47

9 people -- people at State Department either saw her, 13:26:49

10 talked to her by phone, requested a meeting. 13:26:52

11 There were instances where she provided 13:26:56

12 her e-mail address in meetings to senior staff, or 13:26:59

13 she would send an e-mail. And there were -- there 13:27:02

14 were staff, senior staff, who asked for her e-mail 13:27:08

15 address, and they were provided. 13:27:10

16 Q Okay. Do you know if a directory or 13:27:12

17 anything similar to a directory would be sent out to 13:27:17

18 update senior staff about, you know, how they could 13:27:21

19 contact Secretary Clinton by e-mail if they wanted 13:27:26

20 to? 13:27:30

21 A I'm -- I'm not aware of such a directory. 13:27:32

22 But we were in a -- in a -- State Department, again 13:27:34

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1	most of the business when she was there, people saw	13:27:38
2	her in person or spoke with her by phone or	13:27:39
3	participated in a meeting.	13:27:44
4	Q Okay.	13:27:46
5	A It was -- it was not her primary form of	13:27:47
6	work with State Department employees.	13:27:49
7	MS. COTCA: Can you mark that as Exhibit	13:27:53
8	7.	13:27:55
9	(Abedin Deposition Exhibit 7 marked for	13:27:55
10	identification and is attached to the transcript.)	13:28:12
11	Q If you can take a look at what's been	13:28:12
12	marked as Exhibit 7 and let me know when you're done	13:28:14
13	reviewing it.	13:28:17
14	A Okay. Yes.	13:28:52
15	Q Okay. Thank you.	13:28:54
16	And I'd like to just point you to the	13:28:59
17	last -- last e-mail on the document, from what	13:29:01
18	appears to be Secretary Clinton to Lauren Jiloty	13:29:04
19	again, dated September 7, 2009.	13:29:08
20	Do you see that?	13:29:11
21	A Yes.	13:29:15
22	Q Okay. And the subject is BlackBerry.	13:29:15

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1	Right?	13:29:18
2	A Yes.	13:29:18
3	Q Okay. Thank you.	13:29:19
4	For the record the e-mail states,	13:29:22
5	"Tomorrow please add more State names, all Under and	13:29:23
6	Assistant Secretaries and the special	13:29:27
7	assistants/exec crew. Thanks."	13:29:29
8	Again, the BlackBerry that Secretary	13:29:32
9	Clinton is referencing, is this the BlackBerry that	13:29:34
10	she used for her State Department business?	13:29:37
11	A Yes.	13:29:39
12	Q Okay. And the Under and Assistant	13:29:40
13	Secretaries the Secretary is referring to in her	13:29:47
14	September 7, 2009, are those from the State	13:29:50
15	Department?	13:29:54
16	MR. BRILLE: Objection. Foundation.	13:29:54
17	MS. WOLVERTON: Same objection.	13:29:57
18	A I -- I'm -- I'm reading the same document	13:30:00
19	that you're reading. And I'm -- this wasn't	13:30:02
20	something sent to me, so I'm -- it says in the	13:30:06
21	e-mail, All under and assistant secretaries.	13:30:09
22	Q Okay. Do you know if Secretary Clinton	13:30:11

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1 had the contacts on her BlackBerry for State 13:30:14
2 Department purposes for the Under and Assistant 13:30:20
3 Secretaries at the State Department? 13:30:24
4 A I know she had State Department staff's 13:30:29
5 e-mail addresses. I -- I couldn't tell you each -- 13:30:32
6 I couldn't list all the names of the people -- the 13:30:37
7 State staff who were in there. 13:30:39
8 Q And in that second to the bottom e-mail -- 13:30:41
9 A Uh-huh. 13:30:59
10 Q -- from Lauren Jiloty, to the Secretary on 13:30:59
11 September 8, 2009? 13:31:02
12 A Uh-huh. 13:31:03
13 Q Do you see that? 13:31:04
14 A I do. 13:31:06
15 Q Okay. Do you see where Ms. Jiloty tells 13:31:06
16 Secretary Clinton, "I'm also making a master list 13:31:09
17 for you of everyone I have added, updated, so you 13:31:11
18 can see." 13:31:15
19 Do you see that? 13:31:15
20 A I see it. 13:31:17
21 Q Okay. Do you know, was a master list 13:31:17
22 provided with everyone that's been added on the 13:31:19

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1	Secretary's BlackBerry?	13:31:23
2	MS. WOLVERTON: Objection. Vague.	13:31:27
3	A I -- well, I don't -- I don't know. I	13:31:28
4	don't recall seeing a list, a list like that. I	13:31:31
5	didn't -- I didn't participate.	13:31:33
6	Q Did you have any exchanges with Ms. Jiloty	13:31:41
7	with respect to what contacts should be put on	13:31:45
8	Secretary Clinton's BlackBerry account during her	13:31:47
9	tenure at the State Department?	13:31:50
10	A I don't remember conversations with Lauren	13:31:54
11	about who she was adding to the Secretary's	13:31:58
12	contacts, no.	13:32:00
13	Q You can put that away. Thank you.	13:32:01
14	A Yes.	13:32:11
15	MR. BRILLE: How are you doing? Are you	13:32:11
16	good?	13:32:13
17	Q Do you need a break?	13:32:16
18	A No, no, no, no, no.	13:32:17
19	MS. COTCA: Exhibit 8.	13:32:23
20	(Abedin Deposition Exhibit 8 marked for	13:32:25
21	identification and is attached to the transcript.)	13:32:37
22	MS. COTCA: I wrote on yours. Sorry.	13:32:37

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1	Could I have the extra copies back,	13:32:39
2	Ms. Abedin?	13:32:41
3	THE WITNESS: Oh, yeah. Of course.	13:32:42
4	MS. COTCA: Thank you.	13:32:44
5	Q And please review the document and let me	13:32:55
6	know once you've had a chance to review it.	13:33:00
7	A Yes, I'm -- I've read it.	13:33:13
8	Q Okay. Thank you.	13:33:14
9	Have you seen this document prior to	13:33:15
10	today?	13:33:18
11	A This one I have, yes.	13:33:18
12	Q And when was that?	13:33:19
13	A Reviewing documents with my attorneys in	13:33:24
14	preparation for today.	13:33:25
15	Q Thank you. At the top of the document, do	13:33:26
16	you see an e-mail, for the record it looks like it's	13:33:35
17	an e-mail from Monica Hanley to you, on August 30th,	13:33:40
18	2011, at the top. Is that -- did I read that	13:33:43
19	correctly?	13:33:47
20	A That's right. That's right.	13:33:47
21	Q Thank you. And it includes an e-mail	13:33:50
22	address for State.gov, SSHRC@State.gov.	13:33:53

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1	Do you see that?	13:34:00
2	A I do.	13:34:01
3	Q Are you familiar with that e-mail account?	13:34:03
4	MS. WOLVERTON: Objection.	13:34:06
5	Q Or e-mail address?	13:34:07
6	MS. WOLVERTON: Objection. Foundation.	13:34:09
7	A I'm not familiar with this particular	13:34:11
8	e-mail address.	13:34:14
9	Q Was that e-mail account -- address created	13:34:16
10	for Secretary Clinton, if you know, during the State	13:34:18
11	Department -- her tenure at the State Department?	13:34:22
12	MS. WOLVERTON: Objection. Assumes facts	13:34:25
13	not in evidence.	13:34:26
14	A The -- I have seen this document, and so I	13:34:27
15	have thought -- I've tried to think about what this	13:34:30
16	e-mail address could be. It is not familiar to me.	13:34:32
17	It is not one that I know to have been created for	13:34:35
18	her.	13:34:37
19	I do know that there were some instances	13:34:38
20	where the Secretary was sending department-wide	13:34:42
21	e-mails, if I remember correctly it was the first --	13:34:46
22	whether it was a Happy New Year message, there were	13:34:49

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1 some mass e-mails that were sent out on occasion, 13:34:53
2 and this could have been for that, thus the -- you 13:34:56
3 know, the SSHRC. 13:34:59
4 But I am otherwise not familiar with this 13:35:01
5 particular e-mail address. 13:35:04
6 Q Do you recall this e-mail exchange that 13:35:05
7 you had during your time at the State Department? 13:35:11
8 A I did not recall this exchange. And -- 13:35:13
9 and -- until I was shown this document. But I 13:35:18
10 don't -- I don't remember having this conversation 13:35:22
11 with Monica. 13:35:24
12 Q Okay. Were you aware of any conversations 13:35:25
13 or exchanges that Monica Hanley had with John Bentel 13:35:29
14 about him advising her that the e-mail would go 13:35:33
15 through the department's infrastructure and subject 13:35:39
16 to FOIA searches? 13:35:42
17 A Yes, I -- I see what's in this document. 13:35:44
18 But I wasn't aware of any conversations that Monica 13:35:46
19 had with Mr. Bentel. 13:35:49
20 Q Okay. 13:35:50
21 A Beyond this. 13:35:51
22 Q Was FOIA a sensitive issue in the 13:35:52

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1	Secretary's office during the -- Secretary Clinton's	13:35:56
2	tenure at the State Department?	13:35:59
3	MS. WOLVERTON: Objection. Vague.	13:36:01
4	MR. BRILLE: Same objection. Lacks	13:36:02
5	foundation.	13:36:03
6	A No, it wasn't.	13:36:05
7	Q Since seeing this document, have you had	13:36:05
8	any discussions about it, or the substance of it,	13:36:13
9	with anybody other than your attorneys?	13:36:17
10	A No.	13:36:19
11	Q You can put that away. Thank you.	13:36:20
12	A Thank you.	13:36:39
13	MS. COTCA: Can you mark this, please, as	13:36:47
14	Exhibit 9.	13:36:48
15	Q You know what? We're not going to mark	13:36:56
16	this. This has been previously marked as Exhibit 4	13:36:58
17	in Lukens' deposition.	13:37:01
18	A Okay.	13:37:02
19	Q Ms. Abedin, if you can take a look at it.	13:37:03
20	MR. BRILLE: You had another one that was	13:37:05
21	like it.	13:37:06
22	MS. COTCA: We do.	13:37:07

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1	MR. BRILLE: No. No. I mean you had	13:37:08
2	another exhibit that was premarked, just as an FYI.	13:37:10
3	I don't know if it matters, but ...	13:37:14
4	MS. COTCA: We do, I believe. If you	13:37:15
5	like, we can mark it here.	13:37:18
6	MR. BRILLE: No. I have no position. You	13:37:19
7	can mark it however you'd like.	13:37:22
8	MS. COTCA: Okay.	13:37:23
9	You know what? Why don't we go ahead and	13:37:27
10	mark it so we have a clear record.	13:37:29
11	(Abedin Deposition Exhibit 9 marked for	13:37:40
12	identification and is attached to the transcript.)	13:37:41
13	(A discussion was held off the record.)	13:37:49
14	VIDEO SPECIALIST: Would you like to go	13:37:49
15	off the record?	13:37:49
16	MR. BRILLE: Might as well save the tape.	13:37:51
17	Go off the record.	13:37:54
18	MS. COTCA: Sure.	13:37:56
19	VIDEO SPECIALIST: We are going off the	13:37:58
20	record. The time is 13:37 p.m.	13:37:59
21	(A recess was taken.)	13:38:03
22	VIDEO SPECIALIST: We are back on the	13:38:47

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1	record at 13:38.	13:38:49
2	BY MS. COTCA:	13:38:54
3	Q Ms. Abedin, if you can look through the	13:38:55
4	document that's been marked as Exhibit 9, and let me	13:38:57
5	know once you've had a chance to review it.	13:38:59
6	A Okay.	13:39:01
7	Yes.	13:39:37
8	Q Have you had a chance to review it?	13:39:38
9	A Yes.	13:39:39
10	Q Thank you. Just for clarity of the	13:39:39
11	record, it's been marked Abedin Exhibit 9, and also	13:39:41
12	previously marked Lukens Exhibit 4.	13:39:45
13	Prior to today's deposition, have you seen	13:39:49
14	this document?	13:39:50
15	A I have, yes.	13:39:52
16	Q Okay. And is this one of the documents	13:39:52
17	that you reviewed with your attorneys in preparation	13:39:54
18	for your deposition today?	13:39:56
19	A It is.	13:39:58
20	Q Okay. Outside of discussions you had with	13:39:58
21	your attorneys about the substance of the	13:40:03
22	communications in this document or the exhibit	13:40:06

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1 itself, did you discuss it with anybody else? 13:40:08

2 A No, I did not. 13:40:11

3 Q Okay. Do you recall the e-mail exchanges 13:40:12

4 that occurred between you and Mr. Mull in or around 13:40:17

5 August 30th that's reflected in this document? 13:40:23

6 A Yes, I do. 13:40:25

7 Q Okay. And can you tell me what -- what 13:40:26

8 your recollection is about the exchanges and what 13:40:29

9 led to having these e-mail exchanges. 13:40:31

10 A I -- my memory from this time period is, I 13:40:34

11 was away. I -- I think -- I apologize, I don't 13:40:42

12 remember, I think I mentioned this earlier. But I 13:40:46

13 took a vacation when I was pregnant, and I was out 13:40:48

14 of the country during this time period. The 13:40:52

15 Secretary was also taking a short -- a brief 13:40:54

16 vacation with her family at a rental house. 13:40:58

17 And there -- and she was having 13:41:02

18 communications issues, and the department was made 13:41:08

19 aware of it. Cheryl and Steve. 13:41:12

20 Q Okay. When you say "Cheryl," is that 13:41:15

21 Cheryl Mills? 13:41:18

22 A Cheryl Mills and Steve Mull. 13:41:19

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1	Q	Okay. Thank you.	13:41:20
2		If you can turn to Page 2 --	13:41:28
3	A	Yes.	13:41:31
4	Q	-- of the document, the e-mail from	13:41:31
5		Mr. Mull to Cheryl Mills, where Mr. Mull discusses	13:41:33
6		possibly preparing two versions of a BlackBerry for	13:41:46
7		the Secretary to use, one with a State Department	13:41:51
8		e-mail account and one with -- that would just have	13:41:54
9		her phone and Internet capability.	13:41:59
10		Do you remember that exchange?	13:42:01
11	A	My memory has been refreshed, having read	13:42:04
12		the exchange, yes.	13:42:06
13	Q	Okay. And do you recall why did Mr. Mull	13:42:07
14		suggest having these two separate BlackBerrys for	13:42:14
15		the Secretary to use?	13:42:17
16		MR. BRILLE: Objection. Form.	13:42:19
17		Go ahead, you can --	13:42:21
18		MS. WOLVERTON: Same objection.	13:42:22
19	A	I think -- I think everybody from the	13:42:23
20		State Department who was aware of the fact that she	13:42:25
21		was having communications challenges was trying to	13:42:27
22		provide solutions to fix the communications issues	13:42:31

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1	she was having.	13:42:34
2	Q And did Secretary Clinton agree to have	13:42:35
3	two separate BlackBerrys as a result?	13:42:42
4	MS. WOLVERTON: Objection. Lack of	13:42:46
5	foundation.	13:42:47
6	A Not that I am aware of. I -- I don't	13:42:48
7	remember discussing this with the Secretary in the	13:42:50
8	time.	13:42:52
9	Q Okay. Do you recall discussing this with	13:42:52
10	Cheryl Mills at that time?	13:42:55
11	A No. I -- no, I actually don't.	13:42:58
12	Q Do you recall discussing it with anybody	13:43:02
13	else, including Patrick Kennedy or Monica Hanley?	13:43:04
14	A I remember this exchange. I don't	13:43:08
15	remember any conversations, phone conversations,	13:43:11
16	outside of this exchange.	13:43:13
17	Q And do you see the second -- well, the	13:43:14
18	first sentence of that last paragraph there reads --	13:43:24
19	I'm on the second page of the document.	13:43:28
20	A Oh, yes.	13:43:31
21	Q "Separately we are working to provide the	13:43:32
22	Secretary per her request a department-issued	13:43:33

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1	BlackBerry to replace her personal unit, which is	13:43:36
2	malfunctioning." And in paren, parentheses,	13:43:41
3	"possibly because of her personal e-mail server is	13:43:45
4	down."	13:43:47
5	Do you see that?	13:43:48
6	A Yes, I do.	13:43:50
7	Q Do you know how Mr. Mull knew that	13:43:51
8	Secretary Clinton had a personal e-mail server?	13:43:56
9	A I don't know.	13:44:01
10	Q Did you ever tell Mr. Mull that Secretary	13:44:03
11	had a personal e-mail server?	13:44:14
12	A Not that -- not that I recall. Not --	13:44:18
13	that language isn't language I would have -- I would	13:44:23
14	have been familiar using, so, no.	13:44:27
15	Q Did you ever inform Mr. Mull that	13:44:28
16	Secretary Clinton's residence housed a server in New	13:44:35
17	York --	13:44:35
18	A No.	13:44:41
19	Q -- for her e-mail?	13:44:41
20	And also on the same -- in the same	13:44:46
21	sentence.	13:44:48
22	A Yes.	13:44:49

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1	Q	He writes, "We're working to provide the	13:44:49
2		Secretary per her request a department-issued	13:44:52
3		BlackBerry."	13:44:55
4		Did the Secretary request a	13:44:57
5		department-issued BlackBerry, as far as you know?	13:45:00
6	A	I don't know.	13:45:02
7	Q	Do you know if anybody made it -- such a	13:45:03
8		request on the Secretary's behalf?	13:45:07
9	A	I wasn't involved in the conversations. I	13:45:09
10		don't know who would have made that request on her	13:45:12
11		behalf, I'm sorry.	13:45:14
12	Q	And then in the second sentence of that	13:45:16
13		same paragraph.	13:45:20
14	A	Yes.	13:45:21
15	Q	And the statement that's in the	13:45:21
16		parentheses, "which would mask her identity, but	13:45:28
17		which would able -- also be subject to FOIA	13:45:32
18		requests."	13:45:35
19		Do you see that?	13:45:35
20	A	Yes, I do.	13:45:36
21	Q	Okay. Do you know why Mr. Mull wrote	13:45:37
22		that, that the e-mail account would be subject to	13:45:44

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1	FOIA requests?	13:45:47
2	A I -- I can't speak to why he wrote that.	13:45:50
3	Q Going -- was the usage of Secretary	13:45:52
4	Clinton's e-mail discussed with Mr. Mull in	13:46:26
5	connection to them being -- the e-mails being	13:46:33
6	subject to FOIA requests, if you know?	13:46:36
7	MS. WOLVERTON: Objection. Vague.	13:46:39
8	A Not that I'm aware of.	13:46:42
9	Q All right. And I just want to go back up	13:46:43
10	to, again, the language in the first parentheses,	13:46:45
11	"possibly because of her personal e-mail server is	13:46:49
12	down."	13:46:51
13	Did you -- did you inform Mr. Mull about a	13:46:52
14	personal e-mail account being down for the	13:46:56
15	Secretary?	13:46:59
16	A I don't -- I don't recall, and I don't	13:47:00
17	believe I did. I wasn't -- I wasn't there. I was	13:47:03
18	out of the country in this specific instance.	13:47:05
19	Q Do you know if Cheryl Mills informed	13:47:08
20	Mr. Mull about a personal e-mail account for	13:47:12
21	Secretary Clinton being down during this time frame?	13:47:14
22	A I don't. I don't know.	13:47:21

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1	Q	Did you ever inform Mr. Mull about	13:47:24
2		Secretary Clinton's e-mail account on the	13:47:47
3		Clintonemail.com server?	13:47:50
4	MR. BRILLE:	Objection. Asked and	13:47:52
5		answered.	13:47:54
6		But, go ahead.	13:47:54
7	A	I don't remember informing him, but her	13:47:56
8		e-mail account was not -- was not a secret in our --	13:47:59
9		in the department, and with senior members of the	13:48:04
10		State Department, so. But I don't remember	13:48:08
11		informing him myself, no.	13:48:10
12	Q	Do you recall any discussions you had with	13:48:11
13		Mr. Mull about Secretary Clinton's e-mail account	13:48:19
14		being down?	13:48:23
15	MR. BRILLE:	Objection. Asked and	13:48:25
16		answered.	13:48:26
17		Go ahead.	13:48:27
18	A	I remember -- I remember this exchange. I	13:48:27
19		remember this -- this instance. It was a hurricane.	13:48:29
20		I remember not being there. I remember being on	13:48:33
21		this e-mail chain. I don't remember any	13:48:35
22		conversations outside she was experiencing issues,	13:48:38

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1	we were all trying to find a solution.	13:48:43
2	Q All right. And then I'll point you to the	13:48:44
3	last sentence of that paragraph --	13:48:46
4	A Yes.	13:48:50
5	Q -- where it says, "We're working with	13:48:50
6	Monica to hammer out the details of what will best	13:48:50
7	meet the Secretary's needs."	13:48:52
8	Do you see that?	13:48:54
9	A Yes, I see that.	13:48:55
10	Q Okay. Is that Monica Hanley?	13:48:56
11	A Yes, that's right.	13:48:58
12	Q Okay. On the first page of the document,	13:48:59
13	I want to talk about your e-mail to Mr. Mull and	13:49:17
14	Cheryl Mills on August 30th, 2011.	13:49:21
15	A Yes.	13:49:24
16	Q You write, "Steve, let's discuss the State	13:49:24
17	BlackBerry. Doesn't make a whole lot of sense."	13:49:30
18	Do you see that?	13:49:31
19	A I see that.	13:49:32
20	Q Okay. Do you recall that e-mail exchange?	13:49:33
21	A My -- yes. My memory has been refreshed	13:49:35
22	now that I've read this e-mail.	13:49:37

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1 Q All right. And what do you recall 13:49:39
2 about -- about that e-mail? 13:49:43
3 A What is written -- 13:49:47
4 MR. BRILLE: Yeah. Do you mean the 13:49:49
5 sentence or the e-mail or -- 13:49:50
6 Q No. About the discussion with respect to 13:49:52
7 the State BlackBerry not making a whole lot of 13:49:54
8 sense. 13:49:57
9 MR. BRILLE: Okay. 13:49:57
10 A I -- I didn't think that the solution made 13:49:57
11 a whole lot of sense, given the issues. 13:50:00
12 Q Why didn't you think the solution made a 13:50:02
13 whole lot of sense, given the issues? 13:50:05
14 A We were in the middle of a hurricane. My 13:50:07
15 memory is it was Hurricane Irene, that phone 13:50:08
16 systems, phone lines, were completely down. That 13:50:13
17 she couldn't have calls connected. 13:50:15
18 I remember that the White House was having 13:50:18
19 challenges, as I think I noted here, too. There 13:50:21
20 were generally communication issues that were pretty 13:50:24
21 widespread in New York at the time. 13:50:27
22 I knew at the time that her preference was 13:50:28

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1 to carry one device. So not -- adding not just one 13:50:30
2 but two additional devices seemed quite a 13:50:34
3 complicated solution for a matter that would be 13:50:36
4 resolved once connectivity was restored and once the 13:50:39
5 phone lines were up and systems were back up and 13:50:44
6 running. Adding two additional devices to something 13:50:46
7 that was going to be corrected didn't seem to make a 13:50:49
8 lot of sense to me. 13:50:53
9 Q Why were there -- would there be two 13:50:53
10 additional devices added? 13:50:55
11 A Steve -- if you look at Steve's e-mail, it 13:50:57
12 says, We'll prepare two versions for her to use, one 13:50:59
13 with an operating State Department e-mail account, 13:51:04
14 and another would just have a phone and Internet 13:51:06
15 capability. So that would go from carrying one 13:51:09
16 device to carrying three devices. And that is what 13:51:13
17 I would be responding to in that line. 13:51:16
18 Q And then the top e-mail that you sent to 13:51:17
19 Steve Mull on August 30th, you say, "It's pretty 13:51:32
20 silly and she knows it," on the first page of the 13:51:34
21 document? 13:51:38
22 A Yes. 13:51:39

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1	Q	Do you see that?	13:51:39
2	A	Yes.	13:51:40
3	Q	What did you mean -- what did you mean as	13:51:40
4		being pretty silly? What were you referring to?	13:51:43
5	A	The notion that we were having all of	13:51:45
6		these challenges getting calls connected and e-mails	13:51:47
7		through and not being able to have the comms team	13:51:51
8		connect a call. And we were in a hurricane. So not	13:51:57
9		understanding why you're not getting calls, why	13:52:02
10		anyone isn't getting calls is we're -- we're in a	13:52:04
11		hurricane.	13:52:07
12		So when this issue is resolved for	13:52:09
13		everybody who is having connectivity issues, we --	13:52:11
14		we would be able to be back to business. But this	13:52:14
15		was a unique situation that provide -- that	13:52:16
16		prevented a normal form of communications from	13:52:19
17		taking place.	13:52:23
18		And that included hard lines, as I'm sure	13:52:24
19		you've noted in this exchange, as well.	13:52:26
20	Q	So this is unique to the issues that you	13:52:28
21		and the Secretary experienced with your Clinton	13:52:35
22		e-mail accounts to deliver to State.gov e-mail	13:52:39

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1	accounts --	13:52:42
2	MS. WOLVERTON: Objection.	13:52:44
3	Q -- that we talked about earlier today?	13:52:44
4	MR. BRILLE: Objection.	13:52:46
5	MS. WOLVERTON: Objection. Vague.	13:52:46
6	MR. BRILLE: Objection. Vague, misstates	13:52:47
7	the testimony, and lacks foundation.	13:52:50
8	You can go ahead and answer.	13:52:52
9	A I -- I don't agree with the	13:52:53
10	characterization.	13:52:55
11	This also related to hard lines. These	13:52:58
12	were calls being transferred on hard lines, that's	13:53:02
13	why the communications team was onsite.	13:53:05
14	And previously, as I had testified, it was	13:53:10
15	not just lack of e-mails going through on Clinton	13:53:12
16	e-mail; it was State.gov e-mails going to outside	13:53:15
17	e-mail accounts. And so that wasn't just Clinton	13:53:20
18	e-mail. In one instance it was a house -- a	13:53:23
19	House.gov account.	13:53:29
20	Q Okay. And just so we're on the same page,	13:53:30
21	my focus when we were talking about communication	13:53:35
22	issues the Secretary was having, or you were having,	13:53:38

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1	I'm referring to e-mail communications, not	13:53:40
2	telephone communications.	13:53:44
3	A Oh, okay.	13:53:45
4	Q Just --	13:53:45
5	A I was just --	13:53:47
6	Q So it's easy.	13:53:47
7	A I understand.	13:53:48
8	MR. BRILLE: Okay.	13:53:49
9	A I understand.	13:53:50
10	MS. BERMAN: Ramona, if you could keep	13:53:54
11	your voice up. I can't hear you.	13:53:56
12	MS. COTCA: Must be the air blowing.	13:53:58
13	Q Thank you.	13:54:03
14	A Okay. Thank you.	13:54:05
15	MS. COTCA: Please mark this as Exhibit	13:54:14
16	10.	13:54:16
17	(Abedin Deposition Exhibit 10 marked for	13:54:16
18	identification and is attached to the transcript.)	13:54:31
19	Q And, Ms. Abedin, please review what's been	13:54:31
20	marked as Exhibit 10 and let me know once you've had	13:54:32
21	a chance to review it.	13:54:35
22	A Yes.	13:54:57

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1	Q	Okay. Thank you.	13:54:57
2		Prior to today, have you seen this	13:55:00
3		document before?	13:55:01
4	A	Yes, I have.	13:55:02
5	Q	And is that during conversations or	13:55:02
6		communications that you had with your attorneys in	13:55:05
7		preparation for today's deposition?	13:55:07
8	A	That's correct.	13:55:09
9	Q	Okay. Did you discuss the substance of	13:55:09
10		the subject matter in this exhibit with anybody	13:55:13
11		other than your attorneys?	13:55:15
12		MR. BRILLE: Oh, sorry.	13:55:16
13	A	No, I have not.	13:55:18
14	Q	Do you recall, after reviewing this	13:55:19
15		document, do you recall this e-mail exchange you had	13:55:27
16		with Secretary Clinton on November 13, 2010?	13:55:29
17	A	I -- I -- I didn't recall the -- the	13:55:35
18		instance, but I -- I have -- I have now -- I now	13:55:39
19		recall the -- or I'm now reading the e-mail, yes.	13:55:43
20	Q	Is -- does the document refresh your	13:55:48
21		recollection about the e-mail exchange you had with	13:55:52
22		Secretary Clinton?	13:55:54

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1	A	I remember there being instances where we	13:55:57
2		had, you know, communications issues. This appears	13:55:59
3		to be one of those instances.	13:56:03
4	Q	Okay. I'd like to point you to the second	13:56:04
5		e-mail from the top on this document, from you to	13:56:19
6		Secretary Clinton, November 13, 2010, where you	13:56:23
7		state, "We should talk about putting you on State	13:56:28
8		e-mail and releasing your e-mail address to the	13:56:30
9		department so you are not going to spam."	13:56:32
10		Do you see that?	13:56:36
11	MR. BRILLE:	I would -- I would simply	13:56:37
12		note, I think you misread the sentence. You	13:56:38
13		substituted "and" for "or." But I will just note	13:56:40
14		for the record, I think you misread it.	13:56:45
15	MS. COTCA:	Okay. Let me -- let me try	13:56:47
16		that again. Thank you.	13:56:49
17	Q	"We should talk about putting you on State	13:56:50
18		e-mail or releasing your e-mail address to the	13:56:52
19		department so you are not going to spam."	13:56:55
20		Did I read that correctly?	13:57:00
21	A	Yes. Yes, you did.	13:57:01
22	Q	Okay. Thank you.	13:57:02

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1	A	Yes, ma'am.	13:57:03
2	Q	Do you recall this exchange with Secretary	13:57:03
3		Clinton where you advised her about talking about	13:57:07
4		putting her on a State e-mail?	13:57:13
5	A	I -- I remember looking for solutions	13:57:17
6		whenever there were challenges with our	13:57:21
7		communications. I didn't -- I didn't remember this	13:57:25
8		particular note to her. But this e-mail obviously	13:57:27
9		states that, yes.	13:57:31
10	Q	And when you say you were looking for	13:57:32
11		solutions to resolve the issues, where were you	13:57:34
12		looking for solutions?	13:57:37
13	A	As is stated in the e-mail.	13:57:40
14	Q	Well, did you discuss this potential	13:57:42
15		solution with anybody?	13:57:44
16	A	I don't remember.	13:57:46
17	Q	Do you recall who would have recommended	13:57:47
18		this potential -- possible solution?	13:57:49
19		MR. BRILLE: Objection. Foundation.	13:57:53
20		Go ahead.	13:57:55
21		MS. WOLVERTON: Same objection.	13:57:56
22	A	I think it appears that I was recommending	13:57:57

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1 the solution, just looking at the e-mail. 13:57:59

2 Q I'm not asking you just what the e-mail 13:58:01

3 states; I'm asking you based on your recollection. 13:58:07

4 A Yeah. 13:58:10

5 Q Do you recall anybody recommending to you 13:58:10

6 as a possible solution to putting the Secretary on a 13:58:13

7 State e-mail during this time frame? 13:58:18

8 A No. 13:58:22

9 Q How about -- and again, based on your 13:58:22

10 recollection, not what the document states, do you 13:58:30

11 recall anybody recommending as a possible solution 13:58:34

12 to releasing Secretary Clinton's e-mail address to 13:58:39

13 the department so that her e-mail is not going to 13:58:43

14 spam? 13:58:47

15 A No. 13:58:48

16 Q When you wrote "releasing your e-mail 13:58:50

17 address to the department," can you explain what you 13:59:00

18 meant by that? 13:59:04

19 A So let me just give you some context of 13:59:12

20 how I would have experienced a situation like this. 13:59:14

21 Her initial e-mail was about a phone call 13:59:19

22 with a foreign -- a foreign foreign minister, which 13:59:22

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1 she missed and missed the call because she never got 13:59:27
2 the -- I never got her e-mail suggests -- giving us 13:59:30
3 the signoff to do it. So she wasn't able to do her 13:59:40
4 job, do what she needed to do. 13:59:43
5 My response would have been, Here are some 13:59:45
6 suggestions. I cannot tell you if I called somebody 13:59:47
7 else. I don't remember calling anybody else. Or if 13:59:50
8 I on my own said, Here are some solutions so that 13:59:53
9 your e-mails get through to us so that we can place 13:59:57
10 call -- calls to foreign officials. 14:00:01
11 And, you know, she clearly missed the 14:00:05
12 window in this exchange. 14:00:06
13 Q Okay. And what did you mean by, 14:00:11
14 "releasing your e-mail address to the department"? 14:00:13
15 A I'm not sure I would know how to define 14:00:21
16 that then or define that now. I might have also 14:00:23
17 just be my -- my being frustrated back at the fact 14:00:28
18 that I wasn't getting her messages. 14:00:30
19 If you -- just reading the exchange, she 14:00:32
20 seems frustrated because she's not able to do her 14:00:35
21 job. I seem frustrated back because I'm not -- so 14:00:38
22 I -- I couldn't define to you exactly what that 14:00:43

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1	meant, but ...	14:00:48
2	Q I'm not asking for an exact definition of	14:00:50
3	what that meant.	14:00:52
4	A Yeah.	14:00:53
5	Q But looking at it today and reflecting	14:00:53
6	back on the exchange you had at that time, if you're	14:00:56
7	able to say what you intended to mean by that	14:01:01
8	statement with respect to releasing her e-mail	14:01:04
9	address to the department.	14:01:07
10	A I couldn't tell you.	14:01:10
11	Q Do you recall any discussions with	14:01:13
12	Secretary Clinton, other than this e-mail exchange,	14:01:20
13	about releasing Secretary Clinton's e-mail address	14:01:24
14	to the department?	14:01:27
15	A No.	14:01:28
16	Q All right. And what is your recollection	14:01:28
17	with respect to Secretary Clinton's response to the	14:01:36
18	two recommendations or suggestions that you	14:01:42
19	provided?	14:01:47
20	A I don't -- I don't remember having a	14:01:48
21	conversation outside this e-mail exchange.	14:01:49
22	Q But again, I want to put the document	14:01:52

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1	away, and I want to focus on what your recollection	14:01:55
2	is --	14:01:57
3	A Okay.	14:01:58
4	Q -- with respect to how the Secretary	14:01:59
5	responded to the two suggestions that you made.	14:02:01
6	MR. BRILLE: Objection. That was just	14:02:06
7	asked and answered. She said, I don't recall	14:02:07
8	anything outside the -- the e-mail.	14:02:09
9	So I'm just saying, if you have a	14:02:12
10	different question, that's ...	14:02:14
11	MS. WOLVERTON: Same objection.	14:02:15
12	Q Okay. I -- I understood that the document	14:02:16
13	refreshed your recollection with respect to the	14:02:19
14	e-mail exchange --	14:02:22
15	A Yes.	14:02:23
16	Q -- that occurred in November 13, 2010,	14:02:23
17	between you and Secretary Clinton. Is that right?	14:02:26
18	A That's correct.	14:02:28
19	Q Okay. So I want to ask you about the	14:02:28
20	memory that has been refreshed, your memory that's	14:02:31
21	been refreshed about the e-mail exchange.	14:02:34
22	A Yes.	14:02:36

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1	Q	So in response to the two recommendations	14:02:36
2		that you made to the Secretary -- to Secretary	14:02:40
3		Clinton, what do you recall with respect to how she	14:02:42
4		responded to those recommendations?	14:02:46
5	A	I -- I don't recall any -- any response	14:02:49
6		other than once the system was back up and running,	14:02:53
7		that it was -- we just proceeded with business the	14:02:58
8		way it was before.	14:03:01
9	Q	Okay. So just so I understand, the only	14:03:02
10		thing you recall is that the Secretary responded	14:03:07
11		back by e-mail to you.	14:03:09
12	A	Yes.	14:03:10
13	Q	Is that your testimony?	14:03:10
14	A	That's correct.	14:03:12
15	Q	Thank you.	14:03:12
16	A	That's correct.	14:03:14
17	Q	All right. And Secretary Clinton wrote to	14:03:14
18		you on November 13, 2010, "Let's get separate	14:03:21
19		address or device, but I don't want any risk of the	14:03:26
20		personal being accessible."	14:03:29
21		Do you see that?	14:03:30
22	A	I do.	14:03:32

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1	Q	Okay. Did you discuss with Secretary	14:03:32
2		Clinton her not wanting a separate -- or her not	14:03:42
3		wanting any risk of personal being accessible?	14:03:45
4	A	I don't recall talking to her about it	14:03:50
5		outside of reading it in this e-mail.	14:03:51
6	Q	Okay. Do you know why Secretary Clinton	14:03:53
7		didn't want any risk of her personal e-mail being	14:03:56
8		accessible?	14:03:59
9		MR. BRILLE: Objection.	14:04:01
10		MS. WOLVERTON: Objection.	14:04:02
11		MR. BRILLE: Form and foundation.	14:04:02
12	A	I -- I understand this to her not wanting	14:04:05
13		her private -- her private personal e-mails being	14:04:08
14		accessible.	14:04:13
15	Q	To whom?	14:04:14
16	A	To anybody.	14:04:17
17	Q	We're talking about her work at the State	14:04:20
18		Department. Right?	14:04:22
19		MR. BRILLE: Objection to form.	14:04:23
20	Q	Isn't this discussion with respect to her	14:04:27
21		use of the e-mail for State Department work?	14:04:29
22		MR. BRILLE: Same objection.	14:04:33

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1	A	Which discussion?	14:04:36
2	Q	This e-mail exchange with respect to --	14:04:37
3		when you recommended releasing your e-mail address	14:04:40
4		to the department.	14:04:42
5	A	Yes.	14:04:43
6	Q	For example, what department were you	14:04:43
7		referring to?	14:04:46
8	A	It would -- it would have been the --	14:04:47
9		our -- her department.	14:04:50
10	Q	And which is that?	14:04:51
11	A	At the State Department.	14:04:52
12	Q	Thank you. All right.	14:04:53
13		So for the State Department, if you know,	14:04:57
14		why did Secretary Clinton not want any risk of her	14:05:04
15		personal e-mail being accessed?	14:05:07
16		MS. WOLVERTON: Objection. Foundation.	14:05:11
17		Vague.	14:05:12
18		MR. BRILLE: And asked and answered.	14:05:13
19		You can --	14:05:14
20	A	I understand that as any personal e-mails	14:05:15
21		not being accessible to anybody; to the public or	14:05:20
22		just like anybody who has personal e-mail would want	14:05:25

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1	to keep their personal e-mail private.	14:05:28
2	Q Okay. But again, we're talking about with	14:05:30
3	respect to Secretary Clinton's work at the State	14:05:32
4	Department. She used this e-mail account --	14:05:35
5	A Yes.	14:05:37
6	Q -- for her State Department work.	14:05:37
7	Correct?	14:05:39
8	A In addition to her personal, that is	14:05:40
9	correct.	14:05:42
10	Q Correct.	14:05:42
11	A Yes.	14:05:43
12	Q But this is the only e-mail account that	14:05:43
13	she used for her State Department work.	14:05:45
14	Is that right?	14:05:48
15	A That's right.	14:05:48
16	Q Okay. So with respect to her e-mail that	14:05:49
17	she used for her State Department work --	14:05:54
18	A Yes.	14:05:57
19	Q -- do you know why Secretary Clinton	14:05:58
20	didn't want to risk any of her personal e-mail	14:06:00
21	account being accessible while at the State	14:06:04
22	Department?	14:06:08

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1	MS. WOLVERTON: Objection.	14:06:08
2	MR. BRILLE: Objection. Form, foundation.	14:06:09
3	Misstates the document. And --	14:06:10
4	MS. WOLVERTON: Same. Same objections.	14:06:13
5	A I -- I read -- I read that line exactly	14:06:15
6	the way she wrote it, which is, let's get a separate	14:06:20
7	address. There was no resistance to getting a	14:06:23
8	separate e-mail address, as I'm reading it in this	14:06:26
9	document. And not wanting her personal e-mails to	14:06:29
10	be accessible to the public.	14:06:33
11	Q To the public.	14:06:34
12	A To -- personal e-mails being accessible to	14:06:36
13	anybody. Just like you wouldn't -- I would imagine	14:06:41
14	anybody who has personal e-mail doesn't want that	14:06:44
15	personal e-mail to be read by anybody else. I --	14:06:46
16	I -- I read it the same way as she has written it.	14:06:51
17	Q How do you read -- when -- how do you read	14:06:54
18	the personal being accessible? Is that -- do you	14:07:06
19	read that as referring to Secretary Clinton's	14:07:09
20	personal account or an individual e-mail?	14:07:12
21	MR. BRILLE: Objection to form. Asked and	14:07:17
22	answered.	14:07:20

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1	A	I -- I -- I read that as any personal	14:07:21
2		e-mails being accessible.	14:07:25
3	Q	So individual e-mails on Secretary	14:07:31
4		Clinton's account.	14:07:35
5	A	Yes.	14:07:36
6	Q	Is that fair?	14:07:36
7	A	Yes. It's all this -- most of her State	14:07:37
8		e-mails were being sent to State.gov addresses, they	14:07:41
9		were going into the system.	14:07:45
10	Q	Do you know if that's what Secretary	14:07:46
11		Clinton meant?	14:07:48
12		MR. BRILLE: Object.	14:07:49
13	A	I -- I don't know. I don't know.	14:07:50
14	Q	We would have to ask her to know; wouldn't	14:07:52
15		we?	14:07:56
16		MR. BRILLE: Objection to form.	14:07:57
17		Foundation.	14:07:58
18		MS. WOLVERTON: Same objection.	14:07:59
19	A	I don't know. I -- I don't -- I don't	14:08:00
20		know.	14:08:05
21	Q	And was a separate address or device	14:08:05
22		provided to Secretary Clinton after she wrote that	14:08:11

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1	to you on November 13, 2010?	14:08:14
2	A There was not.	14:08:17
3	Q Why not?	14:08:17
4	A As had happened in other instances, the	14:08:21
5	matter resolved itself, or was resolved, and we went	14:08:23
6	back to the -- the prior practice.	14:08:28
7	Q Do you know how the matter was resolved?	14:08:30
8	A I don't remember in this specific	14:08:33
9	instance.	14:08:35
10	Q Okay. We're done with that document.	14:08:36
11	A Thank you.	14:08:44
12	MR. BRILLE: I would just ask how much	14:08:44
13	longer. I need a break. I could use a break.	14:08:46
14	MS. COTCA: Sure.	14:08:48
15	MR. BRILLE: Do you want to take five?	14:08:49
16	MS. COTCA: Sure.	14:08:50
17	MR. BRILLE: Okay.	14:08:51
18	VIDEO SPECIALIST: We are off the record	14:08:51
19	at 14:08.	14:08:53
20	(A recess was taken.)	14:08:55
21	VIDEO SPECIALIST: We are back on the	14:18:26
22	record at 14:18.	14:18:27

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1	BY MS. COTCA:	14:18:28
2	Q Ms. Abedin, before moving on, I just have	14:18:29
3	another followup question with respect to your	14:18:32
4	testimony about the Secretary not wanting her	14:18:36
5	personal e-mail to be accessible to the public.	14:18:38
6	How would they be accessible to the	14:18:42
7	public?	14:18:45
8	MR. BRILLE: Objection. Foundation, form.	14:18:45
9	MS. WOLVERTON: Same objections.	14:18:49
10	A I -- as I had stated, I read that as she	14:18:50
11	not wanting her personal e-mail to be accessible by	14:18:55
12	anyone. Just like I would not want my personal	14:18:58
13	e-mail to be read by anybody else, I interpreted	14:19:02
14	that for her, as well.	14:19:11
15	Q Did the Secretary not want her personal	14:19:13
16	e-mail account to be accessible pursuant to FOIA?	14:19:15
17	MR. BRILLE: Objection. Asked and	14:19:23
18	answered.	14:19:23
19	A I absolutely do not believe that, no.	14:19:25
20	MS. COTCA: Can you mark this as Exhibit	14:19:42
21	11.	14:19:44
22	(Abedin Deposition Exhibit 11 marked for	14:19:44

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1	identification and is attached to the transcript.)	14:19:57
2	Q And, Ms. Abedin, I would ask if you could	14:19:57
3	please review what's been marked as Exhibit 11 and	14:19:59
4	let me know once you've had a chance to review it.	14:20:01
5	Are you all set?	14:20:28
6	A Yes.	14:20:28
7	Q Thank you.	14:20:28
8	Prior to today's deposition, did you	14:20:30
9	review this document?	14:20:31
10	A Yes.	14:20:34
11	Q Okay. And is that during your course of	14:20:34
12	discussions with your attorney in preparation for	14:20:37
13	the deposition today?	14:20:39
14	A Yes.	14:20:40
15	Q Okay. Did you discuss this document or	14:20:40
16	the substance of the exchange reflected in the	14:20:43
17	document with anybody other than your attorneys?	14:20:48
18	A No, I did not.	14:20:51
19	Q Okay. Do you recall the e-mail exchange	14:20:52
20	that you had with Secretary Clinton and Lauren	14:20:57
21	Jiloty on March 22nd about designing a system that	14:21:02
22	the Secretary wanted with respect to her personal	14:21:07

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1 and official files? 14:21:09

2 A Yes. I remember conversations we were 14:21:11

3 having during the transition of how to -- how to 14:21:14

4 manage the paper. 14:21:17

5 Q Okay. And the conversations that you 14:21:18

6 recall, are those independent of what's reflected in 14:21:23

7 the document? 14:21:26

8 A Yes. 14:21:27

9 Q Okay. Can you first tell me about the 14:21:28

10 conversations that you recall with respect to the 14:21:30

11 system. 14:21:34

12 A Generally understanding from our -- the 14:21:34

13 career State Department employees about how the 14:21:38

14 paper that went in to the Secretary, official State 14:21:41

15 Department materials that went in -- in to the 14:21:45

16 Secretary, how those were handled coming out, and 14:21:47

17 versus personal things that may have come out and 14:21:51

18 how those could be maintained. 14:21:54

19 Q What do you mean by "coming out"? 14:21:55

20 A When they were in her out -- the 14:21:58

21 Secretary's Outbox. So it went into her Inbox, and 14:21:59

22 what came out of her Inbox, and I think -- and that 14:22:03

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1 is what she's referring to here. 14:22:06

2 Q So what is being referred to in this 14:22:07

3 document, does it refer to only hard paper -- 14:22:08

4 hard-copy documents? 14:22:15

5 MS. WOLVERTON: Objection. The document 14:22:16

6 speaks for itself. 14:22:17

7 A Yes. That is how I read this document. 14:22:19

8 Q Okay. And what is the system that the 14:22:21

9 Secretary wanted and designed with respect to 14:22:28

10 managing her personal and official files? 14:22:29

11 MS. WOLVERTON: Objection. Foundation. 14:22:33

12 Also, this extends beyond the scope of authorized 14:22:34

13 discovery. 14:22:37

14 MR. BRILLE: Same objections, but you can 14:22:39

15 answer. 14:22:41

16 A I think -- it was a matter of 14:22:41

17 understanding what the system was, the process was 14:22:43

18 in place. We were coming in to an existing system, 14:22:47

19 and how that paper flow worked and how things were 14:22:51

20 filed when she sent them out. 14:22:54

21 And, likewise, things that were coming in 14:22:56

22 that might be personal, if there was a news article 14:22:58

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1 that she saw that she was interested in, she -- she 14:23:01
2 would put it in her Outbox. Trying to understand 14:23:05
3 where all those things went. 14:23:07
4 We would go overseas, there would be menus 14:23:09
5 from official State dinners. Where does that go. 14:23:12
6 Just trying to understand where items were -- where 14:23:14
7 paper items were filed when she put them in her 14:23:17
8 Outbox. 14:23:20
9 Q Okay. With respect to the system, were 14:23:20
10 there any e-mails that would be printed and would be 14:23:23
11 filed? And I'm referring to her State Department 14:23:26
12 work e-mails. 14:23:33
13 A Not that I remember. 14:23:36
14 Q And is this -- this is something you 14:23:42
15 worked on with Lauren Jiloty? Is that right? 14:23:57
16 A It was something that all of us who were 14:24:00
17 new to the department were -- in her immediate 14:24:01
18 office, her assistants, were learning how to -- how 14:24:04
19 to -- how to manage the paper properly. 14:24:09
20 Q Thank you. 14:24:12
21 A Thank you. 14:24:22
22 Q Moving on to the end of your employment at 14:24:23

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1	the State Department and afterwards.	14:24:27
2	Did you discuss with Cheryl Mills or have	14:24:30
3	any exchanges with Cheryl Mills about the setup of	14:24:33
4	the server?	14:24:38
5	A The setup of the Clinton server?	14:24:49
6	Q Correct.	14:24:51
7	A Not that I remember with Cheryl, no.	14:24:52
8	Q Okay. Who did you discuss the setup of	14:24:53
9	the server after you left the State Department?	14:25:00
10	MS. WOLVERTON: Objection. Lack of	14:25:04
11	foundation.	14:25:06
12	MR. BRILLE: Objection. Foundation.	14:25:06
13	A I -- the awareness of the server and the	14:25:08
14	presence was something I experienced reading in some	14:25:11
15	news articles about a year, a year-and-a-half ago,	14:25:14
16	when it was -- it was being publicly discussed.	14:25:18
17	Q Are you aware of any discussions that	14:25:21
18	Ms. Mills had with Bryan Pagliano about the setup of	14:25:27
19	the server? And for that time frame, it's after she	14:25:32
20	had left the State Department.	14:25:35
21	A No, I'm not.	14:25:38
22	Q Since leaving the State Department, have	14:25:40

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1	you had any contact with Bryan Pagliano about the	14:25:45
2	Clintonemail.com system or the Clinton server?	14:25:53
3	A No, I have not.	14:25:57
4	Q Okay. How about with Justin Cooper?	14:25:58
5	A I saw Justin at a -- a wedding about three	14:26:04
6	weeks ago, but I did not have a discussion with him	14:26:06
7	about this at all.	14:26:11
8	Q Okay. And other than seeing him at the	14:26:12
9	wedding, did you have any discussions since leaving	14:26:14
10	the State Department with Mr. Cooper about the	14:26:18
11	Clinton server or the e-mail system?	14:26:20
12	MS. WOLVERTON: Objection. Misstates	14:26:23
13	prior testimony.	14:26:24
14	A No.	14:26:25
15	Q How about Heather Samuelson; do you know	14:26:25
16	Ms. Samuelson?	14:26:32
17	A I do know Heather.	14:26:33
18	Q Okay. And how do you know Ms. Samuelson?	14:26:34
19	A We worked together at the State Department	14:26:37
20	and prior to that in -- in the Clinton campaign, the	14:26:40
21	2008 Clinton campaign.	14:26:45
22	Q The presidential Clinton campaign.	14:26:47

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1	Correct?	14:26:49
2	A The presidential Clinton campaign, yes.	14:26:49
3	Q Okay. And what was Ms. Samuelson's	14:26:51
4	position at the State Department during your tenure	14:26:55
5	there?	14:26:57
6	A She was -- she was an attorney -- she	14:26:57
7	was -- she is an attorney. And at State Heather --	14:27:00
8	I believe Heather worked in the counselor's office.	14:27:12
9	Q And on what, if any, work-related matters	14:27:18
10	did you exchange with Ms. Samuelson during your	14:27:21
11	tenure at the State Department?	14:27:24
12	MR. BRILLE: Objection. Vague.	14:27:27
13	A And my memory is vague. I -- potentially	14:27:31
14	personnel, bringing on new staff, is what I -- I	14:27:35
15	don't -- I don't -- I don't remember much	14:27:38
16	professional interaction with Heather at the State	14:27:42
17	Department.	14:27:44
18	Q Did you interact with Ms. Samuelson at the	14:27:44
19	State Department for Mr. Pagliano to come onboard to	14:27:48
20	the State Department in 2009?	14:27:53
21	A Not that I -- no, I don't remember that.	14:27:56
22	Q Since leaving the State Department, have	14:27:57

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1	you had any contact or communications with	14:28:02
2	Ms. Samuelson with respect to the setup of the	14:28:05
3	server or the Clinton e-mail system?	14:28:07
4	A No, I haven't.	14:28:09
5	Q Did you have any discussions with respect	14:28:10
6	to the setup of the server or the Clinton e-mail	14:28:15
7	system since you left the State Department with any	14:28:18
8	of the attorneys on behalf of Ms. Mills?	14:28:22
9	A No, I have -- I have not talked to her	14:28:26
10	attorneys.	14:28:28
11	Q Did you discuss the setup of the server or	14:28:28
12	the Clinton e-mail system since you left the State	14:28:33
13	Department with Secretary Clinton?	14:28:36
14	A No.	14:28:38
15	Q And the same question with any of the	14:28:39
16	attorneys for Secretary Clinton.	14:28:44
17	A No.	14:28:46
18	Q Do you know who Oscar Flores is?	14:28:47
19	A I do know Oscar, yes.	14:28:54
20	Q And can you tell me how you know	14:28:57
21	Mr. Flores?	14:28:58
22	A He -- I have known him for 20 years now.	14:28:59

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1 He is the property manager at the Clinton's 14:29:03
2 residence in Chappaqua. 14:29:07
3 Q Okay. And do you know what involvement 14:29:09
4 Mr. Flores had with respect to the setup of the 14:29:12
5 server or maintaining the Clinton system? 14:29:15
6 MS. WOLVERTON: Objection. Assumes facts 14:29:17
7 not in evidence. 14:29:18
8 MR. BRILLE: Foundation. 14:29:18
9 You can go ahead. 14:29:19
10 A No, I don't. 14:29:20
11 Q Okay. How about John David -- Davidson; 14:29:21
12 do you know -- 14:29:25
13 MS. WOLVERTON: Same objection. 14:29:26
14 A I know -- I know John Davidson, yes. 14:29:27
15 MS. WOLVERTON: Oh, I'm sorry. I 14:29:30
16 incorporated your last question into that question. 14:29:33
17 A I know John, yes. 14:29:35
18 Q Okay. And how do you know him? 14:29:36
19 A He works in President Clinton's office 14:29:38
20 now, and I've known him for many years. 14:29:40
21 Q Okay. And do you have any knowledge with 14:29:42
22 respect to any involvement he may have had with 14:29:45

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1	respect to setting up the server or maintaining the	14:29:48
2	Clintonemail.com system?	14:29:51
3	A No.	14:29:53
4	Q Okay. And, Ms. Abedin, in this lawsuit	14:29:53
5	you returned some of your federal records to the	14:30:11
6	State Department. Is that correct?	14:30:15
7	MS. WOLVERTON: Objection. Lack of	14:30:17
8	foundation.	14:30:20
9	MR. BRILLE: Objection. Foundation and	14:30:21
10	scope. How does this relate to the scope?	14:30:24
11	MS. COTCA: Processing of this particular	14:30:25
12	FOIA request. Judge Sullivan issued an order for	14:30:27
13	the State Department to request the return of	14:30:30
14	Ms. Abedin's e-mails. I think it's entirely within	14:30:32
15	the scope.	14:30:35
16	MR. BRILLE: Could I hear the question	14:30:44
17	back?	14:30:45
18	(Pending question read.)	14:30:53
19	MR. BRILLE: I'll object to the form and	14:30:54
20	foundation.	14:30:55
21	You can answer it, to the extent you	14:30:57
22	understand it.	14:30:59

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1	A	Yes, I did.	14:31:00
2	Q	Okay. And when did you return records to	14:31:01
3		the State Department?	14:31:05
4	A	It was last year.	14:31:07
5	Q	Okay. That's 2015?	14:31:08
6	A	Correct.	14:31:11
7	Q	Okay. Is that in the summer of last year?	14:31:11
8		Does that sound right?	14:31:14
9	A	That sounds right.	14:31:16
10	Q	Okay. And with respect to the process of	14:31:17
11		returning your records to the State Department --	14:31:20
12	A	Yes.	14:31:23
13	Q	-- I would like to talk a little bit about	14:31:23
14		that.	14:31:25
15	A	Sure.	14:31:25
16	Q	How did you go about searching for what	14:31:25
17		records you may have in your possession to be	14:31:29
18		returned to the State Department?	14:31:31
19		MS. WOLVERTON: I object to this line of	14:31:33
20		questioning as beyond the scope of authorized	14:31:34
21		discovery.	14:31:37
22		MS. COTCA: And I disagree.	14:31:38

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1	MR. BRILLE: I'll -- I'll have the same	14:31:41
2	objection.	14:31:42
3	You can answer it.	14:31:43
4	A I -- I looked for all the devices that may	14:31:46
5	have any of my State Department work on it and	14:31:55
6	returned -- returned -- gave them to my attorneys	14:31:59
7	for them to review for all relevant documents. And	14:32:02
8	gave them devices and paper.	14:32:06
9	Q Okay. And what devices did you return for	14:32:09
10	your attorneys to look through with respect to	14:32:13
11	federal records you may have had in your possession	14:32:15
12	to be returned to the State Department?	14:32:18
13	MS. WOLVERTON: Objection. Beyond the	14:32:19
14	scope.	14:32:20
15	A My -- if my memory serves me correctly, it	14:32:22
16	was two laptops, a BlackBerry, and some files that I	14:32:27
17	found in my apartment.	14:32:33
18	Q Okay. The BlackBerry that you returned,	14:32:34
19	is that a BlackBerry that was associated with your	14:32:38
20	Clintonemail.com account?	14:32:40
21	A Yes.	14:32:42
22	MS. WOLVERTON: Objection. Beyond the	14:32:43

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1	scope of discovery.	14:32:44
2	THE WITNESS: Sorry.	14:32:45
3	MR. BRILLE: That's okay. Just take a	14:32:46
4	second.	14:32:47
5	THE WITNESS: Sorry.	14:32:47
6	MR. BRILLE: That's okay. You're okay.	14:32:48
7	You're doing fine. Just take a little bit of a	14:32:49
8	pause.	14:32:52
9	Q Was your answer yes, Ms. Abedin?	14:32:52
10	A The answer is yes.	14:32:55
11	Q Okay. Thank you.	14:32:56
12	And the two laptops that you returned, or	14:32:58
13	you gave to -- provided to your attorneys to look	14:33:01
14	through, did they have e-mails from the	14:33:03
15	Clintonemail.com account?	14:33:06
16	MS. WOLVERTON: Objection. Beyond the	14:33:09
17	scope of authorized discovery.	14:33:10
18	A I was not involved in the process. I -- I	14:33:15
19	provided them with the devices and the materials and	14:33:17
20	asked them to find whatever they thought was	14:33:22
21	relevant and appropriate, whatever was their	14:33:24
22	determination as to what was a federal record, and	14:33:30

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1	they did. They turned materials in, and I know they	14:33:32
2	did so. I couldn't tell you from what device.	14:33:36
3	Q Okay. Did you provide your account	14:33:38
4	information, your login and your password to your	14:33:43
5	Clintonemail.com account, to your attorneys, for	14:33:46
6	them to review all of the e-mails that were on that	14:33:49
7	account?	14:33:53
8	MS. WOLVERTON: Objection. Beyond the	14:33:55
9	scope of authorized discovery.	14:33:56
10	MR. BRILLE: Same objection.	14:33:58
11	You can answer.	14:33:58
12	A Yes, I did.	14:33:59
13	Q And do you know if they reviewed all of	14:34:00
14	the e-mails that were on your Clintonemail.com?	14:34:03
15	MS. WOLVERTON: Same objection.	14:34:06
16	MR. BRILLE: You can answer.	14:34:08
17	Objection, but you can answer.	14:34:10
18	A Ye.	14:34:12
19	Q How do you know that?	14:34:17
20	MR. BRILLE: Objection. I'm going to	14:34:18
21	instruct the witness not to answer to the extent	14:34:19
22	that it would reveal conversations with your	14:34:21

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1	attorneys.	14:34:22
2	If you can answer that question without	14:34:23
3	revealing discussions with your attorneys, then I	14:34:24
4	would let you answer it. But if your only knowledge	14:34:26
5	comes from discussions with your lawyers, then I'm	14:34:29
6	going to instruct you not to answer.	14:34:31
7	Does that make sense? Do you understand?	14:34:33
8	THE WITNESS: That makes sense, yes.	14:34:35
9	MS. WOLVERTON: And I still object based	14:34:36
10	on the scope.	14:34:37
11	Q So are you --	14:34:38
12	MR. BRILLE: Can you answer the question?	14:34:40
13	Q Can you answer that question?	14:34:41
14	A I cannot answer that question.	14:34:42
15	Q Okay. Thank you.	14:34:43
16	A Thank you.	14:34:44
17	Q And without going into discussions you had	14:34:44
18	with your attorneys, do you know what process was --	14:34:57
19	was undertaken as part of the review of your records	14:35:00
20	to return federal records to the State Department?	14:35:06
21	MR. BRILLE: Same. Same objection.	14:35:10
22	MS. WOLVERTON: And objection.	14:35:11

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1	MR. BRILLE: If you can answer that	14:35:12
2	question without revealing what you discussed with	14:35:13
3	your lawyers, you can answer it. Otherwise, I would	14:35:15
4	instruct you not to answer the question.	14:35:17
5	MS. WOLVERTON: And I object based on	14:35:18
6	scope of discovery.	14:35:19
7	A I don't know.	14:35:20
8	Q You don't know, or you can't answer that	14:35:20
9	question based on the instruction of your attorney?	14:35:24
10	A I can't answer that question based on the	14:35:28
11	instruction of my attorney.	14:35:29
12	Q Okay. And you are following your	14:35:30
13	attorney's advice in not answering that question.	14:35:38
14	Correct?	14:35:42
15	A Yes, I am.	14:35:42
16	Q What was your practice since you left the	14:35:43
17	State Department with respect to e-mails that were	14:35:52
18	on your Clintonemail.com account, and how you	14:35:55
19	managed those e-mails?	14:36:01
20	MS. WOLVERTON: Objection.	14:36:02
21	MR. BRILLE: Objection.	14:36:02
22	MS. WOLVERTON: Beyond the scope of	14:36:04

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1	authorized discovery.	14:36:05
2	MR. BRILLE: Yeah. Objection. What's the	14:36:06
3	scope here? How is that within the scope here?	14:36:08
4	MS. COTCA: Well, there are federal	14:36:10
5	records that were on that account, and I'm asking	14:36:11
6	how she managed those federal records prior to	14:36:13
7	returning them, physically returning them.	14:36:16
8	MR. BRILLE: After leaving the State	14:36:18
9	Department but prior to returning them?	14:36:20
10	MS. COTCA: Correct.	14:36:22
11	MS. WOLVERTON: Same objection.	14:36:23
12	MR. BRILLE: You can answer that question.	14:36:24
13	A My practice with my Clinton e-mail was	14:36:26
14	similar to what I had with my State account, which	14:36:28
15	is that I left everything in -- in the Inbox, and	14:36:31
16	I -- I transitioned to a new e-mail once the	14:36:38
17	Secretary's office was set up, her personal office	14:36:41
18	post State Department. And I was -- and I no longer	14:36:46
19	used Clinton e-mail.	14:36:50
20	Q Who is paying for your legal fees for your	14:36:51
21	representation in this lawsuit?	14:37:01
22	MR. BRILLE: Objection.	14:37:02

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1	Instruct the witness not to answer.	14:37:04
2	MS. WOLVERTON: Objection. Beyond the	14:37:05
3	scope.	14:37:06
4	MR. BRILLE: And beyond the scope.	14:37:07
5	Q Did you have any contact or communications	14:37:09
6	with anybody from Platte River Networks with respect	14:37:15
7	to the setup of the server or the Clintonemail.com	14:37:19
8	system?	14:37:22
9	A While I was at State?	14:37:26
10	Q Well, let's start with while you were at	14:37:27
11	State Department.	14:37:29
12	A I don't remember conversations while I was	14:37:31
13	at State. But after -- and my memory on the dates	14:37:33
14	is fuzzy here. But once, when Platte River took	14:37:38
15	over the IT responsibility for the office of the	14:37:42
16	President and Chelsea, and then the -- and including	14:37:44
17	the office of the former Secretary, I did have a new	14:37:47
18	contact to whom I would then communicate with when	14:37:50
19	we were having issues with our -- our -- our	14:37:54
20	e-mails.	14:37:59
21	Q Okay. My followup question was, what were	14:37:59
22	the -- what were the exchanges that you had with the	14:38:07

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1	individuals at Platte Networks?	14:38:10
2	MS. WOLVERTON: Objection. Beyond the	14:38:13
3	scope of the authorized discovery.	14:38:14
4	A I don't remember having -- I don't	14:38:19
5	remember having very many. It was just an	14:38:20
6	introduction of a new -- there was a new team that	14:38:22
7	had been hired to provide IT support.	14:38:24
8	Q And did you have any contact with anybody	14:38:31
9	from Datto, Inc., with respect to the setup of the	14:38:38
10	server?	14:38:43
11	A From, I'm sorry, where?	14:38:44
12	Q Data, Inc. Datto. Datto, Inc. I may be	14:38:46
13	pronouncing it incorrectly.	14:38:50
14	A I haven't -- it doesn't sound familiar to	14:38:52
15	me.	14:38:55
16	Q D-A-T-T-O, Inc. Does that sound familiar?	14:38:55
17	A It doesn't sound familiar to me. I'm	14:38:58
18	sorry.	14:39:00
19	Q Okay. What is the Clinton Executive	14:39:00
20	Service Corp.?	14:39:05
21	MR. BRILLE: Objection. Scope. What's	14:39:07
22	the -- how is that within scope?	14:39:09

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1	MS. WOLVERTON: Same objection.	14:39:11
2	MS. COTCA: With respect to who was paying	14:39:14
3	for the server and the setup of the e-mail system.	14:39:15
4	A I -- I don't know. I don't -- I don't	14:39:19
5	know what that is.	14:39:22
6	MR. BRILLE: Okay.	14:39:23
7	Q Are you familiar with the Clinton	14:39:23
8	Executive Service Corporation?	14:39:25
9	A I'm -- I'm not.	14:39:29
10	Q Okay.	14:39:30
11	MS. COTCA: I think we're getting ready to	14:39:34
12	wrap up. So if we can take a five-minute break and	14:39:36
13	come back.	14:39:38
14	MR. BRILLE: Sure. That's fine.	14:39:39
15	VIDEO SPECIALIST: We are off the record	14:39:40
16	at 14:39.	14:39:41
17	(A recess was taken.)	14:39:43
18	VIDEO SPECIALIST: We are back on the	14:49:53
19	record at 14:49.	14:49:57
20	BY MS. COTCA:	14:50:00
21	Q Ms. Abedin, just a few more questions.	14:50:01
22	Prior -- after you left the State	14:50:05

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1	Department and prior to providing access to your	14:50:07
2	Clinton e-mail account to your attorneys last year,	14:50:09
3	did you delete any of your e-mails on the	14:50:13
4	Clintonemail.com account?	14:50:15
5	A Not -- not that -- not that I recall, no.	14:50:18
6	Q Do you recall how many e-mails were on	14:50:20
7	your account and how many were returned to the State	14:50:25
8	Department last year?	14:50:29
9	A I don't recall how many were -- were	14:50:32
10	returned. I certainly don't recall how many was	14:50:34
11	on -- was on the account.	14:50:37
12	I -- I ceased to use that account. I	14:50:39
13	transitioned to a new office account. I just left	14:50:41
14	everything on what -- on the system, I guess.	14:50:44
15	Q Okay. Can you still access your account	14:50:47
16	to the Clintonemail.com address?	14:50:50
17	A No. I haven't been able to for some time.	14:50:52
18	Q And if you could take a look at Exhibit	14:50:55
19	10?	14:51:02
20	A Okay.	14:51:03
21	Q That is the e-mail exchange you had with	14:51:03
22	Secretary Clinton on November 13 of 2010.	14:51:07

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1	Do you know whether Secretary Clinton	14:51:12
2	returned that record to the State Department?	14:51:14
3	MS. WOLVERTON: Objection.	14:51:18
4	MR. BRILLE: Objection. Vague.	14:51:20
5	MS. WOLVERTON: Foundation.	14:51:21
6	MR. BRILLE: Do you mean this document	14:51:22
7	that she's looking at?	14:51:23
8	MS. WOLVERTON: Foundation.	14:51:25
9	MS. COTCA: Yes. A copy of that document.	14:51:26
10	MR. BRILLE: Okay.	14:51:28
11	A I don't know what -- I don't know if she	14:51:28
12	turned it in. I don't know.	14:51:31
13	MS. COTCA: Thank you very much for your	14:51:37
14	time. That's it.	14:51:38
15	MR. BRILLE: Thank you. We just have a	14:51:39
16	couple of questions.	14:51:40
17	EXAMINATION BY COUNSEL FOR THE WITNESS	14:51:41
18	BY MR. BRILLE:	14:51:41
19	Q Good afternoon, Ms. Abedin.	14:51:43
20	A Good afternoon.	14:51:45
21	Q As Deputy Chief of Staff for operations,	14:51:45
22	were you responsible for overseeing records	14:51:48

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1	retention for the Office of the Secretary?	14:51:49
2	A No.	14:51:52
3	Q Who was responsible for that function, to	14:51:53
4	your knowledge?	14:51:57
5	A There were State Department officials	14:51:57
6	responsible.	14:51:57
7	Q As Deputy Chief of Staff for operations,	14:51:57
8	were you responsible for overseeing compliance with	14:52:01
9	FOIA requests in the Office of the Secretary?	14:52:03
10	A No.	14:52:05
11	Q And who, to your knowledge, was	14:52:05
12	responsible for that function?	14:52:08
13	A Career State Department officials.	14:52:10
14	Q Do you have any personal knowledge,	14:52:11
15	sitting here today, of the process used by the State	14:52:13
16	Department for producing records to Judicial Watch	14:52:16
17	in this litigation?	14:52:20
18	A No.	14:52:21
19	Q Do you know how the State Department	14:52:21
20	processed FOIA requests that seek records from your	14:52:23
21	Clintonemail.com account?	14:52:26
22	A No, I don't.	14:52:27

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1	Q	Okay. Do you know how the State	14:52:29
2		Department processed FOIA requests to seek records	14:52:31
3		from Secretary Clinton's e-mail accounts?	14:52:35
4	A	No, I don't.	14:52:36
5	Q	At any time during your tenure at the	14:52:37
6		State Department, did you have any concerns about	14:52:40
7		the Secretary's use of Clintonemail.com for State	14:52:41
8		Department business?	14:52:44
9	A	No, I didn't.	14:52:45
10	Q	Why not?	14:52:46
11	A	I -- I assumed it was allowed.	14:52:47
12	Q	Why not?	14:52:48
13	A	I assumed it was allowed. It didn't occur	14:52:48
14		to us.	14:52:51
15	Q	Okay. Were you responsible for setting up	14:52:52
16		Clinton -- the Clintonemail.com system?	14:52:54
17	A	No.	14:52:56
18	Q	Were you responsible for maintaining the	14:52:57
19		Clintonemail.com system?	14:52:59
20	A	No.	14:53:02
21	Q	What e-mail did you use to conduct State	14:53:02
22		Department-related business while you were a State	14:53:04

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1	Department employee?	14:53:06
2	A I used State -- my State.gov.	14:53:07
3	Q And how would you characterize your use of	14:53:10
4	State.gov in relation to your Clintonemail.com	14:53:12
5	account?	14:53:15
6	A I did the vast majority of my work on my	14:53:16
7	State.gov account.	14:53:18
8	Q Okay. To your knowledge, how did	14:53:19
9	Secretary Clinton typically conduct State Department	14:53:21
10	business?	14:53:24
11	A Most of her State Department business was	14:53:24
12	done in person, in meetings at the State Department	14:53:26
13	or when she traveled, or by phone.	14:53:30
14	Q And when she used e-mail, she used her	14:53:32
15	Clintonemail.com account?	14:53:34
16	A When she used e-mail off hours and when we	14:53:36
17	were on the road, she did use, yes,	14:53:39
18	Clintonemail.com.	14:53:42
19	Q Was that a secret, to your knowledge,	14:53:42
20	within the State Department?	14:53:44
21	A It was not a secret.	14:53:45
22	Q Do you have any reason to believe that	14:53:46

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1	Clintonemail.com was used by anyone to thwart FOIA	14:53:47
2	obligations?	14:53:51
3	A Absolutely not.	14:53:51
4	MR. BRILLE: That's all I have.	14:53:53
5	MS. WOLVERTON: No questions. Thank you.	14:53:55
6	MS. COTCA: I just have two followup	14:53:57
7	questions.	14:53:59
8	MR. BRILLE: Sure.	14:54:00
9	EXAMINATION BY COUNSEL FOR PLAINTIFF	14:54:01
10	BY MS. COTCA:	14:54:01
11	Q Ms. Abedin, when -- with respect to the	14:54:02
12	question your attorney was asking you about who at	14:54:03
13	the State Department was responsible for overseeing	14:54:06
14	document retention, you said, you answered, State	14:54:09
15	Department officials. Who are those officials?	14:54:15
16	A I couldn't name them all individually by	14:54:17
17	name, which is why I answered it that way.	14:54:20
18	Q Okay. Can you identify the offices or	14:54:23
19	office that they worked in?	14:54:26
20	A For the -- for records?	14:54:30
21	Q Right. For the officials you were	14:54:31
22	referring to with respect to overseeing document	14:54:33

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1	retention.	14:54:35
2	A It would be the Office of Records and	14:54:37
3	Management, is my understanding.	14:54:39
4	Q And then also the same question with	14:54:41
5	respect to State official -- State Department	14:54:44
6	officials, you said who oversaw FOIA requests during	14:54:47
7	your tenure there.	14:54:51
8	Can you identify them by name?	14:54:52
9	A I -- I don't know who was responsible at	14:54:54
10	the State Department for FOIA requests.	14:54:57
11	Q And how do you know they were State career	14:55:01
12	officials when you answered your attorney's	14:55:04
13	question?	14:55:09
14	A I -- I would imagine the -- this is the --	14:55:15
15	overseeing FOIA is a matter that takes place not --	14:55:19
16	doesn't matter who is the Secretary of State,	14:55:23
17	there's a process in place that exists at the	14:55:24
18	department that existed before we got there, that	14:55:27
19	existed when we were there, and continues to exist.	14:55:30
20	So there is a -- an office within the department	14:55:32
21	that is responsible for that.	14:55:35
22	I can't imagine that's not a career State	14:55:36

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1	Department official who is responsible.	14:55:39
2	MS. COTCA: That's all. Thank you. Thank	14:55:45
3	you, ma'am.	14:55:47
4	MR. BRILLE: Thank you. Thanks.	14:55:47
5	VIDEO SPECIALIST: This ends the	14:55:48
6	deposition of Huma Abedin. We are off the record at	14:55:49
7	14:55.	14:55:53
8	(Off the record at 2:55 p.m.)	
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1 CERTIFICATE OF SHORTHAND REPORTER - NOTARY PUBLIC
2 I, Debra Ann Whitehead, the officer before whom
3 the foregoing deposition was taken, do hereby
4 certify that the foregoing transcript is a true and
5 correct record of the testimony given; that said
6 testimony was taken by me stenographically and
7 thereafter reduced to typewriting under my
8 direction; that reading and signing was not
9 requested; and that I am neither counsel for,
10 related to, nor employed by any of the parties to
11 this case and have no interest, financial or
12 otherwise, in its outcome.

13 IN WITNESS WHEREOF, I have hereunto set my hand and
14 affixed my notarial seal this 28th day of June,
15 2016.

16
17 My commission expires:

18 September 14, 2018



19
20 Debra Ann Whitehead

21 NOTARY PUBLIC IN AND FOR THE

22 DISTRICT OF COLUMBIA

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UNITED STATES DISTRICT COURT

for the
District of Columbia

Judicial Watch, Inc.
Plaintiff
v.
U.S. Dep't of State
Defendant
Civil Action No. 13-1363 (EGS)

SECOND AMENDED SUBPOENA TO TESTIFY AT A DEPOSITION IN A CIVIL ACTION

To: Huma Abedin
c/o Karen Dunn, Boies, Schiller & Flexner, LLP, 5301 Wisconsin Ave., NW, Washington DC 20015
(Name of person to whom this subpoena is directed)

Testimony: YOU ARE COMMANDED to appear at the time, date, and place set forth below to testify at a deposition to be taken in this civil action. If you are an organization, you must designate one or more officers, directors, or managing agents, or designate other persons who consent to testify on your behalf about the following matters, or those set forth in an attachment:

Place: Bryan Cave, LLP
1155 F Street, NW
Washington, D.C. 20004
Date and Time: 06/28/2016 9:30 am

The deposition will be recorded by this method: stenographic and audiovisual means

Production: You, or your representatives, must also bring with you to the deposition the following documents, electronically stored information, or objects, and must permit inspection, copying, testing, or sampling of the material:

The following provisions of Fed. R. Civ. P. 45 are attached -- Rule 45(c), relating to the place of compliance; Rule 45(d), relating to your protection as a person subject to a subpoena; and Rule 45(e) and (g), relating to your duty to respond to this subpoena and the potential consequences of not doing so.

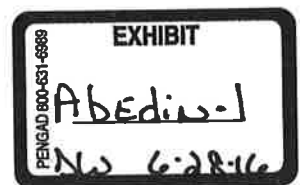
Date: 06/14/2016
CLERK OF COURT

OR
[Signature]
Attorney's signature

The name, address, e-mail address, and telephone number of the attorney representing (name of party)
Judicial Watch, Inc., who issues or requests this subpoena, are:
Ramona R. Cotca, Judicial Watch, Inc., 425 Third Street, SW, Ste. 800, Washington, DC 20024; (202) 646-5172;
rcotca@judicialwatch.org

Notice to the person who issues or requests this subpoena

If this subpoena commands the production of documents, electronically stored information, or tangible things before trial, a notice and a copy of the subpoena must be served on each party in this case before it is served on the person to whom it is directed. Fed. R. Civ. P. 45(a)(4).



UNITED STATES DISTRICT COURT
for the
District of Columbia

Judicial Watch, Inc.
Plaintiff
v.
U.S. Dep't of State
Defendant
Civil Action No. 13-1363 (EGS)

AMENDED SUBPOENA TO TESTIFY AT A DEPOSITION IN A CIVIL ACTION

To: Huma Abedin
c/o Karen L. Dunn, Esq., Boies, Schiller & Flexber LLP, 5301 Wisconsin Ave., NW, Washington DC 20015
(Name of person to whom this subpoena is directed)

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Table with 2 columns: Place and Date and Time. Place: Judicial Watch, Inc., 425 Third Street, SW, Suite 800, Washington, DC 20024. Date and Time: 06/28/2016 9:00 am

The deposition will be recorded by this method: stenographic and audiovisual means

Production: You, or your representatives, must also bring with you to the deposition the following documents, electronically stored information, or objects, and must permit inspection, copying, testing, or sampling of the material:

The following provisions of Fed. R. Civ. P. 45 are attached -- Rule 45(c), relating to the place of compliance; Rule 45(d), relating to your protection as a person subject to a subpoena; and Rule 45(c) and (g), relating to your duty to respond to this subpoena and the potential consequences of not doing so.

Date: 05/17/2016

CLERK OF COURT

OR

Handwritten signature of attorney

Signature of Clerk or Deputy Clerk

Attorney's signature

The name, address, e-mail address, and telephone number of the attorney representing (name of party) Judicial Watch, Inc., who issues or requests this subpoena, are:

Ramona R. Cotca, Judicial Watch, Inc., 425 Third Street, SW, Ste. 800, Washington, DC 20024; (202) 646-5172; rcotca@judicialwatch.org

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UNITED STATES DISTRICT COURT

for the

District of Columbia

Judicial Watch, Inc.

Plaintiff

v.

U.S. Dep't of State

Defendant

Civil Action No. 13-1363 (EGS)

SUBPOENA TO TESTIFY AT A DEPOSITION IN A CIVIL ACTION

To: Huma Abedin
c/o Karen L. Dunn, Esq., Boies, Schiller & Flexber, LLP, 5301 Wisconsin Ave., NW, Washington, D.C. 20015
(Name of person to whom this subpoena is directed)

Testimony: YOU ARE COMMANDED to appear at the time, date, and place set forth below to testify at a deposition to be taken in this civil action. If you are an organization, you must designate one or more officers, directors, or managing agents, or designate other persons who consent to testify on your behalf about the following matters, or those set forth in an attachment:

Table with 2 columns: Place (Planet Depos, 1100 Connecticut Ave., NW, Ste. 950, Washington, D.C. 20036) and Date and Time (06/23/2016 10:00 am)

The deposition will be recorded by this method: stenographic and audiovisual means

Production: You, or your representatives, must also bring with you to the deposition the following documents, electronically stored information, or objects, and must permit inspection, copying, testing, or sampling of the material:

The following provisions of Fed. R. Civ. P. 45 are attached - Rule 45(c), relating to the place of compliance; Rule 45(d), relating to your protection as a person subject to a subpoena; and Rule 45(e) and (g), relating to your duty to respond to this subpoena and the potential consequences of not doing so.

Date: 05/11/2016
CLERK OF COURT

OR
[Handwritten Signature]
Attorney's signature

The name, address, e-mail address, and telephone number of the attorney representing (name of party) Judicial Watch, Inc., who issues or requests this subpoena, are: Ramona R. Cotca, Judicial Watch, Inc., 425 Third Street, SW, Ste. 800, Washington, D.C. 20024, (202)646-5172, rcotca@judicialwatch.org

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Civil Action No. 13-1363 (EGS)

PROOF OF SERVICE

(This section should not be filed with the court unless required by Fed. R. Civ. P. 45.)

I received this subpoena for *(name of individual and title, if any)* _____
on *(date)* _____.

I served the subpoena by delivering a copy to the named individual as follows: _____
_____ on *(date)* _____; or

I returned the subpoena unexecuted because: _____
_____.

Unless the subpoena was issued on behalf of the United States, or one of its officers or agents, I have also
tendered to the witness the fees for one day's attendance, and the mileage allowed by law, in the amount of
\$ _____.

My fees are \$ _____ for travel and \$ _____ for services, for a total of \$ _____ 0.00.

I declare under penalty of perjury that this information is true.

Date: _____

Server's signature

Printed name and title

Server's address

Additional information regarding attempted service, etc.:

Federal Rule of Civil Procedure 45 (c), (d), (e), and (g) (Effective 12/1/13)

(c) Place of Compliance.

(1) *For a Trial, Hearing, or Deposition.* A subpoena may command a person to attend a trial, hearing, or deposition only as follows:

- (A) within 100 miles of where the person resides, is employed, or regularly transacts business in person; or
- (B) within the state where the person resides, is employed, or regularly transacts business in person, if the person
 - (i) is a party or a party's officer; or
 - (ii) is commanded to attend a trial and would not incur substantial expense.

(2) *For Other Discovery.* A subpoena may command:

- (A) production of documents, electronically stored information, or tangible things at a place within 100 miles of where the person resides, is employed, or regularly transacts business in person; and
- (B) inspection of premises at the premises to be inspected.

(d) Protecting a Person Subject to a Subpoena; Enforcement.

(1) *Avoiding Undue Burden or Expense; Sanctions.* A party or attorney responsible for issuing and serving a subpoena must take reasonable steps to avoid imposing undue burden or expense on a person subject to the subpoena. The court for the district where compliance is required must enforce this duty and impose an appropriate sanction—which may include lost earnings and reasonable attorney's fees—on a party or attorney who fails to comply.

(2) *Command to Produce Materials or Permit Inspection.*

(A) *Appearance Not Required.* A person commanded to produce documents, electronically stored information, or tangible things, or to permit the inspection of premises, need not appear in person at the place of production or inspection unless also commanded to appear for a deposition, hearing, or trial.

(B) *Objections.* A person commanded to produce documents or tangible things or to permit inspection may serve on the party or attorney designated in the subpoena a written objection to inspecting, copying, testing, or sampling any or all of the materials or to inspecting the premises—or to producing electronically stored information in the form or forms requested. The objection must be served before the earlier of the time specified for compliance or 14 days after the subpoena is served. If an objection is made, the following rules apply:

- (i) At any time, on notice to the commanded person, the serving party may move the court for the district where compliance is required for an order compelling production or inspection.
- (ii) These acts may be required only as directed in the order, and the order must protect a person who is neither a party nor a party's officer from significant expense resulting from compliance.

(3) *Quashing or Modifying a Subpoena.*

(A) *When Required.* On timely motion, the court for the district where compliance is required must quash or modify a subpoena that:

- (i) fails to allow a reasonable time to comply;
- (ii) requires a person to travel beyond the geographical limits specified in Rule 45(c);
- (iii) requires disclosure of privileged or other protected matter, if no exception or waiver applies; or
- (iv) subjects a person to undue burden.

(B) *When Permitted.* To protect a person subject to or affected by a subpoena, the court for the district where compliance is required may, on motion, quash or modify the subpoena if it requires:

(i) disclosing a trade secret or other confidential research, development, or commercial information; or

(ii) disclosing an unretained expert's opinion or information that does not describe specific occurrences in dispute and results from the expert's study that was not requested by a party.

(C) *Specifying Conditions as an Alternative.* In the circumstances described in Rule 45(d)(3)(B), the court may, instead of quashing or modifying a subpoena, order appearance or production under specified conditions if the serving party:

- (i) shows a substantial need for the testimony or material that cannot be otherwise met without undue hardship; and
- (ii) ensures that the subpoenaed person will be reasonably compensated.

(e) Duties in Responding to a Subpoena.

(1) *Producing Documents or Electronically Stored Information.* These procedures apply to producing documents or electronically stored information:

(A) *Documents.* A person responding to a subpoena to produce documents must produce them as they are kept in the ordinary course of business or must organize and label them to correspond to the categories in the demand.

(B) *Form for Producing Electronically Stored Information Not Specified.* If a subpoena does not specify a form for producing electronically stored information, the person responding must produce it in a form or forms in which it is ordinarily maintained or in a reasonably usable form or forms.

(C) *Electronically Stored Information Produced in Only One Form.* The person responding need not produce the same electronically stored information in more than one form.

(D) *Inaccessible Electronically Stored Information.* The person responding need not provide discovery of electronically stored information from sources that the person identifies as not reasonably accessible because of undue burden or cost. On motion to compel discovery or for a protective order, the person responding must show that the information is not reasonably accessible because of undue burden or cost. If that showing is made, the court may nonetheless order discovery from such sources if the requesting party shows good cause, considering the limitations of Rule 26(b)(2)(C). The court may specify conditions for the discovery.

(2) *Claiming Privilege or Protection.*

(A) *Information Withheld.* A person withholding subpoenaed information under a claim that it is privileged or subject to protection as trial-preparation material must:

- (i) expressly make the claim; and
- (ii) describe the nature of the withheld documents, communications, or tangible things in a manner that, without revealing information itself privileged or protected, will enable the parties to assess the claim.

(B) *Information Produced.* If information produced in response to a subpoena is subject to a claim of privilege or of protection as trial-preparation material, the person making the claim may notify any party that received the information of the claim and the basis for it. After being notified, a party must promptly return, sequester, or destroy the specified information and any copies it has; must not use or disclose the information until the claim is resolved; must take reasonable steps to retrieve the information if the party disclosed it before being notified; and may promptly present the information under seal to the court for the district where compliance is required for a determination of the claim. The person who produced the information must preserve the information until the claim is resolved.

(g) *Contempt.*

The court for the district where compliance is required—and also, after a motion is transferred, the issuing court—may hold in contempt a person who, having been served, fails without adequate excuse to obey the subpoena or an order related to it.

UNITED STATES DISTRICT COURT

for the District of Columbia

Judicial Watch, Inc.

Plaintiff

v.

U.S. Dep't of State

Defendant

Civil Action No. 13-1363 (EGS)

SECOND AMENDED SUBPOENA TO TESTIFY AT A DEPOSITION IN A CIVIL ACTION

To: Huma Abedin c/o Karen Dunn, Boies, Schiller & Flexner, LLP, 5301 Wisconsin Ave., NW, Washington DC 20015

Testimony: YOU ARE COMMANDED to appear at the time, date, and place set forth below to testify at a deposition to be taken in this civil action.

Table with 2 columns: Place (Bryan Cave, LLP, 1155 F Street, NW, Washington, D.C. 20004) and Date and Time (06/28/2016 9:30 am)

The deposition will be recorded by this method: stenographic and audiovisual means

Production: You, or your representatives, must also bring with you to the deposition the following documents, electronically stored information, or objects, and must permit inspection, copying, testing, or sampling of the material:

The following provisions of Fed. R. Civ. P. 45 are attached -- Rule 45(c), relating to the place of compliance; Rule 45(d), relating to your protection as a person subject to a subpoena; and Rule 45(e) and (g), relating to your duty to respond to this subpoena and the potential consequences of not doing so.

Date: 06/14/2016

CLERK OF COURT

OR

Handwritten signature of Ramona R. Cotca

Signature of Clerk or Deputy Clerk

Attorney's signature

The name, address, e-mail address, and telephone number of the attorney representing (name of party) Judicial Watch, Inc., who issues or requests this subpoena, are:

Ramona R. Cotca, Judicial Watch, Inc., 425 Third Street, SW, Ste. 800, Washington, DC 20024; (202) 646-5172; rcotca@judicialwatch.org

Notice to the person who issues or requests this subpoena

If this subpoena commands the production of documents, electronically stored information, or tangible things before trial, a notice and a copy of the subpoena must be served on each party in this case before it is served on the person to whom it is directed. Fed. R. Civ. P. 45(a)(4).

UNITED STATES DISTRICT COURT
for the
District of Columbia

Judicial Watch, Inc.

Plaintiff

v.

U.S. Dep't of State

Defendant

Civil Action No. 13-1363 (EGS)

AMENDED SUBPOENA TO TESTIFY AT A DEPOSITION IN A CIVIL ACTION

To: Huma Abedin
c/o Karen L. Dunn, Esq., Boies, Schiller & Flexber LLP, 5301 Wisconsin Ave., NW, Washington DC 20015
(Name of person to whom this subpoena is directed)

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Place: Judicial Watch, Inc.
425 Third Street, SW, Suite 800
Washington, DC 20024
Date and Time: 06/28/2016 9:00 am

The deposition will be recorded by this method: stenographic and audiovisual means

Production: You, or your representatives, must also bring with you to the deposition the following documents, electronically stored information, or objects, and must permit inspection, copying, testing, or sampling of the material:

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Date: 05/17/2016

CLERK OF COURT

OR

Signature of Attorney

Signature of Clerk or Deputy Clerk

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UNITED STATES DISTRICT COURT

for the
District of Columbia

Judicial Watch, Inc.

Plaintiff

v.

U.S. Dep't of State

Defendant

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SUBPOENA TO TESTIFY AT A DEPOSITION IN A CIVIL ACTION

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Date: 05/11/2016

CLERK OF COURT

OR

Handwritten signature of Ramona R. Cotca

Signature of Clerk or Deputy Clerk

Attorney's signature

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Civil Action No. 13-1363 (EGS)

PROOF OF SERVICE

(This section should not be filed with the court unless required by Fed. R. Civ. P. 45.)

I received this subpoena for *(name of individual and title, if any)* _____
on *(date)* _____.

I served the subpoena by delivering a copy to the named individual as follows: _____
_____ on *(date)* _____; or

I returned the subpoena unexecuted because: _____
_____.

Unless the subpoena was issued on behalf of the United States, or one of its officers or agents, I have also
tendered to the witness the fees for one day's attendance, and the mileage allowed by law, in the amount of
\$ _____.

My fees are \$ _____ for travel and \$ _____ for services, for a total of \$ 0.00.

I declare under penalty of perjury that this information is true.

Date: _____

Server's signature

Printed name and title

Server's address

Additional information regarding attempted service, etc.:

Federal Rule of Civil Procedure 45 (c), (d), (e), and (g) (Effective 12/1/13)

(c) Place of Compliance.

(1) *For a Trial, Hearing, or Deposition.* A subpoena may command a person to attend a trial, hearing, or deposition only as follows:

(A) within 100 miles of where the person resides, is employed, or regularly transacts business in person; or

(B) within the state where the person resides, is employed, or regularly transacts business in person, if the person

- (i) is a party or a party's officer; or
- (ii) is commanded to attend a trial and would not incur substantial expense.

(2) *For Other Discovery.* A subpoena may command:

(A) production of documents, electronically stored information, or tangible things at a place within 100 miles of where the person resides, is employed, or regularly transacts business in person; and

(B) inspection of premises at the premises to be inspected.

(d) Protecting a Person Subject to a Subpoena; Enforcement.

(1) *Avoiding Undue Burden or Expense; Sanctions.* A party or attorney responsible for issuing and serving a subpoena must take reasonable steps to avoid imposing undue burden or expense on a person subject to the subpoena. The court for the district where compliance is required must enforce this duty and impose an appropriate sanction—which may include lost earnings and reasonable attorney's fees—on a party or attorney who fails to comply.

(2) *Command to Produce Materials or Permit Inspection.*

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(B) *Objections.* A person commanded to produce documents or tangible things or to permit inspection may serve on the party or attorney designated in the subpoena a written objection to inspecting, copying, testing, or sampling any or all of the materials or to inspecting the premises—or to producing electronically stored information in the form or forms requested. The objection must be served before the earlier of the time specified for compliance or 14 days after the subpoena is served. If an objection is made, the following rules apply:

- (i) At any time, on notice to the commanded person, the serving party may move the court for the district where compliance is required for an order compelling production or inspection.
- (ii) These acts may be required only as directed in the order, and the order must protect a person who is neither a party nor a party's officer from significant expense resulting from compliance.

(3) *Quashing or Modifying a Subpoena.*

(A) *When Required.* On timely motion, the court for the district where compliance is required must quash or modify a subpoena that:

- (i) fails to allow a reasonable time to comply;
- (ii) requires a person to comply beyond the geographical limits specified in Rule 45(c);
- (iii) requires disclosure of privileged or other protected matter, if no exception or waiver applies; or
- (iv) subjects a person to undue burden.

(B) *When Permitted.* To protect a person subject to or affected by a subpoena, the court for the district where compliance is required may, on motion, quash or modify the subpoena if it requires:

(i) disclosing a trade secret or other confidential research, development, or commercial information; or

(ii) disclosing an unretained expert's opinion or information that does not describe specific occurrences in dispute and results from the expert's study that was not requested by a party.

(C) *Specifying Conditions as an Alternative.* In the circumstances described in Rule 45(d)(3)(B), the court may, instead of quashing or modifying a subpoena, order appearance or production under specified conditions if the serving party:

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(2) *Claiming Privilege or Protection.*

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- (i) expressly make the claim; and
- (ii) describe the nature of the withheld documents, communications, or tangible things in a manner that, without revealing information itself privileged or protected, will enable the parties to assess the claim.

(B) *Information Produced.* If information produced in response to a subpoena is subject to a claim of privilege or of protection as trial-preparation material, the person making the claim may notify any party that received the information of the claim and the basis for it. After being notified, a party must promptly return, sequester, or destroy the specified information and any copies it has; must not use or disclose the information until the claim is resolved; must take reasonable steps to retrieve the information if the party disclosed it before being notified; and may promptly present the information under seal to the court for the district where compliance is required for a determination of the claim. The person who produced the information must preserve the information until the claim is resolved.

(g) *Contempt.*

The court for the district where compliance is required—and also, after a motion is transferred, the issuing court—may hold in contempt a person who, having been served, fails without adequate excuse to obey the subpoena or an order related to it.



From: Mensah, Ebenezer T
Sent: Wednesday, December 22, 2010 2:30 PM
To: Lawrence, Thomas W; Jammes, Trey; Gazlay, Jay E
Cc: Wilson, Nancy L; LaVolpe, Kenneth E; Jacks, Yvette R
Subject: RE: Meeting with Huma

RELEASE IN PART
D6, D7

Thank you Thomas and we also appreciate all the assistance and team coordination on this matter as well. I will continue to work with your team so long as this and all other ScanMail issues persist. So, please do not hesitate to call or keep me in the loop if there are any issues or concerns relating to ScanMail or have any questions. I have a couple of meetings schedule with both VIRT/Trend Micro support on this matter and will continue to highlight the continuous problem areas as well as user frustrations going forward. Again, thanks for all the local assistance on this matter.

Ebenezer Mensah
Exchange Systems Engineer
IRMWOPS/MSO/EML
SkyePoint Decisions Support Contractor
(202) 634-0278
Mensahet@State.Gov

REVIEW
AUTHORITY:
Archie Bolster,
Senior Reviewer

From: Lawrence, Thomas W
Sent: Wednesday, December 22, 2010 12:22 PM
To: Mensah, Ebenezer T; Jammes, Trey; Gazlay, Jay E
Cc: Wilson, Nancy L; LaVolpe, Kenneth E; Jacks, Yvette R
Subject: RE: Meeting with Huma

EQ,

This was my call. Because I don't have all the facts to what exactly is going on with SMEX, I decided to be methodical. This is due to the fact both content filtering and anti-virus checking on that BH has blocked malicious content in the recent past. If we find the changes made are not affective, our next steps will be:

- A. Disable Content Filtering and restart SMTP services
- B. Verify - if problem continues...
- C. Disable AV Filtering and restart SMTP services
- D. Verify - if problem continues....
- E. Escalate

We will continue to communicate with you over the next couple of days as I have asked of you.

Again, thank you for your assistance. While we are frustrated with the situation, please don't misunderstand that is directed towards you. We are appreciative of all your efforts.
tom

From: Mensah, Ebenezer T
Sent: Wednesday, December 22, 2010 11:12 AM
To: Jammes, Trey; Gazlay, Jay E; Lawrence, Thomas W
Cc: Wilson, Nancy L; LaVolpe, Kenneth E; Jacks, Yvette R
Subject: RE: Meeting with Huma

EXHIBIT
Abedin-2
No 6-28-16
PENGAD 800-631-6888

Jay,

It's correct that Anti-spam need to be disabled per our recommendation but that was before we started receiving complaints for these isolated Issue with categorizer problems and through workaround, we discover that adding these two filters on our BHs eliminate that problem. And we've already brought it to VIRT and Trend Micro attention. We continue to work with them daily on these issue and believe they're working through those issues in the version 10 (Pilot) which seem to experience similar issue as Trey already elaborated on (also these new settings are not in original documentation).

So, in order to eliminate the categorizer issue which seem to be our primary concern, then you will want to disable the two additional filters as recommended and we will let you know if anything changes in the near future or else you will not get the user/customer satisfactory result on that very issue if those filters are still enabled. Thanks.

Attach is a copy of the installation guide for ScanMail 8.

Ebenezer Mensah
Exchange Systems Engineer
IRM/OPS/MSO/EML
SkyePoint Decisions Support Contractor
(202) 634-0278
Mensahet@State.Gov

From: Jammes, Trey
Sent: Wednesday, December 22, 2010 9:47 AM
To: Gazlay, Jay E; Lawrence, Thomas W; Mensah, Ebenezer T
Cc: Wilson, Nancy L; LaVolpe, Kenneth E; Jacks, Yvette R
Subject: RE: Meeting with Huma

I am not confident that Trend will provide an update for SMEX 8. That is two revs behind their current offering, SMEX 10, and they are pushing us to go to that (currently in pilot), and they have never not yet been able to deliver a fool-proof solution for an issue that has been around for at least 2 years. Unfortunately, we have seen similar problems with SMEX 10. EB, correct me if I'm wrong though, I don't think that we have seen the problem with SMEX 10 when running without the anti-SPAM piece.

Tom, what type of update are you looking for by 1500? I do think that turning off anti-SPAM is a resolution if that is what was causing the problem. Did the SMTP service ever get restarted? I don't think I got an answer on that.

Trey Jammes

From: Gazlay, Jay E
Sent: Wednesday, December 22, 2010 9:35 AM
To: Lawrence, Thomas W; Mensah, Ebenezer T; Jammes, Trey
Cc: Wilson, Nancy L; LaVolpe, Kenneth E; Jacks, Yvette R
Subject: RE: Meeting with Huma

As per my instructions from Kenny, last night at 7:30 I turned off "Anti-Spam" on our bridgeheads, [] and []. If it is really necessary to to the other settings, let's setup a conference call later today.

D7

TREND MICRO™ ScanMail™ for Microsoft™ Exchange

Current server: SESSML32U Real-time monitor Server Management

Summary	Anti-Spam
Virus Scan	<input type="checkbox"/> Enable Anti-Spam
Attachment Blocking	Target Action
Content Filtering	Spam Catch Rate
Anti-Spam	Spam detection level: medium ▾
Manual Scan	<input checked="" type="checkbox"/> Detect Phishing ⓘ
Scheduled Scan	Approved Senders
▶ Updates	Email from addresses or domain names in this list will not be treated as Spam:
▶ Alerts	(for example: domain.com, user@domain.com, or @domain.com)
▶ Reports
▶ Logs	<input type="button" value="Add"/>
▶ Quarantine	@state.gov <input type="button" value="Remove"/>
▶ Administration	

Jay E. Gazlay
 Worldwide Information Network Systems
 Office: 202.647.4525 | Mobile: [REDACTED]
 In accordance with E.O. 13526 this message is not classified.

D6

From: Lawrence, Thomas W
Sent: Wednesday, December 22, 2010 8:34 AM
To: Mensah, Ebenezer T; Jammes, Trey
Cc: Wilson, Nancy L; LaVolpe, Kenneth E; Gazlay, Jay E
Subject: RE: Meeting with Huma

Thank you for all your efforts. We are grateful for your persistence on this matter and we are ready to assist in any manner.

To officially indicate the obvious from S/ES-IRM, we view this as a Band-Aid and fear it's not 100% fully effective. We are eager for Trend Micro to fully resolve, quickly. I want an update on the status by 1500 today, even if it's nothing changed.

Trey do you agree with my position? If not, please simply contact me direct. Thanks

tom

From: Mensah, Ebenezer T
Sent: Wednesday, December 22, 2010 8:10 AM
To: Lawrence, Thomas W; Jammes, Trey; LaVolpe, Kenneth E; Gazlay, Jay E
Cc: Wilson, Nancy L
Subject: RE: Meeting with Huma

The ant-phishing filters settings should be left as it is now, it should be the 3 filters on the instruction I sent Jay and his team yesterday. Just so you know, we're still working with Trend Micro on some of these filter related issues and will update you if any changes are necessary. Thanks.

Ebenezer Mensah

Exchange Systems Engineer
IRM/OPS/MSO/EML
SkyePoint Decisions Support Contractor
(202) 634-0278
Mensahel@State.Gov

From: Lawrence, Thomas W
Sent: Tuesday, December 21, 2010 4:01 PM
To: Jammes, Trey; LaVolpe, Kenneth E; Gazlay, Jay E; Mensah, Ebenezer T
Cc: Wilson, Nancy L
Subject: RE: Meeting with Huma

Thanks, we are discussing now. What about the anti-phishing filter? Same?

From: Jammes, Trey
Sent: Tuesday, December 21, 2010 2:39 PM
To: Lawrence, Thomas W; LaVolpe, Kenneth E; Gazlay, Jay E; Mensah, Ebenezer T
Cc: Wilson, Nancy L
Subject: RE: Meeting with Huma

Turning off the anti-spam filter on the server is recommended at least to verify that it resolves the problem (assuming this is recurring). Instructions were sent to Jay. It is also recommended to restart the SMTP service when the Categorizer is not processing messages properly.

Trey Jammes

From: Lawrence, Thomas W
Sent: Tuesday, December 21, 2010 1:36 PM
To: LaVolpe, Kenneth E; Gazlay, Jay E; Mensah, Ebenezer T
Cc: Wilson, Nancy L; Jammes, Trey
Subject: RE: Meeting with Huma

Huma is asking for an update. Do we have one?

From: LaVolpe, Kenneth E
Sent: Tuesday, December 21, 2010 10:01 AM
To: Gazlay, Jay E; Mensah, Ebenezer T
Cc: Wilson, Nancy L; Jammes, Trey; Lawrence, Thomas W
Subject: RE: Meeting with Huma

Just looping Trey and Tom into this.

From: Gazlay, Jay E
Sent: Tuesday, December 21, 2010 9:56 AM
To: Mensah, Ebenezer T
Cc: LaVolpe, Kenneth E; Wilson, Nancy L
Subject: RE: Meeting with Huma

1. Version of ScanMail ?

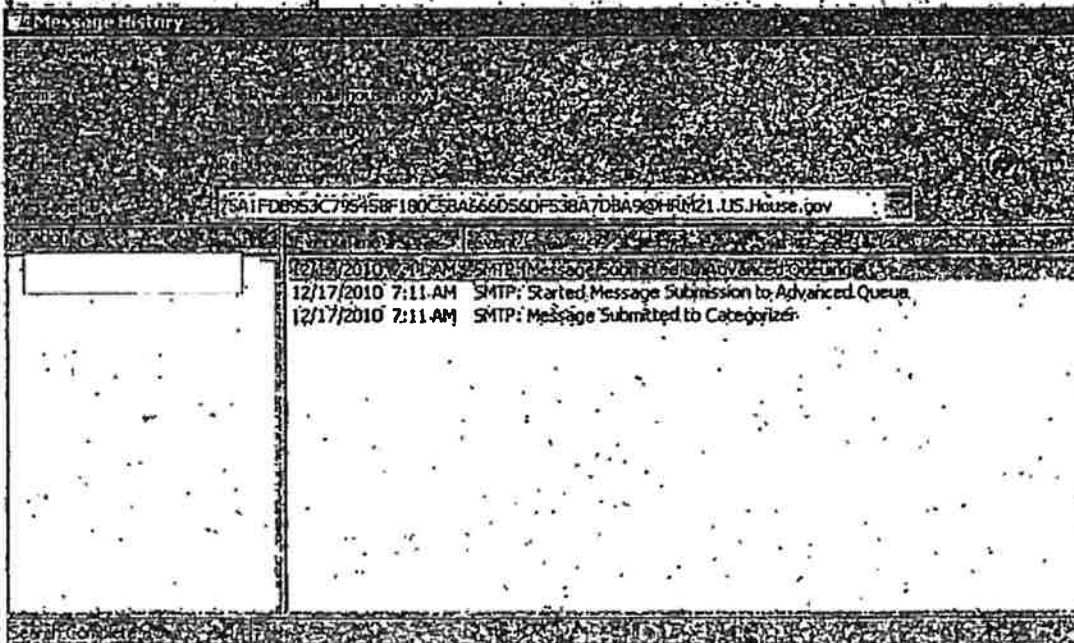
Component	Current Version
<input checked="" type="checkbox"/> Virus pattern	7.703.00
<input checked="" type="checkbox"/> Advanced Mail pattern	1.0.1.00
<input checked="" type="checkbox"/> InbellTrap pattern	0.147.00
<input checked="" type="checkbox"/> Anti-phishing pattern	0.1.1.00
<input checked="" type="checkbox"/> Scan engine	9.200.1012
<input checked="" type="checkbox"/> Spam engine	1.832.003
<input checked="" type="checkbox"/> Spam engine	61500.1024

2. Screenshot of message delivered to the categorizer on [redacted] as stated below?

D7



D7



D7

3. Screenshot of search criteria:

4. Which device or application were those failed delivery messages sent from (it doesn't seem to be Outlook sources but I may be wrong). It was sent from a blackberry.
5. Were there any attachment associated with any of these messages that were stripped off? Not that we are aware of.
6. Was there any reason I couldn't see the sender's email address in the very message, instead it appears as letter "H". Any reason the address wasn't there? I don't know, the email address was HOR22@clintonemail.com

Jay E. Gazlay
Worldwide Information Network Systems
Office: 202.647.4525 | Mobile: [REDACTED]
In accordance with E.O. 13526 this message is not classified.

D6

From: Mensah, Ebenezer T
Sent: Tuesday, December 21, 2010 8:29 AM
To: Gazlay, Jay E
Cc: LaVolpe, Kenneth E; Wilson, Nancy L
Subject: RE: Meeting with Huma

All I was saying was I didn't find a trace of any of the reported messages but more information may help. So, here are the specific questions that may help as well:

7. Version of ScanMail?
8. Screenshot of message delivered to the categorizer on [REDACTED] as stated below?
9. Which device or application were those failed delivery messages sent from (it doesn't seem to be Outlook sources but I may be wrong)?
10. Were there any attachment associated with any of these messages that were stripped off?
11. Was there any reason I couldn't see the senders email address in the very message, instead it appears as letter "H". Any reason the address wasn't there?

D7

Ebenezer Mensah
Exchange Systems Engineer
IRM/OPS/MSO/EML
SkyePoint Decisions Support Contractor
(202) 634-0278
Mensahet@State.Gov

From: Gazlay, Jay E
Sent: Monday, December 20, 2010 4:14 PM
To: Mensah, Ebenezer T
Cc: LaVolpe, Kenneth E; Wilson, Nancy L
Subject: RE: Meeting with Huma

EB,

With so many questions in-line, I am worried that I might not properly cover each of them. Can you please provide a bullet-list of what information you need to be successful?

Regards,

Jay E. Gazlay
Worldwide Information Network Systems
Office: 202.647.4525 | Mobile: [REDACTED]
In accordance with E.O. 13526 this message is not classified.

D6

From: Mensah, Ebenezer T
Sent: Monday, December 20, 2010 2:52 PM
To: Gazlay, Jay E
Cc: LaVolpe, Kenneth E; Wilson, Nancy L
Subject: RE: Meeting with Huma

Jay,

I did use different scenario to track down some of the specific message in question, as presented routing between the sender and recipient (s), but I did not find or get any specific data to analyze the cause as well as determine if these messages actually came through our system or got stuck somewhere on it's transmission or if it did not hit any of DOS Bridgeheads at all. I did use multiple methods to track down messages through all and selected BHs to try and at least get something that seem to have been deliver into the databases where the recipient mailboxes are homed but none gave me anything concrete on the subject matter. However, I saw other messages that were sent from the same users that came through from same senders without problem.

This bring us to the point where we want to know "the differences" or what types of messages were delivered without problem and those that cannot be traced from the sender point of view and how these two different messages were sent in the first place (either BB, MAPI client, OWA or through other application or device). Also, let' remember certain attachment or message sizes over 30MB will be refuse delivery.

Lastly, I will like to at least get more information or screenshot of the messages that were stuck in the categorizer, I'm not sure why I did not find them or see those as well but if I could get more information on that I think that will help our process as well (it was resent at 7:11 am by sender to huma, received and also "submitted to Categorizer" on sessml32u).

At this point I'm not relating any of these to ScanMail yet until I get answers to some the questions as well as the version of ScanMail version running on your [redacted] and other SES Exchange BH servers. Thanks.

D7

Ebenezer Mensah
Exchange Systems Engineer
IRM/OPSM/SO/EML
SkyePoint Decisions Support Contractor
(202) 634-0278
Mensahet@State.Gov

From: Gazlay, Jay E
Sent: Monday, December 20, 2010 9:05 AM
To: Mensah, Ebenezer T
Cc: LaVolpe, Kenneth E; Wilson, Nancy L
Subject: FW: Meeting with Huma

Eb,

Can you please check on your side for any information regarding this message. Please do not forward the attachment to other IRM staff without checking with our Gov't first.

Thank you,

Jay E. Gazlay
Worldwide Information Network Systems
Office: 202.647.4525 | Mobile [redacted]
In accordance with E.O. 13526 this message is not classified.

D6

From: [Pajlanb, Bryari M](#)
Sent: Friday, December 17, 2010 4:56 PM
To: Gazlay, Jay E
Cc: Lawrence, Thomas W
Subject: RE: Meeting with Huma

[Here is the one from the 13th. I looked for the one on the 14th and could not find one with a blank subject. I did find one sent at that time to Iona and Huma with subject Friday which I can grab for you.]

-Bryan

From: Gazlay, Jay E
Sent: Friday, December 17, 2010 4:26 PM
To: ~~Pagliano, Bryan M~~
Cc: Lawrence, Thomas W
Subject: RE: Meeting with Huma

~~I was actually looking for a full copy of the message including the header information. If at all way I can provide it to our AW people for analysis.~~

Regards,

Jay E. Gazlay
Worldwide Information Network Systems
Office: 202.647.4525 | Mobile:
In accordance with E.O. 13526 this message is not classified.

D6

From: ~~Pagliano, Bryan M~~
Sent: Friday, December 17, 2010 4:25 PM
To: Gazlay, Jay E
Cc: Lawrence, Thomas W
Subject: RE: Meeting with Huma

~~So when you say "full header" you mean the SMTP transaction, right? Only the recipient receives the header info after it is written from being passed from server to server to get to the recipient. I believe.~~

~~Bryan~~

From: Gazlay, Jay E
Sent: Friday, December 17, 2010 4:20 PM
To: ~~Pagliano, Bryan M~~
Cc: Lawrence, Thomas W
Subject: RE: Meeting with Huma

~~Can you please check and provide full header information on the message from the 1432~~

~~On 12/17/2010 4:22 PM, "Bryan M. Pagliano" <bpagliano@clintonemail.com> sent a message to humas@clintonemail.com and Mallmoroll@state.gov at 10:03 pm. The subject line was blank. Huma received at @clinton address, but I should not receive on her state.gov account.~~

Jay E. Gazlay
Worldwide Information Network Systems
Office: 202.647.4525 | Mobile:
In accordance with E.O. 13526 this message is not classified.

D6

From: Pagliano, Bryan M
Sent: Friday, December 17, 2010 4:19 PM
To: Gazlay, Jay E

Cc: Lawrence, Thomas W
Subject: RE: Meeting with Huma

So, I am on the system now and looking at the logs.

I can send you the text of the log if you want, but that message was sent through vance.state.gov which replied that the recipients were okay [redacted] for both recipients, [redacted] at 12/13/2010 07:10:02

D7

While I am on, I can look up others messages

From: Gazlay, Jay E
Sent: Friday, December 17, 2010 1:36 PM
To: Pagliano, Bryan M
Subject: FW: Meeting with Huma

Jay E. Gazlay
Worldwide Information Network Systems
Office: 202:647:4525 | Mobile: [redacted]
In accordance with E.O. 13526 this message is not classified.

D6

From: LaVolpe, Kenneth E
Sent: Friday, December 17, 2010 12:04 PM
To: SES-IRM_Tech
Subject: Re: Meeting with Huma

Jay and Nancy could you look into this immediately. This should trump all other activities. You can also have a 1 day extension on heat tickets.

From: Almodovar, Cindy T
Sent: Friday, December 17, 2010 11:17 AM
To: SES-IRM_Tech
Cc: SES-IRM_PO-Mgt
Subject: Meeting with Huma

I met with Huma for about 30 minutes to go over mail issues. She gave me some examples listed below, but also, things are inconsistent. But issue #1 is of an e-mail which was sent to her twice this morning, did get received on [redacted] but was not delivered. See details below.

D7

~~(I have a contact for the @Clintonemail.site, his name is Bryan Pagliano and he actually now works for State) but he apparently set all of this up~~

General	Organization	Phone State	Number Of	E-mail Address
Name:	First: <input type="text" value="Bryan"/> Initials: <input type="text" value="H"/> Last: <input type="text" value="Packard"/>	Phone:		
Family:	<input type="text" value="Packard, Bryan H"/> Alias: <input type="text" value="Packard/BH"/>	Phone:		
Address:	<input type="text" value="American Red Cross Building"/>	Office:	<input type="text" value="Special Advisor"/>	
City:	<input type="text" value="Washington"/>	Company:	<input type="text" value="US Department of State"/>	
State:	<input type="text" value="DC"/>	Department:	<input type="text" value="Information Resource Management"/>	
Zip code:	<input type="text" value="20005"/>	Office:	<input type="text" value="SA-Room 7H1207"/>	
Country/Region:	<input type="text" value="United States"/>	Assignee:		
		Phone:	<input type="text" value="202-634-3481"/>	

Huma sent several tests from her clintonemail account to Lona and myself – they were received. But there are many messages and responses not received.

2. She sent a message this morning from her state.gov account to cheftwan@mail.house.gov.
 - Recipient responded, but she didn't get the response. I found that the response arrived and is on as "submitted to Categorizer" at 6:47 this morning.
 - It was resent at 7:11 am by sender to huma, received and also "submitted to Categorizer" on

D7
D7

~~3. On 12/13, hdr22@clintonemail.com sent a message to huma@clintonemail.com, sullivanj@state.gov and sterntd@state.gov at 7:09 am. The subject line was Kudos and Espinosa. Huma received the message at the Clinton address, but the State recipients did not receive.~~

4. On 12/14, hdr22@clintonemail.com sent a message to huma@clintonemail.com and Valmoroll@state.gov at 10:03 pm. The subject line was blank. Huma received at Clinton address, but Lona did not receive on her state.gov account.



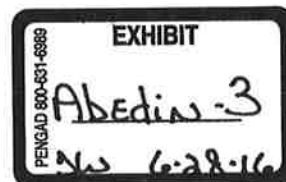
Cindy Trodden Almodovar
S/ES Supervisory Systems Administrator
S/ES-IRM POEMS Help Desk
U.S. Department of State
Phone: 202-647-8328 | Fax: 202-647-8191

From: Justin Cooper
To: Abedin Huma
Date: Sunday, January 09, 2011 2:57:19 AM

RELEASE IN FULL

REVIEW
AUTHORITY:
Archie Bolster,
Senior Reviewer

I had to shut down the server
Someone was trying to hack us and while they did not get in I didnt want to let them have the chance
to.
I will restart it in the morning.



[REDACTED]

From: Justin Cooper <Justin@presidentclinton.com>
Sent: Sunday, January 09, 2011 2:59 PM
To: Abedin, Huma; Doug Band
Subject: Re:

RELEASE IN
PART D6

Thanks. We were attacked again so I shut it down for a few min. It shld be working now

REVIEW AUTHORITY: Archie
Bolster, Senior Reviewer

----- Original Message -----

From: Abedin, Huma <AbedinH@state.gov>
To: Justin Cooper; Doug Band
Sent: Sun Jan 09 14:33:52 2011
Subject:

My clinton berry not working.
I got your email about varkey
I emailed him earlier about plans.
He only responded a few minutes ago saying they could come. Will close the loop.

From: Abedin, Huma
Sent: Monday, January 10, 2011 1:31 AM
To: Sullivan, Jacob J; Mills, Cheryl D
Subject: Don't email hrc anything sensitive. I can explain more in person.

RELEASE IN FULL

REVIEW AUTHORITY: Archie Bolster,
Senior Reviewer

[REDACTED]

From: Lee, Purcell N
Sent: Tuesday, March 17, 2009 1:35 PM
To: Waggoner, Kevin L; Bentel, John A; Scott, Andrew C
Cc: Duncan, Bruce E
Subject: Secretary Residential Installation Hotwash
Attachments: Secretary Residential Installation Hotwash.docx

RELEASE IN PART
D6

REVIEW AUTHORITY: Archie
Bolster, Senior Reviewer

Attached is the agenda/talking points for the hot wash.

PENGAD 800-831-6888
EXHIBIT
Abedins-4
NW 6-28-16

Secretary Residential Installation Hotwash

RELEASE IN FULL

1. Equipment location:

- a. **Unclassified Partner System:**
 - i. **Server: Basement Telephone Closet**
 - ii. **Telephone Set: Various rooms**
- b. **Classified Fax:**
 - i. **STE/Secure Fax: Third Floor**
- c. **Classified Red Switch: Third Floor**

REVIEW AUTHORITY: Archie
Bolster, Senior Reviewer

2. Status of Installation:

- a. **Unclassified Partner Telephone System: Completed.**
- b. **Classified STE/Fax: Completed**
- c. **Classified Red Switch: Completed**
- d. **Unclassified Ops Drop: Verizon is still working to finalize path.**
- e. **CMS Classified Video: Declined**
- f. **CMS Classified Voice: Declined**

3. Issues:

- a. **T1 Telephone Services were not available upon arrival**
- b. **Analog lines (2) for the Partner system was not ordered.**
- c. **Red Switch Technicians arrived 2 days later than scheduled.**
- d. **SDS Data Cable was left in Washington**
- e. **Former President's wireless headset was disconnected**
- f. **Secretary Clinton's headset noise cancelling was not selected**
- g. **Speed Dial for Secretary Clinton Unclassified telephone was not working properly.**
- h. **Secretary's Clinton's business lines were not set up in a "Hunt Group"**

RELEASE IN FULL

From: H <hrod17@clintonemail.com>
Sent: Sunday, September 20, 2009 12:43 PM
To: 'ValmoroLJ@state.gov'
Subject: Re: Schedule

Just a mtg.

----- Original Message -----

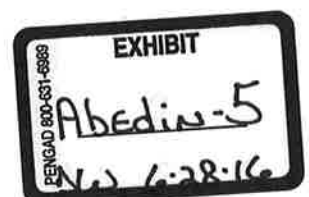
From: Valmoro, Lona J <ValmoroLJ@state.gov>
To: H; Huma Abedin
Cc: H2
Sent: Sun Sep 20 12:12:23 2009
Subject: Re: Schedule

Either Mondays or Tuesdays are best -- at one point, you had mentioned a meal. Would you still like to do that or just a normal meeting?

----- Original Message -----

From: H <HDR22@clintonemail.com>
To: Valmoro, Lona J; Huma Abedin <Huma@clintonemail.com>
Cc: H2 <hr15@att.blackberry.net>
Sent: Sun Sep 20 10:53:10 2009
Subject: Schedule

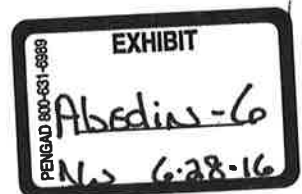
I need to find a time to meet w the Undersecretaries every week. What do you suggest?



RELEASE IN FULL

From: H <hrod17@clintonemail.com>
Sent: Thursday, May 7, 2009 8:09 PM
To: 'JilolyLC@state.gov'
Subject: Email addresss

Pls help me update my berry w email addresses of key staff like Monica, Kris, etc.



RELEASE IN FULL

From: H <hrod17@clintonemail.com>
Sent: Tuesday, September 8, 2009 7:08 PM
To: 'JilotyLC@state.gov'
Subject: Re: Blackberry

Thank you.

----- Original Message -----

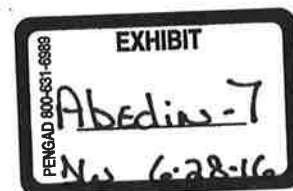
From: Jiloty, Lauren C <JilotyLC@state.gov>
To: H
Sent: Tue Sep 08 17:10:25 2009
Subject: RE: Blackberry

I added a bunch of names today - about 40 or so. I have a few more to do, and will do those tomorrow when I can get your blackberry back. I'm also making a master list for you of everyone I've added/updated so you can see.

-----Original Message-----

From: H [mailto:H0222@clintonemail.com]
Sent: Monday, September 07, 2009 4:00 PM
To: Jiloty, Lauren C
Subject: Blackberry

Tomorrow pls add more State names--all under and asst secretaries and the special assts/exec crew. Thx.



RELEASE IN FULL

From: Hanley, Monica R
To: Abedin, Mona
Subject: Fw: S berry
Date: Tuesday, August 30, 2011 4:19:15 PM

SSHRC@state.gov

REVIEW AUTHORITY: Archie Bolster,
Senior Reviewer

----- Original Message -----

From: Bentel, John A
Sent: Tuesday, August 30, 2011 04:15 PM
To: Hanley, Monica R
Subject: RE: S berry

Monica: We actually have an account previously set up: SSHRC@state.gov. There are some old emails but none since Jan '11 -- we could get rid of them. You should be aware that any email would go through the Department's infrastructure and subject to FOIA searches.

Let me know if any questions and what you would like us to do.

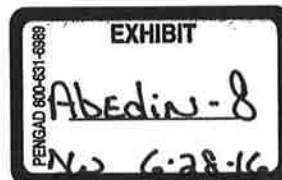
Thankst
John

SSU
This email is UNCLASSIFIED

----- Original Message -----

From: Hanley, Monica R
Sent: Tuesday, August 30, 2011 3:59 PM
To: Bentel, John A
Subject: S berry

Do you know what her email address would be on a state dept berry?



From: Abedin, Huma
To: Mull, Stephen D
Subject: Re: S Communications
Date: Tuesday, August 30, 2011 9:34:07 PM

RELEASE IN PART
B7(E)

Its pretty silly and she knows it.

From: Mull, Stephen D
Sent: Tuesday, August 30, 2011 05:18 PM
To: Abedin, Huma
Subject: RE: S Communications

.Thanks for reminding all of this very helpful context!!! ☺

From: Abedin, Huma
Sent: Tuesday, August 30, 2011 17:17 PM
To: Mull, Stephen D; Mills, Cheryl D
Cc: Kennedy, Patrick F; Hanley, Monica R
Subject: Re: S Communications

REVIEW AUTHORITY: Barbara
Nielsen, Senior Reviewer

Steve - let's discuss the state blackberry, doesn't make a whole lot of sense.
As for the equipment, the commo team was limited in some capacity because we did not have authorization from owners of residence to install equipment. We did it regardless. Additionally, as S knows, the team didn't have access to the property until a couple of hours before S arrived. Finally, as even the white house attested, this was a pretty wide spread problem, not just affecting us. So we should bear that in mind.

From: Mull, Stephen D
Sent: Tuesday, August 30, 2011 01:39 PM
To: Mills, Cheryl D
Cc: Abedin, Huma; Kennedy, Patrick F; Hanley, Monica R
Subject: S Communications

EXHIBIT
LUCENS
4
5/10/16 PPS

Cheryl,

Thanks again for alerting me to the communications issues the Secretary has been having. Here's a status report:

- On the immediate problem of the Secretary's not being able to have her calls transferred, [redacted]

B7(E)

[redacted]
The technicians are onsite now
[redacted]

- On the more long term issue, I've asked our team to develop an enhanced

EXHIBIT
Abedin-9
NW 6-28-16

package of capabilities and equipment that we would propose deploying with the Secretary to be as closely co-located as possible with her when she is on travel away from her usual residences. The package will include things that anticipate the normally unexpected such as hurricanes, power outages, earthquakes, locusts, etc, such as generators, uninterrupted power supplies, supplementary satellite capabilities, including satellite phones for when local infrastructure fails (as it did in NY over the weekend).

Separately, we are working to provide the Secretary per her request a Department issued Blackberry to replace her personal unit which is malfunctioning (possibly because of her personal email server is down). We will prepare two versions for her to use - one with an operating State Department email account (which would mask her identity, but which would also be subject to FOIA requests), and another which would just have phone and internet capability. We're working with Monica to hammer out the details of what will best meet the Secretary's needs.

Please let me know if you need anything more for now, and I'll be in touch with the above longer term options soon.

Thanks,

Steve

From: H <HDR22@clintonemail.com>
Sent: Saturday, November 13, 2010 1:40 PM
To: Huma Abedin <Huma@clintonemail.com>
Subject: Re:

RELEASE IN FULL

Let's get separate address or device but I don't want any risk of the personal being accessible.

REVIEW AUTHORITY: Archie Bolster, Senior Reviewer

Also, I didn't get an ops email, only the Jake one. I'm forwarding my response to Dan on Kyi.

— Original Message —

From: Huma Abedin
To: H
Sent: Sat Nov 13 13:21:53 2010
Subject: Re:

We should talk about putting you on state email or releasing your email address to the department so you are not going to spam. Its not the phone message system, its the device delay.

— Original Message —

From: H
To: Huma Abedin
Sent: Sat Nov 13 13:04:47 2010
Subject: Re:

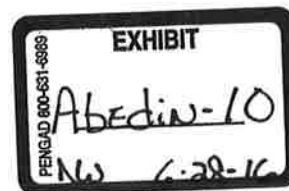
I emailed back yes but ops told me they didn't hear from you so didn't make call which I just ordered them to do. Also Jake said hed been trying to reach me and ops said they had called you about that too. This is not a good system.

— Original Message —

From: Huma Abedin
To: H
Sent: Sat Nov 13 12:28:17 2010
Subject: RE:

Kouchner can do 12:45
ok?

HA 09/01/2015



From: Huma Abedin [redacted]
Sent: Sunday, March 22, 2009 11:57 AM
To: hdr22@clintonemail.com; JilotyLC@state.gov
Subject: Re. Follow up

B6

RELEASE IN PART
B6

We've discussed this.
I can explain to you when I see u today.

-----Original Message-----
From: H <hdr22@clintonemail.com>
To: Huma Abedin, Lauren Jiloty <JilotyLC@state.gov>
Sent: Sun Mar 22 08:58:21 2009
Subject: Follow up

Dear Lauren and Huma--

I have just realized I have no idea how my papers are being treated at State Who manages both my personal and official files?

I am sending out material the way I did w Lauren in the Senate, but I don't know what's happening w it all. For instance, I've sent a few things to Cheryl but she says she hasn't recd them Does Claire manage this or does it all go to Joe? Are there personal files as well as official ones set up? If I don't write anything on a paper--as I mostly don't--Lauren knew how to file it all in the Senate. I'm sending out a mix which sometimes Claire and other times Lauren picks up from the out box. What happens then is a mystery to me!

So I think we need to get on this asap to be sure we know and design the system we want. Let me know what you both think. Thx

EXHIBIT
Abedin-11
No. 6-28-16
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