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# Transcript of Heather Samuelson

**Date:** June 13, 2019

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

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Transcript of Heather Samuelson  
Conducted on June 13, 2019

1	3
1 IN THE UNITED STATES DISTRICT COURT	1 A P P E A R A N C E S
2 FOR THE DISTRICT OF COLUMBIA	2 ON BEHALF OF PLAINTIFF:
3 ----- x	3 RAMONA COTCA, ESQUIRE
4 JUDICIAL WATCH, INC., :	4 LAUREN M. BURKE, ESQUIRE
5 Plaintiff, :	5 ERIC LEE, ESQUIRE
6 v. : Civil Action No.	6 JUDICIAL WATCH, INC.
7 U.S. DEPARTMENT OF STATE, : 14-01242 (RCL)	7 425 Third Street, SW
8 Defendant. :	8 Suite 800
9 ----- X	9 Washington, DC 20024
10	10 (202) 646-5172
11 Videotaped Deposition of HEATHER SAMUELSON	11
12 Washington, DC	12 ON BEHALF OF DEFENDANT:
13 Thursday, June 13, 2019	13 STEPHEN M. PEZZI, ESQUIRE
14 10:10 a.m.	14 U.S. DEPARTMENT OF JUSTICE
15	15 FEDERAL PROGRAMS BRANCH
16	16 1100 L Street, NW
17	17 Washington, DC 20005
18	18 (202) 305-7583
19	19
20 Job No.: 230029	20
21 Pages 1 - 261	21
22 Reported by: Debra A. Whitehead	22
2	4
1 Videotaped Deposition of HEATHER SAMUELSON,	1 A P P E A R A N C E S C O N T I N U E D
2 held at the offices of:	2 ON BEHALF OF DEFENDANT:
3	3 ELIZABETH SHAPIRO, ESQUIRE
4 PLANET DEPOS - DC	4 U.S. DEPARTMENT OF JUSTICE
5 1100 Connecticut Avenue, NW	5 CIVIL DIVISION
6 Suite 950	6 20 Massachusetts Avenue, NW
7 Washington, DC 20036	7 Washington, DC 20530
8 (888) 433-3767	8 (202) 514-2205
9	9
10	10 ON BEHALF OF THE WITNESS:
11	11 HAL BREWSTER, ESQUIRE
12 Pursuant to notice, before Debra A. Whitehead,	12 BRIAN L. STEKLOFF, ESQUIRE
13 an Approved Reporter of the United States District	13 CALI COPE-KASTEN, ESQUIRE
14 Court and Notary Public of the District of Columbia.	14 WILKINSON WALSH & ESKOVITZ
15	15 2100 M Street, NW
16	16 10th Floor
17	17 Washington, DC 20036
18	18 (202) 847-4000
19	19
20	20
21	21 ALSO PRESENT:
22	22 JEREMY DINEEN, Video Specialist

Transcript of Heather Samuelson  
 Conducted on June 13, 2019

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9	1 behalf of the Department of State and the witness 2 in her capacity as a former State Department 3 official. 4 MR. PEZZI: Stephen Pezzi, from the 5 Department of Justice, also on behalf of defendant 6 the Department of State, and on behalf of the 7 witness in her official capacity as a former 8 government employee. 9 MS. COPE-KASTEN: Cali Cope-Kasten, on 10 behalf of Heather Samuelson. 11 MR. STEKLOFF: Brian Stekloff, on behalf 12 of Ms. Samuelson. 13 MR. BREWSTER: Hal Brewster, also on 14 behalf of Ms. Samuelson. 15 THE WITNESS: Heather Samuelson. 16 VIDEO SPECIALIST: Thank you. 17 The court reporter today is Debbie 18 Whitehead, representing Planet Depos. Would the 19 reporter please swear in the witness. 20 HEATHER SAMUELSON, 21 having been duly sworn, testified as follows: 22 EXAMINATION BY COUNSEL FOR PLAINTIFF	11	1 MS. COTCA: Okay. And just in response 2 to that, I guess I would just state that obviously 3 Ms. Samuelson has her attorneys who are 4 representing her. You have the opportunity to 5 hear what's being asked. You have the opportunity 6 to object. And so if you believe that there is 7 any question that's delving on privilege, and if 8 you want to make an objection and an instruction 9 to your client, you certainly have the opportunity 10 to do so here today. 11 MR. BREWSTER: Thank you. 12 MS. COTCA: Okay. 13 All right. Is that it? 14 MR. BREWSTER: That's it. 15 BY MS. COTCA: 16 Q Okay. Ms. Samuelson, have you ever been 17 deposed before? 18 A I have not. 19 Q Okay. But you're an attorney? 20 A I am. 21 Q Okay. And just for the record, when did 22 you obtain your J.D., or become an attorney?
10	1 BY MS. COTCA: 2 Q All right. Good morning, Ms. Samuelson. 3 For the record, can you please state your name and 4 spell your name. 5 A Heather Samuelson. H-E-A-T-H-E-R 6 S-A-M-U-E-L-S-O-N. 7 MR. BREWSTER: Ramona, I don't want to 8 interrupt, but can I just memorialize what we 9 discussed before? 10 MS. COTCA: I was just going to give you 11 the opportunity to do that. 12 MR. BREWSTER: Okay. Thank you so much. 13 As counsel for plaintiff and I discussed 14 off the record beforehand, Ms. Samuelson is an 15 attorney for Hillary Clinton, and there may be 16 some testimony today that -- questions today that 17 try -- attempt to elicit privileged information, 18 or embark upon -- not that you're attempting to. 19 We will assert privilege if need be. But 20 if she does answer any question, whether privilege 21 is asserted or not, just the record reflect it is 22 not an intentional waiver of privilege.	12	1 A I -- I graduated law school in 2008. 2 Q Okay. Since you haven't been deposed 3 before, I'm sure you're familiar with the rules of 4 deposition, the ground rules for them. But I'll 5 just go through them briefly. 6 One is, you have been sworn in to 7 obviously been asked to answer everything 8 truthfully. 9 Is there any reason why you believe that 10 you would not be able to answer any of the 11 questions truthfully here today? 12 A No. 13 Q Okay. Also, you see the court reporter, 14 and she is here and she is transcribing everything 15 that's being said today on the record. So we have 16 a clear transcript, it's important that we don't 17 speak over each other. 18 I will do my best to not interrupt you as 19 you are answering your question -- my questions. 20 But, also, I would ask, sometimes you may 21 anticipate the question that's being asked, but 22 just let me finish asking it for purposes of

13

1 having a clear record.  
2 Is that fair?  
3 **A Yes.**  
4 Q Okay. Good.  
5 Also, you're doing very well, you're  
6 providing verbal responses. So nods of the head  
7 do not transcribe on -- onto the record. Okay?  
8 If you need a clarification as to any of  
9 the questions that I'm asking, please let me know.  
10 I'm happy to do so.  
11 If you do not ask for a clarification, I  
12 will assume that you understood the question  
13 that's being asked and that you answered the  
14 question that's being asked. Is that fair?  
15 **A That's fair.**  
16 Q Okay. Good.  
17 Also, your -- as your attorney just put  
18 on the record, there may be objections during the  
19 deposition. Some may go to privilege, some may go  
20 to -- for other purposes.  
21 Unless your attorney instructs you not to  
22 answer, you still must answer the question that's

14

1 being asked.  
2 I would also just ask if your attorneys,  
3 any of your attorneys do object, that you just  
4 give them the opportunity to finish their  
5 objection on the record, and then answer  
6 accordingly, unless they instruct you not to, not  
7 to answer. Okay?  
8 **A Okay.**  
9 Q Okay. If you need a break at any point,  
10 let me know. We're happy to take breaks.  
11 I would say, though, if there is a  
12 pending question, I would ask that you answer the  
13 question. Unless the break is to discuss whether  
14 privilege applies and you need to consult with  
15 your attorney in that regard. Okay?  
16 **A All right.**  
17 Q All right. Great.  
18 (Samuelson Deposition Exhibit 1 marked  
19 for identification, retained by counsel.)  
20 Q You have before you what's been marked as  
21 Exhibit 1, which is a copy of the subpoena that we  
22 served on you by sending to your attorneys in this

15

1 case.  
2 Do you recognize it?  
3 **A I do.**  
4 Q Okay. You've seen it before?  
5 **A I have.**  
6 Q Okay. Great. So let me just ask you,  
7 then, are you familiar with the lawsuit pending  
8 here today, which we asked for you to be deposed  
9 in?  
10 **A I am familiar with it.**  
11 Q Okay. What's your familiarity with it?  
12 **A I know that it is a FOIA-related suit.**  
13 Q Okay. Just to give you a little bit more  
14 background on it. It's a FOIA lawsuit that  
15 Judicial Watch filed against the State Department  
16 in which Judicial Watch asked for records from the  
17 Secretary -- Secretary Clinton's office at the  
18 time in regards to communications and updates that  
19 were provided to Susan Rice, or talking points  
20 provided to Susan Rice following the September 11,  
21 2012, attacks in Benghazi. Okay?  
22 **A Uh-huh.**

16

1 Q With respect to your deposition, I just  
2 want to cover a little bit in general terms the  
3 subject matters that we're going to cover.  
4 Discovery is not typical in FOIA; however, Judge  
5 Lamberth in this case permitted discovery and  
6 permitted Judicial Watch to take your testimony in  
7 this case on three topics that he granted  
8 discovery over.  
9 One is whether Secretary Clinton  
10 intentionally attempted to evade FOIA by using a  
11 private e-mail while Secretary of State. The  
12 second subject matter is whether State's efforts  
13 to settle this case in late 2014 and early 2015  
14 amounted to bad faith. And the third topic that  
15 he -- where he permitted discovery is whether  
16 State adequately searched for records responsive  
17 to Judicial Watch's FOIA request.  
18 And the court found that you, as a former  
19 State Department senior advisor, who helped  
20 facilitate State's receipt of Secretary Clinton's  
21 e-mails, was permitted to -- is permitted to be  
22 deposed on all of these topics. Okay?

<p>17</p> <p>1 <b>A Okay.</b></p> <p>2 Q All right. So just I think it makes</p> <p>3 sense to just -- we're going to start probably in</p> <p>4 the same order as the topics that the court</p> <p>5 outlined, because it makes sense chronologically.</p> <p>6 So we'll start off with general background of your</p> <p>7 employment and when you began at the State</p> <p>8 Department.</p> <p>9 So if you can tell me, when did you start</p> <p>10 working at the State Department?</p> <p>11 <b>A January 2009.</b></p> <p>12 Q Okay. And what was your position at</p> <p>13 State?</p> <p>14 <b>A I started off as an assistant working at</b></p> <p>15 <b>the White House liaison's office.</b></p> <p>16 Q Okay. Where is the White House liaison's</p> <p>17 office?</p> <p>18 <b>A What do you mean by "where"?</b></p> <p>19 Q I guess is it -- there are many bureaus</p> <p>20 and bigger offices. So I have a chart, which I'm</p> <p>21 actually -- we can just mark it. I can have you</p> <p>22 look at it.</p>	<p>19</p> <p>1 Q Okay. Thank you.</p> <p>2 And you said you began as an assistant in</p> <p>3 the White House liaison office.</p> <p>4 <b>A Yes.</b></p> <p>5 Q At some point did your position change?</p> <p>6 <b>A Yes. Later on I became the director of</b></p> <p>7 <b>the office.</b></p> <p>8 Q Okay. And when did you become the</p> <p>9 director of the office?</p> <p>10 <b>A I believe it was sometime in 2011.</b></p> <p>11 Q Who was the director of the office when</p> <p>12 you started there?</p> <p>13 <b>A We did not have a director when I started</b></p> <p>14 <b>there.</b></p> <p>15 Q Okay. How many -- why don't we back up a</p> <p>16 little bit. And how many employees were in the</p> <p>17 office when you started there?</p> <p>18 <b>A I started in the White House liaison</b></p> <p>19 <b>during a period of transition when Secretary</b></p> <p>20 <b>Clinton was transitioning to the office. I</b></p> <p>21 <b>believe there were four of us when I first</b></p> <p>22 <b>started.</b></p>
<p>18</p> <p>1 If you can identify where within the</p> <p>2 organizational chart your office was, that would</p> <p>3 be great.</p> <p>4 MR. BREWSTER: I'm going to object. This</p> <p>5 is likely outside of scope of permissible</p> <p>6 discovery.</p> <p>7 I will allow her to answer the question.</p> <p>8 MS. COTCA: Okay.</p> <p>9 (Samuelson Deposition Exhibit 2 marked</p> <p>10 for identification, retained by counsel.)</p> <p>11 <b>A So my office, the White House liaison's</b></p> <p>12 <b>office when I worked there -- I can't speak to</b></p> <p>13 <b>where it is today --</b></p> <p>14 Q Right.</p> <p>15 <b>A -- fell under the Under Secretary For</b></p> <p>16 <b>Management, M.</b></p> <p>17 Q Thank you. And that was Patrick Kennedy</p> <p>18 at the time?</p> <p>19 <b>A Correct.</b></p> <p>20 Q Okay. And your office was on the seventh</p> <p>21 floor?</p> <p>22 <b>A Correct.</b></p>	<p>20</p> <p>1 Q Okay. And you're saying during the</p> <p>2 transition. So that would have been before</p> <p>3 January of 2009?</p> <p>4 <b>A No; it was January 2009. It was just --</b></p> <p>5 <b>I just meant it was transitioning to the State</b></p> <p>6 <b>Department.</b></p> <p>7 Q Okay.</p> <p>8 <b>A Yeah. But I also served on the</b></p> <p>9 <b>transition team to the State Department.</b></p> <p>10 Q For Secretary -- when Secretary Clinton</p> <p>11 came on board?</p> <p>12 <b>A Correct.</b></p> <p>13 Q Okay. And what -- in what capacity did</p> <p>14 you serve on -- on the transition team?</p> <p>15 <b>A I helped with the appointments and</b></p> <p>16 <b>nominations process.</b></p> <p>17 Q Okay. All right. And so going back to</p> <p>18 the White House liaison's office when you started</p> <p>19 there.</p> <p>20 <b>A Uh-huh.</b></p> <p>21 Q You said there were four other employees?</p> <p>22 <b>A Correct.</b></p>

21

1 Q Okay. And who were they?  
2 A **I can't remember today.**  
3 Q Do you know their titles or their  
4 positions in the office?  
5 A **They were -- they were assistants, as I**  
6 **was.**  
7 Q Okay. And until 2011, when you became  
8 the director, did they also remain to be employed  
9 within the office with you?  
10 A **I have to -- I don't recall who was still**  
11 **there when I was director versus who was there**  
12 **when I first started. There was -- there was**  
13 **people that transitioned in and out.**  
14 Q Okay. How many people were employed in  
15 the office when you became the director of the  
16 office?  
17 A **I believe it was me and one to two**  
18 **others.**  
19 Q And do you know who they are?  
20 A **I -- so my -- I had two -- I had deputies**  
21 **that changed over time.**  
22 Q Okay. And who were the deputies that you

22

1 had who changed over time?  
2 MR. BREWSTER: Objection. Outside the  
3 scope of permissible discovery.  
4 I will allow her to answer, if she knows.  
5 A **Ethan Gelber.**  
6 Q And how do you spell his last name?  
7 A **G-E-L-B-E-R.**  
8 Q Okay.  
9 A **And Kelly Mehlenbacher.**  
10 Q And how do you spell Kelly's last name?  
11 A **I couldn't tell you today.**  
12 Q Mehlenbacher. Okay.  
13 But that's one last name, one full name,  
14 right, Mehlenbacher?  
15 A **Correct.**  
16 Q One word. Okay. Thank you.  
17 When -- did you -- sorry if you already  
18 stated this. But when in 2011 did you become the  
19 director?  
20 A **I don't remember the exact date.**  
21 Q Do you remember time frame of the year --  
22 A **I don't.**

23

1 Q -- seasons or months?  
2 A **I don't.**  
3 Q You don't. Okay.  
4 And who -- well, prior to becoming the  
5 director at the office, who did you report to?  
6 A **So I reported to Cheryl Mills when I**  
7 **first came in in 2009, and to Under Secretary**  
8 **Patrick Kennedy. I had dual reporting.**  
9 Q Okay. And how long did you report to  
10 Ms. Mills?  
11 A **So I reported to Ms. Mills from January**  
12 **2009 until sometime -- sorry, I'm just trying to**  
13 **remember. This is really -- this was ten years**  
14 **ago.**  
15 Q I understand. Take your time.  
16 A **So I was assistant in the White House**  
17 **liaison's office for the first year. Then I went**  
18 **into another office, the bureau of -- Bureau of**  
19 **Economic and Business Affairs for a few months.**  
20 **And then I went back to the White House liaison's**  
21 **office when I became the director of it.**  
22 **Again, it was some -- it may have been**

24

1 **even early -- late 2010. I really just don't**  
2 **remember at this point.**  
3 Q Okay. And that's all right. But let me  
4 just, so we have -- so I have an understanding.  
5 When you were as an assistant in the  
6 White House liaison's office, prior to moving to  
7 the Bureau of Economics and Business Affairs, did  
8 you throughout that time report to Ms. Mills as  
9 well as to Under Secretary Patrick Kennedy?  
10 A **I did. Correct.**  
11 Q Okay. Great. And then when you came  
12 back, you came back to the White House liaison  
13 office, that's when you came back as a director?  
14 A **Correct.**  
15 Q Okay. And who -- I guess, who approved  
16 your promotion to director?  
17 A **So it would have been approved by the**  
18 **White House, it would have been approved by Cheryl**  
19 **Mills, and it would have been approved by Patrick**  
20 **Kennedy.**  
21 Q Okay. And then as the director of the  
22 White House liaison's office in 2011, how long did

25

1 you stay there in that role?  
2 **A Until March 2013.**  
3 Q Okay. So from 2011 to 2013, while you  
4 were the director of the office, did you continue  
5 to report to Ms. Mills and Patrick Kennedy?  
6 **A Correct.**  
7 Q Okay. All right.  
8 Can you just provide in general  
9 background what -- I mean, obviously the name  
10 provides some understanding as to what the office  
11 did. But if you can provide in your own words as  
12 to what the office did.  
13 **A Yeah. Of course. So our office was**  
14 **primarily responsible for the recruitment,**  
15 **vetting, hiring, paperwork flow and process,**  
16 **onboarding of political appointees at the**  
17 **department.**  
18 **That ranged from Senate-confirmed**  
19 **positions to Schedule C's, to appointments at**  
20 **advisory boards.**  
21 **We also served as a general point of**  
22 **contact to the White House on other matters, as**

26

1 **needed.**  
2 Q Okay. Now, you also said you were  
3 involved in Secretary Clinton's transition team?  
4 **A That's correct.**  
5 Q And when did you become -- when did you  
6 become involved on the transition team?  
7 **A I believe -- again, this is a very long**  
8 **time ago at this point. But I believe it was**  
9 **sometime in late November, early December 2008.**  
10 Q Okay. Thank you.  
11 And briefly, what was -- what was your  
12 role, again, on the transition team?  
13 **A I didn't have a formal title, that I can**  
14 **remember. I might have. I just don't remember**  
15 **it. But I handled, again, appointments and**  
16 **nominations.**  
17 Q Okay. While you were on the transition  
18 team, was there any -- were there any discussions  
19 with respect to Secretary Clinton's use of e-mail  
20 while she was going to become Secretary of State?  
21 **A Not that I was involved in.**  
22 Q Were you aware of any such discussions at

27

1 the time?  
2 **A No.**  
3 Q Okay. Do you know Brian Pagliano?  
4 **A I do.**  
5 Q Okay. When did you first know  
6 Mr. Pagliano?  
7 **A So I -- sorry.**  
8 Q That's okay.  
9 **A I've actually known Brian since I was a**  
10 **teenager. We went to camp together.**  
11 Q Okay. We're not going to go that far  
12 back.  
13 Did you know Mr. Pagliano while you were  
14 on the transition team?  
15 **A I did.**  
16 Q Okay. And were you aware of his role  
17 with respect to providing IT services and  
18 assistance to Secretary Clinton at that time?  
19 **A I knew he provided IT services to the**  
20 **campaign. I did not know he provided IT services**  
21 **to Secretary Clinton personally at that time.**  
22 Q Okay. And Mr. Pagliano came on board to

28

1 the State Department as well. Is that right?  
2 **A That's correct.**  
3 Q Okay. Did you -- were you involved in  
4 his hiring as a Schedule C?  
5 **A I was involved in all Schedule C hirings**  
6 **as the White House liaison.**  
7 Q So were you involved in the hiring of  
8 Mr. Pagliano as well?  
9 **A Yes.**  
10 Q Did you, during your time in the -- well,  
11 let's focus on the early tenure of Secretary  
12 Clinton at the State Department.  
13 Between transition time, from transition  
14 time to, you know, first year of her tenure.  
15 Did you often -- or what was your  
16 interaction with Mr. Pagliano?  
17 MR. BREWSTER: Objection. Vague.  
18 Q You may answer.  
19 **A Could you -- could you ask that question**  
20 **again?**  
21 Q Sure. From the time period from when you  
22 started on the transition team for Secretary



29

1 Clinton through her first year into Secretary  
2 Clinton's tenure at the State Department, how  
3 often would you interact with Mr. Pagliano?  
4 **A So you're asking from December 2008 to**  
5 **December 2009?**  
6 Q Let's say November, December 2008 to the  
7 end of 2009. Correct.  
8 **A So the only interaction I recall having**  
9 **with him was his onboarding.**  
10 Q And what do you mean by "onboarding"?  
11 **A Oh, sorry. So as -- it would be the**  
12 **hiring process.**  
13 Q Okay. And then what about throughout the  
14 remainder, remaining tenure of Secretary Clinton  
15 through 2013; did you have any other interactions  
16 with Mr. Pagliano that you recall today?  
17 MR. BREWSTER: Objection. Relevance.  
18 Q You can answer.  
19 **A I'm sure I did. I'm sure I did. He was**  
20 **a Schedule C at the department. I'm sure I**  
21 **interacted with him. But I could not recall**  
22 **specific instances.**

30

1 Q Okay. Was there any interaction or  
2 discussions with Mr. Pagliano in reference to  
3 Secretary Clinton's e-mail or Huma Abedin's e-mail?  
4 MR. BREWSTER: Objection. Vague. Calls  
5 for speculation.  
6 **A I did not have any conversations with him**  
7 **about that.**  
8 Q Okay. Were you aware during this time  
9 period of any involvement that he had with respect  
10 to Secretary Clinton's e-mail or Huma Abedin's  
11 e-mail?  
12 **A Could you ask that question again?**  
13 Q I'll read it back.  
14 Were you aware during this time period of  
15 any involvement that he had with respect to  
16 Secretary Clinton's e-mail or Huma Abedin's  
17 e-mail?  
18 **A No, I was not aware at the time of any --**  
19 **of any involvement he had.**  
20 Q Okay. Mr. Pagliano was hired as a  
21 Schedule C to do what for the State Department?  
22 **A My recollection is that he was an advisor**

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1 **in the IRM bureau. I have to look up, see what**  
2 **that stands for. I think it's information and**  
3 **resource management.**  
4 Q Correct. And information resource  
5 management dealt with IT-type services for the  
6 State Department. Is that right?  
7 **A That's correct.**  
8 Q Okay. I just want to talk about what  
9 your interaction was with Secretary Clinton while  
10 you were an assistant, while you were first an  
11 assistant to the White House liaison's office.  
12 Did you have much interaction with  
13 Secretary Clinton during that time frame?  
14 **A I did not.**  
15 Q You did not.  
16 So I understand that Ms. Mills would have  
17 been your point of contact?  
18 **A That's correct.**  
19 Q Okay. And what about, then, when you  
20 became the director of the White House liaison's  
21 office; did you -- did you begin to have any more  
22 interaction with Secretary Clinton at that point?

32

1 MR. BREWSTER: Objection. Vague.  
2 **A I had more interaction with her, but it**  
3 **was still infrequent.**  
4 Q Okay. That would have been from 2011 to  
5 2013. Correct?  
6 **A Correct.**  
7 Q Okay. And when you say it was  
8 infrequent, can you describe what you mean by  
9 that?  
10 **A It was mainly in person, if I would see**  
11 **her in the halls.**  
12 Q Okay. Did you ever see Secretary Clinton  
13 carry a BlackBerry with her?  
14 **A Not that I recall.**  
15 **I'm sorry. Ever, or during my time at**  
16 **the State Department?**  
17 Q During your time. We're focusing on your  
18 time at the State Department.  
19 **A Okay. So, no, not during my time at the**  
20 **State Department, that I can recall.**  
21 Q Thank you for clarifying.  
22 Okay. So I want to go, again, through

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1 your background, because you served in different  
2 capacity that are relevant here.  
3 So you left the White House liaison's  
4 office you said in March of 2013?  
5 **A I did.**  
6 Q Okay. And where did you go from there?  
7 **A I went to White House counsel's office.**  
8 Q Okay. And who was the White house  
9 counsel at the time?  
10 MR. BREWSTER: Objection. Relevance.  
11 Q You may answer.  
12 **A Kathy Ruemmler.**  
13 Q And what was your position in the  
14 counsel's -- in the White House counsel's office?  
15 MR. BREWSTER: Same objection.  
16 **A I was assistant counsel.**  
17 Q You were assisting which counsel?  
18 **A I didn't have a specific counsel. That**  
19 **was just my title, assistant counsel.**  
20 Q Assistant counsel. Okay.  
21 So then if you could describe, what did  
22 you do as assistant counsel?

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1 MR. BREWSTER: Objection. Outside the  
2 scope of permissible discovery.  
3 I will permit the witness to answer.  
4 **A I continued working on vetting of**  
5 **nominations, as well as had an ethics and**  
6 **compliance portfolio.**  
7 Q And who did you report to in the White  
8 House counsel's office?  
9 MR. BREWSTER: Same objection.  
10 MR. PEZZI: Same objection.  
11 **A I reported to the deputy counsel.**  
12 Q And was that Caroline Shank at the time?  
13 **A It was not.**  
14 Q Who was the deputy counsel?  
15 **A It was Leslie Kiernan.**  
16 Q And how long did you remain at the White  
17 House counsel's office?  
18 **A Until April of 2014.**  
19 Q Did you begin at the White House  
20 counsel's office in March of 2013, right after you  
21 left the State Department?  
22 **A Yes. That following Monday.**

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1 Q I think that would have been March 11,  
2 2013.  
3 MR. BREWSTER: Objection. Misstates  
4 evidence.  
5 No, I'm wrong about the year. Forgive  
6 me. Objection withdrawn.  
7 MS. COTCA: I did actually pull up the  
8 calendar to figure out the date.  
9 Q And then in April of 2014 when you left  
10 the White House counsel, employment-wise where did  
11 you go after that?  
12 **A In May 2014 I became one of the**  
13 **Secretary's personal counsels.**  
14 Q Okay. And who hired you as her personal  
15 counsel?  
16 And when you say "personal counsel," you  
17 are mean an attorney?  
18 **A Correct. Sorry.**  
19 Q That's okay. And who hired you?  
20 **A Cheryl Mills.**  
21 Q And did you have a retainer agreement --  
22 MR. BREWSTER: Objection.

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1 Q -- when you were hired?  
2 MR. BREWSTER: Objection. Relevance.  
3 Q You may answer.  
4 **A I did.**  
5 Q Okay. And you still have, the retainer  
6 agreement, it's still current?  
7 MR. BREWSTER: Same objection.  
8 **A Correct.**  
9 Q And when you were hired by Ms. Mills to  
10 serve as personal counsel for Secretary Clinton,  
11 obviously we understand that you served in that  
12 capacity with respect to e-mails that Secretary  
13 Clinton returned to the State Department.  
14 Is that correct?  
15 I don't -- I don't want to go into any  
16 other matters that you represented or that you  
17 were hired to represent Secretary Clinton. I just  
18 want to establish your role with respect to  
19 reviewing her e-mails and the return of her  
20 e-mails to the State Department.  
21 MR. BREWSTER: Objection. Vague.  
22 Could you restate the question? I'm not

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1 entirely understanding what you're -- you're  
2 getting at here.  
3 Q In what legal matter were you hired by  
4 Ms. Mills to represent Secretary Clinton --  
5 MR. BREWSTER: Objection.  
6 Q -- in May of 2014?  
7 MR. BREWSTER: Objection. May call for  
8 privileged information.  
9 But you can answer, if you can do so  
10 without divulging privileged information.  
11 A I was hired to work on a number of  
12 matters in May 2014.  
13 Q Okay.  
14 A I think what you're asking, this matter,  
15 was not one of them in 20 -- in May 2014.  
16 Q Okay. Did you begin working for  
17 Secretary Clinton as her attorney for purposes of  
18 returning e-mails to the Secretary -- to the State  
19 Department?  
20 A No. I was already working for her as  
21 personal attorney prior to that.  
22 Q Correct. But did you begin working on

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1 that while you were her attorney?  
2 A Oh, yes. Yes.  
3 Q Okay. And when did you --  
4 A Sorry. I misunderstood your question.  
5 Q No problem.  
6 And when did you begin working  
7 specifically with respect to the Secretary's  
8 return of her e-mails to the State Department?  
9 A I believe that was in August 2014.  
10 Q For your appearance in this case, is  
11 Secretary Clinton paying your legal fees or any  
12 person or entity associated with Secretary Clinton  
13 or former President Clinton or the Clinton  
14 Foundation?  
15 MR. BREWSTER: Objection. Vague.  
16 Relevance. Outside the scope of permissible  
17 discovery.  
18 You may answer, if you know.  
19 A No.  
20 Q And we'll get back to the work that you  
21 started doing in August of 2014. I just wanted to  
22 get through the background here.

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1 With respect to Secretary Clinton's  
2 e-mails and also what your involvement may have  
3 been at the State Department with respect to  
4 certain FOIA requests that pertained to Secretary  
5 Clinton's e-mails, did you give any interviews to  
6 the Benghazi Select Committee?  
7 MR. BREWSTER: Objection. Form.  
8 A I was not interviewed personally by the  
9 Benghazi Select Committee.  
10 Q What do you mean by you personally?  
11 A Oh, I mean I represented Secretary  
12 Clinton in her interview with the Benghazi  
13 committee. That was very public. I was not  
14 interviewed by the Benghazi committee.  
15 Q Okay. I'm just asking about --  
16 A Yeah. Yes.  
17 Q -- interviews of you, personally. Okay?  
18 Was there a request by the committee that  
19 they interview you?  
20 MR. BREWSTER: Objection. Relevance.  
21 Calls -- or calls for testimony outside the scope  
22 of permissible discovery.

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1 MR. PEZZI: Same objection.  
2 Q You may answer.  
3 A I don't recall or know if they had a  
4 specific request to interview me.  
5 Q Okay. You did provide -- you were  
6 interviewed by the FBI on May 24, 2016, with  
7 respect to Secretary Clinton's e-mail. Correct?  
8 MR. BREWSTER: Objection. Outside the  
9 scope of permissible discovery.  
10 A I was interviewed by the FBI. That date  
11 sounds correct.  
12 Q Okay. Was there only one interview that  
13 the -- that you gave to the FBI?  
14 MR. BREWSTER: Same objection.  
15 A Yes.  
16 Q Okay. Then what about, are you familiar  
17 with State Department Office of Inspector General,  
18 state OIG?  
19 MR. BREWSTER: Objection. Relevance.  
20 A I'm familiar with the office.  
21 Q Okay. Great. You're aware that the OIG  
22 for the State Department investigated the State

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1 Department's processing of FOIA, FOIA requests,  
2 and came out with a report in January of 2016.  
3 Are you aware of that report?  
4 MR. BREWSTER: Objection. Vague.  
5 If you know.  
6 **A I'm aware of the report, but it's been a**  
7 **very long time since I've read it.**  
8 Q Sure. And that's fair.  
9 Was -- did the state OIG office request  
10 for an interview -- for your interview in doing  
11 that investigation?  
12 MR. BREWSTER: Objection. Outside the  
13 scope of permissible discovery.  
14 MR. PEZZI: Same objection.  
15 Q You may answer.  
16 **A I do not believe they do. I don't**  
17 **remember them asking for an interview.**  
18 Q Okay. If you know, if they would have  
19 asked for an interview, would that have been to  
20 you directly or to your attorneys, the request?  
21 MR. BREWSTER: Objection. Calls for  
22 speculation.

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1 Q If you know.  
2 **A I don't know.**  
3 Q Okay. And then the State Department's  
4 OIG office also did an investigation into  
5 specifically Secretary Clinton's e-mails, and that  
6 report came out in May of 2016.  
7 Are you familiar with that report?  
8 MR. BREWSTER: Objection. Relevance.  
9 Q You may answer.  
10 **A I am. I may be conflating the two**  
11 **reports, but I do recall a report on that as well.**  
12 Q Okay. Well, with respect to the May  
13 report specific to Secretary Clinton's e-mail use  
14 at the State Department, do you -- do you know if,  
15 did the state OIG contact you requesting your  
16 interview for that investigation?  
17 MR. BREWSTER: Objection. Relevance.  
18 Out -- outside the scope of permissible discovery.  
19 **A I don't remember.**  
20 (Samuelson Deposition Exhibit 3 marked  
21 for identification, retained by counsel.)  
22 Q Ms. Samuelson --

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1 **A Yes.**  
2 Q -- you have what's been marked as Exhibit  
3 2.  
4 No. I just want you to have an  
5 opportunity to just review it.  
6 **A Okay. I think this is Exhibit 3.**  
7 Q Oh, it's Exhibit 3. Thank you.  
8 MR. PEZZI: Was Exhibit 1 the subpoena?  
9 MS. COTCA: Exhibit 1 was the subpoena.  
10 MR. PEZZI: So the org chart is Exhibit  
11 2?  
12 MS. COTCA: Yes.  
13 BY MS. COTCA:  
14 Q I don't want to interrupt you, but I'm  
15 not going to ask you specific questions about the  
16 conversation between Secretary Clinton and General  
17 Petraeus. I just have more of a broader question.  
18 **A Okay.**  
19 Q Do you see as -- well, just for the  
20 record, so the record is clear, I'll describe this  
21 as an e-mail chain between Secretary Clinton and  
22 General David Petraeus beginning on January 10,

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1 2009, through January 28, 2009.  
2 Is that a fair representation of what's  
3 been marked as Exhibit 3?  
4 **A Could you repeat that? I'm sorry. I got**  
5 **distracted reading it.**  
6 Q That's okay.  
7 Just so the record is clear, I'll  
8 describe this exhibit as an e-mail chain between  
9 Secretary Clinton and General David Petraeus  
10 beginning on January 10, 2009, through January 28,  
11 2009.  
12 Is that a fair description of the  
13 document marked as Exhibit 3?  
14 **A Yes.**  
15 Q Okay. Thank you.  
16 I want to point you to the first e-mail  
17 from Secretary Clinton to General Petraeus at the  
18 top of the exhibit, dated January 29 -- 28, 2009,  
19 at 9:33 p.m. And I'll -- I'll read the points  
20 that I'm referring you to.  
21 She writes, "David, Sorry to be so tardy  
22 in responding. I've had BlackBerry blues. I

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1 can't use mine all day since my whole office is a  
2 skiff. I don't yet have a computer, and I had to  
3 change my address and lost some of my e-mail  
4 traffic."  
5 Do you see that?  
6 **A I do.**  
7 Q Okay. And in all the e -- and do you see  
8 the e-mail address that Secretary Clinton used to  
9 communicate with General Petraeus?  
10 **A I do.**  
11 Q Okay. And what's that e-mail address?  
12 **A It's hdr22@clintonemail.com.**  
13 Q Okay. And then do you see Secretary  
14 Clinton used a different e-mail address in all of  
15 the earlier e-mail messages --  
16 **A Yes.**  
17 Q -- reflected in this document.  
18 Is that right?  
19 **A Correct.**  
20 Q Okay. And what's that e-mail address?  
21 **A HR15@ATT.BlackBerry.net.**  
22 Q Okay. So I want to ask you first with

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1 respect to the e-mail -- the BlackBerry.net e-mail  
2 address in these earlier e-mails, was that  
3 Secretary Clinton's e-mail address prior to coming  
4 to the State Department?  
5 MR. BREWSTER: Objection. Vague.  
6 If you know.  
7 **A I believe so.**  
8 Q Okay. And then Secretary Clinton said  
9 that she changed her e-mail address to the Clinton  
10 e-mail.com.  
11 Were you aware of Secretary Clinton  
12 changing her e-mail address by January 28, 2009,  
13 to the Clintonemail.com?  
14 MR. BREWSTER: Objection. Question  
15 mischaracterizes the document. She hasn't said  
16 she changes it to Clintonemail.com.  
17 MS. COTCA: She said she changed her  
18 e-mail address, and that top e-mail is a different  
19 e-mail address.  
20 Q Are you aware of Secretary Clinton  
21 changing her e-mail address from ATTBlackBerry.net  
22 to Clintonemail.com?

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1 **A Am I aware that she changed --**  
2 Q Were you aware at that time?  
3 **A At that time?**  
4 Q During this time frame, yes.  
5 Not specifically that day, but during  
6 this time period.  
7 **A I was not.**  
8 MS. COTCA: And, counsel, I would just  
9 ask that you know that speaking objections are not  
10 permitted.  
11 You may object for the record, and that's  
12 fine. The transcript will speak for itself. But  
13 speaking objections and coaching the witness is  
14 not permitted.  
15 MR. BREWSTER: The objection was more for  
16 you. And I'm well within my rights to object.  
17 MS. COTCA: You're within your rights to  
18 object, but not speaking objections.  
19 Q Ms. Samuelson, when did you first become  
20 aware that Secretary Clinton used the e-mail  
21 address hdr22@clintonemail.com while she was at  
22 the State Department?

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1 **A I believe I first became aware when**  
2 **either she e-mailed me on personal matters, such**  
3 **as wishing me happy birthday, or when I**  
4 **infrequently would receive e-mails forwarded to me**  
5 **from others at the department that had that e-mail**  
6 **address listed elsewhere in the document.**  
7 Q Okay. And when -- I'm trying to gauge  
8 the time frame of when that was. Either the  
9 personal e-mail wishing you happy birthday, and  
10 then I want to move into the other e-mails.  
11 **A It was later on in her tenure, but I**  
12 **couldn't tell you exactly when.**  
13 Q And how about, you said that you  
14 infrequently received e-mails that were forwarded  
15 on to you from other State Department officials.  
16 Is that right?  
17 **A Correct.**  
18 Q Okay. And who were the State Department  
19 officials?  
20 **A I recall Cheryl Mills, but it could have**  
21 **been others.**  
22 Q Okay. Do you recall anybody else

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1 specifically other than Ms. Mills, sitting here  
 2 today?  
 3 **A Not sitting here today.**  
 4 Q Okay. And can you provide the time frame  
 5 of when Ms. Mills had forwarded you e-mails from  
 6 Secretary Clinton?  
 7 **A Again, it was really infrequent, and I**  
 8 **couldn't -- I couldn't tell you when.**  
 9 Q Okay. But it was while you were at the  
 10 State Department?  
 11 **A Correct.**  
 12 Q Okay. And it was for State Department  
 13 business. Correct?  
 14 **A Correct.**  
 15 Q Okay. When you were at the State  
 16 Department, did you have a BlackBerry issued?  
 17 **A I did.**  
 18 Q Okay. And you were provided a state.gov  
 19 e-mail account?  
 20 **A I was.**  
 21 Q Okay. Did you ever use any other e-mail  
 22 account for State Department business when you

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1 were at the State Department?  
 2 MR. BREWSTER: Objection. Relevance.  
 3 Outside the scope of permissible discovery.  
 4 MR. PEZZI: Same objection.  
 5 **A My recollection is I conducted my State**  
 6 **Department business on my state.gov account.**  
 7 Q Okay. Do you recall ever using a  
 8 personal e-mail account for State Department  
 9 business?  
 10 MR. BREWSTER: Same objection.  
 11 MR. PEZZI: Same objection.  
 12 **A I don't recall. I may have. But my**  
 13 **practice was to use my state.gov e-mail account.**  
 14 Q Okay. And when you used your personal  
 15 e-mail account, what was your practice with  
 16 respect to how to retain those e-mails for State  
 17 Department?  
 18 MR. BREWSTER: Same objection.  
 19 MR. PEZZI: Objection. Form.  
 20 MR. STEKLOFF: I mean, I'm not trying to  
 21 give a speaking objection, but she didn't say that  
 22 she used her personal e-mail for state purposes.

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1 MS. COTCA: She said she may have.  
 2 MR. STEKLOFF: Okay. But, I mean, you  
 3 have to ask questions that aren't just assuming  
 4 facts that haven't been testified to.  
 5 MS. COTCA: And I'm not.  
 6 MR. STEKLOFF: Okay.  
 7 Q Let's clarify your testimony,  
 8 Ms. Samuelson.  
 9 You -- your practice was to use your  
 10 state.gov e-mail account?  
 11 **A That's correct.**  
 12 Q Okay. Did you ever use a personal e-mail  
 13 account for State Department business during your  
 14 entire tenure at the State Department?  
 15 MR. BREWSTER: Objection. Relevance.  
 16 Outside the scope of permissible discovery.  
 17 MR. PEZZI: Same objection.  
 18 **A I don't want to say never. I may have.**  
 19 Q Okay. So in those situations --  
 20 **A I don't have a recollection of it.**  
 21 Q Okay.  
 22 **A If I did, I would have -- I would have**

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1 **likely forwarded it to my state.gov account or**  
 2 **cc'd my state.gov account.**  
 3 Q Thank you.  
 4 **A But I don't have a specific recollection.**  
 5 Q Okay. But your practice would have been,  
 6 if you did, to cc or to forward the e-mail to your  
 7 state.gov e-mail account?  
 8 **A Correct. Correct.**  
 9 Q Okay. Thank you.  
 10 Why was that your practice?  
 11 MR. BREWSTER: Objection.  
 12 MR. STEKLOFF: Then you're assuming -- I  
 13 just --  
 14 MS. COTCA: I have your objection on the  
 15 record.  
 16 I mean, go ahead and put your objection  
 17 on the record.  
 18 MR. STEKLOFF: She's giving you a  
 19 hypothetical because you're asking questions about  
 20 hypotheticals. So then if you say, why was that  
 21 your practice, it assumes that it happened.  
 22 MS. COTCA: No.

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1 MR. STEKLOFF: So I think you can ask if  
2 that happened, why would that have been your  
3 practice. But I don't think you can say why was  
4 that your practice and assume that it took place  
5 based on the testimony she just gave you.  
6 MS. COTCA: Okay.  
7 BY MS. COTCA:  
8 Q Why would that have been your practice?  
9 A **So it would be captured in the State  
10 Department system, and my own organizational  
11 purposes.**  
12 Q How about Justin Cooper; do you know who  
13 Justin Cooper is?  
14 A **I do.**  
15 Q Okay. And when did you start -- when did  
16 you first know Mr. Cooper?  
17 A **I don't remember when I first interacted  
18 with Justin.**  
19 Q Was it before Secretary Clinton became  
20 Secretary of State?  
21 A **It may have been. I just don't recall.**  
22 Q Okay. Did you interact with Mr. Cooper

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1 while you were at the State Department?  
2 A **I don't recall any interactions with him.**  
3 Q Okay. Ms. Samuelson, when you were at  
4 the White House liaison office, did you receive  
5 any training that was provided by Clarence  
6 Finney's office, who was the director, or deputy  
7 director, of S/ES-IRM with respect to records  
8 management?  
9 MR. BREWSTER: Objection. Form.  
10 MR. PEZZI: Objection. Form.  
11 A **I don't recall receiving training.**  
12 Q Okay. Did you receive training with  
13 respect to FOIA when you were at the State  
14 Department?  
15 A **I may have, but I don't recall.**  
16 Q Did you attend any records management  
17 workshops that Mr. Finney provided to the  
18 principal's office on the seventh floor while --  
19 while you were at the State Department?  
20 MR. BREWSTER: Objection. Form.  
21 A **I don't recall those.**  
22 Q You don't recall the workshop, or you

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1 don't recall if you attended?  
2 A **I don't recall a workshop.**  
3 Q Okay. During your time at the White  
4 House liaison's office at the State Department,  
5 what role did you have with respect to Freedom of  
6 Information Act requests?  
7 A **Our office was from time to time tasked  
8 with searching our own records in response to  
9 Freedom of Information Act requests.**  
10 Q Okay. And can you tell me what the  
11 process was when you were tasked?  
12 A **So when we received a task, we would look  
13 through our e-mails, we would look through our  
14 office share drive, and any paper files that we  
15 had in the office.**  
16 Q And who would task the office to do the  
17 search?  
18 MR. BREWSTER: Objection. Relevance.  
19 A **We'd receive a tasker from the State  
20 Department FOIA office.**  
21 Q Okay. Was that Clarence Finney and  
22 Jonathon Wasser?

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1 MR. BREWSTER: Objection. Calls for  
2 speculation.  
3 If you know.  
4 A **I don't recall.**  
5 Q Okay. Are you familiar with the IRM  
6 office for the seventh floor principals, which is  
7 labeled as S/ES-C?  
8 MR. PEZZI: Objection. Form.  
9 MR. BREWSTER: Objection. Form.  
10 Q Let me rephrase that.  
11 A **Okay.**  
12 Q Are you -- were you aware with the office  
13 who handled FOIA requests and correspondences  
14 coming into the Secretary's office and other  
15 principals on the seventh floor that's labeled  
16 S/ES-C?  
17 MR. PEZZI: Objection. Form.  
18 A **I'm not familiar with that acronym.**  
19 Q Okay. Do you know Clarence Finney?  
20 A **I don't recall knowing him when I was at  
21 the State Department. I have since seen his name  
22 in the press.**

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1 Q Okay. How about Jonathon Wasser?  
2 A No.  
3 **Well, I should say I don't recall. I**  
4 **mean, it was a long time ago.**  
5 Q Sure. That's fair.  
6 I'm just trying to understand where the  
7 tasker -- where the task came from with respect to  
8 FOIA requests that came to your office.  
9 When you say "the FOIA office," can you  
10 tell me more what you mean by that?  
11 A **So I thought it was within the A bureau.**  
12 Q Okay. And would that have been from IPS  
13 within the A bureau?  
14 A **That's -- is that information --**  
15 Q Program services, I believe.  
16 A **I -- I think that's correct. I don't**  
17 **remember.**  
18 Q Okay.  
19 A **It was a sheet that was sent. It was**  
20 **something that was sent to us.**  
21 Q Okay. All right. Okay. Thank you for  
22 that.

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1 And when you received the task, if the  
2 request pertained to your e-mails, would you  
3 conduct your own search of your own e-mails in  
4 response to the FOIA request?  
5 MR. BREWSTER: Objection. Relevance.  
6 Outside the scope of permissible discovery.  
7 A **We never received a request for my**  
8 **personal e-mails, or my state.gov e-mails, I**  
9 **should say, while I was there.**  
10 Q Okay. So how -- so let's back up.  
11 The tasker would send -- would ask to  
12 search e-mails. How would the office go about  
13 searching e-mails?  
14 MR. BREWSTER: Same objection.  
15 A **So if we got in a tasker that was related**  
16 **to, for example, the hiring of a particular**  
17 **appointee --**  
18 Q Okay.  
19 A **-- me and my office would look through**  
20 **our own e-mails to see if we had anything related**  
21 **to that.**  
22 Q Okay. Thank you.

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1 Then what about with respect to your  
2 involvement with FOIA requests; what involvement  
3 did you have with FOIA requests asking for records  
4 from Secretary Clinton's office?  
5 A **None.**  
6 Q Are you familiar with a FOIA request that  
7 came in to the State Department on December 6,  
8 2012, from an organization, the acronym is CREW,  
9 it stands for Citizens and -- for Responsibility  
10 and Ethics in Washington, I believe, that asks for  
11 records pertaining to Secretary Clinton's e-mails?  
12 MR. BREWSTER: Objection. Vague.  
13 If you know.  
14 A **I am familiar with it.**  
15 Q Okay.  
16 A **Mainly from the prep for this process.**  
17 Q "For this process," you mean for this  
18 deposition?  
19 A **Yes, for this deposition.**  
20 Q Okay. Yes. That's right. We have -- we  
21 have e-mails that show that you participated in  
22 the processing of that FOIA request at the State

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1 Department.  
2 And I want to ask you -- I want to move  
3 my questioning in asking you about your role with  
4 respect to that request.  
5 MR. PEZZI: Objection. Form.  
6 Q What do you recall about the request?  
7 MR. BREWSTER: Objection. Vague.  
8 A **Could you be more specific?**  
9 Q Well, do you recall -- you recall being  
10 made aware that the request came in.  
11 Do you recall how you were made aware of  
12 the request?  
13 MR. PEZZI: Objection. Form.  
14 MR. BREWSTER: Objection. Assumes facts  
15 not in evidence.  
16 Q Let me ask you, do you recall being made  
17 aware of the CREW request after it came in to the  
18 State Department?  
19 A **I -- I recall it, but my recollection --**  
20 **I don't recall at the time being made -- if, when,**  
21 **how I was made aware of that request.**  
22 Q Okay. All right. Why don't ...



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1 MR. BREWSTER: Ramona, I'm assuming this  
2 is going to be a long colloquy, and we've been  
3 going for 55 minutes. Would this be a good time  
4 for a break?  
5 MS. COTCA: Sure.  
6 VIDEO SPECIALIST: We are going off the  
7 record at 11:05.  
8 (A recess was taken.)  
9 VIDEO SPECIALIST: We are back on the  
10 record at 11:20.  
11 BY MS. COTCA:  
12 Q Ms. Samuelson, prior to the break I  
13 believe you testified that you reviewed some  
14 documents in regards to this CREW request  
15 pertaining to Secretary Clinton.  
16 Is that right?  
17 MR. PEZZI: Objection. Form.  
18 **A I -- I do not believe I testified that I**  
19 **reviewed documents prior to the break.**  
20 Q Prior to the deposition. For in  
21 preparation for your deposition, I understood your  
22 testimony to be that you had reviewed some

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1 documents pertaining to CREW's FOIA request  
2 relating to Secretary Clinton's e-mails.  
3 **A That's correct.**  
4 Q Is that correct?  
5 MR. BREWSTER: Objection.  
6 MR. PEZZI: Objection.  
7 MR. BREWSTER: Objection. Form.  
8 Q Okay. Thank you. Based on your review  
9 of the documents, what did you come to learn with  
10 respect to what your involvement was pertaining to  
11 that FOIA request?  
12 MR. BREWSTER: Objection. Potentially  
13 calls for privileged information.  
14 If you can answer without divulging  
15 attorney-client communications.  
16 **A What was your question again?**  
17 Q Based on your review of the documents,  
18 what did you come to learn with respect to what  
19 your involvement was pertaining to that FOIA  
20 request?  
21 MR. BREWSTER: Same objection.  
22 **A I saw that I was on e-mail traffic with**

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1 **Sheryl Walter.**  
2 Q Okay. And did that refresh at all your  
3 recollection with respect to -- well, let me reask  
4 it this way: And what were your discussions or  
5 communications with Sheryl Walter about, in  
6 regards to this FOIA request?  
7 MR. BREWSTER: Objection. Form.  
8 **A So I reviewed e-mails showing that she**  
9 **had been communicating with me on the request.**  
10 Q Okay. Do you -- and what were those  
11 specific communications about pertaining to the  
12 request?  
13 MR. BREWSTER: Objection.  
14 Is there a document you want to show her?  
15 MS. COTCA: I will. I just want to  
16 understand what her general understanding is with  
17 respect to her role after reviewing the documents.  
18 **A I'm happy to look at a particular**  
19 **document, if that's what you want to discuss.**  
20 Q Well, I have some specific questions with  
21 respect to some of the e-mails. But I just want  
22 to understand what your understanding is as to

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1 your role generally with respect to the CREW FOIA  
2 request.  
3 MR. BREWSTER: Objection. Form.  
4 **A So I -- I see from the traffic that she**  
5 **had communicated with me about this. I don't**  
6 **recall the specifics of our conversation.**  
7 Q Okay. Do you recall any requests for you  
8 to track this request for purposes of  
9 communicating with the White House about the  
10 request?  
11 MR. PEZZI: Objection. Form.  
12 MR. BREWSTER: Same objection.  
13 **A I don't recall that.**  
14 (Samuelson Deposition Exhibit 4 marked  
15 for identification, retained by counsel.)  
16 Q I show you what's been marked as Exhibit  
17 4. If you can take a look at that and let me know  
18 once you've had a chance to review it. You don't  
19 need to review it line by line.  
20 **A Okay.**  
21 Q But I just have a couple of questions  
22 about that.

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1 Did you review this document prior to  
2 your deposition today?  
3 MR. BREWSTER: Objection. Calls for  
4 privileged information.  
5 MS. COTCA: Are you instructing her not  
6 to answer?  
7 MR. BREWSTER: I am, yes.  
8 MS. COTCA: Okay.  
9 Q I'm sorry, what was this marked as?  
10 MR. BREWSTER: Exhibit 4.  
11 Q Exhibit 4. Okay. Ms. Samuelson, have  
12 you ever seen this e-mail chain before?  
13 MR. BREWSTER: Objection.  
14 Q You may answer.  
15 **A Yes, I have.**  
16 Q Okay. And just so the record is clear,  
17 this appears to be e-mail traffic between State  
18 Department officials about the CREW request that  
19 we're talking about, requesting records sufficient  
20 to show the number of e-mail accounts of or  
21 associated with Secretary Hillary Rodham Clinton  
22 and the extent to which those e-mail accounts are

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1 identifiable as those of or associated with  
2 Secretary Clinton. And that request was forwarded  
3 on to Ms. Mills on December 11, 2012, by Brock A.  
4 Johnson.  
5 Is that a fair representation?  
6 MR. BREWSTER: Objection. Form.  
7 **A Yes.**  
8 Q Okay. Thank you.  
9 Do you know who Brock Johnson is?  
10 **A I do.**  
11 Q Okay. Who is he?  
12 **A He worked at the State Department.**  
13 Q And what was his role at the State  
14 Department?  
15 **A So he started off in the special envoy's**  
16 **office for the closure of Guantanamo Bay. And**  
17 **then towards the end of Secretary's tenure he**  
18 **moved into the Secretary's office.**  
19 Q When did he move into the Secretary's  
20 office?  
21 **A I don't remember the exact date.**  
22 Q Was it in 2012, the year before?

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1 **A I believe it was in 2012.**  
2 Q 2012. Okay. And what was his position  
3 once he moved into the Secretary's office?  
4 **A I don't recall his exact position. He**  
5 **was a special assistant in the office.**  
6 **Sorry. I'm trying to speak up.**  
7 Q I should do the same.  
8 And he was a special assistant to whom?  
9 To whom did he report, if you know?  
10 MR. BREWSTER: Objection. Form.  
11 **A I believe he reported to Cheryl Mills,**  
12 **though I -- I'm not sure.**  
13 Q Okay. And were you involved in the  
14 hiring of Mr. Johnson by the State Department in  
15 2009?  
16 **A I was.**  
17 Q Okay. And --  
18 **A As I was with all Schedule C appointees.**  
19 Q Okay. So he was also a Schedule C  
20 appointee?  
21 **A Correct.**  
22 Q Okay. So were you aware that Doug Band,

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1 senior official at the Clinton Foundation,  
2 referred Mr. Brock to Cheryl Mills and Huma  
3 Abedin, asking that the State Department find a  
4 placement for him back in April of 2009?  
5 MR. BREWSTER: Objection. Form. Outside  
6 the scope of permissible discovery.  
7 If you know.  
8 MR. PEZZI: Same objection. And  
9 objection, foundation.  
10 **A I may have known he was recommended by**  
11 **Mr. Band at the time. I don't -- I don't recall.**  
12 Q Okay.  
13 **A He was somebody I -- I interviewed, and**  
14 **he also interviewed with his supervisor.**  
15 Q Who was his supervisor?  
16 **A When he was in the special envoy for the**  
17 **office of -- I'm going to mispronounce this. The**  
18 **office of closure for Guantanamo Bay, it -- I'm**  
19 **blinking on his name. He's a long-time**  
20 **ambassador. I'm blinking on his name.**  
21 Q That's okay.  
22 **A He -- he's a great guy.**

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1 Q Fair enough. And were you aware that  
2 Mr. Band asked Ms. Mills and Ms. Abedin that it's  
3 important to take care of him back in April of  
4 2009?  
5 MR. BREWSTER: Objection. Outside the  
6 scope.  
7 MR. PEZZI: Same objection. And  
8 objection, foundation.  
9 **A I don't recall that. We had a process by**  
10 **10 which we interviewed and hired everybody.**  
11 Q And are you aware that Ms. Abedin  
12 responded on April 22nd, 2009, saying, We have all  
13 had him on our radar. Personnel has been sending  
14 him options?  
15 MR. BREWSTER: Same objections.  
16 Q Are you aware of that?  
17 MR. PEZZI: Same objections.  
18 **A No. I mean, it was ten years ago. I**  
19 **19 don't recall.**  
20 Q And in the reference that personnel has  
21 been sending him options, would that personnel  
22 have included you?

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1 MR. BREWSTER: Objection. Form.  
2 MR. PEZZI: Same objection. And  
3 objection, foundation.  
4 **A Yes. It likely would have been either me**  
5 **5 or somebody in my office that he would have been**  
6 **6 communicating with.**  
7 Q Okay. And at that time, just so we're  
8 clear, you were an assistant in the White House  
9 liaison office. Correct?  
10 **A That's correct.**  
11 Q Okay. Thank you. Back to Exhibit 4.  
12 Do you know why Mr. Johnson forwarded  
13 this request to Cheryl Mills on December 11 of  
14 2012? And I'm referring to the Secretary e-mail  
15 from the top of the e-mail chain.  
16 MR. BREWSTER: Objection. Form.  
17 **A I do not.**  
18 Q Did you have any discussions with Ms. --  
19 with Ms. Mills after she received this request?  
20 **A I don't recall having discussions with**  
21 **21 her. I may have, but I don't recall.**  
22 Q Okay. Did Ms. Mills then forward this

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1 request over to you and ask you to do anything  
2 with respect to the request?  
3 MR. BREWSTER: Objection. Form.  
4 **A I don't recall her doing so.**  
5 (Samuelson Deposition Exhibit 5 marked  
6 for identification, retained by counsel.)  
7 Q I'll show you what's been marked as  
8 Exhibit 5:  
9 You can take a minute to just look at it.  
10 Let me know once you've had a chance to review it.  
11 And I see that you're on the right page.  
12 On Page 2 is where I'm going to point you to, and  
13 just have some questions about.  
14 **A Sorry. It's a long letter.**  
15 Q That's okay. I'm only going to actually  
16 ask you questions from -- that would pertain to  
17 the second and third paragraph --  
18 **A Okay.**  
19 Q -- of -- actually, just the second  
20 paragraph on the second page, in which your name  
21 appears.  
22 **A Okay.**

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1 Q Have you had a chance to review that?  
2 **A Yes, I've read those paragraphs.**  
3 Q Okay. Have you seen this -- well, so the  
4 record is clear, this is a letter from Chairman  
5 Charles Grassley for the committee on the  
6 judiciary, dated January 27, 2016, to then  
7 Secretary of State, Secretary Kerry.  
8 Is that an accurate representation?  
9 **A That's correct.**  
10 Q Okay. In specific, on the second page of  
11 this letter -- well, have you seen this letter  
12 before?  
13 MR. BREWSTER: Objection. Form.  
14 **A I have.**  
15 Q Okay. And particularly to the second  
16 paragraph of the second page, Senator Grassley  
17 states that, in regards to this CREW FOIA request,  
18 that Mr. Brock Johnson e-mailed the CREW request  
19 to Ms. Mills, and afterwards Ms. Mills, after she  
20 received the request, she transmitted it to  
21 Ms. Heather Samuelson, a senior advisor and White  
22 House liaison at the department.

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1 Do you see that?

2 **A I do.**

3 Q Okay. When did Ms. Mills transmit a copy

4 of this request to you?

5 MR. BREWSTER: Objection. Form.

6 Foundation.

7 MR. PEZZI: Same objections.

8 **A Again, I don't recall her transmitting**

9 **this to me.**

10 Q I understand you reported to Ms. Mills

11 during this time period, in December of 2012.

12 How was your mode of communication with

13 Ms. Mills? Was it in person, via e-mail, by

14 telephone?

15 MR. BREWSTER: Objection. Form.

16 **A All of the above.**

17 Q Fair enough. And how often would you

18 interact with Ms. Mills during this time frame?

19 **A Very regularly.**

20 Q Okay. So would you say daily?

21 **A Yes, daily.**

22 **I mean, there might have been days we**

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1 **didn't communicate. I'm on the record here.**

2 Q I understand. I understand.

3 Do you recall Ms. Mills asking you to

4 make queries as to the status of this CREW request

5 at any point?

6 **A I do --**

7 MR. BREWSTER: Objection. Form.

8 **A Can you ask your question again?**

9 **I'm sorry.**

10 Q Sure. Do you recall Ms. Mills

11 instructing you to make queries as to the status

12 of the CREW request?

13 **A I do not.**

14 Q And my question is not necessarily just

15 in December of 2012, but at any point from

16 December 6, 2012, until you left the State

17 Department. If you recall Ms. Mills asking you to

18 follow or to track this FOIA request.

19 **A I don't recall. She may have. I just**

20 **don't recall it.**

21 Q Okay. Did Ms. Mills, as you recall

22 today, ask you to track any other FOIA requests

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1 outside of the CREW request we're talking about

2 today?

3 **A Well, again, I don't recall her asking me**

4 **to track the FOIA -- this FOIA request.**

5 Q Okay.

6 **A I don't recall her asking me to track any**

7 **FOIA request.**

8 Q Right. So I just want to know, did

9 she -- do you have any recollection of her asking

10 you to track any other FOIA requests?

11 MR. BREWSTER: Objection. Form.

12 **A She may have. I just don't recall.**

13 Q Okay. And then Senator Grassley also

14 goes on to say that after Ms. Mills transmitted

15 the request to you, that then you tasked it to

16 Mr. Josh Dorosin, a State Department attorney.

17 Do you know who Josh Dorosin is?

18 **A I remember that he was an attorney at the**

19 **State Department.**

20 Q Anything else?

21 **A No.**

22 Q Okay. Did you task it to Mr. Josh

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1 Dorosin?

2 **A I don't know what the word "task" means.**

3 **I didn't have the authority to task anything to**

4 **Mr. Dorosin.**

5 Q Did you have conversations with

6 Mr. Dorosin with respect to following or keeping

7 you up to date about the CREW FOIA request?

8 MR. BREWSTER: Objection. Form.

9 **A I may have. I just don't recall.**

10 Q Okay. Did you interact often with

11 Mr. Josh Dorosin when you were at the State

12 Department?

13 **A No, I don't believe so.**

14 (Samuelson Deposition Exhibit 6 marked

15 for identification, retained by counsel.)

16 **A Okay.**

17 Q I've shown you what's been marked as

18 Exhibit 6, which is a -- an e-mail chain, again,

19 among State Department officials that include you.

20 You're not on all of the e-mails, but

21 you're on this e-mail chain about the CREW

22 request. And that starts off on December 20th,

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1 2012, from Ms. Sheryl Walter, ending on March 5th,  
2 2013, from Jonathan Davis to you, and then cc'ing  
3 other individuals.  
4 Is that a fair representation of what's  
5 been marked as Exhibit 6?  
6 **A Yes.**  
7 Q Okay. Prior to asking specific questions  
8 about this, other than Ms. Walter, do you recall  
9 if you spoke with any other State Department  
10 officials about this CREW request?  
11 MR. PEZZI: Objection. Form.  
12 MR. BREWSTER: Objection. Form.  
13 **A I don't recall.**  
14 Q Do you recall speaking with anybody at  
15 the White House about this request?  
16 **A I don't recall.**  
17 Q Did you often communicate with the White  
18 House about FOIA requests during your tenure at  
19 the State Department?  
20 **A I don't recall ever speaking to them**  
21 **about FOIA requests. As we talked about earlier,**  
22 **I was the White House liaison, so I was in regular**

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1 **communication with the Office of Presidential**  
2 **Personnel, the Office of White House Counsel, the**  
3 **Office of Cabinet Affairs. But I don't recall**  
4 **speaking with them about this FOIA request or any**  
5 **FOIA request.**  
6 Q Okay. You said you were in regular  
7 communication with the White House Counsel's  
8 Office. Who was your point of contact in the  
9 White House Counsel's Office?  
10 MR. BREWSTER: Objection. Form. Outside  
11 the scope of permissible discovery.  
12 **A I had multiple points of contact.**  
13 Q Okay. Who were they?  
14 **A I can't remember them today. I worked**  
15 **with the vetting team. I worked -- I had multiple**  
16 **points of contact there.**  
17 Q And I'm asking specific for the Office of  
18 White House Counsel's office. Is that correct?  
19 **A Right.**  
20 Q Okay. So we're speaking just about with  
21 respect to your points of contact for the White  
22 House Counsel's Office?

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1 **A Correct.**  
2 Q Based on your interactions with the  
3 office, who would -- who do you believe now you  
4 would have communicated at the White House  
5 Counsel's Office about a FOIA request?  
6 **A I don't know.**  
7 (A discussion was held off the record.)  
8 VIDEO SPECIALIST: We are going off the  
9 record at 11:42.  
10 (A recess was taken.)  
11 VIDEO SPECIALIST: Please stand by. We  
12 are back on the record at 11:46.  
13 BY MS. COTCA:  
14 Q Ms. Samuelson, when you were serving --  
15 during this time frame of December 2012 through  
16 March of 2013, you were in regular contact with  
17 the White House Counsel's Office. Is that a fair  
18 understanding of your testimony?  
19 **A Correct.**  
20 Q Okay. And would that -- would it be fair  
21 to say that you were in regular contact with the  
22 office on a weekly basis?

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1 **A Yes.**  
2 Q Okay. On a daily basis?  
3 **A Weekly, probably.**  
4 Q Okay. Give or take days?  
5 **A Give or take.**  
6 Q Okay. Fair enough.  
7 How big was the office during this time  
8 frame, the White House Counsel's Office?  
9 **A I couldn't tell you how big it was during**  
10 **that period.**  
11 Q Okay. How many different -- how many  
12 individuals did you regularly communicate with  
13 during this time period?  
14 **A Multiple.**  
15 Q Okay. A handful?  
16 **A I -- I couldn't say. This was -- again,**  
17 **this was six years ago. I just couldn't say.**  
18 Q Okay. And I'm not asking for a specific  
19 number. I'm just trying to get about how many  
20 individuals -- a -- a general account as to how  
21 many different people you spoke with within the  
22 office, to see if we can maybe narrow down the

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1 names of who you may have spoken with at the White  
2 House in regards to this FOIA request.  
3 MR. BREWSTER: Ramona, can I just have a  
4 running objection to outside the scope to this  
5 line of questioning, just with respect to -- just  
6 so I don't keep interrupting you?  
7 MS. COTCA: Sure.  
8 **A I do not recall who I spoke with**  
9 **regarding this FOIA request. I do not recall who**  
10 **I would have spoken with regarding this FOIA**  
11 **request.**  
12 Q And that's -- and I understand that. And  
13 there's been some time that's passed since this  
14 FOIA request. So that's why I'm asking, my  
15 question is, who you normally communicated with  
16 during this time frame.  
17 So would you have communicated with  
18 dozens of people at the White House Counsel, or  
19 would it be fewer during this time frame?  
20 **A Fewer than dozens. But the other thing I**  
21 **would say is that there was a lot of transition**  
22 **within that office. So I -- I don't even recall**

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1 **who I would have been speaking with or who was in**  
2 **the office at that time.**  
3 Q Okay. Would you have communicated with  
4 Deputy Counsel Leslie Kiernan during this time  
5 frame?  
6 **A I may have. I just don't recall.**  
7 Q Okay. How about with White House Counsel  
8 Kathryn Ruemmler, would you have communicated with  
9 her during this time frame?  
10 **A No. I never communicated with her**  
11 **directly during this time frame.**  
12 Q Okay.  
13 **A At least that I recall.**  
14 Q Sure. That's fair.  
15 Was Caroline Chang ever in the office  
16 serving in the White House Counsel's Office from  
17 December 2012 to March of 2013, if you know?  
18 **A I don't know.**  
19 Q Okay. Did you ever communicate with  
20 Ms. Chang during this time frame?  
21 MR. BREWSTER: Objection. Form.  
22 Q Still within the White House Counsel's

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1 Office?  
2 **A I believe I met with her when I was**  
3 **interviewing for a position there myself, but I do**  
4 **not recall speaking with her about anything work**  
5 **related.**  
6 Q Okay. And when did you interview with  
7 her for the position?  
8 MR. BREWSTER: Objection. Outside the  
9 scope.  
10 MR. PEZZI: Same objection.  
11 **A I don't recall. I started there in March**  
12 **2013, so it obviously would have been before that**  
13 **time. But I don't recall exactly when.**  
14 Q Okay. Okay. So if you can look at  
15 Exhibit 6.  
16 Have you had a chance to review it?  
17 **A I have.**  
18 Q Okay. And I want to point you to the  
19 first e-mail that appears on the e-mail chain,  
20 which is actually the last appearing in the  
21 document, from Sheryl Walter, dated December 20th,  
22 2012, at 12:38 p.m.

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1 She says there to -- or she wrote to  
2 Patrick Scholl and Rosemary Reid that White House  
3 called. Had we received a FOIA request from CREW  
4 on the topic of personal use of e-mail by senior  
5 officials.  
6 Do you know if Ms. Walter spoke with the  
7 White House in regards to the FOIA request either  
8 on December 20th, 2012, or prior?  
9 MR. BREWSTER: Objection. Form.  
10 Foundation.  
11 **A I don't know.**  
12 Q Okay. Did you ever speak with the White  
13 House on December 20th, 2012, or prior --  
14 **A December 20th, 2012?**  
15 Q That's the date of the e-mail.  
16 **A I spoke with them regularly, but --**  
17 Q I'm sorry. I didn't finish my question.  
18 Let me -- let me reask it.  
19 Did you speak with the White House either  
20 on December 20th, 2012, or prior, about CREW's  
21 FOIA request on the topic of personal use of  
22 e-mail by senior officials?

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1 **A I don't recall doing so.**  
2 Q Do you recall this request being  
3 discussed in your office during this time frame?  
4 MR. PEZZI: Objection. Form.  
5 Foundation.  
6 MR. BREWSTER: Same objections.  
7 **A My office being the White House liaison's**  
8 **office?**  
9 Q Yes.  
10 **A No.**  
11 Q Okay.  
12 **A This was not something I would have**  
13 **discussed with the others in the office.**  
14 Q Okay. Why? Why do you say that?  
15 **A They just had different responsibilities.**  
16 **I just don't think this is something I would have**  
17 **discussed with them.**  
18 Q Okay. And by "them" you mean the other  
19 assistants with -- well, actually, you were  
20 director at the time.  
21 **A Right.**  
22 Q All right. Do you know -- do you

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1 remember how many people worked under you in the  
2 office?  
3 **A I don't.**  
4 Q Okay.  
5 **A The number varied over time.**  
6 Q Okay. If the White House had called  
7 with -- would that call have gone through you as  
8 the director of the White House Liaison's Office?  
9 MR. BREWSTER: Objection. Form.  
10 MR. PEZZI: Same objection. And  
11 objection, foundation.  
12 **A So our office was the point of contact**  
13 **for a number of White House offices, if they had**  
14 **things -- matters they wanted to bring before the**  
15 **department.**  
16 **That being said, others in the department**  
17 **communicated with the White House regularly, too,**  
18 **on policy or other matters.**  
19 Q Okay. Did Ms. Mills communicate with the  
20 White House regularly, as far as you know?  
21 **A Yes.**  
22 MR. BREWSTER: Objection. Form.

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1 Q Did you answer?  
2 **A As far as I know, she did.**  
3 Q Okay. And do you know who her point of  
4 contact would have been in the White House Counsel  
5 during this time, if you know?  
6 MR. BREWSTER: Same objection.  
7 MR. PEZZI: Same objection.  
8 **A I don't know.**  
9 Q Okay.  
10 Okay. And then if I can point you to  
11 what appears as the second e-mail from the top on  
12 the third page of Exhibit 6. If you can -- and  
13 that's an e-mail from Ms. Walter to you, dated  
14 December 20th, 2012. Just a little bit over an  
15 hour and a half after the first e-mail appearing  
16 on this e-mail chain.  
17 Do you see that?  
18 **A I do.**  
19 Q Okay. And Ms. Walter wrote to you  
20 saying, you know, informing you that this CREW  
21 request came on our significant weekly FOIA report  
22 that her office sends to L and S/ES also.

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1 Do you know what the L refers to?  
2 **A I believe the L refers to the legal**  
3 **advisor's office.**  
4 Q Okay. And what about S/ES; what does  
5 that refer to?  
6 **A I believe that refers to the Executive**  
7 **Secretariat of the Department of State.**  
8 Q Okay. And do you know what is  
9 significant -- what she refers to as significant  
10 weekly FOIA report?  
11 MR. BREWSTER: Objection. Form.  
12 Foundation.  
13 **A Oh, is that a question? I'm sorry.**  
14 Q Yes. Do you know what -- what it is?  
15 **A No.**  
16 Q Okay. And she asked you if you wanted to  
17 be on that list.  
18 Had Ms. Walter ever asked you if you  
19 wanted to receive her office's significant weekly  
20 FOIA report prior to December 20th, 2012?  
21 **A She might have. I just -- I don't**  
22 **recall.**

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1 Q Okay.  
2 MR. STEKLOFF: And, Heather, only because  
3 you have a pen out, don't write on -- I know  
4 you're using it to track, but don't write on the  
5 exhibits.  
6 THE WITNESS: Okay. I'll put it aside.  
7 MR. STEKLOFF: Yeah. Unmarked is better.  
8 MS. COTCA: Yes. Thank you.  
9 MR. STEKLOFF: Yeah.  
10 Q Do you recall Ms. Walter asking you to be  
11 put on -- to receive this significant weekly FOIA  
12 report?  
13 **A I mean, I see she did in this e-mail. I**  
14 **don't recall her doing that prior to. She might**  
15 **have.**  
16 Q Okay.  
17 **A I just don't recall.**  
18 Q Okay. And do you recall how you  
19 respond -- whether you did ask to be put on the  
20 e-mail or not in response to Ms. Walter's e-mail  
21 on December 20th, 2012?  
22 **A I believe I did, but I'm not -- I'm not**

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1 **sure.**  
2 Q Okay. Further down in the same e-mail  
3 Ms. Walter stated, "More details below regarding  
4 this request. As a practical matter, given our  
5 workload, it won't be processed for some months."  
6 Do you see that?  
7 **A I do.**  
8 Q Okay. And when did Secretary Clinton's  
9 tenure end at the State Department?  
10 **A February 1st, 2013.**  
11 Q Okay. Was there any discussion that you  
12 had with Ms. Walter about needing to process this  
13 request prior to Secretary Clinton's departure  
14 from the State Department?  
15 MR. BREWSTER: Objection. Form.  
16 **A No. That's just -- that's not something**  
17 **I would have discussed with her.**  
18 Q Okay. And then she wrote, "Let me know  
19 if there are any particular sensitivities."  
20 Do you see that?  
21 **A I do.**  
22 Q Do you know what particular sensitivities

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1 Ms. Walter was referring to?  
2 MR. BREWSTER: Objection. Form.  
3 **A I don't.**  
4 Q Okay. And after reading this, does this  
5 at all refresh your recollection about this  
6 communication and conversations you may have had  
7 with Ms. Walter during this time frame?  
8 **A It didn't.**  
9 Q Did not.  
10 **A It's -- it's a long time ago. It's over**  
11 **six years ago at this point.**  
12 Q And I understand that it's been quite  
13 some time since this FOIA request. But was it  
14 normal practice for the director of IPS to inform  
15 you about FOIA requests pertaining to Secretary  
16 Clinton?  
17 MR. BREWSTER: Objection. Form.  
18 MR. PEZZI: Same objection.  
19 **A I don't recall her doing so. She may**  
20 **have in the past. I just don't recall it.**  
21 Q All right. Okay. Isn't this the type of  
22 request, if it wasn't done in a normal routine,

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1 that would stand out?  
2 MR. BREWSTER: Objection. Form.  
3 MR. PEZZI: Same objection.  
4 **A That would stand out to me?**  
5 Q Yes.  
6 **A No. I -- I received hundreds of e-mails**  
7 **a day. This was a busy time of the department**  
8 **because I was working on the transition to**  
9 **Secretary Kerry. So I -- I don't believe this is**  
10 **something that would have stuck out to me.**  
11 Q Was it normal routine for your office and  
12 the IPS office or the Secretary's office to be in  
13 contact with the White House about FOIA requests  
14 pertaining to Secretary Clinton's e-mail during  
15 her tenure at the State Department?  
16 MR. PEZZI: Objection.  
17 MR. BREWSTER: Objection. Form.  
18 MR. PEZZI: Same objection. And  
19 objection, foundation.  
20 **A No, I -- like I said before, I don't**  
21 **recall speaking to them about this FOIA request.**  
22 **I don't recall speaking to them about other FOIA**



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**1 requests. It doesn't mean it didn't happen; I**  
**2 just don't recall it today.**  
3 Q Okay. But you specifically followed up  
4 on this request. Correct?  
5 MR. PEZZI: Objection. Form.  
**6 A What do you mean by "followed up"?**  
7 Q You followed up with Ms. Walter after  
8 December 20th, 2012.  
**9 A I mean, I see that from the e-mail chain.**  
10 Q Right. So you did follow up on this  
11 request with Ms. Walter and others at the State  
12 Department. Correct?  
13 MR. PEZZI: Objection. Form.  
**14 A That's what the document shows.**  
15 Q Are you disputing that the documents are  
16 incorrect or --  
**17 A No. I -- I'm not disputing it. I'm just**  
**18 saying I don't have a -- I don't have a**  
**19 contemporaneous recollection of it. I see it in**  
**20 the document; I just don't recall it.**  
21 Q Okay. Did you, if you recall, did you  
22 communicate with Ms. -- with Ms. Walter as to any

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1 particular sensitivities for the department in  
2 responding to CREW's FOIA request?  
3 MR. BREWSTER: Objection. Form.  
4 MR. PEZZI: Same objection.  
**5 A No, I don't -- I don't know what she**  
**6 meant by "particular sensitivities." I don't -- I**  
**7 don't know.**  
8 Q Okay. All right. On -- on the first  
9 page of Exhibit 6, again, there is an e-mail from  
10 February 14, 2013, from Ms. Walter to you and  
11 Joshua Dorosin.  
12 Do you see that?  
**13 A I do.**  
14 Q Okay. And in there she wrote, "I believe  
15 we're still waiting to hear/see what DHS actual  
16 response was in the requester."  
17 Is DHS Department of Homeland Security?  
18 MR. BREWSTER: Objection. Form.  
**19 A I assume so, but I don't know.**  
20 Q Okay. Do you know why the Department of  
21 Homeland Security's response to a separate FOIA  
22 request was relevant to responding to CREW's

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1 request for Secretary Clinton's e-mail accounts?  
2 MR. BREWSTER: Objection. Form.  
3 Foundation.  
4 MR. PEZZI: Same objections.  
**5 A My recollection is the request did go to**  
**6 a number of agencies. But I don't -- but why they**  
**7 were following up with DHS, I don't know.**  
8 Q Okay. So can you tell me about this  
9 recollection that you're having about the request  
10 going to a number of agencies?  
**11 A Oh, it was in the e-mail track that ...**  
12 Q Okay.  
**13 A It was right here. Apparently other**  
**14 agencies have.**  
15 Q In Ms. Walter's initial e-mail from  
16 December 20th?  
**17 A Yeah.**  
18 Q Okay. Do you know why Ms. Walter or  
19 anybody else at the State Department was  
20 interested with respect to how other agencies  
21 responded to a similar request, but separate since  
22 it wasn't for Secretary Clinton's e-mail account?

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1 MR. BREWSTER: Objection. Form.  
2 Foundation.  
3 MR. PEZZI: Same objection.  
**4 A I -- I don't know. I don't ...**  
5 Q Why was the White House interested in  
6 this request?  
7 MR. BREWSTER: Objection. Form.  
8 Foundation.  
9 MR. PEZZI: Same objection.  
**10 A Sitting here today, I could not tell you**  
**11 why they -- why -- if or why they would be**  
**12 interested, or if or why she -- Sheryl would reach**  
**13 out to DHS.**  
14 Q Okay. Did you reach out to DHS about  
15 this request?  
**16 A I did not.**  
17 Q Okay. You have specific memory of the  
18 fact that you didn't reach out to DHS about this  
19 request?  
**20 A I do. Only because I don't know who at**  
**21 DHS I would have reached out to.**  
22 Q All right. And then further up the

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1 e-mail chain on March 4, 2013, from you to Joshua  
2 Dorosin, Sheryl Walter, and Jonathan Davis, cc'ing  
3 Brock Johnson, do you see that e-mail?  
4 **A I do.**  
5 Q Okay. You say that, "As Friday will be  
6 my last day, I'm adding Brock Johnson here who  
7 will track this request in my stead."  
8 At this point Mr. Johnson, where -- which  
9 office was he working in?  
10 **A So I don't know where he was as of March**  
11 **12 Secretary Clinton was there. But I do not know**  
13 **13 where he -- where he was on paper after March**  
14 **14 2013 -- after February 2013.**  
15 Q Okay. Do you know how long he continued  
16 to work for the State Department?  
17 **A I do not.**  
18 Q Okay. Why did you add Brock Johnson to  
19 follow this FOIA request back in March of 2013?  
20 **A So my recollection is, as it says here,**  
21 **21 is that I was leaving, I was departing to go to**  
22 **22 White House Counsel's Office. I was likely trying**

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1 to wrap up a lot of things that were still in my  
2 Inbox and make sure things didn't fall through the  
3 cracks. And Brock was somebody who I must have  
4 known was staying on board.  
5 Q So did you ask Mr. Johnson to keep  
6 following this request, then?  
7 **A I don't have a specific recollection of**  
8 **8 it. But based on this e-mail traffic, I must**  
9 **9 have.**  
10 Q Okay. Then once I believe on March 11  
11 you started at -- or somewhere around that time  
12 frame --  
13 **A Somewhere around that time.**  
14 Q -- you started at the White House  
15 Counsel's Office.  
16 Did you communicate with anybody at the  
17 State Department about this FOIA request, whether  
18 it was Brock Johnson or anybody else?  
19 **A I don't recall doing so, no.**  
20 Q Do you know what Department of Homeland  
21 Security's actual response was to the request that  
22 it received from CREW during this time?

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1 MR. BREWSTER: Objection. Form.  
2 Foundation.  
3 MR. PEZZI: Same objections.  
4 **A I don't.**  
5 Q Okay.  
6 (Samuelson Deposition Exhibit 7 marked  
7 for identification, retained by counsel.)  
8 MR. BREWSTER: Is this Exhibit 7?  
9 COURT REPORTER: It is Exhibit 7.  
10 MR. BREWSTER: Is this one document or a  
11 collection of documents?  
12 MS. COTCA: It's actually two documents.  
13 It's an e-mail chain and then also a -- it looks  
14 like an Outlook calendar entry.  
15 Q Ms. Walter -- Ms. Samuelson, have you had  
16 a chance to look at what's been marked as Exhibit  
17 8?  
18 **A Just give me one more second.**  
19 Q No problem.  
20 MR. PEZZI: Sorry. Just for the record,  
21 it's Exhibit 7. Right?  
22 MS. COTCA: Exhibit 7. I'm sorry. Thank

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1 you.  
2 Q You've had a chance to review it?  
3 **A Yes.**  
4 Q Okay. Great. And again just so the  
5 record is clear, this is two documents; an e-mail  
6 chain between you and Sheryl Walter in December of  
7 2012. And some of the e-mails are from Ms. Walter  
8 to other State Department officials.  
9 And then the second document is a  
10 conference call entry in regards to the CREW FOIA  
11 request.  
12 Is that an accurate description?  
13 **A That's accurate.**  
14 Q Okay. Thank you.  
15 Have you seen any of these documents  
16 before?  
17 MR. BREWSTER: Objection. Privilege.  
18 Calls for privileged information.  
19 MS. COTCA: I'm just asking if she's ever  
20 seen it. I'm not asking what she's seen in the  
21 presence of counsel.  
22 MR. BREWSTER: You can answer if you can

<p>101</p> <p>1 divulge it with -- if you can answer without 2 divulging privileged information. 3 Q Have you ever seen the document before? 4 A I -- 5 MR. STEKLOFF: I'm not trying -- can we 6 just -- I mean, if she's on the document, I think 7 you can ask her if she saw it in that time. But 8 then -- we're just trying to obviously avoid a 9 dispute about whether or not she saw it in prep 10 for the deposition. 11 MS. COTCA: Fair enough. 12 MR. STEKLOFF: So I think -- I'm -- 13 that's why we're just trying to be careful, so 14 there's no -- 15 MS. COTCA: Fair. 16 MR. STEKLOFF: -- dispute about whether 17 something is being waived. 18 MS. COTCA: Sure. Not a problem. 19 BY MS. COTCA: 20 Q Did you see this document back in 2012? 21 A <b>I mean, I'm obviously on the e-mail 22 chain, so I -- and responding to it. So I must</b></p>	<p>103</p> <p>1 Who were the other agencies that also 2 received the CREW request? 3 MR. BREWSTER: Object. Objection. Form. 4 MR. PEZZI: Same objection. 5 A <b>I don't recall. 6 The -- the only thing I do recall about 7 this is that the FOIA request was sent sometime 8 around when it was in the press that a different 9 cabinet Secretary was using an alias government 10 e-mail account. And that a request had been sent 11 to other agencies besides State. 12 I don't know who those other agencies 13 were. I just remember that it had some broad 14 distribution. 15 And again, I don't know if I'm 16 remembering that from 2012 or, because this has 17 been in the press for some time, if I'm 18 remembering it because I read that at a later 19 date.</b> 20 Q Did you receive any general guidance or 21 thoughts from any of the other agencies in regards 22 to the requests from CREW?</p>
<p>102</p> <p>1 <b>have seen it.</b> 2 Q Okay. And what about the conference call 3 entry in regards to the CREW FOIA request? 4 MR. BREWSTER: And you're asking in 2013? 5 MS. COTCA: Yes. In January of 2013. 6 Thank you. 7 A <b>I mean, that I can't be as certain of 8 whether I saw it or not. But I do see I'm on it.</b> 9 Q Okay. Let's go to the e-mail chain. I 10 have a couple of questions. 11 Do you see your e-mail from December 24, 12 2012, on Monday, from you to Ms. Walter, time 13 stamped 11:54? 14 Do you see that? 15 A <b>I do.</b> 16 Q Okay. And you say, "If you could add me 17 to that list, that would be great." 18 And then there's some redacted 19 information, "As I understand that other agencies 20 received similar request, I will let you know if I 21 receive any general guidance/thoughts from them on 22 this request."</p>	<p>104</p> <p>1 MR. BREWSTER: Objection. Form. 2 Foundation. 3 A <b>I don't recall. I don't -- I don't 4 recall.</b> 5 Q And then further up the e-mail chain 6 Ms. Walter writes to you on -- wrote to you on 7 December 27, 2012, asking if you could have a 8 quick conversation with her and Karen Finnegan, 9 her new division chief in charge of FOIA programs 10 and FOIA litigation, on the CREW request. 11 Do you recall having a conversation with 12 Sheryl Walter and Karen Finnegan about the CREW 13 request following this e-mail? 14 A <b>I do remember them calling me. I just 15 don't remember the specifics of the conversation. 16 Again, it was -- it was six-and-a-half years ago.</b> 17 Q And I understand that time has passed. I 18 guess that's why my question is, if there are 19 requests going to the various agencies in the 20 federal government about high-level officials 21 using alias e-mail accounts or other e-mail for 22 government business, isn't that the sort of thing</p>

Conducted on June 13, 2019

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1 that would stand out to you and in your memory?  
 2 MR. BREWSTER: Objection. Form.  
 3 MR. PEZZI: Same objection.  
 4 **A I think as I described before, I got -- I**  
 5 **got a lot of e-mails when I was in government.**  
 6 **And this was a particularly busy time because we**  
 7 **were transitioning from Secretary Clinton to**  
 8 **Secretary Kerry. Or at least I should say a**  
 9 **particularly busy time for me.**  
 10 **I -- this is not necessarily something**  
 11 **that would have stood out to me.**  
 12 Q Okay. Then you said you -- you do recall  
 13 Ms. Walter and Karen Finnegan calling you? Is  
 14 that -- is that accurate?  
 15 **A I don't know about Karen Finnegan.**  
 16 Q Okay.  
 17 **A I'm not sure who that is.**  
 18 Q Okay. You recall Ms. Walter calling you  
 19 about the request?  
 20 **A I do recall having a conversation with**  
 21 **her. I just don't recall the specifics or even**  
 22 **why she was calling me.**

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1 Q Okay. And how many conversations do you  
 2 recall having with Ms. Walter about the FOIA  
 3 request from CREW?  
 4 **A Only one. There could have been others.**  
 5 **I just don't remember.**  
 6 Q On the last page of Exhibit 7 is a  
 7 conference call entry on CREW FOIA request dated  
 8 for January 7, 2013, and the organizer was Sheryl  
 9 Walter, and required attendees is listed as Karen  
 10 Finnegan, yourself, and Ms. Walter listed herself  
 11 as that.  
 12 Do you see that?  
 13 **A I do.**  
 14 Q Okay. With respect to the phone call  
 15 that you recall, is it this time frame, or do you  
 16 have any specific recollection as to the time  
 17 frame for that call?  
 18 MR. BREWSTER: Objection. Form.  
 19 **A I -- again, this is six-and-a-half years**  
 20 **ago. I don't recall.**  
 21 Q Okay. Did you often interact with  
 22 Ms. Walter while you were at the State Department?

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1 **A I wouldn't say often. She had in the**  
 2 **past reached out to me, as I said before, about**  
 3 **our office searching our records in response to**  
 4 **FOIA requests.**  
 5 Q Okay. When you would communicate -- or  
 6 when you would interact with Ms. Walter, was there  
 7 a mode of communication that was more commonly  
 8 used either by phone or in person, or did it vary?  
 9 **A I don't remember having that many**  
 10 **interactions with her, to be honest.**  
 11 MR. BREWSTER: Ramona, we've been going  
 12 for about an hour. Are you staying on the same  
 13 topic, or are you moving on to a different one?  
 14 MS. COTCA: I am. There are a few more  
 15 documents relating to the request.  
 16 MR. BREWSTER: Is it going to be lengthy.  
 17 MS. COTCA: I want to ask some specific  
 18 questions about them.  
 19 MR. BREWSTER: Okay. Is it going to  
 20 be -- can you estimate how much more time it's  
 21 going to be?  
 22 MS. COTCA: Fifteen minutes.

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1 Do you want to take a break or --  
 2 MR. BREWSTER: Do you -- how are you  
 3 feeling?  
 4 THE WITNESS: I'm okay.  
 5 MS. COTCA: If you want to take a break,  
 6 we can.  
 7 MR. BREWSTER: If you -- if you think  
 8 it's going to be 15 minutes, let's keep going.  
 9 MS. COTCA: Okay. Don't hold me to it.  
 10 THE WITNESS: Actually, maybe I'll take a  
 11 quick snack break, because my stomach is growling.  
 12 VIDEO SPECIALIST: We're going off the  
 13 record at 12:18.  
 14 (A recess was taken.)  
 15 VIDEO SPECIALIST: We are back on the  
 16 record at 12:30.  
 17 (Samuelson Deposition Exhibit 8 marked  
 18 for identification, retained by counsel.)  
 19 MR. PEZZI: And just to be clear for the  
 20 record about something we discussed off the  
 21 record. I just wanted just to be clear that we've  
 22 made a supplemental document production in

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1 response to Judge Lamberth's order of yesterday  
2 evening on Judicial Watch's motion to compel. And  
3 the State Department believes that production  
4 completes State's response to -- with respect to  
5 the records at issue in the motion to compel.  
6 MS. COTCA: Yes. And we received it.  
7 Thank you.  
8 MR. BREWSTER: And then just since  
9 we're -- the production was made prior to lunch,  
10 if there's anything you want to ask questions  
11 about Ms. Samuelson, we would just ask that review  
12 occur over lunch so we don't have to come back for  
13 a second day.  
14 MS. COTCA: Oh, absolutely. Yes.  
15 BY MS. COTCA:  
16 Q Ms. Samuelson, you've been shown what's  
17 been marked as Exhibit 8, which is an e-mail chain  
18 between you and Sheryl Walter, and it includes  
19 other State Department officials, spanning from  
20 January 10, 2013, to January 26 of 2013.  
21 Is that a fair representation?  
22 A Yes.

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1 Q Okay. Have you had a chance to look at  
2 it?  
3 A I have.  
4 Q Okay. I have a few questions about this.  
5 Again, beginning at the bottom of the  
6 e-mail chain, which would be the first e-mail  
7 chronologically, from January 10, 2013, from  
8 Ms. Walter to you. And she cc'd Karen Finnegan,  
9 Jonathan Davis, and Gene Smilansky.  
10 Ms. Walter wrote to you if  
11 you received -- asked you if you "received any  
12 intel regarding what other agencies are doing  
13 regarding this FOIA request that seeks records  
14 about a number of e-mail accounts associated with  
15 the Secretary."  
16 Then she wrote, in open paren, "but isn't  
17 specifying personal e-mail accounts so we are as  
18 official accounts only," close paren?  
19 Do you see that?  
20 A I do.  
21 Q Okay. Did you receive any intel  
22 regarding what other agencies were doing with

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1 respect to this FOIA request?  
2 A I don't recall receiving any intel.  
3 Q Okay. Do you know -- did you have  
4 discussions with Ms. Walter with respect to her  
5 notation that the State Department would interpret  
6 the CREW request for official accounts only,  
7 rather than personal e-mail accounts?  
8 MR. BREWSTER: Objection. Foundation.  
9 A I don't recall talking with her about  
10 that.  
11 Q Did you have any concerns when you  
12 received this e-mail on January 10, 2013, about  
13 Ms. Walter's interpretation of the CREW request to  
14 ask for official accounts only of Secretary  
15 Clinton, even though Ms. Walter and others  
16 referred to the request internally as a request  
17 for Secretary's personal e-mail?  
18 MR. BREWSTER: Objection. Form.  
19 MR. PEZZI: Same objection. And  
20 objection, foundation.  
21 A I'm not sure I understand your question.  
22 What do you mean by "concerns"?

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1 Q Well, did you -- did it cause you pause  
2 or to question why Ms. Walter wrote in her e-mail  
3 to you that they are going -- that the State  
4 Department would interpret the CREW request for  
5 e-mail accounts as official accounts only, when  
6 Ms. Walter and other State Department officials in  
7 the e-mail traffic about the CREW request referred  
8 to the request as a request for Secretary's  
9 personal e-mail?  
10 MR. BREWSTER: Objection. Form.  
11 MR. PEZZI: Same objection. And  
12 objection, foundation.  
13 A I -- I don't recall having any -- to use  
14 your word, "concerns," or "pause."  
15 Q Further down, Ms. Walter wrote -- well,  
16 following what I just read, "We're considering  
17 contacting the requester to find out exactly what  
18 it is they're looking for. Do you have any  
19 concerns about that approach?"  
20 Do you know if Ms. Walter or anybody else  
21 at the State Department contacted Anne Weismann or  
22 anybody at CREW about the CREW request from

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1 December of 2012?  
2 MR. BREWSTER: Objection. Foundation.  
3 MS. COTCA: Same objection.  
4 **A I don't know, nor would I have had any**  
5 **concerns about them doing so.**  
6 Q Okay. Did you have any concerns about  
7 the top portion -- well, I think you just answered  
8 that, so I'll withdraw that question.  
9 Oh. Still on the same exhibit, Exhibit  
10 8. In a January 10, 2013, e-mail from you to  
11 Ms. Walter, which is on the first page, do you see  
12 that e-mail?  
13 **A I do.**  
14 Q Okay. It says, starting with, "Hi,  
15 Sheryl. White House Counsel was" look -- it's  
16 typed "locking." I believe it meant to be written  
17 as "looking into this for me."  
18 Do you see that?  
19 **A I do. It does look like a typo.**  
20 Q Okay. "I will circle back with them now  
21 to see if they have further guidance. Thanks,  
22 Heather."

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1 Again, if you recall now, who at the  
2 White House Counsel was looking into this for you?  
3 **A I don't recall speaking with them about**  
4 **it.**  
5 Q Well, do you know who at the White House  
6 Counsel was looking into it for you?  
7 **A I don't. I don't recall speaking with**  
8 **anyone there about it, so I don't know what I'm**  
9 **referring to here.**  
10 Q Do you know of anybody at the White House  
11 Counsel in January of 2013 who was looking into  
12 the CREW FOIA request sent to the State Department  
13 in December of 2012?  
14 MR. BREWSTER: Objection. Form.  
15 **A I -- I don't. I wasn't at the White**  
16 **House at the time.**  
17 Q Well, either -- whether you knew directly  
18 by speaking with anybody at the White House  
19 Counsel or in conversations with or learning from  
20 other third parties with respect to who was  
21 looking into this for you at the White House  
22 Counsel?

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1 MR. BREWSTER: Objection. Form.  
2 MR. PEZZI: Same objection.  
3 **A I don't. I don't have any recollection**  
4 **of this.**  
5 Q When you communicated with White House  
6 Counsel, if you would have done so by e-mail,  
7 would that have been from your state.gov e-mail  
8 account?  
9 **A Yes.**  
10 Q How about when calling the White House  
11 Counsel's Office during this time frame, December  
12 through March of 2013, December '12 -- 2012  
13 through March of 2013; is there a telephone log or  
14 any other recordkeeping that would have existed  
15 when calls were made from your office to White  
16 House Counsel's office?  
17 MR. BREWSTER: Objection. Form. Outside  
18 the scope.  
19 Q If you know.  
20 **A I don't know. My office did not**  
21 **personally keep a telephone log, if that's what**  
22 **you're asking.**

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1 Q I'm just asking if you're aware of any  
2 telephone logs keeping track of phone calls  
3 between White House Counsel's office and your  
4 office during this time frame.  
5 MR. BREWSTER: Objection. Form.  
6 **A No, there was no call log.**  
7 Q Okay. When you started at the White  
8 House Counsel's office in March of 2013, was the  
9 CREW FOIA request an issue within the office?  
10 MR. BREWSTER: Objection. Form.  
11 Foundation.  
12 Q And the office I'm specifying is White  
13 House Counsel's office.  
14 MR. PEZZI: Same objection.  
15 **A Not to my knowledge, I don't remember**  
16 **anybody raising it with me or speaking about it.**  
17 Q Okay. And then further up the e-mail  
18 chain, still on Exhibit 8, you wrote to  
19 Ms. Walter, Sorry we keep missing each other last  
20 week -- or we kept missing each other last week.  
21 I heard back from WHC. Can we find time to talk  
22 on Monday.

<p style="text-align: right;">117</p> <p>1 What does WHC stand for?</p> <p>2 <b>A I'm assuming, based on the e-mail</b></p> <p>3 <b>traffic, that it stands for White House Counsel's</b></p> <p>4 <b>office.</b></p> <p>5 Q Was it your regular practice to keep any</p> <p>6 notes when you spoke with anybody in the White</p> <p>7 House Counsel's office back in January of 2013?</p> <p>8 <b>A I don't recall keeping any notes, no.</b></p> <p>9 <b>That wasn't my practice.</b></p> <p>10 Q Do you recall the call that you had or a</p> <p>11 conversation that you had with somebody in the</p> <p>12 White House Counsel's office, either on January</p> <p>13 26, 2013, or before up through January 10, 2013?</p> <p>14 MR. BREWSTER: Objection. Form.</p> <p>15 MR. PEZZI: Same objection.</p> <p>16 <b>A I don't. I don't recall any</b></p> <p>17 <b>conversations on this topic.</b></p> <p>18 Q Do you recall any conversations with</p> <p>19 White House Counsel's office at all during this</p> <p>20 time period between January 10, 2013, and January</p> <p>21 26, 2013?</p> <p>22 MR. BREWSTER: Objection. Form.</p>	<p style="text-align: right;">119</p> <p>1 the version we produced about an hour ago.</p> <p>2 MS. COTCA: You know, thank you, Steve.</p> <p>3 Why don't we put this aside. And I'll</p> <p>4 get a copy printed out of what was just produced</p> <p>5 last night, and then we -- I'll ask questions</p> <p>6 based on that one. Okay.</p> <p>7 THE WITNESS: Okay. Sounds good.</p> <p>8 MS. COTCA: And we'll do that after</p> <p>9 lunch.</p> <p>10 THE WITNESS: Okay.</p> <p>11 Q All right.</p> <p>12 MR. BREWSTER: So this is, are we</p> <p>13 striking this as Exhibit 9?</p> <p>14 MS. COTCA: No, I think we'll just</p> <p>15 replace it. We'll put the sticker -- is that</p> <p>16 Exhibit 8?</p> <p>17 MR. BREWSTER: Exhibit 9.</p> <p>18 MS. COTCA: Exhibit 9? Okay. So we'll</p> <p>19 put the -- we'll replace the other one for sticker</p> <p>20 Number 9, for Exhibit 9. Okay.</p> <p>21 (Samuelson Deposition Exhibit 10 marked</p> <p>22 for identification, retained by counsel.)</p>
<p style="text-align: right;">118</p> <p>1 <b>A That's a two-week period from</b></p> <p>2 <b>six-and-a-half years ago. I -- I regularly talk</b></p> <p>3 <b>to White House Counsel's office. I couldn't tell</b></p> <p>4 <b>you if I talked to them in those two weeks.</b></p> <p>5 Q Okay.</p> <p>6 (Samuelson Deposition Exhibit 9 marked</p> <p>7 for identification, retained by counsel.)</p> <p>8 Q Ms. Samuelson, I'm showing you what's</p> <p>9 been marked as Exhibit 9. If you can take a look.</p> <p>10 Let me know once you've had a chance to review it.</p> <p>11 <b>A Do you want me to review the full thing?</b></p> <p>12 <b>It's pretty long.</b></p> <p>13 Q No. Just generally, if you can take a</p> <p>14 quick look through it.</p> <p>15 MR. PEZZI: And I'll just note for the</p> <p>16 record that the State Department about an hour ago</p> <p>17 produced a less redacted version of this document.</p> <p>18 The only difference between the document -- the</p> <p>19 May 6 version, which is what this is, my</p> <p>20 understanding, is the April 4, 2013, e-mail from</p> <p>21 Karen Finnegan, to Sheryl Walter and Jonathan</p> <p>22 Davis, I believe that redaction has been lifted on</p>	<p style="text-align: right;">120</p> <p>1 MR. BREWSTER: So we're making this</p> <p>2 Exhibit 10, then?</p> <p>3 MS. COTCA: Yes.</p> <p>4 BY MS. COTCA:</p> <p>5 Q Ms. Samuelson, if you can take a look at</p> <p>6 what's been marked as Exhibit 10. Again, it's an</p> <p>7 e-mail chain relating to the CREW request. Let me</p> <p>8 know once you've had a chance to review it.</p> <p>9 <b>A Sorry, just trying to look at what was</b></p> <p>10 <b>the new sections.</b></p> <p>11 Q Oh, sure.</p> <p>12 <b>A Okay.</b></p> <p>13 Q And I want to point you to the last</p> <p>14 e-mail, or the first e-mail in the e-mail chain,</p> <p>15 which appears last on this document, on Page 4 of</p> <p>16 the exhibit. Dated March 27, 2013, from State</p> <p>17 Department official Edgar Jaramillo to Patrick</p> <p>18 Scholl and Terry Gordon.</p> <p>19 MR. BREWSTER: Yeah, so where are you?</p> <p>20 MS. COTCA: What is at the bottom of the</p> <p>21 document Exhibit 10?</p> <p>22 MR. BREWSTER: It says Joshua, Jonathon.</p>

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1 MS. COTCA: No. That's the wrong one.  
2 Let me see that e-mail.  
3 This is 899. Okay.  
4 Can we go off the record for a minute.  
5 VIDEO SPECIALIST: We are going off  
6 record at 12:46.  
7 (A recess was taken.)  
8 VIDEO SPECIALIST: We are back on the  
9 record at 12:47.  
10 BY MS. COTCA:  
11 Q Ms. Samuelson, have you had a chance to  
12 look at what's been marked as Exhibit 10?  
13 **A I have.**  
14 Q Okay. And this is a four-page e-mail  
15 chain, again about the CREW FOIA request between  
16 State Department officials, spanning from December  
17 20, 2012, through April 19, 2013.  
18 Is that a fair representation?  
19 **A From December 20, 2012, to April 19.**  
20 Q Nineteen, 2013, yes.  
21 **A Yes.**  
22 Q Thank you.

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1 And during this time frame in April of  
2 2013, you were in the White House Counsel's  
3 office?  
4 **A I was.**  
5 Q Okay. Did you have any interaction with  
6 any of the individuals on this e-mail chain,  
7 whether with Brock Johnson or Ms. Walter or  
8 Jonathan Davis, in regards to the CREW FOIA  
9 request?  
10 MR. BREWSTER: Objection. Form.  
11 **A No, I don't recall any interactions with**  
12 **them.**  
13 Q Okay. After you --  
14 **A On this request.**  
15 Q Sorry. I want to make sure you complete  
16 the answer.  
17 After you left the State Department and  
18 moved over to White House Counsel's office, did  
19 you keep in touch with Brock Johnson in regards to  
20 CREW's FOIA request?  
21 **A I don't recall doing so, no.**  
22 Q Did you at all during the time frame keep

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1 in touch with Brock Johnson on any other matter?  
2 **A I'm trying to remember because it was so**  
3 **long ago. And he is somebody that I communicated**  
4 **with more recently. But I don't -- I can't tell**  
5 **you if I did during that period.**  
6 Q Okay. When did you last communicate with  
7 Mr. Johnson?  
8 MR. BREWSTER: Objection. Outside the  
9 scope.  
10 MR. PEZZI: Same objection.  
11 **A Probably a year ago or so.**  
12 Q Was it in regards at all to any of the  
13 subject matter that we're discussing here today?  
14 **A No. It was personal in nature.**  
15 Q And I just want to point you to the  
16 second e-mail from the top on the first page, from  
17 Mr. Johnson to Jonathan Davis and Ms. Walter, and  
18 then cc'ing Karen Finnegan, Joshua Dorosin and  
19 Gene Smilansky on April 19, 2013.  
20 Do you see here where he says, "Do we  
21 have a draft response I could review or a copy of  
22 the DHS letter yet?"

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1 Did you at any point see or review any  
2 letter from DHS in response to a similar request  
3 from CREW?  
4 **A No. I don't recall seeing a DHS letter.**  
5 Q Okay. Do you recall reviewing CREW's  
6 request to DHS?  
7 **A No.**  
8 Q Do you recall ever reviewing -- do you  
9 recall reviewing the CREW request to the State  
10 Department?  
11 **A So I've obviously seen that more**  
12 **recently, now that it's been in the press. I**  
13 **don't recall whether I saw the actual request back**  
14 **in 2012 or 2013 when these e-mails were sent.**  
15 Q Okay. I believe you left the State  
16 Department on March 8 or around that time frame?  
17 **A That sounds around right.**  
18 Q 2013.  
19 By the time you -- when you left the  
20 State Department, did you have an understanding as  
21 to how the State Department was going to respond  
22 to CREW's request?



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1 **A No, I don't -- no.**  
2 Q Did Ms. Walter communicate with you in  
3 any conversation -- during any conversations as to  
4 whether the State Department would respond to CREW  
5 that it had -- that it has no responsive records?  
6 **A I don't recall that, no.**  
7 MS. COTCA: One more.  
8 (Samuelson Deposition Exhibit 11 marked  
9 for identification, retained by counsel.)  
10 Q Ms. Walter, you've been shown what's been  
11 marked as Exhibit 11.  
12 MR. BREWSTER: I think you mean --  
13 Q I'm sorry, Ms. Samuelson.  
14 And what's marked -- you've been shown  
15 what's marked as Exhibit 11. And again, this is  
16 an e-mail chain amongst State Department officials  
17 in August of 2013 about FOIA requests submitted to  
18 the State Department, including the CREW request.  
19 **A Yes. Sorry.**  
20 Q Sure. Let me know once you've had a  
21 chance to look at it.  
22 **A Yeah, just a lot of pages you've given**

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1 **me.**  
2 Q It's five pages, I believe.  
3 **A Okay, I've reviewed it.**  
4 Q Okay. Thank you.  
5 Did anybody from the State Department  
6 contact you in regards to the CREW request or keep  
7 you up to date with respect to the CREW request  
8 during this time frame in August of 2013?  
9 **A No.**  
10 Q Do you know if anybody from the State  
11 Department communicated with anybody in White  
12 House Counsel's office, other than you, about the  
13 CREW request or any of the other FOIA requests in  
14 this e-mail?  
15 MR. BREWSTER: Objection. Foundation.  
16 MR. PEZZI: Same objection. And  
17 objection, form.  
18 **A They didn't communicate with me about**  
19 **this while I was in White House Counsel's office.**  
20 **Or at least I don't recall any communications**  
21 **about it.**  
22 Q Right. Do you know if there was any

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1 communications with anybody else in White House  
2 Counsel's office?  
3 **A Not that I know of.**  
4 Q Okay.  
5 MS. COTCA: Okay. I think we can go off  
6 the record.  
7 THE WITNESS: Okay.  
8 VIDEO SPECIALIST: We are going off the  
9 record at 12:55.  
10 (A recess was taken.)  
11 VIDEO SPECIALIST: We are back on the  
12 record at 13:52.  
13 BY MS. COTCA:  
14 Q Ms. Samuelson, before you is the  
15 corrected copy with the new unredacted information  
16 in Exhibit 9. And we'll go to that in just a  
17 minute.  
18 **A Okay.**  
19 Q Beforehand, can I have you look at  
20 Exhibit 6 for just a minute?  
21 **A Okay. I've got it.**  
22 Q Which is the e-mail chain that begins

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1 with an e-mail from Jonathan Davis to you, on  
2 March 5th, 2013.  
3 Are we looking at the same one?  
4 **A We are.**  
5 Q Okay. Great. That first e-mail,  
6 Mr. Jonathan Davis wrote to you asking -- well,  
7 about the CREW request, thanking you for following  
8 up and saying, "I understand the next steps is for  
9 IPS to," and the remaining of the information is  
10 redacted.  
11 (A discussion was held off the record.)  
12 BY MS. COTCA:  
13 Q Did you have an opportunity to review  
14 this e-mail in unredacted form for your deposition  
15 today?  
16 MR. BREWSTER: Objection. Calls for  
17 privileged. I'm going to direct her not to  
18 answer.  
19 MS. COTCA: I'm just asking if she  
20 reviewed it in unredacted. I'm not asking about  
21 the content of the information in the e-mail.  
22 MR. BREWSTER: You're asking if -- you're

<p style="text-align: right;">129</p> <p>1 asking if she saw an unredacted version of this 2 e-mail? 3 MS. COTCA: Yes. 4 MR. BREWSTER: When? 5 MS. COTCA: In preparation for her 6 deposition today. 7 MR. BREWSTER: I'm going to ask her -- 8 I'm going to instruct her not to answer that 9 question. 10 MS. COTCA: Okay. 11 BY MS. COTCA: 12 Q Sitting here today, do you recall what 13 the next steps for IPS were that Mr. Davis 14 referred to in Exhibit 6? 15 MR. PEZZI: Objection. Calls for 16 information subject to the attorney-client 17 privilege and the attorney work product doctrine. 18 I instruct the witness not to answer except to the 19 extent she can answer with a yes or no as to 20 whether or not she recalls. 21 MS. COTCA: Well, the question was just 22 if she recalls. There was nothing about the</p>	<p style="text-align: right;">131</p> <p>1 During this time, who from the White 2 House -- well, let me direct you to the last 3 e-mails in this e-mail chain on page -- fourth 4 page. It's back in -- front and back sided here. 5 From Patrick Scholl to Sheryl Walter, dated March 6 28, 2013, where Mr. Scholl wrote to Ms. Walter, "I 7 believe that the White House was tracking these 8 cases." 9 Do you see that? 10 <b>A I do.</b> 11 Q Okay. And then, actually, that's in 12 response to an earlier e-mail to Mr. Scholl from 13 Edgar Jaramillo, who we understand -- well, it 14 says right here he's within IPS office. His 15 e-mail dated March 27, 2013, where he's informing 16 State Department officials that he tasked S/ES-CR 17 and IRM with the attached request regarding 18 S/Clinton's private e-mails. 19 Do you see that? 20 <b>A Yes.</b> 21 Q And then which the White House has 22 also -- also had an interest in knowing about from</p>
<p style="text-align: right;">130</p> <p>1 substance in the e-mail. 2 MR. PEZZI: And if she limits her answer 3 to whether or not she recalls, she may answer. 4 <b>A I do not recall.</b> 5 Q Thank you. 6 Okay. You can put that aside. We can 7 look at Exhibit 9 now. 8 Have you had a chance to review it? 9 <b>A I did. I looked through it.</b> 10 Q Okay. 11 <b>A Before we were on the record.</b> 12 Q Okay. And just so the record is clear, 13 this is an e-mail chain between State Department 14 officials spanning from March 27, 2013, through 15 May 1, 2013, about the CREW request. And in the 16 subject line it says "WH and S/Clinton's e-mail." 17 Is that an accurate representation? 18 <b>A I believe all these individuals are State 19 Department officials, but I don't know that.</b> 20 Q Okay. Well, we -- I'll represent to you 21 that we received this document from the State 22 Department in the discovery in this case, so ...</p>	<p style="text-align: right;">132</p> <p>1 us at FOIA. 2 Do you know who from the White House had 3 an interest in knowing about this at FOIA in March 4 of 2013? 5 <b>A I don't.</b> 6 MR. BREWSTER: Objection. Form. 7 Foundation. 8 MR. PEZZI: Same objection. 9 <b>A I do not.</b> 10 Q Okay. Do you know who Mr. Scholl was 11 referring to in his March 28, 2013, e-mail above, 12 when he said the White House was tracking these 13 cases? Who from the White House he was referring 14 to? 15 MR. BREWSTER: Same objection. 16 <b>A I do not. Nor do I know who Mr. Scholl 17 is.</b> 18 Q Okay. During your time at White House 19 Counsel's office from March of 2013 through, I 20 believe you said May of 2014? 21 <b>A April.</b> 22 Q April. Sorry. Thank you.</p>

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1 April of 2014. Were you aware of the  
2 White House tracking or following any FOIA  
3 requests from any of the other agencies?  
4 MR. BREWSTER: Object.  
5 Q Including the State Department?  
6 MR. BREWSTER: Objection. Form. Outside  
7 the scope.  
8 MR. PEZZI: Same objection.  
9 **A Not, not to -- not that I can think of**  
10 **here today.**  
11 Q And I want to point you back to Exhibit  
12 8.  
13 **A Got it. Sorry. They were out of order.**  
14 Q No problem.  
15 And again looking at Ms. Walter's e-mail  
16 to you on January 10, 2013, where she's informing  
17 you that the State Department is going to be  
18 interpreting the CREW FOIA request for official  
19 e-mail accounts rather than personal e-mail  
20 accounts.  
21 Did you at that point, or at any point  
22 during all of this e-mail traffic about the CREW

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1 request, raise to Ms. Walter, or anybody else who  
2 you may have discussed with at the State  
3 Department about the CREW request, the e-mail  
4 address that you were aware of that Secretary  
5 Clinton used for State Department business?  
6 MR. BREWSTER: Objection. Form.  
7 Foundation.  
8 MR. PEZZI: Same objections.  
9 **A I didn't know the extent she was using it**  
10 **for State Department business at the time. I -- I**  
11 **may have raised it, but I don't recall.**  
12 Q Did you recall -- I mean, excuse me. Did  
13 you raise the e-mail account that Secretary  
14 Clinton used for State Department business, which  
15 you were aware of -- and again during the time  
16 span of all this e-mail traffic about the CREW  
17 request -- during any conversations that you had  
18 with Ms. -- with Ms. Cheryl Mills about the CREW  
19 request?  
20 MR. BREWSTER: Objection. Form.  
21 Foundation.  
22 MR. PEZZI: Same objections.

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1 **A I think as we discussed earlier, I don't**  
2 **remember speaking with Cheryl with this request.**  
3 Q Well, then, focusing then on your  
4 discussions with Ms. Walter. Wouldn't that have  
5 been a logical piece of information for you to  
6 raise to Ms. Walter when discussing the CREW --  
7 CREW's FOIA request, and how the State Department  
8 was going to respond to CREW?  
9 MR. BREWSTER: Objection. Form.  
10 MR. PEZZI: Same objection.  
11 **A I don't know the extent to which I knew**  
12 **about the -- the details of the FOIA request. I**  
13 **don't know the extent. Nor do I recall the extent**  
14 **of my conversations with Ms. Walter.**  
15 Q Okay. But you read -- was it your  
16 practice to read the e-mails that you received?  
17 **A Yes.**  
18 Q Okay. So we're looking at --  
19 **A I hope so.**  
20 Q Okay. Good. I mean, especially since  
21 you responded to --  
22 **A Yes.**

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1 Q -- Ms. Walter's e-mail. So --  
2 **A So I would hope I read it.**  
3 Q Okay. So we're speaking to about the  
4 e-mail from January 10, 2013, and this e-mail  
5 chain. And my question is, wouldn't it at that  
6 point, when Ms. Walter informed you in writing  
7 that the State Department was going to interpret  
8 CREW's FOIA request to ask for official accounts  
9 rather than personal e-mail accounts, wouldn't it  
10 have been a logical piece of information for you  
11 to inform Ms. Walter with respect to the e-mail  
12 account that you were aware of that Secretary  
13 Clinton was using for state business?  
14 MR. BREWSTER: Objection. Form.  
15 Foundation.  
16 MR. PEZZI: Objection. Form.  
17 **A So I don't recall what conversations we**  
18 **had prior to this e-mail chain. I don't recall**  
19 **what was the impetus for her sending this to me.**  
20 **So I can't tell you today whether it**  
21 **would have been logical or not. And I can't tell**  
22 **you today, you know, whether I raised it with her**

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1 **or not. I just don't recall.**  
2 Q If you -- if you recall, I mean, we've  
3 looked through all these e-mail chains that speak  
4 about or talk -- refer to the CREW request.  
5 Was Ms. Walter your main point of  
6 contact, who you dealt with, with respect to what  
7 the status of the request was from the State  
8 Department?  
9 MR. BREWSTER: Objection. Foundation.  
10 **A This just wasn't a big part of my job**  
11 **responsibilities. I don't recall having these**  
12 **conversations.**  
13 Q And you don't recall who --  
14 **A Yeah.**  
15 Q -- your point of contact was, if you  
16 wanted to know the status?  
17 **A I mean, it -- I -- I don't.**  
18 Q Okay. The fact that this wasn't -- what  
19 did you say, that this wasn't part of your job  
20 responsibilities?  
21 **A I did not say that. I said it wasn't a**  
22 **big part of my job responsibilities.**

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1 Q Thank you.  
2 The fact that it wasn't a big part of  
3 your job responsibilities, and there was all this  
4 e-mail traffic about this FOIA request, wouldn't  
5 that have been more memorable for you to recall  
6 during this time frame, when you were at the State  
7 Department?  
8 MR. BREWSTER: Objection. Form.  
9 MR. PEZZI: Same objection.  
10 **A Again, I got hundreds of e-mails when I**  
11 **was at the State Department. And during this time**  
12 **is when I was very much focused on Secretary**  
13 **Kerry's transition to the department.**  
14 Q In 2013 were you aware that the State  
15 Department responded to CREW that it had no  
16 records responsive to its request?  
17 **A No.**  
18 MR. BREWSTER: Objection. Foundation.  
19 **A I did not become aware of it until it was**  
20 **in the press.**  
21 Q Okay.  
22 **A A couple of years later, I think.**

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1 Q Okay. Are you aware that the State  
2 Department's OIG office, in part of its  
3 investigations as to how the State Department  
4 responded to FOIA requests during Secretary  
5 Clinton's tenure, looked at this particular FOIA  
6 request? Are you aware of that?  
7 **A I -- I recall either reading it in the**  
8 **report or reading it later on in the press.**  
9 Q Does it surprise you to learn that the  
10 state OIG found that State Department staff  
11 advised the OIG of their belief that the State  
12 Department's response to CREW was incorrect, and  
13 that it should have been revised to include the  
14 former Secretary's personal e-mail account to  
15 conduct official government business?  
16 MR. BREWSTER: Objection. Form.  
17 Foundation.  
18 MR. PEZZI: Same objections.  
19 **A I -- I don't know, because I don't have**  
20 **the specific request in front of me. I don't know**  
21 **what went into State Department's decision to --**  
22 **to release the response they did.**

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1 Q Okay. Well, I'll represent to you that  
2 the State Department responded to CREW on May 10,  
3 I believe, of 2013, that it had no records  
4 responsive to its request. And that is the  
5 request we're speaking here about today.  
6 So based on that representation that I  
7 made to you, are you surprised to learn that State  
8 Department officials informed OIG during its  
9 investigation of their belief that the  
10 department's response to CREW was incorrect, and  
11 that it should have been revised to include the  
12 former Secretary's personal e-mail account used to  
13 conduct official government business?  
14 MR. BREWSTER: Objection. Form.  
15 Foundation.  
16 MR. PEZZI: Same objections.  
17 **A Am I surprised, sitting here today?**  
18 Q Yes.  
19 **A I'm not sure I understand what you're**  
20 **asking. I'm sorry.**  
21 Q Are you surprised to learn that State  
22 Department officials informed OIG that State

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1 Department's response to CREW was incorrect?  
2 MR. BREWSTER: Same objections.  
3 MR. PEZZI: Same objections.  
4 **A Again, I do not understand. I'm sorry, I**  
5 **don't understand your question. I'm surprised?**  
6 Q I'm sorry. What part of the question  
7 don't you understand?  
8 **A What do you mean by am I surprised? I**  
9 **don't know who the State Department officials were**  
10 **that you were referring to. I have read that.**  
11 **If -- if the OIG found that this response was**  
12 **incorrect, I have no reason to doubt that.**  
13 Q Are you surprised to learn that State  
14 Department officials -- not the OIG, but State  
15 Department officials -- believed that State  
16 Department's response to CREW was incorrect and  
17 that it should have been revised to include  
18 Secretary Clinton's e-mail?  
19 MR. BREWSTER: Objection. Form.  
20 Foundation.  
21 MR. PEZZI: Same objections.  
22 **A I'm not surprised or unsurprised. I ...**

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1 Q Okay. I want -- so I want to move to the  
2 time when you were departing the State Department.  
3 **A Okay.**  
4 Q Was there a procedure in place, when you  
5 were leaving the State Department, with respect to  
6 reviewing any personal material that you were to  
7 take with you from the State Department?  
8 MR. BREWSTER: Objection. Outside the  
9 scope.  
10 **A I'm trying to remember. I did not take**  
11 **any material with me outside the State Department.**  
12 **I left everything for my successor.**  
13 Q Okay. Were you at all involved in the  
14 process in sorting Secretary Clinton's papers and  
15 what she took and what she left at the State  
16 Department prior to her departure?  
17 MR. BREWSTER: Objection. Foundation.  
18 **A Not prior to her departure, no.**  
19 Q Well, at the time of her departure from  
20 the State Department?  
21 **A Not at the time of her departure, either.**  
22 Q Were you at any point involved in that

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1 process?  
2 **A I -- so I was her personal counsel later,**  
3 **though I'm sure we're getting to that.**  
4 Q Okay. I'm speaking about January to  
5 February 1st of 2013. Okay.  
6 So the answer is you were not involved.  
7 **A Correct.**  
8 Q Okay. Thank you.  
9 Did you ever e-mail Cheryl Mills to her  
10 personal e-mail account for State Department  
11 business?  
12 MR. BREWSTER: Objection. Foundation.  
13 It's outside the scope.  
14 MR. PEZZI: Same objections.  
15 **A I may have. I just don't recall.**  
16 Q How about Jacob Sullivan?  
17 MR. BREWSTER: Same.  
18 Q Did you ever e-mail him for State  
19 Department business to his personal e-mail  
20 account?  
21 MR. BREWSTER: Same objections.  
22 MR. PEZZI: Same objections.

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1 **A Again, I may have. I just don't recall.**  
2 Q And then the same question for Huma  
3 Abedin, if you ever e-mailed her to her  
4 Clintonemail.com e-mail account or any other  
5 personal e-mail account for State Department  
6 business?  
7 **A I may have.**  
8 Q Okay.  
9 Okay. So I want to now move into the  
10 summer of 2014, when you began working for  
11 Secretary Clinton as her attorney. And just so  
12 the record is clear, I'm only asking you about the  
13 work you did for Secretary Clinton in relation to  
14 collecting and reviewing her e-mails for purposes  
15 of returning to the State Department. Okay?  
16 **A Okay.**  
17 Q Okay. When did you become first aware  
18 about a review for Secretary Clinton's e-mails for  
19 purposes of returning them to the State  
20 Department?  
21 **A What do you mean by "a review"?**  
22 Q Well, when -- when were you first made

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1 aware that, either by Cheryl Mills or by Secretary  
2 Clinton, about retaining you to assist in the  
3 process to collect Secretary Clinton's e-mails and  
4 any review that may be entailed in that process  
5 for purposes of returning them to the State  
6 Department?  
7 **A So I believe it was --**  
8 MR. BREWSTER: One second.  
9 You can answer to the extent that you're  
10 not divulging any attorney-client privileged  
11 communications.  
12 Q I'm just asking for the time frame, the  
13 date.  
14 MR. BREWSTER: Okay.  
15 **A I believe it was late summer 2014.**  
16 Q Okay. And I believe your testimony was  
17 that Ms. Mills hired you as -- to come on board to  
18 represent Secretary Clinton?  
19 **A That's correct.**  
20 Q Okay. Can you narrow it down other than  
21 the summer of 2014, as by month?  
22 **A August, I would say. That's my best**

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**1 guess.**  
2 Q Okay.  
3 (Samuelson Deposition Exhibit 12 marked  
4 for identification, retained by counsel.)  
5 Q Ms. Samuelson, please look at what's been  
6 marked as Exhibit 12. And let me know once you've  
7 had a chance to review it.  
8 Have you had a chance to review it?  
9 **A I have. Thank you.**  
10 Q Are you familiar with this document?  
11 **A I am not.**  
12 Q Okay. So just so the record is clear, it  
13 is an e-mail chain between State Department  
14 officials, but which begins with an e-mail from  
15 Cheryl Mills to David Wade, and a copy to Richard  
16 Visek and Philip Reines, subject Following Up,  
17 dated August 22, 2014.  
18 Is that a fair representation?  
19 **A Yes.**  
20 Q Okay. Thank you. And I want to point  
21 you to that first e-mail in that e-mail chain,  
22 from Cheryl Mills to David Wade.

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1 Who's David Wade?  
2 **A My recollection is he was serving as**  
3 **Secretary Kerry's Chief of Staff at the State**  
4 **Department at the time.**  
5 Q Okay. And do you know Richard Visek?  
6 **A Yes. He's in the legal advisor's office.**  
7 **I believe he was deputy counsel at the time, but I**  
8 **don't know for certain.**  
9 Q And what about Philip Reines?  
10 **A He was an advisor to the Secretary.**  
11 Q Okay. And in this e-mail, Ms. Mills  
12 wrote to Mr. Wade and to Mr. Visek, "I wanted to  
13 follow up on your request last month about getting  
14 hard copies of Secretary Clinton's e-mails to/from  
15 accounts ending in, '.gov,' for the tenure at the  
16 department."  
17 Do you see that?  
18 **A I do.**  
19 Q Okay. So based on this e-mail, I read it  
20 to mean that Ms. Mills was in touch with Mr. Wade  
21 in July of 2014.  
22 Is that fair --

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1 MR. BREWSTER: Objection.  
2 Q -- interpretation?  
3 MR. BREWSTER: Objection. Foundation.  
4 **A I can't testify that it was in July.**  
5 Q I'm just asking is that a fair read by  
6 me? I'm reading it as meaning July, if she's  
7 referring to it as last month.  
8 **A It's an interpretation.**  
9 Q Okay. July comes before August, doesn't  
10 it?  
11 **A It does.**  
12 Q Okay.  
13 MR. BREWSTER: Objection.  
14 Q Were you in -- at the time that Ms. Mills  
15 first reached out to Mr. Wade about returning hard  
16 copies of Secretary Clinton's e-mails to or from  
17 accounts ending in .gov during her tenure, were  
18 you at that point retained to assist in that  
19 process?  
20 **A I don't know the answer to that. I don't**  
21 **know exactly when I was asked to help in this**  
22 **process.**

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1 Q Okay. Do you know why Ms. Mills copied  
2 Philip Reines onto this e-mail dated August 22nd,  
3 2014?  
4 MR. BREWSTER: Objection. Form.  
5 Foundation.  
6 **A I don't.**  
7 Q Okay. Did Mr. Reines have any role in --  
8 with respect to the State Department's request for  
9 Secretary Clinton to return her e-mails to the  
10 State Department?  
11 MR. BREWSTER: Objection. Foundation.  
12 **A Did he have any role?**  
13 Q Uh-huh. Was he involved in any way?  
14 **A Sorry, I'm just trying to think back. It**  
15 **was -- it was a while ago.**  
16 **He may have been somebody that when we**  
17 **were determining whether items were work or**  
18 **personal, which I assume we'll get to later, that**  
19 **we consulted. But I don't -- I'm not sure.**  
20 Q Okay.  
21 Okay. And is that the only involvement  
22 that you recall with respect to Mr. Reines during

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1 this process?  
2 **A He was -- he handled communications and**  
3 **press for the Secretary, so he may have been**  
4 **involved later on with communications and press**  
5 **around it. But that's -- that's my only**  
6 **recollection.**  
7 Q Okay. And when you're speaking about  
8 communications and press, are you referring to  
9 after the March 2015 reports --  
10 **A Correct.**  
11 Q -- that came out?  
12 **A Correct.**  
13 Q Okay. So I want to -- I want to focus  
14 just on this time frame of summer of 2014.  
15 So during this time period of summer 2014  
16 through the end of 2014, is that the only aspect  
17 in which Mr. Reines was involved, going back to  
18 your testimony with respect to seeking his counsel  
19 or advice in determining personal versus business  
20 record?  
21 **A That's my recollection.**  
22 Q Okay. And how did -- well, I'll withdraw

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1 that.  
2 And what was the process -- after you  
3 were retained to assist in this process, what did  
4 you do as a result of collecting Secretary  
5 Clinton's e-mails?  
6 MR. BREWSTER: To the extent you can  
7 answer without divulging attorney work -- work  
8 product or attorney-client privilege.  
9 **A So my recollection is, the first step i,**  
10 **we asked Platte River for the universe of e-mails**  
11 **from January 2009 until February 2013, which was**  
12 **the time that she served at the State Department.**  
13 **My recollection is that we first asked**  
14 **for those that are to and from a .gov account, as**  
15 **is -- seems to be referenced here.**  
16 Q And when? When was that time frame, if  
17 you recall?  
18 **A I believe it was in August of 2014.**  
19 Q Okay. And when you said "we made a  
20 request," who's "we"?  
21 **A It was --**  
22 Q Who were you referring to? Sorry.

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1 **A It was myself and Cheryl Mills. It was**  
2 **one of us.**  
3 Q Okay. And did Platte River Networks, is  
4 that who you said you contacted?  
5 **A That's correct.**  
6 Q Okay. And I believe I've seen the  
7 acronym PRN for them. If I refer to it as PRN,  
8 can we agree --  
9 **A Yes.**  
10 Q -- that we're speaking about the same  
11 thing?  
12 **A Yes.**  
13 Q Okay. Thank you.  
14 And did PRN provide a set of Secretary  
15 Clinton's e-mails to you as a -- in response to  
16 your request?  
17 **A They did.**  
18 Q Okay. Now, I've seen that referenced in  
19 some of the FBI's interview notes of certain  
20 individuals as them referring to it as the July  
21 export.  
22 Are you familiar with that term or have

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1 you seen that term used to describe the process  
2 that they undertook in response to your initial  
3 request?  
4 MR. BREWSTER: Objection. Form.  
5 Foundation.  
6 **A I don't believe I have. I may have. I**  
7 **just -- I don't recall.**  
8 Q Okay. Okay. And what did you do once  
9 they provided a set of the e-mails from  
10 Secretary -- from or to Secretary Clinton from  
11 January 2009 to February of 2013 with .gov e-mail  
12 accounts?  
13 **A So when we received those, we reviewed**  
14 **those for what was work related and what was**  
15 **personal.**  
16 **There was a decision to be overinclusive**  
17 **in terms of what was work related. And,**  
18 **therefore, almost all of those .gov e-mails,**  
19 **frankly, potentially all -- I want to be careful.**  
20 **I think almost all went -- were provided to the**  
21 **State Department as work related, even though some**  
22 **were arguably not.**

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1 Q Okay. Let me back up a little bit.  
2 How many e-mails did you receive from  
3 Platte River Networks in response to your request  
4 for Secretary Clinton's e-mails either to or from  
5 .gov accounts?  
6 **A I don't recall. I know that they made up**  
7 **a large portion of the work-related e-mails that**  
8 **were provided to the department. I think**  
9 **somewhere around 90 percent, but I don't -- I**  
10 **don't recall the exact number.**  
11 Q How do you know that it was somewhere  
12 around 90 percent?  
13 **A Because in preparation for this I**  
14 **reviewed the material that used to be on the**  
15 **campaign's website. And I -- I recalled that it**  
16 **said it was around 90 percent. I have no reason**  
17 **to doubt that.**  
18 Q Okay. You didn't actually go and try to  
19 figure out the percentage and the math to figure  
20 out if it was about 90 percent?  
21 **A Today? No.**  
22 Q Yes. Thank you.

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1 So after receiving the e-mails from --  
2 either from or to Secretary Clinton with .gov, did  
3 you make any other requests to PRN for any other  
4 e-mails to be provided as part of your review?  
5 **A I did.**  
6 Q Okay. And can you tell me about those  
7 requests?  
8 **A So I -- I -- it was either myself or**  
9 **Cheryl went to Platte River and asked if we could**  
10 **have the full e-mail box for Secretary Clinton**  
11 **dating January 2009 to February 20 -- to February**  
12 **2013.**  
13 Q So did that request include e-mails with  
14 .gov accounts, as well as any other e-mails?  
15 **A It did.**  
16 Q Okay. And when you said "the full e-mail  
17 box," what do you mean by that?  
18 **A Sorry. I just didn't know how to**  
19 **categorize it.**  
20 **We just asked for any e-mails that Platte**  
21 **River had that could -- that Platte River -- let**  
22 **me back up. That Platte River could pull for us**

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1 **that was from January 2009 to February 2013.**  
2 Q Okay. And were these e-mails that Platte  
3 River pulled from you from Secretary Clinton's,  
4 like, Inbox and Sent folder?  
5 **A Yes. I -- well, I should say I believe**  
6 **so, the way they -- they were sent to me, they**  
7 **were both sent and received.**  
8 Q Okay. What about, did you receive any  
9 e-mails from Draft folder or box from Secretary  
10 Clinton's e-mail account?  
11 MR. BREWSTER: Objection. Form.  
12 If you know.  
13 **A I'm sorry, I'm just trying to think.**  
14 **This was a really long time ago.**  
15 **I -- I don't recall. There might have**  
16 **been, but I don't recall, sitting here today.**  
17 Q Okay. And you testified earlier that you  
18 were interviewed by the FBI in regards to this  
19 process. Correct?  
20 **A Correct.**  
21 Q Okay. Is that information that you would  
22 have disclosed if you would have received e-mails



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1 from Secretary Clinton's draft folder, that you  
2 would have disclosed to the FBI?  
3 MR. BREWSTER: Objection. Form.  
4 If you can answer without divulging  
5 attorney-client privilege, you may answer.  
6 MR. STEKLOFF: Could I just clarify, are  
7 you asking if the FBI asked her about it?  
8 MS. COTCA: I'm just asking if that's the  
9 type of information that she would have disclosed  
10 to the FBI.  
11 MR. STEKLOFF: I'm not sure I understand  
12 that question, but she can answer if she  
13 understands.  
14 Q Let me --  
15 **A I mean, of course. I mean ...**  
16 Q Let me back up.  
17 Did the FBI ask you whether you received  
18 from Platte River e-mails from Secretary Clinton's  
19 Draft folder?  
20 MR. BREWSTER: Objection. Form.  
21 Foundation.  
22 **A They may have. I don't -- I don't**

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1 **recall.**  
2 Q Okay.  
3 **A If they -- and if they did, I would have**  
4 **answered truthfully to the best of my recollection**  
5 **at the time.**  
6 Q Okay. I'm not trying to trick you. I'm  
7 just trying to understand what the information is.  
8 MR. STEKLOFF: That's what I assumed. I  
9 was just trying to clarify because it was a  
10 confusing question.  
11 MS. COTCA: That's fine. Thank you.  
12 MR. BREWSTER: Yeah.  
13 Q Okay. And then when did you make  
14 the second -- when was the second request made to  
15 PRN for the full e-mail box with the e-mails from  
16 the Inbox and the Sent folder?  
17 **A So the .gov also had the Inbox and the**  
18 **Sent folder, just to be clear.**  
19 Q Oh, sure.  
20 **A But the -- when I requested the full --**  
21 **sorry I keep using the word "full." I just don't**  
22 **know how else to describe it. We requested the --**

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1 **all of the e-mails that they had in their**  
2 **possession. That was maybe a month or so later.**  
3 **I just don't recall.**  
4 Q And how many e-mails did you receive from  
5 PRN in response to the second request?  
6 **A My recollection was that it was just over**  
7 **60,000.**  
8 Q That's 60,000 e-mails, just to be clear.  
9 Correct?  
10 **A Correct.**  
11 Q Okay. Because there was also reference  
12 to 55,000 pages, so ...  
13 **A Oh, yeah.**  
14 Q 60,000 e-mails.  
15 **A Correct.**  
16 Q Okay. Thank you. Okay.  
17 Now, I want to focus on the first  
18 request.  
19 **A Sorry.**  
20 Q When -- that's okay.  
21 When the initial request was made for the  
22 .gov e-mails, had you already begun the process of

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1 reviewing those e-mails to determine what may be  
2 relevant in response to the State Department's  
3 request?  
4 MR. BREWSTER: Objection. Form.  
5 Foundation.  
6 Q Let me reask it --  
7 **A Okay.**  
8 Q -- if that's okay.  
9 Prior to making the second request for  
10 all of Secretary Clinton's e-mails from the Inbox  
11 or the Sent folder, at that point had you already  
12 done the review of the .gov e-mails that you  
13 received a month before?  
14 **A I believe so, yes.**  
15 Q Okay. And can you explain how that  
16 review -- what the process was for that review?  
17 **A For the .gov?**  
18 Q Yes.  
19 **A Because most -- the majority, vast**  
20 **majority of them were work related, because that's**  
21 **how she would -- if she was e-mailing about**  
22 **something work related, she would typically e-mail**

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1 on her personal .gov account, so that review was  
2 relatively quicker than the other review that I'm  
3 sure we'll talk about.  
4 **Because it was just looking for things**  
5 **that were purely personal. And then as I kind of**  
6 **mentioned before, we were overinclusive. And so,**  
7 **therefore, a lot of material that was produced to**  
8 **and from a .gov account was arguably personal in**  
9 **nature.**  
10 **I'm just saying we were over -- I'm just**  
11 **saying we were overinclusive. I'm sorry. That**  
12 **was a complicated way to say it. We were -- I was**  
13 **overinclusive in terms of what was produced from**  
14 **the .gov subsection.**  
15 Q Okay. And who did the review of those  
16 e-mails, the .gov section?  
17 A **I did.**  
18 Q Okay. Were -- anybody else do the  
19 initial review of the .gov e-mails?  
20 A **I consulted with Sheryl and David on it.**  
21 Q And who is David?  
22 A **I'm sorry, David Kendall.**

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1 Q And who is David Kendall?  
2 A **He is one of her other personal counsels.**  
3 Q That's okay. We just need to make it  
4 clear for the record.  
5 A **Sorry about that.**  
6 Q That's okay.  
7 So was it that you just consulted with  
8 either Ms. Mills or Mr. Kendall when you had  
9 particular questions, or were they -- did you  
10 consult with them on a regular basis, like, This  
11 is what I reviewed today?  
12 MR. BREWSTER: Objection, to the extent  
13 you can answer without divulging attorney work  
14 product or attorney-client privilege.  
15 A **I don't recall it being day-to-day basis.**  
16 **I did consult with them. I couldn't tell you how**  
17 **often.**  
18 Q Okay.  
19 Okay. And now I want to get to the  
20 review of the other e-mails. The .gov, but also  
21 the batch that included .mil and other e-mails  
22 that were either sent to or from Secretary

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1 Clinton.  
2 Can you explain -- well, for the record,  
3 you nodded your head when I said .mil.  
4 Do you know what that refers to, the  
5 .mil?  
6 A **I do.**  
7 Q Okay. Can you explain that?  
8 A **It's e-mail addresses with the Department**  
9 **of Defense.**  
10 Q Okay. And the .mil stands for military?  
11 A **I assume so.**  
12 Q Okay. Can you explain how that process  
13 of the review took place?  
14 A **Yes. So first -- so as I said, we had**  
15 **asked Platte River to provide us with all e-mails**  
16 **from January 2009 to March 2013.**  
17 **We had already reviewed those that went**  
18 **to and from a .gov. So this part of the review**  
19 **was very -- was looking for any e-mails that she**  
20 **may have that are work related that would be with**  
21 **individuals who did not have a .gov address, or**  
22 **were not -- or may not have used a .gov address**

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1 **for the particular correspondence.**  
2 **So that could have included members of**  
3 **Congress, it could have included other department**  
4 **officials, it could have included advisory board**  
5 **members. Anyone she may have corresponded with on**  
6 **work-related matters.**  
7 **So the first thing that I did -- again,**  
8 **this was a long time ago, so it's really just the**  
9 **best of my recollection today -- is we sorted her**  
10 **Inbox by to and from, to see who she was**  
11 **corresponding with. And I would review the names.**  
12 **And if it was somebody that she would be**  
13 **corresponding with on work-related matters, I**  
14 **would -- and it appeared to be work related, I**  
15 **would put it in the -- I'll call it the**  
16 **work-related pile.**  
17 **If I didn't recognize a name, I would**  
18 **look it up.**  
19 Q Okay. And then?  
20 A **The next piece that I did was to make**  
21 **sure that I had caught everything. I did some**  
22 **keyword searches, which included the names of**

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1 department officials, assistant Secretaries, Under  
 2 Secretaries that she may have corresponded with.  
 3 And then I also did other keyword  
 4 searches, such as -- which I know is relevant to  
 5 this case -- Libya and Benghazi.  
 6 Q Okay. And then?  
 7 A And for any -- and then for -- once I had  
 8 the batch that were work related, I printed those  
 9 pages.  
 10 Q Okay.  
 11 MR. BREWSTER: Ramona, would it be okay  
 12 to take a break? I know we've only been going for  
 13 45 minutes. But I want to have a quick  
 14 conversation with my client.  
 15 MS. COTCA: About privilege issues?  
 16 MR. BREWSTER: Yes.  
 17 MS. COTCA: Sure.  
 18 MR. BREWSTER: Okay. Thank you.  
 19 THE WITNESS: Thank you.  
 20 VIDEO SPECIALIST: We are going off the  
 21 record at 14:37.  
 22 (A recess was taken.)

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1 VIDEO SPECIALIST: We are back on the  
 2 record at 14:44.  
 3 THE WITNESS: Sorry. So I realize I was  
 4 a bit inarticulate before when you asked me about  
 5 the .gov subsection. And I believe I  
 6 inadvertently said that the majority of the .gov  
 7 were personal in nature. That is obviously  
 8 incorrect. The majority of e-mails she sent to  
 9 and from a .gov e-mail address were work related.  
 10 MS. COTCA: Okay. Thank you for the  
 11 clarification.  
 12 BY MS. COTCA:  
 13 Q I want to just back up a little bit to  
 14 your testimony about the 90 percent figure that  
 15 you had mentioned.  
 16 Who came up with that 90 percent figure?  
 17 MR. BREWSTER: Objection. To the extent  
 18 you can divulge -- without divulging  
 19 attorney-client privilege.  
 20 A It was just math. So we took the number  
 21 of total e-mails that were provided to the  
 22 department -- well, I guess it's the opposite. We

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1 divided the number of e-mails that were sent to  
 2 and from a .gov account, or had a .gov cc'd, by  
 3 the total number of e-mails that were provided to  
 4 the department.  
 5 Q And who did that? Who is "we"?  
 6 MR. BREWSTER: Same objection.  
 7 A I don't recall. It could have been me.  
 8 Q And when you did the initial review with  
 9 just the .gov e-mails, you stated that you did a  
 10 review and it went fairly quickly, since most of  
 11 them were work related.  
 12 But were there any during that review  
 13 that you deemed were personal in nature?  
 14 A There may have been a couple that were  
 15 deemed personal in nature, but I don't recall.  
 16 Q Okay. And were those removed from the  
 17 batch that was provided to the State Department?  
 18 A If there were, yes.  
 19 Q Okay. And do you recall with whom those  
 20 e-mails were, between Secretary Clinton and who?  
 21 MR. BREWSTER: Objection. To the extent  
 22 you can answer without divulging attorney work

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1 client privilege -- product, not client.  
 2 A I don't recall, sitting here today.  
 3 Q And what was the process or what was the  
 4 methodology that you used to determine what was  
 5 work related and what was personal in nature with  
 6 respect to the initial review of the .gov e-mails?  
 7 A Like I said, the vast, vast majority were  
 8 official. And even if they were something as  
 9 simple as her sitting in a meeting and asking for  
 10 iced tea, we treated that as official. And that  
 11 was provided to the department.  
 12 There was -- so the vast majority of  
 13 those were -- were work related.  
 14 Q Okay. But my question was, what was the  
 15 methodology that you used when you were reviewing  
 16 the .gov e-mails with respect to determining  
 17 whether the e-mail was personal in nature or if it  
 18 was related to state business?  
 19 MR. BREWSTER: To the extent -- to the  
 20 extent you can answer without divulging attorney  
 21 work product privilege.  
 22 A I read them.

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1 Q Did you read every single e-mail?  
 2 A **I can't --**  
 3 Q From the initial review with just the  
 4 state.gov e-mails?  
 5 A **I can't say that I read every word of**  
 6 **every e-mail.**  
 7 **But if it was -- if it was mix of**  
 8 **personal and work, it was provided as work**  
 9 **related. If that's your question.**  
 10 Q Well, that goes to -- that answers part  
 11 of my question, with respect to mixed documents.  
 12 Your testimony, as I understand it, is if  
 13 it had both personal use and state business use,  
 14 when you reviewed the state dot -- not the state,  
 15 excuse me, but the .gov e-mails, you determined  
 16 those e-mails to be work related.  
 17 A **Correct.**  
 18 MR. BREWSTER: Objection. Form.  
 19 Q Okay.  
 20 A **Like I said, there was only -- and I**  
 21 **can't even recall, there may have been only been a**  
 22 **couple in the .gov subsection that were not deemed**

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1 **work related.**  
 2 Q Did you review each e-mail from that  
 3 first batch of e-mails that you reviewed with the  
 4 .gov e-mails?  
 5 MR. BREWSTER: Objection. Form.  
 6 A **Reviewed, yes. Yes.**  
 7 Q Did you open every e-mail to review for  
 8 purposes of determining whether it was  
 9 responsive -- or whether it was state related or  
 10 not?  
 11 A **I printed every e-mail.**  
 12 Q So let me clarify, then. And again we're  
 13 speaking just the initial review of just the  
 14 state -- not the state, I'm sorry, the .gov  
 15 e-mails that PRN sent either in July or August of  
 16 2014.  
 17 When you did an initial search to  
 18 determine which ones are responsive, are you --  
 19 did you print all of them out, whether they were  
 20 state related or personal in nature?  
 21 A **My recollection is yes. And my**  
 22 **recollection is that there were less -- there were**

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1 **very few, if any, that were deemed personal from**  
 2 **the .gov batch.**  
 3 Q Okay. So in the .gov batch, then my  
 4 understanding is that you did that review on hard  
 5 copies.  
 6 MR. BREWSTER: Objection. Form.  
 7 Q Is that correct?  
 8 A **So we're -- this was so long ago, I --**  
 9 **I --**  
 10 Q It was a pretty significant --  
 11 A **I printed it.**  
 12 Q -- process. Right?  
 13 A **I printed it. What I -- what I'm trying**  
 14 **to remember today is whether I reviewed it while I**  
 15 **was in my Outlook or whether I reviewed it when I**  
 16 **printed it or whether it was both, a combination**  
 17 **of both. I just don't recall, sitting here today,**  
 18 **what order it happened in.**  
 19 Q Okay. And I'm more interested not  
 20 whether there were printed or not, but rather  
 21 whether you opened up each e-mail and reviewed  
 22 each e-mail during that process to determine if it

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1 was state related or business related.  
 2 MR. BREWSTER: Objection. Form.  
 3 A **State related or personal? Not business.**  
 4 Q Personal, I'm sorry. State related or  
 5 personal. Thank you.  
 6 A **Like I said, that -- the .gov, the vast**  
 7 **majority went to the State Department. There -- I**  
 8 **don't want to say the whole, because there may**  
 9 **have been a couple that were pulled because they**  
 10 **were personal. I just can't remember today.**  
 11 Q So how did you come to see if the vast  
 12 majority of --  
 13 A **Yeah.**  
 14 Q -- of those e-mails in that batch with  
 15 the .gov e-mails, the vast majority of those  
 16 e-mails were state related, how did you come to  
 17 notice the ones that were personal in nature?  
 18 A **Because I reviewed them.**  
 19 Q And what I'm trying to understand is how  
 20 did that review process occur. Did you read each  
 21 e-mail or open each e-mail to determine whether it  
 22 was personal or state related?

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1 MR. BREWSTER: Objection. Form.  
 2 **A So – did I open? Yes. I printed each**  
 3 **e-mail. I did not read every line of each e-mail.**  
 4 **There were certain – if – yes, I – I**  
 5 **reviewed each e-mail. I'm not – I'm not sure how**  
 6 **else to answer your question.**  
 7 Q When you say you printed each e-mail, I  
 8 think that's where there's a little bit of -- at  
 9 least on my end I need some clarification.  
 10 When you say you printed each e-mail,  
 11 were those e-mails, the volume of e-mails that  
 12 were at that point determined to be state related,  
 13 or the printed batch, did that include the entire  
 14 universe of the .gov e-mails that PRN sent to you  
 15 in August of 2014?  
 16 MR. BREWSTER: Objection. Form.  
 17 **A I reviewed each e-mail. I printed each**  
 18 **e-mail. And they were provided to the department,**  
 19 **with the exception of maybe one or two, maybe,**  
 20 **that were personal in nature from the .gov batch.**  
 21 Q So sitting here today, you can't say that  
 22 you opened and read each e-mail from the .gov

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1 batch in processing -- or in reviewing whether  
 2 they were state related or personal in nature?  
 3 MR. BREWSTER: Objection. Asked and  
 4 answered.  
 5 **A They went to the State Department. I**  
 6 **reviewed the name, I reviewed the subject, I**  
 7 **reviewed the contents of the e-mail if it was**  
 8 **questionable as to whether it was personal or work**  
 9 **related.**  
 10 **But, again, if we're talking about the**  
 11 **.gov subsection, with the exception of maybe a**  
 12 **couple e-mails that were clearly personal in**  
 13 **nature, they were provided to the department.**  
 14 Q Okay. I understand your testimony that  
 15 the vast majority were provided to the State  
 16 Department. I'm trying to get a clear sense as to  
 17 what the methodology was used to do each of these  
 18 reviews. So that's what my questions are focusing  
 19 on.  
 20 **A I don't think that --**  
 21 MR. BREWSTER: But Ramona, she's answered  
 22 this question now several times. She opened them,

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1 she printed them, she reviewed them.  
 2 MS. COTCA: I don't think her testimony  
 3 is actually clear as to which ones she printed.  
 4 MR. BREWSTER: Okay.  
 5 Q Can you clarify which e-mails from the  
 6 .gov batch you printed and when? With respect to  
 7 the review process, not a specific date.  
 8 **A Look. I want to answer your question.**  
 9 **We're talking about something that happened five**  
 10 **years ago, and you're asking a really level of**  
 11 **specificity.**  
 12 **So my – my recollection is, I reviewed**  
 13 **the e-mails, I printed the .gov e-mails. If**  
 14 **you're asking if I printed these potentially one**  
 15 **or two that were personal in nature?**  
 16 Q Yes.  
 17 **A Maybe. But they were – I don't know. I**  
 18 **probably did. I don't remember.**  
 19 Q Okay. And I understand that time has  
 20 passed. But have you ever had any other occasion  
 21 to review government-related e-mails for a  
 22 high-level government official other than

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1 Secretary Clinton?  
 2 MR. BREWSTER: Objection. Foundation.  
 3 Outside the scope.  
 4 **A Since I left government?**  
 5 Q Ever.  
 6 **A I may have done document review while I**  
 7 **was at the White House Counsel's office.**  
 8 **Not that I recall.**  
 9 Q Okay. I guess I was going to ask you,  
 10 have you ever done document review in any other  
 11 litigation?  
 12 **A No, I have not.**  
 13 Q Okay. Okay. And moving into -- focusing  
 14 in on the second batch of the e-mails that PRN  
 15 sent.  
 16 And I'm sorry, did I ask you when did  
 17 they send those to you, time frame-wise?  
 18 **A It was sometime in the fall of -- early**  
 19 **fall of 2014.**  
 20 Q Okay. Now, I'll just represent to you  
 21 that I've just seen -- I've seen reference to it  
 22 being referred to in some of the FBI's 302 as a

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1 September export from PRN. So September time  
2 frame sounds about right to you?  
3 **A That sounds about right.**  
4 Q Okay.  
5 Okay. Can you walk me through the  
6 process as to how you reviewed those e-mails?  
7 **A Sure. It's -- so that was the process I**  
8 **was speaking of earlier. First we -- first I**  
9 **sorted the Inbox or Sent box by to and from.**  
10 Q And then you did a keyword search?  
11 **A And then after that I did a keyword**  
12 **search.**  
13 Q Okay.  
14 **A Well, I sent -- let me -- I just want to**  
15 **make sure my past testimony is clear.**  
16 **I sorted it by to and from. I looked at**  
17 **the names of the individuals that she had**  
18 **corresponded with. If I did not recognize the**  
19 **name, I looked it up. If the -- if it was an**  
20 **individual that she may correspond with on work**  
21 **and personal matters, I reviewed the contents of**  
22 **the e-mail. And I also did a keyword search,**

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1 **again with Libya and Benghazi. And I only name**  
2 **those because I know that they're relevant to this**  
3 **litigation.**  
4 Q Fair. Did you make a list of the keyword  
5 searches that you used to review Secretary  
6 Clinton's e-mails?  
7 MR. BREWSTER: Objection. Calls for  
8 privileged information.  
9 I'll ask her not to answer.  
10 MS. COTCA: What's the privilege that  
11 you're --  
12 MR. BREWSTER: You're asking for her  
13 mental processes on how she conducted it?  
14 MS. COTCA: No. My question is whether  
15 she created a list of the keyword searches that  
16 she used during this process.  
17 MR. BREWSTER: Okay. Can we have a quick  
18 conversation outside?  
19 MS. COTCA: Sure.  
20 VIDEO SPECIALIST: We are going off the  
21 record at 14:58.  
22 (A recess was taken.)

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1 VIDEO SPECIALIST: We are back on the  
2 record at 15:05.  
3 MR. BREWSTER: Ms. Cotca, I just want to  
4 make a representation to you. So we are trying to  
5 get through this without asserting privilege and  
6 withholding testimony at any point. So we're  
7 trying to give as fulsome -- have the witness  
8 testify as, you know, as broadly as she can  
9 without waiving privilege. So as I stated at the  
10 beginning, we're not -- none of our answers here  
11 are an intentional waiver of privilege.  
12 There is no exhaustive list of the search  
13 terms. But if you want to ask her about certain  
14 search terms, she will be able to tell you whether  
15 or not she recalls searching for them.  
16 BY MS. COTCA:  
17 Q Okay. But I guess my question will be, I  
18 mean, you used the term "exhaustive list." I  
19 just -- I want to ask if you or Ms. Mills or  
20 Mr. Kendall created a list of any kind that would  
21 have included the search terms that were going to  
22 be used for the review of these e-mails.

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1 MR. BREWSTER: And so there is -- there  
2 is no list that is comprehensive. There --  
3 MS. COTCA: Is there an incomplete list  
4 of the search terms that were used? And I guess I  
5 would ask the witness to answer if there is such  
6 an incomplete list.  
7 MR. BREWSTER: If you can answer that  
8 without divulging privileged information.  
9 MR. STEKLOFF: Well, are we -- we're on  
10 the record. Okay.  
11 MR. BREWSTER: Yeah.  
12 MR. STEKLOFF: For the methodology -- if  
13 you're trying to get to the methodology, maybe  
14 doing it timing-wise can avoid privilege. So if  
15 you can -- if you want to ask like -- I think your  
16 question sounds like you want to know beforehand  
17 whether any of those lawyers that you listed  
18 created a list before the review. I think she  
19 can -- I think she can answer that question  
20 without -- I think, as long as you -- without  
21 divulging privilege.  
22 BY MS. COTCA:

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1 Q Can you answer that?

2 **A Can -- whether we created a list at the**

3 **beginning of the review process?**

4 MR. STEKLOFF: Yeah. I don't -- if you

5 can answer that without divulging privilege, you

6 can answer it.

7 **A We discussed the review process, but I do**

8 **not believe a list was created at the beginning of**

9 **the process.**

10 Q Was a list created at any point during

11 the review process with the search terms that were

12 used during the review process of Secretary

13 Clinton's e-mails?

14 **A I don't recall a list being created at**

15 **any time during the process, no.**

16 Q Was a list created, after the process was

17 completed, of the search terms that were used

18 during the review of Secretary Clinton's e-mails?

19 **A Not a complete list.**

20 Q Okay. So there was -- there is an

21 incomplete list?

22 Is that what I understand your testimony

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1 to be?

2 MR. BREWSTER: Objection. Calls for

3 privileged information.

4 If you can ask for specific search terms,

5 I think that's -- we'll be able to answer those

6 questions.

7 (A discussion was held off the record.)

8 BY MS. COTCA:

9 Q So, Ms. Samuelson, your answer to my

10 earlier question whether a list was created after

11 the review process of the search terms used to

12 review Secretary Clinton's e-mails is, Not a

13 complete list.

14 So my followup question to that is, was

15 there an incomplete list created of the search

16 terms that were used to review Secretary Clinton's

17 e-mails after the review was complete?

18 MR. BREWSTER: Wait one second before you

19 answer.

20 MR. STEKLOFF: That -- that question

21 can't be answered without -- within -- without

22 violating attorney-client privilege.

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1 So we're happy to have you answer if she

2 used specific search terms. But we have to

3 instruct her not to answer that question.

4 MS. COTCA: And that is attorney-client

5 privilege that you are asserting?

6 MR. STEKLOFF: Yes.

7 MR. BREWSTER: And attorney work product.

8 MS. COTCA: I don't -- I don't see the

9 attorney-client privilege on that one.

10 MR. STEKLOFF: Okay.

11 I don't think she can answer the question

12 without divulging -- like, her -- her answer would

13 be based on attorney-client privileged

14 information.

15 MS. COTCA: Okay.

16 BY MS. COTCA:

17 Q When was any list, whether incomplete, of

18 the search terms that were used to review

19 Secretary Clinton's e-mails created?

20 MR. BREWSTER: I think that's okay.

21 MR. STEKLOFF: You can -- you can answer

22 that question.

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1 **A I did an after-action memo --**

2 Q And --

3 **A -- for lack of a better word.**

4 Q And the after-action memo, when did

5 you -- when did you do that?

6 **A It was after we provided the e-mails to**

7 **the department.**

8 Q Okay.

9 **A So I could memorialize.**

10 Q Okay. So can you narrow down the time

11 frame? Shortly after you provided the e-mails, or

12 a year later?

13 **A I -- it was shortly after, but I don't**

14 **recall the exact date.**

15 Q Okay. Was it in December of 2014?

16 **A It may have been.**

17 Q Okay. I want to ask you, with respect to

18 the search terms that you used to review Secretary

19 Clinton's e-mails, were there any discussions that

20 you, Ms. Mills, or Mr. Kendall had with the State

21 Department as to which -- what search terms should

22 be used?

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1 MR. BREWSTER: You're saying with the  
2 State Department, to be clear?  
3 MS. COTCA: With the State Department  
4 officials. Correct.  
5 MR. BREWSTER: Okay.  
6 **A Again, the search terms that I think**  
7 **you're referring to were really just a catch-all**  
8 **to make sure that I didn't miss anything along the**  
9 **way.**  
10 **I don't recall having any conversations**  
11 **with the State Department on those.**  
12 Q Do you know if Ms. Mills or Mr. Kendall  
13 had any discussions with anybody at the State  
14 Department about what the appropriate search terms  
15 should be used to review Secretary Clinton's  
16 e-mails?  
17 MR. BREWSTER: Objection. Form.  
18 **A I don't think the State Department**  
19 **provided us with search terms.**  
20 Q Did you request from the State Department  
21 for them to provide you with search terms to use  
22 to review Secretary Clinton's e-mails?

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1 **A No. We were informed by the State**  
2 **Department that it was each individual's personal**  
3 **responsibility to go through their e-mail and make**  
4 **the determination of what is personal and what is**  
5 **work related, based on guidance in the Foreign**  
6 **Affairs manual.**  
7 Q And who from the State Department  
8 informed you of that?  
9 **A I don't recall.**  
10 Q Was there a point of contact or certain  
11 individuals who either you, Ms. Mills, or  
12 Mr. Kendall communicated with at the State  
13 Department during this process, for purposes of  
14 the review of Secretary Clinton's e-mails?  
15 **A So I only communicated with -- with**  
16 **individuals at the department after the review was**  
17 **conducted in my -- in my recollection.**  
18 Q Okay.  
19 **A And that was about providing the**  
20 **materials to the department.**  
21 Q Okay. That was when delivery was made of  
22 the 30-some-thousand e-mails to the State

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1 Department in December of 2014? Is that --  
2 **A Correct.**  
3 Q Okay. And what about Ms. Mills or  
4 Mr. Kendall, if you know, who they were in touch  
5 with at the State Department during this process  
6 for purposes of the review of Secretary Clinton's  
7 e-mails?  
8 MR. BREWSTER: Objection. Form and  
9 foundation.  
10 **A I don't know.**  
11 Q Do you know if -- well, let me ask you.  
12 Were you in contact with Under Secretary Patrick  
13 Kennedy for purposes of returning the e-mails to  
14 the State Department?  
15 MR. BREWSTER: Objection. Form.  
16 **A My recollection is I spoke with**  
17 **Mr. Kennedy's chief of staff.**  
18 Q And who was that at the time?  
19 **A Kathleen Austin-Ferguson.**  
20 Q Did you speak with anybody else at the  
21 State Department during this time frame about  
22 returning the e-mails to the State Department?

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1 **A I may have. She's just the only person**  
2 **that I remember.**  
3 Q So going back to the search terms that  
4 you used during the review process of Secretary  
5 Clinton's e-mails. I want to ask you if you used  
6 specific terms if you recall, sitting here today.  
7 Did you use the search term "ambassador"?  
8 **A I may have.**  
9 Q Sitting here today, do you know if you  
10 used the search term "ambassador" or not?  
11 **A I searched a number of ambassadors by**  
12 **name, but I -- I can't tell you, sitting here**  
13 **today, if I used that search term or not.**  
14 Q So I meant specific -- I'm not asking you  
15 for specific names who were ambassadors. But the  
16 term "ambassador," did you use that search term  
17 during your review of Secretary Clinton's e-mails?  
18 **A I may have.**  
19 Q Do you still have a copy of the  
20 after-action memo that you created in or around  
21 December of 2014?  
22 **A In my possession?**



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1 Q Yes. You are still serving as the  
2 attorney for Secretary Clinton. Correct?

3 A **Correct.**

4 Q Okay. So do you still have a copy of the  
5 after-action memo that you created in or around  
6 December of 2014 memorializing the search you did  
7 for Secretary Clinton's e-mails?

8 A **I may.**

9 Q Who else has a copy of the after-action  
10 memo that you provided to?

11 A **Well, it was -- it was with her**  
12 **attorneys. I can't speak to who -- who kept the**  
13 **memo.**

14 Q Okay. So when you're referring to "her  
15 attorneys," are you just referring to Cheryl Mills  
16 and David Kendall?

17 A **Yes, I'm referring to David Kendall, yes.**

18 Q Okay. Any -- any other attorneys?

19 A **Not that I can think of for this.**

20 Q Did you review your after-action memo  
21 that you created in or around December of 2014 in  
22 preparation for today's deposition?

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1 MR. BREWSTER: Objection. Calls for  
2 privileged information.

3 I'll instruct her not to answer.

4 Q Okay. Sitting here today, you're not  
5 able to say for sure that you used the term  
6 "ambassador" as a key search term to review  
7 Secretary Clinton's e-mails. Is that right?

8 A **That's correct. But, again, the keywords**  
9 **were really just spot checking, to make sure we**  
10 **didn't miss anything in the full review that we**  
11 **already went over.**

12 Q And I understand your testimony and what  
13 you're saying about that. But I'm trying to get  
14 an understanding of specific key -- keyword terms  
15 that were used to search Secretary Clinton's  
16 e-mails that are relevant to Judicial Watch's FOIA  
17 request in this case.

18 Did you use "Rice" --

19 A **I did.**

20 Q -- as a search term?

21 A **I did. She was one of the names that I**  
22 **searched.**

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1 Q Okay. And how did you search for  
2 Ambassador Susan Rice? How did you use that  
3 search term?

4 A **Well, first, as I said, I had sorted her**  
5 **Inbox by to and from so I would look at any**  
6 **e-mails she had between herself and Secretary**  
7 **Rice. And then I also searched for names of**  
8 **senior department officials.**

9 Q So when you did this search for the names  
10 of senior department officials, did you just  
11 use -- use the word "Rice" alone?

12 A **I -- I couldn't tell you today. It was**  
13 **five years ago.**

14 Q Okay. But that is information that you  
15 have available that would be contained in the  
16 after-action memo that you created in December of  
17 2014.

18 MR. BREWSTER: Objection.

19 Q Is that correct?

20 MR. BREWSTER: Calls for privileged  
21 information for attorney work product.

22 MS. COTCA: I'm just saying that she has

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1 the after action -- I'm asking that -- for her to  
2 confirm that she has the after-action memo that  
3 she created in or around December of 2014.

4 MR. BREWSTER: Your question as phrased  
5 is asking for the contents of a privileged memo.

6 MS. COTCA: No. Let me rephrase it,  
7 if -- if that's the way that you're understanding  
8 the question.

9 BY MS. COTCA:

10 Q My question is, would you be able to  
11 determine by looking at your after-action memo  
12 that you created in December of 2014 whether you  
13 used the term "Rice" alone as part of the keyword  
14 search?

15 MR. BREWSTER: Objection. Calls for  
16 privileged information. I'm going to instruct her  
17 not to answer.

18 MS. COTCA: And, again, what's the  
19 privilege that you are asserting for that?

20 MR. BREWSTER: Attorney work product.

21 Q Did you use the search term "U.S.U N/W"?

22 A **Not that I recall.**

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1 Q Did you use the search term September  
2 September 11, comma, 2012, as a search term?  
3 **A September 11, comma, 2012?**  
4 Q The date September 11, 2012, did you use  
5 the date as a search term?  
6 **A Again, I reviewed all e-mails that she**  
7 **had on that day. I don't know what -- recall**  
8 **whether I used that specific date or any different**  
9 **idiosyncrasy of that date.**  
10 Q Okay. You're familiar that the attacks  
11 in Benghazi occurred on that date, September 11,  
12 2012, are you not?  
13 **A Oh, of course I am.**  
14 Q Okay. And would you be able to  
15 determine, by looking at the after-action memo  
16 that you created in or around December of 2014,  
17 whether you used the search term "September 11,  
18 2012" during your review of Secretary Clinton's  
19 e-mails?  
20 MR. BREWSTER: Same as prior objections.  
21 I'll instruct the witness not to answer.  
22 MS. COTCA: Okay.

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1 Q Did you use the search term "attack" when  
2 you reviewed Secretary Clinton's e-mails?  
3 **A Again, the search terms were only to spot**  
4 **check. I searched by individual, by names. I**  
5 **sorted the Inbox. We had a multi-layer process.**  
6 **The search terms that you're focused on was really**  
7 **just a spot check in one part of the process.**  
8 Q Okay. Did you use that search term?  
9 **A I may have. But, again, it was just one**  
10 **part of the process.**  
11 Q Are you aware that the search terms that  
12 I've mentioned to you, these are the search terms  
13 that the State Department used to search for  
14 responsive records in this case that Judicial  
15 Watch has against the State Department?  
16 MR. BREWSTER: Objection. Form.  
17 Foundation.  
18 **A I am not.**  
19 Q Okay. So my question, again, is whether  
20 you used the search term "attack" during your  
21 review of Secretary Clinton's e-mails.  
22 MR. BREWSTER: Objection. Asked and

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1 answered.  
2 **A I may have. But, again, I don't think**  
3 **this is -- again, as I've said many times before,**  
4 **this was just one part of the process.**  
5 Q And I understand that. I'm just trying  
6 to understand if you used the search term or not,  
7 so we can just do yes or no as far as you recall.  
8 MR. BREWSTER: And she has answered the  
9 question now twice, as referring to "attack."  
10 Q And as I asked before, are you able to  
11 determine, by looking at the after-action memo  
12 that you created in or around December of 2014,  
13 whether you used the search term "attack" to  
14 review Secretary Clinton's e-mails?  
15 MR. BREWSTER: Objection. Calls for  
16 privileged information.  
17 I'll instruct the witness not to answer.  
18 MS. COTCA: And again, is that work  
19 product privilege?  
20 MR. BREWSTER: That is.  
21 MS. COTCA: Thank you.  
22 Q Did you use the search term "talking

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1 points" for your review of Secretary Clinton's  
2 e-mails?  
3 **A Again, these search terms that -- that**  
4 **I -- the keywords that I did at the end of the**  
5 **process were a spot check.**  
6 Q I'm not asking what they --  
7 **A I sorted the e-mails to and from.**  
8 MR. BREWSTER: She --  
9 Q Sorry.  
10 **A I reviewed -- I searched individuals'**  
11 **names. I had a multi-layer process.**  
12 **And that's not even including the .gov**  
13 **e-mails that were placed in the work-related bin.**  
14 **So I don't -- what -- what word did you**  
15 **ask for?**  
16 Q So my question was actually whether -- it  
17 was very simple, yes or no. Whether you used the  
18 search term "talking points" for your review of  
19 Secretary Clinton's e-mails.  
20 **A So what, did I actually put in that word**  
21 **in -- in Outlook? I -- I don't recall. But,**  
22 **again, like all of these words, they would have**

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**1 come up in other e-mails in -- in the review, in**  
**2 the other pieces of the review process.**  
3 Q And as I asked before, would you be able  
4 to determine whether you used the search term  
5 "talking points" by reviewing the after-action  
6 memo that you created in or around December of  
7 2014 for purposes of reviewing Secretary Clinton's  
8 e-mails?  
9 MR. BREWSTER: Same objection as before.  
10 Asks for attorney mental impressions and work  
11 product.  
12 I'll instruct the witness not to answer.  
13 MS. COTCA: Okay.  
14 Q Did you use the search term "TPs" T --  
15 for talking points?  
**16 A I don't recall. But, again, as I said**  
**17 before, this was only one part of the process. We**  
**18 had a multi-layer process that I've described**  
**19 multiple times now.**  
20 Q Okay. As I asked before, would you be  
21 able to determine whether you used the search term  
22 "TPs" for talking points by looking at the

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1 after-action memo that you created in or around  
2 December of 2014 for your review of Secretary  
3 Clinton's e-mails?  
4 MR. BREWSTER: Objection. Calls for  
5 attorney work product and mental impressions.  
6 I'll instruct the witness not to answer.  
7 Q And one more specific search term that I  
8 had is whether you used the term "updates" during  
9 your review of Secretary Clinton's e-mails?  
**10 A "Updates"?**  
11 Q Yes.  
**12 A That would provide quite a number of**  
**13 documents, I would think. That's a very common**  
**14 word. But I may have. I don't recall. But**  
**15 again, it was part of a multi-layer process.**  
16 Q And as before, would you be able to  
17 determine whether you used the search term  
18 "updates" to search Secretary Clinton's e-mails by  
19 reviewing your after-action memo that was created  
20 in or around December of 2014?  
21 MR. BREWSTER: Objection. Calls for  
22 attorney work product and mental impressions.

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1 I'll instruct the witness not to answer.  
2 Q Do you know if the after-action memo that  
3 you created in or around December of 2014, if that  
4 has been provided to anybody else outside of David  
5 Kendall?  
**6 A Not to my knowledge.**  
7 Q Okay. So I believe your testimony was  
8 that you received approximately 60,000 e-mails  
9 from PRN during the second -- the second review  
10 that you did.  
11 And how many did -- were determined as a  
12 result of the review process to be State related?  
**13 A I believe just over 30,000.**  
14 Q Is it 30,490, does that sound right?  
**15 A That's --**  
16 MR. BREWSTER: Objection. Foundation.  
**17 A That number sounds correct to me.**  
18 Q Okay.  
19 THE WITNESS: Would it be okay if I took  
20 a break?  
21 MS. COTCA: Of course.  
22 THE WITNESS: Sorry. It's a little bit

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1 after lunch.  
2 MS. COTCA: Of course.  
3 VIDEO SPECIALIST: We are going off the  
4 record at 15:28.  
5 (A recess was taken.)  
6 VIDEO SPECIALIST: We are back on the  
7 record at 15:38.  
8 BY MS. COTCA:  
9 Q Ms. Samuelson, so during the sorting  
10 process, I understand you went through the first  
11 step of looking at to and from, and then you did  
12 the keyword search?  
**13 A I did to, from, and then I searched**  
**14 department officials' names and others that she**  
**15 may have corresponded with.**  
16 Q Okay.  
**17 A And then I did keyword searches.**  
18 Q Okay. And so --  
**19 A And that was on the non.gov.**  
20 Q Sorry. Thank you.  
21 So with respect to the names that you  
22 searched, did -- does your after-action memo that

201	203
1 you created in or around December of 2014 contain	1 Correct?
2 a list of the individuals who you searched for	2 <b>A Correct.</b>
3 during the review of Secretary Clinton's e-mails?	3 Q Okay. And after you completed that, what
4 MR. BREWSTER: Objection. Calls for	4 was next in the process of the review?
5 privileged information under the work product	5 <b>A I printed out those e-mails that were</b>
6 privilege.	6 <b>work related.</b>
7 I'll instruct the witness not to answer.	7 Q Okay. So you used that to sort to
8 MS. COTCA: I'm not asking for any	8 determine what was work related and what was not.
9 specific names. I'm just asking if a list --	9 Correct?
10 MR. BREWSTER: A list exists?	10 <b>A Correct.</b>
11 MS. COTCA: Exists.	11 Q And do you recall the exact number of the
12 MR. BREWSTER: Okay. Then I'll allow her	12 e-mails that were contained in the universe of
13 to answer.	13 e-mails that you initially reviewed?
14 MS. COTCA: Thank you.	14 MR. BREWSTER: Objection. Form.
15 <b>A There may be. I don't recall.</b>	15 <b>A How many were in the full Inbox?</b>
16 Q Okay. And would you be able to determine	16 Q Yes.
17 if the list -- lists exists -- exists of the names	17 <b>A Well, what I received from Platte River?</b>
18 you searched for during the review of Secretary	18 Q Yes.
19 Clinton's e-mails by looking or reviewing the	19 <b>A I -- it was over 60,000. I don't</b>
20 after-action memo that you created in or around	20 <b>remember the exact number.</b>
21 December of 2014?	21 Q Okay.
22 MR. BREWSTER: Wait one second.	22 (Samuelson Deposition Exhibit 13 marked
202	204
1 MR. STEKLOFF: Can we just step out for a	1 for identification, retained by counsel.)
2 second?	2 MS. COTCA: That's the only copy.
3 MS. COTCA: Sure.	3 Steve, it's a letter from Mr. David
4 VIDEO SPECIALIST: Going off the record	4 Kendall to Trey Gowdy, dated March 27, 2015. And
5 at 15:40.	5 it is marked Exhibit 13.
6 (A recess was taken.)	6 And just for the record, Steve, it's
7 VIDEO SPECIALIST: We are back on the	7 marked as DOS-3742 at the bottom, with State
8 record at 15:44.	8 Department's Bates stamp. Goes all the way from
9 BY MS. COTCA:	9 one to nine. It's a nine-page letter.
10 Q Ms. Samuelson, would you be able to	10 MR. BREWSTER: Is there a specific part
11 determine, by reviewing the after-action memo that	11 of this you're going to direct her to?
12 you created in or around December of 2014, whether	12 MS. COTCA: Yes.
13 a list is -- was created with the names of the	13 Q I just want to direct you, Mr. Samuelson,
14 individuals you -- you searched for during your	14 to the second page, the first full paragraph.
15 review of Secretary Clinton's e-mails?	15 Where it talks about your review of these e-mails
16 MR. STEKLOFF: She can answer.	16 and the number of e-mails that were reviewed.
17 MR. BREWSTER: Yeah.	17 <b>A I see that.</b>
18 <b>A Yeah, I may. I may be able to.</b>	18 Q Okay.
19 Q Okay. So after the -- so this was the	19 MS. COTCA: And, for the record, this is
20 three-step sorting process, again the review of	20 a letter from David Kendall, Secretary Clinton's
21 the to's and from's, the searching of specific	21 attorney, to Congressman Trey Gowdy, the chair of
22 names, and then specific keyword searches.	22 the Select Committee on Benghazi, dated March 27,

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1 2015.  
2 Q Is that an accurate representation of  
3 this exhibit?  
4 A Yes.  
5 Q Okay. Thank you.  
6 And Mr. Kendall in this first full  
7 paragraph on the second page represents that a  
8 total of 62,320 e-mails were reviewed that were  
9 from Secretary Clinton's e-mail account  
10 [hdr22@clintonemail.com](mailto:hdr22@clintonemail.com).  
11 Does that sound like an accurate number  
12 as to the e-mails that you reviewed?  
13 A It does.  
14 Q Okay. Do you have any reason to dispute  
15 this number?  
16 A No.  
17 Q Okay. And then, again, it also states  
18 that, "As a result of the review process, 30,490  
19 e-mails were identified as work related and  
20 potentially work-related e-mails that were  
21 provided to the State Department on December 5th,  
22 2014."

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1 Do you see that?  
2 A I do.  
3 Q Okay. And is that a fair number, as --  
4 as you recall, with respect to the number of  
5 e-mails that were produced by Secretary Clinton to  
6 the State Department in December of 2014?  
7 A Yes.  
8 Q Okay. Do you have any reason to dispute  
9 that this number is not accurate?  
10 A No.  
11 Q Okay. Thank you. That's all I have with  
12 that exhibit.  
13 A Oh, okay. It was very long.  
14 Q It is. I just wanted to get the numbers  
15 right.  
16 And then once that sorting process was  
17 complete, what -- what was the next process in the  
18 review?  
19 MR. BREWSTER: Objection. Asked and  
20 answered.  
21 A I'm sorry, I don't understand your  
22 question.

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1 Q So you went through the three-step  
2 process to determine which ones are potentially  
3 work related. Correct?  
4 A Correct.  
5 Q Okay. And then what did you do next with  
6 respect to the ones that you identified as  
7 potentially work related?  
8 A I printed them.  
9 Q Okay. And then what did you do once they  
10 were printed?  
11 A We provided them to department.  
12 Q Was there any other review that was done  
13 of those records by either Cheryl Mills or David  
14 Kendall?  
15 MR. BREWSTER: Objection. To the extent  
16 you can answer without divulging attorney work  
17 product privilege.  
18 A I don't -- I don't believe so.  
19 Q And I don't want to trick you. So I know  
20 some of this is discussed in the FBI's 302, so  
21 I'll just show that to you so you can refer to it.  
22 A Okay.

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1 MR. BREWSTER: She's going to mark your  
2 copy.  
3 (Samuelson Deposition Exhibit 14 marked  
4 for identification, retained by counsel.)  
5 Q Have you had a chance to review it?  
6 A I haven't reviewed the full thing  
7 right -- sitting right here, but I have seen this  
8 document before.  
9 Q Okay. And just for the record, this is  
10 Exhibit 14, and it's a copy of the FBI's 302 notes  
11 of their interview from you -- of you on May 25th,  
12 2016.  
13 Is that accurate?  
14 A That's correct.  
15 Q Okay. And does this at all refresh your  
16 recollection as to whether there was any other  
17 review done of the 30,490 e-mails after you  
18 printed them out?  
19 MR. BREWSTER: Objection. Form.  
20 Foundation.  
21 A So I recall that I provided -- that I  
22 shared some e-mails with Sheryl and David. I

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**1 don't know that they reviewed all 32,000 -- or**  
**2 30,000 or however many it was.**  
3 Q Okay. And of the ones that Mr. Kendall  
4 and/or Ms. Mills reviewed, were there any that as  
5 a result were determined to be nonresponsive and  
6 were shredded?  
7 **A I don't recall.**  
8 Q Can I turn you to paragraph -- Page 4 of  
9 your -- of the exhibit. The second to the last  
10 paragraph. Where it begins with, "Upon completing  
11 the review, Samuelson printed all the e-mails she  
12 deemed to be relevant. The paper copies were then  
13 subsequently reviewed by Mills and Kendall, and  
14 anything they deemed not to be work related was  
15 shredded."  
16 Do you see that?  
17 **A I do.**  
18 Q So just trying to understand the paper  
19 copies, though, were subsequently reviewed by  
20 Ms. Mills and Mr. Kendall, were they just a subset  
21 of the ones that you identified as relevant, or  
22 was it the entire set of the e-mails that you

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1 identified as relevant?  
2 MR. BREWSTER: One second.  
3 I'll object to form. If you understand  
4 the question, you may answer.  
5 **A Again, I'm -- I'm trying to remember,**  
**6 because it was so long ago.**  
7 **I do not know that they reviewed all**  
**8 30,000 that were provided to the department.**  
9 Q Okay.  
10 **A I know ...**  
11 **I know they reviewed some, but I do not**  
**12 know if they reviewed all 30,000.**  
13 Q Okay. And, again, you don't -- do you  
14 recall whether any as a result of Ms. Mills'  
15 review and/or Mr. Kendall's review, any of the  
16 e-mails were as a result deemed not to be work  
17 related and were shredded?  
18 **A I don't recall.**  
19 Q Okay.  
20 MR. BREWSTER: You're done with this,  
21 Ramona?  
22 MS. COTCA: Yes. For now, I mean.

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1 MR. BREWSTER: Okay.  
2 MS. COTCA: Put it next to you. I may  
3 have questions.  
4 (Samuelson Deposition Exhibit 15 marked  
5 for identification, retained by counsel.)  
6 MR. BREWSTER: So, Ramona, again this is  
7 a compilation of, or is this one document?  
8 MS. COTCA: Well, actually, they were  
9 produced by the State Department. And the Bates  
10 numbers appear on the bottom. DOS 1024, 1025, and  
11 1026.  
12 MR. BREWSTER: Okay.  
13 MS. COTCA: As to whether it was  
14 contained as one document by the State Department,  
15 I'm not sure.  
16 MR. PEZZI: I don't recall whether this  
17 was produced as one document or three documents.  
18 But they do appear to have sequential Bates  
19 numbers.  
20 MS. COTCA: Yes.  
21 MR. BREWSTER: Okay.  
22 Q Ms. Samuelson, just for the record,

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1 what's been marked as Exhibit 15 is a letter from  
2 Ms. Mills to Patrick Kennedy, dated December 5th,  
3 2014. And an acknowledgment of receipt and a  
4 transmittal memorandum for the e-mails that were  
5 delivered to the State Department also on December  
6 5th, 2014.  
7 Is that a fair representation?  
8 **A Yes.**  
9 Q Okay. Thank you.  
10 Is -- I want to ask you about the  
11 acknowledgment of receipt.  
12 Is this something that was created by you  
13 or any of Secretary Clinton's attorneys?  
14 **A It was not created by me. It may have**  
**15 been created by her other attorneys.**  
16 Q Okay. Were you --  
17 **A Let me back up. I don't recall creating**  
**18 this document five years ago.**  
19 Q Okay. That's fair.  
20 Were -- were you present at the time that  
21 the State Department officials picked up the 12  
22 boxes of Secretary Clinton's e-mails from

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1 Williams & Connolly?  
2 **A I was not.**  
3 Q Okay. Did you coordinate with the State  
4 Department the pickup of the boxes?  
5 **A Yes, I did help facilitate that.**  
6 Q Okay. On the third page of the exhibit,  
7 in the transmittal memorandum, where it says,  
8 "Received from Tanya M. Abrams."  
9 Do you know who Tanya M. Abrams is?  
10 **A I believe she is an associate at**  
11 **Williams & Connolly.**  
12 Q And do you recall the fact that there  
13 were indeed 12 boxes of e-mails that were produced  
14 to the State Department?  
15 **A Yes.**  
16 Q Was there a discussion at some point  
17 about there being 14 boxes to be produced?  
18 **A My recollection of this, because I've**  
19 **seen it in the press, is that when I was**  
20 **facilitating the release, I was still packing them**  
21 **in boxes, and I didn't know if it was going to be**  
22 **12 or 13 or 14 or more or less. And it ended up**

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1 **being 12.**  
2 Q Okay. And according to the  
3 acknowledgment of receipt, it looks like the boxes  
4 were -- or the e-mails contained in the boxes were  
5 organized in chronological order.  
6 Did you actually pack up the boxes and  
7 provide the copies of the e-mails in the boxes  
8 that were produced to the State Department?  
9 **A I did.**  
10 Q Okay. Is that -- well, let me ask you:  
11 How did you organize and place the e-mails in the  
12 boxes?  
13 **A By date.**  
14 Q Okay. Did you pull out e-mails that  
15 related to the Benghazi attacks and provide those  
16 in a separate batch of documents?  
17 **A Not that I recall.**  
18 Q You don't recall grouping e-mails  
19 relating to the Benghazi attacks separately from  
20 the rest of the e-mails in 2012?  
21 MR. BREWSTER: Objection. Form.  
22 **A I -- I don't understand your question.**

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1 **In -- in -- when we provided the e-mails to the**  
2 **department in 2014?**  
3 Q Right. But I'm asking with respect to  
4 the box -- Box Number 10 and 11 -- well, I guess  
5 and 13. The ones relevant for the time frame of  
6 2012, did you organize or sort e-mails that were  
7 specifically related to the Benghazi attack and  
8 group them together separately from the rest of  
9 the e-mail from -- e-mails from that time frame?  
10 **A I do not recall doing that.**  
11 Q Do you know if Ms. Mills did that?  
12 MR. BREWSTER: Objection. Form.  
13 **A I don't believe she would have, but I --**  
14 **I don't know.**  
15 Q Okay. How about Mr. Kendall; do you know  
16 if he did that?  
17 MR. BREWSTER: Same objection.  
18 **A Again, I don't -- I don't know. I don't**  
19 **believe he would, but I don't know.**  
20 Q Do you know if any -- do you know if  
21 Ms. Abrams or any of the other attorneys or  
22 employees working at Williams & Connolly would

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1 have done that?  
2 **A I -- I don't know. I didn't know that it**  
3 **was done.**  
4 Q When did you pack the boxes with the  
5 e-mails?  
6 **A Short -- sorry, I'm just trying to think.**  
7 **It was a long time ago.**  
8 **It was -- I mean, it was shortly before**  
9 **we -- we provided them to the department.**  
10 Q And where did you pack the boxes with  
11 Secretary Clinton's e-mails?  
12 **A In cdMills Group's office.**  
13 Q And where was that office?  
14 **A It was in Friendship Heights.**  
15 Q Do you remember at what point the boxes  
16 were transferred from Ms. Mills' office to  
17 Williams & Connolly?  
18 **A It was shortly before the department**  
19 **picked them up, but I don't recall the exact date.**  
20 Q Okay. I'm done with that.  
21 (A discussion was held off the record.)  
22 (Samuelson Deposition Exhibit 16 marked

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1 for identification, retained by counsel.)  
2 BY MS. COTCA:  
3 Q Ms. Samuelson, if you can look at what's  
4 been marked as Exhibit 16 and let me know once  
5 you've had a chance to review that.  
6 **A Okay.**  
7 Q And just for the record, this is an  
8 e-mail from State Department official William  
9 Fischer, to Margaret Grafeld, cc'ing John Hackett,  
10 Eric Stein -- Eric Stein, Celeste Houser-Jackson,  
11 and the subject matter is "S e-mail dated December  
12 3, 2014." Is that a fair representation?  
13 **A That is. Correct.**  
14 Q Okay. Thanks.  
15 I just want to point you to the last  
16 sentence in that e-mail. Well, the last two  
17 sentences. Where it says, "Clarence said this is  
18 to remove any personal material that may be  
19 included in the collection."  
20 And "the collection" is referring to the  
21 e-mails that Secretary Clinton would be returning  
22 to the State Department.

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1 And he's seeking instructions explaining  
2 how this process should be carried out in the  
3 event I'm contacted by a representative of a  
4 former Secretary.  
5 Did -- my question to you is, did you  
6 have any discussions with either Mr. Finney or  
7 anybody else from the State Department with  
8 respect to any instructions explaining how --  
9 or -- or the process as to how they would review  
10 whether any of the e-mails being returned were  
11 personal in nature?  
12 MR. PEZZI: Objection to form and  
13 foundation.  
14 MR. BREWSTER: Objection to form. Same  
15 objections.  
16 **A I don't recall speaking to Clarence**  
17 **Finney. I don't -- I don't recall this.**  
18 Q Okay. Do you recall receiving any  
19 explanation from anybody at the State Department  
20 with respect to how they would carry out the  
21 process of determining whether any e-mails would  
22 be considered personal?

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1 **A No.**  
2 Q Okay. That's all.  
3 MS. COTCA: Can we take a -- can we go  
4 off the record.  
5 VIDEO SPECIALIST: We are going off the  
6 record at 16:07.  
7 (A recess was taken.)  
8 VIDEO SPECIALIST: We are back on the  
9 record at 16:15.  
10 BY MS. COTCA:  
11 Q Ms. Samuelson, just a few more questions.  
12 As part of your review for records to  
13 return to the State Department, are you aware if  
14 Secretary Clinton returned any memos?  
15 **A We did provide attachments to the**  
16 **e-mails, and that sometimes included memos.**  
17 Q Okay. What about notes that would be  
18 saved in the memos app on Secretary Clinton's  
19 BlackBerrys; did you request PRN to provide you  
20 copies of notes contained in that app for your  
21 review as to whether those notes related to State  
22 Department business or not?

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1 MR. BREWSTER: Objection. Form.  
2 Foundation.  
3 If you know.  
4 **A No, we did not. I only requested her**  
5 **e-mails.**  
6 Q Okay. What about any drafts of e-mails;  
7 did you request any drafts of e-mails from PRN for  
8 review to determine whether they were State  
9 related or not?  
10 MR. BREWSTER: Same objections.  
11 **A I think we discussed this earlier about**  
12 **drafts.**  
13 **I recall asking Platte River Networks for**  
14 **any e-mails from January 2009 to February 2013. I**  
15 **do not believe that there was any drafts in what**  
16 **they provided me, but there could have been.**  
17 Q In 2014, when you did the review, were  
18 you aware that Secretary Clinton used the memos  
19 app on her BlackBerry while she was Secretary of  
20 State?  
21 **A I don't know --**  
22 MR. BREWSTER: Objection. Form.



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1 Foundation.

2 **A I don't know if she did or didn't use**

3 **that app.**

4 Q Were there any discussions with respect

5 to whether notes contained in such apps on her

6 BlackBerry, whether those need to be requested

7 from PRN for purposes of reviewing whether they

8 need to be returned to the State Department?

9 **A Discussions with whom?**

10 Q Well, with anyone. In 2014.

11 MR. BREWSTER: Objection.

12 To the extent you can answer the question

13 without divulging privileged information, you can

14 answer.

15 **A I don't recall having any discussions on**

16 **that.**

17 Q Okay. Were there any discussions -- and

18 you may have touched on this earlier -- with State

19 Department officials about the process and the

20 parameters that you used to search and review

21 Secretary Clinton's e-mails prior to returning

22 them to the State Department?

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1 MR. BREWSTER: Objection. Asked and

2 answered.

3 **A I believe I answered this earlier. I**

4 **don't recall having any specific conversations**

5 **with State Department officials regarding**

6 **parameters for the review.**

7 Q Thank you.

8 And do you know if Patrick Kennedy ever

9 requested such information from Secretary Clinton?

10 MR. BREWSTER: Objection. Form.

11 **A What information?**

12 Q With respect to the -- well, let me start

13 the question all over again.

14 Are you aware whether Patrick Kennedy

15 made any request to Secretary Clinton for the

16 search parameters used during the review process

17 of Secretary Clinton's e-mails?

18 MR. BREWSTER: Objection. Form.

19 MR. PEZZI: Same objection.

20 **A I'm not -- I'm not aware of any request**

21 **by Under Secretary Kennedy.**

22 Q Are you aware of any such request from --

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1 that was made to Secretary Clinton by anybody else

2 from the State Department?

3 **A About search parameters?**

4 Q Yes. The same question. So let me start

5 all over again.

6 Are you aware of any request made by

7 anybody else from the State Department to

8 Secretary Clinton with respect to what search

9 parameters were used during the review process of

10 Secretary Clinton's e-mails?

11 MR. PEZZI: Objection. Form.

12 MR. BREWSTER: Same objection.

13 **A I am not.**

14 Q Did you know that at least one State

15 Department official was, to use his term,

16 "emphatic" in his discussions with Patrick Kennedy

17 that the State Department needed the search

18 parameters that were used for purposes of

19 conducting the review process of Secretary

20 Clinton?

21 MR. BREWSTER: Objection. Form.

22 Foundation.

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1 MR. PEZZI: Same objections.

2 **A I am not.**

3 Q If the State Department made a request to

4 Secretary Clinton at this time to provide the

5 search parameters that were used for the review of

6 Secretary Clinton's e-mails, would Secretary

7 Clinton provide that to the State Department?

8 MR. BREWSTER: Objection. Form.

9 Foundation.

10 MR. PEZZI: Same objections.

11 MR. STEKLOFF: At what time? Are you

12 saying today?

13 MS. COTCA: Today.

14 **A I'm confused.**

15 MR. BREWSTER: If you know.

16 MR. STEKLOFF: Yeah, if you know.

17 **A Could you repeat your question? I'm a**

18 **little bit confused.**

19 MS. COTCA: Can you just read it back to

20 her.

21 (The Reporter read the record as follows:

22 "QUESTION: If the State Department made

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1 a request to Secretary Clinton at this time to  
2 provide the search parameters that were used for  
3 the review of Secretary Clinton's e-mails, would  
4 Secretary Clinton provide that to the State  
5 Department?")  
6 **A So we posted the -- I shouldn't say "we."  
7 The -- her presidential campaign posted the --  
8 regarding the search process on their campaign  
9 website in 2015. So I am familiar that  
10 information has been released about this.**  
11 Q I'm asking specifically with respect to  
12 what search terms were used and what names were  
13 used during the review process.  
14 **A I can't speak to that.**  
15 Q Why not?  
16 **A I would have to consult other counsel.**  
17 Q I believe you, during your interview with  
18 the FBI, you were asked about a gap in e-mails  
19 that you noticed in Secretary Clinton's e-mails  
20 from January 2009 to March of 2009.  
21 Do you recall that?  
22 MR. BREWSTER: Objection. Foundation.

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1 **A I do.**  
2 Q Okay. Can you explain to me what that  
3 gap was?  
4 **A My understanding is -- well, I'm sorry.  
5 I should say my recollection is when we received  
6 the documents -- the file from Platte River  
7 Networks, there was a period of time that was  
8 missing in her e-mails. And that period of time  
9 was January 2009 to March 2009.**  
10 Q And what did you do as the result of  
11 discovering this gap in the e-mails from January  
12 2009 to March 2009?  
13 MR. PEZZI: Objection. Beyond the scope.  
14 MR. BREWSTER: Same objection.  
15 **A I asked Platte River why we did not  
16 have -- why they did not provide those.**  
17 Q And what did they tell you?  
18 **A They said they did not have that  
19 information.**  
20 Q Did Platte River have access during 2014  
21 to the server that housed Secretary Clinton's  
22 e-mails to her Clintonemail.com account?

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1 MR. BREWSTER: Objection. Form.  
2 Foundation.  
3 **A My understanding is they did in 2014.**  
4 Q And was there any discussion as to  
5 whether they could obtain Secretary Clinton's  
6 e-mails from that server from January 2009 to  
7 March 2009?  
8 MR. PEZZI: Objection. Beyond the scope.  
9 MR. BREWSTER: Objection. Beyond the  
10 scope.  
11 And to the extent that you can answer the  
12 question without divulging attorney-client  
13 privileged communications, you may answer.  
14 **A I did ask them, and they said they did  
15 not have any e-mails from that period.**  
16 Q Let me ask you, why did Secretary Clinton  
17 provide the e-mails in hard-copy form, rather than  
18 in their original electronic form to the State  
19 Department?  
20 MR. BREWSTER: To the extent you can  
21 answer that question without divulging  
22 attorney-client privilege, you may answer.

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1 **A Our understanding was that was the State  
2 Department's policy at the time.**  
3 Q And who told you that that was the State  
4 Department's policy at the time?  
5 MR. BREWSTER: Same objection.  
6 Q And this, the time frame is December of  
7 2014. Is that what you're referring to when you  
8 say "at the time"?  
9 **A So I -- I learned that in my capacity as  
10 her attorney. I did not have conversations with  
11 the State Department directly on this.**  
12 Q Did -- were there any discussions with  
13 State Department officials, either Richard Visek  
14 or anybody else at the State Department, with  
15 respect to the e-mails being provided to the State  
16 Department in their original format, the  
17 electronic form, as opposed to hard copies?  
18 MR. BREWSTER: Objection. Form.  
19 Foundation.  
20 **A I'm -- I'm trying to remember. There may  
21 have been subsequent conversations about that.  
22 But I was not involved in those conversations.**

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1 Q When you say "subsequent," subsequent to  
2 what?  
3 **A Subsequent to providing them in hard**  
4 **copy.**  
5 Q Okay. Do you recall when those  
6 conversations took place subsequent to December 5,  
7 2014?  
8 **A I do not. I was not involved in the**  
9 **conversations.**  
10 Q Who was involved in the --  
11 **A Or at least --**  
12 Q I'm sorry. Go ahead.  
13 **A Or at least I should say I don't recall**  
14 **being involved in the conversations. I want to be**  
15 **careful.**  
16 Q Sure. I appreciate that.  
17 And who was involved in those  
18 conversations with State Department officials?  
19 MR. PEZZI: Objection. Form.  
20 MR. BREWSTER: Same objection.  
21 **A I believe it was David Kendall, but I'm**  
22 **not certain.**

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1 Q Prior to December 5, 2014, did -- if  
2 you're aware of, did the State Department request  
3 that Secretary Clinton provide copies of her  
4 e-mails in the original electronic format, rather  
5 than paper copies?  
6 MR. BREWSTER: Objection. Form.  
7 Foundation. Asked and answered.  
8 **A I'm not aware of any request prior to**  
9 **that.**  
10 Q Earlier I believe you testified that you  
11 did consult on occasion with Philip Reines with  
12 respect to determining whether e-mails were  
13 personal or business related.  
14 Was there anybody else that you consulted  
15 with on this topic?  
16 MR. BREWSTER: Objection. Form.  
17 Mischaracterizes past testimony.  
18 **A I consulted with David Kendall. I**  
19 **consulted with Cheryl Mills. I may have consulted**  
20 **with other attorneys at Williams & Connolly, but I**  
21 **don't recall.**  
22 Q And I -- I should have clarified. Other

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1 than Ms. Mills and David Kendall, did you -- and  
2 outside of anybody at Williams & Connolly, did you  
3 consult with anybody else when determining whether  
4 records were personal or State related?  
5 **A I may have consulted with other aides of**  
6 **Secretary Clinton.**  
7 Q And who were those aides?  
8 **A I remember calling Jake, but I -- Jake**  
9 **Sullivan, but I don't recall whether we actually**  
10 **did end up consulting him.**  
11 Q Do you recall contacting anybody else who  
12 served for Secretary Clinton during her tenure?  
13 **A I may have contacted Huma Abedin**  
14 **regarding particular names, but I don't recall.**  
15 Q Anybody else who served under Secretary  
16 Clinton?  
17 **A Not that I can think of, no.**  
18 Q And just for the record, you referred to  
19 Jake Sullivan. That's Jacob Sullivan?  
20 **A Correct.**  
21 Q Why did you consult with Mr. Reines as to  
22 whether e-mails were personal in nature or state

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1 related?  
2 MR. BREWSTER: Objection. Potentially  
3 calls for privileged information.  
4 If you can answer without divulging  
5 attorney work product or attorney-client  
6 privilege, you may answer.  
7 **A So he, like the others that I mentioned,**  
8 **were in much more close contact with Secretary**  
9 **Clinton while she was Secretary than I was.**  
10 **They would have greater familiarity with**  
11 **some individuals or some -- be able to provide**  
12 **greater context to some of the e-mails.**  
13 Q There was also discussion during your  
14 interview with the FBI about determination as to  
15 whether any e-mails were duplicates, and how you  
16 reviewed those or processed those.  
17 Do -- do you recall that conversation?  
18 MR. BREWSTER: Objection. Form.  
19 Foundation.  
20 **A I know it is somewhere in this document,**  
21 **I'm just looking for it.**  
22 Q Well, let me ask you: Do you recall,

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1 sitting here today, how you, during your review  
 2 process, how you determined if e-mails were  
 3 duplicates and what you did with them?  
 4 **A My recollection is I did not have a**  
 5 **consistent process to determine that. But if in**  
 6 **my review I saw that there were two e-mails that**  
 7 **were identical to each other, I would de-dupe**  
 8 **them.**  
 9 Q What do you mean by "de-dupe them"?  
 10 **A Oh, I'm sorry. I would remove one of**  
 11 **them.**  
 12 Q Okay. I'm sorry. Just give me one  
 13 moment. Okay.  
 14 And moving forward to January of 2015.  
 15 At some point you or somebody from Platte River  
 16 Networks, there was a deletion of e-mails on your  
 17 laptop. Is that right?  
 18 **A Can you -- can you say that question**  
 19 **again?**  
 20 Q Yeah. At some point was there a deletion  
 21 of Secretary Clinton's e-mails in 2015 by Platte  
 22 River?

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1 MR. BREWSTER: Objection. Form.  
 2 Foundation.  
 3 **A From my laptop?**  
 4 Q From your laptop, we can start with that.  
 5 **A Yes.**  
 6 Q Okay. And I'll just refer you to your  
 7 FBI 302. I believe it's on Page 5 of your  
 8 interview.  
 9 And it just says -- I'll point you where  
 10 it says, "In January of 2015 Samuelson asked  
 11 somebody to remove exported e-mail files that had  
 12 been previously provided to her by PRN."  
 13 Do you see that?  
 14 **A I do.**  
 15 Q Okay. Why did you make that request of  
 16 PRN?  
 17 **A Because I no longer wanted to have her**  
 18 **e-mails on my laptop.**  
 19 Q Okay. And at that point what were the  
 20 e-mails that were deleted, the 30,490 e-mails or  
 21 the 62,000-and-some e-mails?  
 22 **A It was the 62,000-and-some e-mails.**

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1 **Well, actually, let me back that up. It**  
 2 **was probably was -- it was both. Because they**  
 3 **came in two tranches. So it would have been both**  
 4 **the 30,000 -- I'm sorry, the .gov e-mails that**  
 5 **were sent, the to and from state.gov, or just**  
 6 **.gov, and then also the -- the larger file that**  
 7 **was sent later.**  
 8 Q Okay. In the second export?  
 9 **A Correct, the second export.**  
 10 Q Okay. Did anybody scrub your laptop as a  
 11 result of your request to delete Secretary  
 12 Clinton's e-mails from your laptop?  
 13 MR. BREWSTER: Objection. Form.  
 14 **A What do you mean by "scrub"?**  
 15 Q Use any forensic tools available to  
 16 delete and make sure that the information is not  
 17 recoverable.  
 18 **A My understanding is Platte River did use**  
 19 **some type of tool. I couldn't tell you what that**  
 20 **was.**  
 21 Q Did you request that they use that tool  
 22 to delete the e-mails on your laptop?

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1 **A I did not request a specific tool, no.**  
 2 Q Okay. Are you aware of a conference call  
 3 that was held by David Kendall and Cheryl Mills  
 4 and Platte River Networks in March of 2015?  
 5 **A Sorry, I'm just trying to remember.**  
 6 Q And I'll give you the exact date. March  
 7 25 of 2015.  
 8 **A Apologies. It's just been a long time.**  
 9 **I don't recall if I was on that conference call or**  
 10 **not.**  
 11 Q Okay. But you are aware of a conference  
 12 call that was held in or around March 25, 2015,  
 13 with Platte River Networks?  
 14 **A Sorry. I'm just looking at this because**  
 15 **this was closer in time. This is -- this was**  
 16 **closer in time to when that call would have taken**  
 17 **place.**  
 18 **I don't recall whether or not I was on**  
 19 **the call.**  
 20 Q Okay. And do you know whether there were  
 21 any discussions on the call about deleting any  
 22 backups to Secretary Clinton's e-mails?

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1 MR. BREWSTER: Objection. Form.  
 2 Foundation.  
 3 **A I don't believe I was on the call. But**  
 4 **my recollection of what you're referring to was**  
 5 **Mr. Kendall just making sure Platte River was**  
 6 **aware of their preservation requirements.**  
 7 Q And how do you know that?  
 8 MR. BREWSTER: Objection. Potentially  
 9 calls for privileged information.  
 10 If you can answer that question without  
 11 divulging attorney-client privilege, you may  
 12 answer.  
 13 **A It's in my capacity as her attorney.**  
 14 Q And were you aware in March of 31, 2015,  
 15 of manual deletions that were made of backup  
 16 servers for Secretary Clinton's e-mails?  
 17 MR. BREWSTER: Objection. Form.  
 18 Foundation.  
 19 **A No.**  
 20 Q Do you know why Platte River Networks  
 21 deleted any backups to Secretary Clinton --  
 22 Clinton's e-mails in -- on March 31st, 2015?

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1 MR. BREWSTER: Objection. Form.  
 2 Foundation.  
 3 **A I do not.**  
 4 Q Did Secretary Clinton request Platte  
 5 River Network to delete backups of her e-mails in  
 6 March of 2015?  
 7 MR. BREWSTER: Form. Foundation.  
 8 **A She did not.**  
 9 Q Okay. Did Secretary Clinton make a  
 10 request to keep all of her e-mails after the  
 11 review process was complete?  
 12 MR. BREWSTER: Objection. Potentially  
 13 calls for privileged information.  
 14 If you can answer that question without  
 15 divulging attorney-client privilege, you may  
 16 answer.  
 17 **A As she has said publicly, she did not.**  
 18 **If I'm understanding your --**  
 19 Q She did not?  
 20 **A Could you repeat? Could you repeat your**  
 21 **question? I want to make sure I'm understanding**  
 22 **it correctly.**

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1 Q Did Secretary Clinton request that her  
 2 e-mails be retained after the review process is  
 3 complete?  
 4 **A Are you talking about in December 2014,**  
 5 **January 2015?**  
 6 Q Around that time frame, yes. After  
 7 the -- so leading up to December of 2014, shortly  
 8 after the e-mails, the 30-some-thousand e-mails  
 9 were produced to the State Department, did  
 10 Secretary Clinton make a request that all of her  
 11 e-mails should be retained?  
 12 **A No, she did not.**  
 13 Q I want to refer you to the last full  
 14 paragraph on Page 5 of the FBI's 302 of your  
 15 interview. Where it begins with, "Samuelson  
 16 stated in May of 2015 she deleted some e-mails  
 17 from her copy of the work-related e-mails that  
 18 were previously provided to DOS. Samuelson  
 19 explained that she was notified by DOS prior to  
 20 the release of the first tranche of FOIA e-mails  
 21 that some of the work-related e-mails they had  
 22 turned over were classified."

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1 Do you see that?  
 2 **A I do.**  
 3 Q Okay. So just so I'm clear, did you  
 4 retain a copy of Secretary Clinton's e-mails that  
 5 were produced to the State Department after  
 6 January of 2015?  
 7 MR. BREWSTER: Objection. Form.  
 8 Foundation.  
 9 **A I did.**  
 10 Q Okay. Were you surprised to learn that  
 11 Secretary Clinton had retained e-mails that were  
 12 deemed classified by the State Department?  
 13 MR. BREWSTER: Objection. Form.  
 14 Foundation.  
 15 MR. PEZZI: Same objection. And beyond  
 16 the scope.  
 17 **A I was not aware these e-mails were**  
 18 **deemed -- so my understanding is that the e-mails**  
 19 **were retroactively classified by the department.**  
 20 Q Who told you that they were retroactively  
 21 classified by the department as classified?  
 22 **A My understanding is that when they were**

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1 reviewed for release under FOIA, that they were --  
 2 and retroactive classification may be the wrong  
 3 term. I've heard it described a couple of ways.  
 4 But that they were upgraded to classified  
 5 at that time, when they were released under FOIA.  
 6 Q Who told you that those e-mails were  
 7 upgraded when they were released under FOIA to  
 8 being classified?  
 9 MR. PEZZI: Objection. Beyond the scope.  
 10 MR. BREWSTER: Same objection.  
 11 A My understanding is that we were informed  
 12 by that by Under Secretary Kennedy, so that we  
 13 could make sure when an e-mail was upclassified,  
 14 upgraded or retroactively classified or whatever  
 15 the appropriate term is, prior to release under  
 16 FOIA, that we were able to delete it from our  
 17 records so we were not retaining that material.  
 18 Q Were you made aware during this time  
 19 frame in May of 2015 that there were e-mails  
 20 within the set of e-mails that Secretary Clinton  
 21 retained that were deemed classified when they  
 22 were originally created?

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1 A No.  
 2 MR. PEZZI: Objection. Beyond the scope.  
 3 MR. BREWSTER: Same objection.  
 4 A Can you ask the question again?  
 5 MS. COTCA: Can you read it back.  
 6 (Pending question read.)  
 7 MR. BREWSTER: Same objection. Also  
 8 form.  
 9 A No, my understanding at this time was  
 10 that they were e-mails that were being upgraded to  
 11 classified and being -- for the FOIA release  
 12 process.  
 13 Q Okay. Are you aware as we sit here today  
 14 that there were e-mails within Secretary Clinton's  
 15 set of e-mails that she retained that were  
 16 classified and deemed classified at the time that  
 17 the e-mails were created?  
 18 MR. BREWSTER: Objection. Beyond the  
 19 scope. Form.  
 20 MR. PEZZI: Same objections.  
 21 A There were no classification markings on  
 22 any of her -- on her e-mails.

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1 Q I understand. But my question is yes or  
 2 no.  
 3 A So I know that -- I believe that as part  
 4 of the FBI review, they determined that there were  
 5 a small number of e-mails, I couldn't -- I  
 6 couldn't tell you the exact number, sitting here  
 7 today. But a small number of e-mails that they  
 8 believed in their review process to have been  
 9 classified at the time that she sent them. Or  
 10 received them, I should say. Received them.  
 11 Q Okay. Were you surprised to learn of  
 12 that?  
 13 MR. BREWSTER: Objection. Form.  
 14 Foundation.  
 15 A Was I surprised by the FBI's statement?  
 16 Q No. Were you surprised that Secretary  
 17 Clinton retained e-mails upon her leaving the  
 18 State Department that were classified at the time  
 19 that she either received or sent them during her  
 20 tenure at the State Department?  
 21 A Yes, in that I had no reason to believe  
 22 that they were classified.

244

1 Q Was Secretary Clinton aware in late 2014  
 2 or early 2015 that State Department had pending  
 3 FOIA lawsuits pertaining to her e-mails in regards  
 4 to the Benghazi attacks?  
 5 MR. BREWSTER: Objection. Form.  
 6 Foundation.  
 7 A I don't know of her awareness.  
 8 Q Were you made aware of any pending  
 9 lawsuits by the State Department during this time  
 10 frame with respect to FOIA lawsuits pertaining to  
 11 the Benghazi attacks?  
 12 MR. BREWSTER: Objection.  
 13 MR. PEZZI: Objection.  
 14 MR. BREWSTER: Form. Foundation.  
 15 MR. PEZZI: Same objections.  
 16 A I was not aware of pending lawsuits  
 17 related to -- related -- I believe related to this  
 18 case.  
 19 Q Okay. Were you aware that Secretary  
 20 Clinton -- or let me rephrase that.  
 21 Were you aware that there is -- were  
 22 pending requests and congressional subpoenas to

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1 Secretary Clinton for records relating to Benghazi  
2 from the Benghazi Select Committee in 2014 and  
3 early 2015?  
4 MR. BREWSTER: Objection. Form.  
5 Foundation. Outside the scope.  
6 MR. PEZZI: Objection, form. Objection,  
7 foundation.  
8 **A No, I am not aware that there was a**  
9 **subpoena.**  
10 Q Are you aware that there were  
11 congressional requests from the Benghazi Select  
12 Committee for records from Secretary Clinton  
13 related to the Benghazi attacks in December of  
14 2014?  
15 MR. BREWSTER: Same objections.  
16 **A I knew that there was a Benghazi Select**  
17 **Committee. I don't know what my awareness was in**  
18 **terms of their requests at this time.**  
19 Q I'll just refer you to what's been marked  
20 as Exhibit 13. You can take a look at that.  
21 MR. BREWSTER: That's the one you don't  
22 have many copies of?

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1 MS. COTCA: Yeah. That's the letter from  
2 David Kendall to --  
3 MR. BREWSTER: Can I see that.  
4 MS. COTCA: -- Congressman Trey Gowdy.  
5 Q And I'll just refer you to the first full  
6 paragraph on the second page. Where it begins,  
7 "On December 5, 2014, in response to an October  
8 28, 2014, letter request from the Department of  
9 State for assistance in ensuring its records are  
10 as complete as possible" -- that's not the one I'm  
11 looking for.  
12 Actually, I'm looking for -- I'll  
13 actually point you to the third page --  
14 **A Okay.**  
15 Q -- of that exhibit.  
16 The second full paragraph. Where it  
17 begins with, "As you know, in my December 29,  
18 2014, response letter I referred that request to  
19 the State Department for production of any  
20 responsive e-mails from the set of 30,490  
21 work-related and potentially work-related e-mails  
22 from the hdr22@clintonemail.com account."

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1 Do you see that?  
2 **A I do.**  
3 Q Okay. Do you know what request  
4 Mr. Kendall is referring to in that paragraph?  
5 MR. BREWSTER: Objection. Form.  
6 Foundation.  
7 MR. PEZZI: Same objections. And beyond  
8 the scope.  
9 **A Well, sorry. I'm just reading the**  
10 **paragraph before it, which I think explains what**  
11 **he's referring to.**  
12 Q Okay.  
13 **A I may have been aware of this at the time**  
14 **in my capacity as her attorney.**  
15 Q Then do you know why Secretary Clinton's  
16 e-mails were deleted and backups of her e-mails  
17 were deleted in March of 2015?  
18 MR. BREWSTER: Objection. Form.  
19 Foundation. Asked and answered.  
20 Q Let me rephrase it.  
21 Do you know why Secretary Clinton's  
22 e-mails were deleted in March of 2015, while the

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1 pending request from the Benghazi Select Committee  
2 discussed in Mr. Kendall's letter were still  
3 outstanding?  
4 MR. BREWSTER: Same objections.  
5 **A My understanding -- and I learned this**  
6 **later on in my representation of her, and in**  
7 **following the news -- is that --**  
8 MR. STEKLOFF: Just you shouldn't say  
9 about what you learned from your representation.  
10 But it's fine to say what you learned in the news.  
11 MS. COTCA: Well, do you want to --  
12 THE WITNESS: Sorry. Let me --  
13 MR. STEKLOFF: She can't talk -- she  
14 can't -- if it's something she learned after the  
15 fact through privilege, I'm just -- need to  
16 caution her.  
17 But if you learned something through the  
18 news, you are more than welcome to share it. If  
19 you need to.  
20 MR. BREWSTER: Do you want to have a  
21 discussion?  
22 **A So my understanding is that was conducted**

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**1 by Platte River. I can't speak to what their**  
**2 thought process is, was at that time. It was not**  
**3 something that her attorneys requested.**  
4 Q What efforts were undertaken by either  
5 you, Ms. Mills, or Mr. Kendall to ensure that  
6 Platte River retained a complete set of Secretary  
7 Clinton's e-mails while these pending requests  
8 were still outstanding from the Benghazi Select  
9 Committee?  
10 MR. BREWSTER: Objection. Form.  
11 Foundation. Well beyond the scope.  
**12 A So, again, are we talking about March**  
**13 2015?**  
14 Q Yes.  
**15 A Or when -- okay.**  
**16 So my understanding is there was --**  
**17 the -- the conference call you referred to**  
**18 earlier, maybe another call in which David --**  
**19 Mr. Kendall informed Platte River of their**  
**20 preservation requirements pursuant to the**  
**21 subpoena.**  
22 Q As an attorney, are you aware of your

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1 obligation that -- your obligation and that of  
2 your client not to destroy documents or evidence  
3 while subpoenas are pending, or during pending  
4 litigations?  
5 MR. BREWSTER: Object.  
**6 A I am.**  
7 MR. BREWSTER: That's fine.  
8 MS. COTCA: You made your objection?  
9 MR. BREWSTER: Yes.  
10 Q Okay. And your answer is?  
**11 A I am.**  
12 MR. STEKLOFF: Can I just ask how much  
13 longer you have?  
14 MS. COTCA: I think this is a good time  
15 to break for me to look at any things I need to  
16 clean up.  
17 MR. STEKLOFF: Okay.  
18 MR. BREWSTER: Okay.  
19 VIDEO SPECIALIST: We are going off the  
20 record at 16:55.  
21 (A recess was taken.)  
22 VIDEO SPECIALIST: We are back on the

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1 record at 17:05.  
2 BY MS. COTCA:  
3 Q Ms. Samuelson, I want to show you what's  
4 been marked as an exhibit in a different FOIA --  
5 in a different deposition, in this, in the  
6 discovery in this case. Let me show it to your  
7 attorney.  
8 I just want -- it's, for the record, it's  
9 Finney Exhibit 2.  
10 (Finney Exhibit 2, previously marked,  
11 retained by counsel.)  
12 MR. BREWSTER: This is, I take it, your  
13 only copy?  
14 MS. COTCA: Yes.  
15 MS. COPE-KASTEN: Are you marking it as  
16 an exhibit to this deposition?  
17 MS. COTCA: I am not. I'm just referring  
18 to it as Finney Exhibit 2. Sorry, Steve.  
19 MR. BREWSTER: Okay.  
20 MS. COTCA: If you can just let DOJ  
21 counsel take a look.  
22 MR. BREWSTER: Okay.

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1 Q Ms. Samuelson --  
**2 A Do I get to look, too?**  
3 Q You do. You don't need to read it line  
4 by line. But I'll represent to you that it's a  
5 set of notices that were sent to the seventh floor  
6 in 2009 through 2012, I believe, on the exhibit,  
7 with respect to workshops that were provided to  
8 principals and offices and the seventh floor with  
9 respect to document retention.  
10 Is that a fair representation of what you  
11 see before you?  
**12 A It is.**  
13 Q Okay. Do you recall receiving any such  
14 notices with respect to workshops that were  
15 provided during your tenure at the State  
16 Department?  
17 MR. BREWSTER: Objection. Form.  
**18 A I do not recall receiving these, nor do**  
**19 they appear they would have -- I'm not list -- my**  
**20 office is not listed in the memorandum to line.**  
21 Q Oh, what is the memorandum --  
**22 A It's memorandum to the Offices of the**



Conducted on June 13, 2019

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**1 Deputy Secretaries all Under Secretaries, the**  
**2 counselor, the special envoys, and the special**  
**3 representatives.**  
 4 Q So is Patrick Kennedy's office, the Under  
 5 Secretary for Management, not included?  
**6 A Oh, he is an Under Secretary. I'm just**  
**7 saying my personal, my office, the White House**  
**8 liaison's office was not listed there.**  
 9 Q But wasn't your office under -- under  
 10 Patrick Kennedy's office?  
**11 A It was.**  
 12 Q Okay. Do you recall any such workshops  
 13 during your time at the State Department?  
**14 A I --**  
 15 MR. BREWSTER: Objection. Form.  
**16 A I do not.**  
 17 Q Okay. Going back to the names of  
 18 individuals who you used to search during the  
 19 sorting process of Secretary Clinton's e-mails. I  
 20 have asked you about a list, and I'm not asking  
 21 about a list.  
 22 But I just want to name specific

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1 individuals to see if you used those individuals  
 2 to search for Secretary Clinton's e-mails.  
 3 Huma Abedin, Jacob Sullivan, Cheryl  
 4 Mills, and Philip Reines?  
 5 MR. BREWSTER: Objection. Form. Do you  
 6 maybe want to do that one at a time?  
 7 MS. COTCA: Well, then I'll have more  
 8 questions than three.  
 9 MR. BREWSTER: I understand.  
 10 Q Sure. Did you search for Huma Abedin  
 11 when you applied the name search to Secretary  
 12 Clinton's e-mails during the review process in  
 13 September of 2014?  
**14 A Yes.**  
 15 Q Okay. Did you search for Jacob Sullivan  
 16 when you applied the name search for the review  
 17 process of Secretary Clinton's e-mails in  
 18 September of 2014?  
**19 A Yes.**  
 20 Q Okay. And the same question for Cheryl  
 21 Mills?  
**22 A Yes.**

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1 Q And the same question for Phillip Reines?  
**2 A Yes.**  
 3 Q And prior to your interview with the FBI,  
 4 were you provided immunity by the FBI?  
 5 MR. BREWSTER: Objection. Form.  
 6 Foundation. Beyond the scope.  
 7 MR. PEZZI: Same objections.  
**8 A I was not provided immunity prior to my**  
**9 interview.**  
 10 Q Okay. Were you provided immunity by the  
 11 FBI?  
 12 MR. BREWSTER: Same objections.  
 13 MR. PEZZI: Same objections.  
**14 A I was not provided immunity by the FBI.**  
**15 I was provided limited production immunity by the**  
**16 Department of Justice.**  
 17 Q And when was that?  
 18 MR. BREWSTER: Same objections.  
 19 MR. PEZZI: Same objections.  
**20 A My recollection, it was June 2015.**  
 21 MS. COTCA: I have no further questions.  
 22 MR. BREWSTER: All right.

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1 THE WITNESS: Oh.  
 2 MR. BREWSTER: We'll be very brief.  
 3 EXAMINATION BY COUNSEL FOR THE WITNESS  
 4 BY MR. BREWSTER:  
 5 Q Good afternoon, Ms. Samuelson.  
**6 A Good afternoon.**  
 7 Q I just have a few questions. It's been a  
 8 long day, so I'll be very brief.  
 9 Do you recall early in the deposition  
 10 today you were asked some questions about your  
 11 practice of using e-mail, both work and personal,  
 12 while you were at the Department of State?  
**13 A Yes.**  
 14 Q What was your practice with regard to the  
 15 use of e-mail while you were at the Department of  
 16 State?  
**17 A My practice was to use my state.gov**  
**18 account.**  
 19 Q Did you ever use a personal e-mail  
 20 account when you were at the State Department?  
**21 A My practice was to use my state.gov. I**  
**22 may have sent on occasion e-mails from my Gmail**

<p style="text-align: right;">257</p> <p><b>1 account. But my practice was to use my state.gov.</b></p> <p>2 Q Can I direct your attention to what</p> <p>3 plaintiff's counsel marked as Exhibit 14, which is</p> <p>4 your FBI 302.</p> <p>5 And could I look -- have you look at Page</p> <p>6 4, under a subsection that says, Cul and Review of</p> <p>7 E-mails. The second paragraph down, the last</p> <p>8 sentence. And I'll read that to you. "Lastly,</p> <p>9 she," meaning Ms. Samuelson, "searched the</p> <p>10 remaining e-mails for keywords that included terms</p> <p>11 such as 'Afghanistan,' 'Libya,' and 'Benghazi.'"</p> <p>12 Do you see that?</p> <p><b>13 A I do.</b></p> <p>14 Q And you were asked earlier questions</p> <p>15 about the keyword searches that you performed as</p> <p>16 the third step in your review process.</p> <p>17 Do you recall that?</p> <p><b>18 A I do recall.</b></p> <p>19 Q Beyond those that were listed in your</p> <p>20 302, the keyword searches that were listed in your</p> <p>21 302 and those that you articulated in your</p> <p>22 testimony, do you recall any other keyword</p>	<p style="text-align: right;">259</p> <p>1 MR. BREWSTER: No further questions.</p> <p>2 MS. COTCA: That's it.</p> <p>3 MR. PEZZI: And no questions from the</p> <p>4 government.</p> <p>5 VIDEO SPECIALIST: If there are no</p> <p>6 further questions, then this ends the deposition</p> <p>7 and we are going off the record at 17:12.</p> <p>8 (Off the record at 5:12 p.m.)</p> <p>9</p> <p>10</p> <p>11</p> <p>12</p> <p>13</p> <p>14</p> <p>15</p> <p>16</p> <p>17</p> <p>18</p> <p>19</p> <p>20</p> <p>21</p> <p>22</p>
<p style="text-align: right;">258</p> <p>1 searches that you performed?</p> <p><b>2 A I recall that I also searched for</b></p> <p><b>3 Tripoli. I recall that I also searched for</b></p> <p><b>4 Libyans. I don't recall other search terms,</b></p> <p><b>5 sitting here today.</b></p> <p>6 Q Would there be anywhere that you could go</p> <p>7 to -- beyond what is listed in your 302 and your</p> <p>8 testimony today, to determine what search terms</p> <p>9 you used in the third step of your review?</p> <p><b>10 A No.</b></p> <p>11 Q And does that include the after-action</p> <p>12 memo?</p> <p><b>13 A Yes.</b></p> <p>14 Q Do you have any evidence or personal</p> <p>15 knowledge that Secretary Clinton used her personal</p> <p>16 e-mail address to evade FOIA?</p> <p>17 MS. COTCA: Objection.</p> <p><b>18 A No.</b></p> <p>19 Q Do you have any personal knowledge of the</p> <p>20 Department of State's efforts to settle this case</p> <p>21 in late 2014 and early 2015?</p> <p><b>22 A No.</b></p>	<p style="text-align: right;">260</p> <p>1 ACKNOWLEDGMENT OF DEPONENT</p> <p>2 I, HEATHER SAMUELSON, do hereby</p> <p>3 acknowledge that I have read and examined the</p> <p>4 foregoing testimony, and the same is a true,</p> <p>5 correct and complete transcription of the</p> <p>6 testimony given by me, and any corrections appear</p> <p>7 on the attached Errata sheet signed by me.</p> <p>8</p> <p>9 _____</p> <p>10 (DATE) (SIGNATURE)</p> <p>11</p> <p>12</p> <p>13</p> <p>14</p> <p>15</p> <p>16</p> <p>17</p> <p>18</p> <p>19</p> <p>20</p> <p>21</p> <p>22</p>

Transcript of Heather Samuelson  
Conducted on June 13, 2019

1 CERTIFICATE OF SHORTHAND REPORTER - NOTARY PUBLIC

2 I, Debra Ann Whitehead, the officer before whom

3 the foregoing deposition was taken, do hereby

4 certify that the foregoing transcript is a true and

5 correct record of the testimony given; that said

6 testimony was taken by me stenographically and

7 thereafter reduced to typewriting under my

8 direction; that reading and signing was requested;

9 and that I am neither counsel for, related to, nor

10 employed by any of the parties to this case and have

11 no interest, financial or otherwise, in its outcome.

12 IN WITNESS WHEREOF, I have hereunto set my hand and

13 affixed my notarial seal this 13th day of June,

14 2019.

15

16 My commission expires:

17 September 14, 2023

18



19 \_\_\_\_\_

20 NOTARY PUBLIC IN AND FOR THE

21 DISTRICT OF COLUMBIA

22

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No. 230029

Re: Deposition of **Heather Samuelson**

Date: 6/13/2019

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

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Page	Line	Correction/Change and Reason
161	1	"on her personal" should read "the person's"
288	20	"2015" should read "2016"

6/21/19  
(Date)

Heather Samuelson  
(Signature)

No. 230029

Re: Deposition of **Heather Samuelson**

Date: 6/13/2019

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

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ACKNOWLEDGMENT OF DEPONENT

I, Heather Samuelson, do hereby acknowledge that I have read and examined the foregoing testimony, and the same is a true, correct and complete transcription of the testimony given by me and any corrections appear on the attached Errata sheet signed by me.

6/21/19

(Date)

Heather Samuelson

(Signature)