Page 1	Page 3
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UNITED STATES DISTRICT COURT FOR THE DISTRICT OF NEW JERSEY CIVIL ACTION NO. 2106 pt. 01051 DMC ME	2 June 8, 2009 3 10:18 a.m.
Defendants. RICK ROSS, Counterclaim-Plaintiff, v. KEITH RANIERE, NANCY SALZMAN, KRISTIN KEEFFE, INTERFOR, INC., JUVAL AVIV, ANNA MOODY, JANE DOE and JOHN DOES 1-10, Counterclaim-Defendants. INTERFOR, INC., JUVAL AVIV and ANNA MOODY, Cross-Claimants, -against- NXIVM Corporation, KEITH RANIERE, NANCY SALZMAN and KRISTIN KEEFFE,	Day I Deposition of NANCY SALZMAN, held at the offices of Tompkins McGuire, 100 Mulberry Street, Newark, New Jersey, pursuant to Notice, before Jomanna DeRosa, a Certified Shorthand Reporter and Notary Public of the State of New York. Public of the State of New York.
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DAY I DEPOSITION OF NANCY SALZMAN Newark, New Jersey Monday, June 8, 2009 Reported by: JOMANNA DEROSA, CSR JOB NO. 23146 Reported by: 10 11 12 13 14 15 16 17 18 19 20 21 22 23 24 25	1 APPEARANCES: 3 RIKER, DANZIG, SCHERER, HYLAND & PERRETTI, LLP 4 Attorneys for Morris Sutton, Rochelle Sutton, Stephanie Franco 5 Headquarters Plaza One Speedwell Avenue 6 Morristown, New Jersey 07962-1981 BY: HAROLD L. KOFMAN, ESQ. 7 LOWENSTEIN SANDLER, PC 8 Attorneys for The Ross Institute, Rick Ross, Paul Martin 9 and Wellspring Retreat, Inc. 65 Livingston Avenue 10 Roseland, New Jersey 07068 BY: PETER L. SKOLNIK, ESQ. 11 THOMAS S. DOLAN, ESQ. 12 DRINKER, BIDDLE & REATH, LLP Attorneys for Keith Raniere 13 S00 Campus Drive Florham Park, New Jersey 07932-1047 14 BY: ROBERT M. LEONARD, ESQ. 15 FRIEDMAN, KAPLAN, SEILER & ADELMAN Attorneys for Interfor, Inc., Juval Aviv and Anna Moody 1633 Broadway 17 New York, New York 10019-6708 BY: ROBERT S. LANDY, ESQ. 18 18 TOMPKINS MCGUIRE WACHENFELD & BARRY 19 Attorneys for the Witness, Nancy Salzman Four Gateway Center 100 Mulberry Street, Suite 5 Newark, New Jersey 07102 21 BY: WILLIAM B. MCGUIRE, ESQ.

Page 5 Page 7 1 1 SALZMAN - DAY I 2 2 You may know what I'm asking when I get two-thirds 3 IT IS HEREBY STIPULATED AND AGREED, by 3 of the way through the question, but for the 4 and between the attorneys for the respective 4 purposes of the transcript, just allow me to 5 parties herein, that filing and sealing be 5 finish the question and then give your answer. 6 and the same are hereby waived. 6 Do you understand this? 7 IT IS FURTHER STIPULATED AND AGREED 7 A. Yes. 8 that all objections, except as to the form 8 Q. If you need to take a break, just of the question, shall be reserved to the 9 9 tell me. This is not a marathon or an endurance time of the trial. 10 10 contest. I just ask that if there's a question IT IS FURTHER STIPULATED AND AGREED 11 11 pending, answer that question, and then we can 12 that the within deposition may be sworn to 12 take a break. All right? 13 13 and signed before any officer authorized to Now, we are starting with what you 14 administer an oath, with the same force and 14 have in front of you that's been marked already as 15 effect as if signed and sworn to before the 15 Salzman Exhibit 1. Have you ever seen this 16 Court. 16 before? 17 17 MR. MC GUIRE: Bear with me a 18 18 second, Mr. Landy. 19 19 (Discussion off the record.) 20 20 (Exhibit Salzman 2 marked for 21 21 identification.) 22 22 Q. Now, we've marked Salzman 2, 23 23 Ms. Salzman, and I ask you to direct your 24 24 attention to what is Exhibit A to that letter. 25 25 And that would be the document that I'd like to Page 6 Page 8 SALZMAN - DAY I 1 1 SALZMAN - DAY I 2 2 (Exhibit Salzman 1 marked for know if you've seen before. 3 3 A. I believe my attorney showed me identification.) NANCY SALZMAN, called as a witness, 4 4 this. I believe so. 5 having been duly sworn by a Notary 5 Q. Do you understand that you're 6 Public, was examined and testified as 6 testifying here today both in your individual 7 follows: 7 capacity, as well as on behalf of NXIVM 8 **EXAMINATION BY** 8 Corporation? 9 9 A. Yes. MR. LANDY: 10 10 Q. Good morning, Ms. Salzman. My name Q. Do you understand in your capacity 11 11 is Robert Landy. I'm an attorney at Friedman as the representative of NXIVM in this deposition 12 Kaplan Seiler & Adelman, and I represent Interfor, 12 you're responsible to answer questions relating to 13 Incorporated and Juval Aviv. 13 the topics outlined in Exhibit A to Salzman 14 14 Before we get started today, I'm Exhibit 2? 15 just going to go over a few fairly simple ground 15 A. Yes. 16 rules for how a deposition proceeds. The first is 16 Q. Are you prepared to answer 17 17 when I ask you a question, you need to give me an questions concerning each of those three topics? 18 18 answer in words. Since this is being recorded by A. Yes. 19 a stenographer, nodding of the head, sounds like 19 Q. As you're testifying today in both 20 uh-huh, or uh-uh can't be transcribed into answers 20 your individual capacity, as well as your capacity 21 on the transcript. So, therefore, we need to 21 as a corporate representative, we're going to 22 22 understand your answers to be given in both speak. 23 Also, let's try to -- I'll do my 23 capacities, both as to your personal recollection 24 24 and on behalf of the company, unless you say best to not cut off your answers, and I would ask 25 25 the same courtesy with respect to my questions. otherwise. Does that make sense?

SALZMAN - DAY I A. Yes. A. Nancy Salzman. A. Nancy Salzman. C. Lars that always been your legal aname? A. Nancy Salzman. C. Lars that always been your legal aname? A. Since I was married 33 years ago. G. Could you please describe your deducational history for me, starting with after graduation from high school? A. I went to Union College, and I got an associate's degree there. And then I was a combined program with Mublienberg Hospital School of Nursing, and I got a professional nursing degree there as well. C. Anything else? A. Post-graduate courses that were not academic, nor that type of academic course, not a gedere course. C. Q. Could you give me a very brief or expert obtaining your nursing degree? A. I worked at Waterbury Hospital— St. Mary's Hospital in Waterbury, Connecticut for a year. And then I worked for myself doing A. I worked as a seminar leader. And then I started another company with soud in the started founder, its executive success programs at NXIVM, and the later I worked as a subsiness consultant. I worked as a seminar leader. And then I started founder, its executive success programs at NXIVM, and the later I worked as a somisma consolutant. I worked as a seminar leader. And then I started founder, its executive success programs at NXIVM, and the later I worked as a somisma conceptual founder, its executive success programs at NXIVM, and the later I worked as a somisma conceptual founder, its executive success programs at NXIVM, and then later I worked as a somisma conceptual founder, its executive success programs at NXIVM, but was the period profer of the company. I was the president of the compa		Page 9		Page 11
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	Page 21		Page 23
1	SALZMAN - DAY I	1	SALZMAN - DAY I
2	A. I believe it was January of 2005.	2	A. My attorneys, Nolan & Heller.
3	Q. During that time frame, October of	3	Justin Heller and Rich Weiner suggested that I
4	2003 to January of 2005, did Mr. O'Hara act on	4	hire Interfor.
5	NXIVM's behalf in any other role, other than	5	Q. And when was this?
6	attorney?	6	A. I believe it was right after I
7	A. And business consultant?	7	hired Joe O'Hara in 2003.
8	Q. Let's go into business consultant.	8	Q. Have you ever heard of Juval Aviv?
9	What did he do as a business consultant?	9	A. Yes, I have.
10	A. He gave me advice about the	10	Q. Who is Juval Aviv?
11	company. He interfaced with other consultants for	11	A. I believe Interfor is his company.
12	the company, and suggested who they he	12	Q. Did there come a time when NXIVM
13	suggested them, and then introduced me to them,	13	hired Interfor to perform an investigation?
14	and then oversaw them. And he also did that with	14	A. Yes.
15	attorneys, but I guess that's the attorney	15	Q. Let me back up. Strike that.
16	capacity.	16	When was that?
17	Q. During what time frame was he a	17	A. I believe it was through Nolan and
18	business consultant to NXIVM?	18	Heller at that same time.
19	A. I think he did both things at the	19	Q. Who made the ultimate decision to
20	same time.	20	hire Interfor?
21	Q. Are you familiar with a man by the	21	A. It was a decision that I made with
22	name of Rick Ross?	22	the attorneys.
23	A. I am.	23	Q. Was Keith Raniere involved?
24	Q. When was the first time you heard	24	A. I don't remember discussing it with
25	of Rick Ross?	25	him.
	Page 22		Page 24
1	SALZMAN - DAY I	1	SALZMAN - DAY I
2	A. 2002, I believe.	2	Q. Was Interfor the let me start
3	Q. And what did you learn about	3	again.
4	Mr. Ross in 2002?	4	What is your understanding of what
5	A. I received a phone call from	5	Interfor what the nature of Interfor's business
6	Michael Sutton, who was away on a family vacation,	6	is?
7	and during that time he called me and told me that	7	A. I believe they're corporate
8	he had met Mr. Ross, and who Mr. Ross was.	8	investigation corporate information gathering,
9	Q. Did he say anything else?	9	private investigator.
10	A. He said that Mr. Ross was doing a	10	Q. Was Interfor the only corporate
11	series of discussions with him that he didn't know	11	investigation or private investigation company
12	were going to happen on this family vacation, but	12	that NXIVM hired in the 2003, 2004, 2005 time
13	he wanted me to know.	13	frame?
14	Q. What were those discussions about?	14	A. I think so. I hired another
15	Let me rephrase the question.	15	company before I hired them. It may have been
16	What did Mr. Sutton tell you those	16	2003.
17	discussions were about?	17	Q. What was the name of the other
18	A. He told me that Mr. Ross was a cult	18	company?
19	deprogrammer, and that he was attempting to	19	A. I can't remember.
20	deprogram Michael.	20	Q. Ms. Salzman, I'm going to show you
21		21	a document mat has bleviously marked as NAIVIVI
	Q. Have you ever heard of Interfor,	21 22	a document that has previously marked as NXIVM Exhibit 15.
21	Q. Have you ever heard of Interfor, Incorporated?	22	Exhibit 15.
21 22	Q. Have you ever heard of Interfor, Incorporated? A. I have.	22 23	Exhibit 15. MR. LANDY: For the record, NXIVM
21 22 23	Q. Have you ever heard of Interfor, Incorporated?	22	Exhibit 15.

	Page 25		Page 27
1	SALZMAN - DAY I	1	SALZMAN - DAY I
2	Q. Ms. Salzman, NXIVM Exhibit 15	2	to make a representation to you concerning
3	appears to be a compilation of two documents, a	3	this document, because it's not a document I
4	faxed cover letter from Joseph O'Hara to Anna	4	would have expected you to see in the normal
5	Moody, and then an attached engagement letter.	5	course of your business.
6	I'm going to focus your attention	6	This is an internal document
7	on just the engagement letter portion of this.	7	produced by Interfor in this litigation, which
8	And my first question is whether you've seen it	8	reflects payments from a client that is
9	before.	9	identified as Client 653.
10	A. I have.	10	And I'll further make a
11	Q. When was the first time you saw it?	11	representation to you that Client 653 is
12	A. I saw it during this case. I don't	12	NXIVM.
13	remember if I saw it previous to the case.	13	MR. MC GUIRE: You're referring to
14	Q. I'm going to turn to the page	14	the 653-04?
15	marked Interfor 00113. It's the page with the	15	MR. LANDY: Here it appears as
16	signature lines. You'll see that there's a	16	653-04, 653-04/A. Internally, if it's 653,
17	signature above the line Joseph O'Hara.	17	that means NXIVM. I'm not making any
18	Do you recognize that signature?	18	representation as to what the figures after
19	A. Yes, I do.	19	the dash mean.
20	Q. Is that Mr. O'Hara's signature?	20	Q. Ms. Salzman, on the left-hand side
21	A. I believe it is.	21	of Salzman Exhibit 3 you'll see indications that
22	Q. Have you ever seen an unsigned copy	22	suggest a number of payments were made from Client
23	of this retainer letter?	23	653 to Interfor, Incorporated, the first one being
24	A. I don't know if I have.	24	a \$12,000 retainer.
25	Q. Were you asked to approve a \$12,000	25	With respect to the other payments
	Page 26		Page 28
1	SALZMAN - DAY I	1	SALZMAN - DAY I
2	retainer to Interfor on or about September 2nd,	2	SALZMAN - DAY I here, do you recall approving the payment of these
	retainer to Interfor on or about September 2nd, 2004?	2	SALZMAN - DAY I here, do you recall approving the payment of these amounts on or about the dates that are listed?
2 3 4	retainer to Interfor on or about September 2nd, 2004? A. I believe I was.	2 3 4	SALZMAN - DAY I here, do you recall approving the payment of these amounts on or about the dates that are listed? A. I think I do.
2	retainer to Interfor on or about September 2nd, 2004? A. I believe I was. Q. In your role as president, is it	2 3 4 5	SALZMAN - DAY I here, do you recall approving the payment of these amounts on or about the dates that are listed? A. I think I do. Q. Do you have any reason to believe
2 3 4 5 6	retainer to Interfor on or about September 2nd, 2004? A. I believe I was. Q. In your role as president, is it your job to approve payments to vendors or	2 3 4 5 6	SALZMAN - DAY I here, do you recall approving the payment of these amounts on or about the dates that are listed? A. I think I do. Q. Do you have any reason to believe that NXIVM did not pay any of the amounts listed
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1	Page 29		Page 31
	SALZMAN - DAY I	1	SALZMAN - DAY I
2	Ross and his relationship with my company.	2	A. She coordinated between Joe O'Hara,
3	Q. What did Mr. Aviv say concerning	3	and the attorneys, and Interfor.
4	Mr. Ross?	4	Q. Do you know who suggested that
5	A. I don't remember if it was in this	5	Interfor investigate Rick Ross?
6	meeting. It was a long time ago, and I had a	6	MR. MC GUIRE: Wasn't it asked and
7	couple of meetings with him. But I remember that	7	answered? Maybe I'm wrong. You can answer
8	he said that he had a prior relationship with Rick	8	that, Ms. Salzman.
9	Ross, and that he knew him. I remember that he	9	A. I don't know how it came about.
10	didn't think highly of Rick Ross, that he believed	10	Q. When you first learned of the Ross
11	that he could gather information that my attorneys	11	investigation, did you have an understanding of
12	wanted for the case.	12	what the scope of that investigation was to be?
13	Q. Do you mean concerning Mr. Ross?	13	MR. MC GUIRE: When she first
14	A. Yes.	14	learned about it?
15	Q. What information did he say he	15	MR. LANDY: When she first learned
16	could gather?	16	about it.
17	A. He said that he could find out what	17	A. No.
18	things Mr. Ross was saying about my company. He	18	Q. Did you ask anybody?
19	believed he could find out who had hired Ross and	19	A. When I started to receive
20	who was funding his effort.	20	information about it, it was more than I assumed
21	Q. Did there come a time when Interfor	21	it would be, and I wasn't quite sure why we were
22	began an investigation of Mr. Ross?	22	gathering that data or what the purpose of it was.
23	A. I believe there was a time.	23	Q. What information did you receive?
24	Q. And when was that?	24	A. Kristin Keeffe told me of a report
25	A. I think it was after we hired him	25	that was done, and it had information about his
	Page 30		Page 32
1	SALZMAN - DAY I	1	SALZMAN - DAY I
2	to investigate Kris Snyder, and her death, her	2	finances, and I wasn't sure why we needed that or
3	disappearance.	3	1
			what the purpose of even doing that was.
4	Q. Do you recall the year?	4	Q. Did you ever see that report?
5	A. 2004.	4 5	Q. Did you ever see that report?A. I've seen it now.
5 6	A. 2004.Q. When did you first learn that	4 5 6	Q. Did you ever see that report?A. I've seen it now.Q. When did Ms. Keeffe tell you about
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	Page 33		Page 35
1	SALZMAN - DAY I	1	SALZMAN - DAY I
2	concerning Mr. Ross' communications, to the extent	2	Q. Do you recall whether it was before
3	that they were reflected in the report?	3	or after you heard of the report from Ms. Keeffe?
4	A. I don't remember that, no.	4	A. I don't recall.
5	Q. After Ms. Keeffe discussed the	5	Q. Did you ever discuss the idea that
6	report with you, did you discuss it with anybody	6	Mr. Aviv would contact Mr. Ross with anybody?
7	else?	7	A. I don't think so.
8	A. I probably discussed it with Keith	8	Q. How did you learn about it?
9	Raniere.	9	A. I think it was in the reports. I
10	Q. Did you discuss it with Mr. Aviv?	10	would get reports from either Joe or Kristin,
11	A. No, I don't think I did. I	11	mostly Kristin, and I think it was just mentioned.
12	probably also discussed it with Joe O'Hara.	12	Q. You say it was in the reports.
13	Q. Have you ever spoken to a person of	13	Were these written reports?
14	the name of Anna Moody?	14	A. No. They were just reports. I had
15	A. When I went to meet Juval Aviv, I	15	weekly reports.
16	met Anna Moody the same day.	16	Q. Was it your understanding strike
17	Q. Did you ever discuss this report	17	that.
18	with Ms. Moody?	18	What did you hear in those reports
19	A. Not that I can remember.	19	concerning a contact between Mr. Aviv and
20	Q. Did you ever discuss this report	20	Mr. Ross?
21	with anybody that you understood to work at	21	A. I believe that Mr. Aviv believed
22	Interfor, Incorporated?	22	that he could find out what Mr. Ross was saying
23	A. Not that I remember.	23	about our company, and he was going to gather that
24	Q. You'll see that the report is dated	24	information.
25	November 23, 2004. Do you believe that your	25	Q. Did he say how he was going to
	Page 34		Page 36
1	SALZMAN - DAY I	1	SALZMAN - DAY I
2	conversation with Ms. Keeffe was in and around	2	gather that information?
3	that time frame?	3	A. I remember that he was going to
4	A. I do.	4	he asked me if he could use a member of my company
5	MR. LANDY: We may come back to it,	5	to gather that information, and I told him that I
6	but you can put it aside.	6	didn't think that that was a good idea.
7	Q. How many times in total did you	7	Q. Did there come a time when you
8	visit Interfor's offices?	8	understood strike that. We'll come back to it.
9	A. I'm not sure. I think maybe three,	9	Did there ever come a time that you
10	maybe two. Two or three. I'm sorry. It was a	10	learned that Mr. Ross claimed to be in possession
11	long time ago. I don't really remember.	11	of material of a very personal nature concerning
12	Q. Do you recall when the last time	12	Mr. Raniere?
13	was?	13	A. Yes.
14	A. No, I don't.	14	Q. What was the nature of the
15	Q. Do you know what year it was in?	15	material?
16	A. Well, if I look at the dates of	16	A. Photographs.
17	this I'll guess it was 2005.	17	Q. Was it only photographs? Was there
18	Q. Did there come a time when you	18	anything else?
19	learned that Juval Aviv would contact Rick Ross	19	A. I don't think so.
20	directly?	20	Q. When did you learn this?
21	A. Yes.	21	A. Kristin Keeffe told me that
22	Q. When did you learn that that would	22	Mr. Aviv told her that Ross claimed to have a
23 24	happen?	23 24	large library of photographs of Keith in a comprising situation.
2 4 25	A. I'm not sure exactly. Sometime	25	Q. Do you recall when this was?
75	while this was while he was working with us.	2.5	() DO VOII recall when this was /

	Page 37		Page 39
1	SALZMAN - DAY I	1	SALZMAN - DAY I
2	A. Sometime between 2004 and 2005.	2	Mr. Ross, or the meeting, was recorded?
3	Q. Did Mr. Ross' claims concern you?	3	A. I heard that it was recorded.
4	A. It concerned me that he was saying	4	Q. Did you ever hear the actual
5	that.	5	recording?
6	Q. Did you ever become aware of	6	A. I did not.
7	something that I've referred to in this litigation	7	Q. Okay. When did you first learn
8	as the sting or the sting operation?	8	that the meeting had been recorded?
9	A. Did I ever became aware of it?	9	A. I don't remember.
10	Q. Yes.	10	Q. Who did you learn it from?
11	A. I did.	11	A. I don't remember that either.
12	Q. What is your understanding of what	12	Q. Did you ever discuss the recording
13	"the sting" is?	13	with Kristin Keeffe?
14	A. I think the sting is that Mr. Aviv	14	A. The fact that it had been
15	was going to bring a deprogramming case to Rick	15	recorded or I remember discussing the meeting
16	Ross, and that through that process, he was going	16	with her. I don't know I don't remember
17	to find out what Mr. Ross did in deprogramming	17	discussing a recording of it.
18	people with respect to my company.	18	Q. Did you ever discuss the fact that
19	Q. Do you know whether that, in fact,	19	the meeting was recorded with Mr. Raniere?
20	happened?	20	A. I don't think so.
21	A. I know that he had an interview	21	Q. When you spoke to Mr. Raniere
22	with a person in his office who was not related to	22	concerning what went on at the meeting, how
23	my company, and gathered a bunch of information.	23	long did you have an understanding of how long
24	I read that it was an hour long interview.	24	after the actual meeting this was?
25	Q. Is it your understanding that	25	A. Wait, I'm thinking about it. She
	Page 38		Page 40
1	SALZMAN - DAY I	1	SALZMAN - DAY I
1 2	SALZMAN - DAY I Mr. Ross was at this interview?	1 2	SALZMAN - DAY I must have told me that it was recorded. I'm
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	Page 41		Page 43
1	SALZMAN - DAY I	1	SALZMAN - DAY I
2	you have an understanding of when Mr. Aviv's	2	it was an e-mail, rather than a letter last
3	meeting with Mr. Ross had taken place?	3	week, where we would abide by the same
4	A. I guess. I must have. She must	4	stipulation we had at the Raniere deposition.
5	have told me when it took place. I don't remember	5	I think I responded to Mr. Skolnik saying we
6	her when it taking place. I knew that it took	6	would.
7	place.	7	MR. SKOLNIK: You did.
8	Q. I'm trying to establish some form	8	MR. MC GUIRE: I want the record to
9	of a timeline here. So, do you recall whether it	9	reflect my continuing objection rather than
10	had taken place days ago, weeks ago, months ago?	10	have to object each time there's a
11	A. My recollection was he reported it	11	conversation between O'Hara and Ross. So,
12	to her shortly after it happened, and she reported	12	everybody understands that I'm observing my
13	it to me shortly after she got that report.	13	right to challenge that.
14	(Recess taken.)	14	MR. LANDY: You mean between O'Hara
15	Q. Ms. Salzman, I'm going to go back	15	and NXIVM?
16	and ask you a few more questions concerning the	16	MR. MC GUIRE: I beg your pardon.
17	document that's marked as NXIVM Exhibit 18, which	17	Between O'Hara and any reference to that. Is
18	is the status report.	18	that understood, so I don't have to object
19	I understand that you testified	19	each time?
20	earlier that you believe you discussed the report	20	MR. SKOLNIK: Understood.
21	with Mr. O'Hara. Is that correct?	21	MR. MC GUIRE: Or do you want me to
22	A. I believe I did.	22	object each time?
23	Q. Do you recall that conversation?	23	MR. LANDY: It's understood.
24	A. I had a few conversations with	24	MR. SKOLNIK: Understood.
25	Mr. O'Hara about Mr. Aviv's work.	25	MR. KOFMAN: That's fine.
	Page 42		Page 44
1	SALZMAN - DAY I	1	SALZMAN - DAY I
1 2	Q. Okay. What did you discuss in the	2	
3	-	3	MR. MC GUIRE: All right.
	first one well, let me rephrase that.	4	Q. You had also previously testified
4 5	Were any of the discussions you had with Mr. O'Hara concerning Mr. Aviv's	5	that you personally did not speak to anyone who
	e l	6	worked at Interfor concerning this report.
6 7	investigation of Rick Ross?	7	Is that correct?
	A. Yes.		A. I don't believe that I did.
8 9	Q. Okay. The first time you discussed	8 9	Q. Did anyone from NXIVM speak to
10	Mr. Aviv's investigation of Rick Ross with Mr. O'Hara, what did you discuss with him?	10	someone at Interfor concerning the report?
11	A. We went to Mr. Aviv to have him	11	MR. MC GUIRE: You mean to her
		12	knowledge?
12 13	investigate Kristin Snyder's disappearance and	13	A. To my knowledge? On The question is envene at NYIVM
14	possible death.	14	Q. The question is anyone at NXIVM.
15	As a result of that, the scope of		And this is directly on one of the topics.
16	what he was doing seemed to be expanding into an area that I hadn't originally anticipated, nor was	15 16	A. I imagine Kristin Keeffe did. And
17		17	I can say I'm pretty sure she did.
18	I feeling positive about it. So, that's what we discussed.		Q. Do you know what the content of
19		18 19	that conversation was? A. No.
20	Q. And what did Mr. O'Hara say?	20	
	A. He thought it was necessary and		Q. Have you ever heard of a company
21 22	important.	21 22	called Sitrick & Co.?
23	Q. Did you accept that advice?	23	A. Yes, I have.
24	A. Ultimately. MR. MC GUIRE: Let the record show	24	Q. Was Sitrick ever retained to
25	that Mr. Skolnik sent me an e-mail I think	25	perform work for NXIVM? A. They were.
	mat ivii. Okomik Scht inc an C-inali I tillik		A. They were.

	Page 45		Page 47
1	SALZMAN - DAY I	1	SALZMAN - DAY I
2	Q. All right. Okay. Do you recall	2	Q. Do you recall having any
3	when that happened?	3	discussions concerning the information in that
4	A. I believe it was after we and	4	paragraph with anybody at NXIVM?
5	during the time that we were working with	5	A. I can't remember.
6	Interfor.	6	MR. LANDY: Okay. Let's put that
7	Q. What was Sitrick retained to do?	7	aside.
8	A. Public relations.	8	Let us mark as Salzman Exhibit 4 a
9	Q. Was Sitrick retained to do public	9	three-page document bearing the somewhat
10	relations work in general or with respect to any	10	strange Bates Nos. Interfor 00168, Interfor
11	specific topics?	11	00168-A and Interfor 00169.
12	A. Public relations with respect to	12	(Exhibit Salzman 4 marked for
13	NXIVM and our public image.	13	identification.)
14	Q. Had Sitrick been retained as of	14	Q. Ms. Salzman, do you recognize
15	November 23, 2004?	15	Salzman Exhibit 4?
16	A. You know, I can't remember. I know	16	A. I do.
17	that he was hired at the same time that we were	17	Q. Okay. What is it?
18	working with Interfor. That's the best of my	18	A. It's an indemnity agreement between
19	recollection. I think we hired Interfor first,	19	Juval and my company; Juval Aviv.
20	but I'm not sure.	20	Q. On the last page of the exhibit
21	Q. Do you recall if anyone suggested	21	there is a signature over the line "Nancy
22	that NXIVM hire Sitrick & Company?	22	Salzman." Is that your signature?
23	A. I know that someone did. My memory	23	A. That is my signature.
24	was that it all happened around the same time.	24	Q. Okay. Do you recall signing this
25	And it may have been Juval Aviv.	25	agreement?
	Page 46		Page 48
1	SALZMAN - DAY I	1	SALZMAN - DAY I
2	Q. Was Sitrick asked to perform any	2	A. I do.
3	work concerning statements made by Rick Ross?	3	Q. And was that on November 23rd,
4	I've got a whole list. I'm going to break it down	4	2004?
5	to just Rick Ross.	5	A. I think it was.
6	A. My recollection about Sitrick is	6	Q. Back just to the front page of the
7	that they were going to improve our public image,	7	exhibit.
8	that somebody at Sitrick had a relationship with	8	A. Yes.
9	Forbes Magazine, and they were going to attempt to	9	Q. Is this a form of a fax cover sheet
10	get another article written that would improve our	10	that you use?
11	public image by it being a more positive article	11	A. It appears to be.
12	than the first one. And I remember that that was	12	Q. Okay. Is the fax number for you
13	why I wanted to use Sitrick.	13	correct?
14	Q. Did you ever discuss NXIVM Exhibit	14	A. Yes, it is.
15	18 with anybody at Sitrick?	15	Q. Correct as of November 23rd, 2004?
16	A. I don't think so.	16	A. Yes, it is.
17	Q. Can you turn to page 6 of NXIVM	17	Q. Okay. I'm going to ask you a
18	Exhibit 18, which bears the Bates No. NXR 00173?	18	couple of questions concerning this document. If
19	There's a paragraph with the heading	19	the answers relate to conversations you had with
20	"communications." I'd like you to review the	20	your own counsel, I don't want those answers.
	•	21	A. Okay.
21	paragraph.		-
21 22	A. At the top?	22	Q. When was the first time you saw a
	A. At the top?Q. The paragraph with the heading	22 23	Q. When was the first time you saw a form of this agreement?
22	A. At the top?		
22 23	A. At the top?Q. The paragraph with the heading	23	form of this agreement?

	Page 49		Page 51
1	SALZMAN - DAY I	1	SALZMAN - DAY I
2	drafts before you signed this?	2	A. It was sent from my home.
3	A. Not that I recall.	3	Q. Does anyone else at your home use
4	Q. Did you have any discussions	4	the fax machine for NXIVM business besides you?
5	concerning this agreement with anybody at NXIVM?	5	A. Yes.
6	A. I believe that I discussed this	6	Q. Who is that?
7	with Kristin Keeffe.	7	A. Anyone who needs to send a fax who
8	Q. What did you discuss?	8	is at my home. I do a lot of business out of my
9	A. What it was.	9	home.
10	Q. What did she say?	10	Q. Do you have an understanding as to
11	A. She said it was an agreement with	11	whether Interfor asked NXIVM to sign an indemnity
12	Interfor that we needed to sign, to take	12	agreement when it was first retained?
13	responsibility should there be a problem with the	13	A. To the best of my knowledge, it was
14	work that Juval Aviv or his company did; something	14	supposed to be done. I didn't find that out,
15	like that.	15	though, until close to the time I signed this.
16	Q. Did you have an understanding as to	16	MR. LANDY: Put that aside. Let's
17	why you were being asked to sign this agreement on	17	move on. I'm going to show you a document
18	or about November 23rd, 2004?	18	that has been previously marked as NXIVM
19	A. I was told by Kristin that he had	19	Exhibit 24.
20	all of his clients sign this.	20	I'll first ask if you recognize the
21	Q. It's correct that as of November	21	document in general, and then I'm going to
22	23rd, 2004, Interfor had already been retained for	22	point you to the specific portion of it. If
23	some period of time?	23	you feel you need to take the time to read the
24	A. That's correct.	24	entire document, you can, but I will lead you
25	Q. Did you ask anyone why you were	25	to the paragraph that I'm interested in.
	Page 50		Page 52
			5
1	SALZMAN - DAY I	1	SALZMAN - DAY I
1 2		1 2	SALZMAN - DAY I
	not let me start again.		SALZMAN - DAY I A. I recognize the document.
2	not let me start again. Did you ever speak to Juval Aviv	2	SALZMAN - DAY I A. I recognize the document. Q. Okay. What is it?
2	not let me start again.	2	SALZMAN - DAY I A. I recognize the document. Q. Okay. What is it? A. It's a article from Metroland.
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	Page 53		Page 55
1	SALZMAN - DAY I	1	SALZMAN - DAY I
2	MR. LANDY: It runs from 5 of 8 to	2	to show you what I'll ask the court reporter
3	6 of 8 or in the court document numbering,	3	to mark as Salzman Exhibit 5, which is a
4	it's 18 to 24 to 19 to 24.	4	multiple-page document bearing the Bates Nos.
5	MR. MC GUIRE: Fine. Should she	5	Interfor 0564 through 0566.
6	read some information before that to put that	6	(Exhibit Salzman 5 marked for
7	into perspective?	7	identification.)
8	MR. LANDY: If she needs to read	8	Q. Ms. Salzman, could you please
9	the whole document, that's fine. I'm only	9	review the document? And as always, my first
10	going to have a few	10	question will be whether or not you recognize it.
11	MR. MC GUIRE: Yes. It only took	11	A. Yes.
12	me	12	Q. What is it?
13	MR. LANDY: I'm only going to have	13	A. It's your retainer agreement.
14	a few short questions.	14	Q. And for the record, what do you
15	MR. MC GUIRE: It only took me a	15	mean by "your"?
16	short time.	16	A. Friedman Kaplan Seiler & Adelman,
17	MR. LANDY: And in case it helps	17	LLP.
18	the witness with her review, the only	18	Q. If you would turn your attention to
19	questions I expect to ask is whether she	19	the third page of the document, which bears the
20	recalls reading that section before and	20	Bates No. Interfor 0566, you'll see a number of
21	whether she discussed it with anybody.	21	signatures.
22	MR. MC GUIRE: I was unaware of	22	Is that your signature above the
23	that.	23	line where it states "Nancy Salzman"?
24	Q. Okay. So, the first question	24	A. It is.
25	pertaining to the section that I mentioned is	25	Q. Okay. Do you recall signing this
	Page 54		Page 56
	rage Ji		
1	CALTMAN DAVI	1	
1	SALZMAN - DAY I	1	SALZMAN - DAY I
2	whether you recall reading that section before.	2	SALZMAN - DAY I document?
2	whether you recall reading that section before. A. You know, oddly enough, I don't	2	SALZMAN - DAY I document? A. I do.
2 3 4	whether you recall reading that section before. A. You know, oddly enough, I don't remember it. Oddly enough, I thought I read this	2 3 4	SALZMAN - DAY I document? A. I do. Q. Did you sign it on or around August
2 3 4 5	whether you recall reading that section before. A. You know, oddly enough, I don't remember it. Oddly enough, I thought I read this article.	2 3 4 5	SALZMAN - DAY I document? A. I do. Q. Did you sign it on or around August 11, 2006?
2 3 4 5 6	whether you recall reading that section before. A. You know, oddly enough, I don't remember it. Oddly enough, I thought I read this article. Q. All right. Then I guess we'll move	2 3 4 5 6	SALZMAN - DAY I document? A. I do. Q. Did you sign it on or around August 11, 2006? A. I did.
2 3 4 5 6 7	whether you recall reading that section before. A. You know, oddly enough, I don't remember it. Oddly enough, I thought I read this article. Q. All right. Then I guess we'll move on.	2 3 4 5 6 7	SALZMAN - DAY I document? A. I do. Q. Did you sign it on or around August 11, 2006? A. I did. Q. Below your signature there is a
2 3 4 5 6 7 8	whether you recall reading that section before. A. You know, oddly enough, I don't remember it. Oddly enough, I thought I read this article. Q. All right. Then I guess we'll move on. I'm just going back very briefly to	2 3 4 5 6 7 8	SALZMAN - DAY I document? A. I do. Q. Did you sign it on or around August 11, 2006? A. I did. Q. Below your signature there is a handwritten paragraph. Is that your handwriting?
2 3 4 5 6 7 8 9	whether you recall reading that section before. A. You know, oddly enough, I don't remember it. Oddly enough, I thought I read this article. Q. All right. Then I guess we'll move on. I'm just going back very briefly to the indemnity agreement, which is Salzman Exhibit	2 3 4 5 6 7 8 9	SALZMAN - DAY I document? A. I do. Q. Did you sign it on or around August 11, 2006? A. I did. Q. Below your signature there is a handwritten paragraph. Is that your handwriting? A. It is.
2 3 4 5 6 7 8 9	whether you recall reading that section before. A. You know, oddly enough, I don't remember it. Oddly enough, I thought I read this article. Q. All right. Then I guess we'll move on. I'm just going back very briefly to the indemnity agreement, which is Salzman Exhibit 4. Do you recall there being any connection	2 3 4 5 6 7 8 9	SALZMAN - DAY I document? A. I do. Q. Did you sign it on or around August 11, 2006? A. I did. Q. Below your signature there is a handwritten paragraph. Is that your handwriting? A. It is. Q. Do you recall writing it?
2 3 4 5 6 7 8 9 10	whether you recall reading that section before. A. You know, oddly enough, I don't remember it. Oddly enough, I thought I read this article. Q. All right. Then I guess we'll move on. I'm just going back very briefly to the indemnity agreement, which is Salzman Exhibit 4. Do you recall there being any connection between Interfor's request that the agreement be	2 3 4 5 6 7 8 9 10	SALZMAN - DAY I document? A. I do. Q. Did you sign it on or around August 11, 2006? A. I did. Q. Below your signature there is a handwritten paragraph. Is that your handwriting? A. It is. Q. Do you recall writing it? A. I do.
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2 3 4 5 6 7 8 9 10 11 12 13	whether you recall reading that section before. A. You know, oddly enough, I don't remember it. Oddly enough, I thought I read this article. Q. All right. Then I guess we'll move on. I'm just going back very briefly to the indemnity agreement, which is Salzman Exhibit 4. Do you recall there being any connection between Interfor's request that the agreement be signed and Juval Aviv's meeting with Rick Ross? A. I'm sorry.	2 3 4 5 6 7 8 9 10 11 12	SALZMAN - DAY I document? A. I do. Q. Did you sign it on or around August 11, 2006? A. I did. Q. Below your signature there is a handwritten paragraph. Is that your handwriting? A. It is. Q. Do you recall writing it? A. I do. Q. At the end of the handwritten paragraph, there is there are two initials, one
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2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18 19 20	whether you recall reading that section before. A. You know, oddly enough, I don't remember it. Oddly enough, I thought I read this article. Q. All right. Then I guess we'll move on. I'm just going back very briefly to the indemnity agreement, which is Salzman Exhibit 4. Do you recall there being any connection between Interfor's request that the agreement be signed and Juval Aviv's meeting with Rick Ross? A. I'm sorry. (The requested portion of the record was read.) A. No. Q. Do you know when do you recall when the meeting with Mr. Ross strike that. Start again. I may have asked this before, but	2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18 19 20	SALZMAN - DAY I document? A. I do. Q. Did you sign it on or around August 11, 2006? A. I did. Q. Below your signature there is a handwritten paragraph. Is that your handwriting? A. It is. Q. Do you recall writing it? A. I do. Q. At the end of the handwritten paragraph, there is there are two initials, one of which appears to say the "NS." Are those your initials? A. Those are my initials. Q. Do you know whose initials the other set of initials are? A. You know, I can't remember. Q. Fine. Let's move forward. In the
2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18 19 20 21	whether you recall reading that section before. A. You know, oddly enough, I don't remember it. Oddly enough, I thought I read this article. Q. All right. Then I guess we'll move on. I'm just going back very briefly to the indemnity agreement, which is Salzman Exhibit 4. Do you recall there being any connection between Interfor's request that the agreement be signed and Juval Aviv's meeting with Rick Ross? A. I'm sorry. (The requested portion of the record was read.) A. No. Q. Do you know when do you recall when the meeting with Mr. Ross strike that. Start again. I may have asked this before, but do you know now when the meeting between Mr. Ross	2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18 19 20 21	SALZMAN - DAY I document? A. I do. Q. Did you sign it on or around August 11, 2006? A. I did. Q. Below your signature there is a handwritten paragraph. Is that your handwriting? A. It is. Q. Do you recall writing it? A. I do. Q. At the end of the handwritten paragraph, there is there are two initials, one of which appears to say the "NS." Are those your initials? A. Those are my initials. Q. Do you know whose initials the other set of initials are? A. You know, I can't remember. Q. Fine. Let's move forward. In the handwritten section, starting in the middle of the
2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18 19 20 21 22	whether you recall reading that section before. A. You know, oddly enough, I don't remember it. Oddly enough, I thought I read this article. Q. All right. Then I guess we'll move on. I'm just going back very briefly to the indemnity agreement, which is Salzman Exhibit 4. Do you recall there being any connection between Interfor's request that the agreement be signed and Juval Aviv's meeting with Rick Ross? A. I'm sorry. (The requested portion of the record was read.) A. No. Q. Do you know when do you recall when the meeting with Mr. Ross strike that. Start again. I may have asked this before, but do you know now when the meeting between Mr. Ross and Mr. Aviv occurred, the first meeting?	2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18 19 20 21 22	SALZMAN - DAY I document? A. I do. Q. Did you sign it on or around August 11, 2006? A. I did. Q. Below your signature there is a handwritten paragraph. Is that your handwriting? A. It is. Q. Do you recall writing it? A. I do. Q. At the end of the handwritten paragraph, there is there are two initials, one of which appears to say the "NS." Are those your initials? A. Those are my initials. Q. Do you know whose initials the other set of initials are? A. You know, I can't remember. Q. Fine. Let's move forward. In the handwritten section, starting in the middle of the third line, continuing through the end of the
2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18 19 20 21 22 23	whether you recall reading that section before. A. You know, oddly enough, I don't remember it. Oddly enough, I thought I read this article. Q. All right. Then I guess we'll move on. I'm just going back very briefly to the indemnity agreement, which is Salzman Exhibit 4. Do you recall there being any connection between Interfor's request that the agreement be signed and Juval Aviv's meeting with Rick Ross? A. I'm sorry. (The requested portion of the record was read.) A. No. Q. Do you know when do you recall when the meeting with Mr. Ross strike that. Start again. I may have asked this before, but do you know now when the meeting between Mr. Ross and Mr. Aviv occurred, the first meeting? A. The date? I don't remember.	2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18 19 20 21 22 23	SALZMAN - DAY I document? A. I do. Q. Did you sign it on or around August 11, 2006? A. I did. Q. Below your signature there is a handwritten paragraph. Is that your handwriting? A. It is. Q. Do you recall writing it? A. I do. Q. At the end of the handwritten paragraph, there is there are two initials, one of which appears to say the "NS." Are those your initials? A. Those are my initials. Q. Do you know whose initials the other set of initials are? A. You know, I can't remember. Q. Fine. Let's move forward. In the handwritten section, starting in the middle of the fourth line, you have the phrase:
2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18 19 20 21 22	whether you recall reading that section before. A. You know, oddly enough, I don't remember it. Oddly enough, I thought I read this article. Q. All right. Then I guess we'll move on. I'm just going back very briefly to the indemnity agreement, which is Salzman Exhibit 4. Do you recall there being any connection between Interfor's request that the agreement be signed and Juval Aviv's meeting with Rick Ross? A. I'm sorry. (The requested portion of the record was read.) A. No. Q. Do you know when do you recall when the meeting with Mr. Ross strike that. Start again. I may have asked this before, but do you know now when the meeting between Mr. Ross and Mr. Aviv occurred, the first meeting?	2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18 19 20 21 22	SALZMAN - DAY I document? A. I do. Q. Did you sign it on or around August 11, 2006? A. I did. Q. Below your signature there is a handwritten paragraph. Is that your handwriting? A. It is. Q. Do you recall writing it? A. I do. Q. At the end of the handwritten paragraph, there is there are two initials, one of which appears to say the "NS." Are those your initials? A. Those are my initials. Q. Do you know whose initials the other set of initials are? A. You know, I can't remember. Q. Fine. Let's move forward. In the handwritten section, starting in the middle of the third line, continuing through the end of the

	Page 57		Page 59
1	SALZMAN - DAY I	1	SALZMAN - DAY I
2	NXIVM and Interfor."	2	lawsuit?
3	Did I read your handwriting	3	A. I believe we did for a period of
4	correctly?	4	time.
5	A. Yes.	5	Q. Looking back at Salzman Exhibit 5,
6	Q. Is that phrase a reference to the	6	did NXIVM ever terminate this agreement?
7	October 23rd, 2004 indemnification agreement that	7	A. I believe we did.
8	we previously marked as Salzman Exhibit 4?	8	Q. When?
9	A. I believe it is.	9	A. I believe it was in 2007.
10	Q. Are there any other indemnification	10	Q. How did you do it?
11	agreements that you're aware of between NXIVM and	11	A. I believe I wrote a letter and gave
12	Interfor?	12	three days' notice.
13	A. Not that I recall.	13	Q. Who did you write the letter to?
14	Q. Did NXIVM hire Friedman Kaplan	14	A. I don't recall. I think it was
15	Seiler & Adelman to represent Interfor in	15	Friedman & Kaplan.
16	connection with this present lawsuit?	16	Q. Did you retain a copy of that
17	MR. MC GUIRE: Did NXIVM hire?	17	letter?
18	Q. Did NXIVM hire Friedman Kaplan	18	A. I believe we did.
19	Seiler & Adelman to represent Interfor in	19	MR. LANDY: Okay. To the extent
20	connection with this lawsuit?	20	such a letter has not been produced,
21	A. I believe we agreed to pay them in	21	Mr. McGuire, we ask that it be produced.
22	connection with this lawsuit.	22	MR. MC GUIRE: I think it was
23	Q. Why did NXIVM agree to pay in	23	produced. During the luncheon break, I'll try
24	connection with this lawsuit?	24	to identify that.
25	A. I believe that I was advised	25	MR. LANDY: Okay. I'm going to
	Page 58	23	Page 60
1	SALZMAN - DAY I	1	SALZMAN - DAY I
1 2		1 2	
3	because of the indemnity agreement, I was required	3	mark a number of documents.
4	to. O Who advised you of that?		(Exhibit Salzman 6 through 13
5	Q. Who advised you of that?	4 5	marked for identification.)
_	A. I believe it was the attorneys that	l .	MR. LANDY: I've asked the court
6	were attorneys at this time.	6	reporter to mark eight exhibits as Salzman 6
7	MR. MC GUIRE: When you say	7	411- 12
0	llattamasasa llalamina tlas accusas aftlais	١ ,	through 13.
8	"attorneys," during the course of this	8	Salzman Exhibit 6 is a
9	litigation I would move that that be stricken.	9	Salzman Exhibit 6 is a multiple-page document bearing the Bates Nos.
9 10	litigation I would move that that be stricken. I was assuming that	9 10	Salzman Exhibit 6 is a multiple-page document bearing the Bates Nos. Interfor 0364 through 0365.
9 10 11	litigation I would move that that be stricken. I was assuming that MR. LANDY: Well, let's see. We're	9 10 11	Salzman Exhibit 6 is a multiple-page document bearing the Bates Nos. Interfor 0364 through 0365. Salzman Exhibit 7 is a
9 10 11 12	litigation I would move that that be stricken. I was assuming that MR. LANDY: Well, let's see. We're referring to what side of the bargain we're	9 10 11 12	Salzman Exhibit 6 is a multiple-page document bearing the Bates Nos. Interfor 0364 through 0365. Salzman Exhibit 7 is a multiple-page document bearing the Bates Nos.
9 10 11 12 13	litigation I would move that that be stricken. I was assuming that MR. LANDY: Well, let's see. We're referring to what side of the bargain we're talking about.	9 10 11 12 13	Salzman Exhibit 6 is a multiple-page document bearing the Bates Nos. Interfor 0364 through 0365. Salzman Exhibit 7 is a multiple-page document bearing the Bates Nos. 0367 through 0368.
9 10 11 12 13 14	litigation I would move that that be stricken. I was assuming that MR. LANDY: Well, let's see. We're referring to what side of the bargain we're talking about. MR. MC GUIRE: Right. Why don't	9 10 11 12 13 14	Salzman Exhibit 6 is a multiple-page document bearing the Bates Nos. Interfor 0364 through 0365. Salzman Exhibit 7 is a multiple-page document bearing the Bates Nos. 0367 through 0368. Salzman Exhibit 8 is a
9 10 11 12 13 14 15	litigation I would move that that be stricken. I was assuming that MR. LANDY: Well, let's see. We're referring to what side of the bargain we're talking about. MR. MC GUIRE: Right. Why don't you ask her which attorneys?	9 10 11 12 13 14 15	Salzman Exhibit 6 is a multiple-page document bearing the Bates Nos. Interfor 0364 through 0365. Salzman Exhibit 7 is a multiple-page document bearing the Bates Nos. 0367 through 0368. Salzman Exhibit 8 is a multiple-page document bearing the Bates Nos.
9 10 11 12 13 14 15	litigation I would move that that be stricken. I was assuming that MR. LANDY: Well, let's see. We're referring to what side of the bargain we're talking about. MR. MC GUIRE: Right. Why don't you ask her which attorneys? Q. Did you receive advice I won't	9 10 11 12 13 14 15	Salzman Exhibit 6 is a multiple-page document bearing the Bates Nos. Interfor 0364 through 0365. Salzman Exhibit 7 is a multiple-page document bearing the Bates Nos. 0367 through 0368. Salzman Exhibit 8 is a multiple-page document bearing the Bates Nos. Interfor 0374 and 0375.
9 10 11 12 13 14 15 16	litigation I would move that that be stricken. I was assuming that MR. LANDY: Well, let's see. We're referring to what side of the bargain we're talking about. MR. MC GUIRE: Right. Why don't you ask her which attorneys? Q. Did you receive advice I won't ask you what the advice was concerning NXIVM's	9 10 11 12 13 14 15 16 17	Salzman Exhibit 6 is a multiple-page document bearing the Bates Nos. Interfor 0364 through 0365. Salzman Exhibit 7 is a multiple-page document bearing the Bates Nos. 0367 through 0368. Salzman Exhibit 8 is a multiple-page document bearing the Bates Nos. Interfor 0374 and 0375. Salzman Exhibit 9 is a
9 10 11 12 13 14 15 16 17	litigation I would move that that be stricken. I was assuming that MR. LANDY: Well, let's see. We're referring to what side of the bargain we're talking about. MR. MC GUIRE: Right. Why don't you ask her which attorneys? Q. Did you receive advice I won't ask you what the advice was concerning NXIVM's agreement or NXIVM's obligation to pay Interfor's	9 10 11 12 13 14 15 16 17	Salzman Exhibit 6 is a multiple-page document bearing the Bates Nos. Interfor 0364 through 0365. Salzman Exhibit 7 is a multiple-page document bearing the Bates Nos. 0367 through 0368. Salzman Exhibit 8 is a multiple-page document bearing the Bates Nos. Interfor 0374 and 0375. Salzman Exhibit 9 is a multiple-page document bearing the Bates Nos.
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9 10 11 12 13 14 15 16 17 18 19 20	litigation I would move that that be stricken. I was assuming that MR. LANDY: Well, let's see. We're referring to what side of the bargain we're talking about. MR. MC GUIRE: Right. Why don't you ask her which attorneys? Q. Did you receive advice I won't ask you what the advice was concerning NXIVM's agreement or NXIVM's obligation to pay Interfor's legal fees from an attorney? A. I believe I did.	9 10 11 12 13 14 15 16 17 18 19 20	Salzman Exhibit 6 is a multiple-page document bearing the Bates Nos. Interfor 0364 through 0365. Salzman Exhibit 7 is a multiple-page document bearing the Bates Nos. 0367 through 0368. Salzman Exhibit 8 is a multiple-page document bearing the Bates Nos. Interfor 0374 and 0375. Salzman Exhibit 9 is a multiple-page document bearing the Bates Nos. Interfor 0377 and 0378. Salzman Exhibit 10 is a
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2 And Salzman Exhibit 12 bears the 3 Bates Nos. Interfor 0389 through 0393. 4 And Salzman Exhibit 13 bears the 5 Bates Nos. Interfor 0395 through 0397. 6 Q. Ms. Salzman, have you seen any of these documents before? 7 these documents before? 8 A. I don't think. 9 Q. In your capacity as president of NXIVM, are you involved in the payment of legal bills? 10 NXIVM, are you involved in the payment of lad literative lade bills? 11 A. I minvolved in the payment of lade literative lade bills? 12 A. I minvolved in the payment of lade literative lade lade lade lade lade lade lade lad	1	SALZMAN - DAY I	1	SALZMAN - DAY I
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25 document, Interfor 0375, states that there is a 25 MR. MC GUIRE: Object to the form	2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18 19 20 21 22 23	not retainers. This is a question from your recollection. A. I don't recall. Q. I refer you back to Salzman Exhibit 5, which is the retainer letter. If you look on the second page of that document, the second paragraph states or the final paragraph of the second page says. "We asked Steve to confirm your agreement with the foregoing by signing a copy of this letter and returning it to us, in NXIVM's case, with a check in the amount of \$25,000. We appreciate the opportunity to be of service to Interfor." Does that refresh your recollection as to whether or not you approved the payment of a \$25,000 retainer to Friedman Kaplan Seiler & Adelman? A. It does. It appears I did. Thank you. Q. All right. If you would look at Salzman Exhibit 8, which is the third in the	2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18 19 20 21 22 23	invoice due of \$14,870.50, and the February 14th states a current invoice due of \$59,366.89? MR. MC GUIRE: What number is that? MR. LANDY: I'm looking at 10 and 11, which are January 11, '07 and February 14, '07. Q. The question is whether you approved the payment of those invoices and whether you have any reason to believe that NXIVM did not? A. I believe I did, and I don't have reason to believe I didn't. Q. All right. With respect to Salzman Exhibit 13, which is the May 7, 2007 invoice, if you let's look at 13 first. If you look at the last page, you'll see that there is a total balance due of 56,027.29. With the exception of that total balance due, did NXIVM pay the entirety of the amounts due under all previous invoices under the retainer agreement?
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	Page 65		Page 67
1	SALZMAN - DAY I	1	SALZMAN - DAY I
2	of that question.	2	(Luncheon recess: 12:49 p.m.)
3	(The requested portion of the	3	(Exhibit Salzman 14 marked for
4	record was read.)	4	identification.)
5	Q. That is to say in the May 7th, 2007	5	Q. Ms. Salzman, prior to the lunch
6	bill there is a total balance payable of	6	break, we were discussing a number of payments
7	\$56,027.29. My question is with respect to	7	made by NXIVM to Friedman Kaplan Seiler & Adelman.
8	everything prior to that total balance due.	8	Do you recall that?
9	MR. MC GUIRE: To the 56,000?	9	A. Yes.
10	MR. LANDY: Yes. That 56,000	10	Q. Okay. Were those payments made
11	represents an amount due and owing. There	11	under the indemnity agreement, which was marked as
12	were a number of bills before that amount	12	Salzman Exhibit 4?
13	accrued. The question relates to the sums	13	A. They were.
14	that are detailed in the invoices prior to	14	Q. We have marked as Salzman Exhibit
15	that amount being due, and whether or not	15	14 documents entitled "Verified Counterclaim,"
16	so, the question is	16	which is Document No. 70 filed in this action.
17	MR. MC GUIRE: If you know, you can	17	Do you recognize this document?
18	answer.	18	A. I do.
19	A. I believe we did.	19	Q. When was the first time you saw it?
20	Q. All right. Do you have any reason	20	A. I think somewhere in the beginning
21	to believe you did not?	21	of 2007. I'm not sure. Is that when it was
22	A. No.	22	filed?
23	Q. Okay. If you would put in front of	23	Q. I can represent to you that it was
24	you the April 6th, 2007 invoice, which is Salzman	24	filed on January 11th, 2007.
25	Exhibit 12. And you can do this just by looking	25	A. I believe it was in the beginning
	Page 66		Page 68
1	SALZMAN - DAY I	1	SALZMAN - DAY I
2	at the last page of that.	2	of that year.
3	A. Okay.	3	Q. Was it before April of 2007?
4	Q. As well as the May 7, 2007 invoice,	4	A. I think it was, but I'm not sure.
5	which is Salzman Exhibit 13, which are Interfor	5	I think it was.
6	0393 and then Interfor 0397.	6	Q. Did you ever discuss this document
7	What I'd like you to do,	7	with anyone at Interfor?
8	Ms. Salzman, is using the calculator we provided	8	A. I did not.
9	you, which I'll make representation has not been	9	Q. Did anyone at NXIVM discuss this
10	rigged, determine the difference between the total	10	document with anyone at Interfor?
11	balance due on the April 6th, 2007 invoice and the	11	MR. MC GUIRE: To your knowledge.
12	total balance due on the May 7, 2007 invoice.	12	A. I don't believe so.
13	A. \$55,010.51.	13	Q. All right. I'm going to show you a
14	Q. I gave you the wrong number to do.	14	document that's been previously marked as NXIVM
15	Sorry. The difference that we need is the	15	Exhibit 9.
16	difference between the total balance due on April	16	Have you ever seen this document
17	6th, and the previous balance due on May 7th,	17	before?
18	which is 111,037.80 minus 51,670.91.	18	A. I have.
		19	Q. When did you first see it?
19	MR. MC GUIRE: Where does the 51	エク	
19 20		20	- ·
	MR. MC GUIRE: Where does the 51 come from?		A. At Keith Raniere's deposition.
20 21	MR. MC GUIRE: Where does the 51 come from? MR. LANDY: The previous due on May	20	A. At Keith Raniere's deposition.Q. Notwithstanding when you saw the
20	MR. MC GUIRE: Where does the 51 come from?	20 21	A. At Keith Raniere's deposition. Q. Notwithstanding when you saw the document, I'm going to direct your attention to
20 21 22	MR. MC GUIRE: Where does the 51 come from? MR. LANDY: The previous due on May 7th, 2007.	20 21 22	A. At Keith Raniere's deposition.Q. Notwithstanding when you saw the
20 21 22 23	MR. MC GUIRE: Where does the 51 come from? MR. LANDY: The previous due on May 7th, 2007. A. You want me to take the total.	20 21 22 23	A. At Keith Raniere's deposition. Q. Notwithstanding when you saw the document, I'm going to direct your attention to the third paragraph, the bracketed statement,

Page 71 Page 69

SALZMAN - DAY I

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but is not limited to the 'sting operation' that Keith has proposed having Interfor undertake with respect to Mr. Ross."

We've already talked about that. Strike the question.

Did you ever become aware of a proposed second stage of the sting operation where Ross would perform an intervention to convince a young woman to leave NXIVM?

MR. MC GUIRE: I'll object to the form of that question. If you understood it, vou can answer.

- A. I don't understand the question.
- Q. Okay. Did you ever -- did there come a time when you understood or learned that as part of the sting operation, Interfor would arrange for Ross to meet with a young woman, where it would be -- where Ross would be told that it was his job to attempt to convince that woman to leave NXIVM?
- A. When Ross posed the sting operation, or when I first heard about the sting operation, I believe the sting operation was that there would be a mother and a daughter, that the

SALZMAN - DAY I

SALZMAN - DAY I

concerning the possibility of Ms. Keeffe posing as the young woman with anybody else?

- A. I don't remember having any other discussions about it. I don't think Joe O'Hara was there.
- Q. When you say "not there," do you mean this may have been after he was no longer --
- A. No, in the discussion about Kristin.
 - Q. Okay.

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- A. I don't remember when it occurred. I don't remember Joe O'Hara being there. I do remember that she brought the idea up, though.
 - Q. "She" meaning Kristin?
 - A. Correct.
- Q. Do you have an understanding of what the purpose of that portion of the sting was?
- A. No, not really. I don't think I ever understood the sting. I still don't think I understand the sting.
- Q. What were the purposes of the overall Ross investigation?
 - A. I originally hired Ross to --
 - You mean you originally Interfor?

Page 72

Page 70

mother would be distraught because the daughter was a member of the "cult." That he would be hired by the mother, and then he would deprogram the daughter.

They asked me if they could use members of my organization, and I was completely opposed to it, and I didn't like the idea. I never liked the idea. I didn't want them to do it.

Q. Did Mr. Ross ever meet with the supposed daughter?

MR. MC GUIRE: To your knowledge.

- Q. Do you recall any conversations concerning whether Kristin Keeffe would pose as that daughter?
 - A. I do recall a conversation.
- Q. Who was that with?
 - A. Kristin Keeffe.
- 21 Q. And what did Ms. Keeffe say to you?
 - A. That she wanted to do that.
 - Q. And what did you say?
 - A. I didn't think it was a good idea.
 - Did you have any discussions

SALZMAN - DAY I

A. I originally hired Interfor at O'Hara and Rich Weiner's request to get information on Kristin Snyder. Everything else came after that as a result of meetings that occurred with Mr. Juval Aviv, who brought a series of data points to us that inspired continuing to use his services.

I was adverse to using his services because none of the data that I received from him seemed to be documented in any way that could be verified in any way. Although his allegations seemed to bring up an awful lot of concern in me, in case any of them were true. And I consistently was unhappy with the fact that nothing could be verified, and that he expanded the scope of the investigation by bringing multiple allegations of other things that I didn't ask him to do, nor did I hire him to do.

Q. Did you ever express this discontent to Mr. Aviv?

A. I didn't see him. Many times I expressed it to Kristin and to Joe O'Hara, and to my attorneys, because it kept seeming to get larger and larger to me, and I wasn't sure how

	Page 73		Page 75
1	SALZMAN - DAY I	1	SALZMAN - DAY I
2	that was happening, but it was of concern, and not	2	contact with Interfor in the period of fall 2004
3	verifiable.	3	to the spring of 2005?
4	Q. Did NXIVM ever refuse to pay one of	4	A. I'm not sure.
5	Interfor's invoices?	5	Q. Was she responsible to attend to
6	A. I don't remember refusing to pay	6	the day-to-day affairs of Interfor's
7	one of his invoices, but I do remember, at a	7	investigations on NXIVM's behalf?
8	certain point, saying that I didn't want to do it	8 9	A. I don't understand the question.
9 10	anymore and cutting off contact. Q. Was that in and around May of 2005?	10	Q. You previously testified that her job was to coordinate between counsel and
11	A. I believe it was; between April and	11	Interfor. Is that correct?
12	May.	12	A. That's correct.
13	Q. Did Kristin Keeffe ever tell you	13	Q. Was anyone else at NXIVM did
14	that she had obtained a list of telephone numbers	14	anyone else at NXIVM have the responsibility of,
15	that Mr. Ross had called?	15	for lack of a better term, dealing with Interfor,
16	A. That she had obtained	16	other than her?
17	Q. A list of telephone numbers that	17	A. No.
18	Mr. Ross had called.	18	Q. Did Ms. Keeffe ever express
19	A. I believe I read that in that	19	concerns to you over Interfor's actions in
20	report. There was a list of people.	20	connection with the Ross investigation?
21	Q. The question relates to phone	21	A. Not that I remember.
22	numbers, not people.	22	Q. Did Ms. Keeffe tell you that
23	A. I don't think so.	23	Interfor had collected Mr. Ross' trash as part of
24	Q. Have you ever spoken to anyone you	24	the investigation?
25	understand to work for the Church of Scientology?	25	A. The first that I heard of the
	Page 74		Page 76
1	SALZMAN - DAY I	1	SALZMAN - DAY I
2	A. To work for them?	2	collection of trash was when those papers came
3	Q. To work for.	3	out.
4	A. I don't think so.	4	Q. Do you remember who you heard it
5	Q. Have you ever spoken to anyone you	5	from?
6	understand to be a representative of the Church of	6	A. I'm going to assume it was Kristin
7 8	Scientology? A. I don't understand the question	7 8	Keeffe. Q. Did you ever speak to anybody at
9	"representative."	9	Interfor concerning the collection of Mr. Ross'
10	Q. I'm making the distinction of	10	trash?
11	people who may be scientologists and people who	11	A. No.
12	are actually part of the establishment?	12	Q. Did anyone at NXIVM speak to anyone
13	A. No, I've never met anyone who is	13	at Interfor concerning the collection of Mr. Ross'
14	part of the establishment of scientology.	14	trash?
15	Q. Have you ever met anyone that you	15	A. I don't think so. I don't know,
16	understood to be involved with or a member of the	16	though.
17	Church of Scientology?	17	Q. Did you ever discuss an article
18	A. Yes.	18	written by John Hochman while at a meeting at
19	Q. Have you ever had a conversation	19	Interfor's offices?
20	we'll just refer to them as a scientologist.	20	A. I don't know if I did. I'm sure
21	Have you ever had a conversation	21	that it was discussed with him, but I'm not sure
22	with a scientologist concerning Rick Ross?	22	that I discussed it with him personally. I don't
23	A. No.Q. Are you aware of strike that.	23	remember discussing it. Q. Do you have any recollection of
//:	LI ATA VALLAWATA AT CITIVA that	24	LI LIO VOIL DAVE ANY RECOLLECTION OF
24 25	Q. Are you aware of strike that. How often was Kristin Keeffe in	25	saying that you would provide a written rebuttal

Page 79 Page 77 1 1 SALZMAN - DAY I SALZMAN - DAY I 2 2 directly to the Hochman report to both Sitrick and a document that appears as though I was at that 3 3 Interfor? meeting. 4 A. I remember that we were preparing 4 Q. Do you know whether or not 5 5 one, and I remember now reading it. I did offer Ms. Keeffe, in fact, did possess communications 6 6 it. It was requested of me. Somebody -- it was from Mr. Ross' boyfriend? requested of me at a certain point, and I was 7 A. I believe that she may have gotten 7 8 putting it together. And I know that I or Kristin 8 some data from Joe O'Hara. And if they were those 9 9 offered that I would do it, that I would send it communications, it could have been that, but my 10 10 memory of it is not clear. when it was complete. Q. Did you ever attend a meeting at Q. Do you know whether she offered to 11 11 12 Interfor's offices where Kristin Keeffe was 12 give the -- give that data or those data to 13 13 Interfor? present? 14 14 A. I do remember being in a meeting A. Yes. 15 15 Q. At any of those meetings did where she offered to give some of that data to 16 Kristin Keeffe state that she had learned that 16 Juval Aviv. 17 Mr. Ross had an Indonesian boyfriend? 17 Q. Has Juval Aviv ever met Keith 18 A. I read that in some notes. 18 Raniere in person? 19 Q. The question is what Ms. Keeffe 19 A. Yes. 20 2.0 Q. When was that? said. 21 21 A. I don't remember her saying that, A. It was at a dinner in my house. 2.2 because I don't remember that he was Indonesian. 2.2 Q. How long did that dinner last? 23 23 A. Well, it was an evening. It was a but --24 24 Q. Do you remember her saying that she whole dinner, including dessert. A couple of 25 25 had learned that Rick Ross had a boyfriend? Page 78 Page 80 1 SALZMAN - DAY I SALZMAN - DAY I 1 2 2 A. Yes. O. Somewhere between two and four 3 3 hours? Q. Was this at a -- did she say this 4 4 at a meeting at Interfor's offices? A. I would say. 5 A. She may have. I don't remember 5 Q. Okay. Was Mr. Ross discussed at б when I first heard it. 6 that dinner? 7 7 Q. Do you recall Ms. Keeffe ever A. Not that I remember. 8 stating that she had obtained all of Mr. Ross' 8 Q. Was any of the work that Interfor 9 boyfriend's communications through July of 2004? 9 had done in the course of the investigation of 10 A. Can I have the question again? 10 Mr. Ross discussed at that dinner? 11 (The requested portion of the 11 A. No. 12 O. When was this dinner? 12 record was read.) 13 A. I believe it was fairly early from 13 I can't remember when I learned 14 14 the time that we retained Mr. Aviv. I think it that. I know that I know it now. I don't know 15 15 was probably in the first two months, maybe three. when I first heard it. 16 Q. What do you -- you say that you 16 Q. Has Mr. Aviv ever been to -- I'm 17 know it now. You know what? going to refer to it as the NXIVM center, but it's 17 NXIVM's offices in Albany, New York or NXIVM's 18 18 A. That that statement was in some of 19 the documents that I read. 19 location in Albany, New York -- to your knowledge? 20 20 A. I think he was. When he came to my O. That's not the question. 21 A. I know. I can't remember when I 21 house for dinner, I believe Kristin took him to 22 22 first heard it, and I -- that's -- I don't the center and gave him a tour. 23 23 Q. Did you accompany them? remember first hearing it. 24 24 A. I don't remember being there. I don't remember being in a meeting

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where it was said, although -- I remember reading

Q. Have you ever heard of a person

	Page 81		Page 83
1	SALZMAN - DAY I	1	SALZMAN - DAY I
2	named Phil Robertson?	2	problems. He seemed to have investigated pretty
3	A. I have.	3	thoroughly and read all of the articles, looked at
4	Q. Who is Phil Robertson?	4	the Internet. He seemed to know a great deal
5	A. It's not his real name. His real	5	about us by the time I met him. And he led me to
6	name is Frank Parlato.	6	believe that he could change our public image.
7	Q. Who is Frank Parlato?	7	Q. Did you ever speak to him about
8	A. Frank Parlato is a I think he's	8	Juval Aviv or Interfor?
9	a businessman who also does public relations that	9	A. I don't think I did.
10	I was introduced to through Steve Pigeon, who is a	10	Q. In 2007, who was responsible for
11	consultant to NXIVM.	11	responding to inquiries from the press at NXIVM?
12	Q. Why does Mr. Parlato go by the name	12	A. We rarely responded to the press
13	Phil Robertson?	13	for most of the time we've been in business. When
14	A. I don't know.	14	the press contacted us, if I was in town, I would
15	Q. When did you learn that he used the	15 16	be advised. Most of the time we didn't I'd
16 17	alias Phil Robertson? A. When I first read that article that	17	make no responses. There were periods when we had public relations people in place, but if I was not
18		18	in town, probably Kristin would be called because
19	you just MR. LANDY: Let's make the record	19	she knew what was going on with legal and would
20	clear. And I will distribute what has been	20	advise the attorneys.
21	previously marked as NXIVM Exhibit 14.	21	Q. Does NXIVM have a general listed
22	Q. Do you recognize this document?	22	phone number?
23	A. I do.	23	A. I don't think so. Well, maybe it
24	Q. Is this the article you were just	24	does.
25	referring to?	25	Q. Does it have a main phone number?
	Page 82		Page 84
1	SALZMAN - DAY I	1	SALZMAN - DAY I
2	A. It is.	2	A. I think it has a main phone number.
3	Q. When did you first see this? And	3	Q. Who answers the phone?
4	by "this" I mean NXIVM Exhibit 14.	4	
			A. I think the phone rings in our
5	A. I believe that Kristin Keeffe	5	A. I think the phone rings in our accounting office.
6	A. I believe that Kristin Keeffe brought me a copy of it shortly after it came out.	5 6	A. I think the phone rings in our accounting office. Q. Who would be there? Let me back
6 7	A. I believe that Kristin Keeffe brought me a copy of it shortly after it came out. Q. Did Mr. Parlato ever work for	5 6 7	A. I think the phone rings in our accounting office. Q. Who would be there? Let me back this up. I'll give you a time frame.
6 7 8	A. I believe that Kristin Keeffe brought me a copy of it shortly after it came out. Q. Did Mr. Parlato ever work for NXIVM?	5 6 7 8	A. I think the phone rings in our accounting office. Q. Who would be there? Let me back this up. I'll give you a time frame. In fall of 2007, whose phone was
6 7 8 9	A. I believe that Kristin Keeffe brought me a copy of it shortly after it came out. Q. Did Mr. Parlato ever work for NXIVM? A. I don't think that he did.	5 6 7 8 9	A. I think the phone rings in our accounting office. Q. Who would be there? Let me back this up. I'll give you a time frame. In fall of 2007, whose phone was that?
6 7 8 9 10	A. I believe that Kristin Keeffe brought me a copy of it shortly after it came out. Q. Did Mr. Parlato ever work for NXIVM? A. I don't think that he did. Q. Was he ever a paid consultant?	5 6 7 8 9	A. I think the phone rings in our accounting office. Q. Who would be there? Let me back this up. I'll give you a time frame. In fall of 2007, whose phone was that? A. The administrative offices will
6 7 8 9 10 11	A. I believe that Kristin Keeffe brought me a copy of it shortly after it came out. Q. Did Mr. Parlato ever work for NXIVM? A. I don't think that he did. Q. Was he ever a paid consultant? A. I don't believe that we ever paid	5 6 7 8 9 10	A. I think the phone rings in our accounting office. Q. Who would be there? Let me back this up. I'll give you a time frame. In fall of 2007, whose phone was that? A. The administrative offices will answer the phone.
6 7 8 9 10 11	A. I believe that Kristin Keeffe brought me a copy of it shortly after it came out. Q. Did Mr. Parlato ever work for NXIVM? A. I don't think that he did. Q. Was he ever a paid consultant? A. I don't believe that we ever paid him.	5 6 7 8 9 10 11	A. I think the phone rings in our accounting office. Q. Who would be there? Let me back this up. I'll give you a time frame. In fall of 2007, whose phone was that? A. The administrative offices will answer the phone. Q. Is that any particular person?
6 7 8 9 10 11 12	A. I believe that Kristin Keeffe brought me a copy of it shortly after it came out. Q. Did Mr. Parlato ever work for NXIVM? A. I don't think that he did. Q. Was he ever a paid consultant? A. I don't believe that we ever paid him. Q. Have you ever spoken to Mr. Parlato	5 6 7 8 9 10 11 12	A. I think the phone rings in our accounting office. Q. Who would be there? Let me back this up. I'll give you a time frame. In fall of 2007, whose phone was that? A. The administrative offices will answer the phone. Q. Is that any particular person? A. A series of people.
6 7 8 9 10 11 12 13	A. I believe that Kristin Keeffe brought me a copy of it shortly after it came out. Q. Did Mr. Parlato ever work for NXIVM? A. I don't think that he did. Q. Was he ever a paid consultant? A. I don't believe that we ever paid him. Q. Have you ever spoken to Mr. Parlato about Rick Ross?	5 6 7 8 9 10 11 12 13	A. I think the phone rings in our accounting office. Q. Who would be there? Let me back this up. I'll give you a time frame. In fall of 2007, whose phone was that? A. The administrative offices will answer the phone. Q. Is that any particular person? A. A series of people. Q. Are any of them authorized to
6 7 8 9 10 11 12 13 14 15	A. I believe that Kristin Keeffe brought me a copy of it shortly after it came out. Q. Did Mr. Parlato ever work for NXIVM? A. I don't think that he did. Q. Was he ever a paid consultant? A. I don't believe that we ever paid him. Q. Have you ever spoken to Mr. Parlato about Rick Ross? A. I think I did.	5 6 7 8 9 10 11 12 13 14 15	A. I think the phone rings in our accounting office. Q. Who would be there? Let me back this up. I'll give you a time frame. In fall of 2007, whose phone was that? A. The administrative offices will answer the phone. Q. Is that any particular person? A. A series of people. Q. Are any of them authorized to respond to inquiries from the press?
6 7 8 9 10 11 12 13 14 15	A. I believe that Kristin Keeffe brought me a copy of it shortly after it came out. Q. Did Mr. Parlato ever work for NXIVM? A. I don't think that he did. Q. Was he ever a paid consultant? A. I don't believe that we ever paid him. Q. Have you ever spoken to Mr. Parlato about Rick Ross? A. I think I did. Q. How many times?	5 6 7 8 9 10 11 12 13 14 15	A. I think the phone rings in our accounting office. Q. Who would be there? Let me back this up. I'll give you a time frame. In fall of 2007, whose phone was that? A. The administrative offices will answer the phone. Q. Is that any particular person? A. A series of people. Q. Are any of them authorized to respond to inquiries from the press? A. No.
6 7 8 9 10 11 12 13 14 15 16 17	A. I believe that Kristin Keeffe brought me a copy of it shortly after it came out. Q. Did Mr. Parlato ever work for NXIVM? A. I don't think that he did. Q. Was he ever a paid consultant? A. I don't believe that we ever paid him. Q. Have you ever spoken to Mr. Parlato about Rick Ross? A. I think I did. Q. How many times? A. I didn't speak to him many times,	5 6 7 8 9 10 11 12 13 14 15 16	A. I think the phone rings in our accounting office. Q. Who would be there? Let me back this up. I'll give you a time frame. In fall of 2007, whose phone was that? A. The administrative offices will answer the phone. Q. Is that any particular person? A. A series of people. Q. Are any of them authorized to respond to inquiries from the press? A. No. Q. So, is there any procedure for what
6 7 8 9 10 11 12 13 14 15 16 17	A. I believe that Kristin Keeffe brought me a copy of it shortly after it came out. Q. Did Mr. Parlato ever work for NXIVM? A. I don't think that he did. Q. Was he ever a paid consultant? A. I don't believe that we ever paid him. Q. Have you ever spoken to Mr. Parlato about Rick Ross? A. I think I did. Q. How many times? A. I didn't speak to him many times, maybe three or four in total. I think only once.	5 6 7 8 9 10 11 12 13 14 15 16 17	A. I think the phone rings in our accounting office. Q. Who would be there? Let me back this up. I'll give you a time frame. In fall of 2007, whose phone was that? A. The administrative offices will answer the phone. Q. Is that any particular person? A. A series of people. Q. Are any of them authorized to respond to inquiries from the press? A. No. Q. So, is there any procedure for what is to be done if that phone receives an
6 7 8 9 10 11 12 13 14 15 16 17 18	A. I believe that Kristin Keeffe brought me a copy of it shortly after it came out. Q. Did Mr. Parlato ever work for NXIVM? A. I don't think that he did. Q. Was he ever a paid consultant? A. I don't believe that we ever paid him. Q. Have you ever spoken to Mr. Parlato about Rick Ross? A. I think I did. Q. How many times? A. I didn't speak to him many times, maybe three or four in total. I think only once. Q. And what did you discuss?	5 6 7 8 9 10 11 12 13 14 15 16 17 18	A. I think the phone rings in our accounting office. Q. Who would be there? Let me back this up. I'll give you a time frame. In fall of 2007, whose phone was that? A. The administrative offices will answer the phone. Q. Is that any particular person? A. A series of people. Q. Are any of them authorized to respond to inquiries from the press? A. No. Q. So, is there any procedure for what is to be done if that phone receives an unsolicited inquiry from the press?
6 7 8 9 10 11 12 13 14 15 16 17 18 19 20	A. I believe that Kristin Keeffe brought me a copy of it shortly after it came out. Q. Did Mr. Parlato ever work for NXIVM? A. I don't think that he did. Q. Was he ever a paid consultant? A. I don't believe that we ever paid him. Q. Have you ever spoken to Mr. Parlato about Rick Ross? A. I think I did. Q. How many times? A. I didn't speak to him many times, maybe three or four in total. I think only once. Q. And what did you discuss? A. I discussed the problems that we	5 6 7 8 9 10 11 12 13 14 15 16 17 18 19 20	A. I think the phone rings in our accounting office. Q. Who would be there? Let me back this up. I'll give you a time frame. In fall of 2007, whose phone was that? A. The administrative offices will answer the phone. Q. Is that any particular person? A. A series of people. Q. Are any of them authorized to respond to inquiries from the press? A. No. Q. So, is there any procedure for what is to be done if that phone receives an unsolicited inquiry from the press? A. They would either advise legal or
6 7 8 9 10 11 12 13 14 15 16 17 18	A. I believe that Kristin Keeffe brought me a copy of it shortly after it came out. Q. Did Mr. Parlato ever work for NXIVM? A. I don't think that he did. Q. Was he ever a paid consultant? A. I don't believe that we ever paid him. Q. Have you ever spoken to Mr. Parlato about Rick Ross? A. I think I did. Q. How many times? A. I didn't speak to him many times, maybe three or four in total. I think only once. Q. And what did you discuss? A. I discussed the problems that we had with the media, with the Internet; mainly our	5 6 7 8 9 10 11 12 13 14 15 16 17 18	A. I think the phone rings in our accounting office. Q. Who would be there? Let me back this up. I'll give you a time frame. In fall of 2007, whose phone was that? A. The administrative offices will answer the phone. Q. Is that any particular person? A. A series of people. Q. Are any of them authorized to respond to inquiries from the press? A. No. Q. So, is there any procedure for what is to be done if that phone receives an unsolicited inquiry from the press? A. They would either advise legal or they advise me.
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SALZMAN - DAY I going to direct your attention specifically to the pages marked Interfor 0452 and 0453. I realize this is, unfortunately, in fairly small type. A. Okay. G. O. Im going to read a couple of the statements from here and then I'll ask you a series of questions. Starting at the bottom of page 452, the last paragraph states: "According to NXIVM spokesperson Robertson, company leaders were appalled to learn what Aviv was up to." Do you know what that refers to? MR. MC GUIRE: Don't guess. If you know, you can answer. A. No. Q. Continuing on to the following page, I'll like you to read the first full paragraph that starts "Robertson says that NXIVM" to yourself. Then I'll ask you a question or two. A. I don't know how - I was never there are a number of statements attributed to Robertson? Did you ever discuss any of those Page 86 SALZMAN - DAY I SALZMAN - DA		Page 85		Page 87
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	Page 89		Page 91
1	SALZMAN - DAY I	1	SALZMAN - DAY I
2	Slightly further on in that	2	MR. MC GUIRE: You mean any time?
3	paragraph there's the statement:	3	MR. LANDY: Any time.
4	"What we saw was a corrupt attorney	4	A. No. I didn't have that many direct
5	hires a corrupt private investigator."	5	discussions with people at Interfor.
6	At the time, was it NXIVM's	6	Q. Did anyone at NXIVM?
7	position that Interfor was a corrupt private	7	A. Object?
8	investigator?	8	Q. Yes.
9	MR. MC GUIRE: Could I have read	9	A. I don't know.
10	that back, please?	10	Q. When was the last time you spoke to
11	(The requested portion of the	11	anyone at Interfor?
12	record was read.)	12	A. May of 2005.
13	A. Was it NXIVM's position?	13	Q. Who did you speak to?
14	Q. Yes.	14	A. It may have been Anna Moody. I
15	A. I never said that. I don't think	15	don't remember. I remember going to a meeting at
16	NXIVM ever said that. I think that was his	16	the end where I don't think Juval Aviv was there.
17	opinion.	17	Q. Did you discuss the Ross
18	Q. And by "his," you mean Frank	18	investigation at that meeting?
19	Parlato?	19	A. I don't remember.
20	A. Yes.	20	Q. When you first saw "The Village
21	(Recess taken.)	21	Voice" article, which is NXIVM Exhibit 14, did it
22	THE WITNESS: I wanted to clarify a	22	concern you?
23	point. And the point was that when Kristin	23	A. Yes.
24	Keeffe agreed to give Juval Aviv information	24	Q. Why?
25	that she had, I don't know what the	25	A. I thought it was terrible. I
	Page 90		Page 92
1	SALZMAN - DAY I	1	SALZMAN - DAY I
2	information was about, and I didn't at the	2	thought what was said I thought the whole
3	time either. They seemed to know what they	3	article was horrible, but I thought that somebody
4	were both talking about.	4	claiming to be somebody named Phil Robertson was
5	Q. So, to be clear, Ms. Salzman, is it	5	terrible, and I thought the things that he said
6	you testimony that while at a meeting in	6	that represented us were terrible. And the fact
7	Interfor's offices, Ms. Keeffe offered to give	7	that he represented us I was very disturbed about.
8	some information to Mr. Aviv some information	8	Q. Did you discuss those concerns with
9	to Mr. Aviv, but the nature of the information was	9	anybody?
10	not discussed?	10	A. I think I discussed them with
11	A. Yes. It appeared that they both	11	Kristin. And I am pretty sure I discussed them
12	knew what they were talking about, and they agreed	12	with Frank Parlato.
13	that she would give it to him. So, I assumed that	13	Q. But you don't recall whether
14	they had had previous discussions about this,	14	Kristin told you that she knew the article would
15	whatever it was.	15	come out in advance?
16	Q. When you say "they," do you mean	16	A. I'm sorry, but I don't remember
17	Kristin Keeffe and Juval Aviv?	17	what she told me about "advance."
18	A. Yes.	18	MR. LANDY: All right. Reserving
19	Q. Who made the ultimate decision to	19	my right to any cross-examination that may be
20	hire Interfor?	20	necessary, I'm through. No more further
21	A. I did.	21	questions. Thank you very much for your time.
22	Q. Did you ever have any	22	EXAMINATION BY MR. KOFMAN:
23	communications with anyone at Interfor wherein you	23	Q. Ms. Salzman, my name is Harold
24			
25	objected to something you learned that they had done?	24 25	Kofman. I'm an attorney at Riker Danzig Scherer Hyland & Peretti. And we represent Morris Sutton,

Page 93 Page 95 1 1 SALZMAN - DAY I SALZMAN - DAY I 2 2 Rochelle Sutton, and Stephanie Franco in this MR. SKOLNIK: I have no problem 3 3 litigation. disclosing who is paying my legal fees. 4 The instructions that Mr. Landy 4 MR. MC GUIRE: All of them? 5 gave you this morning are still operative. Again, 5 MR. SKOLNIK: All of them. if you need a break, please let me know. Just a 6 6 MR. LANDY: I don't have an 7 follow up on a couple of things that you and 7 objection. 8 Mr. Landy discussed. 8 MR. MC GUIRE: Do you mind if I 9 9 Did you ever authorize Frank speak with the witness just for a second? 10 10 Parlato to communicate settlement discussions with MR. KOFMAN: Sure. the Sutton/Franco lawyers? Strike that. 11 11 (Discussion off the record.) 12 Did NXIVM ever authorize Frank 12 Q. Ms. Salzman, during the break we 13 Parlato to discuss settlement of this litigation 13 just had, did you consult with anyone about my 14 on its behalf? 14 question? 15 A. I don't remember. 15 A. I did. 16 O. It might have? 16 Q. Who did you consult with? 17 A. There was a period of time -- I 17 A. Clare Bronfman. 18 18 Okay. Did you speak to Keith don't remember. 0. 19 Q. Was there a period of time in which 19 Raniere? 20 Mr. Parlato was authorized to speak on behalf of 20 A. No. 21 21 NXIVM? Q. Okay. Did NXIVM ask Ms. Bronfman 2.2 A. There was a period of time when he 2.2 to hire Frank Parlato? 23 was consulting with us, as I said, when he was 23 A. No. 24 hired by Clare Bronfman. He was working with 24 Q. Has Ms. Bronfman paid other 25 Kristin Keeffe at that time, and I had a few 25 expenses of NXIVM? Page 94 Page 96 1 1 SALZMAN - DAY I SALZMAN - DAY I 2 2 limited conversations with him. MR. MC GUIRE: Don't answer that 3 3 question just yet. I don't remember authorizing him to 4 MR. KOFMAN: Okay. 4 have settlement discussions, and I don't remember 5 whether he was consulting with our attorneys, but 5 Q. After you read "The Village Voice" 6 б that seems like something our attorneys would article, you indicated that you were concerned 7 about statements -- with the statements attributed 7 handle. 8 Q. Do you know how much Ms. Bronfman 8 to Phil Robertson a/k/a Frank Parlato. 9 paid to Mr. Parlato? 9 Did you express that concern to 10 10 Mr. Parlato? A. I don't. 11 Q. Has Ms. Bronfman paid any of the 11 A. I did. 12 12 legal fees for NXIVM in this litigation? Q. What did you tell him? 13 13 A. That I didn't agree with the things MR. MC GUIRE: Don't answer that 14 14 that he said, and I didn't agree that that question. 15 MR. KOFMAN: Why not? 15 represented NXIVM's points of view, and that I didn't want him doing that anymore. 16 MR. MC GUIRE: It's totally 16 17 Q. When you said you "didn't want him 17 irrelevant. I'll tell you what? Are we going 18 doing it anymore," what do you mean? 18 to find out who is paying your legal fees and 19 any legal fees for anybody else in the case? 19 A. I wanted him to discuss with me, in 20 I don't want to hear objections from other 20 advance of discussing anything with anyone, that 21 people. 21 would go in the press. 22 22 MR. KOFMAN: We know that Michael Q. Do you remember a settlement 23 conference that took place down the street in 23 Sutton paid for, it goes to credibility. We 24 know that Ms. Bronfman might be a witness in 24 Newark before Magistrate Judge Falk in December of 25 25 2007? this case.

Page 97 Page 99 1 SALZMAN - DAY I 1 SALZMAN - DAY I 2 2 A. I do remember that. O. What did he take on by himself that 3 3 Q. Do you remember that you were there he did not advise you about? 4 and Keith Raniere? 4 A. Well, this article, for one thing. 5 5 Almost everything he participated in he was very A. Yes. Q. Was Mr. Parlato also there? 6 6 independent in his action. 7 7 Q. What were some of the other things A. He may have been. 8 Q. Okay. Was Mr. Parlato authorized 8 he participated in? 9 9 by NXIVM to be there on its behalf? A. He participated in -- well, the 10 10 MR. MC GUIRE: Object to the form other thing that he did was he agreed to do a public relations campaign for us, including 11 11 of the question. 12 Q. Did Mr. Parlato appear on NXIVM's 12 developing a website, doing a series of writing 13 behalf at that conference? 13 projects, and making sure that he changed our 14 A. I believe he did come to that 14 image on the Internet. And he never followed 15 conference. 15 through on those things. 16 16 He started a number of things, Q. Was he authorized by NXIVM to be 17 there? 17 never did the writing projects, never did the job, 18 18 and then became involved or tried to become A. I think he came with us, yes. 19 O. When did NXIVM's relationship with 19 involved in things that I didn't ask him to be 20 20 involved in, in the company. Mr. Parlato end? 21 21 MR. MC GUIRE: Object to the form Q. Such as? 22 22 A. There was a project that I was of that question. 23 MR. KOFMAN: Strike that. 23 involved in, in California, that I didn't ask him 24 O. Did NXIVM ever sever its 24 to consult in, and he decided to consult in 25 relationship with Mr. Parlato? 25 that -- he decided he wanted to participate in Page 98 Page 100 1 1 SALZMAN - DAY I SALZMAN - DAY I 2 2 A. Yes. that. He discussed that with other members of the 3 3 Q. When was that? team, and then also with Clare Bronfman. 4 4 A. I believe it was early -- I'm And then he began to work with 5 trying to remember the date of this article. 5 Clare more directly. And I think while he was 6 Early in 2008. 6 doing those things, both she and I both had 7 7 Q. What were the circumstances under similar experiences, and he wasn't following 8 which the relationship with Mr. Parlato ended? 8 through on the things that I had asked him to do 9 A. There were a series of things that 9 for the website, and that was what I hired him to 10 occurred. Mr. Parlato was very independent in the 10 do. And he wasn't doing that at all. And so, we 11 way that he did things, and we had many 11 just ended our relationship. differences of opinion, and I couldn't work with 12 12 O. What was the California project? 13 What did that involve? 13 him any longer. 14 Q. What were the things that -- strike 14 A. It involved real estate. 15 15 O. Were there any other instances that. 16 Was one of the reasons the article 16 besides the article in the California project 17 17 that appeared in "The Village Voice"? where he tried to get involved in things without 18 A. Among other things. 18 authorization? Q. What were some of the other things? 19 19 A. It was my understanding that he 20 A. The fact that he was very 20 tried to get involved in just about every area of

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manage.

Q.

independent and didn't work as a team member. He

was sort of an independent force. He took things

on himself. He didn't advise me of what he was

doing and he didn't follow what it was that I

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wanted done.

the company. He wanted to help us -- changing our

of the company for Frank, and he -- he was hard to

public image extended to a lot of different areas

Did he ever undertake an

Page 101 Page 103 1 1 SALZMAN - DAY I SALZMAN - DAY I 2 2 investigation of the Suttons? different. 3 3 A. I don't know. I can't remember him MR. LANDY: Communications that 4 taking -- I can't remember that off the top of my 4 anyone at NXIVM had with the agent of an 5 5 head now. attorney that was hired by the attorney to 6 O. Did he ever undertake an 6 assist in the litigation would be covered by 7 7 investigation of Stephanie Franco? the privilege. 8 A. I'm not remembering that. 8 To the extent that it's not covered 9 Q. Did NXIVM ever hire anyone to 9 by the Treece opinion, that's because the 10 undertake an investigation of the Suttons? 10 Treece opinion only covers what is not A. I don't know if Mr. Aviv did that. 11 11 privileged, not what is privileged. 12 I'm not sure. 12 MR. KOFMAN: Well, I think what 13 I do remember that -- I don't know 13 we're talking about here is the work product 14 if Michael told me things about his family. I 14 privilege, not an attorney/client privilege. 15 don't think we did. 15 And the first thing is whether or not there is 16 Q. Did Interfor ever investigate the 16 any investigation is not covered. If we get 17 Suttons? 17 into a question about the substance, then you 18 18 MR. LANDY: Objection. We're now might have a point there. 19 going to a point that's beyond the stipulation 19 MR. LANDY: In the end, this is a 20 concerning what is and what is not privileged. 20 privilege that belongs to NXIVM. So, to the Judge Treece's opinion allows for questions to 21 21 extent that it's going to be asserted, it will. I believe I've made a sufficient be asked concerning Interfor's work on behalf 22 22 of NXIVM with respect to the Ross 23 23 record. 24 24 MR. MC GUIRE: Mr. Kofman, I will investigation. allow the witness to answer the question yes 25 It's fairly clear that any other 25 Page 102 Page 104 1 1 SALZMAN - DAY I SALZMAN - DAY I 2 or no. Beyond that, I will impose the work 2 investigations it does not touch. And I 3 3 understand that to be the nature of the product privilege. stipulation we all agreed to. 4 4 MR. KOFMAN: Okay. Can you read 5 5 back the question, please? MR. SKOLNIK: This has nothing to do with O'Hara, or conversations with any 6 (The requested portion of the 6 7 7 alleged attorney. This is Nancy Salzman's record was read.) 8 personal knowledge of investigations of the 8 A. Not to the best of my knowledge. I Sutton family. 9 don't remember him doing that. I don't remember 9 10 ever getting a report on that. 10 MR. LANDY: To the extent that 11 Q. And would the same answer be true 11 there's any privilege, it's NXIVM's and 12 Mr. McGuire's. But if an attorney 12 for Ms. Franco? 13 13 representing NXIVM hired an investigator to To the best of my knowledge, I assist it in connection with the litigation, 14 don't ever remember asking for that or getting a 14 15 it's privileged. Of course, it's yours to 15 report on that. 16 16 Q. Did NXIVM ever ask any private assert. 17 17 MR. KOFMAN: Well, I think that investigator to investigate the Suttons or Ms. Franco? 18 Judge Treece's opinion -- I'd agree that only 18 19 goes to communications involving O'Hara, that 19 A. No. that is an area -- I don't think this -- you 20 20 Q. You mentioned, during questioning 21 know, if there was an investigation that was 21 by Mr. Landy, Kristin Snyder. Can you tell me who 22 22 done, which we don't know if there was, I Ms. Snyder is? 23 23 don't see what privilege attaches to that. A. She's a young woman who lived in 24 24 Anchorage, Alaska who came and took training with Now, any communications involving 25 25 an attorney in that investigation may be us at a seminar in Alaska, a five-day seminar.

Page 105 Page 107 1 1 SALZMAN - DAY I SALZMAN - DAY I 2 2 And then I think she took an 11-day seminar after MR. SKOLNIK: Nor I. 3 3 that. And then I believe she began repeating that O. What did Ms. Bronfman tell you? 4 program about a year later, also in Anchorage, 4 A. She's never paid for any of my 5 5 Alaska, and she disappeared during that training. legal bills. 6 6 Did she ever take training in Q. How much did she pay Mr. Parlato? 7 7 Albany? A. I didn't ask her that. 8 8 A. She visited Albany, but I don't O. That wasn't the question. That was 9 believe she took training there. I believe she 9 one of the questions pending. 10 10 was there during the training, but she wasn't a A. I'm sorry. I didn't ask her how 11 student in that training. 11 much she paid him. 12 O. Did you meet her? 12 Q. Has she paid other expenses of 13 A. I did. 13 NXIVM? 14 14 Q. Did her disappearance generate A. No. 15 newspaper articles in Alaska and Albany? 15 Q. Do you recall Mr. Raniere 16 A. At the time of her disappearance, I 16 testifying, several weeks ago, about a trip that 17 believe that there were newspaper articles, and 17 you and he and some others took to Dharmala to 18 then a year later, an article surfaced in Albany. 18 India to see the Dalai Lama? 19 (Recess taken.) 19 A. Dharamsala? 20 Q. Ms. Salzman, just to close the 20 O. Dharamsala. 21 A. Yes. 21 loop, when you said that articles appeared at the 22 time of her disappearance, those were articles in 22 Q. Who paid for that trip? 23 the press in Alaska? 23 A. I believe Sara Bronfman did. 24 A. Correct. 24 Okay. Has Sara Bronfman paid for Q. 25 Okay. Have you spoken to 25 expenses of NXIVM? Page 106 Page 108 1 1 SALZMAN - DAY I SALZMAN - DAY I 2 Ms. Bronfman about the issue that we discussed 2 MR. MC GUIRE: Well, I'm going to 3 3 earlier, the payment of expenses for NXIVM? object now because it's a matter of personal 4 4 A. I have. privilege on her part. And nobody has asked 5 5 her whether -- that question has not been Q. And what did Ms. Bronfman say? MR. MC GUIRE: Now, I want you to 6 directed to her. Your question was directed 6 7 understand if this opens the door for me to 7 to Clare. If you want, we'll clear that with 8 ask questions -- I don't want to be confronted 8 her this evening. 9 9 by -- if I ask Mr. Ross or Mr. Sutton or MR. KOFMAN: We can get back into 10 it this evening, or tomorrow rather. 10 anybody else about payment of expenses. MR. KOFMAN: Okay. 11 (Exhibit Salzman 15 and 16 marked 11 12 MR. MC GUIRE: Is everybody in 12 for identification.) 13 agreement with that? Because, otherwise, I'm 13 Q. Ms. Salzman, do you recognize Salzman 15 and Salzman 16? 14 14 not going to have this witness answer that question. I don't want to be confronted with 15 15 A. Yes. an objection from Mr. Skolnick. I don't think 16 MR. KOFMAN: Okay. For the record, 16 17 17 it'll go to Mr. Landy, but it might go to your these are -- Salzman 15 is a notice of clients. And I don't want to hear objections. 18 deposition of NXIVM Corporation pursuant to 18 19 If you're going to object to that 19 Federal Rule of Civil Procedure 30(b)(6), and Salzman 16 is amended notice of deposition of 20 question, let me know right now. What's good 20 21 for the goose is good for the gander. 21 First Principles, Inc. pursuant to Federal 22 22 MR. LANDY: I'm not going to Rule of Civil Procedure 30(b)(6). 23 object. 23 Q. Ms. Salzman, has NXIVM designated 24 24 MR. KOFMAN: I'm not going to you to testify concerning the matters listed in 25 25 Salzman 15 and 16? object.

Page 109 Page 111 1 1 SALZMAN - DAY I SALZMAN - DAY I 2 2 A. Yes. extra day, today, tomorrow and Wednesday. But 3 3 I'm not going to have Ms. Salzman repeat MR. MC GUIRE: There was a everything that Ms. Keeffe testified to during 4 deposition of Ms. Keeffe, in which many of 4 5 her 30(b)(6), or the substantive one, where 5 these subject matters were handled by 6 you participated and you had her for quite a 6 Ms. Keeffe. It was 11 and 12 of Mr. Skolnik's notice, but you had the opportunity to examine 7 while. 7 8 8 her. I think you did, in fact, cross-examine MR. KOFMAN: Bill, that's plain 9 incorrect. First of all, her 30(b)(6) as to 9 Ms. Keeffe and some of the subject matters in 10 the Ross defendants, and as to me, only 10 these -- the one I'm looking at now, I don't have my notes on it here, my recollection is 11 concern documents, her role as custodian of 11 12 that you examined Ms. Keeffe on a number of 12 documents. 13 these issues. 13 Are you telling me that if I take a 14 fact witness' deposition, that I can't also 14 MR. KOFMAN: That's incorrect. 15 have somebody who binds the corporation? 15 Ms. Keeffe was identified -- we served a 16 MR. MC GUIRE: No. 16 document 30(b)(6) relating only to document issues. Ms. Keeffe was designated by the 17 17 MR. KOFMAN: Ms. Keeffe was never company as to testify as to those matters, 18 18 designate to bind the corporation. As a 19 nothing as to substantive. 19 matter of fact, I only had about an hour and a 20 She had two depositions, one a 2.0 half of substantive, and we're going to finish 30(b)(6) on documents, one substantive where 21 hers. However, nobody has ever been 21 22 she was not designated for any purpose. This 22 designated by the corporation to testify as to 23 is completely separate. These are notices 23 the matters in Salzman 15 and 16. 24 directed to the substance, not documents. 24 MR. MC GUIRE: Because most, if not MR. MC GUIRE: You went into the 25 25 all, of the subsections were subsumed in the Page 110 Page 112 1 1 SALZMAN - DAY I SALZMAN - DAY I 2 2 substance of these things with her. Lowenstein notice. MR. KOFMAN: Not her 30(b)(6). And 3 3 MR. KOFMAN: They were not. 4 4 MR. MC GUIRE: Let me get the she was not designated by the company. And as 5 you recall, I did not complete her deposition. 5 Lowenstein notice. But go ahead, ask your MR. MC GUIRE: I understand you 6 questions. I may not have the objections to 6 7 them. But let the record show that if there 7 didn't complete her deposition, but you're not 8 going to have it both ways. You're not going 8 is duplication in these things which prolongs 9 to call Keeffe back on 30(b)(6) issues that 9 the Salzman deposition, I will object at the were raised when Mr. Skolnik or Mr. Norwick. 10 right time. But go ahead. 10 It was Mr. Norwick, wasn't it, Peter? 11 Q. Ms. Salzman, is it the intention of 11 12 MR. SKOLNIK: Yes. 12 NXIVM's First Principles that they suffered damages as a result of the actions of my clients, 13 MR. MC GUIRE: Conducted an 13 14 extensive examination of Ms. Keeffe on those 14 Morris and Rochelle Sutton and Stephanie Franco? 15 issues. I think they were 12 paragraphs in 15 Yes. Α. 16 Mr. Skolnik's or the Lowenstein notice. And 16 Q. And is it the content of First of those 12 subjects, a goodly number of these 17 17 Principles that it suffered damages as a result of were exactly the same. And Ms. Keeffe the actions of Morris and Rochelle Sutton and 18 18 19 testified whether the 30(b)(6) or a 19 Stephanie Franco? substantive deposition, or I think both, about 20 A. Yes. 20 21 those issues. 21 Q. Please tell me all types of financial harm that NXIVM and First Principles 22 So, you went into many of those. 22 And I'm not going to sit here and have you go 23 have suffered as a result of my clients -- what 23 through them again with Ms. Salzman because 24 you contend are my clients' actions. 2.4 25 Ms. Salzman is here. We've given you one 25 The damages that were served in the

	Page 113		Page 115
1	SALZMAN - DAY I	1	SALZMAN - DAY I
2	original papers, A, B and C Exhibits A, B and	2	Q. What other firm have you hired?
3	C, would document all of that.	3	
4	Q. Is there any other type of	3 4	MR. MC GUIRE: I object. That's
	- 1	5	improper. I object to that. That would be
5	financial harm other than what's listed in A, B,	5 6	the subject of expert disclosures.
6	and C that you're claiming?	7	MR. KOFMAN: Mark this please as
7	A. Well, that's what we've claimed in		Salzman 18.
8	this lawsuit up to date up until when those	8 9	(Exhibit Salzman 18 marked for
9 10	papers were served.		identification.)
	Q. Okay.	10	MR. MC GUIRE: Is this a document
11	(Exhibit Salzman 17 marked for	11 12	that's been previously identified?
12	identification.)		MR. KOFMAN: Excuse me?
13	MR. KOFMAN: For the record,	13	MR. MC GUIRE: Was this a document
14	Salzman 17 is a letter the first page is a	14	that has previously been identified by anybody
15	letter dated August 26th, 2005 from Michael	15	in this case?
16	Quinn to Anthony Sylvester and Thomas Gleason.	16	MR. KOFMAN: No.
17	And attached to that are several pages of	17	MR. MC GUIRE: Where did it come
18	documents.	18	from?
19	Q. Ms. Salzman, do you recognize the	19	MR. KOFMAN: It's got your Bates
20	document that we've marked as Salzman 17?	20	Stamp number on it.
21	A. I do.	21	MR. MC GUIRE: Oh, I beg your
22	Q. What is Salzman 17?	22	pardon. I missed that on the left.
23	A. It is the Exhibit A, B, and C that	23	MR. KOFMAN: For the record,
24	outline the losses that we've incurred as a result	24	Ms. Salzman, what we've marked as Salzman 18
25	of this lawsuit.	25	is identified by Bates Stamp Nos. SP-2302
	Page 114		Page 116
	3-		rage 110
1	SALZMAN - DAY I	1	SALZMAN - DAY I
2		1 2	
	SALZMAN - DAY I		SALZMAN - DAY I
2	SALZMAN - DAY I Q. Okay. Can you tell me what Exhibit	2	SALZMAN - DAY I through SP-2309. It's a document that was
2 3	SALZMAN - DAY I Q. Okay. Can you tell me what Exhibit A represents?	2 3	SALZMAN - DAY I through SP-2309. It's a document that was produced to us in discovery in July 2008 by
2 3 4	SALZMAN - DAY I Q. Okay. Can you tell me what Exhibit A represents? A. Loss of existing clients.	2 3 4	SALZMAN - DAY I through SP-2309. It's a document that was produced to us in discovery in July 2008 by your counsel.
2 3 4 5	SALZMAN - DAY I Q. Okay. Can you tell me what Exhibit A represents? A. Loss of existing clients. Q. Those were people who were existing	2 3 4 5	SALZMAN - DAY I through SP-2309. It's a document that was produced to us in discovery in July 2008 by your counsel. Q. Do you recognize this document?
2 3 4 5 6	SALZMAN - DAY I Q. Okay. Can you tell me what Exhibit A represents? A. Loss of existing clients. Q. Those were people who were existing clients of NXIVM who stopped taking classes	2 3 4 5 6	SALZMAN - DAY I through SP-2309. It's a document that was produced to us in discovery in July 2008 by your counsel. Q. Do you recognize this document? A. You know what? I don't.
2 3 4 5 6 7	SALZMAN - DAY I Q. Okay. Can you tell me what Exhibit A represents? A. Loss of existing clients. Q. Those were people who were existing clients of NXIVM who stopped taking classes because of the actions alleged?	2 3 4 5 6 7	SALZMAN - DAY I through SP-2309. It's a document that was produced to us in discovery in July 2008 by your counsel. Q. Do you recognize this document? A. You know what? I don't. Q. Do you know what this document
2 3 4 5 6 7 8	SALZMAN - DAY I Q. Okay. Can you tell me what Exhibit A represents? A. Loss of existing clients. Q. Those were people who were existing clients of NXIVM who stopped taking classes because of the actions alleged? A. That's correct. Q. What is Exhibit B?	2 3 4 5 6 7 8	SALZMAN - DAY I through SP-2309. It's a document that was produced to us in discovery in July 2008 by your counsel. Q. Do you recognize this document? A. You know what? I don't. Q. Do you know what this document represents?
2 3 4 5 6 7 8 9	SALZMAN - DAY I Q. Okay. Can you tell me what Exhibit A represents? A. Loss of existing clients. Q. Those were people who were existing clients of NXIVM who stopped taking classes because of the actions alleged? A. That's correct. Q. What is Exhibit B?	2 3 4 5 6 7 8 9	SALZMAN - DAY I through SP-2309. It's a document that was produced to us in discovery in July 2008 by your counsel. Q. Do you recognize this document? A. You know what? I don't. Q. Do you know what this document represents? A. It appears to be a list of people
2 3 4 5 6 7 8 9	SALZMAN - DAY I Q. Okay. Can you tell me what Exhibit A represents? A. Loss of existing clients. Q. Those were people who were existing clients of NXIVM who stopped taking classes because of the actions alleged? A. That's correct. Q. What is Exhibit B? A. That's a class of perspective	2 3 4 5 6 7 8 9	SALZMAN - DAY I through SP-2309. It's a document that was produced to us in discovery in July 2008 by your counsel. Q. Do you recognize this document? A. You know what? I don't. Q. Do you know what this document represents? A. It appears to be a list of people who are reported in the company who have cancelled
2 3 4 5 6 7 8 9 10	SALZMAN - DAY I Q. Okay. Can you tell me what Exhibit A represents? A. Loss of existing clients. Q. Those were people who were existing clients of NXIVM who stopped taking classes because of the actions alleged? A. That's correct. Q. What is Exhibit B? A. That's a class of perspective clients.	2 3 4 5 6 7 8 9 10	SALZMAN - DAY I through SP-2309. It's a document that was produced to us in discovery in July 2008 by your counsel. Q. Do you recognize this document? A. You know what? I don't. Q. Do you know what this document represents? A. It appears to be a list of people who are reported in the company who have cancelled their enrollment or have not come in because of
2 3 4 5 6 7 8 9 10 11	SALZMAN - DAY I Q. Okay. Can you tell me what Exhibit A represents? A. Loss of existing clients. Q. Those were people who were existing clients of NXIVM who stopped taking classes because of the actions alleged? A. That's correct. Q. What is Exhibit B? A. That's a class of perspective clients. Q. And what are those? A. Those are clients who would have	2 3 4 5 6 7 8 9 10 11	SALZMAN - DAY I through SP-2309. It's a document that was produced to us in discovery in July 2008 by your counsel. Q. Do you recognize this document? A. You know what? I don't. Q. Do you know what this document represents? A. It appears to be a list of people who are reported in the company who have cancelled their enrollment or have not come in because of these same issues.
2 3 4 5 6 7 8 9 10 11 12 13	SALZMAN - DAY I Q. Okay. Can you tell me what Exhibit A represents? A. Loss of existing clients. Q. Those were people who were existing clients of NXIVM who stopped taking classes because of the actions alleged? A. That's correct. Q. What is Exhibit B? A. That's a class of perspective clients. Q. And what are those? A. Those are clients who would have taken the program had it not been for the the	2 3 4 5 6 7 8 9 10 11 12 13	SALZMAN - DAY I through SP-2309. It's a document that was produced to us in discovery in July 2008 by your counsel. Q. Do you recognize this document? A. You know what? I don't. Q. Do you know what this document represents? A. It appears to be a list of people who are reported in the company who have cancelled their enrollment or have not come in because of these same issues. Q. Do you know whether this was
2 3 4 5 6 7 8 9 10 11 12 13	SALZMAN - DAY I Q. Okay. Can you tell me what Exhibit A represents? A. Loss of existing clients. Q. Those were people who were existing clients of NXIVM who stopped taking classes because of the actions alleged? A. That's correct. Q. What is Exhibit B? A. That's a class of perspective clients. Q. And what are those? A. Those are clients who would have taken the program had it not been for the the events that occurred concerning this lawsuit.	2 3 4 5 6 7 8 9 10 11 12 13 14	SALZMAN - DAY I through SP-2309. It's a document that was produced to us in discovery in July 2008 by your counsel. Q. Do you recognize this document? A. You know what? I don't. Q. Do you know what this document represents? A. It appears to be a list of people who are reported in the company who have cancelled their enrollment or have not come in because of these same issues. Q. Do you know whether this was intended to supplement Exhibits A, B and C?
2 3 4 5 6 7 8 9 10 11 12 13 14 15	SALZMAN - DAY I Q. Okay. Can you tell me what Exhibit A represents? A. Loss of existing clients. Q. Those were people who were existing clients of NXIVM who stopped taking classes because of the actions alleged? A. That's correct. Q. What is Exhibit B? A. That's a class of perspective clients. Q. And what are those? A. Those are clients who would have taken the program had it not been for the the events that occurred concerning this lawsuit. Q. And what is Exhibit C?	2 3 4 5 6 7 8 9 10 11 12 13 14 15	SALZMAN - DAY I through SP-2309. It's a document that was produced to us in discovery in July 2008 by your counsel. Q. Do you recognize this document? A. You know what? I don't. Q. Do you know what this document represents? A. It appears to be a list of people who are reported in the company who have cancelled their enrollment or have not come in because of these same issues. Q. Do you know whether this was intended to supplement Exhibits A, B and C? A. I imagine that it was. Q. Does Salzman 17 and Salzman 18
2 3 4 5 6 7 8 9 10 11 12 13 14 15 16	SALZMAN - DAY I Q. Okay. Can you tell me what Exhibit A represents? A. Loss of existing clients. Q. Those were people who were existing clients of NXIVM who stopped taking classes because of the actions alleged? A. That's correct. Q. What is Exhibit B? A. That's a class of perspective clients. Q. And what are those? A. Those are clients who would have taken the program had it not been for the the events that occurred concerning this lawsuit. Q. And what is Exhibit C? A. They are individuals of	2 3 4 5 6 7 8 9 10 11 12 13 14 15 16	SALZMAN - DAY I through SP-2309. It's a document that was produced to us in discovery in July 2008 by your counsel. Q. Do you recognize this document? A. You know what? I don't. Q. Do you know what this document represents? A. It appears to be a list of people who are reported in the company who have cancelled their enrollment or have not come in because of these same issues. Q. Do you know whether this was intended to supplement Exhibits A, B and C? A. I imagine that it was. Q. Does Salzman 17 and Salzman 18 constitute the entire universe of people who
2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18	SALZMAN - DAY I Q. Okay. Can you tell me what Exhibit A represents? A. Loss of existing clients. Q. Those were people who were existing clients of NXIVM who stopped taking classes because of the actions alleged? A. That's correct. Q. What is Exhibit B? A. That's a class of perspective clients. Q. And what are those? A. Those are clients who would have taken the program had it not been for the the events that occurred concerning this lawsuit. Q. And what is Exhibit C? A. They are individuals of professional firms that have refused to provide	2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17	SALZMAN - DAY I through SP-2309. It's a document that was produced to us in discovery in July 2008 by your counsel. Q. Do you recognize this document? A. You know what? I don't. Q. Do you know what this document represents? A. It appears to be a list of people who are reported in the company who have cancelled their enrollment or have not come in because of these same issues. Q. Do you know whether this was intended to supplement Exhibits A, B and C? A. I imagine that it was. Q. Does Salzman 17 and Salzman 18 constitute the entire universe of people who stopped taking NXIVM classes because of the
2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18 19	SALZMAN - DAY I Q. Okay. Can you tell me what Exhibit A represents? A. Loss of existing clients. Q. Those were people who were existing clients of NXIVM who stopped taking classes because of the actions alleged? A. That's correct. Q. What is Exhibit B? A. That's a class of perspective clients. Q. And what are those? A. Those are clients who would have taken the program had it not been for the the events that occurred concerning this lawsuit. Q. And what is Exhibit C? A. They are individuals of professional firms that have refused to provide services to us as a result of the same thing; in	2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18	SALZMAN - DAY I through SP-2309. It's a document that was produced to us in discovery in July 2008 by your counsel. Q. Do you recognize this document? A. You know what? I don't. Q. Do you know what this document represents? A. It appears to be a list of people who are reported in the company who have cancelled their enrollment or have not come in because of these same issues. Q. Do you know whether this was intended to supplement Exhibits A, B and C? A. I imagine that it was. Q. Does Salzman 17 and Salzman 18 constitute the entire universe of people who
2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18 19 20	SALZMAN - DAY I Q. Okay. Can you tell me what Exhibit A represents? A. Loss of existing clients. Q. Those were people who were existing clients of NXIVM who stopped taking classes because of the actions alleged? A. That's correct. Q. What is Exhibit B? A. That's a class of perspective clients. Q. And what are those? A. Those are clients who would have taken the program had it not been for the the events that occurred concerning this lawsuit. Q. And what is Exhibit C? A. They are individuals of professional firms that have refused to provide services to us as a result of the same thing; in this lawsuit.	2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18	SALZMAN - DAY I through SP-2309. It's a document that was produced to us in discovery in July 2008 by your counsel. Q. Do you recognize this document? A. You know what? I don't. Q. Do you know what this document represents? A. It appears to be a list of people who are reported in the company who have cancelled their enrollment or have not come in because of these same issues. Q. Do you know whether this was intended to supplement Exhibits A, B and C? A. I imagine that it was. Q. Does Salzman 17 and Salzman 18 constitute the entire universe of people who stopped taking NXIVM classes because of the actions of my clients? MR. MC GUIRE: As of when?
2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18 19 20 21	SALZMAN - DAY I Q. Okay. Can you tell me what Exhibit A represents? A. Loss of existing clients. Q. Those were people who were existing clients of NXIVM who stopped taking classes because of the actions alleged? A. That's correct. Q. What is Exhibit B? A. That's a class of perspective clients. Q. And what are those? A. Those are clients who would have taken the program had it not been for the the events that occurred concerning this lawsuit. Q. And what is Exhibit C? A. They are individuals of professional firms that have refused to provide services to us as a result of the same thing; in this lawsuit. Q. Has NXIVM ever supplemented	2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18 19 20	SALZMAN - DAY I through SP-2309. It's a document that was produced to us in discovery in July 2008 by your counsel. Q. Do you recognize this document? A. You know what? I don't. Q. Do you know what this document represents? A. It appears to be a list of people who are reported in the company who have cancelled their enrollment or have not come in because of these same issues. Q. Do you know whether this was intended to supplement Exhibits A, B and C? A. I imagine that it was. Q. Does Salzman 17 and Salzman 18 constitute the entire universe of people who stopped taking NXIVM classes because of the actions of my clients? MR. MC GUIRE: As of when? MR. KOFMAN: Well, let me just ask
2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18 19 20 21 22	SALZMAN - DAY I Q. Okay. Can you tell me what Exhibit A represents? A. Loss of existing clients. Q. Those were people who were existing clients of NXIVM who stopped taking classes because of the actions alleged? A. That's correct. Q. What is Exhibit B? A. That's a class of perspective clients. Q. And what are those? A. Those are clients who would have taken the program had it not been for the the events that occurred concerning this lawsuit. Q. And what is Exhibit C? A. They are individuals of professional firms that have refused to provide services to us as a result of the same thing; in this lawsuit. Q. Has NXIVM ever supplemented Exhibits A, B and C since August 26th, 2005?	2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18 19 20 21	SALZMAN - DAY I through SP-2309. It's a document that was produced to us in discovery in July 2008 by your counsel. Q. Do you recognize this document? A. You know what? I don't. Q. Do you know what this document represents? A. It appears to be a list of people who are reported in the company who have cancelled their enrollment or have not come in because of these same issues. Q. Do you know whether this was intended to supplement Exhibits A, B and C? A. I imagine that it was. Q. Does Salzman 17 and Salzman 18 constitute the entire universe of people who stopped taking NXIVM classes because of the actions of my clients? MR. MC GUIRE: As of when? MR. KOFMAN: Well, let me just ask as of today.
2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18 19 20 21 22 23	SALZMAN - DAY I Q. Okay. Can you tell me what Exhibit A represents? A. Loss of existing clients. Q. Those were people who were existing clients of NXIVM who stopped taking classes because of the actions alleged? A. That's correct. Q. What is Exhibit B? A. That's a class of perspective clients. Q. And what are those? A. Those are clients who would have taken the program had it not been for the the events that occurred concerning this lawsuit. Q. And what is Exhibit C? A. They are individuals of professional firms that have refused to provide services to us as a result of the same thing; in this lawsuit. Q. Has NXIVM ever supplemented Exhibits A, B and C since August 26th, 2005? A. We have hired we have, at the	2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18 19 20 21 22	salzman - Day I through SP-2309. It's a document that was produced to us in discovery in July 2008 by your counsel. Q. Do you recognize this document? A. You know what? I don't. Q. Do you know what this document represents? A. It appears to be a list of people who are reported in the company who have cancelled their enrollment or have not come in because of these same issues. Q. Do you know whether this was intended to supplement Exhibits A, B and C? A. I imagine that it was. Q. Does Salzman 17 and Salzman 18 constitute the entire universe of people who stopped taking NXIVM classes because of the actions of my clients? MR. MC GUIRE: As of when? MR. KOFMAN: Well, let me just ask as of today. A. I imagine, yes. I think the answer
2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18 19 20 21 22	SALZMAN - DAY I Q. Okay. Can you tell me what Exhibit A represents? A. Loss of existing clients. Q. Those were people who were existing clients of NXIVM who stopped taking classes because of the actions alleged? A. That's correct. Q. What is Exhibit B? A. That's a class of perspective clients. Q. And what are those? A. Those are clients who would have taken the program had it not been for the the events that occurred concerning this lawsuit. Q. And what is Exhibit C? A. They are individuals of professional firms that have refused to provide services to us as a result of the same thing; in this lawsuit. Q. Has NXIVM ever supplemented Exhibits A, B and C since August 26th, 2005?	2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18 19 20 21 22 23	SALZMAN - DAY I through SP-2309. It's a document that was produced to us in discovery in July 2008 by your counsel. Q. Do you recognize this document? A. You know what? I don't. Q. Do you know what this document represents? A. It appears to be a list of people who are reported in the company who have cancelled their enrollment or have not come in because of these same issues. Q. Do you know whether this was intended to supplement Exhibits A, B and C? A. I imagine that it was. Q. Does Salzman 17 and Salzman 18 constitute the entire universe of people who stopped taking NXIVM classes because of the actions of my clients? MR. MC GUIRE: As of when? MR. KOFMAN: Well, let me just ask as of today.

Page 117 Page 119 1 1 SALZMAN - DAY I SALZMAN - DAY I 2 18 constitute the entire universe of people who 2 who assisted in the preparation of Salzman 17? 3 NXIVM claims did not take its classes because of 3 A. Edgar Boone, Dawn Morrison, Barbara 4 the actions of my clients? 4 Bouchey, Alex Betancourt, Esther Chiappone and 5 5 A. I'm not sure because I don't know Susan Dones. when this was compiled, and that still continues 6 6 (The requested portion of the 7 to happen even now. 7 record was read.) 8 Q. As of the date it was produced, 8 A. There's one more. Barbara Jeske. does this constitute the entire universe of people 9 9 I'm sorry. who NXIVM is aware of who didn't take the classes? 10 10 O. Are all of these individuals still A. To the best of my understanding, field trainers at NXIVM? 11 11 12 12 A. No. yes. 13 O. And does this constitute the --13 Q. Who among this group is no longer a 14 does Exhibit -- strike that. 14 field trainer? 15 Does Salzman 17 and Salzman 18 15 A. Dawn Morrison is no longer a field constitute the entire universe of vendors who 16 16 trainer, and Barbara Bouchey is no longer a field 17 refuse to provide services to NXIVM because of the 17 trainer. 18 actions of my client? 18 Okay. Is Dawn Morrison still O. 19 A. I would -- to the best of my 19 affiliated with NXIVM? 20 knowledge, yes. 20 A. She is. 21 Q. Okay. Let's focus on Salzman 17 21 Q. How about Barbara Bouchey? 22 for a little bit. How did NXIVM compile the 2.2 A. She is not. 23 information -- strike that. 23 Q. When did she leave NXIVM? 24 Do you know who compiled the 24 A. In April. 25 information that's contained in Salzman 17? 25 Of this year? Page 118 Page 120 1 1 SALZMAN - DAY I SALZMAN - DAY I 2 2 A. I think the person who oversaw A. Correct. Also, Susan Dones is not 3 producing this was Karen Unterriener. 3 a field trainer any longer. And she left in April 4 O. And did Ms. Unterriener oversee 4 as well. 5 producing Salzman 18? 5 Q. Left the group? A. I don't know. I'm not sure. This б A. Yes. 6 7 is a new document to me, so I'm not sure. I can 7 O. What is Dawn Morrison's current 8 find out, though. 8 role with NXIVM? 9 9 A. She is on the communications board. Q. I would like you to follow up since you have been designated by the company. 10 10 She's on the communications board. She works in 11 A. I'm sorry. For some reason, this 11 communications now. 12 12 one got by, and I didn't see this one. I will get Q. Was that a promotion within the 13 organization or a lateral move? 13 you that data, though. 14 Q. Thank you. Turning back to Salzman 14 A. It was a lateral move. 15 17, who worked with Ms. Unterriener on compiling 15 Q. Okay. How did Ms. Unterriener 16 this information, if anybody? 16 coordinate the gathering of information for 17 A. My belief is that all of the field 17 Salzman 17? 18 trainers in the company, the people who are 18 MR. MC GUIRE: If you know. 19 directly responsible for enrollment, were involved 19 A. When the events began to transpire 20 20 in the company, and people began to leave, she was in this. 21 O. How many field trainers are there? 21 assigned to compile a list of all of the people 22 who resigned from the company or left the company. 22 Then? A. 23 And she was also assigned to follow up with the 23 O. Yes. 24 commerce division whenever there was a report of 24 A. I think there were six. 25 25 someone who expressed that the reason that they And who were those field trainers

	Page 121		Page 123
1	SALZMAN - DAY I	1	SALZMAN - DAY I
2	weren't taking the training had to do with any of	2	compiled into Salzman 17 and 18?
3	these events.	3	A. Yes.
4	Q. By the way, did Kristin Keeffe have	4	(Exhibit Salzman 19 marked for
5	any role in compiling Exhibits A, B, and C?	5	identification.)
6	A. I believe that Kristin Keeffe	6	MR. KOFMAN: For the record,
7	worked very closely with Karen Unterriener, and	7	Salzman 19 are documents that were produced to
8	also with the field trainers.	8	us in discovery, again, I believe in July of
9	Q. Okay. Who asked Karen Unterriener	9	last year, by NXIVM. They're marked with
10	to keep track of people who left NXIVM?	10	Bates Stamp Nos. SP-2049 and SP-2230.
11	A. I did.	11	Q. Ms. Salzman, do you recognize these
12	Q. And was that sometime in 2003?	12	documents?
13	A. Yes, it was.	13	A. Yes.
14	Q. And do you know what	14	Q. Is this the content of
15	Ms. Unterriener did to keep track of that	15	Ms. Unterriener's files concerning lost business?
16	information?	16	MR. MC GUIRE: Is it a part of it?
17	A. Ms. Unterriener is an actuary. So,	17	A. This is a part of it.
18	I didn't I know that she had a report that she	18	Q. Is there more to the file than
19	created that was filled out by the individuals	19	this?
20	that were involved. And I know that she had files	20	A. I'm not sure, but this is certainly
21	that she kept and oversaw over the years, which	21	a part of it.
22	she still has.	22	Q. And is it your understanding that
23	Q. Okay. Have you seen those files?	23	Ms. Unterriener's files have been produced in this
24	A. I have. I've seen where she keeps	24	litigation?
25	them, and I've seen some of them when she was	25	A. Up until recently.
	Page 122		Page 124
1	SALZMAN - DAY I	1	SALZMAN - DAY I
2	working on them recently.	2	Q. Up until the date of production?
3	Q. Where does she keep those files?	3	A. Right.
4	A. She has an office. And in that	4	MR. KOFMAN: Okay. And I would
5	building, we have a locked room where we keep	5	just note that there's a continuing obligation
6	legal documents.	6	to produce. And so, if there's anything new
7	Q. Did Ms. Unterriener send any	7	that's been added, that that should be
8	documents out to field trainers to help them	8	produced.
9	compile the information?	9	Q. But as of a certain date, the date
10	A. I know that she met with them on a	10	that the second list came in, this would be the
11	number of occasions. Whether she gave them to	11	entire set of files?
12	them in person or sent them out, I'm not sure.	12	A. I think, likely.
13 14	Q. And do her files include all	13 14	Q. Okay. MR. KOFMAN: Mark this as Salzman
15	information that NXIVM has concerning the people	15	
16	identified in Exhibits A, B and C? A. I believe that her files do. I	16	20. (Exhibit Solamon 20 marked for
17	believe that Karen oversees that entire project.	17	(Exhibit Salzman 20 marked for
18	Q. So, any information that NXIVM has	18	identification.) Q. Do you recognize this document?
19	concerning lost business, including existing	19	A. I do.
20	clients, potential clients or vendors, would be in	20	Q. And what is this?
21	Ms. Unterriener's files?	21	A. This is the form that Karen uses,
22		22	or the people that Karen works with uses.
	A Ullimatery it open to		
	A. Ultimately, it goes to Ms. Unterriener, and she is in charge of that		
23	Ms. Unterriener, and she is in charge of that	23	Q. So, Karen sent this to the field
	· -		

Page 125

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Page 127

SALZMAN - DAY I

to them or sent it to them.

- Q. What instructions did she give to the field trainers about getting information for her?
- A. She asked them to keep track of anybody who fit any of these categories, and to please fill these out, and to return them to corporate. Either to have their people and themselves do it, or people do it and give it to them, and then they give it to corporate or give it directly to her.
- Q. Did she ask the field trainers to keep a list of people who left NXIVM or didn't take classes for any reason whatsoever, or just affiliated with what defendants in this litigation are alleged to have done?
 - A. It was just in this litigation.
- Q. So, she specifically said we only are interested in people who left because of something that was alleged in this litigation, not for people who left for other reasons?
 - A. That's correct.
- Q. And so, Exhibits A, B and C, as supplemented, only include people who left for

SALZMAN - DAY I

who came to help be sure that everything was covered.

- Q. Did you have any conversations yourself with any of the people on Exhibit A as to why they left NXIVM?
- A. Yes. The ones that I was directly related with, who spoke with me directly.
 - Q. Who was that?
- A. After this began to happen, Stephen Cooper, who was the CEO of Enron, called me, and discontinued our coaching relationship and my relationship consulting with his company. Sheila Johnson called me. Adam Glassman called me. He is the creative design editor of O magazine.

I think there are more, but there were people who I was directly coaching who called me who were corporate clients at the time.

These are people who left you're asking me or you're asking me --

Q. Correct.

A. Okay. Some of the people in my organization, Peter Fallon talked to me directly. I spoke with Mary O'Donnell. She's a developer up in Boston. She spoke with me directly. Antonio

Page 126

Page 128

SALZMAN - DAY I

reasons relating to this lawsuit. Correct?

- A. That's correct.
- Q. Okay. Other than supervising Ms. Unterriener, did you have any role in compiling the information that went into Exhibits A, B and C?
 - A. I did.
 - Q. What was your role?
- A. I went to a number of meetings to inspire my staff to -- to do this work, to help Ms. Unterriener get this together, and to make sure that I communicated the magnitude of importance of following through with this.
- Q. The staff who attended this meeting, was that the field trainers?
- A. It was the field trainers, and they brought their key people with them at times.
- Q. Sure. Do you know who some of the other key people were who were involved in the preparation of A, B and C?
- A. There were a few of the proctors in my organization, or senior proctors who are not specifically involved in sales themselves, but have large organizations within the organization

SALZMAN - DAY I

Novello, who is the commissioner of health for the

3 State of New York, spoke to me directly. Michael

Gerber spoke to me. Leonard LoBiondo spoke to me.

5 He was the COO of Kroll Zolfo Cooper. And Michael

6 France, who was also a COO of that company.

Alejandro Junco, who is the publisher of a wholeseries of newspapers in Mexico.

I think those were the major ones that I spoke to directly that I was working with.

- Q. And did you contribute those names to Ms. Unterriener?
 - A. I did.
- Q. By the way, you mentioned earlier Barbara Bouchey leaving the group. Did her leaving have anything to do with the actions of defendants in this case?

MR. MC GUIRE: Do you understand the question?

MR. KOFMAN: Strike that.

- Q. Why did Barbara Bouchey leave the organization?
- A. She was unhappy with a number of things about the way the company was being managed and run.

Page 129 Page 131 1 1 SALZMAN - DAY I SALZMAN - DAY I 2 2 a couple of other people who appear on Exhibits A, O. Does NXIVM contend that the 3 3 B and C? defendants in this action are responsible for her 4 4 A. Yes. Fritjof Capra is one of them. leaving? 5 5 MR. MC GUIRE: Can I hear that back And Michael Gerber. 6 6 again, please? Does NXIVM contend? Q. Did anyone else leave NXIVM at the 7 7 MR. KOFMAN: That defendants in same time as Ms. Dones and Ms. Bouchey? 8 this action are responsible for her leaving. 8 A. Yes Q. Who? 9 MR. MC GUIRE: How would she know. 9 10 10 MR. KOFMAN: She is NXIVM. She is A. Nina Cowell, Angela Oochi, Ellen 11 the designated person on damages. 11 Gibson, Kim Woolhouse, Sheila Cody and Kathy 12 12 Ikver. A. I don't believe so. 13 O. And the other person I think you 13 O. What title did each of these 14 mentioned ---14 individuals hold in the organization? 15 Susan Dones. 15 A. Barbara was a field trainer. Susan A. 16 Susan Dones. Why did she leave the 16 was a field trainer. Angela Oochi was a head 17 company? 17 trainer in training. Kim Woolhouse was a proctor 18 18 in the organization. And the others were coaches. A. The same reason. 19 Q. Was their leaving amicable? 19 Q. Did they all sign the letter that 20 20 you said you received from Ms. Dones and A. No. Ms. Bouchey? 21 Q. In what way was it not amicable? 21 2.2 They wrote me a letter making a 2.2 A. They did. 23 demand for money, and they included, within the 23 Q. What did that letter threaten to 24 24 demand, that within 24 hours of receiving the reveal about NXIVM? 25 25 letter, they wanted me to acknowledge receipt of A. It didn't say. Page 130 Page 132 1 1 SALZMAN - DAY I SALZMAN - DAY I 2 the letter. 2 Q. Did it say what they would go to 3 3 Within 48 hours of receipt of the the press about? 4 4 letter, they wanted me to agree to the terms of A. The things that they were disturbed 5 their demand. And within five days they wanted a 5 about. They had a series of meetings, four 6 certified check in the amount of \$2,000,080 or б meetings with Keith Raniere, earlier that week, 7 7 they were going to the press. and I was not invited to those meetings, nor did 8 Q. \$2,000,080? 8 they disclose what they were discussing with him 9 9 with me. And then at the end of that week and a A. Yes. 10 Q. Cab fare, I guess. 10 half, or two weeks, they wrote that letter. 11 11 Q. Did Mr. Raniere tell you what they A. I guess. Q. Have they spoken to the press; do 12 12 discussed with him? 13 you know? 13 A. He told me that the things that 14 A. 14 They have not. they were discontent about had to do with the way 15 Okay. How long had Ms. Bouchey 15 the company was being run. 16 been with the organization? 16 Q. Did any of these other people's 17 17 A. Eight years. decision, Ms. Oochi and so forth, the names that 18 O. And how about Ms. Dones? 18 you gave me, did any of their -- did their leaving have anything to do with the allegations against 19 A. I think about seven. 19 20 O. And both of them had been field 20 defendants in this lawsuit? 21 trainers. Correct? 21 A. I don't believe so. 22 A. That's correct. 22 Q. Okay. Did all of these people have 23 23 (Recess taken.) access to NXIVM trade secret material? 24 Q. Ms. Salzman, I believe you 24 A. "Access" meaning they were all 25 mentioned that you think you may have spoken with 25 participants in the program and they all received

	Page 133		Page 135
1	SALZMAN - DAY I	1	SALZMAN - DAY I
2	student notes or worked with facilitator notes,	2	Q. And is that when you did the
3	yes.	3	training for Kroll Zolfo?
4	Q. Did they all have copies of	4	A. Yes, I believe so.
5	facilitator notes?	5	Q. Where did that training take place?
6	A. No.	6	A. In New York City.
7	Q. Did any of them have copies of	7	Q. How many people attended?
8	facilitator notes?	8	A. 40.
9	A. No. No one has copies of	9	Q. And they were all Kroll Zolfo
10	facilitator notes.	10	employees?
11	Q. Did NXIVM ask any of these	11	A. They were all account managers.
12	individuals to return any of the material they had	12	Q. Did you continue to coach
13	in their possession?	13	Mr. Cooper after doing that presentation?
14	A. Yes.	14	A. I did.
15	Q. When did they make that request?	15	Q. How long did you coach him for?
16	A. As soon as we got the letter.	16	A. I believe it was about a year and a
17	Q. And have any of these people	17	half in total.
18	returned material?	18	Q. And this coaching was outside of
19	A. Yes. I don't know if all of them	19	NXIVM training sessions? It was just one-on-one?
20	have, but most of them have. To the best of my	20	A. Yes.
21	knowledge, almost all of them have. I believe all	21	Q. And when did you have this phone
22	of them have.	22	conversation with him about his leaving NXIVM?
23	Q. Does NXIVM have records of what	23	A. It was probably the beginning of
24	they returned?	24	November 2003.
25	A. I imagine. I think we have what	25	Q. Did he call you?
	Page 134		Page 136
1	SALZMAN - DAY I	1	SALZMAN - DAY I
2	they returned.	2	A. He did.
3	Q. Let's go back to some of the people	3	Q. Did you take notes of the
4	you said you spoke to. Stephen Cooper was the	4	Q. Did you take notes of the
_			conversation?
5	first name you mentioned. And you said that he		conversation? A I think I did
5 6	first name you mentioned. And you said that he was involved with Enron?	5	A. I think I did.
6	was involved with Enron?	5 6	A. I think I did.Q. What did he say to you?
6 7	was involved with Enron? A. He was appointed he was the	5 6 7	A. I think I did.Q. What did he say to you?A. He said that because we were
6 7 8	was involved with Enron? A. He was appointed he was the owner of Zolfo Cooper and Kroll bought them, so it	5 6 7 8	A. I think I did.Q. What did he say to you?A. He said that because we were becoming controversial, he was told to discontinue
6 7 8 9	was involved with Enron? A. He was appointed he was the owner of Zolfo Cooper and Kroll bought them, so it became Kroll Zolfo Cooper.	5 6 7 8 9	 A. I think I did. Q. What did he say to you? A. He said that because we were becoming controversial, he was told to discontinue his relationship with me, and that the trainings
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	Page 137		Page 139
1	SALZMAN - DAY I	1	SALZMAN - DAY I
2	Q. In either of these conversations,	2	Q. How did Forbes learn that Stephen
3	did you discuss him coming back to NXIVM or	3	Cooper was a student of NXIVM?
4	coaching with you?	4	MR. MC GUIRE: Object to the form
5	A. No.	5	of the question.
6	Q. So, what Mr. Cooper told you his	6	Q. Did you tell Forbes that Stephen
7	reason for leaving was that the group had become	7	Cooper had taken classes?
8	controversial and he was told to discontinue?	8	A. No.
9	A. Yes. It was too charged a topic	9	Q. Did Mr. Raniere?
10	for him to be involved in.	10	A. No.
11	Q. Did he say who had asked him to	11	Q. Do you know how Forbes learned that
12	discontinue or told him to discontinue his	12	information?
13	relationship?	13	A. No.
14	A. Julian Kroll.	14	Q. Did NXIVM ever use Mr. Cooper's
15	Q. Did he explain what he meant by	15	name on any promotional material?
16	"too controversial"?	16	A. I don't believe so.
17	A. I think it was implied.	17	Q. Had Sheila Johnson ever given NXIVM
18	Q. Did he mention the Ross the	18	permission to use her name?
19	Martin or Hochman articles?	19	A. No.
20	A. He mentioned the article in Forbes	20	Q. And so, getting back to this
21	Magazine that mentioned the Hochman article.	21	conversation with Sheila Johnson, she said that
22	Q. Okay. And the article in Forbes	22	she was upset that her name had been used in the
23	Magazine had appeared when?	23	Forbes article?
24	A. October 2003.	24	A. Yes.
25	Q. Is it your understanding that	25	Q. Was there anything else she said?
	Page 138		Page 140
1			
	SALZMAN - DAY I	1	SALZMAN - DAY I
	SALZMAN - DAY I that's what prompted his call?	1 2	SALZMAN - DAY I A She asked me to please keep our
2	that's what prompted his call?	2	A. She asked me to please keep our
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	Page 141		Page 143
1	SALZMAN - DAY I	1	SALZMAN - DAY I
2	A. Well, the confidential part did.	2	it's a specialized type of pharmacy.
3	She didn't want to read about it in a newspaper or	3	Q. Do you recall the name?
4	in a magazine.	4	A. Fallon's Pharmacy.
5	Q. So, two years ago she called you on	5	Q. When did you speak to Mr. Fallon
6	a personal matter?	6	about his reason for leaving?
7	A. Yes.	7	A. It was within a year of what was
8	Q. Okay. Are you presently coaching	8	going on.
9	her?	9	Q. Did this conversation take place in
10	A. No. I haven't I haven't been	10	person or on the phone?
11	coaching her in a couple of years.	11	A. It was a person-to-person
12	Q. Okay. The next person I believe	12	conversation.
13	you mentioned is Adam Glassman.	13	Q. What did he tell you?
14	A. Yes.	14	A. He told me he was leaving.
15	Q. Who is Mr. Glassman?	15	Q. Did he say why?
16	A. He's the creative design editor of	16	A. Yes.
17	O magazine.	17	Q. What did he say?
18	Q. And what was his relationship with	18	A. His wife had been very disturbed by
19	NXIVM?	19	the Rick Ross website and the things that were
20	A. He had taken a VIP training and I	20	alleged in the Rick Ross website, and that she had
21	was coaching him.	21	a couple of conversations with Rick Ross, and that
22	Q. When did he call you?	22	he was he thought it was becoming a problem in
23	A. After the article.	23	his marriage. And in order for his marriage to be
24	Q. Which article?	24 25	okay, we had to leave.
25	A. The Forbes article.	_∠5	Q. Did you try to talk Mr. Fallon out
	Page 142		Page 144
1	SALZMAN - DAY I	1	SALZMAN - DAY I
2	Q. And what did he say?	2	of his decision?
3	A. Just that he didn't want his name	3	A. No.
4	to be affiliated with our company. It could be a	4	Q. Has he ever come back to NXIVM?
5	problem for him.	5	A. No.
6	Q. Was his name mentioned in the	6	Q. Did he mention anything else other
7	Forbes article?	7	than his wife having seen the Rick Ross or read
8	A. It wasn't, but he wanted to be sure	8	the Rick Ross website and speaking to Mr. Ross?
9	that it wasn't on any list or that he wouldn't	9	A. He told me
	read about it.	10	(Recess taken.)
10			(TD) 1 1 1 C 1
11	Q. And did he stop taking classes and	11	(The requested portion of the
11 12	having a coaching relationship with you after	12	record was read.)
11 12 13	having a coaching relationship with you after that?	12 13	record was read.) A. Peter is sort of a pillar of the
11 12 13 14	having a coaching relationship with you after that? A. Yes. He didn't say it in the phone	12 13 14	record was read.) A. Peter is sort of a pillar of the community. He has a business within the Albany
11 12 13 14 15	having a coaching relationship with you after that? A. Yes. He didn't say it in the phone call, but it ended after that.	12 13 14 15	record was read.) A. Peter is sort of a pillar of the community. He has a business within the Albany community, and everybody knows Peter. And he told
11 12 13 14 15 16	having a coaching relationship with you after that? A. Yes. He didn't say it in the phone call, but it ended after that. Q. Okay. Now, Peter Fallon was the	12 13 14 15 16	record was read.) A. Peter is sort of a pillar of the community. He has a business within the Albany community, and everybody knows Peter. And he told me that what was happening with our reputation in
11 12 13 14 15 16 17	having a coaching relationship with you after that? A. Yes. He didn't say it in the phone call, but it ended after that. Q. Okay. Now, Peter Fallon was the next name you mentioned. He was a coach at NXIVM?	12 13 14 15 16 17	record was read.) A. Peter is sort of a pillar of the community. He has a business within the Albany community, and everybody knows Peter. And he told me that what was happening with our reputation in the community was really bad, and that it was
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11 12 13 14 15 16 17 18 19 20	having a coaching relationship with you after that? A. Yes. He didn't say it in the phone call, but it ended after that. Q. Okay. Now, Peter Fallon was the next name you mentioned. He was a coach at NXIVM? A. He was a coach. Q. Was he involved at a business strike that.	12 13 14 15 16 17 18 19 20	record was read.) A. Peter is sort of a pillar of the community. He has a business within the Albany community, and everybody knows Peter. And he told me that what was happening with our reputation in the community was really bad, and that it was affecting his business to be affiliated with us, and that he, if he continued to be affiliated with us, would lose his business, he believed.
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11 12 13 14 15 16 17 18 19 20 21 22 23	having a coaching relationship with you after that? A. Yes. He didn't say it in the phone call, but it ended after that. Q. Okay. Now, Peter Fallon was the next name you mentioned. He was a coach at NXIVM? A. He was a coach. Q. Was he involved at a business strike that. Was Mr did Mr. Fallon work at a company; are you aware?	12 13 14 15 16 17 18 19 20 21 22 23	record was read.) A. Peter is sort of a pillar of the community. He has a business within the Albany community, and everybody knows Peter. And he told me that what was happening with our reputation in the community was really bad, and that it was affecting his business to be affiliated with us, and that he, if he continued to be affiliated with us, would lose his business, he believed. And he let me know the magnitude of the damage that was done in the community.

	Page 145		Page 147
1	SALZMAN - DAY I	1	SALZMAN - DAY I
2	A. We had a series of conversations.	2	Internet they had looked at?
3	Q. Did that testimony summarize those	3	A. The Ross website.
4	conversations?	4	Q. And did she indicate what research
5	A. Yes.	5	her family had done?
6	Q. Okay. The next name you gave me	6	A. I guess they had researched the
7	was Mary O'Donnell. Who is Ms. O'Donnell?	7	Ross website, and then anything they could link to
8	A. Mary O'Donnell was from Boston,	8	as a result of that, the articles.
9	Massachusetts. She had a large construction	9	Q. Well, did she tell you that or is
10	company in Boston.	10	that an assumption on your part?
11	Q. What type of company did she have?	11	A. Oh, no. She told me they had
12	A. Construction.	12	all her children, and her mother, and her
13	Q. And what was her relationship with	13	siblings had all created some sort of family
14	NXIVM?	14	intervention around this whole thing.
15	A. She was a student, a participant.	15	Q. Am I correct that Antonio Novello
16	I don't think she was a coach, but she took many	16	was, at one time, surgeon general of the United
17	trainings, and was coached, and she sent many	17	States?
18	people to our organization.	18	A. Yes, she was.
19	Q. Were you her coach?	19	Q. How many NXIVM courses had she
20	A. I don't think I coached her	20	taken?
21	personally.	21	A. She hired me to train her entire
22	Q. When did you have a conversation	22	staff shortly after I started the company.
23	with Ms. O'Donnell about her reason for leaving?	23	Q. That was back in 1998 she hired
24	A. I called her.	24	you?
25	Q. When was that?	25	A. No. She hired me like around 2000.
	Q. When was that.		11. 1 (d. Blie life life life around 2000.
	Page 146		Page 148
1	Page 146 SALZMAN - DAY I	1	Page 148 SALZMAN - DAY I
1 2	SALZMAN - DAY I	1 2	SALZMAN - DAY I
2	SALZMAN - DAY I A. She was somebody I had called	2	SALZMAN - DAY I Q. Okay. And this was her staff
2	SALZMAN - DAY I A. She was somebody I had called because she had resigned from the organization, I	2	SALZMAN - DAY I Q. Okay. And this was her staff where?
2 3 4	SALZMAN - DAY I A. She was somebody I had called because she had resigned from the organization, I think, in early 2004.	2 3 4	SALZMAN - DAY I Q. Okay. And this was her staff where? A. It was for the Department of
2 3 4 5	SALZMAN - DAY I A. She was somebody I had called because she had resigned from the organization, I think, in early 2004. Q. How did she make her resignation	2 3 4 5	SALZMAN - DAY I Q. Okay. And this was her staff where? A. It was for the Department of Health.
2 3 4 5 6	SALZMAN - DAY I A. She was somebody I had called because she had resigned from the organization, I think, in early 2004. Q. How did she make her resignation known?	2 3 4 5 6	SALZMAN - DAY I Q. Okay. And this was her staff where? A. It was for the Department of Health. Q. New York State?
2 3 4 5 6 7	SALZMAN - DAY I A. She was somebody I had called because she had resigned from the organization, I think, in early 2004. Q. How did she make her resignation known? A. She wrote I believe she wrote a	2 3 4 5 6 7	SALZMAN - DAY I Q. Okay. And this was her staff where? A. It was for the Department of Health. Q. New York State? A. That's right.
2 3 4 5 6 7 8	SALZMAN - DAY I A. She was somebody I had called because she had resigned from the organization, I think, in early 2004. Q. How did she make her resignation known? A. She wrote I believe she wrote a note to the person who brought her in.	2 3 4 5 6 7 8	SALZMAN - DAY I Q. Okay. And this was her staff where? A. It was for the Department of Health. Q. New York State? A. That's right. Q. And did she hire you personally or
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2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18 19 20 21	SALZMAN - DAY I A. She was somebody I had called because she had resigned from the organization, I think, in early 2004. Q. How did she make her resignation known? A. She wrote I believe she wrote a note to the person who brought her in. Q. Who was that? A. Carole Burgeron. Q. Do you know if Ms. Burgeron turned that note over to Ms. Unterriener? A. I don't know, but I can find out. Q. Okay. So, when did you call her, Ms. O'Donnell? A. I think it was early in 2004, like around the first of the year. Q. And what did she say? A. She said that her family was deeply disturbed by what was on the Internet, and they were researched, and they were concerned about her	2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18 19 20 21	SALZMAN - DAY I Q. Okay. And this was her staff where? A. It was for the Department of Health. Q. New York State? A. That's right. Q. And did she hire you personally or NXIVM? A. NXIVM Corporation. Q. And did you train her staff? A. Well, it was Executive Success back then. Q. Okay. Did you train her staff? A. Yes, I did. Q. When did that training take place? A. I think it was 2000. Q. Did you have any dealings with Ms. Novello after 2000? A. I did. Q. What were the nature of those?
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2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18 19 20 21 22 23	SALZMAN - DAY I A. She was somebody I had called because she had resigned from the organization, I think, in early 2004. Q. How did she make her resignation known? A. She wrote I believe she wrote a note to the person who brought her in. Q. Who was that? A. Carole Burgeron. Q. Do you know if Ms. Burgeron turned that note over to Ms. Unterriener? A. I don't know, but I can find out. Q. Okay. So, when did you call her, Ms. O'Donnell? A. I think it was early in 2004, like around the first of the year. Q. And what did she say? A. She said that her family was deeply disturbed by what was on the Internet, and they were researched, and they were concerned about her affiliation with our organization, and they put a lot of pressure on her and she didn't want to have	2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18 19 20 21 22 23	SALZMAN - DAY I Q. Okay. And this was her staff where? A. It was for the Department of Health. Q. New York State? A. That's right. Q. And did she hire you personally or NXIVM? A. NXIVM Corporation. Q. And did you train her staff? A. Well, it was Executive Success back then. Q. Okay. Did you train her staff? A. Yes, I did. Q. When did that training take place? A. I think it was 2000. Q. Did you have any dealings with Ms. Novello after 2000? A. I did. Q. What were the nature of those? A. I coached her. Q. Oh, do you continue to coach her?
2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18 19 20 21 22	SALZMAN - DAY I A. She was somebody I had called because she had resigned from the organization, I think, in early 2004. Q. How did she make her resignation known? A. She wrote I believe she wrote a note to the person who brought her in. Q. Who was that? A. Carole Burgeron. Q. Do you know if Ms. Burgeron turned that note over to Ms. Unterriener? A. I don't know, but I can find out. Q. Okay. So, when did you call her, Ms. O'Donnell? A. I think it was early in 2004, like around the first of the year. Q. And what did she say? A. She said that her family was deeply disturbed by what was on the Internet, and they were researched, and they were concerned about her affiliation with our organization, and they put a	2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18 19 20 21 22	SALZMAN - DAY I Q. Okay. And this was her staff where? A. It was for the Department of Health. Q. New York State? A. That's right. Q. And did she hire you personally or NXIVM? A. NXIVM Corporation. Q. And did you train her staff? A. Well, it was Executive Success back then. Q. Okay. Did you train her staff? A. Yes, I did. Q. When did that training take place? A. I think it was 2000. Q. Did you have any dealings with Ms. Novello after 2000? A. I did. Q. What were the nature of those? A. I coached her.

1 SALZMAN - DAY I 1 SALZMAN	
	N - DAY I
	he say when he called you?
	at he would rather not
4 for a number of years, and I don't think that I 4 continue our relation	
5 coached her beyond the summer of 2003, but she 5 Q. Did he say	•
, , , , , , , , , , , , , , , , , , , ,	e controversy of the
	nething he didn't want to be
8 Q. Did Ms. Novello ever give NXIVM 8 affiliated with.	
6 =	how he learned about the
10 student? 10 controversy?	now he rearried as out the
11 A. No. 11 A. The Forbe	es article.
	you first see the Forbes
13 A. Right after the Forbes article came 13 article?	J 0 11 11 10 10 10 10 10 10 10 10 10 10 1
	eeting that day with the
	Times Union. And they
	Forbes article was coming out
	and looked for the magazine.
	your reaction when you
publicity of this article was a problem for her. 19 read the article?	, , , , , , , , , , , , , , , , , , ,
20 Q. And that was because the article 20 A. I was distu	ırbed.
	elieve it was a negative
A. That's correct. 22 thing for NXIVM?	
Q. So, the fact that the article 23 A. I did.	
	neet with a reporter from
25 A. That's correct. 25 Forbes prior to the ar	rticle's appearance?
Page 150	Page 152
1 SALZMAN - DAY I 1 SALZMAN	I - DAY I
2 Q. Did she say anything else during 2 A. I did.	
(= 10 and 10 an	Keith Raniere at that
4 A. She said it was the controversy, 4 meeting?	
• • • • • • • • • • • • • • • • • • • •	him in New York City for
	had a two-hour discussion,
	e if he could meet with Keith
	ged for that meeting, and I
9 A. I have not. 9 went to that meeting	_
10 Q. Who is Michael Gerber? 10 Q. Was that in	
	ing he came to Albany and
called the E-Myth, and a series of E-Myth 12 we met with him.	,
· · · · · · · · · · · · · · · · · · ·	er of the meetings
Q. And what was his relationship with 14 recorded?	
· · · · · · · · · · · · · · · · · · ·	a tape recorder to the
	th him in the restaurant in
	as a very noisy restaurant and
· · · · · · · · · · · · · · · · · · ·	he he taped the meeting
	h, and he was going to give
· · · · · · · · · · · · · · · · · · ·	but he never did. We
	era, but he wouldn't allow us
22 spring. 22 to videotape him.	I
1 9	he wouldn't allow the
24 I think it was the spring. It was in California, 24 videotape to be made	?
25 so I can't remember. 25 A. That's corre	rect.

	Page 153		Page 155
1	SALZMAN - DAY I	1	SALZMAN - DAY I
2	Q. Did you have somebody who you had	2	Q. And he runs a newspaper in Mexico?
3	brought to the meeting to work the videotape?	3	A. He runs a newspaper called the
4	A. We brought the camera and we set it	4	Reforma, and then he has several smaller
5	up, and Arlin was going to turn it on.	5	newspapers in other cities.
6	Q. That's Arlin Olsen?	6	Q. And what was his relationship with
7	A. Yes.	7	NXIVM?
8	Q. Okay. The next name was Leonard	8	A. Alejandro Junco asked to have a VIP
9	LoBiondo of Kroll Zolfo.	9	training for himself, his wife, his three children
10	A. Leonard LoBiondo was the COO of	10	and their spouses.
11	Steve Cooper's organization.	11	Q. And was that training done?
12	Q. Okay. And what was NXIVM's	12	A. In New York City, yes.
13	relationship with Mr. LoBiondo, if it had one	13	Q. When was that?
14	individually with him?	14	A. I believe it happened in the spring
15	A. When I was coaching Steve Cooper,	15	of 2003.
16	his two partners, Leonard and Mike France, I was	16	Q. Okay. Did there come a time where
17	working with both of them as well, and I was doing	17	he had a conversation with you, where he said he
18	training with the three of them and consulting in	18	didn't want to have anything further to do with
19	their company. And I was working with the three	19	NXIVM?
20	of them.	20	A. I visited him several times in
21	Q. And did you have a conversation	21	Mexico after that, and I was doing coaching
22 23	with Mr. LoBiondo, where he said he was not going	22	sessions with him, and he cancelled.
23 24	to have anything further to do with NXIVM?	23 24	Q. When was that?
2 4 25	A. Yes.Q. Was that a phone conversation?	24 25	A. He became concerned about the
25		45	allegations.
	Page 154		Page 156
1	SALZMAN - DAY I	1	SALZMAN - DAY I
2	SALZMAN - DAY I A. It might have been a face-to-face	2	SALZMAN - DAY I Q. When did he cancel?
2	SALZMAN - DAY I A. It might have been a face-to-face conversation.	2	SALZMAN - DAY I Q. When did he cancel? A. It was probably between October and
2 3 4	SALZMAN - DAY I A. It might have been a face-to-face conversation. Q. And what did he say?	2 3 4	SALZMAN - DAY I Q. When did he cancel? A. It was probably between October and December in 2003.
2 3 4 5	SALZMAN - DAY I A. It might have been a face-to-face conversation. Q. And what did he say? A. He was sorry.	2 3 4 5	SALZMAN - DAY I Q. When did he cancel? A. It was probably between October and December in 2003. Q. Did he tell you he was concerned
2 3 4 5 6	SALZMAN - DAY I A. It might have been a face-to-face conversation. Q. And what did he say? A. He was sorry. Q. Did he say why he was not going to	2 3 4 5 6	SALZMAN - DAY I Q. When did he cancel? A. It was probably between October and December in 2003. Q. Did he tell you he was concerned about the allegations?
2 3 4 5 6 7	SALZMAN - DAY I A. It might have been a face-to-face conversation. Q. And what did he say? A. He was sorry. Q. Did he say why he was not going to have anything further to do with them?	2 3 4 5 6 7	SALZMAN - DAY I Q. When did he cancel? A. It was probably between October and December in 2003. Q. Did he tell you he was concerned about the allegations? A. In Forbes Magazine mostly.
2 3 4 5 6 7 8	SALZMAN - DAY I A. It might have been a face-to-face conversation. Q. And what did he say? A. He was sorry. Q. Did he say why he was not going to have anything further to do with them? A. He said he was told not to by Steve	2 3 4 5 6 7 8	SALZMAN - DAY I Q. When did he cancel? A. It was probably between October and December in 2003. Q. Did he tell you he was concerned about the allegations? A. In Forbes Magazine mostly. Q. Did he mention anything besides
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2 3 4 5 6 7 8 9 10 11 12 13 14	SALZMAN - DAY I A. It might have been a face-to-face conversation. Q. And what did he say? A. He was sorry. Q. Did he say why he was not going to have anything further to do with them? A. He said he was told not to by Steve Cooper. Q. And that relates to the Forbes article? A. They were told that they needed to discontinue their relationship with us. Q. Okay. The next name was Michael	2 3 4 5 6 7 8 9 10 11 12 13 14	SALZMAN - DAY I Q. When did he cancel? A. It was probably between October and December in 2003. Q. Did he tell you he was concerned about the allegations? A. In Forbes Magazine mostly. Q. Did he mention anything besides Forbes Magazine? A. He didn't. No, I think it was Forbes Magazine. Q. Okay. The last name I think you gave me was Capra, Fritjof? A. Fritjof Capra.
2 3 4 5 6 7 8 9 10 11 12 13 14 15	SALZMAN - DAY I A. It might have been a face-to-face conversation. Q. And what did he say? A. He was sorry. Q. Did he say why he was not going to have anything further to do with them? A. He said he was told not to by Steve Cooper. Q. And that relates to the Forbes article? A. They were told that they needed to discontinue their relationship with us. Q. Okay. The next name was Michael France. Is that the other partner at Kroll Zolfo?	2 3 4 5 6 7 8 9 10 11 12 13 14 15	SALZMAN - DAY I Q. When did he cancel? A. It was probably between October and December in 2003. Q. Did he tell you he was concerned about the allegations? A. In Forbes Magazine mostly. Q. Did he mention anything besides Forbes Magazine? A. He didn't. No, I think it was Forbes Magazine. Q. Okay. The last name I think you gave me was Capra, Fritjof? A. Fritjof Capra. Q. Okay. Capra. And who is that?
2 3 4 5 6 7 8 9 10 11 12 13 14 15 16	SALZMAN - DAY I A. It might have been a face-to-face conversation. Q. And what did he say? A. He was sorry. Q. Did he say why he was not going to have anything further to do with them? A. He said he was told not to by Steve Cooper. Q. And that relates to the Forbes article? A. They were told that they needed to discontinue their relationship with us. Q. Okay. The next name was Michael France. Is that the other partner at Kroll Zolfo? A. Yes.	2 3 4 5 6 7 8 9 10 11 12 13 14 15 16	SALZMAN - DAY I Q. When did he cancel? A. It was probably between October and December in 2003. Q. Did he tell you he was concerned about the allegations? A. In Forbes Magazine mostly. Q. Did he mention anything besides Forbes Magazine? A. He didn't. No, I think it was Forbes Magazine. Q. Okay. The last name I think you gave me was Capra, Fritjof? A. Fritjof Capra. Q. Okay. Capra. And who is that? A. He's a scientist. He's a
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2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18 19 20	SALZMAN - DAY I A. It might have been a face-to-face conversation. Q. And what did he say? A. He was sorry. Q. Did he say why he was not going to have anything further to do with them? A. He said he was told not to by Steve Cooper. Q. And that relates to the Forbes article? A. They were told that they needed to discontinue their relationship with us. Q. Okay. The next name was Michael France. Is that the other partner at Kroll Zolfo? A. Yes. Q. And what was his conversation with you? A. The same one. Q. That he had been told not to have anything to do because of the Forbes article?	2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18 19 20	SALZMAN - DAY I Q. When did he cancel? A. It was probably between October and December in 2003. Q. Did he tell you he was concerned about the allegations? A. In Forbes Magazine mostly. Q. Did he mention anything besides Forbes Magazine? A. He didn't. No, I think it was Forbes Magazine. Q. Okay. The last name I think you gave me was Capra, Fritjof? A. Fritjof Capra. Q. Okay. Capra. And who is that? A. He's a scientist. He's a physicist. Q. And what was his relationship with NXIVM?
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2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18 19 20 21 22	SALZMAN - DAY I A. It might have been a face-to-face conversation. Q. And what did he say? A. He was sorry. Q. Did he say why he was not going to have anything further to do with them? A. He said he was told not to by Steve Cooper. Q. And that relates to the Forbes article? A. They were told that they needed to discontinue their relationship with us. Q. Okay. The next name was Michael France. Is that the other partner at Kroll Zolfo? A. Yes. Q. And what was his conversation with you? A. The same one. Q. That he had been told not to have anything to do because of the Forbes article? A. Correct.	2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18 19 20 21 22	SALZMAN - DAY I Q. When did he cancel? A. It was probably between October and December in 2003. Q. Did he tell you he was concerned about the allegations? A. In Forbes Magazine mostly. Q. Did he mention anything besides Forbes Magazine? A. He didn't. No, I think it was Forbes Magazine. Q. Okay. The last name I think you gave me was Capra, Fritjof? A. Fritjof Capra. Q. Okay. Capra. And who is that? A. He's a scientist. He's a physicist. Q. And what was his relationship with NXIVM? A. He signed up for training. I met him on a couple of occasions. He wrote probably about 10 books on quantum mechanics and physics.
2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18 19 20 21 22 23	SALZMAN - DAY I A. It might have been a face-to-face conversation. Q. And what did he say? A. He was sorry. Q. Did he say why he was not going to have anything further to do with them? A. He said he was told not to by Steve Cooper. Q. And that relates to the Forbes article? A. They were told that they needed to discontinue their relationship with us. Q. Okay. The next name was Michael France. Is that the other partner at Kroll Zolfo? A. Yes. Q. And what was his conversation with you? A. The same one. Q. That he had been told not to have anything to do because of the Forbes article? A. Correct. Q. Okay. And the next one is	2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18 19 20 21 22 23	SALZMAN - DAY I Q. When did he cancel? A. It was probably between October and December in 2003. Q. Did he tell you he was concerned about the allegations? A. In Forbes Magazine mostly. Q. Did he mention anything besides Forbes Magazine? A. He didn't. No, I think it was Forbes Magazine. Q. Okay. The last name I think you gave me was Capra, Fritjof? A. Fritjof Capra. Q. Okay. Capra. And who is that? A. He's a scientist. He's a physicist. Q. And what was his relationship with NXIVM? A. He signed up for training. I met him on a couple of occasions. He wrote probably about 10 books on quantum mechanics and physics. He was somebody who I met on a number of occasions

Page 157 Page 159

SALZMAN - DAY I

2.2

and I explained to him how it worked, and what it was about, he became excited about it and invited some other scientists that he thought would enjoy it and would want to work with us on a project that I wanted to do with him.

And then after we arranged the training, and planned, and I met several of the people that he suggested would be good, he had a conversation with one of the people who found the Rick Ross website and inspired him to believe it would be horrible for him to be associated with us. And he called me, very angry that I didn't tell him about it.

- Q. So, he never took any training with NXIVM?
- A. No. He cancelled about a week before the training was scheduled to happen.
- Q. Did he tell you who had told him that they found the Rick Ross website?
- A. He did. Her name was -- you know, I can't remember her name, but I could find it for you.
- Q. Okay. And did he say what about the Rick Ross website had disturbed him?

SALZMAN - DAY I

- Q. Do you know if the reporter from
 Forbes spoke to anybody from your organization,
 other than you and Mr. Raniere?
 - A. I don't recall.

- Q. Are you quoted in the Forbes article as saying there's probably no discovery since writing as important for human kind as Mr. Raniere's technology?
 - A. I don't remember.
- Q. Does it sound like something you said?
- A. I recognize the quote. I don't remember it was attributed to me.
 - Q. Have you said something like that?
- A. I think it's an amazing discovery.

I don't know that I've ever said that.

- Q. Getting back to the Kroll training with account managers. Did account managers provide feedback to NXIVM about what they thought of the training?
- A. What they thought of?
 - Q. The training?
 - A. Personally?
 - Q. Yes. First of all, does NXIVM,

Page 158

Page 160

SALZMAN - DAY I

- A. He told me that he thought I was legitimate, and it invalidated the legitimacy of what I had told him.
- Q. Did he say what on the Rick Ross website in particular had that effect?
 - A. The articles.
 - O. Which articles?
 - A. The Hochman and Martin articles.

(Exhibit Salzman 21 marked for identification.)

MR. KOFMAN: Salzman 21 is a document produced to us in discovery. And it's marked by Bates Stamp Nos. P-000004811.

Ms. Salzman, are you familiar with this document?

- A. I don't know who would make this document. I've never seen this before.
- Q. Are you involved in promoting NXIVM to potential students?
 - A. Yes.
- Q. Does NXIVM have any promotional materials that it uses?
 - A. We have an Ethos brochure, but that's all. I've never seen this before.

SALZMAN - DAY I

when it does corporate training, ask people for evaluations of the training, the people who take the training?

- A. Yes. Not always, but at times.
- Q. Did you ask Kroll Zolfo?
- A. Yes.
- Q. Do you remember what the responses were?

A. I remember in retrospect, 90 days after the program, in a meeting they were all sitting around talking, and they had the realization that all of them had had very positive results that they couldn't attribute to anything but the training.

And 90 days later, called my -- one of the people called my office to tell me that they all determined that it was a very beneficial training. I usually, at the end of such a training, have people fill out a comment sheet. And my guess is -- and I don't remember exactly doing it, but I remember that that was traditionally what I did do back then. I probably have those.

Q. You have the comment sheets?

	Page 161			Page 163
1	SALZMAN - DAY I	1		
2	A. I probably have them somewhere in	2	INDEX: WITNESS EXAM BY: PAGE:	
3	the notes from that training.	4	WITNESS EXAM BY: PAGE: N. Salzman Mr. Landy 5	
	<u>e</u>	5	Mr. Kofman 91	
4	MR. KOFMAN: I'd like to make a	6 7	EXHIBITS	
5	request for it. I'll send you a letter.	8	Exhibit No. Page	
6	MR. MC GUIRE: I thought written	9	Exhibit Salzman 1 Notice of Deposition 6 No Bates Numbers	
7	discovery was over?	10		
8	A. If I have them. If I have them. I	11	Exhibit Salzman 2 Letter dated 6/3/09 7 No Bates Numbers	
9	think if I took them, I have them. I can show you	12	Exhibit Salzman 3 Payment Register 26	
10	what I have.	13	Bates No. Interfor 00228	
11	Q. Did you incorporate any of these		Exhibit Salzman 4 Indemnity Agreement 47	
12	conversations that you've just testified to with	14	Bates No. Interfor 00168 - Interfor 00169	
13	Mr. Cooper and others in any documents you	15	merior ouro	
14	provided to Ms. Unterriener?	16	Exhibit Salzman 5 Letter dated 8/11/06 55 Bates No. Interfor 0564 -	
15	A. The conversations?		Interfor 0566	
		17	Exhibit Salzman 6 Invoice dated 9/19/06 60	
16	Q. Yes.	18	Bates No. Interfor 0364 -	
17	A. I just gave her the names of the	19	Interfor 0365	
18	people as I got them.	19	Exhibit Salzman 7 Invoice dated 10/6/06 60	
19	Q. Okay. Other than you, do you know	20	Bates No. Interfor 0367 - Interfor 0368	
20	if anybody gave Ms. Unterriener information only	21	mierioi 0308	
21	verbally, or did everybody else give her documents	22	Exhibit Salzman 8 Invoice dated 11/8/06 60 Bates No. Interfor 0374 -	
22	or give her information on those forms that she	44	Interfor 0375	
23	prepared?	23	Enhibit Calanna O Laurian data d 12/11/06 60	
24	A. I think most people wrote lists,	24	Exhibit Salzman 9 Invoice dated 12/11/06 60 Bates No. Interfor 0377 -	
25	and gave her the list, and they're compiled here.	25	Interfor 0378	
	Page 162	25		Page 164
		,		rage 104
1	SALZMAN - DAY I	1 2	EXHIBITS	
2	Q. Do you know anyone else who only	3	Exhibit No. Page	
3	gave her verbal information?	4	Exhibit Salzman 10 Invoice dated 1/11/07 60 Bates No. Interfor 0380 -	
4	A. I doubt it.		Interfor 0387	
5	MR. KOFMAN: Okay. This is a good	5	Exhibit Salzman 11 Invoice dated 2/14/07 60	
6	time to break.	6	Bates No. Interfor 0383 - Interfor 0384	
7	(Time Ended: 5:11 p.m.)	7		
8	(Time Ended: 5111 pinn)	8	Exhibit Salzman 12 Invoice dated 4/6/07 60 Bates No. Interfor 0389 -	
9		9	Interfor 0393	I
10		10	Exhibit Salzman 13 Invoice dated 5/7/07 60 Bates No. Interfor 0395 -	I
	NIANICW CALIZMANI		Interfor 0397	I
11	NANCY SALZMAN	11	Exhibit Salzman 14 Verified Counterclaim 67	I
12		12 13	No Bates Numbers Exhibit Salzman 15 Notice of Deposition 108	
	0 1 11 1 1			
13	Subscribed and sworn to	1.4	No Bates Numbers	I
14	before me this day	14	Exhibit Salzman 16 Amended Notice of 108	
14 15		15		
14 15 16	before me this day		Exhibit Salzman 16 Amended Notice of 108 Deposition	
14 15	before me this day	15	Exhibit Salzman 16 Amended Notice of Deposition No Bates Numbers Exhibit Salzman 17 Letter dated 8/26/05 113 w/Attachment	
14 15 16	before me this day	15 16	Exhibit Salzman 16 Amended Notice of Deposition No Bates Numbers Exhibit Salzman 17 Letter dated 8/26/05 113 w/Attachment No Bates Numbers	
14 15 16 17	before me this day	15 16 17	Exhibit Salzman 16 Amended Notice of Deposition No Bates Numbers Exhibit Salzman 17 Letter dated 8/26/05 113 w/Attachment No Bates Numbers Exhibit Salzman 18 Exhibit A 115 Bates No. SP2302 -	
14 15 16 17 18	before me this day	15 16 17 18	Exhibit Salzman 16 Amended Notice of 108 Deposition No Bates Numbers Exhibit Salzman 17 Letter dated 8/26/05 113 w/Attachment No Bates Numbers Exhibit Salzman 18 Exhibit A 115	
14 15 16 17 18 19	before me this day	15 16 17 18 19 20	Exhibit Salzman 16 Amended Notice of Deposition No Bates Numbers Exhibit Salzman 17 Letter dated 8/26/05 113 w/Attachment No Bates Numbers Exhibit Salzman 18 Exhibit A 115 Bates No. SP2302 - SP2309 Exhibit Salzman 19 Letter dated 4/6/05 123	
14 15 16 17 18 19 20 21	before me this day	15 16 17 18 19 20 21	Exhibit Salzman 16 Amended Notice of Deposition No Bates Numbers Exhibit Salzman 17 Letter dated 8/26/05 113 w/Attachment No Bates Numbers Exhibit Salzman 18 Exhibit A 115 Bates No. SP2302 - SP2309 Exhibit Salzman 19 Letter dated 4/6/05 123 w/Attachment Bates No. SP2049 -	
14 15 16 17 18 19 20 21 22	before me this day	15 16 17 18 19 20	Exhibit Salzman 16 Amended Notice of Deposition No Bates Numbers Exhibit Salzman 17 Letter dated 8/26/05 113 w/Attachment No Bates Numbers Exhibit Salzman 18 Exhibit A 115 Bates No. SP2302 - SP2309 Exhibit Salzman 19 Letter dated 4/6/05 123 w/Attachment	
14 15 16 17 18 19 20 21 22 23	before me this day	15 16 17 18 19 20 21 22 23	Exhibit Salzman 16 Amended Notice of Deposition No Bates Numbers Exhibit Salzman 17 Letter dated 8/26/05 113 w/Attachment No Bates Numbers Exhibit Salzman 18 Exhibit A 115 Bates No. SP2302 - SP2309 Exhibit Salzman 19 Letter dated 4/6/05 123 w/Attachment Bates No. SP2049 - SP2230	
14 15 16 17 18 19 20 21 22	before me this day	15 16 17 18 19 20 21	Exhibit Salzman 16 Amended Notice of Deposition No Bates Numbers Exhibit Salzman 17 Letter dated 8/26/05 113 w/Attachment No Bates Numbers Exhibit Salzman 18 Exhibit A 115 Bates No. SP2302 - SP2309 Exhibit Salzman 19 Letter dated 4/6/05 123 w/Attachment Bates No. SP2049 - SP2230 Exhibit Salzman 20 Worksheet 124	

	Page 165	Page 167
1		1
2	LITIGATION SUPPORT INDEX	2 ***ERRATA SHEET***
3		3 NAME OF CASE: NXIVM v. Sutton 4 DATE OF DEPOSITION: 6/8/09
4	DIRECTION TO WITNESS NOT TO ANSWER	5 NAME OF WITNESS: N. Salzman
5	Page Line Page Line	6 Reason codes:
6	(NONE)	 To clarify the record. To conform to the facts.
7	(1 - 1)	8 3. To correct transcription errors.
8	REQUEST FOR PRODUCTION OF DOCUMENTS	9 Page Line Reason
9	Page Line Page Line	From to
10	160 6	11 Page Line Reason
11		From to
12	INFORMATION TO BE FURNISHED	12 13 Page Line Reason
13	Page Line Page Line	13 Page Line Reason From to
14	(NONE)	14
15	(1/01/2)	15 Page Line Reason
16	QUESTIONS MARKED FOR A RULING	From to 16
17	Page Line Page Line	17 Page Line Reason
18	(NONE)	From to
19	(1(01,2)	18 19 Page Line Reason
20		From to
21		20
22		21 Page Line Reason From to
23		22
24		23
25		24 NANCY SALZMAN
	Page 166	
1		
1 2		
3	CERTIFICATE	
4	STATE OF NEW YORK)	
5)ss:	
6	COUNTY OF NEW YORK)	
7	I, JOMANNA DeROSA, a Certified	
8	Shorthand Reporter and Notary Public within	
9	and for the State of New York, do hereby	
10	certify:	
11	That NANCY SALZMAN, the witness whose	
12	deposition is hereinbefore set forth, was	
13	duly sworn by me and that such deposition is	
14	a true record of the testimony given by such	
15	witness.	
16	I further certify that I am not	
17	related to any of the parties to this action	
18	by blood or marriage, and that I am in no	
19	way interested in the outcome of this	
20	matter.	
21	In witness whereof, I have hereunto	
22	set my hand this 18th day of June, 2009.	
23		
24		
	JOMANNA DeROSA	
25		

				1496
	administrative	ahead	33:14,16 50:6	62:14
<u>A</u>	84:10	12:16 112:5,10	91:14	approve
abide	advance	airport	answer	25:25 26:6,9,14
43:3	92:15,17 96:20	136:25	6:18 7:5,11 8:12	26:16 61:17,19
able	140:5	alaska	8:16 12:16 18:10	63:3,11,14
87:16	adverse	104:24,25 105:5	31:7 65:18 69:13	approved
academic	72:9	104.24,23 103.3	84:11 85:16 94:13	62:17 64:10
9:18,18	advice	albany	96:2 103:25	approving
accept	21:10 42:22 58:16	16:20 80:18,19	104:11 106:14	28:2
42:22	58:17 114:24	10.20 80.18,19	116:23 165:4	april
access	advise	144:14 152:10,11	answered	65:24 66:11,16
132:23,24	83:20 84:20,21	· ·	31:7	
accompany	98:23 99:3	alejandro		68:3 73:11 119:24 120:3
80:23		128:7 154:24	answers	
accompanying	advised	155:8	6:20,24 8:22	area
86:16,17	57:25 58:4 83:15	alex	48:19,20 84:3	42:16 100:20
account	151:16	14:17 119:4	anthony	102:20
135:11 159:19,19	affairs	alias	113:16	areas
accounting	75:6	81:16	anticipated	100:22
84:5	affiliated	allegations	42:16	arlin
accrued	119:19 125:16	72:12,17 132:19	antonio	153:5,6
65:13	142:4 144:18,19	155:25 156:6	127:25 147:15	arrange
acknowledge	151:8	alleged	anybody	69:18
129:25	affiliation	102:7 114:7	31:18 33:6,21	arranged
act	146:22	125:17,21 143:20	35:6 46:15 47:4	152:8 157:7
21:4	afford	allow	49:5 53:21 71:3	article
acting	150:5	7:4 103:25 152:21	76:8 92:9 94:19	46:10,11 52:4
134:11	agent	152:23	106:10 115:14	54:5 76:17 81:17
action	103:4	allows	118:16 125:7	81:24 87:18,24
1:4 67:16 86:14	ago	101:21	159:3 161:20	88:6 91:21 92:3
86:16 99:6 129:3	9:7 10:15 29:6	amazing	anymore	92:14 96:6 98:5
129:8 166:17	34:11 41:10,10,10	159:16	73:9 96:16,18	98:16 99:4 100:16
actions	107:16 136:25	amended	146:24	105:18 137:20,21
75:19 112:13,18	140:17 141:5	108:20 164:14	apart	137:22 138:4,19
112:24 114:7	agree	amicable	52:22	139:23 141:23,24
116:19 117:4,18	57:23 96:13,14	129:19,21	appalled	141:25 142:7
128:16	102:18 130:4	ammermans	85:12	149:6,13,19,20,23
actual	agreed	32:21	appear	151:11,13,16,19
39:4,24	5:3,7,11 57:21	amount	97:12 131:2	154:11,21 159:7
actuary	89:24 90:12 99:10	62:13 65:11,12,15	appearance	articles
121:17	102:4	130:6	151:25	83:3 105:15,17,21
adam	agreement	amounts	appeared	105:22 137:19
127:14 141:13	47:18,25 48:23	28:3,6 64:22	86:13 90:11 98:17	147:8 151:25
added	49:5,11,17 50:4,7	anchorage	105:21 137:23	158:7,8,9
124:7	50:11,19 51:12	104:24 105:4	appears	aside
adelman	54:9,11 55:13	angela	25:3 27:15 48:11	28:11 34:6 47:7
4:15 6:12 55:16	57:7 58:2,18 59:6	131:10,16	56:14 62:20 79:2	51:16
57:15,19 61:21	62:11 64:23 67:11	angry	116:9	asked
62:19 67:7	106:13 163:13	157:13	appointed	25:25 26:16 31:6
administer	agreements	anna	134:7,11	36:4 46:2 49:17
5:14	56:25 57:11	1:17,20 4:16 25:4	appreciate	51:11 54:20 60:5
J.11				

62:10 70:6 100:8	attention	101:11	163:12,14,16,18	80:13,21 82:5,11
101:22 108:4	7:24 25:6 38:18	avivs	163:20,22,24	83:6 86:24 87:5
121:9 125:6	55:18 63:9 68:22	40:25 41:2,25	164:4,6,8,10,12	97:14 98:4 103:22
137:11 140:2,5,6	84:24 85:2	42:5,9 54:12	164:13,15,17,19	105:3,9,9,17
140:19 152:7	attorney	aware	164:21,23,25	107:23 121:6
155:8	6:11 8:3 20:6,10	37:6,9 57:11 69:7	bear	122:16,17 123:8
asking	20:12,12,19,22	74:24 117:10	7:17	124:25 129:12
7:2 104:14 127:20	21:6,15 58:19,21	142:22	bearing	130:24 132:21
127:20	58:22 89:4 92:24	awful	26:21 47:9 55:4	133:21 134:25
asks	102:7,12,25 103:5	72:13	60:9,12,15,18,21	135:4,16 139:16
18:23	102.7,12,23 103.3	72.13	60:24	140:14 141:12
assert	attorneys	В	bears	146:7 151:21
102:16	4:4,8,12,15,19 5:4	back	24:24 46:18 55:19	155:14 157:11
asserted	21:15 23:2,22	23:15 34:5 36:8	61:2,4	believed
103:21	29:11 31:3 58:5,6	41:15 48:6 54:8	,	
	· · · · · · · · · · · · · · · · · · ·	59:5 62:5 84:6,24	becoming 136:8 143:22	20:11,12 29:10,19 35:21 144:20
assigned 120:21,23	58:8,15 72:24	88:15 89:10 104:5		
,	83:20 94:5,6	108:9 110:9	beg 43:16 115:21	believes
assist	attribute	118:14 129:5		19:10
102:14 103:6	160:14	134:3 137:3	began	belongs
assisted	attributed	139:20 144:4	17:24 29:22 100:4	103:20
119:2	85:24 88:16 96:7	147:23 148:12	105:3 120:19,20	beneficial
associate	159:14	159:18 160:23	127:10 134:18	160:18
136:22	audible	bad	beginning	best
associated	152:18	144:17	67:20,25 135:23	6:24 45:18 51:13
157:12	august	balance	150:21	52:7 104:8,13
associates	52:10 56:4 113:15	64:18,21 65:6,8	begins	117:11,19 133:20
9:12	114:22	66:11,12,16,17	52:19,22	betancourt
assume	authorization	bank	behalf	14:17 119:4
76:6	100:18	32:22	8:7,24 21:5 75:7	better
assumed	authorize	bankruptcy	86:21 87:3 93:14	75:15
31:20 90:13	87:2 93:9,12	32:23	93:20 97:9,13	beyond
assuming	authorized	barbara	101:22	101:19 104:2
58:10	5:13 84:14 86:20		belief	149:5
assumption	93:20 97:8,16	119:3,8,16,21 128:15,21 131:15	118:17	biddle
147:10	authorizing	bargain	believe	4:12
attached	94:3	58:12	8:3,4 12:24 19:13	bill
25:5 113:17	avenue		20:20 21:2 22:2	65:6 111:8
attaches	4:5,9	barry 4:18	23:6,11,17 24:7	bills
102:23	aviv		25:21 26:4 28:5	61:11,14,17 65:12
attachment	1:17,19 4:15 6:13	basically 140:4	28:10,18,20 29:23	107:5
164:17,21	23:8,10 28:12		30:12 33:25 35:21	bind
attempt	29:3 33:10,15	basis	38:17 41:20,22	111:18
46:9 69:20	34:19 35:6,19,21	26:10,13	44:7 45:4 49:6	binds
attempting	36:22 37:14 38:25	bates	50:5,8,16 57:9,21	111:15
22:19	42:11 45:25 47:19	24:24 26:22 46:18	57:25 58:5,20	bit
attend	49:14 50:3 54:22	47:10 55:4,20	59:3,7,9,11,18	117:22
75:5 77:11 134:16	72:6,21 79:16,17	60:9,12,15,18,21	63:5,17 64:11,12	blood
attended	80:14,16 83:8	60:24 61:3,5	64:13,24 65:19,21	166:18
86:15 126:15	85:13 89:24 90:8	115:19,25 123:10	67:25 68:12 69:24	board
135:7	90:9,17 91:16	158:14 163:9,11	73:11,19 79:7	14:10,14,22 120:9
	I	I	I	I

				rage
120:10	26:14	cancel	changed	clear
bonuses	building	156:2	10:17 11:8,14	40:23 52:23 79:10
15:19	122:5	cancelled	12:22 99:13	81:20 90:5 101:25
books	bunch	116:10 155:22	changing	108:7
150:11 156:22	37:23	157:17	100:21	client
boone	burgeron	capacities	charge	27:8,9,11,22
119:3	146:10,11	8:23	122:23	103:14 117:18
boston	business	capacity	charged	clients
127:25 145:8,10	10:4 17:11,13	8:7,10,20,20 12:3	137:9	49:20 106:18
bottom	19:13 20:6 21:7,8	18:2,4 21:16 61:9	check	112:13,23,24
52:19 85:9	21:9,18 24:5 27:5	capitol	62:13 130:6	114:4,6,11,13
bouchey	51:4,8 83:13	19:14	checked	116:19 117:4
119:4,16,21	122:19 123:15	capra	50:16	122:20,20 127:18
128:15,21 130:15	142:19 144:14,18	131:4 156:13,14	chiappone	close
131:7,21	144:20	156:15	119:4	51:15 105:20
bought	businessman	carole	children	closely
134:8	81:9	146:10	147:12 155:9	121:7
boyfriend		case	chronic	coach
77:17,25 79:6	C	25:12,13 29:12	10:3	134:18 135:12,15
boyfriends	cab	37:15 53:17 62:13	church	142:17,18 145:16
78:9	130:10	72:14 94:19,25	73:25 74:6,17	145:19 148:23
bracketed	calculator	115:15 128:17	circumstances	coached
68:23	66:8	167:3	17:8 19:21 98:7	145:17,20 148:22
break	california	categories	cities	148:25 149:3,5
7:8,12 46:4 59:23	99:23 100:12,16	125:7	155:5	150:8
67:6 93:6 95:12	150:24	center	city	coaches
162:6	call	4:19 10:17,18,23	135:6 152:5,17	131:18
brief	22:5 110:9 135:25	10:23 11:7,8,9	155:12	coaching
9:20	136:15,19,19,20	80:17,22	civil	13:23 127:12,17
briefly	136:21 138:2,6	ceo	1:4 108:19,22	134:13 135:18
54:8	140:5,13,18,21,23	127:11 134:12	claimed	136:12 137:4
bring	141:22 142:15	certain	36:10,22 113:7	138:11,12 140:3
37:15 72:13	146:14 149:12	19:9 73:8 77:7	claiming	141:8,11,21
bringing	called	124:9	38:22 92:4 113:6	142:12 153:15
72:17	6:4 10:16,16 11:7	certainly	claims	155:21
broadway	22:7 44:21 73:15	40:16 123:20	37:3 117:3	codes
4:16	73:18 83:18	certificate	clare	167:6
brochure	127:11,14,14,17	166:3	14:18 87:5 93:24	cody
158:24 164:24	136:24 140:19	certified	95:17 100:3,5	131:11
bronfman	141:5 145:24	3:10 130:6 166:7	108:7	collected
14:18 87:5,6	146:2 149:6	certify	clarify	75:23
93:24 94:8,11,24	150:12 151:2	166:10,16	89:22 167:7	collection
95:17,21,24 100:3	155:3 157:13	chain	class	76:2,9,13
106:2,5 107:3,23	160:16,17	87:16	114:10	college
107:24	camera	challenge	classes	9:11
brought	152:21 153:4	43:13	13:23 114:6	combined
38:17 71:14 72:6	campaign	change	116:18 117:3,10	9:13
82:6 126:18 146:8	99:11	10:17,18,23,24	125:15 134:15	come
152:15,21 153:3,4	campus	11:8,9 12:20,21	138:24 139:7	20:21 23:12 29:21
budgets	4:13	83:6	142:11	34:5,18 36:7,8,9
	<u>I</u>	<u> </u>	l	l

66:20 69:16 92:15	109:18 110:4	76:9,13 101:20,22	117:25	138:22 139:3,7
97:14 115:17	116:10 118:10,18	108:24 114:15	contend	153:15 154:9
116:11 144:4	120:20,22,22	122:14,19 123:15	112:24 129:2,6	161:13
155:16	127:13 128:6,24	concerns	content	coopers
coming	129:17 132:15	75:19 92:8	44:17 112:16	139:14 153:11
88:3 137:3 151:16	134:19 142:4,22	conducted	123:14	coordinate
156:24	142:23,24 145:10	110:13	contents	75:10 120:16
comment	145:11 147:22	conference	40:6	coordinated
160:20,25	153:19	96:23 97:13,15	contest	31:2
commerce	compensated	confidential	7:10	copies
120:24	15:9,13,14 19:4,7	140:3,20,21,23	continue	133:4,7,9
commissioner	compensation	141:2	135:12 148:23	copy
128:2	15:25	confirm	151:4	25:22 59:16 62:11
commissioners	compilation	62:10	continued	82:6 152:20
149:18	25:3	conform	144:19	corner
committee	compile	167:7	continues	52:15
14:5,6,7,7,8,8,9	117:22 120:21	confronted	117:6	corporate
14:12,13,16 15:2	122:9	106:8,15	continuing	8:21 24:7,8,10
15:4 87:7,10	compiled	connecticut	43:9 56:22 72:7	28:21 125:9,11
committees	117:6,24 123:2	9:24	85:18 124:5	127:18 160:2
13:20 14:2,3 15:7	161:25	connection	contribute	corporation
communicate	compiling	30:22 54:10 57:16	128:11	1:5,23 8:8 108:18
93:10	118:15 121:5	57:20,22,24 58:25	controversial	111:15,18,22
communicated	126:6	61:21 63:11 75:20	136:8 137:8,16	148:10
126:13	complete	102:14	controversy	correct
communication	77:10 110:5,7	consistently	150:4 151:6,10	10:25 18:14 40:7
14:8 136:13	completely	72:14	conversation	41:21 44:6 48:13
communications	70:7 109:23	constitute	34:2 40:5,9,10	48:15 49:21,24
33:2 46:20,24	comprising	116:17 117:2,9,13	41:23 43:11 44:18	71:16 75:11,12
78:9 79:5,9 90:23	36:24 38:23	117:16	70:18 74:19,21	87:7 105:24 114:8
102:19,24 103:3	concepts	construction	82:25 86:11	120:2 125:23
120:9,10,11	17:3,5 19:3	145:9,12	135:22 136:4	126:2,3 127:21
community	conceptual	consult	139:21 143:9,12	130:21,22 147:15
144:14,15,17,22	10:6 16:23,25	95:13,16 99:24,24	144:23 145:22	149:22,25 152:25
companies	17:12 18:18	consultant	150:3 153:21,25	154:22,25 167:8
10:12,20 11:2	concern	10:4 19:13 20:7	154:3,17 155:17	correctly
company	37:3 72:13 73:2	21:7,8,9,18 81:11	157:10	57:4
8:24 10:6,14,16	91:22 96:9 111:11	82:10	conversations	corrupt
11:6,10,19 12:5,6	concerned	consultants	41:24 48:19 70:15	89:4,5,7
12:8,11,21 13:21	37:4 96:6 146:21	21:11 26:7	94:2 102:6 127:4	counsel
13:22 15:3,6	155:24 156:5	consulting	137:2 143:21	48:20 75:10
16:24 17:4,4 18:2	concerning	10:19,22 13:24	145:2,4 161:12,15	114:24 116:4
18:12 20:14 21:11	8:17 27:2 29:3,13	93:23 94:5 127:13	convince	count
21:12 23:11 24:11	32:19 33:2 35:19	153:18	69:9,20	16:11,13
24:15,18 28:15	36:11 38:15 39:22	contact	120.5 (152.10	counterclaim
29:2,18 30:17,18	40:11,25 41:16	34:19 35:6,19	128:5,6 153:10	67:15 164:11
35:23 36:4 37:18	42:5 44:5,9 46:3	73:9 75:2	cooper	counterclaimdef
37:23 44:20 45:22	47:3 48:18 49:5	contacted	127:11 128:5	1:18
47:19 49:14 85:12	50:4,7 58:17	83:14 88:4	134:4,8,9,21	counterclaimplai
99:20 100:21,23	70:16 71:2 74:22	contained	135:13 137:6	1:14
1	-	-	-	-

				1490 5
county	63:2,25 64:3	15:1 16:1 17:1	162:1,14 166:22	deprogrammer
166:6	120:7	18:1 19:1 20:1	days	22:19
couple	currently	21:1 22:1 23:1	40:15 41:10 50:23	deprogramming
29:7 48:18 79:24	13:2,12 14:4	24:1 25:1 26:1	50:24 59:12 130:5	37:15,17
85:6 93:7 131:2	16:11	27:1 28:1 29:1	160:10,16	derosa
141:11 143:21	curriculum	30:1 31:1 32:1	daytoday	2:7 3:9 166:7,24
156:21	13:21	33:1,16 34:1 35:1	15:5,8 75:6	describe
course	custodian	36:1 37:1 38:1	deal	9:8
9:18,19 27:5 58:8	111:11	39:1 40:1,16 41:1	83:4	design
80:9 102:15	cut	42:1 43:1 44:1	dealing	127:15 141:16
courses	6:24	45:1 46:1 47:1	75:15	designate
9:17 147:19	cutting	48:1 49:1 50:1	dealings	111:18
court	73:9	51:1 52:1 53:1	148:18	designated
1:3 5:16 53:3		54:1 55:1 56:1	death	108:23 109:17,22
55:2 60:5 86:14	D	57:1 58:1 59:1	28:25 30:2 42:13	110:4 111:22
86:16	dalai	60:1 61:1 62:1	december	118:10 129:11
courtesy	107:18	63:1 64:1 65:1	63:15 96:24 156:4	dessert
6:25	damage	66:1 67:1 68:1	decided	79:24
courts	144:22	69:1 70:1 71:1	99:24,25	detailed
16:17	damages	72:1 73:1 74:1	decision	65:14
cover	112:13,17,25	75:1 76:1 77:1	23:19,21 90:19	determine
25:4 48:9	129:11	78:1 79:1 80:1	132:17 144:2	66:10
covered	danzig	81:1 82:1 83:1	dee	determined
103:6,8,16 127:3	4:3 92:24	84:1 85:1 86:1	19:23,24	160:18
covers	dash	87:1 88:1 89:1	deeply	develop
103:10	27:19	90:1 91:1 92:1	146:19	13:21 19:3
cowell	data	93:1 94:1 95:1	defendants	developed
131:10	31:22 72:7,10	96:1 97:1 98:1	1:12,24 111:10	17:3
created	79:8,12,12,15	99:1 100:1 101:1	125:16 128:17	developer
121:19 147:13	118:13 122:24	102:1 103:1 104:1	129:3,7 132:20	127:24
149:24	date	105:1 106:1 107:1	define	developing
creative	54:23 98:5 113:8	108:1 109:1 110:1	18:8	99:12
127:15 141:16	117:8 124:2,9,9	111:1,2 112:1	degree	develops
credibility	167:4	113:1 114:1 115:1	9:12,15,19,22	19:2
94:23	dated	116:1 117:1 118:1	demand	dharamsala
criminal	33:24 113:15	119:1 120:1 121:1	129:23,24 130:5	107:19,20
32:20	163:10,15,17,19	122:1 123:1 124:1	department	dharmala
crossclaim	163:21,23 164:3,5	125:1 126:1 127:1	148:4	107:17
1:24	164:7,9,16,20	128:1 129:1 130:1	deposition	difference
crossclaimants	dates	131:1 132:1 133:1	2:2 3:6 5:12 6:16	66:10,15,16
1:21	28:3,8 34:16	134:1 135:1 136:1	8:11 43:4 68:20	differences
crossexamination	daughter	137:1 138:1 139:1	108:18,20 109:4	98:12
92:19	69:25 70:2,5,12	140:1 141:1 142:1	110:5,7,20 111:14	different
crossexamine	70:17	143:1 144:1 145:1	112:9 163:9	10:2,10 100:22
109:8	dawn	146:1 147:1 148:1	164:13,15 166:12	103:2
csr	119:3,15,18 120:7	149:1 150:1 151:1	166:13 167:4	dinner
2:7	day	151:14,17 152:1	depositions	79:21,22,24 80:6
cult	2:2 3:6 6:1 7:1	153:1 154:1 155:1	109:20	80:10,12,21
22:18 70:3	8:1 9:1 10:1 11:1	156:1 157:1 158:1	deprogram	direct
current	12:1 13:1 14:1	159:1 160:1 161:1	22:20 70:4	7:23 68:22 84:24
				l

				1490
85:2 91:4	80:5,10 82:20	115:13 116:2,5,7	early	134:20
directed	90:10 92:10,11	118:7 124:18	30:9 80:13 98:4,6	entire
108:6,6 109:24	93:8 100:2 106:2	158:13,16,18	134:25 146:4,16	51:24 116:17
direction	132:12	documented	ease	117:2,9,16 122:17
165:4	discussing	72:11	32:13	124:11 147:21
directive	23:24 39:15,17	documents	edgar	entirety
149:17	67:6 76:23 88:16	25:3 60:2 61:7	119:3	64:21
directly	96:20 132:8	67:15 78:19	editor	entitled
14:21,22 34:20	136:10 140:22	109:21,24 111:11	127:15 141:16	67:15
44:14 77:2 100:5	150:17	111:12 113:18	educational	errata
118:19 125:12	discussion	122:6,8 123:7,12	9:9 14:7	167:2
127:7,8,17,23,25	7:19 38:12 54:24	161:13,21 165:8	effect	errors
128:3,10 150:6	71:9 95:11 152:6	doe	5:15 158:6	167:8
directors	discussions	1:17	effort	esp
14:11,14	22:11,14,17 32:25	doing	29:20	11:4,12,24
disappearance	38:10,11 42:4	9:25 22:10 32:3	eight	esq
30:3 42:12 105:14	47:3 49:4 70:25	42:15 96:16,18	60:6 130:17	4:6,10,11,14,17
105:16,22	71:5 90:14 91:5	98:24 99:12 100:6		4:21
disappeared	93:10 94:4	100:10 104:9	35:10 39:11 52:15	establish
105:5	distinction	135:13 153:17	84:20 90:3 124:25	41:8
disclose	74:10	155:21 160:22	125:9 137:2	establishment
132:8 140:6,7	distraught	dolan	152:13	74:12,14
disclosing	70:2	4:11	elapsed	estate
95:3	distressing	dones	50:18	100:14
disclosures	138:21	119:5 120:2	ellen	esther
115:5	distribute	129:15,16 130:18	131:10	119:4
discontent	81:20	131:7,20	email	ethics
72:21 132:14	district	door	42:25 43:2	14:8
discontinue	1:3,3 19:14	106:7	emiliano	ethos
136:8,12 137:8,12	disturbed	doubt	14:18	158:24
137:12 154:13	92:7 132:4 138:19	162:4	employees	evaluate
discontinued	143:18 146:20	drafts	135:10	114:24
127:12	151:20 157:25	49:2	employment	evaluations
discovery	dividends	drinker	9:21	160:3
116:3 123:8	15:21	4:12	emyth	evening
158:13 159:7,16	division	drive	150:12,12	79:23 108:8,10
161:7	120:24	4:13	ended	events
discuss	document	due	20:22 98:8 100:11	87:16 114:15
28:22 32:18 33:6	7:25 24:21 26:21	63:2 64:2,3,18,21	142:15 162:7	120:19 121:3
33:10,17,20 35:5	27:3,3,6 28:11	64:22 65:8,11,15	endurance	everybody
38:6 39:12,18	41:17 47:9 48:18	66:11,12,16,17,21	7:9	43:12 106:12
42:2,10 46:14	51:17,21,24 52:2	duly	engagement	144:15 161:21
49:8 50:10 68:6,9	53:3,9 55:4,9,19	6:5 166:13	25:5,7	everybodys
76:17 82:19 85:25	56:2 60:9,12,15	duplication	enjoy	32:13
86:4 91:17 92:8	60:18,21,24 62:7	112:8	157:4	exactly
93:13 96:19 137:3	62:25 63:10 67:16	$\overline{\mathbf{E}}$	enrollment	30:8 32:9 34:24
discussed	67:17 68:6,10,14	earlier	14:6 116:11	110:18 160:21
33:5,8,12 41:20	68:16,22 79:2	41:20 106:3	118:19	exam
42:8,18 49:6 50:8	81:22 109:16,16 113:3,20 115:10	128:14 132:6	enron	163:3
53:21 76:21,22	113.3,20 113.10	120.11132.0	127:11 134:6,12	examination
	•	•	•	•

				Page
6:8 92:22 110:14	56:25	12:2	figure	68:19 69:23 75:25
examine	existing	fairly	87:16	78:6,15,22,23
109:7	114:4,5 122:19	6:15 80:13 85:4	figures	80:15 81:17 82:3
examined	expanded	101:25	27:18	85:19 91:20
6:6 109:12	72:16	falk	file	103:15 108:21
exception	expanding	96:24	123:18	111:9 112:12,16
64:20	42:15	fall	filed	112:22 113:14
excited	expect	75:2 84:8	67:16,22,24	134:5 136:18
156:24 157:3	53:19	fallon	files	146:17 151:12
excuse	expected	127:23 142:16,21	121:20,23 122:3	152:6 159:25
115:12	27:4	143:5,25 144:24	122:13,16,21	fit
executive	expenses	fallons	123:15,23 124:11	125:7
1:5 10:7 12:17,18	95:25 106:3,10	143:4	filing	five
13:20 14:2,2,4,5,7	107:12,25	familiar	5:5	130:5
14:12,13,15 15:2	experiences	21:21 158:15	fill	fiveday
15:4 87:7,10	100:7	family	125:8 160:20	104:25 134:17
148:12	expert	22:6,12 101:14	filled	florham
exhibit	115:5	102:9 146:19	121:19	4:13
6:2 7:15,20,24	explain	147:5,13	final	focus
8:13,14 24:22,24	137:15	fare	62:8	25:6 63:8 117:21
25:2 26:21,23	explained	130:10	finances	follow
27:21 28:7 41:17	157:2	fax	32:2	93:7 98:24 118:9
46:14,18 47:8,12	express	48:9,12 50:25	financial	120:23
47:15,20 48:7	72:20 75:18 96:9	51:4,7	112:22 113:5	followed
51:19 54:9 55:3,6	expressed	faxed	find	99:14
57:8 59:5 60:3,8	72:23 120:25	25:4	29:17,19 35:22	following
60:11,14,17,20,23	extended	february	37:17 51:14 94:18	52:20 85:18 100:7
61:2,4 62:5,23	100:22	64:2,7	118:8 146:13	126:14
63:8,22,23 64:15	extensive	federal	157:22	follows
65:25 66:5 67:3	110:14	108:19,21	fine	6:7
67:12,14 68:15	extent	feedback	43:25 53:5,9	forbes
81:21 82:4 84:25	33:2 59:19 102:10		56:20 136:23	46:9 137:20,22
91:21 108:11	103:8,21	feel	finish	138:19 139:2,6,11
113:11,23 114:2,9	extra	51:23	7:5 11:17 111:20	139:23 141:25
113.11,23 114.2,9	111:2	feeling	firm	142:7 149:6,13
117:14 123:4	111.2	42:17	114:24 115:2	151:11,12,16,25
124:16 127:5	$\overline{\mathbf{F}}$	fees	firms	154:10,21 156:7,9
158:10 163:8,9,10	facetoface	58:19,25 94:12,18	114:18	154.10,21 150.7,9
163:12,13,15,17	154:2	94:19 95:3	first	force
163:19,21,23	facilitator	fell	1:6 6:16 10:3	5:14 98:22
164:2,3,5,7,9,11	133:2,5,8,10	52:22	11:20 17:6,15	foregoing
164:13,14,16,18	fact	field	19:19 21:24 22:24	62:11
164:18,20,23,24	37:19 39:14,18	118:17,21,25	25:8,11 27:23	form
exhibits	58:24 72:15 79:5	119:11,14,15,16	28:14,17 30:6	5:8 12:15 15:14
60:6 113:2 114:22	87:19,25 88:7	120:3 121:8 122:8	31:10,13,15 32:15	15:23 19:8 41:8
116:14 121:5	92:6 98:20 109:8	120.3 121.8 122.8	38:4 39:7 42:3,8	48:9,23 64:25
122:15 125:24	111:14,19 149:23	124.23 123.4,13	45:19 46:12 48:22	69:12 97:10,21
126:6 131:2 163:7	facts	131:15,16	50:19 51:12,20	124:21 139:4
164:2	167:7	fight	52:6 53:24 54:22	formed
exist	fair	146:24	55:9 64:16 67:19	10:13 11:3 12:14
		110.21	33.7 01.10 07.17	10.13 11.3 12.17

l I			i e
forms furnished	6:15 12:16 21:8	128:15 137:7	157:18
161:22 165:12	41:15 81:12 96:21	144:25	happened
forth further	106:17,17 110:23	guess	37:20 41:12 45:3
132:17 166:12 5:7,11 27:10 89:2	112:5,10 132:2	13:17 21:15 34:17	45:24 155:14
forum 92:20 153:23	134:3	41:4 54:6 85:15	happening
18:23 154:7 155:18	goes	130:10,11 147:6	73:2 144:16
forward 166:16	94:23 102:19	160:21	hard
56:20	122:22	guire	100:23
found G	going	7:17 11:23 12:2	harm
38:16 157:10,20 gander	6:15 8:21 15:12	12:15 13:14 17:18	112:22 113:5
founder 106:21	22:12 24:20 25:6	18:5,9 27:13 31:6	harold
10:7 16:23 17:2 gateway	25:14 26:20,25	31:13 40:21 42:24	4:6 92:23
17:12 18:18 4:19	32:12 35:23,25	43:8,16,21 44:2	head
four gather	36:3 37:15,16	44:10 52:24 53:5	6:19 26:19 101:5
4:19 80:2 82:18 29:11,16 35:23	41:15 46:4,7,9	53:11,15,22 57:17	131:16
132:5	48:17 51:17,21	58:7,14 59:22	heading
132.3	53:10,13 54:8,25	64:5,25 65:9,17	46:19,23
fourth gathered 37:23	59:25 68:13,22	66:19 68:11 69:11	,
30.23	76:6 80:17 83:19	70:13 85:15 89:9	headquarters 4:5
21.3,17 21.13	01.23 03.2,0	91:2 94:13,16	health
31.301.7	87:19,24 88:9,15	95:4,8 96:2 97:10	17:14 128:2 148:5
Ti direc	71.10 / 1.11	97:21 103:24	hear
120.0 133.10	101:19 103:21	106:6,12 108:2	28:24 35:18 39:4
10.11	106:14,19,22,24	109:3,25 110:6,13	94:20 106:18
Tuneo	108:2 110:8,8,23	111:16,24 112:4	129:5
1.10 1.198.2,11	111:3,20 130:7	115:3,10,13,17,21	heard
101.7 101.12,10	143:8 152:19	116:20 120:18	21:24 22:21,24
112.11,12	153:5,22 154:6	123:16 128:18	23:8 35:3 39:3
frank getting	good	129:5,9 139:4	44:20 69:23 75:25
81:6,7,8 89:18 20:16 104:10,14 92:12 93:9 12 125:4 139:20	6:10 36:6 70:24	161:6	76:4 78:6,15,22
72.12 73.7,12	106:20,21 157:9	H	80:25
95:22 96:8 100:23 159:18	162:5	half	hearing
friedman gibson	goodly		78:23
4:15 6:11 55:16 131:11	110:17	111:20 132:10	held
57:14,18 59:15 give	goose	135:17	3:7
61:20 62:18 67:7 6:17 7:5 9:20	106:21	halfway	heller
friend 79:12,12,15 84:7	gotten	52:21	23:2,3,18
17:10 89:24 90:7,13	79:7	hand	hello
friendly 125:3,10,11,11	governor	166:22	136:24
136:20 149:8 152:19	149:16 150:7	handle	help
fritjof 161:21,22	graduation	94:7	82:25 100:21
131:4 156:13,14 given	9:10	handled	122:8 126:11
front 8:22 110:25	great	109:5	127:2
7:14 48:6 65:23 138:22 139:17	83:4	handwriting	helps
full 149:17 166:14	grief	56:8 57:3	53:17
9:3 85:19 glassman	11:7	handwritten	hereinbefore
function 127:14 141:13,15	ground	56:8,12,21	166:12
14:24 15:3 gleason	6:15	happen	hereunto
funding 113:16	group	22:12 34:23 88:9	166:21
29:20 go	119:13 120:5	117:7 127:10	high
	<u> </u>	<u> </u>	<u> </u>

				1496
9:10	idea	incorporated	56.12 15 16 17 19	75.11 15 22 76.0
		incorporated 6:13 12:18 22:22	56:13,15,16,17,18	75:11,15,23 76:9 76:13 77:3 79:13
highly 29:10	35:5 36:6 70:8,9 70:24 71:14 88:3	27:23 33:22	inperson 28:16,18	80:8 83:8 85:3
29:10 hire	identification	incorrect	inquiries	89:7 90:20,23
20:18 23:4,20	6:3 7:21 26:24	109:14 111:9	83:11 84:15	91:5,11 101:16
,	47:13 55:7 60:4	incurred		163:12,14,14,16
45:22 57:14,17,18 72:19 82:24 90:20		113:24	inquiry 84:19	, , ,
	67:4 108:12	- '		163:16,18,18,20
95:22 101:9 134:22 148:8	113:12 115:9 123:5 124:17	indemnification	inspire 126:11 149:17	163:20,22,22,24
	123:5 124:17	56:25 57:7,10		163:24 164:4,4,6 164:6,8,8,10,10
hired		indemnity 47:18 51:11 54:9	inspired 72:7 157:11	interfors
20:11 23:7,13	identified			
24:12,14,15 28:15	27:9 109:15	58:2 67:11 163:13	instances	24:5 30:22 34:8
29:19,25 45:17,19	115:11,14,25	independent	100:15	54:11 58:18,22,25
70:4 71:24 72:2	122:15	98:10,21,22 99:6	institute	61:14 73:5 75:6
86:22 87:4 93:24	identify	index	1:9 4:8	75:19 76:19 77:12
100:9 102:13	59:24 149:9	163:2 165:2	instructions	78:4 90:7 101:22
103:5 114:23,24	ikver 131:12	india	93:4 125:3	internal
115:2 134:18	- '	107:18	intended	27:6
147:21,23,25	image	indicate	116:14	internally
hires	45:13 46:7,11	147:4	intending	27:16
89:5	83:6 99:14 100:22	indicated	20:17	international
history	imagine	96:6	intensive	10:18,23 11:9
9:9,21	32:8,9 40:17	indications	134:17	internet
hochman	44:15 63:16	27:21	intention	82:21 83:4 99:14
76:18 77:2 137:19	116:15,23 133:25	individual	112:11	146:20 147:2
137:21 158:9	impact	8:6,20 10:2	interchangeably	intervention
hold	150:6	individually	11:13,24	69:9 147:14
13:2,8,12 63:24	implied	153:14	interested	interview
66:24 131:14	137:17	individuals	51:25 125:20	37:21,24 38:2,25
home	importance	114:17 119:10	166:19	introduced
51:2,3,8,9	126:14	121:19 131:14	interfaced	17:10 19:24 21:13
horrible	important	133:12	21:11	81:10
92:3 157:12	42:21 159:8	indonesian	interfor	invalidated
hospital	impose	77:17,22	1:16,19 4:15 6:12	158:3
9:13,23,24	104:2	information	22:21,25 23:4,11	investigate
hour	improper	24:8 29:11,15	23:13,20 24:2,5	30:2,7 31:5 42:12
37:24 111:19	115:4	31:20,23,25 32:23	24:10,24 25:15	101:16 104:17
hours	improve	35:24 36:2,5	26:2,16,22 27:7	investigated
40:15 50:23 79:25	46:7,10	37:23 47:3 50:15	27:23 29:21 30:7	83:2
80:3 129:24 130:3	include	53:6 72:4 89:24	31:3,5 33:22 44:5	investigation
house	122:13 125:25	90:2,8,8,9 117:23	44:9 45:6,18,19	23:13 24:8,11,11
79:21 80:21	included	117:25 118:16	47:10,10,11 49:12	29:22 31:11,12
human	129:23	120:16 121:16	49:22 51:11 55:5	32:22 42:6,9
11:19 159:8	includes	122:9,14,18,25	55:20 57:2,12,15	71:23 72:17 75:20
humanities	68:25	125:4 126:6	57:19 60:10,16,19	75:24 80:9 91:18
14:9	including	139:12 161:20,22	60:22,25 61:3,5	101:2,7,10,24
hyland	79:24 99:11	162:3 165:12	61:22 62:15,25	102:21,25 103:16
4:3 92:25	122:19	informed	63:10 66:5,6 68:7	investigations
I	incorporate	16:4	68:10 69:3,17	30:23 75:7 102:2
	161:11	initials	71:25 72:2 75:2	102:8
Ī	Ī		Ī	Ī

				1 490 10
investigator	1:3 2:2 3:8 4:6,10	juval	152:7,19	known
24:9 89:5,8	4:13,20	1:17,19 4:15 6:13	keiths	146:6
102:13 104:17	jeske	23:8,10 28:12	38:17	knows
invited	119:8	33:15 34:19 45:25	kept	144:15
18:22 132:7 157:3	job	47:19,19 49:14	72:24 121:21	kofman
invoice	2:7 26:6 69:20	50:3 54:12 72:6	key	4:6 43:25 92:22
63:2,12,23,25	75:10 99:17	79:16,17 83:8	126:18,20	92:24 94:15,22
64:2,3,15 65:24	joe	89:24 90:17 91:16	kim	95:10 96:4 97:23
66:4,11,12 163:17	19:24 23:7 30:14		131:11,17	102:17 103:12,24
163:19,21,23	31:2 33:12 35:10	K	kind	104:4 106:11,24
164:3,5,7,9	50:9,16 71:5,13	kaplan	136:21 159:8	108:9,16 109:14
invoices	72:23 79:8	4:15 6:12 55:16	knew	110:3 111:8,17
61:25 62:24 63:13	john	57:14,18 59:15	29:9 41:6 83:19	112:3 113:13
64:10,22 65:14	1:17 76:18	61:20 62:18 67:7	88:6,9,18,22,23	115:6,12,16,19,23
73:5,7	johnson	karen	90:12 92:14	116:21 123:6
involve	127:14 138:6,16	14:18 118:3 121:7	know	124:4,14 128:20
100:13	139:17,21 140:10	121:9 122:17	7:2 8:2 15:13	129:7,10 158:12
involved	johnsons	124:21,22,23	22:11,13 25:24	161:4 162:5 163:5
11:20 12:4 23:23	138:8	kathy	31:4,9 34:15	kris
61:10,12,13 74:16	jomanna	131:11	37:19,21 39:16	30:2
99:18,19,20,23	2:7 3:9 166:7,24	keeffe	44:17 45:16,16,23	kristin
100:14,17,20	joseph	1:16,23 30:13,15	50:23 54:3,17,21	1:16,23 28:24
118:19 121:20	19:11,12 25:4,17	30:16,21 31:24	56:17,19 65:17	30:13,15,16 31:24
126:20,24 134:6	judge	32:6,19 33:5 34:2	76:15,20 77:8	35:10,11 36:21
137:10 142:19	96:24 101:21	35:3 36:21 39:13	78:14,14,14,17,17	38:21 39:13 42:12
158:19	102:18	40:10,12,24 44:15	78:21 79:4,11	44:15 49:7,19
involvement	julian	49:7 50:12,14	81:14 83:4 85:14	50:9 70:16,20
138:9	137:14	70:16,20,21 71:2	85:16 86:6 87:15	71:10,15 72:4,23
involving	july	73:13 74:25 75:18	87:18,24 88:2,11	73:13 74:25 76:6
102:19,24	78:9 116:3 123:8	75:22 76:7 77:12	88:14,20 89:25	77:8,12,16 80:21
irrelevant	junco	77:16,19 78:7	90:3 91:9 93:6	82:5 83:18 84:22
94:17	128:7 154:24,24	79:5 82:5 84:22	94:8,22,24 101:3	86:11 89:23 90:17
issue	155:8	86:12 88:6 89:24	101:11,13 102:21	92:11,14 93:25
20:17 106:2	june	90:7,17 93:25	102:22 106:20	104:21 121:4,6
issues	2:3 3:2 162:15	109:4,6,9,12,15	116:6,7,13 117:5	kroll
82:22 109:13,17	166:22	109:17 110:9,14	117:24 118:6	128:5 134:8,9,21
110:9,15,21	just	110:18 111:4,17	120:18 121:14,18	135:3,9 136:10
116:12	6:15 7:4,8,10 25:7	121:4,6	121:20 122:10	137:14 153:9
iterations	35:11,14 38:17	keep	126:19 129:9	154:15 159:18
11:11	46:5 48:6 52:23	16:4 121:10,15	130:13 133:19	160:6
itll	54:8 61:25 65:25	122:3,5 125:6,14	139:11 144:21	
106:17	74:20 81:18,24	140:2,20,21,22	146:11,13 157:21	L
	93:6 95:9,13 96:3	keeps	158:17 159:2,17	lack
<u>J</u>	100:11,20 105:20	121:24	161:19 162:2	75:15
jane	116:21 124:5	keith	knowledge	lama
1:17	125:15,18 135:19	1:16,23 4:12 10:6	44:11,12 51:13	107:18
january	136:19,20,23	16:22 23:23 33:8	52:7 68:11 70:13	landy
21:2,4 63:23,24	142:3 161:12,17	36:23 38:22 68:20	80:19 87:21 102:8	4:17 6:9,11 7:18
63:25 64:7 67:24	justin	69:3 79:17 95:18	104:8,13 117:20	11:25 13:10,16
jersey	23:3	97:4 132:6 152:3	133:21	18:7 24:23 26:20
	l	l		

				1
26:25 27:15 31:15	69:10,21 119:23	69:2 94:2	10:14 29:6 34:11	84:2
34:5 40:22 43:14	120:20 128:21	line	37:24 39:23,23	major
43:23 47:6 51:16	129:16 131:6	25:17 47:21 55:23	40:9 79:22 130:15	128:9
53:2,8,13,17	143:24	56:22,23 165:5,5	135:15 138:12	making
54:25 58:11 59:19		165:9,9,13,13,17	longer	27:17 74:10 99:13
59:25 60:5 63:20	128:15,16 129:4,8	165:17 167:9,11	71:8 98:13 119:13	129:22
64:6 65:10 66:21	129:19 132:18	167:13,15,17,19	119:15,16 120:3	man
66:24 81:19 91:3	135:22 137:7	167:21	look	21:21
92:18 93:4,8 95:6	138:17 143:6,14	lines	34:16 62:6,22	manage
101:18 102:10	144:25 145:23	25:16	64:16,17 66:25	100:24
103:3,19 104:21	150:3	link	looked	managed
106:17,22 163:4	led	147:7	83:3 147:2 151:17	128:24
large	83:5	list	looking	management
36:23 126:25	left	46:4 73:14,17,20	59:5 64:6 65:25	15:5
145:9	115:22 120:3,5,22	116:9 120:21	109:10	managers
larger	121:10 125:14,20	124:10 125:14	loop	135:11 159:19,19
72:25,25	125:22,25 127:6	142:9 161:25	105:21	marathon
late	127:19	listed	lose	7:9
150:23	lefthand	28:3,6,8 83:21	144:20	mark
lateral	27:20	108:24 113:5	loss	14:17 26:20 47:8
120:13,14	legal	lists	114:4	55:3 60:2,6 115:6
lawsuit	9:3,5 12:13 30:17	161:24	losses	124:14
57:16,20,22,24	58:19,25 61:10,14	litigation	113:24 114:25	marked
59:2 113:8,25	83:19 84:20,22	27:7 37:7 58:9	lost	6:2 7:14,20,22
114:15,20 126:2	94:12,18,19 95:3	93:3,13 94:12	122:19 123:15	24:21 25:15 26:23
132:20 140:25	107:5 122:6	102:14 103:6	lot	32:13 41:17 47:12
lawyer	legitimacy	123:24 125:16,18	50:21 51:8 72:13	51:18 55:6 57:8
19:12	158:3	125:21 165:2	100:22 146:23	60:4 67:3,11,14
lawyers	legitimate	litigations	lowenstein	68:14 81:21 85:3
93:11	158:3	16:5,10	4:7 110:16 112:2	108:11 113:11,20
lead	leonard	little	112:5	115:8,24 123:4,9
51:24	4:14 128:4 136:21	117:22	lunch	124:16 158:10,14
leader	153:8,10,16	lived	66:25 67:5	165:16
10:5	letter	104:23	luncheon	marriage
leaders	7:24 25:4,5,7,23	lives	59:23 67:2	143:23,23 166:18
85:12	43:2 59:11,13,17	19:13		married
learn	59:20 62:6,12	livingston	M	9:7
22:3 30:6,11	113:14,15 129:22	4:9	machine	martin
34:22 35:8 36:20	129:25 130:2,4	llp	51:4	1:10 4:8 137:19
38:4 39:7,10	131:19,23 132:10	4:3,12 55:17	magazine	158:9
81:15 85:12 86:10	133:16 161:5	lobiondo	46:9 127:15	mary
139:2	163:10,15 164:16	128:4 136:22	137:21,23 141:4	127:24 145:7,8
learned	164:20	153:9,10,13,22	141:17 149:7	marys
30:12 31:10,14,15	liaison	local	151:17 156:7,9,11	9:24
32:10 34:19 36:10	30:17 84:23	52:5 151:15	magistrate	massachusetts
40:11 69:16 77:16	library	location	96:24	145:9
77:25 78:13 90:24	36:23	80:19	magnitude	material
139:11 151:9	liked	locked	126:13 144:21	36:11,15 38:15
156:25	70:9	122:5	main	132:23 133:12,18
leave	limited	long	14:5,13,15 83:25	139:15
	l			I

				1490 12
materials	mechanics	18:25	morrisons	17:22 20:4 24:5
158:23	156:22	met	120:7	36:11,14 90:9
matter	media	19:16 22:8 33:16	morristown	102:3 140:18
63:13 108:3	82:21	74:13,15 79:17	4:6	148:21
111:19 141:6	meet	83:5 122:10 152:5	mother	necessary
166:20	17:6 28:23 33:15	152:12,16 156:20	69:25 70:2,4	42:20 92:20
matters	69:18 70:11	156:23 157:8	147:12	need
108:24 109:5,9,18	105:12 151:24	metroland	move	6:17,21 7:8 51:23
111:23	152:7	52:4	11:12 51:17 54:6	66:15 93:6
mc	meeting	mexico	56:20 58:9 120:13	needed
7:17 11:23 12:2	17:9 19:22 28:16	128:8 155:2,21	120:14	32:2 49:12 136:12
12:15 13:14 17:18	28:18 29:6 38:15	michael	moving	154:12
18:5,9 27:13 31:6	38:19,20 39:2,8	22:6,20 94:22	63:8	needs
31:13 40:21 42:24	39:15,19,22,24	101:14 113:15	muhlenberg	51:7 53:8
43:8,16,21 44:2	40:6,13,19,21,25	128:3,5 131:5	9:13	negative
44:10 52:24 53:5	41:3 54:12,18,21	150:10 154:14	mulberry	151:21
53:11,15,22 57:17	54:22 76:18 77:11	middle	3:8 4:20	never
58:7,14 59:22	78:4,24 79:3,14	56:21	multiple	18:15 70:9 74:13
64:5,25 65:9,17	90:6 91:15,18	mike	72:17	87:15 89:15 99:14
66:19 68:11 69:11	126:16 151:14	153:16	multiplepage	99:17,17 107:4
70:13 85:15 89:9	152:4,8,9,11,16	mind	55:4 60:9,12,15	111:17 152:20
91:2 94:13,16	152:18 153:3	95:8	60:18,21,24	157:15 158:18,25
95:4,8 96:2 97:10	160:11	minus		new
97:21 103:24	meetings	66:18	N	1:3 2:2 3:8,11 4:6
106:6,12 108:2	29:7 72:5 77:15	missed	name	4:10,13,17,17,20
109:3,25 110:6,13	126:10 132:5,6,7	115:22	6:10 9:3,6 11:14	19:14 80:18,19
111:16,24 112:4	152:13	mitzen	12:13,20,21 21:22	118:7 124:6 128:3
115:3,10,13,17,21	member	19:24	24:17 33:14 81:5	135:6 148:6 152:5
116:20 120:18	36:4 70:3 74:16	model	81:6,12 92:23	152:17 155:12
123:16 128:18	87:6,9 98:21	156:25	134:5 138:3,23	166:4,6,9
129:5,9 139:4	members	monday	139:15,18,22	newark
161:6	14:22 70:7 100:2	2:3	142:3,6,17 143:3	2:2 3:8 4:20
mcguire	memory	money	145:6 149:9,21,24	96:24
3:7 4:18,21 59:21	45:23 79:10	19:6 129:23	153:8 154:14	newspaper
mcguires	mention	monthly	156:12 157:21,22	52:5 105:15,17
102:12	40:3 137:18 144:6		167:3,5	141:3 151:15
mean	156:8	months	named	155:2,3
13:14 16:25 17:20	mentioned	41:10 80:15	81:2 92:4	newspapers
18:5,11,12 27:19	32:22 35:11 53:25	136:18 138:14	names	128:8 155:5
29:13 40:14 43:14	104:20 128:14	moody	128:11 132:17	niagara
44:10 55:15 71:8	129:14 130:25	1:17,20 4:16 25:5	161:17	16:19
71:25 82:4 88:23	134:5 137:20,21	33:14,16,18 50:6	nancy	nina
89:18 90:16 91:2	138:3,6,18 141:13	91:14	1:16,23 2:2 3:6	131:10
96:18	142:6,17 149:21	morning	4:19 9:4 32:21	nodding
meaning	149:24	6:10 93:5	47:21 55:23 102:7	6:19
71:15 132:24	mentor	morris	162:11 166:11	noisy
means	17:24 18:25	1:9 4:4 92:25	167:24	152:17
27:17	mentoring	112:14,18	national	nolan
meant	13:22	morrison	17:14	23:2,17
137:15	mentors	119:3,15,18	nature	normal
	l		l	l

				1 490 1
27:4	numbers	138:9,17,22,24	occurred	66:3 67:10 69:15
norwick	52:13,14 73:14,17	139:3,14,17	38:5 54:22 71:12	71:11 80:5 85:5
110:10,11	73:22 163:9,11	141:19 142:17	72:6 98:10 114:15	85:22 95:18,21
nos	164:12,13,15,17	144:4 145:14	october	96:4 97:8 104:4
24:24 47:10 55:4	nursing	147:19 148:9,10	19:20 20:20 21:3	105:25 106:11
60:9,12,15,18,21	9:14,14,22	149:8 150:15	57:7 137:24 156:3	107:24 108:16
60:24 61:3,5	nxivm	151:22 153:23	oddly	113:10 114:2
115:25 123:10	1:5,23 8:7,11 10:7	155:7,19 156:19	54:3,4	116:25 117:21
158:14	11:4,13,18,21	157:16 158:19,22	odonnell	119:18 120:15
notary	12:4,13,22 13:3,6	159:20,25 167:3	127:24 145:7,7,8	121:9,23 124:4,13
3:10 6:5 166:8	13:13 14:10 15:10	nxivms	145:23 146:15	126:4 127:22
note	16:5,10 18:17,19	21:5 58:17,18,21	offer	130:15 132:22
68:25 124:5 146:8	18:21 20:2,10,22	62:12 75:7 80:18	77:5	130:13 132:22
146:12	21:18 23:12 24:12	80:18 86:21 89:6	offered	137:22 138:5
	24:21,23 25:2	89:13 96:15 97:12	77:9 79:11,15	141:8,12 142:16
notes	*		· /	· · · · · · · · · · · · · · · · · · ·
77:18 109:11	27:12,17 28:6,7 30:19 32:14 41:17	97:19 102:11	90:7 office	143:24 145:6 146:14 148:2,14
133:2,2,5,8,10				146:14 148:2,14 152:23 153:8,12
136:3 161:3	43:15 44:8,13,24	nxr 46:18	17:11 28:21 37:22	,
notice	45:13,22 46:14,17	40:18	84:5 122:4 160:17	154:14,23 155:16 156:12,15 157:24
3:9 59:12 108:17	47:4 49:5 51:4,11	0	officer	,
108:20 109:7	51:18 57:2,11,14	oath	5:13	161:19 162:5
110:16 112:2,5	57:17,18,23 58:24	5:14	offices	olsen
163:9 164:13,14	59:6 61:10 63:6	object	3:7 34:8 76:19	153:6
notices	63:18 64:11,21	12:15 43:10,18,22	77:12 78:4 80:18	once
109:23	67:7 68:9,14	64:25 69:11 91:7	84:10 90:7	82:18
notwithstanding	69:10,21 73:4	97:10,21 106:19	offtherecord	oneonone
68:21	75:13,14 76:12	106:23,25 108:3	136:20	135:19
novello	80:17 81:11,21	112:9 115:3,4	oh	onepage
128:2 147:15	82:4,8 83:11,21	139:4	11:6 12:18 46:25	26:21
148:19 149:8	85:11,20 86:4,16		115:21 147:11	ones
november	87:7,24 88:20	objected 90:24	148:23	127:7 128:9
17:7 33:25 45:15	89:16 91:6,21		ohara	oochi
48:3,15,24 49:18	93:12,21 94:12	objection 43:9 95:7 101:18	19:11,12,17,24,25	131:10,16 132:17
49:21 135:24	95:21,25 97:9,16		20:10,11,18 21:4	opens
ns	97:24 101:9,23	106:16	23:7 25:4,17	106:7
56:14	102:13 103:4,20	objections	30:14 31:2 33:12	operate
number	104:16 106:3	5:8 94:20 106:18	41:21,25 42:5,10	15:3
10:9 27:22 38:22	107:13,25 108:18	112:6	42:19 43:11,14,17	operation
40:14 48:12 52:13	108:23 112:22	obligation	50:9,17 71:5,13	37:8 69:2,8,17,23
55:20 60:2 64:5	114:6,21 116:18	58:18 124:5	72:3,23 79:8	69:24,24
65:12 66:14 67:6	117:3,10,17,22	observing	102:6,19	operations
83:22,25 84:2	119:11,19,23	43:12	oharas	15:8
85:24 99:16	120:8 121:10	obtained	25:20	operative
109:12 110:17	122:14,18 123:9	73:14,16 78:8	okay	93:5
115:20 122:11	125:14 127:6	obtaining	12:2 15:19 26:15	opinion
126:10 128:23	129:2,6,10 131:6	9:22	39:7 40:18 42:2,8	89:17 98:12
138:14 149:4	131:24 132:23	occasionally	45:2 47:6,17,24	101:21 102:18
156:23	133:11,23 134:14	18:23	48:12,17,21 52:3	103:9,10
numbering	134:15,22,23	occasions	53:24 55:25 59:19	opportunity
53:3	135:19,22 137:3	122:11 156:21,23	59:25 61:19 65:23	62:14 109:7
33.3	100.11, ,== 10,.0			

				1496 1.
annagad	52.12 14 20 21 24	nautiainata	121:10 122:14	127:23 142:16
opposed 70:8	52:13,14,20,21,24 55:19 62:7,9,24	participate 99:25	124:22 125:9,10	144:13,15
	63:9 64:17 66:2		· · · · · · · · · · · · · · · · · · ·	· ·
order 143:23	85:9,19 113:14	participated 99:5,8,9 111:6	125:14,20,22,25 126:18,20 127:5	ph 1:10
	163:3,8 164:2	′ ′	120.18,20 127.3	
organization 70:7 120:13	, , , , , , , , , , , , , , , , , , ,	particular 50:11 84:12 158:6	131:2 132:22	pharmacy
126:23,25 127:23	165:5,5,9,9,13,13 165:17,17 167:9		131:2 132:22	142:25 143:2,4
128:22 130:16	167:11,13,15,17	parties 5:5 166:17	135.7 140:6	phil 81:2,4,13,16 92:4
131:14,18 145:18	167:19,21		145:18 157:9,10	96:8
146:3,22 151:7	· ·	partner 154:15	160:2,3,17,20	phone
153:11 159:3	pages 85:3 113:17		161:18,24	22:5 52:19 73:21
organizations		partners 153:16	peoples	83:22,25 84:2,3,4
126:25	paid		132:16	
	82:10,11 94:9,11	party		84:8,11,18 135:21
original	94:23 95:24 107:4	,	peretti 92:25	136:19 140:5
11:6 113:2	107:11,12,22,24	pataki		142:14 143:10
originally	pain	149:16	perform	153:25
42:16 71:24,25	10:3	patients	23:13 44:24 46:2	photographs
72:2 150:21	papers	10:3	69:9	36:16,17,23
outcome	76:2 113:2,9	paul	period	phrase
166:19	paragraph	1:10 4:8	10:18 11:3 20:9	56:23 57:6
outlet	46:19,21,23 47:4	pay	49:23 59:3 75:2	physicist
17:14	51:25 52:18,21	28:6 57:21,23	86:23 93:17,19,22	156:17
outline	56:8,13 62:8,8	58:18,24 64:21	periods	physics
113:24	68:23 85:10,20	73:4,6 107:6	83:16	156:22
outlined	88:15 89:3	payable	permission	pictures
8:13	paragraphs	65:6	138:23 139:18	38:16,22
outside	85:23 110:15	paycheck	149:9	pigeon
135:18	pardon	15:15	perretti	81:10
overall	28:7 43:16 115:22	paying	4:3	pillar
26:10 71:23	park	94:18 95:3	person	144:13
oversaw	4:13	payment	33:13 37:22 79:18	place
13:25 21:14 118:2	parlato	28:2 61:10,13,17	80:25 84:12 118:2	· ·
121:21	81:6,7,8,12 82:7	61:19 62:17 63:3	122:12 129:11,13	40:20 41:3,5,6,7
oversee	82:13 86:2,5,8,13	63:6,11,14,18	138:5 141:12	41:10 83:17 96:23
13:20 15:7 118:4	86:15,20,22 87:4	64:10 106:3,10	143:10 146:8	135:5 136:11
oversees	87:13 89:19 92:12	163:12	personal	143:9 148:16
122:17	93:10,13,20 94:9	payments	8:23 36:11 102:8	plain 1111 0
overview	95:22 96:8,10	26:6,16 27:8,22	108:3 141:6	111:8
9:21	97:6,8,12,20,25	27:25 67:6,10	personally	plaintiffs
owing	98:8,10 107:6	pc	18:25 19:16 44:4	1:7
65:11	part	4:7	76:22 145:21	plan
owner	16:3 69:17 74:12	pending	148:8 159:24	52:22
12:5,7,10 134:8	74:14 75:23 108:4	7:11 16:18 107:9	persontoperson	planned
P	123:16,17,21	people	143:11	157:8
	141:2 147:10	14:20 37:18 73:20	perspective	plaza
p000004811	participant	73:22 74:11,11	53:7 114:10	4:5
158:14 164:25	19:23 86:23	83:17 84:13 91:5	pertaining	please
page	145:15	94:21 114:5 116:9	53:25	9:8 55:8 89:10
25:14,15 46:17	participants	116:17 117:2,9	peter	93:6 104:5 112:21
47:20 48:6 52:12	86:25 132:25	118:18 120:20,21	4:10 110:11	115:6 125:8 129:6
	I	I	I	I

				1
140:2	141:8	procedure	promotional	32:15 44:13 53:24
point	president	84:17 108:19,22	139:15 158:22	55:10 62:2 63:10
40:19 51:22 73:8	12:6 13:6,15,17	proceeding	prompted	64:9 65:2,7,13,16
77:7 89:23,23	13:19 14:21 26:5	86:16	138:2	69:6,12,14 73:21
101:19 103:18	61:9	proceeds	proposed	74:8 75:8 77:19
points	press	6:16	69:3,8 88:23	78:10,20 85:21
72:7 96:15	83:11,12,14 84:15	process	provide	94:14 95:14 96:3
portion	84:19 96:21	37:16	76:25 114:18	97:11,22 103:17
16:7 25:7 51:22	105:23 130:7,12	proctor	117:17 159:20	103:25 104:5
54:14 65:3 71:18	132:3	131:17	provided	106:15,20 107:8
78:11 89:11 104:6	pressure	proctors	66:8 161:14	108:5,6 128:19
119:6 144:11	146:23	126:22,23	provisions	139:5
pose	pretty	produce	50:11	questioning
70:16	44:16 83:2 92:11	124:6	public	104:20
posed	previous	produced	3:11 6:6 45:8,9,12	questions
69:22	25:13 64:22 66:17	27:7 59:20,21,23	45:13 46:7,11	6:25 8:12,17
posing	66:21 90:14	116:3 117:8 123:7	81:9 82:22,25	18:24 41:16 48:18
71:2	previously	123:23 124:8	83:6,17 99:11	53:14,19 63:21
position	24:21 32:13 44:3	158:13	100:22 166:8	85:8 92:21 101:21
13:2,7,9 89:7,13	51:18 57:8 68:14	producing	publication	106:8 107:9 112:6
positive	75:9 81:21 115:11	118:3,5	87:3	165:16
42:17 46:11	115:14	product	publicity	quinn
160:13	principles	103:13 104:3	149:18,19	113:16
possess	1:6 108:21 112:12	production	published	quite
79:5	112:17,22	124:2 165:8	52:8 87:19,20,22	31:21 111:6
possession	prior	professional	87:25,25 88:7,7	quote
36:10 133:13	11:3,4 29:8 65:8	9:14 13:22 18:2,3	publisher	159:13
possibility	65:14 67:5 151:25	18:6 114:18	128:7	quoted
71:2	private	professionally	purpose	159:6
possible	24:9,11 89:5,7	19:2	31:22 32:3 71:18	
42:13	104:16 138:20	profit	109:22	R
postgraduate	privilege	15:23	purposes	raised
9:17	102:11,23 103:7	program	7:4 71:22	110:10
potential	103:14,14,20	9:13 19:23 86:23	pursuant	ran
11:19 122:20	104:3 108:4	86:25 105:4	3:9 108:18,21	136:21,24
158:20	privileged	114:14 132:25	put	raniere
prejudice	101:20 102:15	160:11	28:11 34:6 47:6	1:16,23 4:12 10:6
56:24	103:11,11	programs	51:16 53:6 65:23	16:22 17:16 18:3
preparation	probably	1:5 10:7 12:17,19	146:22	18:16 23:23 33:9
119:2 126:21	33:8,12 40:3	project	putting	36:12 38:7 39:19
prepared	80:15 83:18	99:22 100:12,16	77:8	39:21 40:11 43:4
8:16 161:23	135:23 140:16	122:17 157:5		79:18 95:19 97:4
preparing	156:3,21 159:7	projects	Q	107:15 132:6,11
77:4	160:23 161:2	99:13,17	quantum	139:9 152:3,8
present	problem	prolongs	156:22	159:4
18:16,20 57:16	49:13 95:2 142:5	112:8	question	ranieres
77:13	143:22 149:19	promoting	5:9 6:17 7:3,5,10	68:20 159:9
presentation	problems	158:19	7:11 12:16 13:11	rarely
135:13	10:3 82:20 83:2	promotion	17:19 18:10,12	83:12
presently	149:24	120:12	20:16 22:15 25:8	reaction
	I			

				1490 10
151:18	70:15,18 78:7	recording	100:11 127:12,13	reported
read	92:13 107:15	39:5,12,17	136:9,12 137:13	2:6 30:13 41:11
16:8 37:24 51:23	110:5 143:3 159:5	records	140:3 141:18	41:12 116:10
52:17 53:6,8 54:4	recalls	133:23	142:12 145:13	reporter
54:15 57:3 65:4	53:20	refer	150:6,14 151:4	3:10 52:20 55:2
73:19 77:18 78:12	receipt	62:5 74:20 80:17	153:13 154:13	60:6 151:24 159:2
78:19 81:17 83:3	129:25 130:3	reference	155:6 156:18	166:8
85:6,19 89:9,12	receive	43:17 57:6	remember	reports
96:5 104:4,7	15:19,21 31:19,23	referred	11:6 23:24 24:19	35:9,10,12,13,14
119:7 141:3	58:16	37:7	25:13 29:5,7,9	35:15,18
142:10 144:7,12	received	referring	30:8 32:9,24 33:4	represent
151:19	22:5 72:10 131:20	O	33:19,23 34:11	6:12 57:15,19
reading	132:25	52:14 58:12 81:25	36:3 39:9,11,15	67:23 92:25
53:20 54:2 77:5	receives	refers	39:16 41:5 45:16	representation
78:25	84:18	85:14	46:12 47:5 54:4	27:2,11,18 61:21
real	receiving	reflect	54:23 56:19 58:23	66:9
81:5,5 100:14	129:24	43:9	63:16 71:4,12,13	representative
realization	recess	reflected	71:14 73:6,7	8:11,21 74:6,9
160:13	41:14 67:2 89:21	33:3	75:21 76:4,23	represented
realize	105:19 130:23	reflects	77:4,5,21,22,24	61:23 92:6,7
20:16 85:3	144:10	27:8	78:5,13,21,23,24	96:15
really	recognize	reforma	78:25 79:14 80:7	representing
34:11 71:19	25:18 47:14 51:20	155:4	80:24 86:18,19	102:13
144:17	52:2 55:10 67:17	refresh	88:2,8,13,14	represents
reason	81:22 108:13	62:16	91:15,15,19 92:16	65:11 114:3 116:8
28:5,9 63:5,17	113:19 116:5	refuse	93:15,18 94:3,4	reputation
64:11,13 65:20	123:11 124:18	73:4 117:17	96:22 97:2,3 98:5	144:16
118:11 120:25	159:13	refused	101:3,4,13 104:9	request
125:15 129:18	recollection	114:18	104:9,14 140:10	54:11 72:3 133:15
137:7 143:6	8:23 41:11 45:19	refusing	150:25 157:22	161:5 165:8
145:23 167:6,9,11	46:6 62:3,16	73:6	159:10,14 160:8	requested
167:13,15,17,19	76:24 109:11	register	160:10,21,22	16:7 54:14 65:3
167:21	record	163:12	remembering	77:6,7 78:11
reasons	7:19 16:8 24:23	relate	101:8	89:11 104:6 119:6
98:16 125:22	32:21 42:24 43:8	48:19	repeat	144:11
126:2 144:24	54:15,24 55:14	related	16:6 111:3	required
reath	65:4 78:12 81:19	37:22 127:8	repeating	58:2
4:12	89:12 95:11	166:17	105:3	research
rebuttal	103:23 104:7	relates	rephrase	147:4
76:25	108:16 112:7	65:13 73:21	13:10 20:15 22:15	researched
recall	113:13 115:23	154:10	42:3 86:14	146:21 147:6
16:17 26:15,18	119:7 123:6	relating	report	reserved
28:2 30:4 32:25	144:12 166:14	8:12 109:16 126:2	14:20,22 31:24	5:9
34:12 35:2,4	167:7	relations	32:4,7,10,11,16	reserving
36:25 38:9,11	recorded	45:8,10,12 81:9	32:17,19 33:3,6	92:18
41:9,23 45:2,21	6:18 39:2,3,8,15	82:22,25 83:17	33:17,20,24 35:3	resignation
47:2,24 49:3 54:2	39:19 40:2,4	99:11	41:13,18,20 44:5	146:5
54:10,17 55:25	152:14	relationship	44:9 73:20 77:2	resigned
56:10 57:13 59:14	recorder	20:2,5 29:2,8 46:8	104:10,15 120:24	120:22 146:3
62:4 63:4 67:8	152:15	97:19,25 98:8	121:18	respect
	I	I	I	I

				3
6:25 27:25 37:18	62:12	121:5 126:5,9	salzman	112:9,11 113:1,11
45:10,12 63:22	reveal	room	1:16,23 2:2 3:6	113:14,19,20,22
64:14 65:7 69:4	131:24	122:5	4:19 6:1,2,10 7:1	114:1 115:1,7,8
101:23	review	roseland	7:15,20,22,23 8:1	115:24,24 116:1
respective	46:20 48:25 52:23		8:13 9:1,4 10:1	116:16,16,25,25
5:4	53:18 55:9	ross	11:1 12:1 13:1	117:1,15,15,21,25
respond	rich	1:9,9,10,13 4:8,8	14:1 15:1 16:1	118:1,5,14 119:1
84:15	23:3 72:3	21:22,25 22:4,8,8	17:1 18:1 19:1	119:2 120:1,17
responded	rick	22:10,18 29:2,4,9	20:1 21:1 22:1	121:1 122:1 123:1
43:5 83:12	1:9,13 4:8 21:22	29:10,13,18,19,22	23:1 24:1,20 25:1	123:2,4,7,11
responding	21:25 28:25 29:8	30:7 31:5,10 33:2	25:2 26:1,21,23	124:1,14,16 125:1
83:11	29:10 31:5 34:19	34:19 35:6,20,22	26:25 27:1,20,21	126:1 127:1 128:1
responses	37:15 42:6,9 46:3	36:10,22 37:3,16	28:1,7 29:1 30:1	129:1 130:1,24
83:16 160:8	46:5 54:12 74:22	37:17 38:2,21	31:1,8 32:1 33:1	131:1 132:1 133:1
responsibilities	77:25 82:14	39:2 40:25 41:3	34:1 35:1 36:1	134:1 135:1 136:1
13:18 15:5 16:3	143:19,20,21	42:6,9 43:11 46:3	37:1 38:1 39:1	137:1 138:1 139:1
30:22	144:7,8 157:11,20	46:5 52:19,22	40:1 41:1,15 42:1	140:1 141:1 142:1
responsibility	157:25 158:5	54:12,18,21 69:4	43:1 44:1 45:1	143:1 144:1 145:1
49:13 61:16 75:14	ricky	69:9,18,19,22	46:1 47:1,8,12,14	146:1 147:1 148:1
responsible	1:10	70:11 71:23,24	47:15,22 48:1	149:1 150:1 151:1
8:12 75:5 83:10	rigged	73:15,18 74:22	49:1 50:1 51:1	152:1 153:1 154:1
118:19 129:3,8	66:10	75:20,23 76:9,13	52:1 53:1 54:1,9	155:1 156:1 157:1
restaurant	right	77:17,25 78:8	54:25 55:1,3,6,8	158:1,10,12,15
152:16,17	7:12 20:15 23:6	79:6 80:5,10	55:23 56:1 57:1,8	159:1 160:1 161:1
result	43:13 44:2 45:2	82:14 91:17	58:1 59:1,5 60:1,3	162:1,11 163:4,9
42:14 72:5 112:13	48:25 54:6 58:14	101:23 106:9	60:6,8,11,14,17	163:10,12,13,15
112:17,23 113:24	62:22 63:20 64:14	111:10 137:18	60:20,23 61:1,2,4	163:17,19,21,23
112.17,23 113.24	65:20 68:13 92:18	143:19,20,21	61:6 62:1,5,23	164:3,5,7,9,11,13
results	92:19 106:20	144:7,8,8 147:3,7	63:1,22,22 64:1	164:14,16,18,20
160:14	112:10 124:3	157:11,20,25	64:14 65:1,24	164:23,24 166:11
retain	148:7 149:13	157.11,20,25	66:1,5,8 67:1,3,5	167:5,24
59:16	righthand	rule	67:12,14 68:1	salzmans
retained	52:15	108:19,22	69:1 70:1 71:1	102:7
44:23 45:7,9,14	riker	rules	72:1 73:1 74:1	sandler
49:22 51:12 80:14	4:3 92:24	6:16	75:1 76:1 77:1	4:7
		ruling	78:1 79:1 80:1	
retainer	rings 84:4	165:16	81:1 82:1 83:1	sara 107:23,24
25:23 26:2 27:24	robert			ĺ ,
55:13 61:20 62:6 62:18 64:23		run 15:8 128:25	84:1 85:1 86:1 87:1 88:1 89:1	saw 25:11,12,13 48:22
	4:14,17 6:11	13:8 128:25	90:1,5 91:1 92:1	50:19 52:7 67:19
retainers	robertson		90:1,3 91:1 92:1	68:21 89:4 91:20
62:2	81:2,4,13,16	runs 52.2 155.2 2		
retreat	85:12,20,25 88:17	53:2 155:2,3	95:1,12 96:1 97:1	saying 29:18 35:22 37:4
1:11 4:9	92:4 96:8	S	98:1 99:1 100:1 101:1 102:1 103:1	43:5 73:8 76:25
retrospect	rochelle	salary		
160:10	1:9 4:4 93:2	15:17	104:1 105:1,20	77:21,24 159:7
return	112:14,18	sales	106:1 107:1 108:1	says
125:8 133:12	role	40.04	108:11,13,14,14	62:9 68:24 85:20
returned	13:19 14:21 18:17	salinas	108:17,20,23,25	scheduled
133:18,24 134:2	18:19,24 21:5	14:18	109:1 110:1,24,25	157:18
returning	26:5 111:11 120:8	17.10	111:1,3,23 112:1	scherer
L	ı	1	1	ı

4:3 92:24	50:25 51:7 77:9	short	six	sp2230
school	122:7 161:5	53:14,16	118:24	123:10 164:22
9:10,13	senior	shorten	skolnick	sp2302
scientist	126:23	63:20	106:16	115:25 164:19
156:16	sense	shorthand	skolnik	sp2309
scientists	8:25	3:10 166:8	4:10 42:25 43:5,7	116:2 164:19
157:4	sent	shortly	43:20,24 95:2,5	speak
scientologist	42:25 51:2 122:12	32:10 41:12,13	102:5 107:2	6:22 44:4,8 50:3,6
74:20,22	124:23 125:2	82:6 147:22	110:10,12	76:8,12 82:17
scientologists	145:17	show	skolniks	83:7 87:2 91:13
74:11	separate	24:20 32:12 42:24	109:6 110:16	93:20 95:9,18
scientology	109:23	51:17 55:2 68:13	slightly	138:16 143:5
73:25 74:7,14,17	september	84:25 112:7 161:9	89:2	speaking
scope	26:2 87:11	showed	small	144:8
31:12 42:14 72:16	series	8:3 88:10	85:4	specialized
sealing	22:11 62:24 72:6	siblings	smaller	143:2
5:5	84:13 85:8 98:9	147:13	155:4	specific
second	99:12 128:8 132:5	side	snyder	45:11 51:22
7:18 62:7,7,9,24	145:2 150:11,12	27:20 58:12	28:24 30:2 72:4	specifically
63:9 66:24 69:8	served	sign	104:21,22	68:25 85:2 125:19
95:9 124:10	109:15 112:25	49:12,17,20 51:11	snyders	126:24
secret	113:9	56:4 131:19	42:12	specify
132:23	service	signature	sole	146:25
section	62:14	25:16,17,18,20	12:7,10	speedwell
52:23 53:20,25	services	47:21,22,23 55:22	somebody	4:5
54:2 56:21	20:22 72:8,9	56:7	46:8 77:6 92:3,4	spinoffs
see	114:19 117:17	signatures	111:15 138:23	150:13
25:16 27:4,21	sessions	55:21	146:2 153:2	split
32:4 33:24 52:6	135:19 155:22	signed	156:23	20:8
55:20 58:11 64:18	set	5:13,15 49:2	somewhat	spoke
68:19 72:22 82:3	56:18 124:11	50:19,22 51:15	47:9	28:17 39:21 40:24
85:23 102:23	153:4 166:12,22	54:12 156:20	soon	50:15 86:24 91:10
107:18 118:12	sets	signing	40:13,14 133:16	127:8,24,25 128:3
136:19 151:12	15:25 63:21	47:24 55:25 62:11		128:4,4,10 134:4
seen	settlement	similar	34:10 40:22 46:25	159:3
7:15 8:2 25:8,22	93:10,13 94:4	100:7	54:13 66:15 92:16	spoken
32:5 61:6 63:12	96:22	simple	107:10 118:11	28:12 33:13 73:24
68:16 121:23,24	seven	6:15	119:9 136:11	74:5 82:13 105:25
121:25 144:7	130:19	sit	154:5	130:12,25 136:14
158:18,25	sever	110:23	sort	140:12
seiler	97:24	sitrick	11:10 98:22	spokesperson
4:15 6:12 55:16	sharing	44:21,23 45:7,9	144:13 147:13	85:11
57:15,19 61:20	15:23	45:14,22 46:2,6,8	sound	spouses
62:18 67:7	sheet	46:13,15 77:2	159:11	155:10
seminar	48:9 160:20 167:2	sitting	sounds	spring
10:5,20 104:25,25	sheets	160:12	6:19	75:3 150:22,24
105:2	160:25	situation	sp2049	155:14
seminars	sheila	28:25 36:24	123:10 164:21	SS
13:23	127:13 131:11	situations	sp2208	166:5
send	138:6,8 139:17,21	38:23	164:23	st
	l	Į	I	I

				5
9:24	136:23,24 153:11	success	129:15,16 131:15	98:21 100:3
staff	153:15 154:8	1:5 10:7 12:17,19	sutton	technology
14:24 126:11,15	sting	148:12	1:9,9 4:4,4 22:6	159:9
147:22 148:2,11	37:8,8,13,14 69:2	suffered	22:16 92:25 93:2	telephone
148:14	69:8,17,22,23,24	112:12,17,23	93:11 94:23 102:9	73:14,17
stage	71:18,20,21 88:19	sufficient	106:9 112:14,18	tell
69:8	88:21,22	103:22	167:3	7:9 22:16 32:6
stamp	stipulated	suggest	suttons	73:13 75:22 94:17
115:20,25 123:10	5:3,7,11	27:22	101:2,10,17	96:12 104:21
158:14	stipulation	suggested	104:17	107:3 112:21
start	43:4 101:19 102:4		sworn	114:2 132:11
17:15 24:2 50:2	stop	31:4 45:21 157:9	5:12,15 6:5	139:6 143:13
54:19 88:25	142:11	suite	162:13 166:13	147:9 156:5
started	stopped	4:20	sylvester	157:14,19 160:17
6:14 10:5,16 30:9	114:6 116:18	summarize	113:16	telling
31:19 99:16	strange	145:3		111:13
147:22	47:10	summer	T	term
starting	street	12:24 149:5	take	11:24 75:15
7:13 9:9,21 52:18	3:8 4:20 96:23	sums	7:8,12 28:19	terminate
56:21 85:9	stricken	65:13	38:12 49:12 51:23	59:6
starts	58:9	supervising	66:23 99:2 105:6	terms
85:20	strike	126:4	111:13 117:3,10	130:4
state	23:15 35:16 36:8	supplement	125:15 135:5	terrible
3:11 19:15 77:16	54:18 63:12 69:6	116:14	136:3,11 143:9	91:25 92:5,6
128:3 148:6 166:4	74:24 93:11 97:23	supplemented	148:16 150:18	testified
166:9	98:14 117:14,23	114:21 125:25	160:3	6:6 13:25 41:19
statement	128:20 134:14	support	taken	44:3 75:9 110:19
68:23 78:18 88:16	142:20	165:2	40:20 41:3,10,14	111:4 161:12
88:25 89:3	student	supposed	89:21 105:19	testify
statements	105:11 133:2	51:14 70:12	114:14 130:23	108:24 109:18
46:3 85:7,24 86:2	139:3 145:15	sure	138:24 139:7	111:22
86:8,21 96:7,7	149:10	12:25 16:15,20,20	141:20 144:10	testifying
states	students	18:11 31:21 32:2	147:20	8:6,19 107:16
1:3 55:23 62:8,25	158:20	34:9,24 38:8	talk	testimony
63:25 64:3 85:10	subject	44:16 45:20 67:21	143:25	90:6 145:3 166:14
147:17	109:5,9 115:5	68:4 72:25 75:4	talked	thank
stating	subjects	76:20,21 92:11	69:5 127:23	62:20 92:21
78:8	110:17	95:10 99:13	talking	118:14
status	subscribed	101:12 117:5	11:3 58:13 90:4	therapy
16:4,20 41:18	162:13	118:6,7 122:12	90:12 103:13	11:7
stenographer	subsections	123:20 126:13,19	160:12	thing
6:19	111:25	127:2 140:8 142:8		99:4,10 103:15
stephanie	substance	surfaced	152:15,20	114:19 147:14
1:10 4:4 93:2	103:17 109:24	105:18	taped	151:22
101:7 112:14,19	110:2	surgeon	152:18	things
stephen	substantive	147:16	taught	10:10 21:19 29:18
127:10 134:4	109:19,21 110:20	surrounded	138:11 150:16	72:18 92:5 93:7
138:22 139:2,6	111:5,20	28:25	teach	96:13 98:9,11,14
steve	subsumed	susan	13:23	98:18,19,22 99:7
62:10 81:10	111:25	119:5 120:2	team	99:15,16,19 100:6
	l	l	l	l

100:8,17 101:14	28:24 42:20 54:4	titles	147:21 148:11,14	try
110:2 112:8	91:25 92:2,2,3,5	13:12	trainer	6:23 11:17 59:23
128:24 132:4,13	136:23 143:22	today	119:14,16,17	143:25
143:19	157:4 158:2	6:14 8:6,19 111:2	120:3 131:15,16	trying
think	159:20,22 161:6	116:22	131:17	11:6 18:7 41:8
10:15 11:5,7	threaten	told	trainers	98:5
12:18 15:15,20	131:23	22:7,18 31:24	118:18,21,25	turn
16:15,16,19 17:11	three	32:8,9,20,21 36:5	119:11 121:8	25:14 46:17 52:12
19:9,20 21:19	8:17 34:9,10	36:21,22 38:14,21	122:8 124:24	55:18 153:5
24:14 28:4 29:10	59:12 80:15 82:18	40:2,6 41:5 49:19	125:4,13 126:16	turned
29:25 30:9 33:11	153:18,19 155:9	69:19 88:9,10	126:17 130:21	146:11
34:9 35:7,9,11	threepage	92:14,17 101:14	training	turning
36:6,19 37:14	47:9	132:13 136:8,22	104:24 105:5,6,9	118:14
39:20 42:25 43:5	time	137:6,8,12 138:20	105:10,11 121:2	two
45:19 46:16 48:5	5:10 10:14,20	140:3 143:14	131:17 134:19	16:16 20:8 25:3
50:13,21,22 59:14	11:15 13:24,24	144:9,15 147:11	135:3,5,19 140:7	34:10,10 56:13
59:22 61:8 67:20	19:19 20:9,13,21	154:8,12,20	141:20 148:16	80:2,15 85:21
68:4,5 70:24 71:5	21:3,17,20,24	157:19 158:2,4	150:16,18,20	109:20 132:10
71:19,20 73:23	22:7,24 23:12,18	tomorrow	153:18 155:9,11	138:10 140:16
74:4 76:15 80:14	24:12 25:11 28:14	108:10 111:2	156:20 157:8,15	141:5 153:16
80:20 81:8 82:9	28:17 29:6,21,23	tompkins	157:18 159:18,21	twohour
82:15,18 83:9,23	30:9 34:3,11,12	3:7 4:18	159:23 160:2,3,4	152:6
84:2,4 88:10	34:18 36:7,9 42:8	top	160:15,19,20	twothirds
89:15,16 91:16	43:10,19,22 45:5	26:19 46:22 52:14	161:3	7:2
92:10 97:18 100:5	45:17,24 48:22	101:4	trainings	type
101:15 102:17,20	49:23 50:18,22	topic	19:3 136:9 138:11	9:18 85:4 113:4
103:12 105:2	51:15,23 53:16	137:9	145:17	143:2 145:11
106:16 109:8	58:6 59:4 63:21	topics	transcribed	types
110:15,20 116:23	67:19 69:16 80:14	8:13,17 44:14	6:20	10:2 112:21
118:2,24 124:12	83:5,13,15 84:7	45:11	transcript	
127:16 128:9	86:24,24 89:6	total	6:21 7:4	U
129:13 130:19,25	90:3 91:2,3,10	34:7 64:18,20	transcription	uhhuh
133:25 134:12	92:21 93:17,19,22	65:6,8 66:10,12	167:8	6:20
136:5 137:17	93:25 105:16,22	66:16,23 82:18	transpire	uhuh
138:10,25 140:16	112:10 127:18	135:17	120:19	6:20
145:16,20 146:4	131:7 134:12	totally	trash	ultimate
146:16 148:17	147:16 148:25	94:16	75:23 76:2,10,14	23:19 90:19
149:4 150:20,24	152:6 155:16	touch	treece	ultimately
156:10,12 159:16	162:6,7	87:13,17 102:2	103:9,10	42:23 122:22
161:9,24	timeline	tour	treeces	unaware
thinking	41:9	80:22	101:21 102:18	53:22
39:25 40:3	times	town	trial	understand
third	19:18 34:7 72:22	83:14,18	5:10	7:6 8:5,10,22
52:18 55:19 56:22	82:16,17 126:18	track	tried	11:14 17:18 18:10
62:23 68:23	151:15 155:20	121:10,15 125:6	99:18 100:17,20	18:12 41:19 69:14
thomas	160:5	trade	trip	71:21 73:25 74:6
4:11 113:16	title	132:23	107:16,22	74:8 75:8 102:3
thoroughly	131:13	traditionally	true	106:7 110:6
83:3	titled	160:23	72:14 104:11	128:18
thought	13:9	train	166:14	understanding
	I	I	I	l

20:23 24:4 31:11	usually	5:6	126:6,10 151:17	128:10 150:17
35:16 37:12,25	160:19	want	152:9	153:17,19
38:3,24 39:23		43:8,21 48:20	weve	works
40:19 41:2 49:16	V	66:23 70:9 73:8	7:22 69:5 83:13	30:16 120:10
51:10 71:17 86:7	vacation	94:20 96:16,17	110:25 113:7,20	124:22
87:12,23 88:5	22:6,12	106:6,8,15,18	113:24 115:24	worksheet
100:19 117:11	value	108:7 141:3 142:3	whatsoever	164:23
123:22 137:25	19:9	146:23 151:7	125:15	world
understands	various	155:18 157:5	whereof	19:10
43:12	10:2	wanted	166:21	write
understood	vendors	22:13 29:12 46:13	wife	59:13
33:21 36:8 43:18	26:6 117:16	50:22 70:22 82:24	143:18 144:7	writing
43:20,23,24 69:12	122:20	89:22 96:19 98:25	155:9	56:10 99:12,17
69:16 71:20 74:16	verbal	99:25 100:21	william	159:8
undertake	162:3	129:25 130:4,5	4:21	written
69:3 100:25 101:6	verbally	142:8 157:6	witness	35:13 46:10 76:18
101:10	161:21	waterbury	4:19 6:4 53:18	76:25 150:11
unfortunately	verifiable	9:23,24	89:22 94:24 95:9	161:6
85:4	73:3	way	103:25 106:14	wrong
unhappy	verified	7:3 72:11,12	111:14 163:3	31:7 66:14
72:15 128:23	67:15 72:12,16	98:11 121:4	165:4 166:11,15	wrote
union	164:11	128:14,24 129:21	166:21 167:5	59:11 129:22
9:11 151:15	vicente	132:14 166:19	woman	132:10 146:7,7
united	14:17		69:10,18,20 71:3	156:21 161:24
1:3 147:16	video	ways 110:8	104:23	130.21 101.24
universe	152:21	website	woolhouse	X
116:17 117:2,9,16	videotape	99:12 100:9	131:11,17	
unsigned	152:22,24 153:3	143:19,20 144:8	words	Y
25:22	view	147:3,7 157:11,20	6:18	yeah
unsolicited	96:15	157:25 158:6	work	18:9 26:11
84:19	village	wednesday	10:2,13,22 15:9	year
unterriener	87:13,17 91:20	111:2	17:22 18:8 19:5	9:25 30:4 34:15
14:19 118:3,4,15	96:5 98:17	week	30:19 33:21 41:25	68:2 105:4,18
120:15 121:7,9,15	vip	15:16 43:3 52:8	44:24 45:10 46:3	119:25 123:9
121:17 122:7,23	138:10 141:20	132:6,9 157:17	49:14 73:25 74:2	135:16 136:25
126:5,12 128:12	155:8	weekly	74:3 80:8 82:7	138:15 143:7
146:12 161:14,20	visit	35:15	98:12,21 100:4	146:17
unterrieners	34:8	weeks	101:22 103:13	years
122:21 123:15,23	visited	40:15 41:10	104:2 126:11	9:7 10:19 121:21
upholds	105:8 155:20	107:16 132:10	142:21 153:3	130:17 140:17
19:9	voice	weiner	157:5	141:5,11 149:4
upset		,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,		york
_	87:14,17 91:21	23:3	worked	JULK
139:22 140:4 4	87:14,17 91:21 96:5 98:17	23:3 weiners	worked 9:23.25 10:4.5.9	3:11 4:17,17
139:22 140:4,4	96:5 98:17	weiners	9:23,25 10:4,5,9	
use	*	weiners 72:3	9:23,25 10:4,5,9 17:25 44:5 118:15	3:11 4:17,17
use 11:13 18:25 36:4	96:5 98:17	weiners 72:3 wellspring	9:23,25 10:4,5,9 17:25 44:5 118:15 121:7 133:2 157:2	3:11 4:17,17 19:14 80:18,19
use 11:13 18:25 36:4 46:13 48:10 51:3	96:5 98:17 W	weiners 72:3 wellspring 1:11 4:9	9:23,25 10:4,5,9 17:25 44:5 118:15 121:7 133:2 157:2 working	3:11 4:17,17 19:14 80:18,19 128:3 135:6 148:6
use 11:13 18:25 36:4 46:13 48:10 51:3 70:6 72:8 138:23	96:5 98:17 W wachenfeld	weiners 72:3 wellspring 1:11 4:9 went	9:23,25 10:4,5,9 17:25 44:5 118:15 121:7 133:2 157:2 working 17:15,17,20 18:3	3:11 4:17,17 19:14 80:18,19 128:3 135:6 148:6 152:5,17 155:12
use 11:13 18:25 36:4 46:13 48:10 51:3 70:6 72:8 138:23 139:14,18 149:9	96:5 98:17 W wachenfeld 4:18	weiners 72:3 wellspring 1:11 4:9 went 9:11 28:23 33:15	9:23,25 10:4,5,9 17:25 44:5 118:15 121:7 133:2 157:2 working 17:15,17,20 18:3 18:13,13 20:13	3:11 4:17,17 19:14 80:18,19 128:3 135:6 148:6 152:5,17 155:12 166:4,6,9
use 11:13 18:25 36:4 46:13 48:10 51:3 70:6 72:8 138:23	96:5 98:17 W wachenfeld 4:18 wait	weiners 72:3 wellspring 1:11 4:9 went	9:23,25 10:4,5,9 17:25 44:5 118:15 121:7 133:2 157:2 working 17:15,17,20 18:3	3:11 4:17,17 19:14 80:18,19 128:3 135:6 148:6 152:5,17 155:12 166:4,6,9 young

128:5 134:8,9,21 135:3,9 153:9 154:15 160:6 0 000 25:25 27:24 61:20 62:13,18 63:24 65:9,10 130:6,8 00001 1:1 00108 24:24 00113 25:15	60:19 163:24 60:19 63:10 163:24 380 60:22 164:4 381 60:22 383 60:25 164:6 384 60:25 164:6 387 164:4 389 61:3 164:8	163:10 167:4 1 1 6:2 7:15 163:9 164:3 167:7 10 3:3 60:20 63:22 64:6 156:22 163:19 164:3 100 3:7 4:20 100196708 4:17 108	84:25 91:21 164:5 164:11 14th 64:3 15 24:22,24 25:2 108:11,14,17,25 111:23 164:13 158 164:24 16 108:11,14,20,25 111:23 164:14	2002 22:2,4 150:23 2003 19:20 20:20 21:4 23:7 24:12,16 121:12 134:25 135:24 137:24 149:5 150:21 155:15 156:4 2004 12:24 24:12 26:3 30:5,19 33:25 37:2 45:15 48:4
128:5 134:8,9,21 135:3,9 153:9 154:15 160:6 0 000 25:25 27:24 61:20 62:13,18 63:24 65:9,10 130:6,8 00001 1:1 00108 24:24 00113 25:15	60:19 63:10 163:24 380 60:22 164:4 381 60:22 383 60:25 164:6 384 60:25 164:6 387 164:4 389	6:2 7:15 163:9 164:3 167:7 10 3:3 60:20 63:22 64:6 156:22 163:19 164:3 100 3:7 4:20 100196708 4:17	14th 64:3 15 24:22,24 25:2 108:11,14,17,25 111:23 164:13 158 164:24 16 108:11,14,20,25 111:23 164:14	2003 19:20 20:20 21:4 23:7 24:12,16 121:12 134:25 135:24 137:24 149:5 150:21 155:15 156:4 2004 12:24 24:12 26:3 30:5,19 33:25
135:3,9 153:9 154:15 160:6 0 000 25:25 27:24 61:20 62:13,18 63:24 65:9,10 130:6,8 00001 1:1 00108 24:24 00113 25:15	163:24 380 60:22 164:4 381 60:22 383 60:25 164:6 384 60:25 164:6 387 164:4 389	6:2 7:15 163:9 164:3 167:7 10 3:3 60:20 63:22 64:6 156:22 163:19 164:3 100 3:7 4:20 100196708 4:17	64:3 15 24:22,24 25:2 108:11,14,17,25 111:23 164:13 158 164:24 16 108:11,14,20,25 111:23 164:14	19:20 20:20 21:4 23:7 24:12,16 121:12 134:25 135:24 137:24 149:5 150:21 155:15 156:4 2004 12:24 24:12 26:3 30:5,19 33:25
154:15 160:6 0 000 25:25 27:24 61:20 62:13,18 63:24 65:9,10 130:6,8 00001 1:1 00108 24:24 00113 25:15	380 60:22 164:4 381 60:22 383 60:25 164:6 384 60:25 164:6 387 164:4 389	6:2 7:15 163:9 164:3 167:7 10 3:3 60:20 63:22 64:6 156:22 163:19 164:3 100 3:7 4:20 100196708 4:17	15 24:22,24 25:2 108:11,14,17,25 111:23 164:13 158 164:24 16 108:11,14,20,25 111:23 164:14	23:7 24:12,16 121:12 134:25 135:24 137:24 149:5 150:21 155:15 156:4 2004 12:24 24:12 26:3 30:5,19 33:25
0 000 25:25 27:24 61:20 62:13,18 63:24 65:9,10 130:6,8 00001 1:1 00108 24:24 00113 25:15	60:22 164:4 381 60:22 383 60:25 164:6 384 60:25 164:6 387 164:4 389	164:3 167:7 10 3:3 60:20 63:22 64:6 156:22 163:19 164:3 100 3:7 4:20 100196708 4:17	24:22,24 25:2 108:11,14,17,25 111:23 164:13 158 164:24 16 108:11,14,20,25 111:23 164:14	121:12 134:25 135:24 137:24 149:5 150:21 155:15 156:4 2004 12:24 24:12 26:3 30:5,19 33:25
000 25:25 27:24 61:20 62:13,18 63:24 03 65:9,10 130:6,8 03 00001 03 1:1 00108 24:24 00113 25:15 03	381 60:22 383 60:25 164:6 384 60:25 164:6 387 164:4 389	10 3:3 60:20 63:22 64:6 156:22 163:19 164:3 100 3:7 4:20 100196708 4:17	108:11,14,17,25 111:23 164:13 158 164:24 16 108:11,14,20,25 111:23 164:14	135:24 137:24 149:5 150:21 155:15 156:4 2004 12:24 24:12 26:3 30:5,19 33:25
25:25 27:24 61:20 62:13,18 63:24 65:9,10 130:6,8 00001 1:1 00108 24:24 00113 25:15	60:22 383 60:25 164:6 384 60:25 164:6 387 164:4 389	3:3 60:20 63:22 64:6 156:22 163:19 164:3 100 3:7 4:20 100196708 4:17	111:23 164:13 158 164:24 16 108:11,14,20,25 111:23 164:14	149:5 150:21 155:15 156:4 2004 12:24 24:12 26:3 30:5,19 33:25
62:13,18 63:24 65:9,10 130:6,8 00001 1:1 00108 24:24 00113 25:15	383 60:25 164:6 384 60:25 164:6 387 164:4 389	64:6 156:22 163:19 164:3 100 3:7 4:20 100196708 4:17	158 164:24 16 108:11,14,20,25 111:23 164:14	155:15 156:4 2004 12:24 24:12 26:3 30:5,19 33:25
65:9,10 130:6,8 00001 1:1 00108 24:24 00113 25:15	60:25 164:6 384 60:25 164:6 387 164:4 389	163:19 164:3 100 3:7 4:20 100196708 4:17	164:24 16 108:11,14,20,25 111:23 164:14	2004 12:24 24:12 26:3 30:5,19 33:25
00001 03 1:1 00108 24:24 00113 25:15 03	384 60:25 164:6 387 164:4 389	100 3:7 4:20 100196708 4:17	16 108:11,14,20,25 111:23 164:14	12:24 24:12 26:3 30:5,19 33:25
1:1 00108 24:24 00113 25:15	60:25 164:6 387 164:4 389	3:7 4:20 100196708 4:17	108:11,14,20,25 111:23 164:14	30:5,19 33:25
00108 03 24:24 00113 25:15 03	387 164:4 389	100196708 4:17	111:23 164:14	,
24:24 00113 25:15	164:4 3 89	4:17		37:2 45:15 48:4
00113	389		160	
25:15		108		48:15,24 49:18,22
	61.3 164.8		165:10	57:7 75:2 78:9
		164:13,14	1633	146:4,16
0022.	393	10th	4:16	2005
· -	61:3 66:6 164:8	52:10	17	21:2,4 24:12
* * - * *	395	11	113:11,14,20,22	34:17 37:2 73:10
	61:5 164:10	56:5 60:23 63:23	116:16,25 117:15	75:3 91:12 113:15
001004	397	64:7,7 109:6	117:21,25 118:15	114:22
	61:5 66:6 164:10	162:7 163:15,21	119:2 120:17	2006
00207	452	163:23 164:3,5	123:2 164:16	52:10 56:5 63:15
.,,,,,,,	85:3	110 1:17	18	2007
002.0	453	1:17 111	3:3 32:14 41:17	59:9 63:24 64:15
.0.10	85:3	66:18	46:15,18 52:15	65:5,24 66:4,11
00228		113	53:4 115:7,8,24	66:12,22 67:21,24
	164:16,20	164:16	116:16 117:2,15	68:3 83:10 84:8
0_0	55.5.162.16	115	118:5 123:2	96:25
	55:5 163:16	164:18	164:18	2008
· - ·	55.5.20.162.16	11day	18th	98:6 116:3 2009
	55:5,20 163:16	105:2	166:22	
03		103.2 11th	19 52.4.122.4.7	2:3 3:2 162:15
/	163:15,17,19,21	63:23,24,25 67:24	53:4 123:4,7	166:22
000.	163:23 6cv01051dmcmf	12	163:17 164:20 1997	21 158:10 12 164:24
00110 100110	1:4	25:25 27:24 61:2	17:7	158:10,12 164:24 23
0000		65:25 67:2 109:6	17:7 1998	33:25 45:15
00.10 105.10	64:7,8 164:3,5,7,9	110:15,17 136:18	11:22 12:4,14	23146
	7068	163:23 164:7	17:21,23 147:23	2:7
00.16 106.20	4:10	123	17.21,23 147.23	23rd
	7102	164:20	2	48:3,15,24 49:18
	4:20	124	2	49:22 57:7
	79321047	164:23	1:4 7:20,22 8:14	24
	4:13	13	130:6,8 163:10	51:19 52:16 53:4
	79621981	60:3,7 61:4 64:15	164:5 167:7	53:4 129:24
	4:6	64:16 66:5 164:9	20	25
00.0	80	14	124:15,16 164:23	61:20 62:13,18
00.10 02.20	130:6,8	63:24 64:2,7 67:3	2000	63:11,15
103.22	150.0,0	- ' ',' ' ' ' '		00.11,10

26	66:13,18,19	8	
163:12 164:16	55	2:3 3:2 52:12,15	
26th	66:13 163:15	53:2,3 60:14	
113:15 114:22	56	62:23 163:15,21	
29		163:21 164:16	
	64:19 65:7,9,10		
64:19 65:7	587	167:4	
2nd	63:11,15	80	
26:2	59	66:18	
3	64:4	870	
	6	64:2	
3		89	
26:21,23 27:21	6	64:4	
28:8 163:10,12	46:17 53:3 60:3,6	9	
167:8	60:8 108:19,22		
30	109:16,21 110:3,9		
108:19,22 109:16	110:19 111:5,9	60:17 63:8 68:15	
109:21 110:3,9,19	163:9,10,17,19	163:17,23	
111:5,9	164:7,20 165:10	90	
33	167:4	160:10,16	
9:7	60	91	
366	163:17,19,21,23	66:18 163:5	
64:4	164:3,5,7,9		
	65		
4	4:9		
4	653		
47:8,12,15 54:10	27:9,11,16,23		
57:8 67:12 163:13	65304		
164:7,20	27:14,16,16		
40	67		
63:2 135:8	164:11		
452	670		
85:9	66:18		
47	6th		
163:13			
48	65:24 66:11,17		
130:3	7		
49	7		
67:2	60:11 64:15 66:4		
01.4	66:12 163:10,19		
5	164:9		
5	70 70		
4:20 52:12,15			
53:2 55:3,6 59:5	67:16		
62:6 162:7 163:4	76		
163:15 164:9	63:2		
103:13 104:9 50	794		
	63:2		
64:2	7th		
500	65:5 66:17,22		
4:13	8		
51			