

Page 1

UNITED STATES DISTRICT COURT  
DISTRICT OF NEW JERSEY

-----\*

NXIVM CORPORATION, formerly known as  
EXECUTIVE SUCCESS PROGRAMS, INC. And  
FIRST PRINCIPLES, INC.,  
No. 2:06-cv-01051  
Plaintiffs, (DMC/MF)

vs.

MORRIS SUTTON, ROCHELLE SUTTON, THE  
ROSS INSTITUTE, RICK ROSS a/k/a "RICKY"  
ROSS, STEPHANIE FRANCO, PAUL MARTIN,  
Ph.D., and WELLSRING RETREAT, INC.,

Defendants.

-----\*

RICK ROSS,

Counterclaim-Plaintiff,

vs.

KEITH RANIERE, NANCY SALZMAN,  
KRISTIN KEEFFE INTERFOR, INC.,  
JUVAL AVIV, ANNA MOODY, JANE DOE  
and JOHN DOES 1-10,  
Counterclaim-Defendants.

-----\*

(Caption continued on following page)

CONFIDENTIAL

VIDEOTAPED DEPOSITION OF: KEITH A. RANIERE  
(Volume I)  
DATE TAKEN: WEDNESDAY, MARCH 11, 2009

COMPUTER-AIDED TRANSCRIPT PREPARED BY:  
FITZSIMMONS REPORTING & VIDEOCONFERENCE CENTER  
570 West Mount Pleasant Avenue  
Livingston, New Jersey 07039  
PHONE: (973) 994-3510  
FAX: (973) 994-3621

Page 2

1 (Continued)  
2 INTERFOR, INC., JUVAL AVIV, and  
3 ANNA MOODY,  
4 Cross-Claimants,  
5 vs.  
6 NXIVM CORPORATION, KEITH RANIERE,  
7 NANCY SALZMAN and KRISTIN KEEFFE,  
8 Cross-Claim Defendants.  
9 -----\*

T R A N S C R I P T of the stenographic  
10 notes of the proceedings in the above-entitled  
11 matter, as taken by and before CHERYL McGANN, a  
12 Certified Court Reporter and Certified Realtime  
13 Reporter of the State of New Jersey, held  
14 at the offices of DRINKER BIDDLE & REATH LLP,  
15 500 Campus Drive, Florham Park, New Jersey, on  
16 Wednesday, March 11, 2009, commencing at  
17 10:24 a.m.

A P P E A R A N C E S :

20 TOMPKINS MCGUIRE WACHENFELD & BARRY LLP  
21 BY: WILLIAM B. MCGUIRE, ESQ.  
22 -and-  
23 RICHARD B. ULSAMER, ESQ.  
24 4 Gateway Center  
100 Mulberry Street  
Newark, New Jersey 07102  
Attorneys for Plaintiffs and Cross-Claim  
25 Defendants, NXIVM Corp., Nancy Salzman  
and Kristin Keeffe

Page 3

1  
2 A P P E A R A N C E S (Continued) :  
3  
4 DRINKER BIDDLE & REATH LLP  
BY: ROBERT M. LEONARD, ESQ.  
5 -and-  
THOMAS F. CAMPION, ESQ.  
6 500 Campus Drive  
Florham Park, New Jersey 07932-1047  
(973) 549-7370  
7 Attorneys for Keith Raniere  
8 RIKER DANZIG SCHERER HYLAND PERRETTI LLP  
BY: HAROLD L. KOFMAN, ESQ.  
9 -and-  
10 ANTHONY J. SYLVESTER, ESQ.  
Headquarters Plaza  
One Speedwell Avenue  
11 Morristown, New Jersey 07962-1981  
(973) 538-0800  
12 Attorneys for Morris Sutton,  
Rochelle Sutton and Stephanie Franco  
13  
14 LOWENSTEIN SANDLER PC  
BY: PETER L. SKOLNIK, ESQ.  
15 -and-  
THOMAS S. DOLAN, ESQ.  
16 65 Livingston Avenue  
Roseland, New Jersey 07068  
(973) 597-2508  
17 Attorneys for The Ross Institute, Rick Ross,  
Paul Martin and Wellspring Retreat, Inc.  
18  
19 FRIEDMAN KAPLAN SEILER & ADELMAN LLP  
BY: ROBERT S. LANDY, ESQ.  
20 1633 Broadway  
New York, New York 10019-6708  
(212) 833-1100  
21 Attorneys for Interfor, Inc., Juval Aviv  
22  
23 ALSO PRESENT:  
24 Nancy Salzman  
Rick Ross  
Karl Petry, Videographer  
25

Page 4

I N D E X

1 WITNESS DIRECT CROSS REDIRECT  
2 KEITH ALAN RANIERE  
3 By Mr. Kofman: 8

E X H I B I T S

Exhibit	Description	For Identification
4		
5		
6	Raniere-1 Document headed Biography on Keith Raniere, Founder & Developer of Rational Inquiry, Highly Confidential Bates stamped P000004995-4996	6
7		
8	Raniere-2 Affidavit of Keith Raniere signed 8/18/03 consisting of six pages	66
9		
10		
11	Raniere-3 United States Patent and Trademark Office Documents Bates stamped P00000209 through 231	93
12		
13	Raniere-4 Document entitled Assignment Bates stamped P000000689	97
14	Raniere-5 Three-page document entitled A Forensic Psychiatrist Evaluates ESP	107
15		
16	Raniere-6 Robert Jay Lifton's eight criteria of thought reform as applied to the Executive Success Programs Bates stamped P000003648 through 3661	126
17		
18	Raniere-7 Executive Success Programs, Inc. Student Enrollment Application of Stephanie Franco Bates stamped P000004105	141
19		
20		
21	Raniere-8 A Critical Analysis of the Executive Success Programs Inc., Bates stamped P000003674 through 3682	146
22		
23	Raniere-9 Document headed Persistence Bates stamped SF00104 through 108	149
24	Raniere-10 Document headed Rules and Rituals Bates stamped SF00033 through 40	152
25	(Exhibits attached.)	

Page 5

1  
2           **INFORMATION REQUESTED**  
3    (Request.)     Page 48  
4    (Request.)     Page 101  
5    (Request.)     Page 106  
6    (Request.)     Page 113  
7  
8  
9  
10  
11  
12  
13  
14  
15  
16  
17  
18  
19  
20  
21  
22  
23  
24  
25

Page 6

1           (Document headed Biography on Keith  
2 Raniere, Founder & Developer of Rational Inquiry,  
3 Highly Confidential Bates stamped P000004995 was  
4 received and marked Defendant's Exhibit Raniere-1  
5 for Identification.)  
6           **THE VIDEOGRAPHER:** Today's date is March  
7 11, 2009, at the time indicated on the video screen.  
8 We're here in Florham Park, New Jersey, to take the  
9 deposition of Keith Raniere in the matter of NXIVM  
10 v. Sutton.  
11           At this time, will the attorneys please  
12 identify themselves and the clients they represent.  
13           **MR. KOFMAN:** Harold Kofman from Riker  
14 Danzig Scherer Hyland Perretti LLP and Anthony J.  
15 Sylvester from Riker Danzig Scherer Hyland Perretti  
16 LLP representing Morris Sutton, Rochelle Sutton and  
17 Stephanie Franco.  
18           **MR. LANDY:** Robert Landy from Friedman  
19 Kaplan Seiler & Adelman LLP on behalf of Interfor,  
20 Incorporated and Juval Aviv.  
21           **MR. SKOLNIK:** Peter Skolnik and Thomas  
22 Dolan of Lowenstein Sandler representing Rick Ross,  
23 The Ross Institute, Paul Martin and Wellspring.  
24           **MR. CAMPION:** Thomas Campion and Robert  
25 Leonard, Drinker Biddle & Reath, representing the

Page 7

1 witness, Keith Raniere.  
2           **MR. McGUIRE:** William McGuire, Tompkins  
3 McGuire Wachenfeld & Barry representing NXIVM, Nancy  
4 Salzman and Kristin Keeffe.  
5           **MR. LEONARD:** Okay. Before we begin, on  
6 behalf of Keith Raniere, we are taking the position  
7 that this entire deposition is confidential. It  
8 should be maintained that way for at least 30 days  
9 pending whatever application either we make or the  
10 portions that we may designate if it's less than the  
11 whole thing, so I assume that's in accordance with  
12 our order and practice and that there should be no  
13 problem.  
14           **MR. KOFMAN:** We have no objection.  
15           **THE VIDEOGRAPHER:** Please swear in the  
16 witness.  
17           **MR. McGUIRE:** Wait a minute.  
18           **MR. LANDY:** We don't object to having  
19 the transcript being held confidential for the next  
20 30 days in its entirety. However, we would request  
21 that by the end of that 30-day period counsel for  
22 the witness designate which portions of the  
23 transcript they intend to keep confidential for the  
24 entirety of the litigation. If you choose to  
25 designate the entirety, send a letter saying so.

Page 8

1           **MR. LEONARD:** That's fine.  
2           **MR. SKOLNIK:** I join in Mr. Landy's  
3 position that maintaining confidentiality for 30  
4 days is acceptable. At the end of 30 days, we'll  
5 expect that the portions of deposition that you  
6 intend to keep confidential are so designated; and  
7 we reserve our right to make any objections.  
8  
9           **KEITH ALAN RANIERE**, residing at  
10 3 Flintlock Lane, Clifton Park, New York 12065,  
11 is duly sworn and testifies on his oath as follows:  
12  
13           **DIRECT EXAMINATION BY MR. KOFMAN:**  
14           **Q.** Good morning, Mr. Raniere. My name is  
15 Harold Kofman. I'm representing Morris Sutton,  
16 Rochelle Sutton, and Stephanie Franco in the lawsuit  
17 that was initiated by NXIVM Corp. And First  
18 Principles, Inc.  
19           I'm going to be taking your deposition today.  
20 Have you ever had your deposition taken before?  
21           **A.** Yes.  
22           **Q.** On how many occasions?  
23           **A.** Two, I think.  
24           **Q.** And when did you have your deposition taken?  
25           **A.** The date?

Page 9

1 Q. Approximately.  
 2 A. 1993. Maybe it was the spring -- I'm not  
 3 sure -- and I think later than that. I think it was  
 4 1995.  
 5 Q. Were those depositions in connection with  
 6 Consumers' Buyline?  
 7 A. Yes.  
 8 Q. I'm going to just run --  
 9 A. I'm sorry. There was a third deposition.  
 10 Q. When was that?  
 11 A. That was also -- I believe that was 1994.  
 12 Q. And was that also in connection with  
 13 Consumers' Buyline?  
 14 A. Yes.  
 15 Q. Mr. Raniere, I'm just going to run over a  
 16 few of the ground rules of the deposition since it's  
 17 been awhile since you've had your deposition taken.  
 18 I'm going to be asking you a series of  
 19 questions today. My questions and your answers are  
 20 being recorded by the court reporter sitting to my  
 21 right. In addition, there's a videographer who's  
 22 recording this deposition.  
 23 It's important that you wait till I finish  
 24 my question before answering. It makes a cleaner  
 25 record, and also that way I can be sure that you

Page 10

1 understand my question. If you don't understand my  
 2 question, please let me know, and I'll try and  
 3 rephrase it if I can.  
 4 You're being represented by counsel today.  
 5 If your counsel makes an objection, stop and wait  
 6 for your counsel to finish the objection. It's  
 7 important that you answer verbally, since the court  
 8 reporter can't take down shrugs and so forth.  
 9 Finally, if you need a break at any point  
 10 today, please let me know, and I'll be happy to take  
 11 a break at a convenient moment.  
 12 MR. LEONARD: Mr. Kofman, just for the  
 13 record, Mr. Rick Ross has joined the deposition; and  
 14 I would ask that his counsel advise him of the  
 15 confidentiality that we've previously discussed and  
 16 he's agreed to on his behalf.  
 17 MR. SKOLNIK: I will do so.  
 18 MR. LEONARD: Thank you.  
 19 BY MR. KOFMAN:  
 20 Q. Okay. Mr. Raniere, I'd like to show you a  
 21 document that we've marked as Raniere-1, and I've  
 22 got additional copies for counsel here.  
 23 MR. KOFMAN: For the record, this  
 24 document --  
 25 MR. SYLVESTER: Wait. Wait. Let me

Page 11

1 have those.  
 2 MR. KOFMAN: For the record, this  
 3 document is Bates stamped P000004995 and P000004996.  
 4 It's a document that was produced to my client in  
 5 discovery.  
 6 BY MR. KOFMAN:  
 7 Q. Sir, do you recognize this document?  
 8 A. Not directly, but documents of this similar  
 9 form.  
 10 Q. Okay, meaning -- and what is this document?  
 11 A. It looks like a biography of me.  
 12 Q. Do you know who prepared this biography?  
 13 A. No.  
 14 Q. Have you reviewed this or similar biographies  
 15 prepared by NXIVM?  
 16 A. I haven't reviewed this one. I have seen  
 17 similar biographies.  
 18 Q. Okay, and did you review similar biographies?  
 19 A. Yes.  
 20 Q. And did you review them to make sure they  
 21 were accurate?  
 22 A. Yes.  
 23 Q. Is there anything on this biography -- and  
 24 you can take the time to read it -- that is  
 25 inaccurate?

Page 12

1 A. Before finishing the document, there are a  
 2 number of things that if I were asked to approve  
 3 this I would not.  
 4 Q. Can you give me examples?  
 5 A. Problem-solving ability is better than 1 in  
 6 425 million, it would have to say "estimated";  
 7 things along those lines. Also, there are things of  
 8 -- I don't -- people write a number of different  
 9 things. I think factually this is true so far, but  
 10 I can say I probably did not review this one.  
 11 Q. Okay. How about the reference about halfway  
 12 down to you having total retention?  
 13 A. Uh-huh.  
 14 Q. Is that something that you would consider  
 15 accurate?  
 16 A. Yes, as far as what some someone who would  
 17 measure retention. Does that mean that I remember  
 18 everything? No. I go to the supermarket and forget  
 19 things like everyone else.  
 20 Q. Do you know what -- whether this document was  
 21 used by NXIVM?  
 22 A. No.  
 23 Q. Okay. Just out of curiosity, the symbols  
 24 that appear on the left-hand column, do you know  
 25 what they are?

1 A. The Executive Success Programs, to the best  
 2 of my knowledge, yes.  
 3 Q. Okay.  
 4 A. My suspicion -- well, continue.  
 5 Q. Okay. That's all the questions I have right  
 6 now about that document.  
 7 Mr. Raniere, have you ever met Morris Sutton?  
 8 A. Yes.  
 9 Q. When did you meet Morris Sutton?  
 10 A. In the courtroom when we were all together.  
 11 Q. Would that have been sometime in 2007-2008?  
 12 A. Yeah.  
 13 Q. Did you ever meet him before that?  
 14 A. No.  
 15 Q. Have you ever spoken to him?  
 16 A. No.  
 17 Q. Have you ever met Rochelle Sutton?  
 18 A. No.  
 19 Q. Have you ever spoken to Rochelle Sutton?  
 20 A. No.  
 21 Q. Are you aware as you sit here today that  
 22 Nancy Salzman visited the home of Morris and  
 23 Rochelle Sutton at some point in time?  
 24 A. I believe that's true.  
 25 Q. When did you become aware of that?

1 A. Yes.  
 2 Q. When did you first become familiar with  
 3 Ms. Franco?  
 4 A. I think I was told that she was attending an  
 5 Intensive. I'm not sure if it was before that point  
 6 that I had heard or actually while she was at the  
 7 Intensive.  
 8 Q. Okay. And who told that you she was  
 9 attending an Intensive?  
 10 A. I'm not sure.  
 11 Q. Was it Nancy Salzman?  
 12 A. I don't think so. My suspicion is it was  
 13 Michael Sutton.  
 14 Q. Okay, and is it your understanding that  
 15 Michael Sutton is the half-brother of Stephanie  
 16 Franco?  
 17 A. Yes.  
 18 Q. And am I correct that at the time Michael  
 19 Sutton was a student of Executive Success Programs?  
 20 A. To the best of my knowledge.  
 21 Q. Do you recall what Michael told you about  
 22 Stephanie Franco at the time?  
 23 A. I seem to remember that she had a therapy  
 24 practice, and she was either -- some sort of an  
 25 educator at Rutgers University.

1 A. I think it was slightly after it happened.  
 2 It is my recollection she was invited to a party.  
 3 Should I -- 'cause Nancy is in the room, my tendency  
 4 would be to look to see if that's so, but that's  
 5 what my recollection is.  
 6 Q. Okay, and did Nancy Salzman tell you that she  
 7 had gone to the Sutton's home?  
 8 A. I don't recall.  
 9 Q. Did you know who invited her to the party?  
 10 A. No.  
 11 Q. Do you know what was discussed there?  
 12 A. I believe, amongst other social things,  
 13 enrolling some people in taking a course, although  
 14 I'm not positive of that. I have a recollection  
 15 that there actually was a course taught.  
 16 Q. Are you aware that at some point a course  
 17 was taught at the home of Aaron and Leslie Kassin?  
 18 A. I don't know where, but I do have a  
 19 recollection that there was a course taught, yes.  
 20 Q. Do you know what course was taught?  
 21 A. Not specifically.  
 22 Q. Did you attend the teaching of the course  
 23 down in New Jersey at the home of the Kassin's?  
 24 A. No.  
 25 Q. Are you familiar with Stephanie Franco?

1 Q. And what did Michael tell you at the time  
 2 about Ms. Franco's therapy practice?  
 3 A. I'm not sure if it was Michael.  
 4 Q. It might have been somebody else?  
 5 A. Yeah, and I don't have any details other than  
 6 that she had a minor therapy practice which when  
 7 someone comes to the Intensive requires further  
 8 review.  
 9 Q. Okay. This is something that -- you were  
 10 told about her therapy practice either before or at  
 11 the time she attended the Intensive?  
 12 A. Yes.  
 13 Q. What -- you mentioned that when somebody has  
 14 a therapy practice, it requires further review.  
 15 What is the nature of the review that is required?  
 16 A. I'm not sure of all the details, but we want  
 17 to guard trade secrets and things that are important  
 18 and confidential so they want -- there is a review  
 19 so that there's no conflict of interests and no  
 20 future conflict of interests.  
 21 Q. Do you know who performs the review?  
 22 A. No.  
 23 Q. Do you know what the nature of the review  
 24 would be?  
 25 A. Not exactly, except for what I mentioned.

1 Q. Okay. Is it -- does the review involve a  
 2 discussion with the student?  
 3 A. I think sometimes.  
 4 Q. Do you know who does those discussions?  
 5 A. No. I think various people.  
 6 Q. Is that something that you're involved with?  
 7 A. No.  
 8 Q. Do you know whether a review was done in the  
 9 case of Stephanie Franco?  
 10 A. Yes.  
 11 Q. Do you know who did the review?  
 12 A. Not exactly. I know the results of the  
 13 review because I spoke to Stephanie Franco  
 14 afterwards.  
 15 Q. Okay, and when did you speak with Stephanie  
 16 Franco?  
 17 A. I think it was Day 5 of the Intensive. It  
 18 might have been Day 4.  
 19 Q. Did you attend the Intensive that she was  
 20 participating in?  
 21 A. Not directly. I may have given a  
 22 question-and-answer session, but I'm not positive.  
 23 Q. Okay. Do you recall if the year was 2001  
 24 that this Intensive took place?  
 25 A. I don't recall.

1 involved in the conversation were yourself,  
 2 Stephanie Franco, and possibly Nancy Salzman?  
 3 A. Correct.  
 4 Q. How long did the discussion -- how long did  
 5 the discussion take place?  
 6 A. I'm just guessing a relatively short time,  
 7 maybe a half hour.  
 8 Q. Was this during a break in the training  
 9 session?  
 10 A. Yes, I believe so.  
 11 Q. What was discussed?  
 12 A. Stephanie Franco wanted to apologize. She  
 13 expressed -- originally coming into the training she  
 14 was concerned about the nondisclosure agreement, the  
 15 long form; and my understanding is that NXIVM gave  
 16 her the ability to go and discuss it with an  
 17 attorney and take time with it -- I would not meet  
 18 with her until that form was signed -- which she did  
 19 and then apologized for the delay, but I had felt at  
 20 the time the delay is perfectly reasonable.  
 21 She was seemingly very excited about the  
 22 material and said that she wanted to go and become a  
 23 trainer with us. We also spoke of -- she said that  
 24 she was a seeker and wanted to find out the way, you  
 25 know, the human mind and all works to some degree

1 Q. Do you have a recollection as to --  
 2 A. I think it was --  
 3 Q. -- what year it was?  
 4 A. I think it was 2001.  
 5 Q. Do you remember the time of year?  
 6 A. I think it was spring.  
 7 Q. Okay. Now, you say you spoke to Stephanie on  
 8 the -- I think you said the fifth day of the  
 9 Intensive.  
 10 A. Fourth or fifth.  
 11 Q. Where did that discussion take place?  
 12 A. At the 455 New Karner Road Center.  
 13 Q. And is that a training center for Executive  
 14 Success Programs?  
 15 A. Yes, amongst other things, I think.  
 16 Q. Okay. Is it also the headquarters of NXIVM?  
 17 A. I think it might serve as that function in  
 18 part, but no. They have other meetings other than  
 19 trainings there.  
 20 Q. Okay. Who was present when you spoke to  
 21 Ms. Franco?  
 22 A. I think Nancy was present, although I'm not  
 23 positive. There may have been other people in the  
 24 room but not directly involved in the conversation.  
 25 Q. Okay. So the people you recall being

1 and found this an interesting supplement.  
 2 Q. Okay. At any time before the fifth day of  
 3 the Intensive when you spoke to Stephanie Franco,  
 4 were you aware of an issue involving the  
 5 confidentiality agreement and Stephanie Franco?  
 6 A. Could you repeat the beginning of that  
 7 question?  
 8 Q. Prior to meeting with Stephanie on the fifth  
 9 day of the Intensive, were you aware of any issue  
 10 that had arisen concerning her signing the  
 11 nondisclosure confidentiality agreement?  
 12 A. I believe it was before that point because  
 13 specifically I would not meet with her unless she  
 14 signed it, so I think it was somewhere around the  
 15 second day I heard that she had questions.  
 16 Q. From who did you hear that she had questions?  
 17 A. I'm not sure. I would suspect it was Nancy.  
 18 Q. Okay, and did you have any further  
 19 discussions between the second day and the fifth day  
 20 about Stephanie and the long form confidentiality  
 21 agreement?  
 22 A. No. It's my recollection that I was asked  
 23 what my opinion was in general with someone who  
 24 wants to consider something like that. I think  
 25 they should.

1 Q. Did you speak to -- when you spoke to  
 2 Stephanie on the fifth day, did you speak about her  
 3 thera -- to her about her therapy practice?  
 4 A. Not specifically. I believe she mentioned  
 5 her therapy practice, although I'm not positive that  
 6 she did. More that she was looking to help people,  
 7 and she felt that we had some interesting tools.  
 8 Q. During this discussion with Stephanie or  
 9 possibly during the question-and-answer session you  
 10 may have done, was there any discussion about your  
 11 view of paying taxes?  
 12 A. I don't know. That has come up a number of  
 13 times, but I don't remember if it was in that  
 14 discussion.  
 15 Q. What is -- what do you state about your view  
 16 of paying taxes?  
 17 A. I think people should consider paying taxes.  
 18 I think they should question if they believe in such  
 19 a system or not. I'm a believer in paying taxes,  
 20 but I don't believe in believing without question.  
 21 Q. Do you believe payment of taxes should be  
 22 compulsory?  
 23 A. I guess I don't -- I think it's ethical.  
 24 Q. I'm sorry. You believe it is ethical to  
 25 compel the payment of taxes?

1 Q. Back in 2001, what was your role in NXIVM?  
 2 A. I'm the philosophical founder and the person  
 3 who answers the questions relating to -- the  
 4 ultimate questions relating to the education, the  
 5 philosophy. I also help solve problems within the  
 6 organization.  
 7 Q. Do you hold a title in the organization?  
 8 A. Yes.  
 9 Q. And what's the title?  
 10 A. Vanguard.  
 11 Q. Do you hold any other titles in the  
 12 organization?  
 13 A. No.  
 14 Q. Are you an officer in NXIVM?  
 15 A. No.  
 16 Q. Have you ever been an officer?  
 17 A. No.  
 18 Q. Okay. Were you employed by NXIVM in 2001?  
 19 A. No.  
 20 Q. Have you ever been employed by NXIVM?  
 21 A. No.  
 22 Q. How about First Principles? Have you ever  
 23 been employed by First Principles?  
 24 A. No.  
 25 Q. Was it common -- strike that.

1 A. No. I think it's ethical to pay taxes.  
 2 Q. Oh, okay. Did you discuss with Stephanie  
 3 either during this private discussion or during  
 4 question-and-answer your views on the institution of  
 5 marriage?  
 6 A. I don't believe so. I wouldn't.  
 7 Q. Okay. Other than this one conversation with  
 8 Stephanie Franco on the fifth day of the Intensive,  
 9 have you had any other discussions with Ms. Franco?  
 10 A. I'm not sure. I don't think so.  
 11 Q. Have you ever seen the -- strike that.  
 12 You said that it's your understanding that  
 13 Stephanie Franco had signed the long form  
 14 confidentiality agreement.  
 15 What's the basis for that understanding?  
 16 A. She told me so.  
 17 Q. What did she specifically say, if you recall?  
 18 A. "I apologize for taking so long to sign this  
 19 agreement. I felt I needed to consider it, and I  
 20 did, and I am very happy that I've signed it."  
 21 Also, I would not have met with her if she  
 22 didn't go through that portion of it.  
 23 Q. Have you ever seen the long form  
 24 confidentiality agreement that she signed?  
 25 A. No.

1 Was it common for you to -- in 2001 to attend  
 2 in part Intensives?  
 3 A. At times.  
 4 Q. How frequently would you be consulted back in  
 5 2001 on issues of philosophy or questions that --  
 6 about NXIVM?  
 7 A. You know, I'm not sure at that point in time.  
 8 I suspect maybe once a month in a question-answer  
 9 type of forum or someone asking a direct question.  
 10 Q. What type of issues would be brought to your  
 11 attention about NXIVM?  
 12 You mentioned the issue about Stephanie and  
 13 the confidentiality agreement. What are some of the  
 14 other types of issues that were brought -- would be  
 15 brought to your attention by someone at NXIVM?  
 16 A. I'm trying to go back to that time period.  
 17 Normally they're questions of ethics,  
 18 things -- for example, NXIVM has a sales force. If  
 19 two salespeople have approached the same client,  
 20 what are the guidelines to try to handle that sort  
 21 of a thing or what guidelines would I suggest, that  
 22 sort of a thing.  
 23 Q. What are you -- who are the people who would  
 24 consult you about those things or who would at that  
 25 period of time?

Page 25

1 A. Nancy, some of the people that I know  
 2 indirectly. I don't know the specific. I -- for  
 3 example, if I answered questions at an Intensive or  
 4 something like that or I walked into the building,  
 5 anyone that asked me questions I would answer them.  
 6 Q. Okay. How many hours a month were you  
 7 devoting to NXIVM during let's say 2001?  
 8 A. I don't know. I would estimate maybe 20.  
 9 Q. Twenty?  
 10 A. Yes.  
 11 Q. And was most of that attending these  
 12 question-and-answer things or answering issues that  
 13 came up?  
 14 A. Yes, I would say so.  
 15 Q. Has that involvement of 20 hours a month  
 16 changed since 2001?  
 17 A. Yeah. It's gone down.  
 18 Q. Okay. Was there ever a period during which  
 19 it increased?  
 20 A. No.  
 21 Q. What would you say -- what would you estimate  
 22 at -- in 2007 and 2008 how much time would you spend  
 23 on NXIVM-related issues?  
 24 A. 2007-2008?  
 25 Q. On a monthly basis.

Page 26

1 A. I want to amend something I said. When you  
 2 say "NXIVM-related issues," can you be more  
 3 specific?  
 4 Q. Sure. Issues relating to the operation of  
 5 the Intensives --  
 6 A. Okay.  
 7 Q. -- or the operations of the Executive Success  
 8 Programs.  
 9 A. I don't know, maybe -- maybe that much or  
 10 less. I'm thinking more like 10 hours a week; not a  
 11 week. I mean a month.  
 12 Q. Sure. Do you -- in 2001, were you still  
 13 developing modules or programs for NXIVM to use?  
 14 A. Yes.  
 15 Q. And is that included in the 10 to 20 hours?  
 16 A. To some degree. I walk around thinking about  
 17 these things a lot, so that's part of why I feel I  
 18 can't adequately answer your question. I teach  
 19 voice lessons to people who are in NXIVM, piano,  
 20 various activities like that which I don't count in  
 21 there.  
 22 Q. Okay. Do you still -- in 2007, 2008, were  
 23 you still involved in developing course material?  
 24 A. Yes.  
 25 Q. And that's something you're presently

Page 27

1 involved with --  
 2 A. Yes.  
 3 Q. -- as well?  
 4 A. Yes.  
 5 Q. And how much time would you say you spend on  
 6 a monthly basis developing course material?  
 7 A. I walk around thinking about it a lot, but  
 8 the actual formal time?  
 9 Q. Uh-huh.  
 10 A. If we put out, say, one Intensive a year, and  
 11 let's say an Intensive is 80 hours, probably 40  
 12 hours a year devoted to that.  
 13 Q. When you say, "We put out one Intensive,"  
 14 what do you mean by that?  
 15 A. In other words, I'm looking over the past  
 16 few years; and I'm thinking of the curriculum that  
 17 has been created, and I estimate we've in the past  
 18 few years introduced one Intensive a year.  
 19 Q. That would be one new set of course --  
 20 courses?  
 21 A. The particular ones that have been in the  
 22 past few years have been eight-day seminars.  
 23 Q. Okay.  
 24 A. There have been a few occasions where there  
 25 have been modules, single two-hour. We offer all of

Page 28

1 our curriculum, per se, in two-hour blocks. I don't  
 2 think there has been one of those in the past year.  
 3 Q. Mr. Ranieri, do you know why you were  
 4 consulted about the issue involving Stephanie Franco  
 5 and the long form confidentiality agreement?  
 6 MR. McGUIRE: Object to the form.  
 7 Q. Did whoever told you about the issue tell  
 8 you why they were bringing this to your attention?  
 9 A. No.  
 10 Q. Do you have any understanding as to why you  
 11 were called upon to give advice?  
 12 MR. McGUIRE: Same objection.  
 13 Q. You may answer if you can.  
 14 A. Okay. Often when there are ethics questions,  
 15 they're brought to me for an opinion.  
 16 Q. Would you also handle questions about  
 17 procedure, what procedure NXIVM should follow?  
 18 A. If there was an ethics question involved, I  
 19 might.  
 20 Q. Wouldn't -- would you consider this to have  
 21 been an ethics question?  
 22 A. Stephanie Franco and the -- yes.  
 23 Q. And why would you consider this an ethics  
 24 question?  
 25 A. Because if NXIVM has a rule that all people

Page 29

1 must sign the long form on the first day, but yet  
 2 there's a reasonable, seemingly reasonable reason  
 3 why someone would not want to do that, any time you  
 4 question breaking a rule you have to consult the  
 5 ethic of the rule to get the spirit, the intent of  
 6 the rule.  
 7 Q. And that's something that you would be most  
 8 familiar with in NXIVM?  
 9 A. Well, I think I add good opinion.  
 10 Q. Okay. Do you know -- you mentioned that a  
 11 review would have been done because Stephanie took  
 12 -- indicated that she had a small therapy practice.  
 13 Do you know what the results of the review  
 14 were?  
 15 A. No. I -- I do know that she was allowed to  
 16 take the Intensive, so whatever you would call;  
 17 favorable or nonconflicting, I guess, because if it  
 18 was a conflict of interest, she would not have been  
 19 allowed to take the Intensive.  
 20 Q. In 2001 were you told or made aware that  
 21 Stephanie had taken classes with Taibbi Kahler  
 22 Associates?  
 23 A. No.  
 24 Q. Are you familiar with Taibbi Kahler  
 25 Associates?

Page 30

1 A. Somewhat now.  
 2 Q. Were you familiar back in 2001?  
 3 A. No.  
 4 Q. Do you know what course material Stephanie  
 5 was provided at NXIVM?  
 6 A. Not specifically.  
 7 Q. Has anyone ever told you what she was  
 8 provided?  
 9 A. I've seen lists; and I know that she was a  
 10 coach, which means there is certain course materials  
 11 she was exposed to. I also know that she was  
 12 selected to be in a facilitator training, which I  
 13 did also see a document that referenced.  
 14 Q. You stated that she was a coach. Is it your  
 15 understanding that Stephanie Franco was a coach at  
 16 NXIVM?  
 17 A. Yes.  
 18 Q. What are the re -- what were the requirements  
 19 in 2001 for becoming a coach at NXIVM?  
 20 A. I don't remember exactly; but they have to  
 21 express a willingness to want to coach people,  
 22 mentor people, learn the curriculum. I don't know  
 23 how that procedure was handled.  
 24 Q. Who is the person at NXIVM who has an  
 25 understanding as to how people become coaches or in

Page 31

1 2001 how they became coaches?  
 2 A. I don't know.  
 3 Q. Would that be Nancy Salzman's responsibility  
 4 for overseeing the making of coaches?  
 5 A. Well, I think she could find that out. I  
 6 don't -- she is not the person who would directly do  
 7 that I don't believe.  
 8 Q. But that's not something you were involved  
 9 with in 2001?  
 10 A. Correct.  
 11 Q. Who told you that or how did you come to  
 12 learn that Stephanie Franco was a coach?  
 13 A. 'Cause I heard that she was going to Mexico  
 14 to coach an Intensive. I also heard I believe that  
 15 she didn't show up, and I don't know what -- there  
 16 was some concern that I recall. I don't know if  
 17 they were relying on her, didn't get off the plane,  
 18 or I don't know what the details are.  
 19 Q. Who told you that Nancy -- that -- I'm sorry  
 20 -- that Stephanie had become a coach?  
 21 A. I don't remember.  
 22 Q. Who told you that she was going to Mexico?  
 23 A. I don't remember.  
 24 Q. Okay. Who told you that she didn't show up  
 25 in Mexico?

Page 32

1 A. I assume it's probably the same person. I  
 2 don't remember.  
 3 Q. Okay. Have you ever seen any documents that  
 4 indicate that Stephanie was a coach at NXIVM?  
 5 A. I've seen that she had coach notes and  
 6 facilitator notes; and by reason of the fact that  
 7 in order to get those one must be a coach, I assume  
 8 she is. I've also heard that there was a video  
 9 segment of her coach promotion in this legal  
 10 proceeding.  
 11 Q. Have you seen that video?  
 12 A. No.  
 13 Q. When did you learn that Stephanie had left  
 14 NXIVM?  
 15 A. I think it must have been shortly after she  
 16 didn't show up to Mexico.  
 17 Q. Do you remem -- was that 2001?  
 18 A. If that's when she took her In -- her first  
 19 Intensive that year, in that spring, I think I  
 20 recall that it was that fall.  
 21 Q. Okay. Do you know on how many -- how many  
 22 Intensives Stephanie participated in?  
 23 A. I think at least two.  
 24 Q. Okay. Do you know whether she completed the  
 25 second Intensive that she took?



Page 33

1 A. No.  
2 Q. Would someone be made a coach if they hadn't  
3 completed a second Intensive in 2001?  
4 A. I don't know.  
5 Q. Did you have any responsibility for designing  
6 -- for creating the procedure or the requirements  
7 for making of coaches?  
8 A. Initially.  
9 Q. When was that?  
10 A. 1997, I think.  
11 Q. How about in 2001?  
12 A. No. It evolved from there, and I don't know.  
13 Q. Do you know if there were any changes -- so  
14 there were changes in the procedure for making  
15 coaches between 1997 and 2001?  
16 A. I believe so.  
17 Q. Do you know what they are?  
18 A. No.  
19 Q. Other than being told that Stephanie hadn't  
20 shown up in Mexico, did you have any other  
21 discussions about her ending her relationship with  
22 NXIVM?  
23 A. I think after that point at one point Michael  
24 mentioned that she was discontent. I think that is  
25 so.

Page 34

1 Q. Did he mention that to you?  
2 A. Yes.  
3 Q. Do you remember when that --  
4 A. I think that was so.  
5 Q. Sorry to interrupt you.  
6 Do you remember when that conversation took  
7 place with Michael?  
8 A. No.  
9 Q. How much -- how long after the fall of 2001  
10 did that take place?  
11 A. I'm not really sure. I would imagine it  
12 would be in the fall of 2001. What I imagine would  
13 have gone on is I would have heard that Stephanie  
14 did not go to the Intensive, did not show up. I  
15 have an image of Michael saying she was discontent  
16 in my mind. That's why I think I had that  
17 conversation.  
18 I probably would follow up to find out what  
19 happened with Stephanie. And because Michael is her  
20 half-brother, I might have asked him.  
21 Q. Where did this conversation with Michael take  
22 place?  
23 A. I don't know.  
24 Q. Was it at 455 Karner Road?  
25 A. I don't know.

Page 35

1 Q. Do you know why Michael brought this to your  
2 attention?  
3 A. I might have brought it to his attention  
4 because she didn't show up at the Intensive,  
5 although I'm not sure. Michael and I are friends.  
6 Q. Okay, and were friends in 2001?  
7 A. Yes.  
8 Q. Okay. Did Michael explain to you why  
9 Stephanie was discontent?  
10 A. No. I -- I can try to reconstruct, but I  
11 don't think he gave me much detail. I think Michael  
12 speaks very honorably; and I think he would just  
13 say, well, she didn't -- it didn't work out. It's  
14 something she didn't want to do.  
15 Q. When he said she was discontent or didn't  
16 want to do it, did you ask why?  
17 A. I probably wouldn't. I don't remember.  
18 Q. Okay. How long have you known Michael  
19 Sutton?  
20 A. Since probably about 2001.  
21 Q. Okay, and have you been friends with him  
22 continuously since that time?  
23 A. Yes.  
24 Q. How did you become friendly with Michael  
25 Sutton?

Page 36

1 A. I don't remember exactly. He has an interest  
2 in technology. He has an interest in business and  
3 business ventures, so that's what we speak about.  
4 Q. How often do you talk to Michael Sutton?  
5 A. Now, once or twice a year maybe.  
6 Q. Was there ever a time when Michael Sutton  
7 moved up to the -- from -- strike that.  
8 Were you aware that when Michael started  
9 taking the classes he would have been in the New  
10 York City area?  
11 A. I was aware he lived downstate.  
12 Q. Was there ever a time that he moved up to the  
13 Albany area?  
14 A. Yes.  
15 Q. And do you know when that was?  
16 A. No.  
17 Q. Did you ever talk to him about his reasons  
18 for moving up to the Albany area?  
19 A. No.  
20 Q. After your discussion with Michael in the  
21 fall of 2001, when's the next time you had a  
22 discussion with him about Stephanie Franco?  
23 A. I don't really remember.  
24 Q. Did you have any other discussions with him  
25 about Stephanie Franco?

Page 37

1 A. I think over the years because of this  
 2 litigation there have been mention. I recall -- I  
 3 don't know if it was with him and someone else or  
 4 with someone else. It came to NXIVM either before  
 5 the litigation or during the litigation; and because  
 6 the litigation affected his father, the question was  
 7 should he be consulted. What are the ethics around  
 8 that, so it was my belief that he should be asked  
 9 certainly in the least his opinion on going forward  
 10 with such a lawsuit.  
 11 Q. And so at some -- if I understand you  
 12 correctly, at some point in time, the issue was  
 13 raised as to whether or not Michael should be  
 14 consulted about a lawsuit being brought against his  
 15 father?  
 16 A. Yes.  
 17 Q. Who brought that to your attention?  
 18 A. I don't remember.  
 19 Q. And your response was he should be consulted?  
 20 A. Uh-huh.  
 21 Q. And what was Mich -- I'm sorry. You have to  
 22 answer verbally.  
 23 A. Oh, yes.  
 24 Q. And what was Michael -- were you present when  
 25 that discussion took place with Michael?

Page 38

1 A. No.  
 2 Q. Do you know what Michael's response was?  
 3 A. My understanding is that he believed that the  
 4 lawsuit should go forward.  
 5 Q. I represent to you that the lawsuit was  
 6 initially brought in August of 2003.  
 7 Were you consulted about bringing the  
 8 lawsuit?  
 9 A. I believe so, yes.  
 10 Q. By whom? And I don't want conversations with  
 11 attorneys.  
 12 A. Then I don't -- I think it might have been.  
 13 MR. CAMPION: Okay, that's it then.  
 14 Q. You can tell me who the -- who did you have  
 15 the conversation with?  
 16 MR. CAMPION: You may tell him who.  
 17 A. Arlen Olsen.  
 18 Q. And did he represent you individually?  
 19 A. Yes.  
 20 Q. And did you discuss with anyone else the  
 21 bringing of the lawsuit?  
 22 A. I think after that point, yes.  
 23 Q. Did -- before it was filed, did you discuss  
 24 with anyone besides Arlen Olsen the desirability of  
 25 bringing a lawsuit?

Page 39

1 A. Yeah. I'm sure that was -- that I was asked  
 2 my opinion on that.  
 3 Q. Who was present when that conversation took  
 4 place?  
 5 A. I don't remember.  
 6 Q. Did you have a retainer agreement with  
 7 Arlen Olsen at that time?  
 8 MR. CAMPION: I think that's privileged.  
 9 MR. KOFMAN: I disagree.  
 10 BY MR. KOFMAN:  
 11 Q. Was he representing you in connection with  
 12 this lawsuit or this dispute?  
 13 A. I'm not a party. I was not a party to this  
 14 lawsuit or dispute, as far as I know.  
 15 Q. Was he discussing with you as a  
 16 representative -- was he discussing the issue with  
 17 you as a representative of NXIVM?  
 18 MR. CAMPION: Read the question again.  
 19 (The following was read back by the  
 20 reporter:  
 21 "Was he discussing with you as a  
 22 representative -- was he discussing the issue with  
 23 you as a representative of NXIVM?")  
 24 MR. CAMPION: I think that goes to the  
 25 business of privilege.

Page 40

1 MR. KOFMAN: I don't believe that the  
 2 existence of a retainer agreement is subject to  
 3 privilege. I think I'm entitled to know whether  
 4 Arlen was representing Keith Raniere or NXIVM at the  
 5 time, since there appears to be a distinction.  
 6 MR. CAMPION: Why don't you and I  
 7 discuss this point at a break, okay.  
 8 MR. KOFMAN: We can agree to discuss  
 9 this at a break.  
 10 BY MR. KOFMAN:  
 11 Q. Mr. Raniere, when did you -- did there come a  
 12 point in time where you learned that Rick Ross had  
 13 been hired in connection with Michael Sutton?  
 14 A. Yes.  
 15 Q. When did you first learn that?  
 16 A. I believe it is my recollection that Michael  
 17 was to meet with Rick Ross in Florida. I believe  
 18 before that point, Michael had a conversation with  
 19 me. I recall him saying, "My family wants me to  
 20 talk with this guy about NXIVM," and he described a  
 21 little bit relating to the -- what Rick Ross does  
 22 and said to me, "What do you think?"  
 23 Q. Were you familiar with Rick Ross at that  
 24 time?  
 25 A. No.

1 Q. Did you do any research about him at that  
2 time?  
3 A. No.  
4 Q. What did you tell Michael?  
5 A. "Sure."  
6 Q. So you advised Michael that he should meet  
7 with Rick Ross?  
8 A. Yeah. I think people should meet with anyone  
9 they want to.  
10 Q. Did you ask anybody at NXIVM to -- to check  
11 out who Rick Ross was?  
12 A. No.  
13 Q. What was the next con -- or next discussion  
14 you had with Michael about Rick Ross?  
15 A. Michael had mentioned to me -- and this must  
16 have been after they had their meeting/meetings --  
17 that Rick Ross had said to him that if I was in the  
18 Guinness Book of World Records, he would take the  
19 16-day Intensive; and then when it turned out that  
20 indeed I was, Rick Ross denied that that was ever  
21 said allegedly.  
22 Q. By the way, have you ever spoken to  
23 Rick Ross?  
24 A. No.  
25 Q. Would you have allowed Rick Ross to take the

1 that he believed in what he was doing.  
2 Q. Were you present when he signed his  
3 Affidavit?  
4 A. No, I don't think so.  
5 Q. Did you meet with him before he signed the  
6 Affidavit?  
7 A. No, I think it was in passing.  
8 Q. I'm sorry. It was in passing you met with  
9 him?  
10 A. I think I was either at 455 New Karner Road  
11 or somewhere like that and ran into him.  
12 Q. And what was said?  
13 A. I don't remember. It was casual.  
14 Q. Was -- have you had any other conversations  
15 with Aaron Kassin about Rick Ross?  
16 A. I believe so. I have a recollection of him  
17 saying that Rick Ross wanted our confidential  
18 materials. It is difficult for me to ascertain if  
19 that was a true conversation because I've also read  
20 that in the papers.  
21 Q. So at this point, you don't have any  
22 independent recollection of the conversation?  
23 A. No.  
24 Q. Mr. Raniere, did you -- are you aware as you  
25 sit here today that Michael Sutton tape recorded a

1 16-day Intensive?  
2 A. Potentially. We wanted the Forbes reporter  
3 to take the 16-day Intensive.  
4 Q. Would Rick Ross have had to sign any  
5 documents before taking the 16-day Intensive?  
6 A. Yes.  
7 Q. Such as?  
8 A. What every other student signs.  
9 Q. Other than conversations with Michael about  
10 Rick Ross, did you have -- strike that.  
11 Do you remember any other conversations that  
12 you had with Michael about Rick Ross?  
13 A. I only remember a comment. I don't know if  
14 it was a separate conversation. Michael thought  
15 Rick Ross was a nice guy.  
16 Q. Do you remember having any discussions with  
17 anybody else about the fact that Rick Ross was  
18 meeting with Michael?  
19 A. No.  
20 Q. Did you ever have any discussions with  
21 Aaron Kassin about Rick Ross?  
22 A. Yes.  
23 Q. When did that take place?  
24 A. Aaron Kassin came up to Albany -- I think it  
25 was to sign an Affidavit -- and he just affirmed

1 telephone conversation he had with Stephanie Franco?  
2 A. Yes.  
3 Q. How did you become aware of that?  
4 A. I think I had heard that there was a question  
5 of how the materials came to Rick Ross and that  
6 there's one rendition of it, one whatever it is,  
7 recitation of it where the materials went from  
8 Stephanie to her brother or half -- I'm not sure if  
9 it's brother or half-brother, and that brother gave  
10 the materials to Rick Ross.  
11 There's another rendition that Stephanie most  
12 directly either gave it immediately through her  
13 brother or to Rick Ross, and I think that tape  
14 recording says that Rick Ross -- that she intended  
15 to give the materials to Rick Ross.  
16 Q. Have you ever heard the tape recording?  
17 A. No.  
18 Q. Have you ever read a transcript of the tape  
19 recording?  
20 A. No.  
21 Q. What's your basis -- what's your -- what's  
22 the basis of your understanding of the tape  
23 recording?  
24 A. I believe Michael might have mentioned it  
25 in conversations, and I believe Kristin might have

Page 45

1 mentioned it; Kristin Keeffe.  
 2 Q. Did you -- were you aware before the tape  
 3 recording -- strike that.  
 4 Did you have a conversation with Michael  
 5 Sutton about the subject of his tape recording a  
 6 conversation with his sister?  
 7 A. Not that I recollect.  
 8 Q. Did Michael Sutton ask for your advice as to  
 9 whether or not he should tape record a conversation  
 10 with his sister?  
 11 A. I don't know. It's --  
 12 MR. SYLVESTER: Pardon me?  
 13 A. It's possible. That's something that he --  
 14 someone would bring to ask me.  
 15 Q. And do you recall what you said to him about  
 16 that?  
 17 A. I don't recall the conversation.  
 18 Q. As you sit here today, what would your  
 19 recommendation have been?  
 20 A. I think it depends on what the subject matter  
 21 of the conversation is. Do I believe in the taping  
 22 of phone calls? I think in states where it is legal  
 23 that is an option, depending on how a person feels  
 24 about the situation. So I would, one, suggest that  
 25 he find out if it's legal; and, two, I would suggest

Page 46

1 that he look at why he wants to do that and if he  
 2 wanted it to be concealed -- and I assume this tape  
 3 was concealed, that Stephanie did not know about it  
 4 or she claims that she did not know about it.  
 5 Q. I can't answer your question, sir.  
 6 A. Okay. I would suggest that he consider all  
 7 of those factors.  
 8 Q. Would you consider the taping of a  
 9 conversation or the concealed taping of a  
 10 conversation with a relative to be an ethical act?  
 11 A. It depends on the context.  
 12 Q. In this context.  
 13 A. I don't know enough about the context to make  
 14 that assessment.  
 15 Q. Okay. Did you ever see the tape that was  
 16 made?  
 17 A. I don't think so.  
 18 Q. Do you know what was done with the tape --  
 19 what Michael did with the tape that he made?  
 20 A. Well, my understanding is that one of the  
 21 NXIVM attorneys named Kevin Luibrand had a copy of  
 22 the tape.  
 23 Q. And what's the basis for that understanding?  
 24 A. I think Kevin Luibrand had said something  
 25 about it at one point. I also heard that I think it

Page 47

1 was Kristin, that the subject of this tape -- this  
 2 tape is either lost or -- well, it sounds like this  
 3 tape is lost but that there's a transcript that  
 4 Kevin Luibrand had or something like that in his  
 5 files, and I heard something about that.  
 6 Q. Kevin Luibrand -- Luibrand told you that he  
 7 had a copy of the tape?  
 8 A. I'm not sure.  
 9 MR. KOFMAN: We can take just a couple  
 10 minute break.  
 11 MR. CAMPION: Sure.  
 12 (At this point, there was a short  
 13 recess.)  
 14 THE VIDEOGRAPHER: This is the beginning  
 15 of Tape Number 2. The time is 11:35.  
 16 BY MR. KOFMAN:  
 17 Q. Okay. Mr. Raniere, before we took a break I  
 18 had asked you a couple of questions about Arlen  
 19 Olsen.  
 20 When you spoke with Mr. Olsen, were you  
 21 seeking legal advice from him?  
 22 A. I don't believe I was seeking legal advice.  
 23 Q. Did he provide you with legal advice?  
 24 A. I believe you'd call it that.  
 25 Q. And was that for you on an individual basis?

Page 48

1 A. I would -- I would interpret it that way.  
 2 Q. Okay. Did you have a written retainer  
 3 agreement with Mr. Olsen?  
 4 A. I'm not sure.  
 5 MR. KOFMAN: Okay. I'd like to make a  
 6 document request -- and I can follow up with a  
 7 letter -- for a copy of the written retainer  
 8 agreement between Mr. Raniere and Arlen Olsen.  
 9 MR. CAMPION: If there is one.  
 10 MR. KOFMAN: Okay.  
 11 (Request.)  
 12 BY MR. KOFMAN:  
 13 Q. Mr. Raniere, did you meet with counsel  
 14 prior to today's deposition to prepare for your  
 15 deposition?  
 16 A. Yes.  
 17 Q. And was that with Mr. Campion and  
 18 Mr. Leonard?  
 19 A. Yes.  
 20 Q. Was there anyone else present?  
 21 A. Yes.  
 22 Q. And who was that?  
 23 A. Nancy was present at one of the meetings,  
 24 although I'm not sure if you'd call that deposition  
 25 prep. They came up to meet me.

1 Q. Do you have -- we were talking a little bit  
2 about Michael Sutton and your relationship with him.  
3 You mentioned that you were friends.  
4 A. I'm sorry. Nancy was also there, yes, the  
5 other meeting, just to be clear.  
6 Q. Okay. Did you see him on -- do you see him  
7 or have you seen him in the past on a social basis?  
8 A. Michael Sutton?  
9 Q. Yes.  
10 A. Yes.  
11 Q. Do you have any business relationship with  
12 Michael Sutton?  
13 A. No.  
14 Q. During the --  
15 A. Not that I know of.  
16 Q. During the 2002-2003-2004 time period, how  
17 frequently would you see Michael Sutton?  
18 A. I don't know, once a month maybe.  
19 Q. And would that -- in what context? Would  
20 that be social visits or something related to NXIVM?  
21 A. Volleyball. He would come to volleyball at  
22 times.  
23 Q. Okay, and you would have discussions with him  
24 at that time?  
25 A. Yeah.

1 A. I don't know if it was NXIVM. I think it was  
2 First Principles, but I'm not positive.  
3 Q. Okay. Do you know if he's given any gifts to  
4 NXIVM or First Principles?  
5 A. I don't know if it's a gift, no. I don't  
6 know.  
7 Q. When you say you don't know that it's a gift,  
8 are you referring to the loan or --  
9 A. Right.  
10 Q. Okay. Do you know if he's given any gifts to  
11 Nancy Salzman?  
12 A. No, I don't know.  
13 THE VIDEOGRAPHER: Somebody turn off  
14 their BlackBerries. It's coming through very  
15 strong. Thank you.  
16 (A discussion was held off the record.)  
17 BY MR. KOFMAN:  
18 Q. When was the last time you spoke to Michael  
19 Sutton about this case?  
20 A. About this case? I think it was mentioned  
21 during Vanguard Week this year.  
22 Q. What is "Vanguard Week"?  
23 A. It's a corporate retreat where people from  
24 all over the world, the different areas where we  
25 teach education can come and be friends -- have, you

1 Q. And would NXIVM and this lawsuit be one of  
2 the things that was discussed?  
3 A. I imagine it would be mentioned at times, but  
4 that was not a major topic of discussion.  
5 Q. Are you aware that Michael Sutton has paid  
6 some portion of NXIVM's legal fees in this matter?  
7 A. No, I'm not specifically aware of that.  
8 Q. Did you have any discussions with him about  
9 payment of legal fees?  
10 A. Legal fees, no.  
11 Q. Has Michael Sutton given any gifts to you?  
12 A. No. He's loaned money but not a -- not a  
13 gift, as far as I know.  
14 Q. He's loaned money to you personally?  
15 A. No, it wasn't to me. I believe it was to  
16 NXIVM but it was -- I was doing some patent work,  
17 so to speak, or things that we were thinking of  
18 patenting which I ended up not relating to  
19 commodities market, stock market, things like that.  
20 Q. Okay. Do you remember how much he loaned to  
21 NXIVM?  
22 A. No.  
23 Q. Did you sign any loan documents --  
24 A. I don't --  
25 Q. -- with Michael?

1 know, common interests.  
2 Q. And does that coincide with your birthday?  
3 A. Yes.  
4 Q. When was the -- at that -- at Vanguard Week  
5 when you spoke to Michael, did you discuss the case?  
6 A. I think it literally went, "How's it going?"  
7 "Okay, as far as I know."  
8 There were other issues that he was  
9 discussing.  
10 Q. Do you remember what those were?  
11 A. Yes.  
12 Q. What were they?  
13 A. There are other business ventures that he and  
14 another person are involved in. There is science  
15 that he is keenly interested in, and he has  
16 representations from some scientists relating to  
17 some technology; and he wanted my opinion on not  
18 only how to evaluate the science but create tests so  
19 that he could evaluate the science of these things.  
20 Q. Without getting into details that I won't  
21 understand, what's the nature of the science that  
22 he's developing?  
23 A. I told him that I won't speak to anyone of  
24 this.  
25 Do you want me to -- I mean, I can try to

1 give you a general thing without violating a  
 2 confidence with him.  
 3 Q. If you -- if you could.  
 4 A. Um, there -- there is products that have  
 5 been brought to him that claims have been made.  
 6 His question is how can he verify that the products  
 7 can do the things that are claimed, so I gave him  
 8 some principles as to how to create double-blind  
 9 testing type of procedures and gave him some  
 10 understanding of the sorts of things that can go  
 11 wrong with these.  
 12 Q. Who is the person -- do you know the name  
 13 of the person with whom he's looking to go into  
 14 business?  
 15 A. Yes.  
 16 Q. And what is the person's name?  
 17 A. I also have a confidence. I -- I told him I  
 18 would not speak to anyone about these things.  
 19 Q. Is the person a NXIVM student?  
 20 A. Can you define what you mean by "NXIVM  
 21 student"?  
 22 Q. Is it someone who has taken NXIVM courses in  
 23 the past?  
 24 A. Yes.  
 25 Q. Is it someone who presently or who is a

1 of the individual?  
 2 A. The student?  
 3 Q. Yes.  
 4 A. I'm trying to think of his full -- I call him  
 5 "Maximus." I'm trying to think.  
 6 Do you mind if I ask Nancy what his full name  
 7 is?  
 8 MR. KOFMAN: Yeah. Go ahead.  
 9 THE WITNESS: Nancy, what's Maximus'  
 10 full name?  
 11 MS. SALZMAN: Sarzen.  
 12 THE WITNESS: Sarzen. Thank you. I was  
 13 going to call him Serzen.  
 14 BY MR. KOFMAN:  
 15 Q. Okay. Mr. Raniere, did it come to your  
 16 attention at some point that Rick Ross had posted  
 17 articles by John Hochman and Paul Martin on his  
 18 websites?  
 19 A. Yes.  
 20 Q. When did that come to your attention?  
 21 A. I think it was sometime shortly thereafter,  
 22 yes.  
 23 Q. I'm sorry. When you say "shortly  
 24 thereafter" --  
 25 A. I think within a month of when they were

1 member of NXIVM?  
 2 A. How do you define that?  
 3 Q. Is it somebody who presently takes courses  
 4 from NXIVM?  
 5 A. Can I say something that's important?  
 6 Q. Sure.  
 7 A. There is a person who took a NXIVM course  
 8 eight years ago. They come to volleyball now and  
 9 then. They're a friend. Are they part of NXIVM? I  
 10 mean, that's -- that's -- this is a person that has  
 11 taken NXIVM courses, has not taken NXIVM courses in  
 12 a long time, is a friend of mine.  
 13 Q. Does the person hold a rank in NXIVM?  
 14 A. Yes.  
 15 Q. What's the rank?  
 16 A. They're a proctor.  
 17 Q. Have they had any proctor duties in eight  
 18 years?  
 19 A. I don't know in eight years, but it's been a  
 20 number of years.  
 21 Q. Okay. I'm going to have to ask for the name  
 22 of -- and, again, the deposition transcript is  
 23 confidential and will be marked as confident --  
 24 A. Uh-huh.  
 25 Q. -- confidential, so can you tell me the name

1 posted.  
 2 Q. And do you remember what year that was?  
 3 A. It was 2003, I think.  
 4 Q. Okay. How did it come to your -- how did you  
 5 learn that articles had been posted?  
 6 A. Someone told me.  
 7 Q. Do you remember who it was?  
 8 A. I don't because I think there were several  
 9 people that told me.  
 10 Q. Do you remember any of the people who told  
 11 you that the articles had been posted?  
 12 A. I think Kristin told me, I think -- I don't  
 13 know if Nancy told me, but I'm pretty sure Kristin  
 14 told me.  
 15 Q. At any point before the articles were posted,  
 16 had you done any investigation into who Rick Ross  
 17 was?  
 18 A. I believe Michael -- well, Michael had told  
 19 me previous to his deprogramming or meeting or  
 20 whatever you call it that Rick Ross was a -- I  
 21 believe a deprogrammer or someone like that.  
 22 I don't know if it was before the website  
 23 went up that I heard more information relating to  
 24 Rick Ross, but it was somewhere thereabouts.  
 25 I also recall -- I recall hearing that there

Page 57

1 might -- he might publish something about us, and I  
 2 went I believe on his website and looked and did not  
 3 find ES -- it was Executive Success Programs, ESP or  
 4 my name at that period.  
 5 Q. Do you remember when that was?  
 6 A. It must have been before whenever the date  
 7 was that the site went up.  
 8 Q. Did you ever have any discussions with  
 9 Michael Sutton about the possibility of retaining  
 10 an independent expert to evaluate NXIVM?  
 11 A. I think I had suggested that that would be a  
 12 good thing and that I thought it was a good thing.  
 13 Q. When did you suggest that? This was before  
 14 he met -- I'm sorry.  
 15 Did you suggest that before he met with Rick  
 16 Ross?  
 17 A. I don't think so. No, I think this was  
 18 later.  
 19 Q. Do you remember roughly what year?  
 20 A. I imagine it was probably a year after the  
 21 website went off or somewhere -- up or somewhere in  
 22 that.  
 23 Q. So was it a year after the website went up?  
 24 A. You know, I'm not really sure. The  
 25 website -- the lawsuit poses interesting problems,

Page 58

1 ethical issues relating to that so...  
 2 Q. At approximately the time Michael told you he  
 3 was meeting with Rick Ross, did you have any  
 4 discussions with him about retaining an expert to  
 5 evaluate NXIVM?  
 6 A. All right. I -- I do remember speaking to  
 7 Michael Sutton -- it might have been right after the  
 8 intervention or I'm not sure of the timing -- asking  
 9 who Rick Ross suggested would be people who could  
 10 give other opinions, second opinions.  
 11 Q. Okay, and what did Michael say?  
 12 A. I think he said he would ask.  
 13 Q. Did you ever hear anything further about the  
 14 names of people who might evaluate NXIVM?  
 15 A. I remem -- I don't know the names, but I  
 16 remember that I believe Michael was given a number  
 17 of names.  
 18 Q. Did you check on any of the names?  
 19 A. No.  
 20 Q. Were you familiar with any of the names?  
 21 A. I wouldn't be.  
 22 Q. Do you know if anyone from NXIVM checked on  
 23 any of the names?  
 24 A. No, I don't know.  
 25 Q. What happened? Do you know if Michael

Page 59

1 approved any of the names?  
 2 A. Approved for what?  
 3 Q. Did Michael -- strike that.  
 4 Did NXIVM indicate that it would be  
 5 comfortable having any of the people named by  
 6 Ross evaluate the program?  
 7 A. I don't -- I don't think it was either way.  
 8 I don't know. I don't remember.  
 9 Q. What happened -- did anything happen after  
 10 Michael gave NXIVM the list of names that he had  
 11 gotten from Ross?  
 12 A. I don't know. I don't know what happened.  
 13 Q. You mentioned that there were ethical issues  
 14 or problems relating to the website after the  
 15 litigation was filed. Can you elaborate?  
 16 A. Yes. The question is if Ross is malintended  
 17 or not. If Ross is malintended, then there are  
 18 certain procedures or -- I shouldn't say  
 19 procedures -- strategies that are best used. If  
 20 someone is not -- if a person is not malintended,  
 21 then there are a different set of strategies.  
 22 The malintended person is not a seeker of  
 23 truth. The malintender seeks to destroy. So if you  
 24 give someone with bad intent information, they're  
 25 not looking to take that information and see what's

Page 60

1 true. They're looking to hurt you. The difference  
 2 between a skeptic and a cynic I -- I say, you know,  
 3 a skeptic is someone who looks to turn magic into  
 4 science. A cynic is someone who looks to turn good  
 5 to bad.  
 6 So if you hope to go into any sort of a  
 7 dialogue with someone who is malintended, it best  
 8 suits you not to give information. If someone's not  
 9 malintended, then it suits you to give information.  
 10 Q. Were these considerations that you had before  
 11 or after the filing of the lawsuit?  
 12 A. These are considerations in general in any  
 13 sort of a human interaction like that.  
 14 Q. Is this something you thought -- you  
 15 considered with respect to Ross before the lawsuit  
 16 was filed?  
 17 A. I'm not sure.  
 18 Q. Did you --  
 19 A. I mean --  
 20 Q. Have you come to the conclusion that Ross is  
 21 malintended?  
 22 A. Not specifically.  
 23 Q. Okay. Have you come to any conclusion about  
 24 Morris and Rochelle Sutton, as to whether they're  
 25 malintended?

1 A. No, not specifically. I don't know in both  
2 cases.  
3 Q. Okay. Have you had any consideration of --  
4 A. I'm sorry. I said or in all three, 'cause  
5 he mentioned three people, but I took them as two  
6 parties.  
7 Q. Has there been any consideration by you of  
8 allowing Ross to have someone evaluate the course  
9 now?  
10 A. It's always a consideration.  
11 Q. Have you discussed this with anyone not --  
12 not your attorneys, but anyone within NXIVM?  
13 A. I think that's always an option. That's  
14 always -- if people ask my opinion on things, that  
15 is so. If they believe that Ross is malintended, it  
16 would be a bad idea.  
17 Q. Have you discussed with Nancy Salzman whether  
18 she thinks he's malintended?  
19 A. No.  
20 Q. Okay. You said at some point you learned  
21 about the Hochman and Martin articles. You were  
22 told that by perhaps several people.  
23 What did you do after you were told about the  
24 Hochman and Martin articles?  
25 A. I read them.

1 piles of paper that are sort of useful past scrap  
2 paper. They may be in there.  
3 Q. Where do you -- where do you keep these  
4 files?  
5 A. Well, there are some files in the house.  
6 There are some other people who have had files  
7 collected, things of mine that I don't know where  
8 they are.  
9 Q. Has anyone asked you for these files during  
10 the course of this litigation?  
11 A. I don't think so, although I did look for  
12 papers that were related to the thing and did not  
13 find any.  
14 Q. Where did you look?  
15 A. I looked in my house. I looked through my  
16 piles.  
17 Q. Did Kristin Keeffe ever ask you to look for  
18 documents relating to this lawsuit?  
19 A. I think she asked me if I knew if certain  
20 ones existed.  
21 Q. What documents did she ask you about?  
22 A. She asked me about e-mail accounts that I  
23 might have.  
24 Q. And were you able to locate documents  
25 relating to e-mail accounts?

1 Q. Did you get them from the website?  
2 A. I think I did. I'm not positive.  
3 Q. Do you remember -- do you own a computer?  
4 A. Yes.  
5 Q. Is this a computer at NXIVM's offices, or is  
6 it at your home?  
7 A. No. It's at home.  
8 Q. Okay. Did you print out the articles?  
9 A. At some point, I did; not when I initially  
10 read them. I later printed them out over the years.  
11 Q. Have you -- did you make any notes on the  
12 articles?  
13 A. I have made notes, yeah.  
14 Q. Have you -- do you remember when you made  
15 notes?  
16 A. Not specifically. There were a few  
17 occasions.  
18 Q. Was it before or after the filing of the  
19 lawsuit?  
20 A. I believe it was after.  
21 Q. Have you retained those notes?  
22 A. I -- I assume that they are somewhere. Most  
23 of the things that I write on are retained. I have  
24 them in boxes sometimes in storage areas, sometimes  
25 -- sometimes other people retain them. I have some

1 A. No.  
2 Q. Did she ask you to look through your files  
3 for anything relating to this matter?  
4 A. She asked me -- she asked me about e-mail. I  
5 think she asked me if I had any notes relating to  
6 the Hochman reports and the Paul Martin reports,  
7 which I did not find any 'cause I did look for them,  
8 but I don't remember her asking specifically.  
9 Q. Okay. Do you recall what your notes on the  
10 Hochman and Martin articles stated?  
11 A. Yeah. The -- not so much the Martin article.  
12 The Hochman article has a number of logical  
13 inconsistencies and a number of factual  
14 inconsistencies. I think there are something like  
15 in the two-page article I think there are 20 or  
16 something like that factual inconsistencies and over  
17 80 logical inconsistencies.  
18 Q. Did you ever -- did you ever give your notes  
19 to an attorney?  
20 A. I'm not sure. There was one point where one  
21 of the attorney firms wanted me to analyze the  
22 articles, and I said that I would like to see their  
23 analysis first; and I did not end up analyzing the  
24 article for them. I do have, you know, thoughts on  
25 it but...



1 Q. Do you remember which firm that was?  
 2 A. Proskauer, I believe.  
 3 Q. Do you believe you gave Proskauer any  
 4 documents relating to the articles?  
 5 A. I don't know if in the end I did. It -- I  
 6 may well have, but originally I wanted them to do  
 7 it first; and I wanted to see what they thought  
 8 because I'm -- I'm a logic person. I know facts  
 9 relating to NXIVM, but I'm not a legal person, and  
 10 my analysis of the article is highly tedious.  
 11 Q. Do you recall what you gave to Proskauer?  
 12 A. If I gave anything -- and I don't recall,  
 13 per se -- I probably would have given just the Word  
 14 documents of each of the sentences and the analysis  
 15 and the logical flow and stuff like that.  
 16 Q. And do you remember who at Proskauer you  
 17 would have given that to?  
 18 A. No, I --  
 19 MR. McGUIRE: Object to the form.  
 20 Q. If you gave the documents, do you know who at  
 21 Proskauer you would have given them to?  
 22 A. No. I wasn't a client of Proskauer's. I  
 23 ultimately would have given them to either Nancy or  
 24 to Kristin or someone like that, and they would have  
 25 given them to Proskauer.

1 A. Yes.  
 2 Q. -- is that your signature?  
 3 A. It appears to be. That's what I just  
 4 checked.  
 5 Q. Did you review -- did you draft this  
 6 document?  
 7 A. I don't believe I drafted it, but I certainly  
 8 if I signed it looked at it and approved it.  
 9 Q. Okay. Was this drafted by one of your  
 10 attorneys?  
 11 A. I'm not sure.  
 12 Q. Okay, but you're certain you looked at it to  
 13 make sure it was accurate?  
 14 A. Yes.  
 15 Q. Okay. Did you have any changes to what you  
 16 were presented by your attorneys?  
 17 A. I don't know. I sometimes do.  
 18 Q. Okay. Do you recall whether you did in this  
 19 situation?  
 20 A. No, I don't know.  
 21 Q. Okay. Turning to Paragraph 2 of your  
 22 Affidavit, which is actually on the first page, it  
 23 contains the sentence, "Rick Ross was hired to  
 24 discredit us and by using a series of false facts  
 25 has created an avalanche of false bad press."

1 Q. I'm sorry. You had said you were not a  
 2 client of Proskauer?  
 3 A. Of Proskauer's, right.  
 4 Q. Did you meet with Proskauer on any occasions?  
 5 A. I was introduced to attorneys from Proskauer.  
 6 Q. Did you discuss the substance of the case  
 7 with them?  
 8 A. No.  
 9 MR. KOFMAN: Okay. I'd like to -- would  
 10 you please mark this as Raniere-2.  
 11 (Affidavit of Keith Raniere signed  
 12 8/18/03 consisting of six pages was received and  
 13 marked Defendant's Exhibit Raniere-2 for  
 14 Identification.)  
 15 BY MR. KOFMAN:  
 16 Q. Mr. Raniere, I'd like you to take a look at  
 17 a document that's been marked as Raniere-2 entitled  
 18 Affidavit.  
 19 Please take a look at that.  
 20 A. Okay.  
 21 (Witness complies.)  
 22 Q. Do you recognize that document?  
 23 A. It looks like my Affidavit. Hold on.  
 24 Q. Turning to the last page of this, which is  
 25 Page 6 --

1 Who did you -- when you say, "Rick Ross was  
 2 hired to discredit us," what was your understanding  
 3 as to who hired Rick Ross?  
 4 A. I think it was Moe Sutton.  
 5 Q. Moe Sutton?  
 6 A. I believe so.  
 7 Q. What's the basis for your contention that  
 8 Morris Sutton hired Rick Ross to discredit -- strike  
 9 that.  
 10 When you say "us," to whom are you referring?  
 11 A. NXIVM -- what is now NXIVM, what is ESP,  
 12 myself, Nancy Salzman, whoever was discredited.  
 13 Q. Okay. What's the basis for your statement  
 14 that Moe Sutton hired Ross to discredit you?  
 15 A. Because that's what I was told. I was told  
 16 that he hired Ross; and I was told that Moe Sutton  
 17 wanted to take Michael, if you will, the phrasing I  
 18 think is away from NXIVM, wanted Michael to be in  
 19 his family business, did not want certain family  
 20 secrets revealed and because Michael wanted to  
 21 reveal those things wanted to discredit us.  
 22 Q. Who told you all those things?  
 23 A. I believe Michael did.  
 24 Q. But was your source for this statement that  
 25 "Rick Ross was hired to discredit us" anybody

1 besides Michael?  
 2 Did you have another source for that besides  
 3 what Michael told you?  
 4 A. I -- I don't think so because I don't know  
 5 anyone else who would have firsthand knowledge.  
 6 Q. Did Michael Sutton tell you what the basis  
 7 of his understanding of why Rick Ross was hired?  
 8 A. I believe he did.  
 9 Q. Do you recall him telling you?  
 10 A. I recall over a period of several  
 11 conversations him saying a number of things, yes.  
 12 Q. And was that all prior to August 18, 2003,  
 13 the date of this Certification?  
 14 A. I don't know if it was all prior, but there  
 15 must have been sufficient prior. Otherwise, I  
 16 wouldn't have signed this.  
 17 Q. So what specifically did Michael tell you  
 18 about why his family -- why -- strike that.  
 19 Did Michael indicate that Rochelle Sutton had  
 20 hired Ross to discredit you?  
 21 A. No. I believe -- and when you say "hired,"  
 22 there's a difference I think between the person who  
 23 pays and the person who hires. It was Michael's  
 24 strong impression because of what was going on with  
 25 their family that his father hired Rick Ross.

1 A. No, I don't remember.  
 2 Q. Do you have any knowledge one way or the  
 3 other as to whether Stephanie Franco was responsible  
 4 for the hiring of Rick Ross?  
 5 A. No, I don't know.  
 6 Q. Okay. What did he tell -- what did then  
 7 Michael tell you about the reasons that he  
 8 understood Morris Sutton had hired Rick Ross?  
 9 A. This is confidential, yes?  
 10 Q. Yes.  
 11 A. Michael Sutton has a child out of wedlock.  
 12 In his community, there is a rule I guess that if  
 13 you have a child out of wedlock you must shun them  
 14 and shun the woman that you had the child with.  
 15 He originally came to NXIVM because this  
 16 was a conflict in his life. And when he decided to  
 17 support that child, he told me that -- things like  
 18 he didn't want to be walking in the city and have  
 19 his little girl come up to him and have to ignore  
 20 her so he -- he said that his father was very upset.  
 21 He told his father that he wanted to embrace  
 22 his child. His father told him that he would, from  
 23 what I understand, disown him. And I even think in  
 24 the end he was pushed or strongly inspired to be out  
 25 of the family business.

1 Q. Okay, and who do you understood paid  
 2 Rick Ross?  
 3 A. I don't know.  
 4 Q. Okay. Did Michael indicate to you at all  
 5 that Rochelle Sutton had hired Rick Ross?  
 6 A. No.  
 7 Q. Did he say anything to you about his mother  
 8 -- at all about his mother during these  
 9 conversations?  
 10 A. It wasn't the main focus.  
 11 Q. Did he --  
 12 A. I think he --  
 13 Q. Strike that.  
 14 Did he mention her at all?  
 15 A. Probably.  
 16 Q. Do you recall one way or the other?  
 17 A. No. I know that he has I think in his mind a  
 18 stronger relationship with his mother than with his  
 19 father; so he has spoken of going to lunch with his  
 20 mother over the years, things like that.  
 21 I don't remember if he specifically spoke of  
 22 his mother back then.  
 23 Q. Okay, but did he indicate whether Stephanie  
 24 Franco had hired -- had been responsible for hiring  
 25 Rick Ross?

1 It is my understanding he was considered a  
 2 most eligible bachelor within their community and  
 3 that this was disgraceful, and it is my  
 4 understanding that the father would do anything to  
 5 uphold their family position within this community  
 6 and that we were seen as an obstruction to this.  
 7 Q. Did -- and this is what Michael told you over  
 8 the series of several conversations?  
 9 A. Yeah. It's been -- at times, I have met his  
 10 -- the mother of his child. He's asked me questions  
 11 about his child and his relationship and things like  
 12 that as a friend.  
 13 Q. How did the subject of why his parents --  
 14 of why Morris Sutton hired Rick Ross come up?  
 15 Who raised it, you or Michael?  
 16 A. I think probably Michael.  
 17 Q. Where did you have these -- this discussion?  
 18 A. I don't know. I mean, there are numerous  
 19 places I have spoken with Michael.  
 20 Q. Was anybody else present at any of these  
 21 conversations?  
 22 A. Over the years, there have been other people  
 23 present. I don't know if during this time period  
 24 there was anyone present.  
 25 Q. Who else has been present during these

Page 73

1 conversations?  
 2 A. Kristin has been present, Nancy has been  
 3 present, Tom Sarzen has been present. I think there  
 4 have been a few others.  
 5 Q. Did Michael -- so I'm trying to focus. What  
 6 did Michael specifically say about why Morris hired  
 7 Rick Ross?  
 8 A. I -- I had heard originally that Morris hired  
 9 Rick Ross to destroy us were the words. I have  
 10 heard recently that that is stronger than Michael  
 11 believes.  
 12 Q. When you say you had heard that Michael had  
 13 hired --  
 14 A. Moe.  
 15 Q. -- Rick Ross to destroy you, from who did you  
 16 hear that?  
 17 A. I meant Moe. If I said Michael, I meant Moe.  
 18 Q. Strike that.  
 19 From who did you hear that Michael had hired  
 20 -- that Morris Sutton had hired Rick Ross to destroy  
 21 you?  
 22 A. I believe Michael. Now, I --  
 23 Q. Did he?  
 24 A. Now, I did see recently that Michael or hear  
 25 recently that Michael does not use that strong of a

Page 74

1 word. So although my recollection might be that,  
 2 I'm open to the fact that maybe it would be more  
 3 Moe Sutton would do anything in his power to get  
 4 Michael back, even if it meant destroying us.  
 5 Q. Okay. Did Michael use the word "destroy" in  
 6 your con -- "destroy" NXIVM in your conversations in  
 7 2003?  
 8 A. To the best of my recollection.  
 9 Q. Did he use the word "discredit"?  
 10 A. I think, yes. I am pretty sure. I'm more  
 11 sure of "discredit" than "destroy."  
 12 Q. Uh-huh.  
 13 A. Michael told me that Moe Sutton is a very  
 14 powerful man, the type of man that has senators  
 15 over for dinner I believe is what the phrase was.  
 16 Q. Did Michael indicate back in 2003 that his  
 17 father was concerned about his involvement with  
 18 NXIVM?  
 19 A. Yes. I would consider saying what I remember  
 20 him saying expressing concern.  
 21 Q. Did Michael indicate that the -- in 2003 that  
 22 the reason his father had hired Rick Ross was to get  
 23 him to separate from NXIVM?  
 24 A. I believe that was the gist of the  
 25 conversation.

Page 75

1 Q. Did he indicate anything about -- strike  
 2 that.  
 3 Did he indicate how Morris Sutton's -- strike  
 4 that.  
 5 Did he indicate why he believed Morris Sutton  
 6 would try to destroy or discredit NXIVM? Strike  
 7 that. Let me rephrase the question.  
 8 Did he indicate what the source of his  
 9 understanding of Morris Sutton's intent was?  
 10 A. I believe social embarrassment.  
 11 Q. Did he --  
 12 A. That is my opinion.  
 13 Q. Did he indicate that Morris Sutton had told  
 14 him that he wanted to destroy or discredit NXIVM?  
 15 A. I believe so.  
 16 Q. Okay. Did he quote his father?  
 17 A. I believe so.  
 18 Q. You didn't take any notes of any of these  
 19 conversations, did you?  
 20 A. No.  
 21 Q. If you had to draft this same sentence today,  
 22 would you change anything?  
 23 A. Which one?  
 24 Q. The one that said, "Rick Ross was hired to  
 25 discredit us."

Page 76

1 A. I still believe in what Michael told; and  
 2 also with some of the additional language that Rick  
 3 Ross has used on his site, I would fortify this, so  
 4 I do believe that Rick Ross was hired to discredit  
 5 us.  
 6 I might add because of what I have heard  
 7 recently that it is my opinion because there is some  
 8 conflict as to whether Moe Sutton said, "I will  
 9 destroy NXIVM" or "I will do anything in my power to  
 10 get you back, even if it means destroying NXIVM"  
 11 so...  
 12 Q. Have you read -- are you aware that Michael  
 13 Sutton was deposed in this case?  
 14 A. Yes.  
 15 Q. Have you read the transcript of his  
 16 deposition?  
 17 A. No.  
 18 Q. Is it your contention that Morris Sutton is  
 19 responsible for the content of Rick Ross' website as  
 20 it pertains to NXIVM?  
 21 MR. McGUIRE: Object to the form of that  
 22 question. It calls for a legal conclusion.  
 23 A. Can you please define what you mean by  
 24 "responsible"?  
 25 Q. Is it your understanding that Morris Sutton

1 has been involved in selecting the content or what  
 2 is posted on Rick Ross' website about NXIVM?  
 3 A. I can only offer my opinion. I don't believe  
 4 that Moe Sutton selects everything that is on Rick  
 5 Ross' website related to NXIVM. I don't know what  
 6 his involvement is.  
 7 Q. Do you understand -- do you have any  
 8 understanding as to whether Morris Sutton has  
 9 selected anything for placement on Rick Ross'  
 10 website?  
 11 A. I'm not sure.  
 12 Q. Do you have any understanding as to whether  
 13 Morris Sutton has any control over what Rick Ross  
 14 puts on his website?  
 15 A. My assumption is that he doesn't have full  
 16 control of what Rick Ross puts on his website.  
 17 Q. You said "full control."  
 18 Do you have any understanding as to whether  
 19 he has any control?  
 20 A. I don't know. I don't know what the relation  
 21 -- the full relationship is between Rick Ross and  
 22 Moe Sutton.  
 23 Q. So a little while ago you said that based on  
 24 what appears on the website you could make certain  
 25 conclusions about what Morris Sutton's intent was.

1 had an Affidavit somehow prepared and that there  
 2 was something that needed to be changed because he  
 3 didn't agree with it relating to this issue.  
 4 Q. Do you know when that was?  
 5 A. No.  
 6 MR. SYLVESTER: What do you guys want to  
 7 do about lunch breaks?  
 8 MR. CAMPION: Why don't we break at  
 9 12:30.  
 10 MR. KOFMAN: What time is it now?  
 11 MR. CAMPION: Twenty after.  
 12 MR. KOFMAN: Give me about five minutes  
 13 and then we'll break.  
 14 MR. CAMPION: Sure, okay.  
 15 (A discussion was held off the record.)  
 16  
 17 BY MR. KOFMAN:  
 18 Q. Mr. Raniere, you mentioned that you were  
 19 asked to search for e-mail accounts.  
 20 What e-mail accounts have you maintained  
 21 since 2001?  
 22 A. Maintained all the way through?  
 23 Q. Strike that.  
 24 What e-mail accounts have you had access to  
 25 and used?

1 How can you make an assumption about Morris  
 2 Sutton's intent based on the website if you don't  
 3 know what role Morris Sutton has with respect to the  
 4 website?  
 5 A. I -- I don't remember saying that.  
 6 Could you please repeat what I said so I can  
 7 comment on it?  
 8 Q. Well, the transcript will be clear but do you  
 9 -- that's fine. We can move on.  
 10 When you say that you understand now that  
 11 Michael Sutton's words have changed, is that based  
 12 on conversations you've had with Michael?  
 13 MR. CAMPION: I object to the form of  
 14 that question.  
 15 Go ahead and answer it.  
 16 A. I'm not sure completely.  
 17 Q. Do you have any -- strike that.  
 18 Has Michael Sutton indicated to you that his  
 19 perception has changed about why Morris Sutton hired  
 20 Rick Ross?  
 21 A. No.  
 22 Q. Is this something you've heard from third --  
 23 from someone other than Morris -- than Michael  
 24 Sutton?  
 25 A. I heard that Michael Sutton had signed or

1 A. There's the Kunterre@nycap.rr.com, which I  
 2 have a shared access to. There were one or two  
 3 Yahoo accounts. I think there was one that was  
 4 Honor and Ethics. There is a current account that  
 5 has been created recently, which is there's a -- I  
 6 have a Facebook account and a Yahoo account which is  
 7 my name. I believe there was a Yahoo account,  
 8 Vanguard 2000 that someone created for me, and I  
 9 don't know if I can get e-mail on the NXIVM server.  
 10 I believe that I can, although I don't recall  
 11 getting any e-mail at Vanguard@NXIVM.com.  
 12 Q. Have you -- at any time since the litigation  
 13 was filed, have you searched these e-mail accounts  
 14 to locate any documents relevant to this litigation?  
 15 A. Yes.  
 16 Q. When did you perform that search?  
 17 A. The last time or --  
 18 Q. The first time.  
 19 A. 'Cause there were a few times.  
 20 Q. The first time.  
 21 A. The first time, I don't remember. It was a  
 22 discovery request a bit back. I think it was  
 23 Kristin that asked me.  
 24 Q. And did you locate anything at that time?  
 25 A. No.

1 Q. Okay. Have you searched since then?  
 2 A. Yes.  
 3 Q. In response to other discovery requests?  
 4 A. Or the same one. I'm not sure.  
 5 Q. Have you located any documents from your  
 6 e-mail accounts?  
 7 A. No.  
 8 Q. From any of these e-mail accounts?  
 9 A. I have to say there have been several  
 10 computers in between. The NXIVM -- the Nycap server  
 11 and also -- the Nycap server is different than, say,  
 12 the Yahoo server. The Yahoo server keeps your mail  
 13 on the server, and you can access it from anyplace  
 14 whereas the Nycap server downloads to the specific  
 15 computer and does not retain any of the e-mails, so  
 16 I have limitations. The last time I searched my  
 17 computers, which was at the request of my attorneys,  
 18 I was only able to search back a few months.  
 19 MR. KOFMAN: Let's take a break now.  
 20 MR. CAMPION: Sure.  
 21 MR. KOFMAN: Thank you.  
 22  
 23 (Witness excused.)  
 24 (At this point, the luncheon recess was  
 25 taken.)

1 A. No.  
 2 Q. Have you ever attended any meetings or  
 3 sessions of Scien -- the Church of Scientology?  
 4 A. I'm not sure if you'd call it a meeting or a  
 5 session. I have a number of friends who are  
 6 Scientologists.  
 7 Q. Have you ever attended any events sponsored  
 8 by the Church of Scientology?  
 9 A. No, not that I know of.  
 10 Q. Okay. Did you have friends who were members  
 11 of the Church of Scientology prior to 1998?  
 12 A. Prior to 1998, yes, I think so.  
 13 Q. Okay. Have you ever discussed with them the  
 14 tenets of Scientology?  
 15 A. Not in detail, philosophically.  
 16 Q. Have you ever reviewed any Scientology  
 17 materials?  
 18 A. Yes.  
 19 Q. What type of mat -- what materials?  
 20 A. I have this book. Dianetics is what they  
 21 call it. I started reading that.  
 22 Q. Did you read that before 1998?  
 23 A. I'm not sure. I think so.  
 24 Q. Okay. Mr. Ranieri, what's the Rational  
 25 Inquiry Method in general terms?

1 AFTERNOON SESSION  
 2  
 3 THE VIDEOGRAPHER: This is the beginning  
 4 of Tape Number 3. We're on.  
 5 MR. KOFMAN: What's the time?  
 6 THE VIDEOGRAPHER: 2:51.  
 7  
 8 KEITH ALAN RANIERE, previously  
 9 sworn, resumed the stand and testifies on his oath  
 10 as follows:  
 11  
 12 CONTINUED DIRECT EXAMINATION BY MR. KOFMAN:  
 13 Q. Back on the record, Mr. Ranieri. Have you  
 14 ever heard of something called neuro linguistic  
 15 programming?  
 16 A. Yes.  
 17 Q. Have you ever taken any classes in  
 18 neurolinguistic programming?  
 19 A. Yes.  
 20 Q. When did you take those classes?  
 21 A. Long ago, early -- mid-'80s maybe, something  
 22 like that. I took one class.  
 23 Q. Okay. How long was the class, if you recall?  
 24 A. No.  
 25 Q. Did you get any materials from the class?

1 A. It's a mathematical method of analyzing data;  
 2 any human discipline, athletics, the arts, whatever.  
 3 Q. Is the Rational Inquiry Method what is taught  
 4 by NXIVM in its Intensives?  
 5 A. I would say some of the Rational Inquiry. Is  
 6 the method itself taught in the Intensives? I would  
 7 say results of the method are taught in the  
 8 Intensive.  
 9 Q. Do the materials that NXIVM provides to  
 10 students at Intensives, are those part of the  
 11 Rational Inquiry Method?  
 12 A. I think some are, some aren't.  
 13 Q. What parts of the materials are part of the  
 14 Rational Inquiry Method?  
 15 A. I think it's important to distinguish the  
 16 Rational Inquiry Method as a tool and then the  
 17 results of what that tool does.  
 18 Do you consider the results of what that tool  
 19 does part of the method?  
 20 Q. What do you define as the method?  
 21 A. I would say the theoretical procedure and  
 22 procedures involved in the creation of certain  
 23 results. I look at the Rational Inquiry Method as a  
 24 tool.  
 25 Q. Okay, and the results are what is taught in

Page 85

1 NXIVM Intensives?  
 2 A. Some of them.  
 3 Q. What would you characterize as the results  
 4 that are taught in the Rational Inquiry -- in NXIVM  
 5 Intensives?  
 6 A. A specific ordering of questions, a specific  
 7 ordering of philosophical concepts; things like  
 8 that.  
 9 Q. So is it my understanding that NXIVM  
 10 Intensives do not teach the full Rational Inquiry  
 11 Method?  
 12 A. In other words, do all of the Intensives  
 13 together teach all of Rational Inquiry, no.  
 14 Q. Are there any courses that -- available that  
 15 teach the entire Rational Inquiry Method?  
 16 A. I wouldn't say the entire method as it exists  
 17 today.  
 18 Q. Are you the sole author of the Rational  
 19 Inquiry Method?  
 20 A. I am the sole creator of it.  
 21 When you say "author," what do you mean?  
 22 Q. Did you develop the Rational Inquiry Method?  
 23 A. Yes.  
 24 Q. Did anyone assist you in developing it?  
 25 A. Can you be specific about "assist"?

Page 86

1 Q. Did anyone work with you in developing the  
 2 Rational Inquiry Method?  
 3 A. To some degree.  
 4 Q. Who?  
 5 A. Nancy to some degree.  
 6 Q. Did you consult with any source materials  
 7 when you created the Rational -- when you and with  
 8 the assistance of Ms. Salzman created the Rational  
 9 Inquiry Method?  
 10 A. No, not that I know of.  
 11 Q. Were there any books that you referenced?  
 12 A. I mean, there are a lot of different things  
 13 that I reference.  
 14 Q. Any books that you consulted in the draft --  
 15 in the creation of the method?  
 16 A. I guess I'm not understanding in full.  
 17 How would that look?  
 18 Q. When you drafted the method or committed pen  
 19 to paper, were there any -- did you make use of any  
 20 books?  
 21 A. I did -- you're assuming I put pen to paper  
 22 to do the method. There is a patent related to the  
 23 Rational Inquiry Method. There are products from  
 24 the Rational Inquiry Method that are in writing.  
 25 There are teaching methodologies that aren't

Page 87

1 written. The whole Rational Inquiry Method is not  
 2 committed to writing.  
 3 Q. Okay.  
 4 A. And in the patent, I mean, there is like a --  
 5 all the related works type of things.  
 6 MR. SKOLNIK: Can I get that last answer  
 7 back.  
 8 THE WITNESS: In the patent -- oh, I'm  
 9 sorry.  
 10 (The following was read back by the  
 11 reporter:  
 12 "I did -- you're assuming I put pen to  
 13 paper to do the method. There is a patent related  
 14 to the Rational Inquiry Method. There are products  
 15 from the Rational Inquiry Method that are in  
 16 writing. There are teaching methodologies that  
 17 aren't written. The whole Rational Inquiry Method  
 18 is not committed to writing.  
 19 QUESTION: Okay.  
 20 ANSWER: And in the patent, I mean,  
 21 there is like a -- all the related works type of  
 22 things.")  
 23 BY MR. KOFMAN:  
 24 Q. What source materials did you use to create  
 25 the Rational Inquiry Method?

Page 88

1 A. None specific that I can think of.  
 2 Q. Did you incorporate anything from  
 3 neurolinguistic programming into the Rational  
 4 Inquiry Method?  
 5 A. No, I don't think so.  
 6 Q. How about from the Church of Scientology?  
 7 A. I don't believe so.  
 8 Q. Is the term "suppressive" something that's  
 9 used in the Rational Inquiry Method?  
 10 A. I don't know if that's part of the method.  
 11 That's a label used for a certain type of behavior  
 12 pattern.  
 13 Q. And what is the label? What behavior pattern  
 14 is it used for?  
 15 A. Someone that is acting out of a type of  
 16 emotion that is negative.  
 17 Q. Okay. Do you have an understanding one way  
 18 or the other as to whether the term "suppressive" is  
 19 used by Scientology?  
 20 A. I think they use something similar. I was  
 21 told they have something called suppressive person.  
 22 I don't find them similar in my conversations with a  
 23 friend that knows about that.  
 24 Q. When did you learn that Scientology used  
 25 something called suppressive person?

1 A. I'm not sure. It might have been out of the  
 2 book Dianetics -- I didn't read that much of that  
 3 book -- or it might have been from one of my  
 4 friends.  
 5 Q. Okay. Do you remember the name of the friend  
 6 who talked to you about suppressive persons?  
 7 A. Well, the name that -- the person that comes  
 8 to mind is Sean Bergeron.  
 9 Q. Okay. Is he also a member -- is he also a  
 10 student at NXIVM?  
 11 A. Yes.  
 12 Q. Did you consult any of the works of Ayn Rand  
 13 when you were developing Rational Inquiry Method?  
 14 A. I wouldn't call them "consult." I greatly  
 15 appreciate Ayn Rand's works, what I've read of them.  
 16 Q. Did you incorporate any of her philosophy  
 17 into Rational Inquiry Method?  
 18 A. Not in the method, but some of the patterns  
 19 within her philosophy -- some of the things within  
 20 her philosophy I think are very good.  
 21 Q. And were they incorporated into the materials  
 22 that NXIVM provides?  
 23 A. Yes.  
 24 Q. Can you give some example?  
 25 A. I can only think of one primarily.

1 A. Yes, if I'm -- I'm speaking as a lay person.  
 2 Q. Okay. What was -- what's the status of that  
 3 patent application?  
 4 A. I believe it's pending.  
 5 Q. When did you file -- first file an  
 6 application for the Rational Inquiry Method, a  
 7 patent application?  
 8 A. I'm guessing, 1999-2000, somewhere in there.  
 9 Q. When was the last time any action was taken  
 10 by the Patent Office?  
 11 A. I'm not sure.  
 12 Q. Are you aware as to whether the Patent Office  
 13 has expressed any opinions as to whether or not it  
 14 will issue a patent?  
 15 A. Well, there have been ongoing back and forth  
 16 with it.  
 17 THE WITNESS: Am I -- I don't know.  
 18 Does this -- I don't want to do anything that goes  
 19 against attorney-client privilege with my --  
 20 MR. CAMPION: To the extent there are  
 21 public pronouncements by the patent office, counsel  
 22 is inquiring certainly about that.  
 23 MR. KOFMAN: Yes.  
 24 A. I don't know if they're public or not. My  
 25 understanding is it's an ongoing thing.

1 Q. What's that?  
 2 A. Certain things within the Money module are a  
 3 tribute to her work.  
 4 Q. I'm sorry. You said a tribute to her work?  
 5 A. To her work.  
 6 Q. Is she cited in the Money module?  
 7 A. At one time, she was. I don't know if that's  
 8 the case now.  
 9 Q. Do you have any documents -- strike that.  
 10 Did you create any documents when you were  
 11 developing the Rational Inquiry Method?  
 12 A. Can you be more specific?  
 13 Q. Are there any -- did you take notes or when  
 14 you were -- or have any drafts of materials that  
 15 were incorporated into the Rational Inquiry Method?  
 16 A. I apologize. Understand, I believe the  
 17 Rational Inquiry Method was developed over 30 years.  
 18 You're asking me if I've drafted any materials over  
 19 the past 30 years or have any notes over the past  
 20 30 years, I'm sure I did, but I guess I'm not  
 21 understanding your question other than that.  
 22 Q. Okay. I'm going to move a little bit to  
 23 something related.  
 24 First of all, you mentioned patent. Did you  
 25 apply for a patent for the Rational Inquiry Method?

1 Q. Who is representing you in connection with  
 2 the patent application?  
 3 A. Arlen Olsen.  
 4 Q. And do you know when the last time the Patent  
 5 Office contacted Mr. Olsen about your application?  
 6 MR. CAMPION: You can answer that.  
 7 A. No.  
 8 Q. Did the -- do you have a recollection that  
 9 in 2004 the Patent Office issued what it termed was  
 10 a final denial of the patent application for  
 11 Rational Inquiry Method?  
 12 A. I am --  
 13 THE WITNESS: How much can I say without  
 14 violating attorney-client privilege?  
 15 MR. CAMPION: Okay. If I understand the  
 16 question correctly, you're asking whether the  
 17 witness is familiar with some document that came  
 18 from the Patent Office?  
 19 MR. KOFMAN: Correct.  
 20 MR. CAMPION: All right. Why don't you  
 21 show him the document and inquire that way.  
 22 THE WITNESS: Would it be helpful if we  
 23 took a break and I told you what I know, and then  
 24 you can decide the best way so I can give him the  
 25 information?

Page 93

1 MR. CAMPION: Counsel, what's your  
 2 position on that?  
 3 MR. KOFMAN: I think I'd rather show him  
 4 the documents and --  
 5 THE WITNESS: Okay.  
 6 MR. KOFMAN: Please mark this as  
 7 Raniere-3.  
 8 (United States Patent and Trademark  
 9 Office documents Bates stamped P00000209 through  
 10 231 were received and marked Defendant's Exhibit  
 11 Raniere-3 for Identification.)  
 12 MR. KOFMAN: For the record, Raniere-3  
 13 is a document that was produced to my firm in  
 14 discovery. It bears Bates stamp numbers P209  
 15 through P231, and it bears a Bates stamp from the  
 16 firm of Schmeiser, Olsen & Watts LLP dated August  
 17 26, 2004.  
 18 BY MR. KOFMAN:  
 19 Q. Have you seen this document before, sir?  
 20 A. I'm not sure. I'm not sure.  
 21 Q. Would looking at the document refresh your  
 22 recollection as to whether you saw it before or not?  
 23 A. No.  
 24 Q. Okay. Do you recall the Patent Office taking  
 25 the position that the Rational Inquiry Method was

Page 94

1 not patentable?  
 2 A. No.  
 3 Q. Do you have any reason to believe your  
 4 attorney didn't share, Mr. Olsen didn't share the  
 5 Patent Office's conclusions with you?  
 6 A. No.  
 7 Q. Did it ever come to your attention -- strike  
 8 that.  
 9 Was part of what you were trying to patent  
 10 the scarves and sashes that NXIVM students wear?  
 11 A. That's one of a series of patents, yes.  
 12 Q. Did it come to your attention that the Patent  
 13 Office had stated that scarves and sashes were not  
 14 patentable as a showing of rank, since the Boy  
 15 Scouts use the same thing?  
 16 A. No.  
 17 Q. Okay. What's the last --  
 18 A. Aren't they patented?  
 19 Q. What's the last information you've heard from  
 20 the Patent Office or you're aware of from the Patent  
 21 Office as to the status of your application for  
 22 Rational Inquiry Method?  
 23 A. It's being examined.  
 24 Q. When was the last time you had a  
 25 communication about the status of the patent?

Page 95

1 A. Rational Inquiry?  
 2 Q. Yes.  
 3 A. When I meet with Arlen, we go through all of  
 4 the -- all of the patents, so I guess within the  
 5 past few months I've met with him.  
 6 Q. Does he copy you on documents that he files  
 7 with the Patent Office?  
 8 A. I think most of the time. I don't read them.  
 9 There are a lot of them.  
 10 Q. How did you come to be called "vanguard"?  
 11 A. You want to know the process?  
 12 Q. Yes.  
 13 A. I had believed that it would be a good idea  
 14 in the school to have titles. I got together with a  
 15 group of people, four or five friends, and we got a  
 16 thesaurus out and went through all the titles that  
 17 could be for the different things, whether it be  
 18 coach, proctor, counselor, prefect, vanguard, as  
 19 they are today. There were a lot of different  
 20 suggestions.  
 21 There were two suggestions that I did not  
 22 want to be called. I did not want to be called  
 23 "master," and although in martial arts they always  
 24 refer to people; Master Pai, Master Fong, I didn't  
 25 want that. I also didn't want to be called anything

Page 96

1 like what they do in the Elks Club, which is Grand  
 2 Exalted Ruler. I thought that was a little extreme.  
 3 I wanted a title that had a functional relationship  
 4 to my role.  
 5 So people put in things. All five people put  
 6 in a bunch of alternatives, and everyone ranked  
 7 them -- I believe it was the top five -- and ranked  
 8 them from one to five, and we added the ranks  
 9 together; and "vanguard" had the highest score. It  
 10 was not my number one choice.  
 11 Q. Does the name derive at all from Ayn Rand or  
 12 Ayn Rand?  
 13 A. No.  
 14 Q. What was your number one choice?  
 15 A. "Founder," I believe.  
 16 Q. Does NXIVM -- do you know if NXIVM presently  
 17 represents that Rational Inquiry Method is patent  
 18 pending?  
 19 A. I believe it is.  
 20 MR. KOFMAN: Mark this, please, as  
 21 Raniere-4.  
 22 THE WITNESS: Are we done with this  
 23 document?  
 24 MR. KOFMAN: We are.  
 25 (Document entitled Assignment Bates



Page 97

1 stamped P000000689 was received and marked  
 2 Defendant's Exhibit Ranieri-4 for Identification.)  
 3 THE WITNESS: I'm about to cough. Is  
 4 that okay?  
 5 THE VIDEOGRAPHER: That's okay.  
 6 THE WITNESS: Sorry.  
 7 BY MR. KOFMAN:  
 8 Q. Mr. Ranieri, the document I'm showing you --  
 9 MR. CAMPION: Let me have the document.  
 10 MR. KOFMAN: Oh, I'm sorry.  
 11 A. Is this for me?  
 12 Q. Yeah. The document I'm showing you, sir,  
 13 which has been marked as Ranieri-4 is a single-page  
 14 document produced in discovery Bates stamped P689.  
 15 Is that your signature at the bottom of the  
 16 document?  
 17 A. It appears to be.  
 18 Q. Was this a document that you signed to assign  
 19 your rights in Rational Inquiry Method to First  
 20 Principles?  
 21 A. I believe so.  
 22 Q. And why did you assign your rights to  
 23 Rational Inquiry Method to First Principles?  
 24 A. So that First Principles could develop,  
 25 ultimately develop curriculum.

Page 98

1 Q. Do you receive any money for Rational Inquiry  
 2 Method from either NXIVM or First Principles?  
 3 A. No.  
 4 Q. Do you receive money for Rational Inquiry  
 5 Method from any source?  
 6 A. No.  
 7 Q. Do you -- are you employed anywhere at  
 8 present?  
 9 A. No.  
 10 Q. Did you -- what was the consideration that  
 11 you gave -- or strike that.  
 12 Did -- what did First Principles pay for the  
 13 assignment of the rights to Rational Inquiry Method?  
 14 A. There's a 10 percent royalty that's supposed  
 15 to go to a foundation to study human potential, and  
 16 an additional condition is they are to develop  
 17 principles -- develop curriculum in a way that does  
 18 not go outside of what I would want with the  
 19 property.  
 20 Q. Okay. When you say they donate 10 percent to  
 21 the foundation, to what foundation are you  
 22 referring?  
 23 A. I don't believe the 10 percent has ever been  
 24 actualized.  
 25 Q. Was your under -- they did -- there was some

Page 99

1 discussion at the time of this assignment that they  
 2 would donate money to a foundation?  
 3 A. There was supposed to be a 10 percent, I  
 4 guess you would call it a donation to a foundation  
 5 to study the method, to study things relating to the  
 6 method.  
 7 Q. What was the name of the foundation that  
 8 was --  
 9 A. It was not specified.  
 10 Q. Okay, and has any money ever been donated to  
 11 a foundation to study the method?  
 12 A. I don't know.  
 13 Q. Do you know why that is?  
 14 A. There has been money donated to a foundation  
 15 to study the method. I don't know if the 10 percent  
 16 has been donated to study the method.  
 17 Q. What's the name of the foundation to which  
 18 the money has been donated?  
 19 A. Oh, what was it called? The Ethical  
 20 Foundation I think is the name.  
 21 Q. Are you an officer or director of the Ethical  
 22 Foundation?  
 23 A. No.  
 24 Q. Are you an employee of the Ethical  
 25 Foundation?

Page 100

1 A. No.  
 2 Q. Do you have any relationship at all with the  
 3 Ethical Foundation?  
 4 A. No.  
 5 Q. Do you know who is an officer and director of  
 6 the Ethical Foundation?  
 7 A. Joe O'Hara was. I don't know who is  
 8 currently.  
 9 Q. Is Ms. Salzman?  
 10 A. I don't know. I --  
 11 Q. Do you know if Ms. Keeffe is?  
 12 A. I don't believe so, but I don't know.  
 13 Q. Have you ever seen any results of the Ethical  
 14 Foundation's study of the method?  
 15 A. I'm not sure if it's the Ethical Foundation  
 16 that did the studies.  
 17 Q. Do you know of any studies that have looked  
 18 at the results of the Eth -- of the Rational Inquiry  
 19 Method?  
 20 A. Yes.  
 21 Q. What's the name -- what studies have been  
 22 done?  
 23 A. There's an ongoing study done with people  
 24 coming in and taking the courses, and after the  
 25 course and a certain number of -- amount of time

Page 101

1 after the course and things like that.  
 2 Q. Who is conducting that study?  
 3 A. His first name is Sheldon.  
 4 Q. Is it Sheldon Solomon?  
 5 A. Yes.  
 6 Q. Have you seen any documents generated by  
 7 Mr. Solomon's study?  
 8 A. I've seen a few.  
 9 MR. KOFMAN: And, Bill, do you know if  
 10 all those documents have been produced in discovery?  
 11 I've seen some, but do you know if all of the  
 12 documents from Mr. Solomon have been produced?  
 13 MR. McGUIRE: As far as I know, but you  
 14 know I wasn't involved at that time.  
 15 MR. KOFMAN: Sure. I'll make -- put a  
 16 request on the record and follow up with a letter  
 17 just to confirm that.  
 18 MR. McGUIRE: Fair enough.  
 19 (Request.)  
 20 Q. Have you personally received any -- strike  
 21 that.  
 22 Is Mr. Solomon employed by NXIVM or First  
 23 Principles?  
 24 A. I don't believe so.  
 25 Q. Is he employed by the Ethical Foundation?

Page 102

1 A. I don't know.  
 2 Q. Has he been hired or as a contractor by the  
 3 Ethical Foundation?  
 4 A. I don't know who or what.  
 5 Q. How do you earn a living, Mr. Raniere?  
 6 A. I have money. I don't earn it in a normal  
 7 sense.  
 8 Q. How do you earn it?  
 9 A. Well, during my day, I teach piano and voice  
 10 and solve problems; but I don't get money for those  
 11 things. I have a certain amount of money, and  
 12 that's how I live.  
 13 Q. Well, are these savings of yours?  
 14 A. Yes.  
 15 Q. Has Ms. Salzman purchased a townhouse on your  
 16 behalf?  
 17 A. No.  
 18 Q. Okay. Do you receive grants from any source?  
 19 A. Not that I know of. Now, I have to say as  
 20 far as purchasing a townhouse, I don't know all the  
 21 purchases either. I would think if it was on my  
 22 behalf I would know it but...  
 23 Q. Do you own the address at which you live?  
 24 A. Yes, half.  
 25 Q. You're a co-owner?

Page 103

1 A. Yes.  
 2 Q. And did you put up money for the purchase?  
 3 A. Originally, yes.  
 4 Q. When was that?  
 5 A. 1987.  
 6 Q. Now, putting aside the Rational Inquiry  
 7 Method, you indicated to me that the curriculum --  
 8 A. Done with this?  
 9 Q. -- that's taught by NXIVM is separate from  
 10 the Rational Inquiry Method.  
 11 Are you the author of the modules that are  
 12 taught at NXIVM?  
 13 A. Can you be specific what you mean by  
 14 "author"?  
 15 Q. Did you -- did you create all of the modules  
 16 that NXIVM teaches?  
 17 A. I created the concep -- concepts and the  
 18 order of the concepts. I did not author the text  
 19 relating to the modules. I did not write it.  
 20 Q. But you -- the concepts were developed --  
 21 that are contained there are developed by you?  
 22 A. Yes.  
 23 Q. Who -- who wrote or took those concepts and  
 24 wrote the modules?  
 25 A. Various people. I don't know all of them.

Page 104

1 Q. Can you give me the names of the people you  
 2 do recall?  
 3 A. Um, I think Nancy might have. I'm not sure.  
 4 I think Ivy Nevarez might have. She does a lot of  
 5 the writing for NXIVM and also authorship. I can't  
 6 think of anyone else.  
 7 Q. Can you explain to me the process by which  
 8 your concepts are translated into the modules or how  
 9 the modules came to be written?  
 10 A. Normally I would sit down with someone like  
 11 Nancy and talk about the module, talk about the  
 12 questions, sometimes give an ordering of the  
 13 questions or at the time talk it through and come  
 14 up with an ordering of the questions; and I'm not  
 15 exactly sure how that gets translated ultimately  
 16 into the module.  
 17 Q. Would you review the modules before they were  
 18 taught to make sure that they accurately reflected  
 19 your concepts?  
 20 A. In the beginning, I did. Now I do not.  
 21 Q. When you say, "In the beginning," to what  
 22 time period are you referring?  
 23 A. The first few months of NXIVM I'd say, first  
 24 three months maybe.  
 25 Q. When was the last time you reviewed a module?

1 A. Reviewed one?  
 2 Q. Yeah -- yes.  
 3 A. I don't know, eight years ago or something;  
 4 a long time ago.  
 5 Q. Are you still -- but are you still involved  
 6 in the process of creating modules?  
 7 A. Yes.  
 8 Q. And do you use the same procedure that you  
 9 just described for me in the creation of a module?  
 10 A. Yes.  
 11 Q. The person who's writing these modules, do  
 12 they work from any notes that you've provided or is  
 13 it discussed orally?  
 14 A. Normally discussed orally. There may have  
 15 been occasions where notes have been provided.  
 16 There are times that during the oral discussion  
 17 notes are created.  
 18 THE WITNESS: If some of this process  
 19 becomes what I think is secret, how should I handle  
 20 this?  
 21 MR. CAMPION: I believe that's covered  
 22 by the confidentiality arrangement which is in place  
 23 agreed to by all parties and counsel at the  
 24 beginning of today's deposition.  
 25 A. Continue.

1 that we keep as a secret, and something that if it  
 2 were not a secret would be a disadvantage to us.  
 3 MR. KOFMAN: I'd like to have this  
 4 marked as Ranieri-5, please.  
 5 (Three-page document entitled A Forensic  
 6 Psychiatrist Evaluates ESP was received and marked  
 7 Defendant's Exhibit Ranieri-5 for Identification.)  
 8 THE WITNESS: Is this -- are we done  
 9 with this?  
 10 MR. KOFMAN: Yes, we are.  
 11 BY MR. KOFMAN:  
 12 Q. The document I'm showing you marked Ranieri-5  
 13 is a three-page document entitled "A Forensic  
 14 Psychiatrist Evaluates ESP," dated February 2003 by  
 15 Dr. -- by John Hochman, M.D.  
 16 Mr. Ranieri, I believe you indicated that you  
 17 read this article previously.  
 18 A. Yes.  
 19 Q. And is this one of the articles that appears  
 20 on the Rick Ross websites?  
 21 A. Yes.  
 22 Q. Does -- is it your understanding that this  
 23 article contains trade secrets belonging to NXIVM?  
 24 A. I'm not particularly sure.  
 25 Q. Have you ever reviewed the article to

1 Q. Do you have in your possession any of the  
 2 notes that you created relating to the creation of  
 3 these modules?  
 4 A. I may have some -- some notes that I made of  
 5 or relating to the concepts from which the modules  
 6 are created. Often I'll think about things and make  
 7 notes and from those notes derive things like  
 8 modules or articles or things like that.  
 9 MR. KOFMAN: Okay. I'd like to have the  
 10 transcript marked, and I'm going to make a request  
 11 for notes relating to the creation of modules for  
 12 teaching at NXIVM Intensives, and I'll follow up  
 13 with a letter.  
 14 (Request.)  
 15 MR. CAMPION: We'll respond in time.  
 16 MR. KOFMAN: Thanks.  
 17 BY MR. KOFMAN:  
 18 Q. Is it your understanding, Mr. Ranieri, that  
 19 the modules that are taught at NXIVM contain trade  
 20 secrets?  
 21 A. Yes.  
 22 Q. So we're clear on terminology, how would you  
 23 define a trade secret?  
 24 A. I'm a lay person. So from my perspective, a  
 25 trade secret is something that we believe is unique,

1 determine whether it contains any NXIVM trade  
 2 secrets?  
 3 A. Actually, I haven't reviewed it for that.  
 4 Q. Are you familiar with what portion of the  
 5 NXIVM materials constitutes trade secrets?  
 6 A. Not specifically. I'm more familiar with  
 7 things that are very important to NXIVM that we keep  
 8 as secret.  
 9 Q. Would those things be what you consider trade  
 10 secrets, or is there something that's a trade secret  
 11 in addition to what you say is very important to  
 12 NXIVM?  
 13 A. You know, I don't -- I don't know for sure.  
 14 I think that would have to be someone who knows  
 15 about that to make that evaluation.  
 16 Q. Does this article contain information that  
 17 NXIVM con -- that you consider unique to NXIVM, kept  
 18 as a secret by NXIVM, and would be a disadvantage to  
 19 NXIVM if it were disclosed?  
 20 MR. CAMPION: Could the reporter just  
 21 read that question again, please.  
 22 (The following was read back by the  
 23 reporter:  
 24 "Does this article contain information  
 25 that NXIVM con -- that you consider unique to NXIVM,

Page 109

1 kept as a secret by NXIVM, and would be a  
 2 disadvantage to NXIVM if it were disclosed?")  
 3 MR. CAMPION: In fairness to the  
 4 witness, counsel, can he read the document now?  
 5 MR. KOFMAN: Yes.  
 6 BY MR. KOFMAN:  
 7 Q. I'd like to you read the document because  
 8 then I'm going to have some specific questions about  
 9 the document. So you can take your time, sir, to  
 10 read it.  
 11 A. (Witness complies.)  
 12 Okay.  
 13 (A discussion was held off the record.)  
 14 MR. CAMPION: The question pending had  
 15 multiple parts.  
 16 Could you have the question reread,  
 17 please.  
 18 Q. Let me strike the question.  
 19 First of all, have you had an opportunity to  
 20 read the article?  
 21 A. Yes.  
 22 Q. Okay. Does this article contain what you  
 23 consider to be trade secrets of NXIVM using the  
 24 definition of trade secret that you previously gave  
 25 to me?

Page 110

1 A. Can I -- I need to say two things with  
 2 respect to the article.  
 3 The article is a reflection of someone who  
 4 claims to and says they read our trade secret  
 5 materials or at least some of them. Speaking from  
 6 that authority in my mind is something that in  
 7 violation of the confidentiality agreements violates  
 8 letting, if you will, secrets out of the bag. In  
 9 other words, if there's some trade secret that you  
 10 have and I go and just for the sake of argument I  
 11 get it inappropriately, and then I say, "I have this  
 12 trade secret I know. And, therefore, this is so,  
 13 this is so, this is so," they're benefitting from  
 14 the trade secret and are able to affect potentially  
 15 other people either knowing the trade secret or not  
 16 through what they say, so there are multi facets  
 17 here.  
 18 In the letter of what is said, there may be a  
 19 few things that -- certainly there are things here  
 20 that I think are important and secret. I think that  
 21 this is -- has a lot of factual problems and logical  
 22 problems.  
 23 Q. Okay. We'll take it in two steps. First,  
 24 can you tell me what is disclosed by this article  
 25 that is important and secret?

Page 111

1 A. There was a statement relating to anger and a  
 2 conflict of values.  
 3 Q. Actually, can you -- it might be helpful if  
 4 you circle this as well. I'll circle along with  
 5 you, but on the Exhibit you can mark it up what you  
 6 -- first of all --  
 7 A. I'm having trouble seeing it. I'm sorry.  
 8 Q. Oh, okay. I have the same problem, but if  
 9 you can circle what you think is important and  
 10 secret for NXIVM.  
 11 A. Okay, and I do have to say I can't say that  
 12 I will circle everything 'cause I'm not an expert;  
 13 and I also need to go through the logical truth and  
 14 fallacy in this article, and depending on what the  
 15 logical constructions are that makes a difference in  
 16 my mind as to what should be secret or not.  
 17 Q. Okay. Well, first I'd just like to have you  
 18 identify what you consider to be a trade secret  
 19 using your definition.  
 20 A. I'll scan through and find the anger  
 21 statement.  
 22 "All anger is created as a result of conflict  
 23 in values." That's the one statement that I --  
 24 Q. Where is that statement found?  
 25 A. Page 2, first paragraph under "Cult-Like

Page 112

1 Elements of the ESP Intensive," subparagraph  
 2 "Pretensions to Science."  
 3 Q. Yes.  
 4 A. It's an e.g. in parentheses.  
 5 Q. "All anger is created as a result of a  
 6 conflict in values"?  
 7 A. Uh-huh.  
 8 Q. What module is that contained in?  
 9 A. I suspect it's the Anger module, Anger  
 10 Sourcing.  
 11 Q. And is that a module that you developed the  
 12 concepts for?  
 13 A. Yes.  
 14 Q. And it's your understanding that the concept  
 15 expressed here is unique to NXIVM?  
 16 A. Yes --  
 17 Q. How does --  
 18 A. -- the concept as expressed here.  
 19 Q. How does this concept give NXIVM a  
 20 competitive advantage over competitors?  
 21 A. If we understand anger, we can help in  
 22 business certainly understand the way people act.  
 23 In personal relationships, it gives a greater degree  
 24 of compassion in understanding how people act; and  
 25 for people who want to explore within themselves,

1 they can explore that.  
 2 Q. Is the information that's presented here  
 3 about anger in this parenthetical sufficient for  
 4 someone to replicate NXIVM's teachings about anger?  
 5 A. I believe that it may. I'm not sure.  
 6 Q. Are you aware of any competitors who've used  
 7 that information since the publication of this  
 8 article?  
 9 A. No. There have been people who I believe  
 10 have threatened to or said they would who are --  
 11 have never been in NXIVM, but I don't know off the  
 12 top of my head of any competitor that has.  
 13 Q. Who's threatened to use this information?  
 14 A. Oh, there's in public forums, in debates, in  
 15 e-mails. Sometimes I've had in the past threatening  
 16 e-mails people said such things.  
 17 Q. Have you saved any of these e-mails?  
 18 A. There might be a few. Some of the older  
 19 ones, no; some of the newer ones, I may have.  
 20 MR. KOFMAN: I'd like to mark this part  
 21 of the transcript and make a request for any  
 22 information or for any of these e-mails.  
 23 (Request.)  
 24 BY MR. KOFMAN:  
 25 Q. Mr. Raniere, the people who sent these

1 A. I don't know. That may have happened. There  
 2 were times when articles or things from modules were  
 3 almost in the very beginning put on the websites. I  
 4 don't know if it ever happened. I don't believe so.  
 5 One of concerns was the Mission Statement because  
 6 there were people who felt that it was a good  
 7 recruiting tool.  
 8 Q. So you're not certain, but it may have  
 9 appeared on the website at some point in time?  
 10 A. Uh-huh. If it appeared on the website, I  
 11 would acknowledge then it's not a trade secret in a  
 12 normal sense, but I don't know if it did.  
 13 MR. SYLVESTER: Can I hear that answer  
 14 back, please.  
 15 (The following was read back by the  
 16 reporter:  
 17 "Uh-huh. If it appeared on the website,  
 18 I would acknowledge then it's not a trade secret in  
 19 a normal sense, but I don't know if it did.")  
 20 MR. SYLVESTER: Thank you.  
 21 BY MR. KOFMAN:  
 22 Q. Are you aware that some modules were put on  
 23 the website?  
 24 A. No.  
 25 Q. Do you believe that any modules were put on

1 e-mails, were they critics of the group or do you  
 2 know who they were?  
 3 A. No.  
 4 Q. Okay. What was the -- are there any other  
 5 trade secrets as you define the term that are  
 6 contained in this article?  
 7 A. Well, I had seen a few things; and it's not  
 8 just what is contained in the letter of the article.  
 9 It's contained in the implication of the article.  
 10 Q. Okay. What's contained in the implication of  
 11 the article that you consider -- first, is there  
 12 anything else in the letter of the article that you  
 13 see?  
 14 A. There was another thing relating to -- they  
 15 were primarily quotes that were taken. I would say  
 16 any of the quotes in here are suspect except, of  
 17 course, things like "thank" and "vanguard" and stuff  
 18 like that.  
 19 Q. Do you consider the 12 point Mission  
 20 Statement to contain trade secrets?  
 21 A. I consider it to contain secret things that  
 22 are very important to NXIVM, yes.  
 23 Q. Has the -- has NXIVM ever put the 12 point  
 24 Mission Statement or made it available on its  
 25 website?

1 the website?  
 2 A. No.  
 3 Q. What's your recollection or what's the basis  
 4 for your statement that they may have been put on  
 5 the website?  
 6 A. There were excerpts from the modules that I  
 7 thought may have been put on the website. Initially  
 8 each module and letter had an introduction; and  
 9 there at one point were some people that believed  
 10 those were good things, if you will, as selling  
 11 points so I don't believe any of those things went  
 12 on the website. Certainly no module, the questions  
 13 in its entirety was on the website.  
 14 Q. Do you remember the names of the people who  
 15 thought it was a good selling point to put some of  
 16 the mod -- parts of the modules on the website?  
 17 A. No, I don't.  
 18 Q. Are they still involved with NXIVM?  
 19 A. No.  
 20 Q. So as you sit here today, you don't remember  
 21 the names of any of these people?  
 22 A. There were a lot of people who were involved  
 23 in NXIVM in the very beginning who are no longer  
 24 involved.  
 25 Q. Does NXIVM have any records of what was put

1 on its website?  
 2 A. I'm not sure.  
 3 Q. Who created NXIVM's website at the -- when  
 4 the organization was founded?  
 5 A. I don't know.  
 6 Q. Okay. Getting back to the article, I need  
 7 you to underline every other trade secret that you  
 8 feel is contained in the letter of the document.  
 9 You have identified the one concerning anger.  
 10 A. Uh-huh.  
 11 It's hard for me to delineate if someone  
 12 hears something if they can derive or if, for  
 13 example, in the future it would help them derive.  
 14 If I hear a trade secret or I hear -- I'm sorry --  
 15 if I hear part of a trade secret and then hear  
 16 additional information afterwards or additional  
 17 parts of the trade secret, I might get the trade  
 18 secret in parts. So, for example, when they say  
 19 "shifter strategies" in here, in itself that  
 20 represents something that is a deeper trade secret,  
 21 I believe.  
 22 The name to some degree is self-explanatory.  
 23 If in another article someone were to publish  
 24 something else that was not completely that trade  
 25 secret using both of the articles, I could possibly

1 BY MR. KOFMAN:  
 2 Q. Okay. Back on.  
 3 A. I'm underlining a number of things which, for  
 4 example, if I believe Concept A is trade secret, if  
 5 I tell you a little bit about Concept A here, even  
 6 true or false; a little bit about Concept A here; a  
 7 little bit about Concept A there, that helps you  
 8 derive Concept A. That helps tell you. I can  
 9 ultimately give you a full description of Concept A  
 10 if I write enough or write different essays or -- do  
 11 you understand? So -- and there's -- I think  
 12 there's even some things I'm missing that by logical  
 13 construction I can derive information about Concept  
 14 A.  
 15 Q. Okay, understood. Thanks. Thank you for the  
 16 clarification.  
 17 (A discussion was held off the record.)  
 18 (At this point, Richard A. Ulsamer  
 19 entered the deposition room; Mr. McGuire was  
 20 excused.)  
 21 Continuing...  
 22 A. In some of -- in some of these cases, I'm  
 23 looking at this in a theoretical way, for example,  
 24 if he says a false statement about something, it  
 25 tells you about that something; and even if we by

1 derive it.  
 2 So do you want what I see also as parts?  
 3 Q. Yes. I want either parts or whole, whatever  
 4 is in here.  
 5 A. Oh, okay.  
 6 THE VIDEOGRAPHER: Excuse me. We have  
 7 to change tapes.  
 8 MR. KOFMAN: Okay.  
 9 THE WITNESS: So you want me to stop  
 10 reading?  
 11 MR. SYLVESTER: You can continue.  
 12 MR. KOFMAN: Just don't speak until  
 13 he's --  
 14 THE WITNESS: Okay.  
 15 (A discussion was held off the record.)  
 16 THE VIDEOGRAPHER: We're back on the  
 17 record at 3:49.  
 18 THE WITNESS: Can I ask you for a  
 19 clarification?  
 20 MR. KOFMAN: When we get back on the  
 21 record. Actually, is it --  
 22 THE WITNESS: Are we on?  
 23 THE VIDEOGRAPHER: We're on.  
 24 THE WITNESS: We're on the record.  
 25

1 necess -- either choose to say what the truth is,  
 2 then that starts to release a trade secret; and if  
 3 we don't say what the truth is, it damages us.  
 4 And as I'm going through this more and the  
 5 more I'm thinking of it, the more I'm outlining more  
 6 and more.  
 7 Is there some way we can summarize this or I  
 8 can do this for you?  
 9 Q. No. I'm looking -- my question I think was  
 10 pretty straightforward as to what trade secrets are  
 11 disclosed, and you've put in clarifications as to  
 12 how you under -- what you understand the disclosure  
 13 entails.  
 14 A. Uh-huh.  
 15 Q. So I think, you know, it's important for me  
 16 to get every trade secret that you consider  
 17 important to be disclosed.  
 18 A. Well, have you ever played 20 questions with  
 19 someone and they can disclose something without  
 20 saying directly what it is?  
 21 Q. And as we go -- as we follow up, you can  
 22 explain to me that that's what you're doing.  
 23 MR. CAMPION: Counsel, you're in control  
 24 of the deposition.  
 25 I do note that the witness appears to

1 have finished underlining the section entitled "Mind  
 2 Control"; and if you wanted to start to do that part  
 3 first, that's certainly your option. Otherwise,  
 4 he'll finish doing the whole document.  
 5 MR. SYLVESTER: Why don't you have him  
 6 do the whole document.  
 7 MR. CAMPION: All right, fine.  
 8 MR. SYLVESTER: Why stop the pen.  
 9 MR. CAMPION: Okay.  
 10 Hal, is it okay if we take our last  
 11 break at 4:15?  
 12 MR. KOFMAN: Yes.  
 13 MR. CAMPION: Okay, fine.  
 14 THE WITNESS: Done.  
 15 BY MR. KOFMAN:  
 16 Q. Okay. Can I take a quick look, and then I'll  
 17 give it back to you, sir?  
 18 A. Yes.  
 19 MR. CAMPION: We'll have copies made at  
 20 the recess.  
 21 MR. KOFMAN: That sounds good. That's  
 22 good.  
 23 THE WITNESS: What time is it?  
 24 MR. CAMPION: Almost.  
 25

1 pieces, but also it puts us in a situation so I'm  
 2 not sure -- I don't know if I did the assignment  
 3 right.  
 4 Q. Well, let's -- okay. What are the trade  
 5 secrets that are disclosed, starting from the top?  
 6 A. I don't want to say what the trade secrets  
 7 are per se, but, for example --  
 8 Q. No. Please identify each and every trade  
 9 secret.  
 10 THE WITNESS: Am I supposed to be able  
 11 to identify trade secrets, and it will be fine?  
 12 MR. CAMPION: Do the best you can.  
 13 Q. Using your definition.  
 14 A. Okay. It says, "I have reviewed a manual for  
 15 a 16 day," ten hour day (sic); "large group  
 16 awareness training called 'Executive Success  
 17 Programs,' which also calls itself 'ESP.'"  
 18 What's -- the large group awareness training  
 19 program is really a mischaracterization of something  
 20 that is taken as an individual. This takes the  
 21 Intensive and muddles it with ESP. So now what we  
 22 must begin to do is define what is an Intensive.  
 23 What is the curriculum like of ESP specifically.  
 24 What does it mean to have a module. How long are  
 25 those modules.

1 BY MR. KOFMAN:  
 2 Q. Mr. Raniere, can you identify for me each  
 3 trade secret that you've underlined and tell me why  
 4 it constitutes a trade secret?  
 5 A. I don't -- I'm not qualified to say what is  
 6 or not a trade secret, but what I started to  
 7 understand even more as I read the essay, by a  
 8 person having the trade secrets and having the  
 9 manual and then making comments, either true or  
 10 false, it puts us in a situation and NXIVM in a  
 11 situation where NXIVM either has to be damaged by  
 12 the release of their trade secrets or release it  
 13 themselves.  
 14 And, you know, there are in almost every  
 15 sentence there are parts of things that are trade  
 16 secrets or what I'm calling trade secrets. I should  
 17 say things that are secret and essential to ESP and  
 18 things that are not true that beg the question of  
 19 what is true and essential to ESP.  
 20 If this were written by a person that did not  
 21 have the manual, it would be a whole different  
 22 issue, so I can start to explain what each of these  
 23 things imply or don't imply; but anyone who reads  
 24 this article starts to not only get the pieces and  
 25 maybe a lot of the pieces, maybe enough of the

1 So some of the things, for example, the  
 2 actual structure of the modules, that they are  
 3 interchangeable, that they are like puzzle pieces,  
 4 that there is an overview order to them so that you  
 5 can create things like Intensives. You can create  
 6 -- any sort of thing is a trade secret. The nature  
 7 of that structure was in the curriculum or is, I  
 8 should say a secret. This starts to confuse the  
 9 issue in such a way that, one, it starts to cause  
 10 us to beg or begs an explanation; but, two, it  
 11 starts to say things about how the curriculum is  
 12 structured.  
 13 Q. What would your compet -- what in this  
 14 sentence is secret, the fact that it's 16 days?  
 15 A. It's not one single fact. I mean, what the  
 16 -- what he is saying in this sentence is that he's  
 17 reviewed a manual, okay, so he gives himself  
 18 authority of having these trade secrets. These  
 19 trade secrets are in the manual. He's reviewed it,  
 20 and 16 day ten hour a day, he is characterizing it  
 21 as a large group awareness training called Executive  
 22 Success Programs, which also calls itself ESP.  
 23 Executive Success Programs is not a large  
 24 group awareness training. You know, Executive  
 25 Success also has -- if you call the Intensive a

Page 125

1 large group awareness training, it also has Origins,  
 2 it also has Ethos, it also has the Ethicist  
 3 training, it also has Parenting. It has many, many  
 4 different curricula and ways of dispensing them.  
 5 Q. What in this sentence is secret?  
 6 A. In itself, it's only part of a secret. The  
 7 sentence doesn't contain any secret.  
 8 Q. Okay. What's the next thing that you've  
 9 underlined?  
 10 MR. SYLVESTER: Wait. Let me hear that  
 11 last answer back.  
 12 MR. KOFMAN: Could you read that?  
 13 A. The sentence I don't think contains --  
 14 MR. SYLVESTER: That's all right. If he  
 15 wants to restate it, that makes life easy.  
 16 Go ahead, sir.  
 17 Continuing...  
 18 A. I did not think the sentence contained a  
 19 secret. The sentence was part of a secret.  
 20 Q. Okay. What's the next thing you've  
 21 underlined?  
 22 MR. CAMPION: It's 20 of -- 20 after 4  
 23 now. Let's take a short break, okay.  
 24 MR. SYLVESTER: Mr. Campion, maybe if we  
 25 can have a copy of that made.

Page 126

1 MR. KOFMAN: Are we off?  
 2 (At this point, there was a short  
 3 recess.)  
 4 THE VIDEOGRAPHER: We're back on the  
 5 record at 4:34.  
 6 BY MR. KOFMAN:  
 7 Q. Okay. Mr. Ranieri, I want to show you and  
 8 mark a document Ranieri-6.  
 9 (Robert Jay Lifton's eight criteria of  
 10 thought reform as applied to the Executive Success  
 11 Programs Bates stamped P000003648 through 3661 was  
 12 received and marked Defendant's Exhibit Ranieri-6  
 13 for Identification.)  
 14 BY MR. KOFMAN:  
 15 Q. Okay. Mr. Ranieri, just going back to  
 16 Ranieri-5 for one moment, I just want to make clear  
 17 that I had instructed you to underline everything  
 18 that you considered to be a trade secret using your  
 19 definition; and that is what you've underlined,  
 20 correct?  
 21 A. No. If I have a trade secret -- and I was  
 22 thinking about this, how to describe it. If I have  
 23 a trade secret that's an elephant and I tell you,  
 24 well, it has a trunk, it has four legs, has a tail,  
 25 is big, is a mammal, the trade secrets are revealed

Page 127

1 by those things. So what I underlined were the  
 2 things that I found that were indicating shadows,  
 3 if you will, of the trade secret; not necessarily  
 4 have called it a secret. It's a secret, not a trade  
 5 secret. I don't know what a trade secret is.  
 6 Q. Well, again, when I say "trade secret," I'm  
 7 using the definition you gave me.  
 8 A. Yeah, my definition.  
 9 Q. So you gave me either what is in itself a  
 10 trade secret or indicates a trade secret?  
 11 A. Uh-huh. Like, for example, the next thing I  
 12 underlined which is, "There is much in the content  
 13 and format of ESP" --  
 14 Q. Yes.  
 15 THE WITNESS: Can I say things that I  
 16 feel are secret here?  
 17 MR. CAMPION: Covered by the  
 18 confidentiality arrangement.  
 19 THE WITNESS: Thank you.  
 20 BY MR. KOFMAN:  
 21 Q. You're looking at which paragraph now, sir?  
 22 A. It is under "Introduction." It's the last  
 23 paragraph. "There is much in the content and  
 24 format" --  
 25 The trade secret nature of the curriculum

Page 128

1 stems in part from the actual order of the  
 2 curriculum as on the gross level. It is like a  
 3 puzzle. Each piece is a two-hour module. Those  
 4 pieces can be interlocked in specific ways and only  
 5 specific ways. Within each two-hour module, there  
 6 are questions. Those questions can be interlocked  
 7 in only certain ways; likewise, even sometimes the  
 8 wordings within a question. One of the things that  
 9 makes us very unique is we can take those two-hour  
 10 modules and because we have a specific relationship  
 11 of all of them, how they interrelate with each other  
 12 philosophically, like a puzzle piece, you can put a  
 13 training together with great facility and with great  
 14 consistency.  
 15 The nature of that is secret and a  
 16 competitive advantage. And every time people start  
 17 to hint at, well, this came first, this came second  
 18 or this is what this question was, this is what that  
 19 question was, it chisels away even at that concept.  
 20 Q. Is there anything that's disclosed in this  
 21 sentence, "There is much in the content and format  
 22 of ESP that is not at all original, and is quite  
 23 similar to aspects of a number of cults and  
 24 cult-like organizations with which I am familiar"  
 25 that you consider to be a trade secret?



Page 129

1 A. Included within the sentence?  
 2 Q. Yes --  
 3 A. No.  
 4 Q. -- anything in that sentence.  
 5 A. Included within the sentence, no, but I  
 6 believe that the inaccuracy of the sentence and the  
 7 fact that here is a person that has taken our trade  
 8 secret module and is commenting on it starts to say  
 9 it has a trunk, it doesn't have three legs, it has  
 10 four legs, so no. In answer to your question, no,  
 11 not contained within the sentence.  
 12 Q. Okay. You've underlined -- I think the next  
 13 thing -- you have a check mark next to "Long hours."  
 14 Was that indicating that that paragraph  
 15 contains trade secret?  
 16 A. Let me see.  
 17 I think I was questioning the sentence, "ESP  
 18 Intensive participants are signing up for sixteen  
 19 ten-hour days, which will either be experienced  
 20 successively, or in five-day segments. Although  
 21 three hours a day are allotted for lunch and dinner  
 22 breaks," as giving insight to the structure and the  
 23 way things are structured. So I didn't underline  
 24 it. Maybe I should have from that theory.  
 25 Q. Is it your understanding that a competitor

Page 130

1 would be able to use the fact that you have 16-hour  
 2 days or that it can be done in 5-day segments with  
 3 3-hour breaks to their competitive advantage and  
 4 your disadvantage?  
 5 A. In isolation, no.  
 6 Q. Okay. You've underlined the sentence -- it's  
 7 on the next to last paragraph.  
 8 "Participants are told to promise not to tell  
 9 non-participants of what they learn in the  
 10 Intensive, as well as its methods."  
 11 A. Uh-huh.  
 12 Q. Does that contain a trade secret?  
 13 A. Within that, no.  
 14 Q. Why did you underline it?  
 15 A. Because, again, I believe it is beginning to  
 16 sculpt away at the elephants if the elephants are  
 17 trade secrets.  
 18 Q. And would the same go for the bottom of the  
 19 first page, the last paragraph you've underlined,  
 20 "Participants are told to promise not to share with  
 21 non-participants their recollection of content or  
 22 methods of the Intensive. Participants are mislead  
 23 (sic) into feeling guilty for being a 'promise  
 24 breaker."  
 25 A. Yes.

Page 131

1 Q. Does that disclose a trade secret?  
 2 A. Those things are again either statements that  
 3 are false that need to be proven false for us to be  
 4 viable or part of a trade secret; but, no, they do  
 5 not in themselves contain trade secrets.  
 6 Q. Is it your understanding that you would have  
 7 to reveal a trade secret to prove that statement  
 8 false?  
 9 A. I would have to reveal more of a trade  
 10 secret.  
 11 Q. I'd like to show you the document we've  
 12 marked as Raniere-6, which is entitled "Robert Jay  
 13 Lifton's eight criteria of thought reform as applied  
 14 to the Executive Success Programs" and --  
 15 A. Are we done with this document?  
 16 Q. For now, yeah.  
 17 First of all, have you seen this document  
 18 before?  
 19 A. Yes.  
 20 Q. Is this one of the documents that it was  
 21 posted on the Ross websites?  
 22 A. Yes.  
 23 Q. And have you ever reviewed this document to  
 24 determine whether it contains trade secrets as you  
 25 define the term?

Page 132

1 A. I've looked at it generally for that. In  
 2 this particular case, this is more on point to  
 3 containing more direct trade secrets.  
 4 Q. Okay. When did you look at this to see if it  
 5 contains trade secrets?  
 6 A. Years ago.  
 7 Q. Okay. I'd like you to do the same exercise  
 8 and underline for me all of the trade secrets that  
 9 are disclosed in this article as you define the term  
 10 trade secret.  
 11 A. Does this include also the parts, as I did  
 12 with this one?  
 13 Q. Yes, whatever you feel is appropriate to  
 14 answer the question.  
 15 A. Maybe I don't understand the question. I  
 16 feel like I'm trying to give you an understanding  
 17 of my understanding of this. I will go through that  
 18 exercise, but everything that implies trade secrets  
 19 to me I will underline.  
 20 Q. Okay. I'd like you to underline for me  
 21 everything that is -- that you contend is unique to  
 22 NXIVM, that NXIVM keeps as a secret, and would be  
 23 disadvantageous to NXIVM to have disclosed.  
 24 A. Even if it's a partial fact?  
 25 Q. Correct.

1 A. Partial, okay.  
 2 Q. Thank you.  
 3 THE VIDEOGRAPHER: Excuse me. I'm going  
 4 to change tapes.  
 5 THE WITNESS: You want me to stop?  
 6 MR. KOFMAN: No, you can keep going.  
 7 THE VIDEOGRAPHER: We're back on the  
 8 record at 5:01.  
 9 BY MR. KOFMAN:  
 10 Q. Are you finished, Mr. Raniere?  
 11 A. I'm just checking.  
 12 Q. Okay.  
 13 MR. KOFMAN: Tom, I'll ask for a copy of  
 14 this before I leave.  
 15 MR. CAMPION: Sure.  
 16 Q. Mr. Raniere, I noticed on this article, the  
 17 page that's Bates stamped P3659, about midway  
 18 through, it said "Cult - this is a label that  
 19 conveys no meaning but devalues the group. It is  
 20 designed to keep people away from the group without  
 21 saying what is wrong with it. Example: 'That's a  
 22 cult.'"  
 23 And I take it that's a quote from the module  
 24 entitled Parasite/Producer III - Practice.  
 25 A. Yes.

1 I believe sometimes terms, their technical  
 2 meanings can influence people because, well, people  
 3 don't know the technical meaning. They just know  
 4 the more common meaning.  
 5 Q. So is it your understanding that the term  
 6 cult is neither a positive or pejorative?  
 7 A. In a technical sense, because I've seen no  
 8 definition of the term. The dictionary definition  
 9 of the word is -- can be negative, can be positive;  
 10 yeah.  
 11 Q. For example, are you familiar with the  
 12 Peoples Temple?  
 13 A. No. I can imagine what it is but --  
 14 Q. They were the group that committed mass  
 15 suicide in Jonestown, Guyana, in the late '70s.  
 16 A. Okay, yes.  
 17 Q. Would you characterize them as a cult?  
 18 A. I don't know. I would call them a  
 19 destructive group.  
 20 Q. Okay. Shifting gears just a little bit, do  
 21 you recall that Forbes magazine published an article  
 22 about you and NXIVM in --  
 23 A. Yes.  
 24 Q. -- 2003?  
 25 A. Yes.

1 Q. And that's a concept that you created?  
 2 A. Yes.  
 3 Q. Is it your contention there is -- there are  
 4 no such things as cults?  
 5 A. No.  
 6 Q. What is -- how would you define a cult?  
 7 A. I don't have a definition nor have I found a  
 8 definition.  
 9 Q. In broad strokes, what would you term to be a  
 10 cult?  
 11 A. I would like to answer this in two parts.  
 12 Q. Sure.  
 13 A. It's my belief that the common person, the  
 14 person on the street who is -- has not gone and  
 15 specifically looked at cults, investigate cults,  
 16 believes that cult is a negative term.  
 17 I believe that cult is some sort of a -- the  
 18 second part of the question -- some sort of a  
 19 description that is used in the hopes of classifying  
 20 people as a group without being able to state often  
 21 what the common element is. Sometimes in a  
 22 historical sense that's useful because cults -- they  
 23 say cults can become culture. They say, you know,  
 24 most groups or communities could be considered a  
 25 cult; and then it therefore develops.

1 Q. Did you meet with the reporter from Forbes  
 2 magazine before the article was published?  
 3 A. Yes.  
 4 Q. On how many occasions?  
 5 A. One.  
 6 Q. Do you know what led Forbes to write an  
 7 article about you and NXIVM?  
 8 A. I'm not exactly sure. The reporter implied  
 9 at first that it was Rick Ross, and then the  
 10 reporter stuttered and stammered a bit and retracted  
 11 that so I don't know.  
 12 Q. What did he say that implied it was  
 13 Rick Ross?  
 14 A. When asked, "Why us?" He said, "Well, I had  
 15 a meeting with Rick Ross and I decide -- well" --  
 16 I'd say he sort of -- he started some sentence,  
 17 implying seemingly that the article was instigated,  
 18 or I shouldn't say instigated, that the seminal  
 19 meeting for the article occurred with Rick Ross.  
 20 Q. Had NXIVM filed the lawsuit before that,  
 21 before you met with that reporter?  
 22 A. I believe so.  
 23 Q. Okay. Did you tape record or -- strike that.  
 24 Was the meeting with the reporter tape  
 25 recorded or videotaped?

Page 137

1 A. We had wanted to videotape it. The reporter  
 2 said he did not want it videotaped but that  
 3 audiotaping was okay. They tried to use the audio  
 4 on the video recorder, and I don't know if it  
 5 actually worked because from what I've understood,  
 6 the tape doesn't seem to exist.  
 7 Q. When you say "They tried to," who is "they"?  
 8 A. Nancy was there. Arlen Olsen was there. I  
 9 think there might have been one or two other people  
 10 there.  
 11 Q. Was Kristin Keeffe there?  
 12 A. You know, I don't know.  
 13 Q. Who was operating the tape machine?  
 14 A. You know, I -- it might have been set up  
 15 originally by someone like Arlen and then left  
 16 unattended because we were sitting.  
 17 Q. When did you discover that the -- strike  
 18 that.  
 19 Is it your understanding that nothing was  
 20 ever recorded?  
 21 A. I'm not sure. I discovered just recently  
 22 that there seemed not to be a recording of that.  
 23 Q. Okay. At the time, it was your understanding  
 24 that it was being recorded?  
 25 A. I thought it was.

Page 138

1 Q. Did you ever hear the tape?  
 2 A. No.  
 3 Q. Okay. Did -- did you or anyone at NXIVM give  
 4 the reporter any materials to look at?  
 5 A. I'm not sure. He was at least given a  
 6 confidentiality agreement.  
 7 Q. Okay. Do you know one way or the other as  
 8 you sit here whether he received any modules?  
 9 A. I don't believe so. I don't know.  
 10 Q. Was he allowed to observe anything at NXIVM?  
 11 A. Yes. He went to the NXIVM Center.  
 12 Q. What did he -- was he allowed to observe?  
 13 A. I don't know exactly. I was not there. I  
 14 know he spoke to several people.  
 15 Q. Okay. Did he -- do you know if he sat in on  
 16 a class?  
 17 A. I don't believe so. I believe he refused to  
 18 sign the confidentiality agreement, therefore would  
 19 not be allowed to sit in on a class.  
 20 Q. Do you know who accompanied him as he visited  
 21 the center?  
 22 A. No.  
 23 Q. Do you know who he spoke to from NXIVM?  
 24 A. I know of one person specifically.  
 25 Q. Who is that?

Page 139

1 A. Emiliano Salinas. I think at the end of the  
 2 Forbes article there is a quote from Sara Bronfman,  
 3 although I'm not sure. So if that be the case, then  
 4 he probably spoke to her there.  
 5 Q. Okay. Have you had any conversations with  
 6 him at any time after that ar -- after the art --  
 7 that one meeting prior to the article's publication?  
 8 A. No, I don't believe so.  
 9 Q. Did you have an opinion as to --  
 10 A. No. Hold on.  
 11 Q. Strike that.  
 12 A. They did a fact-checking type of phone call  
 13 so, yes, there was a conversation. It was a woman  
 14 that was doing it, though, not him.  
 15 Q. Do you remember her name?  
 16 A. No.  
 17 Q. And was this a call made to you?  
 18 A. Yes, I believe so.  
 19 Q. And do you remember what facts she wanted to  
 20 check?  
 21 A. No. It was a series of representations.  
 22 Some of them seemed accurate; some of them seemed  
 23 not accurate.  
 24 Q. Did you correct what you considered to be  
 25 inaccurate?

Page 140

1 A. To the best of my ability. There was an  
 2 additional communication. I ended up faxing I  
 3 think him answers to two questions which were he  
 4 wanted my response with something with respect to  
 5 Toni Natalie.  
 6 Q. And did you fax him information?  
 7 A. Just a simple response.  
 8 Q. Did you save a copy of the fax?  
 9 A. No.  
 10 Q. Where was it faxed from?  
 11 A. I think it was faxed from my residence.  
 12 Q. Did you put the fax into a file or the papers  
 13 that you faxed into a file someplace?  
 14 A. No.  
 15 Q. Did you discard them?  
 16 A. They were probably discarded.  
 17 MR. KOFMAN: I'll make a request for  
 18 anything that was faxed to Forbes.  
 19 (Request.)  
 20 Q. Have you ever spoken to reporters from the  
 21 Albany Times-Union?  
 22 A. Yes.  
 23 Q. On how many occasions?  
 24 A. May I clarify?  
 25 Q. Yes.

Page 141

1 A. Before NXIVM. After NXIVM, I don't believe I  
 2 have.  
 3 Q. Have you ever met with Dennis Yusko?  
 4 A. No.  
 5 Q. Okay. Did you consider the Forbes article  
 6 to be positive or negative towards NXIVM?  
 7 A. I considered the Forbes article to be  
 8 negative and untrue towards NXIVM.  
 9 MR. KOFMAN: I'd like to you mark this  
 10 as Ranieri-7.  
 11 (Executive Success Programs, Inc.  
 12 Student Enrollment Application of Stephanie Franco  
 13 Bates stamped P000004105 was received and marked  
 14 Defendant's Exhibit Ranieri-7 for Identification.)  
 15 MR. KOFMAN: For the record -- I'm sorry  
 16 -- Ranieri-7 is a one-page document that was  
 17 produced to us in discovery. It's Bates stamped  
 18 P4105, and it purports to be Student Enrollment  
 19 Application of Stephanie Franco.  
 20 BY MR. KOFMAN:  
 21 Q. Mr. Ranieri, have you ever seen this form of  
 22 document before?  
 23 A. Yes.  
 24 Q. Have you ever seen the Student Terms and  
 25 Conditions at the bottom?

Page 142

1 A. Oh, you mean the four points, the four --  
 2 ending with "Disclaimer"?  
 3 Q. Yes.  
 4 A. Yes.  
 5 Q. Did you draft those?  
 6 A. I -- I participated in drafting some of it, I  
 7 think, because some of it came from a past company  
 8 that I had. I believe the attorneys, whoever they  
 9 were at the time, drafted them.  
 10 Q. The attorneys from the past company drafted  
 11 them?  
 12 A. No, NXIVM. I -- it might have been Arlen  
 13 Olsen. I'm not sure.  
 14 Q. And when were these drafted?  
 15 A. I don't know. Does it have a revision date  
 16 on the bottom?  
 17 Q. It says "Copyright 2000."  
 18 A. I don't know which version or when these were  
 19 drafted but 2000 or before.  
 20 Q. What was the prior company that had similar  
 21 Student Terms and Conditions?  
 22 A. Well, there were similar -- there weren't  
 23 Student Terms and Conditions, but it was Consumers'  
 24 Buyline.  
 25 Q. Okay. Did you sit down with Arlen Olsen

Page 143

1 and participate in the drafting?  
 2 A. No.  
 3 Q. What was your involvement in the drafting of  
 4 these terms and conditions?  
 5 A. Suggesting certain things. I think at one  
 6 point I read an initial draft and asked for  
 7 potential changes or what would happen if something  
 8 went one way or another.  
 9 Q. Did anybody else review the potential draft  
 10 besides you?  
 11 A. I don't know.  
 12 Q. Anyone else from NXIVM?  
 13 A. I don't know.  
 14 Q. Why were you the person from NXIVM who was  
 15 reviewing the Student Terms and Conditions?  
 16 A. Because I have some lay legal experience  
 17 because of some of the -- my lay legal experience of  
 18 the past.  
 19 Q. Does it say anywhere in these Student Terms  
 20 and Conditions that a person cannot take Executive  
 21 Success Programs if they've ever taken a course with  
 22 a competitor?  
 23 A. I don't know. I'd have to read this, and is  
 24 this the full -- is this a two-sided form or a  
 25 one-sided form?

Page 144

1 Q. It's my understanding that this is the  
 2 complete document.  
 3 A. Okay. Do you want me to read it to see if it  
 4 says that?  
 5 Q. Yes.  
 6 A. Okay.  
 7 MR. CAMPION: Go ahead.  
 8 A. Do you mind if I use a set of binoculars?  
 9 MR. KOFMAN: What's that?  
 10 MR. CAMPION: I circled a word there.  
 11 THE WITNESS: Do you want me to  
 12 continue?  
 13 MR. KOFMAN: Yes, please do.  
 14 Oh, I see.  
 15 MR. CAMPION: Okay.  
 16 MR. KOFMAN: I'll bring something  
 17 tomorrow.  
 18 Continuing...  
 19 A. This refers to back of this application, by  
 20 the way.  
 21 It says, "See important cancellation notice  
 22 on the back of this application," so it appears  
 23 there might be writing.  
 24 Q. All right. I'll have to take a look.  
 25 If you can just look at the Student Terms and

1 Conditions.  
 2 A. Can I read the top, also?  
 3 Q. Excuse me?  
 4 A. Can I read the top, also?  
 5 Q. Yes, of course.  
 6 A. I'm having trouble reading this. I'm so  
 7 sorry.  
 8 Q. Well, if you're having trouble reading it, I  
 9 can try and bring a clearer copy, you know, blow it  
 10 up a little tomorrow.  
 11 A. That would be helpful, although I did note on  
 12 the top where it says "I understand if I choose to  
 13 leave ESP, I must return all course related  
 14 materials and that making use of such materials  
 15 after leaving constitutes fraud."  
 16 That speaks to what you had asked but not as  
 17 -- it's not it directly.  
 18 Q. Does that speak to whether someone can come  
 19 to take NXIVM classes if they had taken a class with  
 20 a competitor before?  
 21 A. No.  
 22 Do you want me to continue this now, or would  
 23 you like to do that tomorrow?  
 24 Q. We can do that tomorrow if you're having  
 25 trouble -- difficulty reading it.

1 Q. Is this one of the articles that was posted  
 2 on the Rick Ross websites?  
 3 A. I believe so.  
 4 Q. Okay. I'd like you, and I understand that we  
 5 may not get through it but -- strike that.  
 6 Did you read this at approximately the time  
 7 that it was posted?  
 8 A. Yes. I'm assuming this is the other  
 9 Paul Martin article, authored by him.  
 10 Q. Okay, and did you read it to determine  
 11 whether it revealed trade secrets?  
 12 A. I believe I did, although more that -- I want  
 13 to be sure I know which document this is.  
 14 Well, I believe so.  
 15 Q. I'd like you to undertake the same exercise  
 16 with respect to identifying the trade secrets that,  
 17 as you define the term, that are disclosed in this  
 18 article with the remaining time we have today; and  
 19 if you're not finished, we can pick it up tomorrow.  
 20 MR. CAMPION: Would it be of value if he  
 21 did it overnight? You can move into something else  
 22 now.  
 23 MR. KOFMAN: We can agree to do it  
 24 overnight, as long as a representation that he won't  
 25 consult with anyone since this is basically part of

1 A. Yes.  
 2 Q. And I'll bring back a clearer copy so that  
 3 we can -- 'cause I have a few questions about the  
 4 document.  
 5 A. Thank you.  
 6 MR. KOFMAN: Off the record.  
 7 (A discussion was held off the record.)  
 8 MR. KOFMAN: All right.  
 9 While I've got you, you've marked --  
 10 I'd like to have this marked as Raniere  
 11 -- Raniere-8.  
 12 THE WITNESS: Should I put this aside  
 13 for now?  
 14 MR. KOFMAN: Yes, please.  
 15 (A Critical Analysis of the Executive  
 16 Success Programs Inc., Bates stamped P000003674  
 17 through 3682 was received and marked Defendant's  
 18 Exhibit Raniere-8 for Identification.)  
 19 MR. KOFMAN: For the record, Raniere-8  
 20 is a document -- is an article or a document  
 21 entitled A Critical Analysis of the Executive  
 22 Success Programs Inc.  
 23 BY MR. KOFMAN:  
 24 Q. Do you recognize this document, sir?  
 25 A. Yes.

1 the testimony.  
 2 THE WITNESS: I won't.  
 3 MR. KOFMAN: Okay.  
 4 MR. CAMPION: So you'll mark it up and  
 5 bring it in tomorrow.  
 6 THE WITNESS: Yup. Am I allowed to take  
 7 something with this stamp on it out?  
 8 MR. KOFMAN: Yeah.  
 9 THE WITNESS: Okay.  
 10 MR. CAMPION: You can take it out.  
 11 We're going to Xerox it once it's marked up by you.  
 12 BY MR. KOFMAN:  
 13 Q. I'd like you to take a look at the document  
 14 we marked as Raniere-2, which is your August 18TH  
 15 Affidavit.  
 16 A. Raniere-2, yes.  
 17 Q. Paragraph 3 you discuss the -- something in  
 18 the John Hochman article concerning the need for  
 19 students to make daily brief phone calls to check in  
 20 with their coaches.  
 21 A. Uh-huh.  
 22 Q. To your knowledge, are there any courses at  
 23 NXIVM or any programs at NXIVM that would require a  
 24 student to make -- to check in daily with their  
 25 coach?

Page 149

1 A. No.  
 2 Q. Okay. Is there --  
 3 A. Can I be more specific?  
 4 Q. Sure, if you need to to answer the question.  
 5 A. Modules -- there is one module that suggests  
 6 a daily practice and a check-in and it is not --  
 7 there's no such thing, if you will, as a  
 8 requirement.  
 9 Q. Okay. What's the name of that module?  
 10 A. Persistence.  
 11 Q. Okay. What about --  
 12 A. Motivated state, I believe, Persistency in  
 13 motivated state.  
 14 Q. What about for students who are taking  
 15 advanced courses in NXIVM? Are they required to  
 16 have daily check-ins?  
 17 A. No.  
 18 MR. KOFMAN: Mark this, please, as  
 19 Ranieri-9. Is it 9?  
 20 (Document headed Persistence Bates  
 21 stamped SF00104 through 108 was received and marked  
 22 Defendant's Exhibit Ranieri-9 for Identification.)  
 23 BY MR. KOFMAN:  
 24 Q. Mr. Ranieri, is the document we've marked as  
 25 Ranieri-9 a copy of the module, the Persistence

Page 150

1 module to which you just referred?  
 2 A. It appears to be that.  
 3 Q. Okay. Looking under the word "Arranging for  
 4 Coaching support" --  
 5 A. Uh-huh.  
 6 Q. This is about two-thirds of the way.  
 7 MR. LANDY: I think you didn't pass it  
 8 around.  
 9 MR. KOFMAN: Oh, I'm sorry. I  
 10 apologize, guys.  
 11 BY MR. KOFMAN:  
 12 Q. Do you see the sentence under "Arranging for  
 13 Coaching support" where it says, "It is your  
 14 responsibility to set a time with your coach on a  
 15 daily basis for check-in"?  
 16 A. Uh-huh.  
 17 Q. Is there anything about that sentence that  
 18 suggests that it's op -- that daily check-ins are  
 19 optional?  
 20 A. No.  
 21 Q. Okay. Based on that, does that change your  
 22 testimony that it's only optional for students to  
 23 check in with coaches daily?  
 24 A. No.  
 25 Q. Do coaches or the person teaching it say,

Page 151

1 guys, where we say it's your responsibility to set a  
 2 time, we really don't mean that?  
 3 A. No.  
 4 Q. How about where it says, "Students must speak  
 5 to contact either by phone or in person daily"? Is  
 6 that an optional -- does that say that it's  
 7 optional?  
 8 A. No.  
 9 Q. Is that a mandatory requirement?  
 10 A. No.  
 11 Q. How would you characterize it where it says,  
 12 "Students must speak to contact either by phone or  
 13 in person daily"?  
 14 A. If you choose to do this practice, then that  
 15 is what you would do.  
 16 Q. And what in the terms, "Students must speak  
 17 to contact either by phone or in person daily"  
 18 suggests that it's optional?  
 19 A. In that, if you choose to do the practice,  
 20 that isn't optional.  
 21 Q. When you say, "If you choose to do the  
 22 practice," which means if you choose to take the  
 23 course?  
 24 A. No.  
 25 Q. If you choose to do the Persistence module?

Page 152

1 A. No. If you choose to do a Persistency. If  
 2 you take the Persistency module, persistency is  
 3 presented as a tool that can be used. If you choose  
 4 to do Persistency, you do it and do a daily check-in  
 5 as you do it.  
 6 Q. Do all students who take the 16-day Intensive  
 7 take the Persistency module?  
 8 A. Yes, I believe.  
 9 MR. KOFMAN: Okay. Please mark this as  
 10 Ranieri-10.  
 11 (Document headed Rules and Rituals  
 12 Bates stamped SF00033 through 40 was received and  
 13 marked Defendant's Exhibit Ranieri-10 for  
 14 Identification.)  
 15 BY MR. KOFMAN:  
 16 Q. Is -- are you familiar with the document  
 17 we've marked as Ranieri-10?  
 18 A. I don't have it yet.  
 19 Q. Oh, I'm sorry.  
 20 Are you familiar with the document we've  
 21 marked as Ranieri-10?  
 22 A. Not directly, but I know such a document  
 23 exists.  
 24 Q. Did you create the concepts that are  
 25 incorporated in the Rules and Rituals module?

1 A. I believe most of them, if not all of them.  
 2 Q. Okay, and is this one of the first modules  
 3 that's taught in the school?  
 4 A. In certain programs.  
 5 Q. Which programs?  
 6 A. Ethos and the Level 1 Intensive.  
 7 Q. Okay. Turning your attention to Page 4 of  
 8 this document, the paragraph numbered 9, "Phone  
 9 tree."  
 10 A. Uh-huh.  
 11 Q. Can you read for me the last sentence of  
 12 this?  
 13 A. "Students involved in the more advanced  
 14 aspects of ESP will speak to their Coaches at least  
 15 once a day."  
 16 Q. What are the more advanced aspects to which  
 17 you refer?  
 18 A. Higher ranks is I believe what was  
 19 contemplated at the time.  
 20 Q. High -- which ranks? From which ranks on  
 21 up?  
 22 A. I believe proctor and maybe coaches.  
 23 Q. Looking at Page 3 of this document under the  
 24 paragraph that -- the first paragraph that says  
 25 "Stripes."

1 Q. Who was that?  
 2 A. Toni Natalie.  
 3 Q. And did ESP receive a percentage of what  
 4 students bought, of the money that was paid by  
 5 students?  
 6 A. No, I don't believe so.  
 7 Q. Where was the store operated from?  
 8 A. There was one in Clifton Park, and later on  
 9 there was also one in Saratoga.  
 10 Q. Were students encouraged to use the buying  
 11 coalition?  
 12 A. To some degree. If it -- if it suited them.  
 13 Q. Did you encourage students to use the buying  
 14 coalition?  
 15 A. Um, if it suited them.  
 16 Q. Okay.  
 17 A. I was a believer in it.  
 18 Q. Okay. I'd like you to look back -- going  
 19 back to Ranieri-2, your Affidavit from August 18th,  
 20 looking at Paragraph 4. You state that, "Promotion  
 21 is based on a committee with the students input."  
 22 Who is on the committee that decides on --  
 23 strike that.  
 24 In 2001-2002, who was on the committee that  
 25 decided on promotion of students?

1 A. Uh-huh.  
 2 Q. The second sentence says, "Membership in  
 3 ESP's buying coalition is signified by one diagonal  
 4 stripe on the right side of the scarf."  
 5 A. Yes.  
 6 Q. What is "ESP's buying coalition"?  
 7 A. It is no longer in existence; but it was an  
 8 optional program where people could get food,  
 9 vitamins, things like that. And it was a membership  
 10 in a store.  
 11 Q. When was -- at what periods in time was that  
 12 buying coalition in existence?  
 13 A. I think it ended 1999. It might be a little  
 14 later but not much.  
 15 Q. Okay --  
 16 A. In fact, I'm pretty sure it was 1999.  
 17 Q. This revision is dated 12/2000. Is it  
 18 possible it was still in existence at that time?  
 19 A. I don't think so. I think a lot of these  
 20 materials were never updated.  
 21 Q. Who made the decision to discontinue the  
 22 buying coalition?  
 23 A. The person who headed up the buying coalition  
 24 severed the relationship with us so that there was  
 25 no more buying coalition.

1 A. I don't know.  
 2 Q. Were you on that committee?  
 3 A. No.  
 4 Q. How did you know what the procedure was for  
 5 promotion?  
 6 A. Well, I created them initially. I don't know  
 7 with specificity now what is the case, but it is  
 8 important that it's more of a democratic process.  
 9 Q. Okay. Have you ever been on a committee that  
 10 decides on promotion?  
 11 A. No.  
 12 Q. Do you know if Nancy Salzman has?  
 13 A. Nancy does decide ultimately certain high  
 14 level promotions, but that is also decided by a  
 15 committee that makes recommendations to her. I  
 16 don't know if -- I don't think she's on the  
 17 committee, per se.  
 18 Q. And as you sit here today, do you know the  
 19 names of anyone who has been on that committee at  
 20 any point in time?  
 21 A. I would think Barbara Jeske was, I would  
 22 think Pam Cafritz was, Lauren Salzman probably.  
 23 Q. Okay. Looking at the last section -- strike  
 24 that.  
 25 Do they make the decisions based on rules for

Page 157

1 promotion that you had originally drafted or  
 2 created?  
 3 A. No. I think the -- those were the initial  
 4 rules or guidelines. I think they've evolved, so  
 5 I don't know all the criteria they use.  
 6 Q. Okay. The last sentence of Paragraph 4 says,  
 7 "I am the highest rank in the structure and I have  
 8 been overridden numerous times and always can be."  
 9 When you say you're the highest rank in the  
 10 structure, what do you mean?  
 11 A. I wear a double white long sash. So with  
 12 respect to who has, if you will, the most knowledge  
 13 relating to the ESP philosophy and who has the  
 14 ultimate authority to explain that philosophy or  
 15 answer the questions, I am the highest rank.  
 16 Q. Okay. Can you give me examples of when  
 17 you've been overridden in decision-making at NXIVM?  
 18 A. I could probably give you a number of  
 19 examples.  
 20 Q. Okay.  
 21 THE WITNESS: What do I do if they  
 22 involve a legal case?  
 23 MR. CAMPION: If they involve a legal  
 24 case, you're not going to do it. You and I will  
 25 discuss it. I'll make a determination as to whether

Page 158

1 a privilege is involved, and then you can supplement  
 2 the answer tomorrow if I conclude that privilege is  
 3 not involved; but as to matters which do not relate  
 4 to the legal case, please answer.  
 5 THE WITNESS: Okay.  
 6 Continuing...  
 7 A. There have been in the past either people  
 8 that I thought were good for a promotion from what  
 9 I had seen and how they had spoken and things like  
 10 that or not, and there have been instances where  
 11 it's gone both ways. The way the NXIVM business is  
 12 run, the systems that I suggest often are either not  
 13 done or not executed.  
 14 Q. Are they rejected, or they're just not  
 15 implemented?  
 16 A. Both. They're rejected and sometimes not  
 17 implemented.  
 18 Q. Can you think of an example of a suggestion  
 19 you've made that's been rejected?  
 20 A. Yeah. I had thought that it would be good to  
 21 have a way of having the phone tree, using a system  
 22 of personal contacts where we have people calling  
 23 through the whole organization and then having a  
 24 series of feedback loops to know if the data had  
 25 gone through; and I think it turned out to be

Page 159

1 unfeasible. It's not done. There is a phone tree,  
 2 but they don't do it the way I had thought it would  
 3 be done.  
 4 Q. And was that because someone concluded it  
 5 could not be implemented?  
 6 A. I don't know exactly.  
 7 Q. Who was the person who told you it was  
 8 infeasible?  
 9 A. I think I was told by a number of people.  
 10 Q. Can you think of any other examples in  
 11 which your decisions have been rejected or your  
 12 suggestions have been rejected?  
 13 A. Yeah. There have been times where I  
 14 suggested that we might have either a certain type  
 15 of curriculum or an event at a certain time. For  
 16 example, I had thought it would be good to have a  
 17 winter festival this -- this year and really thought  
 18 that was important; but the people within NXIVM had  
 19 other priorities, and it was not done.  
 20 And at first, it was rejected, and then they  
 21 said, well, maybe we could try to do it later; and  
 22 then they decided it was unfeasible.  
 23 Q. Do they say how it was unfeasible?  
 24 A. They felt because of the Dalai Lama event --  
 25 we have the Dalai Lama coming and spending five days

Page 160

1 with us -- that the preparations that they need to  
 2 do, there have to be ethical boards put together  
 3 because there are a series of panels in different  
 4 areas that are doing public discussions. And also  
 5 because of some of the situations that are going on  
 6 in Mexico, I founded a peace movement in Mexico  
 7 because of the situation. And I have a number of  
 8 friends that have been adversely affected. People  
 9 are kidnapped. I have one friend who was kidnapped,  
 10 held at knifepoint, another friend who in the past  
 11 had both of their ears cut off and one of their  
 12 fingers. And this is somewhat of a common  
 13 occurrence in Mexico, and it's come to the point  
 14 where I think there's a lot of civil unrest. So the  
 15 people in Mexico cannot devote the time to doing  
 16 something like a winter fest when there's other  
 17 important things.  
 18 Q. The -- you indicated that the Dalai Lama was  
 19 going to be staying with NXIVM for five days?  
 20 A. No. He's doing an event with us.  
 21 Q. What kind -- where is the event being held?  
 22 A. We're not exactly sure. Part of it's being  
 23 held in an arena called The Times-Union Arena.  
 24 Q. Is that in Albany?  
 25 A. Yes. The rest is somewhere near Albany.



1 We're not sure of the settings because we are having  
 2 a series of panels doing not only ethics discussions  
 3 but ethical plan implementations.  
 4 Q. Are you co -- are you sponsoring the event,  
 5 or what's the nature of your involvement and the  
 6 Dalai Lama's involvement?  
 7 A. I'm the ideological founder, and the Dalai  
 8 Lama sent a representative to examine us and go  
 9 through our curriculum; and what we offer on the  
 10 basis of ethics and things like that were something  
 11 that this representative felt was extremely  
 12 valuable.  
 13 Q. What was the name of the representative of  
 14 the Dalai Lama that came and --  
 15 A. We call him Lama Tenzin. He's the personal  
 16 peace emissary of the Dalai Lama.  
 17 Q. Did he sign a confidentiality agreement?  
 18 A. I believe so. I'm not positive.  
 19 Q. And when are these events taking place?  
 20 A. April 19th is the large public event. We  
 21 have trainings to train in the ethical tools before  
 22 that point. April 18th I believe is when the first  
 23 panel starts.  
 24 MR. KOFMAN: This might be a good time  
 25 to break.

1 J U R A T  
 2 I, KEITH A. RANIERE, do hereby  
 3 certify that I have read the foregoing transcript of  
 4 my testimony taken on March 11, 2009, and have  
 5 signed it subject to the following changes:  
 6 PAGE LINE CORRECTION  
 7  
 8  
 9  
 10  
 11  
 12  
 13  
 14  
 15  
 16  
 17  
 18  
 19  
 20  
 21 DATE: \_\_\_\_\_  
 22 Sworn and subscribed to before me on this day  
 23 of  
 24 NOTARY PUBLIC  
 25 \_\_\_\_\_.

1 MR. CAMPION: Just about 6:00, anyway.  
 2 MR. KOFMAN: Yeah.  
 3 MR. CAMPION: Are you all agreeable to  
 4 starting at 9:30 tomorrow morning?  
 5 MR. KOFMAN: Happy to.  
 6 THE WITNESS: Fine with me. I have my  
 7 homework.  
 8 MR. KOFMAN: You'll take that?  
 9 THE WITNESS: I will.  
 10 MR. KOFMAN: Thank you.  
 11 Thank you very much.  
 12 THE VIDEOGRAPHER: Going off the record  
 13 at 5:56.  
 14  
 15 (Witness excused.)  
 16 (The deposition was adjourned for the  
 17 day at 5:56 p.m.)  
 18  
 19  
 20  
 21  
 22  
 23  
 24  
 25

1 C E R T I F I C A T E  
 2  
 3  
 4 I, CHERYL McGANN, a Certified Court  
 5 Reporter and Certified Realtime Reporter of the  
 6 State of New Jersey, authorized to administer  
 7 oaths pursuant to R.S.41:2-2, do hereby certify  
 8 that prior to the commencement of the examination,  
 9 the witness was sworn by me to testify to the truth,  
 10 the whole truth, and nothing but the truth.  
 11 I DO FURTHER CERTIFY that the foregoing  
 12 is a true and accurate transcript of the testimony  
 13 that was taken stenographically by and before me at  
 14 the time, place, and on the date hereinbefore set  
 15 forth.  
 16 I DO FURTHER CERTIFY that I am neither  
 17 a relative nor employee nor attorney nor counsel  
 18 of any the parties to this action and that I am  
 19 not interested in the action.  
 20  
 21  
 22  
 23 CHERYL McGANN  
 24 C.C.R. License No. XI000918

<b>A</b>				
<b>aaron</b>	10:22 76:2 98:16	161:17	25:3	<b>april</b>
14:17 42:21,24	117:16,16 140:2	<b>agreements</b>	<b>answering</b>	161:20,22
43:15	<b>address</b>	110:7	9:24 25:12	<b>ar</b>
<b>ability</b>	102:23	<b>ahead</b>	<b>answers</b>	139:6
12:5 19:16 140:1	<b>adelman</b>	55:8 78:15 125:16	9:19 23:3 140:3	<b>area</b>
<b>able</b>	3:18 6:19	144:7	<b>anthony</b>	36:10,13,18
63:24 81:18	<b>adequately</b>	<b>alan</b>	3:9 6:14	<b>areas</b>
110:14 123:10	26:18	4:3	<b>anybody</b>	51:24 62:24 160:4
130:1 134:20	<b>adjourned</b>	<b>albany</b>	41:10 42:17 68:25	<b>arena</b>
<b>aboveentitled</b>	162:16	36:13,18 42:24	72:20 143:9	160:23,23
2:10	<b>administer</b>	140:21 160:24,25	<b>anyplace</b>	<b>argument</b>
<b>acceptable</b>	164:6	<b>allegedly</b>	81:13	110:10
8:4	<b>advanced</b>	41:21	<b>anyway</b>	<b>arisen</b>
<b>access</b>	149:15 153:13,16	<b>allotted</b>	162:1	20:10
79:24 80:2 81:13	<b>advantage</b>	129:21	<b>apologize</b>	<b>arlen</b>
<b>accompanied</b>	112:20 128:16	<b>allowed</b>	19:12 22:18 90:16	38:17,24 39:7
138:20	130:3	29:15,19 41:25	150:10	40:4 47:18 48:8
<b>account</b>	<b>adversely</b>	138:10,12,19	<b>apologized</b>	92:3 95:3 137:8
80:4,6,6,7	160:8	148:6	19:19	137:15 142:12,25
<b>accounts</b>	<b>advice</b>	<b>allowing</b>	<b>appear</b>	<b>arrangement</b>
63:22,25 79:19,20	28:11 45:8 47:21	61:8	12:24	105:22 127:18
79:24 80:3,13	47:22,23	<b>alternatives</b>	<b>appeared</b>	<b>arranging</b>
81:6,8	<b>advise</b>	96:6	115:9,10,17	150:3,12
<b>accurate</b>	10:14	<b>amend</b>	<b>appears</b>	<b>art</b>
11:21 12:15 67:13	<b>advised</b>	26:1	40:5 67:3 77:24	139:6
139:22,23 164:12	41:6	<b>amount</b>	97:17 107:19	<b>article</b>
<b>accurately</b>	<b>affect</b>	100:25 102:11	120:25 144:22	64:11,12,15,24
104:18	110:14	<b>analysis</b>	150:2	65:10 107:17,23
<b>acknowledge</b>	<b>affidavit</b>	4:20 64:23 65:10	<b>application</b>	107:25 108:16,24
115:11,18	4:9 42:25 43:3,6	65:14 146:15,21	4:18 7:9 91:3,6,7	109:20,22 110:2,3
<b>act</b>	66:11,18,23 67:22	<b>analyze</b>	92:2,5,10 94:21	110:24 111:14
46:10 112:22,24	79:1 148:15	64:21	141:12,19 144:19	113:8 114:6,8,9
<b>acting</b>	155:19	<b>analyzing</b>	144:22	114:11,12 117:6
88:15	<b>affirmed</b>	64:23 84:1	<b>applied</b>	117:23 122:24
<b>action</b>	42:25	<b>anger</b>	4:16 126:10	132:9 133:16
91:9 164:18,19	<b>ago</b>	111:1,20,22 112:5	131:13	135:21 136:2,7,17
<b>activities</b>	54:8 77:23 82:21	112:9,9,21 113:3	<b>apply</b>	136:19 139:2
26:20	105:3,4 132:6	113:4 117:9	90:25	141:5,7 146:20
<b>actual</b>	<b>agree</b>	<b>anna</b>	<b>appreciate</b>	147:9,18 148:18
27:8 124:2 128:1	40:8 79:3 147:23	1:14 2:2	89:15	<b>articles</b>
<b>actualized</b>	<b>agreeable</b>	<b>answer</b>	<b>approached</b>	55:17 56:5,11,15
98:24	162:3	10:7 25:5 26:18	24:19	61:21,24 62:8,12
<b>add</b>	<b>agreed</b>	28:13 37:22 46:5	<b>appropriate</b>	64:10,22 65:4
29:9 76:6	10:16 105:23	78:15 87:6,20	132:13	106:8 107:19
<b>added</b>	<b>agreement</b>	92:6 115:13	<b>approve</b>	115:2 117:25
96:8	19:14 20:5,11,21	125:11 129:10	12:2	139:7 147:1
<b>addition</b>	22:14,19,24 24:13	132:14 134:11	<b>approved</b>	<b>arts</b>
9:21 108:11	28:5 39:6 40:2	149:4 157:15	59:1,2 67:8	84:2 95:23
	48:3,8 138:6,18	158:2,4	<b>approximately</b>	<b>ascertain</b>
		<b>answered</b>	9:1 58:2 147:6	43:18

<b>aside</b> 103:6 146:12	<b>attorney</b> 19:17 64:19,21 94:4 164:17	9:17	<b>becoming</b> 30:19	<b>believed</b> 38:3 43:1 75:5 95:13 116:9
<b>asked</b> 12:2 20:22 25:5 34:20 37:8 39:1 47:18 63:9,19,22 64:4,4,5 72:10 79:19 80:23 136:14 143:6 145:16	<b>attorneyclient</b> 91:19 92:14	<b>ayn</b> 89:12,15 96:11,12	<b>beg</b> 122:18 124:10	<b>believer</b> 21:19 155:17
<b>asking</b> 9:18 24:9 58:8 64:8 90:18 92:16	<b>attorneys</b> 2:24 3:7,12,17,21 6:11 38:11 46:21 61:12 66:5 67:10 67:16 81:17 142:8 142:10	<hr/> <b>B</b> <hr/>	<b>beginning</b> 20:6 47:14 82:3 104:20,21 105:24 115:3 116:23 130:15	<b>believes</b> 73:11 134:16
<b>aspects</b> 128:23 153:14,16	<b>audiotaping</b> 137:3	<b>bachelor</b> 72:2	<b>begs</b> 124:10	<b>believing</b> 21:20
<b>assessment</b> 46:14	<b>audio</b> 137:3	<b>back</b> 23:1 24:4,16 30:2 39:19 70:22 74:4 74:16 76:10 80:22 81:18 82:13 87:7 87:10 91:15 108:22 115:14,15 117:6 118:16,20 119:2 121:17 125:11 126:4,15 133:7 144:19,22 146:2 155:18,19	<b>behalf</b> 6:19 7:6 10:16 102:16,22	<b>belonging</b> 107:23
<b>assign</b> 97:18,22	<b>august</b> 38:6 69:12 93:16 148:14 155:19	<b>bad</b> 59:24 60:5 61:16 67:25	<b>behavior</b> 88:11,13	<b>benefitting</b> 110:13
<b>assignment</b> 4:12 96:25 98:13 99:1 123:2	<b>author</b> 85:18,21 103:11 103:14,18	<b>barbara</b> 156:21	<b>believe</b> 9:11 13:24 14:12 19:10 20:12 21:4 21:18,20,21,24 22:6 31:7,14 33:16 38:9 40:1 40:16,17 43:16 44:24,25 45:21 47:22,24 50:15 56:18,21 57:2 58:16 61:15 62:20 65:2,3 67:7 68:6 68:23 69:8,21 73:22 74:15,24 75:10,15,17 76:1 76:4 77:3 80:7,10 88:7 90:16 91:4 94:3 96:7,15,19 97:21 98:23 100:12 101:24 105:21 106:25 107:16 113:5,9 115:4,25 116:11 117:21 119:4 129:6 130:15 134:17 135:1 136:22 138:9,17 138:17 139:8,18 141:1 142:8 147:3 147:12,14 149:12 152:8 153:1,18,22 155:6 161:18,22	<b>bergeron</b> 89:8
<b>assist</b> 85:24,25	<b>authored</b> 147:9	<b>barry</b> 2:21 7:3	<b>belief</b> 37:8 134:13	<b>best</b> 13:1 15:20 59:19 60:7 74:8 92:24 123:12 140:1
<b>assistance</b> 86:8	<b>authority</b> 110:6 124:18 157:14	<b>based</b> 77:23 78:2,11 150:21 155:21 156:25	<b>believe</b> 9:11 13:24 14:12 19:10 20:12 21:4 21:18,20,21,24 22:6 31:7,14 33:16 38:9 40:1 40:16,17 43:16 44:24,25 45:21 47:22,24 50:15 56:18,21 57:2 58:16 61:15 62:20 65:2,3 67:7 68:6 68:23 69:8,21 73:22 74:15,24 75:10,15,17 76:1 76:4 77:3 80:7,10 88:7 90:16 91:4 94:3 96:7,15,19 97:21 98:23 100:12 101:24 105:21 106:25 107:16 113:5,9 115:4,25 116:11 117:21 119:4 129:6 130:15 134:17 135:1 136:22 138:9,17 138:17 139:8,18 141:1 142:8 147:3 147:12,14 149:12 152:8 153:1,18,22 155:6 161:18,22	<b>better</b> 12:5
<b>associates</b> 29:22,25	<b>authorized</b> 164:6	<b>basically</b> 147:25	<b>believe</b> 9:11 13:24 14:12 19:10 20:12 21:4 21:18,20,21,24 22:6 31:7,14 33:16 38:9 40:1 40:16,17 43:16 44:24,25 45:21 47:22,24 50:15 56:18,21 57:2 58:16 61:15 62:20 65:2,3 67:7 68:6 68:23 69:8,21 73:22 74:15,24 75:10,15,17 76:1 76:4 77:3 80:7,10 88:7 90:16 91:4 94:3 96:7,15,19 97:21 98:23 100:12 101:24 105:21 106:25 107:16 113:5,9 115:4,25 116:11 117:21 119:4 129:6 130:15 134:17 135:1 136:22 138:9,17 138:17 139:8,18 141:1 142:8 147:3 147:12,14 149:12 152:8 153:1,18,22 155:6 161:18,22	<b>biddle</b> 2:14 3:3 6:25
<b>assume</b> 7:11 32:1,7 46:2 62:22	<b>authorship</b> 104:5	<b>basis</b> 22:15 25:25 27:6 44:21,22 46:23 47:25 49:7 68:7 68:13 69:6 116:3 150:15 161:10	<b>behavior</b> 88:11,13	<b>big</b> 126:25
<b>assuming</b> 86:21 87:12 147:8	<b>avalanche</b> 67:25	<b>barbara</b> 156:21	<b>belief</b> 37:8 134:13	<b>bill</b> 101:9
<b>assumption</b> 77:15 78:1	<b>avenue</b> 1:23 3:10,15	<b>barry</b> 2:21 7:3	<b>believe</b> 9:11 13:24 14:12 19:10 20:12 21:4 21:18,20,21,24 22:6 31:7,14 33:16 38:9 40:1 40:16,17 43:16 44:24,25 45:21 47:22,24 50:15 56:18,21 57:2 58:16 61:15 62:20 65:2,3 67:7 68:6 68:23 69:8,21 73:22 74:15,24 75:10,15,17 76:1 76:4 77:3 80:7,10 88:7 90:16 91:4 94:3 96:7,15,19 97:21 98:23 100:12 101:24 105:21 106:25 107:16 113:5,9 115:4,25 116:11 117:21 119:4 129:6 130:15 134:17 135:1 136:22 138:9,17 138:17 139:8,18 141:1 142:8 147:3 147:12,14 149:12 152:8 153:1,18,22 155:6 161:18,22	<b>binoculars</b> 144:8
<b>athletics</b> 84:2	<b>aviv</b> 1:14 2:2 3:21 6:20	<b>based</b> 77:23 78:2,11 150:21 155:21 156:25	<b>behavior</b> 88:11,13	<b>biographies</b> 11:14,17,18
<b>attached</b> 4:25	<b>aware</b> 13:21,25 14:16 20:4,9 29:20 36:8 36:11 43:24 44:3 45:2 50:5,7 76:12 91:12 94:20 113:6 115:22	<b>basically</b> 147:25	<b>believe</b> 9:11 13:24 14:12 19:10 20:12 21:4 21:18,20,21,24 22:6 31:7,14 33:16 38:9 40:1 40:16,17 43:16 44:24,25 45:21 47:22,24 50:15 56:18,21 57:2 58:16 61:15 62:20 65:2,3 67:7 68:6 68:23 69:8,21 73:22 74:15,24 75:10,15,17 76:1 76:4 77:3 80:7,10 88:7 90:16 91:4 94:3 96:7,15,19 97:21 98:23 100:12 101:24 105:21 106:25 107:16 113:5,9 115:4,25 116:11 117:21 119:4 129:6 130:15 134:17 135:1 136:22 138:9,17 138:17 139:8,18 141:1 142:8 147:3 147:12,14 149:12 152:8 153:1,18,22 155:6 161:18,22	<b>biography</b> 4:6 6:1 11:11,12 11:23
<b>attend</b> 14:22 17:19 24:1	<b>awhile</b>	<b>bates</b> 4:8,11,12,16,19 4:21,22,24 6:3 11:3 93:9,14,15 96:25 97:14 126:11 133:17 141:13,17 146:16 149:20 152:12	<b>behavior</b> 88:11,13	<b>birthday</b> 52:2
<b>attended</b> 16:11 83:2,7		<b>basis</b> 22:15 25:25 27:6 44:21,22 46:23 47:25 49:7 68:7 68:13 69:6 116:3 150:15 161:10	<b>believe</b> 9:11 13:24 14:12 19:10 20:12 21:4 21:18,20,21,24 22:6 31:7,14 33:16 38:9 40:1 40:16,17 43:16 44:24,25 45:21 47:22,24 50:15 56:18,21 57:2 58:16 61:15 62:20 65:2,3 67:7 68:6 68:23 69:8,21 73:22 74:15,24 75:10,15,17 76:1 76:4 77:3 80:7,10 88:7 90:16 91:4 94:3 96:7,15,19 97:21 98:23 100:12 101:24 105:21 106:25 107:16 113:5,9 115:4,25 116:11 117:21 119:4 129:6 130:15 134:17 135:1 136:22 138:9,17 138:17 139:8,18 141:1 142:8 147:3 147:12,14 149:12 152:8 153:1,18,22 155:6 161:18,22	<b>bit</b> 40:21 49:1 80:22 90:22 119:5,6,7 135:20 136:10
<b>attending</b> 15:4,9 25:11		<b>bears</b> 93:14,15	<b>behavior</b> 88:11,13	<b>blackberries</b> 51:14
<b>attention</b> 24:11,15 28:8 35:2,3 37:17 55:16,20 94:7,12 153:7			<b>behavior</b> 88:11,13	<b>blocks</b> 28:1
			<b>behavior</b> 88:11,13	<b>blow</b> 145:9
			<b>behavior</b> 88:11,13	<b>boards</b> 160:2
			<b>behavior</b> 88:11,13	<b>book</b> 41:18 83:20 89:2

89:3	68:19 71:25	<b>caption</b>	124:20	82:22,23,25
<b>books</b>	112:22 158:11	1:17	<b>check</b>	138:16,19 145:19
86:11,14,20	<b>buying</b>	<b>case</b>	41:10 58:18	<b>classes</b>
<b>bottom</b>	154:3,6,12,22,23	17:9 51:19,20	129:13 139:20	29:21 36:9 82:17
97:15 130:18	154:25 155:10,13	52:5 66:6 76:13	148:19,24 150:23	82:20 145:19
141:25 142:16	<b>buyline</b>	90:8 132:2 139:3	<b>checked</b>	<b>classifying</b>
<b>bought</b>	9:6,13 142:24	156:7 157:22,24	58:22 67:4	134:19
155:4	<b>C</b>	158:4	<b>checkin</b>	<b>cleaner</b>
<b>boxes</b>		<b>cases</b>	149:6 150:15	9:24
62:24	<b>cafritz</b>	61:2 119:22	152:4	<b>clear</b>
<b>boy</b>	156:22	<b>casual</b>	<b>checking</b>	49:5 78:8 106:22
94:14	<b>call</b>	43:13	133:11	126:16
<b>break</b>	29:16 47:24 48:24	<b>cause</b>	<b>checkins</b>	<b>clearer</b>
10:9,11 19:8 40:7	55:4,13 56:20	14:3 31:13 61:4	149:16 150:18	145:9 146:2
40:9 47:10,17	83:4,21 89:14	64:7 80:19 111:12	<b>cheryl</b>	<b>client</b>
79:8,13 81:19	99:4 124:25	124:9 146:3	2:11 164:4,22	11:4 24:19 65:22
92:23 121:11	135:18 139:12,17	<b>center</b>	<b>child</b>	66:2
125:23 161:25	161:15	1:23 2:23 18:12	71:11,13,14,17,22	<b>clients</b>
<b>breaker</b>	<b>called</b>	18:13 138:11,21	72:10,11	6:12
130:24	28:11 82:14 88:21	<b>certain</b>	<b>chisels</b>	<b>clifton</b>
<b>breaking</b>	88:25 95:10,22,22	30:10 59:18 63:19	128:19	8:10 155:8
29:4	95:25 99:19	67:12 68:19 77:24	<b>choice</b>	<b>club</b>
<b>breaks</b>	123:16 124:21	84:22 88:11 90:2	96:10,14	96:1
79:7 129:22 130:3	127:4 160:23	100:25 102:11	<b>choose</b>	<b>coach</b>
<b>brief</b>	<b>calling</b>	115:8 128:7 143:5	7:24 120:1 145:12	30:10,14,15,19,21
148:19	122:16 158:22	153:4 156:13	151:14,19,21,22	31:12,14,20 32:4
<b>bring</b>	<b>calls</b>	159:14,15	151:25 152:1,3	32:5,7,9 33:2
45:14 144:16	45:22 76:22	<b>certainly</b>	<b>church</b>	95:18 148:25
145:9 146:2 148:5	123:17 124:22	37:9 67:7 91:22	83:3,8,11 88:6	150:14
<b>bringing</b>	148:19	110:19 112:22	<b>circle</b>	<b>coaches</b>
28:8 38:7,21,25	<b>campion</b>	116:12 121:3	111:4,4,9,12	30:25 31:1,4 33:7
<b>broad</b>	3:5 6:24,24 38:13	<b>certification</b>	<b>circled</b>	33:15 148:20
134:9	38:16 39:8,18,24	69:13	144:10	150:23,25 153:14
<b>broadway</b>	40:6 47:11 48:9	<b>certified</b>	<b>cited</b>	153:22
3:19	48:17 78:13 79:8	2:12,12 164:4,5	90:6	<b>coaching</b>
<b>bronfman</b>	79:11,14 81:20	<b>certify</b>	<b>city</b>	150:4,13
139:2	91:20 92:6,15,20	163:3 164:7,11,16	36:10 71:18	<b>coalition</b>
<b>brother</b>	93:1 97:9 105:21	<b>change</b>	<b>civil</b>	154:3,6,12,22,23
44:8,9,9,13	106:15 108:20	75:22 118:7 133:4	160:14	154:25 155:11,14
<b>brought</b>	109:3,14 120:23	150:21	<b>claimed</b>	<b>coincide</b>
24:10,14,15 28:15	121:7,9,13,19,24	<b>changed</b>	53:7	52:2
35:1,3 37:14,17	123:12 125:22,24	25:16 78:11,19	<b>claims</b>	<b>collected</b>
38:6 53:5	127:17 133:15	79:2	46:4 53:5 110:4	63:7
<b>building</b>	144:7,10,15	<b>changes</b>	<b>clarification</b>	<b>column</b>
25:4	147:20 148:4,10	33:13,14 67:15	118:19 119:16	12:24
<b>bunch</b>	157:23 162:1,3	143:7 163:5	<b>clarifications</b>	<b>com</b>
96:6	<b>campus</b>	<b>characterize</b>	120:11	80:1,11
<b>business</b>	2:15 3:5	85:3 135:17	<b>clarify</b>	<b>come</b>
36:2,3 39:25	<b>cancellation</b>	151:11	140:24	21:12 31:11 40:11
49:11 52:13 53:14	144:21	<b>characterizing</b>	<b>class</b>	49:21 51:25 54:8

55:15,20 56:4 60:20,23 71:19 72:14 94:7,12 95:10 104:13 145:18 160:13 <b>comes</b> 16:7 89:7 <b>comfortable</b> 59:5 <b>coming</b> 19:13 51:14 100:24 159:25 <b>commencement</b> 164:8 <b>commencing</b> 2:16 <b>comment</b> 42:13 78:7 <b>commenting</b> 129:8 <b>comments</b> 122:9 <b>committed</b> 86:18 87:2,18 135:14 <b>committee</b> 155:21,22,24 156:2,9,15,17,19 <b>commodities</b> 50:19 <b>common</b> 23:25 24:1 52:1 134:13,21 135:4 160:12 <b>communication</b> 94:25 140:2 <b>communities</b> 134:24 <b>community</b> 71:12 72:2,5 <b>company</b> 142:7,10,20 <b>compassion</b> 112:24 <b>compel</b> 21:25 <b>compet</b> 124:13 <b>competitive</b> 112:20 128:16	130:3 <b>competitor</b> 113:12 129:25 143:22 145:20 <b>competitors</b> 112:20 113:6 <b>complete</b> 144:2 <b>completed</b> 32:24 33:3 <b>completely</b> 78:16 117:24 <b>complies</b> 66:21 109:11 <b>compulsory</b> 21:22 <b>computer</b> 62:3,5 81:15 <b>computeraided</b> 1:22 <b>computers</b> 81:10,17 <b>con</b> 41:13 74:6 108:17 108:25 <b>concealed</b> 46:2,3,9 <b>concep</b> 103:17 <b>concept</b> 112:14,18,19 119:4,5,6,7,8,9,13 128:19 134:1 <b>concepts</b> 85:7 103:17,18,20 103:23 104:8,19 106:5 112:12 152:24 <b>concern</b> 31:16 74:20 <b>concerned</b> 19:14 74:17 <b>concerning</b> 20:10 117:9 148:18 <b>concerns</b> 115:5 <b>conclude</b> 158:2 <b>concluded</b>	159:4 <b>conclusion</b> 60:20,23 76:22 <b>conclusions</b> 77:25 94:5 <b>condition</b> 98:16 <b>conditions</b> 141:25 142:21,23 143:4,15,20 145:1 <b>conducting</b> 101:2 <b>confidence</b> 53:2,17 <b>confident</b> 54:23 <b>confidential</b> 1:18 4:7 6:3 7:7 7:19,23 8:6 16:18 43:17 54:23,25 71:9 <b>confidentiality</b> 8:3 10:15 20:5,11 20:20 22:14,24 24:13 28:5 105:22 110:7 127:18 138:6,18 161:17 <b>confirm</b> 101:17 <b>conflict</b> 16:19,20 29:18 71:16 76:8 111:2 111:22 112:6 <b>confuse</b> 124:8 <b>connection</b> 9:5,12 39:11 40:13 92:1 <b>consider</b> 12:14 20:24 21:17 22:19 28:20,23 46:6,8 74:19 84:18 108:9,17,25 109:23 111:18 114:11,19,21 120:16 128:25 141:5 <b>consideration</b> 61:3,7,10 98:10 <b>considerations</b>	60:10,12 <b>considered</b> 60:15 72:1 126:18 134:24 139:24 141:7 <b>consistency</b> 128:14 <b>consisting</b> 4:9 66:12 <b>constitutes</b> 108:5 122:4 145:15 <b>construction</b> 119:13 <b>constructions</b> 111:15 <b>consult</b> 24:24 29:4 86:6 89:12,14 147:25 <b>consulted</b> 24:4 28:4 37:7,14 37:19 38:7 86:14 <b>consumers</b> 9:6,13 142:23 <b>contact</b> 151:5,12,17 <b>contacted</b> 92:5 <b>contacts</b> 158:22 <b>contain</b> 106:19 108:16,24 109:22 114:20,21 125:7 130:12 131:5 <b>contained</b> 103:21 112:8 114:6,8,9,10 117:8 125:18 129:11 <b>containing</b> 132:3 <b>contains</b> 67:23 107:23 108:1 125:13 129:15 131:24 132:5 <b>contemplated</b> 153:19 <b>contend</b>	132:21 <b>content</b> 76:19 77:1 127:12 127:23 128:21 130:21 <b>contention</b> 68:7 76:18 134:3 <b>context</b> 46:11,12,13 49:19 <b>continue</b> 13:4 105:25 118:11 144:12 145:22 <b>continued</b> 1:17 2:1 3:2 82:12 <b>continuing</b> 119:21 125:17 144:18 158:6 <b>continuously</b> 35:22 <b>contractor</b> 102:2 <b>control</b> 77:13,16,17,19 120:23 121:2 <b>convenient</b> 10:11 <b>conversation</b> 18:24 19:1 22:7 34:6,17,21 38:15 39:3 40:18 42:14 43:19,22 44:1 45:4,6,9,17,21 46:9,10 74:25 139:13 <b>conversations</b> 38:10 42:9,11 43:14 44:25 69:11 70:9 72:8,21 73:1 74:6 75:19 78:12 88:22 139:5 <b>conveys</b> 133:19 <b>coowner</b> 102:25 <b>copies</b> 10:22 121:19 <b>copy</b> 46:21 47:7 48:7
--	--	--	---	---

95:6 125:25	<b>court</b>	12:23	<b>days</b>	<b>denial</b>
133:13 140:8	1:1 2:12 9:20	<b>current</b>	7:8,20 8:4,4	92:10
145:9 146:2	10:7 164:4	80:4	124:14 129:19	<b>denied</b>
149:25	<b>courtroom</b>	<b>currently</b>	130:2 159:25	41:20
<b>copyright</b>	13:10	100:8	160:19	<b>dennis</b>
142:17	<b>covered</b>	<b>curricula</b>	<b>debates</b>	141:3
<b>corp</b>	105:21 127:17	125:4	113:14	<b>depending</b>
2:25 8:17	<b>create</b>	<b>curriculum</b>	<b>decide</b>	45:23 111:14
<b>corporate</b>	52:18 53:8 87:24	27:16 28:1 30:22	92:24 136:15	<b>depends</b>
51:23	90:10 103:15	97:25 98:17 103:7	156:13	45:20 46:11
<b>corporation</b>	124:5,5 152:24	123:23 124:7,11	<b>decided</b>	<b>deposed</b>
1:3 2:5	<b>created</b>	127:25 128:2	71:16 155:25	76:13
<b>correct</b>	27:17 67:25 80:5	159:15 161:9	156:14 159:22	<b>deposition</b>
15:18 19:3 31:10	80:8 86:7,8	<b>cut</b>	<b>decides</b>	1:19 6:9 7:7 8:5
92:19 126:20	103:17 105:17	160:11	155:22 156:10	8:19,20,24 9:9,16
132:25 139:24	106:2,6 111:22	<b>cynic</b>	<b>decision</b>	9:17,22 10:13
<b>correction</b>	112:5 117:3 134:1	60:2,4	154:21	48:14,15,24 54:22
163:6	156:6 157:2		<b>decisionmaking</b>	76:16 105:24
<b>correctly</b>	<b>creating</b>	<b>D</b>	157:17	119:19 120:24
37:12 92:16	33:6 105:6	<b>daily</b>	<b>decisions</b>	162:16
<b>cough</b>	<b>creation</b>	148:19,24 149:6	156:25 159:11	<b>depositions</b>
97:3	84:22 86:15 105:9	149:16 150:15,18	<b>deeper</b>	9:5
<b>counsel</b>	106:2,11	150:23 151:5,13	117:20	<b>deprogrammer</b>
7:21 10:4,5,6,14	<b>creator</b>	151:17 152:4	<b>defendants</b>	56:21
10:22 48:13 91:21	85:20	<b>dalai</b>	1:9 2:7,25 6:4	<b>deprogramming</b>
93:1 105:23 109:4	<b>criteria</b>	159:24,25 160:18	66:13 93:10 97:2	56:19
120:23 164:17	4:15 126:9 131:13	161:6,7,14,16	107:7 126:12	<b>derive</b>
<b>counselor</b>	157:5	<b>damaged</b>	141:14 146:17	96:11 106:7
95:18	<b>critical</b>	122:11	149:22 152:13	117:12,13 118:1
<b>count</b>	4:20 146:15,21	<b>damages</b>	<b>define</b>	119:8,13
26:20	<b>critics</b>	120:3	53:20 54:2 76:23	<b>describe</b>
<b>counterclaimdef...</b>	114:1	<b>danzig</b>	84:20 106:23	126:22
1:16	<b>cross</b>	3:8 6:14,15	114:5 123:22	<b>described</b>
<b>counterclaimplai...</b>	4:2	<b>data</b>	131:25 132:9	40:20 105:9
1:11	<b>crossclaim</b>	84:1 158:24	134:6 147:17	<b>description</b>
<b>couple</b>	2:7,24	<b>date</b>	<b>definition</b>	4:5 119:9 134:19
47:9,18	<b>crossclaimants</b>	1:20 6:6 8:25	109:24 111:19	<b>designate</b>
<b>course</b>	2:3	57:6 69:13 142:15	123:13 126:19	7:10,22,25
14:13,15,16,19,20	<b>cult</b>	163:21 164:14	127:7,8 134:7,8	<b>designated</b>
14:22 26:23 27:6	133:18,22 134:6	<b>dated</b>	135:8,8	8:6
27:19 30:4,10	134:10,16,17,25	93:16 107:14	<b>degree</b>	<b>designed</b>
54:7 61:8 63:10	135:6,17	154:17	19:25 26:16 86:3	133:20
100:25 101:1	<b>cultlike</b>	<b>day</b>	86:5 112:23	<b>designing</b>
114:17 143:21	111:25 128:24	17:17,18 18:8	117:22 155:12	33:5
145:5,13 151:23	<b>cults</b>	20:2,9,15,19,19	<b>delay</b>	<b>desirability</b>
<b>courses</b>	128:23 134:4,15	21:2 22:8 29:1	19:19,20	38:24
27:20 53:22 54:3	134:15,22,23	102:9 123:15,15	<b>delineate</b>	<b>destroy</b>
54:11,11 85:14	<b>culture</b>	124:20,20 129:21	117:11	59:23 73:9,15,20
100:24 148:22	134:23	153:15 162:17	<b>democratic</b>	74:5,6,11 75:6,14
149:15	<b>curiosity</b>	163:22	156:8	76:9

<b>destroying</b> 74:4 76:10	122:21 125:4 160:3	<b>discovery</b> 11:5 80:22 81:3 93:14 97:14 101:10 141:17	<b>district</b> 1:1,1	81:14
<b>destructive</b> 135:19	<b>difficult</b> 43:18	<b>discredit</b> 67:24 68:2,8,14 68:21,25 69:20 74:9,11 75:6,14 75:25 76:4	<b>dmc</b> 1:5	<b>downstate</b> 36:11
<b>detail</b> 35:11 83:15	<b>difficulty</b> 145:25	<b>discredited</b> 68:12	<b>document</b> 4:6,12,14,22,24 6:1 10:21,24 11:3 11:4,7,10 12:1,20 13:6 30:13 48:6 66:17,22 67:6 92:17,21 93:13,19 93:21 96:23,25 97:8,9,12,14,16 97:18 107:5,12,13 109:4,7,9 117:8 121:4,6 126:8 131:11,15,17,23 141:16,22 144:2 146:4,20,20,24 147:13 148:13 149:20,24 152:11 152:16,20,22 153:8,23	<b>dr</b> 107:15
<b>details</b> 16:5,16 31:18 52:20	<b>dinner</b> 74:15 129:21	<b>discuss</b> 19:16 22:2 38:20 38:23 40:7,8 52:5 66:6 148:17 157:25	<b>document</b> 121:4,6 126:8 131:11,15,17,23 141:16,22 144:2 146:4,20,20,24 147:13 148:13 149:20,24 152:11 152:16,20,22 153:8,23	<b>draft</b> 67:5 75:21 86:14 142:5 143:6,9
<b>determination</b> 157:25	<b>direct</b> 4:2 8:13 24:9 82:12 132:3	<b>discredited</b> 68:12	<b>document</b> 121:4,6 126:8 131:11,15,17,23 141:16,22 144:2 146:4,20,20,24 147:13 148:13 149:20,24 152:11 152:16,20,22 153:8,23	<b>drafted</b> 67:7,9 86:18 90:18 142:9,10,14 142:19 157:1
<b>determine</b> 108:1 131:24 147:10	<b>directly</b> 11:8 17:21 18:24 31:6 44:12 120:20 145:17 152:22	<b>discuss</b> 19:16 22:2 38:20 38:23 40:7,8 52:5 66:6 148:17 157:25	<b>document</b> 121:4,6 126:8 131:11,15,17,23 141:16,22 144:2 146:4,20,20,24 147:13 148:13 149:20,24 152:11 152:16,20,22 153:8,23	<b>drafting</b> 142:6 143:1,3
<b>devalues</b> 133:19	<b>director</b> 99:21 100:5	<b>discussed</b> 10:15 14:11 19:11 50:2 61:11,17 83:13 105:13,14	<b>document</b> 121:4,6 126:8 131:11,15,17,23 141:16,22 144:2 146:4,20,20,24 147:13 148:13 149:20,24 152:11 152:16,20,22 153:8,23	<b>drafts</b> 90:14
<b>develop</b> 85:22 97:24,25 98:16,17	<b>disadvantage</b> 107:2 108:18 109:2 130:4	<b>discussing</b> 39:15,16,21,22 52:9	<b>document</b> 121:4,6 126:8 131:11,15,17,23 141:16,22 144:2 146:4,20,20,24 147:13 148:13 149:20,24 152:11 152:16,20,22 153:8,23	<b>drinker</b> 2:14 3:3 6:25
<b>developed</b> 90:17 103:20,21 112:11	<b>disadvantageous</b> 132:23	<b>discussion</b> 17:2 18:11 19:4,5 21:8,10,14 22:3 36:20,22 37:25 41:13 50:4 51:16 72:17 79:15 99:1 105:16 109:13 118:15 119:17 146:7	<b>document</b> 121:4,6 126:8 131:11,15,17,23 141:16,22 144:2 146:4,20,20,24 147:13 148:13 149:20,24 152:11 152:16,20,22 153:8,23	<b>drive</b> 2:15 3:5
<b>developer</b> 4:7 6:2	<b>disagree</b> 39:9	<b>discussing</b> 39:15,16,21,22 52:9	<b>document</b> 121:4,6 126:8 131:11,15,17,23 141:16,22 144:2 146:4,20,20,24 147:13 148:13 149:20,24 152:11 152:16,20,22 153:8,23	<b>duly</b> 8:11
<b>developing</b> 26:13,23 27:6 52:22 85:24 86:1 89:13 90:11	<b>discard</b> 140:15	<b>discussion</b> 17:2 18:11 19:4,5 21:8,10,14 22:3 36:20,22 37:25 41:13 50:4 51:16 72:17 79:15 99:1 105:16 109:13 118:15 119:17 146:7	<b>document</b> 121:4,6 126:8 131:11,15,17,23 141:16,22 144:2 146:4,20,20,24 147:13 148:13 149:20,24 152:11 152:16,20,22 153:8,23	<b>duties</b> 54:17
<b>develops</b> 134:25	<b>discarded</b> 140:16	<b>discussions</b> 17:4 20:19 22:9 33:21 36:24 42:16 42:20 49:23 50:8 57:8 58:4 160:4 161:2	<b>document</b> 121:4,6 126:8 131:11,15,17,23 141:16,22 144:2 146:4,20,20,24 147:13 148:13 149:20,24 152:11 152:16,20,22 153:8,23	<hr/> <b>E</b> <hr/>
<b>devote</b> 160:15	<b>discipline</b> 84:2	<b>disgraceful</b> 72:3	<b>document</b> 121:4,6 126:8 131:11,15,17,23 141:16,22 144:2 146:4,20,20,24 147:13 148:13 149:20,24 152:11 152:16,20,22 153:8,23	<b>early</b> 82:21
<b>devoted</b> 27:12	<b>disclaimer</b> 142:2	<b>disgraceful</b> 72:3	<b>document</b> 121:4,6 126:8 131:11,15,17,23 141:16,22 144:2 146:4,20,20,24 147:13 148:13 149:20,24 152:11 152:16,20,22 153:8,23	<b>earn</b> 102:5,6,8
<b>devoting</b> 25:7	<b>disclose</b> 120:19 131:1	<b>disgraceful</b> 72:3	<b>document</b> 121:4,6 126:8 131:11,15,17,23 141:16,22 144:2 146:4,20,20,24 147:13 148:13 149:20,24 152:11 152:16,20,22 153:8,23	<b>ears</b> 160:11
<b>diagonal</b> 154:3	<b>disclosed</b> 108:19 109:2 110:24 120:11,17 123:5 128:20 132:9,23 147:17	<b>disgraceful</b> 72:3	<b>document</b> 121:4,6 126:8 131:11,15,17,23 141:16,22 144:2 146:4,20,20,24 147:13 148:13 149:20,24 152:11 152:16,20,22 153:8,23	<b>easy</b> 125:15
<b>dialogue</b> 60:7	<b>disclosure</b> 120:12	<b>disgraceful</b> 72:3	<b>document</b> 121:4,6 126:8 131:11,15,17,23 141:16,22 144:2 146:4,20,20,24 147:13 148:13 149:20,24 152:11 152:16,20,22 153:8,23	<b>education</b> 23:4 51:25
<b>dianetics</b> 83:20 89:2	<b>discontent</b> 33:24 34:15 35:9 35:15	<b>disgraceful</b> 72:3	<b>document</b> 121:4,6 126:8 131:11,15,17,23 141:16,22 144:2 146:4,20,20,24 147:13 148:13 149:20,24 152:11 152:16,20,22 153:8,23	<b>educator</b> 15:25
<b>dictionary</b> 135:8	<b>discontinue</b> 154:21	<b>disgraceful</b> 72:3	<b>document</b> 121:4,6 126:8 131:11,15,17,23 141:16,22 144:2 146:4,20,20,24 147:13 148:13 149:20,24 152:11 152:16,20,22 153:8,23	<b>eight</b> 4:15 54:8,17,19 105:3 126:9 131:13
<b>difference</b> 60:1 69:22 111:15	<b>discover</b> 137:17	<b>disgraceful</b> 72:3	<b>document</b> 121:4,6 126:8 131:11,15,17,23 141:16,22 144:2 146:4,20,20,24 147:13 148:13 149:20,24 152:11 152:16,20,22 153:8,23	<b>eightday</b> 27:22
<b>different</b> 12:8 51:24 59:21 81:11 86:12 95:17 95:19 119:10	<b>discovered</b> 137:21	<b>disgraceful</b> 72:3	<b>document</b> 121:4,6 126:8 131:11,15,17,23 141:16,22 144:2 146:4,20,20,24 147:13 148:13 149:20,24 152:11 152:16,20,22 153:8,23	<b>either</b> 7:9 15:24 16:10 22:3 37:4 43:10 44:12 47:2 59:7 65:23 98:2 102:21 110:15 118:3

120:1 122:9,11 127:9 129:19 131:2 151:5,12,17 158:7,12 159:14 <b>elaborate</b> 59:15 <b>element</b> 134:21 <b>elements</b> 112:1 <b>elephant</b> 126:23 <b>elephants</b> 130:16,16 <b>eligible</b> 72:2 <b>elks</b> 96:1 <b>email</b> 63:22,25 64:4 79:19,20,24 80:9 80:11,13 81:6,8 <b>emails</b> 81:15 113:15,16 113:17,22 114:1 <b>embarrassment</b> 75:10 <b>embrace</b> 71:21 <b>emiliano</b> 139:1 <b>emissary</b> 161:16 <b>emotion</b> 88:16 <b>employed</b> 23:18,20,23 98:7 101:22,25 <b>employee</b> 99:24 164:17 <b>encourage</b> 155:13 <b>encouraged</b> 155:10 <b>ended</b> 50:18 140:2 154:13 <b>enrolling</b> 14:13 <b>enrollment</b>	4:18 141:12,18 <b>entails</b> 120:13 <b>entered</b> 119:19 <b>entire</b> 7:7 85:15,16 <b>entirety</b> 7:20,24,25 116:13 <b>entitled</b> 4:12,14 40:3 66:17 96:25 107:5 107:13 121:1 131:12 133:24 146:21 <b>es</b> 57:3 <b>esp</b> 4:14 57:3 68:11 107:6,14 112:1 122:17,19 123:17 123:21,23 124:22 127:13 128:22 129:17 145:13 153:14 155:3 157:13 <b>esps</b> 154:3,6 <b>esq</b> 2:21,22 3:4,5,8,9 3:14,15,19 <b>essay</b> 122:7 <b>essays</b> 119:10 <b>essential</b> 122:17,19 <b>estimate</b> 25:8,21 27:17 <b>estimated</b> 12:6 <b>eth</b> 100:18 <b>ethic</b> 29:5 <b>ethical</b> 21:23,24 22:1 46:10 58:1 59:13 99:19,21,24 100:3 100:6,13,15	101:25 102:3 160:2 161:3,21 <b>ethicist</b> 125:2 <b>ethics</b> 24:17 28:14,18,21 28:23 37:7 80:4 161:2,10 <b>ethos</b> 125:2 153:6 <b>evaluate</b> 52:18,19 57:10 58:5,14 59:6 61:8 <b>evaluates</b> 4:14 107:6,14 <b>evaluation</b> 108:15 <b>event</b> 159:15,24 160:20 160:21 161:4,20 <b>events</b> 83:7 161:19 <b>evolved</b> 33:12 157:4 <b>exactly</b> 16:25 17:12 30:20 36:1 104:15 136:8 138:13 159:6 160:22 <b>exalted</b> 96:2 <b>examination</b> 8:13 82:12 164:8 <b>examine</b> 161:8 <b>examined</b> 94:23 <b>example</b> 24:18 25:3 89:24 117:13,18 119:4 119:23 123:7 124:1 127:11 133:21 135:11 158:18 159:16 <b>examples</b> 12:4 157:16,19 159:10 <b>excerpts</b> 116:6 <b>excited</b>	19:21 <b>excuse</b> 118:6 133:3 145:3 <b>excused</b> 81:23 119:20 162:15 <b>executed</b> 158:13 <b>executive</b> 1:3 4:16,18,20 13:1 15:19 18:13 26:7 57:3 123:16 124:21,23,24 126:10 131:14 141:11 143:20 146:15,21 <b>exercise</b> 132:7,18 147:15 <b>exhibit</b> 4:5 6:4 66:13 93:10 97:2 107:7 111:5 126:12 141:14 146:18 149:22 152:13 <b>exhibits</b> 4:25 <b>exist</b> 137:6 <b>existed</b> 63:20 <b>existence</b> 40:2 154:7,12,18 <b>exists</b> 85:16 152:23 <b>expect</b> 8:5 <b>experience</b> 143:16,17 <b>experienced</b> 129:19 <b>expert</b> 57:10 58:4 111:12 <b>explain</b> 35:8 104:7 120:22 122:22 157:14 <b>explanation</b> 124:10 <b>explore</b> 112:25 113:1 <b>exposed</b>	30:11 <b>express</b> 30:21 <b>expressed</b> 19:13 91:13 112:15,18 <b>expressing</b> 74:20 <b>extent</b> 91:20 <b>extreme</b> 96:2 <b>extremely</b> 161:11 <hr/> <b>F</b> <hr/> <b>facebook</b> 80:6 <b>facets</b> 110:16 <b>facilitator</b> 30:12 32:6 <b>facility</b> 128:13 <b>fact</b> 32:6 42:17 74:2 124:14,15 129:7 130:1 132:24 154:16 <b>factchecking</b> 139:12 <b>factors</b> 46:7 <b>facts</b> 65:8 67:24 139:19 <b>factual</b> 64:13,16 110:21 <b>factually</b> 12:9 <b>fair</b> 101:18 <b>fairness</b> 109:3 <b>fall</b> 32:20 34:9,12 36:21 <b>fallacy</b> 111:14 <b>false</b> 67:24,25 119:6,24
---	---	---	--	---



122:10 131:3,3,8	18:8,10 20:2,8,19	136:9 153:2,24	20:20 22:13,23	71:3 141:12,19
<b>familiar</b>	21:2 22:8	159:20 161:22	28:5,6 29:1 65:19	<b>francos</b>
14:25 15:2 29:8	<b>file</b>	<b>firsthand</b>	76:21 78:13	16:2
29:24 30:2 40:23	91:5,5 140:12,13	69:5	141:21 143:24,25	<b>fraud</b>
58:20 92:17 108:4	<b>filed</b>	<b>fitzsimmons</b>	<b>formal</b>	145:15
108:6 128:24	38:23 59:15 60:16	1:23	27:8	<b>frequently</b>
135:11 152:16,20	80:13 136:20	<b>five</b>	<b>format</b>	24:4 49:17
<b>family</b>	<b>files</b>	79:12 95:15 96:5	127:13,24 128:21	<b>friedman</b>
40:19 68:19,19	47:5 63:4,5,6,9	96:7,8 159:25	<b>formerly</b>	3:18 6:18
69:18,25 71:25	64:2 95:6	160:19	1:3	<b>friend</b>
72:5	<b>filing</b>	<b>fiveday</b>	<b>forth</b>	54:9,12 72:12
<b>far</b>	60:11 62:18	129:20	10:8 91:15 164:15	88:23 89:5 160:9
12:9,16 39:14	<b>final</b>	<b>flintlock</b>	<b>fortify</b>	160:10
50:13 52:7 101:13	92:10	8:10	76:3	<b>friendly</b>
102:20	<b>finally</b>	<b>florham</b>	<b>forum</b>	35:24
<b>father</b>	10:9	2:15 3:6 6:8	24:9	<b>friends</b>
37:6,15 69:25	<b>find</b>	<b>florida</b>	<b>forums</b>	35:5,6,21 49:3
70:19 71:20,21,22	19:24 31:5 34:18	40:17	113:14	51:25 83:5,10
72:4 74:17,22	45:25 57:3 63:13	<b>flow</b>	<b>forward</b>	89:4 95:15 160:8
75:16	64:7 88:22 111:20	65:15	37:9 38:4	<b>full</b>
<b>favorable</b>	<b>fine</b>	<b>focus</b>	<b>found</b>	55:4,6,10 77:15
29:17	8:1 78:9 121:7,13	70:10 73:5	20:1 111:24 127:2	77:17,21 85:10
<b>fax</b>	123:11 162:6	<b>follow</b>	134:7	86:16 119:9
1:25 140:6,8,12	<b>fingers</b>	28:17 34:18 48:6	<b>foundation</b>	143:24
<b>faxed</b>	160:12	101:16 106:12	98:15,21,21 99:2	<b>function</b>
140:10,11,13,18	<b>finish</b>	120:21	99:4,7,11,14,17	18:17
<b>faxing</b>	9:23 10:6 121:4	<b>following</b>	99:20,22,25 100:3	<b>functional</b>
140:2	<b>finished</b>	1:17 39:19 87:10	100:6,15 101:25	96:3
<b>february</b>	121:1 133:10	108:22 115:15	102:3	<b>further</b>
107:14	147:19	163:5	<b>foundations</b>	16:7,14 20:18
<b>feedback</b>	<b>finishing</b>	<b>follows</b>	100:14	58:13 164:11,16
158:24	12:1	8:11 82:10	<b>founded</b>	<b>future</b>
<b>feel</b>	<b>firm</b>	<b>fong</b>	117:4 160:6	16:20 117:13
26:17 117:8	65:1 93:13,16	95:24	<b>founder</b>	
127:16 132:13,16	<b>firms</b>	<b>food</b>	4:7 6:2 23:2	<b>G</b>
<b>feeling</b>	64:21	154:8	96:15 161:7	<b>gateway</b>
130:23	<b>first</b>	<b>forbes</b>	<b>four</b>	2:23
<b>feels</b>	1:4 8:17 15:2	42:2 135:21 136:1	95:15 126:24	<b>gears</b>
45:23	23:22,23 29:1	136:6 139:2	129:10 142:1,1	135:20
<b>fees</b>	32:18 40:15 51:2	140:18 141:5,7	<b>fourth</b>	<b>general</b>
50:6,9,10	51:4 64:23 65:7	<b>force</b>	18:10	20:23 53:1 60:12
<b>felt</b>	67:22 80:18,20,21	24:18	<b>franco</b>	83:25
19:19 21:7 22:19	90:24 91:5 97:19	<b>foregoing</b>	1:8 3:12 4:19	<b>generally</b>
115:6 159:24	97:23,24 98:2,12	163:3 164:11	6:17 8:16 14:25	132:1
161:11	101:3,22 104:23	<b>forensic</b>	15:3,16,22 17:9	<b>generated</b>
<b>fest</b>	104:23 109:19	4:14 107:5,13	17:13,16 18:21	101:6
160:16	110:23 111:6,17	<b>forget</b>	19:2,12 20:3,5	<b>getting</b>
<b>festival</b>	111:25 114:11	12:18	22:8,9,13 28:4,22	52:20 80:11 117:6
159:17	121:3 128:17	<b>form</b>	30:15 31:12 36:22	<b>gift</b>
<b>fifth</b>	130:19 131:17	11:9 19:15,18	36:25 44:1 70:24	50:13 51:5,7

<b>gifts</b> 50:11 51:3,10	116:10,15 121:21 121:22 158:8,20	121:10	79:15 109:13 118:15 119:17	62:6,7
<b>girl</b> 71:19	159:16 161:24	<b>half</b> 19:7 44:8 102:24	146:7 160:10,21 160:23	<b>homework</b> 162:7
<b>gist</b> 74:24	<b>gotten</b> 59:11	<b>halfbrother</b> 15:15 34:20 44:9	<b>hell</b> 121:4	<b>honor</b> 80:4
<b>give</b> 12:4 28:11 44:15 53:1 58:10 59:24 60:8,9 64:18 79:12 89:24 92:24 104:1,12 112:19 119:9 121:17 132:16 138:3 157:16,18	<b>grand</b> 96:1	<b>halfway</b> 12:11	<b>help</b> 21:6 23:5 112:21 117:13	<b>honorably</b> 35:12
<b>given</b> 17:21 50:11 51:3 51:10 58:16 65:13 65:17,21,23,25 138:5	<b>grants</b> 102:18	<b>handle</b> 24:20 28:16 105:19	<b>helpful</b> 92:22 111:3 145:11	<b>hope</b> 60:6
<b>gives</b> 112:23 124:17	<b>great</b> 128:13,13	<b>handled</b> 30:23	<b>helps</b> 119:7,8	<b>hopes</b> 134:19
<b>giving</b> 129:22	<b>greater</b> 112:23	<b>happen</b> 59:9 143:7	<b>hereinbefore</b> 164:14	<b>hour</b> 19:7 123:15 124:20
<b>go</b> 12:18 19:16,22 22:22 24:16 34:14 38:4 53:10,13 55:8 60:6 78:15 95:3 98:15,18 110:10 111:13 120:21 125:16 130:18 132:17 144:7 161:8	<b>greatly</b> 89:14	<b>happened</b> 14:1 34:19 58:25 59:9,12 115:1,4	<b>high</b> 153:20 156:13	<b>hours</b> 25:6,15 26:10,15 27:11,12 129:13 129:21
<b>goes</b> 39:24 91:18	<b>gross</b> 128:2	<b>hard</b> 117:11	<b>higher</b> 153:18	<b>house</b> 63:5,15
<b>going</b> 8:19 9:8,15,18 31:13,22 37:9 52:6 54:21 55:13 69:24 70:19 90:22 106:10 109:8 120:4 126:15 133:3,6 148:11 155:18 157:24 160:5,19 162:12	<b>ground</b> 9:16	<b>harold</b> 3:8 6:13 8:15	<b>highest</b> 96:9 157:7,9,15	<b>hows</b> 52:6
<b>good</b> 8:14 29:9 57:12 57:12 60:4 89:20 95:13 115:6	<b>group</b> 95:15 114:1 123:15,18 124:21 124:24 125:1 133:19,20 134:20 135:14,19	<b>head</b> 113:12	<b>highly</b> 4:7 6:3 65:10	<b>human</b> 19:25 60:13 84:2 98:15
	<b>groups</b> 134:24	<b>headed</b> 4:6,22,24 6:1 149:20 152:11 154:23	<b>hint</b> 128:17	<b>hurt</b> 60:1
	<b>guard</b> 16:17	<b>headquarters</b> 3:10 18:16	<b>hired</b> 40:13 67:23 68:2 68:3,8,14,16,25 69:7,20,21,25 70:5,24 71:8 72:14 73:6,8,13 73:19,20 74:22 75:24 76:4 78:19 102:2	<b>hyland</b> 3:8 6:14,15
	<b>guess</b> 21:23 29:17 71:12 86:16 90:20 95:4 99:4	<b>hear</b> 20:16 58:13 73:16 73:19,24 115:13 117:14,14,15,15 125:10 138:1	<b>hires</b> 69:23	<b>I</b>
	<b>guessing</b> 19:6 91:8	<b>heard</b> 15:6 20:15 31:13 31:14 32:8 34:13 44:4,16 46:25 47:5 56:23 73:8 73:10,12 76:6 78:22,25 82:14 94:19	<b>hiring</b> 70:24 71:4	<b>idea</b> 61:16 95:13
	<b>guidelines</b> 24:20,21 157:4	<b>hears</b> 117:12	<b>historical</b> 134:22	<b>identification</b> 4:5 6:5 66:14 93:11 97:2 107:7 126:13 141:14 146:18 149:22 152:14
	<b>guilty</b> 130:23	<b>held</b> 2:13 7:19 51:16	<b>hochman</b> 55:17 61:21,24 64:6,10,12 107:15 148:18	<b>identified</b> 117:9
	<b>guinness</b> 41:18		<b>hold</b> 23:7,11 54:13 66:23 139:10	<b>identify</b> 6:12 111:18 122:2 123:8,11
	<b>guy</b> 40:20 42:15		<b>home</b> 13:22 14:7,17,23	<b>identifying</b> 147:16
	<b>guyana</b> 135:15			<b>ideological</b> 161:7
	<b>guys</b> 79:6 150:10 151:1			<b>ignore</b> 71:19
	<b>H</b>			
	<b>hal</b>			

<b>iii</b> 133:24	<b>increased</b> 25:19	85:15,19,22 86:2 86:9,23,24 87:1	60:13	130:5
<b>image</b> 34:15	<b>independent</b> 43:22 57:10	87:14,15,17,25 88:4,9 89:13,17	<b>interchangeable</b> 124:3	<b>issue</b> 20:4,9 24:12 28:4 28:7 37:12 39:16 39:22 79:3 91:14 122:22 124:9
<b>imagine</b> 34:11,12 50:3 57:20 135:13	<b>indicate</b> 32:4 59:4 69:19 70:4,23 74:16,21 75:1,3,5,8,13	90:11,15,17,25 91:6 92:11 93:25 94:22 95:1 96:17 97:19,23 98:1,4 98:13 100:18 103:6,10	<b>interest</b> 29:18 36:1,2	<b>issued</b> 92:9
<b>immediately</b> 44:12	<b>indicated</b> 6:7 29:12 78:18 103:7 107:16	<b>insight</b> 129:22	<b>interested</b> 52:15 164:19	<b>issues</b> 24:5,10,14 25:12 25:23 26:2,4 52:8 58:1 59:13
<b>implementations</b> 161:3	<b>indicates</b> 127:10	<b>inspired</b> 71:24	<b>interesting</b> 20:1 21:7 57:25	<b>ivy</b> 104:4
<b>implemented</b> 158:15,17 159:5	<b>indicating</b> 127:2 129:14	<b>instances</b> 158:10	<b>interests</b> 16:19,20 52:1	<b>J</b>
<b>implication</b> 114:9,10	<b>indirectly</b> 25:2	<b>instigated</b> 136:17,18	<b>interfor</b> 1:14 2:2 3:21 6:19	<b>jane</b> 1:14
<b>implied</b> 136:8,12	<b>individual</b> 47:25 55:1 123:20	<b>institute</b> 1:7 3:17 6:23	<b>interlocked</b> 128:4,6	<b>jay</b> 4:15 126:9 131:12
<b>implies</b> 132:18	<b>individually</b> 38:18	<b>institution</b> 22:4	<b>interpret</b> 48:1	<b>jersey</b> 1:1,24 2:13,15,24 3:6,11,16 6:8 14:23 164:6
<b>imply</b> 122:23,23	<b>infeasible</b> 159:8	<b>instructed</b> 126:17	<b>interrelate</b> 128:11	<b>jeske</b> 156:21
<b>implying</b> 136:17	<b>influence</b> 135:2	<b>intend</b> 7:23 8:6	<b>interrupt</b> 34:5	<b>joe</b> 100:7
<b>important</b> 9:23 10:7 16:17 54:5 84:15 108:7 108:11 110:20,25 111:9 114:22 120:15,17 144:21 156:8 159:18 160:17	<b>information</b> 5:2 56:23 59:24 59:25 60:8,9 92:25 94:19 108:16,24 113:2,7 113:13,22 117:16 119:13 140:6	<b>intended</b> 44:14	<b>intervention</b> 58:8	<b>john</b> 1:15 55:17 107:15 148:18
<b>impression</b> 69:24	<b>initial</b> 143:6 157:3	<b>intensive</b> 15:5,7,9 16:7,11 17:17,19,24 18:9 20:3,9 22:8 25:3 27:10,11,13,18 29:16,19 31:14 32:19,25 33:3 34:14 35:4 41:19 42:1,3,5 84:8 112:1 123:21,22 124:25 129:18 130:10,22 152:6 153:6	<b>introduced</b> 27:18 66:5	<b>join</b> 8:2
<b>inaccuracy</b> 129:6	<b>initially</b> 33:8 38:6 62:9 116:7 156:6	<b>instructed</b> 126:17	<b>introduction</b> 116:8 127:22	<b>joined</b> 10:13
<b>inaccurate</b> 11:25 139:25	<b>initiated</b> 8:17	<b>intended</b> 44:14	<b>investigate</b> 134:15	<b>jonestown</b> 135:15
<b>inappropriately</b> 110:11	<b>input</b> 155:21	<b>intensive</b> 24:2 26:5 32:22 84:4,6,10 85:1,5 85:10,12 106:12 124:5	<b>investigation</b> 56:16	<b>just</b> 9:8,15 10:12 12:23 19:6 35:12 42:25 47:9 49:5 65:13 67:3 101:17 105:9 108:20 110:10 111:17 114:8 118:12 126:15,16 133:11 135:3,20 137:21 140:7 144:25 150:1 158:14 162:1
<b>include</b> 132:11	<b>inquire</b> 92:21	<b>intention</b> 29:5 59:24 75:9 77:25 78:2	<b>invited</b> 14:2,9	
<b>included</b> 26:15 129:1,5	<b>inquiring</b> 91:22	<b>interaction</b>	<b>involve</b> 17:1 157:22,23	
<b>inconsistencies</b> 64:13,14,16,17	<b>inquiry</b> 4:7 6:2 83:25 84:3,5,11,14,16 84:23 85:4,10,13		<b>involved</b> 17:6 18:24 19:1 26:23 27:1 28:18 31:8 52:14 77:1 84:22 101:14 105:5 116:18,22 116:24 153:13 158:1,3	
<b>incorporate</b> 88:2 89:16			<b>involvement</b> 25:15 74:17 77:6 143:3 161:5,6	
<b>incorporated</b> 6:20 89:21 90:15 152:25			<b>isolating</b> 20:4 28:4	
			<b>isolation</b>	

<b>juval</b> 1:14 2:2 3:21 6:20	17:4,8,11,12 19:25 21:12 24:7 25:1,2,8 26:9 28:3 29:10,13,15 30:4 30:9,11,22 31:2 31:15,16,18 32:21 32:24 33:4,12,13 33:17 34:23,25 35:1 36:15 37:3 38:2 39:14 40:3 42:13 45:11 46:3 46:4,13,18 49:15 49:18 50:13 51:1 51:3,5,6,7,10,12 52:1,7 53:12 54:19 56:13,22 57:24 58:15,22,24 58:25 59:8,12,12 60:2 61:1 63:7 64:24 65:5,8,20 67:17,20 69:4,14 70:3,17 71:5 72:18,23 77:5,20 77:20 78:3 79:4 80:9 83:9 86:10 88:10 90:7 91:17 91:24 92:4,23 95:11 96:16 99:12 99:13,15 100:5,7 100:10,11,12,17 101:9,11,13,14 102:1,4,19,20,22 103:25 105:3 108:13,13 110:12 113:11 114:2 115:1,4,12,19 117:5 120:15 122:14 123:2 124:24 127:5 134:23 135:3,3,18 136:6,11 137:4,12 137:12,14 138:7,9 138:13,14,15,20 138:23,24 142:15 142:18 143:11,13 143:23 145:9 147:13 152:22 156:1,4,6,12,16 156:18 157:5 158:24 159:6	<b>knowing</b> 110:15 <b>knowledge</b> 13:2 15:20 69:5 71:2 148:22 157:12 <b>known</b> 1:3 35:18 <b>knows</b> 88:23 108:14 <b>kofman</b> 3:8 4:3 6:13,13 7:14 8:13,15 10:12,19,23 11:2 11:6 39:9,10 40:1 40:8,10 47:9,16 48:5,10,12 51:17 55:8,14 66:9,15 79:10,12,17 81:19 81:21 82:5,12 87:23 91:23 92:19 93:3,6,12,18 96:20,24 97:7,10 101:9,15 106:9,16 106:17 107:3,10 107:11 109:5,6 113:20,24 115:21 118:8,12,20 119:1 121:12,15,21 122:1 125:12 126:1,6,14 127:20 133:6,9,13 140:17 141:9,15,20 144:9 144:13,16 146:6,8 146:14,19,23 147:23 148:3,8,12 149:18,23 150:9 150:11 152:9,15 161:24 162:2,5,8 162:10 <b>kristin</b> 1:14 2:6,25 7:4 44:25 45:1 47:1 56:12,13 63:17 65:24 73:2 80:23 137:11 <b>kunterre</b> 80:1	<b>label</b> 88:11,13 133:18 <b>lama</b> 159:24,25 160:18 161:8,14,15,16 <b>lamas</b> 161:6 <b>landy</b> 3:19 6:18,18 7:18 150:7 <b>landys</b> 8:2 <b>lane</b> 8:10 <b>language</b> 76:2 <b>large</b> 123:15,18 124:21 124:23 125:1 161:20 <b>late</b> 135:15 <b>lauren</b> 156:22 <b>lawsuit</b> 8:16 37:10,14 38:4,5,8,21,25 39:12,14 50:1 57:25 60:11,15 62:19 63:18 136:20 <b>lay</b> 91:1 106:24 143:16,17 <b>learn</b> 30:22 31:12 32:13 40:15 56:5 88:24 130:9 <b>learned</b> 40:12 61:20 <b>leave</b> 133:14 145:13 <b>leaving</b> 145:15 <b>led</b> 136:6 <b>left</b> 32:13 137:15 <b>lefthand</b> 12:24	<b>legal</b> 32:9 45:22,25 47:21,22,23 50:6 50:9,10 65:9 76:22 143:16,17 157:22,23 158:4 <b>legs</b> 126:24 129:9,10 <b>leonard</b> 3:4 6:25 7:5 8:1 10:12,18 48:18 <b>leslie</b> 14:17 <b>lessons</b> 26:19 <b>letter</b> 7:25 48:7 101:16 106:13 110:18 114:8,12 116:8 117:8 <b>letting</b> 110:8 <b>level</b> 128:2 153:6 156:14 <b>license</b> 164:23 <b>life</b> 71:16 125:15 <b>liftons</b> 4:15 126:9 131:13 <b>likewise</b> 128:7 <b>limitations</b> 81:16 <b>line</b> 163:6 <b>lines</b> 12:7 <b>linguistic</b> 82:14 <b>list</b> 59:10 <b>lists</b> 30:9 <b>literally</b> 52:6 <b>litigation</b> 7:24 37:2,5,5,6 59:15 63:10 80:12
<hr/> <b>K</b> <hr/>		<hr/> <b>L</b> <hr/>		

80:14	57:2 63:15,15	31:4 33:7,14	<b>mat</b>	<b>meet</b>
<b>little</b>	67:8,12 100:17	122:9 145:14	83:19	13:9,13 19:17
40:21 49:1 71:19	132:1 134:15	<b>malintended</b>	<b>material</b>	20:13 40:17 41:6
77:23 90:22 96:2	<b>looking</b>	59:16,17,20,22	19:22 26:23 27:6	41:8 43:5 48:13
119:5,6,7 135:20	21:6 27:15 53:13	60:7,9,21,25	30:4	48:25 66:4 95:3
145:10 154:13	59:25 60:1 93:21	61:15,18	<b>materials</b>	136:1
<b>live</b>	119:23 120:9	<b>malintender</b>	30:10 43:18 44:5	<b>meeting</b>
102:12,23	127:21 150:3	59:23	44:7,10,15 82:25	20:8 41:16 42:18
<b>lived</b>	153:23 155:20	<b>mammal</b>	83:17,19 84:9,13	49:5 56:19 58:3
36:11	156:23	126:25	86:6 87:24 89:21	83:4 136:15,19,24
<b>living</b>	<b>looks</b>	<b>man</b>	90:14,18 108:5	139:7
102:5	11:11 60:3,4	74:14,14	110:5 138:4	<b>meetings</b>
<b>livingston</b>	66:23	<b>mandatory</b>	145:14,14 154:20	18:18 41:16 48:23
1:24 3:15	<b>loops</b>	151:9	<b>mathematical</b>	83:2
<b>llp</b>	158:24	<b>manual</b>	84:1	<b>member</b>
2:14,21 3:3,8,18	<b>lost</b>	122:9,21 123:14	<b>matter</b>	54:1 89:9
6:14,16,19 93:16	47:2,3	124:17,19	2:11 6:9 45:20	<b>members</b>
<b>loan</b>	<b>lot</b>	<b>march</b>	50:6 64:3	83:10
50:23 51:8	26:17 27:7 86:12	1:20 2:16 6:6	<b>matters</b>	<b>membership</b>
<b>loaned</b>	95:9,19 104:4	163:4	158:3	154:2,9
50:12,14,20	110:21 116:22	<b>mark</b>	<b>maximus</b>	<b>mention</b>
<b>locate</b>	122:25 154:19	66:10 93:6 96:20	55:5,9	34:1 37:2 70:14
63:24 80:14,24	160:14	111:5 113:20	<b>mcgann</b>	<b>mentioned</b>
<b>located</b>	<b>lowenstein</b>	126:8 129:13	2:11 164:4,22	16:13,25 21:4
81:5	3:13 6:22	141:9 148:4	<b>mcguire</b>	24:12 29:10 33:24
<b>logic</b>	<b>luibrand</b>	149:18 152:9	2:21,21 7:2,2,3,17	41:15 44:24 45:1
65:8	46:21,24 47:4,6,6	<b>marked</b>	28:6,12 65:19	49:3 50:3 51:20
<b>logical</b>	<b>lunch</b>	6:4 10:21 54:23	76:21 101:13,18	59:13 61:5 79:18
64:12,17 65:15	70:19 79:7 129:21	66:13,17 93:10	119:19	90:24
110:21 111:13,15	<b>luncheon</b>	97:1,13 106:10	<b>mean</b>	<b>mentor</b>
119:12	81:24	107:4,6,12 126:12	12:17 26:11 27:14	30:22
<b>long</b>	<hr/> <b>M</b> <hr/>	131:12 141:13	52:25 53:20 54:10	<b>met</b>
19:4,4,15 20:20	<b>machine</b>	146:9,10,17	60:19 72:18 76:23	13:7,17 22:21
22:13,18,23 28:5	137:13	148:11,14 149:21	85:21 86:12 87:4	43:8 57:14,15
29:1 34:9 35:18	<b>magazine</b>	149:24 152:13,17	87:20 103:13	72:9 95:5 136:21
54:12 82:21,23	135:21 136:2	152:21	123:24 124:15	141:3
105:4 123:24	<b>magic</b>	<b>market</b>	142:1 151:2	<b>method</b>
129:13 147:24	60:3	50:19,19	157:10	83:25 84:1,3,6,7
157:11	<b>mail</b>	<b>marriage</b>	<b>meaning</b>	84:11,14,16,19,20
<b>longer</b>	81:12	22:5	11:10 133:19	84:23 85:11,15,16
116:23 154:7	<b>main</b>	<b>martial</b>	135:3,4	85:19,22 86:2,9
<b>look</b>	70:10	95:23	<b>meanings</b>	86:15,18,22,23,24
14:4 46:1 63:11	<b>maintained</b>	1:8 3:17 6:23	135:2	87:1,13,14,15,17
63:14,17 64:2,7	7:8 79:20,22	55:17 61:21,24	<b>means</b>	87:25 88:4,9,10
66:16,19 84:23	<b>maintaining</b>	64:6,10,11 147:9	30:10 76:10	89:13,17,18 90:11
86:17 121:16	8:3	<b>mass</b>	151:22	90:15,17,25 91:6
132:4 138:4	<b>major</b>	135:14	<b>meant</b>	92:11 93:25 94:22
144:24,25 148:13	50:4	<b>master</b>	73:17,17 74:4	96:17 97:19,23
155:18	<b>making</b>	95:23,24,24	<b>measure</b>	98:2,5,13 99:5,6
<b>looked</b>			12:17	99:11,15,16

100:14,19 103:7 103:10 <b>methodologies</b> 86:25 87:16 <b>methods</b> 130:10,22 <b>mexico</b> 31:13,22,25 32:16 33:20 160:6,6,13 160:15 <b>mf</b> 1:5 <b>mich</b> 37:21 <b>michael</b> 15:13,15,18,21 16:1,3 33:23 34:7 34:15,19,21 35:1 35:5,8,11,18,24 36:4,6,8,20 37:13 37:24,25 40:13,16 40:18 41:4,6,14 41:15 42:9,12,14 42:18 43:25 44:24 45:4,8 46:19 49:2 49:8,12,17 50:5 50:11,25 51:18 52:5 56:18,18 57:9 58:2,7,11,16 58:25 59:3,10 68:17,18,20,23 69:1,3,6,17,19 70:4 71:7,11 72:7 72:15,16,19 73:5 73:6,10,12,17,19 73:22,24,25 74:4 74:5,13,16,21 76:1,12 78:11,12 78:18,23,25 <b>michaels</b> 38:2 69:23 <b>mid80s</b> 82:21 <b>midway</b> 133:17 <b>million</b> 12:6 <b>mind</b> 19:25 34:16 55:6 70:17 89:8 110:6	111:16 121:1 144:8 <b>mine</b> 54:12 63:7 <b>minor</b> 16:6 <b>minute</b> 7:17 47:10 <b>minutes</b> 79:12 <b>mischaracterizat...</b> 123:19 <b>mislead</b> 130:22 <b>missing</b> 119:12 <b>mission</b> 114:19,24 115:5 <b>mod</b> 116:16 <b>module</b> 90:2,6 104:11,16 104:25 105:9 112:8,9,11 116:8 116:12 123:24 128:3,5 129:8 133:23 149:5,9,25 150:1 151:25 152:2,7,25 <b>modules</b> 26:13 27:25 103:11,15,19,24 104:8,9,17 105:6 105:11 106:3,5,8 106:11,19 115:2 115:22,25 116:6 116:16 123:25 124:2 128:10 138:8 149:5 153:2 <b>moe</b> 68:4,5,14,16 73:14,17,17 74:3 74:13 76:8 77:4 77:22 <b>moment</b> 10:11 126:16 <b>money</b> 50:12,14 90:2,6 98:1,4 99:2,10,14 99:18 102:6,10,11	103:2 155:4 <b>month</b> 24:8 25:6,15 26:11 49:18 55:25 <b>monthly</b> 25:25 27:6 <b>months</b> 81:18 95:5 104:23 104:24 <b>moody</b> 1:14 2:2 <b>morning</b> 8:14 162:4 <b>morris</b> 1:7 3:12 6:16 8:15 13:7,9,22 60:24 68:8 71:8 72:14 73:6,8,20 75:3,5,9,13 76:18 76:25 77:8,13,25 78:1,3,19,23 <b>morristown</b> 3:11 <b>mother</b> 70:7,8,18,20,22 72:10 <b>motivated</b> 149:12,13 <b>mount</b> 1:23 <b>move</b> 78:9 90:22 147:21 <b>moved</b> 36:7,12 <b>movement</b> 160:6 <b>moving</b> 36:18 <b>muddles</b> 123:21 <b>mulberry</b> 2:23 <b>multi</b> 110:16 <b>multiple</b> 109:15 <hr/> <b>N</b> <hr/> <b>name</b> 8:14 53:12,16	54:21,25 55:6,10 57:4 80:7 89:5,7 96:11 99:7,17,20 100:21 101:3 117:22 139:15 149:9 161:13 <b>named</b> 46:21 59:5 <b>names</b> 58:14,15,17,18,20 58:23 59:1,10 104:1 116:14,21 156:19 <b>nancy</b> 1:13 2:6,25 3:23 7:3 13:22 14:3,6 15:11 18:22 19:2 20:17 25:1 31:3 31:19 48:23 49:4 51:11 55:6,9 56:13 61:17 65:23 68:12 73:2 86:5 104:3,11 137:8 156:12,13 <b>natalie</b> 140:5 155:2 <b>nature</b> 16:15,23 52:21 124:6 127:25 128:15 161:5 <b>near</b> 160:25 <b>necess</b> 120:1 <b>necessarily</b> 127:3 <b>need</b> 10:9 110:1 111:13 117:6 131:3 148:18 149:4 160:1 <b>needed</b> 22:19 79:2 <b>negative</b> 88:16 134:16 135:9 141:6,8 <b>neither</b> 135:6 164:16 <b>neuro</b> 82:14	<b>neurolinguistic</b> 82:18 88:3 <b>nevarez</b> 104:4 <b>never</b> 113:11 154:20 <b>new</b> 1:1,24 2:13,15,24 3:6,11,16,20,20 6:8 8:10 14:23 18:12 27:19 36:9 43:10 164:6 <b>newark</b> 2:24 <b>newer</b> 113:19 <b>nice</b> 42:15 <b>nonconflicting</b> 29:17 <b>nondisclosure</b> 19:14 20:11 <b>nonparticipants</b> 130:9,21 <b>normal</b> 102:6 115:12,19 <b>normally</b> 24:17 104:10 105:14 <b>notary</b> 163:24 <b>note</b> 120:25 145:11 <b>notes</b> 2:10 32:5,6 62:11 62:13,15,21 64:5 64:9,18 75:18 90:13,19 105:12 105:15,17 106:2,4 106:7,7,11 <b>notice</b> 144:21 <b>noticed</b> 133:16 <b>number</b> 12:2,8 21:12 47:15 54:20 58:16 64:12,13 69:11 82:4 83:5 96:10 96:14 100:25
--	---	--	--	---

119:3 128:23 157:18 159:9 160:7 <b>numbered</b> 153:8 <b>numbers</b> 93:14 <b>numerous</b> 72:18 157:8 <b>nxivm</b> 1:3 2:5,25 6:9 7:3 8:17 11:15 12:21 18:16 19:15 23:1 23:14,18,20 24:6 24:11,15,18 25:7 26:13,19 28:17,25 29:8 30:5,16,19 30:24 32:4,14 33:22 37:4 39:17 39:23 40:4,20 41:10 46:21 49:20 50:1,16,21 51:1,4 53:19,20,22 54:1 54:4,7,9,11,11,13 57:10 58:5,14,22 59:4,10 61:12 65:9 68:11,11,18 71:15 74:6,18,23 75:6,14 76:9,10 76:20 77:2,5 80:9 80:11 81:10 84:4 84:9 85:1,4,9 89:10,22 94:10 96:16,16 98:2 101:22 103:9,12 103:16 104:5,23 106:12,19 107:23 108:1,5,7,12,17 108:17,18,19,25 108:25 109:1,2,23 111:10 112:15,19 113:11 114:22,23 116:18,23,25 122:10,11 132:22 132:22,23 135:22 136:7,20 138:3,10 138:11,23 141:1,1 141:6,8 142:12 143:12,14 145:19 148:23,23 149:15	157:17 158:11 159:18 160:19 <b>nxivmrelated</b> 25:23 26:2 <b>nxivms</b> 50:6 62:5 113:4 117:3 <b>nycap</b> 80:1 81:10,11,14 <hr/> <b>O</b> <hr/> <b>oath</b> 8:11 82:9 <b>oaths</b> 164:7 <b>object</b> 7:18 28:6 65:19 76:21 78:13 <b>objection</b> 7:14 10:5,6 28:12 <b>objections</b> 8:7 <b>observe</b> 138:10,12 <b>obstruction</b> 72:6 <b>occasions</b> 8:22 27:24 62:17 66:4 105:15 136:4 140:23 <b>occurred</b> 136:19 <b>occurrence</b> 160:13 <b>offer</b> 27:25 77:3 161:9 <b>office</b> 4:11 91:10,12,21 92:5,9,18 93:9,24 94:13,20,21 95:7 <b>officer</b> 23:14,16 99:21 100:5 <b>offices</b> 2:14 62:5 94:5 <b>oh</b> 22:2 37:23 87:8 97:10 99:19 111:8 113:14 118:5 142:1 144:14	150:9 152:19 <b>ohara</b> 100:7 <b>okay</b> 7:5 10:20 11:10 11:18 12:11,23 13:3,5 14:6 15:8 15:14 16:9 17:1 17:15,23 18:7,16 18:20,25 20:2,18 22:2,7 23:18 25:6 25:18 26:6,22 27:23 28:14 29:10 31:24 32:3,21,24 35:6,8,18,21 38:13 40:7 46:6 46:15 47:17 48:2 48:5,10 49:6,23 50:20 51:3,10 52:7 54:21 55:15 56:4 58:11 60:23 61:3,20 62:8 64:9 66:9,20 67:9,12 67:15,18,21 68:13 70:1,4,23 71:6 74:5 75:16 79:14 81:1 82:23 83:10 83:13,24 84:25 87:3,19 88:17 89:5,9 90:22 91:2 92:15 93:5,24 94:17 97:4,5 98:20 99:10 102:18 106:9 109:12,22 110:23 111:8,11,17 114:4 114:10 117:6 118:5,8,14 119:2 119:15 121:9,10 121:13,16 123:4 123:14 124:17 125:8,20,23 126:7 126:15 129:12 130:6 132:4,7,20 133:1,12 135:16 135:20 136:23 137:3,23 138:3,7 138:15 139:5 141:5 142:25 144:3,6,15 147:4	147:10 148:3,9 149:2,9,11 150:3 150:21 152:9 153:2,7 154:15 155:16,18 156:9 156:23 157:6,16 157:20 158:5 <b>older</b> 113:18 <b>olsen</b> 38:17,24 39:7 47:19,20 48:3,8 92:3,5 93:16 94:4 137:8 142:13,25 <b>once</b> 24:8 36:5 49:18 148:11 153:15 <b>onepage</b> 141:16 <b>ones</b> 27:21 63:20 113:19,19 <b>onesided</b> 143:25 <b>ongoing</b> 91:15,25 100:23 <b>op</b> 150:18 <b>open</b> 74:2 <b>operated</b> 155:7 <b>operating</b> 137:13 <b>operation</b> 26:4 <b>operations</b> 26:7 <b>opinion</b> 20:23 28:15 29:9 37:9 39:2 52:17 61:14 75:12 76:7 77:3 139:9 <b>opinions</b> 58:10,10 91:13 <b>opportunity</b> 109:19 <b>option</b> 45:23 61:13 121:3 <b>optional</b>	150:19,22 151:6,7 151:18,20 154:8 <b>oral</b> 105:16 <b>orally</b> 105:13,14 <b>order</b> 7:12 32:7 103:18 124:4 128:1 <b>ordering</b> 85:6,7 104:12,14 <b>organization</b> 23:6,7,12 117:4 158:23 <b>organizations</b> 128:24 <b>original</b> 128:22 <b>originally</b> 19:13 65:6 71:15 73:8 103:3 137:15 157:1 <b>origins</b> 125:1 <b>outlining</b> 120:5 <b>outside</b> 98:18 <b>overnight</b> 147:21,24 <b>overridden</b> 157:8,17 <b>overseeing</b> 31:4 <b>overview</b> 124:4 <hr/> <b>P</b> <hr/> <b>p00000689</b> 4:13 97:1 <b>p00000209</b> 4:11 93:9 <b>p000003648</b> 4:17 126:11 <b>p000003674</b> 4:21 146:16 <b>p000004105</b> 4:19 141:13 <b>p000004995</b> 6:3 11:3
---	--	---	--	---

<b>p0000049954996</b> 4:8	<b>parenthetical</b> 113:3	91:10,12,14,21 92:2,4,9,10,18	100:23 103:25 104:1 110:15	138:24 143:14,20 150:25 151:5,13
<b>p000004996</b> 11:3	<b>parenting</b> 125:3	93:8,24 94:5,9,12 94:20,20,25 95:7	112:22,24,25 113:9,16,25 115:6	151:17 154:23 159:7
<b>p209</b> 93:14	<b>parents</b> 72:13	<b>patentable</b> 94:1,14	116:9,14,21,22 128:16 133:20	<b>personal</b> 112:23 158:22
<b>p231</b> 93:15	<b>park</b> 2:15 3:6 6:8 8:10	<b>patented</b> 94:18	134:20 135:2,2 137:9 138:14	161:15
<b>p3659</b> 133:17	<b>part</b> 18:18 24:2 26:17	<b>patenting</b> 50:18	154:8 158:7,22 159:9,18 160:8,15	<b>personally</b> 50:14 101:20
<b>p4105</b> 141:18	54:9 84:10,13,19	<b>patents</b> 94:11 95:4	<b>peoples</b> 135:12	<b>persons</b> 53:16 89:6
<b>p689</b> 97:14	88:10 94:9 113:20	<b>pattern</b> 88:12,13	<b>percent</b> 98:14,20,23 99:3	<b>perspective</b> 106:24
<b>page</b> 1:17 5:3,3,4,4,5	117:15 121:2	<b>patterns</b> 89:18	99:15	<b>pertains</b> 76:20
66:24,25 67:22	125:6,19 128:1	<b>patterns</b> 89:18	<b>percentage</b> 155:3	<b>peter</b> 3:14 6:21
111:25 130:19	131:4 134:18	<b>patterns</b> 89:18	<b>perception</b> 78:19	<b>petry</b> 3:24
133:17 153:7,23	147:25 160:22	<b>partial</b> 132:24 133:1	19:20	<b>ph</b> 1:8
163:6	<b>participants</b> 129:18 130:8,20	<b>participate</b> 143:1	<b>perform</b> 80:16	<b>philosophical</b> 23:2 85:7
<b>pages</b> 4:9 66:12	130:22	<b>participated</b> 32:22 142:6	<b>performs</b> 16:21	<b>philosophically</b> 83:15 128:12
<b>pai</b> 95:24	<b>participating</b> 17:20	<b>participating</b> 17:20	<b>period</b> 7:21 24:16,25	<b>philosophy</b> 23:5 24:5 89:16
<b>paid</b> 50:5 70:1 155:4	<b>particular</b> 27:21 132:2	<b>particular</b> 27:21 132:2	25:18 49:16 57:4	89:19,20 157:13
<b>pam</b> 156:22	<b>particularly</b> 107:24	<b>particular</b> 27:21 132:2	69:10 72:23	157:14
<b>panel</b> 161:23	<b>parties</b> 61:6 105:23	<b>particular</b> 27:21 132:2	104:22	<b>phone</b> 1:24 45:22 139:12
<b>panels</b> 160:3 161:2	164:18	<b>particular</b> 27:21 132:2	<b>periods</b> 154:11	148:19 151:5,12
<b>paper</b> 63:1,2 86:19,21	<b>parts</b> 84:13 109:15	<b>particular</b> 27:21 132:2	<b>perretti</b> 3:8 6:14,15	151:17 153:8
87:13	116:16 117:17,18	<b>particular</b> 27:21 132:2	<b>persistence</b> 4:22 149:10,20,25	158:21 159:1
<b>papers</b> 43:20 63:12	118:2,3 122:15	<b>particular</b> 27:21 132:2	151:25	<b>phrase</b> 74:15
140:12	132:11 134:11	<b>particular</b> 27:21 132:2	<b>persistence</b> 149:12 152:1,2,2	<b>phrasing</b> 68:17
<b>paragraph</b> 67:21 111:25	<b>party</b> 14:2,9 39:13,13	<b>particular</b> 27:21 132:2	152:4,7	<b>piano</b> 26:19 102:9
127:21,23 129:14	<b>pass</b> 150:7	<b>particular</b> 27:21 132:2	<b>person</b> 23:2 30:24 31:6	<b>pick</b> 147:19
130:7,19 148:17	<b>passing</b> 43:7,8	<b>particular</b> 27:21 132:2	32:1 45:23 52:14	<b>piece</b> 128:3,12
153:8,24,24	<b>patent</b> 4:10 50:16 86:22	<b>particular</b> 27:21 132:2	53:12,13,19 54:7	<b>pieces</b> 122:24,25 123:1
155:20 157:6	87:4,8,13,20	<b>particular</b> 27:21 132:2	54:10,13 59:20,22	124:3 128:4
<b>parasite</b> 133:24	90:24,25 91:3,7	<b>particular</b> 27:21 132:2	65:8,9 69:22,23	<b>piles</b> 63:1,16
<b>pardon</b> 45:12		<b>particular</b> 27:21 132:2	88:21,25 89:7	<b>place</b>
<b>parentheses</b> 112:4		<b>particular</b> 27:21 132:2	91:1 105:11	
		<b>particular</b> 27:21 132:2	106:24 122:8,20	
		<b>particular</b> 27:21 132:2	129:7 134:13,14	



17:24 18:11 19:5 34:7,10,22 37:25 39:4 42:23 105:22 161:19 164:14	<b>position</b> 7:6 8:3 72:5 93:2 93:25	98:8	<b>problem</b> 7:13 111:8	158:8
<b>placement</b> 77:9	<b>positive</b> 14:14 17:22 18:23 21:5 51:2 62:2	<b>presented</b> 67:16 113:2 152:3	<b>problems</b> 23:5 57:25 59:14 102:10 110:21,22	<b>promotions</b> 156:14
<b>places</b> 72:19	135:6,9 141:6 161:18	<b>presently</b> 26:25 53:25 54:3 96:16	<b>problemsolving</b> 12:5	<b>pronouncements</b> 91:21
<b>plaintiffs</b> 1:5 2:24	<b>possession</b> 106:1	<b>press</b> 67:25	<b>procedure</b> 28:17,17 30:23 33:6,14 84:21 105:8 156:4	<b>property</b> 98:19
<b>plan</b> 161:3	<b>possibility</b> 57:9	<b>pretensions</b> 112:2	<b>procedures</b> 53:9 59:18,19 84:22	<b>proskauer</b> 65:2,3,11,16,21 65:25 66:2,4,5
<b>plane</b> 31:17	<b>possible</b> 45:13 154:18	<b>pretty</b> 56:13 74:10 120:10 154:16	<b>proceeding</b> 32:10	<b>proskauers</b> 65:22 66:3
<b>played</b> 120:18	<b>possibly</b> 19:2 21:9 117:25	<b>previous</b> 56:19	<b>proceedings</b> 2:10	<b>prove</b> 131:7
<b>plaza</b> 3:10	<b>posted</b> 55:16 56:1,5,11 56:15 77:2 131:21 147:1,7	<b>previously</b> 10:15 82:8 107:17 109:24	<b>process</b> 95:11 104:7 105:6 105:18 156:8	<b>proven</b> 131:3
<b>pleasant</b> 1:23	<b>potential</b> 98:15 143:7,9	<b>primarily</b> 89:25 114:15	<b>proctor</b> 54:16,17 95:18 153:22	<b>provided</b> 30:5,8 105:12,15
<b>please</b> 6:11 7:15 10:2,10 66:10,19 76:23 78:6 93:6 96:20 107:4 108:21 109:17 115:14 123:8 144:13 146:14 149:18 152:9 158:4	<b>potentially</b> 42:2 110:14	<b>principles</b> 1:4 8:18 23:22,23 51:2,4 53:8 97:20 97:23,24 98:2,12 98:17 101:23	<b>produced</b> 11:4 93:13 97:14 101:10,12 141:17	<b>provides</b> 84:9 89:22
<b>point</b> 10:9 13:23 14:16 15:5 20:12 24:7 33:23,23 37:12 38:22 40:7,12,18 43:21 46:25 47:12 55:16 56:15 61:20 62:9 64:20 81:24 114:19,23 115:9 116:9,15 119:18 126:2 132:2 143:6 156:20 160:13 161:22	<b>power</b> 74:3 76:9	<b>print</b> 62:8	<b>producer</b> 133:24	<b>psychiatrist</b> 4:14 107:6,14
<b>points</b> 116:11 142:1	<b>powerful</b> 74:14	<b>printed</b> 62:10	<b>products</b> 53:4,6 86:23 87:14	<b>public</b> 91:21,24 113:14 160:4 161:20 163:24
<b>portion</b> 22:22 50:6 108:4	<b>practice</b> 7:12 15:24 16:2,6 16:10,14 21:3,5 29:12 133:24 149:6 151:14,19 151:22	<b>prior</b> 20:8 48:14 69:12 69:14,15 83:11,12 139:7 142:20 164:8	<b>program</b> 59:6 123:19 154:8	<b>publication</b> 113:7 139:7
<b>portions</b> 7:10,22 8:5	<b>prefect</b> 95:18	<b>priorities</b> 159:19	<b>programming</b> 82:15,18 88:3	<b>publish</b> 57:1 117:23
<b>poses</b> 57:25	<b>prep</b> 48:25	<b>private</b> 22:3	<b>programs</b> 1:3 4:16,18,21 13:1 15:19 18:14 26:8,13 57:3 123:17 124:22,23 126:11 131:14 141:11 143:21 146:16,22 148:23 153:4,5	<b>published</b> 135:21 136:2
	<b>preparations</b> 160:1	<b>privilege</b> 39:25 40:3 91:19 92:14 158:1,2	<b>promise</b> 130:8,20,23	<b>purchase</b> 103:2
	<b>prepare</b> 48:14	<b>privileged</b> 39:8	<b>promotion</b> 32:9 155:20,25 156:5,10 157:1	<b>purchased</b> 102:15
	<b>prepared</b> 1:22 11:12,15 79:1	<b>probably</b> 12:10 27:11 32:1 34:18 35:17,20 57:20 65:13 70:15 72:16 139:4 140:16 156:22 157:18		<b>purchases</b> 102:21
	<b>present</b> 3:22 18:20,22 37:24 39:3 43:2 48:20,23 72:20,23 72:24,25 73:2,3,3			<b>purchasing</b> 102:20
				<b>purports</b> 141:18
				<b>pursuant</b> 164:7
				<b>pushed</b> 71:24
				<b>put</b> 27:10,13 86:21

87:12 96:5,5 101:15 103:2 114:23 115:3,22 115:25 116:4,7,15 116:25 120:11 128:12 140:12 146:12 160:2	121:16 <b>quite</b> 128:22 <b>quote</b> 75:16 133:23 139:2 <b>quotes</b> 114:15,16	4:15 126:8,12 131:12 <b>raniere7</b> 4:18 141:10,14,16 <b>raniere8</b> 4:20 146:11,18,19 <b>raniere9</b> 4:22 149:19,22,25 <b>rank</b> 54:13,15 94:14 157:7,9,15 <b>ranked</b> 96:6,7 <b>ranks</b> 96:8 153:18,20,20 <b>rational</b> 4:7 6:2 83:24 84:3,5,11,14,16 84:23 85:4,10,13 85:15,18,22 86:2 86:7,8,23,24 87:1 87:14,15,17,25 88:3,9 89:13,17 90:11,15,17,25 91:6 92:11 93:25 94:22 95:1 96:17 97:19,23 98:1,4 98:13 100:18 103:6,10 <b>read</b> 11:24 39:18,19 43:19 44:18 61:25 62:10 76:12,15 83:22 87:10 89:2 89:15 95:8 107:17 108:21,22 109:4,7 109:10,20 110:4 115:15 122:7 125:12 143:6,23 144:3 145:2,4 147:6,10 153:11 163:3 <b>reading</b> 83:21 118:10 145:6,8,25 <b>reads</b> 122:23 <b>really</b> 34:11 36:23 57:24 123:19 151:2	159:17 <b>realtime</b> 2:12 164:5 <b>reason</b> 29:2 32:6 74:22 94:3 <b>reasonable</b> 19:20 29:2,2 <b>reasons</b> 36:17 71:7 <b>reath</b> 2:14 3:3 6:25 <b>recall</b> 14:8 15:21 17:23 17:25 18:25 22:17 31:16 32:20 37:2 40:19 45:15,17 56:25,25 64:9 65:11,12 67:18 69:9,10 70:16 80:10 82:23 93:24 104:2 135:21 <b>receive</b> 98:1,4 102:18 155:3 <b>received</b> 6:4 66:12 93:10 97:1 101:20 107:6 126:12 138:8 141:13 146:17 149:21 152:12 <b>recess</b> 47:13 81:24 121:20 126:3 <b>recitation</b> 44:7 <b>recognize</b> 11:7 66:22 146:24 <b>recollect</b> 45:7 <b>recollection</b> 14:2,5,14,19 18:1 20:22 40:16 43:16 43:22 74:1,8 92:8 93:22 116:3 130:21 <b>recommendation</b> 45:19 <b>recommendations</b> 156:15	<b>reconstruct</b> 35:10 <b>record</b> 9:25 10:13,23 11:2 45:9 51:16 79:15 82:13 93:12 101:16 109:13 118:15,17,21,24 119:17 126:5 133:8 136:23 141:15 146:6,7,19 162:12 <b>recorded</b> 9:20 43:25 136:25 137:20,24 <b>recorder</b> 137:4 <b>recording</b> 9:22 44:14,16,19 44:23 45:3,5 137:22 <b>records</b> 41:18 116:25 <b>recruiting</b> 115:7 <b>redirect</b> 4:2 <b>refer</b> 95:24 153:17 <b>reference</b> 12:11 86:13 <b>referenced</b> 30:13 86:11 <b>referred</b> 150:1 <b>referring</b> 51:8 68:10 98:22 104:22 <b>refers</b> 144:19 <b>reflected</b> 104:18 <b>reflection</b> 110:3 <b>reform</b> 4:16 126:10 131:13 <b>refresh</b> 93:21 <b>refused</b>
<b>puts</b> 77:14,16 122:10 123:1 <b>putting</b> 103:6 <b>puzzle</b> 124:3 128:3,12	<hr/> <b>R</b> <hr/> <b>raised</b> 37:13 72:15 <b>ran</b> 43:11 <b>rand</b> 89:12 96:11,12 <b>rands</b> 89:15 <b>raniere</b> 1:13,19 2:5 3:7 4:3,7,9 6:2,9 7:1,6 8:14 9:15 10:20 13:7 28:3 40:4,11 43:24 47:17 48:8 48:13 55:15 66:11 66:16 79:18 82:13 83:24 97:8 102:5 106:18 107:16 113:25 122:2 126:7,15 133:10 133:16 141:21 146:10 149:24 163:2 <b>raniere1</b> 4:6 6:4 10:21 <b>raniere10</b> 4:24 152:10,13,17 152:21 <b>raniere2</b> 4:9 66:10,13,17 148:14,16 155:19 <b>raniere3</b> 4:10 93:7,11,12 <b>raniere4</b> 4:12 96:21 97:2 97:13 <b>raniere5</b> 4:14 107:4,7,12 126:16 <b>raniere6</b>			
<hr/> <b>Q</b> <hr/> <b>qualified</b> 122:5 <b>question</b> 9:24 10:1,2 20:7 21:18,20 24:9 26:18 28:18,21,24 29:4 37:6 39:18 44:4 46:5 53:6 59:16 75:7 76:22 78:14 87:19 90:21 92:16 108:21 109:14,16,18 120:9 122:18 128:8,18,19 129:10 132:14,15 134:18 149:4 <b>questionandans...</b> 17:22 21:9 22:4 25:12 <b>questionanswer</b> 24:8 <b>questioning</b> 129:17 <b>questions</b> 9:19,19 13:5 20:15,16 23:3,4 24:5,17 25:3,5 28:14,16 47:18 72:10 85:6 104:12 104:13,14 109:8 116:12 120:18 128:6,6 140:3 146:3 157:15 <b>quick</b>				

138:17 <b>rejected</b> 158:14,16,19 159:11,12,20 <b>relate</b> 158:3 <b>related</b> 49:20 63:12 77:5 86:22 87:5,13,21 90:23 145:13 <b>relating</b> 23:3,4 26:4 40:21 50:18 52:16 56:23 58:1 59:14 63:18 63:25 64:3,5 65:4 65:9 79:3 99:5 103:19 106:2,5,11 111:1 114:14 157:13 <b>relation</b> 77:20 <b>relationship</b> 33:21 49:2,11 70:18 72:11 77:21 96:3 100:2 128:10 154:24 <b>relationships</b> 112:23 <b>relative</b> 46:10 164:17 <b>relatively</b> 19:6 <b>release</b> 120:2 122:12,12 <b>relevant</b> 80:14 <b>relying</b> 31:17 <b>remaining</b> 147:18 <b>remem</b> 32:17 58:15 <b>remember</b> 12:17 15:23 18:5 21:13 30:20 31:21 31:23 32:2 34:3,6 35:17 36:1,23 37:18 39:5 42:11 42:13,16 43:13 50:20 52:10 56:2	56:7,10 57:5,19 58:6,16 59:8 62:3 62:14 64:8 65:1 65:16 70:21 71:1 74:19 78:5 80:21 89:5 116:14,20 139:15,19 <b>rendition</b> 44:6,11 <b>repeat</b> 20:6 78:6 <b>rephrase</b> 10:3 75:7 <b>replicate</b> 113:4 <b>reporter</b> 2:12,13 9:20 10:8 39:20 42:2 87:11 108:20,23 115:16 136:1,8,10,21,24 137:1 138:4 164:5 164:5 <b>reporters</b> 140:20 <b>reporting</b> 1:23 <b>reports</b> 64:6,6 <b>represent</b> 6:12 38:5,18 <b>representation</b> 147:24 <b>representations</b> 52:16 139:21 <b>representative</b> 39:16,17,22,23 161:8,11,13 <b>represented</b> 10:4 <b>representing</b> 6:16,22,25 7:3 8:15 39:11 40:4 92:1 <b>represents</b> 96:17 117:20 <b>request</b> 5:3,3,4,4,5 7:20 48:6,11 80:22 81:17 101:16,19 106:10,14 113:21	113:23 140:17,19 <b>requested</b> 5:2 <b>requests</b> 81:3 <b>require</b> 148:23 <b>required</b> 16:15 149:15 <b>requirement</b> 149:8 151:9 <b>requirements</b> 30:18 33:6 <b>requires</b> 16:7,14 <b>reread</b> 109:16 <b>research</b> 41:1 <b>reserve</b> 8:7 <b>residence</b> 140:11 <b>residing</b> 8:9 <b>respect</b> 60:15 78:3 110:2 140:4 147:16 157:12 <b>respond</b> 106:15 <b>response</b> 37:19 38:2 81:3 140:4,7 <b>responsibility</b> 31:3 33:5 150:14 151:1 <b>responsible</b> 70:24 71:3 76:19 76:24 <b>rest</b> 160:25 <b>restate</b> 125:15 <b>result</b> 111:22 112:5 <b>results</b> 17:12 29:13 84:7 84:17,18,23,25 85:3 100:13,18	<b>resumed</b> 82:9 <b>retain</b> 62:25 81:15 <b>retained</b> 62:21,23 <b>retainer</b> 39:6 40:2 48:2,7 <b>retaining</b> 57:9 58:4 <b>retention</b> 12:12,17 <b>retracted</b> 136:10 <b>retreat</b> 1:8 3:17 51:23 <b>return</b> 145:13 <b>reveal</b> 68:21 131:7,9 <b>revealed</b> 68:20 126:25 147:11 <b>review</b> 11:18,20 12:10 16:8,14,15,18,21 16:23 17:1,8,11 17:13 29:11,13 67:5 104:17 143:9 <b>reviewed</b> 11:14,16 83:16 104:25 105:1 107:25 108:3 123:14 124:17,19 131:23 <b>reviewing</b> 143:15 <b>revision</b> 142:15 154:17 <b>richard</b> 2:22 119:18 <b>rick</b> 1:7,10 3:17,24 6:22 10:13 40:12 40:17,21,23 41:7 41:11,14,17,20,23 41:25 42:4,10,12 42:15,17,21 43:15 43:17 44:5,10,13 44:14,15 55:16	56:16,20,24 57:15 58:3,9 67:23 68:1 68:3,8,25 69:7,25 70:2,5,25 71:4,8 72:14 73:7,9,15 73:20 74:22 75:24 76:2,4,19 77:2,4,9 77:13,16,21 78:20 107:20 136:9,13 136:15,19 147:2 <b>ricky</b> 1:7 <b>right</b> 8:7 9:21 13:5 51:9 58:6,7 66:3 92:20 121:7 123:3 125:14 144:24 146:8 154:4 <b>rights</b> 97:19,22 98:13 <b>riker</b> 3:8 6:13,15 <b>rituals</b> 4:24 152:11,25 <b>road</b> 18:12 34:24 43:10 <b>robert</b> 3:4,19 4:15 6:18 6:24 126:9 131:12 <b>rochelle</b> 1:7 3:12 6:16 8:16 13:17,19,23 60:24 69:19 70:5 <b>role</b> 23:1 78:3 96:4 <b>room</b> 14:3 18:24 119:19 <b>roseland</b> 3:16 <b>ross</b> 1:7,7,8,10 3:17,17 3:24 6:22,23 10:13 40:12,17,21 40:23 41:7,11,14 41:17,20,23,25 42:4,10,12,15,17 42:21 43:15,17 44:5,10,13,14,15 55:16 56:16,20,24 57:16 58:3,9 59:6
---	--	--	---	---

59:11,16,17 60:15 60:20 61:8,15 67:23 68:1,3,8,14 68:16,25 69:7,20 69:25 70:2,5,25 71:4,8 72:14 73:7 73:9,15,20 74:22 75:24 76:3,4,19 77:2,5,9,13,16,21 78:20 107:20 131:21 136:9,13 136:15,19 147:2	<b>sandler</b> 3:13 6:22 <b>sara</b> 139:2 <b>saratoga</b> 155:9 <b>sarzen</b> 55:11,12 73:3 <b>sash</b> 157:11 <b>sashes</b> 94:10,13 <b>sat</b> 138:15 <b>save</b> 140:8 <b>saved</b> 113:17 <b>savings</b> 102:13 <b>saw</b> 93:22 <b>saying</b> 7:25 34:15 40:19 43:17 69:11 74:19 74:20 78:5 120:20 124:16 133:21 <b>says</b> 44:14 110:4 119:24 123:14 142:17 144:4,21 145:12 150:13 151:4,11 153:24 154:2 157:6 <b>scan</b> 111:20 <b>scarf</b> 154:4 <b>scarves</b> 94:10,13 <b>scherer</b> 3:8 6:14,15 <b>schmeiser</b> 93:16 <b>school</b> 95:14 153:3 <b>scien</b> 83:3 <b>science</b> 52:14,18,19,21	60:4 112:2 <b>scientists</b> 52:16 <b>scientologists</b> 83:6 <b>scientology</b> 83:3,8,11,14,16 88:6,19,24 <b>score</b> 96:9 <b>scouts</b> 94:15 <b>scrap</b> 63:1 <b>screen</b> 6:7 <b>sculpt</b> 130:16 <b>se</b> 28:1 65:13 123:7 156:17 <b>sean</b> 89:8 <b>search</b> 79:19 80:16 81:18 <b>searched</b> 80:13 81:1,16 <b>second</b> 20:15,19 32:25 33:3 58:10 128:17 134:18 154:2 <b>secret</b> 105:19 106:23,25 107:1,2 108:8,10 108:18 109:1,24 110:4,9,12,14,15 110:20,25 111:10 111:16,18 114:21 115:11,18 117:7 117:14,15,17,18 117:20,25 119:4 120:2,16 122:3,4 122:6,17 123:9 124:6,8,14 125:5 125:6,7,19,19 126:18,21,23 127:3,4,4,5,5,6,10 127:10,16,25 128:15,25 129:8 129:15 130:12	131:1,4,7,10 132:10,22 <b>secrets</b> 16:17 68:20 106:20 107:23 108:2,5,10 109:23 110:8 114:5,20 120:10 122:8,12 122:16,16 123:5,6 123:11 124:18,19 126:25 130:17 131:5,24 132:3,5 132:8,18 147:11 147:16 <b>section</b> 121:1 156:23 <b>see</b> 14:4 30:13 46:15 49:6,6,17 59:25 64:22 65:7 73:24 114:13 118:2 129:16 132:4 144:3,14,21 150:12 <b>seeing</b> 111:7 <b>seeker</b> 19:24 59:22 <b>seeking</b> 47:21,22 <b>seeks</b> 59:23 <b>seemingly</b> 19:21 29:2 136:17 <b>seen</b> 11:16 22:11,23 30:9 32:3,5,11 49:7 72:6 93:19 100:13 101:6,8,11 114:7 131:17 135:7 141:21,24 158:9 <b>segment</b> 32:9 <b>segments</b> 129:20 130:2 <b>seiler</b> 3:18 6:19 <b>selected</b> 30:12 77:9	<b>selecting</b> 77:1 <b>selects</b> 77:4 <b>selfexplanatory</b> 117:22 <b>selling</b> 116:10,15 <b>seminal</b> 136:18 <b>seminars</b> 27:22 <b>senators</b> 74:14 <b>send</b> 7:25 <b>sense</b> 102:7 115:12,19 134:22 135:7 <b>sent</b> 113:25 161:8 <b>sentence</b> 67:23 75:21 122:15 124:14,16 125:5,7,13,18,19 128:21 129:1,4,5 129:6,11,17 130:6 136:16 150:12,17 153:11 154:2 157:6 <b>sentences</b> 65:14 <b>separate</b> 42:14 74:23 103:9 <b>series</b> 9:18 67:24 72:8 94:11 139:21 158:24 160:3 161:2 <b>serve</b> 18:17 <b>server</b> 80:9 81:10,11,12 81:12,13,14 <b>serzen</b> 55:13 <b>session</b> 17:22 19:9 21:9 83:5 <b>sessions</b>
<b>roughly</b> 57:19 <b>royalty</b> 98:14 <b>rr</b> 80:1 <b>rule</b> 28:25 29:4,5,6 71:12 <b>ruler</b> 96:2 <b>rules</b> 4:24 9:16 152:11 152:25 156:25 157:4 <b>run</b> 9:8,15 158:12 <b>rutgers</b> 15:25	<b>S</b>			
<b>sake</b> 110:10 <b>sales</b> 24:18 <b>salespeople</b> 24:19 <b>salinas</b> 139:1 <b>salzman</b> 1:13 2:6,25 3:23 7:4 13:22 14:6 15:11 19:2 51:11 55:11 61:17 68:12 86:8 100:9 102:15 156:12,22 <b>salzmans</b> 31:3				

83:3	22:18 29:1 42:4	4:9 66:12	<b>source</b>	140:20 158:9
<b>set</b>	42:25 50:23	<b>sixteen</b>	68:24 69:2 75:8	<b>sponsored</b>
27:19 59:21	138:18 161:17	129:18	86:6 87:24 98:5	83:7
137:14 144:8	<b>signature</b>	<b>skeptic</b>	102:18	<b>sponsoring</b>
150:14 151:1	67:2 97:15	60:2,3	<b>sourcing</b>	161:4
164:14	<b>signed</b>	<b>skolnik</b>	112:10	<b>spring</b>
<b>settings</b>	4:9 19:18 20:14	3:14 6:21,21 8:2	<b>speak</b>	9:2 18:6 32:19
161:1	22:13,20,24 43:2	10:17 87:6	17:15 21:1,2 36:3	<b>stammered</b>
<b>severed</b>	43:5 66:11 67:8	<b>slightly</b>	50:17 52:23 53:18	136:10
154:24	69:16 78:25 97:18	14:1	118:12 145:18	<b>stamp</b>
<b>sf00033</b>	163:5	<b>small</b>	151:4,12,16	93:14,15 148:7
4:24 152:12	<b>signified</b>	29:12	153:14	<b>stamped</b>
<b>sf00104</b>	154:3	<b>social</b>	<b>speaking</b>	4:8,11,13,17,19
4:23 149:21	<b>signing</b>	14:12 49:7,20	58:6 91:1 110:5	4:21,23,24 6:3
<b>shadows</b>	20:10 129:18	75:10	<b>speaks</b>	11:3 93:9 97:1,14
127:2	<b>signs</b>	<b>sole</b>	35:12 145:16	126:11 133:17
<b>share</b>	42:8	85:18,20	<b>specific</b>	141:13,17 146:16
94:4,4 130:20	<b>similar</b>	<b>solomon</b>	25:2 26:3 81:14	149:21 152:12
<b>shared</b>	11:8,14,17,18	101:4,12,22	85:6,6,25 88:1	<b>stand</b>
80:2	88:20,22 128:23	<b>solomons</b>	90:12 103:13	82:9
<b>sheldon</b>	142:20,22	101:7	109:8 128:4,5,10	<b>start</b>
101:3,4	<b>simple</b>	<b>solve</b>	149:3	121:2 122:22
<b>shifter</b>	140:7	23:5 102:10	<b>specifically</b>	128:16
117:19	<b>single</b>	<b>somebody</b>	14:21 20:13 21:4	<b>started</b>
<b>shifting</b>	27:25 124:15	16:4,13 51:13	22:17 30:6 50:7	36:8 83:21 122:6
135:20	<b>singlepage</b>	54:3	60:22 61:1 62:16	136:16
<b>short</b>	97:13	<b>someones</b>	64:8 69:17 70:21	<b>starting</b>
19:6 47:12 125:23	<b>sir</b>	60:8	73:6 108:6 123:23	123:5 162:4
126:2	11:7 46:5 93:19	<b>someplace</b>	134:15 138:24	<b>starts</b>
<b>shortly</b>	97:12 109:9	140:13	<b>specificity</b>	120:2 122:24
32:15 55:21,23	121:17 125:16	<b>somewhat</b>	156:7	124:8,9,11 129:8
<b>show</b>	127:21 146:24	30:1 160:12	<b>specified</b>	161:23
10:20 31:15,24	<b>sister</b>	<b>sorry</b>	99:9	<b>state</b>
32:16 34:14 35:4	45:6,10	9:9 21:24 31:19	<b>speedwell</b>	2:13 21:15 134:20
92:21 93:3 126:7	<b>sit</b>	34:5 37:21 43:8	3:10	149:12,13 155:20
131:11	13:21 43:25 45:18	49:4 55:23 57:14	<b>spend</b>	164:6
<b>showing</b>	104:10 116:20	61:4 66:1 87:9	25:22 27:5	<b>stated</b>
94:14 97:8,12	138:8,19 142:25	90:4 97:6,10	<b>spending</b>	30:14 64:10 94:13
107:12	156:18	111:7 117:14	159:25	<b>statement</b>
<b>shown</b>	<b>site</b>	141:15 145:7	<b>spirit</b>	68:13,24 111:1,21
33:20	57:7 76:3	150:9 152:19	29:5	111:23,24 114:20
<b>shrugs</b>	<b>sitting</b>	<b>sort</b>	<b>spoke</b>	114:24 115:5
10:8	9:20 137:16	15:24 24:20,22	17:13 18:7,20	116:4 119:24
<b>shun</b>	<b>situation</b>	60:6,13 63:1	19:23 20:3 21:1	131:7
71:13,14	45:24 67:19	124:6 134:17,18	47:20 51:18 52:5	<b>statements</b>
<b>sic</b>	122:10,11 123:1	136:16	70:21 138:14,23	131:2
123:15 130:23	160:7	<b>sorts</b>	139:4	<b>states</b>
<b>side</b>	<b>situations</b>	53:10	<b>spoken</b>	1:1 4:10 45:22
154:4	160:5	<b>sounds</b>	13:15,19 41:22	93:8
<b>sign</b>	<b>six</b>	47:2 121:21	70:19 72:19	<b>status</b>

91:2 94:21,25	147:5 155:23	<b>substance</b>	15:10 16:3,16	<b>sworn</b>
<b>staying</b>	156:23	66:6	20:17 22:10 24:7	8:11 82:9 163:22
160:19	<b>stripe</b>	<b>success</b>	26:4,12 34:11	164:9
<b>stems</b>	154:4	1:3 4:16,18,21	35:5 39:1 41:5	<b>sylvester</b>
128:1	<b>stripes</b>	13:1 15:19 18:14	44:8 47:8,11 48:4	3:9 6:15 10:25
<b>stenographic</b>	153:25	26:7 57:3 123:16	48:24 54:6 56:13	45:12 79:6 115:13
2:9	<b>strokes</b>	124:22,23,25	57:24 58:8 60:17	115:20 118:11
<b>stenographically</b>	134:9	126:10 131:14	64:20 67:11,13	121:5,8 125:10,14
164:13	<b>strong</b>	141:11 143:21	74:10,11 77:11	125:24
<b>stephanie</b>	51:15 69:24 73:25	146:16,22	78:16 79:14 81:4	<b>symbols</b>
1:8 3:12 4:19	<b>stronger</b>	<b>successively</b>	81:20 83:4,23	12:23
6:17 8:16 14:25	70:18 73:10	129:20	89:1 90:20 91:11	<b>system</b>
15:15,22 17:9,13	<b>strongly</b>	<b>sufficient</b>	93:20,20 100:15	21:19 158:21
17:15 18:7 19:2	71:24	69:15 113:3	101:15 104:3,15	<b>systems</b>
19:12 20:3,5,8,20	<b>structure</b>	<b>suggest</b>	104:18 107:24	158:12
21:2,8 22:2,8,13	124:2,7 129:22	24:21 45:24,25	108:13 113:5	
24:12 28:4,22	157:7,10	46:6 57:13,15	117:2 123:2	<b>T</b>
29:11,21 30:4,15	<b>structured</b>	158:12	133:15 134:12	<b>taibbi</b>
31:12,20 32:4,13	124:12 129:23	<b>suggested</b>	136:8 137:21	29:21,24
32:22 33:19 34:13	<b>student</b>	57:11 58:9 159:14	138:5 139:3	<b>tail</b>
34:19 35:9 36:22	4:18 15:19 17:2	<b>suggesting</b>	142:13 147:13	126:24
36:25 44:1,8,11	42:8 53:19,21	143:5	149:4 154:16	<b>take</b>
46:3 70:23 71:3	55:2 89:10 141:12	<b>suggestion</b>	160:22 161:1	6:8 10:8,10 11:24
141:12,19	141:18,24 142:21	158:18	<b>suspect</b>	18:11 19:5,17
<b>steps</b>	142:23 143:15,19	<b>suggestions</b>	20:17 24:8 112:9	29:16,19 34:10,21
110:23	144:25 148:24	95:20,21 159:12	114:16	41:18,25 42:3,23
<b>stock</b>	<b>students</b>	<b>suggests</b>	<b>suspicion</b>	47:9 59:25 66:16
50:19	84:10 94:10	149:5 150:18	13:4 15:12	66:19 68:17 75:18
<b>stop</b>	148:19 149:14	151:18	<b>sutton</b>	81:19 82:20 90:13
10:5 118:9 121:8	150:22 151:4,12	<b>suicide</b>	1:7,7 3:12,12 6:10	109:9 110:23
133:5	151:16 152:6	135:15	6:16,16 8:15,16	121:10,16 125:23
<b>storage</b>	153:13 155:4,5,10	<b>suited</b>	13:7,9,17,19,23	128:9 133:23
62:24	155:13,21,25	155:12,15	15:13,15,19 35:19	143:20 144:24
<b>store</b>	<b>studies</b>	<b>suits</b>	35:25 36:4,6	145:19 148:6,10
154:10 155:7	100:16,17,21	60:8,9	40:13 43:25 45:5	148:13 151:22
<b>straightforward</b>	<b>study</b>	<b>summarize</b>	45:8 49:2,8,12,17	152:2,6,7 162:8
120:10	98:15 99:5,5,11	120:7	50:5,11 51:19	<b>taken</b>
<b>strategies</b>	99:15,16 100:14	<b>supermarket</b>	57:9 58:7 60:24	1:20 2:11 8:20,24
59:19,21 117:19	100:23 101:2,7	12:18	68:4,5,8,14,16	9:17 29:21 53:22
<b>street</b>	<b>stuff</b>	<b>supplement</b>	69:6,19 70:5 71:8	54:11,11 81:25
2:23 134:14	65:15 114:17	20:1 158:1	71:11 72:14 73:20	82:17 91:9 114:15
<b>strike</b>	<b>stuttered</b>	<b>support</b>	74:3,13 75:5,13	123:20 129:7
22:11 23:25 36:7	136:10	71:17 150:4,13	76:8,13,18,25	143:21 145:19
42:10 45:3 59:3	<b>subject</b>	<b>supposed</b>	77:4,8,13,22 78:3	163:4 164:13
68:8 69:18 70:13	40:2 45:5,20 47:1	98:14 99:3 123:10	78:18,19,24,25	<b>takes</b>
73:18 75:1,3,6	72:13 163:5	<b>suppressive</b>	<b>suttons</b>	54:3 123:20
78:17 79:23 90:9	<b>subparagraph</b>	88:8,18,21,25	14:7 75:3,9 77:25	<b>talk</b>
94:7 98:11 101:20	112:1	89:6	78:2,11	36:4,17 40:20
109:18 136:23	<b>subscribed</b>	<b>sure</b>	<b>swear</b>	104:11,11,13
137:17 139:11	163:22	9:3,25 11:20 15:5	7:15	<b>talked</b>

89:6	119:25	<b>theory</b>	22:1,10 28:2 29:9	158:8,20 159:2,16
<b>talking</b>	<b>temple</b>	129:24	31:5 32:15,19,23	159:17
49:1	135:12	<b>thera</b>	33:10,23,24 34:4	<b>thoughts</b>
<b>tape</b>	<b>ten</b>	21:3	34:16 35:11,11,12	64:24
43:25 44:13,16,18	123:15 124:20	<b>therapy</b>	37:1 38:12,22	<b>threatened</b>
44:22 45:2,5,9	<b>tendency</b>	15:23 16:2,6,10	39:8,24 40:3,22	113:10,13
46:2,15,18,19,22	14:3	16:14 21:3,5	41:8 42:24 43:4,7	<b>threatening</b>
47:1,2,3,7,15 82:4	<b>tenets</b>	29:12	43:10 44:4,13	113:15
136:23,24 137:6	83:14	<b>thereabouts</b>	45:20,22 46:17,24	<b>three</b>
137:13 138:1	<b>tenhour</b>	56:24	46:25 51:1,20	61:4,5 104:24
<b>tapes</b>	129:19	<b>thesaurus</b>	52:6 55:4,5,21,25	129:9,21
118:7 133:4	<b>tenzin</b>	95:16	56:3,8,12,12	<b>threepage</b>
<b>taping</b>	161:15	<b>thing</b>	57:11,17,17 58:12	4:14 107:5,13
45:21 46:8,9	<b>term</b>	7:11 24:21,22	59:7 61:13 62:2	<b>till</b>
<b>taught</b>	88:8,18 114:5	53:1 57:12,12	63:11,19 64:5,14	9:23
14:15,17,19,20	131:25 132:9	63:12 91:25 94:15	64:15 68:4,18	<b>time</b>
84:3,6,7,25 85:4	134:9,16 135:5,8	114:14 124:6	69:4,22 70:12,17	6:7,11 11:24
103:9,12 104:18	147:17	125:8,20 127:11	71:23 72:16 73:3	13:23 15:18,22
106:19 153:3	<b>termed</b>	129:13 149:7	74:10 80:3,22	16:1,11 18:5 19:6
<b>taxes</b>	92:9	<b>things</b>	83:12,23 84:12,15	19:17,20 20:2
21:11,16,17,19,21	<b>terminology</b>	12:2,7,7,9,19	88:1,5,20 89:20	24:7,16,25 25:22
21:25 22:1	106:22	14:12 16:17 18:15	89:25 93:3 95:8	27:5,8 29:3 35:22
<b>teach</b>	<b>terms</b>	24:18,24 25:12	99:20 102:21	36:6,12,21 37:12
26:18 51:25 85:10	83:25 135:1	26:17 50:2,17,19	104:3,4,6 105:19	39:7 40:5,12,24
85:13,15 102:9	141:24 142:21,23	52:19 53:7,10,18	106:6 108:14	41:2 47:15 49:16
<b>teaches</b>	143:4,15,19	61:14 62:23 63:7	110:20,20 111:9	49:24 51:18 54:12
103:16	144:25 151:16	68:21,22 69:11	119:11 120:9,15	58:2 72:23 79:10
<b>teaching</b>	<b>testifies</b>	70:20 71:17 72:11	125:13,18 129:12	80:12,17,18,20,21
14:22 86:25 87:16	8:11 82:9	85:7 86:12 87:5	129:17 137:9	80:24 81:16 82:5
106:12 150:25	<b>testify</b>	87:22 89:19 90:2	139:1 140:3,11	90:7 91:9 92:4
<b>teachings</b>	164:9	95:17 96:5 99:5	142:7 143:5 150:7	94:24 95:8 99:1
113:4	<b>testimony</b>	101:1 102:11	154:13,19,19	100:25 101:14
<b>technical</b>	148:1 150:22	106:6,7,8 108:7,9	156:16,21,22	104:13,22,25
135:1,3,7	163:4 164:12	110:1,19,19	157:3,4 158:18,25	105:4 106:15
<b>technology</b>	<b>testing</b>	113:16 114:7,17	159:9,10 160:14	109:9 115:9
36:2 52:17	53:9	114:21 115:2	<b>thinking</b>	121:23 128:16
<b>tedious</b>	<b>tests</b>	116:10,11 119:3	26:10,16 27:7,16	137:23 139:6
65:10	52:18	119:12 122:15,17	50:17 120:5	142:9 147:6,18
<b>telephone</b>	<b>text</b>	122:18,23 124:1,5	126:22	150:14 151:2
44:1	103:18	124:11 127:1,2,15	<b>thinks</b>	153:19 154:11,18
<b>tell</b>	<b>thank</b>	128:8 129:23	61:18	156:20 159:15
14:6 16:1 28:7	10:18 51:15 55:12	131:2 134:4 143:5	<b>third</b>	160:15 161:24
38:14,16 41:4	81:21 114:17	154:9 158:9	9:9 78:22	164:14
54:25 69:6,17	115:20 119:15	160:17 161:10	<b>thomas</b>	<b>times</b>
71:6,7 110:24	127:19 133:2	<b>think</b>	3:5,15 6:21,24	21:13 24:3 49:22
119:5,8 122:3	146:5 162:10,11	8:23 9:3,3 12:9	<b>thought</b>	50:3 72:9 80:19
126:23 130:8	<b>thanks</b>	14:1 15:4,12 17:3	4:16 42:14 57:12	105:16 115:2
<b>telling</b>	106:16 119:15	17:5,17 18:2,4,6,8	60:14 65:7 96:2	157:8 159:13
69:9	<b>theoretical</b>	18:15,17,22 20:14	116:7,15 126:10	<b>timesunion</b>
<b>tells</b>	84:21 119:23	20:24 21:17,18,23	131:13 137:25	140:21 160:23

<b>timing</b> 58:8	<b>townhouse</b> 102:15,20	<b>tried</b> 137:3,7	139:12 159:14	77:12,18 85:9
<b>title</b> 23:7,9 96:3	<b>trade</b> 16:17 106:19,23	<b>trouble</b> 111:7 145:6,8,25	<b>types</b> 24:14	86:16 88:17 90:21
<b>titles</b> 23:11 95:14,16	106:25 107:23	<b>true</b> 12:9 13:24 43:19	<hr/> <b>U</b> <hr/>	91:25 106:18
<b>today</b> 8:19 9:19 10:4,10	108:1,5,9,10	60:1 119:6 122:9	<b>uhhuh</b> 12:13 27:9 37:20	107:22 112:14,24
13:21 43:25 45:18	109:23,24 110:4,9	122:18,19 164:12	54:24 74:12 112:7	129:25 131:6
75:21 85:17 95:19	110:12,14,15	<b>trunk</b> 126:24 129:9	115:10,17 117:10	132:16,17 135:5
116:20 147:18	111:18 114:5,20	<b>truth</b> 59:23 111:13	120:14 127:11	137:19,23 144:1
156:18	115:11,18 117:7	120:1,3 164:9,10	130:11 148:21	<b>understood</b> 70:1 71:8 119:15
<b>today's</b> 6:6 48:14 105:24	117:14,15,17,17	164:10	150:5,16 153:10	137:5
<b>told</b> 15:4,8,21 16:10	120:2,10,16 122:3	<b>try</b> 10:2 24:20 35:10	154:1	<b>undertake</b> 147:15
22:16 28:7 29:20	122:4,6,8,12,15	52:25 75:6 145:9	<b>ulsamer</b> 2:22 119:18	<b>unfeasible</b> 159:1,22,23
30:7 31:11,19,22	122:16 123:4,6,8	159:21	<b>ultimate</b> 23:4 157:14	<b>unique</b> 106:25 108:17,25
31:24 33:19 47:6	123:11 124:6,18	<b>trying</b> 24:16 55:4,5 73:5	<b>ultimately</b> 65:23 97:25	112:15 128:9
52:23 53:17 56:6	124:19 126:18,21	94:9 132:16	104:15 119:9	132:21
56:9,10,12,13,14	126:23,25 127:3,4	<b>turn</b> 51:13 60:3,4	156:13	<b>united</b> 1:1 4:10 93:8
56:18 58:2 61:22	127:5,6,10,10,25	<b>turned</b> 41:19 158:25	<b>um</b> 53:4 104:3 155:15	<b>university</b> 15:25
61:23 68:15,15,16	128:25 129:7,15	<b>turning</b> 66:24 67:21 153:7	<b>unattended</b> 137:16	<b>unrest</b> 160:14
68:22 69:3 71:17	130:12,17 131:1,4	<b>twenty</b> 25:9 79:11	<b>underline</b> 117:7 126:17	<b>untrue</b> 141:8
71:21,22 72:7	131:5,7,9,24	<b>twice</b> 36:5	129:23 130:14	<b>updated</b> 154:20
74:13 75:13 76:1	132:3,5,8,10,18	<b>two</b> 8:23 24:19 32:23	132:8,19,20	<b>uphold</b> 72:5
88:21 92:23 130:8	147:11,16	45:25 61:5 80:2	<b>underlined</b> 122:3 125:9,21	<b>upset</b> 71:20
130:20 159:7,9	<b>trademark</b> 4:10 93:8	95:21 110:1,23	126:19 127:1,12	<b>use</b> 26:13 73:25 74:5
<b>tom</b> 73:3 133:13	<b>train</b> 161:21	124:10 134:11	129:12 130:6,19	74:9 86:19 87:24
<b>tomorrow</b> 144:17 145:10,23	<b>trainer</b> 19:23	137:9 140:3	<b>underlining</b> 119:3 121:1	88:20 94:15 105:8
145:24 147:19	<b>training</b> 18:13 19:8,13	<b>twohour</b> 27:25 28:1 128:3	<b>understand</b> 10:1,1 37:11	113:13 130:1
148:5 158:2 162:4	30:12 123:16,18	128:5,9	52:21 71:23 77:7	137:3 144:8
<b>tompkins</b> 2:21 7:2	124:21,24 125:1,3	<b>twopage</b> 64:15	78:10 90:16 92:15	145:14 155:10,13
<b>toni</b> 140:5 155:2	128:13	<b>twosided</b> 143:24	112:21,22 119:11	157:5
<b>tool</b> 84:16,17,18,24	<b>trainings</b> 18:19 161:21	<b>twothirds</b> 150:6	120:12 122:7	<b>useful</b> 63:1 134:22
115:7 152:3	<b>transcript</b> 1:22 7:19,23	<b>type</b> 24:9,10 53:9	132:15 145:12	<hr/> <b>V</b> <hr/>
<b>tools</b> 21:7 161:21	44:18 47:3 54:22	74:14 83:19 87:5	147:4	<b>valuable</b> 161:12
<b>top</b> 96:7 113:12 123:5	76:15 78:8 106:10	87:21 88:11,15	<b>understanding</b> 15:14 19:15 22:12	<b>value</b> 147:20
145:2,4,12	113:21 163:3		22:15 28:10 30:15	<b>values</b> 111:2,23 112:6
<b>topic</b> 50:4	164:12		30:25 38:3 44:22	
<b>total</b> 12:12	<b>translated</b> 104:8,15		46:20,23 53:10	
	<b>tree</b> 153:9 158:21		68:2 69:7 72:1,4	
	159:1		75:9 76:25 77:8	
	<b>tribute</b> 90:3,4			



<b>vanguard</b> 23:10 51:21,22 52:4 80:8,11 95:10,18 96:9 114:17	49:21,21 54:8	124:9 129:23 138:7 143:8 144:20 150:6 158:11,21 159:2	<b>willingness</b> 30:21	<b>wrong</b> 53:11 133:21
<b>various</b> 17:5 26:20 103:25	<b>volume</b> 1:20	<b>ways</b> 125:4 128:4,5,7 158:11	<b>winter</b> 159:17 160:16	<b>wrote</b> 103:23,24
<b>ventures</b> 36:3 52:13	<b>vs</b> 1:6,12 2:4	<b>wear</b> 94:10 157:11	<b>witness</b> 4:2 7:1,16,22 55:9 55:12 66:21 81:23 87:8 91:17 92:13 92:17,22 93:5 96:22 97:3,6 105:18 107:8 109:4,11 118:9,14 118:18,22,24 120:25 121:14,23 123:10 127:15,19 133:5 144:11 146:12 148:2,6,9 157:21 158:5 162:6,9,15 164:9	<hr/> <b>X</b> <hr/>
<b>verbally</b> 10:7 37:22	<b>w</b>	<b>website</b> 56:22 57:2,21,23 57:25 59:14 62:1 76:19 77:2,5,10 77:14,16,24 78:2 78:4 114:25 115:9 115:10,17,23 116:1,5,7,12,13 116:16 117:1,3	<b>woman</b> 71:14 139:13	<b>xerox</b> 148:11
<b>verify</b> 53:6	<b>wachenfeld</b> 2:21 7:3	<b>websites</b> 55:18 107:20 115:3 131:21 147:2	<b>word</b> 65:13 74:1,5,9 135:9 144:10 150:3	<b>xi000918</b> 164:23
<b>version</b> 142:18	<b>wait</b> 7:17 9:23 10:5,25 10:25 125:10	<b>wedlock</b> 71:11,13	<b>wordings</b> 128:8	<hr/> <b>Y</b> <hr/>
<b>viable</b> 131:4	<b>walk</b> 26:16 27:7	<b>wednesday</b> 1:20 2:16	<b>words</b> 27:15 73:9 78:11 85:12 110:9	<b>yahoo</b> 80:3,6,7 81:12,12
<b>video</b> 6:7 32:8,11 137:4	<b>walked</b> 25:4	<b>week</b> 26:10,11 51:21,22 52:4	<b>work</b> 35:13 50:16 86:1 90:3,4,5 105:12	<b>yeah</b> 13:12 16:5 25:17 39:1 41:8 49:25 55:8 62:13 64:11 72:9 97:12 105:2 127:8 131:16 135:10 148:8 158:20 159:13 162:2
<b>videoconference</b> 1:23	<b>walking</b> 71:18	<b>wellspring</b> 1:8 3:17 6:23	<b>worked</b> 137:5	<b>year</b> 17:23 18:3,5 27:10,12,18 28:2 32:19 36:5 51:21 56:2 57:19,20,23 159:17
<b>videographer</b> 3:24 6:6 7:15 9:21 47:14 51:13 82:3,6 97:5 118:6 118:16,23 126:4 133:3,7 162:12	<b>want</b> 16:16,18 26:1 29:3 30:21 35:14 35:16 38:10 41:9 52:25 68:19 71:18 79:6 91:18 95:11 95:22,22,25,25 98:18 112:25 118:2,3,9 123:6 126:7,16 133:5 137:2 144:3,11 145:22 147:12	<b>west</b> 1:23	<b>works</b> 19:25 87:5,21 89:12,15	<b>years</b> 27:16,18,22 37:1 54:8,18,19,20 62:10 70:20 72:22 90:17,19,20 105:3 132:6
<b>videotape</b> 137:1	<b>wanted</b> 19:12,22,24 42:2 43:17 46:2 52:17 64:21 65:6,7 68:17,18,20,21 71:21 75:14 96:3 121:2 137:1 139:19 140:4	<b>weve</b> 10:15,21 27:17 131:11 149:24 152:17,20	<b>world</b> 41:18 51:24	<b>york</b> 3:20,20 8:10 36:10
<b>videotaped</b> 1:19 136:25 137:2	<b>wants</b> 20:24 40:19 46:1 125:15	<b>whens</b> 36:21	<b>write</b> 12:8 62:23 103:19 119:10,10 136:6	<b>yup</b> 148:6
<b>view</b> 21:11,15	<b>watts</b> 93:16	<b>white</b> 157:11	<b>written</b> 48:2,7 87:1,17 104:9 122:20	<b>yusko</b> 141:3
<b>views</b> 22:4	<b>way</b> 7:8 9:25 19:24 41:22 48:1 59:7 70:16 71:2 79:22 88:17 92:21,24 98:17 112:22 119:23 120:7	<b>whove</b> 113:6		<hr/> <b>Z</b> <hr/>
<b>violates</b> 110:7		<b>william</b> 2:21 7:2		<hr/> <b>0</b> <hr/>
<b>violating</b> 53:1 92:14				<b>00</b> 162:1
<b>violation</b> 110:7				<b>01</b> 133:8
<b>visited</b> 13:22 138:20				
<b>visits</b> 49:20				
<b>vitamins</b> 154:9				
<b>voice</b> 26:19 102:9				
<b>volleyball</b>				

<b>03</b> 4:9 66:12	<b>141</b> 4:19	125:22,22	7:21	130:2
<b>06cv01051</b> 1:4	<b>146</b> 4:21	<b>2000</b> 80:8 142:17,19 154:17	<b>34</b> 126:5	<hr/> <b>6</b> <hr/>
<b>07039</b> 1:24	<b>149</b> 4:23	<b>2001</b> 17:23 18:4 23:1 23:18 24:1,5 25:7 25:16 26:12 29:20	<b>35</b> 47:15	<b>6</b> 4:8 66:25 162:1
<b>07068</b> 3:16	<b>15</b> 121:11	30:2,19 31:1,9 32:17 33:3,11,15 34:9,12 35:6,20 36:21 79:21	<b>3661</b> 4:17 126:11	<b>65</b> 3:15
<b>07102</b> 2:24	<b>152</b> 4:24	<b>20012002</b> 155:24	<b>3682</b> 4:21 146:17	<b>66</b> 4:9
<b>079321047</b> 3:6	<b>16</b> 123:15 124:14,20	<b>200220032004</b> 49:16	<b>3hour</b> 130:3	<hr/> <b>7</b> <hr/>
<b>079621981</b> 3:11	<b>1633</b> 3:19	<b>2003</b> 38:6 56:3 69:12 74:7,16,21 107:14 135:24	<hr/> <b>4</b> <hr/>	<b>70s</b> 135:15
<hr/> <b>1</b> <hr/>	<b>16day</b> 41:19 42:1,3,5 152:6	<b>2004</b> 92:9 93:17	<b>4</b> 2:23 17:18 121:11 125:22 126:5 153:7 155:20 157:6	<hr/> <b>8</b> <hr/>
<b>1</b> 12:5 153:6	<b>16hour</b> 130:1	<b>2007</b> 25:22 26:22	<b>40</b> 4:24 27:11 152:12	<b>8</b> 4:3,9 66:12
<b>10</b> 2:17 26:10,15 98:14,20,23 99:3 99:15	<b>18</b> 4:9 66:12 69:12	<b>20072008</b> 13:11 25:24	<b>41</b> 164:7	<b>80</b> 27:11 64:17
<b>100</b> 2:23	<b>18th</b> 148:14 155:19 161:22	<b>2008</b> 25:22 26:22	<b>425</b> 12:6	<b>8331100</b> 3:20
<b>100196708</b> 3:20	<b>1987</b> 103:5	<b>2009</b> 1:20 2:16 6:7 163:4	<b>455</b> 18:12 34:24 43:10	<hr/> <b>9</b> <hr/>
<b>101</b> 5:3	<b>1993</b> 9:2	<b>212</b> 3:20	<b>48</b> 5:3	<b>9</b> 149:19 153:8 162:4
<b>106</b> 5:4	<b>1994</b> 9:11	<b>22</b> 164:7	<b>49</b> 118:17	<b>93</b> 4:11
<b>107</b> 4:14	<b>1995</b> 9:4	<b>231</b> 4:11 93:10	<hr/> <b>5</b> <hr/>	<b>97</b> 4:13
<b>108</b> 4:23 149:21	<b>1997</b> 33:10,15	<b>24</b> 2:17	<b>5</b> 17:17 133:8 162:13,17	<b>973</b> 4:13
<b>11</b> 1:20 2:16 6:7 47:15 163:4	<b>1998</b> 83:11,12,22	<b>26</b> 93:17	<hr/> <b>5</b> <hr/>	<b>9943510</b> 1:24
<b>110</b> 1:15	<b>1999</b> 154:13,16	<b>3</b> 8:10 82:4 118:17 148:17 153:23	<b>500</b> 2:15 3:5	<b>9943621</b> 1:25
<b>113</b> 5:4	<b>19992000</b> 91:8	<b>30</b> 7:8,20 8:3,4 79:9 90:17,19,20 162:4	<b>51</b> 82:6	
<b>12</b> 79:9 114:19,23 154:17	<b>19th</b> 161:20	<b>30day</b>	<b>5380800</b> 3:11	
<b>12065</b> 8:10	<hr/> <b>2</b> <hr/>		<b>5497370</b> 3:6	
<b>126</b> 4:17	<b>2</b> 1:4 47:15 67:21 82:6 111:25		<b>56</b> 162:13,17	
<b>140</b> 5:5	<b>20</b> 25:8,15 26:15 64:15 120:18		<b>570</b> 1:23	
			<b>5972508</b> 3:16	
			<b>5day</b>	