

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF COLUMBIA

- - -

TRITA PARSI and NATIONAL :
IRANIAN AMERICAN COUNCIL :
Plaintiffs :
V. : Civil No. :
DAIOLESLAM SEID HASSAN, : 08 CV 00705 (JDB)
Defendant : Page 1-81

- - -

Wednesday, September 1, 2010

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Continued deposition of Emily L. Blout was taken at the Law Offices of Sidley Austin, LLP, 1501 K Street, NW, Sixth Floor, Washington, DC 20005 commencing at 10:09 a.m. before Sherry L. Brooks, Professional Court Reporter and Notary Public, in and for the District of Columbia.

RB 4054

* * *

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20 (Exhibits 29 and 38 retained by counsel.)
21 (Exhibits 30 through 37 attached to the transcript.)
22

1 PROCEEDINGS
2 * * * * *
3 EMILY L. BLOUT
4 was recalled for examination by counsel and, after
5 having been duly sworn by the Notary, was examined
6 and testified as follows:
7 (Exhibit Number 29 was marked for
8 identification and was attached to the deposition.)
9 EXAMINATION BY COUNSEL FOR DEFENDANT
10 BY MR. KAPSHANDY:
11 Q. Good morning, Emily. You understand from
12 the time we were together here, I believe, back last
13 December that you're under oath.
14 And I'll be asking you certain follow-up
15 questions in light of some additional documents that
16 were produced by NIAC since your deposition, but
17 before we begin, I just want to remind you that the
18 same rules are in effect.
19 If you have any questions and you don't
20 understand me, you need to take a break, please let
21 me know and we'll be glad to accommodate you, okay?
22 A. Yes.

1 Q. And that was one of the other things I was
2 going to remind you of. You have to remember to
3 answer affirmatively and not just shake your head up
4 and down because the court reporter can't take that.
5 And I'm going to try to get through this
6 as expeditiously as I can and limit myself to the
7 stuff that was produced by NIAC since your last
8 deposition, okay?
9 A. Okay.
10 Q. Before we get into anything of substance,
11 since your last deposition, I need to know if you
12 have talked with anybody at NIAC or NIAC's counsel?
13 And that was on December 8th of 2009.
14 A. I spoke with Trita Parsi.
15 Q. And how was that and when was that?
16 A. That was a matter -- I spoke with him last
17 week, and it was a matter of client/attorney (sic)
18 privilege. I had an attorney on the phone with me.
19 Q. Trita Parsi is not your attorney, is he?
20 You're not suggesting that?
21 So my question is: you had a conversation
22 with Trita Parsi, and you're saying an attorney may

1 have been present?
 2 A. Yes.
 3 Q. And who was that?
 4 A. Michael Signer.
 5 Q. And who is he?
 6 A. He is a friend of mine.
 7 Q. I'm sorry. Could you speak up just a
 8 little bit?
 9 A. He is a friend.
 10 MR. KAPSHANDY: Okay. Let's go off the
 11 record.
 12 (Discussion held off the record.)
 13 BY MR. KAPSHANDY:
 14 Q. You've had a chance to consult with your
 15 attorney, and I don't want to ask you about that.
 16 But for the record, I understand that you do have an
 17 attorney here present with you today, and that's Mr.
 18 Wilson, correct?
 19 A. Correct.
 20 Q. And you're not being represented by either
 21 Mr. Parsa or Mr. Nelson or anyone else from the
 22 Pishevar firm, are you?

1 A. No.
 2 Q. Now, this conversation you had with Trita
 3 Parsi was about a week ago, you say?
 4 A. Correct.
 5 Q. And what was the subject of that
 6 conversation?
 7 A. It was a short conversation and it was
 8 regarding attorney's fees.
 9 Q. And who else was on the phone with you?
 10 A. Michael Signer.
 11 Q. And where is he? Is he an attorney in DC
 12 or something?
 13 A. He is an attorney.
 14 Q. At what firm?
 15 A. His own firm. It's called Madison Group.
 16 Q. And who initiated that call, you or Trita
 17 Parsi?
 18 A. I did.
 19 Q. And what did you ask Trita Parsi?
 20 A. I asked him about attorney fees --
 21 Q. Specifically --
 22 A. -- for my representation.

1 Q. I got you. I mean, you just weren't
 2 asking him generally about attorney's fees, but it
 3 had to do with this case?
 4 A. Correct.
 5 Q. Okay. And did you ask him if NIAC would
 6 reimburse you for your attorney's fees?
 7 A. Not exactly.
 8 Q. Well, let's get right to the point. What
 9 did you ask him about attorney's fees?
 10 A. I asked him if he would pay for the
 11 attorney's fees for this deposition.
 12 Q. Or he, NIAC?
 13 A. NIAC.
 14 Q. And what did he say?
 15 A. No.
 16 Q. Other than that, any other conversations
 17 with anyone at NIAC?
 18 A. No.
 19 Q. Now, since your last deposition, you
 20 understand that NIAC has produced some calendar
 21 records and E-mails; is that correct?
 22 A. Can you elaborate?

1 Q. Well, you understand we're here because
 2 certain materials were produced after your deposition
 3 that we didn't have a chance to ask you about?
 4 A. That's my understanding, correct.
 5 Q. And in fact, we sent to your counsel some
 6 of those records before this deposition. Are you
 7 aware of that?
 8 A. Yes.
 9 Q. I mean, I'm not trying to be tricky. I
 10 just want to speed this up and get right to the heart
 11 of the matter to find out if, in fact, you reviewed
 12 any of those records?
 13 A. I briefly glanced at them.
 14 Q. And those were a printout or maybe an
 15 electronic version --
 16 A. An electronic version.
 17 Q. Let me finish, please -- electronic
 18 version of your calendar records in Excel format,
 19 correct?
 20 A. Correct.
 21 Q. And for the record, we've marked as
 22 Exhibit 29 to your deposition a printout of the

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1 entire Excel file that was produced to us by NIAC.
2 And perhaps you didn't print it, but if by
3 looking at that -- if you could confirm to us that
4 that looks to be the same set of Excel calendar
5 records that we sent to your counsel and he showed to
6 you in the last couple of months?
7 A. I have no way of confirming that this is
8 the exact same one.
9 Q. I hate to go through each and every entry.
10 Does it look like --
11 A. It appears -- it looks in a similar
12 format.
13 Q. For example, it starts on May 16th, 2007
14 and it ends on June 1st, 2010 if you turn to the very
15 last page. And that being the case, does that kind
16 of correspond with when you worked at NIAC?
17 MR. WILSON: June 1st, 2010?
18 BY MR. KAPSHANDY:
19 Q. Turn to the very last page. You'll see
20 June 1, 2010.
21 MR. WILSON: I don't see June 2010, at
22 least on my copy.

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1 MR. KAPSHANDY: 6/1/2010, counsel?
2 MR. WILSON: It says 6/1 --
3 MR. KAPSHANDY: 2010. It was a word wrap
4 issue.
5 MR. WILSON: Oh, okay. She wasn't working
6 at NIAC.
7 MR. KAPSHANDY: Well, that's one of the
8 questions I had.
9 BY MR. KAPSHANDY:
10 Q. I believe you told us you stopped working
11 at NIAC sometime in the spring of 2010?
12 A. No.
13 Q. When, 2009?
14 A. It was around April or May in 2009.
15 Q. That's my recollection and I can get it
16 from your previous deposition. I don't want to trick
17 you, but the one question I had is, do you have any
18 idea how it was that there are calendar entries in
19 your calendar for more than a year after that?
20 And most of them say interdepartmental
21 meeting, if that helps.
22 MR. WILSON: The question is, do you know

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1 what happened to your calendar after you left NIAC?
2 Isn't that your question, Tim?
3 BY MR. KAPSHANDY:
4 Q. Right. Why were there still so many
5 entries that say Emily Blout after May of 2009? And
6 most of them say interdepartmental meeting, but there
7 are a few others.
8 A. The interdepartmental meeting was
9 scheduled on my Outlook calendar as a repeating event
10 every week, so it could have just kept on repeating.
11 Q. Just kept on going even after you left?
12 A. I don't know what the other entries are
13 that you're referring -- I don't know what you're
14 talking about.
15 Q. Example, look at June 25, 2009.
16 A. I don't know. I don't see anything.
17 Q. It says: Submit NIAC memos to Alex Toma
18 (phonetic) for eBulletin. Do you see that?
19 A. That's also a reoccurring --
20 Q. Okay. That's a repeat, okay. That helps.
21 Let me ask this about how the Outlook calendar system
22 worked there at NIAC.

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1 Did it reside only on your computer or did
2 other people have the ability to add stuff to your
3 calendar over a network?
4 MR. NELSON: Objection.
5 You can answer, if you know the answer.
6 THE WITNESS: To my knowledge, it resided
7 only on my calendar unless I were to share my
8 calendar with others, but you still could not enter
9 -- no one else could enter something into my --
10 without me accepting it.
11 BY MR. KAPSHANDY:
12 Q. Well, the second part was, so you could
13 share entries on a calendar? Somebody could invite
14 you to an event over a network, and then if you
15 accepted it, it would show up on your calendar?
16 A. Correct.
17 MR. NELSON: Objection.
18 BY MR. KAPSHANDY:
19 Q. Now, what type of computer did you work
20 with? Was it a laptop or a desktop is all I'm
21 getting at, not the Dell model number or anything
22 like that.

1 A. Desktop.
 2 Q. And did anybody at NIAC work with a
 3 laptop?
 4 A. I don't have -- I couldn't answer
 5 definitively.
 6 Q. Did you ever see Trita Parsi working with
 7 a laptop?
 8 MR. NELSON: Objection. This goes beyond
 9 the scope of what we're here for today. You were
 10 limited to these calendars and the information that
 11 relates thereto.
 12 You've strayed into an area that's already
 13 been dealt with by the judge, and I think you're
 14 going beyond the scope of what the judge has
 15 permitted in this case.
 16 MR. KAPSHANDY: He didn't specifically
 17 limit it to anything other than new matters raised
 18 after, counsel, and this is directly relevant to the
 19 calendars, and that's what I'm getting at.
 20 MR. NELSON: It's not relevant to the
 21 calendars.
 22 BY MR. KAPSHANDY:

1 MR. WILSON: If you know, you can answer.
 2 THE WITNESS: Yes, sometimes.
 3 BY MR. KAPSHANDY:
 4 Q. Did he have a Blackberry?
 5 A. Yes.
 6 Q. Was he able to send you E-mails from his
 7 Blackberry?
 8 A. Yes.
 9 Q. Was your computer regularly backed up by
 10 anyone at NIAC, either by you or anyone else, to
 11 preserve your files in case of a failure?
 12 MR. NELSON: Objection.
 13 THE WITNESS: I can't remember.
 14 BY MR. KAPSHANDY:
 15 Q. You don't recall if they have any policies
 16 or procedures for that?
 17 A. We had a shared drive which I regularly
 18 updated with my files.
 19 Q. Yes. How did that work? Mr. Elliott told
 20 us a little bit about that, but what did you update
 21 on that shared drive?
 22 A. I put all of my files on the shared drive.

1 Q. Are you able to answer, Ms. Blout?
 2 A. I don't know. I don't have any memory.
 3 Q. Did Trita Parsi travel a lot? I mean, was
 4 he in the office every day?
 5 MR. NELSON: Objection. Relevance.
 6 MR. WILSON: You can answer.
 7 MR. NELSON: Vague.
 8 THE WITNESS: Can you rephrase your
 9 question? I'm not sure what you're saying.
 10 BY MR. KAPSHANDY:
 11 Q. On average, how many days was he in the
 12 office versus out of the office?
 13 MR. NELSON: Objection. Vague. What time
 14 period?
 15 MR. KAPSHANDY: While she was employed
 16 there, counsel.
 17 THE WITNESS: I couldn't give you an
 18 average. It varied.
 19 BY MR. KAPSHANDY:
 20 Q. And he traveled around the country and
 21 around the world. Is that fair to say?
 22 MR. NELSON: Objection. Foundation.

1 Q. By all, do you mean your doc (phonetic)
 2 and your Excel files or did you also put your Outlook
 3 files on there?
 4 A. Everything.
 5 Q. Including Outlook?
 6 A. I don't know.
 7 Q. Which would include your E-mails and your
 8 calendars?
 9 A. I don't know.
 10 MR. NELSON: I'm sorry. I couldn't hear
 11 the answer.
 12 THE WITNESS: I don't know.
 13 BY MR. KAPSHANDY:
 14 Q. After you left in May, NIAC's banking
 15 records reflect that you received checks in June for
 16 \$1,000 and in August for \$1,115. Can you tell us
 17 what those were for?
 18 MR. NELSON: Objection. Foundation.
 19 THE WITNESS: Those were for additional
 20 contract consulting work.
 21 BY MR. KAPSHANDY:
 22 Q. What kind of consulting work?

1 A. I had been asked to advise and continue to
2 support NIAC's staff in the transition after my
3 departure, so I did some limited hours.

4 Q. Did you submit an invoice or time records
5 or anything? How did that work?

6 A. I don't recall.

7 Q. If you could in your calendar, please,
8 turn to 9/8/2008. It's kind of right in the middle
9 -- excuse me -- 9/18/2008.

10 Do you have that page in front of you?

11 A. Yes.

12 Q. There's an entry that says: How to
13 freaking use SF with an exclamation point after it.
14 It sounds kind of like an emotional issue. Can you
15 help us out? What is freaking SF?

16 A. SF refers to sales force.

17 Q. Sales force?

18 A. Yes.

19 Q. Sales force is what?

20 A. It's a member or constituent outreach
21 program.

22 Q. A software program?

1 A. Correct.

2 Q. And it enables you to keep track of
3 something?

4 A. I'm not sure what you're asking.

5 Q. Well, tell me how it works. It's a
6 software program and you enter stuff in it, right?
7 And apparently from your note here, it involved a
8 little bit of training, at least you found it a
9 little bit frustrating for some reason.

10 Why do you call it freaking SF?

11 A. I don't recall this.

12 Q. Okay. Well, you were trained to use the
13 SF software to do something, right?

14 A. I don't recall.

15 Q. You don't recall the training?

16 A. I don't recall if I was trained or not.

17 Q. Do you recall the SF software and what it
18 was used for?

19 A. Vaguely.

20 Q. Well, tell me what you do recall about it.

21 A. I already did tell you.

22 Q. That it's for tracking --

1 A. Member outreach E-mails.

2 Q. What was the purpose of it? I mean, who
3 was in charge of it?

4 A. I was not in charge of it.

5 Q. Who was in charge of it at NIAC?

6 A. I don't recall.

7 Q. Well, in the entry, it also says Patrick
8 Disney was copied on it. Was he somehow involved
9 with the SF software?

10 A. I don't recall.

11 MR. KAPSHANDY: Let me hand you another
12 document which we'll mark as your Deposition Exhibit
13 30.

14 (Exhibit Number 30 was marked for
15 identification and was attached to the deposition.)

16 BY MR. KAPSHANDY:

17 Q. Go ahead and take a look at it, please.

18 MR. NELSON: Counsel, was the composite
19 exhibit of the calendars 29?

20 MR. KAPSHANDY: Yes.

21 BY MR. KAPSHANDY:

22 Q. Okay. Now, maybe to help you out a

1 little, Emily, I'll represent for the record that
2 this document was produced to us by NIAC and the
3 electronic information shows that you're the author
4 on or about December 3, 2008.

5 Is this agenda for staff meeting the type
6 of document that you recognize?

7 A. I recognize it.

8 Q. Okay. How is it you recognize it? Did
9 you regularly have agendas for the staff meetings?

10 A. We regularly were given agendas for the
11 staff meetings.

12 Q. Well, who did those?

13 A. The office manager.

14 Q. Who was that?

15 A. It appears at this point it was Shamie.

16 Q. Shamie who?

17 A. I don't recall her last name.

18 MR. NELSON: Counsel, is it your
19 representation that this document was produced after
20 Ms. Blout's last deposition?

21 MR. KAPSHANDY: Absolutely.

22 MR. NELSON: Thank you.

1 BY MR. KAPSHANDY:
 2 Q. How often did you have the staff meetings?
 3 A. Usually, once a week.
 4 Q. And was there an agenda for them each
 5 week?
 6 A. Yes.
 7 Q. Who attended these or was required to
 8 attend them?
 9 A. The full staff.
 10 Q. And in 2008, that included, what, you? the
 11 legislative assistant? Who else?
 12 A. In 2008, we had a very limited staff.
 13 Q. Let's take just this one here, December
 14 2008.
 15 A. I don't recall specifically.
 16 Q. When did Patrick Disney start working as
 17 your assistant?
 18 A. I don't recall specifically, but I know it
 19 was after 2008.
 20 Q. Now, I don't want to trick you here, but
 21 NIAC has produced Mr. Disney's calendar records that
 22 go back to July 2008. Would that maybe refresh your

1 A. When he was here, correct.
 2 Q. And were they generally on Monday of every
 3 week?
 4 A. Generally, yes.
 5 Q. And what it would appear from this
 6 document is that everybody was informed as to what
 7 was going on that week generally or maybe even with
 8 some detail. There's quite a bit of detail in this
 9 one which we've marked as Exhibit 3, correct?
 10 A. Correct. This is -- it's not all
 11 inclusive because it was created by the office
 12 manager, so people would add on during the course of
 13 the discussion, but this was generally the task I had
 14 for the week.
 15 Q. And under other, there's an entry that
 16 says: Enter donations into SF. Do you see that?
 17 A. Yes.
 18 Q. Is that the same SF sales force software
 19 that you were talking about?
 20 A. Correct.
 21 Q. Do you know who was supposed to be
 22 entering that stuff into sales force?

1 recollection as to when he started? Maybe you're
 2 mixed up on the years.
 3 A. It could be. I don't have a good memory
 4 of three years ago, four years ago.
 5 Q. Well, if it helps, we can use some
 6 documents to refresh your recollection.
 7 You'll recall at your last deposition Mr.
 8 Disney did a memo to you about lobbying in July of
 9 2008. I can get it out and show it to you, if that
 10 helps. Would you like me to?
 11 MR. WILSON: If you want to represent that
 12 he was there in July of 2008, why don't we just go
 13 with that?
 14 BY MR. KAPSHANDY:
 15 Q. I'm not trying to make this difficult. I
 16 just want to give you some context as to who was
 17 there in 2008, the latter half of the year -- who
 18 might have attended these staff meetings. I'm just
 19 trying to figure out how the staff meetings worked.
 20 A. When we had staff meetings, everyone was
 21 required to attend.
 22 Q. Including Trita Parsi?

1 A. No.
 2 Q. But it was to track member outreach as you
 3 described it?
 4 MR. NELSON: Objection.
 5 MR. WILSON: Answer it, if you can.
 6 THE WITNESS: I don't know what you're --
 7 I'm not sure what you're saying, what you're asking.
 8 BY MR. KAPSHANDY:
 9 Q. Well, you previously said it had to do
 10 with member outreach in tracking those --
 11 A. Correct.
 12 Q. And maybe one of the things it tracked
 13 also was donations from members?
 14 A. Correct.
 15 Q. It also says here, Send flowers to host
 16 committee. Do you see that?
 17 A. Yes.
 18 Q. Were you involved in that? Who is
 19 responsible for that?
 20 A. I don't recall.
 21 Q. Well, who would have been responsible for
 22 sending flowers to the host committee?

1 MR. NELSON: Objection.
 2 THE WITNESS: I don't recall.
 3 BY MR. KAPSHANDY:
 4 Q. And then further down below under tasks
 5 for interns, it says: Enter Emily's meetings and
 6 notes into sales force. Do you see that?
 7 A. Yes.
 8 Q. Now, how did that work? You apparently
 9 had some notes and somebody entered them into sales
 10 force?
 11 A. Correct.
 12 Q. Okay. Tell me a little bit more. What
 13 sort of notes did you give them?
 14 A. Notes.
 15 Q. Notes related to what?
 16 A. My work.
 17 Q. That's good. Your work on what?
 18 A. Issues pertaining to the Iranian/American
 19 community.
 20 Q. It says: Enter meetings into sales force
 21 also. Did sales force also track your meetings?
 22 A. I recall at a time there had been a push

1 Q. And did you ever see this memo at the
 2 time?
 3 A. I don't remember this memo.
 4 Q. Do you recall any discussions at any of
 5 your staff meetings or with anyone at NIAC about the
 6 lobbying rules for meeting with congressional members
 7 and staff?
 8 A. I believe I already answered that
 9 question.
 10 Q. Pardon?
 11 A. I believe I already answered that
 12 question.
 13 MR. WILSON: If you have a memory, just --
 14 THE WITNESS: I don't have a memory.
 15 MR. KAPSHANDY: Let me hand you what we'll
 16 mark as your Deposition Exhibit 32, which is a
 17 composite of several documents that were produced to
 18 us recently by NIAC.
 19 (Exhibit Number 32 was marked for
 20 identification and was attached to the deposition.)
 21 BY MR. KAPSHANDY:
 22 Q. The first page is a March 25, 2008 memo

1 to track my meetings via sales force, but it was so
 2 cumbersome and it was so tedious that I think we gave
 3 up after a while, and I believe that's what this is
 4 referring to, this time period.
 5 Q. How often did you give notes to somebody
 6 to enter into sales force?
 7 A. Rarely. A couple of times.
 8 (Exhibit Number 31 was marked for
 9 identification and was attached to the deposition.)
 10 BY MR. KAPSHANDY:
 11 Q. Let me hand what we'll mark as your
 12 Deposition 31, which is a February 6th, 2008 E-mail
 13 from Ali Scotten to Sara Shokravi regarding lobbying
 14 rules.
 15 MR. KAPSHANDY: Counsel, I will represent,
 16 for the record, this was produced recently as part of
 17 the Talebi, T-A-L-E-B-I, production.
 18 BY MR. KAPSHANDY:
 19 Q. Now, first, if you could tell me, who is
 20 Sara Shokravi and who is Ali Scotten?
 21 A. Sara Shokravi was our events coordinator
 22 and Ali Scotten was our intern at the time.

1 from Nancy Chen at the Alliance for Justice to Babak
 2 Talebi with, it would appear, three separate
 3 attachments.
 4 The first question is, who is Babak
 5 Talebi?
 6 A. He was our -- at one time, our director of
 7 committee outreach.
 8 Q. What did that involve?
 9 A. It involved interacting with members and
 10 the Iranian American community.
 11 Q. Did Babak Talebi have any involvement in
 12 lobbying issues at NIAC?
 13 MR. NELSON: Objection. Foundation.
 14 MR. WILSON: If you know, you can answer.
 15 THE WITNESS: I don't know.
 16 BY MR. KAPSHANDY:
 17 Q. Well, you were the legislative director at
 18 one point in time at NIAC, correct?
 19 A. Correct.
 20 Q. Did you interact -- interface with Mr.
 21 Talebi on any lobbying issues? And by lobbying, I
 22 mean meeting with members of Congress or their staff

1 on various issues of interest to the Iranian/American
 2 community?
 3 MR. WILSON: Objection to the form of the
 4 question. I don't think that's the accurate
 5 description of lobbying. If you want to ask her
 6 about legislative activity, maybe that would be more
 7 appropriate.
 8 MR. NELSON: Objection.
 9 BY MR. KAPSHANDY:
 10 Q. That's fair. Did you have any interaction
 11 with Mr. Talebi with regard to legislative activity
 12 while you were both at NIAC?
 13 A. Can you clarify what legislative activity
 14 means?
 15 Q. Meeting with members of Congress and
 16 staff.
 17 A. What's your question?
 18 Q. Did you have any interaction with Mr.
 19 Talebi about these legislative interactions?
 20 A. What are interactions?
 21 Q. Meetings, Emily, or E-mails.
 22 MR. WILSON: Communications with members

1 you, correct?
 2 A. Regarding our work?
 3 Q. Right.
 4 A. No, it wouldn't.
 5 Q. I mean, I don't want to go through them.
 6 They were just produced last week, and we'll discuss
 7 those with him, but I just want to get a general
 8 sense for your interaction with him on these
 9 legislative issues.
 10 A. I don't recall, and I couldn't tell you
 11 accurately if there were hundreds of E-mails or to
 12 the extent of which we interacted on what you'd call
 13 legislative issues.
 14 Q. In any event, it would appear from this
 15 memo that in March of 2008 Mr. Talebi did some
 16 research on lobbying rules and definitions with an
 17 organization called the Alliance for Justice --
 18 MR. NELSON: Objection. The document
 19 speaks for itself.
 20 BY MR. KAPSHANDY:
 21 Q. -- correct?
 22 MR. WILSON: I'm just concerned that we're

1 of Congress and staff.
 2 I think that's your question. Right, Tim?
 3 MR. KAPSHANDY: Right. I'm not trying to
 4 be tricky.
 5 THE WITNESS: I communicated. I shared
 6 with him meetings I would have or -- and worked with
 7 him and the Iranian/American community to reach out
 8 to the Iranian/American community in his -- all
 9 right.
 10 I worked with him in his responsibility to
 11 reach out to the Iranian/American community and
 12 helped him with his work as it pertained to my work.
 13 That's my interaction. That's my summary of my
 14 interaction with Babak.
 15 BY MR. KAPSHANDY:
 16 Q. Did he have an office at NIAC or did you
 17 interact with him mostly by E-mail -- how did that
 18 work? -- or both?
 19 A. He worked at NIAC.
 20 Q. And if I told you NIAC has produced
 21 hundreds, if not thousands, of E-mails between he and
 22 you about these interactions, that wouldn't surprise

1 wasting a lot of time. You're showing her documents
 2 that her name is not on and you're asking her to
 3 characterize a document that she's never seen. Let's
 4 move.
 5 MR. KAPSHANDY: That's all right. Let me
 6 ask another question.
 7 BY MR. KAPSHANDY:
 8 Q. Okay. Did you and Mr. Talebi discuss at
 9 all his research and discussions and communications
 10 with the Alliance for Justice on lobbying rules or
 11 any of these attachments that he brought back or was
 12 sent to by the Alliance for Justice?
 13 MR. NELSON: Objection to the form of the
 14 question. There is no evidence that there was any
 15 research done by Babak Talebi.
 16 MR. WILSON: If you have a recollection --
 17 I think the question is, if you have a recollection
 18 of discussing what's in this exhibit with Mr. Talebi.
 19 I think that's your question. Right, Tim?
 20 MR. KAPSHANDY: Right. I'm not trying to
 21 be tricky. Let me break it down.
 22 BY MR. KAPSHANDY:

1 Q. Did he share these materials with you in
 2 Exhibit 32?
 3 A. I don't recall.
 4 Q. Did he discuss with you without
 5 necessarily sharing these materials that he had had
 6 some communications with the Alliance for Justice on
 7 the rules for lobbying?
 8 A. I have no memory of that.
 9 Q. Do you have any idea why it was if you're
 10 on the legislative side and he's on the community
 11 outreach side at NIAC he would have been the person
 12 looking into these lobbying issues?
 13 MR. NELSON: Objection. Calls for
 14 speculation.
 15 THE WITNESS: I don't recall any of the
 16 incidents you're talking about.
 17 BY MR. KAPSHANDY:
 18 Q. Okay. That's fair. Let's put it aside.
 19 MR. KAPSHANDY: Let me hand what you we
 20 will mark as your Deposition Exhibit 33.
 21 (Exhibit Number 33 was marked for
 22 identification and was attached to the deposition.)

1 BY MR. KAPSHANDY:
 2 Q. This is a document entitled, Legislative
 3 Strategy 12-month report, September 2007 to 2008.
 4 Take your time and look at it because I'm going to
 5 have some questions about it.
 6 MR. WILSON: I'm not seeing a date on
 7 this, Tim.
 8 MR. KAPSHANDY: I can help you out, if you
 9 want.
 10 MR. WILSON: Well, I see the second page
 11 says, Agenda for 2008. Do you have a question about
 12 it, Tim?
 13 BY MR. KAPSHANDY:
 14 Q. Have you seen this before?
 15 A. Yes.
 16 Q. Is it a document you prepared?
 17 A. Yes.
 18 Q. And if the electronic file reflected that
 19 it was prepared on or about June 8th, 2008, would
 20 that sound correct?
 21 A. It might be. I don't see any dates on
 22 this.

1 Q. I'm just telling you it was produced
 2 electronically by NIAC and the electronic date on the
 3 document says June 8, 2008. And if that were the
 4 case, does that sound like when it might have been
 5 prepared?
 6 MR. WILSON: In other words, do you have
 7 any reason to disagree with that as an approximate
 8 date from when it was prepared?
 9 THE WITNESS: I don't have any reason to
 10 disagree.
 11 BY MR. KAPSHANDY:
 12 Q. There's reference in there to a Colonel
 13 Sam Gardiner on like the fourth page right at the
 14 top.
 15 MR. WILSON: I'm not seeing Sam Gardiner,
 16 Tim.
 17 MR. KAPSHANDY: I'm sorry. I stuck the
 18 pages together.
 19 BY MR. KAPSHANDY:
 20 Q. It's the fourth page at the very top.
 21 MR. WILSON: My fourth page is --
 22 MR. KAPSHANDY: Let's go off the record

1 and make sure we're working with the same thing.
 2 (Discussion held off the record.)
 3 BY MR. KAPSHANDY:
 4 Q. Turning to page 3 of this document, in the
 5 first paragraph under strategy and recommendations,
 6 there's a --
 7 MR. NELSON: For the record, since we were
 8 off the record for a moment, is it your
 9 representation then that Exhibit 33 still has an
 10 electronic date of June 8th, 2008?
 11 MR. KAPSHANDY: Exactly.
 12 BY MR. KAPSHANDY:
 13 Q. If you turn to the first paragraph on page
 14 3, Strategy and Recommendations, the last two --
 15 three sentences read as follows: "This requires more
 16 time spent on Capitol Hill, meeting with staffers,
 17 attending conferences, and networking."
 18 NIAC's lobbying efforts are not even close
 19 to reaching the 20 percent ceiling for 501(c)(3)
 20 organizations. To have a real voice on the Hill,
 21 alongside every other minority community, NIAC must
 22 increase its lobbying effort."

1 First of all, did I read that correctly?
 2 A. You read what's on the page.
 3 Q. And those are words that you put into this
 4 memo that you wrote, correct?
 5 A. I don't recall putting those words into
 6 this memo.
 7 Q. Do you have any idea -- I didn't ask you
 8 if you recall it.
 9 Do you have any idea who might have put
 10 those words in this memo, other than you? It is
 11 authored by you?
 12 A. It is authored by me and it is a memo to
 13 the Board as requested by Dr. Parsi, and it's a
 14 result of a collaborative effort -- the final version
 15 is a collaborative effort between Dr. Parsi and
 16 myself. I don't recall having written those words.
 17 Q. Do you think those words may have come
 18 from Dr. Parsi?
 19 A. I can't speculate on that.
 20 Q. Do you have any idea where you would have
 21 gotten the notion that NIAC's efforts are not even
 22 close to reaching the 20 percent ceiling for

1 501(c)(3) organizations?
 2 A. Well, since I did not -- I don't recall
 3 writing it, I can't answer that.
 4 Q. Do you have any idea where you would have
 5 even gotten the notion that there is a 20 percent
 6 threshold for lobbying for 501(c)(3) organizations?
 7 MR. WILSON: Objection. This was gone
 8 over in her last deposition, and I'm really urging
 9 you to move this along, Tim. We've been going 45
 10 minutes, and I don't know what headway you've made,
 11 but, please, just move it along.
 12 BY MR. KAPSHANDY:
 13 Q. Can you answer the question?
 14 A. Sorry. Repeat the question.
 15 Q. Sure. Do you have any idea where in June
 16 of 2008 you would have gotten the notion that there
 17 is a 20 percent threshold for 501(c)(3) organizations
 18 on lobbying?
 19 MR. NELSON: Objection. There's been no
 20 testimony that that was her notion. It's stated in a
 21 document.
 22 MR. WILSON: If you can answer it, go

1 ahead.
 2 THE WITNESS: I can't answer.
 3 BY MR. KAPSHANDY:
 4 Q. You have no idea where you would have got
 5 (sic) that notion?
 6 A. I have general knowledge and I can't tell
 7 you if it was then or now, but the general knowledge
 8 -- my understanding was that the IRS law says that
 9 there's a specific threshold after which what one is
 10 doing would be considered lobbying. That's a general
 11 notion.
 12 I don't know when that information was
 13 made -- you know, came to my mind or where I got it,
 14 and now it's been more than two years.
 15 Q. Now, I would not cover anything from your
 16 prior deposition, but to give you some context, you
 17 will recall that there were a couple of exhibits that
 18 we covered before: Exhibits 8 and 10, 8 and 7, 8
 19 being a July 23rd, 2008 memo from Patrick Disney to
 20 you on lobbying disclosure and guidance attaching a
 21 doc file. Do you recall that?
 22 A. I recall your questions about it.

1 Q. Do you want to see the document again?
 2 I'm not going to ask you any questions about it. I
 3 just want to give you some context.
 4 MR. WILSON: Look, put it in front of her
 5 if you want to put it in front of her, but let's move
 6 this along.
 7 BY MR. KAPSHANDY:
 8 Q. I'll put it in front of you at the
 9 suggestion of your counsel and I'm not going to ask
 10 you any more questions other than I know that we
 11 discussed it at the prior deposition.
 12 Now, NIAC has recently produced calendar
 13 entries for Patrick Disney. Do you know who Patrick
 14 Disney was at that time in July of 2008?
 15 A. Patrick Disney at the time I was there was
 16 assistant legislative director.
 17 Q. And your title was?
 18 A. I had several titles. When I left, it was
 19 legislative director.
 20 Q. Are you aware that exactly a week before
 21 this July 23rd memo was sent to you his calendar
 22 reflects that he went to a seminar entitled,

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1 Worry-Free Advocacy for Nonprofits?
2 A. No.
3 Q. So you're not aware that your assistant a
4 week before this memo was written went to a seminar
5 called Worry-Free Advocacy for Nonprofits?
6 MR. NELSON: Objection. No foundation.
7 MR. WILSON: Objection. Asked and
8 answered. It's the same question.
9 THE WITNESS: No.
10 BY MR. KAPSHANDY:
11 Q. Do you have any idea how he might have
12 gotten an assignment to go do such a seminar on
13 Worry-Free Advocacy for Nonprofits at NIAC?
14 MR. WILSON: Calls for speculation.
15 THE WITNESS: Since I don't remember it
16 and I didn't know about it, I don't feel comfortable
17 speculating about it.
18 MR. KAPSHANDY: That's fair. Let me hand
19 you what we'll mark as your Deposition Exhibit 34, a
20 document from the Alliance for Justice called,
21 Worry-Free Lobbying for Nonprofits for the Alliance
22 for Justice.

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1 (Exhibit Number 34 was marked for
2 identification and was attached to the deposition.)
3 BY MR. KAPSHANDY:
4 Q. You don't have to look at the whole thing.
5 Just kind of flip through it.
6 Did Mr. Disney or anybody else at NIAC
7 share with you this document entitled, Worry-Free
8 Lobbying for Nonprofits?
9 A. I don't recognize this.
10 Q. Since your deposition last December, NIAC
11 has produced to us an amended tax return for 2008,
12 and their accountants have testified that they
13 amended the return to reflect that 10 percent of your
14 time in 2008 was spent on lobbying.
15 First of all, you look a little bit
16 surprised, and my question is: Do you have any idea
17 -- did you provide anyone any information, any time
18 records, with regard to 2008 as to how much of your
19 time was spent on lobbying?
20 A. I did not consider what I was doing
21 lobbying.
22 MR. WILSON: The question is --

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1 BY MR. KAPSHANDY:
2 Q. That's not the question. The question is
3 just simply, did you give anyone at NIAC, to NIAC's
4 accountants, to anyone, information that you spent 10
5 percent of your time in 2008 on lobbying activities
6 under -- as defined by the IRS?
7 A. I didn't give anyone information.
8 Q. Same thing for 2009 when you were there
9 until the spring. Did you give anyone at NIAC, their
10 accountants, agents, anybody involved with preparing
11 their tax returns, information on the amount of time
12 that you spent on lobbying-related activities, under
13 the IRS definition, in 2009?
14 A. Not that I recall.
15 Q. If you could take your calendar out in
16 front of you -- and I promise I don't want to go
17 through all of these and I'll try and do some of them
18 as general categories -- there are a number of groups
19 in here I want to ask you about that appear multiple
20 times.
21 And if you want, I'll refer you to the
22 entries, but right now I'm just asking about some of

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1 the names.
2 One is called the Iran/Iraq coordinating
3 committee, and there are meetings sometimes at the
4 Rayburn Building and sometimes at the Longworth
5 Building.
6 What is that group and what did it
7 involve?
8 A. To my recollection, it was a group of
9 organizations interested in foreign policy issues
10 pertaining to Iran and Iraq that met regularly on
11 Capitol Hill to share information and discuss policy
12 ideas and concerns, and it was mostly concerned with
13 Iraq, the war in Iraq.
14 And later the Iran issue got tacked on
15 when it looked as though there was an imminent threat
16 of war.
17 Q. I'm sorry. Could you speak up a little
18 bit? What was tacked on?
19 A. Iran, the issue of Iran.
20 Q. Where did these people come from?
21 A. Different organizations.
22 Q. And who invited them? Was it (sic)

1 invited by members of Congress?
 2 A. It was coordinated by a nonprofit, I
 3 believe, or -- excuse me. It was coordinated by a
 4 group.
 5 Q. What was that group's name?
 6 A. I don't recall.
 7 Q. Was it CNAPI or another group?
 8 A. CNAPI?
 9 Q. Campaign for New American Policy in Iran.
 10 A. No.
 11 Q. That was a different group?
 12 A. Yes.
 13 Q. You know what CNAPI was?
 14 A. Yes.
 15 Q. And you're aware that 80 percent of Mr.
 16 Disney's salary was paid for by a grant from OSI to
 17 run CNAPI?
 18 A. I wasn't aware of that percentage, no.
 19 Q. Were you aware that he was running CNAPI?
 20 MR. NELSON: Objection. Foundation.
 21 THE WITNESS: He was tasked with
 22 overseeing the organization --

1 these CNAPI meetings?
 2 A. Very, very limited. Once Patrick came to
 3 start organizing, he served as the primary and only
 4 representative from NIAC at those meetings.
 5 Q. Do you know who Michael is? Is that
 6 Michael Amitay? Because one of them says Michael's
 7 office, CNAPI.
 8 A. There are several Michael's.
 9 Q. Do you know who Mike Amitay is?
 10 A. Yes.
 11 Q. And who is he?
 12 A. He's an employee at Open Society
 13 Institute.
 14 Q. How many times have you met with him?
 15 A. I don't recall.
 16 Q. Is it always reflected in your calendar
 17 when you meet with OSI -- or Michael Amitay at OSI?
 18 A. No. I wouldn't say anything -- again, as
 19 I said before, this calendar is a very rough outline
 20 of my activities, because many times the meetings
 21 would be cancelled and I would never update them.
 22 I would never -- I was not in the practice

1 BY MR. KAPSHANDY:
 2 Q. That's fair.
 3 A. -- of CNAPI.
 4 Q. And there are a number of CNAPI meetings
 5 in your calendar, too. For example, there's one on
 6 March 20, 2008: "This is a reminder that our next
 7 meeting for the Campaign for New American Policy on
 8 Iran will take place" -- in this case, it was at the
 9 Open Society Institute at noon.
 10 A. Where are you looking?
 11 Q. Well, this one is on March 20, 2008.
 12 MR. WILSON: Do you have a specific
 13 question about that?
 14 MR. KAPSHANDY: Not really. I was just
 15 giving it as an example of the same organization
 16 we're talking about.
 17 BY MR. KAPSHANDY:
 18 Q. What was your involvement with CNAPI or
 19 was that handled mostly by Mr. Disney when he came
 20 in? Because there are some entries on your calendar.
 21 I won't go through all of them, but just
 22 from your recollection, what was your involvement at

1 of Xing out or deleting or noting -- putting a note
 2 on my calendar if something was cancelled, and many
 3 times, the appointments on my calendar was just an
 4 FYI to myself and usually -- and I did not attend.
 5 Q. Let me ask it this way: Are there
 6 meetings that sometimes didn't get in your calendar?
 7 A. There may have been.
 8 Q. And back to the point about editing your
 9 calendar, you weren't in the habit -- and I guess
 10 most people aren't -- of going back and deleting
 11 entries of meetings or calls that didn't happen is
 12 what you're saying, correct?
 13 A. Correct.
 14 Q. And in this case, another version of your
 15 calendars were produced on December 28th, 2009, which
 16 reflected that they had been edited and changed on
 17 December 25, 26, and 27 of 2009. Let's take that as
 18 true.
 19 My question for you is, did you have
 20 anything whatsoever to do -- keeping in mind that
 21 it's Christmas and Christmas weekend --
 22 MR. WILSON: And she was no longer at

1 NIAC.
 2 BY MR. KAPSHANDY:
 3 Q. Right, and you weren't at NIAC anymore as
 4 your counsel has --
 5 MR. NELSON: Counsel, this is
 6 grandstanding and --
 7 THE REPORTER: Please, one at a time.
 8 BY MR. KAPSHANDY:
 9 Q. Did you have anything to do with the
 10 editing of the calendar on those three days?
 11 MR. NELSON: Counsel, this has already
 12 been stipulated to. This is a waste of time.
 13 MR. WILSON: Go ahead, if you can answer.
 14 THE WITNESS: I don't know what you're
 15 talking about.
 16 BY MR. KAPSHANDY:
 17 Q. So you didn't make any edits to your
 18 calendar on December 25, 26, 27 in 2009?
 19 A. I don't recall.
 20 Q. Well, wouldn't you recall if you went into
 21 the office on Christmas Day and Christmas weekend and
 22 edited your calendars?

1 could actually change entries -- not nefariously, but
 2 you could add entries to your calendar from your
 3 Blackberry?
 4 MR. NELSON: Objection.
 5 THE WITNESS: Correct.
 6 BY MR. KAPSHANDY:
 7 Q. And same thing with your E-mails?
 8 A. Add E-mails?
 9 Q. You could send an E-mail from your
 10 Blackberry. And then if you went into your office a
 11 few days later, that E-mail would be on your
 12 computer, correct?
 13 A. Correct.
 14 Q. So your computer is not a stand-alone unit
 15 totally detached from other computers such as your
 16 Blackberry? I'm not asking you a technical question.
 17 MR. WILSON: You meant that in the past
 18 tense? You mean while she was employed at NIAC?
 19 MR. KAPSHANDY: Yes.
 20 THE WITNESS: I believe that's correct.
 21 BY MR. KAPSHANDY:
 22 Q. Let's go back to the calendar. There's a

1 THE WITNESS: Do I have to answer that?
 2 MR. WILSON: Yes, if you can.
 3 THE WITNESS: As I said, I don't recall.
 4 BY MR. KAPSHANDY:
 5 Q. My question is, wouldn't you recall if you
 6 had gone into NIAC's offices where you no longer
 7 worked on Christmas Day and Christmas weekend and
 8 edited your calendars, which you've already told us
 9 was not a practice of yours to do?
 10 MR. WILSON: I think the only question is,
 11 is that something you think you would remember if, in
 12 fact, you had done it. Right, Tim?
 13 MR. KAPSHANDY: Right.
 14 BY MR. KAPSHANDY:
 15 Q. Let me help you out --
 16 A. But it's not a matter of going into the
 17 office when I was to change anything in my calendar
 18 or update it. You'd do it on your Blackberry, and I
 19 was known to work --
 20 Q. Well, tell me about that. Your
 21 Blackberries were connected via some sort of device
 22 over the internet or an enterprise server, so you

1 few other groups I wanted to ask you about.
 2 There's one called the Iran Coordinating
 3 Committee. Is that the same thing as the Iran/Iraq
 4 Coordinating Committee or is it different?
 5 A. I don't know what you're talking about.
 6 Q. Well -- and I don't want to go through all
 7 of them in your calendar. Trust me. In your
 8 calendar there's something called the Iran/Iraq
 9 Coordinating Committee and another one called Iran
 10 Coordinating (sic). Is there a difference is what
 11 I'm asking you?
 12 A. I don't know.
 13 MR. NELSON: Is there a date you could
 14 show her?
 15 MR. KAPSHANDY: I'm trying to speed this
 16 up, counsel.
 17 BY MR. KAPSHANDY:
 18 Q. Turn to January 1st, 2008 where it just
 19 says Iran coordinator, January 9th, 2008. Do you see
 20 the one, Iran Coordinating (sic)?
 21 A. Yes.
 22 Q. Is that the same or is that different from

1 Iran/Iraq Coordinating Committee?
 2 A. I don't know.
 3 Q. And there's not much more on it. It just
 4 says two to three. Now, also on the same day,
 5 there's one called Iran Legislative Strategy Working
 6 Group, and this one is from 9:30 to 11:00, and it
 7 tells you where it's going to be, at the Center for
 8 Arms Control, 322 4th Street, Northeast. Do you see
 9 that?
 10 A. Yes.
 11 Q. What is the Iran Legislative Strategy
 12 Working Group?
 13 A. That was the precursor to the group that
 14 Patrick helped coordinate --
 15 Q. And what --
 16 A. -- CNAPI.
 17 Q. CNAPI, okay. So that was its earlier
 18 name. There's also reference to something called No
 19 War Iran Working Group. Do you understand that to be
 20 a different group? If you want to look, it's October
 21 9th, 2007.
 22 A. Repeat your question.

1 A. Yes.
 2 MR. NELSON: She's already testified to
 3 that.
 4 BY MR. KAPSHANDY:
 5 Q. What was that group?
 6 A. The precursor of CNAPI.
 7 Q. Okay. So -- strike that.
 8 There's one on November 14, 2008 called
 9 FCNL Lobby Day on Iran, November 14, 2008.
 10 A. 2008?
 11 Q. Right. Do you know what that is?
 12 A. I don't remember it, but it looks to me
 13 like this was FCNL's lobby day.
 14 Q. Do you have any idea what FCNL is?
 15 A. The Friends Committee for National
 16 Legislation.
 17 Q. And what is that group about?
 18 A. It's a Quaker group that, among other
 19 things, seeks to promote peace in the Middle East.
 20 Q. And on December 17th, 2008, there's one
 21 called Campaign Meeting, if you want to turn to that.
 22 Do you see that?

1 Q. What group is that?
 2 A. I don't recall. I don't remember.
 3 Q. Well, it's on there on quite a few
 4 different days. It's the Center for Arms Control and
 5 Nonproliferation. Does that help you?
 6 A. It is? Where does it say that?
 7 Q. And also, there's one on October 16th,
 8 2007, the same address, and January 9th, 2008 --
 9 MR. WILSON: Wait. Wait. Wait. No War
 10 Iran Working Group says conference call. On the
 11 16th, there's Iran Legislative Strategy Group.
 12 MR. KAPSHANDY: Yes. I'm onto the Iran
 13 Legislative Strategy --
 14 THE WITNESS: So we're not talking about
 15 No War Iran?
 16 BY MR. KAPSHANDY:
 17 Q. Right. You didn't know what that was?
 18 A. I don't know what that is.
 19 Q. The Iran Legislative Strategy Working
 20 Group and there's several meetings at the Center for
 21 Arms Control and Nonproliferation. Do you recall
 22 that group?

1 A. Yes.
 2 Q. And it says: "Positions for social
 3 responsibility, address on 1875 Connecticut Avenue."
 4 Can you tell what that's about? Is that CNAPI or
 5 something else?
 6 A. I don't recall.
 7 Q. You have no idea what Campaign Meeting
 8 means?
 9 A. Correct.
 10 Q. Okay. On February 24, 2009 -- turn to
 11 that, please. Do you see that meeting with Joe
 12 Perillow on Strategy at Starbucks? Who is Joe
 13 Perillow?
 14 A. I believe she was a staff member of
 15 Physicians for Social Responsibility.
 16 Q. If you could, please, turn to August 6th,
 17 2007. Are you at August 6th, 2007? Do you see a
 18 meeting with Max Trujillo, Rep Velazquez on SBA? Do
 19 you see that? Who are those people?
 20 A. Max Trujillo is the legislative director
 21 for Representative Velazquez.
 22 Q. And what is SBA?

1 A. Small Business Administration.
 2 Q. And what's the interest of NIAC and SBA
 3 and in particular meeting with Representative
 4 Velazquez about it?
 5 A. Generally, the Iranian/American community
 6 has a lot of small business owners and much of my
 7 work pertained to educating the members and Congress
 8 about the fact that the Iranian/American community
 9 had small business owners.
 10 Q. Well, were there particular issues of
 11 interest, other than small business generally, is
 12 what I'm getting at?
 13 A. NIAC sought recognition as a minority
 14 under SBA.
 15 Q. Okay. And I don't want to go through all
 16 of them, again, please, but I see meetings with Mark
 17 Kirk on SBA on other dates, meeting with Wendy at
 18 Enzi's office, SBA Tennessee trip. Do you recall an
 19 SBA Tennessee trip? That was on September 5 -- or
 20 August 27th, 2007.
 21 A. It looks like there's a question mark
 22 there --

1 that you just mentioned, correct?
 2 A. Not -- correct. I met with members and
 3 staff regarding, among other things, the SBA issue.
 4 Usually, when I put an entry, it would have something
 5 -- it would indicate what I should remember to bring
 6 up, but generally it was just a wider more broad
 7 conversation regarding Iran policy and updates and
 8 stuff.
 9 Q. What I'm going to hand you now is the
 10 exhibit that I handed to you previously that I was
 11 confused on. We'll mark it as Exhibit 35, and that's
 12 the legislative Watch Program 12-month Report,
 13 September 2007 to 2008.
 14 (Exhibit Number 35 was marked for
 15 identification and was attached to the deposition.)
 16 BY MR. KAPSHANDY:
 17 Q. I believe you told us when I showed you
 18 this or maybe I didn't because I was looking at a
 19 different one -- is this a document that you've seen
 20 before?
 21 A. I don't recall.
 22 Q. Tell us what the Leg Watch or Legislative

1 Q. So it may not have happened?
 2 A. -- and I don't recall that at all.
 3 Q. And if you want to look at them
 4 individually -- but I'll just mention some of them
 5 like Roberto Valencia, Congressman Moran's office on
 6 SBA, November 21, 2007. Do you know Roberto
 7 Valencia?
 8 A. I know of him.
 9 Q. I mean, you work at Congressman Moran's
 10 office now, don't you?
 11 A. Correct.
 12 Q. Roberto Valencia, did he work there at one
 13 time?
 14 A. At one time.
 15 Q. He doesn't anymore?
 16 A. That's correct.
 17 Q. And the entry says to discuss SBA. And
 18 then on October 2, we see a meeting at Wolf's office:
 19 Bring book, mention SBA.
 20 I mean, we see quite a few references to
 21 SBA. I take it, as you just said, you met with a
 22 number of congressmen or staffers about the SBA issue

1 Watch Program was.
 2 A. Legislative Watch was a program that was
 3 run through a grant -- I can't remember by whom, but
 4 it was -- the objective was to inform the
 5 Iranian/American community and the general public
 6 about policy issues pertaining to U.S./Iran relations
 7 and the happenings on Capitol Hill by reporting.
 8 Q. And the last paragraph on the first page
 9 mentions some statistics on upwards of 1,000 hours of
 10 research, 250 informational meetings with members of
 11 Congress and their staff.
 12 My first question for you is: Being
 13 involved as you were on the Hill, did you have any
 14 involvement in the preparation of these statistics?
 15 A. I'm sorry?
 16 MR. WILSON: His question had to do with
 17 whether you were involved in preparing any of the
 18 statistics that are in this paragraph.
 19 Is that right, Tim?
 20 MR. KAPSHANDY: Yes.
 21 THE WITNESS: I don't recall.
 22 BY MR. KAPSHANDY:

1 Q. We'll try and get the electronic data from
 2 that. I see you're interested in who prepared that
 3 document. Maybe that will help you, but I'm done
 4 with that one. Put it aside for a moment. Just a
 5 few more I want to cover with you here.
 6 Now, you're currently working at
 7 Representative Moran's office?
 8 A. Correct.
 9 Q. Have you continued your schooling? When
 10 we met the last time, you were talking about that.
 11 Are you taking any formal classes anywhere?
 12 A. Yes.
 13 Q. Where is that?
 14 A. The National Defense University.
 15 Q. And what are you studying there?
 16 A. I'm studying international security
 17 affairs.
 18 Q. Does that lead to a degree or something?
 19 A. Yes.
 20 Q. In what?
 21 A. A master's, security studies.
 22 Q. I think when I asked you before you had a

1 document electronically shows you as the author on
 2 September 9th, 2008.
 3 And assuming that that's true and that the
 4 document is authentic, would that refresh your
 5 recollection as to who would have prepared that
 6 document and when?
 7 A. I don't recall the specific document.
 8 Q. My question was, does that refresh your
 9 recollection, even having been told that --
 10 A. No.
 11 MR. WILSON: Objection.
 12 BY MR. KAPSHANDY:
 13 Q. Any idea who else might have had access to
 14 your computer to prepare a document like that and
 15 signing in as you on your computer?
 16 A. That's beyond my personal knowledge.
 17 Q. Let me ask you this: Are you familiar at
 18 all during your tenure at NIAC of other people
 19 signing in on your computer as you? Did you ever
 20 give anyone your log-in and password to do that?
 21 A. Not that I recall. I don't think we had a
 22 log-in, though.

1 little trouble with it. Do you recall what high
 2 school you went to?
 3 A. Lexington High School.
 4 Q. Lexington High School in Massachusetts?
 5 Lexington, Massachusetts?
 6 A. Correct.
 7 Q. Okay. And to answer your question about
 8 the document we just marked, it shows that the author
 9 is Emily Blout and it was prepared on September 9th,
 10 2008. Does that refresh your recollection as to who
 11 might have prepared that and when?
 12 MR. NELSON: Objection. There's no
 13 foundation.
 14 THE WITNESS: No. I don't recall that.
 15 MR. KAPSHANDY: Counsel, are you saying
 16 that your document is not authentic?
 17 MR. NELSON: I'm simply saying that you've
 18 made that representation. You haven't shown her
 19 anything that --
 20 BY MR. KAPSHANDY:
 21 Q. I'm suggesting for the record that NIAC's
 22 electronic information they provided with this

1 Q. For your own computer, you didn't have a
 2 log-in and password?
 3 A. Forget it. For the Windows -- you mean
 4 when you turn on your computer?
 5 Q. Right.
 6 A. You put in your name. Right, we had that.
 7 Q. Just your name? Was there a user name or
 8 a user name and a password?
 9 A. I don't recall.
 10 MR. KAPSHANDY: Can we go off the record
 11 just a second?
 12 (Discussion held off the record.)
 13 BY MR. KAPSHANDY:
 14 Q. Ready to proceed, Emily?
 15 A. Sure.
 16 Q. I don't know if you've looked at them, but
 17 while we were off the record, I had marked and placed
 18 in front of you three exhibits, the last three, I
 19 promise, we'll mark as Exhibit 36, 37, and 38.
 20 (Exhibit Numbers 36 through 38 were marked
 21 for identification and were attached to the
 22 deposition.)

1 BY MR. KAPSHANDY:
 2 Q. Why don't you just take a quick look at
 3 them? And I'll put them in front of you in that
 4 order. Do you have them?
 5 Why don't you take a look at 36 first,
 6 which is a February 2, 2009 memo from John Limbert to
 7 Emily Blout at NIAC, re: U.S. Interests Section in
 8 Iran and then there's what we call an E-mail chain
 9 which started with an E-mail from you.
 10 And my question, first of all, is, are you
 11 the Emily Blout that's mentioned in this E-mail at
 12 NIAC?
 13 A. Yes.
 14 Q. And --
 15 MR. NELSON: Counsel, you said February
 16 2nd?
 17 MR. KAPSHANDY: February 9th, 2009. The
 18 first one in the chain begins February 4, 2009 from
 19 her to Limbert.
 20 MR. WILSON: I think we're looking at --
 21 the one that we have, the first E-mail is February 4,
 22 2009.

1 Q. And an interests section is a part of the
 2 State Department, correct? We're talking about the
 3 United States State Department establishing an
 4 interests section in Iran. That's what this is
 5 about?
 6 A. Right.
 7 Q. I just want the record to be clear. Some
 8 people may not know what an interests section is, so
 9 the attempt here is to get the State Department to
 10 establish an interests section in Iran, correct?
 11 A. The E-mail was discussing the viability,
 12 the advisability of establishing an interests
 13 section.
 14 Q. And if you turn to the next one, February
 15 17, 2009, E-mail from you to Bill Goold --
 16 MR. WILSON: Is this Exhibit 37?
 17 MR. KAPSHANDY: Exhibit 37.
 18 BY MR. KAPSHANDY:
 19 Q. -- do you see that?
 20 A. Yes.
 21 Q. And who is Bill Goold?
 22 A. He was the director of the Progressive

1 MR. NELSON: Right.
 2 MR. KAPSHANDY: Could I see that, please,
 3 and make sure we're on the same page? I'm reading
 4 them in order from top to bottom. If you read them
 5 in reverse order, you're correct. It's February 4
 6 from bottom to top.
 7 MR. WILSON: February 6th, right, not
 8 February 9th?
 9 MR. KAPSHANDY: Oh, sorry. Thank you.
 10 I'm dyslexic.
 11 BY MR. KAPSHANDY:
 12 Q. So we have a chain of E-mails from
 13 February 4th of 2009 to February 6th, 2009, correct?
 14 A. Correct.
 15 Q. And this is regarding what?
 16 A. The possibility of interests section in
 17 Iran.
 18 Q. What does that mean, an interests section
 19 in Iran?
 20 A. It would -- an interests section is an
 21 informal consulate that would provide Visas and very
 22 little else to travelers from the U.S.

1 Caucus.
 2 Q. Which congressional caucus?
 3 A. The Progressive Caucus.
 4 Q. And is this E-mail on the same subject or
 5 maybe something else? I don't want to put words in
 6 your mouth.
 7 A. It appears that that subject was addressed
 8 in here.
 9 Q. Amongst other things. Perhaps it's
 10 broader. I mean, it talks about the interests
 11 section, but it also talks about engagement more
 12 broadly. Is that fair?
 13 A. I'd have to read the whole thing to tell
 14 you.
 15 Q. Well, it speaks for itself. But in any
 16 event, you then followed up and you mentioned
 17 Ambassador's Limbert's --
 18 A. Concerns.
 19 Q. You mentioned Ambassador Limber further to
 20 the --
 21 A. I mentioned his concerns, absolutely.
 22 Q. And again, turn to Exhibit 38. I don't

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1 want to go through the thousands of E-mails that were
2 produced last week, but there are many that mention
3 your name, and I just want to use this as an example
4 and it's a long E-mail chain that ends on July 13th,
5 2008 from Baja Hariri to Bijan Dastmalchi copying you
6 and Trita Parsi.
7 Can we go off the record for a second?
8 (Discussion held off the record.)
9 BY MR. KAPSHANDY:
10 Q. Emily, we got last week a whole bunch of
11 documents in this vain from Babak Talebi's E-mail,
12 and I'm not sure why this one was included. It's an
13 E-mail chain that eventually works it's way to Emily
14 Blout and Trita Parsi, correct?
15 A. I see that my name is cc'd on it.
16 Q. Right. In fact, if you work your way back
17 through the chain a little, I see you're involved in
18 it, but who is Bijan Dastmalchi?
19 A. He was a member of the Board.
20 Q. And Baja Hariri?
21 A. A member of the Board.
22 Q. And generally, this discusses an effort to

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1 contact Nancy Pelosi about HR-362?
2 A. I would have to read through the whole
3 thing.
4 Q. It speaks for itself. We don't need to do
5 that. I'm just generally wanting to know is that
6 kind of how the coordination worked with Babak Talebi
7 on this outreach responsibility that he had that you
8 were talking about earlier?
9 MR. NELSON: Objection.
10 THE WITNESS: I don't see Babak's name on
11 this.
12 BY MR. KAPSHANDY:
13 Q. I don't either. I'm hoping maybe you
14 could shed some light. It was produced recently as
15 part of his E-mail.
16 Is this an example of the sort of outreach
17 that Babak Talebi was doing and you all were
18 coordinating within DC on your end on the legislative
19 side?
20 MR. NELSON: Objection to the form of the
21 question, the foundation, or lack thereof.
22 MR. WILSON: If you can answer the

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1 question, go ahead.
2 THE WITNESS: No.
3 BY MR. KAPSHANDY:
4 Q. Well, how is it that a couple of Board
5 members are copying you on E-mails about their
6 efforts to contact Nancy Pelosi on a specific piece
7 of legislation? I'm just trying to figure out how
8 that works.
9 A. I don't know. You'd have to ask them.
10 Q. Well, what did you do when you got these
11 E-mails? Did you read them?
12 A. I don't recall specifically. It appears
13 from this document that I responded once and most of
14 the time did not respond.
15 Q. Okay. My question is, generally, when you
16 got E-mails from members, Babak Talebi, others
17 outside of DC meeting with congressmen in their
18 districts, what did you do with them?
19 A. If I was cc'd on an E-mail?
20 Q. Right.
21 A. I would not be the one to respond.
22 Q. I understand that, but were you tracking

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1 them? Were you filing them? Did you just ignore
2 them?
3 A. It's a pretty general question. I
4 couldn't tell you.
5 Q. As the legislative director who was being
6 paid by NIAC for certain legislative
7 responsibilities, when you got information from Board
8 members or members or Babak Talebi out in the field
9 about meetings with congressmen on legislative
10 matters, you didn't do anything with them?
11 A. I don't think this represents meetings.
12 Q. I'm just speaking generally, and if it
13 confuses you --
14 A. I'm confused. Are we talking about the
15 document that we're looking at right now?
16 Q. As an example --
17 MR. WILSON: His question was more
18 general, which is when Board members copied you on
19 E-mails concerning efforts that they were making in
20 the legislative arena, what was your normal practice?
21 MR. NELSON: My objection is that there's
22 no foundation that that ever happened.

1 MR. WILSON: If you can answer what your
2 general practice was. You can say what your general
3 practice was.

4 THE WITNESS: If they copied me, I would
5 not respond.

6 BY MR. KAPSHANDY:

7 Q. Did you file them in your file on things
8 like HR-362?

9 A. I don't recall.

10 Q. The point is, were you being included for
11 consistency? for advice? for strategy?

12 MR. NELSON: Objection. Calls for
13 speculation.

14 THE WITNESS: I don't know. That's beyond
15 my personal knowledge.

16 MR. KAPSHANDY: Okay. That's all I have.
17 Thank you very much.

18 MR. NELSON: Can we go off the record for
19 a minute?

20 (Discussion held off the record.)

21 MR. KAPSHANDY: I guess we're concluded.
22 We've agreed to -- with all counsel to redact a

1 that they are directly relevant and discoverable and
2 ask that they be produced immediately before the next
3 set of depositions so we don't have to redo
4 depositions again.

5 MR. NELSON: And for the record, our
6 client was only advised of the existence of some
7 program called SF. It was not identified as sales
8 force.

9 And so any response that was given by our
10 client related to a vague reference to a program
11 entitled SF, if there was such a program as sales
12 force that we are now aware of, we will certainly
13 investigate whether or not that program exists.

14 MR. KAPSHANDY: For the record, I would
15 note that the request was also with regard to any
16 sort of software for tracking such meetings. It was
17 not limited to SF, and I would respectfully request
18 you not hide behind that narrow definition and
19 immediately produce that information.

20 MR. NELSON: And I would note for the
21 record that the witness did testify that if such
22 program was used, it was for a very limited time

1 couple of provisions of a personal nature from Ms.
2 Blout's calendar, and she'll -- and her counsel will
3 follow up on that.

4 For NIAC's counsel, I would, again,
5 request, as we've requested before, that you produce
6 the sales force SF data which your client denies
7 exists and also the agendas from each week, an
8 example of which was produced last week and Ms. Blout
9 has testified was used regularly, certainly not only
10 once.

11 So I'd request, again, that those be
12 produced as soon as possible.

13 MR. NELSON: And NIAC's position is that
14 if sales force data exists and it's responsive and
15 relevant in this case, it will be produced. The same
16 response with respect to any type of agendas.

17 MR. KAPSHANDY: And with regard to sales
18 force, I would note for the record that counsel has
19 been informed by his client that such did not exist.
20 I don't think there's any further need for you to be
21 checking to see if such is responsive.

22 With regard to the agendas, I would submit

1 period, and so it's entirely possible that NIAC did
2 not recall that this software was used for the
3 limited time period that was testified to by the
4 witness.

5 MR. KAPSHANDY: That's all I have. Thank
6 you very much.

7 THE REPORTER: Reading and signing?

8 MR. WILSON: Yes, please.

9 THE REPORTER: Would you like a copy, Mr.
10 Wilson?

11 MR. WILSON: I don't need a copy, but she
12 would like to read and sign.

13 THE REPORTER: Mr. Nelson, would you like
14 a copy?

15 MR. NELSON: Yes, please.

16 MR. KAPSHANDY: We want an electronic and
17 exhibits.

18 (Continued deposition concluded at 11:53
19 a.m.)

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