

Page 1562

1 UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF FLORIDA

2 CASE NO. 94-2681-CIV-DAVIS

3

4 JORGE MAS CANOSA,)
5 Plaintiff,)
6 v.)
7 THE NEW REPUBLIC, INC., and)
8 ANN LOUISE BARDACH,)
9 Defendants.)
-----x

10

11 2601 South Bayshore Drive
Miami, Florida
12 Thursday, June 6, 1996
9:12 a.m. - 6:00 p.m.

13

14 CONTINUATION OF THE VIDEOTAPE DEPOSITION OF
15 JORGE MAS CANOSA
P.M. SESSION

16

17

18 Taken before RICHARD BURSKY, Registered
19 Professional Reporter and Notary Public in and
20 for the State of Florida at Large, pursuant to
21 Notice of Taking Deposition filed in the above
22 cause.

23

24

25

Page 1564

1 1:15 p.m.

2 MR. OVELMEN: This is for you.

3 (Defendants' Exhibit 153 was marked for
4 identification.)

5 MR. CANTERO: Is this an exhibit?

6 MR. OVELMEN: It is marked as 153.

7 MR. CANTERO: Is this a copy here?

8 MR. OVELMEN: Yes.

9 MR. CANTERO: By the way, he can give
10 you more detail on the comparison.

11 MR. OVELMEN: After. Hopefully I will
12 have time before I quit.

13 All right, sir, here's another copy.

14 Are we ready, okay to go?

15 MR. CANTERO: Yes.

16 BY MR. OVELMEN:

17 Q. Mr. Mas, have you seen this SSI study
18 before?

19 A. Yes, I did.

20 Q. Are you familiar with Donald Schulz?

21 A. No, I am not.

22 Q. Can you turn to page little iv, Roman
23 numeral iv?

24 A. Okay.

25 Q. Could you read that.

Page 1563

1 APPEARANCES

2 ON BEHALF OF THE PLAINTIFF

3 ADORNO & ZEDER, P.A.

4 2601 South Bayshore Drive

5 Suite 1600

6 Miami, Florida 33133

7 BY: RAOUL G. CANTERO, III, ESQ.

8

9 ON BEHALF OF THE DEFENDANT THE NEW REPUBLIC, INC.

10 BAKER & MCKENZIE

11 701 Brickell Avenue

12 Suite 1699

13 Miami, Florida 33131

14 BY: RICHARD J. OVELMEN, ESQ. ARAGON

15

16 ON BEHALF OF THE DEFENDANT ANN LOUISE BARDACH

17 BURLINGTON WEIL & CROCKETT, P.A.

18 2699 South Bayshore Drive

19 Penthouse

20 Miami, Florida 33133

21 BY: PAUL J. SCHWIEP, ESQ.

22

23 PRESENT

24 ANN LOUISE BARDACH

25 AFTERNOON SESSION

Page 1565

1 (Pause.)

2 A. Yes.

3 Q. Are you familiar with, does that
4 refresh your recollection as to who Donald Schulz
5 is, Schulz is?

6 A. It doesn't refresh anything because I
7 have not known him before, I have not read
8 anything by him before.

9 Q. All right. Is it your understanding
10 that he is a, is your understanding of the
11 biographical sketch paragraph that he is a
12 research professor at the Strategic Studies
13 Institute of the US Army War College?

14 MR. CANTERO: Objection. He said he
15 doesn't know who he is.

16 MR. OVELMEN: I am asking for his
17 understanding of this paragraph.

18 MR. CANTERO: Whatever the paragraph
19 says.

20 MR. OVELMEN: I am asking for his
21 understanding of it.

22 THE WITNESS: What the paragraph said
23 it said. I don't understand anything about
24 it.

25 BY MR. OVELMEN:

1 Q. Do you understand the first sentence?
 2 A. Yes, I read the first sentence, yes.
 3 Q. What is your understanding of it?
 4 A. What he said there which I don't know
 5 if that is true or not.
 6 Q. I just want to know what your
 7 understanding of it is, sir.
 8 A. The same thing that it explained it.
 9 Q. Could you tell me what your
 10 understanding of that is?
 11 MR. CANTERO: You want him just to read
 12 it?
 13 MR. OVELMEN: If his understanding is
 14 literal, just read it.
 15 MR. CANTERO: I don't understand by
 16 what you mean, what his understanding --
 17 MR. OVELMEN: I want to know if he
 18 understands what that means.
 19 THE WITNESS: I understand what it
 20 means, but that is a different question from
 21 what is my understanding.
 22 BY MR. OVELMEN:
 23 Q. Just tell me what your understanding
 24 is.
 25 A. What does it mean, my understanding

1 Q. Well, we can stop this deposition if
 2 you want.
 3 A. Sure, we can stop it because --
 4 MR. CANTERO: Please.
 5 MR. OVELMEN: I am asking him a simple
 6 question which is what is his understanding
 7 of that sentence.
 8 MR. CANTERO: You are trying to show
 9 the truth of the matter by handing him --
 10 MR. OVELMEN: No, I am not.
 11 MR. CANTERO: If it shows that he is a
 12 research professor of national security
 13 policy, that's what it says.
 14 MR. OVELMEN: At the Strategic Studies
 15 Institute.
 16 MR. CANTERO: You don't need him to
 17 tell you that's what it says.
 18 MR. OVELMEN: I am asking if that is
 19 his understanding, is that what this
 20 sentence says.
 21 THE WITNESS: I am not going to answer
 22 that question, I already told you.
 23 BY MR. OVELMEN:
 24 Q. Read --
 25 MR. CANTERO: Just read it and ask him

1 of?
 2 Q. It is a standard question in a
 3 deposition to ask someone's understanding of what
 4 a sentence is. Just tell me what you
 5 understand.
 6 A. Whatever the sentence said.
 7 Q. Right, but you have to tell me.
 8 A. I wouldn't vouch for that sentence.
 9 Whatever the sentence is, yes, I read it.
 10 Q. You don't have to vouch for it, sir, I
 11 am not asking you whether it is true or not.
 12 A. Then what is the understanding, what
 13 do you mean what is my understanding?
 14 Q. I just want to know what your
 15 understanding of what it means, what does it mean
 16 to you?
 17 A. What do you mean by my understanding?
 18 Q. All right, where is he a professor?
 19 A. What?
 20 Q. Where is he a professor?
 21 A. I don't know.
 22 Q. What is your understanding of what
 23 that sentence says?
 24 A. Whatever it says, but you have to
 25 explain me what my understanding is.

1 if that is his understanding of what it
 2 says.
 3 BY MR. OVELMEN:
 4 Q. Is it your understanding of that
 5 sentence that Donald Schulz is a research
 6 professor at the Strategic Studies Institute of
 7 the US Army War College?
 8 A. When?
 9 Q. I am just asking if that is what that
 10 sentence means.
 11 A. An associate research, and I am asking
 12 when, because I don't know when this was written.
 13 Q. Well --
 14 A. In 1993. Now we are in 1996 so you
 15 have to qualify your question.
 16 Q. I am not asking you whether he is in
 17 fact a member now, ever or any other time. I am
 18 asking you if that sentence means, if that is
 19 what the meaning of that sentence is, not whether
 20 the sentence is true or not.
 21 A. Well, for whoever wrote it, yes, that
 22 probably is what it meant.
 23 MR. CANTERO: We will stipulate the
 24 sentence says what the sentence says.
 25 THE WITNESS: Yes, sir. Whatever the

Page 1570

1 sentence said, it said, period.
 2 MR. OVELMEN: All right.
 3 BY MR. OVELMEN:
 4 Q. Let me direct your attention to the
 5 foreward on the prior page. You see the last
 6 paragraph before the signature?
 7 MR. CANTERO: I am sorry, the
 8 foreward?
 9 MR. OVELMEN: Yes.
 10 MR. CANTERO: Okay.
 11 THE WITNESS: Yes.
 12 BY MR. OVELMEN:
 13 Q. The sentence that reads, "The
 14 Strategic Studies Institute is pleased to publish
 15 this report as a contribution to understanding
 16 events in this important region."
 17 Do you understand then this to be a
 18 publication of the Strategic Studies Institute?
 19 A. No.
 20 Q. All right.
 21 A. It is not.
 22 Q. It is not a publication of the
 23 Strategic Studies Institute?
 24 A. It does not reflect the opinion of the
 25 Strategic Studies Institute, so the way --

Page 1571

1 Q. How do you --
 2 A. Wait, let me answer.
 3 Q. Okay.
 4 A. The way you have construed your
 5 question is for me to imply in my answer that the
 6 Strategic Studies Institute vouches support what
 7 they publish here. And they don't. So --
 8 Q. I didn't ask you that question. ?
 9 A. That's what I understood.
 10 Q. No, I asked you --
 11 A. Or that was the implication.
 12 Q. I asked you whether the Strategic
 13 Studies Institute published this report as a
 14 contribution to understanding events in this
 15 important region.
 16 A. I don't know what the region was to
 17 publish this, but whatever it said there it said.
 18 Q. Do you think that Strategic Studies
 19 Institute does not vouch for this report?
 20 A. Right.
 21 Q. What do you base that on?
 22 A. In the previous page if you read
 23 there, can you read that aloud.
 24 Q. "The views expressed in this report
 25 are those of the author and do not necessarily

Page 1572

1 reflect the official policy or position of the
 2 Department of the Army, the Department of Defense
 3 or the US government."
 4 Is there a reference to Strategic
 5 Studies Institute I have missed?
 6 A. Yes.
 7 Q. Where is it?
 8 A. On the Strategic Studies Institute is
 9 headed by this colonel, apparently and this is
 10 not the position of the Department of the Army,
 11 the Department of Defense or the US government.
 12 Q. Right. But I think the question was
 13 whether it was published by the Strategic Studies
 14 Institute as a contribution to understanding
 15 events in this region, this important region, I
 16 think that was the question, not whether the US
 17 Army or the Department of the Army, the
 18 Department of Defense or the US government --
 19 A. Yes, excuse me just a minute.
 20 (The witness and his counsel confer off
 21 the record.)
 22 A. Go ahead, sir.
 23 Q. All right, sir.
 24 Looking at V, Roman numeral V, the
 25 summary?

Page 1573

1 A. Yes.
 2 Q. The summary. The summary initial
 3 paragraph reads, "This study examines the
 4 prospects for Fidel Castro's political
 5 survival" --
 6 A. Where is that?
 7 Q. Roman numeral v, Summary, first
 8 paragraph, Roman numeral v, Summary, first
 9 paragraph.
 10 A. Okay.
 11 Q. "This study examines the prospects for
 12 Fidel Castro's political survival and for Cuba's
 13 political stability. It looks at these forces,
 14 both domestic and foreign, that tend to
 15 strengthen the regime and impede change, as well
 16 as those that might produce a violent political
 17 explosion.
 18 "Specific proposals are made for US
 19 policy, with a view to defusing the potentially
 20 dangerous situation that has developed and
 21 facilitating a peaceful transition to democracy
 22 and economic reform. Among the major conclusions
 23 and recommendations are the following."
 24 Now, have you reviewed the report in
 25 the past?

1 A. No, I haven't.
 2 Q. So you don't know what the following
 3 recommendations and conclusions are?
 4 A. No, I don't.
 5 Q. Do you consider or do you have an
 6 opinion as to the Strategic Studies Institute?
 7 A. No, I don't.
 8 Q. You don't have an opinion?
 9 A. No.
 10 Q. So you would have no basis then to
 11 consider it a communist front entity?
 12 A. No, I don't.
 13 Q. And as far as John Mountcastle,
 14 colonel in the US Army, director of the Strategic
 15 Studies Institute, you have no basis to question
 16 his credibility?
 17 A. I don't know the gentleman.
 18 Q. Turning to page ix, Roman numeral ix.
 19 A. Okay, go ahead. What is the page
 20 number, ix?
 21 Q. Yes.
 22 (The witness and his counsel confer
 23 off the record.)
 24 MR. OVELMEN: For the record, for the
 25 record, you know, I would like to minimize

1 MR. CANTERO: If it wasn't in effect
 2 for you guys, I don't see why it should be
 3 in effect for us.
 4 MR. OVELMEN: Because it is after the
 5 effective date.
 6 Unless you know something different
 7 about how the rules work, I am not trying to
 8 cause trouble, I just point out the rule is
 9 in effect now and we should conform to it.
 10 BY MR. OVELMEN:
 11 Q. Anyway, page ix, Roman numeral ix,
 12 sorry, Specific Recommendations, do you see
 13 number two, the second bullet, I guess you call
 14 those, which reads, "Distance itself from the
 15 Cuban American National Foundation, while
 16 continuing to maintain amicable ties with that
 17 organization," do you see that recommendation?
 18 A. Yes.
 19 Q. Do you have any reason to believe that
 20 the SSI was acting under the influence of the
 21 Castro regime in making that recommendation?
 22 A. I don't have any, but I have a view
 23 about that.
 24 Q. Okay.
 25 A. And the view is very clear. I don't

1 consultations with counsel during
 2 deposition.
 3 MR. CANTERO: I am not --
 4 THE WITNESS: I am entitled to it.
 5 MR. OVELMEN: No.
 6 THE WITNESS: Oh, sure.
 7 MR. OVELMEN: Will you instruct him?
 8 MR. CANTERO: I am not instructing him
 9 how to answer or anything like that. When
 10 there is no pending question, sometimes he
 11 wants to consult with me, you have no
 12 objection to that, when there is no pending
 13 question.
 14 MR. SCHWIEP: There is a new local
 15 rule.
 16 MR. OVELMEN: There is a local rule
 17 which prohibits that. I think we should go
 18 by the local rule which does not allow that.
 19 MR. CANTERO: I don't think we went by
 20 that local rule when it was Ann Bardach's
 21 deposition or when it was Andrew Sullivan's
 22 deposition or when it was Martin Perez'
 23 deposition.
 24 MR. SCHWIEP: It wasn't in effect up
 25 until April 15.

1 think that the, this report reflects the opinion
 2 of any institution which is the author and I go
 3 back to this paragraph that says the views
 4 expressed in this report are those of the author.
 5 So you are implying that the SSI
 6 supports this piece which I don't think that is
 7 the case.
 8 Also, I think that this gentleman
 9 here, whoever wrote this piece here, the first
 10 person that he thanks is Dr. Richard Planas who
 11 is an open critic of my role in Radio Marti and
 12 my role in public life, so you can see that this
 13 document has been biased by the opinion of
 14 someone who has declared publicly that he is my
 15 political enemy.
 16 So yes, I do have an opinion and I
 17 think that this is, it reflects the opinion of
 18 the author and the opinion of this gentleman,
 19 Richard Planas.
 20 Q. But you do recognize that the study
 21 says, that the report itself says that, "The
 22 Strategic Studies Institute is pleased to publish
 23 this report as a contribution to understanding
 24 events in this important region?"
 25 A. Sure, but it doesn't imply and it

Page 1578

Page 1580

1 doesn't mean that they share the views of the
 2 author.
 3 Q. Right.
 4 A. Anyone who publishes a work for
 5 somebody else is pleased to do it, otherwise they
 6 won't do it.
 7 Q. And you recognize that the author is
 8 himself a member of the Strategic Studies
 9 Institute, correct?
 10 A. I don't know that, sir.
 11 Q. You understand that the, at least the
 12 report says that?
 13 A. Where does it say that?
 14 Q. In the paragraph we began with the
 15 biographical sketch of the author.
 16 A. Okay, I don't know that.
 17 Q. It says he's an associate research
 18 professor of national security policy --
 19 A. Okay, then.
 20 Q. -- at the Strategic Studies
 21 Institute.
 22 A. You make that representation, I accept
 23 it.
 24 Q. All right, sir.
 25 The next paragraph says that the

1 with that because that is the case with Radio
 2 Marti, is depoliticized.
 3 Q. The recommendation is that it needs to
 4 be depoliticized, that's the recommendation, that
 5 is what I am asking, whether you agree with --
 6 A. Sure, I agree Radio Marti is
 7 depoliticized, it is not politicized, any
 8 statement along that line which is my belief is I
 9 support.
 10 Q. Looking at page 22 of the document, I
 11 will give you just a minute just to read the page
 12 beginning at page 22, beginning with the
 13 second -- the first new paragraph, "Let us be
 14 clear."
 15 A. Yes.
 16 Q. Through to the middle of the next
 17 page.
 18 (Pause.)
 19 A. I read it.
 20 Q. All right, sir?
 21 A. Yes.
 22 Q. Looking at the, three sentences down
 23 in that excerpt, it says, "But the dominant
 24 elements in the Cuban American elite have their
 25 roots in the pre-Castro era; they long ago lost

Page 1579

Page 1581

1 Clinton administration also should, "Depoliticize
 2 Radio Marti and use its broadcasts to reassure
 3 Cubans that they have nothing to fear from the
 4 United States. Specifically they must be
 5 reassured that their lives and properties will be
 6 secure in the post-Castro era."
 7 Do you agree with that?
 8 A. Yes, I do. Because Radio Marti is
 9 depoliticized and I think that everybody should
 10 be reassured that their life and property would
 11 be secure in the post-Castro era.
 12 Q. But isn't their recommendation that it
 13 needs to be depoliticized?
 14 A. That's the recommendation.
 15 Q. And I ask you --
 16 MR. CANTERO: I object to the term,
 17 their recommendation. This is the
 18 recommendation of one author.
 19 MR. OVELMEN: Of the report, right.
 20 THE WITNESS: That is a different
 21 question, if I agree or disagree with that.
 22 That is a different question.
 23 BY MR. OVELMEN:
 24 Q. That was the question I was asking.
 25 A. The question is that, yes, I do agree

1 touch with the hopes and fears of Cuban Cubans.
 2 Moreover, their primary leader, Jorge Mas Canosa,
 3 is a man of enormous ambition, who has made no
 4 secret of his desire to become the next Cuban
 5 president.
 6 "In many respects, Mas is a
 7 capitalist mirror image of Fidel Castro:
 8 demagogic, intolerant, dictatorial, with an
 9 enormous ego and a propensity for delivering
 10 thundering speeches exuding hatred and
 11 intransigence. He has often played to the worst
 12 instincts of Cuban Americans, encouraging,
 13 intentionally or unintentionally, violence-prone
 14 elements to attack or harass not only Castro's
 15 Cuba but anyone, the Miami Herald comes quickly
 16 to mind, who expresses views on the subject that
 17 are different from his own. This is not a
 18 democratic alternative to Fidel Castro, and those
 19 islanders familiar with Mas are not anxious to
 20 trade in their leftist dictator for one from the
 21 opposite extreme."
 22 First of all do you agree with that
 23 paragraph?
 24 A. No, I disagree.
 25 Q. Can you tell me what the basis of your

1 disagreement is?
 2 A. The whole contents of the paragraph.
 3 Q. Breaking it down, is it accurate to
 4 say that you have made no secret of your desire
 5 to become the next Cuban president?
 6 A. It is not accurate.
 7 Q. Do you recall the 60 Minutes program
 8 in which you were interviewed?
 9 A. Yes.
 10 Q. Do you recall addressing that point in
 11 the 60 Minutes program?
 12 A. Yes.
 13 Q. Do you recall what you said?
 14 A. Yes. I never said that I was running
 15 for president in Cuba.
 16 Q. Didn't you say you wanted to be
 17 president of Cuba?
 18 A. No, sir, never.
 19 Q. You didn't?
 20 A. No.
 21 Q. All right, sir.
 22 THE VIDEOGRAPHER: Come on in.
 23 THE WITNESS: Go ahead.
 24 BY MR. OVELMEN:
 25 Q. Do you see yourself as a capitalist

1 reflection on what Mr. Planas has been saying in
 2 public before.
 3 Q. Is Mr. Planas a powerful person?
 4 A. He is --
 5 MR. CANTERO: I object to the form.
 6 A. He worked for the research department
 7 of Radio Marti. I cannot qualify whether he is
 8 influential or not.
 9 Q. Is he wealthy?
 10 A. I don't know, sir, I don't know him.
 11 If you put Planas right in front of me I wouldn't
 12 know him.
 13 Q. You wouldn't know him if you saw him?
 14 A. No.
 15 Q. So you don't know that he's a powerful
 16 or influential person?
 17 A. No, I don't. What I know is what is
 18 written here, expression of gratitude to
 19 Mr. Planas, who has been very, very critic
 20 publicly of my positions on thinking.
 21 Q. And you think the expression of
 22 gratitude shows that Mr. Planas wielded influence
 23 over the professor here?
 24 A. As specifically for this piece, yes,
 25 it is expressed here. I am not saying that the

1 mirror image of Fidel Castro?
 2 A. No, I don't.
 3 Q. Do you agree that you are not a
 4 democratic alternative to Fidel Castro?
 5 A. What is the question?
 6 Q. Do you agree that you are not a
 7 democratic alternative to Fidel Castro?
 8 A. I disagree.
 9 Q. Is there any reason that you can think
 10 of why this particular professor would draw these
 11 conclusions?
 12 A. Probably the influence of Mr. Planas
 13 as I mentioned before.
 14 Q. Do you think that he was under the
 15 influence of Mr. Planas?
 16 A. Yes, I think so, probably, yes.
 17 Q. Is Mr. Planas a very influential
 18 person?
 19 A. I don't know, but he's my political
 20 critic and enemy and he has declared himself my
 21 enemy and the first thanks in this piece here is
 22 expressed to him.
 23 So I just discovered he is here while
 24 I was reading this book here. So this is what he
 25 has written in this paragraph, here, is the

1 author here is saying thank you for his
 2 assistance, the author wishes to thank
 3 Dr. Richard Planas for their incisive comments on
 4 earlier drafts of this work.
 5 It is said here. I am not saying
 6 that, this is the author, the one who is saying
 7 that.
 8 Q. Because you don't know what the
 9 comments were, right, is that correct?
 10 A. The comments are referring to this
 11 piece here, that's what he is implying here. I
 12 am not saying that, he is the one who is saying
 13 that.
 14 Q. You don't know if the comments were
 15 favorable or unfavorable, is that correct?
 16 A. It is not going to be favorable
 17 because I never heard Mr. Planas stating a
 18 favorable comment on my behalf.
 19 Q. No, you misunderstood the question.
 20 The question is, do you know whether Planas'
 21 comments on this manuscript were favorable or
 22 unfavorable.
 23 A. That's my answer, it is not going to
 24 be unfavorable because, about my person it is not
 25 going to favorable.

1 Q. Do you know whether --
 2 A. It is not going to be favorable to my
 3 person because he hasn't said anything favorable
 4 to my, about my person for a long time.
 5 Q. Are you aware of what comments
 6 Mr. Planas made?
 7 MR. CANTERO: Are we getting a little
 8 far afield, you know, to the contents of
 9 this article, which is already far afield in
 10 itself? You asked him if he agrees with the
 11 article. He doesn't agree with this
 12 statement.
 13 MR. OVELMEN: Right.
 14 MR. CANTERO: And you asked a few
 15 questions about Planas, that's fine, but --
 16 MR. OVELMEN: Are you done?
 17 MR. CANTERO: Yes.
 18 MR. OVELMEN: Thanks.
 19 BY MR. OVELMEN:
 20 Q. So do you know what comments
 21 Mr. Planas made, do you know whether, do you know
 22 whether he made any comments about you?
 23 A. When and to whom?
 24 Q. To the professor here.
 25 A. When he made those statements and what

1 disagree with?
 2 A. Everything.
 3 Q. Do you disagree with the sentence,
 4 "For their part, the exiles were useful allies
 5 in promoting some of the Reagan administration's
 6 pet projects"?
 7 A. Yes, I disagree with that.
 8 Q. You don't think the exiles were useful
 9 allies of the Reagan administration in anything
 10 or specifically in the efforts to organize and
 11 wage the Contra war or to help --
 12 A. I already answered that question.
 13 Q. So you don't think --
 14 A. I already answered, I said disagree
 15 with all those statements here.
 16 Q. Did President Bush's son Jeb become an
 17 informal liaison between the White House and the
 18 Miami Cuban leadership?
 19 A. No, he didn't.
 20 Q. Have you ever had communications with
 21 Jeb Bush about --
 22 A. Yes.
 23 Q. -- the Reagan administration during
 24 the course of, or the Bush administration?
 25 A. Yes, I did, but that's different from

1 kind of statements, no, I don't. All what I know
 2 is what this author is saying here, is written,
 3 is right here, "The author wishes to thank
 4 Dr. Richard Planas for his incisive comments on
 5 earlier drafts of this work."
 6 So he is saying that Planas worked on
 7 this document here, and what I am telling you,
 8 that this paragraph fits exactly the description
 9 that Planas has made publicly about me.
 10 Q. I understand that's what you are
 11 saying. What I am saying is, though, do you know
 12 whether he made even any comment about any part
 13 of the draft relating to you?
 14 MR. CANTERO: Objection, asked and
 15 answered. He said, all I know is what is in
 16 here.
 17 THE WITNESS: All I know is again what
 18 is in here and I am not going to answer that
 19 question.
 20 BY MR. OVELMEN:
 21 Q. All right, sir. Looking at the next
 22 paragraph, beginning "unfortunately," do you
 23 agree with the content of that paragraph?
 24 A. No, I don't.
 25 Q. All right, sir. What is it that you

1 becoming a liaison.
 2 Q. I believe the phrase is informal
 3 liaison. What is your understanding of the
 4 phrase informal liaison?
 5 A. I really don't know, sir. I am not
 6 sophisticated. We have to look into the book. I
 7 think it is some guy who has not any official
 8 position and serves as a go-between.
 9 Q. Do you think that Jeb Bush was a
 10 go-between?
 11 A. No.
 12 Q. Between Miami Cuban leadership and the
 13 White House?
 14 A. No, he was not. In my perception he
 15 was not.
 16 Q. What was he then?
 17 A. The son of the president.
 18 Q. Did he perform any communication roles
 19 between the Cuban exile leaders --
 20 A. I don't know, you have to ask him.
 21 Q. Did he perform any for you, with you?
 22 A. Once he helped me in reaching the
 23 White House.
 24 Q. One time only?
 25 A. Yes.

1 Q. Would you say he was a liaison in that
 2 case, in that event?
 3 A. Not necessarily.
 4 Q. How would you characterize it?
 5 A. Someone who helped me to convey a
 6 message to the White House.
 7 Q. Now looking at paragraph, the first
 8 paragraph again, beginning, "let us be clear," do
 9 you notice the footnotes?
 10 A. Where is it?
 11 Q. Footnotes 53 and 54?
 12 A. You mean the footnotes, to go back and
 13 look at the footnotes?
 14 Q. Yes.
 15 A. Footnotes 53 and 54.
 16 Okay, what is the question?
 17 Q. Do those footnotes cite anything
 18 written by or provided by any statements by
 19 Mr. Planas?
 20 A. I don't know, sir. I don't know what
 21 the instructions of this newspaper journalist
 22 were, I don't know whether one of the researchers
 23 was Planas; probably yes, but I don't know.
 24 Q. But they don't say that, do they?
 25 A. Well, I don't know.

1 Q. And ordinarily footnotes indicate
 2 where the source of a material comes from, is
 3 that correct?
 4 A. Yes, that's what it usually means.
 5 Q. Thank you, sir.
 6 A. You are welcome, sir.
 7 Q. Look at page 25, under the heading A
 8 Tactical Agenda, the last paragraph on the page
 9 which starts along these same lines, could you
 10 just read that paragraph and the next and I will
 11 ask a couple of questions about it.
 12 A. Okay.
 13 (Pause.)
 14 A. Okay, what is the question?
 15 Q. The first question is, do you agree
 16 that there are more moderate elements in the
 17 Cuban community who should be consulted the
 18 making of Cuban policy that is more moderate than
 19 CANF?
 20 A. It depends on what moderate means,
 21 what moderate means for you. Give me a
 22 description, be more precise.
 23 Q. I think we should go on the premise
 24 that in this deposition it is your definitions
 25 and your understandings that we are interested

1 Q. Well, isn't 53 Oppenheimer's, Castro's
 2 Final Hour?
 3 A. I don't know, I don't have it in front
 4 of me.
 5 Q. It is here, right here.
 6 A. -You got a reference here of a
 7 footnote.
 8 Q. That's all I am asking you.
 9 A. But your question is if any of those
 10 articles here quote or use the Planas sources and
 11 my question is I don't know, I don't have those
 12 articles in front of me.
 13 Q. Let's start with the question which is
 14 whether the footnotes refer to anything by
 15 Planas.
 16 A. No.
 17 Q. Okay.
 18 A. Those two notes, but there are other
 19 here, 36 refer to Planas, 28 refer to Planas, so
 20 you can see that this article took in
 21 consideration the opinion, 55 also, Comments of
 22 Ricardo Planas at the SSI Round Table, 36 Planas,
 23 Why Does Castro Survive, 28, Richard Planas, Why
 24 Does Castro Survive. And this is just looking
 25 very quick through these pages here.

1 in, so please tell me what --
 2 MR. CANTERO: Actually shouldn't it be
 3 Schulz' understanding as to his word?
 4 MR. OVELMEN: I am asking whether he
 5 agrees with it. I assume --
 6 THE WITNESS: That's a different
 7 question now, that is a different question.
 8 Go ahead, what is the question.
 9 MR. CANTERO: The first question was
 10 what he, Schulz meant and --
 11 MR. OVELMEN: I don't think that was
 12 the question, but let's restart and just
 13 say:
 14 BY MR. OVELMEN:
 15 Q. With respect to --
 16 A. One at a time, one at a time.
 17 Q. Yes. There are, the sentence, "There
 18 are other more moderate elements in the Cuban
 19 American community who should be consulted in the
 20 making of our Cuban policy," do you agree with
 21 that?
 22 A. What moderate means?
 23 Q. You tell me what it means and then
 24 tell me if you agree with it.
 25 A. Because we are very moderate people in

Page 1594

1 the Cuban American National Foundation. So there
 2 are more moderate than we are, I doubt it. I
 3 haven't found them.
 4 Q. Okay. What does your definition of
 5 moderate encompass?
 6 A. People more or less middle of the
 7 road, middle of the road, reasonable individual,
 8 prudent people who take civilized attitudes and
 9 try to be a law-abiding citizen. That's what
 10 moderate means.
 11 Q. And with respect to Cuban policy, what
 12 positions then would be associated with the
 13 moderate view?
 14 A. The moderate view.
 15 Q. In your --
 16 A. The one that we have taken, that we
 17 want a peaceful transition to democracy in Cuba,
 18 no bloodshed, no vengeance; that the Cuban people
 19 will have an opportunity to share in the wealth
 20 of the country; that there will be no struggle of
 21 class, no class struggles in Cuba; that the Cuban
 22 people has a right to participate in a free and
 23 democratic election as soon as the transition
 24 takes place; that the Cubans exiled should make a
 25 substantial contribution in the rebuilding of the

Page 1595

1 country and should not discriminate against their
 2 brothers and sisters in Cuba, that the Cuban
 3 nation and the Cuban people should share in the
 4 wealth of that country by probably instituting a
 5 voucher program like the one in Czechoslovakia.
 6 I think that those are very moderate
 7 position consistent with the democratic ideals of
 8 the Cuban people.
 9 Q. What would the moderate position be
 10 with respect to dialogue?
 11 A. We think that dialogue is good. The
 12 only problem is that a dialogue with Castro can't
 13 find any justification whatsoever because Castro
 14 has refused to dialogue all along and also
 15 because Castro does not enter into any dialogue,
 16 Castro enters only in a monologue and he is the
 17 only one speaking at any meeting.
 18 A dialogue with the second, third man
 19 down, probably that would be very, very useful
 20 and we support that. We have said that with the
 21 exception of Fidel and Raul Castro we should find
 22 a solution to the Cuban problem and you cannot
 23 find with those two individual because they are
 24 the source of the problem and therefore they
 25 cannot be part of the solution.

Page 1596

1 Q. So your position with respect to
 2 dialogue would be dialogue would be appropriate
 3 but not with respect to Fidel or Raul Castro?
 4 A. That's correct.
 5 Q. But dialogue with lower, really just
 6 about anyone other than that?
 7 A. Yes, and that has been publicly
 8 stated.
 9 Q. With respect to the embargo?
 10 A. The embargo is a sound, good policy as
 11 it was good, sound, moderate policy regarding the
 12 embargo in Haiti. The embargo against the
 13 Dictator Cedras, the embargo against Dictator
 14 Pinochet in Chile, the embargo against the racist
 15 government of South Africa, those were very
 16 moderate position tools of public diplomacy and
 17 that's what the embargo toward Cuba is all
 18 about.
 19 It is a very moderate position, it is
 20 a very moderate tool, is not war, is not
 21 confrontation or economic tools that are used by
 22 the democratic system to try to promote democracy
 23 where tyranny is the system.
 24 Q. And remittances?
 25 A. Remittances, humanitarian assistance,

Page 1597

1 we support remittances to Cuba, consisting of
 2 food, clothes and medicine. That has been the
 3 position of the foundation, of myself; very
 4 moderate.
 5 We support that. We are on record on
 6 that and we have made that public. That, I think
 7 that is consistent with the very moderate
 8 position.
 9 Q. And with respect to the Helms-Burton
 10 legislation and providing lawsuits?
 11 A. The Helms-Burton bill is a very
 12 moderate approach to protect the thousands and
 13 thousands of American citizens that properties
 14 were illegally taken away from them. It is a
 15 tool that support the American people to go to
 16 their own US courts to sue those who are
 17 trafficking with their stolen properties. I
 18 think that it was a long overdue bill and nobody
 19 can object, especially you, an attorney, the
 20 right that your citizen has to go to a US court
 21 to claim what belonged to them. And that's what
 22 the Helms-Burton bill is all about, is a very
 23 moderate position and we support it.
 24 Q. I always welcome any kind word about
 25 attorneys.

1 A. Sure.
 2 MR. CANTERO: They're few and far
 3 between.
 4 A. Especially when it comes to
 5 litigation, you know, it would open an unlimited
 6 amount of opportunity for people like you.
 7 Q. This deposition is getting better by
 8 the moment.
 9 Now, sir, having defined moderate for
 10 me, the report refers to more moderate. Who
 11 would be people then who would be or groups who
 12 would be more moderate.
 13 MR. CANTERO: Objection. The term
 14 moderate is fraught with so much political
 15 overtones that I think you can only
 16 interpret the word moderate depending on the
 17 prospective of the person making that
 18 statement.
 19 So more moderate to the author of this
 20 article may be a different definition than
 21 more moderate to Mr. Mas or to you.
 22 MR. OVELMEN: I think that's right.
 23 Let me ask it differently.
 24 BY MR. OVELMEN:
 25 Q. Are there people, given your

1 person is less moderate, which isn't
 2 necessarily true.
 3 BY MR. OVELMEN:
 4 Q. My only question is the report speaks
 5 of more moderate. I'm not trying to fence with
 6 you or trap you in any way.
 7 The report speaks of more moderate
 8 groups. I am simply wondering if you are aware
 9 of any groups you would consider to be more
 10 moderate than CANF.
 11 A. I think that the question should be
 12 properly asked to those who made those type of
 13 description and write that type of things, you
 14 know. So you are free to ask those questions to
 15 those individuals.
 16 MR. CANTERO: The question is do you
 17 know of any groups that are more moderate
 18 than CANF, if you can answer that question.
 19 BY MR. OVELMEN:
 20 Q. Yes, that's the question.
 21 A. No, I am, I am, I refuse to go into
 22 details of more moderate or less moderate. I
 23 think that I gave you a response of what moderate
 24 in my view is and how we define ourself.
 25 Q. Under your definition is it possible

1 definition of moderate, are there people who you
 2 would consider to be more moderate?
 3 A. Well, I refuse to answer that question
 4 on the fact that you already asked me for a very
 5 lengthy definition of moderate.
 6 Now to go into terms of what is half
 7 more moderate, what is more moderate, what is two
 8 way more moderate, what is three pounds less
 9 moderate, I am not going to answer that. I think
 10 this is getting into the semantics of a word that
 11 I am not an expert on that.
 12 I think that I have answered your
 13 question fully and I am just not going to refer
 14 to what is more or less moderate.
 15 MR. CANTERO: I am just going to --
 16 MR. OVELMEN: Go ahead.
 17 MR. CANTERO: I am not instructing him
 18 not to answer the question but I do have an
 19 objection to, not to your question, Rick,
 20 but to the use of the word more moderate in
 21 the article, in a certain sense more
 22 moderate is like more pregnant or whatever,
 23 another sentence it is not, but somebody may
 24 be moderate or not moderate. But more
 25 moderate than others implies that that other

1 to be more moderate or less moderate?
 2 A. I don't know. I really don't know. I
 3 haven't gone into that mental exercise.
 4 Q. The next paragraph begins, "One way of
 5 doing this is to depoliticize Radio Marti. As
 6 matters now stand the station's favorable detail
 7 coverage of Mas Canosa" --
 8 A. Where is it?
 9 Q. This is the next paragraph, page 26.
 10 "As matters now stand the station's
 11 favorable detailed coverage of Mas Canosa and
 12 CANF gives the impression that the latter's
 13 projects and leaders represent US policy."
 14 Do you agree with that?
 15 A. No.
 16 Q. What would be your basis for
 17 disagreeing with it?
 18 A. That I am the least covered of all the
 19 Cuban American leaders in the United States, I am
 20 the least covered, the least talked about leader
 21 of the Cuban American community in Radio Marti.
 22 Q. What is the basis for that statement?
 23 A. The research and the study that has
 24 been conducted that it would be very easy for you
 25 to get from Radio Marti. Many studies and many

Page 1602

1 research has been done.
 2 Q. There is research --
 3 A. That I am the least covered of all the
 4 leaders in Radio Marti.
 5 Q. Are you saying you have seen this
 6 research?
 7 A. Yes, I have. It is in Radio Marti.
 8 You can subpoena.
 9 Q. Well, we will.
 10 A. Sure. I invite you to do it.
 11 Q. Who are the most covered?
 12 A. I don't know. I am not.
 13 Q. I am just wondering who the others
 14 would be, if you are the least covered, you have
 15 seen the data.
 16 Have you seen the data?
 17 A. No, I only cared about my data and my
 18 data is that I am the least covered of all the
 19 Cuban leaders in Radio Marti.
 20 Q. I am just wondering who are these
 21 other leaders?
 22 A. I really don't know. It is in the
 23 report. You have to read it.
 24 Q. Have you read the report?
 25 A. I read the part of report specifically

Page 1603

1 the one covering me.
 2 Q. Who prepared the report?
 3 A. It was Radio Marti.
 4 Q. But who?
 5 A. The management of Radio Marti, the
 6 research department of Radio Marti on the news
 7 department of Radio Marti. I cannot give you the
 8 exact detail of who wrote the document but the
 9 research is there. It is very easy.
 10 Q. When was the report prepared?
 11 A. Sometime ago, I don't remember.
 12 Q. What was the name --
 13 A. A month, a year, two years.
 14 Q. What was the name of the report?
 15 A. I don't know the name of the report.
 16 The report is there. That's done constantly and
 17 this is put up to date on a constantly basis. So
 18 this is an ongoing research. These are records
 19 that are kept on Radio Marti.
 20 Q. All right, sir. But you can't tell me
 21 who any of the other leaders were that were
 22 considered?
 23 A. No. They were all the other leaders
 24 in the Cuban American community.
 25 Q. Who would they be?

Page 1604

1 A. As of names and what kind of coverage
 2 they get, I don't recall so I am not going to
 3 give you an answer on that.
 4 Q. But who would you consider to be other
 5 leaders of the Cuban American community?
 6 A. There are many.
 7 Q. I know there are many, I would like to
 8 just have your understanding of who they would
 9 be.
 10 A. Well, you have other leaders of the
 11 community, Carlos Alberto Montaner, Roberto
 12 Rodriguez Aragon, you have a lot of them. ✓
 13 Q. That is two, how many more could you
 14 name?
 15 A. I don't know. I don't go through that
 16 mental exercise. There are many leaders. You
 17 can do a research of your own, you will find
 18 there are many leaders.
 19 Q. And it is your position that there is
 20 a research study that shows that you are
 21 mentioned and covered less often than these
 22 people?
 23 A. That's correct.
 24 Q. Okay.
 25 A. Yes, sir, that's correct.

Page 1605

1 Q. But you can't tell me who performed it
 2 or when it was performed?
 3 MR. CANTERO: Objection, he said --
 4 THE WITNESS: I already answered.
 5 MR. CANTERO: He said approximately
 6 when it was performed.
 7 BY MR. OVELMEN:
 8 Q. When was it?
 9 A. And by who it was performed.
 10 MR. CANTERO: A few months or couple of
 11 years ago with, in that time frame, and he
 12 said that it was the management of Radio
 13 Marti.
 14 MR. OVELMEN: All right, sir.
 15 BY MR. OVELMEN:
 16 Q. Do you agree with the statement that
 17 those who disagree with the foundation's approach
 18 to the Cuban problem including Cuba's most
 19 important dissident, Elizardo Sanchez, tend to
 20 find that their views are downplayed?
 21 A. Yes, I disagree.
 22 Q. Sir, do you listen to Radio Marti?
 23 A. If I listen to?
 24 Q. Do you listen to Radio Marti?
 25 A. Once in a while.

1 Q. How often?
 2 A. Probably for a few minutes once a
 3 month, something like that, but I read mostly of
 4 the reports.
 5 Q. Do you get transcripts of the
 6 programming?
 7 A. No, I don't.
 8 Q. What is the basis then of your
 9 knowledge of what's being aired by radio matter?
 10 A. I get a full report on the official
 11 board meetings of Radio Marti.
 12 Q. How often are the board meetings?
 13 A. Around once a month, every two months
 14 more or less.
 15 Q. Are these written reports?
 16 A. Yes.
 17 Q. Who prepares them?
 18 A. The whole department, each department
 19 writes a report which is under the responsibility
 20 of them, depending on what the report, research
 21 department writes research report, news
 22 department writes news reports, programs writes
 23 about programs reports; what is done usually in
 24 every business.
 25 Q. And in these reports, in these

1 under the direction of non-political leadership
 2 less susceptible to pressure by clientele
 3 groups"?
 4 A. Yes, because it is the case of Radio
 5 Marti, it is objective, it is credible, it is
 6 under the leadership of non-political individuals
 7 and they are not susceptible of pressure by any
 8 clientele group. That is the case of Radio Marti
 9 and any reinforcement of that position is
 10 welcome. I agree with that.
 11 Q. So would you disagree, then, that the
 12 recommendation, with the recommendation that TV
 13 Marti should be closed?
 14 A. Yes, I disagree with it.
 15 Q. And do you agree that it is in
 16 violation of international conventions?
 17 A. I disagree.
 18 Q. Do you agree that it has provoked
 19 Castro into retaliating by interfering with US
 20 broadcasts?
 21 A. What is the question?
 22 Q. Do you agree that TV Marti has
 23 provoked Castro into retaliating by interfering
 24 with US radio broadcasts?
 25 A. I don't think it has.

1 reports, do they discuss how often exiled leaders
 2 or Cuban American community leaders --
 3 A. Usually not but those reports are
 4 available to anyone who might request them and I
 5 will beg you to do it.
 6 Q. So these reports that you get every
 7 two months don't deal with how much coverage
 8 various figures are receiving?
 9 A. No, usually not. Sometime yes, but
 10 usually not.
 11 Q. So the studies you are talking about
 12 are different, different study; is it one study
 13 that was done or several studies?
 14 A. I already answered that question, you
 15 please don't make to me to repeat and repeat, we
 16 will be here forever. I are already said that is
 17 an ongoing report.
 18 Q. It is an ongoing report?
 19 A. I already answered that. If you paid
 20 attention here we will get much better.
 21 This report is an ongoing report that
 22 is updated constantly.
 23 Q. Do you agree with the recommendation
 24 in that paragraph, quote, "To assure its
 25 objectivity and credibility it should be placed

1 Q. You don't think it has?
 2 A. Yes, I disagree.
 3 (Witness and counsel confer off the
 4 record.)
 5 MR. CANTERO: Do you have the original
 6 of that thing?
 7 MR. OVELMEN: You can have that.
 8 MR. CANTERO: I have copies.
 9 MR. OVELMEN: Is that an extra copy?
 10 THE WITNESS: Let me have it.
 11 MR. OVELMEN: Yes.
 12 THE WITNESS: Go ahead.
 13 BY MR. OVELMEN:
 14 Q. Is it your understanding that prior to
 15 the planes being shot down this past year, the
 16 two airplanes, that Radio Marti was broadcasting
 17 on the air that a plane was dropping leaflets in
 18 Cuba over Havana?
 19 A. I don't know those details. I don't
 20 get involved in details of Radio Marti.
 21 Q. So the answer is you don't know?
 22 A. I don't know.
 23 Q. Would it seem unreasonable to you for
 24 a journalist to rely on a report by the, a report
 25 published by the Strategic Studies Institute of

1 the US Army War College?
 2 A. What is the question? You didn't
 3 complete the question.
 4 Q. Would it seem unreasonable to you,
 5 would you regard it as unreasonable?
 6 A. What?
 7 Q. For a journalist to rely on a report
 8 published by the Strategic Studies Institute of
 9 the US Army War College?
 10 A. Yes, especially when the report is
 11 full of distortion and it disinformed completely
 12 its readers, yes, I do.
 13 Q. Are you familiar with the reputation
 14 of the SSI for its reports?
 15 A. No, I am not familiar with the
 16 Strategic Studies Institute, no, I am not, sir.
 17 I would be lying if I told you that I was.
 18 Q. We don't want that.
 19 MR. OVELMEN: This will be marked as
 20 next.
 21 MR. CANTERO: 154.
 22 (Defendants' Exhibit 154 was marked for
 23 identification.)
 24 (Pause.)
 25 THE WITNESS: What is the question?

1 Q. Looking at the bottom of page 3,
 2 answer that is translated as, "This is shit,
 3 'mierda crap', if they haven't been able to take
 4 over Miami, if we throw them out of here, how are
 5 they going to take over our own country? The
 6 Americans do not have to be the owners of Cuba,
 7 we have the money, the capacity and the
 8 knowledge.
 9 "I also am in favor of giving the
 10 Cubans on the island an important participation.
 11 It must move from being a country of proletarians
 12 to one of proprietors and we have the most simple
 13 formula to accomplish that. The day after Fidel
 14 Castro falls we will convert 4 million Cubans
 15 into proprietors. We will give each person a
 16 house to own, the one he lives in now. The old
 17 owners will not have the right to reclaim houses.
 18 "We will do the same with those who
 19 run barber shops, shoemakers' shops, small
 20 chicken farms, everything which now is the
 21 government's."
 22 Do you see in the original Spanish
 23 language article an answer for which this
 24 corresponds as a fair translation?
 25 A. Yes, there is answer here. There is

1 MR. OVELMEN: And this will be a
 2 composite exhibit.
 3 MR. CANTERO: Is that another?
 4 MR. OVELMEN: It is a translation.
 5 (Deposition Exhibit 155 was marked for
 6 identification.)
 7 MR. CANTERO: The translation is 155,
 8 is that what you are saying?
 9 MR. OVELMEN: Yes.
 10 THE WITNESS: Okay, what is your
 11 question?
 12 MR. CANTERO: Just for the record, this
 13 isn't a certified translation.
 14 MR. OVELMEN: This is not certified.
 15 That's why I'm going to ask him whether it
 16 is an accurate translation.
 17 BY MR. OVELMEN:
 18 Q. Looking at the translation first, page
 19 3, bottom?
 20 A. Okay, go ahead.
 21 MR. CANTERO: For the record 154 seems
 22 to be an article in El Pais.
 23 MR. OVELMEN: Yes.
 24 THE WITNESS: What is your question?
 25 BY MR. OVELMEN:

1 an answer here. That is your question?
 2 Q. Yes, that's correct?
 3 A. There is an answer here, yes.
 4 Q. Do you consider it to be an accurate
 5 translation?
 6 A. No, sir.
 7 Q. Can we go through --
 8 A. Wait a minute, wait a minute.
 9 The translation may be accurate, I
 10 haven't seen the translation.
 11 Q. That's all I am asking first. My
 12 first question --
 13 A. I haven't read the translation.
 14 Q. Could you compare them, please.
 15 MR. CANTERO: Bottom of page 3 and top
 16 of page 4.
 17 (Pause.)
 18 THE WITNESS: Yes, that's correct, the
 19 translation is correct.
 20 BY MR. OVELMEN:
 21 Q. The translation is correct. All
 22 right, sir.
 23 First off, is this translation and the
 24 original Spanish, is that an accurate quotation
 25 from you?

1 A. No, it is not.
 2 Q. All right, sir. Can you, on the
 3 translation, the English language translation,
 4 tell me what is incorrect.

5 A. First "mierdra", shit, that is not my
 6 language, I never use it. You know what that
 7 means, right?

8 MR. CANTERO: He can read the
 9 translation.

10 MR. OVELMEN: Yes, I assure you I know
 11 what shit means.

12 THE WITNESS: The other thing that I
 13 can't --

14 MR. OVELMEN: You can't have a four
 15 year old and not know the answer to that.

16 THE WITNESS: The other thing that I
 17 disagree is that "we have thrown them out of
 18 here."

19 Those two things are misquotes, like
 20 there is another "mierdra" in this article
 21 that I was reading, that I never use that in
 22 interview, not even in talking to friends,
 23 it is not my repertoire, I don't use it.

24 BY MR. OVELMEN:

25 Q. Is that because it is sort of a

1 with our opinions and some of them even have left
 2 Dade County. And we have kept pretty much our
 3 own custom, culture, language. We live in our
 4 own environment here.

5 So if we have been able to do that
 6 here and survive the tremendous influence of this
 7 society, how are we going to submit ourself once
 8 Cuba becomes a free nation, to the will of
 9 another nation?

10 Q. So, I mean, what you object to is the
 11 colloquial impression that somehow the Anglos or
 12 whatever we want to call that, non-Hispanic
 13 group, have been thrown out, they haven't been
 14 thrown out?

15 A. And I felt very sorry about, and I
 16 still understand what the journalist said because
 17 that's very typical of the Spanish people, they
 18 like to be very graphic, they like to use strong
 19 words. They really want to penetrate the mind of
 20 the readers and they use that type of
 21 exaggeration.

22 And he was very candid about that one
 23 when he learned that I disagreed with that and he
 24 said, well, I know you didn't mean that and I
 25 probably went overboard. But, you know, I agree

1 vulgarity or crudity?

2 A. I just don't use it, for whatever
 3 reason, I don't know, I don't use it.

4 Q. Other than the use of the word
 5 "mierdra" and "if we have thrown them out of
 6 here, how are they going to take over," is that
 7 whole sentence wrong?

8 A. Which one?

9 Q. "If we have thrown them out of here
 10 how are we" --

11 A. That is a misquote.

12 Q. Okay.

13 Other than those two is the rest of
 14 this accurate?

15 A. Yes, it is accurate, yes.

16 Q. What did you say instead of "mierdra"
 17 and "if we have thrown them out of here how are
 18 they going to take over our own country?"

19 A. I just said when he told me that we
 20 might be controlled by the North Americans in
 21 Cuba, I said, that will never happen. I mean, we
 22 are very independent people here. And we have
 23 our own opinions and we have our strong feelings
 24 here.

25 And there are many people who disagree

1 he felt very sorry about that, that he did that.

2 Q. So the tenor is that it is an
 3 exaggeration or it is an overblown colloquialism?

4 A. I think that he took it another way
 5 from which it was expressed and meant.

6 Q. Okay.

7 Do you recall whether this was a taped
 8 interview?

9 A. I don't remember the interview.

10 Probably so. I never object to any taped
 11 interview.

12 Q. Which would be the better evidence of
 13 what you said, the tape or your recollection
 14 today?

15 A. I don't know what would be better, the
 16 tape or not. If there is a tape, a tape I think
 17 would be very reliable.

18 Q. Thank you.

19 THE WITNESS: Over with this? Okay.

20 MR. OVELMEN: This will be marked as
 21 the next exhibit.

22 (Deposition Exhibit 156 was marked for
 23 identification.)

24 THE WITNESS: What is this?

25 BY MR. OVELMEN:

1 Q. Mr. Mas, these are, as they indicate
 2 on them, are public property realty -- real
 3 estate records, public records that relate to
 4 transactions in which you have been involved.
 5 My first question is, I notice that
 6 Thomas Carlos is involved in the first several.
 7 Do you recall what those transactions
 8 were?
 9 A. Yes. I have been involved in several
 10 real estate investments. This is a complicated
 11 sheet of paper which has a lot of numbers and
 12 dates and file numbers and, so, I don't know
 13 exactly what it means. But, yes, I do admit that
 14 I have been involved in several real estate
 15 investments which I have done in the past.
 16 Q. The first four, five, are all
 17 quitclaim deeds dated 6/8/82 and reflect that
 18 Thomas Carlos was involved, it appears to be as a
 19 trustee, and yourself.
 20 Do you recall what that transaction
 21 was?
 22 A. No, I don't. Quitclaim deed is when
 23 you sell a property, right?
 24 Q. That's correct.
 25 A. Probably some of the properties that I

1 A. Yes.
 2 Q. Are there others?
 3 A. Yes.
 4 Q. Who are they?
 5 A. Tom Carlos, Mickey Muscat, the same
 6 people I mentioned before.
 7 Q. Anyone else?
 8 A. No.
 9 Q. I think you only mentioned about four
 10 people.
 11 A. Not that I recall, no, sir.
 12 Q. Looking at the next one down, let's
 13 see, looking at this one, it is reflected as
 14 being a warranty deed that was dated 10/31/78,
 15 and involved Maurice L. Rahal, do you know what
 16 that transaction --
 17 A. No, I don't.
 18 Q. Do you recall anything about it?
 19 A. No.
 20 Q. The next one of note is a mortgage
 21 dated 4/22/81 and it appears to involve yourself
 22 and Merchants Bank of Miami. Do you recall that
 23 transaction?
 24 A. Sir, I would have to go back to some
 25 records and look at this closely. I don't recall

1 sold, yes.
 2 Q. Do you recall -- but you don't recall
 3 what property?
 4 A. No, I would have to look at the
 5 township, the range and all that.
 6 Q. Did you own a great deal of property
 7 in that 1982 period?
 8 A. No, I didn't own that much. I owned
 9 small pieces spread around but I didn't own that
 10 much.
 11 Q. Where would the funding have come for
 12 that realty that you owned at that time?
 13 A. As far as my investment is concerned,
 14 from my own pocket.
 15 Q. And were there other people involved
 16 in these investments?
 17 A. There were some, yes.
 18 Q. Do you recall who they would have
 19 been?
 20 A. I already mentioned them a little
 21 while ago.
 22 Q. The same people that were involved in
 23 a couple of the other transactions?
 24 A. Right.
 25 Q. That we talked about?

1 that.
 2 Q. Do you have records that reflect these
 3 transactions?
 4 A. I disposed of all these properties
 5 here and I don't have the records at hand. I
 6 would have to go to Dade County records and be
 7 more thorough on this. But I don't have a
 8 recollection exactly now of all these
 9 transactions here. I don't hold real estate now,
 10 just very, very few properties.
 11 Q. Would Mr. Carlos have these records?
 12 A. I don't know. You have to ask him.
 13 Q. Was he the attorney on all of those
 14 transactions?
 15 A. In some of them, yes, he was.
 16 Q. Was he the attorney on this particular
 17 one?
 18 A. I don't recall. If I don't recall I
 19 cannot tell you who the attorney was.
 20 MR. CANTERO: For the record, this
 21 mortgage was apparently filed in 1981.
 22 MR. OVELMEN: Yes. I think I said it
 23 was 4/22/81.
 24 THE WITNESS: It is 22 years back, '73,
 25 '73, '73, that's the property that I had

1 in Homestead that I mentioned before.
 2 BY MR. OVELMEN:
 3 Q. Looking at the next one which is also
 4 a mortgage dated the same day, in between I guess
 5 there is another mortgage actually dated 1/12/89,
 6 do you recall what that might be?
 7 A. Which one is that?
 8 Q. It is in between the two that are
 9 dated 4/22/81.
 10 MR. CANTERO: 1/20/89?
 11 MR. OVELMEN: Yes.
 12 THE WITNESS: Merchant Bank?
 13 BY MR. OVELMEN:
 14 Q. Right, correct?
 15 A. No, I don't recall that. It must be a
 16 property mortgage I got on a property but I don't
 17 have the details. ?
 18 Q. What about the next one which was
 19 Continental National Bank dated 3/29/76?
 20 A. Is that a mortgage?
 21 Q. Yes, sir.
 22 A. I don't know.
 23 Q. And the next one, 3/1/78?
 24 A. Wisnesky?
 25 Q. Yes.

1 Q. Do you recall who all was involved in
 2 that deal?
 3 A. Well, Mr. Huff showed me, I bought it
 4 from Mr. Huff.
 5 Q. Mr. Huff?
 6 A. Huff, should be in records.
 7 Q. He was the trustee of the seller?
 8 A. I bought it from him, I don't know
 9 what he was but I bought it from him.
 10 Q. How about the next one dated 6/12/79,
 11 is the instrument, date filed 5/21/84?
 12 A. Yes?
 13 Q. Do you recall that?
 14 A. This all this refers to that piece of
 15 land in Homestead all the way down.
 16 Q. All the way down?
 17 A. Yes.
 18 Q. Why was the filing date five years
 19 after the date of the instrument?
 20 A. I don't know, sir.
 21 Q. You don't know?
 22 A. You have to ask the attorneys.
 23 Q. Who would the attorney be?
 24 A. Probably it was sold for, it was sold
 25 with what is called, how did you used to call

1 A. That was a piece of property that I
 2 bought from this lady where Church & Tower used
 3 to be.
 4 Q. How much was the purchase price?
 5 A. Around 10,000 I think it was, a small
 6 lot, a small property.
 7 Q. Did you buy that on your own or was it
 8 part of a trust, were you a trustee?
 9 A. I bought it with my wife, I think she
 10 gave me a mortgage for 10 or 15 years.
 11 Q. Going down to the series of partial
 12 releases of mortgages?
 13 A. Right, those are properties.
 14 Q. And --
 15 A. That is property that I referred to
 16 you before that we bought it from, I think,
 17 Atomic Realty, Atlantic was involved I think in
 18 the syndication, we used that corporation to
 19 syndicate that land and those were partial
 20 release of pieces of land that we sold.
 21 Q. What was the purchase price of that?
 22 A. Like I said, it happened 20 some years
 23 ago, 24, 25.
 24 Q. Do you have a ballpark number?
 25 A. No.

1 that, agreement for deed or something like that.
 2 Q. Could be. Was Mr. Carlos the attorney
 3 on that transaction for you?
 4 A. I think so. Sometimes I used Eliot
 5 Abbott also, but I don't know.
 6 Q. Now this next one, top of the next
 7 page is a mortgage that was executed 7/30/76 and
 8 filed 8/5/76.
 9 Do you recall what that --
 10 A. Which one, Theo?
 11 Q. Yes?
 12 A. I think that was a piece of land,
 13 small lot that I bought on 16 Street Southwest
 14 and 37 Avenue.
 15 Q. What would the source of funding have
 16 been for that?
 17 A. My own pocket, my own wealth, my own
 18 resources.
 19 Q. Did you have other people involved in
 20 that investment?
 21 A. No, not in that deal.
 22 Q. What was the purchase price of that?
 23 A. I don't remember, sir. It was not
 24 much. We were talking here in the thousands of
 25 dollars. Most of them were all bought with

1 mortgages 10, 15, up to 20 percent down.
 2 Q. It reflects you as being the trustee
 3 on that but you were acting individually, not as
 4 part of a syndicate or group?
 5 A. No, I was acting on my behalf.
 6 Q. On your own behalf.
 7 Now the next listing is the
 8 satisfaction of a mortgage dated 8/31 -- that is
 9 all part of that same transaction then?
 10 A. Anything that has that Mickey Muscat
 11 is the same as on the page before in Homestead.
 12 Q. The same?
 13 A. Yes.
 14 Q. The next one which is a satisfaction
 15 dated 7/30/76, there is a notation, Leafy Way,
 16 can you recall what that one was?
 17 A. No. This probably was a lot that in
 18 Coconut Grove with a small house on it which I
 19 bought but that was 20 years ago, my recollection
 20 of it.
 21 Q. The reference again moving on down to
 22 Davis Citrus Farms, do you see the one, the
 23 instrument is dated 6/19/75, file date 7/3 and --
 24 A. What happened, what is the question?
 25 Q. What kind of a transaction, what was

1 A. Same thing.
 2 Q. Same thing?
 3 A. Yes.
 4 Q. Also part of that same transaction.
 5 Then going down a little bit, there is
 6 a reference to Stuart Huff trustee, again another
 7 partial release of mortgage. Is that part of the
 8 same deal or is that a different deal?
 9 A. Same deal.
 10 MR. CANTERO: When you say, are you
 11 talking about the 3/6/74?
 12 MR. OVELMEN: It is the 3/6/74, right,
 13 it looks to me that is what the Stuart Huff
 14 one is.
 15 MR. SCHWIEP: Yes.
 16 MR. OVELMEN: It is not that easy to
 17 tell which is why I am asking him. These
 18 records are not so clear.
 19 BY MR. OVELMEN:
 20 Q. What is the Whom Concerned entry on
 21 the next, right below Stuart Huff?
 22 A. What?
 23 Q. Whom Concerned, do you recall what
 24 that transaction was? It appears to be a
 25 quitclaim deed maybe, although it could be

1 that?
 2 A. I don't recall.
 3 Q. You don't remember?
 4 A. No.
 5 Q. The next one is an Atlantida
 6 Enterprises?
 7 A. Same thing, that is the one in
 8 Homestead.
 9 Q. That is dated 2/11/81 for the
 10 instrument date, filed 1/25/84, it is a partial
 11 release of the mortgage.
 12 Do you recall what Atlantida
 13 Enterprise, Inc., how you were owning it or were
 14 they selling it?
 15 A. I own a piece of it and there were
 16 other people in that syndication. That was the
 17 land that I told you we bought from Mr. Huff in
 18 Homestead and we sold that in small pieces.
 19 Q. And this was another part of that deal
 20 then, another piece of that?
 21 A. Yes, sir, everything.
 22 Q. So a partial release?
 23 A. Everything relates to this same
 24 property, yes.
 25 Q. And the next one that involves --

1 another partial release of mortgage.
 2 Do you recall that?
 3 A. No, I don't.
 4 Q. You don't remember?
 5 A. No.
 6 Q. Then we have a series of 1, 2, 3, 4, 5
 7 entries of Atlantida that are warranty deeds,
 8 mortgages, partial releases, satisfaction. Do
 9 you recall that transaction?
 10 A. Same thing, Homestead.
 11 Q. It's all the same thing?
 12 A. Piece of land that we bought and then
 13 we resell.
 14 Q. How much was, what were those
 15 transactions involving in terms of money? How
 16 much money were all of those?
 17 A. I don't recall. They were in the
 18 thousands of dollars.
 19 Q. So these were major, was it a major
 20 investment?
 21 A. It was not a major investment.
 22 Q. It was not a major investment?
 23 A. No.
 24 Q. For you a major investment would be,
 25 what?

1 A. At what time?
 2 Q. Well, at the time?
 3 A. What period of time are you talking?
 4 Q. The time of these transactions which
 5 were from, looks like '76 through '80?
 6 A. For me a reasonable investment, you
 7 know, in the thousands of dollars that I could
 8 afford.
 9 Q. I am just trying to get a sense of
 10 what that means.
 11 A. At that time --
 12 Q. '76 through, it seems to be like '80,
 13 '76 through '81?
 14 A. From '76 to '81 any reasonable
 15 investment for me would be in the tens of
 16 thousands of dollars.
 17 Q. Tens of thousands.
 18 I won't asking what it would be
 19 today.
 20 MR. CANTERO: Don't ask me either.
 21 THE WITNESS: It is a matter of public
 22 record.
 23 BY MR. OVELMEN:
 24 Q. We know of one that was 200 million.
 25 The quitclaim deed that is referenced 3/13/80 or

1 going crazy buying land out there then you got a
 2 mortgage with a yearly payment and you resell the
 3 property before the next payment comes around and
 4 that was that type of operation.
 5 Q. Did you fund these transactions
 6 yourself or typically part of a group that was
 7 funding them?
 8 A. Typically it was part of a group. In
 9 very isolated cases was my own investment.
 10 Q. And how did you make your money that
 11 you put in? Where did that money come from?
 12 A. Working.
 13 Q. But I mean what kind of work?
 14 A. The same work that I have done all my
 15 life, Church & Tower of Florida.
 16 Q. In that period of time were you in
 17 Church & Tower?
 18 A. Yes, I was.
 19 Q. '74 to?
 20 A. Yes, I was in Church & Tower probably
 21 since 1968.
 22 Q. So you were self-funding for your
 23 share from earnings from Church & Tower?
 24 A. Yes, sir.
 25 Q. And the people you were investing

1 3/15/80 involving Pedro Rodriguez, Biscayne
 2 Garden, do you know what that refers to?
 3 A. No, I don't recall.
 4 Q. How about Alfredo Simon?
 5 A. I don't know.
 6 Q. 5/22/78, again there is a reference to
 7 Biscayne Garden section FPT 02. Does that make
 8 any bells ring?
 9 A. No.
 10 Q. Does this seem like a lot of real
 11 estate transactions to you?
 12 A. It seems like, but it is the same
 13 piece of land over and over and over.
 14 Q. Some of it is, yes. How much real
 15 estate investment were you doing back between,
 16 say, '75-'76 and '83-'84?
 17 A. Small pieces of land, a small
 18 investment. I used to give to them a get 5, 10,
 19 \$15,000 down payment.
 20 I bought a lot of those pieces here.
 21 I remember this guy here, Paul Alessi, this guy
 22 is a reverend in a church in South Miami. I
 23 bought a piece of property from him, right in the
 24 middle of the Everglades.
 25 That was the time when everybody was

1 with, where did their money come from, do you
 2 know?
 3 MR. CANTERO: Objection.
 4 THE WITNESS: Their own work.
 5 MR. CANTERO: Calls for speculation.
 6 MR. OVELMEN: I just asked him if he
 7 knew. I am not asking for him to speculate.
 8 THE WITNESS: That was their own
 9 money.
 10 BY MR. OVELMEN:
 11 Q. The partial release of a mortgage
 12 dated 6/12/79, I mean filed 6/12/79, dated
 13 5/24/79, relating to, it appears to relate to
 14 Nelson Escala but it could be H & J Paving. I am
 15 not sure which it is. Do you know which that
 16 would have been?
 17 A. Nelson Escala I don't know, I know who
 18 H & J Paving is.
 19 Q. Who is H & J Paving?
 20 A. A piece of land that I sold to a
 21 corporation called H & J Paving.
 22 Q. What was the size of that transaction?
 23 A. It was a lot, I think, for them to
 24 build a house.
 25 Q. H & J paving was going to build a

1 Q. I see. And what did that cost?
 2 A. I don't know, I think I sold that for
 3 20,000; 25, 20,000, I don't remember.
 4 THE VIDEOGRAPHER: Excuse me, sir, we
 5 are over the two hour mark on the tape. We
 6 need to change the tape.
 7 MR. OVELMEN: Certainly.
 8 (Recess.)
 9 THE VIDEOGRAPHER: We're back on the
 10 record. This is tape number 3.
 11 BY MR. OVELMEN:
 12 Q. We have another entry for Acosta
 13 Construction Corp. on a quitclaim deed 5/24/79.
 14 Is that a related transaction?
 15 A. It is the same thing, I sold him one
 16 lot.
 17 Q. You sold him one lot?
 18 A. Yes.
 19 Q. And all these quitclaim deeds are for
 20 one lot?
 21 A. I think so. I didn't sell him more
 22 than one lot.
 23 Q. Okay. And this warranty deed executed
 24 5/24 to H & J, that is the same one lot for them?
 25 A. They bought one lot only, yes.

1 Q. Now, this agreement referencing the
 2 City of Miami dated 1/21/77, filed 2/7/77, do you
 3 recall what that transaction would have been?
 4 A. I don't have the slightest idea, no,
 5 sir.
 6 Q. The quitclaim deed dated 6/8/82 and
 7 filed 6/16/82 involving Thomas Carlos and Liberty
 8 Life Insurance Company, do you recall what that
 9 would have been?
 10 A. No. You know, these transactions
 11 might be some mortgages that I bought for a
 12 discount price through a merchant bank which
 13 Jorge De Ona used to own, and there were several
 14 pieces of notes, mortgage notes outstanding and I
 15 really earned the spread between what I bought
 16 for at a discount price and what was the final
 17 payment on it. Probably some of this is, because
 18 I don't remember many of these notes.
 19 Q. Would Mr. Carlos have both been your
 20 lawyer and an investor in the deal or trustee or
 21 something?
 22 A. No, in this case he was not involved.
 23 Q. He was not involved?
 24 A. I did it through De Ona, D E O N A.
 25 Q. Because I notice he is listed here,

1 Q. I notice that they have a number of
 2 warranty deeds and mortgages. But it is all
 3 relating, your recollection is at least right now
 4 your recollection is that it is just one lot?
 5 A. Yes.
 6 Q. And the agreement that was dated
 7 3/12/76, filed 7/15/76, apparently involving
 8 Richard Tejera, what would that have been?
 9 A. I don't know, an agreement, I don't
 10 know.
 11 Q. You don't recall?
 12 A. No.
 13 Q. Who is Richard Tejera?
 14 A. I don't know.
 15 MR. CANTERO: Probably "Tejera."
 16 MR. OVELMEN: Tejera.
 17 BY MR. OVELMEN:
 18 Q. The warranty deed dated 6/17/76 filed
 19 6/28/77 references Paul Alessi, Jr., do you know
 20 what that would have been?
 21 A. Yes, that is a priest.
 22 Q. That's the priest you were referring
 23 to?
 24 A. Yes, that I sold him a piece of land
 25 west of Krome Avenue.

1 this is the last one on the sheet, the bottom of
 2 that page.
 3 MR. CANTERO: Which page?
 4 MR. OVELMEN: The page we are on, the
 5 page --
 6 THE WITNESS: Liberty Life.
 7 MR. OVELMEN: We are on the second
 8 page.
 9 THE WITNESS: That was probably a
 10 quitclaim deed on a mortgage that we had on
 11 a warehouse.
 12 BY MR. OVELMEN:
 13 Q. On a warehouse?
 14 A. Yes.
 15 Q. And would you have been investing in
 16 that as a group?
 17 A. Yes.
 18 Q. Do you recall what the purchase price
 19 was and the sales price?
 20 A. No.
 21 Q. Who would have been in that group?
 22 A. Tom Carlos and other investors.
 23 Q. Who would the other investors have
 24 been?
 25 A. I don't recall. It was a

Page 1634

1 house?
 2 A. Yes.
 3 Q. What was H & J Paving?
 4 A. A corporation, sir.
 5 Q. And was going to build a residence?
 6 A. I sold a residential lot to them. I
 7 don't know what they did with it.
 8 Q. Do you remember what the amount of
 9 that was?
 10 A. No, I don't.
 11 Q. How about the warranty deed dated
 12 1/2/79 filed 2/1/79, apparently relating to
 13 Descalzo, Christopher Descalzo?
 14 A. Descalzo, I think that this is the
 15 property, I sold this gentleman the same property
 16 that I bought back here from these guys, Theo. I
 17 bought it from Theo and I sold it to Descalzo.
 18 Q. These entries again on H & J Paving,
 19 are they the same piece of property?
 20 A. Yes, I think that he made the payments
 21 little by little.
 22 Q. Now you see the reference to the Coral
 23 Shores Enterprise, Inc. corporation we were
 24 talking about prior today. It appears to be a
 25 judgment entered on your behalf. Do you recall

Page 1635

1 that?
 2 A. Yes. I don't know if that relates to
 3 but that's how I ended up with an apartment unit
 4 in that Sea Gull building in Plantation Key that
 5 I referred to before.
 6 Q. Does that help refresh your
 7 recollection as having been president of the
 8 company then?
 9 A. I don't, that doesn't reflect --
 10 refresh anything. It just reconfirms that I
 11 ended up with a unit there because of the
 12 investment that I made there which I still have
 13 that unit.
 14 Q. You do?
 15 A. Yes. Beautiful unit, facing the
 16 Atlantic Ocean, nice breeze, beautiful.
 17 Q. Where was it at?
 18 A. Tavernier.
 19 Q. Tavernier. Is that where Jimmy
 20 Johnson...
 21 MR. SCHWIEP: Good course.
 22 Q. Not to belabor the point but for the
 23 judgment for Coral Shores Enterprises to be in
 24 your favor, that is to say, give you a right here
 25 under the property, you had to have either --

Page 1636

1 frankly, you would have had to own the company,
 2 is that correct, did you own Coral Shores --
 3 A. You know, I have attorneys acting on
 4 my behalf of that.
 5 Q. Who are the attorneys?
 6 A. Tom Carlos.
 7 Q. Tom Carlos?
 8 A. Yes. You can ask him.
 9 Q. Okay. And again I see Atlantida
 10 Enterprise, Inc. being listed.
 11 A. Same thing, it is the same thing, sir.
 12 Q. Okay. My question --
 13 A. I love to go back to the political
 14 thing. It gets boring here.
 15 Q. I enjoy listening to your political
 16 comments. As you know, I am a great defender of
 17 free speech, I enjoy hearing you.
 18 A. Are you?
 19 Q. Yes. That's what I do for a living.
 20 A. Welcome, welcome to the gang here.
 21 Q. I see more of you -- I defend them and
 22 you exercise them, the rights, I mean.
 23 3/17/71 is a date of an instrument and
 24 then it is recorded 3/7/79, about eight years
 25 later. Do you know why that would be? It is a

Page 1637

1 satisfaction of a mortgage.
 2 A. No, I don't.
 3 Q. Do you recall anything about this
 4 deal? It look likes it must be the --
 5 A. That is the one --
 6 Q. Irma Roberts?
 7 A. That is a --
 8 Q. No, I don't know if that is Atlantida
 9 or if it's Roberts, Walter --.
 10 A. You are an attorney, you can tell from
 11 these documents. I can't much less say anything
 12 about this.
 13 Q. My only hope is you have a memory of
 14 the deal. You don't remember?
 15 A. No.
 16 Q. Let's see.
 17 A. I think those were pieces of land that
 18 were sold in agreement for deed and they were
 19 recorded, something.
 20 Q. Now we see some quitclaim deeds dated
 21 5/24/79, for the Acosta Construction Company
 22 Corporation. Do you recall what that would have
 23 been?
 24 A. Yes, that was a lot that I sold
 25 Mr. Acosta next to H & J Paving.)

1 syndicated --
 2 Q. You don't recall who was in the
 3 syndication?
 4 A. No.
 5 Q. Do you recall how large the
 6 syndication was?
 7 A. I think Dr. Duccassi was there, he was
 8 in that group, three or four there.
 9 Q. But you don't recall any others at the
 10 time?
 11 A. I don't.
 12 Q. Let's take the one dated, quitclaim
 13 deed dated 3/18/89?
 14 A. Those names here, how do you conclude
 15 that I have anything to do with this here?
 16 Q. I am sorry, you don't. And I don't
 17 conclude that. I am sorry.
 18 A. You are putting me through a lot of
 19 names here that I never recognize. You should
 20 ask me about where my name is, all these names
 21 here. I don't have anything to do with these
 22 names here. Same thing with this here, the
 23 Merchant Bank is fine, because my name is here.
 24 There are many other names here which I don't
 25 have anything to do with.

1 BY MR. OVELMEN:
 2 Q. February 20, right? Okay.
 3 A. On this, let's go back to --
 4 MR. SCHWIEP: What page?
 5 THE WITNESS: On this page, this page
 6 here.
 7 MR. SCHWIEP: '90.
 8 THE WITNESS: You got there Jaime Mas
 9 who I don't know who is, Jaime, Jaime.
 10 BY MR. OVELMEN:
 11 Q. Right, none of those are yours and
 12 Javier --
 13 A. Then you got a Javier, then you got
 14 Javier, Javier, then you got Jorge, which have
 15 nothing to do with me. Jorge, Jorge, Jorge,
 16 Jorge, then you got Jorge Elder, that's me here,
 17 then you got another Jorge.
 18 Q. Is the one Jorge, Jr.?
 19 A. No, Jorge, Jr. was too little at that
 20 time to own anything.
 21 Q. It was 1991.
 22 A. What year was, '89?
 23 Q. '91.
 24 A. '89, '89, probably he had some.
 25 MR. SCHWIEP: Elsa?

1 Q. I think it is just that group right
 2 there. You don't recall the rest --
 3 A. For example, you asked me about
 4 Richard Tejera, where does this document said
 5 that I have anything to do with Richard Tejera or
 6 Rahal? I've never heard those names, Rifas; then
 7 you got a lot of names here, those are people who
 8 have provided probably quitclaim deed, judgment
 9 owner, my name is not here no place.
 10 Q. That Tejera is a reference to a Jorge
 11 Mas transaction.
 12 A. Where is mentioned?
 13 Q. Right to the left of it.
 14 A. Okay.
 15 Q. I understand.
 16 Moving then down page, this is page --
 17 MR. OVELMEN: What page?
 18 THE WITNESS: For example, you have
 19 some here --
 20 MR. SCHWIEP: First page of the
 21 February 20, first page.
 22 THE WITNESS: Look here, let me give
 23 you, so you get this record straight here,
 24 get the record straight here on this page
 25 here.

1 A. At that time, I think you have to ask
 2 him.
 3 Q. Is Elsa, your wife?
 4 MR. SCHWIEP: His wife.
 5 THE WITNESS: No.
 6 BY MR. OVELMEN:
 7 Q. Is it Jorge's wife, Junior's wife?
 8 A. No, Elsa, no, is the name of his wife,
 9 so this is not Junior either. This is another
 10 Jorge Mas.
 11 Q. Okay.
 12 A. So Jorge Aleman doesn't -- yes.
 13 Q. So the next one would be yours, would
 14 be Sparco Corp., some deal with Sparco?
 15 A. Yes.
 16 Q. That would be the warranty deed in
 17 '85?
 18 A. That was a warehouse that I bought,
 19 yes.
 20 Q. Do you recall whether you bought that
 21 by yourself or in a group?
 22 A. No, we bought that in a group.
 23 Q. Who would have been in that group?
 24 A. The same one that are there, the
 25 Marino and Israel Marmol. And I bought that from

1 Interamerican Investors and Developers, a
 2 corporation that was mentioned before.
 3 Q. And you owned Interamerican also,
 4 right?
 5 A. Yes, I own a piece of that, yes.
 6 Q. So you owned a piece of that and you
 7 sold it?
 8 A. To Sparco, and we bought a piece of
 9 that because we developed, we developed a
 10 warehouse under the name of Sparco.
 11 Q. Do you recall what that sold for?
 12 A. No. It was, you know, I don't know
 13 what, in the hundred of thousand dollars, 200,
 14 \$300,000. It was a warehouse on 35th Terrace.
 15 Q. And this warranty deed involving
 16 Interamerican Investment and Development, is that
 17 the same transaction --
 18 A. Yes, we bought it, same transaction we
 19 bought from them and the Barnett Bank here --
 20 Q. That is an assignment.
 21 A. I think that was --
 22 Q. What was that transaction?
 23 A. We got a mortgage from Barnett Bank on
 24 that property. It was -- okay.
 25 Q. Let's see, this first one with you and

1 A. Duccassi and myself.
 2 Q. And the instrument dated 8/28/85 is a
 3 warranty deed apparently?
 4 A. That was the house on Leafy Way.
 5 Q. House on Leafy Way, you say?
 6 A. House on Leafy Way.
 7 Q. And above that Church & Tower of
 8 Florida, Inc. was a warranty deed, do you recall
 9 what that was?
 10 A. Yes, that was the lot that we bought
 11 from Julia Wisnesky, the lot where Church & Tower
 12 was located.
 13 Q. And you purchased that from --
 14 A. Julia Wisnesky.
 15 Q. What was the purchase price on that
 16 one?
 17 A. I think that was around \$10,000.
 18 Q. These transactions that led to a
 19 warranty deed 12/18/86, filed 1/12/87, again
 20 looks like Irma S., was that your wife?
 21 A. Yes.
 22 Q. And Church & Tower, is that another
 23 lot?
 24 A. Yes, that was other lots that I bought
 25 around there.

1 Mr. Carlos?
 2 A. There is not a description here.
 3 Q. There is assignment of a mortgage?
 4 A. There is not a description here so I
 5 cannot tell you.
 6 Q. So you don't know what that would have
 7 been?
 8 A. If I had a better description.
 9 Q. It was a transaction dated 12/23/85,
 10 assigning a mortgage.
 11 A. But I don't have a description here, I
 12 cannot tell you.
 13 See Irma, that is an apartment
 14 building that I bought also.
 15 Q. Do you remember how much that cost?
 16 A. That is a mortgage.
 17 Q. That is a mortgage?
 18 A. We bought that with a small down
 19 payment, 20, \$30,000.
 20 Q. Again who was in that transaction?
 21 A. There was I think Dr. Duccassi was
 22 there.
 23 Q. Anyone else?
 24 A. No.
 25 Q. Just the two of you?

1 Q. So you bought all these from Church &
 2 Tower?
 3 A. No. Church & Tower bought this.
 4 Q. And from you?
 5 A. From me and I think another one from
 6 Wisnesky. I sold, I think I sold -- no, I didn't
 7 sell. I think that I sold two lots there. I
 8 bought around four, five lots around and I sold a
 9 couple of things.
 10 I don't recall that. That's the
 11 transaction selling lots to Church & Tower around
 12 that area.
 13 Q. Who would have been the attorney on
 14 those purchase and sales?
 15 A. I don't know if it was Eliot Abbott or
 16 Tom Carlos.
 17 Q. One of those two?
 18 A. Yes.
 19 Q. What do you recall the aggregate
 20 amount of those sales being?
 21 A. I don't know, 20,000, 10,000, 15,000,
 22 in that neighborhood at that time.
 23 Q. The warranty deed dated 12/15/86,
 24 again seems to reference Interamerican Investment
 25 and Development, what do you recall about that

Page 1650

1 transaction?
 2 A. That was the piece of property that I
 3 bought on 35th Terrace.
 4 Q. And was that a residential piece?
 5 A. No, that was industrial.
 6 Q. Industrial?
 7 A. Piece of land.
 8 Q. Was that by yourself or was that in a
 9 group?
 10 A. That was by myself and my children.
 11 Q. And what was the purchase price of
 12 that?
 13 A. I bought that, I don't remember. It
 14 was around 2 or 3 dollars a foot and I think we
 15 bought a couple of acres there so it was around 2
 16 or \$300,000 I think.
 17 Q. And the funding for that was a
 18 personal --
 19 A. Yes.
 20 Q. Your income from Church & Tower?
 21 A. Yes, my income.
 22 Q. And there was no one else involved
 23 other than family in that purchase?
 24 A. Right.
 25 Q. And the attorney would have been

Page 1651

1 Carlos or Abbott?
 2 A. One of those two.
 3 Q. The mortgage?
 4 A. It was a property, mortgage on that
 5 property.
 6 Q. The mortgage dated 4/28/89, do you
 7 recall what that would have been?
 8 A. Yes, it is a mortgage on the property
 9 that we bought, that we bought the Interamerican
 10 Investment and Development, we bought.
 11 Q. So you bought that in '86 and then put
 12 a mortgage on it?
 13 A. Yes.
 14 Q. In '89?
 15 A. Yes.
 16 Q. And then the next mortgage which is
 17 7/4, do you recall, that's an interesting one,
 18 the instrument was 6/7/74 but it is not filed
 19 until 1/22/90. Do you recall what that is?
 20 A. What is it? No. That was a mortgage
 21 with Barnett Bank, a mortgage we put on that
 22 property.
 23 Q. I know, but the instrument is dated
 24 6/7/74.
 25 A. Because probably this was a

Page 1652

1 construction loan that it became a primary
 2 mortgage sometime later.
 3 Q. You think that's what --
 4 A. Perhaps.
 5 Q. 16 years is a long time.
 6 A. You know, but the most probable thing
 7 was it was a construction loan and then it turns
 8 into a long term mortgage once the construction
 9 was finished.
 10 Q. All right, sir.
 11 Let's see, do you recall what this
 12 affidavit would have been, 2/26/87?
 13 A. No, no, I don't.
 14 Q. The next entry involves Four M
 15 Investment joint venture, do you recall that?
 16 A. Yes.
 17 Q. What is that?
 18 A. A warehouse that we built together,
 19 Marino, Marmol, the family trust and myself, by
 20 the same percentage that was in some document
 21 there, 30, 30, 20 and 20.
 22 Q. What was is the size of that
 23 transaction?
 24 A. We build a building that was worth
 25 around a million dollars. We did that with a

Page 1653

1 mortgage from the Republic National Bank,
 2 construction loan and then turned into a
 3 mortgage.
 4 Q. Okay, sir.
 5 Now, the next, this affidavit, the
 6 next affidavit, do you recall what that would
 7 have been?
 8 A. No, no, I don't. Probably something
 9 related to the banks and the loans.
 10 Q. Now we have a couple of warranty deeds
 11 dated 4/6/88, and Florida Power & Light is
 12 referenced. Do you recall what that is?
 13 A. Yes, that was an easement that we
 14 bought from Florida Power & Light in the
 15 warehouse that Dr. Duccassi, Tom Carlos and I
 16 owned.
 17 Q. And how much was the easement?
 18 A. I don't know, I don't remember.
 19 Q. Not much, though? Was it nominal?
 20 A. I don't remember.
 21 Q. How about the warehouse, do you
 22 remember what that cost?
 23 A. That was the one that had the mortgage
 24 from Liberty, Liberty Mutual. I don't remember
 25 the numbers.

1 Q. All right, sir.
 2 The mortgage dated 4/28/89, was I
 3 guess Barnett Bank, do you recall what that would
 4 be?
 5 A. The same mortgage that is on the top,
 6 4/20/89.
 7 Q. It is the same transaction?
 8 A. 4/20/89, the same thing here.
 9 Q. Okay.
 10 A. Atlantida, same thing in Homestead,
 11 that piece of land that I bought from Huff and
 12 sold in pieces.
 13 Q. This is more of that same, all these
 14 partial releases of mortgage?
 15 A. Right.
 16 Q. Down to, say, this final statement?
 17 A. All the others are not mine.
 18 Q. So those, okay.
 19 MR. OVELMEN: Could you mark that as
 20 our next exhibit, please
 21 (Defendants' Exhibit 15 was marked for
 22 identification.) *important*
 23 (Pause.)
 24 BY MR. OVELMEN:
 25 Q. All right, sir, are you ready?

1 any biases that you are aware of?
 2 A. I don't know, sir, because I don't
 3 know these people.
 4 Q. Okay.
 5 A. So I cannot have an opinion on that.
 6 Q. Same with respect to Susan Epstein and
 7 Mark Sullivan, as far as you know --
 8 A. I don't know them.
 9 MR. CANTERO: Is he related to Andrew
 10 Sullivan?
 11 MR. OVELMEN: I don't think so, an
 12 unlikely thing.
 13 BY MR. OVELMEN:
 14 Q. Could you turn to CRS-6?
 15 A. CRS?
 16 Q. CRS-6.
 17 A. Okay.
 18 Q. The first paragraph under
 19 Congressional Concerns, the paragraph reads,
 20 "Over the years members of Congress have debated
 21 the merits of the United States broadcasting to
 22 Cuba. Congressional concerns about Radio and TV
 23 Marti have included the following:
 24 Politicization of the Advisory Board for Cuba
 25 Broadcasting; meeting VOA broadcast standards;

1 A. Yes.
 2 Q. Have you seen this report before? Do
 3 you recognize it?
 4 A. I am trying to remember. Let's see if
 5 I...
 6 I don't remember reading this report,
 7 no. There have been so many reports on Cuba that
 8 I don't...
 9 Q. All right, sir, for the record do you
 10 see that it purports to be a Congressional
 11 Research Service report done by a Susan Epstein
 12 and a Mark Sullivan titled, Radio and Television
 13 Broadcasting to Cuba: Background and Current
 14 Issues, dated August 5, 1994.
 15 Do you know who Susan Epstein is or
 16 Mark Sullivan?
 17 A. No, I don't.
 18 Q. Are you familiar with Congressional
 19 Research Service?
 20 A. Is that an arm of the Congress? I
 21 don't know. Congressional Research Service,
 22 maybe -- I think this is a, is this part of the
 23 United States Congress? I am not sure.
 24 Q. I think it is.
 25 Do you have any feelings that CRS has

1 and audience size and accessibility of TV Marti
 2 broadcasts to Cubans."
 3 Is that a true statement?
 4 A. Yes, with the exception that instead
 5 of over the years members, I would say over the
 6 years some members of Congress, but Radio and TV
 7 Marti does not have the attention of a
 8 substantial number of members of Congress.
 9 Q. But the general thrust that there has
 10 been a controversy over those three issues is
 11 accurate, politicization, broadcast standards and
 12 accessibility of TV Marti to Cubans, those have
 13 been issues that have been discussed?
 14 A. By themselves alone, not, but as part
 15 of many other issues regarding Cuba, yes, there
 16 have been some concern about that.
 17 Q. Have you played a role in the
 18 discussion of those issues?
 19 A. Of?
 20 Q. Have you played a role in the
 21 discussion of those issues?
 22 A. Those issues, what issues?
 23 Q. Politicization of the advisory board,
 24 VOA broadcasting standards issued and
 25 accessibility of TV Marti.

Page 1658

1 A. No, I don't.

2 Q. You haven't opined on any of those

3 issues?

4 A. No.

5 Q. You haven't given testimony about

6 them?

7 A. No.

8 Q. Okay, sir.

9 A. I handle all the matter relating to

10 Radio Marti on the advisory board. We don't

11 discuss politicization because there is no

12 politicization on the board of Radio Marti. The

13 broadcast standards are pretty well kept and the

14 audience size and accessibility of Radio Marti

15 broadcasts to Cubans, we all recognize that it is

16 small, it is not a secret to anyone.

17 Q. So you don't recall giving testimony,

18 for example, on the accessibility of TV Marti

19 broadcasts to Cubans?

20 A. Yes, I have. But this is not my job.

21 I don't do that regularly. I don't take most of

22 my time in doing that. I have testified in

23 several occasions about Radio and TV Marti.

24 Q. And amongst the issues you have

25 testified about has included those issues, is

Page 1659

1 that true?

2 A. No, the politicization, no, sir;

3 broadcast standards, no, sir; audience size and

4 accessibility of TV Marti, yes, sir.

5 Q. So you don't recall testifying about

6 politicization?

7 A. I don't recall, no, I am telling you I

8 have not testified about the politicization, for

9 the Advisory Board for Cuba Broadcasting, I have

10 not testified about that in Congress, I have not

11 testified about broadcast standards. Those

12 issues have never come up before me in any

13 testimony before Congress.

14 Yes, the audience size and

15 accessibility to TV Marti, yes, that I have

16 discussed.

17 Q. Now, under the heading Politicization,

18 the report states: "Concerns about

19 politicization at Radio and TV Marti have

20 centered around the role of the Advisory Board

21 for Cuba Broadcasting and its controversial

22 chairman, Jorge Mas Canosa."

23 Do you agree with that sentence?

24 A. Specifically we could say that, yes,

25 some of that concerns have centered on the

Page 1660

1 advisory board, but more on a more larger scale

2 on the whole Cuban American community.

3 Q. "Many are concerned about the lack of

4 turnover of the board members and the chairman,

5 as was intended by the originating legislation,"

6 the report says.

7 Do you agree with that?

8 A. No, I disagree.

9 Q. Has --

10 A. I should substitute the word many by

11 probably few.

12 Q. Few?

13 A. Yes.

14 Q. Has there been a lack of turnover of

15 the board members?

16 A. Well, it depends with what other board

17 you compare that. What is the table to compare

18 that?

19 Q. Have you been the chairman since the

20 inception?

21 A. Yes, sir, I have been.

22 Q. And when was that?

23 A. That was in 1985.

24 Q. 19 when?

25 A. '85.

Page 1661

1 Q. '85.

2 I notice a chart on the next page says

3 that you were confirmed by the Senate on August

4 8, 1984. Does that mean --

5 A. '84, then we went back to '84. I was

6 talking from memory. Even probably go further

7 back, is '83 probably because it was confirmed in

8 '84, probably was appointed sometime in '83.

9 Are you referring to confirmation?

10 Q. Yes, I am just --

11 A. In '84, is that Senate confirmation?

12 Q. That's correct.

13 A. If it is Senate confirmation then

14 it is '84, '83 because I was appointed to a board

15 that did not require Senate confirmation earlier

16 in the Reagan administration because it was a

17 board just to study the feasibility of the radio

18 station to Cuba.

19 That didn't require confirmation, that

20 was earlier. If we got something requiring

21 confirmation in '84 then the appointment dates

22 back to '84, '83.

23 Q. So you have been the only chairman

24 then, is that correct?

25 A. Yes, sir, I have.

1 Q. And it has been 12 or 13 years, is
2 that correct?
3 A. Yes.
4 Q. Can you explain your understanding of
5 why you have been the only chairman?
6 A. Yes. I think that the fact, number
7 one, that we were the one who developed the
8 concept of a free radio broadcasting to Cuba to
9 break the monopoly that Castro holds on news and
10 information, and the fact that we lobbied in the
11 United States Congress and the various
12 administrations since then to keep Radio and TV
13 Marti on the air.
14 And also year after year there is a
15 fight to try to, from a handful, less than a
16 handful of Congressmen to strip Radio and TV
17 Marti of funds, and I go once a year up to
18 Washington to reassure that Radio Marti survive
19 and is kept as a viable option to the Cuban
20 people. And for that reason representing the
21 interests of Radio Marti as a chairman, I have
22 been, I think, responsible for keeping Radio and
23 TV Marti on the air.
24 Q. Now, originally these were to be,
25 what, three year terms, is that correct?

1 composition of the board."
2 A. Where is that?
3 Q. Same paragraph.
4 "They say that the conservative Mas
5 Canosa has attempted to use his influence to gain
6 control of the radio station so that it could be
7 used to propagate the views of the Cuban American
8 National Foundation, a Cuban exile organization
9 founded by Mas Canosa in 1981. Some have argued
10 further that Mas Canosa is using his position to
11 promote himself as the next Cuban leader after
12 Castro."
13 Are you familiar with those claims?
14 A. Yes, sir.
15 Q. Now, it is true, is it not, that you
16 are both chairman of CANF, which is a political
17 exile group, and chairman of this board, is that
18 correct?
19 A. No, that is not correct.
20 Q. What is your position on the board?
21 A. You just, can you go back and ask that
22 question again, go back and read that question.
23 (Record read.)
24 A. No, it is not a political group, I am
25 sorry, it is not a political group, so I disagree

1 A. Three years or one year.
2 Q. Or is it one year?
3 A. Yes. But most people who have served
4 there have served for longer terms.
5 Q. All right. But you haven't been
6 like -- as I understand it, you haven't been
7 reappointed; what has happened exactly?
8 A. I was appointed, confirmed two or
9 three times by the Senate and I have been kept in
10 the position since then.
11 Q. How does that happen? I mean,
12 technically how does that happen?
13 A. As things happen. I mean, you are
14 appointed to a position and you are left there,
15 you are not --
16 Q. No one appoints someone else?
17 A. Right, that's it, that's how it
18 happened.
19 Q. There isn't any act that reappoints,
20 it is just a status quo, is that correct?
21 A. Yes, sir.
22 Q. Now, the report then goes on to say,
23 "Some critics claim that the lack of turnover is
24 due to a lack of willingness on the part of past
25 and current administrations to change the

1 with you. CANF is not a political group so you
2 qualify your questions and you make implications
3 in your question that is not appropriate so the
4 premise is wrong.
5 Q. This is a subtlety I can only aspire
6 to, I assure you. It is a nuance that is well
7 beyond my capacity at this time of the day.
8 A. But I have to keep myself alert
9 because then you create the notion and you are
10 creating the concept and developing the
11 perception that this is a political organization
12 and the Cuban American National Foundation is
13 not, underlined, is not a political
14 organization.
15 Q. I understand your objection. Now, is
16 it true that you are both chairman of CANF and
17 chairman of this board?
18 A. Yes, that's correct.
19 Q. And what is the purpose then of CANF
20 if it is not political?
21 A. The purpose of CANF is to enlighten
22 the public opinion about issues of concern to the
23 Cuban people inside the island and abroad.
24 Q. Right. So its purpose is a
25 communicative purpose then, correct?

Page 1666

1 A. To communicate and to propagate facts
2 concerning the Cuban issue in the United States.

3 Q. What is the function, what are the
4 duties and responsibilities of being chairman of
5 this board?

6 A. Chairman of this board is to set the
7 policy together with the board of directors, the
8 board of directors of the Cuban American National
9 Foundation, which I head that board, sets the
10 policy for the Cuban American National
11 Foundation.

12 Q. No, my question is as the chairman of
13 the board of --

14 MR. CANTERO: The advisory board.

15 Q. -- advisory board for radio, for Cuba
16 Broadcasting?

17 A. Is to advise the president of the
18 United States and the director of United States
19 information agency on matters relating to Cuba
20 Broadcasting.

21 Q. Can you see then why many people have
22 suggested or some, let's use the word some, some
23 people have suggested that there may be a
24 conflict of interest between both being the
25 chairman of CANF and the chairman of the advisory

Page 1667

1 board?

2 A. Yes, but those same people did not see
3 the conflict when for the effort of the
4 publications of the Cuban American National
5 Foundation Radio Marti became a viable project.
6 Without the Cuban American National Foundation
7 Radio Marti would have never existed.

8 MR. CANTERO: I also object to the
9 question that it assumes just because
10 somebody has a position on Cuba is thereby,
11 he thereby has a conflict of interest in
12 serving on the Advisory Board for Cuba
13 Broadcasting.

14 MR. OVELMEN: It doesn't assume the
15 question. That was the question I was
16 asking.

17 MR. CANTERO: You said, don't you see
18 why some would think.

19 MR. OVELMEN: I said can you see, that
20 was my question, was could you see that, I
21 wasn't assuming that, I was asking.

22 BY MR. OVELMEN:

23 Q. But in any event, if I understand your
24 answer, your answer is that you don't feel there
25 was a conflict, there shouldn't be regarded to be

Page 1668

1 a conflict now because CANF was instrumental in
2 the creation and the birth of Radio Marti, is
3 that correct?

4 A. Since the inception of the Cuban
5 American National Foundation we constantly
6 publish a lot of papers, booklets regarding the
7 need of establishing a source of free information
8 to the Cuban people.

9 So the foundation in itself is in
10 great part responsible for the creation of Radio
11 Marti, at least creating the circumstances that
12 led to the creation of Radio Marti.

13 Q. Now, what are your duties as chairman
14 of the advisory board of, for Cuba broadcasting?

15 A. What is your question?

16 Q. I am sorry, what are your duties --

17 A. I already told you, I answered that
18 question. You can go back.

19 Q. Well, all right.

20 A. You need some water, I know you are
21 tired.

22 MS. BARDACH: Let's take a five minute
23 break.

24 MR. SCHWIEP: His lunch is sitting
25 here.

Page 1669

1 MS. BARDACH: Let's take five minutes.
2 THE WITNESS: Take five minutes.
3 (Recess.)
4 THE WITNESS: So you have to ask a lot
5 of questions.
6 MR. OVELMEN: All right.
7 MR. OVELMEN: Ready?
8 THE VIDEOGRAPHER: Yes, sir.
9 BY MR. OVELMEN:
10 Q. Mr. Mas, do you remember that back in
11 1966 there was a raid?
12 A. This got nothing do with this?
13 Q. No, we will come back to it.
14 MR. CANTERO: Are you finished with
15 that?
16 MR. OVELMEN: That requires too much
17 focusing.
18 THE WITNESS: That's Bardach's
19 questions.
20 BY MR. OVELMEN:
21 Q. You remember a mission to kill Castro
22 in 1966 involving Herminio Diaz and Tony Cuesta?
23 A. Yes. I don't know if the mission was
24 to kill Castro or not but I remember that
25 mission, yes, sir.

1 Q. You remember the raid?
 2 A. Yes.
 3 Q. Did you pay for it, did you finance
 4 the raid?
 5 A. No, I did not.
 6 Q. Did you have anything to do with
 7 providing some kind of support for the raid?
 8 A. The organization that I belonged to,
 9 RECE, support that operation, yes.
 10 Q. RECE supported and you were a member.
 11 Did you have anything to do with, with
 12 actually participating in the raid?
 13 A. No, sir, I did not.
 14 Q. Did you go in a boat waiting for
 15 Cuesta to return?
 16 A. No, sir.
 17 Q. Did you spend a couple of days at
 18 Seven Mile Bridge waiting for Cuesta's return?
 19 A. No, sir.
 20 Q. Did you have a boat that was used in
 21 these raids from time to time at your home?
 22 A. No, sir. I did not.
 23 Q. Did you have difficulty disposing of
 24 the boat?
 25 A. No, sir.

1 Q. Did you provide financial support to
 2 RECE?
 3 A. No, sir, I did not have money at that
 4 time. I was a very poor man.
 5 Q. Is it true that Tony Cuesta received a
 6 check every Friday at Church & Tower's office
 7 that was made out by Equipment and Personnel
 8 Services and paid to his uncle and that this went
 9 on for several years?
 10 A. His uncle used to work for my
 11 subcontractor there. I think that it was
 12 Equipment and Personnel and then later on
 13 Communication Contractors, Inc., painting the
 14 tractor. He worked for several years there. And
 15 he was a good worker.
 16 Q. Isn't it true, though, that the
 17 payments were really to go to Tony Cuesta?
 18 A. No, sir, it was not, it was for him.
 19 He was a hardworking man.
 20 Q. Is your mother ill with Alzheimer's
 21 disease?
 22 A. Yes, she is.
 23 Q. How long has she been ill with that
 24 disease?
 25 A. For several years now.

1 Q. After the raid?
 2 A. No, sir, I did not. I did not have
 3 any boat.
 4 Q. When you returned, you deny that you
 5 returned from the Seven Mile Bridge?
 6 A. I could not return because I was never
 7 there.
 8 Q. Because you were never there?
 9 A. I already answered that question.
 10 Q. You didn't see your brother and talk
 11 to him about all of this?
 12 MR. CANTERO: Objection.
 13 THE WITNESS: I could not return
 14 because I was not there. I already answered
 15 that question.
 16 BY MR. OVELMEN:
 17 Q. Okay.
 18 Did you ever maintain any boat for
 19 RECE for raids that were conducted in Cuba?
 20 A. RECE had a boat but I never used that
 21 boat. That boat was never under my control in
 22 RECE.
 23 Q. But did you provide -- you were a
 24 member of RECE, right?
 25 A. I was a member of RECE, yes.

1 Q. And she can't remember anything --
 2 A. She doesn't recognize anyone.
 3 Q. How long has that been?
 4 A. For several years.
 5 Q. And so she can't read the paper or
 6 recognize what is in the newspaper?
 7 A. That's correct.
 8 Q. Why do you want to start another
 9 newspaper in Miami?
 10 MR. CANTERO: Objection, assumes facts
 11 not in evidence.
 12 THE WITNESS: I don't know what this
 13 has to do with the lawsuit but that's a
 14 decision that I will make in due time.
 15 BY MR. OVELMEN:
 16 Q. Are you considering doing that right
 17 now?
 18 A. Yes, I am.
 19 Q. Why is that?
 20 A. Because it is part of my free will and
 21 my vocation to write and to speak. That's the
 22 reason why I am in part responsible for the
 23 creation of Radio Marti.
 24 Q. Is it in part related to your
 25 dissatisfaction with the Miami Herald's coverage

1 of events?
 2 A. Not necessarily.
 3 Q. Is that part of it, though?
 4 A. No, not necessarily.
 5 Q. Are you dissatisfied with the Herald?
 6 A. In certain aspects, yes, most of them,
 7 yes.
 8 Q. In what regard -- in most of them?
 9 A. Most of them regarding Cuba, regarding
 10 most of its coverage on Cuba.
 11 Q. What is the nature of that
 12 dissatisfaction?
 13 A. I don't think that they are accurate.
 14 Q. You think they make factual errors?
 15 A. In many occasions, yes.
 16 Q. Do you believe that they are biased?
 17 A. Yes, regarding Cuba, yes, they are.
 18 Q. What kind of factual errors do they
 19 make?
 20 A. When they talk about health, tourism,
 21 medicine, education in Cuba, I think that --
 22 Q. Factually --
 23 A. They are not factual, yes.
 24 Q. And as far as bias is concerned what
 25 are your objections to the Herald?

1 Q. What its opinions were?
 2 A. I did not testify to that.
 3 Q. You don't recall testifying to that?
 4 A. I didn't testify to that.
 5 Q. All right, sir.
 6 Do you recall making a speech on the
 7 radio a couple of weeks ago in which you stated
 8 that you were grievously upset because of the
 9 Miami Herald's publication of Ricardo Mas'
 10 deposition because you felt it needlessly upset
 11 your mother?
 12 A. Yes.
 13 Q. Could you explain if your mother has
 14 Alzheimer's exactly how she was upset?
 15 A. Because she has some moments in which
 16 she understands, a few moments that she recognize
 17 people, that she can relate to certain things.
 18 Most of the time she doesn't, she has Alzheimer's
 19 disease and she doesn't recognize people but
 20 sometimes she is very clear, sometimes she wakes
 21 up in the morning and for some time she
 22 recognizes people and she understands a few
 23 things.
 24 Q. And did she have one of these episodes
 25 of lucidity at a time when the Herald article

1 A. I think they are biased against the
 2 community. That's why they so strongly opposed
 3 the Torricelli bill and then later on the
 4 Helms-Burton bill.
 5 Q. So you object to their opposition to
 6 those pieces of legislation?
 7 A. Yes, I think that the paper should
 8 reflect the opinions of the community in which it
 9 is published and certainly they do not reflect
 10 the opinion of the Cuban American community.
 11 Q. How do you know that they don't
 12 reflect the --
 13 A. That's my perception. I might be
 14 wrong, but that is my perception, my own
 15 perception.
 16 Q. So you have a sense of the Cuban
 17 American community and what its opinions might
 18 be?
 19 A. Yes, different from that of the Miami
 20 Herald, yes, sir.
 21 Q. Do you recall testifying earlier in
 22 this deposition that you didn't know what the
 23 Cuban American community meant, what the term
 24 meant, and that you didn't know what its --
 25 A. What?

1 was --
 2 A. When she is surrounded by people,
 3 reading papers and know what's going on.
 4 Q. Did she indicate that to you in some
 5 way?
 6 A. No, I haven't talked to her since.
 7 Q. So you don't, you don't know whether
 8 this happened or do you know by secondhand
 9 information?
 10 A. I went to see her on Mother's Day and
 11 of course we didn't talk about the story on
 12 mothers day.
 13 Q. Then how is it you know she was upset
 14 by this?
 15 A. My mother, I didn't say that she was
 16 upset, what I said, that I was upset for the
 17 Miami Herald publishing a story --
 18 Q. I see.
 19 A. -- on the struggle of two brothers on
 20 Mother's Day.
 21 Q. I see. In other words, she may not
 22 have been upset but you were upset that she might
 23 be upset?
 24 A. Yes.
 25 Q. Thank you.

1. You are welcome.

2 MR. CANTERO: Rick, eat something.

3 THE WITNESS: Let him ask the questions
4 or her, she is writing the questions anyway.

5 MR. OVELMEN: Would you mind if he
6 asked a few questions?

7 MR. CANTERO: Yes.

8 MR. OVELMEN: Is that all right?

9 MR. CANTERO: No, I mind.

10 MR. OVELMEN: You do mind?

11 MR. CANTERO: Yes.

12 MR. OVELMEN: All right, then I will
13 keep asking them.

14 BY MR. OVELMEN:

15 Q. Did you ever meet --

16 MR. SCHWIEP: I ask fine questions.
17 What's that about?

18 MR. CANTERO: No, it's just that you
19 have had your chance, now Rick.

20 MR. SCHWIEP: How about if I ask some
21 of his questions for him?

22 BY MR. OVELMEN:

23 Q. Did you ever meet with Oliver North at
24 the Omni Hotel in the early 1980s?

25 A. Never.

1 A. Yes.

2 Q. At that time Inez was your secretary,
3 was she not?

4 A. Yes.

5 Q. And is that your number?

6 A. Yes.

7 Q. What was the purpose of Oliver North
8 having your, why would he have your number and
9 why would he have a message to call you?

10 MR. CANTERO: Objection, calls for
11 speculation.

12 BY MR. OVELMEN:

13 Q. Do you know?

14 A. Let me say this here. I already
15 answered this question and I am more than glad to
16 answer that question again.

17 You have to ask Ollie North. I don't
18 know why my name was here and I am not sure, if
19 this came from Ollie North notebook or desk, I
20 don't know. You said that this is the copy of
21 someplace and somewhere.

22 Q. I think if you look at the top it is
23 reproduced at the National Archives which is the
24 storage --

25 A. The National Archives has a lot of

1 Q. Have you had any relationships with
2 Oliver North?

3 A. No, sir, none.

4 Q. All right, sir, just do this while we
5 are on it.

6 MR. OVELMEN: Could you mark this
7 please as the next Defendants' exhibit.

8 And I have one for you, Mr. Mas.

9 (Defendants' Exhibit 158 was marked for
10 identification.)

11 BY MR. OVELMEN:

12 Q. Mr. Mas, would you please look at
13 D 11292?

14 A. 11?

15 Q. D 11292?

16 MR. OVELMEN: For the record, this
17 exhibit is reproductions, verbatim
18 reproductions provided by the Library of
19 Congress National Archives of the Oliver
20 North notebooks.

21 BY MR. OVELMEN:

22 Q. Do you see the entry at the top of the
23 page, it says, call Jorge Mas, and then there is
24 a number, 305-233, and I think that is a 6540,
25 and then in parentheses underneath is Inez?

1 documents. I would like to see a certification
2 that this is a true copy or show the original.

3 I don't know if this is the case, if
4 this is an original or is true that Ollie North
5 wrote this, I don't know why my name ended up
6 there.

7 Q. I will represent for the record this
8 is a true copy provided by the National
9 Archives.

10 A. Then I take your word and if that, if
11 you represent that this is the notebook of Ollie
12 North, I don't know why my name was there. I
13 never talked to him on the phone. Nobody called
14 me from his office. Inez never talked to Ollie
15 North so I don't know why his name is there.

16 MR. CANTERO: Rick, is your
17 representation that this exhibit is the
18 entire notebook or a portion?

19 MR. OVELMEN: No, it is a portion. It
20 is a portion.

21 BY MR. OVELMEN:

22 Q. Have you ever had a conversation with
23 Oliver North either -- first have you ever had a
24 conversation with Oliver North?

25 A. I met him once I think in the whole --

Page 1682

1 it was the White House or the Executive Office
2 Building, I don't know. And I was introduced,
3 say hello and just keep walking. That was my
4 whole relationship with Ollie North. I already
5 covered that with this deposition that we went
6 over and over.

7 Q. You only had the one conversation, but
8 I am trying on see if we can refresh your
9 recollection with these entries.

10 I understand you have testified at
11 times about these matters.

12 A. Yes.

13 MR. CANTERO: Just because his name is
14 on the entry doesn't mean that --

15 THE WITNESS: Right, to rehash all that
16 again.

17 BY MR. OVELMEN:

18 Q. Now, have you ever had correspondence
19 with Oliver North?

20 A. No, sir.

21 Q. So is it your testimony then you have
22 had that one conversation briefly, that's the
23 only time --

24 A. Yes, yes, sir.

25 Q. Now, on D 11293, which is the next

Page 1683

1 page, the top, there is another entry, it says
2 Felix Rodriguez, then it says expedite 50 K for
3 IR and then something for Jorge Mas or per Jorge
4 Mas something. Do you know what that could be
5 about?

6 A. If you don't understand that, I don't
7 either. I have the same idea about you, what is
8 it.

9 Q. Did you provide \$50,000 at any time
10 for any project relating to Oliver North?

11 A. Neither 50,000 nor \$5 nor five cents.

12 Q. Okay.

13 So you have no idea what this could be
14 referring to?

15 A. No, sir, I don't.

16 And you already asked me that in the
17 previous deposition. You asked this a thousand
18 times and you get the same answer a thousand
19 times.

20 Q. We have the notebooks now, we are
21 trying to ask whether these at all help you.

22 A. The notebook is not going to change my
23 testimony.

24 Q. Look at D 11295, the entry, Felix
25 Rodriguez, and then beneath that, still have not

Page 1684

1 gotten, and from Jorge Mas, and again. I would ask
2 does that -- have not gotten dollars from Jorge
3 Mas, sorry. Does that refresh your recollection?

4 A. No, sir.

5 Q. So you have no idea why he would be
6 writing entries that suggest that he is expecting
7 \$50,000 or some dollars from you?

8 A. You can subpoena him and ask him.

9 Q. Take a look at D 11301, again we have
10 your name, Jorge Mas, and then a number of
11 numbers, 305-667-2955, then 233-6540, then
12 265-2822 and something in parens, and then looks
13 like 666-1075 (home).

14 Are those numbers you recognize?

15 A. Yes, sir.

16 Q. Are those your home phone numbers and
17 office numbers?

18 A. I don't recognize one of them. The
19 others are my home number or were my home number,
20 not any more.

21 Q. Okay, sir.

22 And again this doesn't refresh your
23 recollection as all as to --

24 A. No, my testimony is still the same,
25 sir.

Page 1685

1 Q. Did you finance the release of
2 Mr. Posada from the Venezuelan jail?

3 A. No, sir, I don't have anything to do
4 whatsoever with the release of Mr. Posada or
5 escape of Mr. Posada from jail in Venezuela.

6 Q. You didn't send money to Panama and
7 then have it brought back --

8 A. Absolutely not.

9 Q. -- \$25,000 by Ricardo, \$25,000 by a
10 colleague so that 50,000 would be in cash?

11 A. Absolutely not.

12 Q. And finance --

13 A. Absolutely false.

14 Q. You didn't ever meet Oliver North at
15 the Omni Hotel?

16 A. No, sir.

17 MR. CANTERO: Objection, asked and
18 answered.

19 THE WITNESS: I already answered that.

20 BY MR. OVELMEN:

21 Q. Did you have a relationship with the
22 Chilean ambassador or attache here in Miami?

23 A. I met --

24 MR. CANTERO: Chilean ambassador in
25 Miami?

Page 1686

1 MR. OVELMEN: Or attache.
 2 THE WITNESS: Chilean consul in Miami,
 3 yes, I met a Chilean consul here as I met
 4 many consuls here in Miami.
 5 BY MR. OVELMEN:
 6 Q. Was he a colonel in the Chilean
 7 government?
 8 A. I don't remember. He was in the army
 9 but I don't remember if he was a colonel or not.
 10 I don't even remember his name.
 11 Q. What was the nature of your
 12 relationship with him?
 13 A. The same nature that I have the
 14 relationship with other consuls here, I attend
 15 social functions and receptions that are usually
 16 here in Miami.
 17 Q. You weren't involved in any kind of
 18 clandestine activities --
 19 MR. CANTERO: I object to the form.
 20 Q. -- with him?
 21 A. The answer to your question is
 22 absolutely not.
 23 Q. Do you recall praising Pinochet at any
 24 time?
 25 A. No.

Page 1687

1 Q. Were you aware that Alan Snyder, first
 2 of all, do you know who Alan Snyder is?
 3 A. No.
 4 Q. You don't remember him as a former
 5 director of worldwide television for the US
 6 Information Agency?
 7 A. No.
 8 Q. Mr. Snyder has written an article in
 9 which he says, "So it is with Radio Marti, the US
 10 government's broadcast service to Cuba and a
 11 political potboiler.
 12 "Several weeks before Fidel Castro's
 13 jet fighters shot down the planes of the Brothers
 14 to the Rescue Radio Marti was bragging a small
 15 plane had buzzed Havana and dropped anti-Castro
 16 leaflets. Castro was mocked for not
 17 retaliating. And a Cuban American was quoted
 18 that such flights to Havana would be made
 19 regularly."
 20 Did you see that article?
 21 A. No, I didn't.
 22 Q. Are you familiar with that quotation?
 23 A. No.
 24 Q. In these reports that you get about
 25 the content of Radio Marti, was there ever

Page 1688

1 discussed?
 2 A. I already answered that question. You
 3 asked that question before.
 4 Q. What I am asking now is in the reports
 5 that we discussed that you receive every couple
 6 of months was that ever discussed?
 7 A. That is just news among the thousands
 8 of news that are broadcast on Radio Marti. We
 9 don't get involved in those details.
 10 Q. You would think it would be a detail
 11 if Radio Marti had incited this action?
 12 A. Radio Marti does not incite anything.
 13 Q. I understand it is not supposed to. I
 14 guess that's the point.
 15 A. Radio Marti does not incite anything
 16 so I am not concerned about that.
 17 Q. So your view is that Mr. Snyder has
 18 got it all wrong then?
 19 A. I don't know, I haven't read the
 20 article.
 21 Q. The quotation I read to you, you think
 22 is incorrect?
 23 A. Is incorrect, yes.
 24 Q. Now, do you have any knowledge of this
 25 charge at all?

Page 1689

1 A. No, sir, none whatsoever. I don't
 2 handle those details I don't get involved in
 3 those details.
 4 Q. And again, your view would be this
 5 would be a detail?
 6 A. Yes.
 7 MR. CANTERO: I object to the form.
 8 MR. OVELMEN: Give me two minutes.
 9 THE VIDEOGRAPHER: Going off the
 10 record?
 11 MR. SCHWIEP: Yes, off the record.
 12 (Recess.)
 13 BY MR. OVELMEN:
 14 Q. Let us go back to the CRS report for
 15 Congress that we were dealing with before our
 16 interlude.
 17 A. Page number?
 18 Q. Page number CRS-6.
 19 A. CR 6?
 20 Q. CRS-6, page 6.
 21 A. Okay.
 22 Q. The second paragraph under
 23 Politicization --
 24 MR. CANTERO: That's a hard word.
 25 MR. OVELMEN: That's a hard word for me

1 today.
 2 BY MR. OVELMEN:
 3 Q. -- states, "Former Radio Marti
 4 Director Ernesto Betancourt maintains that he was
 5 ousted from his position in 1990 because of his
 6 alleged opposition to TV Marti and because Mas
 7 Canosa claimed to have lost control of Radio
 8 Marti. In a 1994 statement, Betancourt stated
 9 that his ouster opened the floodgates for the
 10 politicization of the station, dragging it into
 11 exile politics and seriously weakening its
 12 editorial integrity."

13 So says the report. Do you agree with
 14 that paragraph?

15 A. This is a contradictory statement
 16 here, because in one side he claims that I ousted
 17 him from his position in 1990. Then he said that
 18 I did that because I have lost control of Radio
 19 Marti. If I had lost control of Radio Marti how
 20 could I have fired him?

21 Q. Well, that is an interesting
 22 question. Why don't we go to another exhibit.

23 MR. OVELMEN: This one will be the next
 24 exhibit. Could you mark that.

25 And here.

1 (Defendants' Exhibit 159 was marked for
 2 identification.)

3 BY MR. OVELMEN:

4 Q. Have you ever seen this document
 5 before?

6 A. No, I haven't. I don't want to read
 7 it. Just call my attention on whatever you want
 8 to refer to.

9 Q. We are going to go through it pretty
 10 carefully, why don't you take a minute and read
 11 it.

12 A. What page?

13 Q. We are going to probably go through
 14 most of it.

15 A. Okay.

16 (Pause.)

17 MR. CANTERO: Do you have the attached
 18 summary and supporting documentation?

19 MR. OVELMEN: To this?

20 MR. CANTERO: Yes. It talks about an
 21 attached summary and supporting
 22 documentation.

23 MR. OVELMEN: I don't know if I have
 24 that or not. I don't think I do. I would
 25 have to check. I'm not being coy, I don't

1 really know. I would have to check. I will
 2 check for you, and if I've got it I will
 3 produce it.

4 MR. CANTERO: I was just wondering
 5 because it refers to an attachment.

6 MR. OVELMEN: Right. I just honestly
 7 don't know. I have not looked at it, if we
 8 have it.

9 (Pause.)

10 (The witness and his counsel confer off
 11 the record.)

12 (Pause.)

13 THE WITNESS: Okay, what is your
 14 question?

15 BY MR. OVELMEN:

16 Q. Okay. Do you know Mr. Betancourt?

17 A. Yes, I do.

18 Q. Is his statement that he was appointed
 19 director of the whole operation by Charlie Wick,
 20 USIA director, at the time, correct?

21 A. Yes.

22 Q. Is it true that during his tenure at
 23 Radio Marti he had consistently received
 24 outstanding appraisal ratings?

25 A. I don't know that.

1 Q. That wouldn't be something you would
 2 be familiar with?

3 A. I don't get involved in the operations
 4 of the Radio Marti.

5 Q. Is it true that, "Without explanation
 6 or justification, he was asked to accept a
 7 transfer to another element within USIA for which
 8 he lacked any, lacked required academic and
 9 professional background"?

10 A. I did not know. I did not.

11 Q. So you have no reason to dispute that?

12 A. I did not participate in any of the
 13 those decisions or conversations, so I don't
 14 know.

15 Q. He states, "It was my conviction at
 16 the time, and later events confirm that
 17 conviction, that my transfer was instigated by
 18 Mr. Jorge Mas Canosa, who has chaired the
 19 Presidential Advisory Board on Cuba Broadcasting
 20 since its inception."

21 Is that true?

22 A. What is your question?

23 Q. Is that statement true?

24 A. No, it is not true.

25 Q. But it is true you have chaired the

1 Presidential Advisory Board on Cuba since its
 2 inception?
 3 A. Yes, sir.
 4 Q. That part is true?
 5 A. Yes, sir, that's true.
 6 Q. And why is it no one else has ever
 7 been selected to do that?
 8 A. You have to ask President Reagan or
 9 Bush or Clinton.
 10 Q. And you have never felt someone else
 11 should have the job?
 12 A. That is a presidential decision, that
 13 is not my decision, just to be there.
 14 Q. But you could always resign if you
 15 wanted to?
 16 A. Sure I could resign but I have no
 17 intention to resign.
 18 Q. And why that is that?
 19 A. Because I think what I do at Radio
 20 Marti is important.
 21 Q. What is it that you do that is
 22 important?
 23 A. I already went through all of that
 24 before, I answered that question.
 25 Q. What is the part that is important? I

1 tenure, I had to keep on guard in my dealings
 2 with Jorge Mas Canosa, Chairman of the
 3 Presidential Advisory Board, because he felt that
 4 Radio Marti was his platform, rather than a
 5 taxpayers' paid federal operation."
 6 Do you feel that Radio Marti is your
 7 platform?
 8 A. No, sir.
 9 Q. Why do you think Mr. Betancourt would
 10 have that perception?
 11 A. He's just a disgruntled former
 12 employee.
 13 Q. Are you saying that he had that
 14 opinion only after he left?
 15 A. Yes, sir.
 16 Q. And prior to leaving he didn't have
 17 this opinion?
 18 A. No, sir. There is a letter in the
 19 Miami Herald published which said that I never,
 20 never interfered with any operations of Radio
 21 Marti and I never tried to exercise any influence
 22 over him, which I will make available to you.
 23 Unfortunately I don't have it here with me.
 24 Q. Who wrote the letter?
 25 A. He himself, Ernesto Betancourt. And

1 am not asking for a litany of duties. What is
 2 important?
 3 A. But you ask questions I already
 4 answered and I am not going to answer again.
 5 And I want to tell you because I want
 6 to keep this friendly, I am going to answer this
 7 again, but the next repetitive question, I am not
 8 going to answer. Okay?
 9 Q. Okay, sir.
 10 A. We got to, still I advise the
 11 President of United States, Congress and the
 12 director of USIA information on Cuba Broadcasting
 13 and I also work with Congress to make certain
 14 that Radio Marti stay as a viable option to the
 15 Cuban people to listen to the free flow of ideas
 16 and information. That's what I do on Radio
 17 Marti.
 18 Q. Okay, and that position has to be
 19 confirmed, initially had to be confirmed by the
 20 Senate?
 21 A. Right.
 22 Q. That was an advise and consent?
 23 A. Yes. And I was confirmed twice by
 24 unanimous vote by the US Senate.
 25 Q. He states further, "Throughout my

1 it has been published and I got copies of it. So
 2 these thinking and these opinions are after his
 3 firings.
 4 Q. So you are saying that --
 5 A. Or after he was fired.
 6 Q. -- rather than his affidavit we should
 7 go with his letter then, is that -- okay.
 8 He further states that, "From the very
 9 beginning Mas Canosa tried to influence the
 10 hiring and the operation of Radio Marti."
 11 Is that true?
 12 A. No, it is not true.
 13 It is a contradiction here. He said
 14 that, "Both of us," meaning him and I, "went to
 15 the personnel office of Mr. Bruce Boyd, and Mas
 16 Canosa told him in my presence to ignore such
 17 claims by any applicants," saying that I referred
 18 him or I asked him for a job.
 19 And up to that, up to the time of my
 20 resignation he complied with that promise. So --
 21 Q. Well --
 22 A. Let me go on.
 23 Q. Of course.
 24 A. That is my line.
 25 Q. Of course.

Page 1698

1 A. So he admits here that I up to the
2 time of resignation, I complied absolutely with
3 not exercising any influence to hire any
4 applicant.
5 Then he said, "in earlier recruiting
6 Mas Canosa intervened on behalf of some
7 candidates. It is my understanding that such was
8 the case of Ms. Che Ferch."
9 So there is a contradiction here, did
10 I exercise influence or I did not exercise
11 influence, did I keep my promise or I did not
12 keep my promise.
13 He had a problem with this lady in
14 Radio Marti which was a very ugly incident there
15 and probably that's what he is claiming the thing
16 here. I think it is just a disgruntled employee.
17 Q. It is not really contradiction,
18 though, is it? He said it was an earlier
19 recruiting that that occurred?
20 A. Yes, but he was there, he was a
21 director, he was the only director of Radio
22 Marti.
23 Q. I understand.
24 A. The first director of Radio Marti.
25 Q. I take him to be saying that it was

Page 1699

1 after that meeting that he was able to resist,
2 isn't that what he is saying here?
3 A. No, I didn't read it that way.
4 Q. All right.
5 He says, "Once I became director of
6 the whole operation, shortly after we went on the
7 air, I was able to ensure that Marti was
8 objective and balanced in its broadcast. This
9 was in spite of the fact that Mas Canosa
10 continued in his attempts to influence the
11 operation of Marti indirectly."
12 A. That contradicts his statement a few
13 days before he was fired, in a letter that he
14 made public, saying that I never attempt to
15 influence him or the operations of Radio Marti
16 directly or indirectly.
17 Q. Did you have anything to do with his
18 writing that letter?
19 A. No, I didn't.
20 Q. Do you know why he wrote the letter?
21 A. The letter was written in response to
22 the accusation that were being flown that I was
23 exercising influence on Radio Marti.
24 Q. Do you know what communications he had
25 with people prior to writing the letter?

Page 1700

1 A. No, I don't.
2 Q. Do you know what he says about, do you
3 know what his explanation today is of that
4 letter?
5 A. He doesn't talk about that letter.
6 Q. You don't think he talks about the
7 letter?
8 A. He doesn't talk about that letter. It
9 is not in his best interest to talk about this
10 letter after he states all this misinformation
11 here.
12 Q. He then says, "These attempts were
13 channeled through Dr. Humberto Medrano, who was
14 the deputy director. His appointment had been
15 arranged by Mas Canosa before I first joined the
16 research staff and when I became director this
17 was a done decision."
18 Is that true?
19 A. No, sir. Dr. Medrano is one of the
20 most prestigious journalists ever in the history
21 of Cuba. And it is humiliating to him and it
22 should be very offensive to every Cuban to hear
23 that Betancourt holds Dr. Medrano in such
24 despise.
25 Q. Are you close to Mr. -- Dr. Medrano?

Page 1701

1 A. Yes, I know him very well.
2 Q. All right, sir.
3 "Although," Betancourt continues, he
4 says, "Although Dr. Medrano was very dedicated to
5 the station's success and made a substantial
6 contribution to it, at all times it was clear
7 that he was Mas Canosa's man within the Radio
8 Marti management team."
9 Is that a fair statement?
10 A. Dr. Medrano is nobody's man.
11 Dr. Medrano is a tremendous patriot and man of
12 extraordinary talent, sensitivity and prestige to
13 be anybody's man.
14 Q. Do you have a lot of communications
15 with him?
16 A. Yes, I communicate with him.
17 Q. How often typically?
18 A. Once a week and talk to him on the
19 phone.
20 Q. Do you discuss Radio Marti issues?
21 A. No.
22 Q. Have you ever?
23 A. Sometimes I do but most of the time I
24 don't.
25 Q. Why would Betancourt have a perception

1 that he was your man?
 2 A. Because Betancourt always saw a
 3 conspiracy, always saw people turning against
 4 him. That's the only explanation that I have. I
 5 don't have any other explanation.
 6 Q. "As I explain at length in the
 7 attached documentation, I reassigned Dr. Medrano
 8 to the Miami office in 1989, because with the
 9 collapse of the Soviet Bloc, there was increased
 10 pressure from Mas Canosa to get Radio Marti
 11 coverage of his political activities and
 12 Dr. Medrano was the instrument through which that
 13 pressure was exerted," Betancourt says.
 14 Do you agree with that?
 15 A. That contradicts his letter a few days
 16 before he was ousted, that I never did that,
 17 so...
 18 Q. So is it possible he in his letter was
 19 engaged in some kind of public relations
 20 activity?
 21 A. I don't know. The letter is very
 22 clear. He states that I never exercised any
 23 influence directly or indirectly with him or with
 24 Radio Marti.
 25 Q. Did you propose the concept of TV

1 Q. The United States Government has never
 2 violated international law?
 3 A. Yes, I --
 4 Q. Or any other law?
 5 A. Yes, I agree, not that I know of. You
 6 are an attorney, you might know more than I do,
 7 but I don't recall any instance where the United
 8 States have violated international law in the
 9 case of TV Marti.
 10 Q. Oh.
 11 A. It has not violated any law and as far
 12 as I am concerned or that I have learned, I don't
 13 know that they have violated any law. If they
 14 have, you know, I don't know of.
 15 Q. "I was also concerned," Dr. Betancourt
 16 states in his affidavit, "that if Marti began TV
 17 broadcasts, Castro would not only jam its signal,
 18 but also would interfere somehow with Radio Marti
 19 broadcasts, as he eventually did to our AM
 20 signal."
 21 Is that true?
 22 A. No.
 23 Q. Has he jammed TV Marti?
 24 A. Yes.
 25 Q. Has he tried to interfere or

1 Marti in 1989?
 2 A. Yes, sir, I did.
 3 Q. And was it determined that TV Marti
 4 could legally broadcast into Cuba only between 3
 5 a.m. and 6 a.m.
 6 A. Yes, sir.
 7 Q. Do you agree that most people are
 8 sleeping at that time?
 9 A. Yes, sir, I do.
 10 Q. Now, Mr. Betancourt says, "I felt that
 11 broadcasting a TV signal, in violation of
 12 international laws, in the stealth of night, was
 13 demeaning to both Marti and the US government and
 14 would ultimately cause Marti to lose much of its
 15 credibility."
 16 Do you agree with that?
 17 A. No, I don't.
 18 Q. Do you think it is a violation of
 19 international laws?
 20 A. No, I don't.
 21 Q. Why is that?
 22 A. Because we are broadcasting and the
 23 United States Government doesn't do anything that
 24 breaks international law or the government does
 25 not engage in the business of violating law.

1 interfered with the Radio Marti broadcasts?
 2 A. Yes, but not after TV Marti, before
 3 that, since day number one Castro tried to
 4 interfere with Radio Marti.
 5 Q. Was there any change in the
 6 interference with the AM signal after TV Marti?
 7 A. No, just the normal increase and the
 8 normal effort of Castro to jam the AM signal
 9 which he tried from day number one when Radio
 10 Marti went first on the air.
 11 Q. He states then, "despite these
 12 concerns which were shared by many members of the
 13 TV task force, Mas Canosa got the program
 14 approved and funded by Congress."
 15 Is that true?
 16 A. I am not Superman. He is trying to
 17 put me here as a to Superman.
 18 Q. Did you play a role?
 19 A. I played a role but I did not get
 20 Congress to approve that. I play a role like
 21 many other people.
 22 Q. Was it a significant role?
 23 A. What do you mean by significant?
 24 Q. We have to go by what you mean. What
 25 is your understanding of the word significant?

1 A. You are the one who asked the
 2 question, you have to define that.
 3 Q. The only thing that matters is what
 4 you think.
 5 A. I played a role, I would say, you
 6 know, a rather modest role, but I played a role
 7 in approval of Radio Marti, but I did not play
 8 this role of Superman here that he is trying to
 9 give me.
 10 Q. Who were more important players?
 11 A. The Congressmen, the Senators, the
 12 President of United States, the State Department,
 13 the National Security Council, the people who
 14 funded, the people who directed, the people who
 15 discussed it, the people who had the ultimate
 16 responsibility of getting TV Marti on the air,
 17 the USIA management people. Any one of those
 18 people were more important than I was in that
 19 process.
 20 Q. Did you attempt to persuade any of
 21 those people?
 22 A. Yes, you are right, I did.
 23 Q. All right, sir. And you were
 24 successful as part of that effort, you were
 25 successful?

1 THE WITNESS: I write all those names
 2 for you later on, just leave a blank space.
 3 BY MR. OVELMEN:
 4 Q. If you like I have one of those.
 5 Okay, then he says, "One of the
 6 reasons given for my transfer was my opposition
 7 to TV Marti."
 8 A. Where is that, what page is that?
 9 Q. This is the next paragraph, it's page
 10 4 of 5, second paragraph.
 11 A. Okay.
 12 Q. It is the second paragraph.
 13 A. What is the question?
 14 Q. The question is, was Mr. Betancourt
 15 opposed to TV Marti?
 16 A. He was very supportive of TV Marti at
 17 the beginning, very, very supportive.
 18 For some strange reasons at the end he
 19 became an opponent of TV Marti, I don't know the
 20 reason why that changed but it did.
 21 Q. And you were a strong advocate of
 22 Radio Marti -- TV Marti?
 23 A. Yes, and I am.
 24 Q. And so he was an opponent at the end
 25 and --

1 A. The effort was successful, I don't
 2 know if I was personally successful or not.
 3 Q. Who else was involved in that effort?
 4 A. Many, many people.
 5 MR. CANTERO: Objection, asked and
 6 answered.
 7 THE WITNESS: In the Cuban American
 8 community.
 9 BY MR. OVELMEN:
 10 Q. No, I am asking -- who in the
 11 community?
 12 THE WITNESS: You said no answer?
 13 MR. CANTERO: No, I said asked and
 14 answered, I thought.
 15 MR. OVELMEN: Now I asked a different
 16 question.
 17 MR. CANTERO: Okay.
 18 BY MR. OVELMEN:
 19 Q. Who were other people in the Cuban --
 20 A. Many in the Cuban American community.
 21 Q. I would just like some names.
 22 A. Some names, you got Pepe Hernandez,
 23 you got Domingo Moreira, you got Tony Coja, you
 24 got Tony Navarro.
 25 THE COURT REPORTER: Excuse me.

1 A. No, he was for.
 2 Q. I thought you said in the end he was
 3 opposed.
 4 A. He was for, very enthusiastically for
 5 at the beginning, then at the end before he was
 6 ousted he turned against TV Marti.
 7 Q. I see.
 8 So you were, the two of you were in
 9 disagreement on the TV Marti issue?
 10 A. No, I really did not discuss with him
 11 too much TV Marti because at the end he was
 12 irrelevant in great part to what was going to
 13 happen with TV Marti.
 14 Q. So you would disagree with his
 15 affidavit when it says, "Since it was Mas Canosa
 16 who engineered my transfer, this is an instance
 17 in which his abuse of authority has cost dearly
 18 to the federal government"?
 19 A. Yes, I disagree.
 20 Q. He states that you are simultaneously
 21 the chairman of CANF and the chairman of the
 22 Presidential Advisory Board since 1984. And his
 23 affidavit claims that you have systematically
 24 evaded confirmation hearings at which some ugly
 25 clashes with the law would be aired.

1 Is that true?
 2 A. No, it is not. I have not evaded any
 3 type of confirmation. I spent a lot of time up
 4 in Congress in Washington.
 5 Q. Have you discussed with the
 6 administration the reappointment process at any
 7 time?
 8 A. No, sir.
 9 Q. So you never talked to them about what
 10 they are going to do each year when your term --
 11 A. No.
 12 Q. -- would other otherwise run?
 13 A. Never.
 14 MR. CANTERO: Objection. I don't think
 15 it is, it has been testified that his term
 16 would run every year. I think that's the
 17 testimony.
 18 MR. OVELMEN: It is either one or three
 19 years.
 20 MR. CANTERO: Three years.
 21 MR. OVELMEN: I don't remember any more
 22 which it is.
 23 BY MR. OVELMEN:
 24 Q. So with an amendment, it is either one
 25 or three years.

1 fly to Miami and meet with Mas Canosa."
 2 Is that true?
 3 A. Untrue.
 4 Q. Did he fly, did Mr. Gelb fly to Miami
 5 to meet with you?
 6 A. Yes, I met with him in Miami.
 7 Q. At whose suggestion?
 8 A. He was en route I think to a trip to
 9 Central America and I met him in Miami.
 10 Q. Did you suggest that he stop or did he
 11 suggest to you that he --
 12 A. I don't know how the meeting took
 13 place or who invited who or if he called me or I
 14 called him, but I remember that he was en route
 15 to some Central American countries and I saw him
 16 I think at the airport.
 17 Q. The affidavit then says that "Mas
 18 Canosa told me he was going to hold up Mr. Gelb's
 19 confirmation in the Senate until he met with
 20 him. Later on, Mas Canosa asked me to fly to
 21 Miami to attend a meeting of Mr. Gelb with him
 22 and Jeb Bush.
 23 "I told Mas Canosa it was improper
 24 for me, as a USIA career civility servant
 25 subordinate to Mr. Gelb, to be present at such a

1 Now, the affidavit says, "Events in
 2 the previous months have made clear that Mr. Gelb
 3 was being pressured by Mas Canosa to remove me
 4 from Marti's operational management."
 5 Is that an accurate statement?
 6 A. That's untrue.
 7 Q. Have you had communications with Gelb
 8 regarding Mr. Betancourt?
 9 A. No, sir.
 10 Q. So you have never talked to him?
 11 A. No, sir.
 12 Q. How about intermediaries?
 13 A. No, sir.
 14 Q. Any memoranda?
 15 A. No, sir.
 16 Q. Now, the affidavit says, "Mas Canosa
 17 has been able to exert great pressure on both
 18 Marti and USIA management. He has used his
 19 access to Congress to hold back or support
 20 appropriations and appointments to pressure USIA
 21 executives to do what he wanted. One specific
 22 instance which I witnessed took place in January
 23 or February 1989.
 24 "Prior to being confirmed as the
 25 director of USIA, Mr. Bruce Gelb was forced to

1 meeting, but he insisted."
 2 Is that all true?
 3 A. Soap opera, untrue.
 4 Q. So it is not true?
 5 A. No.
 6 Q. You didn't ask him to join you at the
 7 meeting?
 8 A. Who?
 9 Q. You did not ask --
 10 A. I did not ask.
 11 Q. -- Mr. Betancourt to join you at the
 12 meeting?
 13 A. No.
 14 Q. "Only Mr. Gelb can tell what
 15 transpired at the meeting."
 16 A. I agree with that.
 17 Q. "Radio Marti" --
 18 MR. SCHWIEP: You can tell.
 19 Q. -- "and USIA travel records will
 20 confirm that I was to fly the same day as
 21 Mr. Gelb."
 22 Are you aware of those records?
 23 A. No, I don't.
 24 Q. So you disagree then when the
 25 affidavit states, "It was clear to me that

Page 1714

1 neither I nor anybody else would be able to
 2 manage Radio Marti free of political pressure
 3 from Mas Canosa and, since by then I had lost any
 4 trust in USIA management, I resigned."
 5 Your view would be that that is
 6 completely mistaken?
 7 A. What?
 8 Q. That would be completely mistaken, you
 9 don't agree with --
 10 MR. CANTERO: Read that.
 11 THE WITNESS: What is mistaken?
 12 MR. CANTERO: Talking about the first
 13 full paragraph on page 5.
 14 MR. OVELMEN: Right.
 15 THE WITNESS: What is your question?
 16 Ask me the question.
 17 MR. CANTERO: The question was, do you
 18 disagree with --
 19 BY MR. OVELMEN:
 20 Q. Do you disagree with that?
 21 A. With that paragraph?
 22 Q. Yes.
 23 A. There are many things in that
 24 paragraph. What part of that paragraph?
 25 Under those conditions; what

Page 1715

1 conditions?
 2 "When Mr. Gelb offered me the
 3 transfer to another position;" what position?
 4 "It was clear to me that neither I
 5 nor anybody else would be able to manage Radio
 6 Marti free of political pressure from Mas
 7 Canosa."
 8 Q. That clause, yes.
 9 A. No, "to manage Radio Marti free of
 10 political pressure from Mas Canosa," I disagree
 11 with that.
 12 Q. Okay, thank you.
 13 A. Come on Rick, we are getting there.
 14 Q. We are getting there.
 15 A. We are getting there.
 16 MR. CANTERO: The court reporter has a
 17 copy of this?
 18 THE COURT REPORTER: Yes.
 19 MR. OVELMEN: Yes. Mark this as our
 20 next exhibit.
 21 THE WITNESS: Don't break it, and keep
 22 that on, let me go to the bathroom, 30
 23 seconds.
 24 MR. SCHWIEP: Cut it off. We don't
 25 need to have an empty chair.

Page 1716

1 MR. CANTERO: The empty chair defense.
 2 (Defendants' Exhibit 160 was marked for
 3 identification.)
 4 (Recess.)
 5 MR. OVELMEN: For the record, this is
 6 an appendix to a federal court filing and we
 7 are looking at a transcript translation
 8 filed with the federal court in a case
 9 styled, In Re: Seizure of Paintings and
 10 Other Property Pursuant to Search Warrants,
 11 which is in front of Judge Marcus, 89-2613.
 12 MR. CANTERO: Do you have the tape from
 13 this? Do you have the original Spanish
 14 transcript?
 15 MR. OVELMEN: I don't have the original
 16 Spanish, I have the court filing.
 17 MR. SCHWIEP: It was produced.
 18 THE WITNESS: I need the tape and the
 19 Spanish version, otherwise I am not going to
 20 answer any question regarding this with the
 21 exception that I have nothing to do with the
 22 seizure of those paintings of Mr. Cernuda.
 23 I did not talk to any official directly or
 24 indirectly relating to Cernuda things.
 25 Once you have the tape and you play

Page 1717

1 that tape of me with the Spanish
 2 translation, then I will testify. I will
 3 not take this transcript. I don't know what
 4 they are talking about.
 5 BY MR. OVELMEN:
 6 Q. Right. I am just going to ask you if
 7 you said these things. If you didn't say them,
 8 you didn't say them. If you don't remember, you
 9 don't remember.
 10 A. No, no, I am not going to answer
 11 anything that I didn't hear the tape because this
 12 is supposedly of a transcript of a tape of one of
 13 my radio interviews, right, so I think that I
 14 have a right to say you must take it from the
 15 source, I want to hear the tape, and then with
 16 the tape as you show me on television, I would be
 17 more than glad to answer line by line. But I
 18 won't take this transcript because probably this
 19 has been politically manipulated.
 20 MR. OVELMEN: Do you want to talk to
 21 him for a second?
 22 MR. CANTERO: Yes.
 23 (Discussion off the record.)
 24 THE WITNESS: Ask your question.
 25

1 BY MR. OVELMEN:
2 Q. This purports to be a transcript of a
3 radio broadcast on May 8, 1989 and let me direct
4 your --

5 MR. CANTERO: Do you know what station
6 or anything?

7 MR. OVELMEN: It was QBA I think but I
8 don't remember any more.

9 MR. SCHWIEP: He is on QBA now, but I
10 don't know where he was then.

11 MR. CANTERO: I'm confused because
12 there is an index to exhibits and then there
13 is this transcript.

14 BY MR. OVELMEN:

15 Q. This is item 9. It begins with the
16 statement, "Mr. Cernuda declared to the press
17 that behind his case was, was the Foundation and
18 Jorge Mas Canosa, that it was a witch hunt. What
19 can Mas Canosa say about this?"

20 Do you recall that question being
21 asked?

22 A. I would have to hear the tape to
23 answer.

24 Q. So you don't remember --

25 A. I would to have to hear the tape to

1 that. I want to reemphasize that I had
2 absolutely nothing directly or indirectly to deal
3 with the seizure of Mr. Cernuda's paintings. I
4 have testified before committees in Congress and
5 I have requested that the relationship that does
6 exist between many businesses in South Florida
7 and Fidel Castro should be investigated, but
8 nothing directly or indirectly relating to
9 Cernuda.

10 For all this statement here, I will
11 keep giving you the same answer. When I hear the
12 tape, as you showed me that videotape, then I
13 will answer those questions. I don't refuse to
14 answer the questions, I just want to hear and see
15 the original copy of this.

16 MR. CANTERO: Why don't you ask
17 independent of this whether he recalls
18 anything about the May 8th broadcast.

19 BY MR. OVELMEN:

20 Q. Do you recall anything about the
21 broadcast you made?

22 A. I go to the radio very often. I don't
23 recall May 8, 1988, May 9, if I was on the radio
24 or not. But I go frequently to the radio.

25 Q. Do you recall saying on the radio that

1 answer that question.

2 Q. But looking at this doesn't refresh
3 your recollection?

4 A. I would have to hear the tape.

5 Q. All right. Do you recall answering,
6 "Well, this is not a witch hunt, this is a
7 delinquent hunting?"

8 A. I would to have to hear the tape to
9 answer that question.

10 Q. The next paragraph states, "This is a
11 police problem, not a political problem. When I
12 was asked about Mr. Cernuda's reaction, that I
13 don't know why he expresses himself in such a
14 way, I think it is the stress, the unpleasant
15 moment he was that going through; in effect, the
16 Foundation and I personally, Jorge Mas Canosa,
17 for a long time, not now, I have been two years
18 on this. I have asked all committees that I have
19 testified before the United States Congress to
20 put a stop to this shameless business existing
21 among the new merchants, that exist here always
22 ready to sell their soul for a dime and sell
23 their conscience."

24 Do you recall saying that?

25 A. I have to hear the tape to answer

1 you specifically went before the Department of
2 Treasury?

3 MR. CANTERO: Regarding Cernuda or --
4 THE WITNESS: I have to hear the tape
5 to answer that question.

6 MR. CANTERO: Regarding Cernuda, Rick?

7 MR. OVELMEN: What is that? Yes.

8 THE WITNESS: This is incomplete.

9 MR. CANTERO: That he went to the
10 Department of Treasury regarding Cernuda?

11 MR. OVELMEN: Right.

12 THE WITNESS: You ask me a specific
13 question, I will respond to you.

14 But regarding this tape, it is just
15 incomplete, absolutely incomplete.

16 I think that you want honest answers
17 from me and I think that what is honest is
18 to hear the tape and have the full version
19 with certified copy that I could verify with
20 the original tape.

21 If you ask me a specific question
22 regarding Cernuda I will be more than glad
23 to respond that and I think that that's what
24 is the issue here, the issue is whether I
25 have anything to do with Cernuda seizure of

1 paintings or not and I am more than glad to
2 respond to that.

3 BY MR. OVELMEN:

4 Q. Do you recall whether or not you had
5 people inside Cernuda's premises investigating
6 him?

7 A. No, sir, I did not have anybody
8 investigating Cernuda or inside, what you said,
9 inside where?

10 Q. His premises.

11 A. No, sir, I did not.

12 Q. Do you recall saying, "yes, we in
13 effect are responsible for this and for other, of
14 other investigations"?

15 A. Sir, I am not going to respond to that
16 until I hear the original tapes. You ask me
17 specific questions about Cernuda, I will respond
18 to them.

19 Q. I am just asking, I am just asking if
20 you said it. I am asking a specific question:
21 Did you say that you were responsible for the
22 Cernuda investigation and other investigations?

23 A. No. I did not say that I was
24 responsible for the Cernuda investigation.
25 I go back to my same statement that I

1 made about my testimony on hearings before United
2 States Congress.

3 Q. So you don't recall then, and without
4 the tape you wouldn't know whether you said,
5 "Once again, we are willing to assume all
6 responsibilities and all the inherent risks with
7 this type of attitude"?

8 A. I already answered that question.

9 Q. Did you believe that there was
10 corruption in the Cuban interest section in
11 Havana?

12 A. No, I don't. There were rumors and
13 accusation about that but I never got any
14 evidence or proof of that.

15 Q. What did you think of Jerry Scott?

16 A. I really don't have an opinion about
17 Jerry Scott. I think that I never met the man,
18 or if I ever met him it was very brief.

19 Q. You didn't regard his involvement in
20 Radio Marti?

21 A. No.

22 Q. And his evaluations of Radio Marti as
23 a shame and embarrassment?

24 A. I don't handle that on Radio Marti. I
25 don't have any recollection of that. He used to

1 work for the US government, didn't he?

2 Q. Cuban interest section. US interest
3 section in Cuba.

4 Did you believe that Cernuda was
5 engaged in an illegal practice?

6 A. I don't know, sir.

7 Q. Did you express any opinion on this
8 radio program to that effect?

9 A. I already answered that question. I
10 have to hear the tape.

11 Q. Do you recall ever criticizing Jerry
12 Scott?

13 A. Not that I recall, no, sir.

14 Q. Do you recall saying, "I am going to
15 continue procuring the investigation of Cernuda
16 and of the 20 more Cernuda's that are here in
17 Miami of 200 and 2,000"?

18 A. I have to hear the tape.

19 Q. Does that sound like something you
20 would agree to?

21 A. I have to hear the tape.

22 Q. Do you think that there were people
23 violating the law by trading with Cuba?

24 A. Yes, I do.

25 Q. Here, okay.

1 I would like you to look at this last
2 section of the tape and see if you agree with
3 it. Whether or not you said it, do you agree
4 with it?

5 A. I have to hear the tape. I am not
6 going to answer that question.

7 Q. No, no I am not asking whether you
8 said it, I am saying --

9 MR. CANTERO: He just wants to know if
10 you would agree with the statement.

11 BY MR. OVELMEN:

12 Q. Agree with what's in it.

13 A. Where is it?

14 MR. CANTERO: Page 10.

15 Q. Page 10, Mas Canosa.

16 MR. CANTERO: Which part, everything on
17 the last paragraph?

18 MR. OVELMEN: Right.

19 BY MR. OVELMEN:

20 Q. I am going to ask you if you agree
21 with it all or part of it or none of it.

22 (Pause.)

23 MR. CANTERO: I got to tell you, Rick,
24 I don't know where this, we can't even tell
25 if this is an accurate translation. It is

1 not a certified translation.
 2 THE WITNESS: There are certain things
 3 that --
 4 MR. CANTERO: You are assuming that --
 5 MR. OVELMEN: Some things you agree
 6 with and some --
 7 THE WITNESS: I have to --
 8 MR. CANTERO: Let me finish. Then you
 9 are assuming that the Spanish transcript is
 10 an accurate reflection of the tape.
 11 MR. OVELMEN: Actually I'm not assuming
 12 any of that. I am just wondering if this
 13 transcript helps him remember what he said.
 14 THE WITNESS: But you are assuming,
 15 because you are assuming that these
 16 transcripts come from an original tape that
 17 was taped as a result of a radio interview
 18 that they made of me. And all what I am
 19 asking you is let me hear the tape and let
 20 me see the original documents.
 21 You are referring to things that I
 22 don't think is fair for me to respond to a
 23 translation of something that I have not
 24 heard, of a document that I have not seen
 25 and that I don't know if I ever participated

1 anytime; you can do it tonight? You have a
 2 tape? Let's go play it.
 3 Q. I can't do it tonight, I have a
 4 problem with the Eastern District of Pennsylvania
 5 so I've got to leave. But perhaps we can
 6 schedule --
 7 A. Any of your colleagues can show me --
 8 MR. CANTERO: I want to get this over
 9 with.
 10 A. -- can let me hear that tape tonight.
 11 MR. SCHWIEP: How about if we brought
 12 in an official translated version by the
 13 court reporter for the Southern District of
 14 New York.
 15 THE WITNESS: I want to hear the tape
 16 and I will be here until hell freezes
 17 overnight tonight, until tomorrow morning to
 18 hear that tape.
 19 You bring me that tape, you can do it,
 20 he can bring it, and then I will be more
 21 than glad to respond to your questions.
 22 MR. OVELMEN: I can't do it, I have a
 23 court obligation I have to meet.
 24 THE WITNESS: We can do it in August
 25 sometime.

1 on radio interview on that date, on whatever
 2 day, May 8, 1989.
 3 So all what I am asking and I am
 4 willing to cooperate with you and answer all
 5 the questions, let me listen to the original
 6 tape.
 7 MR. CANTERO: But notwithstanding that,
 8 Rick's question is, do you agree with all or
 9 part of that last paragraph on page 10,
 10 whether or not you said it.
 11 THE WITNESS: I want to hear the
 12 original tape because I don't have an exact
 13 recollection if I ever said any of those
 14 things or not.
 15 MR. CANTERO: His question isn't
 16 whether you said it or not, do you agree
 17 with it even if somebody else said or nobody
 18 has ever said it.
 19 THE WITNESS: I will answer that when I
 20 listen to the original tape
 21 BY MR. OVELMEN:
 22 Q. When can you do that?
 23 A. Any time you want to.
 24 Q. Can we get a date?
 25 A. You send me a copy. In August

1 MR. OVELMEN: All right, that's fine.
 2 When is our memo due?
 3 MR. SCHWIEP: Due July 22.
 4 MR. OVELMEN: Right, but they get a
 5 response, we get a reply, get it before the
 6 reply.
 7 MR. CANTERO: Is this a question of
 8 actual malice?
 9 MR. SCHWIEP: It is in the article.
 10 MR. OVELMEN: Right. I don't want to
 11 go into --
 12 MR. CANTERO: That is not the question.
 13 MR. OVELMEN: It is, but I don't want
 14 to explain it, okay, but it is.
 15 MR. CANTERO: How long do I get to
 16 respond?
 17 MR. SCHWIEP: As long as you want.
 18 THE WITNESS: Do you have the tape? We
 19 should play it today.
 20 MR. SCHWIEP: We have the tape.
 21 MR. CANTERO: We'll stipulate if we
 22 need more time because, you know, now that
 23 we have prolonged the time for your --
 24 THE WITNESS: I think that we should --
 25 MR. CANTERO: I will be on vacation.

1 THE WITNESS: Listen, Raul, I that
 2 think we finish today.
 3 MR. OVELMEN: Raul, you know we will
 4 accommodate your vacation, I will always do
 5 that, because I have vacation.
 6 THE WITNESS: I want to help all of you
 7 and I want to be very accommodating, but I
 8 would like to finish this deposition today.
 9 MR. OVELMEN: I have another --
 10 THE WITNESS: I don't see why you are
 11 holding back on that tape today. Let me
 12 hear the tape.
 13 MR. CANTERO: He doesn't have it.
 14 Do you have it?
 15 MR. OVELMEN: Jorge, Mr. Mas, I would
 16 like to accommodate you. Two problems with
 17 that. I have another box of material. I
 18 can't go past 6:00.
 19 I can't go past 6:00 for two reasons,
 20 one, I have a problem that's come up with
 21 the Eastern District of Pennsylvania, and
 22 two, I am sick, so I am going to have to
 23 stop at 6.
 24 However, I do agree that we don't have
 25 to do it until August. All we have to do is

1 that, B, I can't do that, and, C, I wouldn't
 2 do it if I could. Okay. And I am not a bad
 3 guy, I just can't do it.
 4 MR. CANTERO: Nobody is saying --
 5 MR. OVELMEN: I would be lucky to go
 6 another hour.
 7 THE WITNESS: Nobody is judging you
 8 personally.
 9 MR. CANTERO: We are saying, Rick, that
 10 we want to get this overwith and are willing
 11 to do it.
 12 MR. OVELMEN: What I am trying to do to
 13 accommodate you. You are saying we can do
 14 it in July, we can do it in August,
 15 whatever; I know you are a busy guy, I know
 16 you are an important guy, and I am not a
 17 rude guy.
 18 But I can't do any more for you today,
 19 okay, because I am at the end of my rope for
 20 two reasons.
 21 So I apologize.
 22 MR. CANTERO: I agree, Rick is not a
 23 rude guy.
 24 MR. SCHWIEP: We can stipulate.
 25 MR. OVELMEN: Let us go back to CRS-6.

1 do it before our reply brief is due. But I
 2 cannot physically go beyond six nor can I
 3 for professional reasons and I wish I
 4 could. Believe me, no one wants to finish
 5 this deposition more than me.
 6 MR. SCHWIEP: I, it may make sense, may
 7 not, but I know Mr. Mas wanted to do the El
 8 Chairman Soy Yo in writing also.
 9 MR. CANTERO: He is ready for that
 10 already.
 11 THE WITNESS: If you stick to the
 12 substance of the lawsuit instead of all the
 13 other matters relating to the lawsuit we
 14 would have finished this deposition months
 15 ago.
 16 MR. CANTERO: Just for the record, we
 17 are ready to stay here all night if we have
 18 to finish this thing today because that's
 19 really what both Mr. Mas wants and what I
 20 want.
 21 THE WITNESS: That's the commitment
 22 that I made, that I was going to stay here
 23 today until I finish this deposition. Now
 24 you have changed the rules.
 25 MR. OVELMEN: No, I never, A, agreed to

1 BY MR. OVELMEN:
 2 Q. Take a look, Mr. Mas, if you would,
 3 please, at CRS-6. 8, no, we are going to 8 now.
 4 A. Just one second, Rick.
 5 Q. Sure.
 6 THE VIDEOGRAPHER: We need to go off
 7 record.
 8 MR. OVELMEN: Gentlemen, just for a
 9 second, he is making a call.
 10 (Discussion off the record.)
 11 THE VIDEOGRAPHER: We are back on
 12 record and this is tape No. 4.
 13 BY MR. OVELMEN:
 14 Q. All right, Mr. Mas, we are looking at
 15 the CRS report for Congress entitled Radio and
 16 Television Broadcasting to Cuba: Background and
 17 Current Issues. And we are at page 8.
 18 And the first question I have is, were
 19 you aware that the GAO issued a report on TV
 20 Marti's compliance with broadcast standards?
 21 That's the second paragraph.
 22 A. I probably heard it. But I don't
 23 recall the details.
 24 Q. Do you recall that the majority issued
 25 a report and there was I guess a minority view as

1 well, according to the report two of the three
2 consultants believed that the broadcasts related
3 to Cuba and the Cuban American community lacked
4 balance and did not meet established Voice of
5 America standards. Do you recall that
6 conclusion?

7 A. No, but, you know, the director of
8 Radio Marti is the one who is very familiar with
9 all those reports here. If you are genuinely
10 interested in knowing about this here you can ask
11 him.

12 Q. Were you aware that based on that
13 report the GAO recommended that the USIA director
14 instruct VOA to institute procedures to ensure
15 that TV Marti's broadcasts meet established VOA
16 standards?

17 A. Same answer, you know, the one who is
18 familiar with these reports is the director of
19 Radio and TV Marti, not me.

20 Q. Okay.

21 A. I saw this for the first time when you
22 just brought it here.

23 Q. You had never seen the GAO report as
24 well?

25 A. No, I haven't.

1 international broadcasting in 1991 that concluded
2 the TV Marti service should be terminated?

3 A. I think that I recall that, yes. I
4 don't remember the details but it was some kind
5 of task force, that made that recommendation.

6 THE VIDEOGRAPHER: Could you raise your
7 mike.

8 MR. OVELMEN: Sorry.

9 THE VIDEOGRAPHER: Thank you.

10 MR. OVELMEN: Off the record.

11 (Discussion off the record.)

12 BY MR. OVELMEN:

13 Q. Do you recall that in March 1994
14 another task force on the same subject chaired by
15 John Hughes also concluded that TV Marti was
16 pointless and wasteful?

17 A. If you say so that happened.

18 Q. You don't know?

19 A. I don't recall that.

20 Q. Okay.

21 A. Whether it happened or not.

22 Q. Take a look at page CRS-15 under
23 Advisory Board.

24 Were you aware that the CRS report had
25 the following language: "The panel report had

1 Q. All right.

2 I direct your attention to CRS-9,
3 middle of the page, heading, TV Marti's
4 Broadcasting Audience. This report states,
5 "Another fundamental concern for many observers,
6 including members of Congress, is whether TV
7 Marti is actually being viewed in Cuba. Two
8 reasons for low viewership are, one, the
9 ratification by both the United States and Cuba
10 of the International Telecommunications
11 Convention which requires that TV stations be
12 established so as not to interfere with other
13 nations' broadcasts. To comply with this treaty
14 US broadcasts in Cuba must be scheduled from 3:30
15 a.m. to 6 a.m.; and, two, the constant and
16 effective jamming of the broadcasts by the Cuban
17 government."

18 Do you agree that that, that those two
19 things taken together constitute a fundamental
20 concern for many observers including members of
21 Congress?

22 A. I don't know, sir.

23 Q. You don't know. Okay.

24 Do you recall that there was a task
25 force, President's task force on US government

1 two recommendations regarding the Advisory Board
2 for Cuba Broadcasting. First, the panel
3 recommended that the chairperson and members of
4 the Advisory Board be rotated every three years,
5 and the USIA director endorsed this
6 recommendation in his response.

7 "USIA Director Duffey noted that
8 there has not been significant turnover of the
9 board. He noted that under three administrations
10 just 14 people have served on the nine-member
11 board, but the director also pointed out that the
12 terms of all the board members will be up this
13 year."

14 Were you aware that this
15 recommendation had been made?

16 A. Yes.

17 Q. Did you agree with it?

18 A. It is not for me to agree or not. The
19 one who has to agree or disagree is the President
20 of the United States who appoints those
21 individuals.

22 Q. I understand. But you are the
23 chairman of the advisory board. Did you have a
24 position on this?

25 A. Yes, I do have a position. That is

1 different.
 2 Q. What is the position?
 3 A. The position is that everybody should
 4 serve at the pleasure of the President of the
 5 United States and that a final decision must rest
 6 in the White House and the President himself.
 7 Those are presidential appointments.
 8 Q. So your view is that rotation should
 9 be a matter left to the President?
 10 A. Yes, sir, the President should do it,
 11 the President should decide that.
 12 Q. Do you see any advantages to rotation
 13 as opposed to non-rotation?
 14 A. Same thing about terms in Congress and
 15 non-terms, same debate, beneficial or not, I
 16 think that this is up to the President of the
 17 United States and it should be, it should be the
 18 President of the United States who makes that
 19 decision. After all, those people are serving
 20 him and he is the one who appoints those people
 21 so that should be up to him.
 22 Q. But do you think that there are other
 23 persons qualified to be chairman of the advisory
 24 board?
 25 A. Oh, yes, sir, many.

1 the members of the board of directors, vote.
 2 A. No, the members of CANF, no, they
 3 don't vote, the members of the board of
 4 directors, 144, they vote.
 5 Q. Why is it that thousands of rank and
 6 file members don't get to vote on who is the
 7 chairman?
 8 A. Because those are the rules and
 9 regulations of that organization as any
 10 organization has their own rules and regulations.
 11 Q. What is the thinking behind that rule?
 12 A. That we want to be very democratic and
 13 we want that people vote every July and those
 14 people who are in the leadership position, they
 15 should all like their chairman, and that's what
 16 they do every year.
 17 Q. But under a democratic system wouldn't
 18 all the members vote rather than just the board
 19 members?
 20 A. Not necessarily. In every corporation
 21 it is the shareholders or the board of directors
 22 who appoint the officers, specifically the board
 23 of directors, and that's what the Foundation
 24 does. The board of directors votes
 25 Q. But a corporation is not a democracy, ✓

1 Q. What about the chairman of CANF?)
 2 Would there be other persons?)
 3 A. Absolutely; I am the least qualified)
 4 to be the chairman probably.)
 5 Q. No, I am, Mr. Mas.
 6 MR. CANTERO: No, I am.
 7 Q. The least qualified?
 8 MR. SCHWIEP: I will chair it.
 9 BY MR. OVELMEN:
 10 Q. The members of CANF as opposed to the)
 11 board of directors and trustees have never voted)
 12 on who should be chairman, is that correct?)
 13 A. Every year.
 14 Q. The members of CANF?
 15 A. Every year they vote in July. →
 16 Q. Are those the same as the directors?
 17 A. Yes.
 18 Q. The members?
 19 A. The members of the board of the Cuban
 20 American National Foundation, they vote every
 21 year on the election of new officers for the
 22 Cuban American National Foundation.
 23 Q. I am sorry, I am not making my
 24 question clear.
 25 I asked if the members of CANF, not

1 is it?
 2 A. Well, this is a corporation.
 3 Q. I see.
 4 A. It is a matter of opinion. I never
 5 see the members of the chamber of commerce, the
 6 hundreds of members electing the chairman. I am
 7 a member of the Greater Miami Chamber of
 8 Commerce, and I don't vote for the chairman. It
 9 is the executive committee and the board of
 10 directors that they have who elect the chairman.
 11 This is very American, this is very usual. What
 12 is unusual with it? Very democratic.
 13 Q. Do you think it would be a bad idea to
 14 let the members, rank and file members to vote
 15 for chairman?
 16 A. It would not but the problem is that
 17 it would be very complicated because we have
 18 250,000 members.
 19 Q. Well, I mean, there are --
 20 A. To organize an election of that nature
 21 would be a major, gigantic task.
 22 MR. CANTERO: He answered the
 23 question.
 24 BY MR. OVELMEN:
 25 Q. So your view is it isn't -- it is the

1 A. A year, year and a half, I don't know.
 2 Q. What was the substance of the first
 3 conversation you can remember?
 4 A. The unfair attitude of the political
 5 appointee of the Clinton administration, Marian
 6 Bennett, regarding Radio Marti. She is on a
 7 witch hunt and political persecution of those who
 8 do not agree with her political agenda. She is a
 9 very liberal leftist person.
 10 Q. All right, sir. Is it your view that
 11 she initiated this investigation?
 12 A. She has repeatedly said in public that
 13 she was going to get Radio Marti and Jorge Mas
 14 Canosa and that some way, somehow she was going
 15 to finish with Radio Marti.
 16 Q. And why --
 17 A. She is the same lady that leaked an
 18 "unconcluded" investigation to members of
 19 Congress at a time when the appropriation of that
 20 bill was taking place.
 21 Q. Did you ask for an investigation of
 22 this leak?
 23 A. Yes, I did.
 24 Q. And has that investigation been
 25 completed?

1 was prematurely leaked just to harm the process
 2 of the appropriation of Radio and TV Marti and
 3 everybody admits that. Even the Inspector
 4 General admitted that it was inconclusive
 5 investigation.
 6 Q. Well, it is just an interim report,
 7 right?
 8 A. No, there is not an interim report.
 9 It is the leaking of very inconclusive
 10 investigation.
 11 Q. Wasn't it intended that the
 12 investigation continue? I mean, it wasn't a
 13 final report, was it?
 14 A. It was leaking of a very inconclusive
 15 investigation. The one that took some headlines
 16 was an inconclusive investigation.
 17 Q. What further investigation was needed?
 18 A. Sure, the investigation was not
 19 concluded.
 20 Q. Well, I understand that. What are the
 21 parts that need --
 22 A. I don't know. I know that it was
 23 inconclusive and they all admitted that. I don't
 24 know what was required to finish but it certainly
 25 was not finished.

1 A. No, it is still going on. I asked
 2 that investigation publicly but the important
 3 thing is that many members of Congress requested
 4 and the investigation is going on.
 5 Q. I see.
 6 Why do you conclude she leaked
 7 anything?
 8 A. Because there is only one source of
 9 the investigation, that's the office of the
 10 Inspector General, and it ended up in the office
 11 of Congressman Skaggs who is an opponent of the
 12 appropriation of Radio and TV Marti.
 13 Q. So you think that the communication of
 14 the interim report to Congressman Skaggs was a
 15 leak?
 16 A. Sure, yes. Her deputy has said that,
 17 her own deputy, the deputy of the Inspector
 18 General, and said that she leaked it.
 19 Q. Why would it be important for
 20 Congressman Skaggs not to know about the interim
 21 report?
 22 A. Because Congressman Skaggs should read
 23 that statement together with all the other
 24 members of Congress once the statement, once the
 25 investigation is concluded. That investigation

1 Q. Wouldn't have been some of the things
 2 that needed to be done getting your testimony and
 3 Mr. Bonachea's?
 4 A. I don't know, sir, but I know it was
 5 inconclusive. I did not know what it takes to be
 6 a conclusive report, but my statement is that she
 7 illegally leaked an inconclusive report to one
 8 member of Congress.
 9 Q. Now, have you discussed the interim
 10 report with the Office of Cuba Broadcasting, with
 11 anyone in the Office of Cuba Broadcasting?
 12 (Pause.)
 13 A. What is your question? I think
 14 that --
 15 Q. That is all right.
 16 A. Just let me read here because this
 17 will, and I'm sorry, Rick, I did not --
 18 Q. It is all right, go ahead.
 19 A. I think that what I am going to read
 20 here will verify my previous statement.
 21 This is a letter from Marian Bennett,
 22 the Inspector General of the United States
 23 Information Agency, a political appointee, who is
 24 a very strong opponent of Radio and TV Marti, to
 25 Congressman David Skaggs, Democrat from Colorado,

Foot

1 MR. SCHWIEP: Yes, Linda was supposed
 2 to work that out.
 3 MR. CANTERO: I think she is.
 4 MR. SCHWIEP: I know she is trying to.
 5 MR. CANTERO: Yes.
 6 MR. OVELMEN: Could you mark this as
 7 our next exhibit, please.
 8 MR. CANTERO: Also, you know, from
 9 Tuesday's depo.
 10 MR. SCHWIEP: Exhibits?
 11 MR. CANTERO: Yes.
 12 MR. SCHWIEP: Yes, she knows. She will
 13 send those to you.
 14 That will be 161?
 15 MR. CANTERO: Yes.
 16 (Defendants' Exhibit 161 was marked for
 17 identification.)
 18 MR. CANTERO: Paul, is this from the
 19 recent production?
 20 MR. SCHWIEP: Yes.
 21 MR. CANTERO: That we haven't gone to
 22 see yet.
 23 MR. SCHWIEP: Yes. I think Cohen came,
 24 didn't he?
 25 MR. CANTERO: No, I don't think he's

1 understand it, a report, an interim report
 2 of the Inspector General investigating the
 3 Office of Cuba Broadcasting, known as the
 4 interim report.
 5 BY MR. OVELMEN:
 6 Q. So you have never seen the Inspector
 7 General's interim report?
 8 A. No, I haven't. I am not interested in
 9 that report. It is a political statement, that
 10 is not a report.
 11 Q. Did you participate in the
 12 investigation of the, by the Inspector General's
 13 office?
 14 A. No, sir, I have not.
 15 Q. Why is that, sir?
 16 A. Because I am waiting for the GAO to
 17 conclude the investigation on the Inspector
 18 General, then to make a decision if I, if I
 19 testify before the Inspector General or not.
 20 Q. Has the new legislation mooted this
 21 issue out or is it still a live issue?
 22 A. It is still there.
 23 MR. CANTERO: Objection. What new
 24 legislation?
 25 THE WITNESS: It is now in the State

1 gone yet, because he was on vacation last
 2 week.
 3 MR. SCHWIEP: Last I heard he was
 4 coming.
 5 MR. CANTERO: I notice it was a 1200 --
 6 12,000 number.
 7 MR. SCHWIEP: Yes.
 8 MR. CANTERO: It is a composite
 9 exhibit, this whole thing?
 10 MR. OVELMEN: I think it is all one
 11 exhibit.
 12 MR. SCHWIEP: It is all one exhibit.
 13 BY MR. OVELMEN:
 14 Q. My first question is going to be
 15 whether you have seen and are familiar with this
 16 document. Do you want to take a minute to just
 17 eyeball?
 18 A. You want me to read all these
 19 documents?
 20 Q. Don't read it, not yet.
 21 A. I never seen this document before.
 22 MR. CANTERO: For the record, this is a
 23 letter from USIA. And then the rest of it
 24 is attachments to the letter?
 25 MR. OVELMEN: Yes. This is, as I

1 Department.
 2 MR. OVELMEN: Okay, thank you.
 3 He knows more about this stuff than
 4 anyone.
 5 BY MR. OVELMEN:
 6 Q. Could you advise me of what your
 7 current relationship with Rolando Bonachea is?
 8 A. He is director of Radio Marti and I am
 9 the chairman of the advisory board. I have a
 10 very good professional relationship with
 11 Mr. Bonachea.
 12 Q. And are you in agreement with respect
 13 to the Inspector General report?
 14 A. No, I am not.
 15 Q. Have you discussed the Inspector
 16 General's report with Mr. Bonachea?
 17 A. Yes, I have.
 18 Q. When did you first talk to him about
 19 it?
 20 A. You know, I don't keep dates, you
 21 know, I don't have a log so I don't know when I
 22 talked first to him but I have talked to him
 23 about it.
 24 Q. Would it have been in the last year or
 25 earlier?

Page 1742

1 inefficiencies or the expense or the --
 2 A. My belief is that the directors are,
 3 the 144 directors of the Foundation, they elect
 4 every year the officers of the corporation and
 5 that's the proper thing to do. That's my
 6 opinion.
 7 Q. And how much of a contribution do the
 8 directors have to make to be a director?
 9 A. They have to contribute either their
 10 time or their money.
 11 MR. CANTERO: First of all, objection,
 12 asked and answered.
 13 Go ahead.
 14 THE WITNESS: And I already answered
 15 that in all the previous depositions.
 16 BY MR. OVELMEN:
 17 Q. All right, sir. We sure don't want to
 18 be repeating ourselves.
 19 "The second panel recommendation,"
 20 according to this report, "regarding the Advisory
 21 Board was that it should be a consultative body
 22 not involved in day-to-day broadcasting
 23 operations or in the recruitment or promotion of
 24 personnel. The USIA director supported the
 25 recommendation to limit the scope of the Advisory

Page 1743

1 Board and noted that the board already has a
 2 legislative mandate to work through appropriate
 3 channels.
 4 "The legislation provides that the
 5 board is to review the effectiveness of Radio
 6 Marti and make recommendations to the President
 7 and to director and associate director for
 8 Broadcasting of USIA."
 9 Do you agree with that recommendation.
 10 A. Well, what is it? You read a whole
 11 paragraph. Give me a specific question and
 12 repeat.
 13 Q. Do you agree with the proposal that
 14 the advisory board's power or scope be limited?
 15 A. I think it is very limited now.
 16 Q. This is a proposal to limit it
 17 further.
 18 A. No, I think that is limited enough
 19 now.
 20 Q. Okay, sir.
 21 The panel report made numerous
 22 recommendations to improve the broadcast
 23 standards of Radio and TV Marti. Are you
 24 familiar with those recommendations?
 25 A. No, I am not. You have to talk to the

Page 1744

1 director of Radio Marti who is familiar with
 2 that.
 3 Q. And these included clarifying
 4 editorial decisionmaking, broadcasting daily
 5 editorials, broadcasting corrections, working to
 6 balance broadcasts and others.
 7 You have never heard of any of these
 8 recommendations?
 9 A. What is your question?
 10 Q. Have you ever heard of these
 11 recommendations, are you familiar with them?
 12 A. I am not familiar with them, no. I
 13 probably heard them but I am not familiar with
 14 them.
 15 Q. All right, sir.
 16 Were you aware that the director of
 17 USIA agreed with the recommendation to rotate the
 18 chairperson and members of the Advisory Board for
 19 Cuba Broadcasting?
 20 A. What is your question?
 21 Q. Were you aware that the director of
 22 USIA agreed with the panel recommendation that --
 23 A. Yes.
 24 Q. -- the chairperson be rotated?
 25 A. Yes, yes.

Page 1745

1 Q. And did you respond to the director in
 2 any way?
 3 A. No, I didn't.
 4 Q. Were you aware that the director with
 5 respect to limiting the scope of the advisory
 6 board requested a review of the activities of the
 7 board?
 8 A. What is your question?
 9 Q. Were you aware -- I think we are
 10 getting near the end here, were you aware that
 11 the director wanted a review of the advisory
 12 board's activities with respect to the issue on
 13 limiting the scope of its activities?
 14 A. No, I was not.
 15 Q. Okay, sir.
 16 THE VIDEOGRAPHER: Excuse me,
 17 Mr. Canosa, your microphone.
 18 THE WITNESS: Oh.
 19 MR. OVELMEN: Just one minute.
 20 MR. CANTERO: While he is doing that,
 21 Paul, I still need the exhibits from the
 22 February 21, 20 and 21 depositions.
 23 MR. SCHWIEP: Okay.
 24 MR. CANTERO: I talked to your
 25 paralegal.

Page 1754

1 and Mrs. Marian Bennett said to Skaggs, "We can,
2 however, provide documents describing the issues
3 we have addressed to date and certain statements
4 from the Office of Cuba Broadcasting staff. We
5 request that you protect the confidentiality of
6 the information we are providing since we have
7 not completed the investigation. This
8 information is for future official use only and
9 its disclosure to unauthorized persons is
10 prohibited."

11 And you all know that this was
12 disclosed. It was disclosed to the press. It
13 was illegal to do what they did, Marian Bennett
14 and Congressman Skaggs or whatever members his
15 staff did it.

16 "Because of the nature and contents
17 of the material appropriate safeguards should be
18 used in granting access to the material."

19 Q. Now how do you know that Marian
20 Bennett is an opponent of Radio Marti?

21 A. She has said that and you only have to
22 read the statement of her own deputy.

23 Q. I am not clear, is she saying it or is
24 her deputy saying it?

25 A. The deputy has said that Marian

Page 1755

1 Bennett in many occasions has said that she was
2 going to one way or another end Radio Marti.

3 Q. End it?

4 A. End, end Radio Marti, finish the
5 program, finish the...

6 So that comes from her own deputy.

7 Q. But she is of course the Inspector
8 General, is she not?

9 A. She was.

10 Q. She was?

11 A. She was Inspector General. That
12 doesn't give her a right to go after a program
13 that has been established by law, approved by
14 Congress, appropriated by Congress for many years
15 and counts with the support not only from
16 Congress but also the President of the United
17 States.

18 Whatever title you might have does not
19 entitle you or whatever position you might have
20 does not entitle anyone to try to destroy a
21 program that has been established by law.

22 Q. Well, is it your perception that the
23 interim report would destroy Radio Marti?

24 A. It was an attempt to destroy Radio
25 Marti.

Page 1756

1 Q. Does anything in the report recommend
2 the termination of Radio Marti?

3 A. No, but by the fact that you try to
4 produce a scandal out of nothing, certainly that
5 assists and helps in preventing the appropriation
6 of funds to Radio and TV Marti.

7 No one is going to write a report
8 saying, Radio Marti should be finished and Radio
9 Marti should end because that is not the mission
10 of the Inspector General. But in this case they
11 can use and abuse the office just to try to harm
12 Radio and TV Marti.

13 Q. Well, the alternative explanation
14 could be that there were legitimate problems
15 there, couldn't it?

16 A. I don't think that anything that is
17 written there is legitimate, I think that all of
18 this is politically motivated.

19 Q. I thought you said you hadn't seen the
20 report.

21 A. Yes, but what I have read in the press
22 is --

23 Q. I didn't realize you put so much trust
24 in the press.

25 A. Yes, sure I do. Because the press

Page 1757

1 really excel, some members of the press, not all
2 the press, when they can said something against
3 Radio Marti, this is a political document, it is
4 a political statement. This is a political witch
5 hunt. And therefore I don't lend any credibility
6 whatsoever to that document or to whatever
7 Ms. Marian Bennett might do.

8 Q. And you reached that conclusion
9 without having reviewed it?

10 A. I have people who have reviewed the
11 statement, persons who have read the statement.
12 Dr. Bonachea, the director of Radio Marti, has
13 read the statement. My chief of staff of the
14 advisory board has read the statement. They have
15 written me memos about that.

16 I don't have to read that statement to
17 know that it is completely false. I rely not
18 only on the knowledge and research of my people,
19 but also what I have read in the press.

20 Q. So there are analyses that have been
21 written to you about the content of the report?

22 A. I don't usually read a document this
23 thick here so I rely on my staff to tell me what
24 is this all about and they have told me that this
25 is just, you know, a political statement which

1 has been confirmed by what the press has said.

2 Q. I have the misfortune of having to
3 read documents that thick.

4 A. You are an attorney, you are an
5 attorney, I am not.

6 You love to litigate, I love to
7 create. That's the difference.

8 Q. There may be differences.

9 A. It is a big, you know, big difference
10 between litigation and creation.

11 Q. I would agree.

12 MR. SCHWIEP: You can create litigation
13 as you do in this case.

14 THE WITNESS: But I have created Radio
15 Marti and TV Marti and the Cuban American
16 National Foundation and I have created a
17 large business and I have created a lot of
18 things.

19 BY MR. OVELMEN:

20 Q. I would stipulate that you are the
21 most creative person I have come across in a
22 lawsuit.

23 A. I love it. I am a builder. I do
24 that. And you people limited yourself to
25 litigate, which I think is a very legitimate

1 Q. Based on your press report?

2 A. I really don't recall.

3 Q. All right, sir.

4 Is it your recollection that one issue
5 is whether there have been alleged acts of
6 reprisal against OCB employees?

7 A. Yes, it is one, it is one of them.

8 Q. Have you reviewed the affidavits
9 submitted by those people who claim there has
10 been a reprisal against them?

11 A. No, but I have been informed of their
12 positions and their claims. If I have to read
13 everybody's affidavit involved with this problem
14 with Radio Marti I will spend most of my time on
15 it. And I spend very, very few hours a year on
16 Radio Marti. With the exception of the advisory
17 board meeting, I am just about never in touch
18 with Radio Marti.

19 You asked me the name of who is the
20 director of news and director of program, what
21 they do, who the people are, I can't answer you.

22 Q. Do you know who, which employees have
23 alleged acts of reprisal?

24 A. I know that Planas is one of them. I
25 don't know about the others.

1 career, unfortunately, but, we will be better
2 off.

3 MR. SCHWIEP: Drop this case, we will
4 do something else.

5 THE WITNESS: We will be better off
6 with less litigation and less problems.

7 MR. SCHWIEP: Drop this case.

8 THE WITNESS: I love this case. We
9 will take it all the way up to the end.

10 MR. CANTERO: I would be willing to go
11 into another line of work if all litigation
12 in the world ended tomorrow.

13 MR. OVELMEN: I wouldn't miss a beat.

14 BY MR. OVELMEN:

15 Q. Now, sir --

16 A. Come on, you can't live without it,
17 Rick.

18 MR. CANTERO: Try me, right.

19 THE WITNESS: Come on, come on.

20 BY MR. OVELMEN:

21 Q. Mr. Mas, all right, sir, now as I
22 understand the report, based on having read it,
23 it makes four different kinds of claims, is that
24 correct? Is that your understanding?

25 A. No.

1 Q. You don't know who the others are?

2 A. Olga Nazario and Richard Planas.

3 Q. Anyone else?

4 A. No -- yes, Bruce Sherman is another,
5 Bruce Sherman, a third one.

6 Q. Anyone else?

7 A. Not that I know of. Probably. I
8 haven't paid that much attention.

9 Q. Are you familiar with the allegations
10 that the persons alleging reprisal have made?

11 A. No, I am not familiar with the
12 details, sir.

13 Q. You seem to have drawn rather heroic
14 conclusions about the report having not read the
15 supporting affidavits.

16 MR. CANTERO: I object to the form.

17 THE WITNESS: No, I haven't read that.
18 I am not going to read the affidavit. I
19 don't need to read it.

20 MR. CANTERO: There is no question
21 pending so don't worry.

22 BY MR. OVELMEN:

23 Q. Do you attach more or less
24 significance to a sworn affidavit than someone
25 just talking?

Page 1762

1 A. No, I think sworn affidavits are very
2 important.
3 Q. All right, sir.
4 A. But I think, I don't have to read them
5 to know what is in a sworn affidavit.
6 Q. Are you aware that there is also an
7 allegation of misuse of government funds?
8 A. Probably is true, that allegation, but
9 I haven't paid too much attention to it.
10 I think that every money that has gone
11 to Radio Marti has been accounted for, isn't it?
12 Q. I don't think it is a question of
13 accounting. We will get to that.
14 No, I believe it is not money being
15 unaccounted for, as I understand the report,
16 based only on a review of it, it relates to money
17 being misallocated, used in ways that are not
18 authorized.
19 A. I don't know about that.
20 Q. You don't know about that?
21 A. I don't know, I am not involved in
22 that.
23 MR. CANTERO: Rick, can you tone down
24 your sarcasm when you ask questions.
25 MR. OVELMEN: I am sorry, I am tired.

Page 1763

1 What time is it anyway?
2 MR. CANTERO: 5:28.
3 MR. SCHWIEP: 5:30, still early.
4 BY MR. OVELMEN:
5 Q. I am sorry, Mr. Mas, I certainly don't
6 mean to be offensive.
7 Are you aware that there were
8 allegations of improper personnel practices?
9 A. Improper personnel practices, no, I am
10 not aware of that.
11 Q. Okay, sir.
12 Were you aware that there were
13 allegations of irregularities in broadcasts and
14 misleading news reports?
15 A. Yes, these have been the case, yes.
16 Q. Now, sir --
17 A. For some time.
18 Q. With respect to, say, that last class
19 of issues, have you reviewed or compared the
20 broadcasts that were made with the news reports
21 they purported to be presenting?
22 A. I know that the news are presented by
23 Radio Marti are very objective, very in balance,
24 very credible and I can assure you that that is
25 the case because every month in that board of

Page 1764

1 director or that advisory board we go through the
2 whole motion for a full day, reviewing that.
3 So I find all those allegations to be
4 untrue.
5 Q. All right, sir. When you go through
6 this for a full day, do you listen to tapes of
7 the broadcasts?
8 A. No, but I --
9 Q. Do you compare the tapes of the
10 broadcasts to the articles they purport to be
11 reporting on?
12 A. No, sir, I don't.
13 Q. Is it possible you could be mistaken?
14 A. I don't think so.
15 Q. Wouldn't it be better to have actually
16 listened to the tapes and compared them to the
17 reports?
18 A. Not necessarily.
19 Q. Why is that, sir?
20 A. Because I rely on those people who
21 write the reports and offer those reports to the
22 board.
23 Q. But if the investigation is suggesting
24 that those people are not doing their job
25 properly, as chairman of the advisory board

Page 1765

1 wouldn't you have a responsibility to look into
2 that?
3 A. I already told you and answered that
4 question, I don't believe in that, in the
5 accuracy of that report.
6 Q. I understand, sir. I am trying to
7 understand why you don't. Could you please
8 explain why you don't feel it would be necessary
9 to look at the actual evidence?
10 A. The same answer, because I don't
11 believe in the accuracy and the truthfulness of
12 that report.
13 Q. So --
14 A. That's a political document. I mean,
15 I keep giving you the same answer. You keep
16 asking the same question, you will get the same
17 answer.
18 Q. I am not sure I am understanding your
19 position. Is your position that because
20 something is politically motivated it can't be
21 true?
22 A. Absolutely, in this case, yes, it is
23 politically motivated. It got nothing to do with
24 the truth.
25 Q. But if something is politically

1 motivated, it could be true, couldn't it?
 2 A. That is a general question and
 3 speculation. I am not going to answer that. But
 4 in this specific case here this is a political
 5 document, it doesn't relate absolutely to the
 6 truth.
 7 Q. But my question is how you managed to
 8 conclude that without having either reviewed the
 9 report or the sworn statements or the data on
 10 which it is based?
 11 A. Because after 15 years in Radio Marti
 12 and being involved in a full day review of Radio
 13 Marti on that advisory board as chairman, I know
 14 that there is no reprisal of Radio Marti. I know
 15 that nobody is after no one at Radio Marti. I
 16 know that the news and broadcasts are very
 17 accurate, very well balanced, very objective.
 18 So, and after learning the political
 19 agenda of this lady here, I don't have to read
 20 that report to know that every allegation there
 21 is untrue, especially when it was unethically and
 22 illegally, as they state here, she admits that,
 23 was illegally leaked to members of the press and
 24 to the public.
 25 Q. Would it be your view, for example,

1 of getting an answer I would like.
 2 A. Yes.
 3 Q. What I am asking for, though, is the
 4 basis for your view.
 5 A. I already stated, you know, I have
 6 been 15 minutes now answering the same question.
 7 Q. Is it your position then you would
 8 never have to review any detail or any specific
 9 charge in the interim report in order to evaluate
 10 it?
 11 A. If there ever be a serious charge, a
 12 serious accusation coming from reliable people I
 13 would be the first one to immerse on that and
 14 read everything and learn about it.
 15 But when there are political
 16 persecution by someone who is ideologically
 17 motivated to allege false things about Radio
 18 Marti, I don't have any interest whatsoever to
 19 get involved in that type of thing.
 20 Q. All right, sir.
 21 Do you know whether the master logger
 22 tapes for January broadcasts of Radio Marti were
 23 damaged?
 24 A. The what?
 25 Q. The master logger tapes.

1 that the Whitewater investigation because it is
 2 politically motivated can't be correct?
 3 A. I am not an expert on Whitewater.
 4 MR. CANTERO: Assumes it's politically
 5 motivated. Objection.
 6 MR. OVELMEN: I assume it is.
 7 THE WITNESS: I am not going to answer
 8 that question.
 9 BY MR. OVELMEN:
 10 Q. I am not sure I understand why you are
 11 not answering the question.
 12 A. I am answering the question very
 13 directly, very, very directly I am answering
 14 question.
 15 I am familiar with Radio Marti. I
 16 know the accuracy of the information of Radio
 17 Marti. I know there are no personnel reprisals
 18 at Radio Marti and this is a political document.
 19 How much more clearer do you want me to be?
 20 Q. What I am trying to get at is what is
 21 the basis for that position?
 22 A. What you are trying to get is an
 23 answer that you like and you are not going to get
 24 it.
 25 Q. Well, actually, Mr. Mas, I don't dream

1 A. I don't know anything about it.
 2 Q. So you don't know anything about that?
 3 A. No.
 4 Q. But you can conclude that an
 5 allegation relating to that would be meritless
 6 without knowing anything about it?
 7 A. It depends who makes the allegation.
 8 Q. I see. So in other words, if an
 9 allegation is made by someone with a political
 10 motivation, you would discount it completely?
 11 A. It depends who makes the allegation is
 12 my answer. It depends who makes the allegation.
 13 Q. Well, for example, let's take
 14 Mr. Bruce Sherman. Would you dismiss any
 15 allegations he made?
 16 A. Yes, I will.
 17 Q. Why is that?
 18 A. Because he's a disgruntled employee --
 19 Q. I guess the question --
 20 A. -- who has a personal problem with the
 21 director of Radio Marti and with the management
 22 of Radio Marti.
 23 Q. I guess the question is whether or not
 24 he would have a right to be disgruntled, isn't
 25 it?

Page 1770

1 A. He has many rights but I have a right
 2 to believe that those who I want to and also who
 3 I believe should be credible or not. That's my
 4 right. That's my prerogative and I don't believe
 5 in any accusation or allegation that Mr. Bruce
 6 Sherman might come forward with.
 7 Q. Do you believe people on the basis of
 8 whether you want to or on the basis of the
 9 evidence that is presented?
 10 MR. CANTERO: Objection,
 11 argumentative.
 12 THE WITNESS: On the evidence or the
 13 basis or character of the person presenting
 14 the accusation.
 15 BY MR. OVELMEN:
 16 Q. So you think Mr. Sherman's character
 17 is that he is a perjurer?
 18 A. I am not saying that, I am saying that
 19 I don't believe the allegation of Mr. Bruce
 20 Sherman.
 21 Q. Aren't you concluding he is a
 22 perjurer?
 23 A. I have to see whatever the allegation
 24 is and then I will tell you if it is true or if
 25 it is untrue. To characterize him or to put a

Page 1771

1 label on him, that is not proper for me to do.
 2 Q. All right, sir, are you familiar with
 3 Mr. Sherman's reputation for veracity?
 4 A. For what?
 5 Q. For veracity, for truthfulness?
 6 A. No, I don't.
 7 Q. All right, sir.
 8 A. I don't think that he is truthful.
 9 Q. You are familiar with his reputation?
 10 A. No, I am not.
 11 Q. You are not, but you say you don't
 12 think he is truthful?
 13 A. In the allegation that he has been
 14 making, no.
 15 Q. What is that allegation?
 16 A. There has been reprisal against
 17 personnel in Radio Marti and that I exercised
 18 influence in the operations of Radio Marti. That
 19 is not true.
 20 I am not going to call him names. I
 21 never call anyone names, but to that allegation
 22 that he has made is not true. I do not exercise
 23 influence in the daily operations of Radio Marti.
 24 THE WITNESS: Are you going along all
 25 right with my English?

Page 1772

1 Rick, come on, get on it until tomorrow
 2 morning. Let's get it overwith. You are
 3 picking up a lot of steam now, especially
 4 with that last line, your eyes dropped.
 5 BY MR. OVELMEN:
 6 Q. Mr. Sherman alleges in his affidavit,
 7 quote, "The specific reprisals I claim are that
 8 OCB management have, one, prohibited my
 9 attendance as a contributing management official
 10 at meetings of the President's Advisory Board for
 11 Cuba Broadcasting."
 12 MR. CANTERO: Page?
 13 MR. OVELMEN: This is page D 12234, or
 14 3 of 29.
 15 MR. CANTERO: Okay.
 16 BY MR. OVELMEN:
 17 Q. Has Mr. Sherman been allowed to attend
 18 meetings of the President's Advisory Board?
 19 A. He has attended some of them.
 20 Q. Has he been told he couldn't attend
 21 others?
 22 A. Yes. That's my prerogative, to invite
 23 people to the board and I have not invited him
 24 lately, no. I have invited him before but not
 25 lately.

Page 1773

1 Q. When was the last time you invited
 2 him?
 3 A. I don't remember.
 4 Q. Do you recall how many years it has
 5 been?
 6 A. No, I don't.
 7 Q. So he has been not invited, though,
 8 for a period of time?
 9 A. No, he has not been invited. I just
 10 invite very, very few people on Radio Marti.
 11 Those who are going just to provide the reports
 12 and discuss that with the board.
 13 Q. Okay.* He states --
 14 A. Anybody can attend the public meeting,
 15 it is a public session of the advisory board.
 16 And certainly Mr. Sherman and anyone can go to
 17 the advisory board meeting.
 18 Q. When is the next one?
 19 A. The next one probably next month. I
 20 haven't set up a date yet.
 21 Q. I will mark my calendar.
 22 A. Mark your calendar, Rick, and come
 23 forward. I will advise you to make whatever
 24 statement you want to make about Radio and TV
 25 Marti. We would be honored and glad to have you

Page 1774

1 there.
 2 Q. And I would be honored to be there as
 3 well.
 4 A. Thank you, sir.
 5 Q. He next states that, quote,
 6 "repeatedly excluded me from management
 7 decisions for which I have had assigned
 8 authority."
 9 Do you know if that's true?
 10 A. I don't know. You have to ask
 11 management.
 12 Q. Okay. So you would have no knowledge
 13 of that.
 14 "Three, progressively diminished my
 15 official duties so as to deprive my position of
 16 any actual authority or responsibility."
 17 A. I don't know.
 18 Q. Okay.
 19 "Failed since July 1994, A, to
 20 provide me with a current position description
 21 with new duties to replace those denied me and,
 22 B, to provide me with a performance evaluation
 23 for the most recent period, 1993-94."
 24 A. I don't know.
 25 Q. So you don't know whether he was not

Page 1775

1 given a performance evaluation for that entire
 2 year?
 3 A. No, I don't have the slightest idea.
 4 Q. If that were true would you think that
 5 it was a problem?
 6 A. I don't know, sir. I am not familiar
 7 with those things, I am not an expert in that, I
 8 never handled that. I really don't have an
 9 opinion on that.
 10 Q. I see.
 11 "Five, allowed to exist a hostile
 12 work environment in which I have been the victim
 13 of libel, slander, intimidation and harassment."
 14 Do you know anything about that?
 15 A. No, I don't.
 16 Q. So of those five allegations, you
 17 really have knowledge of only one, is that
 18 correct?
 19 A. Which one?
 20 Q. Being invited or not invited to the
 21 President's Advisory Board?
 22 A. Right, that's the one that concerns
 23 me, goes under my purview.
 24 Q. All right, sir.
 25 Mr. Sherman's affidavit contains pages

Page 1776

1 and pages of individual incidents and I take it
 2 you are not aware of what any of those would be?
 3 A. No, no.
 4 Q. And would have no reason to know, is
 5 that correct?
 6 A. Right.
 7 Q. But you are prepared to conclude that
 8 they would be meritless, is that correct?
 9 A. If I have to judge his additional
 10 allegations by what he has said about me, I would
 11 have to conclude that they are untruthful.
 12 Q. But sitting here today you haven't
 13 reviewed any of those allegations or those
 14 instances?
 15 MR. CANTERO: Objection, asked and
 16 answered.
 17 MR. OVELMEN: All right, sir.
 18 THE WITNESS: Remember, we got a deal,
 19 Rick. I was going to answer you that
 20 question but I was not going to be
 21 repetitive any more. So let's stick to it.
 22 I know you are tired, you don't recall
 23 that you just asked that question before,
 24 so...
 25

Page 1777

1 BY MR. OVELMEN:
 2 Q. Sometimes you get a different answer
 3 when you ask the same questions twice, as I think
 4 we saw this morning.
 5 A. Come on.
 6 MR. CANTERO: Objection, move to
 7 strike.
 8 MR. OVELMEN: Okay.
 9 BY MR. OVELMEN:
 10 Q. Kristin A. Juffer, do you know who
 11 that is?
 12 A. Yes.
 13 Q. Who is she?
 14 A. She used to work at Radio Marti in, in
 15 audience research.
 16 Q. Are you aware of what her allegations
 17 are in this investigation?
 18 A. No, I don't.
 19 Q. You don't know what she is claiming
 20 one way or the other?
 21 A. No, I don't.
 22 Q. And you have no basis other than the
 23 basis you have stated already on the record for
 24 concluding one way or the other whether she is
 25 correct in her claims?

Page 1778

1 A. I don't know.
 2 Q. Are you familiar with her reputation
 3 for truthfulness?
 4 A. No, I don't.
 5 Q. Have you had any discussion with
 6 anyone regarding her allegations?
 7 A. No, I haven't.
 8 Q. You have not talked to Mr. Bonachea
 9 about her allegations?
 10 A. No.
 11 Q. So in his discussions with you about
 12 summarizing the interim report and so forth, he
 13 has never discussed her claims?
 14 A. No.
 15 Q. She states specifically, "I believe
 16 that the retaliation was a direct response for
 17 having provided audience research data showing
 18 declining audiences for Radio Marti and
 19 nonexistent audiences for TV Marti to OCB's
 20 senior management. Until this point there had
 21 never been any question about research data or
 22 the research reports by Navarro or Bonachea. At
 23 this point, however, I began to receive numerous
 24 questions about the surveys and heard numerous
 25 excuses about the data.

Page 1779

1 "To my surprise, Bonachea then
 2 instructed that the information from the surveys
 3 not be reported, printed or distributed to anyone
 4 inside or outside of USIA. This was the first
 5 time in almost five years of research work that
 6 there had been a reluctance to accept the results
 7 of the surveys."
 8 MR. CANTERO: Page?
 9 MR. OVELMEN: This is all on pages --
 10 THE WITNESS: What is your question.
 11 MR. OVELMEN: D 12262 to 12263.
 12 BY MR. OVELMEN:
 13 Q. Were you aware of her research as to
 14 the audiences?
 15 A. Yes, she was in charge of audience
 16 research.
 17 Q. And you were you privy to her data
 18 showing declining audiences for Radio Marti and
 19 nonexistent audiences for TV Marti?
 20 A. Yes, yes, I was.
 21 Q. Did you have any basis for questioning
 22 that research?
 23 A. No.
 24 Q. Did you find anything wrong with that
 25 research?

Page 1780

1 A. We discussed that at the board.
 2 Sometime there was a declining audience and
 3 sometimes it would go up, just normal in any
 4 radio station.
 5 Q. I think the affidavit says it was
 6 nonexistent audience for TV Marti. Do you
 7 remember that?
 8 A. Yes, but that's not accurate.
 9 Q. What is not accurate?
 10 A. That there's a nonexistent audiences
 11 for TV Marti. There is a small audience, there
 12 is a small audience in Cuba.
 13 Q. But did she produce data that showed
 14 that it was nonexistent for some period?
 15 A. No, I don't recall that.
 16 Q. Do you recall anyone questioning the
 17 veracity or the technique used in her data?
 18 A. No, I don't. That's a problem for all
 19 operations, daily operations. I don't get
 20 involved in that, I get involved in the final
 21 result bottom line. There is an audience or
 22 there isn't an audience.
 23 If she has stated there is no audience
 24 for TV Marti, it is not accurate. There is an
 25 audience for TV Marti too.

Page 1781

1 Q. How do you know that?
 2 A. Just the reports, people that come
 3 from Cuba every day, people you talk on the
 4 telephone, people who tell you that they watch TV
 5 Marti, certain segments of Havana, they watch
 6 that on the dishes, the officials of the
 7 government come down to satellites. I don't have
 8 to, somebody tell me what I already know from
 9 this source.
 10 Q. But do you know what she meant by
 11 nonexistent audience?
 12 A. I don't know.
 13 Q. Did she mean like a really minimal
 14 audience?
 15 A. No, I don't.
 16 Q. And you never looked into her
 17 allegations?
 18 A. No, no, I don't.
 19 Q. She says that "These surveys have, to
 20 my knowledge, been withheld for the past two and
 21 a half years and OCB management, I believe, has
 22 taken steps to conceal the results of the
 23 surveys. In addition, I was removed as director
 24 of audience research."
 25 Do you know anything about that?

1 A. No, I don't.
 2 Q. Do you have any reason to believe her
 3 statement is perjury?
 4 A. No, sorry, I don't.
 5 Q. If it were true would you --
 6 A. I don't handle that, Rick, you know.
 7 Just you are asking me questions that I don't
 8 know anything about it because I don't handle
 9 those day to day operations and personnel
 10 decisions. That is up to the management of Radio
 11 Marti.
 12 Q. I see.
 13 I would point out for the record that
 14 she attaches some of the studies and data.
 15 Do you know who Stuart H. Lippe is,
 16 L I P P E?
 17 A. Yes, sir.
 18 MR. CANTERO: Page?
 19 MR. OVELMEN: This would be D 12284.
 20 MR. SCHWIEP: He pronounces it "Lippe",
 21 doesn't he?
 22 MR. OVELMEN: Lippe.
 23 THE WITNESS: Yes.
 24 BY MR. OVELMEN:
 25 Q. Do you know him?

1 right, sir?
 2 "To gather and disseminate accurate,
 3 timely and relevant information and balanced
 4 perspectives on Cuba developments for use by
 5 Radio Marti in fulfillment of Public Law 98-111.
 6 "To recommend issues and ideas,
 7 involving and related to Cuba; provide
 8 information and data about Cuba that can be
 9 utilized to collaborate as appropriate in the
 10 development of programming.
 11 "To advise the station's leadership
 12 and other elements of Radio Marti on the context
 13 and possible significance of events in or about
 14 Cuba.
 15 "To extend Radio Marti's knowledge
 16 about Cuba through interaction with the many
 17 experts and sources outside Radio Marti including
 18 the US government, public and private groups, and
 19 others with an interest in Cuba."
 20 Does that sound right to you?
 21 A. No. The last part I disagree, I don't
 22 think that we should be in the business of
 23 educating the government of the United States on
 24 Cuba. Research should be limited to research.
 25 And there is an overlapping

1 A. Yes, I know who he is.
 2 Q. Have you met him personally?
 3 A. Yes.
 4 Q. What does he do?
 5 A. He's the director of research of Radio
 6 Marti.
 7 Q. All right, sir.
 8 Do you know what his allegations are?
 9 A. No, sir.
 10 Q. Have you ever thought it would be
 11 worth finding out why the director of research
 12 would be making allegations against the operation
 13 of Radio Marti?
 14 A. No, sir.
 15 Q. All right, sir.
 16 What is your understanding of the role
 17 of the research department?
 18 A. Of the role of the research
 19 department?
 20 Q. Yes.
 21 A. Research issues of concerns to Cubans
 22 that could be developed into important data for
 23 news and programs.
 24 Q. Let me read you from his affidavit and
 25 see if you would agree with his statement, all

1 description there also because many of the news
 2 and the department and the program department is
 3 in charge of investigating those issues that
 4 might help them formulating the programs. And
 5 the cost of the research department is
 6 tremendous, millions of dollars there in the
 7 research department. That's why we concluded
 8 with the recommendation of management to reduce
 9 the research department.
 10 Q. I think I may have read the last one
 11 too quickly for you.
 12 It reads, "To extend Radio Marti's
 13 knowledge about Cuba through interaction with the
 14 many experts and sources outside Radio Marti
 15 including the US Government" and others. In
 16 other words --
 17 A. What is your question?
 18 Q. In other words, it is not saying that
 19 the role of Radio Marti is to educate the US
 20 government.
 21 A. But it is to interact with others
 22 outside Radio Marti, I don't agree with that.
 23 Q. It says, to provide information, it
 24 can draw, to get the information for broadcasts,
 25 it can draw on all sources that are experts

Page 1786

1 including perhaps governmental sources who are
 2 experts.
 3 A. What is your question?
 4 Q. Do you agree with that?
 5 A. No, I don't.
 6 Q. Okay.
 7 Now, as I understand the allegations
 8 of this affidavit, he states that, quote,
 9 "Enormous political pressures are being brought
 10 to bear on OCB and USIA Director Duffey to move
 11 Radio Marti to Miami and abolish the research
 12 department, giving credence to the theory that
 13 this is an effort to consolidate control over the
 14 station before creation of the International
 15 Broadcasting Board, which is expected to exercise
 16 a more professional oversight of all US
 17 international broadcasting. Such oversight could
 18 be expected to improve Radio Marti, but at the
 19 expense of outside manipulation and a potentially
 20 diminished role for the Presidential Advisory
 21 Board.
 22 "The proposed move to Miami and the
 23 RIF's seem part and parcel of an effort to
 24 counter this pending development."
 25 Do you agree with that?

Page 1787

1 A. No.
 2 Q. And what is, do you have an
 3 understanding of the reputation for truthfulness
 4 of Mr. Lippe?
 5 A. No, not one way or the other, no.
 6 Q. Okay.
 7 And your view is that the research
 8 department is too expensive for what it provides?
 9 A. For the product that they put out.
 10 Q. I see. How is Radio Marti now going
 11 to or would it conduct its research without the
 12 research department?
 13 A. You don't find research department on
 14 radio stations, on commercial radio stations. I
 15 think that the news and program departments of
 16 Radio Marti have enough expertise to conduct
 17 their own research.
 18 Q. Do you see Radio Marti as being an
 19 ordinary radio station?
 20 A. No.
 21 Q. But you don't think that it would
 22 require a research department?
 23 A. Yes.
 24 Q. All right, sir.
 25 Who is Bruce Boyd?

Page 1788

1 (The witness and his counsel confer
 2 off the record.)
 3 A. Chief of personnel, personnel
 4 director.
 5 Q. And are you familiar with his
 6 reputation for truthfulness?
 7 A. No.
 8 MR. CANTERO: Page?
 9 BY MR. OVELMEN:
 10 Q. Have you reviewed his affidavit?
 11 A. No.
 12 Q. We are going to be look at D 12311.
 13 The affidavit says, "During that same
 14 time, Betancourt told me that Mas Canosa was
 15 becoming increasingly concerned about the extent
 16 of the news coverage he was receiving from Radio
 17 Marti, specifically wanting more coverage. It
 18 was also apparent that Betancourt would not yield
 19 to Mas Canosa and he was adamant about keeping
 20 the Miami politicals from using Radio Marti for
 21 their own agenda, including Mas Canosa.
 22 Betancourt also felt it was inappropriate for
 23 Radio Marti managers, including himself, to be on
 24 the air, though he was once, I believe, the
 25 person who conducted an interview of President

Page 1789

1 Reagan."
 2 Do you agree with this version of the
 3 threat to Mr. Betancourt?
 4 A. No.
 5 Q. And I take it you are not then
 6 familiar with any other allegations or statements
 7 made in Mr. Boyd's affidavit?
 8 A. What?
 9 Q. You are not familiar with anything
 10 else in Mr. Boyd's affidavit?
 11 A. No.
 12 Q. You don't know what else is alleged.
 13 Have you discussed Mr. Boyd's
 14 affidavit with anyone?
 15 A. No.
 16 Q. Have you discussed his allegations
 17 with anyone?
 18 A. No.
 19 Q. Do you know who Joseph Bruns is?
 20 A. Yes.
 21 Q. And what is his role?
 22 A. He's a high official at the United
 23 States Information Agency.
 24 Q. Do you know what his reputation for
 25 veracity would be; do you think he is politically

Page 1790

1 motivated?
 2 A. No, he is not. He is an honest man,
 3 very professional, many years in the USA.
 4 Q. So your view would be he would be an
 5 honest man?
 6 A. Yes.
 7 Q. Were you aware his affidavit said for
 8 many years there have been questions raised
 9 concerning the balance of news programming, some
 10 founded, some without foundation?
 11 A. Yes, I agree with that.
 12 Q. That's enough for this, I think.
 13 Now, as chairman of the advisory
 14 board, then is it not within your scope of
 15 authority to review or be concerned about
 16 personnel practices?
 17 A. The question that you ask me, I am
 18 looking back, I was not reading when you asked
 19 that question, it says some founded, some without
 20 foundation, I do not agree with the statement of
 21 some founded.
 22 Q. I see.
 23 A. Okay.
 24 Q. Thank you.
 25 A. So you read that real quick.

Page 1791

1 Q. I am sorry, I didn't mean to.
 2 A. Because I wasn't looking at it.
 3 Q. I am surprised I am doing anything
 4 quickly now, but I apologize if I misled you.
 5 MR. OVELMEN: What time do we have?
 6 MR. CANTERO: 5:58.
 7 MR. OVELMEN: I am going to have to
 8 quit.
 9 THE WITNESS: Come on, Rick, you can go
 10 a couple more hours.
 11 MR. OVELMEN: I can't.
 12 MR. SCHWIEP: I can but he won't let me
 13 ask questions.
 14 MR. OVELMEN: I can't. This is it for
 15 me.
 16 THE VIDEOGRAPHER: We are off the
 17 record.
 18 (Witness excused)
 19 (Thereupon, at 6:00 p.m., the
 20 deposition was adjourned.)
 21
 22
 23
 24
 25

Page 1792

1 I, JORGE MAS CANOSA, do hereby certify
 2 that I have read the foregoing deposition and
 3 that the same is a true and accurate transcript
 4 of my testimony, except for attached amendments,
 5 if any.
 6
 7
 8
 9
 10
 11
 12
 13 The signature above of JORGE MAS CANOSA
 14 was subscribed and sworn to before me
 15 this day of , 1996.
 16
 17
 18
 19
 20
 21 Notary Public
 22 My commission expires:
 23
 24
 25

Page 1793

1 CERTIFICATE OF OATH
 2
 3 The State of Florida)
 4 County of Dade)
 5
 6 I, the undersigned authority, certify
 7 that JORGE MAS CANOSA personally appeared before
 8 me and was previously duly sworn.
 9
 10 WITNESS my hand and official seal this
 11 10th day of June, 1996.
 12
 13
 14
 15
 16 RICHARD BURSKY, CM, RPR
 17 Notary Public - State of Florida
 18 My Commission No. CC 379312
 19 Expires: July 17, 1998
 20
 21
 22
 23
 24
 25

1 CERTIFICATE
 2 STATE OF FLORIDA)
 2 COUNTY OF DADE)

3
 4 I, Richard Bursky, a Registered
 5 Professional Reporter, do hereby certify that I
 6 was authorized to and did report said deposition
 7 in stenotype; and that the foregoing pages,
 8 numbered from 1422 to 1791, inclusive, are a true
 9 and correct transcription of my shorthand notes
 10 of said deposition.

11 I further certify that I am not an
 12 attorney or counsel of any of the parties, nor am
 13 I a relative or employee of any attorney or
 14 counsel connected with the action, nor am I
 15 financially interested in the action.

16 The foregoing certification of this
 17 transcript does not apply to any reproduction of
 18 the same by any means unless under the direct
 19 control and/or direction of the certifying
 20 reporter.

21 Dated this 10th day of June, 1996.

22
 23
 24 Richard Bursky, CM, RPR
 25

<p style="text-align: center;">-\$-</p> <p>\$10,000 [1] 1648:17 \$15,000 [1] 1631:19 \$25,000 [2] 1685:9.9 \$30,000 [1] 1647:19 \$300,000 [2] 1646:14 1650:16 \$5 [1] 1683:11 \$50,000 [2] 1683:9 1684:7</p> <hr/> <p style="text-align: center;">-'-</p> <p>'73 [3] 1621:24,25,25 '74 [1] 1632:19 '75 [1] 1631:16 '76 [5] 1630:5,12,13,14 1631:16 '80 [2] 1630:5,12 '81 [2] 1630:13,14 '83 [5] 1631:16 1661:7,8 1661:14,22 '84 [8] 1631:16 1661:5,5 1661:8,11,14,21,22 '85 [3] 1645:17 1660:25 1661:1 '86 [1] 1651:11 '89 [4] 1644:22,24,24 1651:14 '90 [1] 1644:7 '91 [1] 1644:23 'mierda [1] 1612:3</p> <hr/> <p style="text-align: center;">-0-</p> <p>02 [1] 1631:7</p> <hr/> <p style="text-align: center;">-1-</p> <p>1 [1] 1629:6 1/12/87 [1] 1648:19 1/12/89 [1] 1622:5 1/2/79 [1] 1634:12 1/20/89 [1] 1622:10 1/21/77 [1] 1640:2 1/22/90 [1] 1651:19 1/25/84 [1] 1627:10 10 [6] 1623:10 1626:1 1631:18 1725:14,15 1727:9 10,000 [2] 1623:5 1649:21 10/31/78 [1] 1620:14 10th [2] 1793:11 1794:21 11 [1] 1679:14 11292 [2] 1679:13,15 11293 [1] 1682:25 11295 [1] 1683:24 11301 [1] 1684:9 12 [1] 1662:1 12,000 [1] 1747:6</p>	<p>12/15/86 [1] 1649:23 12/18/86 [1] 1648:19 12/23/85 [1] 1647:9 1200 [1] 1747:5 12234 [1] 1772:13 12262 [1] 1779:11 12263 [1] 1779:11 12284 [1] 1782:19 12311 [1] 1788:12 13 [1] 1662:1 14 [1] 1737:10 1422 [1] 1794:8 144 [2] 1740:4 1742:3 15 [5] 1575:25 1623:10 1626:1 1766:11 1768:6 15,000 [1] 1649:21 153 [2] 1564:3,6 154 [3] 1610:21,22 1611:21 155 [2] 1611:5,7 156 [1] 1617:22 157 [1] 1654:21 158 [1] 1679:9 159 [1] 1691:1 16 [2] 1625:13 1652:5 160 [1] 1716:2 1600 [1] 1563:5 161 [2] 1746:14,16 1699 [1] 1563:12 17 [1] 1793:19 1791 [1] 1794:8 19 [1] 1660:24 1966 [2] 1669:11,22 1968 [1] 1632:21 1980s [1] 1678:24 1981 [2] 1621:21 1664:9 1982 [1] 1619:7 1984 [2] 1661:4 1709:22 1985 [1] 1660:23 1988 [1] 1720:23 1989 [5] 1702:8 1703:1 1711:23 1718:3 1727:2 1990 [2] 1690:5,17 1991 [2] 1644:21 1736:1 1993 [1] 1569:14 1993-94 [1] 1774:23 1994 [4] 1655:14 1690:8 1736:13 1774:19 1996 [5] 1562:12 1569:14 1792:15 1793:11 1794:21 1998 [1] 1793:19 1:15 [1] 1564:1</p> <hr/> <p style="text-align: center;">-2-</p> <p>2 [3] 1629:6 1650:14,15 2,000 [1] 1724:17 2/1/79 [1] 1634:12 2/11/81 [1] 1627:9</p>	<p>2/26/87 [1] 1652:12 2/7/77 [1] 1640:2 20 [10] 1623:22 1626:1,19 1643:21 1644:2 1647:19 1652:21,21 1724:16 1745:22 20,000 [3] 1638:3,3 1649:21 200 [3] 1630:24 1646:13 1724:17 21 [2] 1745:22,22 22 [4] 1580:10,12 1621:24 1729:3 233-6540 [1] 1684:11 24 [1] 1623:23 25 [3] 1592:7 1623:23 1638:3 250,000 [1] 1741:18 26 [1] 1601:9 2601 [2] 1562:11 1563:4 265-2822 [1] 1684:12 2699 [1] 1563:18 28 [2] 1591:19,23 29 [1] 1772:14</p> <hr/> <p style="text-align: center;">-3-</p> <p>3 [8] 1611:19 1612:1 1613:15 1629:6 1638:10 1650:14 1703:4 1772:14 3/1/78 [1] 1622:23 3/12/76 [1] 1639:7 3/13/80 [1] 1630:25 3/15/80 [1] 1631:1 3/17/71 [1] 1636:23 3/18/89 [1] 1642:13 3/29/76 [1] 1622:19 3/6/74 [2] 1628:11,12 3/7/79 [1] 1636:24 30 [3] 1652:21,21 1715:22 305-233 [1] 1679:24 305-667-2955 [1] 1684:11 33131 [1] 1563:13 33133 [2] 1563:6,20 35th [2] 1646:14 1650:3 36 [2] 1591:19,22 37 [1] 1625:14 379312 [1] 1793:18 3:30 [1] 1735:14</p> <hr/> <p style="text-align: center;">-4-</p> <p>4 [5] 1612:14 1613:16 1629:6 1708:10 1733:12 4/20/89 [2] 1654:6,8 4/22/81 [3] 1620:21 1621:23 1622:9 4/28/89 [2] 1651:6 1654:2 4/6/88 [1] 1653:11</p>	<p style="text-align: center;">-5-</p> <p>5 [5] 1629:6 1631:18 1655:14 1708:10 1714:13 5/21/84 [1] 1624:11 5/22/78 [1] 1631:6 5/24 [1] 1638:24 5/24/79 [3] 1633:13 1637:21 1638:13 50 [1] 1683:2 50,000 [2] 1683:11 1685:10 53 [3] 1590:11,15 1591:1 54 [2] 1590:11,15 55 [1] 1591:21 5:28 [1] 1763:2 5:30 [1] 1763:3 5:58 [1] 1791:6</p> <hr/> <p style="text-align: center;">-6-</p> <p>6 [6] 1562:12 1689:19,20 1703:5 1730:23 1735:15 6/12/79 [3] 1624:10 1633:12,12 6/16/82 [1] 1640:7 6/17/76 [1] 1639:18 6/19/75 [1] 1626:23 6/28/77 [1] 1639:19 6/7/74 [2] 1651:18,24 6/8/82 [2] 1618:17 1640:6 60 [2] 1582:7,11 6540 [1] 1679:24 666-1075 [1] 1684:13 6:00 [4] 1562:12 1730:18 1730:19 1791:19</p> <hr/> <p style="text-align: center;">-7-</p> <p>7/15/76 [1] 1639:7 7/3 [1] 1626:23 7/30/76 [2] 1625:7 1626:15 7/4 [1] 1651:17 701 [1] 1563:11</p> <hr/> <p style="text-align: center;">-8-</p> <p>8 [7] 1661:4 1718:3 1720:23 1727:2 1733:3,3 1733:17 8/28/85 [1] 1648:2 8/31 [1] 1626:8 8/5/76 [1] 1625:8 89-2613 [1] 1716:11 8th [1] 1720:18</p> <hr/> <p style="text-align: center;">-9-</p> <p>9 [2] 1718:15 1720:23 94-2681-CIV-DAVIS [1] 1562:2</p>	<p>98-111 [1] 1784:5 9:12 [1] 1562:12</p> <hr/> <p style="text-align: center;">-A-</p> <p>a.m. [4] 1562:12 1703:5,5 1735:15 a.m. [1] 1735:15 Abbott [3] 1625:5 1649:15 1651:1 able [7] 1612:3 1616:5 1699:1,7 1711:17 1714:1 1715:5 abolish [1] 1786:11 above [3] 1562:21 1648:7 1792:13 abroad [1] 1665:23 absolutely [10] 1685:8 1685:11,13 1686:22 1698:2 1720:2 1721:15 1739:3 1765:22 1766:5 abuse [2] 1709:17 1756:11 academic [1] 1693:8 accept [3] 1578:22 1693:6 1779:6 access [2] 1711:19 1754:18 accessibility [7] 1657:1 1657:12,25 1658:14,18 1659:4,15 accommodate [3] 1730:4,16 1732:13 accommodating [1] 1730:7 accomplish [1] 1612:13 according [2] 1734:1 1742:20 accounted [1] 1762:11 accounting [1] 1762:13 accuracy [3] 1765:5,11 1767:16 accurate [19] 1582:3,6 1611:16 1613:4,9,24 1615:14,15 1657:11 1674:13 1711:5 1725:25 1726:10 1766:17 1780:8 1780:9,24 1784:2 1792:3 accusation [5] 1699:22 1723:13 1768:12 1770:5 1770:14 Acosta [3] 1637:21,25 1638:12 acres [1] 1650:15 act [1] 1663:19 acting [4] 1576:20 1626:3 1626:5 1636:3 action [3] 1688:11 1794:14,15 activities [5] 1686:18 1702:11 1745:6,12,13 activity [1] 1702:20 acts [2] 1760:5,23 actual [3] 1729:8 1765:9</p>
---	--	--	--	--

<p>1774:16 adamant [1] 1788:19 addition [1] 1781:23 additional [1] 1776:9 addressed [1] 1754:3 addressing [1] 1582:10 adjourned [1] 1791:20 administration [7] 1579:1 1588:9,23,24 1661:16 1710:6 1750:5 administration's [1] 1588:5 administrations [3] 1662:12 1663:25 1737:9 admit [1] 1618:13 admits [3] 1698:1 1752:3 1766:22 admitted [2] 1752:4,23 ADORNO [1] 1563:3 advantages [1] 1738:12 advise [6] 1666:17 1695:10,22 1749:6 1773:23 1784:11 advisory [39] 1656:24 1657:23 1658:10 1659:9 1659:20 1660:1 1666:14 1666:15,25 1667:12 1668:14 1693:19 1694:1 1696:3 1709:22 1736:23 1737:1,4,23 1738:23 1742:20,25 1743:14 1744:18 1745:5,11 1749:9 1757:14 1760:16 1764:1 1764:25 1766:13 1772:10 1772:18 1773:15,17 1775:21 1786:20 1790:13 advocate [1] 1708:21 affidavit [26] 1652:12 1653:5,6 1697:6 1704:16 1709:15,23 1711:1,16 1712:17 1713:25 1760:13 1761:18,24 1762:5 1772:6 1775:25 1780:5 1783:24 1786:8 1788:10,13 1789:7 1789:10,14 1790:7 affidavits [3] 1760:8 1761:15 1762:1 afford [1] 1630:8 afield [2] 1586:8,9 Africa [1] 1596:15 AFTERNOON [1] 1563:25 again [20] 1587:17 1590:8 1626:21 1628:6 1631:6 1634:18 1636:9 1647:20 1648:19 1649:24 1664:22 1680:16 1682:16 1684:1 1684:9,22 1689:4 1695:4 1695:7 1723:5 against [12] 1595:1 1596:12,13,14 1675:1 1702:3 1709:6 1757:2 1760:6,10 1771:16 1783:12 agency [4] 1666:19</p>	<p>1687:6 1753:23 1789:23 agenda [4] 1592:8 1750:8 1766:19 1788:21 aggregate [1] 1649:19 ago [8] 1580:25 1603:11 1605:11 1619:21 1623:23 1626:19 1676:7 1731:15 agree [56] 1579:7,21,25 1580:5,6 1581:22 1583:3 1583:6 1586:11 1587:23 1592:15 1593:20,24 1601:14 1605:16 1607:23 1608:10,15,18,22 1616:25 1659:23 1660:7 1690:13 1702:14 1703:7,16 1704:5 1713:16 1714:9 1724:20 1725:2,3,10,12,20 1726:5 1727:8,16 1730:24 1732:22 1735:18 1737:17 1737:18,19 1743:9,13 1750:8 1758:11 1783:25 1785:22 1786:4,25 1789:2 1790:11,20 agreed [3] 1731:25 1744:17,22 agreement [6] 1625:1 1637:18 1639:6,9 1640:1 1749:12 agrees [2] 1586:10 1593:5 ahead [9] 1572:22 1574:19 1582:23 1593:8 1599:16 1609:12 1611:20 1742:13 1753:18 air [7] 1609:17 1662:13 1662:23 1699:7 1705:10 1706:16 1788:24 aired [2] 1606:9 1709:25 airplanes [1] 1609:16 airport [1] 1712:16 Alan [2] 1687:1,2 Alberto [1] 1604:11 Aleman [1] 1645:12 alert [1] 1665:8 Alessi [2] 1631:21 1639:19 Alfredo [1] 1631:4 allegation [14] 1762:7,8 1766:20 1769:5,7,9,11,12 1770:5,19,23 1771:13,15 1771:21 allegations [17] 1761:9 1763:8,13 1764:3 1769:15 1775:16 1776:10,13 1777:16 1778:6,9 1781:17 1783:8,12 1786:7 1789:6 1789:16 allege [1] 1768:17 alleged [4] 1690:6 1760:5 1760:23 1789:12 alleges [1] 1772:6 alleging [1] 1761:10 allies [2] 1588:4,9 allow [1] 1575:18 allowed [2] 1772:17 1775:11</p>	<p>almost [1] 1779:5 alone [1] 1657:14 along [4] 1580:8 1592:9 1595:14 1771:24 aloud [1] 1571:23 alternative [4] 1581:18 1583:4,7 1756:13 always [6] 1597:24 1694:14 1702:2,3 1719:21 1730:4 Alzheimer's [3] 1672:20 1676:14,18 ambassador [2] 1685:22 1685:24 ambition [1] 1581:3 amendment [1] 1710:24 amendments [1] 1792:4 America [2] 1712:9 1734:5 American [31] 1576:15 1580:24 1593:19 1594:1 1597:13,15 1601:19,21 1603:24 1604:5 1607:2 1660:2 1664:7 1665:12 1666:8,10 1667:4,6 1668:5 1675:10,17,23 1687:17 1707:7,20 1712:15 1734:3 1739:20 1739:22 1741:11 1758:15 Americans [3] 1581:12 1612:6 1615:20 amicable [1] 1576:16 among [3] 1573:22 1688:7 1719:21 amongst [1] 1658:24 amount [3] 1598:6 1634:8 1649:20 analyses [1] 1757:20 Andrew [2] 1575:21 1656:9 Anglos [1] 1616:11 Ann [4] 1562:7 1563:16 1563:24 1575:20 answer [53] 1568:21 1571:2,5 1575:9 1585:23 1587:18 1599:3,9,18 1600:18 1604:3 1609:21 1612:2,23,25 1613:1,3 1614:15 1667:24,24 1680:16 1683:18 1686:21 1695:4,6,8 1707:12 1716:20 1717:10,17 1718:23 1719:1,9,25 1720:11,13,14 1721:5 1725:6 1727:4,19 1734:17 1760:21 1765:10,15,17 1766:3 1767:7,23 1768:1 1769:12 1776:19 1777:2 answered [25] 1587:15 1588:12,14 1599:12 1605:4 1607:14,19 1668:17 1671:9,14 1680:15 1685:18,19 1688:2 1694:24 1695:4 1707:6,14 1723:8 1724:9 1741:22 1742:12,14</p>	<p>1765:3 1776:16 answering [5] 1719:5 1767:11,12,13 1768:6 answers [1] 1721:16 anti-Castro [1] 1687:15 anxious [1] 1581:19 anybody's [1] 1701:13 anytime [1] 1728:1 anyway [3] 1576:11 1678:4 1763:1 apartment [2] 1635:3 1647:13 apologize [2] 1732:21 1791:4 apparent [1] 1788:18 APPEARANCES [1] 1563:1 appeared [1] 1793:7 appendix [1] 1716:6 applicant [1] 1698:4 applicants [1] 1697:17 apply [1] 1794:17 appoint [1] 1740:22 appointed [5] 1661:8,14 1663:8,14 1692:18 appointee [2] 1750:5 1753:23 appointment [2] 1661:21 1700:14 appointments [2] 1711:20 1738:7 appoints [3] 1663:16 1737:20 1738:20 appraisal [1] 1692:24 approach [2] 1597:12 1605:17 appropriate [5] 1596:2 1665:3 1743:2 1754:17 1784:9 appropriated [1] 1755:14 appropriation [4] 1750:19 1751:12 1752:2 1756:5 appropriations [1] 1711:20 approval [1] 1706:7 approve [1] 1705:20 approved [2] 1705:14 1755:13 April [1] 1575:25 Aragon [2] 1563:14 1604:12 Archives [4] 1679:19 1680:23,25 1681:9 area [1] 1649:12 argued [1] 1664:9 argumentative [1] 1770:11 arm [1] 1655:20 army [10] 1565:13 1569:7 1572:2,10,17,17 1574:14</p>	<p>1610:1,9 1686:8 arranged [1] 1700:15 article [13] 1586:9,11 1591:20 1598:20 1599:21 1611:22 1612:23 1614:20 1676:25 1687:8,20 1688:20 1729:9 articles [3] 1591:10,12 1764:10 aspects [1] 1674:6 aspire [1] 1665:5 assigned [1] 1774:7 assigning [1] 1647:10 assignment [2] 1646:20 1647:3 assistance [2] 1585:2 1596:25 assists [1] 1756:5 associate [3] 1569:11 1578:17 1743:7 associated [1] 1594:12 assume [4] 1593:5 1667:14 1723:5 1767:6 assumes [3] 1667:9 1673:10 1767:4 assuming [6] 1667:21 - 1726:4,9,11,14,15 assure [4] 1607:24 1614:10 1665:6 1763:24 Atlantic [2] 1623:17 1635:16 Atlantida [6] 1627:5,12 1629:7 1636:9 1637:8 1654:10 Atomic [1] 1623:17 attach [1] 1761:23 attache [2] 1685:22 1686:1 attached [4] 1691:17,21 1702:7 1792:4 attaches [1] 1782:14 attachment [1] 1692:5 attachments [1] 1747:24 attack [1] 1581:14 attempt [3] 1699:14 1706:20 1755:24 attempted [1] 1664:5 attempts [2] 1699:10 1700:12 attend [5] 1686:14 1712:21 1772:17,20 1773:14 attendance [1] 1772:9 attended [1] 1772:19 attention [7] 1570:4 1607:20 1657:7 1691:7 1735:2 1761:8 1762:9 attitude [2] 1723:7 1750:4 attitudes [1] 1594:8 attorney [14] 1597:19 1621:13,16,19 1624:23 1625:2 1637:10 1649:13</p>
---	--	---	---	---

1650:25 1704:6 1758:4,5 1794:12,13 attorneys [4] 1597:25 1624:22 1636:3,5 audience [19] 1657:1 1658:14 1659:3,14 1735:4 1777:15 1778:17 1779:15 1780:2,6,11,12,21,22,23 1780:25 1781:11,14,24 audiences [6] 1778:18 1778:19 1779:14,18,19 1780:10 August [6] 1655:14 1661:3 1727:25 1728:24 1730:25 1732:14 author [14] 1571:25 1577:2,4,18 1578:2,7,15 1579:18 1585:1,2,6 1587:2,3 1598:19 authority [5] 1709:17 1774:8,16 1790:15 1793:6 authorized [2] 1762:18 1794:6 available [2] 1607:4 1696:22 Avenue [3] 1563:11 1625:14 1639:25 aware [22] 1586:5 1600:8 1656:1 1687:1 1713:22 1733:19 1734:12 1736:24 1737:14 1744:16,21 1745:4,9,10 1762:6 1763:7,10,12 1776:2 1777:16 1779:13 1790:7 away [1] 1597:14	basis [15] 1574:10,15 1581:25 1601:16,22 1603:17 1606:8 1767:21 1768:4 1770:7,8,13 1777:22,23 1779:21 bathroom [1] 1715:22 Bayshore [3] 1562:11 1563:4,18 bear [1] 1786:10 beat [1] 1759:13 beautiful [2] 1635:15,16 became [5] 1652:1 1667:5 1699:5 1700:16 1708:19 become [3] 1581:4 1582:5 1588:16 becomes [1] 1616:8 becoming [2] 1589:1 1788:15 beg [1] 1607:5 began [3] 1578:14 1704:16 1778:23 beginning [7] 1580:12 1580:12 1587:22 1590:8 1697:9 1708:17 1709:5 begins [2] 1601:4 1718:15 behalf [9] 1563:2,9,16 1585:18 1626:5,6 1634:25 1636:4 1698:6 behind [2] 1718:17 1740:11 belabor [1] 1635:22 belief [2] 1580:8 1742:2 bells [1] 1631:8 belonged [2] 1597:21 1670:8 below [1] 1628:21 beneath [1] 1683:25 beneficial [1] 1738:15 Bennett [7] 1750:6 1753:21 1754:1,13,20 1755:1 1757:7 best [1] 1700:9 Betancourt [19] 1690:4 1690:8 1692:16 1696:9 1696:25 1700:23 1701:3 1701:25 1702:2,13 1703:10 1704:15 1708:14 1711:8 1713:11 1788:14 1788:18,22 1789:3 better [8] 1598:7 1607:20 1617:12,15 1647:8 1759:1 1759:5 1764:15 between [12] 1588:17 1589:12,19 1598:3 1622:4 1622:8 1631:15 1640:15 1666:24 1703:4 1720:6 1758:10 beyond [2] 1665:7 1731:2 bias [1] 1674:24 biased [3] 1577:13 1674:16 1675:1	biases [1] 1656:1 big [2] 1758:9,9 bill [6] 1597:11,18,22 1675:3,4 1750:20 biographical [2] 1565:11 1578:15 birth [1] 1668:2 Biscayne [2] 1631:1,7 bit [1] 1628:5 blank [1] 1708:2 Bloc [1] 1702:9 bloodshed [1] 1594:18 board [76] 1606:11,12 1656:24 1657:23 1658:10 1658:12 1659:9,20 1660:1 1660:4,15,16 1661:14,17 1664:1,17,20 1665:17 1666:5,6,7,8,9,13,14,15 1667:1,12 1668:14 1693:19 1694:1 1696:3 1709:22 1736:23 1737:1 1737:4,9,11,12,23 1738:24 1739:11,19 1740:1,3,18,21,22,24 1741:9 1742:21 1743:1,1 1743:5 1744:18 1745:6,7 1749:9 1757:14 1760:17 1763:25 1764:1,22,25 1766:13 1772:10,18,23 1773:12,15,17 1775:21 1780:1 1786:15,21 1790:14 board's [2] 1743:14 1745:12 boat [8] 1670:14,20,24 1671:3,18,20,21,21 body [1] 1742:21 Bonachea [7] 1749:7,11 1749:16 1757:12 1778:8 1778:22 1779:1 Bonachea's [1] 1753:3 book [2] 1583:24 1589:6 booklets [1] 1668:6 boring [1] 1636:14 bottom [5] 1611:19 1612:1 1613:15 1641:1 1780:21 bought [41] 1623:2,9,16 1624:3,8,9 1625:13,25 1626:19 1627:17 1629:12 1631:20,23 1634:16,17 1638:25 1640:11,15 1645:18,20,22,25 1646:8 1646:18,19 1647:14,18 1648:10,24 1649:1,3,8 1650:3,13,15 1651:9,9,10 1651:11 1653:14 1654:11 box [1] 1730:17 Boyd [2] 1697:15 1787:25 Boyd's [3] 1789:7,10,13 bragging [1] 1687:14 break [3] 1662:9 1668:23 1715:21 Breaking [1] 1582:3 breaks [1] 1703:24	breeze [1] 1635:16 Brickell [1] 1563:11 Bridge [2] 1670:18 1671:5 brief [2] 1723:18 1731:1 briefly [1] 1682:22 bring [2] 1728:19,20 broadcast [14] 1656:25 1657:11 1658:13 1659:3 1659:11 1687:10 1688:8 1699:8 1703:4 1718:3 1720:18,21 1733:20 1743:22 broadcasting [32] 1609:16 1655:13 1656:21 1656:25 1657:24 1659:9 1659:21 1662:8 1666:16 1666:20 1667:13 1668:14 1693:19 1695:12 1703:11 1703:22 1733:16 1735:4 1736:1 1737:2 1742:22 1743:8 1744:4,5,19 1748:3 1753:10,11 1754:4 1772:11 1786:15,17 broadcasts [22] 1579:2 1608:20,24 1657:2 1658:15,19 1704:17,19 1705:1 1734:2,15 1735:13 1735:14,16 1744:6 1763:13,20 1764:7,10 1766:16 1768:22 1785:24 brother [1] 1671:10 brothers [3] 1595:2 1677:19 1687:13 brought [4] 1685:7 1728:11 1734:22 1786:9 Bruce [8] 1697:15 1711:25 1761:4,5 1769:14 1770:5,19 1787:25 Bruns [1] 1789:19 build [4] 1633:24,25 1634:5 1652:24 builder [1] 1758:23 building [4] 1635:4 1647:14 1652:24 1682:2 built [1] 1652:18 bullet [1] 1576:13 BURLINGTON [1] 1563:17 Bursky [4] 1562:18 1793:16 1794:4,24 Bush [5] 1588:21,24 1589:9 1694:9 1712:22 Bush's [1] 1588:16 business [5] 1606:24 1703:25 1719:20 1758:17 1784:22 businesses [1] 1720:6 busy [1] 1732:15 buy [1] 1623:7 buying [1] 1632:1 buzzed [1] 1687:15	C [1] 1732:1 calendar [2] 1773:21,22 calls [2] 1633:5 1680:10 candid [1] 1616:22 candidates [1] 1698:7 CANF [17] 1592:19 1600:10,18 1601:12 1664:16 1665:1,16,19,21 1666:25 1668:1 1709:21 1739:1,10,14,25 1740:2 cannot [9] 1584:7 1595:22,25 1603:7 1621:19 1647:5,12 1656:5 1731:2 Canosa [41] 1562:4,15 1581:2 1601:7,11 1659:22 1664:5,9,10 1690:7 1693:18 1696:2 1697:9 1697:16 1698:6 1699:9 1700:15 1702:10 1705:13 1709:15 1711:3,16 1712:1 1712:18,20,23 1714:3 1715:7,10 1718:18,19 1719:16 1725:15 1745:17 1750:14 1788:14,19,21 1792:1,13 1793:7 Canosa's [1] 1701:7 CANTERO [148] 1563:7 1564:5,7,9,15 1565:14,18 1566:11,15 1568:4,8,11 1568:16,25 1569:23 1570:7,10 1575:3,8,19 1576:1 1579:16 1584:5 1586:7,14,17 1587:14 1593:2,9 1598:2,13 1599:15,17 1600:16 1605:3,5,10 1609:5,8 1610:21 1611:3,7,12,21 1613:15 1614:8 1621:20 1622:10 1628:10 1630:20 1633:3,5 1639:15 1641:3 1656:9 1666:14 1667:8 1667:17 1669:14 1671:12 1673:10 1678:2,7,9,11,18 1680:10 1681:16 1682:13 1685:17,24 1686:19 1689:7,24 1691:17,20 1692:4 1707:5,13,17 1710:14,20 1714:10,12 1714:17 1715:16 1716:1 1716:12 1717:22 1718:5 1718:11 1720:16 1721:3 1721:6,9 1725:9,14,16,23 1726:4,8 1727:7,15 1728:8 1729:7,12,15,21 1729:25 1730:13 1731:9 1731:16 1732:4,9,22 1739:6 1741:22 1742:11 1745:20,24 1746:3,5,8,11 1746:15,18,21,25 1747:5 1747:8,22 1748:23 1759:10,18 1761:16,20 1762:23 1763:2 1767:4 1770:10 1772:12,15 1776:15 1777:6 1779:8 1782:18 1788:8 1791:6 capacity [2] 1612:7 1665:7 capitalist [2] 1581:7
-B-			-C-	

<p>1582:25 cared [1] 1602:17 career [2] 1712:24 1759:1 carefully [1] 1691:10 Carlos [15] 1604:11 1618:6,18 1620:5 1621:11 1625:2 1636:6,7 1640:7 1640:19 1641:22 1647:1 1649:16 1651:1 1653:15 case [21] 1562:2 1577:7 1580:1 1590:2 1608:4,8 1640:22 1681:3 1698:8 1704:9 1716:8 1718:17 1756:10 1758:13 1759:3 1759:7,8 1763:15,25 1765:22 1766:4 cases [1] 1632:9 cash [1] 1685:10 Castro [26] 1576:21 1581:7,18 1583:1,4,7 1591:23,24 1595:12,13 1595:15,16,21 1596:3 1608:19,23 1612:14 1662:9 1664:12 1669:21 1669:24 1687:16 1704:17 1705:3,8 1720:7 Castro's [5] 1573:4,12 1581:14 1591:1 1687:12 CC [1] 1793:18 Cedras [1] 1596:13 centered [2] 1659:20,25 Central [2] 1712:9,15 cents [1] 1683:11 Cernuda [15] 1716:22,24 1718:16 1720:9 1721:3,6 1721:10,22,25 1722:8,17 1722:22,24 1724:4,15 Cernuda's [4] 1719:12 1720:3 1722:5 1724:16 certain [7] 1599:21 1674:6 1676:17 1695:13 1726:2 1754:3 1781:5 certainly [6] 1638:7 1675:9 1752:24 1756:4 1763:5 1773:16 CERTIFICATE [2] 1793:1 1794:1 certification [2] 1681:1 1794:16 certified [4] 1611:13,14 1721:19 1726:1 certify [4] 1792:1 1793:6 1794:5,11 certifying [1] 1794:19 chair [3] 1715:25 1716:1 1739:8 chaired [3] 1693:18,25 1736:14 chairman [35] 1659:22 1660:4,19 1661:23 1662:5 1662:21 1664:16,17 1665:16,17 1666:4,6,12 1666:25,25 1668:13 1696:2 1709:21,21 1731:8 1737:23 1738:23 1739:1</p>	<p>1739:4,12 1740:7,15 1741:6,8,10,15 1749:9 1764:25 1766:13 1790:13 chairperson [3] 1737:3 1744:18,24 chamber [2] 1741:5,7 chance [1] 1678:19 change [5] 1573:15 1638:6 1663:25 1683:22 1705:5 changed [2] 1708:20 1731:24 channeled [1] 1700:13 channcls [1] 1743:3 character [2] 1770:13,16 characterize [2] 1590:4 1770:25 charge [5] 1688:25 1768:9,11 1779:15 1785:3 Charlie [1] 1692:19 chart [1] 1661:2 Che [1] 1698:8 check [4] 1672:6 1691:25 1692:1,2 chicken [1] 1612:20 chief [2] 1757:13 1788:3 children [1] 1650:10 Chile [1] 1596:14 Chilean [5] 1685:22,24 1686:2,3,6 Christopher [1] 1634:13 church [14] 1623:2 1631:22 1632:15,17,20 1632:23 1648:7,11,22 1649:1,3,11 1650:20 1672:6 circumstances [1] 1668:11 cite [1] 1590:17 citizen [2] 1594:9 1597:20 citizens [1] 1597:13 Citrus [1] 1626:22 City [1] 1640:2 civility [1] 1712:24 civilized [1] 1594:8 claim [4] 1597:21 1663:23 1760:9 1772:7 claimed [1] 1690:7 claiming [2] 1698:15 1777:19 claims [8] 1664:13 1690:16 1697:17 1709:23 1759:23 1760:12 1777:25 1778:13 clandestine [1] 1686:18 clarifying [1] 1744:3 clashes [1] 1709:25 class [3] 1594:21,21 1763:18 clause [1] 1715:8 clear [12] 1576:25</p>	<p>1580:14 1590:8 1628:18 1676:20 1701:6 1702:22 1711:2 1713:25 1715:4 1739:24 1754:23 clearer [1] 1767:19 clientele [2] 1608:2,8 Clinton [3] 1579:1 1694:9 1750:5 close [1] 1700:25 closed [1] 1608:13 closely [1] 1620:25 clothes [1] 1597:2 CM [2] 1793:16 1794:24 Coconut [1] 1626:18 Cohen [1] 1746:23 Coja [1] 1707:23 collaborate [1] 1784:9 collapse [1] 1702:9 colleague [1] 1685:10 colleagues [1] 1728:7 College [4] 1565:13 1569:7 1610:1,9 colloquial [1] 1616:11 colloquialism [1] 1617:3 colonel [4] 1572:9 1574:14 1686:6,9 Colorado [1] 1753:25 coming [2] 1747:4 1768:12 comment [2] 1585:18 1587:12 comments [11] 1585:3,9 1585:10,14,21 1586:5,20 1586:22 1587:4 1591:21 1636:16 commerce [2] 1741:5,8 commercial [1] 1787:14 commission [2] 1792:22 1793:18 commitment [1] 1731:21 committee [1] 1741:9 committees [2] 1719:18 1720:4 communicate [2] 1666:1 1701:16 communication [3] 1589:18 1672:13 1751:13 communications [4] 1588:20 1699:24 1701:14 1711:7 communicative [1] 1665:25 communist [1] 1574:11 community [17] 1592:17 1593:19 1601:21 1603:24 1604:5,11 1607:2 1660:2 1675:2,8,10,17,23 1707:8 1707:11,20 1734:3 company [4] 1635:8 1636:1 1637:21 1640:8</p>	<p>compare [4] 1613:14 1660:17,17 1764:9 compared [2] 1763:19 1764:16 comparison [1] 1564:10 complete [1] 1610:3 completed [2] 1750:25 1754:7 completely [5] 1610:11 1714:6,8 1757:17 1769:10 compliance [1] 1733:20 complicated [2] 1618:10 1741:17 complied [2] 1697:20 1698:2 comply [1] 1735:13 composite [2] 1611:2 1747:8 composition [1] 1664:1 conceal [1] 1781:22 concept [3] 1662:8 1665:10 1702:25 concern [4] 1657:16 1665:22 1735:5,20 concerned [10] 1619:13 1628:20,23 1660:3 1674:24 1688:16 1704:12 1704:15 1788:15 1790:15 concerning [2] 1666:2 1790:9 concerns [7] 1656:19,22 1659:18,25 1705:12 1775:22 1783:21 conclude [8] 1642:14,17 1748:17 1751:6 1766:8 1769:4 1776:7,11 concluded [5] 1736:1 1736:15 1751:25 1752:19 1785:7 concluding [2] 1770:21 1777:24 conclusion [2] 1734:6 1757:8 conclusions [4] 1573:22 1574:3 1583:11 1761:14 conclusive [1] 1753:6 conditions [2] 1714:25 1715:1 conduct [2] 1787:11,16 conducted [3] 1601:24 1671:19 1788:25 confer [5] 1572:20 1574:22 1609:3 1692:10 1788:1 confidentiality [1] 1754:5 confirm [2] 1693:16 1713:20 confirmation [9] 1661:9 1661:11,13,15,19,21 1709:24 1710:3 1712:19 confirmed [8] 1661:3,7 1663:8 1695:19,19,23 1711:24 1758:1</p>	<p>conflict [5] 1666:24 1667:3,11,25 1668:1 conform [1] 1576:9 confrontation [1] 1596:21 confused [1] 1718:11 Congress [30] 1655:20 1655:23 1656:20 1657:6 1657:8 1659:10,13 1662:11 1679:19 1689:15 1695:11,13 1705:14,20 1710:4 1711:19 1719:19 1720:4 1723:2 1733:15 1735:6,21 1738:14 1750:19 1751:3,24 1753:8 1755:14,14,16 Congressional [5] 1655:10,18,21 1656:19 1656:22 Congressman [6] 1751:11,14,20,22 1753:25 1754:14 Congressmen [2] 1662:16 1706:11 connected [1] 1794:14 conscience [1] 1719:23 consent [1] 1695:22 conservative [1] 1664:4 consider [6] 1574:5,11 1599:2 1600:9 1604:4 1613:4 consideration [1] 1591:21 considered [1] 1603:22 considering [1] 1673:16 consistent [2] 1595:7 1597:7 consistently [1] 1692:23 consisting [1] 1597:1 consolidate [1] 1786:13 conspiracy [1] 1702:3 constant [1] 1735:15 constantly [4] 1603:16 1603:17 1607:22 1668:5 constitute [1] 1735:19 construction [6] 1637:21 1638:13 1652:1 1652:7,8 1653:2 construed [1] 1571:4 consul [2] 1686:2,3 consuls [2] 1686:4,14 consult [1] 1575:11 consultants [1] 1734:2 consultations [1] 1575:1 consultative [1] 1742:21 consulted [2] 1592:17 1593:19 contains [1] 1775:25 content [3] 1587:23 1687:25 1757:21</p>
---	--	---	--	--

contents [3] 1582:2 1586:8 1754:16	1668:3 1673:7 1692:20 1739:12 1759:24 1767:2 1775:18 1776:5.8 1777:25 1794:9	criticizing [1] 1724:11	D [10] 1640:24 1679:13 1679:15 1682:25 1683:24 1684:9 1772:13 1779:11 1782:19 1788:12	1643:8 1645:16 1646:15 1648:3,8,19 1649:23
context [1] 1784:12	corrections [1] 1744:5	critics [1] 1663:23	Dade [4] 1616:2 1621:6 1793:4 1794:2	deeds [6] 1618:17 1629:7 1637:20 1638:19 1639:2 1653:10
Continental [1] 1622:19	correspondence [1] 1682:18	CROCKETT [1] 1563:17	daily [3] 1744:4 1771:23 1780:19	defend [1] 1636:21
CONTINUATION [1] 1562:14	corresponds [1] 1612:24	CRS [5] 1655:25 1656:15 1689:14 1733:15 1736:24	damaged [1] 1768:23	DEFENDANT [2] 1563:9,16
continue [2] 1724:15 1752:12	corruption [1] 1723:10	CRS-15 [1] 1736:22	dangerous [1] 1573:20	Defendants [1] 1562:8
continued [1] 1699:10	cost [5] 1638:1 1647:15 1653:22 1709:17 1785:5	CRS-6 [6] 1656:14,16 1689:18,20 1732:25 1733:3	data [14] 1602:15,16,17 1602:18 1766:9 1778:17 1778:21,25 1779:17 1780:13,17 1782:14 1783:22 1784:8	Defendants' [8] 1564:3 1610:22 1654:21 1679:7 1679:9 1691:1 1716:2 1746:16
continues [1] 1701:3	Council [1] 1706:13	CRS-9 [1] 1735:2	date [12] 1576:5 1603:17 1624:11,18,19 1626:23 1627:10 1636:23 1727:1 1727:24 1754:3 1773:20	defender [1] 1636:16
continuing [1] 1576:16	counsel [8] 1572:20 1574:22 1575:1 1609:3 1692:10 1788:1 1794:12 1794:14	crudity [1] 1615:1	dated [31] 1618:17 1620:14,21 1622:4,5,9,19 1624:10 1626:8,15,23 1627:9 1633:12,12 1634:11 1637:20 1639:6 1639:18 1640:2,6 1642:12 1642:13 1647:9 1648:2 1649:23 1651:6,23 1653:11 1654:2 1655:14 1794:21	defense [4] 1572:2,11,18 1716:1
Contra [1] 1588:11	counter [1] 1786:24	Cuba [61] 1581:15 1582:15,17 1594:17,21 1595:2 1596:17 1597:1 1609:18 1612:6 1615:21 1616:8 1655:7,13 1656:22 1656:24 1657:15 1659:9 1659:21 1661:18 1662:8 1666:15,19 1667:10,12 1668:14 1671:19 1674:9 1674:10,17,21 1687:10 1693:19 1694:1 1695:12 1700:21 1703:4 1724:3 1724:23 1733:16 1734:3 1735:7,9,14 1737:2 1744:19 1748:3 1753:10 1753:11 1754:4 1772:11 1780:12 1781:3 1784:4,7 1784:8,14,16,19,24 1785:13	dates [3] 1618:12 1661:21 1749:20	define [2] 1600:24 1706:2
Contractors [1] 1672:13	countries [1] 1712:15	Cuba's [2] 1573:12 1605:18	David [1] 1753:25	defined [1] 1598:9
contradiction [3] 1697:13 1698:9,17	country [6] 1594:20 1595:1,4 1612:5,11 1615:18	Cuban [58] 1576:15 1580:24 1581:1,4,12 1582:5 1588:18 1589:12 1589:19 1592:17,18 1593:18,20 1594:1,11,18 1594:21 1595:2,3,8,22 1601:19,21 1602:19 1603:24 1604:5 1605:18 1607:2 1660:2 1662:19 1664:7,8,11 1665:12,23 1666:2,8,10 1667:4,6 1668:4,8 1675:10,16,23 1687:17 1695:15 1700:22 1707:7,19,20 1723:10 1724:2 1734:3 1735:16 1739:19,22 1758:15	Davis [1] 1626:22	definition [5] 1594:4 1598:20 1599:1,5 1600:25
contradictory [1] 1690:15	counts [1] 1755:15	Cuba's [2] 1573:12 1605:18	day-to-day [1] 1742:22	definitions [1] 1592:24
contradicts [2] 1699:12 1702:15	County [4] 1616:2 1621:6 1793:4 1794:2	Cuba's [2] 1573:12 1605:18	days [3] 1670:17 1699:13 1702:15	defusing [1] 1573:19
contribute [1] 1742:9	couple [10] 1592:11 1605:10 1619:23 1649:9 1650:15 1653:10 1670:17 1676:7 1688:5 1791:10	Cuba's [2] 1573:12 1605:18	De [2] 1640:13,24	delinquent [1] 1719:7
contributing [1] 1772:9	course [6] 1588:24 1635:21 1677:11 1697:23 1697:25 1755:7	Cuba's [2] 1573:12 1605:18	deal [14] 1607:7 1619:6 1624:2 1625:21 1627:19 1628:8,8,9 1637:4,14 1640:20 1645:14 1720:2 1776:18	delivering [1] 1581:9
contribution [7] 1570:15 1571:14 1572:14 1577:23 1594:25 1701:6 1742:7	court [10] 1562:1 1597:20 1707:25 1715:16,18 1716:6,8,16 1728:13,23	Cuba's [2] 1573:12 1605:18	dealing [1] 1689:15	demeanor [1] 1581:8
control [7] 1664:6 1671:21 1690:7,18,19 1786:13 1794:19	courts [1] 1597:16	Cuba's [2] 1573:12 1605:18	dealings [1] 1696:1	demeaning [1] 1703:13
controlled [1] 1615:20	coverage [9] 1601:7,11 1604:1 1607:7 1673:25 1674:10 1702:11 1788:16 1788:17	Cuba's [2] 1573:12 1605:18	dearly [1] 1709:17	democracy [4] 1573:21 1594:17 1596:22 1740:25
controversial [1] 1659:21	covered [8] 1601:18,20 1602:3,11,14,18 1604:21 1682:5	Cuba's [2] 1573:12 1605:18	debate [1] 1738:15	Democrat [1] 1753:25
controversy [1] 1657:10	covering [1] 1603:1	Cuba's [2] 1573:12 1605:18	debated [1] 1656:20	democratic [9] 1581:18 1583:4,7 1594:23 1595:7 1596:22 1740:12,17 1741:12
Convention [1] 1735:11	coy [1] 1691:25	Cuba's [2] 1573:12 1605:18	decide [1] 1738:11	denied [1] 1774:21
conventions [1] 1608:16	CR [1] 1689:19	Cuba's [2] 1573:12 1605:18	decision [7] 1673:14 1694:12,13 1700:17 1738:5,19 1748:18	deny [1] 1671:4
conversation [5] 1681:22,24 1682:7,22 1750:3	crap' [1] 1612:3	Cuba's [2] 1573:12 1605:18	decisionmaking [1] 1744:4	department [29] 1572:2 1572:2,10,11,17,18 1584:6 1603:6,7 1606:18 1606:18,21,22 1706:12 1721:1,10 1749:1 1783:17 1783:19 1785:2,2,5,7,9 1786:12 1787:8,12,13,22
conversations [1] 1693:13	create [3] 1665:9 1758:7 1758:12	Cuba's [2] 1573:12 1605:18	decisions [3] 1693:13 1774:7 1782:10	denial [1] 1774:21
convert [1] 1612:14	created [3] 1758:14,16 1758:17	Cuba's [2] 1573:12 1605:18	declared [3] 1577:14 1583:20 1718:16	depoliticize [2] 1579:1 1601:5
convey [1] 1590:5	creating [2] 1665:10 1668:11	Cuba's [2] 1573:12 1605:18	declining [3] 1778:18 1779:18 1780:2	depoliticized [5] 1579:9 1579:13 1580:2,4,7
conviction [2] 1693:15 1693:17	creation [6] 1668:2,10 1668:12 1673:23 1758:10 1786:14	Cuba's [2] 1573:12 1605:18	dedicated [1] 1701:4	depos [1] 1745:22
cooperate [1] 1727:4	creative [1] 1758:21	Cuba's [2] 1573:12 1605:18	deed [20] 1618:22 1620:14 1625:1 1628:25 1630:25 1634:11 1637:18 1638:13,23 1639:18 1640:6 1641:10 1642:13	deposition [24] 1562:14 1562:21 1567:3 1568:1 1575:2,21,22,23 1592:24 1598:7 1611:5 1617:22 1675:22 1676:10 1682:5 1683:17 1730:8 1731:5 1731:14,23 1791:20 1792:2 1794:6,10
copies [2] 1609:8 1697:1	credence [1] 1786:12	Cuba's [2] 1573:12 1605:18	dedicated [1] 1701:4	depositions [1] 1742:15
copy [10] 1564:7,13 1609:9 1680:20 1681:2,8 1715:17 1720:15 1721:19 1727:25	credibility [4] 1574:16 1607:25 1703:15 1757:5	Cuba's [2] 1573:12 1605:18	deed [20] 1618:22 1620:14 1625:1 1628:25 1630:25 1634:11 1637:18 1638:13,23 1639:18 1640:6 1641:10 1642:13	deprive [1] 1774:15
Coral [3] 1634:22 1635:23 1636:2	credible [3] 1608:5 1763:24 1770:3	Cuba's [2] 1573:12 1605:18	deed [20] 1618:22 1620:14 1625:1 1628:25 1630:25 1634:11 1637:18 1638:13,23 1639:18 1640:6 1641:10 1642:13	deputy [8] 1700:14 1751:16,17,17 1754:22
Corp [2] 1638:13 1645:14	critic [3] 1577:11 1583:20 1584:19	Cuba's [2] 1573:12 1605:18	deed [20] 1618:22 1620:14 1625:1 1628:25 1630:25 1634:11 1637:18 1638:13,23 1639:18 1640:6 1641:10 1642:13	
corporation [10] 1623:18 1633:21 1634:4 1634:23 1637:22 1646:2 1740:20,25 1741:2 1742:4		Cuba's [2] 1573:12 1605:18	deed [20] 1618:22 1620:14 1625:1 1628:25 1630:25 1634:11 1637:18 1638:13,23 1639:18 1640:6 1641:10 1642:13	
correct [34] 1578:9 1585:9,15 1592:3 1596:4 1604:23,25 1613:2,18,19 1613:21 1618:24 1622:14 1636:2 1661:12,24 1662:2 1662:25 1663:20 1664:18 1664:19 1665:18,25		Cuba's [2] 1573:12 1605:18	deed [20] 1618:22 1620:14 1625:1 1628:25 1630:25 1634:11 1637:18 1638:13,23 1639:18 1640:6 1641:10 1642:13	

<p>1754:24,25 1755:6 Descalzo [4] 1634:13,13 1634:14,17 describing [1] 1754:2 description [9] 1587:8 1592:22 1600:13 1647:2 1647:4,8,11 1774:20 1785:1 desire [2] 1581:4 1582:4 desk [1] 1680:19 despise [1] 1700:24 despite [1] 1705:11 destroy [3] 1755:20,23 1755:24 detail [6] 1564:10 1601:6 1603:8 1688:10 1689:5 1768:8 detailed [1] 1601:11 details [10] 1600:22 1609:19,20 1622:17 1688:9 1689:2,3 1733:23 1736:4 1761:12 determined [1] 1703:3 developed [5] 1573:20 1646:9,9 1662:7 1783:22 Developers [1] 1646:1 developing [1] 1665:10 development [5] 1646:16 1649:25 1651:10 1784:10 1786:24 developments [1] 1784:4 dialogue [9] 1595:10,11 1595:12,14,15,18 1596:2 1596:2,5 Diaz [1] 1669:22 dictator [3] 1581:20 1596:13,13 dictatorial [1] 1581:8 difference [2] 1758:7,9 differences [1] 1758:8 different [17] 1566:20 1576:6 1579:20,22 1581:17 1588:25 1593:6 1593:7 1598:20 1607:12 1607:12 1628:8 1675:19 1707:15 1738:1 1759:23 1777:2 differently [1] 1598:23 difficulty [1] 1670:23 dime [1] 1719:22 diminished [2] 1774:14 1786:20 diplomacy [1] 1596:16 direct [5] 1570:4 1718:3 1735:2 1778:16 1794:18 directed [1] 1706:14 direction [2] 1608:1 1794:19 directly [7] 1699:16 1702:23 1716:23 1720:2 1720:8 1767:13,13 director [4] 1574:14</p>	<p>1666:18 1687:5 1690:4 1692:19,20 1695:12 1698:21,21,24 1699:5 1700:14,16 1711:25 1734:7,13,18 1737:5,7,11 1742:8,24 1743:7,7 1744:1,16,21 1745:1,4,11 1749:8 1757:12 1760:20 1760:20 1764:1 1769:21 1781:23 1783:5,11 1786:10 1788:4 directors [13] 1666:7,8 1739:11,16 1740:1,4,21 1740:23,24 1741:10 1742:2,3,8 disagree [25] 1579:21 1581:24 1583:8 1588:1,3 1588:7,14 1605:17,21 1608:11,14,17 1609:2 1614:17 1615:25 1660:8 1664:25 1709:14,19 1713:24 1714:18,20 1715:10 1737:19 1784:21 disagreed [1] 1616:23 disagreeing [1] 1601:17 disagreement [2] 1582:1 1709:9 disclosed [2] 1754:12 1754:12 disclosure [1] 1754:9 discount [3] 1640:12,16 1769:10 discovered [1] 1583:23 discriminate [1] 1595:1 discuss [5] 1607:1 1658:11 1701:20 1709:10 1773:12 discussed [13] 1657:13 1659:16 1688:1,5,6 1706:15 1710:5 1749:15 1753:9 1778:13 1780:1 1789:13,16 discussion [6] 1657:18 1657:21 1717:23 1733:10 1736:11 1778:5 discussions [1] 1778:11 disease [3] 1672:21,24 1676:19 disgruntled [4] 1696:11 1698:16 1769:18,24 dishes [1] 1781:6 disinformed [1] 1610:11 dismiss [1] 1769:14 disposed [1] 1621:4 disposing [1] 1670:23 dispute [1] 1693:11 dissatisfaction [2] 1673:25 1674:12 dissatisfied [1] 1674:5 disseminate [1] 1784:2 dissident [1] 1605:19 Distance [1] 1576:14 distortion [1] 1610:11</p>	<p>distributed [1] 1779:3 District [5] 1562:1,1 1728:4,13 1730:21 document [16] 1577:13 1580:10 1587:7 1603:8 1643:4 1652:20 1691:4 1726:24 1747:16,21 1757:3,6,22 1765:14 1766:5 1767:18 documentation [3] 1691:18,22 1702:7 documents [6] 1637:11 1681:1 1726:20 1747:19 1754:2 1758:3 doesn't [21] 1565:6,15 1577:25 1578:1 1586:11 1635:9 1645:12 1667:14 1673:2 1676:18,19 1682:14 1684:22 1700:5 1700:8 1703:23 1719:2 1730:13 1755:12 1766:5 1782:21 dollars [10] 1625:25 1629:18 1630:7,16 1646:13 1650:14 1652:25 1684:2,7 1785:6 domestic [1] 1573:14 dominant [1] 1580:23 Domingo [1] 1707:23 Donald [3] 1564:20 1565:4 1569:5 done [10] 1586:16 1602:1 1603:16 1606:23 1607:13 1618:15 1632:14 1655:11 1700:17 1753:2 doubt [1] 1594:2 down [18] 1580:22 1582:3 1595:19 1609:15 1620:12 1623:11 1624:15,16 1626:1,21 1628:5 1631:19 1643:16 1647:18 1654:16 1687:13 1762:23 1781:7 downplayed [1] 1605:20 Dr [17] 1577:10 1585:3 1587:4 1642:7 1647:21 1653:15 1700:13,19,23 1700:25 1701:4,10,11 1702:7,12 1704:15 1757:12 draft [1] 1587:13 drafts [2] 1585:4 1587:5 dragging [1] 1690:10 draw [3] 1583:10 1785:24 1785:25 drawn [1] 1761:13 dream [1] 1767:25 Drive [3] 1562:11 1563:4 1563:18 Drop [2] 1759:3,7 dropped [2] 1687:15 1772:4 dropping [1] 1609:17 Duccassi [4] 1642:7 1647:21 1648:1 1653:15</p>	<p>due [5] 1663:24 1673:14 1729:2,3 1731:1 Duffey [2] 1737:7 1786:10 duly [1] 1793:8 during [4] 1575:1 1588:23 1692:22 1788:13 duties [6] 1666:4 1668:13 1668:16 1695:1 1774:15 1774:21</p>	<p>embargo [7] 1596:9,10 1596:12,12,13,14,17 embarrassment [1] 1723:23 employee [4] 1696:12 1698:16 1769:18 1794:13 employees [2] 1760:6 1760:22 empty [2] 1715:25 1716:1 en [2] 1712:8,14 encompass [1] 1594:5 encouraging [1] 1581:12 early [2] 1640:24 1782:16 early [2] 1678:24 1763:3 earned [1] 1640:15 earnings [1] 1632:23 easement [2] 1653:13,17 Eastern [2] 1728:4 1730:21 easy [3] 1601:24 1603:9 1628:16 eat [1] 1678:2 economic [2] 1573:22 1596:21 editorial [2] 1690:12 1744:4 editorials [1] 1744:5 educate [1] 1785:19 educating [1] 1784:23 education [1] 1674:21 effect [7] 1575:24 1576:1 1576:3,9 1719:15 1722:13 1724:8 effective [2] 1576:5 1735:16 effectiveness [1] 1743:5 effort [7] 1667:3 1705:8 1706:24 1707:1,3 1786:13 1786:23 efforts [1] 1588:10 ego [1] 1581:9 eight [1] 1636:24 either [9] 1630:20 1635:25 1645:9 1681:23 1683:7 1710:18,24 1742:9 1766:8 El [2] 1611:22 1731:7 Elder [1] 1644:16 elect [2] 1741:10 1742:3 electing [1] 1741:6 election [3] 1594:23 1739:21 1741:20 element [1] 1693:7 elements [5] 1580:24 1581:14 1592:16 1593:18 1784:12 Eliot [2] 1625:4 1649:15 elite [1] 1580:24 Elizardo [1] 1605:19 Elsa [3] 1644:25 1645:3 1645:8</p>	<p>embargo [7] 1596:9,10 1596:12,12,13,14,17 embarrassment [1] 1723:23 employee [4] 1696:12 1698:16 1769:18 1794:13 employees [2] 1760:6 1760:22 empty [2] 1715:25 1716:1 en [2] 1712:8,14 encompass [1] 1594:5 encouraging [1] 1581:12 end [13] 1708:18,24 1709:2,5,11 1732:19 1745:10 1755:2,3,4,4 1756:9 1759:9 ended [5] 1635:3,11 1681:5 1751:10 1759:12 endorsed [1] 1737:5 enemy [3] 1577:15 1583:20,21 engage [1] 1703:25 engaged [2] 1702:19 1724:5 engineered [1] 1709:16 English [2] 1614:3 1771:25 enjoy [2] 1636:15,17 enlighten [1] 1665:21 enormous [3] 1581:3,9 1786:9 ensure [2] 1699:7 1734:14 enter [1] 1595:15 entered [1] 1634:25 Enterprise [3] 1627:13 1634:23 1636:10 Enterprises [2] 1627:6 1635:23 enters [1] 1595:16 enthusiastically [1] 1709:4 entire [2] 1681:18 1775:1 entitle [2] 1755:19,20 entitled [2] 1575:4 1733:15 entity [1] 1574:11 entries [4] 1629:7 1634:18 1682:9 1684:6 entry [7] 1628:20 1638:12 1652:14 1679:22 1682:14 1683:1,24 environment [2] 1616:4 1775:12 episodes [1] 1676:24 Epstein [3] 1655:11,15 1656:6 Equipment [2] 1672:7 1672:12 era [3] 1579:6,11 1580:25 Ernesto [2] 1690:4</p>
---	--	---	---	---	---

-E-

<p>1696:25 errors [2] 1674:14,18 Escala [2] 1633:14,17 escape [1] 1685:5 especially [5] 1597:19 1598:4 1610:10 1766:21 1772:3 ESQ [3] 1563:7,14,21 established [5] 1734:4 1734:15 1735:12 1755:13 1755:21 establishing [1] 1668:7 estate [6] 1618:3,10,14 1621:9 1631:11,15 evaded [2] 1709:24 1710:2 evaluate [1] 1768:9 evaluation [2] 1774:22 1775:1 evaluations [1] 1723:22 event [2] 1590:2 1667:23 events [8] 1570:16 1571:14 1572:15 1577:24 1674:1 1693:16 1711:1 1784:13 eventually [1] 1704:19 Everglades [1] 1631:24 everybody [4] 1579:9 1631:25 1738:3 1752:3 everybody's [1] 1760:13 evidence [6] 1617:12 1673:11 1723:14 1765:9 1770:9,12 exact [2] 1603:8 1727:12 exactly [5] 1587:8 1618:13 1621:8 1663:7 1676:14 exaggeration [2] 1616:21 1617:3 examines [2] 1573:3,11 example [5] 1643:3,18 1658:18 1766:25 1769:13 excel [1] 1757:1 except [1] 1792:4 exception [4] 1595:21 1657:4 1716:21 1760:16 excerpt [1] 1580:23 excluded [1] 1774:6 excuse [4] 1572:19 1638:4 1707:25 1745:16 excused [1] 1791:18 excuses [1] 1778:25 executed [2] 1625:7 1638:23 executive [2] 1682:1 1741:9 executives [1] 1711:21 exercise [8] 1601:3 1604:16 1636:22 1696:21 1698:10,10 1771:22 1786:15</p>	<p>exercised [2] 1702:22 1771:17 exercising [2] 1698:3 1699:23 exert [1] 1711:17 exerted [1] 1702:13 exhibit [23] 1564:3,5 1610:22 1611:2,5 1617:21 1617:22 1654:20,21 1679:7,9,17 1681:17 1690:22,24 1691:1 1715:20 1716:2 1746:7 1746:16 1747:9,11,12 exhibits [3] 1718:12 1745:21 1746:10 exile [4] 1589:19 1664:8 1664:17 1690:11 exiled [2] 1594:24 1607:1 exiles [2] 1588:4,8 exist [3] 1719:21 1720:6 1775:11 existed [1] 1667:7 existing [1] 1719:20 expected [2] 1786:15,18 expecting [1] 1684:6 expedite [1] 1683:2 expense [2] 1742:1 1786:19 expensive [1] 1787:8 expert [3] 1599:11 1767:3 1775:7 expertise [1] 1787:16 experts [4] 1784:17 1785:14,25 1786:2 expires [2] 1792:22 1793:19 explain [6] 1567:25 1662:4 1676:13 1702:6 1729:14 1765:8 explained [1] 1566:8 explanation [5] 1693:5 1700:3 1702:4,5 1756:13 explosion [1] 1573:17 express [1] 1724:7 expressed [5] 1571:24 1577:4 1583:22 1584:25 1617:5 expresses [2] 1581:16 1719:13 expression [2] 1584:18 1584:21 extend [2] 1784:15 1785:12 extent [1] 1788:15 extra [1] 1609:9 extraordinary [1] 1701:12 extreme [1] 1581:21 exuding [1] 1581:10 eyeball [1] 1747:17 eyes [1] 1772:4</p>	<p style="text-align: center;">-F-</p> <p>facilitating [1] 1573:21 facing [1] 1635:15 fact [6] 1569:17 1599:4 1662:6,10 1699:9 1756:3 facts [2] 1666:1 1673:10 factual [3] 1674:14,18 1674:23 Factually [1] 1674:22 Failed [1] 1774:19 fair [3] 1612:24 1701:9 1726:22 falls [1] 1612:14 false [3] 1685:13 1757:17 1768:17 familiar [27] 1564:20 1565:3 1581:19 1610:13 1610:15 1655:18 1664:13 1687:22 1693:2 1734:8 1734:18 1743:24 1744:1 1744:11,12,13 1747:15 1761:9,11 1767:15 1771:2 1771:9 1775:6 1778:2 1788:5 1789:6,9 family [2] 1650:23 1652:19 far [8] 1574:13 1586:8,9 1598:2 1619:13 1656:7 1674:24 1704:11 farms [2] 1612:20 1626:22 favor [2] 1612:9 1635:24 favorable [9] 1585:15 1585:16,18,21,25 1586:2 1586:3 1601:6,11 fear [1] 1579:3 fears [1] 1581:1 feasibility [1] 1661:17 February [4] 1643:21 1644:2 1711:23 1745:22 federal [4] 1696:5 1709:18 1716:6,8 feelings [2] 1615:23 1655:25 Felix [2] 1683:2,24 felt [7] 1616:15 1617:1 1676:10 1694:10 1696:3 1703:10 1788:22 fence [1] 1600:5 Ferch [1] 1698:8 few [14] 1586:14 1598:2 1605:10 1606:2 1621:10 1660:11,12 1676:16,22 1678:6 1699:12 1702:15 1760:15 1773:10 Fidel [12] 1573:4,12 1581:7,18 1583:1,4,7 1595:21 1596:3 1612:13 1687:12 1720:7 fight [1] 1662:15 fighters [1] 1687:13 figures [1] 1607:8</p>	<p>file [4] 1618:12 1626:23 1740:6 1741:14 filed [14] 1562:21 1621:21 1624:11 1625:8 1627:10 1633:12 1634:12 1639:7,18 1640:2,7 1648:19 1651:18 1716:8 filing [3] 1624:18 1716:6 1716:16 final [6] 1591:2 1640:16 1654:16 1738:5 1752:13 1780:20 finance [3] 1670:3 1685:1,12 financial [1] 1672:1 financially [1] 1794:15 finding [1] 1783:11 fine [4] 1586:15 1642:23 1678:16 1729:1 finish [10] 1726:8 1730:2 1730:8 1731:4,18,23 1750:15 1752:24 1755:4 1755:5 finished [5] 1652:9 1669:14 1731:14 1752:25 1756:8 fired [3] 1690:20 1697:5 1699:13 firings [1] 1697:3 first [39] 1566:1,2 1573:7 1573:8 1577:9 1580:13 1581:22 1583:21 1590:7 1592:15 1593:9 1611:18 1613:11,12,23 1614:5 1618:5,6,16 1643:20,21 1646:25 1656:18 1681:23 1687:1 1698:24 1700:15 1705:10 1714:12 1733:18 1734:21 1737:2 1742:11 1747:14 1749:18,22 1750:2 1768:13 1779:4 fits [1] 1587:8 five [10] 1618:16 1624:18 1649:8 1668:22 1669:1,2 1683:11 1775:11,16 1779:5 flights [1] 1687:18 floodgates [1] 1690:9 Florida [14] 1562:1,11 1562:20 1563:6,13,20 1632:15 1648:8 1653:11 1653:14 1720:6 1793:3 1793:17 1794:2 flow [1] 1695:15 flown [1] 1699:22 fly [5] 1712:1,4,4,20 1713:20 focusing [1] 1669:17 following [4] 1573:23 1574:2 1656:23 1736:25 food [1] 1597:2 foot [1] 1650:14 footnote [1] 1591:7 footnotes [8] 1590:9,11 1590:12,13,15,17 1591:14</p>	<p>1592:1 force [5] 1705:13 1735:25 1735:25 1736:5,14 forced [1] 1711:25 forces [1] 1573:13 foregoing [3] 1792:2 1794:7,16 foreign [1] 1573:14 forever [1] 1607:16 forward [2] 1570:5,8 form [4] 1584:5 1686:19 1689:7 1761:16 former [3] 1687:4 1690:3 1696:11 formula [1] 1612:13 formulating [1] 1785:4 forth [1] 1778:12 forward [2] 1770:6 1773:23 found [1] 1594:3 foundation [20] 1576:15 1594:1 1597:3 1664:8 1665:12 1666:9,11 1667:5 1667:6 1668:5,9 1718:17 1719:16 1739:20,22 1740:23 1742:3 1758:16 1790:10,20 foundation's [1] 1605:17 founded [4] 1664:9 1790:10,19,21 four [7] 1614:14 1618:16 1620:9 1642:8 1649:8 1652:14 1759:23 FPT [1] 1631:7 frame [1] 1605:11 frankly [1] 1636:1 fraught [1] 1598:14 free [11] 1594:22 1600:14 1616:8 1636:17 1662:8 1668:7 1673:20 1695:15 1714:2 1715:6,9 freezes [1] 1728:16 frequently [1] 1720:24 Friday [1] 1672:6 friendly [1] 1695:6 friends [1] 1614:22 front [5] 1574:11 1584:11 1591:3,12 1716:11 fulfillment [1] 1784:5 full [7] 1606:10 1610:11 1714:13 1721:18 1764:2 1764:6 1766:12 fully [1] 1599:13 function [1] 1666:3 functions [1] 1686:15 fund [1] 1632:5 fundamental [2] 1735:5 1735:19 funded [2] 1705:14 1706:14 funding [4] 1619:11</p>
---	--	---	--	---

1625:15 1632:7 1650:17 funds [3] 1662:17 1756:6 1762:7 future [1] 1754:8	1616:13 1626:4 1632:6,8 1641:16,21 1642:8 1643:1 1645:21,22,23 1650:9 1664:17,24,25 1665:1 groups [6] 1598:11 1600:8,9,17 1608:3 1784:18 Grove [1] 1626:18 guard [1] 1696:1 guess [7] 1576:13 1622:4 1654:3 1688:14 1733:25 1769:19,23 Gull [1] 1635:4 guy [8] 1589:7 1631:21 1631:21 1732:3,15,16,17 1732:23 guys [2] 1576:2 1634:16	Helms-Burton [4] 1597:9,11,22 1675:4 help [5] 1588:11 1635:6 1683:21 1730:6 1785:4 helped [2] 1589:22 1590:5 helps [2] 1726:13 1756:5 Herald [7] 1581:15 1674:5,25 1675:20 1676:25 1677:17 1696:19 Herald's [2] 1673:25 1676:9 hereby [2] 1792:1 1794:5 Herminio [1] 1669:22 Hernandez [1] 1707:22 heroic [1] 1761:13 high [1] 1789:22 himself [7] 1578:8 1583:20 1664:11 1696:25 1719:13 1738:6 1788:23 hire [1] 1698:3 hiring [1] 1697:10 history [1] 1700:20 hold [3] 1621:9 1711:19 1712:18 holding [1] 1730:11 holds [2] 1662:9 1700:23 home [5] 1670:21 1684:13 1684:16,19,19 Homestead [7] 1622:1 1624:15 1626:11 1627:8 1627:18 1629:10 1654:10 honest [4] 1721:16,17 1790:2,5 honestly [1] 1692:6 honored [2] 1773:25 1774:2 hope [1] 1637:13 Hopefully [1] 1564:11 hopes [1] 1581:1 hostile [1] 1775:11 Hotel [2] 1678:24 1685:15 hour [3] 1591:2 1638:5 1732:6 hours [2] 1760:15 1791:10 house [13] 1588:17 1589:13,23 1590:6 1612:16 1626:18 1633:24 1634:1 1648:4,5,6 1682:1 1738:6 houses [1] 1612:17 Huff [9] 1624:3,4,5,6 1627:17 1628:6,13,21 1654:11 Hughes [1] 1736:15 humanitarian [1] 1596:25 Humberto [1] 1700:13 humiliating [1] 1700:21 hundred [1] 1646:13	hundreds [1] 1741:6 hunt [4] 1718:18 1719:6 1750:7 1757:5 hunting [1] 1719:7	1788:23 inclusive [1] 1794:8 income [2] 1650:20,21 incomplete [3] 1721:8 1721:15,15 inconclusive [7] 1752:4 1752:9,14,16,23 1753:5,7 incorrect [3] 1614:4 1688:22,23 increase [1] 1705:7 increased [1] 1702:9 increasingly [1] 1788:15 independent [2] 1615:22 1720:17 index [1] 1718:12 indicate [3] 1592:1 1618:1 1677:4 indirectly [6] 1699:11 1699:16 1702:23 1716:24 1720:2,8 individual [3] 1594:7 1595:23 1776:1 individually [1] 1626:3 individuals [3] 1600:15 1608:6 1737:21 industrial [2] 1650:5,6 inefficiencies [1] 1742:1 Inez [3] 1679:25 1680:2 1681:14 influence [17] 1576:20 1583:12,15 1584:22 1616:6 1664:5 1696:21 1697:9 1698:3,10,11 1699:10,15,23 1702:23 1771:18,23 influential [3] 1583:17 1584:8,16 informal [3] 1588:17 1589:2,4 information [17] 1662:10 1666:19 1668:7 1677:9 1687:6 1695:12 1695:16 1753:23 1754:6 1754:8 1767:16 1779:2 1784:3,8 1785:23,24 1789:23 informed [1] 1760:11 inherent [1] 1723:6 initial [1] 1573:2 initiated [1] 1750:11 inside [5] 1665:23 1722:5 1722:8,9 1779:4 insisted [1] 1713:1 Inspector [14] 1748:2,6 1748:12,17,19 1749:13 1749:15 1751:10,17 1752:3 1753:22 1755:7 1755:11 1756:10 instance [3] 1704:7 1709:16 1711:22 instances [1] 1776:14 instead [3] 1615:16
-G-		-I-		
G [1] 1563:7 gain [1] 1664:5 gang [1] 1636:20 GAO [4] 1733:19 1734:13 1734:23 1748:16 Garden [2] 1631:2,7 gather [1] 1784:2 Gelb [9] 1711:2,7,25 1712:4,21,25 1713:14,21 1715:2 Gelb's [1] 1712:18 general [13] 1657:9 1748:2,18,19 1749:13 1751:10,18 1752:4 1753:22 1755:8,11 1756:10 1766:2 General's [3] 1748:7,12 1749:16 gentleman [4] 1574:17 1577:8,18 1634:15 Gentlemen [1] 1733:8 genuinely [1] 1734:9 gigantic [1] 1741:21 given [4] 1598:25 1658:5 1708:6 1775:1 giving [5] 1612:9 1658:17 1720:11 1765:15 1786:12 glad [6] 1680:15 1717:17 1721:22 1722:1 1728:21 1773:25 go-between [2] 1589:8 1589:10 goes [2] 1663:22 1775:23 gone [4] 1601:3 1746:21 1747:1 1762:10 good [6] 1595:11 1596:10 1596:11 1635:21 1672:15 1749:10 government [19] 1572:3 1572:11,18 1596:15 1686:7 1703:13,23,24 1704:1 1709:18 1724:1 1735:17,25 1762:7 1781:7 1784:18,23 1785:15,20 government's [2] 1612:21 1687:10 governmental [1] 1786:1 granting [1] 1754:18 graphic [1] 1616:18 gratitude [2] 1584:18,22 great [5] 1619:6 1636:16 1668:10 1709:12 1711:17 Greater [1] 1741:7 grievously [1] 1676:8 group [17] 1608:8	-H-			
H [10] 1633:14,18,19,21 1633:25 1634:3,18 1637:25 1638:24 1782:15 Haiti [1] 1596:12 half [3] 1599:6 1750:1 1781:21 hand [2] 1621:5 1793:10 handful [2] 1662:15,16 handing [1] 1568:9 handle [5] 1658:9 1689:2 1723:24 1782:6,8 handled [1] 1775:8 harass [1] 1581:14 harassment [1] 1775:13 hard [2] 1689:24,25 hardworking [1] 1672:19 harm [2] 1752:1 1756:11 hatred [1] 1581:10 Havana [5] 1609:18 1687:15,18 1723:11 1781:5 head [1] 1666:9 headed [1] 1572:9 heading [3] 1592:7 1659:17 1735:3 headlines [1] 1752:15 health [1] 1674:20 hear [23] 1700:22 1717:11 1717:15 1718:22,25 1719:4,8,25 1720:11,14 1721:4,18 1722:16 1724:10,18,21 1725:5 1726:19 1727:11 1728:10 1728:15,18 1730:12 heard [9] 1585:17 1643:6 1726:24 1733:22 1744:7 1744:10,13 1747:3 1778:24 hearing [1] 1636:17 hearings [2] 1709:24 1723:1 hell [1] 1728:16 hello [1] 1682:3				

1657:4 1731:12 instigated [1] 1693:17 instincts [1] 1581:12 institute [2] 1565:13 1568:15 1569:6 1570:14 1570:18,23,25 1571:6,13 1571:19 1572:5,8,14 1574:6,15 1577:22 1578:9 1578:21 1609:25 1610:8 1610:16 1734:14 instituting [1] 1595:4 institution [1] 1577:2 instruct [2] 1575:7 1734:14 instructed [1] 1779:2 instructing [2] 1575:8 1599:17 instructions [1] 1590:21 instrument [9] 1624:11 1624:19 1626:23 1627:10 1636:23 1648:2 1651:18 1651:23 1702:12 instrumental [1] 1668:1 Insurance [1] 1640:8 integrity [1] 1690:12 intended [2] 1660:5 1752:11 intention [1] 1694:17 intentionally [1] 1581:13 interact [1] 1785:21 interaction [2] 1784:16 1785:13 Interamerican [5] 1646:1,3,16 1649:24 1651:9 interest [8] 1666:24 1667:11 1700:9 1723:10 1724:2,2 1768:18 1784:19 interested [4] 1592:25 1734:10 1748:8 1794:15 interesting [2] 1651:17 1690:21 interests [1] 1662:21 interfere [4] 1704:18,25 1705:4 1735:12 interfered [2] 1696:20 1705:1 interference [1] 1705:6 interfering [2] 1608:19 1608:23 interim [11] 1748:1,4,7 1751:14,20 1752:6,8 1753:9 1755:23 1768:9 1778:12 interlude [1] 1689:16 intermediaries [1] 1711:12 international [10] 1608:16 1703:12,19,24 1704:2,8 1735:10 1736:1 1786:14,17 interpret [1] 1598:16	intervened [1] 1698:6 interview [7] 1614:22 1617:8,9,11 1726:17 1727:1 1788:25 interviewed [1] 1582:8 interviews [1] 1717:13 intimidation [1] 1775:13 intolerant [1] 1581:8 intransigence [1] 1581:11 introduced [1] 1682:2 investigated [1] 1720:7 investigating [4] 1722:5 1722:8 1748:2 1785:3 investigation [25] 1722:22,24 1724:15 1748:12,17 1750:11,18 1750:21,24 1751:2,4,9,25 1751:25 1752:5,10,12,15 1752:16,17,18 1754:7 1764:23 1767:1 1777:17 investigations [2] 1722:14,22 investing [2] 1632:25 1641:15 investment [16] 1619:13 1625:20 1629:20,21,22 1629:24 1630:6,15 1631:15,18 1632:9 1635:12 1646:16 1649:24 1651:10 1652:15 investments [3] 1618:10 1618:15 1619:16 investor [1] 1640:20 investors [3] 1641:22,23 1646:1 invite [3] 1602:10 1772:22 1773:10 invited [8] 1712:13 1772:23,24 1773:1,7,9 1775:20,20 involve [1] 1620:21 involved [27] 1609:20 1618:4,6,9,14,18 1619:15 1619:22 1620:15 1623:17 1624:1 1625:19 1640:22 1640:23 1650:22 1686:17 1688:9 1689:2 1693:3 1707:3 1742:22 1760:13 1762:21 1766:12 1768:19 1780:20,20 involvement [1] 1723:19 involves [2] 1627:25 1652:14 involving [7] 1629:15 1631:1 1639:7 1640:7 1646:15 1669:22 1784:7 IR [1] 1683:3 Irma [3] 1637:6 1647:13 1648:20 irregularities [1] 1763:13 irrelevant [1] 1709:12	island [2] 1612:10 1665:23 islanders [1] 1581:19 isolated [1] 1632:9 Israel [1] 1645:25 issue [8] 1666:2 1709:9 1721:24,24 1745:12 1748:21,21 1760:4 issued [3] 1657:24 1733:19,24 issues [20] 1655:14 1657:10,13,15,18,21,22 1657:22 1658:3,24,25 1659:12 1665:22 1701:20 1733:17 1754:2 1763:19 1783:21 1784:6 1785:3 item [1] 1718:15 itself [4] 1576:14 1577:21 1586:10 1668:9 iv [2] 1564:22,23 ix [5] 1574:18,18,20 1576:11,11	Jr [2] 1639:19 1644:19 Jr. [1] 1644:18 judge [2] 1716:11 1776:9 judging [1] 1732:7 judgment [3] 1634:25 1635:23 1643:8 Juffer [1] 1777:10 Julia [2] 1648:11,14 July [6] 1729:3 1732:14 1739:15 1740:13 1774:19 1793:19 June [3] 1562:12 1793:11 1794:21 Junior [1] 1645:9 Junior's [1] 1645:7 justification [2] 1595:13 1693:6	1639:24 1650:7 1654:11 language [5] 1612:23 1614:3,6 1616:3 1736:25 large [3] 1562:20 1642:5 1758:17 larger [1] 1660:1 last [14] 1570:5 1592:8 1641:1 1725:1,17 1727:9 1747:1,3 1749:24 1763:18 1772:4 1773:1 1784:21 1785:10 lately [2] 1772:24,25 latter's [1] 1601:12 law [12] 1703:24,25 1704:2,4,8,11,13 1709:25 1724:23 1755:13,21 1784:5 law-abiding [1] 1594:9 laws [2] 1703:12,19 lawsuit [4] 1673:13 1731:12,13 1758:22 lawyers [1] 1597:10 lawyuit [1] 1640:20 leader [3] 1581:2 1601:20 1664:11 leaders [14] 1589:19 1601:13,19 1602:4,19,21 1603:21,23 1604:5,10,16 1604:18 1607:1,2 leadership [6] 1588:18 1589:12 1608:1,6 1740:14 1784:11 leaflets [2] 1609:17 1687:16 Leafy [4] 1626:15 1648:4 1648:5,6 leak [2] 1750:22 1751:15 leaked [6] 1750:17 1751:6,18 1752:1 1753:7 1766:23 leaking [2] 1752:9,14 learn [1] 1768:14 learned [2] 1616:23 1704:12 learning [1] 1766:18 least [11] 1578:11 1601:18,20,20 1602:3,14 1602:18 1639:3 1668:11 1739:3,7 leave [2] 1708:2 1728:5 leaving [1] 1696:16 led [2] 1648:18 1668:12 left [5] 1616:1 1643:13 1663:14 1696:14 1738:9 leftist [2] 1581:20 1750:9 legally [1] 1703:4 legislation [6] 1597:10 1660:5 1675:6 1743:4 1748:20,24 legislative [1] 1743:2 legitimate [3] 1756:14 1756:17 1758:25 lend [1] 1757:5
-K-				
K [1] 1683:2				
keep [13] 1662:12 1665:8 1678:13 1682:3 1695:6 1696:1 1698:11,12 1715:21 1720:11 1749:20 1765:15,15				
keeping [2] 1662:22 1788:19				
kept [5] 1603:19 1616:2 1658:13 1662:19 1663:9				
Key [1] 1635:4				
kill [2] 1669:21,24				
kind [10] 1587:1 1597:24 1604:1 1626:25 1632:13 1670:7 1674:18 1686:17 1702:19 1736:4				
kinds [1] 1759:23				
knew [1] 1633:7				
knowing [2] 1734:10 1769:6				
knowledge [9] 1606:9 1612:8 1688:24 1757:18 1774:12 1775:17 1781:20 1784:15 1785:13				
known [2] 1565:7 1748:3				
knows [2] 1746:12 1749:3				
Kristin [1] 1777:10				
Krome [1] 1639:25				
-L-				
L [2] 1620:15 1782:16				
label [1] 1771:1				
lack [4] 1660:3,14 1663:23,24				
lacked [3] 1693:8,8 1734:3				
lady [4] 1623:2 1698:13 1750:17 1766:19				
land [14] 1623:19,20 1624:15 1625:12 1627:17 1629:12 1631:13,17 1632:1 1633:20 1637:17				

length [1] 1702:6
lengthy [1] 1599:5
less [14] 1594:6 1599:8
 1599:14 1600:1,22 1601:1
 1604:21 1606:14 1608:2
 1637:11 1662:15 1759:6
 1759:6 1761:23
letter [19] 1696:18,24
 1697:7 1699:13,18,20,21
 1699:25 1700:4,5,7,8,10
 1702:15,18,21 1747:23
 1747:24 1753:21
liaison [5] 1588:17
 1589:1,3,4 1590:1
libel [1] 1775:13
liberal [1] 1750:9
Liberty [4] 1640:7
 1641:6 1653:24,24
Library [1] 1679:18
life [5] 1577:12 1579:10
 1632:15 1640:8 1641:6
Light [2] 1653:11,14
likes [1] 1637:4
limit [2] 1742:25 1743:16
limited [5] 1743:14,15
 1743:18 1758:24 1784:24
limiting [2] 1745:5,13
Linda [1] 1746:1
line [7] 1580:8 1697:24
 1717:17,17 1759:11
 1772:4 1780:21
lines [1] 1592:9
Lippe [4] 1782:15,20,22
 1787:4
listed [2] 1636:10
 1640:25
listen [8] 1605:22,23,24
 1695:15 1727:5,20 1730:1
 1764:6
listened [1] 1764:16
listening [1] 1636:15
listing [1] 1626:7
litany [1] 1695:1
literal [1] 1566:14
litigate [2] 1758:6,25
litigation [5] 1598:5
 1758:10,12 1759:6,11
live [3] 1616:3 1748:21
 1759:16
lives [2] 1579:5 1612:16
living [1] 1636:19
loan [3] 1652:1,7 1653:2
loans [1] 1653:9
lobbied [1] 1662:10
local [4] 1575:14,16,18
 1575:20
located [1] 1648:12
log [1] 1749:21
logger [2] 1768:21,25
longer [1] 1663:4
look [17] 1589:6 1590:13
 1592:7 1619:4 1620:25

1637:4 1643:22 1679:12
 1680:22 1683:24 1684:9
 1725:1 1733:2 1736:22
 1765:1,9 1788:12
looked [2] 1692:7
 1781:16
looking [16] 1572:24
 1580:10,22 1587:21
 1590:7 1591:24 1611:18
 1612:1 1620:12,13 1622:3
 1716:7 1719:2 1733:14
 1790:18 1791:2
looks [5] 1573:13
 1628:13 1630:5 1648:20
 1684:12
lose [1] 1703:14
lost [5] 1580:25 1690:7
 1690:18,19 1714:3
lots [4] 1648:24 1649:7,8
 1649:11
LOUISE [3] 1562:7
 1563:16,24
love [5] 1636:13 1758:6,6
 1758:23 1759:8
low [1] 1735:8
lower [1] 1596:5
lucidity [1] 1676:25
lucky [1] 1732:5
lunch [1] 1668:24
lying [1] 1610:17

-M-

M [1] 1652:14
maintain [2] 1576:16
 1671:18
maintains [1] 1690:4
major [7] 1573:22
 1629:19,19,21,22,24
 1741:21
majority [1] 1733:24
makes [5] 1738:18
 1759:23 1769:7,11,12
malice [1] 1729:8
man [12] 1581:3 1595:18
 1672:4,19 1701:7,10,11
 1701:13 1702:1 1723:17
 1790:2,5
manage [3] 1714:2
 1715:5,9
managed [1] 1766:7
management [16]
 1603:5 1605:12 1701:8
 1706:17 1711:4,18 1714:4
 1769:21 1772:8,9 1774:6
 1774:11 1778:20 1781:21
 1782:10 1785:8
managers [1] 1788:23
mandate [1] 1743:2
manipulated [1]
 1717:19
manipulation [1]
 1786:19
manuscript [1] 1585:21

March [1] 1736:13
Marcus [1] 1716:11
Marian [7] 1750:5
 1753:21 1754:1,13,19,25
 1757:7
Marino [2] 1645:25
 1652:19
mark [11] 1638:5 1654:19
 1655:12,16 1656:7 1679:6
 1690:24 1715:19 1746:6
 1773:21,22
marked [12] 1564:3,6
 1610:19,22 1611:5
 1617:20,22 1654:21
 1679:9 1691:1 1716:2
 1746:16
Marmol [2] 1645:25
 1652:19
Marti [19] 1577:11
 1579:2,8 1580:2,6 1584:7
 1601:5,21,25 1602:4,7,19
 1603:3,5,6,7,19 1605:13
 1605:22,24 1606:11
 1608:5,8,13,22 1609:16
 1609:20 1656:23 1657:1
 1657:7,12,25 1658:10,12
 1658:14,18,23 1659:4,15
 1659:19 1662:13,17,18
 1662:21,23 1667:5,7
 1668:2,11,12 1673:23
 1687:9,14,25 1688:8,11
 1688:12,15 1690:3,6,8,19
 1690:19 1692:23 1693:4
 1694:20 1695:14,17
 1696:4,6,21 1697:10
 1698:14,22,24 1699:7,11
 1699:15,23 1701:8,20
 1702:10,24 1703:1,3,13
 1703:14 1704:9,16,18,23
 1705:1,2,4,6,10 1706:7
 1706:16 1708:7,15,16,19
 1708:22,22 1709:6,9,11
 1709:13 1711:18 1713:17
 1714:2 1715:6,9 1723:20
 1723:22,24 1734:8,19
 1735:7 1736:2,15 1743:6
 1743:23 1744:1 1749:8
 1750:6,13,15 1751:12
 1752:2 1753:24 1754:20
 1755:2,4,23,25 1756:2,6
 1756:8,9,12 1757:3,12
 1758:15,15 1760:14,16
 1760:18 1762:11 1763:23
 1766:11,13,14,15 1767:15
 1767:17,18 1768:18,22
 1769:21,22 1771:17,18
 1771:23 1773:10,25
 1777:14 1778:18,19
 1779:18,19 1780:6,11,24
 1780:25 1781:5 1782:11
 1783:6,13 1784:5,12,17
 1785:14,19,22 1786:11
 1786:18 1787:10,16,18
 1788:17,20,23
Marti's [6] 1711:4
 1733:20 1734:15 1735:3
 1784:15 1785:12
Martin [1] 1575:22
Mas [67] 1562:4,15

1564:17 1581:2,6,19
 1598:21 1601:7,11 1618:1
 1643:11 1644:8 1645:10
 1659:22 1664:4,9,10
 1669:10 1679:8,12,23
 1683:3,4 1684:1,3,10
 1690:6 1693:18 1696:2
 1697:9,15 1698:6 1699:9
 1700:15 1701:7 1702:10
 1705:13 1709:15 1711:3
 1711:16 1712:1,17,20,23
 1714:3 1715:6,10 1718:18
 1718:19 1719:16 1725:15
 1730:15 1731:7,19 1733:2
 1733:14 1739:5 1750:13
 1759:21 1763:5 1767:25
 1788:14,19,21 1792:1,13
 1793:7
Mas' [1] 1676:9
master [2] 1768:21,25
material [4] 1592:2
 1730:17 1754:17,18
matter [6] 1568:9 1606:9
 1630:21 1658:9 1738:9
 1741:4
matters [6] 1601:6,10
 1666:19 1682:11 1706:3
 1731:13
Maurice [1] 1620:15
may [14] 1598:20 1599:23
 1613:9 1666:23 1677:21
 1718:3 1720:18,23,23
 1727:2 1731:6,6 1758:8
 1785:10
McKENZIE [1]
 1563:10
mean [25] 1566:16,25
 1567:13,15,17 1578:1
 1590:12 1615:21 1616:10
 1616:24 1632:13 1633:12
 1636:22 1661:4 1663:11
 1663:13 1682:14 1705:23
 1705:24 1741:19 1752:12
 1763:6 1765:14 1781:13
 1791:1
meaning [2] 1569:19
 1697:14
means [16] 1566:18,20
 1567:15 1569:10,18
 1592:4,20,21 1593:22,23
 1594:10 1614:7,11
 1618:13 1630:10 1794:18
meant [6] 1569:22
 1593:10 1617:5 1675:23
 1675:24 1781:10
medicine [2] 1597:2
 1674:21
Medrano [9] 1700:13,19
 1700:23,25 1701:4,10,11
 1702:7,12
meet [8] 1678:15,23
 1685:14 1712:1,5 1728:23
 1734:4,15
meeting [12] 1595:17
 1656:25 1699:1 1712:12
 1712:21 1713:1,7,12,15
 1760:17 1773:14,17

meetings [4] 1606:11,12
 1772:10,18
member [7] 1569:17
 1578:8 1670:10 1671:24
 1671:25 1741:7 1753:8
members [34] 1656:20
 1657:5,6,8 1660:4,15
 1705:12 1735:6,20 1737:3
 1737:12 1739:10,14,18
 1739:19,25 1740:1,2,3,6
 1740:18,19 1741:5,6,14
 1741:14,18 1744:18
 1750:18 1751:3,24
 1754:14 1757:1 1766:23
memo [1] 1729:2
memoranda [1] 1711:14
memory [2] 1637:13
 1661:6
memos [1] 1757:15
mental [2] 1601:3
 1604:16
mentioned [8] 1583:13
 1604:21 1619:20 1620:6
 1620:9 1622:1 1643:12
 1646:2
merchant [3] 1622:12
 1640:12 1642:23
merchants [2] 1620:22
 1719:21
meritless [2] 1769:5
 1776:8
merits [1] 1656:21
message [2] 1590:6
 1680:9
met [10] 1681:25 1685:23
 1686:3,3 1712:6,9,19
 1723:17,18 1783:2
Miami [33] 1562:11
 1563:6,13,20 1581:15
 1588:18 1589:12 1612:4
 1620:22 1631:22 1640:2
 1673:9,25 1675:19 1676:9
 1677:17 1685:22,25
 1686:2,4,16 1696:19
 1702:8 1712:1,4,6,9,21
 1724:17 1741:7 1786:11
 1786:22 1788:20
Mickey [2] 1620:5
 1626:10
microphone [1] 1745:17
middle [5] 1580:16
 1594:6,7 1631:24 1735:3
miedra [2] 1614:5,20
mierda [2] 1615:5,16
might [14] 1573:16
 1607:4 1615:20 1622:6
 1640:11 1675:13,17
 1677:22 1704:6 1755:18
 1755:19 1757:7 1770:6
 1785:4
mike [1] 1736:7
Mile [2] 1670:18 1671:5
million [3] 1612:14
 1630:24 1652:25
millions [1] 1785:6

<p>mind [5] 1581:16 1616:19 1678:5,9,10</p> <p>mine [1] 1654:17</p> <p>minimal [1] 1781:13</p> <p>minimize [1] 1574:25</p> <p>minority [1] 1733:25</p> <p>minute [8] 1572:19 1580:11 1613:8,8 1668:22 1691:10 1745:19 1747:16</p> <p>minutes [7] 1582:7,11 1606:2 1669:1,2 1689:8 1768:6</p> <p>mirror [2] 1581:7 1583:1</p> <p>misallocated [1] 1762:17</p> <p>misfortune [1] 1758:2</p> <p>misinformation [1] 1700:10</p> <p>misleading [1] 1763:14</p> <p>misled [1] 1791:4</p> <p>misquote [1] 1615:11</p> <p>misquotes [1] 1614:19</p> <p>miss [1] 1759:13</p> <p>missed [1] 1572:5</p> <p>mission [4] 1669:21,23 1669:25 1756:9</p> <p>mistaken [4] 1714:6,8 1714:11 1764:13</p> <p>misunderstood [1] 1585:19</p> <p>misuse [1] 1762:7</p> <p>mocked [1] 1687:16</p> <p>moderate [52] 1592:16 1592:18,20,21 1593:18 1593:22,25 1594:2,5,10 1594:13,14 1595:6,9 1596:11,16,19,20 1597:4 1597:7,12,23 1598:9,10 1598:12,14,16,19,21 1599:1,2,5,7,8,9,14,20 1599:22,24,24,25 1600:1 1600:5,7,10,17,22,22,23 1601:1,1</p> <p>modest [1] 1706:6</p> <p>moment [2] 1598:8 1719:15</p> <p>moments [2] 1676:15,16</p> <p>money [13] 1612:7 1629:15,16 1632:10,11 1633:1,9 1672:3 1685:6 1742:10 1762:10,14,16</p> <p>monology [1] 1595:16</p> <p>monopoly [1] 1662:9</p> <p>Montaner [1] 1604:11</p> <p>month [5] 1603:13 1606:3 1606:13 1763:25 1773:19</p> <p>months [6] 1605:10 1606:13 1607:7 1688:6 1711:2 1731:14</p> <p>mooted [1] 1748:20</p> <p>Moreira [1] 1707:23</p> <p>Moreover [1] 1581:2</p> <p>morning [4] 1676:21</p>	<p>1728:17 1772:2 1777:4</p> <p>mortgage [38] 1620:20 1621:21 1622:4,5,16,20 1623:10 1625:7 1626:8 1627:11 1628:7 1629:1 1632:2 1633:11 1637:1 1640:14 1641:10 1646:23 1647:3,10,16,17 1651:3,4 1651:6,8,12,16,20,21 1652:2,8 1653:1,3,23 1654:2,5,14</p> <p>mortgages [5] 1623:12 1626:1 1629:8 1639:2 1640:11</p> <p>most [19] 1602:11 1605:18 1612:12 1625:25 1652:6 1658:21 1663:3 1674:6,8,9,10 1676:18 1691:14 1700:20 1701:23 1703:7 1758:21 1760:14 1774:23</p> <p>mostly [1] 1606:3</p> <p>mother [4] 1672:20 1676:11,13 1677:15</p> <p>Mother's [2] 1677:10,20</p> <p>mothers [1] 1677:12</p> <p>motion [1] 1764:2</p> <p>motivated [8] 1756:18 1765:20,23 1766:1 1767:2 1767:5 1768:17 1790:1</p> <p>motivation [1] 1769:10</p> <p>Mountcastle [1] 1574:13</p> <p>move [4] 1612:11 1777:6 1786:10,22</p> <p>moving [2] 1626:21 1643:16</p> <p>Mrs [1] 1754:1</p> <p>Ms [4] 1668:22 1669:1 1698:8 1757:7</p> <p>Muscat [2] 1620:5 1626:10</p> <p>must [7] 1579:4 1612:11 1622:15 1637:4 1717:14 1735:14 1738:5</p> <p>Mutual [1] 1653:24</p>	<p>1667:6 1668:5 1679:19 1680:23,25 1681:8 1706:13 1739:20,22 1758:16</p> <p>nations' [1] 1735:13</p> <p>nature [1] 1674:11 1686:11,13 1741:20 1754:16</p> <p>Navarro [2] 1707:24 1778:22</p> <p>Nazario [1] 1761:2</p> <p>near [1] 1745:10</p> <p>necessarily [7] 1571:25 1590:3 1600:2 1674:2,4 1740:20 1764:18</p> <p>necessary [1] 1765:8</p> <p>need [11] 1568:16 1638:6 1668:7,20 1715:25 1716:18 1729:22 1733:6 1745:21 1752:21 1761:19</p> <p>needed [2] 1752:17 1753:2</p> <p>needlessly [1] 1676:10</p> <p>needs [2] 1579:13 1580:3</p> <p>neighborhood [1] 1649:22</p> <p>neither [3] 1683:11 1714:1 1715:4</p> <p>Nelson [2] 1633:14,17</p> <p>never [45] 1582:14,18 1585:17 1614:6,21 1615:21 1617:10 1642:19 1643:6 1659:12 1667:7 1671:6,8,20,21 1678:25 1681:13,14 1694:10 1696:19,20,21 1699:14 1702:16,22 1704:1 1710:9 1710:13 1711:10 1723:13 1723:17 1731:25 1734:23 1739:11 1741:4 1744:7 1747:21 1748:6 1760:17 1768:8 1771:21 1775:8 1778:13,21 1781:16</p> <p>new [10] 1562:7 1563:9 1575:14 1580:13 1719:21 1728:14 1739:21 1748:20 1748:23 1774:21</p> <p>news [16] 1603:6 1606:21 1606:22 1662:9 1688:7,8 1760:20 1763:14,20,22 1766:16 1783:23 1785:1 1787:15 1788:16 1790:9</p> <p>newspaper [3] 1590:21 1673:6,9</p> <p>next [45] 1578:25 1580:16 1581:4 1582:5 1587:21 1592:10 1601:4,9 1610:20 1617:21 1620:12,20 1622:3,18,23 1624:10 1625:6,6 1626:7,14 1627:5,25 1628:21 1632:3 1637:25 1645:13 1651:16 1652:14 1653:5,6 1654:20 1661:2 1664:11 1679:7 1682:25 1690:23 1695:7 1708:9 1715:20 1719:10 1746:7 1773:18,19,19</p>	<p>1774:5</p> <p>nice [1] 1635:16</p> <p>night [2] 1703:12 1731:17</p> <p>nine-member [1] 1737:10</p> <p>nobody [6] 1597:18 1681:13 1727:17 1732:4 1732:7 1766:15</p> <p>nobody's [1] 1701:10</p> <p>nominal [1] 1653:19</p> <p>non-Hispanic [1] 1616:12</p> <p>non-political [2] 1608:1 1608:6</p> <p>non-rotation [1] 1738:13</p> <p>non-terms [1] 1738:15</p> <p>none [4] 1644:11 1679:3 1689:1 1725:21</p> <p>nonexistent [6] 1778:19 1779:19 1780:6,10,14 1781:11</p> <p>nor [7] 1683:11,11 1714:1 1715:5 1731:2 1794:12 1794:14</p> <p>normal [3] 1705:7,8 1780:3</p> <p>North [16] 1615:20 1678:23 1679:2,20 1680:7 1680:17,19 1681:4,12,15 1681:23,24 1682:4,19 1683:10 1685:14</p> <p>Notary [3] 1562:19 1792:21 1793:17</p> <p>notation [1] 1626:15</p> <p>note [2] 1620:20 1688:15</p> <p>notebook [4] 1680:19 1681:11,18 1683:22</p> <p>notebooks [2] 1679:20 1683:20</p> <p>noted [3] 1737:7,9 1743:1</p> <p>notes [5] 1591:18 1640:14 1640:14,18 1794:9</p> <p>nothing [8] 1579:3 1644:15 1669:12 1716:21 1720:2,8 1756:4 1765:23</p> <p>notice [7] 1562:21 1590:9 1618:5 1639:1 1640:25 1661:2 1747:5</p> <p>notion [1] 1665:9</p> <p>notwithstanding [1] 1727:7</p> <p>now [60] 1569:14,17 1573:24 1576:9 1590:7 1593:7 1598:9 1599:6 1601:6,10 1612:16,20 1621:8,9 1625:6 1626:7 1634:22 1637:20 1639:3 1640:1 1653:5,10 1659:17 1662:24 1663:22 1664:15 1665:15 1668:1,13 1672:25 1673:17 1678:19 1682:18,25 1683:20 1688:4,24 1703:10 1707:15 1711:1,16 1718:9</p>	<p>1719:17 1729:22 1731:23 1733:3 1743:15,19 1748:25 1753:9 1754:19 1759:15,21 1763:16 1768:6 1772:3 1786:7 1787:10 1790:13 1791:4</p> <p>nuance [1] 1665:6</p> <p>number [18] 1574:20 1576:13 1623:24 1638:10 1639:1 1657:8 1662:6 1679:24 1680:5,8 1684:10 1684:19,19 1689:17,18 1705:3,9 1747:6</p> <p>numbered [1] 1794:8</p> <p>numbers [7] 1618:11,12 1653:25 1684:11,14,16 1684:17</p> <p>numeral [6] 1564:23 1572:24 1573:7,8 1574:18 1576:11</p> <p>numerous [3] 1743:21 1778:23,24</p>
-O-				
<p>O [1] 1640:24</p> <p>OATH [1] 1793:1</p> <p>object [10] 1579:16 1584:5 1597:19 1616:10 1617:10 1667:8 1675:5 1686:19 1689:7 1761:16</p> <p>objection [20] 1565:14 1575:12 1587:14 1598:13 1599:19 1605:3 1633:3 1665:15 1671:12 1673:10 1680:10 1685:17 1707:5 1710:14 1742:11 1748:23 1767:5 1770:10 1776:15 1777:6</p> <p>objections [1] 1674:25</p> <p>objective [4] 1608:5 1699:8 1763:23 1766:17</p> <p>objectivity [1] 1607:25</p> <p>obligation [1] 1728:23</p> <p>observers [2] 1735:5,20</p> <p>OCB [4] 1760:6 1772:8 1781:21 1786:10</p> <p>OCB's [1] 1778:19</p> <p>occasions [3] 1658:23 1674:15 1755:1</p> <p>occurred [1] 1698:19</p> <p>Ocean [1] 1635:16</p> <p>off [17] 1572:20 1574:23 1609:3 1613:23 1689:9 1689:11 1692:10 1715:24 1717:23 1733:6,10 1736:10,11 1759:2,5 1788:2 1791:16</p> <p>offensive [2] 1700:22 1763:6</p> <p>offer [1] 1764:21</p> <p>offered [1] 1715:2</p> <p>office [14] 1672:6 1681:14 1682:1 1684:17 1697:15 1702:8 1748:3 1748:13 1751:9,10</p>				

<p>1753:10,11 1754:4 1756:11 officers [3] 1739:21 1740:22 1742:4 official [10] 1572:1 1589:7 1606:10 1716:23 1728:12 1754:8 1772:9 1774:15 1789:22 1793:10 officials [1] 1781:6 often [7] 581:11 1604:21 1606:1,12 1607:1 1701:17 1720:22 old [2] 1612:16 1614:15 Olga [1] 1761:2 Oliver [9] 1678:23 1679:2,19 1680:7 1681:23 1681:24 1682:19 1683:10 1685:14 Ollie [6] 1680:17,19 1681:4,11,14 1682:4 Omni [2] 1678:24 1685:15 Ona [2] 1640:13,24 once [15] 1589:22 1605:25 1606:2,13 1616:7 1652:8 1662:17 1681:25 1699:5 1701:18 1716:25 1723:5 1751:24,24 1788:24 one [115] 1579:18 1581:20 1585:6,12 1589:24 1590:22 1593:16,16 1594:16 1595:5,17 1601:4 1603:1 1607:12 1612:12 1612:16 1615:8 1616:22 1620:12,13,20 1621:17 1622:3,7,18,23 1624:10 1625:6,10 1626:14,16,22 1627:5,7,25 1628:14 1630:24 1637:5 1638:15 1638:17,20,22,24,25 1639:4 1641:1 1642:12 1644:18 1645:13,24 1646:25 1648:16 1649:5 1649:17 1650:22 1651:2 1651:17 1653:23 1662:7 1662:7 1663:1,2,16 1676:24 1679:8 1682:7 1682:22 1684:18 1690:16 1690:23 1694:6 1700:19 1705:3,9 1706:1,17 1708:4,5 1710:18,24 1711:21 1717:12 1730:20 1731:4 1733:4 1734:8,17 1735:8 1737:19 1738:20 1745:19 1747:10,12 1751:8 1752:15 1753:7 1755:2 1756:7 1760:4,7,7 1760:24 1761:5 1766:15 1768:13 1772:8 1773:18 1773:19 1775:17,19,22 1777:20,24 1785:10 1787:5 ongoing [4] 1603:18 1607:17,18,21 open [2] 1577:11 1598:5 opened [1] 1690:9 opera [1] 1713:3</p>	<p>operation [8] 1632:4 1670:9 1692:19 1696:5 1697:10 1699:6,11 1783:12 operational [1] 1711:4 operations [9] 1693:3 1696:20 1699:15 1742:23 1771:18,23 1780:19,19 1782:9 opined [1] 1658:2 opinion [19] 1570:24 1574:6,8 1577:1,13,16,17 1577:18 1591:21 1656:5 1665:22 1675:10 1696:14 1696:17 1723:16 1724:7 1741:4 1742:6 1775:9 opinions [6] 1615:23 1616:1 1675:8,17 1676:1 1697:2 Oppenheimer's [1] 1591:1 opponent [5] 1708:19 1708:24 1751:11 1753:24 1754:20 opportunity [2] 1594:19 1598:6 opposed [5] 1675:2 1708:15 1709:3 1738:13 1739:10 opposite [1] 1581:21 opposition [3] 1675:5 1690:6 1708:6 option [2] 1662:19 1695:14 order [1] 1768:9 ordinarily [1] 1592:1 ordinary [1] 1787:19 organizing [7] 1576:17 1664:8 1665:11 1665:14 1670:8 1740:9 1740:10 organize [2] 1588:10 1741:20 original [15] 1609:5 1612:22 1613:24 1681:2 1681:4 1716:13,15 1720:15 1721:20 1722:16 1726:16,20 1727:5,12,20 originally [1] 1662:24 originating [1] 1660:5 otherwise [3] 1578:5 1710:12 1716:19 ourself [2] 1600:24 1616:7 ourselves [1] 1742:18 ousted [4] 1690:5,16 1702:16 1709:6 ouster [1] 1690:9 outside [5] 1779:4 1784:17 1785:14,22 1786:19 outstanding [2] 1640:14 1692:24 OVELMEN [211] 1563:14 1564:2,6,8,11,16</p>	<p>1565:16,20,25 1566:13 1566:17,22 1568:5,10,14 1568:18,23 1569:3 1570:2 1570:3,9,12 1574:24 1575:5,7,16 1576:4,10 1579:19,23 1582:24 1586:13,16,18,19 1587:20 1593:4,11,14 1598:22,24 1599:16 1600:3,19 1605:7 1605:14,15 1609:7,9,11 1609:13 1610:19 1611:1 1611:4,9,14,17,23,25 1613:20 1614:10,14,24 1617:20,25 1621:22 1622:2,11,13 1628:12,16 1628:19 1630:23 1633:6 1633:10 1638:7,11 1639:16,17 1641:4,7,12 1643:17 1644:1,10 1645:6 1654:19,24 1656:11,13 1667:14,19,22 1669:6,7,9 1669:16,20 1671:16 1673:15 1678:5,8,10,12 1678:14,22 1679:6,11,16 1679:21 1680:12 1681:19 1681:21 1682:17 1685:20 1686:1,5 1689:8,13,25 1690:2,23 1691:3,19,23 1692:6,15 1707:9,15,18 1708:3 1710:18,21,23 1714:14,19 1715:19 1716:5,15 1717:5,20 1718:1,7,14 1720:19 1721:7,11 1722:3 1725:11 1725:18,19 1726:5,11 1727:21 1728:22 1729:1 1729:4,10,13 1730:3,9,15 1731:25 1732:5,12,25 1733:1,8,13 1736:8,10,12 1739:9 1741:24 1742:16 1745:19 1746:6 1747:10 1747:13,25 1748:5 1749:2 1749:5 1758:19 1759:13 1759:14,20 1761:22 1762:25 1763:4 1767:6,9 1770:15 1772:5,13,16 1776:17 1777:1,8,9 1779:9,11,12 1782:19,22 1782:24 1788:9 1791:5,7 1791:11,14 overblown [1] 1617:3 overboard [1] 1616:25 overdue [1] 1597:18 overlapping [1] 1784:25 overnight [1] 1728:17 oversight [2] 1786:16 1786:17 overtones [1] 1598:15 overwith [2] 1732:10 1772:2 own [34] 1581:17 1597:16 1604:17 1612:5,16 1615:18,23 1616:3,4 1619:6,8,9,14 1623:7 1625:17,17,17 1626:6 1627:15 1632:9 1633:4,8 1636:1,2 1640:13 1644:20 1646:5 1675:14 1740:10 1751:17 1754:22 1755:6</p>	<p>1787:17 1788:21 owned [5] 1619:8,12 1646:3,6 1653:16 owner [1] 1643:9 owners [2] 1612:6,17 owning [1] 1627:13 <hr/> <p style="text-align: center;">-P-</p> <hr/> P [2] 1782:16,16 P.A [2] 1563:3,17 p.m [4] 1562:12,15 1564:1 1791:19 page [54] 1564:22 1570:5 1571:22 1574:18,19 1576:11 1580:10,11,12 1580:17 1592:7,8 1601:9 1611:18 1612:1 1613:15 1613:16 1625:7 1626:11 1641:2,3,4,5,8 1643:16 1643:16,17,20,21,24 1644:4,5,5 1661:2 1679:23 1683:1 1689:17 1689:18,20 1691:12 1708:8,9 1714:13 1725:14 1725:15 1727:9 1733:17 1735:3 1736:22 1772:12 1772:13 1779:8 1782:18 1788:8 pages [5] 1591:25 1775:25 1776:1 1779:9 1794:7 paid [5] 1607:19 1672:8 1696:5 1761:8 1762:9 painting [1] 1672:13 paintings [4] 1716:9,22 1720:3 1722:1 Pais [1] 1611:22 Panama [1] 1685:6 panel [5] 1736:25 1737:2 1742:19 1743:21 1744:22 paper [3] 1618:11 1673:5 1675:7 papers [2] 1668:6 1677:3 paragraph [42] 1565:11 1565:17,18,22 1570:6 1573:3,8,9 1577:3 1578:14,25 1580:13 1581:23 1582:2 1583:25 1587:8,22,23 1590:7,8 1592:8,10 1601:4,9 1607:24 1656:18,19 1664:3 1689:22 1690:14 1708:9,10,12 1714:13,21 1714:24,24 1719:10 1725:17 1727:9 1733:21 1743:11 paralegal [1] 1745:25 parcel [1] 1786:23 parents [1] 1684:12 parentheses [1] 1679:25 part [30] 1587:12 1588:4 1595:25 1602:25 1623:8 1626:4,9 1627:19 1628:4 1628:7 1632:6,8 1655:22 1657:14 1663:24 1668:10</p>	<p>1673:20,22,24 1674:3 1694:4,25 1706:24 1709:12 1714:24 1725:16 1725:21 1727:9 1784:21 1786:23 partial [9] 1623:11,19 1627:10,22 1628:7 1629:1 1629:8 1633:11 1654:14 participate [3] 1594:22 1693:12 1748:11 participated [1] 1726:25 participating [1] 1670:12 participation [1] 1612:10 particular [2] 1583:10 1621:16 parties [1] 1794:12 parts [1] 1752:21 past [7] 1573:25 1609:15 1618:15 1663:24 1730:18 1730:19 1781:20 patriot [1] 1701:11 Paul [5] 1563:21 1631:21 1639:19 1745:21 1746:18 Pause [11] 1565:1 1580:18 1592:13 1610:24 1613:17 1654:23 1691:16 1692:9,12 1725:22 1753:12 paving [8] 1633:14,18,19 1633:21,25 1634:3,18 1637:25 pay [1] 1670:3 payment [5] 1631:19 1632:2,3 1640:17 1647:19 payments [2] 1634:20 1672:17 peaceful [2] 1573:21 1594:17 Pedro [1] 1631:1 pending [4] 1575:10,12 1761:21 1786:24 penetrate [1] 1616:19 Pennsylvania [2] 1728:4 1730:21 Penthouse [1] 1563:19 people [71] 1593:25 1594:6,8,18,22 1595:3,8 1597:15 1598:6,11,25 1599:1 1604:22 1615:22 1615:25 1616:17 1619:15 1619:22 1620:6,10 1625:19 1627:16 1632:25 1643:7 1656:3 1662:20 1663:3 1665:23 1666:21 1666:23 1667:2 1668:8 1676:17,19,22 1677:2 1695:15 1699:25 1702:3 1703:7 1705:21 1706:13 1706:14,14,15,17,18,21 1707:4,19 1772:5 1724:22 1737:10 1738:19,20 1740:13,14 1757:10,18 1758:24 1760:9,21 1764:20,24 1768:12</p>
---	--	--	---	---

<p>1770:7 1772:23 1773:10 1781:2,3,4 Pepe [1] 1707:22 per [1] 1683:3 percent [1] 1626:1 percentage [1] 1652:20 perception [8] 1589:14 1665:11 1675:13,14,15 1696:10 1701:25 1755:22 Perez' [1] 1575:22 perform [2] 1589:18,21 performance [2] 1774:22 1775:1 performed [4] 1605:1,2 1605:6,9 perhaps [3] 1652:4 1728:5 1786:1 period [7] 1570:1 1619:7 1630:3 1632:16 1773:8 1774:23 1780:14 perjurer [2] 1770:17,22 perjury [1] 1782:3 persecution [2] 1750:7 1768:16 person [14] 1577:10 1583:18 1584:3,16 1585:24 1586:3,4 1598:17 1600:1 1612:15 1750:9 1758:21 1770:13 1788:25 personal [2] 1650:18 1769:20 personally [5] 1707:2 1719:16 1732:8 1783:2 1793:7 personnel [12] 1672:7 1672:12 1697:15 1742:24 1763:8,9 1767:17 1771:17 1782:9 1788:3,3 1790:16 persons [5] 1738:23 1739:2 1754:9 1757:11 1761:10 perspectives [1] 1784:4 persuade [1] 1706:20 pet [1] 1588:6 phone [3] 1681:13 1684:16 1701:19 phrase [2] 1589:2,4 physically [1] 1731:2 picking [1] 1772:3 piece [23] 1577:6,9 1583:21 1584:24 1585:11 1623:1 1624:14 1625:12 1627:15,20 1629:12 1631:13,23 1633:20 1634:19 1639:24 1646:5 1646:6,8 1650:2,4,7 1654:11 pieces [9] 1619:9 1623:20 1627:18 1631:17,20 1637:17 1640:14 1654:12 1675:6 Pinochet [2] 1596:14 1686:23 place [5] 1594:24 1643:9</p>	<p>1711:22 1712:13 1750:20 placed [1] 1607:25 Plaintiff [2] 1562:5 1563:2 Planas [29] 1577:10,19 1583:12,15,17 1584:1,3 1584:11,19,22 1585:3,17 1586:6,15,21 1587:4,6,9 1590:19,23 1591:10,15 1591:19,19,22,22,23 1760:24 1761:2 Planas' [1] 1585:20 plane [2] 1609:17 1687:15 planes [2] 1609:15 1687:13 Plantation [1] 1635:4 platform [2] 1696:4,7 play [6] 1705:18,20 1706:7 1716:25 1728:2 1729:19 played [6] 1581:11 1657:17,20 1705:19 1706:5,6 players [1] 1706:10 pleased [3] 1570:14 1577:22 1578:5 pleasure [1] 1738:4 pocket [2] 1619:14 1625:17 point [7] 1576:8 1582:10 1635:22 1688:14 1778:20 1778:23 1782:13 pointed [1] 1737:11 pointless [1] 1736:16 police [1] 1719:11 policy [12] 1568:13 1572:1 1573:19 1578:18 1592:18 1593:20 1594:11 1596:10,11 1601:13 1666:7,10 political [38] 1573:4,12 1573:13,16 1577:15 1583:19 1598:14 1636:13 1636:15 1664:16,24,25 1665:1,11,13,20 1687:11 1702:11 1714:2 1715:6 1715:10 1719:11 1748:9 1750:4,7,8 1753:23 1757:3,4,4,25 1765:14 1766:4,18 1767:18 1768:15 1769:9 1786:9 politically [8] 1717:19 1756:18 1765:20,23,25 1767:2,4 1789:25 politicals [1] 1788:20 politicization [12] 1656:24 1657:11,23 1658:11,12 1659:2,6,8,17 1659:19 1689:23 1690:10 politicized [1] 1580:7 politics [1] 1690:11 poor [1] 1672:4 portion [3] 1681:18,19 1681:20</p>	<p>Posada [3] 1685:2,4,5 position [35] 1572:1,10 1589:8 1595:7,9 1596:1 1596:16,19 1597:3,8,23 1604:19 1608:9 1663:10 1663:14 1664:10,20 1667:10 1690:5,17 1695:18 1715:3,3 1737:24 1737:25 1738:2,3 1740:14 1755:19 1765:19,19 1767:21 1768:7 1774:15 1774:20 positions [3] 1584:20 1594:12 1760:12 possible [4] 1600:25 1702:18 1764:13 1784:13 post-Castro [2] 1579:6 1579:11 potboiler [1] 1687:11 potentially [2] 1573:19 1786:19 pounds [1] 1599:8 power [3] 1653:11,14 1743:14 powerful [2] 1584:3,15 practice [1] 1724:5 practices [3] 1763:8,9 1790:16 praising [1] 1686:23 pre-Castro [1] 1580:25 precise [1] 1592:22 pregnant [1] 1599:22 prematurely [1] 1752:1 premise [2] 1592:23 1665:4 premises [2] 1722:5,10 prepared [3] 1603:2,10 1776:7 prepares [1] 1606:17 prerogative [2] 1770:4 1772:22 presence [1] 1697:16 present [2] 1563:23 1712:25 presented [2] 1763:22 1770:9 presenting [2] 1763:21 1770:13 president [22] 1581:5 1582:5,15,17 1588:16 1589:17 1635:7 1666:17 1694:8 1695:11 1706:12 1737:19 1738:4,6,9,10,11 1738:16,18 1743:6 1755:16 1788:25 President's [4] 1735:25 1772:10,18 1775:21 presidential [7] 1693:19 1694:1,12 1696:3 1709:22 1738:7 1786:20 press [11] 1718:16 1754:12 1756:21,24,25 1757:1,2,19 1758:1 1760:1 1766:23</p>	<p>pressure [9] 1608:2,7 1702:10,13 1711:17,20 1714:2 1715:6,10 pressured [1] 1711:3 pressures [1] 1786:9 prestige [1] 1701:12 prestigious [1] 1700:20 pretty [3] 1616:2 1658:13 1691:9 preventing [1] 1756:5 previous [5] 1571:22 1683:17 1711:2 1742:15 1753:20 previously [1] 1793:8 price [9] 1623:4,21 1625:22 1640:12,16 1641:18,19 1648:15 1650:11 priest [2] 1639:21,22 primary [2] 1581:2 1652:1 printed [1] 1779:3 private [1] 1784:18 privy [1] 1779:17 probable [1] 1652:6 problem [14] 1595:12,22 1595:24 1605:18 1698:13 1719:11,11 1728:4 1730:20 1741:16 1760:13 1769:20 1775:5 1780:18 problems [3] 1730:16 1756:14 1759:6 procedures [1] 1734:14 process [3] 1706:19 1710:6 1752:1 procuring [1] 1724:15 produce [4] 1573:16 1692:3 1756:4 1780:13 produced [1] 1716:17 product [1] 1787:9 production [1] 1746:19 professional [7] 1562:19 1693:9 1731:3 1749:10 1786:16 1790:3 1794:5 professor [9] 1565:12 1567:18,20 1568:12 1569:6 1578:18 1583:10 1584:23 1586:24 program [11] 1582:7,11 1595:5 1705:13 1724:8 1755:5,12,21 1760:20 1785:2 1787:15 programming [3] 1606:6 1784:10 1790:9 programs [4] 1606:22 1606:23 1783:23 1785:4 progressively [1] 1774:14 prohibited [2] 1754:10 1772:8 prohibits [1] 1575:17 project [2] 1667:5</p>	<p>1683:10 projects [2] 1588:6 1601:13 proletarians [1] 1612:11 prolonged [1] 1729:23 promise [3] 1697:20 1698:11,12 promote [2] 1596:22 1664:11 promoting [1] 1588:5 promotion [1] 1742:23 pronounces [1] 1782:20 proof [1] 1723:14 propagate [2] 1664:7 1666:1 propensity [1] 1581:9 proper [2] 1742:5 1771:1 properly [2] 1600:12 1764:25 properties [7] 1579:5 1597:13,17 1618:25 1621:4,10 1623:13 property [25] 1579:10 1618:2,23 1619:3,6 1621:25 1622:16,16 1623:1,6,15 1627:24 1631:23 1632:3 1634:15 1634:15,19 1635:25 1646:24 1650:2 1651:4,5 1651:8,22 1716:10 proposal [2] 1743:13,16 proposals [1] 1573:18 propose [1] 1702:25 proposed [1] 1786:22 proprietors [2] 1612:12 1612:15 prospective [1] 1598:17 prospects [2] 1573:4,11 protect [2] 1597:12 1754:5 provide [9] 1671:23 1672:1 1683:9 1754:2 1773:11 1774:20,22 1784:7 1785:23 provided [5] 1590:18 1643:8 1679:18 1681:8 1778:17 provides [2] 1743:4 1787:8 providing [3] 1597:10 1670:7 1754:6 provoked [2] 1608:18 1608:23 prudent [1] 1594:8 public [19] 1562:19 1577:12 1584:2 1596:16 1597:6 1618:2,3 1630:21 1665:22 1699:14 1702:19 1750:12 1766:24 1773:14 1773:15 1784:5,18 1792:21 1793:17 publication [3] 1570:18 1570:22 1676:9 publications [1] 1667:4</p>
---	--	---	--	--

<p>publicly [5] 1577:14 1584:20 1587:9 1596:7 1751:2</p> <p>publish [5] 1570:14 1571:7,17 1577:22 1668:6</p> <p>published [7] 1571:13 1572:13 1609:25 1610:8 1675:9 1696:19 1697:1</p> <p>publishes [1] 1578:4</p> <p>publishing [1] 1677:17</p> <p>purchase [8] 1623:4,21 1625:22 1641:18 1648:15 1649:14 1650:11,23</p> <p>purchased [1] 1648:13</p> <p>purport [1] 1764:10</p> <p>purported [1] 1763:21</p> <p>purports [2] 1655:10 1718:2</p> <p>purpose [5] 1665:19,21 1665:24,25 1680:7</p> <p>pursuant [2] 1562:20 1716:10</p> <p>purview [1] 1775:23</p> <p>put [10] 1584:11 1603:17 1632:11 1651:11,21 1705:17 1719:20 1756:23 1770:25 1787:9</p> <p>putting [1] 1642:18</p>	<p style="text-align: center;">-R-</p> <p>racist [1] 1596:14</p> <p>radio [175] 1577:11 1579:2,8 1580:1,6 1584:7 1601:5,21,25 1602:4,7,19 1603:3,5,6,7,19 1605:12 1605:22,24 1606:9,11 1608:4,8,24 1609:16,20 1655:12 1656:22 1657:6 1658:10,12,14,23 1659:19 1661:17 1662:8,12,16,18 1662:21,22 1664:6 1666:15 1667:5,7 1668:2 1668:10,12 1673:23 1676:7 1687:9,14,25 1688:8,11,12,15 1690:3,7 1690:18,19 1692:23 1693:4 1694:19 1695:14 1695:16 1696:4,6,20 1697:10 1698:14,21,24 1699:15,23 1701:7,20 1702:10,24 1704:18 1705:1,4,9 1706:7 1708:22 1713:17 1714:2 1715:5,9 1717:13 1718:3 1720:22,23,24,25 1723:20 1723:22,24 1724:8 1726:17 1727:1 1733:15 1734:8,19 1743:5,23 1744:1 1749:8 1750:6,13 1750:15 1751:12 1752:2 1753:24 1754:20 1755:2 1755:4,23,24 1756:2,6,8 1756:8,12 1757:3,12 1758:14 1760:14,16,18 1762:11 1763:23 1766:11 1766:12,14,15 1767:15 1767:16,18 1768:17,22 1769:21,22 1771:17,18 1771:23 1773:10,24 1777:14 1778:18 1779:18 1780:4 1782:10 1783:5 1783:13 1784:5,12,15,17 1785:12,14,19,22 1786:11 1786:18 1787:10,14,14 1787:16,18,19 1788:16 1788:20,23</p> <p>Rahal [2] 1620:15 1643:6</p> <p>raid [6] 1669:11 1670:1,4 1670:7,12 1671:1</p> <p>raids [2] 1670:21 1671:19</p> <p>raise [1] 1736:6</p> <p>raised [1] 1790:8</p> <p>range [1] 1619:5</p> <p>rank [2] 1740:5 1741:14</p> <p>RAOUL [1] 1563:7</p> <p>rather [5] 1696:4 1697:6 1706:6 1740:18 1761:13</p> <p>ratification [1] 1735:9</p> <p>ratings [1] 1692:24</p> <p>Raul [4] 1595:21 1596:3 1730:1,3</p> <p>Re [1] 1716:9</p> <p>reached [1] 1757:8</p> <p>reaching [1] 1589:22</p> <p>reaction [1] 1719:12</p>	<p>read [56] 1564:25 1565:7 1566:2,11,14 1567:9 1568:24,25 1571:22,23 1580:11,19 1592:10 1602:23,24,25 1606:3 1613:13 1614:8 1664:22 1664:23 1673:5 1688:19 1688:21 1691:6,10 1699:3 1714:10 1743:10 1747:18 1747:20 1751:22 1753:16 1753:19 1754:22 1756:21 1757:11,13,14,16,19,22 1758:3 1759:22 1760:12 1761:14,17,18,19 1762:4 1766:19 1768:14 1783:24 1785:10 1790:25 1792:2</p> <p>readers [2] 1610:12 1616:20</p> <p>reading [5] 1583:24 1614:21 1655:6 1677:3 1790:18</p> <p>reads [5] 1570:13 1573:3 1576:14 1656:19 1785:12</p> <p>ready [6] 1564:14 1654:25 1669:7 1719:22 1731:9,17</p> <p>Reagan [6] 1588:5,9,23 1661:16 1694:8 1789:1</p> <p>real [7] 1618:2,10,14 1621:9 1631:10,14 1790:25</p> <p>realize [1] 1756:23</p> <p>really [17] 1589:5 1596:5 1601:2 1602:22 1616:19 1640:15 1672:17 1692:1 1698:17 1709:10 1723:16 1731:19 1757:1 1760:2 1775:8,17 1781:13</p> <p>realty [3] 1618:2 1619:12 1623:17</p> <p>reappointed [1] 1663:7</p> <p>reappointment [1] 1710:6</p> <p>reappoints [1] 1663:19</p> <p>reason [9] 1576:19 1583:9 1615:3 1662:20 1673:22 1693:11 1708:20 1776:4 1782:2</p> <p>reasonable [3] 1594:7 1630:6,14</p> <p>reasons [6] 1708:6,18 1730:19 1731:3 1732:20 1735:8</p> <p>reassigned [1] 1702:7</p> <p>reassure [2] 1579:2 1662:18</p> <p>reassured [2] 1579:5,10</p> <p>rebuilding [1] 1594:25</p> <p>recalls [1] 1720:17</p> <p>RECE [8] 1670:9,10 1671:19,20,22,24,25 1672:2</p> <p>receive [2] 1688:5 1778:23</p> <p>received [2] 1672:5 1692:23</p>	<p>receiving [2] 1607:8 1788:16</p> <p>recent [2] 1746:19 1774:23</p> <p>receptions [1] 1686:15</p> <p>Recess [4] 1638:8 1669:3 1689:12 1716:4</p> <p>reclaim [1] 1612:17</p> <p>recognize [11] 1577:20 1578:7 1642:19 1655:3 1658:15 1673:2,6 1676:16 1676:19 1684:14,18</p> <p>recognizes [1] 1676:22</p> <p>recollection [14] 1565:4 1617:13 1621:8 1626:19 1635:7 1639:3,4 1682:9 1684:3,23 1719:3 1723:25 1727:13 1760:4</p> <p>recommend [2] 1756:1 1784:6</p> <p>recommendation [20] 1576:17,21 1579:12,14 1579:17,18 1580:3,4 1607:23 1608:12,12 1736:5 1737:6,15 1742:19 1742:25 1743:9 1744:17 1744:22 1785:8</p> <p>recommendations [9] 1573:23 1574:3 1576:12 1737:1 1743:6,22,24 1744:8,11</p> <p>recommended [2] 1734:13 1737:3</p> <p>reconfirms [1] 1635:10</p> <p>record [33] 1572:21 1574:23,24,25 1597:5 1609:4 1611:12,21 1621:20 1630:22 1638:10 1643:23,24 1655:9 1664:23 1679:16 1681:7 1689:10,11 1692:11 1716:5 1717:23 1731:16 1733:7,10,12 1736:10,11 1747:22 1777:23 1782:13 1788:2 1791:17</p> <p>recorded [2] 1636:24 1637:19</p> <p>records [12] 1603:18 1618:3,3 1620:25 1621:2 1621:5,6,11 1624:6 1628:18 1713:19,22</p> <p>recruiting [2] 1698:5,19</p> <p>recruitment [1] 1742:23</p> <p>reduce [1] 1785:8</p> <p>reemphasize [1] 1720:1</p> <p>refer [5] 1591:14,19,19 1599:13 1691:8</p> <p>reference [8] 1572:4 1591:6 1626:21 1628:6 1631:6 1634:22 1643:10 1649:24</p> <p>referenced [2] 1630:25 1653:12</p> <p>references [1] 1639:19</p> <p>referencing [1] 1640:1</p>	<p>referred [3] 1623:15 1635:5 1697:17</p> <p>referring [5] 1585:10 1639:22 1661:9 1683:14 1726:21</p> <p>refers [4] 1598:10 1624:14 1631:2 1692:5</p> <p>reflect [8] 1570:24 1572:1 1618:17 1621:2 1635:9 1675:8,9,12</p> <p>reflected [1] 1620:13</p> <p>reflection [2] 1584:1 1726:10</p> <p>reflects [3] 1577:1,17 1626:2</p> <p>reform [1] 1573:22</p> <p>refresh [8] 1565:4,6 1635:6,10 1682:8 1684:3 1684:22 1719:2</p> <p>refuse [3] 1599:3 1600:21 1720:13</p> <p>refused [1] 1595:14</p> <p>regard [3] 1610:5 1674:8 1723:19</p> <p>regarded [1] 1667:25</p> <p>regarding [17] 1596:11 1657:15 1668:6 1674:9,9 1674:17 1711:8 1716:20 1721:3,6,10,14,22 1737:1 1742:20 1750:6 1778:6</p> <p>regime [2] 1573:15 1576:21</p> <p>region [6] 1570:16 1571:15,16 1572:15,15 1577:24</p> <p>Registered [2] 1562:18 1794:4</p> <p>regularly [2] 1658:21 1687:19</p> <p>regulations [2] 1740:9 1740:10</p> <p>rehash [1] 1682:15</p> <p>reinforcement [1] 1608:9</p> <p>relate [4] 1618:3 1633:13 1676:17 1766:5</p> <p>related [6] 1638:14 1653:9 1656:9 1673:24 1734:2 1784:7</p> <p>relates [3] 1627:23 1635:2 1762:16</p> <p>relating [11] 1587:13 1633:13 1634:12 1639:3 1658:9 1666:19 1683:10 1716:24 1720:8 1731:13 1769:5</p> <p>relations [1] 1702:19</p> <p>relationship [7] 1682:4 1685:21 1686:12,14 1720:5 1749:7,10</p> <p>relationships [1] 1679:1</p> <p>relative [1] 1794:13</p> <p>release [8] 1623:20 1627:11,22 1628:7 1629:1</p>
---	--	---	---	--

1633:11 1685:1,4 releases [3] 1623:12 1629:8 1654:14 relevant [1] 1784:3 reliable [2] 1617:17 1768:12 reluctance [1] 1779:6 rely [5] 1609:24 1610:7 1757:17,23 1764:20 remember [39] 1603:11 1617:9 1625:23 1627:3 1629:4 1631:21 1634:8 1637:14 1638:3 1640:18 1647:15 1650:13 1653:18 1653:20,22,24 1655:4,6 1669:10,21,24 1670:1 1673:1 1686:8,9,10 1687:4 1710:21 1712:14 1717:8,9 1718:8,24 1726:13 1736:4 1750:3 1773:3 1776:18 1780:7 remittances [3] 1596:24 1596:25 1597:1 remove [1] 1711:3 removed [1] 1781:23 repeat [3] 1607:15,15 1743:12 repeatedly [2] 1750:12 1774:6 repeating [1] 1742:18 repertoire [1] 1614:23 repetitive [2] 1695:7 1776:21 replace [1] 1774:21 reply [3] 1729:5,6 1731:1 report [85] 1570:15 1571:13,19,24 1573:24 1577:1,4,21,23 1578:12 1579:19 1598:10 1600:4 1600:7 1602:23,24,25 1603:2,10,14,15,16 1606:10,19,20,21 1607:17 1607:18,21,21 1609:24 1609:24 1610:7,10 1655:2 1655:6,11 1659:18 1660:6 1663:22 1689:14 1690:13 1733:15,19,25 1734:1,13 1734:23 1735:4 1736:24 1736:25 1742:20 1743:21 1748:1,1,4,7,9,10 1749:13 1749:16 1751:14,21 1752:6,8,13 1753:6,7,10 1755:23 1756:1,7,20 1757:21 1759:22 1760:1 1761:14 1762:15 1765:5 1765:12 1766:9,20 1768:9 1778:12 1794:6 reported [1] 1779:3 reporter [7] 1562:19 1707:25 1715:16,18 1728:13 1794:5,20 reporting [1] 1764:11 reports [22] 1606:4,15,22 1606:23,25 1607:1,3,6 1610:14 1655:7 1687:24 1688:4 1734:9,18 1763:14	1763:20 1764:17,21,21 1773:11 1778:22 1781:2 represent [3] 1601:13 1681:7,11 representation [2] 1578:22 1681:17 representing [1] 1662:20 reprisal [6] 1760:6,10,23 1761:10 1766:14 1771:16 reprisals [2] 1767:17 1772:7 reproduced [1] 1680:23 reproduction [1] 1794:17 reproductions [2] 1679:17,18 Republic [3] 1562:7 1563:9 1653:1 reputation [7] 1610:13 1771:3,9 1778:2 1787:3 1788:6 1789:24 request [2] 1607:4 1754:5 requested [3] 1720:5 1745:6 1751:3 require [3] 1661:15,19 1787:22 required [2] 1693:8 1752:24 requires [2] 1669:16 1735:11 requiring [1] 1661:20 Rescue [1] 1687:14 research [49] 1565:12 1568:12 1569:5,11 1578:17 1584:6 1601:23 1602:1,2,6 1603:6,9,18 1604:17,20 1606:20,21 1655:11,19,21 1700:16 1757:18 1777:15 1778:17 1778:21,22 1779:5,13,16 1779:22,25 1781:24 1783:5,11,17,18,21 1784:24,24 1785:5,7,9 1786:11 1787:7,11,12,13 1787:17,22 researchers [1] 1590:22 resell [2] 1629:13 1632:2 residence [1] 1634:5 residential [2] 1634:6 1650:4 resign [3] 1694:14,16,17 resignation [2] 1697:20 1698:2 resigned [1] 1714:4 resist [1] 1699:1 resources [1] 1625:18 respect [12] 1593:15 1594:11 1595:10 1596:1 1596:3,9 1597:9 1656:6 1745:5,12 1749:12 1763:18 respects [1] 1581:6 respond [9] 1721:13,23	1722:2,15,17 1726:22 1728:21 1729:16 1745:1 response [5] 1600:23 1699:21 1729:5 1737:6 1778:16 responsibilities [2] 1666:4 1723:6 responsibility [4] 1606:19 1706:16 1765:1 1774:16 responsible [6] 1662:22 1668:10 1673:22 1722:13 1722:21,24 rest [4] 1615:13 1643:2 1738:5 1747:23 restart [1] 1593:12 result [2] 1726:17 1780:21 results [2] 1779:6 1781:22 retaliating [3] 1608:19 1608:23 1687:17 retaliation [1] 1778:16 return [4] 1670:15,18 1671:6,13 returned [2] 1671:4,5 reverend [1] 1631:22 review [7] 1743:5 1745:6 1745:11 1762:16 1766:12 1768:8 1790:15 reviewed [8] 1573:24 1757:9,10 1760:8 1763:19 1766:8 1776:13 1788:10 reviewing [1] 1764:2 Ricardo [3] 1591:22 1676:9 1685:9 Richard [15] 1562:18 1563:14 1577:10,19 1585:3 1587:4 1591:23 1639:8,13 1643:4,5 1761:2 1793:16 1794:4 1794:24 Rick [18] 1599:19 1678:2 1678:19 1681:16 1715:13 1721:6 1725:23 1732:9 1732:22 1733:4 1753:17 1759:17 1762:23 1772:1 1773:22 1776:19 1782:6 1791:9 Rick's [1] 1727:8 RIF's [1] 1786:23 Rifas [1] 1643:6 right [108] 1564:13 1565:9 1567:7,18 1570:2,20 1571:20 1572:12,23 1578:3,24 1579:19 1580:20 1582:21 1584:11 1585:9 1586:13 1587:3 1587:21,25 1591:5 1594:22 1597:20 1598:22 1603:20 1605:14 1612:17 1613:22 1614:2,7 1618:23 1619:24 1622:14 1623:13 1628:12,21 1631:23 1635:24 1639:3 1643:1 1643:13 1644:2,11 1646:4	1650:24 1652:10 1654:1 1654:15,25 1655:9 1663:5 1663:17 1665:24 1668:19 1669:6 1671:24 1673:16 1676:5 1678:8,12 1679:4 1682:15 1692:6 1695:21 1699:4 1701:2 1706:22 1706:23 1714:14 1717:6 1717:13,14 1719:5 1721:11 1725:18 1729:1 1729:4,10 1733:14 1735:1 1742:17 1744:15 1750:10 1752:7 1753:15,18 1755:12 1759:18,21 1760:3 1762:3 1764:5 1768:20 1769:24 1770:1 1770:4 1771:2,7,25 1775:22,24 1776:6,17 1783:7,15 1784:1,20 1787:24 rights [2] 1636:22 1770:1 ring [1] 1631:8 risks [1] 1723:6 road [2] 1594:7,7 Roberto [1] 1604:11 Roberts [2] 1637:6,9 Rodriguez [4] 1604:12 1631:1 1683:2,25 Rolando [1] 1749:7 role [18] 1577:11,12 1657:17,20 1659:20 1705:18,19,20,22 1706:5 1706:6,6,8 1783:16,18 1785:19 1786:20 1789:21 roles [1] 1589:18 Roman [6] 1564:22 1572:24 1573:7,8 1574:18 1576:11 roots [1] 1580:25 rope [1] 1732:19 rotate [1] 1744:17 rotated [2] 1737:4 1744:24 rotation [2] 1738:8,12 Round [1] 1591:22 route [2] 1712:8,14 RPR [2] 1793:16 1794:24 rude [2] 1732:17,23 rule [6] 1575:15,16,18,20 1576:8 1740:11 rules [4] 1576:7 1731:24 1740:8,10 rumors [1] 1723:12 run [3] 1612:19 1710:12 1710:16 running [1] 1582:14	sarcasm [1] 1762:24 satellites [1] 1781:7 satisfaction [4] 1626:8 1626:14 1629:8 1637:1 saw [6] 1584:13 1702:2,3 1712:15 1734:21 1777:4 says [39] 1565:19 1567:23 1567:24 1568:13,17,20 1569:2,24,24 1577:3,21 1577:21 1578:12,17,25 1580:23 1660:6 1661:2 1679:23 1683:1,2 1687:9 1690:13 1699:5 1700:2 1700:12 1701:4 1702:13 1703:10 1708:5 1709:15 1711:1,16 1712:17 1780:5 1781:19 1785:23 1788:13 1790:19 scale [1] 1660:1 scandal [1] 1756:4 schedule [1] 1728:6 scheduled [1] 1735:14 Schulz [5] 1564:20 1565:4,5 1569:5 1593:10 Schulz' [1] 1593:3 SCHWIEP [42] 1563:21 1575:14,24 1628:15 1635:21 1643:20 1644:4 1644:7,25 1645:4 1668:24 1678:16,20 1689:11 1713:18 1715:24 1716:17 1718:9 1728:11 1729:3,9 1729:17,20 1731:6 1732:24 1739:8 1745:23 1746:1,4,10,12,20,23 1747:3,7,12 1758:12 1759:3,7 1763:3 1782:20 1791:12 scope [5] 1742:25 1743:14 1745:5,13 1790:14 Scott [3] 1723:15,17 1724:12 Sea [1] 1635:4 seal [1] 1793:10 Search [1] 1716:10 second [12] 1576:13 1580:13 1595:18 1641:7 1689:22 1708:10,12 1717:21 1733:4,9,21 1742:19 secondhand [1] 1677:8 seconds [1] 1715:23 secret [3] 1581:4 1582:4 1658:16 secretary [1] 1680:2 section [5] 1631:7 1723:10 1724:2,3 1725:2 secure [2] 1579:6,11 security [3] 1568:12 1578:18 1706:13 see [52] 1570:5 1576:2,12 1576:17 1577:12 1582:25 1591:20 1612:22 1620:13 1626:22 1634:22 1636:9
---	--	--	---	--

-S-

<p>1636:21 1637:16,20 1638:1 1646:25 1647:13 1652:11 1655:4,10 1666:21 1667:2,17,19,20 1671:10 1677:10,18,21 1679:22 1681:1 1682:8 1687:20 1709:7 1720:14 1725:2 1726:20 1730:10 1738:12 1741:3,5 1746:22 1751:5 1769:8 1770:23 1775:10 1782:12 1783:25 1787:10,18 1790:22</p> <p>scem [5] 1609:23 1610:4 1631:10 1761:13 1786:23</p> <p>segments [1] 1781:5</p> <p>seizure [4] 1716:9,22 1720:3 1721:25</p> <p>selected [1] 1694:7</p> <p>self-funding [1] 1632:22</p> <p>sell [5] 1618:23 1638:21 1649:7 1719:22,22</p> <p>seller [1] 1624:7</p> <p>selling [2] 1627:14 1649:11</p> <p>semantics [1] 1599:10</p> <p>Senate [8] 1661:3,11,13 1661:15 1663:9 1695:20 1695:24 1712:19</p> <p>Senators [1] 1706:11</p> <p>send [3] 1685:6 1727:25 1746:13</p> <p>senior [1] 1778:20</p> <p>sense [4] 1599:21 1630:9 1675:16 1731:6</p> <p>sensitivity [1] 1701:12</p> <p>sentence [23] 1566:1,2 1567:4,6,8,9,23 1568:7 1568:20 1569:5,10,18,19 1569:20,24,24 1570:1,13 1588:3 1593:17 1599:23 1615:7 1659:23</p> <p>sentences [1] 1580:22</p> <p>series [2] 1623:11 1629:6</p> <p>serious [2] 1768:11,12</p> <p>seriously [1] 1690:11</p> <p>servant [1] 1712:24</p> <p>serve [1] 1738:4</p> <p>served [3] 1663:3,4 1737:10</p> <p>serves [1] 1589:8</p> <p>service [5] 1655:11,19 1655:21 1687:10 1736:2</p> <p>Services [1] 1672:8</p> <p>serving [2] 1667:12 1738:19</p> <p>session [3] 1562:15 1563:25 1773:15</p> <p>set [2] 1666:6 1773:20</p> <p>sets [1] 1666:9</p> <p>Seven [2] 1670:18 1671:5</p> <p>several [11] 1607:13 1618:6,9,14 1640:13 1658:23 1672:9,14,25</p>	<p>1673:4 1687:12</p> <p>shame [1] 1723:23</p> <p>shameless [1] 1719:20</p> <p>share [4] 1578:1 1594:19 1595:3 1632:23</p> <p>shared [1] 1705:12</p> <p>shareholders [1] 1740:21</p> <p>sheet [2] 1618:11 1641:1</p> <p>Sherman [8] 1761:4,5 1769:14 1770:6,20 1772:6 1772:17 1773:16</p> <p>Sherman's [3] 1770:16 1771:3 1775:25</p> <p>shit [3] 1612:2 1614:5,11</p> <p>shoemakers' [1] 1612:19</p> <p>shops [2] 1612:19,19</p> <p>Shores [3] 1634:23 1635:23 1636:2</p> <p>shorthand [1] 1794:9</p> <p>shortly [1] 1699:6</p> <p>shot [2] 1609:15 1687:13</p> <p>show [4] 1568:8 1681:2 1717:16 1728:7</p> <p>showed [3] 1624:3 1720:12 1780:13</p> <p>showing [2] 1778:17 1779:18</p> <p>shows [3] 1568:11 1584:22 1604:20</p> <p>sick [1] 1730:22</p> <p>side [1] 1690:16</p> <p>signal [5] 1703:11 1704:17,20 1705:6,8</p> <p>signature [2] 1570:6 1792:13</p> <p>significance [2] 1761:24 1784:13</p> <p>significant [4] 1705:22 1705:23,25 1737:8</p> <p>Simon [1] 1631:4</p> <p>simple [2] 1568:5 1612:12</p> <p>simply [1] 1600:8</p> <p>simultaneously [1] 1709:20</p> <p>sisters [1] 1595:2</p> <p>sitting [2] 1668:24 1776:12</p> <p>situation [1] 1573:20</p> <p>six [1] 1731:2</p> <p>size [6] 1633:22 1652:22 1657:1 1658:14 1659:3 1659:14</p> <p>Skaggs [7] 1751:11,14 1751:20,22 1753:25 1754:1,14</p> <p>sketch [2] 1565:11 1578:15</p> <p>slander [1] 1775:13</p> <p>sleeping [1] 1703:8</p>	<p>slightest [2] 1640:4 1775:3</p> <p>small [14] 1612:19 1619:9 1623:5,6 1625:13 1626:18 1627:18 1631:17,17 1647:18 1658:16 1687:14 1780:11,12</p> <p>Snyder [4] 1687:1,2,8 1688:17</p> <p>Soap [1] 1713:3</p> <p>social [1] 1686:15</p> <p>society [1] 1616:7</p> <p>sold [22] 1619:1 1623:20 1624:24,24 1627:18 1633:20 1634:6,15,17 1637:18,24 1638:2,15,17 1639:24 1646:7,11 1649:6 1649:6,7,8 1654:12</p> <p>solution [2] 1595:22,25</p> <p>someone [7] 1577:14 1590:5 1663:16 1694:10 1761:24 1768:16 1769:9</p> <p>someplace [1] 1680:21</p> <p>sometime [6] 1603:11 1607:9 1652:2 1661:8 1728:25 1780:2</p> <p>sometimes [7] 1575:10 1625:4 1676:20,20 1701:23 1777:2 1780:3</p> <p>somewhere [1] 1680:21</p> <p>son [2] 1588:16 1589:17</p> <p>soon [1] 1594:23</p> <p>sophisticated [1] 1589:6</p> <p>sorry [16] 1570:7 1576:12 1616:15 1617:1 1642:16 1642:17 1664:25 1668:16 1684:3 1736:8 1739:23 1753:17 1762:25 1763:5 1782:4 1791:1</p> <p>sort [1] 1614:25</p> <p>soul [1] 1719:22</p> <p>sound [4] 1596:10,11 1724:19 1784:20</p> <p>source [7] 1592:2 1595:24 1625:15 1668:7 1717:15 1751:8 1781:9</p> <p>sources [5] 1591:10 1784:17 1785:14,25 1786:1</p> <p>South [6] 1562:11 1563:4 1563:18 1596:15 1631:22 1720:6</p> <p>Southern [2] 1562:1 1728:13</p> <p>Southwest [1] 1625:13</p> <p>Soviet [1] 1702:9</p> <p>Soy [1] 1731:8</p> <p>space [1] 1708:2</p> <p>Spanish [8] 1612:22 1613:24 1616:17 1716:13 1716:16,19 1717:1 1726:9</p> <p>Sparco [4] 1645:14,14 1646:8,10</p>	<p>speak [1] 1673:21</p> <p>speaking [1] 1595:17</p> <p>speaks [2] 1600:4,7</p> <p>specific [11] 1573:18 1576:12 1711:21 1721:12 1721:21 1722:17,20 1743:11 1766:4 1768:8 1772:7</p> <p>specifically [9] 1579:4 1584:24 1588:10 1602:25 1659:24 1721:1 1740:22 1778:15 1788:17</p> <p>speculate [1] 1633:7</p> <p>speculation [3] 1633:5 1680:11 1766:3</p> <p>speech [2] 1636:17 1676:6</p> <p>speeches [1] 1581:10</p> <p>spend [3] 1670:17 1760:14,15</p> <p>spent [1] 1710:3</p> <p>spite [1] 1699:9</p> <p>spread [2] 1619:9 1640:15</p> <p>SSI [5] 1564:17 1576:20 1577:5 1591:22 1610:14</p> <p>stability [1] 1573:13</p> <p>staff [5] 1700:16 1754:4 1754:15 1757:13,23</p> <p>stand [2] 1601:6,10</p> <p>standard [1] 1567:2</p> <p>standards [10] 1656:25 1657:11,24 1658:13 1659:3,11 1733:20 1734:5 1734:16 1743:23</p> <p>start [2] 1591:13 1673:8</p> <p>starts [1] 1592:9</p> <p>state [7] 1562:20 1706:12 1748:25 1766:22 1793:3 1793:17 1794:2</p> <p>statement [35] 1580:8 1586:12 1598:18 1601:22 1605:16 1654:16 1657:3 1690:8,15 1692:18 1693:23 1699:12 1701:9 1711:5 1718:16 1720:10 1722:25 1725:10 1748:9 1751:23,24 1753:6,20 1754:22 1757:4,11,11,13 1757:14,16,25 1773:24 1782:3 1783:25 1790:20</p> <p>statements [7] 1586:25 1587:1 1588:15 1590:18 1754:3 1766:9 1789:6</p> <p>states [42] 1562:1 1579:4 1601:19 1655:23 1656:21 1659:18 1662:11 1666:2 1666:18,18 1690:3 1693:15 1695:11,25 1697:8 1700:10 1702:22 1703:23 1704:1,8,16 1705:11 1706:12 1709:20 1713:25 1719:10,19 1723:2 1735:4,9 1737:20 1738:5,17,18 1753:22 1755:17 1773:13 1774:5</p>	<p>1778:15 1784:23 1786:8 1789:23</p> <p>stating [1] 1585:17</p> <p>station [7] 1661:18 1664:6 1690:10 1718:5 1780:4 1786:14 1787:19</p> <p>station's [4] 1601:6,10 1701:5 1784:11</p> <p>stations [3] 1735:11 1787:14,14</p> <p>status [1] 1663:20</p> <p>stay [3] 1695:14 1731:17 1731:22</p> <p>stealth [1] 1703:12</p> <p>steam [1] 1772:3</p> <p>stenotype [1] 1794:7</p> <p>steps [1] 1781:22</p> <p>stick [2] 1731:11 1776:21</p> <p>still [10] 1616:16 1635:12 1683:25 1684:24 1695:10 1745:21 1748:21,22 1751:1 1763:3</p> <p>stipulate [4] 1569:23 1729:21 1732:24 1758:20</p> <p>stolen [1] 1597:17</p> <p>stop [5] 1568:1,3 1712:10 1719:20 1730:23</p> <p>storage [1] 1680:24</p> <p>story [2] 1677:11,17</p> <p>straight [2] 1643:23,24</p> <p>strange [1] 1708:18</p> <p>Standards [21] 1565:12 1568:14 1569:6 1570:14 1570:18,23,25 1571:6,12 1571:18 1572:4,8,13 1574:6,14 1577:22 1578:8 1578:20 1609:25 1610:8 1610:16</p> <p>Street [1] 1625:13</p> <p>strengthen [1] 1573:15</p> <p>stress [1] 1719:14</p> <p>strike [1] 1777:7</p> <p>strip [1] 1662:16</p> <p>strong [4] 1615:23 1616:18 1708:21 1753:24</p> <p>strongly [1] 1675:2</p> <p>struggle [2] 1594:20 1677:19</p> <p>struggles [1] 1594:21</p> <p>Stuart [4] 1628:6,13,21 1782:15</p> <p>studies [25] 1565:12 1568:14 1569:6 1570:14 1570:18,23,25 1571:6,13 1571:18 1572:5,8,13 1574:6,15 1577:22 1578:8 1578:20 1601:25 1607:11 1607:13 1609:25 1610:8 1610:16 1782:14</p> <p>study [9] 1564:17 1573:3 1573:11 1577:20 1601:23 1604:20 1607:12,12 1661:17</p>
---	--	---	--	--

stuff [1] 1749:3	1616:6 1662:18	term [6] 1579:16 1598:13	thrown [6] 1614:17	1631:11 1632:5 1640:10
styled [1] 1716:9	Susan [3] 1655:11,15	1652:8 1675:23 1710:10	1615:5,9,17 1616:13,14	1648:18
subcontractor [1]	1656:6	1710:15	thrust [1] 1657:9	transcript [11] 1716:7
1672:11	susceptible [2] 1608:2	terminated [1] 1736:2	thundering [1] 1581:10	1716:14 1717:3,12,18
subject [2] 1581:16	1608:7	termination [1] 1756:2	Thursday [1] 1562:12	1718:2,13 1726:9,13
1736:14	sworn [6] 1761:24 1762:1	terms [6] 1599:6 1629:15	ties [1] 1576:16	1792:3 1794:17
submit [1] 1616:7	1762:5 1766:9 1792:14	1662:25 1663:4 1737:12	timely [1] 1784:3	transcription [1] 1794:9
submitted [1] 1760:9	1793:8	1738:14	times [5] 1663:9 1682:11	transcripts [2] 1606:5
subordinate [1] 1712:25	syndicate [2] 1623:19	Terrace [2] 1646:14	1683:18,19 1701:6	1726:16
subpoena [2] 1602:8	1626:4	1650:3	tired [3] 1668:21 1762:25	transfer [5] 1693:7,17
1684:8	syndicated [1] 1642:1	testified [9] 1658:22,25	1776:22	1708:6 1709:16 1715:3
subscribed [1] 1792:14	syndication [4] 1623:18	1659:8,10,11 1682:10	title [1] 1755:18	transition [3] 1573:21
substance [2] 1731:12	1627:16 1642:3,6	1710:15 1719:19 1720:4	titled [1] 1655:12	1594:17,23
1750:2	system [3] 1596:22,23	testify [4] 1676:2,4	today [13] 1617:14	translated [2] 1612:2
substantial [3] 1594:25	1740:17	1717:2 1748:19	1630:19 1634:24 1690:1	1728:12
1657:8 1701:5	systematically [1]	testifying [3] 1659:5	1700:3 1729:19 1730:2,8	translation [21] 1611:4
substitute [1] 1660:10	1709:23	1675:21 1676:3	1730:11 1731:18,23	1611:7,13,16,18 1612:24
subtlety [1] 1665:5		testimony [10] 1658:5	1732:18 1776:12	1613:5,9,10,13,19,21,23
success [1] 1701:5	-T-	1658:17 1659:13 1682:21	together [4] 1652:18	1614:3,3,9 1716:7 1717:2
successful [4] 1706:24	table [2] 1591:22 1660:17	1683:23 1684:24 1710:17	1666:7 1735:19 1751:23	1725:25 1726:1,23
1706:25 1707:1,2	Tactical [1] 1592:8	1723:1 1753:2 1792:4	Tom [6] 1620:5 1636:6,7	transpired [1] 1713:15
such [7] 1687:18 1697:16	takes [2] 1594:24 1753:5	thank [11] 1585:1,2	1641:22 1649:16 1653:15	trap [1] 1600:6
1698:7 1700:23 1712:25	taking [2] 1562:21	1587:3 1592:5 1617:18	tomorrow [3] 1728:17	travel [1] 1713:19
1719:13 1786:17	1750:20	1677:25 1715:12 1736:9	1759:12 1772:1	Treasury [2] 1721:2,10
sue [1] 1597:16	talent [1] 1701:12	1749:2 1774:4 1790:24	tone [1] 1762:23	treaty [1] 1735:13
suggest [3] 1684:6	talks [2] 1691:20 1700:6	thanks [3] 1577:10	tonight [4] 1728:1,3,10	tremendous [3] 1616:6
1712:10,11	tape [47] 1617:13,16,16	1583:21 1586:18	1728:17	1701:11 1785:6
suggested [2] 1666:22	1617:16 1638:5,6,10	themselves [1] 1657:14	Tony [5] 1669:22 1672:5	tried [5] 1696:21 1697:9
1666:23	1716:12,18,25 1717:1,11	Theo [3] 1625:10 1634:16	1672:17 1707:23,24	1704:25 1705:3,9
suggesting [1] 1764:23	1717:12,15,16 1718:22	1634:17	too [7] 1644:19 1669:16	trip [1] 1712:8
suggestion [1] 1712:7	1718:25 1719:4,8,25	theory [1] 1786:12	1709:11 1762:9 1780:25	trouble [1] 1576:8
Suite [2] 1563:5,12	1720:12 1721:4,14,18,20	thereby [2] 1667:10,11	1785:11 1787:8	true [41] 1566:5 1567:11
Sullivan [4] 1655:12,16	1723:4 1724:10,18,21	therefore [2] 1595:24	took [5] 1591:20 1617:4	1569:20 1600:2 1657:3
1656:7,10	1725:2,5 1726:10,16,19	1757:5	1711:22 1712:12 1752:15	1659:1 1664:15 1665:16
Sullivan's [1] 1575:21	1727:6,12,20 1728:2,10	Thereupon [1] 1791:19	tool [2] 1596:20 1597:15	1672:5,16 1681:2,4,8
summarizing [1]	1728:15,18,19 1729:18	thick [2] 1757:23 1758:3	tools [2] 1596:16,21	1692:22 1693:5,21,23,24
1778:12	1729:20 1730:11,12	thinking [3] 1584:20	top [6] 1613:15 1625:6	1693:25 1694:4,5 1697:11
summary [7] 1572:25	1733:12	1697:2 1740:11	1654:5 1679:22 1680:22	1697:12 1700:18 1704:21
1573:2,2,7,8 1691:18,21	taped [3] 1617:7,10	third [2] 1595:18 1761:5	1683:1	1705:15 1710:1 1712:2
Superman [3] 1705:16	1726:17	Thomas [3] 1618:6,18	Toricelli [1] 1675:3	1713:2,4 1762:8 1765:21
1705:17 1706:8	tapes [6] 1722:16 1764:6	1640:7	touch [2] 1581:1 1760:17	1766:1 1770:24 1771:19
support [12] 1571:6	1764:9,16 1768:22,25	thorough [1] 1621:7	tourism [1] 1674:20	1771:22 1774:9 1775:4
1580:9 1595:20 1597:1,5	task [6] 1705:13 1735:24	thought [4] 1707:14	toward [1] 1596:17	1782:5 1792:3 1794:8
1597:15,23 1670:7,9	1735:25 1736:5,14	1709:2 1756:19 1783:10	Tower [12] 1623:2	trust [4] 1623:8 1652:19
1672:1 1711:19 1755:15	1741:21	thousand [3] 1646:13	1632:15,17,20,23 1648:7	1714:4 1756:23
supported [2] 1670:10	Tavernier [2] 1635:18	1683:17,18	1648:11,22 1649:2,3,11	1766:1 1770:24 1771:19
1742:24	1635:19	thousands [9] 1597:12	1650:20	1771:22 1774:9 1775:4
supporting [3] 1691:18	taxpayers' [1] 1696:5	1597:13 1625:24 1629:18	Tower's [1] 1672:6	1782:5 1792:3 1794:8
1691:21 1761:15	team [1] 1701:8	1630:7,16,17 1688:7	township [1] 1619:5	trustee [6] 1618:19
supportive [2] 1708:16	technically [1] 1663:12	1740:5	tractor [1] 1672:14	1623:8 1624:7 1626:2
1708:17	technique [1] 1780:17	threat [1] 1789:3	trading [1] 1724:23	1628:6 1640:20
supports [1] 1577:6	Tejera [7] 1639:8,13,15	three [14] 1580:22 1599:8	trafficking [1] 1597:17	trustees [1] 1739:11
supposed [2] 1688:13	1639:16 1643:4,5,10	1642:8 1657:10 1662:25	transaction [22] 1618:20	truth [3] 1568:9 1765:24
1746:1	Telecommunications	1663:1,9 1710:18,20,25	1620:16,23 1625:3 1626:9	1766:6
supposedly [1] 1717:12	[1] 1735:10	1734:1 1737:4,9 1774:14	1626:25 1628:4,24 1629:9	truthful [2] 1771:8,12
surprise [1] 1779:1	telephone [1] 1781:4	through [21] 1580:16	1633:22 1638:14 1640:3	truthfulness [5] 1765:11
surprised [1] 1791:3	television [4] 1655:12	1591:25 1604:15 1613:7	1643:11 1646:17,18,22	1771:5 1778:3 1787:3
surrounded [1] 1677:2	1687:5 1717:16 1733:16	1630:5,12,13 1640:12,24	1647:9,20 1649:11 1650:1	1788:6
surveys [5] 1778:24	telling [2] 1587:7 1659:7	1642:18 1691:9,13	1652:23 1654:7	try [7] 1594:9 1596:22
1779:2,7 1781:19,23	tend [2] 1573:14 1605:19	1694:23 1700:13 1702:12	transactions [12] 1618:4	1662:15 1755:20 1756:3
survival [2] 1573:5,12	tenor [1] 1617:2	1719:15 1743:2 1764:1,5	1618:7 1619:23 1621:3,9	1756:11 1759:18
survive [4] 1591:23,24	tens [2] 1630:15,17	1784:16 1785:13	1621:14 1629:15 1630:4	trying [14] 1568:8 1576:7
	tenure [2] 1692:22 1696:1	Throughout [1] 1695:25		1600:5 1630:9 1655:4
		throw [1] 1612:4		1682:8 1683:21 1705:16
				1706:8 1732:12 1746:4
				1765:6 1767:20,22
				Tuesday's [1] 1746:9
				turn [2] 1564:22 1656:14

<p>turned [2] 1653:2 1709:6 turning [2] 1574:18 1702:3 turnover [4] 1660:4,14 1663:23 1737:8 turns [1] 1652:7 TV [58] 1608:12,22 1656:22 1657:1,6,12,25 1658:18,23 1659:4,15,19 1662:12,16,23 1690:6 1702:25 1703:3,11 1704:9 1704:16,23 1705:2,6,13 1706:16 1708:7,15,16,19 1708:22 1709:6,9,11,13 1733:19 1734:15,19 1735:3,6,11 1736:2,15 1743:23 1751:12 1752:2 1753:24 1756:6,12 1758:15 1773:24 1778:19 1779:19 1780:6,11,24,25 1781:4 twice [2] 1695:23 1777:3 two [32] 1576:13 1591:18 1595:23 1599:7 1603:13 1604:13 1606:13 1607:7 1609:16 1614:19 1615:13 1622:8 1638:5 1647:25 1649:7,17 1651:2 1663:8 1677:19 1689:8 1709:8 1719:17 1730:16,19,22 1732:20 1734:1 1735:7 1735:15,18 1737:1 1781:20 type [7] 1600:12,13 1616:20 1632:4 1710:3 1723:7 1768:19 typical [1] 1616:17 typically [3] 1632:6,8 1701:17 tyranny [1] 1596:23</p> <hr/> <p style="text-align: center;">-U-</p> <p>ugly [2] 1698:14 1709:24 ultimate [1] 1706:15 ultimately [1] 1703:14 unaccounted [1] 1762:15 unanimous [1] 1695:24 unauthorized [1] 1754:9 uncle [2] 1672:8,10 unconcluded [1] 1750:18 under [19] 1576:20 1583:14 1592:7 1600:25 1606:19 1608:1,6 1635:25 1646:10 1656:18 1659:17 1671:21 1689:22 1714:25 1736:22 1737:9 1740:17 1775:23 1794:18 underlined [1] 1665:13 underneath [1] 1679:25 undersigned [1] 1793:6 understand [26] 1565:23 1566:1,15,19 1567:5 1570:17 1578:11 1587:10</p>	<p>1616:16 1643:15 1663:6 1665:15 1667:23 1682:10 1683:6 1688:13 1698:23 1737:22 1748:1 1752:20 1759:22 1762:15 1765:6 1765:7 1767:10 1786:7 understandings [1] 1592:25 understands [3] 1566:18 1676:16,22 understood [1] 1571:9 unethically [1] 1766:21 unfair [1] 1750:4 unfavorable [3] 1585:15 1585:22,24 unfortunately [3] 1587:22 1696:23 1759:1 unintentionally [1] 1581:13 unit [4] 1635:3,11,13,15 United [25] 1562:1 1579:4 1601:19 1655:23 1656:21 1662:11 1666:2 1666:18,18 1695:11 1703:23 1704:1,7 1706:12 1719:19 1723:1 1735:9 1737:20 1738:5,17,18 1753:22 1755:16 1784:23 1789:22 unless [2] 1576:6 1794:18 unlikely [1] 1656:12 unlimited [1] 1598:5 unpleasant [1] 1719:14 unreasonable [3] 1609:23 1610:4,5 untrue [6] 1711:6 1712:3 1713:3 1764:4 1766:21 1770:25 untruthful [1] 1776:11 unusual [1] 1741:12 up [24] 1575:24 1603:17 1626:1 1635:3,11 1659:12 1662:17 1676:21 1681:5 1697:19,19 1698:1 1710:3 1712:18 1730:20 1737:12 1738:16,21 1751:10 1759:9 1772:3 1773:20 1780:3 1782:10 updated [1] 1607:22 upset [9] 1676:8,10,14 1677:13,16,16,22,22,23 used [17] 1596:21 1623:2 1623:18 1624:25 1625:4 1631:18 1640:13 1664:7 1670:20 1671:20 1672:10 1711:18 1723:25 1754:18 1762:17 1777:14 1780:17 useful [3] 1588:4,8 1595:19 USIA [21] 1692:20 1693:7 1695:12 1706:17 1711:18,20,25 1712:24 1713:19 1714:4 1734:13 1737:5,7 1742:24 1743:8 1744:17,22 1747:23</p>	<p>1779:4 1786:10 1790:3 using [2] 1664:10 1788:20 usual [1] 1741:11 usually [7] 1592:4 1606:23 1607:3,9,10 1686:15 1757:22 utilized [1] 1784:9</p> <hr/> <p style="text-align: center;">-V-</p> <p>v [5] 1562:6 1572:24,24 1573:7,8 vacation [4] 1729:25 1730:4,5 1747:1 various [2] 1607:8 1662:11 Venezuela [1] 1685:5 Venezuelan [1] 1685:2 vengeance [1] 1594:18 venture [1] 1652:15 veracity [4] 1771:3,5 1780:17 1789:25 verbatim [1] 1679:17 verify [2] 1721:19 1753:20 version [4] 1716:19 1721:18 1728:12 1789:2 viable [3] 1662:19 1667:5 1695:14 victim [1] 1775:12 VIDEOGRAPHER [11] 1582:22 1638:4,9 1669:8 1689:9 1733:6,11 1736:6,9 1745:16 1791:16 videotape [2] 1562:14 1720:12 view [17] 1573:19 1576:22,25 1594:13,14 1600:24 1688:17 1689:4 1714:5 1733:25 1738:8 1741:25 1750:10 1766:25 1768:4 1787:7 1790:4 viewed [1] 1735:7 viewership [1] 1735:8 views [6] 1571:24 1577:3 1578:1 1581:16 1605:20 1664:7 violated [4] 1704:2,8,11 1704:13 violating [2] 1703:25 1724:23 violation [3] 1608:16 1703:11,18 violence-prone [1] 1581:13 violent [1] 1573:16 VOA [4] 1656:25 1657:24 1734:14,15 vocation [1] 1673:21 Voice [1] 1734:4 vote [11] 1695:24 1739:15 1739:20 1740:1,3,4,6,13 1740:18 1741:8,14</p>	<p>voted [1] 1739:11 votes [1] 1740:24 vouch [3] 1567:8,10 1571:19 voucher [1] 1595:5 vouches [1] 1571:6 vulgarism [1] 1615:1</p> <hr/> <p style="text-align: center;">-W-</p> <p>wage [1] 1588:11 wait [3] 1571:2 1613:8,8 waiting [3] 1670:14,18 1748:16 wakes [1] 1676:20 walking [1] 1682:3 Walter [1] 1637:9 wanting [1] 1788:17 wants [4] 1575:11 1725:9 1731:4,19 war [6] 1565:13 1569:7 1588:11 1596:20 1610:1 1610:9 warehouse [8] 1641:11 1641:13 1645:18 1646:10 1646:14 1652:18 1653:15 1653:21 Warrants [1] 1716:10 warranty [13] 1620:14 1629:7 1634:11 1638:23 1639:2,18 1645:16 1646:15 1648:3,8,19 1649:23 1653:10 Washington [2] 1662:18 1710:4 wasteful [1] 1736:16 watch [2] 1781:4,5 water [1] 1668:20 ways [1] 1762:17 weakening [1] 1690:11 wealth [3] 1594:19 1595:4 1625:17 wealthy [1] 1584:9 week [2] 1701:18 1747:2 weeks [2] 1676:7 1687:12 WEIL [1] 1563:17 welcome [6] 1592:6 1597:24 1608:10 1636:20 1636:20 1678:1 west [1] 1639:25 whatsoever [5] 1595:13 1685:4 1689:1 1757:6 1768:18 White [6] 1588:17 1589:13,23 1590:6 1682:1 1738:6 Whitewater [2] 1767:1 1767:3 whole [11] 1582:2 1606:18 1615:7 1660:2 1681:25 1682:4 1692:19 1699:6 1743:10 1747:9 1764:2</p>	<p>Wick [1] 1692:19 wielded [1] 1584:22 wife [7] 1623:9 1645:3,4 1645:7,7,8 1648:20 willing [4] 1723:5 1727:4 1732:10 1759:20 willingness [1] 1663:24 wish [1] 1731:3 wishes [2] 1585:2 1587:3 Wisnesky [4] 1622:24 1648:11,14 1649:6 witch [4] 1718:18 1719:6 1750:7 1757:4 withheld [1] 1781:20 within [3] 1693:7 1701:7 1790:14 without [10] 1667:6 1693:5 1723:3 1757:9 1759:16 1766:8 1769:6 1787:11 1790:10,19 witness [92] 1565:22 1566:19 1568:21 1569:25 1570:11 1572:20 1574:22 1575:4,6 1579:20 1582:23 1587:17 1593:6 1605:4 1609:3,10,12 1610:25 1611:10,24 1613:18 1614:12,16 1617:19,24 1621:24 1622:12 1630:21 1633:4,8 1641:6,9 1643:18,22 1644:5,8 1645:5 1669:2,4,18 1671:13 1673:12 1678:3 1682:15 1685:19 1686:2 1692:10,13 1707:7,12 1708:1 1714:11,15 1715:21 1716:18 1717:24 1721:4,8,12 1726:2,7,14 1727:11,19 1728:15,24 1729:18,24 1730:1,6,10 1731:11,21 1732:7 1742:14 1745:18 1748:25 1758:14 1759:5,8,19 1761:17 1767:7 1770:12 1771:24 1776:18 1779:10 1782:23 1788:1 1791:9 1791:18 1793:10 witnessed [1] 1711:22 wondering [5] 1600:8 1602:13,20 1692:4 1726:12 word [12] 1593:3 1597:24 1598:16 1599:10,20 1615:4 1660:10 1666:22 1681:10 1689:24,25 1705:25 words [5] 1616:19 1677:21 1769:8 1785:16 1785:18 worked [3] 1584:6 1587:6 1672:14 worker [1] 1672:15 world [1] 1759:12 worldwide [1] 1687:5 worry [1] 1761:21 worst [1] 1581:11</p>
--	---	--	---	---

worth [2] 1652:24
1783:11

write [5] 1600:13 1673:21
1708:1 1756:7 1764:21

writes [4] 1606:19,21,22
1606:22

writing [5] 1678:4
1684:6 1699:18,25 1731:8

written [11] 1569:12
1583:25 1584:18 1587:2
1590:18 1606:15 1687:8
1699:21 1756:17 1757:15
1757:21

wrong [5] 1615:7 1665:4
1675:14 1688:18 1779:24

wrote [6] 1569:21 1577:9
1603:8 1681:5 1696:24
1699:20

-X-

x [1] 1562:9

-Y-

year [23] 1603:13 1609:15
1614:15 1644:22 1662:14
1662:14,17,25 1663:1,2
1710:10,16 1737:13
1739:13,15,21 1740:16
1742:4 1749:24 1750:1,1
1760:15 1775:2

yearly [1] 1632:2

years [30] 1603:13
1605:11 1621:24 1623:10
1623:22 1624:18 1626:19
1636:24 1652:5 1656:20
1657:5,6 1662:1 1663:1
1672:9,14,25 1673:4
1710:19,20,25 1719:17
1737:4 1755:14 1766:11
1773:4 1779:5 1781:21
1790:3,8

yet [4] 1746:22 1747:1,20
1773:20

yield [1] 1788:18

Yo [1] 1731:8

York [1] 1728:14

yourself [7] 1582:25
1618:19 1620:21 1632:6
1645:21 1650:8 1758:24

-Z-

ZEDER [1] 1563:3

