

UNITED STATES DISTRICT COURT  
CENTRAL DISTRICT OF CALIFORNIA  
HONORABLE DAVID O. CARTER, JUDGE PRESIDING

- - - - -

ECHOSTAR SATELLITE CORP., et	)	
al.,	)	
	)	
Plaintiffs,	)	
	)	
vs.	)	No. SACV 03-950 DOC
	)	Day 10, Volume III
NDS GROUP PLC, et al.,	)	
	)	
Defendants.	)	
_____	)	

REPORTER'S TRANSCRIPT OF PROCEEDINGS

Jury Trial

Santa Ana, California

Wednesday, April 24, 2008

Debbie Gale, CSR 9472, RPR  
Federal Official Court Reporter  
United States District Court  
411 West 4th Street, Room 1-053  
Santa Ana, California 92701  
(714) 558-8141

EchoStar 2008-04-24 D10V3

1  
2  
3  
4  
5  
6  
7  
8  
9  
10  
11  
12  
13  
14  
15  
16  
17  
18  
19  
20  
21  
22  
23  
24  
25

APPEARANCES:

FOR PLAINTIFF ECHOSTAR SATELLITE CORPORATION, ET AL.:

T. WADE WELCH & ASSOCIATES  
BY: CHAD M. HAGAN  
CHRISTINE D. WILLETTS  
WADE WELCH  
Attorneys at Law  
2401 Fountainview  
Suite 700  
Houston, Texas 77057  
(713) 952-4334

FOR DEFENDANT NDS GROUP PLC, ET AL.:

O'MELVENY & MYERS  
BY: DARIN W. SNYDER  
DAVID R. EBERHART  
Attorneys at Law  
275 Embarcadero Center West  
Suite 2600  
San Francisco, California 94111  
(415) 984-8700  
-and-  
HOGAN & HARTSON  
BY: RICHARD L. STONE  
KENNETH D. KLEIN  
Attorneys at Law  
1999 Avenue of the Stars  
Suite 1400  
Los Angeles, California 90067  
(310) 785-4600

ALSO PRESENT:

David Moskowitz  
Dov Rubin

1  
2  
3  
4  
5  
6  
7  
8  
9  
10  
11  
12  
13  
14  
15  
16  
17  
18  
19  
20  
21  
22  
23  
24  
25

## I N D E X

WITNESSES                      DIRECT    CROSS    REDIRECT    RECROSS

BEDSER, Jeffrey

By Mr. Snyder

4

By Mr. Hagan

14

By Mr. Stone

17

## EXHIBITS

EXHIBIT NO.                      IDENTIFICATION                      IN EVIDENCE

374                      Affidavit

64

375                      Notes

36

377                      Document

52

378                      Investigative notes

61

1 SANTA ANA, CALIFORNIA, WEDNESDAY, APRIL 24, 2008

2 Day 10, Volume III

3 (1:03 p.m.)

4 (In the presence of the jury.)

5 THE COURT: We're back in session.

6 Counsel, thank you for your courtesy. If you'll  
7 be seated, this is the redirect examination by Mr. Snyder on  
8 behalf of EchoStar -- strike that -- on behalf of NDS. My  
9 apologies.

10 MR. SNYDER: Thank you, Your Honor.

11 JEFFREY BEDSER, DEFENSE WITNESS, PREVIOUSLY SWORN

12 RESUMED THE STAND

13 REDIRECT EXAMINATION

14 BY MR. SNYDER:

15 Q. Good afternoon, Mr. Bedser.

16 A. Good afternoon.

17 Q. During the examination by EchoStar's lawyers, I think  
18 there might have been a little uncertainty and maybe even  
19 confusion about some of the chronology.

20 Could you remind the jury when you did this  
21 investigation for DirectTV?

22 A. We were engaged September 2002, and we completed by  
23 November of 2002.

24 Q. And after November 2002, did you do any further work on  
25 this investigation?

1 A. Clarification -- company or personally?

2 Q. The company or you personally.

3 A. Neither.

4 Q. Now, Mr. Hagan asked you whether at some point the  
5 News Corporation purchased an interest in DirecTV. Do you  
6 recall that?

7 A. Yes.

8 Q. Was that after the investigation was concluded?

9 A. Yes.

10 Q. Did that have any impact on the investigation at all?

11 A. No.

12 Q. Since it was after the investigation was concluded,  
13 could it have had any impact on the investigation?

14 A. No.

15 Q. And I believe you testified earlier that when the  
16 investigation was going on, you were actually aware that  
17 EchoStar and DirecTV had an agreement to merge?

18 A. Yes.

19 Q. Now, Mr. Hagan also asked you whether someone from NDS  
20 had asked you to destroy documents. Do you recall that?

21 A. Yes.

22 Q. Has anyone from NDS ever asked you to destroy any  
23 documents?

24 A. No.

25 Q. Okay. Could you describe for the jury your -- the

1 company's document retention policies?

2 A. Our document retention policy for both hard documents  
3 as well as electronic documents is roughly a three-year  
4 period. It's a three-year period that is normally enforced  
5 when we have storage issues for the documents themselves,  
6 physical documents, or space on the file server for the  
7 electronic documents.

8 Q. So based on the dates of this investigation, at what  
9 point under your normal business practice would documents  
10 related to this investigation have been destroyed?

11 A. 2005, 2006.

12 Q. And before that date, did anyone from EchoStar or  
13 NagraStar issue a subpoena to ICG asking you to retain these  
14 materials?

15 A. No.

16 Q. Did you ultimately see a subpoena in this case?

17 A. Yes.

18 Q. Okay. And what did you do to comply with it?

19 A. We searched not only all of our physical records as  
20 well as our electronic records for anything that complied  
21 with the court order.

22 Q. And were the documents that we've seen today some of  
23 the materials that you were able to collect?

24 A. Yes.

25 Q. Okay. And were you able to find the reports that you

1 generated as part of this investigation?

2 A. The reports that are present today, yes, are the ones  
3 that we recovered.

4 Q. And I believe we went through the November 14th report,  
5 which we'd marked as Exhibit 29?

6 A. Yes.

7 Q. And Mr. Hagan asked you whether the underlying  
8 information for your conclusions might have been lost. Does  
9 that report identify the bases for your conclusions?

10 A. Yes.

11 Q. So we do -- the jury does have that information, right?

12 A. Yes. The underlying information in the form of the  
13 actual printouts or electronic copies of the posts that are  
14 referenced in the report, we -- were no longer available.

15 Q. So all we're missing is the actual posts?

16 A. Yes.

17 Q. Now, Mr. Hagan also asked you some questions about  
18 whether you still strongly believe that the conclusions in  
19 those reports are accurate. Do you recall that?

20 A. Yes.

21 Q. But he didn't want to give you an opportunity to  
22 explain that --

23 A. Yes.

24 Q. -- and it seemed like you wanted to do that. Could you  
25 explain why you believe that the conclusions in the reports

1 are still accurate?

2 A. The conclusions in the report indicate that there are  
3 discussions of various postings by different people making  
4 different allegations on the Internet. We believe that  
5 those postings were made on the Internet by those screen  
6 names at those times and dates as we discovered them.

7 We didn't draw any conclusions that -- because we  
8 didn't have any supporting evidence -- that demonstrated  
9 that those people were in fact those screen names as  
10 alleged. However, the fact that those postings were made  
11 and those postings said those things, yes, that is accurate,  
12 and that's what we were attesting to: that the information  
13 in the report is accurate as in this particular screen name  
14 posted this information on this website at this time which  
15 made this allegation.

16 We were representing that the information in the report  
17 is accurate as to the various postings or accurate that as  
18 we recorded them that the posting allegations were recorded,  
19 et cetera. That's basically the information that we were  
20 validating in our summary.

21 Q. Now, one of the conclusions that EchoStar's lawyer  
22 referred to was the link between Mr. Tarnovsky and certain  
23 Internet aliases. Do you recall that?

24 A. Yes.

25 Q. And do you still believe that it is accurate to say

1 that there was a link between Mr. Tarnovsky and those  
2 aliases?

3 A. As far as the information that we had available from  
4 the Internet sources, yes.

5 Q. Okay. But that -- was that information that was  
6 provided to you by DirecTV?

7 A. No.

8 Q. So what was -- what is the link that you're referring  
9 to?

10 A. The link is the link purported by members of the piracy  
11 community -- I believe in the November 14th report it  
12 details it -- that indicate that the link between  
13 Christopher Tarnovsky and the Nipper pseudonym are made by  
14 those persons and stated on those forums, which is what we  
15 were reporting to. So it was a link produced by other  
16 people in their discussions about this issue.

17 Q. And those are the postings by Charles Perlman, GS2?

18 A. Yes.

19 Q. And the posting by Reggie Scullion?

20 A. Yes.

21 Q. And the postings by Dean Love?

22 A. Yes.

23 Q. And that's the full extent of the information on which  
24 you were relying; is that right?

25 A. That's correct.

1 Q. Now, one of the conclusions that you reached in the  
2 report -- and again I'm looking at Exhibit 29 -- and  
3 starting on the page headed "Guggenheim," which is  
4 ICGP04549, there was information on the Internet that  
5 Mr. Guggenheim may have provided information to specify  
6 members of the hacker community on hacking Nagra cards, the  
7 ROM 10 dump. Do you recall that?

8 A. Yes.

9 Q. Would it have affected your conclusions to know  
10 that -- well, let me withdraw that.

11 At the time, Mr. Guggenheim was the CEO of NagraStar?

12 A. Yes.

13 Q. Would it have affected your conclusions to know that at  
14 the same time Mr. Reggie Scullion was a paid informant for  
15 NagraStar or EchoStar?

16 A. It -- certainly would have taken into consideration in  
17 looking at the evidence.

18 Q. Would it have affected your conclusions to know that  
19 Dean Love was a paid informant for EchoStar and NagraStar?

20 A. Yes.

21 Q. Would it have affected your conclusions to know that  
22 Charles Perlman was a paid informant for NagraStar/EchoStar?

23 A. Yes.

24 Q. Now, as part of your investigation -- and again, we're  
25 focused on those two-and-a-half months in 2002 when EchoStar

1 and DirecTV had an agreement to merge.

2 Did EchoStar or NagraStar provide you with any  
3 information about Mr. Perlman?

4 A. No.

5 Q. Did they provide you any information about  
6 Reggie Scullion?

7 A. No.

8 Q. Did they provide you any information about Dean Love?

9 A. No.

10 Q. Did they provide you with any of the hard drives or  
11 other electronic material for any of those individuals?

12 A. No, they did not.

13 Q. Now, Mr.-- plaintiffs' counsel also asked you some  
14 questions about Mr. Love's hard drives and NDS's access to  
15 those. Do you recall those questions?

16 A. Yes.

17 Q. Did anyone ever tell you that NDS never had access to  
18 the originals of any of Dean Love's computers?

19 A. No.

20 Q. Did anyone ever tell you that those -- that NDS only  
21 was given partial access to copies of those computers after  
22 they were seized by law enforcement?

23 A. No.

24 Q. And did anyone ever tell you that the review of those  
25 computers had to be interrupted after child pornography was

1 found on those computers?

2 A. No.

3 Q. Now, finally, Mr. Bedser, you were asked some questions  
4 about Chris Tarnovsky's computers. And he asked whether as  
5 part of your investigation you had access to  
6 Chris Tarnovsky's computers or images of those computers.  
7 Do you recall that?

8 A. Yes.

9 Q. Who was the object of your investigation?

10 A. Chris Tarnovsky.

11 Q. And DirectTV was your client?

12 A. Through a proxy from counsel and TDI, yes.

13 Q. So would it have been common for you to have access to  
14 the computers of the adversary, if you will?

15 A. No.

16 Q. It would be surprising if you did, wouldn't it?

17 A. Yes.

18 Q. Did anyone ever tell you that you had -- that in the  
19 context of this litigation that Mr. Tarnovsky's computers  
20 were, in fact, imaged?

21 A. Not until today.

22 Q. Did anybody ever tell you that in the context of this  
23 litigation all of those computers were reviewed for  
24 responsive documents, and those documents were turned over?

25 A. Again, not until today.

1 Q. Well, actually, that sort of raises an important point,  
2 Mr. Bedser. Plaintiffs' counsel pointed out that ICG has  
3 been retained by NDS.

4 A. That's correct.

5 Q. Do you know the scope of that engagement?

6 A. I do not, and the reason I do not is because the -- I'd  
7 already been subpoenaed in this particular case by EchoStar,  
8 and basically we established a corporate firewall, if you  
9 will, between myself and Jim Emerson, head of the antipiracy  
10 group. Jim was not involved in this matter, was not working  
11 with the DirectTV information in 2002, and I was the last  
12 person who's still working for the firm who actually had an  
13 involvement. So we basically -- he took the role of working  
14 for NDS directly in this matter, and I took the role of  
15 dealing with the 2002 report.

16 Q. So have you personally ever done any work for NDS?

17 A. No, I have not.

18 Q. And have you had any involvement whatsoever in the work  
19 that ICG is doing in this case?

20 A. No, I have not.

21 Q. Let's turn back for just one more minute on the  
22 investigation that you did do, because I think it's  
23 important that the jury have this context.

24 As part of the work that you did, did you ever develop  
25 any evidence that Chris Tarnovsky was involved in EchoStar's

1 satellite piracy?

2 A. No.

3 Q. Did you ever develop any evidence that George Tarnovsky  
4 was involved in EchoStar satellite piracy?

5 A. No.

6 Q. Did you ever develop any evidence that NDS was involved  
7 in EchoStar satellite piracy?

8 A. No.

9 MR. SNYDER: Thank you, Mr. Bedser. No more  
10 questions.

11 THE COURT: Recross.

12 MR. HAGAN: Yes, Your Honor.

13 THE COURT: This is Mr. Hagan on behalf of  
14 EchoStar.

15 RECCROSS-EXAMINATION

16 BY MR. HAGAN:

17 Q. Good afternoon, Mr. Bedser.

18 A. Good afternoon.

19 Q. Your role with ICG is the president and chief operating  
20 officer; is that correct?

21 A. That is correct.

22 Q. And ICG is being paid, the company that you're the  
23 chief operating officer of, ICG is being paid by the  
24 defendants now in this case, correct?

25 A. Yes.

1 Q. And your testimony earlier is that you hope that ICG  
2 continues to get work from the defendants after this case?

3 A. Yes.

4 Q. Correct?

5 You have a financial interest in the company that  
6 you're the president and COO of, correct?

7 A. Yes, I do.

8 MR. HAGAN: Thank you.

9 THE COURT: All right. Sir, we're going to place  
10 you -- what city are you located in?

11 A. The company's located in Princeton, New Jersey.

12 THE COURT: Are you on the East Coast?

13 THE WITNESS: Yes.

14 THE COURT: For those persons inside the  
15 continental United States, we're putting you on 48-hour  
16 call. I doubt we'll need you.

17 THE WITNESS: Okay.

18 THE COURT: But in case you're needed, I don't  
19 want to delay the jury nor this trial. You'll be expected  
20 back within 48 hours after you receive the notice.

21 THE WITNESS: Okay.

22 THE COURT: Thank you very much.

23 You may step down.

24 THE WITNESS: Thank you.

25 (Witness steps down subject to recall.)

1 THE COURT: Counsel, your next witness, please.

2 MR. STONE: Thank you, Your Honor.

3 Richard Stone for NDS.

4 The defendants call J.J. Gee.

5 THE COURT: J.J. Gee, please.

6 Thank you, sir.

7 If you would raise your right hand, please.

8 JERRY LEE GEE, DEFENSE WITNESS, SWORN

9 THE WITNESS: Yes, I do.

10 THE COURT: Thank you, sir.

11 If you would please be seated in the witness box.

12 Thank you, sir.

13 Would you be kind enough to state your full name  
14 for the jury.

15 THE WITNESS: Jerry Lee Gee. I also go by the  
16 name of J.J.

17 THE COURT: J.J. Gee.

18 THE WITNESS: Yes, sir.

19 THE COURT: Or Gerald Lee Gee?

20 THE WITNESS: Jerry Lee.

21 THE COURT: Jerry Lee Gee.

22 THE WITNESS: Yes, sir.

23 THE COURT: Sir, would you spell your last name.

24 THE WITNESS: G-E-E.

25 THE COURT: Thank you very much.

1                   Counsel, this is direct examination by Mr. Stone  
2 on behalf of NDS.

3                   MR. STONE: Thank you, Your Honor.

4                                   DIRECT EXAMINATION

5 BY MR. STONE:

6 Q. Good afternoon, Mr. Gee.

7 A. Good afternoon.

8 Q. We've met before?

9 A. Yes, we have.

10 Q. Three of your depositions, I believe?

11 A. Yes.

12 Q. Can you tell the folks when you began working at  
13 NagraStar?

14 A. I began working at NagraStar in January of 2001.

15 Q. And your title at that time was what?

16 A. I was a special projects investigator.

17 Q. And did you report directly to Mr. Guggenheim?

18 A. Yes, I did.

19 Q. And was one of your responsibilities to investigate  
20 piracy?

21 A. Yes, it was.

22 Q. And then your title changed in the fall of 2006,  
23 correct?

24 A. It was about that time, yes.

25 Q. And currently you're the director of field security and

1 investigations for NagraStar, right?

2 A. Yes.

3 Q. And one of your jobs back when you started in 2001 was  
4 to track down the person behind the so-called Nipper  
5 postings on the Internet from December 2000, correct?

6 A. That's correct.

7 Q. And your department, the field security department, has  
8 responsibility generally for investigating piracy, correct?

9 A. For NagraStar, yes.

10 Q. And when you came on board, you took over that primary  
11 responsibility from Mr. Guggenheim, correct?

12 A. That is correct.

13 Q. And in conducting piracy investigations, NagraStar also  
14 retains private investigators, correct?

15 A. Yes, we do.

16 Q. For example, one of those companies was called  
17 Pinkerton?

18 A. That is correct.

19 Q. And one of your jobs would be to supervise or manage  
20 the private investigators as well, correct?

21 A. Yes.

22 Q. And how many different private investigative firms was  
23 NagraStar using in 2001?

24 A. Two or three if I recall.

25 Q. Would it be more like five or six? Does that sound

1 more correct?

2 A. It's very possible.

3 Q. Several firms; you would agree with that?

4 A. Yes.

5 Q. And analysis of pirate devices was also one of your job  
6 responsibilities, correct?

7 A. For a while yes, it was.

8 Q. And in the period 2000 to 2002 you would also send  
9 pirate devices to NagraCard or NagraVision in Switzerland,  
10 right?

11 A. Yes, I would.

12 Q. And they had the ability to analyze those devices,  
13 correct?

14 A. Yes.

15 Q. And then you would typically get reports back from  
16 Switzerland reporting on their analysis of various devices,  
17 correct?

18 A. Yes.

19 Q. And you probably reviewed hundreds of those over the  
20 years, correct?

21 A. Yes.

22 Q. In fact, you probably reviewed hundreds of those just  
23 from 2000 to 2002, correct?

24 A. It's possible that I did, yes.

25 Q. Now, you understand that the claim in this case --

1 you've heard a lot of accusations, but you understand the  
2 claim in this case is that NDS is somehow responsible for  
3 two postings on the Internet in December 2000, correct?

4 A. That's correct.

5 MR. STONE: If you could show the witness  
6 Exhibit 511-A, please, which is in evidence.

7 (Document displayed.)

8 BY MR. STONE:

9 Q. We've all seen 511-A before during this trial. I'm not  
10 going to belabor it, but, sir, is it correct that this is  
11 called a screen shot?

12 A. It would be a screen shot of a website.

13 Q. What does that mean, to take a screen shot of a  
14 website?

15 A. There's different tools to do it. You can go to a HTML  
16 page on a website on the Internet and make -- you're doing a  
17 copy of that page. You're using it through a PDF or maybe  
18 you're saving it in HTML, the format that it's in. You're  
19 saving an individual picture of what you're looking at.

20 Q. So it would be a photograph or a snapshot of what's  
21 posted on a particular website at any given point in time,  
22 correct?

23 A. Correct.

24 Q. And in 2000, your department or Mr. Guggenheim's  
25 department, had people monitoring the Internet for

1 piracy-related postings, correct?

2 A. The monitoring was being conducted by EchoStar's signal  
3 integrity group. Mr. Guggenheim was doing some of that work  
4 as well as NagraVision and Switzerland.

5 Q. Did you also have informants who would monitor piracy  
6 websites and provide information like screen shots?

7 A. They would have, yes.

8 Q. And then Mr. Conus in Switzerland was also monitoring  
9 the Internet for piracy information, correct?

10 A. Yes, he was.

11 Q. And do you know who obtained this screen shot at  
12 EchoStar that is marked as Exhibit 511-A?

13 A. No, I do not.

14 Q. Do you know why this particular screen shot was saved  
15 and maintained by EchoStar?

16 A. Yes, I do.

17 Q. Why is that?

18 A. It states there was a post by xbr21 and -- on  
19 December 23rd, 2000. "You want Nipper Clause here." And  
20 then he posts the Nipper Clause post on this page.

21 THE COURT: Do you want to blow that portion up,  
22 Counsel?

23 MR. STONE: Yes, if you could, please.

24 (Technician complies.)

25 THE COURT: All right. Thank you.

1 BY MR. STONE:

2 Q. All right, Mr. Gee. When was the first time you saw  
3 this screen shot?

4 A. I don't know.

5 Q. Well, when -- it was your responsibility to get to the  
6 bottom of the December 2000 Internet postings. Did somebody  
7 give you a copy of the screen shot so you could begin your  
8 duties?

9 A. I would have received it near the time that I started  
10 working for the company.

11 Q. And that was in January 2001, correct?

12 A. It probably would have been January of 2001.

13 Q. And where were you working before joining NagraStar in  
14 2001?

15 A. I was the manager of investigations at Pinkerton  
16 Investigations for Colorado. It was one of the offices for  
17 the Midwest region encompassing Colorado, Nebraska, Kansas,  
18 the Midwest states.

19 MR. STONE: Now, if you could please show the  
20 witness Exhibit 1296, which is in evidence.

21 (Document displayed.)

22 BY MR. STONE:

23 Q. Mr. Gee, I'd like you to focus on Page 4 of  
24 Exhibit 1296.

25 A. You said Page 4?

1 Q. Yeah. It should say 1296-4 at the bottom.

2 THE COURT: Well, there's two numbers. Go to the  
3 004; cause it starts otherwise at Page 5.

4 THE WITNESS: I'm there, Mr. Stone.

5 BY MR. STONE:

6 Q. Thank you, sir. And we're focusing on interrogatory  
7 No. 32, which asks "If you contend that NDS is responsible,  
8 in whole or in part, for the December 23rd and 24th, 2000,  
9 postings identified in Paragraphs 129 and 131 of the Fourth  
10 Amended Complaint, state all facts including the existence  
11 of any relevant documents, if any, that support said  
12 contention." Do you see that?

13 A. Yes, I do.

14 Q. And you recall responding to these interrogatories,  
15 right? Weren't you tasked with the role of responding to  
16 these?

17 A. I probably would have helped to compile the information  
18 for the interrogatory.

19 THE COURT: Now, just a moment. I want to see the  
20 full document.

21 Did you sign this document, sir?

22 THE WITNESS: The document was signed by  
23 Tim Frank, a lawyer for T. Wade Welch and Associates.

24 THE COURT: Thank you very much.

25 MR. STONE: The verification is

1 Exhibit 1297, Your Honor. We separately admitted it.

2 THE COURT: Could I see 1297, then.

3 MR. STONE: Absolutely.

4 THE COURT: Excuse us, ladies and gentlemen, for  
5 just a moment.

6 So you're the man, right? Signed this?

7 THE WITNESS: I signed this document, sir.

8 THE COURT: Okay. You're the responsible party.  
9 All right.

10 Counsel, you may continue.

11 MR. STONE: Thank you, Your Honor.

12 BY MR. STONE:

13 Q. I'm going to go back to 1297 in a minute, and we'll  
14 cover your signature under oath, but right now I want to  
15 focus on your response to interrogatory 32 at Page 4 of  
16 Exhibit 1296, Lines 20 through 23.

17 Now, it says: "EchoStar states Paragraphs 129 and 131  
18 of the Fourth Amended Complaint reference posts made on  
19 December 23rd, 2000, December 24th, 2000, by Chris Tarnovsky  
20 using the aliases xbr21 and NiPpEr2000, respectively,  
21 correct?

22 A. That is on here, yes.

23 MS. WILLETTS: Your Honor, we object and request  
24 that the remainder of the answer to interrogatory No. 32 be  
25 read into the record under Rule 106.

1 MR. STONE: It's in evidence, Your Honor. We  
2 already did that.

3 THE COURT: It's in evidence. And Counsel, when  
4 you get up on cross-examination, if you would like to read  
5 the entire paragraph, you may.

6 MS. WILLETTS: Thank you, Your Honor.

7 THE COURT: Please continue.

8 BY MR. STONE:

9 Q. Now, sir, this interrogatory response -- which we're  
10 going to get to your signature under oath in a minute --  
11 does not specify any other postings, correct? -- other than  
12 December 23rd and December 24th, 2000?

13 A. Within this interrogatory, that is correct.

14 Q. And it references the Fourth Amended Complaint. Did  
15 you go and look at that when you prepared these  
16 interrogatory responses?

17 A. Yes, I did.

18 Q. And the Fourth Amended Complaint didn't reference any  
19 other postings other than December 23rd by xbr21 and  
20 December 24th by NiPpEr2000; is that correct?

21 A. If I recall correctly, that's correct.

22 Q. And the Fourth Amended Complaint was filed in March of  
23 2005. Do you recall that, roughly?

24 A. I don't recall the date it was filed.

25 Q. It's five years after the postings, though, correct?

1 A. Yes. It was a time period after the postings.

2 Q. And if we could go to 1297, let's see when you signed  
3 these interrogatory responses.

4 Is that your signature?

5 A. Yes, it is.

6 Q. And you understood when you were signing this that you  
7 were stating under oath that these interrogatory responses  
8 were accurate and truthful, correct?

9 A. Yes.

10 Q. In fact, you understood it was the same oath that  
11 you're taking here in court today, correct?

12 A. That's correct.

13 Q. And, in fact, if you go to the paragraph above your  
14 signature, it states: "I have personal knowledge of most of  
15 the material matters set forth in the Responses and am  
16 informed by authorized representatives of Plaintiffs and  
17 thus declare under oath that the Responses are true and  
18 correct."

19 A. Yes, I did.

20 Q. And you understood that when you signed these, right?

21 A. Yes, I did.

22 Q. And beginning January 2001, you were the person  
23 responsible for investigating the source of the postings  
24 that you understood were at issue in the litigation, right?

25 A. I was one of the people that was tasked to do that.

1 Q. You were the lead person responsible for doing that,  
2 correct?

3 A. Yes, I was.

4 Q. In other words, as I understand it, once you took over,  
5 Mr. Guggenheim sort of took a back seat, and you were  
6 actually leading the investigation?

7 A. Eventually that was the case, yes.

8 Q. And this is signed on June 7th, 2007, correct?

9 A. Yes, it is.

10 Q. And this is based upon all the facts that you had  
11 collected as part of your investigation to that point in  
12 time, correct?

13 A. That is, correct.

14 Q. And it's the xbr21 posting that you testified caused  
15 the explosion of EchoStar piracy; isn't that right?

16 A. No, it was not the xbr21 posting; it was the original  
17 Nipper posting that was done. The xbr21 post was a copy and  
18 paste of that posting, which came after the Nipper post.  
19 The Nipper post was the cause of it. We state that in here.  
20 The NiPpEr2000, xbr21 was posting it and allowed it to  
21 spread even further out versus the websites that  
22 Chris Tarnovsky originally posted it at.

23 Q. And that's nowhere mentioned in this interrogatory  
24 response in June 7th, 2007, correct?

25 A. The NiPpEr2000 reference is in here, but the other

1 explanation is not in there.

2 Q. And it wasn't in the complaint at this point in time  
3 either, was it, sir?

4 A. I do not believe it was.

5 Q. And didn't you testify --

6 THE COURT: No, just a moment.

7 "I do not believe." Words like "could have been,"  
8 "might have been," "do not believe."

9 Do you know or not?

10 THE WITNESS: I do not know.

11 THE COURT: Okay.

12 BY MR. STONE:

13 Q. Didn't you testify that the xbr21 posting resulted in  
14 the explosion of piracy?

15 A. I did. Yes, I did.

16 Q. And you testified to that because you said the xbr21  
17 posting resulted in it going from a private group to a  
18 public forum where more people had access, correct?

19 A. That was one of the postings that I'd referenced in  
20 addition to the Nipper post.

21 Q. Well, sir, in your testimony, you never referenced the  
22 Nipper post as taking it public. You only specified the  
23 xbr21 posting; isn't that correct?

24 A. That was correct. And I was mistaken.

25 Q. And your deposition was taken on May 30th, 2007 and

1 August 7th, 2007 and August 8th, 2007, correct?

2 A. Those dates sound correct.

3 Q. Did you change your mind after you learned that NDS had  
4 located the real xbr21?

5 A. No. I looked at it closer, and the verbiage should  
6 have been it was a copy and paste instead of -- Nipper was  
7 the original poster. Xbr21 did a copy and paste of it.

8 Q. Do you contend to this day that Mr. Tarnovsky is xbr21?

9 A. No, I do not.

10 Q. And that is because NDS located the real xbr21?

11 A. That's correct.

12 Q. What facts did you have, as of June 7, 2007, that  
13 Mr. Tarnovsky was xbr21?

14 A. Chris Tarnovsky used a lot of aliases. He used Biggun,  
15 he used Von, VonRat, multiple, multiple aliases -- Nipper,  
16 Nipper Clause, NiPpEr2000. Xbr21 -- posting the code that  
17 Nipper had done that we were able to trace back to him and  
18 posting it under xbr21, we believed that he was the same  
19 person. And we were incorrect.

20 Q. And do you agree you wrongly accused Mr. Tarnovsky of  
21 being xbr21?

22 A. Yes.

23 Q. And didn't you testify that you did not correctly  
24 follow up on the xbr21 posting cause you were new to the  
25 company?

1 A. Yes.

2 Q. And did you do anything to locate the real xbr21?

3 A. Well, through our investigations we were always trying  
4 to find out who Nipper was or xbr21 -- anybody associated  
5 with the postings of this, so, yes, I would have.

6 Q. So let me get this right. For six years you had  
7 noticed that it was a cut and paste posting, but you didn't  
8 figure it out until after your deposition in August of 2007.  
9 Do I have that correct?

10 A. You do have that correct. But in the last six years  
11 this isn't the only case I've been investigating. I've  
12 investigated thousands of cases, so I was investigating this  
13 case at the same time as other cases.

14 Q. And that's because this case wasn't really any more  
15 important than millions of other Internet postings about  
16 piracy; is that true, sir?

17 A. That is not true.

18 Q. And isn't it true that this really wasn't that  
19 consequential because it was fixed with a patch in February  
20 of 2001?

21 A. It was not a patch to fix it. It was a patch that  
22 stopped the piracy for a little while, and then it continued  
23 again after that.

24 Q. So are you saying you stopped your investigation and  
25 then picked it up later?

1 A. No, I'm not saying that at all.

2 Q. Sir, isn't it correct that you gathered information  
3 during your investigation that Nipper was not Mr. Tarnovsky?

4 A. I had received some information that other people  
5 believed that maybe other people were Nipper.

6 Q. Let's talk about that information -- and by the way,  
7 did you hire any private investigators to track down xbr21?

8 A. Not at that time, no.

9 Q. At any time?

10 A. No.

11 Q. Did you go out and try to hunt down xbr21 at any point  
12 in time?

13 A. Xbr21 -- my thought was Tarnovsky, and, yes, I had done  
14 that.

15 Q. Now, let's talk a little bit about Mr. Ereiser and some  
16 information he gathered.

17 Now, Mr. Ereiser's relationship with NagraStar  
18 commenced before you began, right?

19 A. That's correct.

20 Q. And he had been an informant to NagraStar before you  
21 joined?

22 A. That is correct.

23 Q. And did you become aware that Mr. Guggenheim first had  
24 contact with Mr. Ereiser in July of 2000?

25 A. I don't know the exact date that he met him, but I knew

1 it was in 2000.

2 Q. And did you become aware that Mr. Ereiser had supplied  
3 Nagra with a piracy device that he paid \$60,000 for?

4 A. Yes.

5 Q. And you became aware of that soon after starting your  
6 position at NagraStar?

7 A. I heard about it. I heard there was a device that was  
8 purchased, but the details of it I didn't learn at the  
9 beginning of my employment, no.

10 Q. You heard about something called the black box, didn't  
11 you?

12 A. Yes, I had.

13 Q. And you heard that Mr. Ereiser had acquired a so-called  
14 black box, right?

15 A. No, I didn't know. At the beginning of my  
16 employment -- I did not know that at the beginning.

17 Q. You know that as you sit here today, don't you?

18 A. Yes, I do.

19 Q. When did you first learn it?

20 A. It would have been in 2001.

21 Q. And the black box was a device that's used to reprogram  
22 EchoStar access cards, correct?

23 A. Yes.

24 Q. But you did not conduct any investigation into finding  
25 out who was behind the black box; is that correct?

1 A. That is incorrect.

2 Q. Didn't you testify that you did not conduct an  
3 investigation into finding out who was behind the black box?

4 A. I did testify to that, yes.

5 Q. And you were just wrong?

6 A. I was mistaken, yes.

7 Q. Didn't you also testify that you could not recall who  
8 the engineer was, the technical guy behind the black box?

9 A. At the time, yes, I could not recall who that was, but  
10 when I looked back at some of my notes after my deposition,  
11 I saw that there was a person by the name of Helper who  
12 lived down in Mexico who might have been the person behind  
13 that black box, and I didn't recall that during my  
14 testimony.

15 Q. Well, your testimony was in August of 2007, correct?

16 A. Yes, it was.

17 Q. And you prepared for your testimony, didn't you, sir?

18 A. I tried to, yes.

19 Q. In fact, weren't you designated as the corporate  
20 representative to speak for EchoStar and NagraStar about  
21 these matters?

22 A. Yes, I was.

23 Q. And you understood that as the corporate  
24 representative, you had an obligation to educate yourself  
25 before coming in and testifying under oath?

1 A. Yes.

2 Q. And did you do that?

3 A. To the best of my ability on it, but with thousands of  
4 names, thousands of bits of information, you don't always  
5 recall everything.

6 Q. Did you review your notes before testifying?

7 A. Yes, I did.

8 Q. Now, you said Mr. Guggenheim conducted an investigation  
9 into who was behind the black box. Do you recall that  
10 testimony?

11 A. Yes, I do.

12 Q. And do you recall when you were deposed, you couldn't  
13 recall what Mr. Guggenheim told you about that investigation  
14 into who was behind the black box?

15 A. That's correct.

16 Q. Now, it would be important, given your role at  
17 NagraStar, to understand who might be behind such a  
18 reprogramming device, correct?

19 A. Yes.

20 Q. It was also your testimony you don't know when the  
21 black box first came into existence, right?

22 A. That is correct.

23 Q. But you know NagraStar had a black box at one point in  
24 time, right?

25 A. Yes.

1 Q. And you're also aware the black box no longer exists,  
2 right?

3 A. Yes.

4 Q. Now, during your investigation, didn't you come across  
5 information that the black box came from a pirate group in  
6 Barrie, Ontario?

7 A. There were rumors of that, yes.

8 Q. There were more than rumors, weren't there, sir?

9 A. Can you -- rumors that I recall, yes.

10 Q. Did you do anything to set out and verify those rumors?

11 A. Investigating into Barrie?

12 Q. Yes, sir.

13 A. Yes, sir. Yes, I did.

14 Q. Did you ever become aware that Mr. Nicolas at NagraCard  
15 believed the black box that Mr. Ereiser acquired was  
16 identical in method to the postings on the Internet?

17 A. I briefly recall hearing that, yes.

18 Q. In fact, the folks in Switzerland told you they thought  
19 the black box was connected to the Internet postings, didn't  
20 they?

21 A. Yes, they did.

22 Q. And when they told you that, did you redouble your  
23 efforts to find out who was behind this black box that the  
24 folks in Switzerland said was connected to the postings?

25 A. I probably would have. I probably did, yes.

1           MR. STONE: Okay. If you could show the witness  
2 Exhibit 375, please.

3           (Document provided to witness.)

4 BY MR. STONE:

5 Q. You recognize 375 from your deposition, correct?

6 A. Yes, I do.

7 Q. And you testified these are your investigative notes,  
8 correct?

9 A. Yes, they are.

10 Q. And you try to be as accurate as possible when you take  
11 down information for your investigative notes, correct?

12 A. Yes, I do.

13 Q. And you maintain these in the course of your work at  
14 NagraStar?

15 A. Yes.

16           MR. STONE: Your Honor, at this time I would move  
17 Exhibit 375.

18           THE COURT: Any objection?

19           MS. WILLETTS: No, objection, Your Honor.

20           THE COURT: Received.

21           (Exhibit No. 375 received in evidence.)

22 BY MR. STONE:

23 Q. Up at the top, there's a name -- David Lloyd.

24           Do you know who Dave Lloyd is?

25 A. Yes, I do.

1 Q. Okay.

2 A. Dave Lloyd's a pirate, a former satellite pirate in --  
3 I think it was the province of Manitoba in Canada.

4 Q. And Mr. Lloyd was a pretty big player in Canadian  
5 piracy. Is that a fair statement?

6 A. Yes, he was.

7 Q. If you go to the fourth or fifth paragraph down that  
8 begins with "Jim Waters." Do you see that?

9 A. Yes, I do.

10 Q. And you wrote: "Jim Waters is the Jim of the Barrie  
11 Group in Barrie, Ontario. He was the one who provided  
12 Maldonado the, quote, unlooper, close quote, as well as  
13 Ron Ereiser." Do you see that?

14 A. Yes, I do.

15 Q. And that's the same black box that Mr. Ereiser  
16 obtained. Do you recall testifying to that?

17 A. I don't know if it was the same black box, but it was a  
18 black box that was -- people were rumoring had come out of  
19 that part of the country, yes.

20 Q. Well, didn't you testify that Mr. Ereiser only obtained  
21 one black box?

22 A. To my knowledge, yes.

23 Q. And don't your notes reflect that he got it from  
24 Jim Waters in Barrie, Ontario of the Barrie Group?

25 A. I'm just stating that this -- that's what I state on

1 here, yes.

2 Q. So an unlooper is another way to refer to a black box;  
3 isn't that correct, sir?

4 A. No. An unlooper is a different type of program where  
5 it resets the code on the chip so it starts to function  
6 again.

7 Q. It's used to engage in illegal satellite piracy,  
8 correct?

9 A. The unlooper is used to -- DISH Network will send down  
10 a countermeasure to the Smart Card, and the commands within  
11 the Smart Card can get into a loop. So it's not functioning  
12 properly. So the pirates will need to use a device as an  
13 unlooper with software code in order to get it to work  
14 again, and that's what an unlooper would be used for in  
15 satellite piracy.

16 Q. Well, in this trial, Mr. Ereiser has testified he  
17 obtained the black box from Omar from Mexico and sent it  
18 back to Barrie, Ontario after an electronic countermeasure.  
19 Do you recall those facts occurring?

20 A. I'm not aware of his testimony on that.

21 Q. Well, he's been an informant for quite a while,  
22 correct?

23 A. Yes, he has.

24 Q. And did he or Mr. Guggenheim tell you about this  
25 procedure where Mr. Ereiser went to Saskatoon and met with

1 Omar from Mexico and got a black box and gave it to  
2 Mr. Guggenheim, and it went to Switzerland and came back,  
3 and it went back to Switzerland and came back, and it went  
4 to Barrie, Ontario. Does that ring any bells?

5 A. A lot of that detail is more detail than I've known  
6 with the Saskatoon meeting and Omar. I just knew they got  
7 it from Ron Ereiser, and Mr. Guggenheim sent it to  
8 Switzerland.

9 Q. And you never heard that it was sent to Barrie, Ontario  
10 to be repaired after an ECM?

11 A. Um, I might have heard that, yes.

12 Q. So you did learn those facts, didn't you, sir?

13 A. It's possible, yes.

14 Q. And how did you determine that Jim of the Barrie Group  
15 was Jim Waters?

16 A. It was just a name that was put out there. Jim Waters  
17 is a fake name of the person -- that's what I found out.

18 Q. Who did you find that out from?

19 A. Oh, in my -- restated here within the Barrie Group, but  
20 also I believe that I'd heard that he was also from one of  
21 the Atlantic provinces, either New Brunswick or Nova Scotia,  
22 not just from Barrie, Ontario. So I would have heard from  
23 multiple areas that a Jim or Jim Waters was involved in  
24 piracy.

25 Q. Let's talk about these multiple sources.

1           You ever heard the name Cameron Koole?

2           A.    I do know Cameron Koole, yes.

3           Q.    Has he ever been an informant to you, sir?

4           A.    Yes, he has been.

5           Q.    Red Deer, Alberta -- is that where he resides?

6           A.    Yes, he does.

7           Q.    Was he affiliated with the Barrie Group, sir?

8           A.    I don't know. I don't recall if he was or not.

9           Q.    Mr. Koole had connections to the Barrie Group; isn't  
10          that true?

11          A.    Mr. Koole was a technical informant who had connections  
12          with a lot of different organizations and groups. He was  
13          associated with groups in Niagara Falls, Barrie, Ontario.  
14          He was in the Alberta area, so he was connected with the  
15          people in Edmonton and Calgary.

16                So if I had some place that he was associated with  
17          somebody in the Barrie Group, I would not be surprised with  
18          that, but I don't recall that.

19          Q.    And did Mr. Koole tell you that Jim of the Barrie Group  
20          was Jim Waters?

21          A.    He might have.

22          Q.    Did you ever pay any money to Mr. Koole?

23          A.    I believe I have given Mr. Koole money.

24          Q.    Now, you're under oath, sir.

25                THE COURT: Just a moment. You said, "I believe."

1 Did you or not?

2 THE WITNESS: Yes.

3 BY MR. STONE:

4 Q. Do you recall what you gave Mr. Koole money for, sir?

5 A. Yes, I do.

6 Q. What was that?

7 A. It was DirecTV documents that were posted out on the  
8 Internet.

9 Q. You paid him 5,000 for stuff that was available on the  
10 Internet?

11 A. It was stuff that was 5,000 that was on the Internet,  
12 but was also taken down.

13 Q. So it was no longer publicly available; is that right?

14 A. It was publicly available to some of the administrators  
15 and moderators of the website that it was posted to.

16 Q. And these were highly sensitive DirecTV documents  
17 regarding the P4 technology; isn't that right?

18 A. I don't know what -- what the technology was, but, yes.

19 Q. And they were stolen, were they not?

20 A. Yes, they were.

21 Q. And the person who stole them was named  
22 Igor Serebryany, and he's currently serving a prison term;  
23 isn't that right, sir?

24 A. Yes, he is.

25 Q. And you paid \$5,000 for stolen DirecTV documents to

1 Cameron Koole?

2 A. Yes, I did.

3 Q. Did you call DirecTV or NDS and inform them you had  
4 those stolen documents?

5 A. I don't know if I contacted DirecTV or not, but I did  
6 not contact NDS.

7 Q. And you understand that NDS technology is involved in  
8 the P4 card?

9 A. My understanding of the P4 card is mostly DirecTV  
10 technology.

11 Q. You said "mostly"?

12 A. Mostly, yes.

13 Q. Does it involve any NDS technology, to your  
14 understanding?

15 A. My understanding is, yes.

16 Q. And you didn't assist law enforcement in the  
17 prosecution of the gentleman who stole those DirecTV  
18 documents, did you, sir?

19 A. Didn't need to. DirecTV was able to identify almost  
20 immediately who that person was who was responsible for  
21 posting that stuff, making photocopies of it, and providing  
22 it out -- selling it out on the Internet.

23 Q. So was your answer "no"?

24 A. No, I did not.

25 Q. All right. Let's go back to the Barrie Group. The

1 Barrie Group refers to a group of pirates located in Barrie,  
2 Ontario, correct?

3 A. Yes.

4 Q. And the Barrie Group had a ROM 3 hack, didn't they?

5 A. Yes, they did.

6 Q. ROM 3 is the version that's involved in the postings on  
7 the Internet; isn't that right?

8 A. That is correct.

9 Q. And Jim or Jim Waters, you said you heard, was a  
10 pseudonym, or a fake name, correct?

11 A. That is correct.

12 Q. You said you heard that from multiple sources?

13 A. The name came up multiple times, and it was believed to  
14 be a fake name of somebody, which was very common in the  
15 piracy community. My investigation into the Barrie Group, I  
16 was dealing with individuals that were giving me fake  
17 names -- Mr. M, Mr. T -- names that I believe were --  
18 Todd -- had information that Jim Waters was associated with  
19 an arctic -- that was a snow mobile company. So there was a  
20 lot of names that I had received, and they were using fake  
21 names.

22 Q. Well, didn't you learn some of the real names of the  
23 Barrie Group members?

24 A. The name I learned was Todd.

25 Q. Pardon?

1 A. I believe it was Todd.

2 Q. Didn't you testify you were able to identify two to  
3 three people by their real names from the Barrie Group?

4 A. Eventually, yes.

5 Q. Okay. And what were those names?

6 A. At this time I don't remember them.

7 Q. Do you have investigative notes that would have the  
8 real names of the members of the Barrie Group?

9 A. They would have come through litigation that we've done  
10 in the last couple of years on those names.

11 Q. I'm sorry, sir. I didn't understand your answer.

12 A. The names that we would have obtained from those would  
13 have come from litigation that we've done over the years.  
14 And I don't recall those names that associate the Barrie  
15 Group. The only name I can remember right now is Todd.

16 Q. Did you mention a Mr. M?

17 A. I mentioned a Mr. M.

18 Q. Was that a Mr. M who was affiliated with a Barrie  
19 Group?

20 A. That was a Mr. M that was affiliated with the Barrie  
21 Group.

22 Q. Did you ever hear that there was a guy named Mike who  
23 was part of a Barrie Group?

24 A. Yes, Mike from Barrie.

25 Q. Mike Manieri, right?

1 A. What was the last name?

2 Q. Manieri?

3 A. That last name is not familiar to me.

4 Q. Do you recall that there was some legal proceedings  
5 involving the Hell's Angels that revolved around these  
6 Internet postings?

7 A. What Internet postings?

8 Q. The ones that we're all here on today, the  
9 December 2000 postings.

10 A. No, the activities of the Hell's Angels was not  
11 associated with the Internet posting. They were -- a story  
12 that I heard was that the Hell's Angels was -- were upset  
13 about not having a programmer or getting a programmer that  
14 was done. And they beat the guy that was supposed to  
15 provide it for 'em, and he didn't. And this was after the  
16 Nipper posting.

17 Q. Right after, wasn't it? It was Mike Manieri, wasn't  
18 it, sir?

19 A. No. The -- when it occurred would have been in -- I  
20 think it was December or January of -- December of 2001 or  
21 January 2002.

22 Q. Isn't what you heard, sir, that somebody in the  
23 Barrie Group named Mike or Mr. M sold a black box to the  
24 Hell's Angels and that his engineer ended up dumping the  
25 code on the Internet cause they had a fight, and then the

1 Hell's Angels were very, very unhappy that their black box  
2 was on the Internet. Didn't you hear that?

3 A. I did hear that, but the time frame was a year after  
4 the Nipper post.

5 Q. Yeah. And wasn't there a criminal trial up in Ontario  
6 against the Hell's Angels who threatened Nipper's business  
7 partner with bodily harm for the postings that we are all  
8 here on, sir?

9 A. Nipper's business partner was Allen Menard on the  
10 West Coast. The circumstance with Barrie in the RCMP  
11 case -- I don't know the details of that criminal case -- and  
12 I'm aware that -- I just know that the Hell's Angels were  
13 involved with it.

14 Q. All right. So you do know about this criminal  
15 prosecution that occurred in Ontario when the Hell's Angels  
16 threatened someone because code ended up on the Internet;  
17 isn't that right?

18 A. I'm not familiar with the prosecution of that.

19 Q. You ever heard of a gentleman named Chris Maskell?

20 A. What was the last name again?

21 Q. Maskell, M-A-S-K-E-L-L?

22 A. I have heard that name.

23 Q. And didn't you hear that in connection with that case?

24 A. No. I told you I'm not familiar with the prosecution  
25 of that case.

1 Q. Where have you heard Chris Maskell?

2 A. You -- the defense filed a document just before the  
3 trial started and had a list of some theories on where  
4 Nipper came from, and that -- I saw those names in there.

5 Q. Didn't you hear that Chris Maskell was involved in this  
6 Hell's Angel's prosecution involving the postings?

7 A. No, I did not. Again, I was not familiar with the  
8 prosecution of that case.

9 Q. And who else ever gave you information about the  
10 Barrie Group? We've talked about Cameron Koole from Red  
11 Deer, Alberta. Who else gave you information about the  
12 Barrie Group?

13 A. Mr. Maldonado.

14 Q. Mr. Maldonado. Anthony Maldonado?

15 A. Anthony Maldonado, yes.

16 Q. And did Mr. Maldonado ever tell you he had a telephone  
17 conversation about the Internet postings?

18 A. No, he did not.

19 Q. Did he ever tell you that he was upset because he had a  
20 black box whose code ended up on the Internet?

21 A. No.

22 Q. Did he ever tell you he had a conversation with  
23 Mike Manieri of the Barrie Group about why the code to his  
24 black box was now on the Internet in December 2000?

25 MS. WILLETTS: Objection. Assumes facts not in

1 evidence.

2 THE COURT: Overruled. You can answer the  
3 question.

4 Is Mr. Maldonado going to testify?

5 MR. STONE: Yes, sir.

6 THE COURT: You can answer the question.

7 THE WITNESS: No.

8 BY MR. STONE:

9 Q. Did Mr. Maldonado ever agree to wear a wire and go to  
10 Canada to help you in an investigation into the source of  
11 these Internet postings?

12 A. I don't recall him agreeing that with me.

13 Q. Do you recall him offering to do that?

14 A. No, I do not.

15 THE COURT: Now, Counsel, I think the jury knows  
16 what a wire is. All of us do, but just make certain.

17 MR. STONE: Yes. Absolutely.

18 BY MR. STONE:

19 Q. Let me see if I can refresh your recollection. You  
20 went on an FBI raid of Mr. Maldonado's residence in March of  
21 2001, correct?

22 A. Yes, I did.

23 Q. And that's two-and-a-half months after the postings  
24 that we're all here on, right?

25 A. Yes.

1 Q. And Mr. Maldonado, as a result of that raid, was  
2 arrested, wasn't he?

3 A. Yes, he was.

4 Q. And Mr. Maldonado was willing to cooperate with you in  
5 your investigation of the source of these Internet postings,  
6 wasn't he?

7 A. I do not recall that conversation with him.

8 Q. Don't you recall him offering to wear a tape recording  
9 device, a wire, and go up to Barrie, Ontario, where he got  
10 his black box device, and help you get to the bottom of  
11 this?

12 A. No.

13 Q. You're saying under oath Mr. Maldonado never offered to  
14 wear a wire and go to Canada to assist you. Is that your  
15 testimony?

16 A. My testimony is that if Mr. Maldonado did tell me that,  
17 I do not recall, but at this time I can say, no.

18 Q. You're not saying he didn't do it. You're saying you  
19 don't recall.

20 A. I don't recall him saying this.

21 Q. Can you think of any reason you wouldn't have taken him  
22 up on such an offer within two and a half months of the  
23 postings?

24 A. No.

25 Q. Do you recall he had a lawyer named Jason Lamb

1 (phonetic)?

2 A. No.

3 Q. Did you ever have any communications with a criminal  
4 defense lawyer representing Mr. Maldonado?

5 A. No.

6 Q. Did you have any other sources of information about the  
7 Barrie Group other than what you've testified to, which is  
8 Mr. Maldonado and Cameron Koole of Red Deer, Alberta?

9 A. I probably did, but I don't recall right now.

10 Q. Do you know somebody named Voyager?

11 A. Yes, I do.

12 Q. Tell the folks who Voyager is.

13 A. Voyager is a technical Internet person on the technical  
14 entity on the Internet who is a person that is a  
15 confidential source of ours.

16 Q. What's his name?

17 A. William Jansen.

18 Q. Who does he work for now?

19 A. NagraVision.

20 MR. STONE: Michael, could you many show the  
21 witness Exhibit 377.

22 (Document provided to witness.)

23 BY MR. STONE:

24 Q. Before I jump into 377, I meant to ask you, how did  
25 this Hell's Angels prosecution that you were vaguely aware

1 of come to your attention? Do you recall?

2 A. The prosecution of it I didn't recall until I saw the  
3 document that you guys had provided to us, and prior to that  
4 I -- I don't know.

5 Q. What document are you referring to, sir? I'm confused.

6 A. You guys presented a document to the -- on the  
7 Nipper -- there was a document near the beginning of the  
8 trial that referenced the Hell's Angels.

9 Q. And you never heard about that prosecution of the  
10 Hell's Angels back in 2001 and 2002?

11 A. The prosecution of it -- as I said, I'm not familiar  
12 with it. I heard about it, but I didn't know the details of  
13 it.

14 Q. That was my question. Where did you hear about that  
15 from?

16 A. I don't know.

17 Q. Informants? Pirates? Law enforcement? RCMP?

18 A. Could have been from a website -- pirate website  
19 talking about it. I don't know. All those you referenced  
20 are possible, plus more.

21 Q. Well, given the fact that you knew that there was some  
22 black box that had come from Barrie, Ontario, you knew  
23 Switzerland said it was connected to the postings, you knew  
24 that Mr. Maldonado dealt with somebody in Barrie, Ontario,  
25 correct?

1 A. That's what he told us, yes.

2 Q. There's Mike from Barrie that might be the guy who was  
3 threatened by the Hell's Angels.

4 Did you get any transcripts of that criminal trial to  
5 see whether it had anything to do with the Internet postings  
6 that we're all here on?

7 A. No, I did not.

8 Q. All right, sir. Looking at Exhibit 377, please.

9 Do you recognize these as your questions to Voyager and  
10 the responses that you got?

11 A. Yes.

12 MR. STONE: I would move Exhibit 377 at this time.

13 THE COURT: Any objection?

14 MS. WILLETTS: No, objection, Your Honor.

15 (Exhibit No. 377 received in evidence.)

16 BY MR. STONE:

17 Q. If we could show the top of the text, let's go to the  
18 very top. It says, "Questions For Voyager." That was the  
19 name of the file, correct?

20 A. Yes.

21 Q. And this was some kind of debriefing you did of your  
22 informant, William Jansen, named Voyager?

23 A. There was some questions that I'd asked to him, yes.

24 Q. Where is Mr. Jansen located now?

25 A. He's in Switzerland.

1 Q. And he's employed by NagraVision?

2 A. Yes.

3 Q. And he's a long-time pirate hacker, isn't he?

4 A. Yes.

5 Q. Did you ever learn that he was affiliated with the  
6 DISH Plex piracy group?

7 A. Yes.

8 Q. Did you ever hear that there were recorded debriefings  
9 with Mr. Jansen after he was hired?

10 A. No.

11 Q. Now, how did you get this information from Mr. Jansen?

12 A. I spoke to him.

13 Q. Over the phone? In person?

14 A. I spoke to him in person.

15 Q. Where was that?

16 A. It was at our -- the NagraVision offices in  
17 Switzerland.

18 Q. And you took contemporaneous notes while you  
19 interviewed Mr. Jansen?

20 A. Just a list of questions that I had to ask him, yes.

21 Q. Now, you asked him what can be -- I should back up.  
22 When did you have this meeting with Mr. Jansen/Voyager?

23 A. The date on the document is April 11th of 2003.

24 Q. And you asked him "What can be provided about" -- and  
25 the first point, number one, is "phone boy."

1 Do you see that?

2 A. Yes.

3 Q. You said, "Info obtained. He is brains behind Mike  
4 from Barrie. Head honcho with a main phone company and has  
5 much to lose."

6 Do you see that?

7 A. Yes, I do.

8 Q. Now, Mike from Barrie -- would that be Mike Manieri?

9 A. You've referred to him as Mike Manieri. If that's who  
10 Mike from Barrie is, then I will agree with that.

11 Q. You didn't hear of two Mikes from Barrie? You only  
12 heard of one Mike from Barrie?

13 A. I've only heard of one Mike from Barrie.

14 Q. It says, "the brains behind Mike." That would be what?  
15 The technical guy? The engineer?

16 A. Yes.

17 Q. Why were you interested in that as of April of 2003?

18 A. Um, received the information of a phone boy and wanted  
19 to know if he knew who that person was.

20 Q. Why did you care?

21 A. I'm always interested in information that I can get.

22 Q. Well, you've got seven-points on this. You've got a  
23 meeting with Mr. Jansen, Voyager, long-time hacker with a  
24 lot of info, and the number one thing you asked him about  
25 was who's phone boy, right?

1 A. It is at the top of the list, yes.

2 Q. And, actually, nowhere on here do you even mention  
3 Nipper, do you?

4 A. No, I don't. We knew that was Chris Tarnovsky, so we  
5 didn't need to find him anymore.

6 Q. We'll get to that in a minute, sir.

7 Now, the technical guy behind Mike would be the  
8 engineer, right?

9 A. Yes.

10 Q. Now, how did you learn that he went by the name "phone  
11 boy"?

12 A. I don't recall how I received the information that  
13 phone boy was associated with Mike from Barrie.

14 Q. And was the Barrie piracy group still active in April  
15 of 2003?

16 A. Yes, they were.

17 Q. Now, where it says "head honcho with a major phone  
18 company," did Voyager Jansen give you more details about  
19 Phone boy and whether he was an engineer at the phone  
20 company?

21 A. No, this was all that Voyager stated to me.

22 Q. Did you follow up on this information?

23 A. I tried. I was trying to find Phone boy.

24 Q. And you were still trying to find phone boy in April of  
25 2003, correct?

1 A. Yes.

2 Q. And you were still interested in knowing who was the  
3 brains behind Mike from Barrie, right?

4 A. Yes.

5 Q. And point No. 3 on this says, "DISH farmer believed to  
6 be behind ROM 3 hack from the East Group and part developer  
7 of StuntGuy's FAQ -- which means "frequently asked  
8 questions," right?

9 A. Yes.

10 Q. What was the ROM 3 hack?

11 A. The ROM 3 hack came after the dr7 Menard hacks with --  
12 the East Group and the West Group were competing with each  
13 other. If you had a Smart Card that you were going to  
14 program, you gave it to Menard in his distribution group,  
15 whether it's Dave Dawson, Stan Frost, Shawn Quinn, one of  
16 those guys.

17 THE COURT: Excuse me, Counsel, just a moment.

18 THE WITNESS: When they were competing with each  
19 other, if they wanted a Smart Card program, you went to  
20 someone within the dr7 group, and those are the names I  
21 listed to you.

22 THE COURT: Now, I want you to go over those names  
23 slowly. Tell us what group that they're in.

24 THE WITNESS: They're with the dr7 distribution  
25 group.

1 THE COURT: All right.

2 THE WITNESS: Shawn Quinn, Dave Dawson, Stan  
3 Frost.

4 THE COURT: Thank you.

5 THE WITNESS: And names that I did not mention  
6 were a person who went by the name of Koinvision.

7 THE COURT: Just a moment. Quinn Vision?

8 THE WITNESS: Koinvision, with a "K."  
9 K-O-I-N-V-I-S-I-O-N.

10 THE COURT: Spell it again.

11 THE WITNESS: K-O-I-N-V-I-S-I-O-N.

12 THE COURT: Now, this is the West Coast group.

13 THE WITNESS: This would have been considered part  
14 of the West Coast group, yes.

15 THE COURT: And that's dr7?

16 THE WITNESS: That's the dr7 distribution group.

17 THE COURT: All right. Just a moment.

18 You mentioned an East Coast group.

19 THE WITNESS: The East Coast group was a group  
20 that was not programming cards. They didn't have the  
21 ability to do everything that they needed, so they were  
22 using other devices.

23 Tarnovsky released with Menard a bootstrap, which  
24 was similar to a DirectTV hack that he developed when he was  
25 working with Ereiser. And from that bootstrap, it was

1 enough code on that in order for him to -- the other groups  
2 were able to take that and steal their technology and then  
3 come up with it.

4 THE COURT: All right. I'll let counsel continue  
5 on both sides.

6 I'm interested in the names, though, in the East  
7 Coast group.

8 THE WITNESS: East Coast group was the Barrie  
9 Group.

10 THE COURT: Okay.

11 THE WITNESS: And they did not have the technology  
12 that Menard had.

13 MR. STONE: We're going to get to that, sir, in  
14 just a minute.

15 BY MR. STONE:

16 Q. What was the ROM 3 hack from the East group, which was  
17 my original question?

18 A. If I recall correctly, with the ROM 3 hack they had an  
19 AVR, AVR board. They were doing an AVR3.

20 Q. What is the lab that's referenced next to that, "work  
21 the lab in Thunder Bay, Ontario"?

22 A. You're talking about DISH farmer. DISH farmer worked,  
23 I believe -- was believed to have worked in the lab for the  
24 East group. And another group within DISH farmer worked  
25 with -- Mr. Stone had mentioned DISH Plex earlier. He

1 worked with Dennis Renaud from DISH Plex. And the rumors  
2 were that he was there.

3 Q. Well, you had more than rumors. You actually had  
4 information that there was a piracy lab in Thunder Bay,  
5 Ontario, correct?

6 A. I was given that information, yes.

7 Q. And it says -- where it says on your notes, "DISH  
8 farmer believed to be behind ROM 3 hack from the East group  
9 and part developer of StuntGuy's FAQ" -- do you see that?

10 A. Yes, I do.

11 Q. How did Mr. Jansen know this?

12 A. Well, he knew from the part developer of the StuntGuy's  
13 FAQ -- the StuntGuy FAQ is -- was kind of a bible for an  
14 understanding of what was occurring with the card and the  
15 stream for people that wanted to learn how it was done, and  
16 that was developed with input from several different people.  
17 On here, StuntGuy was the person who wrote it. Credit went  
18 to DISH farmer for assistance with it. Swiss Cheese Group  
19 was given credit, Mr. Bean, and I also believe zip22 was  
20 given credit for it.

21 THE COURT: Mr. Bean?

22 THE WITNESS: Mr. Bean.

23 THE COURT: B-E-A-N?

24 THE WITNESS: B-E-A-N. It's one of the names I  
25 have on this list.

1 BY MR. STONE:

2 Q. My question was, how did Mr. Jansen know this?

3 A. I thought I was explaining that to you, Mr. Stone, that  
4 the credit that StuntGuy gave, thanking people for  
5 assistance on that. DISH farmer was one of those people.  
6 As for --

7 Q. Wait a second. Sir, are you saying that in the  
8 StuntGuy-published FAQ on the Internet, there was credit  
9 given to DISH farmer, so Mr. Jansen was simply telling you  
10 what was already available on the Internet?

11 A. Yes.

12 Q. And you flew all the way to Switzerland to hear what  
13 was on the Internet?

14 A. No, I didn't fly all the way to Switzerland to talk to  
15 Mr. Jansen about these five questions, no.

16 Q. And StuntGuy had been publishing his bible on hacking  
17 since 1999, correct?

18 A. I believe that's when he -- the date that I saw on it,  
19 yes.

20 Q. And he got help from this lab in Thunder Bay, didn't  
21 he?

22 A. That's what was rumored on it, yes.

23 Q. Did you ever accuse Mr. Tarnovsky of being StuntGuy?  
24 Do you recall that?

25 A. I thought it was possible that he was StuntGuy, yes.

1 Q. And you now know that we've found StuntGuy, right?

2 A. Yes, you did. You did something that I couldn't do.

3 Q. Sir, if we could go to Exhibit 378 now, please.

4 Do you have 378 in front of you, sir?

5 A. Yes, I do.

6 Q. And these are more of your investigative notes,  
7 correct?

8 A. Yes, they are.

9 MR. STONE: Your Honor, I move Exhibit 378 at this  
10 time.

11 THE COURT: Any objection?

12 MS. WILLETTS: No, objection. Your Honor.

13 THE COURT: Received.

14 (Exhibit No. 378 received in evidence.)

15 BY MR. STONE:

16 Q. Okay. Looking at the fourth -- fifth paragraph down or  
17 fifth line down from the top, "Jim Waters"?

18 A. Yes.

19 Q. You wrote, "Jim Waters of Barrie, Ontario fame." Do  
20 you see that?

21 A. Yes, I do.

22 Q. And down at the bottom, right above your digital  
23 signature, J.J. Gee, do you see that?

24 A. Yes.

25 Q. It says, "young Chris"?

1 A. Yes.

2 Q. Who's young Chris?

3 A. I took "young Chris" to be a personal by the name of  
4 "Little Chris."

5 Q. Is that Chris Gerlinsky?

6 A. Yes.

7 Q. That's somebody who is affiliated with Mr. Ereiser?

8 A. Yes.

9 Q. Currently paid by NagraStar?

10 A. Yes.

11 Q. Do you believe Mr. Gerlinsky to be a good source of  
12 information?

13 A. Yes, I do.

14 Q. And up at the top again, where it says, "Jim Waters of  
15 Barrie, Ontario fame" -- that would be the Barrie Group,  
16 correct?

17 A. Yes.

18 Q. Does this refresh your recollection that one of the  
19 sources of your information about Jim Waters was your  
20 consultant, Chris Gerlinsky?

21 A. I did not get this from Chris Gerlinsky.

22 Q. Why does it say "young Chris" at the bottom?

23 A. I don't know why. The name was probably mentioned. I  
24 wrote it down and didn't finish the thought.

25 Q. Now, next to Jim Waters of Barry Ontario fame it says,

1 "involved with Mark and Danny." Who are Mark and Danny?

2 A. Mark and Danny were associated with David Lloyd, who  
3 we've -- spoke about earlier. David Lloyd -- Mark and Danny  
4 had a business, a piracy business.

5 Q. Do you remember their last names?

6 A. I believe it was Danny Vilcavik (phonetic), and I don't  
7 recall Mark's.

8 Q. Let's go to Exhibit 374 if we can, please. It's in  
9 evidence.

10 (Document displayed.)

11 BY MR. STONE:

12 Q. Now, looking in the top center of the first page, it  
13 says "Report of investigation with reference to  
14 Anthony J. Maldonado and Paul Thomas St. James," correct?

15 A. Yes.

16 Q. And it was prepared for Mr. Alan Guggenheim, the CEO of  
17 NagraStar, correct?

18 A. Yes.

19 Q. And this report is about, what? 120 pages or so?

20 A. My report wasn't this large, no. This report is about,  
21 I guess, a hundred pages, yes. But this -- all of this is  
22 not just my report, no.

23 Q. Well, how many such reports of this bulk did you  
24 prepare for Mr. Guggenheim?

25 A. I don't know.

1 Q. The date on this is March 23rd, 2001, correct?

2 A. Yes, it is.

3 Q. And that's down at the bottom of the first page?

4 A. Yes.

5 Q. And that's again about two-and-a-half months or so,  
6 almost three months after the postings on the Internet,  
7 correct?

8 A. Yes.

9 Q. And this is the report of the raid on Mr. Maldonado's  
10 house that you attended, correct?

11 A. Yes.

12 Q. If you could go to the page that is marked 374-108 at  
13 the bottom.

14 THE COURT: Any objection to this being received,  
15 Counsel?

16 MR. STONE: I believe it's in evidence.

17 THE COURT: Make sure.

18 MS. WILLETTS: We have no objection, Your Honor.

19 THE COURT: All right. It's received.

20 (Exhibit No. 374 received in evidence.)

21 THE COURT: You may publish it.

22 (Document displayed.)

23 THE COURT: And the page again?

24 MR. STONE: Page 108 of the exhibit, down at the  
25 bottom right-hand corner.

1 BY MR. STONE:

2 Q. And if I understand it correctly, what we're looking  
3 at, Mr. Gee, is part of an affidavit in support of a search  
4 warrant. Do you recall that? You can look at it if you  
5 need to.

6 A. Thank you.

7 Okay. It says, "Affidavit for Search Warrant, County  
8 of Maricopa, State of Arizona."

9 Q. Go back to page 108, if you would, please, Paragraph 8.

10 A. Okay.

11 Q. It says: "In November 2000, representatives of  
12 DirecTV's signal integrity office advised the FBI of an  
13 ongoing investigation into the programming, distribution,  
14 and possession of illegally modified access cards for the  
15 DirecTV satellite system. The primary target of the  
16 investigation was Anthony J. Maldonado, a network engineer  
17 for Motorola Computer Group in Tempe, Arizona." Right?

18 A. Yes.

19 Q. When did this investigation first come to your  
20 attention?

21 A. In March.

22 Q. If you go to Paragraph 9 of the search warrant  
23 affidavit --

24 THE COURT: This is March 2001. Is that when it  
25 came to your attention, sir?

1 THE WITNESS: March 2001. Yes, sir.

2 THE COURT: 2001. Thank you.

3 BY MR. STONE:

4 Q. Looking at Paragraph 9, it says: "The results of the  
5 collective investigations by the FBI, DirecTV, EchoStar  
6 Technologies, and Motorola revealed that  
7 Anthony J. Maldonado was illegally modifying and  
8 distributing DirecTV access cards."

9 It then goes on to say: "It was further determined  
10 that beginning in approximately September, 2000, Maldonado  
11 and his partner, Paul St. James, began modifying and  
12 distributing illegal access cards for the DISH satellite  
13 system via a Mexican-based Internet website."

14 Do you see that?

15 A. Yes, I do.

16 Q. Who at EchoStar was involved in this particular  
17 investigation? Do you know?

18 A. Russ Densmore.

19 Q. And did Russ Densmore accompany you on this raid?

20 A. Yes, he did.

21 Q. And how far in advance of this raid were you informed  
22 that it was going to happen?

23 A. I don't recall. Maybe a week, maybe two weeks.

24 Q. And what was it about Mr. Maldonado that caused both  
25 you and Mr. Densmore to accompany the FBI on a raid?

1 A. Well, I started in the company in January of 2001.  
2 This would have been my first attendance to a criminal  
3 action. And it was a joint action. It was a federal  
4 action. And I would have gone down there for training.

5 Q. Where did the information come from that beginning in  
6 September 2000 Mr. Maldonado and his partner,  
7 Paul St. James, were distributing illegal access cards for  
8 the DISH satellite system?

9 A. I don't know.

10 Q. And do you recall what Mr. Densmore's title was with  
11 EchoStar at this point in time?

12 A. I believe his title was manager of signal integrity.

13 Q. Was he the most senior person in the signal integrity  
14 department at that point?

15 A. Yes, he was.

16 Q. Now, if you could go to Page 109 of Exhibit 374,  
17 there's a collection of e-mails that were taken from  
18 Mr. Maldonado's computers, as I understand it, during the  
19 raid. Do you recall that occurring?

20 A. Is this an affidavit for a search warrant?

21 Q. Yes, sir. A computer from his work. I apologize; I  
22 misspoke.

23 A. Oh, yes. It states in Paragraph 10 that these are  
24 e-mails from Maldonado's Motorola e-mail account.

25 Q. And the last e-mail on Page 109 is from Paul St. James

1 to Tony Maldonado, "Raid Canada info." It says: "This  
2 e-mail consisted of an itinerary for a trip to Toronto,  
3 Canada. The mail indicated that both Maldonado and  
4 Paul St. James were scheduled to make the trip on  
5 September 7th, 2000." Do you see that?

6 A. Yes, I do.

7 Q. And September 2000 is right around the same time that  
8 Mr. Ereiser obtained the black box that he provided to  
9 Mr. Guggenheim, correct?

10 A. I believe so.

11 Q. Now, if you could go to Page 58 of the exhibit, please.

12 THE COURT: 58? Five, eight?

13 MR. STONE: Five, eight, Your Honor.

14 BY MR. STONE:

15 Q. This is entitled "Background Briefing Information,"  
16 correct?

17 A. Yes.

18 Q. And who provided this background information for the  
19 raid on Mr. Maldonado?

20 A. Probably -- I don't know.

21 Q. Look at the very bottom paragraph on that page if you  
22 would, sir?

23 A. Okay.

24 Q. It says: "Maldonado has recently focused his piracy  
25 efforts of the DISH Network satellite system, a competitor

1 to DirectTV. Maldonado and financier partner Paul St. James  
2 allegedly paid \$80,000 to purchase the computer code to hack  
3 DISH Network access cards. It is believed that the code was  
4 purchased from an unidentified Canadian hacker." Do you see  
5 that?

6 A. Yes, I do.

7 Q. Do you know where that information came from?

8 A. No, I do not.

9 Q. If we could go to Page 3 of the exhibit, please,  
10 entitled "Details"?

11 A. I'm there.

12 Q. This is something you wrote as part of your report to  
13 Mr. Guggenheim, correct?

14 A. Yes.

15 Q. It says: "Investigator Gee accompanied Special Agents  
16 from the Phoenix, Arizona office of the Federal Bureau of  
17 Investigation and the United States Postal Service on a raid  
18 on Mr. Anthony Maldonado's residence the morning of  
19 March 22nd, 2001." Correct?

20 A. Yes.

21 Q. And then two sentences below, it says: "Gee was  
22 notified that he could enter the premises to assist in the  
23 search and interview of Mr. Maldonado after authorities  
24 deemed it was safe to enter." Right?

25 A. Yes.

1 Q. And you did do that, correct?

2 A. Yes, I did.

3 Q. You participated in an interview of Mr. Maldonado in  
4 the presence of the FBI?

5 A. Yes, I did.

6 Q. And you took handwritten notes of that interview,  
7 didn't you?

8 A. Yes, I did.

9 Q. And then you also typed up those notes into the  
10 typewritten form that begins on Page 4 of the exhibit,  
11 correct?

12 A. Yes.

13 Q. And do you recall that a number of DirecTV receivers  
14 and illegally modified cards were seized during the raid of  
15 Mr. Maldonado's residence?

16 A. Yes, I do.

17 Q. Now, if you'd go to Page 4, please.

18 And I'm looking at the second paragraph from the bottom  
19 that begins with "which he said."

20 A. Yes.

21 Q. It says: "By the end of the interview, Mr. Maldonado  
22 admitted to modifying at least 60 receivers by removing the  
23 TSOP and reading the chip and making modifications to virgin  
24 cards." Do you see that third sentence?

25 A. Yes.

1 Q. And this is something Mr. Maldonado said while you  
2 interviewed him with the FBI, correct?

3 A. Yes.

4 Q. Now, next paragraph it says: "When asked where he got  
5 the code, he said he purchased it for \$25,000 from a guy  
6 named Jim, last name unknown, in Barrie, Ontario." Do you  
7 see that?

8 A. Yes.

9 Q. And that was the Jim that you later determined was  
10 Jim Waters in Barrie, Ontario, correct?

11 A. Yes.

12 Q. Or the person using the name, Jim Waters, correct?

13 A. Person using the name, Jim Waters, yes.

14 Q. And then there's a physical description right after  
15 that sentence. Do you see that?

16 A. Yes, I do.

17 Q. And if you go to your handwritten notes -- and I'll  
18 give you the page in one second -- Page 10 of the exhibit.

19 The physical description's a little bit different.

20 Whereas the typewritten notes say that Jim is 5-foot-4, in  
21 your handwritten notes it says five-ten to five-eleven in  
22 about the middle, correct?

23 A. Yes.

24 Q. And do you believe your handwritten notes are probably  
25 more accurate, and the typewritten notes are simply a typo?

1 A. Yes.

2 Q. And the physical description was 30 to 35, brown hair,  
3 brown eyes, receding hair, mustache -- looks like  
4 "middle" -- something I can't make out.

5 Can you make that out?

6 A. A mustache that has a space in the middle that is off  
7 to the side.

8 Q. Now, go back to Page 5 -- excuse me -- Page 6 of the  
9 exhibit.

10 The second paragraph -- well, actually, the first  
11 paragraph. It says: "Mr. Maldonado said he did not know  
12 who the Mexican was, but he said St. James would.  
13 Mr. Maldonado said the Mexican was selling the receivers and  
14 cards to people in Mexico, and that is all that he knew."  
15 Do you see that?

16 A. Yes, I do.

17 Q. Did you ever follow up and ask Mr. St. James if the  
18 person from Mexico was Omar that Mr. Ereiser got the black  
19 box from?

20 A. No, I did not.

21 Q. Looking at the next paragraph, it says: "Investigator  
22 Gee asked Mr. Maldonado if he was familiar with the Nipper."  
23 Do you see that?

24 A. Yes.

25 Q. And this is about three months after the postings on

1 the Internet, correct?

2 A. Yes.

3 Q. Why were you asking Mr. Maldonado if he knew who Nipper  
4 was?

5 A. I was getting -- trying to find as much information as  
6 I could to identify who he was.

7 Q. Well, had you been told before this raid that this  
8 black box that Ereiser got and that Maldonado had were  
9 connected to the postings?

10 A. No. The information that I had before was that  
11 Chris Tarnovsky was associated with Nipper, and the more  
12 people I could find to confirm that, the more believable it  
13 is.

14 Q. So you already knew it, but you just asked  
15 Mr. Maldonado to test his truthfulness; was that what you  
16 were doing?

17 A. I was asking what his opinion was.

18 Q. And he said that he was, and also knew him by the name  
19 of Nipper Clause, correct?

20 A. Yes.

21 Q. So you didn't suggest the name Nipper Clause to  
22 Mr. Maldonado. He responded to you after you said Nipper  
23 and mentioned the name Nipper Clause first; isn't that  
24 right?

25 A. That's correct.

1 Q. And then "Investigator Gee asked him if he knew who  
2 Nipper was. Mr. Maldonado believed it was either Jim or  
3 Jim's engineer, but he was not sure."

4 Now, did you take this physical description that you  
5 had and follow up to see whether Mr. Maldonado might know  
6 the true Nipper, who was Jim, who you then figured out was  
7 Jim Waters in Barrie, Ontario?

8 A. No, I did not.

9 The next sentence in there is: "He only knew that it  
10 had to be someone who was very knowledgeable of the card,  
11 and Jim seems to have that knowledge." So he was just  
12 providing a theory on who he thought maybe that Nipper or  
13 Nipper Clause was. But he was just as aware that that post  
14 was just as important to the piracy community in getting --  
15 obtaining that information.

16 Q. Didn't Mr. Maldonado tell you that he had a  
17 conversation with the business partner of Nipper?

18 A. I don't recall that.

19 Q. Do you recall him explaining that there was a fight  
20 between Nipper and his business partner?

21 A. No.

22 Q. Did you have any other information that might allow you  
23 to track down Mr. Waters and determine whether he was Nipper  
24 or not?

25 A. At this time, I had a phone number that he -- that

1 Mr. Maldonado had communicated with Mr. Waters, or Jim -- it  
2 was Jim, last name unknown for -- but...

3 Q. Well, didn't you have the Internet nicknames that  
4 Jim Waters used, DSS King and DSS Chat?

5 A. I did have those, yes.

6 Q. So you had Internet nicknames. You had a description,  
7 and you had a phone number. Did you have any other  
8 information?

9 A. It's possible I did. It's -- I'm looking through.

10 Q. Look at Page 5 at the top.

11 A. Yes, I had his -- the address that he'd given to me of  
12 Jim's address that was being used as Discount Distributors,  
13 336 Yonge, No. 345, Barrie, Ontario, postal code L4N 4C8,  
14 and then a cell phone number.

15 Q. And then underneath that, it says: "Jim is using an  
16 address in Albany, New York, but investigator was unable to  
17 write down the address."

18 "The investigator" meaning you?

19 A. Yes.

20 Q. It says the address is in the custody of the FBI,  
21 correct?

22 A. Yes.

23 Q. Did you ever go to the FBI and try to get that  
24 Albany, New York address that you just couldn't write down  
25 at the interview?

1 A. No, I did not.

2 Q. Did you ever go visit 336 Yonge, No. 4, in Barrie,  
3 Ontario?

4 A. Yes, I did.

5 Q. And when was that, sir?

6 A. I don't know the year, but I drove up from Toronto one  
7 day and drove up to Barrie, Ontario to try and find this  
8 address.

9 Q. Now, when I asked you at your deposition on May 30th,  
10 2007, you could not recall any steps you had taken to  
11 investigate Mr. Waters; isn't that right?

12 A. That is correct.

13 Q. So in May of 2007, when you were asked under oath, you  
14 couldn't recall anything you had done to locate Jim Waters;  
15 isn't that right?

16 A. That is correct.

17 Q. But now you recall driving up to this address in  
18 Barrie, Ontario?

19 A. Yes, I do.

20 Q. And was there something that refreshed your  
21 recollection?

22 A. I went back through -- just started thinking about it  
23 more. When you presented this to me in my deposition, I  
24 couldn't tell you the last time I ever thought about Jim  
25 Waters. And it was new information to me. I hadn't thought

1 about him in a long time. Being able to recall some of that  
2 information, I recalled that I did go up to Barrie, Ontario.

3 Q. Well, and I asked you in your deposition if you had  
4 tracked down Jim Waters to find out if he was Nipper, and  
5 you said you never did.

6 A. I did not.

7 Q. And when I asked you at your deposition if there was  
8 any reason why you had not tracked down Jim Waters, you said  
9 no, no reason, correct?

10 A. At the time of my deposition, yes.

11 Q. And you took no effort to determine if any of the  
12 devices in the Maldonado report were based on the NiPpEr2000  
13 postings, right?

14 A. I did not, no.

15 Q. And didn't you also testify as the corporate  
16 representative that you didn't recall asking Mr. Maldonado  
17 if he knew who NiPpEr2000 was?

18 A. That's correct.

19 Q. In fact, you originally testified that you didn't  
20 recall having any discussion with Mr. Maldonado, right?

21 A. In my deposition, when you were asking the questions  
22 about it, I actually thought this was a case in Los Angeles,  
23 so I did not recall it until you placed this report in front  
24 of me again.

25 Q. Well, when you gave this report to Mr. Guggenheim, and

1 there's this information about Nipper, and it's a couple of  
2 months after the postings, and these are the postings that  
3 supposedly destroyed the system, did Mr. Guggenheim say,  
4 "J.J., stop everything, pull out all the stops, do whatever  
5 you have to do. Track down Jim Waters, and let's see if he  
6 really is or is not Nipper." Did he say that?

7 A. No, he did not.

8 Q. Did anyone tell you, "Take this information, pull out  
9 all the stops, get to the bottom of this"?

10 A. No.

11 Q. Now, you knew Mr. Maldonado had visited the Barrie  
12 Group in the fall of 2000, right?

13 A. I'm sorry. Ask your question again.

14 Q. Based on this report that you did, you were aware that  
15 in September and November of 2000 that Mr. Maldonado had  
16 gone to Canada to meet his supplier, Jim of Barrie, Ontario?

17 A. Yes.

18 Q. So you knew he had recent ties to this piracy group,  
19 right?

20 A. Yes.

21 Q. And didn't Mr. Maldonado offer to cooperate and assist  
22 you in getting close to the folks in the Barrie Group of  
23 pirates?

24 A. He may have, but I don't recall that.

25 Q. And if he did, you can't think of any reason why you

1 wouldn't have taken him up on his offer to cooperate?

2 A. No.

3 Q. Was the reason that these postings really weren't that  
4 serious because they had already been patched by an  
5 electronic countermeasure?

6 A. No.

7 Q. Was the reason you knew the evidence would point away  
8 from NDS?

9 A. No. At that time, we didn't even know that -- actually  
10 correction -- we did know that there was a tie between  
11 Chris Tarnovsky and NDS. But my answer is no.

12 Q. Go to Page 11, which is your handwritten notes, please,  
13 sir. And these are your notes, correct?

14 A. Yes, they are.

15 Q. Do you recall Cameron Koole, your informant, ever  
16 showing you one of the black boxes from the Barrie Group?

17 A. No, I do not.

18 Q. Do you recall him offering to sell you one?

19 A. No, I do not.

20 Q. Now, in about the middle of the page it says: "Stole  
21 code from developer in Canada." Do you see that?

22 A. Yes, I do.

23 Q. And that's what Mr. Maldonado told you, correct?

24 A. Yes.

25 Q. And didn't he tell you that his supplier, Mike, was in

1 trouble because he stole the code from the developer in the  
2 Barrie Group? Isn't that what that refers to, sir?

3 A. I don't know. There's nothing else indicating that.

4 Q. Didn't he tell that you his engineer thought he was  
5 double-dealing on him?

6 A. I don't recall that.

7 Q. Where it says "pissed system went down" -- do you see  
8 that?

9 A. Yes.

10 Q. Didn't Mr. Maldonado tell you that everyone was pissed  
11 because the engineer had posted the code on the Internet in  
12 December of 2000?

13 A. That wouldn't take the system down. That would  
14 actually make it better and make everybody else be able to  
15 do it. "Pissed system went down" is probably referring to  
16 the countermeasure that was down a month earlier.

17 Q. February 21st, 2001, right?

18 A. I don't recall the date.

19 Q. I do. It's February 21st, 2001.

20 A. Okay.

21 Q. All right. So roughly a month before then. And so did  
22 Mr. Maldonado tell you that everyone was pissed at Mike or  
23 Jim Waters and his engineer because the boxes they bought  
24 for them were now useless because the code had been posted  
25 on the Internet and then zapped by Nagra.

1 A. You just -- I just from my note here, I wrote down  
2 "pissed system went down."

3 Q. But Mr. Maldonado wouldn't be pissed if the Nagra  
4 system went down. He'd be pissed if his black box no longer  
5 worked, wouldn't he? That he just paid 80 -- or 25,000  
6 bucks for?

7 A. Or he's pissed that all his customers that he had and  
8 the countermeasure that was done took him down and hurt him.  
9 The time frame -- it doesn't also state he was able to get  
10 'em back up again, either.

11 Q. Who's stealing the code from the developer, according  
12 to Mr. Maldonado? Do you recall that?

13 A. No.

14 Q. Let's go back to Exhibit 511-A if we could for just a  
15 minute.

16 (Document displayed.)

17 BY MR. STONE:

18 Q. See where it says, "There will be no boxes any more"?

19 A. Yes.

20 Q. "There will be no more fighting amongst us"?

21 A. Yes.

22 Q. Didn't you learn that there was a fight between Jim and  
23 Barrie and his engineer, and that's what resulted in these  
24 postings?

25 A. No. There was fighting amongst the East and West

1 groups, and there was also -- I believe Al Menard called  
2 Alan Guggenheim at NagraStar and talked to him about a  
3 threat on this code. I don't know the -- recall the --

4 THE COURT: A thread on what?

5 THE WITNESS: A threat on the code.

6 THE COURT: A "thread"?

7 THE WITNESS: A threat.

8 THE COURT: A "threat"?

9 THE WITNESS: A threat.

10 THE COURT: Okay.

11 THE WITNESS: And those are the two meanings of  
12 what that is.

13 So where Nipper posted, "There will be no boxes  
14 anymore. There will be no more fighting amongst us. Learn  
15 from this and prosper. Works across the world."

16 And then he begins doing the directions.  
17 That's -- who knows why he did that.

18 BY MR. STONE:

19 Q. Well, sir, you know why: Because didn't Mr. Maldonado  
20 specifically tell you that there was a fight between his  
21 supplier and the supplier's engineer in Barrie, Ontario that  
22 led to this posting?

23 A. I do not recall him telling me that.

24 Q. So you're not saying it didn't happen. You're just  
25 saying you can't recall it as you sit here; is that right?

1 A. That's correct.

2 Q. Let's go back to Page -- excuse me -- Exhibit 374,  
3 please. And I'm focusing on Page 5 of the document.

4 A. Okay.

5 Q. And third paragraph from the bottom that begins with  
6 "He said."

7 A. Okay.

8 Q. And again, this is continuing the interview of  
9 Mr. Maldonado in the presence of the FBI, correct?

10 A. Yes.

11 Q. It says: "He said that after two week of owning the  
12 box received from Jim, DISH Network sent an ECM that took  
13 out their capabilities of modifying cards." Do you see  
14 that?

15 A. Yes.

16 Q. And so do you recall Mr. Maldonado telling you that  
17 after the ECM had issued, it wiped out the boxes?

18 A. I put it in my notes here, but I don't recall him  
19 telling me that.

20 Q. And did he tell you that that created a lot of angry  
21 people?

22 A. I don't recall the conversation that I had with  
23 Mr. Maldonado.

24 Q. Did you ever bring Mr. Guggenheim with you to interview  
25 Mr. Maldonado after this raid?

1 A. No.

2 Q. Did you ever speak to Mr. Maldonado after this raid?

3 A. No.

4 Q. Did you ever speak to any lawyer for Mr. Maldonado  
5 after this raid?

6 A. No.

7 Q. Did you ever circle back and follow up in any way with  
8 Mr. Maldonado after this raid?

9 A. No, I did not. Mr. Maldonado was being arrested, and  
10 the impression when I left the scene was that he was not  
11 gonna be charged with the satellite piracy anymore. But FBI  
12 began looking at his computers for kiddie porn.

13 Q. And did you ever follow up, though, in any way to find  
14 out what further information he might have about satellite  
15 piracy?

16 A. No, I did not.

17 Q. Did you ever interview Mr. St. James?

18 A. No, I did not.

19 Q. Did you ever ask Cameron Koole to try to get more  
20 information on the Barrie Group for you?

21 A. I may have.

22 Q. Was he able to get more information for you, sir?

23 A. It's possible that he was.

24 Q. Did you write that down anywhere?

25 A. I might have.

1 Q. Where might you have done that, sir?

2 A. In my investigative notes.

3 Q. And how would we find the notes that relate to  
4 Cameron Koole? Do you have some system so that we can find  
5 your notes of discussions with that particular informant?

6 A. Through the discovery of this investigation, I turned  
7 all that information over to you.

8 Q. So if we don't have it, it doesn't exist. Is that a  
9 fair statement?

10 A. Yes.

11 Q. All right. Go to Page 4, if you please, of  
12 Exhibit 374.

13 I'm focusing on the last paragraph on the bottom of  
14 Page 4. And the second to last sentence says: "The  
15 websites -- Mr. Maldonado met and chatted with Jim are  
16 WWW.hightechsats.com, www.canuk.com, and irc.canuk.net. Do  
17 you see that?"

18 A. Yes, I do.

19 Q. And you're aware that irc.canuk.net was hosted by  
20 Ron Ereiser, correct?

21 A. In my testimony I stated that information as incorrect.  
22 Mr. Ereiser actually hosted Stack Attack.

23 Q. So once again, information you gave under oath was  
24 simply wrong. Is that your testimony?

25 A. That was wrong, yes.

1 Q. Did you ever conduct any investigation into the  
2 Internet nicknames for Jim Waters in Barrie, Ontario of  
3 DSS King and DSS Chat?

4 A. I believe I did, yes.

5 Q. Did you ever hire any private investigators to go to  
6 Barrie, Ontario to search for Mr. Waters?

7 A. No, we did not.

8 Q. Okay. I meant to ask you before: Did anyone authorize  
9 you to pay \$5,000 for the stolen DirecTV documents to  
10 Mr. Koole?

11 A. No.

12 Q. And how much did you pay for those?

13 A. \$5,000.

14 Q. And that was within your discretion to do?

15 A. Yes.

16 Q. Okay. If we could go to the December 24th post, which  
17 is Exhibit 191, please.

18 A. And to be clear, I had nothing to do with those, to  
19 steal those documents. That was a person by the name of  
20 Igor, and they were publicly available for awhile.

21 Q. Then why did you pay \$5,000 for them, again?

22 A. We didn't have 'em.

23 Q. So they weren't publicly available anymore?

24 A. That's correct.

25 Q. Okay. You recognize Exhibit 191, I take it.

1 (Document displayed.)

2 THE WITNESS: Yes.

3 BY MR. STONE:

4 Q. And am I correct that this post contains a dump of the  
5 EEPROM code from a pirate card?

6 A. It's the -- yes, from NiPpEr2000.

7 Q. Now, did plaintiffs or the Nagra companies analyze the  
8 posted code at any point in time?

9 A. I believe they did, yes.

10 Q. And do you recall testifying that they were able to  
11 find identifying information in the code?

12 A. No. I do not recall testifying to that.

13 Q. Did NagraStar do anything to trace the person whose  
14 card was used to post this posting?

15 A. No, we did not. We didn't do that. The Smart Card  
16 number and the receiver number, when you have much  
17 information, can be manipulated and changed. So whatever is  
18 in here doesn't mean that it was the correct information.

19 Q. Did you ever learn that there was a password, a  
20 backdoor password, that is contained in the EEPROM of the  
21 ROM 3 cards?

22 A. No.

23 Q. Look at the EEPROM address E020. There's a string of  
24 numbers beginning with 85 and ending with 54.

25 A. Okay. E020?

1 Q. It's the third line down.

2 A. Yes.

3 Q. Didn't anyone ever tell you that those 16 bytes are a  
4 unique password that is found at that EEPROM address  
5 location for all ROM 3 cards?

6 A. It's possible that I did hear that at one time.

7 Q. "Possibly" when was that?

8 A. Probably near the beginning of my employment.

9 Q. And who told you that?

10 A. I don't know. I am not familiar that this is -- as I  
11 stated before, I'm not familiar -- it's a password.

12 Q. Let me get this right. You started in January of 2001?

13 A. Yes.

14 Q. Was there something more important than these two  
15 postings at that point in time?

16 A. When I started, no.

17 Q. Somebody tells you that there's unique passwords in the  
18 EEPROM portion of the ROM 3 card, right?

19 A. As I told you, I don't recall if I was told that  
20 information or not.

21 Q. I thought you said you were told that information.

22 A. It's familiar that there's a way to getting into the  
23 card. Whether this is the line that does that, I don't know  
24 that, but I know that there's a way of getting into the card  
25 from it.

1 Q. Well, when you learned this information, did you tell  
2 anyone that they should check that password against the  
3 database to find the card ID number for this posting?

4 A. No, I did not.

5 Q. Did Mr. Guggenheim, to your knowledge, direct anyone to  
6 take that password and run it against the database?

7 A. I do not know.

8 Q. Let me -- well, to this day, has anyone ever told you  
9 they're able to use that password to correlate to a card ID  
10 number?

11 A. I know that the receiver and the Smart Card number is  
12 in hex code in the Smart Card, but whether it's at Line 20,  
13 I don't know that.

14 THE COURT: Why don't you choose a time for break.

15 MR. STONE: This as very good time, Your Honor.

16 THE COURT: You're admonished not to discuss this  
17 matter amongst yourselves nor to form or express any opinion  
18 concerning this case.

19 Have a nice recess. We'll see you in about  
20 20 minutes.

21 (Recess held at 2:55 p.m.)

22 (Further proceedings reported by Sharon  
23 Seffens in Volume IV.)

24 -oOo-

25

1 -oOo-

2  
3 CERTIFICATE

4  
5 I hereby certify that pursuant to Section 753,  
6 Title 28, United States Code, the foregoing is a true and  
7 correct transcript of the stenographically reported  
8 proceedings held in the above-entitled matter and that the  
9 transcript page format is in conformance with the  
10 regulations of the Judicial Conference of the United States.

11  
12 Date: April 25, 2008

13  
14  
15 \_\_\_\_\_  
16 DEBBIE GALE, U.S. COURT REPORTER

17 CSR NO. 9472, RPR  
18  
19  
20  
21  
22  
23  
24  
25

<b>A</b>				
<b>ability</b> 19:12 34:3 57:21	<b>advised</b> 65:12	<b>antipiracy</b> 13:9	65:20,25	56:3 58:8 61:19
<b>able</b> 6:23,25 29:17 42:19 44:2 58:2 77:1 80:14 81:9 84:22 87:10 89:9	<b>affidavit</b> 3:11 65:3,7,23 67:20	<b>anybody</b> 12:22 30:4	<b>attesting</b> 8:12	62:15,15 71:6 71:10 74:7 75:13 76:2,7,18 77:2 78:11,16 78:22 79:16 80:2 81:23 82:21 84:20 86:2,6
<b>above-entitled</b> 90:8	<b>affiliated</b> 40:7 44:18,20 53:5 62:7	<b>anymore</b> 55:5 82:14 84:11 86:23	<b>Attorneys</b> 2:6,14 2:19	<b>Barry</b> 62:25
<b>Absolutely</b> 24:3 48:17	<b>afternoon</b> 4:15,16 14:17,18 17:6,7	<b>apologies</b> 4:9	<b>August</b> 29:1,1 30:8 33:15	<b>based</b> 6:8 27:10 77:12 78:14
<b>access</b> 11:14,17 11:21 12:5,13 28:18 32:22 65:14 66:8,12 67:7 69:3	<b>Agents</b> 69:15	<b>apologize</b> 67:21	<b>authorities</b> 69:23	<b>bases</b> 7:9
<b>accompanied</b> 69:15	<b>agree</b> 19:3 29:20 48:9 54:10	<b>APPEARANCES</b> 2:1	<b>authorize</b> 86:8	<b>basically</b> 8:19 13:8,13
<b>accompany</b> 66:19 66:25	<b>agreeing</b> 48:12	<b>approximately</b> 66:10	<b>authorized</b> 26:16	<b>Bay</b> 58:21 59:4 60:20
<b>account</b> 67:24	<b>agreement</b> 5:17 11:1	<b>April</b> 1:17 4:1 53:23 54:17 55:14,24 90:12	<b>available</b> 7:14 9:3 41:9,13,14 60:10 86:20,23	<b>Bean</b> 59:19,21,22
<b>accurate</b> 7:19 8:1 8:11,13,17,17 8:25 26:8 36:10 71:25	<b>al</b> 1:5,8 2:3,11 82:1	<b>arctic</b> 43:19	<b>Avenue</b> 2:20	<b>beat</b> 45:14
<b>accusations</b> 20:1	<b>Alan</b> 63:16 82:2	<b>area</b> 40:14	<b>AVR</b> 58:19,19	<b>Bedser</b> 3:4 4:11 4:15 12:3 13:2 14:9,17
<b>accuse</b> 60:23	<b>Albany</b> 75:16,24	<b>areas</b> 39:23	<b>AVR3</b> 58:19	<b>began</b> 17:12,14 31:18 66:11 84:12
<b>accused</b> 29:20	<b>Alberta</b> 40:5,14 47:11 50:8	<b>Arizona</b> 65:8,17 69:16	<b>aware</b> 5:16 31:23 32:2,5 35:1,14 38:20 46:12 50:25 74:13 78:14 85:19	<b>beginning</b> 26:22 32:9,15,16 51:7 66:10 67:5 87:24 88:8
<b>acquired</b> 32:13 35:15	<b>aliases</b> 8:23 9:2 24:20 29:14,15	<b>arrested</b> 49:2 84:9	<b>awhile</b> 86:20	<b>begins</b> 37:8 70:10 70:19 82:16 83:5
<b>action</b> 67:3,3,4	<b>allegation</b> 8:15	<b>asked</b> 5:4,19,20 5:22 7:7,17 11:13 12:3,4 52:23 53:21,24 54:24 56:7 71:4 72:22 73:14 74:1 76:9,13 77:3,7	<b>B</b>	<b>behalf</b> 4:8,8 14:13 17:2
<b>active</b> 55:14	<b>allegations</b> 8:4,18	<b>asking</b> 6:13 73:3 73:17 77:16,21	<b>back</b> 4:5 13:21 15:20 18:3 19:15 24:13 27:5 29:17 33:10 38:18 39:2,3,3 42:25 51:10 53:21 65:9 72:8 76:22 81:10,14 83:2 84:7	<b>belabor</b> 20:10
<b>activities</b> 45:10	<b>allegedly</b> 69:2	<b>asks</b> 23:7	<b>backdoor</b> 87:20	<b>believable</b> 73:12
<b>actual</b> 7:13,15	<b>Allen</b> 46:9	<b>assist</b> 42:16 49:14 69:22 78:21	<b>background</b> 68:15,18	<b>believe</b> 5:15 7:4 7:18,25 8:4,25 9:11 17:10 28:4 28:7,8 39:20 40:23,25 43:17 44:1 58:23 59:19 60:18 62:11 63:6 64:16 67:12 68:10 71:24 82:1 86:4 87:9
<b>addition</b> 28:20	<b>allow</b> 74:22	<b>assistance</b> 59:18 60:5	<b>Barrie</b> 35:6,11 37:10,11,24,24 38:18 39:4,9,14 39:19,22 40:7,9 40:13,17,19 42:25 43:1,1,4 43:15,23 44:3,8 44:14,18,20,23 44:24 45:23 46:10 47:10,12 47:23 49:9 50:7 51:22,24 52:2 54:4,8,10,11,12 54:13 55:13,14	<b>believed</b> 29:18 31:5 35:15 43:13 56:5
<b>address</b> 75:11,12 75:16,17,20,24 76:8,17 87:23 88:4	<b>allowed</b> 27:20	<b>associate</b> 44:14		
<b>administrators</b> 41:14	<b>Amended</b> 23:10 24:18 25:14,18 25:22	<b>associated</b> 30:4 40:13,16 43:18 45:11 55:13 63:2 73:11		
<b>admitted</b> 24:1 70:22	<b>Ana</b> 1:16,23 4:1	<b>Associates</b> 2:4 23:23		
<b>admonished</b> 89:16	<b>analysis</b> 19:5,16	<b>Assumes</b> 47:25		
<b>advance</b> 66:21	<b>analyze</b> 19:12 87:7	<b>Atlantic</b> 39:21		
<b>adversary</b> 12:14	<b>Angeles</b> 2:21 77:22	<b>Attack</b> 85:22		
	<b>Angels</b> 45:5,10,12 45:24 46:1,6,12 46:15 50:25 51:8,10 52:3	<b>attendance</b> 67:2		
	<b>Angel's</b> 47:6	<b>attended</b> 64:10		
	<b>angry</b> 83:20	<b>attention</b> 51:1		
	<b>answer</b> 24:24 42:23 44:11 48:2,6 79:11			
	<b>Anthony</b> 47:14,15 63:14 65:16 66:7 69:18			

58:23 59:8 69:3 74:2 <b>bells</b> 39:4 <b>best</b> 34:3 <b>better</b> 80:14 <b>bible</b> 59:13 60:16 <b>big</b> 37:4 <b>Biggun</b> 29:14 <b>bit</b> 31:15 71:19 <b>bits</b> 34:4 <b>black</b> 32:10,14,21 32:25 33:3,8,13 34:9,14,21,23 35:1,5,15,19,23 37:15,17,18,21 38:2,17 39:1 45:23 46:1 47:20,24 49:10 51:22 68:8 72:18 73:8 79:16 81:4 <b>blow</b> 21:21 <b>board</b> 18:10 58:19 <b>bodily</b> 46:7 <b>bootstrap</b> 57:23 57:25 <b>bottom</b> 22:6 23:1 49:10 61:22 62:22 64:3,13 64:25 68:21 70:18 78:9 83:5 85:13 <b>bought</b> 80:23 <b>box</b> 16:11 32:10 32:14,21,25 33:3,8,13 34:9 34:14,21,23 35:1,5,15,19,23 37:15,17,18,21 38:2,17 39:1 45:23 46:1 47:20,24 49:10 51:22 68:8 72:19 73:8 81:4 83:12 <b>boxes</b> 79:16 80:23 81:18 82:13 83:17 <b>boy</b> 53:25 54:18	54:25 55:11,13 55:19,23,24 <b>brains</b> 54:3,14 56:3 <b>break</b> 89:14 <b>Briefing</b> 68:15 <b>briefly</b> 35:17 <b>bring</b> 83:24 <b>brown</b> 72:2,3 <b>Brunswick</b> 39:21 <b>bucks</b> 81:6 <b>bulk</b> 63:23 <b>Bureau</b> 69:16 <b>business</b> 6:9 46:6 46:9 63:4,4 74:17,20 <b>bytes</b> 88:3 <b>B-E-A-N</b> 59:23,24 <hr/> <b>C</b> <b>Calgary</b> 40:15 <b>California</b> 1:2,16 1:23 2:15,21 4:1 <b>call</b> 15:16 16:4 42:3 <b>called</b> 18:16 20:11 32:10 82:1 <b>Cameron</b> 40:1,2 42:1 47:10 50:8 79:15 84:19 85:4 <b>Canada</b> 37:3 48:10 49:14 68:1,3 78:16 79:21 <b>Canadian</b> 37:4 69:4 <b>capabilities</b> 83:13 <b>card</b> 38:10,11 42:8,9 56:13,19 59:14 74:10 87:5,14,15 88:18,23,24 89:3,9,11,12 <b>cards</b> 10:6 32:22 57:20 65:14 66:8,12 67:7 69:3 70:14,24 72:14 83:13 87:21 88:5	<b>care</b> 54:20 <b>CARTER</b> 1:3 <b>case</b> 6:16 13:7,19 14:24 15:2,18 19:25 20:2 27:7 30:11,13,14 46:11,11,23,25 47:8 77:22 89:18 <b>cases</b> 30:12,13 <b>cause</b> 23:3 27:19 29:24 45:25 <b>caused</b> 27:14 66:24 <b>cell</b> 75:14 <b>center</b> 2:14 63:12 <b>CENTRAL</b> 1:2 <b>CEO</b> 10:11 63:16 <b>certain</b> 8:22 48:16 <b>certainly</b> 10:16 <b>CERTIFICATE</b> 90:3 <b>certify</b> 90:5 <b>cetera</b> 8:19 <b>CHAD</b> 2:5 <b>change</b> 29:3 <b>changed</b> 17:22 87:17 <b>charged</b> 84:11 <b>Charles</b> 9:17 10:22 <b>Chat</b> 75:4 86:3 <b>chatted</b> 85:15 <b>check</b> 89:2 <b>Cheese</b> 59:18 <b>chief</b> 14:19,23 <b>child</b> 11:25 <b>chip</b> 38:5 70:23 <b>choose</b> 89:14 <b>Chris</b> 12:4,6,10 13:25 24:19 27:22 29:14 46:19 47:1,5 55:4 61:25 62:2 62:3,4,5,20,21 62:22 73:11 79:11 <b>CHRISTINE</b> 2:5 <b>Christopher</b> 9:13 <b>chronology</b> 4:19	<b>circle</b> 84:7 <b>circumstance</b> 46:10 <b>city</b> 15:10 <b>claim</b> 19:25 20:2 <b>Clarification</b> 5:1 <b>Clause</b> 21:19,20 29:16 73:19,21 73:23 74:13 <b>clear</b> 86:18 <b>client</b> 12:11 <b>close</b> 37:12 78:22 <b>closer</b> 29:5 <b>Coast</b> 15:12 46:10 57:12,14,18,19 58:7,8 <b>code</b> 29:16 38:5 38:13 45:25 46:16 47:20,23 58:1 69:2,3 71:5 75:13 79:21 80:1,11,24 81:11 82:3,5 87:5,8,11 89:12 90:6 <b>collect</b> 6:23 <b>collected</b> 27:11 <b>collection</b> 67:17 <b>collective</b> 66:5 <b>Colorado</b> 22:16 22:17 <b>come</b> 35:4 37:18 44:9,13 51:1,22 58:3 65:19 67:5 <b>coming</b> 33:25 <b>commands</b> 38:10 <b>commenced</b> 31:18 <b>common</b> 12:13 43:14 <b>communicated</b> 75:1 <b>communications</b> 50:3 <b>community</b> 9:11 10:6 43:15 74:14 <b>companies</b> 18:16 87:7 <b>company</b> 5:1,2	14:22 15:5 22:10 29:25 43:19 54:4 55:18,20 67:1 <b>company's</b> 6:1 15:11 <b>competing</b> 56:12 56:18 <b>competitor</b> 68:25 <b>compile</b> 23:17 <b>complaint</b> 23:10 24:18 25:14,18 25:22 28:2 <b>completed</b> 4:22 <b>complied</b> 6:20 <b>complies</b> 21:24 <b>comply</b> 6:18 <b>computer</b> 65:17 67:21 69:2 <b>computers</b> 11:18 11:21,25 12:1,4 12:6,6,14,19,23 67:18 84:12 <b>concerning</b> 89:18 <b>concluded</b> 5:8,12 <b>conclusions</b> 7:8,9 7:18,25 8:2,7,21 10:1,9,13,18,21 <b>conduct</b> 32:24 33:2 86:1 <b>conducted</b> 21:2 34:8 <b>conducting</b> 18:13 <b>Conference</b> 90:10 <b>confidential</b> 50:15 <b>confirm</b> 73:12 <b>conformance</b> 90:9 <b>confused</b> 51:5 <b>confusion</b> 4:19 <b>connected</b> 35:19 35:24 40:14 51:23 73:9 <b>connection</b> 46:23 <b>connections</b> 40:9 40:11 <b>consequential</b> 30:19 <b>consideration</b>
---	--	---	--	--

10:16	28:18,23,24	36:18,20 40:25	43:16	<b>details</b> 9:12 32:8
<b>considered</b> 57:13	29:1,2,11 30:9	48:2,6,15 52:13	<b>deals</b> 46:11	51:12 55:18
<b>consisted</b> 68:2	30:10 31:2,19	56:17,22 57:1,4	<b>dealt</b> 51:24	69:10
<b>consultant</b> 62:20	31:22 32:22,25	57:7,10,12,15	<b>Dean</b> 9:21 10:19	<b>determine</b> 39:14
<b>contact</b> 31:24	33:15 34:15,18	57:17 58:4,10	11:8,18	74:23 77:11
42:6	34:22 36:5,8,11	59:21,23 61:11	<b>Debbie</b> 1:21 90:15	<b>determined</b> 66:9
<b>contacted</b> 42:5	38:3,8,22 43:2,8	61:13 64:14,17	<b>debriefing</b> 52:21	71:9
<b>contained</b> 87:20	43:10,11 48:21	64:19,21,23	<b>debriefings</b> 53:8	<b>develop</b> 13:24
<b>contains</b> 87:4	51:25 52:19	65:24 66:2	<b>December</b> 18:5	14:3,6
<b>contemporaneo...</b>	55:25 59:5	68:12 82:4,6,8	20:3 21:19 22:6	<b>developed</b> 57:24
53:18	60:17 61:7	82:10 89:14,16	23:8 24:19,19	59:16
<b>contend</b> 23:7 29:8	62:16 63:14,17	90:15	25:12,12,19,20	<b>developer</b> 56:6
<b>contention</b> 23:12	64:1,7,10 68:9	<b>courtesy</b> 4:6	45:9,20,20	59:9,12 79:21
<b>context</b> 12:19,22	68:16 69:13,19	<b>cover</b> 24:14	47:24 80:12	80:1 81:11
13:23	70:1,11 71:2,10	<b>created</b> 83:20	86:16	<b>device</b> 32:3,7,21
<b>continental</b> 15:15	71:12,22 73:1	<b>credit</b> 59:17,19,20	<b>declare</b> 26:17	34:18 38:12
<b>continue</b> 24:10	73:19,25 75:21	60:4,8	<b>deemed</b> 69:24	49:9,10
25:7 58:4	76:12,16 77:9	<b>criminal</b> 46:5,11	<b>Deer</b> 40:5 47:11	<b>devices</b> 19:5,9,12
<b>continued</b> 30:22	77:18 79:13,23	46:14 50:3 52:4	50:8	19:16 57:22
<b>continues</b> 15:2	83:1,9 85:20	67:2	<b>DEFENDANT</b>	77:12
<b>continuing</b> 83:8	86:24 87:4,18	<b>CROSS</b> 3:3	2:11	<b>different</b> 8:3,4
<b>Conus</b> 21:8	90:7	<b>cross-examinati...</b>	<b>defendants</b> 1:9	18:22 20:15
<b>conversation</b>	<b>correction</b> 79:10	25:4	14:24 15:2 16:4	38:4 40:12
47:17,22 49:7	<b>correctly</b> 25:21	<b>CSR</b> 1:21 90:16	<b>defense</b> 4:11 16:8	59:16 71:19
74:17 83:22	29:23 58:18	<b>currently</b> 17:25	47:2 50:4	<b>digital</b> 61:22
<b>COO</b> 15:6	65:2	41:22 62:9	<b>delay</b> 15:19	<b>direct</b> 3:3 17:1,4
<b>cooperate</b> 49:4	<b>correlate</b> 89:9	<b>custody</b> 75:20	<b>demonstrated</b> 8:8	89:5
78:21 79:1	<b>counsel</b> 4:6 11:13	<b>customers</b> 81:7	<b>Dennis</b> 59:1	<b>directions</b> 82:16
<b>copies</b> 7:13 11:21	12:12 13:2 16:1	<b>cut</b> 30:7	<b>Densmore</b> 66:18	<b>directly</b> 13:14
<b>copy</b> 20:17 22:7	17:1 21:22	<hr/>	66:19,25	17:17
27:17 29:6,7	24:10 25:3	<b>D</b>	<b>Densmore's</b> 67:10	<b>director</b> 17:25
<b>corner</b> 64:25	48:15 56:17	<b>D</b> 2:5,19 3:1	<b>department</b> 18:7	<b>DirectTV</b> 4:21 5:5
<b>CORP</b> 1:5	58:4 64:15	<b>Danny</b> 63:1,1,2,3	18:7 20:24,25	5:17 9:6 11:1
<b>corporate</b> 13:8	<b>countermeasure</b>	63:6	67:14	12:11 13:11
33:19,23 77:15	38:10,18 79:5	<b>DARIN</b> 2:13	<b>deposed</b> 34:12	41:7,16,25 42:3
<b>Corporation</b> 2:3	80:16 81:8	<b>database</b> 89:3,6	<b>deposition</b> 28:25	42:5,9,17,19
5:5	<b>country</b> 37:19	<b>date</b> 6:12 25:24	30:8 33:10 36:5	57:24 65:15
<b>correct</b> 9:25 13:4	<b>County</b> 65:7	31:25 53:23	76:9,23 77:3,7	66:5,8 69:1
14:20,21,24	<b>couple</b> 44:10 78:1	60:18 64:1	77:10,21	70:13 86:9
15:4,6 17:23	<b>course</b> 36:13	80:18 90:12	<b>depositions</b> 17:10	<b>DirectTV's</b> 65:12
18:5,6,8,11,12	<b>court</b> 1:1,21,22	<b>dates</b> 6:8 8:6 29:2	<b>describe</b> 5:25	<b>Discount</b> 75:12
18:14,18,20	4:5 6:21 14:11	<b>Dave</b> 36:24 37:2	<b>description</b> 71:14	<b>discovered</b> 8:6
19:1,6,13,17,20	14:13 15:9,12	56:15 57:2	72:2 74:4 75:6	<b>discovery</b> 85:6
19:23 20:3,4,10	15:14,18,22	<b>David</b> 1:3 2:13,24	76:9,23 77:3,7	<b>discretion</b> 86:14
20:22,23 21:1,9	16:1,5,10,17,19	36:23 63:2,3	77:10,21	<b>discuss</b> 89:16
22:11 24:21	16:21,23,25	<b>Dawson</b> 56:15	<b>descriptions</b> 17:10	<b>discussion</b> 77:20
25:11,13,20,21	21:21,25 23:2	57:2	<b>designated</b> 33:19	<b>discussions</b> 8:3
25:25 26:8,11	23:19,24 24:2,4	<b>day</b> 1:8 4:2 29:8	<b>destroy</b> 5:20,22	9:16 85:5
26:12,18 27:2,8	24:8 25:3,7	76:7 89:8	<b>destroyed</b> 6:10	<b>DISH</b> 38:9 53:6
27:12,13,24	26:11 28:6,11	<b>dealing</b> 13:15	78:3	56:5 58:22,22
			<b>detail</b> 39:5,5	

<p>58:24,25 59:1,7 59:18 60:5,9 66:12 67:8 68:25 69:3 83:12 <b>displayed</b> 20:7 22:21 63:10 64:22 81:16 87:1 <b>distributing</b> 66:8 66:12 67:7 <b>distribution</b> 56:14,24 57:16 65:13 <b>Distributors</b> 75:12 <b>District</b> 1:1,2,22 <b>DOC</b> 1:7 <b>document</b> 3:13 6:1,2 20:7 22:21 23:20,21,22 24:7 36:3 47:2 50:22 51:3,5,6,7 53:23 63:10 64:22 81:16 83:3 87:1 <b>documents</b> 5:20 5:23 6:2,3,5,6,7 6:9,22 12:24,24 23:11 41:7,16 41:25 42:4,18 86:9,19 <b>doing</b> 13:19 20:16 21:3 27:1 58:19 73:16 82:16 <b>double-dealing</b> 80:5 <b>doubt</b> 15:16 <b>Dov</b> 2:24 <b>draw</b> 8:7 <b>drives</b> 11:10,14 <b>driving</b> 76:17 <b>drove</b> 76:6,7 <b>dr7</b> 56:11,20,24 57:15,16 <b>DSS</b> 75:4,4 86:3,3 <b>dump</b> 10:7 87:4 <b>dumping</b> 45:24 <b>duties</b> 22:8 <b>D10V3</b> 1:25</p>	<p><b>E</b></p>	<p>46:16 47:20 <b>enforced</b> 6:4 <b>enforcement</b> 11:22 42:16 51:17 <b>engage</b> 38:7 <b>engaged</b> 4:22 <b>engagement</b> 13:5 <b>engineer</b> 33:8 45:24 54:15 55:8,19 65:16 74:3 80:4,11,23 81:23 82:21 <b>enter</b> 69:22,24 <b>entire</b> 25:5 <b>entitled</b> 68:15 69:10 <b>entity</b> 50:14 <b>Ereiser</b> 31:15,24 32:2,13 35:15 37:13,15,20 38:16,25 39:7 57:25 62:7 68:8 72:18 73:8 85:20,22 <b>Ereiser's</b> 31:17 <b>established</b> 13:8 <b>et</b> 1:5,8 2:3,11 8:19 <b>Eventually</b> 27:7 44:4 <b>everybody</b> 80:14 <b>evidence</b> 3:10 8:8 10:17 13:25 14:3,6 20:6 22:20 25:1,3 36:21 48:1 52:15 61:14 63:9 64:16,20 79:7 <b>exact</b> 31:25 <b>examination</b> 4:7 4:13,17 17:1,4 <b>example</b> 18:16 <b>excuse</b> 24:4 56:17 72:8 83:2 <b>exhibit</b> 3:10 7:5 10:2 20:6 21:12 22:20,24 24:1 24:16 36:2,17</p>	<p>36:21 50:21 52:8,12,15 61:3 61:9,14 63:8 64:20,24 67:16 68:11 69:9 70:10 71:18 72:9 81:14 83:2 85:12 86:17,25 <b>EXHIBITS</b> 3:9 <b>exist</b> 85:8 <b>existence</b> 23:10 34:21 <b>exists</b> 35:1 <b>expected</b> 15:19 <b>explain</b> 7:22,25 <b>explaining</b> 60:3 74:19 <b>explanation</b> 28:1 <b>explosion</b> 27:15 28:14 <b>express</b> 89:17 <b>extent</b> 9:23 <b>eyes</b> 72:3 <b>e-mail</b> 67:24,25 68:2 <b>e-mails</b> 67:17,24 <b>E020</b> 87:23,25</p>	<p><b>F</b></p>	<p><b>farmer</b> 56:5 58:22 58:22,24 59:8 59:18 60:5,9 <b>FBI</b> 48:20 65:12 66:5,25 70:4 71:2 75:20,23 83:9 84:11 <b>February</b> 30:19 80:17,19 <b>federal</b> 1:21 67:3 69:16 <b>field</b> 17:25 18:7 <b>fifth</b> 37:7 61:16 61:17 <b>fight</b> 45:25 74:19 81:22 82:20 <b>fighting</b> 81:20,25 82:14 <b>figure</b> 30:8 <b>figured</b> 74:6 <b>file</b> 6:6 52:19 <b>filed</b> 25:22,24 47:2 <b>finally</b> 12:3 <b>financial</b> 15:5 <b>financier</b> 69:1 <b>find</b> 6:25 30:4 35:23 39:18 55:5,23,24 73:5 73:12 76:7 77:4 84:13 85:3,4 87:11 89:3 <b>finding</b> 32:24 33:3 <b>finish</b> 62:24 <b>firewall</b> 13:8 <b>firm</b> 13:12 <b>firms</b> 18:22 19:3 <b>first</b> 22:2 31:23 32:19 34:21 53:25 63:12 64:3 65:19 67:2 72:10 73:23 <b>five</b> 18:25 25:25 60:15 68:12,13 <b>five-eleven</b> 71:21 <b>five-ten</b> 71:21 <b>fix</b> 30:21 <b>fixed</b> 30:19 <b>flew</b> 60:12</p>
--	-----------------	--	---	-----------------	--

<b>fly</b> 60:14	<b>generated</b> 7:1	43:1,1,4,15,23	<b>half</b> 49:22	1:3
<b>focus</b> 22:23 24:15	<b>gentleman</b> 42:17	44:3,8,15,19,21	<b>hand</b> 16:7	<b>hope</b> 15:1
<b>focused</b> 10:25	46:19	44:23 45:23	<b>handwritten</b> 70:6	<b>hosted</b> 85:19,22
68:24	<b>gentlemen</b> 24:4	47:10,12,23	71:17,21,24	<b>hours</b> 15:20
<b>focusing</b> 23:6	<b>George</b> 14:3	50:7 53:6 55:14	79:12	<b>house</b> 64:10
83:3 85:13	<b>Gerald</b> 16:19	56:6,12,12,14	<b>happen</b> 66:22	<b>Houston</b> 2:8
<b>folks</b> 17:12 35:18	<b>Gerlinsky</b> 62:5,11	56:20,23,25	82:24	<b>HTML</b> 20:15,18
35:24 50:12	62:20,21	57:12,14,16,18	<b>hard</b> 6:2 11:10,14	<b>hundred</b> 63:21
78:22	<b>getting</b> 45:13 73:5	57:19,19 58:7,8	<b>harm</b> 46:7	<b>hundreds</b> 19:19
<b>follow</b> 29:24	74:14 78:22	58:9,16,24,24	<b>HARTSON</b> 2:18	19:22
55:22 72:17	88:22,24	59:8,18 62:15	<b>head</b> 13:9 54:4	<b>hunt</b> 31:11
74:5 84:7,13	<b>give</b> 7:21 22:7	65:17 78:12,18	55:17	<b>hurt</b> 81:8
<b>foregoing</b> 90:6	55:18 71:18	78:22 79:16	<b>headed</b> 10:3	
<b>form</b> 7:12 70:10	<b>given</b> 11:21 20:21	80:2 84:20	<b>hear</b> 44:22 46:2,3	<b>I</b>
89:17	34:16 40:23	<b>groups</b> 40:12,13	46:23 47:5	<b>ICG</b> 6:13 13:2,19
<b>format</b> 20:18 90:9	51:21 59:6,19	58:1 82:1	51:14 53:8	14:19,22,23
<b>former</b> 37:2	59:20 60:9	<b>GS2</b> 9:17	54:11 60:12	15:1
<b>forth</b> 26:15	75:11	<b>guess</b> 63:21	88:6	<b>ICGP04549</b> 10:4
<b>forum</b> 28:18	<b>giving</b> 43:16	<b>Guggenheim</b> 10:3	<b>heard</b> 20:1 32:7,7	<b>ID</b> 89:3,9
<b>forums</b> 9:14	<b>go</b> 16:15 20:15	10:5,11 17:17	32:10,13 39:9	<b>identical</b> 35:16
<b>found</b> 12:1 39:17	23:2 24:13	18:11 21:3 27:5	39:11,20,22	<b>IDENTIFICAT...</b>
61:1 88:4	25:15 26:2,13	31:23 34:8,13	40:1 43:9,12	3:10
<b>Fountainview</b> 2:7	31:11 37:7	38:24 39:2,7	45:12,22 46:19	<b>identified</b> 23:9
<b>fourth</b> 23:9 24:18	42:25 48:9 49:9	63:16,24 68:9	46:22 47:1 51:9	<b>identify</b> 7:9 42:19
25:14,18,22	49:14 52:17	69:13 77:25	51:12 54:12,13	44:2 73:6
37:7 61:16	56:22 61:3 63:8	78:3 82:2 83:24	<b>hearing</b> 35:17	<b>identifying</b> 87:11
<b>frame</b> 46:3 81:9	64:12 65:9,22	89:5	<b>held</b> 89:21 90:8	<b>Igor</b> 41:22 86:20
<b>Francisco</b> 2:15	67:16 68:11	<b>Guggenheim's</b>	<b>Hell's</b> 45:5,10,12	<b>III</b> 1:8 4:2
<b>Frank</b> 23:23	69:9 70:17	20:24	45:24 46:1,6,12	<b>illegal</b> 38:7 66:12
<b>frequently</b> 56:7	71:17 72:8	<b>guy</b> 33:8 44:22	46:15 47:6	67:7
<b>front</b> 61:4 77:23	75:23 76:2 77:2	45:14 52:2	50:25 51:8,10	<b>illegally</b> 65:14
<b>Frost</b> 56:15 57:3	79:12 81:14	54:15 55:7 71:5	52:3	66:7 70:14
<b>full</b> 9:23 16:13	83:2 85:11 86:5	<b>guys</b> 51:3,6 56:16	<b>help</b> 48:10 49:10	<b>imaged</b> 12:20
23:20	86:16	<b>G-E-E</b> 16:24	60:20	<b>images</b> 12:6
<b>function</b> 38:5	<b>goes</b> 66:9		<b>helped</b> 23:17	<b>immediately</b>
<b>functioning</b> 38:11	<b>going</b> 5:16 15:9	<b>H</b>	<b>Helper</b> 33:11	42:20
<b>further</b> 4:24	20:10 24:13	<b>hack</b> 43:4 56:6,10	<b>hex</b> 89:12	<b>impact</b> 5:10,13
27:21 66:9	25:10 28:17	56:11 57:24	<b>highly</b> 41:16	<b>important</b> 13:1
84:14 89:22	48:4 56:13	58:16,18 59:8	<b>hire</b> 31:7 86:5	13:23 30:15
	58:13 66:22	69:2	<b>hired</b> 53:9	34:16 74:14
<b>G</b>	<b>gonna</b> 84:11	<b>hacker</b> 10:6 53:3	<b>HOGAN</b> 2:18	88:14
<b>Gale</b> 1:21 90:15	<b>good</b> 4:15,16	54:23 69:4	<b>honcho</b> 54:4	<b>impression</b> 84:10
<b>gathered</b> 31:2,16	14:17,18 17:6,7	<b>hacking</b> 10:6	55:17	<b>including</b> 23:10
<b>Gee</b> 16:4,5,8,15	62:11 89:15	60:16	<b>Honor</b> 4:10 14:12	<b>incorrect</b> 29:19
16:17,19,21	<b>group</b> 1:8 2:11	<b>hacks</b> 56:11	16:2 17:3 24:1	33:1 85:21
17:6 22:2,23	13:10 21:3	<b>Hagan</b> 2:5 3:5 5:4	24:11,23 25:1,6	<b>indicate</b> 8:2 9:12
61:23 65:3	28:17 35:5	5:19 7:7,17	36:16,19 52:14	<b>indicated</b> 68:3
69:15,21 72:22	37:11,24 39:14	14:12,13,16	61:9,12 64:18	<b>indicating</b> 80:3
74:1	39:19 40:7,9,17	15:8	68:13 89:15	<b>individual</b> 20:19
<b>generally</b> 18:8	40:19 42:25	<b>hair</b> 72:2,3	<b>HONORABLE</b>	<b>individuals</b> 11:11

43:16 <b>info</b> 54:3,24 68:1 <b>inform</b> 42:3 <b>informant</b> 10:14 10:19,22 31:20 38:21 40:3,11 52:22 79:15 85:5 <b>informants</b> 21:5 51:17 <b>information</b> 7:8 7:11,12 8:12,14 8:16,19 9:3,5,23 10:4,5 11:3,5,8 13:11 21:6,9 23:17 31:2,4,6 31:16 34:4 35:5 36:11 43:18 47:9,11 50:6 53:11 54:18,21 55:12,22 59:4,6 62:12,19 67:5 68:15,18 69:7 73:5,10 74:15 74:22 75:8 76:25 77:2 78:1 78:8 84:14,20 84:22 85:7,21 85:23 87:11,17 87:18 88:20,21 89:1 <b>informed</b> 26:16 66:21 <b>input</b> 59:16 <b>inside</b> 15:14 <b>integrity</b> 21:3 65:12 67:12,13 <b>interest</b> 5:5 15:5 <b>interested</b> 54:17 54:21 56:2 58:6 <b>Internet</b> 8:4,5,23 9:4 10:4 18:5 20:3,16,25 21:9 22:6 30:15 35:16,19 41:8 41:10,11 42:22 43:7 45:6,7,11 45:25 46:2,16 47:17,20,24 48:11 49:5	50:13,14 52:5 60:8,10,13 64:6 66:13 73:1 75:3 75:6 80:11,25 86:2 <b>interrogatories</b> 23:14 <b>interrogatory</b> 23:6,18 24:15 24:24 25:9,13 25:16 26:3,7 27:23 <b>interrupted</b> 11:25 <b>interview</b> 69:23 70:3,6,21 75:25 83:8,24 84:17 <b>interviewed</b> 53:19 71:2 <b>investigate</b> 17:19 76:11 <b>investigated</b> 30:12 <b>investigating</b> 18:8 26:23 30:11,12 35:11 <b>investigation</b> 4:21 4:25 5:8,10,12 5:13,16 6:8,10 7:1 10:24 12:5,9 13:22 27:6,11 30:24 31:3 32:24 33:3 34:8 34:13 35:4 43:15 48:10 49:5 63:13 65:13,16,19 66:17 69:17 85:6 86:1 <b>investigations</b> 18:1,13 22:15 22:16 30:3 66:5 <b>investigative</b> 3:14 18:22 36:7,11 44:7 61:6 85:2 <b>investigator</b> 17:16 69:15 72:21 74:1 75:16,18 <b>investigators</b> 18:14,20 31:7	86:5 <b>involve</b> 42:13 <b>involved</b> 13:10,25 14:4,6 39:23 42:7 43:6 46:13 47:5 63:1 66:16 <b>involvement</b> 13:13,18 <b>involving</b> 45:5 47:6 <b>irc.canuk.net</b> 85:16,19 <b>issue</b> 6:13 9:16 26:24 <b>issued</b> 83:17 <b>issues</b> 6:5 <b>itinerary</b> 68:2 <b>IV</b> 89:23 <hr/> <b>J</b> <b>J</b> 63:14 65:16 66:7 <b>James</b> 63:14 66:11 67:7,25 68:4 69:1 72:12 72:17 84:17 <b>Jansen</b> 50:17 52:22,24 53:9 53:11,19 54:23 55:18 59:11 60:2,9,15 <b>Jansen/Voyager</b> 53:22 <b>January</b> 17:14 22:11,12 26:22 45:20,21 67:1 88:12 <b>Jason</b> 49:25 <b>Jeffrey</b> 3:4 4:11 <b>Jerry</b> 16:8,15,20 16:21 <b>Jersey</b> 15:11 <b>Jim</b> 13:9,10 37:8 37:10,10,24 39:14,15,16,23 39:23 40:19,20 43:9,9,18 61:17 61:19 62:14,19 62:25 71:6,9,10 71:12,13,20	74:2,6,7,11 75:1 75:2,4,15 76:14 76:24 77:4,8 78:5,16 80:23 81:22 83:12 85:15 86:2 <b>Jim's</b> 74:3 75:12 <b>job</b> 19:5 <b>jobs</b> 18:3,19 <b>joined</b> 31:21 <b>joining</b> 22:13 <b>joint</b> 67:3 <b>JUDGE</b> 1:3 <b>Judicial</b> 90:10 <b>July</b> 31:24 <b>jump</b> 50:24 <b>June</b> 27:8,24 29:12 <b>jury</b> 1:15 4:4,20 5:25 7:11 13:23 15:19 16:14 48:15 <b>J.J</b> 16:4,5,16,17 61:23 78:4 <hr/> <b>K</b> <b>K</b> 57:8 <b>Kansas</b> 22:17 <b>KENNETH</b> 2:19 <b>kiddie</b> 84:12 <b>kind</b> 16:13 52:21 59:13 <b>King</b> 75:4 86:3 <b>KLEIN</b> 2:19 <b>knew</b> 31:25 39:6 51:21,22,23 54:19 55:4 59:12 72:14 73:3,14,18 74:1 74:9 77:17 78:11,18 79:7 <b>know</b> 10:9,13,18 10:21 13:5 21:11,14 22:4 28:9,10 31:25 32:15,16,17 34:20,23 36:24 37:17 40:2,8 41:18 42:5 46:11,12,14	50:10 51:4,12 51:16,19 54:19 59:11 60:2 61:1 62:23 63:25 66:17 67:9 68:20 69:7 72:11 74:5 76:6 79:9,10 80:3 82:3,19 88:10 88:23,24 89:7 89:11,13 <b>knowing</b> 56:2 <b>knowledge</b> 26:14 37:22 74:11 89:5 <b>knowledgeable</b> 74:10 <b>known</b> 39:5 <b>knows</b> 48:15 82:17 <b>Koinvision</b> 57:6,8 <b>Koole</b> 40:1,2,9,11 40:19,22,23 41:4 42:1 47:10 50:8 79:15 84:19 85:4 86:10 <b>K-O-I-N-V-I-S-...</b> 57:9,11 <hr/> <b>L</b> <b>L</b> 2:18 <b>lab</b> 58:20,21,23 59:4 60:20 <b>ladies</b> 24:4 <b>Lamb</b> 49:25 <b>large</b> 63:20 <b>law</b> 2:6,14,19 11:22 42:16 51:17 <b>lawyer</b> 8:21 23:23 49:25 50:4 84:4 <b>lawyers</b> 4:17 <b>lead</b> 27:1 <b>leading</b> 27:6 <b>learn</b> 32:8,19 39:12 43:22 53:5 55:10 59:15 81:22 82:14 87:19
--	--	--	--	---

<b>learned</b> 29:3 43:24 89:1	<b>looks</b> 72:3	<b>manager</b> 22:15 67:12	<b>Mexican-based</b> 66:13	<b>Moskowitz</b> 2:24
<b>led</b> 82:22	<b>loop</b> 38:11	<b>Manieri</b> 44:25	<b>Mexico</b> 33:12	<b>Motorola</b> 65:17
<b>Lee</b> 16:8,15,19,20 16:21	<b>Los</b> 2:21 77:22	45:2,17 47:23	38:17 39:1	66:6 67:24
<b>left</b> 84:10	<b>lose</b> 54:5	54:8,9	72:14,18	<b>move</b> 36:16 52:12 61:9
<b>legal</b> 45:4	<b>lost</b> 7:8	<b>manipulated</b> 87:17	<b>Michael</b> 50:20	<b>multiple</b> 29:15,15 39:23,25 43:12 43:13
<b>let's</b> 13:21 26:2 31:6,15 39:25	<b>lot</b> 20:1 29:14 39:5 40:12	<b>Manitoba</b> 37:3	<b>middle</b> 71:22 72:4 72:6 79:20	<b>mustache</b> 72:3,6
42:25 52:17	43:20 54:24	<b>March</b> 25:22	<b>Midwest</b> 22:17,18	<b>MYERS</b> 2:12
63:8 78:5 81:14	<b>Love</b> 9:21 10:19 11:8	48:20 64:1	<b>Mike</b> 44:22,24,25	<b>M-A-S-K-E-L-L</b> 46:21
83:2	<b>Love's</b> 11:14,18	65:21,24 66:1	45:17,23 47:23	
<b>line</b> 61:17 88:1,23 89:12	<b>L4N</b> 75:13	69:19	52:2 54:3,8,8,9	
<b>Lines</b> 24:16		<b>Maricopa</b> 65:8	54:10,12,13,14	
<b>link</b> 8:22 9:1,8,10 9:10,12,15	<b>M</b>	<b>Mark</b> 63:1,1,2,3	55:7,13 56:3	
<b>list</b> 47:3 53:20 55:1 59:25	<b>M</b> 2:5 43:17 44:16	<b>marked</b> 7:5 21:12 64:12	79:25 80:22	<b>N</b>
<b>listed</b> 56:21	44:17,18,20	47:1,5	<b>Mikes</b> 54:11	<b>N</b> 3:1
<b>litigation</b> 12:19 12:23 26:24	45:23	<b>Mark's</b> 63:7	<b>millions</b> 30:15	<b>Nagra</b> 10:6 32:3 80:25 81:3 87:7
44:9,13	<b>mail</b> 68:3	<b>Maskell</b> 46:19,21 47:1,5	<b>mind</b> 29:3	<b>NagraCard</b> 19:9 35:14
<b>little</b> 4:18 30:22 31:15 62:4	<b>main</b> 54:4	<b>material</b> 11:11 26:15	<b>minute</b> 13:21 24:13 25:10	<b>NagraStar</b> 6:13 10:11,15,19 11:2 17:13,14 18:1,9,13,23 22:13 31:17,20 32:6 33:20 34:17,23 36:14 62:9 63:17 82:2 87:13
71:19	<b>maintain</b> 36:13	<b>materials</b> 6:14,23	55:6 58:14	<b>NagraStar/Ech...</b> 10:22
<b>lived</b> 33:12	<b>maintained</b> 21:15	<b>matter</b> 13:10,14 89:17 90:8	81:15	<b>NagraVision</b> 19:9 21:4 50:19 53:1 53:16
<b>Lloyd</b> 36:23,24 37:4 63:2,3	<b>major</b> 55:17	<b>matters</b> 26:15 33:21	<b>minutes</b> 89:20	<b>name</b> 8:13 16:13 16:16,23 33:11 36:23 39:16,17 40:1 43:10,13 43:14,24 44:15 45:1,3 46:20,22 50:16 52:19 55:10 57:6 62:3 62:23 71:6,12 71:13 73:18,21 73:23 75:2 86:19
<b>Lloyd's</b> 37:2	<b>making</b> 8:3 42:21 70:23	<b>mean</b> 20:13 87:18	<b>missing</b> 7:15	<b>named</b> 41:21 44:22 45:23 46:19 49:25 50:10 52:22 71:6
<b>locate</b> 30:2 76:14	<b>Maldonado</b> 37:12	<b>meaning</b> 75:18	<b>misspoke</b> 67:22	
<b>located</b> 15:10,11 29:4,10 43:1	47:13,14,14,15	<b>meanings</b> 82:11	<b>mistaken</b> 28:24 33:6	
52:24	47:16 48:4,9	<b>means</b> 56:7	<b>mobile</b> 43:19	
<b>location</b> 88:5	49:1,4,13,16	<b>meant</b> 50:24 86:8	<b>moderators</b> 41:15	
<b>long</b> 77:1	50:4,8 51:24	<b>meet</b> 78:16	<b>modifications</b> 70:23	
<b>longer</b> 7:14 35:1 41:13 81:4	63:14 65:16	<b>meeting</b> 39:6 53:22 54:23	<b>modified</b> 65:14 70:14	
<b>long-time</b> 53:3 54:23	66:7,10,24 67:6	<b>members</b> 9:10 10:6 43:23 44:8	<b>modifying</b> 66:7 66:11 70:22	
<b>look</b> 25:15 65:4 68:21 75:10	68:1,3,19,24	<b>Menard</b> 46:9	83:13	
87:23	69:1,23 70:3,21	56:11,14 57:23	<b>moment</b> 23:19 24:5 28:6 40:25	
<b>looked</b> 29:5 33:10	71:1 72:11,13	58:12 82:1	56:17 57:7,17	
<b>looking</b> 10:2,17 20:19 52:8	72:22 73:3,8,15	<b>mention</b> 44:16 55:2 57:5	<b>money</b> 40:22,23 41:4	
61:16 63:12	73:22 74:2,5,16	<b>mentioned</b> 27:23 44:17 57:18	<b>monitor</b> 21:5	
65:2 66:4 70:18	75:1 77:12,16	58:25 62:23	<b>monitoring</b> 20:25 21:2,8	
72:21 75:9	77:20 78:11,15	73:23	<b>month</b> 80:16,21	
84:12	78:21 79:23	<b>merge</b> 5:17 11:1	<b>months</b> 10:25 48:23 49:22	
	80:10,22 81:3	<b>met</b> 17:8 31:25 38:25 85:15	64:5,6 72:25	
	81:12 82:19	<b>method</b> 35:16	78:2	
	83:9,16,23,25	<b>Mexican</b> 72:12,13	<b>morning</b> 69:18	
	84:2,4,8,9 85:15			
	<b>Maldonado's</b> 48:20 64:9			
	67:18,24 69:18			
	70:15			
	<b>man</b> 24:6			
	<b>manage</b> 18:19			

<b>names</b> 8:6,9 34:4 43:17,17,20,21 43:22 44:3,5,8 44:10,12,14 47:4 56:20,22 57:5 58:6 59:24 63:5	82:13 <b>Nipper's</b> 46:6,9 <b>NiPpEr2000</b> 24:20 25:20 27:20,25 29:16 77:12,17 87:6 <b>normal</b> 6:9 <b>normally</b> 6:4 <b>note</b> 81:1 <b>notes</b> 3:12,14 33:10 34:6 36:7 36:11 37:23 44:7 53:18 59:7 61:6 70:6,9 71:17,20,21,24 71:25 79:12,13 83:18 85:2,3,5	46:15 <b>occurring</b> 38:19 59:14 67:19 <b>offer</b> 49:22 78:21 79:1 <b>offered</b> 49:13 <b>offering</b> 48:13 49:8 79:18 <b>office</b> 65:12 69:16 <b>officer</b> 14:20,23 <b>offices</b> 22:16 53:16 <b>Official</b> 1:21 <b>Oh</b> 39:19 67:23 <b>Okay</b> 5:25 6:18 6:25 9:5 15:17 15:21 24:8 28:11 36:1 37:1 44:5 58:10 61:16 65:7,10 68:23 80:20 82:10 83:4,7 86:8,16,25 87:25	<b>original</b> 27:16 29:7 58:17 <b>originally</b> 27:22 77:19 <b>originals</b> 11:18 <b>Overruled</b> 48:2 <b>owning</b> 83:11 <b>O'MELVENEY</b> 2:12	85:5 <b>partner</b> 46:7,9 66:11 67:6 69:1 74:17,20 <b>party</b> 24:8 <b>password</b> 87:19 87:20 88:4,11 89:2,6,9 <b>passwords</b> 88:17 <b>paste</b> 27:18 29:6,7 30:7 <b>patch</b> 30:19,21,21 <b>patched</b> 79:4 <b>Paul</b> 63:14 66:11 67:7,25 68:4 69:1 <b>pay</b> 40:22 86:9,12 86:21 <b>PDF</b> 20:17 <b>people</b> 8:3,9 9:16 20:25 26:25 28:18 31:4,5 37:18 40:15 44:3 59:15,16 60:4,5 72:14 73:12 83:21 <b>period</b> 6:4,4 19:8 26:1 <b>Perlman</b> 9:17 10:22 11:3 <b>person</b> 13:12 18:4 26:22 27:1 29:19 33:11,12 39:17 41:21 42:20 50:13,14 53:13,14 54:19 57:6 59:17 67:13 71:12,13 72:18 86:19 87:13 <b>personal</b> 26:14 62:3 <b>personally</b> 5:1,2 13:16 <b>persons</b> 9:14 15:14 <b>Phoenix</b> 69:16 <b>phone</b> 53:13,25 54:4,18,25 55:10,13,17,19
<b>NDS</b> 1:8 2:11 4:8 5:19,22 11:17 11:20 13:3,14 13:16 14:6 16:3 17:2 20:2 23:7 29:3,10 42:3,6,7 42:13 79:8,11	<b>notice</b> 15:20 <b>noticed</b> 30:7 <b>notified</b> 69:22 <b>Nova</b> 39:21 <b>November</b> 4:23 4:24 7:4 9:11 65:11 78:15 <b>number</b> 53:25 54:24 70:13 74:25 75:7,14 87:16,16 89:3 89:10,11 <b>numbers</b> 23:2 87:24	<b>Om</b> 38:17 39:1 39:6 72:18 <b>once</b> 27:4 85:23 <b>ones</b> 7:2 45:8 <b>ongoing</b> 65:13 <b>Ontario</b> 35:6 37:11,24 38:18 39:4,9,22 40:13 43:2 46:5,15 49:9 51:22,24 58:21 59:5 61:19 62:15,25 71:6,10 74:7 75:13 76:3,7,18 77:2 78:16 82:21 86:2,6 <b>oOo</b> 89:24 90:1 <b>operating</b> 14:19 14:23 <b>opinion</b> 73:17 89:17 <b>opportunity</b> 7:21 <b>order</b> 6:21 38:13 58:1 <b>organizations</b> 40:12	<b>page</b> 10:3 20:16 20:17 21:20 22:23,25 23:3 24:15 63:12 64:3,12,23,24 65:9 67:16,25 68:11,21 69:9 70:10,17 71:18 71:18 72:8,8 75:10 79:12,20 83:2,3 85:11,14 90:9 <b>pages</b> 63:19,21 <b>paid</b> 10:14,19,22 14:22,23 32:3 41:9,25 62:9 69:2 81:5 <b>paragraph</b> 25:5 26:13 37:7 61:16 65:9,22 66:4 67:23 68:21 70:18 71:4 72:10,11 72:21 83:5 85:13 <b>Paragraphs</b> 23:9 24:17 <b>Pardon</b> 43:25 <b>part</b> 7:1 10:24 12:5 13:24 23:8 27:11 37:19 44:23 56:6 57:13 59:9,12 65:3 69:12 <b>partial</b> 11:21 <b>participated</b> 70:3 <b>particular</b> 8:13 13:7 20:21 21:14 66:16	<b>near</b> 22:9 51:7 88:8 <b>Nebraska</b> 22:17 <b>need</b> 15:16 38:12 42:19 55:5 65:5 <b>needed</b> 15:18 57:21 <b>Neither</b> 5:3 <b>network</b> 38:9 65:16 68:25 69:3 83:12 <b>never</b> 11:17 28:21 39:9 49:13 51:9 77:5 <b>new</b> 15:11 29:24 39:21 75:16,24 76:25 <b>News</b> 5:5 <b>Niagara</b> 40:13 <b>nice</b> 89:19 <b>nicknames</b> 75:3,6 86:2 <b>Nicolas</b> 35:14 <b>Nipper</b> 9:13 18:4 21:19,20 27:17 27:18,19 28:20 28:22 29:6,15 29:16,17 30:4 31:3,5 45:16 46:4 47:4 51:7 55:3 72:22 73:3 73:11,19,21,22 73:23 74:2,6,12 74:13,17,20,23 77:4 78:1,6
	<hr/> <b>O</b> <hr/> <b>O</b> 1:3 <b>oath</b> 24:14 25:10 26:7,10,17 33:25 40:24 49:13 76:13 85:23 <b>object</b> 12:9 24:23 <b>objection</b> 36:18 36:19 47:25 52:13,14 61:11 61:12 64:14,18 <b>obligation</b> 33:24 <b>obtained</b> 21:11 37:16,20 38:17 44:12 54:3 68:8 <b>obtaining</b> 74:15 <b>occurred</b> 45:19			

55:19,23,24 74:25 75:7,14 <b>phonetic</b> 50:1 63:6 <b>photocopies</b> 42:21 <b>photograph</b> 20:20 <b>physical</b> 6:6,19 71:14,19 72:2 74:4 <b>picked</b> 30:25 <b>picture</b> 20:19 <b>Pinkerton</b> 18:17 22:15 <b>piracy</b> 9:10 14:1,4 14:7 17:20 18:8 18:13 21:5,9 27:15 28:14 30:16,22 32:3 37:5 38:7,15 39:24 43:15 53:6 55:14 59:4 63:4 68:24 74:14 78:18 84:11,15 <b>piracy-related</b> 21:1 <b>pirate</b> 19:5,9 35:5 37:2,2 51:18 53:3 87:5 <b>pirates</b> 38:12 43:1 51:17 78:23 <b>pissed</b> 80:7,10,15 80:22 81:2,3,4,7 <b>place</b> 15:9 40:16 <b>placed</b> 77:23 <b>PLAINTIFF</b> 2:3 <b>plaintiffs</b> 1:6 11:13 13:2 26:16 87:7 <b>player</b> 37:4 <b>PLC</b> 1:8 2:11 <b>please</b> 16:1,5,7,11 20:6 21:23 22:19 25:7 36:2 52:8 61:3 63:8 65:9 68:11 69:9 70:17 79:12 83:3 85:11 86:17	<b>Plex</b> 53:6 58:25 59:1 <b>plus</b> 51:20 <b>point</b> 5:4 6:9 13:1 20:21 27:11 28:2 31:11 34:23 53:25 56:5 67:11,14 79:7 87:8 88:15 <b>pointed</b> 13:2 <b>policies</b> 6:1 <b>policy</b> 6:2 <b>porn</b> 84:12 <b>pornography</b> 11:25 <b>portion</b> 21:21 88:18 <b>position</b> 32:6 <b>possession</b> 65:14 <b>possible</b> 19:2,24 36:10 39:13 51:20 60:25 75:9 84:23 88:6 <b>Possibly</b> 88:7 <b>post</b> 21:18,20 27:17,18,19 28:20,22 46:4 74:13 86:16 87:4,14 <b>postal</b> 69:17 75:13 <b>posted</b> 8:14 20:21 27:22 41:7,15 80:11,24 82:13 87:8 <b>poster</b> 29:7 <b>posting</b> 8:18 9:19 27:14,16,17,18 27:20 28:13,17 28:23 29:16,18 29:24 30:7 42:21 45:11,16 82:22 87:14 89:3 <b>postings</b> 8:3,5,10 8:11,17 9:17,21 18:5 20:3 21:1 22:6 23:9 25:11 25:19,25 26:1 26:23 28:19	30:5,15 35:16 35:19,24 43:6 45:6,7,9 46:7 47:6,17 48:11 48:23 49:5,23 51:23 52:5 64:6 72:25 73:9 77:13 78:2,2 79:3 81:24 88:15 <b>posts</b> 7:13,15 21:20 24:18 <b>practice</b> 6:9 <b>premises</b> 69:22 <b>prepare</b> 63:24 <b>prepared</b> 25:15 33:17 63:16 <b>presence</b> 4:4 70:4 83:9 <b>present</b> 2:23 7:2 <b>presented</b> 51:6 76:23 <b>president</b> 14:19 15:6 <b>PRESIDING</b> 1:3 <b>pretty</b> 37:4 <b>PREVIOUSLY</b> 4:11 <b>primary</b> 18:10 65:15 <b>Princeton</b> 15:11 <b>printouts</b> 7:13 <b>prior</b> 51:3 <b>prison</b> 41:22 <b>private</b> 18:14,20 18:22 28:17 31:7 86:5 <b>probably</b> 19:19 19:22 22:12 23:17 35:25,25 50:9 62:23 68:20 71:24 80:15 88:8 <b>procedure</b> 38:25 <b>proceedings</b> 1:14 45:4 89:22 90:8 <b>produced</b> 9:15 <b>program</b> 38:4 56:14,19 <b>programmer</b>	45:13,13 <b>programming</b> 57:20 65:13 <b>projects</b> 17:16 <b>properly</b> 38:12 <b>prosecution</b> 42:17 46:15,18,24 47:6,8 50:25 51:2,9,11 <b>prosper</b> 82:15 <b>provide</b> 11:2,5,8 11:10 21:6 45:15 <b>provided</b> 9:6 10:5 36:3 37:11 50:22 51:3 53:24 68:8,18 <b>providing</b> 42:21 74:12 <b>province</b> 37:3 <b>provinces</b> 39:21 <b>proxy</b> 12:12 <b>pseudonym</b> 9:13 43:10 <b>public</b> 28:18,22 <b>publicly</b> 41:13,14 86:20,23 <b>publish</b> 64:21 <b>publishing</b> 60:16 <b>pull</b> 78:4,8 <b>purchase</b> 69:2 <b>purchased</b> 5:5 32:8 69:4 71:5 <b>purported</b> 9:10 <b>pursuant</b> 90:5 <b>put</b> 39:16 83:18 <b>putting</b> 15:15 <b>p.m</b> 4:3 89:21 <b>P4</b> 41:17 42:8,9	<b>Quinn</b> 56:15 57:2 57:7 <b>quite</b> 38:21 <b>quote</b> 37:12,12 <hr/> <b>R</b> <hr/> <b>R</b> 2:13 <b>raid</b> 48:20 49:1 64:9 66:19,21 66:25 67:19 68:1,19 69:17 70:14 73:7 83:25 84:2,5,8 <b>raise</b> 16:7 <b>raises</b> 13:1 <b>RCMP</b> 46:10 51:17 <b>reached</b> 10:1 <b>read</b> 24:25 25:4 <b>reading</b> 70:23 <b>real</b> 29:4,10 30:2 43:22 44:3,8 <b>really</b> 30:14,18 78:6 79:3 <b>reason</b> 13:6 49:21 77:8,9 78:25 79:3,7 <b>recall</b> 5:6,20 7:19 8:23 10:7 11:15 12:7 15:25 18:24 23:14 25:21,23,24 33:7,9,13 34:5,9 34:12,13 35:9 35:17 37:16 38:19 40:8,18 41:4 44:14 45:4 48:12,13 49:7,8 49:17,19,20,25 50:9 51:1,2 55:12 58:18 60:24 63:7 65:4 66:23 67:10,19 70:13 74:18,19 76:10,14,17 77:1,16,20,23 78:24 79:15,18 80:6,18 81:12 82:3,23,25 83:16,18,22
<hr/> <b>Q</b> <hr/>				
<b>question</b> 48:3,6 51:14 58:17 60:2 78:13 <b>questions</b> 7:17 11:14,15 12:3 14:10 52:9,18 52:23 53:20 56:8 60:15 77:21				

87:10,12 88:19 <b>recalled</b> 77:2 <b>receding</b> 72:3 <b>receive</b> 15:20 <b>received</b> 22:9 31:4 36:20,21 43:20 52:15 54:18 55:12 61:13,14 64:14 64:19,20 83:12 <b>receiver</b> 87:16 89:11 <b>receivers</b> 70:13 70:22 72:13 <b>recess</b> 89:19,21 <b>recognize</b> 36:5 52:9 86:25 <b>recollection</b> 48:19 62:18 76:21 <b>record</b> 24:25 <b>recorded</b> 8:18,18 53:8 <b>recording</b> 49:8 <b>records</b> 6:19,20 <b>recovered</b> 7:3 <b>Recross</b> 3:3 14:11 <b>RECROSS-EX...</b> 14:15 <b>Red</b> 40:5 47:10 50:8 <b>redirect</b> 3:3 4:7 4:13 <b>redouble</b> 35:22 <b>refer</b> 38:2 <b>reference</b> 24:18 25:18 27:25 63:13 <b>referenced</b> 7:14 28:19,21 51:8 51:19 58:20 <b>references</b> 25:14 <b>referred</b> 8:22 54:9 <b>referring</b> 9:8 51:5 80:15 <b>refers</b> 43:1 80:2 <b>reflect</b> 37:23 <b>refresh</b> 48:19 62:18 <b>refreshed</b> 76:20	<b>regarding</b> 41:17 <b>Reggie</b> 9:19 10:14 11:6 <b>region</b> 22:17 <b>regulations</b> 90:10 <b>relate</b> 85:3 <b>related</b> 6:10 <b>relationship</b> 31:17 <b>released</b> 57:23 <b>relevant</b> 23:11 <b>relying</b> 9:24 <b>remainder</b> 24:24 <b>remember</b> 44:6 44:15 63:5 <b>remind</b> 4:20 <b>removing</b> 70:22 <b>Renaud</b> 59:1 <b>repaired</b> 39:10 <b>report</b> 7:4,9,14 8:2,13,16 9:11 10:2 13:15 17:17 63:13,19 63:20,20,22 64:9 69:12 77:12,23,25 78:14 <b>reported</b> 89:22 90:7 <b>Reporter</b> 1:21 90:15 <b>REPORTER'S</b> 1:14 <b>reporting</b> 9:15 19:16 <b>reports</b> 6:25 7:2 7:19,25 19:15 63:23 <b>representative</b> 33:20,24 77:16 <b>representatives</b> 26:16 65:11 <b>representing</b> 8:16 50:4 <b>reprogram</b> 32:21 <b>reprogramming</b> 34:18 <b>request</b> 24:23 <b>resets</b> 38:5 <b>residence</b> 48:20	69:18 70:15 <b>resides</b> 40:5 <b>respectively</b> 24:20 <b>responded</b> 73:22 <b>responding</b> 23:14 23:15 <b>response</b> 24:15 25:9 27:24 <b>responses</b> 25:16 26:3,7,15,17 52:10 <b>responsibilities</b> 17:19 19:6 <b>responsibility</b> 18:8,11 22:5 <b>responsible</b> 20:2 23:7 24:8 26:23 27:1 42:20 <b>responsive</b> 12:24 <b>restated</b> 39:19 <b>result</b> 49:1 <b>resulted</b> 28:13,17 81:23 <b>results</b> 66:4 <b>RESUMED</b> 4:12 <b>retain</b> 6:13 <b>retained</b> 13:3 <b>retains</b> 18:14 <b>retention</b> 6:1,2 <b>revealed</b> 66:6 <b>review</b> 11:24 34:6 <b>reviewed</b> 12:23 19:19,22 <b>revolved</b> 45:5 <b>Richard</b> 2:18 16:3 <b>right</b> 7:11 9:24 15:9 16:7 18:1 19:10 21:25 22:2 23:15 24:6 24:9,14 26:20 26:24 27:15 30:6 31:18 32:14 34:21,24 35:2 41:13,17 41:23 42:25 43:7 44:15,25 45:17 46:14,17 48:24 50:9 52:8 54:25 55:8 56:3	56:8 57:1,17 58:4 61:1,22 64:19 65:17 68:7 69:24 71:14 73:24 76:11,15 77:13 77:20 78:12,19 80:17,21 82:25 85:11 88:12,18 <b>right-hand</b> 64:25 <b>ring</b> 39:4 <b>role</b> 13:13,14 14:19 23:15 34:16 <b>ROM</b> 10:7 43:4,6 56:6,10,11 58:16,18 59:8 87:21 88:5,18 <b>Ron</b> 37:13 39:7 85:20 <b>Room</b> 1:22 <b>roughly</b> 6:3 25:23 80:21 <b>RPR</b> 1:21 90:16 <b>Rubin</b> 2:24 <b>Rule</b> 24:25 <b>rumored</b> 60:22 <b>rumoring</b> 37:18 <b>rumors</b> 35:7,8,9 35:10 59:1,3 <b>run</b> 89:6 <b>Russ</b> 66:18,19	49:13,18,18,20 60:7 82:24,25 <b>says</b> 24:17 52:18 54:14 55:17 56:5 59:7,7 61:25 62:14,25 63:13 65:7,11 66:4 68:1,24 69:15,21 70:21 71:4,21 72:11 72:21 75:15,20 79:20 80:7 81:18 83:11 85:14 <b>scene</b> 84:10 <b>scheduled</b> 68:4 <b>scope</b> 13:5 <b>Scotia</b> 39:21 <b>screen</b> 8:5,9,13 20:11,12,13 21:6,11,14 22:3 22:7 <b>Scullion</b> 9:19 10:14 11:6 <b>search</b> 65:3,7,22 67:20 69:23 86:6 <b>searched</b> 6:19 <b>seat</b> 27:5 <b>seated</b> 4:7 16:11 <b>second</b> 60:7 70:18 71:18 72:10 85:14 <b>Section</b> 90:5 <b>security</b> 17:25 18:7 <b>see</b> 6:16 23:12,19 24:2 26:2 37:8 37:13 48:19 52:5 54:1,6 59:9 61:20,23 66:14 68:5 69:4 70:24 71:7,15 72:15 72:23 74:5 78:5 79:21 80:7 81:18 83:13 85:17 89:19 <b>seen</b> 6:22 20:9 <b>Seffens</b> 89:23 <b>seized</b> 11:22
--	---	---	---	--

70:14	<b>sir</b> 15:9 16:6,10	<b>special</b> 17:16	24:12 25:1,8	<b>Swiss</b> 59:18
<b>sell</b> 79:18	16:12,18,22,23	69:15	28:12 36:1,4,16	<b>Switzerland</b> 19:9
<b>selling</b> 42:22	20:10 23:6,21	<b>specifically</b> 82:20	36:22 41:3 48:5	19:16 21:4,8
72:13	24:7 25:9 28:3	<b>specified</b> 28:22	48:8,17,18	35:18,24 39:2,3
<b>send</b> 19:8 38:9	28:21 30:16	<b>specify</b> 10:5 25:11	50:20,23 52:12	39:8 51:23
<b>senior</b> 67:13	31:2 33:17 35:8	<b>spell</b> 16:23 57:10	52:16 58:13,15	52:25 53:17
<b>sensitive</b> 41:16	35:12,13 38:3	<b>spoke</b> 53:12,14	58:25 60:1,3	60:12,14
<b>sent</b> 38:17 39:7,9	39:12 40:3,7,24	63:3	61:9,15 63:11	<b>SWORN</b> 4:11
83:12	41:4,23 42:18	<b>spread</b> 27:21	64:16,24 65:1	16:8
<b>sentence</b> 70:24	44:11 45:18,22	<b>St</b> 63:14 66:11	66:3 68:13,14	<b>system</b> 65:15
71:15 74:9	46:8 48:5 51:5	67:7,25 68:4	81:17 82:18	66:13 67:8
85:14	52:8 55:6 58:13	69:1 72:12,17	87:3 89:15	68:25 78:3 80:7
<b>sentences</b> 69:21	60:7 61:3,4	84:17	<b>stop</b> 78:4	80:13,15 81:2,4
<b>separately</b> 24:1	65:25 66:1	<b>Stack</b> 85:22	<b>stopped</b> 30:22,24	85:4
<b>September</b> 4:22	67:21 68:22	<b>Stan</b> 56:15 57:2	<b>stops</b> 78:4,9	
66:10 67:6 68:5	76:5 79:13 80:2	<b>STAND</b> 4:12	<b>storage</b> 6:5	<b>T</b>
68:7 78:15	82:19 84:22	<b>Stars</b> 2:20	<b>story</b> 45:11	<b>T</b> 2:4 23:23 43:17
<b>Serebryany</b> 41:22	85:1	<b>started</b> 18:3 22:9	<b>stream</b> 59:15	<b>take</b> 20:13 36:10
<b>serious</b> 79:4	<b>sit</b> 32:17 82:25	47:3 67:1 76:22	<b>Street</b> 1:22	58:2 74:4 78:8
<b>server</b> 6:6	<b>six</b> 18:25 30:6,10	88:12,16	<b>strike</b> 4:8	80:13 86:25
<b>Service</b> 69:17	<b>slowly</b> 56:23	<b>starting</b> 10:3 32:5	<b>string</b> 87:23	89:6
<b>servicing</b> 41:22	<b>Smart</b> 38:10,11	<b>starts</b> 23:3 38:5	<b>strongly</b> 7:18	<b>taken</b> 10:16 28:25
<b>session</b> 4:5	56:13,19 87:15	<b>state</b> 16:13 23:10	<b>stuff</b> 41:9,11	41:12 49:21
<b>set</b> 26:15 35:10	89:11,12	27:19 37:25	42:21	67:17 76:10
<b>seven-points</b>	<b>snapshot</b> 20:20	65:8 81:9	<b>StuntGuy</b> 59:13	79:1
54:22	<b>snow</b> 43:19	<b>stated</b> 9:14 55:21	59:17 60:4,16	<b>talk</b> 31:6,15 39:25
<b>Sharon</b> 89:22	<b>Snyder</b> 2:13 3:4	85:21 88:11	60:23,25 61:1	60:14
<b>Shawn</b> 56:15 57:2	4:7,10,14 14:9	<b>statement</b> 37:5	<b>StuntGuy's</b> 56:7	<b>talked</b> 47:10 82:2
<b>shot</b> 20:11,12,13	<b>software</b> 38:13	85:9	59:9,12	<b>talking</b> 51:19
21:11,14 22:3,7	<b>sold</b> 45:23	<b>states</b> 1:1,22	<b>StuntGuy-publi...</b>	58:22
<b>shots</b> 21:6	<b>somebody</b> 22:6	15:15 21:18	60:8	<b>tape</b> 49:8
<b>show</b> 20:5 22:19	40:17 43:14	22:18 24:17	<b>subject</b> 15:25	<b>target</b> 65:15
36:1 50:20	45:22 50:10	26:14 67:23	<b>subpoena</b> 6:13,16	<b>Tarnovsky</b> 8:22
52:17	51:24 62:7	69:17 90:6,10	<b>subpoenaed</b> 13:7	9:1,13 12:10
<b>showing</b> 79:16	88:17	<b>stating</b> 26:7 37:25	<b>suggest</b> 73:21	13:25 14:3
<b>side</b> 72:7	<b>soon</b> 32:5	<b>steal</b> 58:2 86:19	<b>Suite</b> 2:7,15,20	24:19 27:22
<b>sides</b> 58:5	<b>sorry</b> 44:11 78:13	<b>stealing</b> 81:11	<b>summary</b> 8:20	29:8,13,14,20
<b>sign</b> 23:21	<b>sort</b> 13:1 27:5	<b>stenographically</b>	<b>supervise</b> 18:19	31:3,13 55:4
<b>signal</b> 21:2 65:12	<b>sound</b> 18:25 29:2	90:7	<b>supplied</b> 32:2	57:23 60:23
67:12,13	<b>source</b> 26:23	<b>step</b> 15:23	<b>supplier</b> 78:16	73:11 79:11
<b>signature</b> 24:14	48:10 49:5	<b>steps</b> 15:25 76:10	79:25 82:21	<b>Tarnovsky's</b> 12:4
25:10 26:4,14	50:15 62:11	<b>stole</b> 41:21 42:17	<b>supplier's</b> 82:21	12:6,19
61:23	<b>sources</b> 9:4 39:25	79:20 80:1	<b>support</b> 23:11	<b>tasked</b> 23:15
<b>signed</b> 23:22 24:6	43:12 50:6	<b>stolen</b> 41:19,25	65:3	26:25
24:7 26:2,20	62:19	42:4 86:9	<b>supporting</b> 8:8	<b>TDI</b> 12:12
27:8	<b>so-called</b> 18:4	<b>Stone</b> 2:18 3:6	<b>supposed</b> 45:14	<b>technical</b> 33:8
<b>signing</b> 26:6	32:13	16:2,3 17:1,3,5	<b>supposedly</b> 78:3	40:11 50:13,13
<b>similar</b> 57:24	<b>space</b> 6:6 72:6	20:5,8 21:23	<b>sure</b> 64:17 74:3	54:15 55:7
<b>simply</b> 60:9 71:25	<b>speak</b> 33:20 84:2	22:1,19,22 23:4	<b>surprised</b> 40:17	<b>Technician</b> 21:24
85:24	84:4	23:5,25 24:3,11	<b>surprising</b> 12:16	<b>Technologies</b>

66:6 <b>technology</b> 41:17 41:18 42:7,10 42:13 58:2,11 <b>telephone</b> 47:16 <b>tell</b> 11:17,20,24 12:18,22 17:12 38:24 40:19 47:16,19,22 49:16 50:12 56:23 74:16 76:24 78:8 79:25 80:4,10 80:22 82:20 83:20 88:3 89:1 <b>telling</b> 60:9 82:23 83:16,19 <b>tells</b> 88:17 <b>Tempe</b> 65:17 <b>term</b> 41:22 <b>test</b> 73:15 <b>testified</b> 5:15 27:14 28:16 36:7 38:16 50:7 77:19 <b>testify</b> 28:5,13 29:23 33:2,4,7 37:20 44:2 48:4 77:15 <b>testifying</b> 33:25 34:6 37:16 87:10,12 <b>testimony</b> 15:1 28:21 33:14,15 33:17 34:10,20 38:20 49:15,16 85:21,24 <b>Texas</b> 2:8 <b>text</b> 52:17 <b>thank</b> 4:6,10 14:9 15:8,22,24 16:2 16:6,10,12,25 17:3 21:25 23:6 23:24 24:11 25:6 57:4 65:6 66:2 <b>thanking</b> 60:4 <b>theories</b> 47:3 <b>theory</b> 74:12 <b>thing</b> 54:24	<b>things</b> 8:11 <b>think</b> 4:17 13:22 37:3 45:20 48:15 49:21 78:25 <b>thinking</b> 76:22 <b>third</b> 70:24 83:5 88:1 <b>Thomas</b> 63:14 <b>thought</b> 31:13 35:18 60:3,25 62:24 74:12 76:24,25 77:22 80:4 88:21 <b>thousands</b> 30:12 34:3,4 <b>thread</b> 82:4,6 <b>threat</b> 82:3,5,7,8 82:9 <b>threatened</b> 46:6 46:16 52:3 <b>three</b> 17:10 18:24 44:3 64:6 72:25 <b>three-year</b> 6:3,4 <b>Thunder</b> 58:21 59:4 60:20 <b>tie</b> 79:10 <b>ties</b> 78:18 <b>Tim</b> 23:23 <b>time</b> 8:14 10:11 10:14 17:15,24 20:21 22:2,9 26:1 27:12 28:2 30:13 31:8,9,12 33:9 34:24 36:16 44:6 46:3 49:17 52:12 61:10 67:11 68:7 74:25 76:24 77:1,10 79:9 81:9 87:8 88:6,15 89:14 89:15 <b>times</b> 8:6 43:13 <b>title</b> 17:15,22 67:10,12 90:6 <b>today</b> 6:22 7:2 12:21,25 26:11 32:17 45:8 <b>Todd</b> 43:18,24	44:1,15 <b>told</b> 34:13 35:18 35:22 46:24 52:1 73:7 79:23 88:9,19,19,21 89:8 <b>Tony</b> 68:1 <b>tools</b> 20:15 <b>top</b> 36:23 52:17 52:18 55:1 61:17 62:14 63:12 75:10 <b>Toronto</b> 68:2 76:6 <b>trace</b> 29:17 87:13 <b>track</b> 18:4 31:7 74:23 78:5 <b>tracked</b> 77:4,8 <b>training</b> 67:4 <b>transcript</b> 1:14 90:7,9 <b>transcripts</b> 52:4 <b>trial</b> 1:15 15:19 20:9 38:16 46:5 47:3 51:8 52:4 <b>tried</b> 33:18 55:23 <b>trip</b> 68:2,4 <b>trouble</b> 80:1 <b>true</b> 26:17 30:16 30:17,18 40:10 74:6 90:6 <b>truthful</b> 26:8 <b>truthfulness</b> 73:15 <b>try</b> 31:11 36:10 75:23 76:7 84:19 <b>trying</b> 30:3 55:23 55:24 73:5 <b>TSOP</b> 70:23 <b>turn</b> 13:21 <b>turned</b> 12:24 85:6 <b>two</b> 18:24 20:3 23:2 44:2 49:22 54:11 66:23 69:21 82:11 83:11 88:14 <b>two-and-a-half</b> 10:25 48:23 64:5 <b>type</b> 38:4	<b>typed</b> 70:9 <b>typewritten</b> 70:10 71:20,25 <b>typically</b> 19:15 <b>typo</b> 71:25 <hr/> <b>U</b> <hr/> <b>ultimately</b> 6:16 <b>Um</b> 39:11 54:18 <b>unable</b> 75:16 <b>uncertainty</b> 4:18 <b>underlying</b> 7:7,12 <b>underneath</b> 75:15 <b>understand</b> 19:25 20:1 27:4 34:17 42:7 44:11 65:2 67:18 <b>understanding</b> 42:9,14,15 59:14 <b>understood</b> 26:6 26:10,20,24 33:23 <b>unhappy</b> 46:1 <b>unidentified</b> 69:4 <b>unique</b> 88:4,17 <b>United</b> 1:1,22 15:15 69:17 90:6,10 <b>unknown</b> 71:6 75:2 <b>unlooper</b> 37:12 38:2,4,9,13,14 <b>upset</b> 45:12 47:19 <b>use</b> 38:12 89:9 <b>useless</b> 80:24 <b>U.S</b> 90:15 <hr/> <b>V</b> <hr/> <b>vaguely</b> 50:25 <b>validating</b> 8:20 <b>various</b> 8:3,17 19:16 <b>verbiage</b> 29:5 <b>verification</b> 23:25 <b>verify</b> 35:10 <b>version</b> 43:6 <b>versus</b> 27:21 <b>Vilcavik</b> 63:6 <b>virgin</b> 70:23	<b>Vision</b> 57:7 <b>visit</b> 76:2 <b>visited</b> 78:11 <b>Volume</b> 1:8 4:2 89:23 <b>Von</b> 29:15 <b>VonRat</b> 29:15 <b>Voyager</b> 50:10,12 50:13 52:9,18 52:22 54:23 55:18,21 <b>vs</b> 1:7 <hr/> <b>W</b> <hr/> <b>W</b> 2:13 <b>Wade</b> 2:4,6 23:23 <b>Wait</b> 60:7 <b>want</b> 7:21 15:19 21:19,21 23:19 24:14 56:22 <b>wanted</b> 7:24 54:18 56:19 59:15 <b>warrant</b> 65:4,7,22 67:20 <b>wasn't</b> 28:2 30:14 30:18 45:17,17 46:5 49:2,6 63:20 <b>Waters</b> 37:8,10 37:24 39:15,16 39:23 40:20 43:9,18 61:17 61:19 62:14,19 62:25 71:10,12 71:13 74:7,23 75:1,4 76:11,14 76:25 77:4,8 78:5 80:23 86:2 86:6 <b>way</b> 31:6 38:2 60:12,14 84:7 84:13 88:22,24 <b>wear</b> 48:9 49:8,14 <b>website</b> 8:14 20:12,14,16,21 41:15 51:18,18 66:13 <b>websites</b> 21:6 27:21 85:15
--	--	--	---	---

<p><b>Wednesday</b> 1:17 4:1 <b>week</b> 66:23 83:11 <b>weeks</b> 66:23 <b>Welch</b> 2:4,6 23:23 <b>went</b> 7:4 38:25 39:2,3,3 48:20 55:10 56:19 57:6 59:17 76:22 80:7,15 81:2,4 <b>weren't</b> 23:15 33:19 35:8 79:3 86:23 <b>West</b> 1:22 2:14 46:10 56:12 57:12,14 81:25 <b>we'll</b> 15:16 24:13 55:6 89:19 <b>we're</b> 4:5 7:15 10:24 15:9,15 23:6 25:9 45:8 48:24 52:6 58:13 65:2 <b>we've</b> 6:22 17:8 20:9 44:9,13 47:10 61:1 63:3 <b>whatsoever</b> 13:18 <b>WILLETTS</b> 2:5 24:23 25:6 36:19 47:25 52:14 61:12 64:18 <b>William</b> 50:17 52:22 <b>willing</b> 49:4 <b>wiped</b> 83:17 <b>wire</b> 48:9,16 49:9 49:14 <b>withdraw</b> 10:10 <b>witness</b> 4:11 15:13,17,21,24 15:25 16:1,8,9 16:11,15,18,20 16:22,24 20:5 22:20 23:4,22 24:7 28:10 36:1 36:3 41:2 48:7 50:21,22 56:18 56:24 57:2,5,8</p>	<p>57:11,13,16,19 58:8,11 59:22 59:24 66:1 82:5 82:7,9,11 87:2 <b>WITNESSES</b> 3:3 <b>words</b> 27:4 28:7 <b>work</b> 4:24 13:16 13:18,24 15:2 21:3 36:13 38:13 50:18 58:20 67:21 <b>worked</b> 58:22,23 58:24 59:1 81:5 <b>working</b> 13:10,12 13:13 17:12,14 22:10,13 57:25 <b>Works</b> 82:15 <b>world</b> 82:15 <b>wouldn't</b> 12:16 49:21 79:1 80:13 81:3,5 <b>write</b> 75:17,24 84:24 <b>wrong</b> 33:5 85:24 85:25 <b>wrongly</b> 29:20 <b>wrote</b> 37:10 59:17 61:19 62:24 69:12 81:1 <b>www.canuk.com</b> 85:16 <b>WWW.hightec...</b> 85:16</p> <hr/> <p style="text-align: center;"><b>X</b></p> <p><b>X</b> 3:1 <b>xbr21</b> 21:18 24:20 25:19 27:14,16 27:17,20 28:13 28:16,23 29:4,7 29:8,10,13,16 29:18,21,24 30:2,4 31:7,11 31:13</p> <hr/> <p style="text-align: center;"><b>Y</b></p> <p><b>Yeah</b> 23:1 46:5 <b>year</b> 46:3 76:6 <b>years</b> 19:20 25:25 30:6,10 44:10</p>	<p>44:13 <b>Yonge</b> 75:13 76:2 <b>York</b> 75:16,24 <b>young</b> 61:25 62:2 62:3,22</p> <hr/> <p style="text-align: center;"><b>Z</b></p> <p><b>zapped</b> 80:25 <b>zip22</b> 59:19</p> <hr/> <p style="text-align: center;"><b>\$</b></p> <p><b>\$25,000</b> 71:5 <b>\$5,000</b> 41:25 86:9 86:13,21 <b>\$60,000</b> 32:3 <b>\$80,000</b> 69:2</p> <hr/> <p style="text-align: center;"><b>0</b></p> <p><b>004</b> 23:3 <b>03-950</b> 1:7</p> <hr/> <p style="text-align: center;"><b>1</b></p> <p><b>1-053</b> 1:22 <b>1:03</b> 4:3 <b>10</b> 1:8 4:2 10:7 67:23 71:18 <b>106</b> 24:25 <b>108</b> 64:24 65:9 <b>109</b> 67:16,25 <b>11</b> 79:12 <b>11th</b> 53:23 <b>120</b> 63:19 <b>129</b> 23:9 24:17 <b>1296</b> 22:20,24 24:16 <b>1296-4</b> 23:1 <b>1297</b> 24:1,2,13 26:2 <b>131</b> 23:9 24:17 <b>14</b> 3:5 <b>14th</b> 7:4 9:11 <b>1400</b> 2:20 <b>16</b> 88:3 <b>17</b> 3:6 <b>191</b> 86:17,25 <b>1999</b> 2:20 60:17</p> <hr/> <p style="text-align: center;"><b>2</b></p> <p><b>2:55</b> 89:21 <b>20</b> 24:16 89:12,20 <b>2000</b> 18:5 19:8,23</p>	<p>20:3,24 21:19 22:6 23:8 24:19 24:19 25:12 31:24 32:1 45:9 47:24 65:11 66:10 67:6 68:5 68:7 78:12,15 80:12 <b>2001</b> 17:14 18:3 18:23 22:11,12 22:14 26:22 30:20 32:20 45:20 48:21 51:10 64:1 65:24 66:1,2 67:1 69:19 80:17,19 88:12 <b>2002</b> 4:22,23,24 10:25 13:11,15 19:8,23 45:21 51:10 <b>2003</b> 53:23 54:17 55:15,25 <b>2005</b> 6:11 25:23 <b>2006</b> 6:11 17:22 <b>2007</b> 27:8,24 28:25 29:1,1,12 30:8 33:15 76:10,13 <b>2008</b> 1:17 4:1 90:12 <b>2008-04-24</b> 1:25 <b>21st</b> 80:17,19 <b>22nd</b> 69:19 <b>23</b> 24:16 <b>23rd</b> 21:19 23:8 24:19 25:12,19 64:1 <b>24</b> 1:17 4:1 <b>24th</b> 23:8 24:19 25:12,20 86:16 <b>2401</b> 2:7 <b>25</b> 90:12 <b>25,000</b> 81:5 <b>2600</b> 2:15 <b>275</b> 2:14 <b>28</b> 90:6 <b>29</b> 7:5 10:2</p> <hr/> <p style="text-align: center;"><b>3</b></p>	<p><b>3</b> 43:4,6 56:5,6,10 56:11 58:16,18 59:8 69:9 87:21 88:5,18 <b>30</b> 72:2 <b>30th</b> 28:25 76:9 <b>310</b> 2:21 <b>32</b> 23:7 24:15,24 <b>336</b> 75:13 76:2 <b>345</b> 75:13 <b>35</b> 72:2 <b>36</b> 3:12 <b>374</b> 3:11 63:8 64:20 67:16 83:2 85:12 <b>374-108</b> 64:12 <b>375</b> 3:12 36:2,5,17 36:21 <b>377</b> 3:13 50:21,24 52:8,12,15 <b>378</b> 3:14 61:3,4,9 61:14</p> <hr/> <p style="text-align: center;"><b>4</b></p> <p><b>4</b> 3:4 22:23,25 24:15 70:10,17 76:2 85:11,14 <b>4C8</b> 75:13 <b>4th</b> 1:22 <b>411</b> 1:22 <b>415</b> 2:16 <b>48</b> 15:20 <b>48-hour</b> 15:15</p> <hr/> <p style="text-align: center;"><b>5</b></p> <p><b>5</b> 23:3 72:8 75:10 83:3 <b>5,000</b> 41:9,11 <b>5-foot-4</b> 71:20 <b>511-A</b> 20:6,9 21:12 81:14 <b>52</b> 3:13 <b>54</b> 87:24 <b>558-8141</b> 1:23 <b>58</b> 68:11,12</p> <hr/> <p style="text-align: center;"><b>6</b></p> <p><b>6</b> 72:8 <b>60</b> 70:22 <b>61</b> 3:14</p>
--	---	--	--	---

**64** 3:11

---

**7**

---

**7** 29:12

**7th** 27:8,24 29:1

68:5

**700** 2:7

**713** 2:8

**714** 1:23

**753** 90:5

**77057** 2:8

**785-4600** 2:21

---

**8**

---

**8** 65:9

**8th** 29:1

**80** 81:5

**85** 87:24

---

**9**

---

**9** 65:22 66:4

**90067** 2:21

**92701** 1:23

**94111** 2:15

**9472** 1:21 90:16

**952-4334** 2:8

**984-8700** 2:16