

Q. Did I ask the SP to spy on Bruno?

A. I never talked to anyone at SP about the matter.

Q. Did I direct SP to develop or reconstruct records?

A. I never spoke to anyone at SP. I only asked Bill H. if there was anything responsive to the reporter's request.

Q. Why wasn't "normal" FOIL process followed.

A. There have been numerous requests for flight info since the first of the year. We'd provided the info before. The only difference was the travel assignments.

Q. Didn't you think the travel assignments were significant?

A. No and neither did anyone else. That because they don't show who the Senator might have met with.

Q. Did you discuss the matter internally before releasing the info?

A. I informed people that a new reporter was inquiring about the Gov's use of the aircraft. I reviewed

our materials carefully and asked for descriptions of certain events. When I mentioned Bruno records - the response was always the same - He'll simply say that he was conducting legis. meetings and based on his claim "you assume it's true. Moreover, even if he didn't have the Ottenstein decision.

Q So you didn't plant the story?

A As I noted before, reporters have been examining aircraft use for years - my interest was ensuring that the Gov not have any problems associated with his use of the aircraft.

Q Who would you have discussed the matter with internally?

A Baum, Nocenti, Rifkin - and each said that it was their understanding that as long as there are some business meetings it's ok to have political function. And that's what I thought as well - that comported with my experience in the Cuomo years.

Q Why did you tell Dickson an e-mail about the Long story

A He'd asked if there were complaints I said not to us, but I heard about problems before.

→ The facts

I understand the appearance issue. . . back in May, before the FOIA, I was asking questions about the use of the photos by Bruno

- I was also asking about Eliot's use, Pataki's use and yes Bruno's use
- Why? Because reporters were asking me and I was informed that a FOIA was coming

~~subseq.~~

- I never did anything with the info, until I was FOIAed

- I would have talked to everyone who matters about what we know

→ what did we know

- Eliot had a problem with our trip
- Pataki had a problem
- there were questions about what Bruno was doing

→ was it inappropriate to ask questions about Bruno's use

→ what info did I receive that wasn't clearly public info

Who did you discuss the matter with internally?

What did you say to them?

Did anyone ever suggest to you that you were doing something improper?

Don't you think travel info could jeopardize security?

Did you think the info was damaging to the Senator?

Did you think that the Senator was misusing state aircraft?

Did you give the info to the reporter with the intention of embarrassing him?

What did you think would happen when the info got out?

What did you think of the story?

pretty good understands

biggest concerns

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5-17-07

from Howard to DD

getts →

→ Gov &

→ PAC. - can lesson SR.

from Howard to DD

CV Stew ... global investor firm

5-17-07

checked the firms

Howard to DD

report → Bucky Phillips

5/5

5-23

DD to Rick

→ B. Hill says record exist

→ last two trip

→ re medic

6-3 June 3 I guess we know why they
have

↓ my actions → viewed objectively

↓ political dirty tricks → very concerned
for me

↓ looks like → humiliate
→ can
was to be re interrogate on Monday

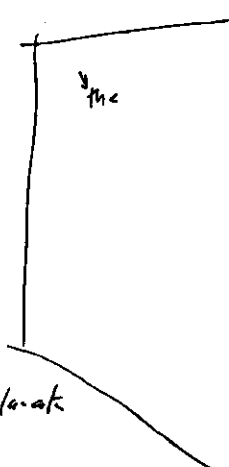
Sean Maloney → best response
→ issue a short apologetic sounds explanatory

Merica info from SP thru Howard
↓ no such thing was happens

Dean was subtle, explanatory

Rich → will give affidavit or decline to testify

↓ prefer sufficient response →
short carefully worded statement
↓ issue an apology



Did I ask the SP to keep track of Mr Bruno activities

Did you ask someone to ask the SP to do so?

Are you aware of anyone asking the SP to do so?

What were nature of your discussions with Mr H on this matter?

Could Mr H have misconstrued your comments to be a request to collect information?

Could he have construed "is there anything responsive" as a directive to collect info?

Were all of your conversations with Mr H on this matter related to reporters inquiries?

Were you aware of conversation Mr H had with SP?

Did he tell you about his conversations with SP?

When did he provide the information?

What prompted the reporters inquiries?

What did you think when you first heard the reporter's question?

Can you name the reporters?

- Can I use notes in my deposition
 - a timeline, and other material such as the FOIL
- Where will the interview take place?
- Who will conduct it?
- What is the order of interviewing for the day?
- What interaction will I have with you?
- Will they put exams in front of me and ask me to explain?
- Reporters have a privilege - protecting their source. No such privilege exists for me... if a reporter tells me something in confidence, I can't refuse to divulge
- What's the use of it
 - not spying
 - accessing info and activities

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