

BEFORE THE OHIO ELECTIONS COMMISSION

DEPOSITION

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IN THE MATTER OF:	:
	:
JEAN SCHMIDT,	:
	:
Plaintiff,	:
	:
v.	: Case No.
	:
	: 2009E-003
DAVID KRIKORIAN,	:
	:
Defendant.	:
	:
	:

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Saturday,
August 8, 2009

National Whistleblowers
Center
3238 P Street, N.W.
Washington, D.C. 20007

DEPOSITION OF:

SIBEL DENIZ EDMONDS

called for examination by Counsel for the
Defendant, pursuant to Notice of Deposition,

at the National Whistleblowers Center, located
at 3238 P Street, N.W., Suite 690, Washington,
D.C., when were present on behalf of the
respective parties:

APPEARANCES:

On Behalf of Plaintiff Jean Schmidt:

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On Behalf of Defendant David Krikorian:

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On Behalf of Deponent Sibel Deniz
Edmonds:

MICHAEL D. KOHN, ESQ.
Of: Kohn, Kohn & Colapinto, LLP
3233 P Street, N.W.

Washington, D.C. 20007

Tel: (202) 342-6980

1 P R O C E E D I N G S

2 (10:32 a.m.)

3 VIDEO OPERATOR: Will counsel and
4 others present, please introduce themselves
5 and state whom they represent?

6 MR. MARINO: Dan Marino here on
7 behalf of Mr. Krikorian.

8 MR. FEIN: Could I interject an
9 objection here?

10 Is Mr. Marino admitted in this
11 case to practice before the Ohio Elections
12 Commission?

13 MR. MARINO: Why don't you --

14 MR. FEIN: What is the answer to
15 that question, sir?

16 MR. MARINO: Why don't you go
17 ahead and identify yourself?

18 MR. KRIKORIAN: David Krikorian.

19 MR. MARINO: Do you want to?
20 Who's the next gentleman?

21 MR. ELWOOD: Phil Elwood. I work
22 at KL.

1 MR. MARINO: I'd like to have
2 everyone identify themselves.

3 MR. FEIN: Sure.

4 MR. MARINO: And you're Mr.?

5 MR. FEIN: I'm Mr. Bruce Fein.
6 I'm counsel for Jean Schmidt in this
7 proceeding.

8 MR. MARINO: Okay.

9 MR. KOHN: I'm Michael Kohn with
10 Kohn, Kohn & Colapinto, representing the
11 witness Sibel Edmonds, and with me are three
12 law clerks. That's it.

13 VIDEO OPERATOR: Thank you.

14 Will the court reporter please
15 swear in the witness after which we can begin?

16 THE REPORTER? Would you please
17 raise your right hand?

18 Whereupon,

19 SIBEL DENIZ EDMONDS
20 was called as a witness by counsel for the
21 Defendant and, having been first duly sworn,
22 was examined and testified as follows:

1 DIRECT EXAMINATION

2 BY MR. MARINO:

3 Q Okay. Good morning, Ms. Edmonds.
4 I introduced myself to you off the record. My
5 name is Dan Marino. I represent Mr. Krikorian
6 with the law firm of Luque, Geragos & Marino
7 here in Washington, D.C.

8 MR. FEIN: I'm going to interpose
9 an objection to Mr. Marino asking the question
10 because there's no showing that he has been
11 authorized to participate in the proceeding at
12 issue in this particular matter.

13 MR. MARINO: I want to thank you
14 for coming this morning.

15 MR. FEIN: Does Mr. Marino have --
16 Mr. Marino, do you have any proof that you've
17 been admitted to practice in the proceeding
18 before the Ohio Elections Commission in the
19 case of Jean Schmidt v. David Krikorian?

20 BY MR. MARINO:

21 Q I'd like to show you what's been
22 marked --

1 MR. FEIN: I interpose a standing
2 objection, and I will to every single question
3 Mr. Marino asks until he establishes and
4 testifies or otherwise documents that he is
5 authorized to participate in this proceeding,
6 and that if he continues to do this, we will
7 consider seeking sanctions, including the
8 unauthorized practice of law in Ohio.

9 BY MR. MARINO:

10 Q -- to show you what's been marked
11 as Exhibit 1 to your deposition. I only have
12 one copy of it. It purports to be a subpoena
13 from the Ohio Elections Commission for your
14 testimony today.

15 Have you seen that before?

16 A My attorney's office received it.
17 I believe I have seen the PDF version of that.

18 (Whereupon, the document referred
19 to was marked as Edmonds
20 Deposition Exhibit No. 1 for
21 identification.)

22 BY MR. MARINO:

1 Q Okay, and I take it that you're
2 here in response to that subpoena today,
3 correct?

4 A Correct.

5 MR. FEIN: Now, I interpose an
6 objection again because the documentary
7 evidence shows the Ohio Election Commission
8 communicated to Mr. Marino that they had no
9 intent of enforcing their subpoena beyond the
10 territorial jurisdiction of Ohio, and that Ms.
11 Edmonds was under no compulsion to attend
12 today, and that was made abundantly clear, and
13 that's a misstatement of the record made by
14 Mr. Marino, and I highly object to that
15 mischaracterization of why Ms. Edmonds is here
16 today.

17 MR. KOHN: Let me clarify. Ms.
18 Edmonds is here today with respect to that
19 subpoena as a courtesy rather than traveling
20 to Ohio.

21 MR. FEIN: That is simply a simply
22 a misstatement of the record in this case,

1 which made quite clear that the Ohio Elections
2 Commission was not ordering Ms. Edmonds to
3 appear, that the Justice Department also
4 considered the subpoena that was issued to her
5 here, and that if she wanted to come to Ohio
6 and they wanted to issue a subpoena in Ohio,
7 that's up to them.

8 That is not what happened in this
9 particular case. That is a misstatement of
10 the record.

11 MR. KOHN: Well, I guess you don't
12 understand "courtesy" within the legal
13 community --

14 MR. FEIN: You don't understand
15 there are documents that have been issued in
16 this particular case. In particular, the
17 document issued by Mr. Phil Richter, the
18 counsel for the Ohio Election Commission, said
19 there was no jurisdiction, and they did not
20 intend to enforce this subpoena in the
21 District of Columbia, and that there was no
22 compulsion on Ms. Edmonds to attend this

1 deposition today.

2 MR. MARINO: Okay. Kind of makes
3 you wish you went to law school, right?

4 BY MR. MARINO:

5 Q All right. I do want to thank you
6 for coming today, Ms. Edmonds, and I did talk
7 to your counsel before the deposition and
8 asked him to communicate and I'll tell you the
9 same thing. I just became involved recently
10 in this case, and I'm going to be asking you
11 a series of questions about -- some about your
12 background and some about some of the things
13 that we've seen in the press in connection
14 with some of the issues you've had with the
15 U.S. government, et cetera.

16 And I do want to sort of advise
17 you that until the last couple of days, I
18 really had heard nothing about this case, and
19 so some of my questions are going to seem
20 somewhat elementary, and it's not because I'm
21 playing Colombo or anything like that. It's
22 just because I really don't know the

1 information.

2 And in a sense, I think that will
3 be good because what we're hoping to do with
4 your testimony is provide some education to
5 the folks involved in this thing. So in the
6 process of educating me, maybe we'll be
7 educating some of the listeners, people who
8 will see your deposition testimony.

9 Have you had your deposition taken
10 before?

11 A In business maybe.

12 Q Okay. Then you understand the
13 process. As I said, I'm going to be asking a
14 series of questions and I'm just going to ask
15 you to answer them to the best of your
16 ability. You'll maybe see objections from
17 people from time to time, and unless someone
18 tells you not to answer the question, it's
19 okay to go ahead and answer it. Okay?

20 And of course, you can take your
21 guidance from your counsel on when to answer
22 a question and when not to.

1 If at any time you want to stop
2 and take a break, talk to your lawyer, get a
3 drink of water, whatever, just let us know,
4 and we'd be happy to accommodate that.

5 I'd like to start if we could with
6 just a little bit of your background, just for
7 the record. I understand from some of the
8 reading I did that you, I think, were born in
9 Iran; is that correct?

10 A Correct.

11 MR. FEIN: I object. This is the
12 standard that Chris Finney asserted in Mr.
13 Krikorian's deposition when the question was
14 raised this fall to Mr. Krikorian, and I'm
15 reading from the transcript of his deposition,
16 page 9.

17 "Are you a lifetime Cincinnati
18 area resident or did you move here at some
19 point?"

20 Mr. Krikorian's attorney, Mr.
21 Finney, "Objection. What does this have to do
22 with the case?"

1 And the statement that we agreed
2 to with Mr. Finney, that unless there's a
3 particular question that goes to the
4 allegations of falsehood and intentional
5 falsehoods in this case, it is off limits.
6 That's the standard that Chris Finney, counsel
7 for Mr. Krikorian, established in his
8 deposition, and it applies here in the same
9 way.

10 Whether she was born in Iran has
11 nothing to do with the allegations that I can
12 see that Jean Schmidt has lodged against Mr.
13 Krikorian. Unless there's some demonstration
14 of some relevance, then I object to answering
15 that question the same way that Mr. Finney
16 objected to Mr. Krikorian answering whether he
17 was a lifetime Cincinnati resident.

18 BY MR. MARINO:

19 Q I think you answered that, yes,
20 you were born in Iran.

21 A Yes.

22 Q And you ultimately moved to Turkey

1 at some point; is that correct?

2 A Correct, because I --

3 MR. FEIN: And I also have a
4 standing objection on relevance for the same
5 reasons.

6 BY MR. MARINO:

7 Q I'm sorry. I didn't get the
8 answer.

9 A Yes, because I was always a
10 Turkish citizen because my parents were
11 Turkish. So we were there because of my
12 father's job, and then we moved back to
13 Turkey.

14 Q All right, and I understand you
15 speak a number of languages in addition to
16 English, correct?

17 A Correct.

18 Q What are --

19 MR. FEIN: Objection.

20 BY MR. MARINO:

21 Q -- those languages?

22 A Turkish is my primary, my mother

1 language.

2 Q Okay.

3 A After that, Farsi. That's the
4 language spoken in Iran.

5 Q Okay.

6 A And I also have conversational
7 abilities in Azerbaijani.

8 MR. FEIN: I just interpose a
9 standing objection so we can move along on
10 relevance grounds that I don't believe that
11 there's been any establishment that the
12 witness knows anything about the allegations
13 in the complaint. So just to speed things
14 along, I'll have a standing objection on
15 relevance to every single question asked until
16 there's some connection between her knowledge
17 of the complaint and the question that relates
18 to the facts in the complaint.

19 BY MR. MARINO:

20 Q And at some point you moved to the
21 United States, correct?

22 A Correct.

1 Q And when was that?

2 A 1988, July 1988.

3 Q All right, and can you just tell
4 us about your educational background, please?

5 A Sure. I have a Master's degree in
6 public policy from George Mason University.
7 I have Bachelor's degrees in psychology and in
8 criminal justice from George Washington
9 University. I have a AS (phonetic) degree
10 from Northern Virginia Community College in
11 biology, and I finished high school in Turkey.
12 I graduated in 1988 in Istanbul.

13 Q And I understand, again, just to
14 move things along a little quickly, that at
15 some point you became a contract employee with
16 the Federal Bureau of Investigations; is that
17 correct?

18 A Correct.

19 Q And when was that?

20 A I started working for the FBI on
21 around September 15, 2001.

22 Q And when you became employed at

1 the FBI, did you receive a top secret security
2 clearance?

3 A Yes, I did.

4 Q And how did it come to be that you
5 were working for the FBI?

6 A Okay. I will try to summarize the
7 story so it's not -- it won't take too long.
8 When I was studying for my Bachelor's degree,
9 criminal justice/psychology, I had applied for
10 internship position with the FBI, and this
11 would be around '97, 1997, 1998, and they
12 never responded to me and except that they
13 were interested in my linguistic abilities
14 because I spoke Turkish and Farsi.

15 And then I didn't hear back from
16 them, and I was contacted around September 11,
17 2001, and they said they had obtained top
18 secret clearance for me, and they needed my
19 services for translation in Turkish and Farsi,
20 and they wanted me to start immediately, and
21 because I couldn't work full time, I took the
22 contractor's position with the FBI for

1 translation of those languages, and to a
2 certain degree Azerbaijani.

3 Q All right, and so can you describe
4 what your job was with the FBI aside from
5 translating those languages?

6 A I assisted Special Agents, both my
7 -- the primary supervisory Special Agents in
8 Washington, D.C. field office, but also
9 Special Agents in charge of various
10 counterintelligence and counterterrorism
11 investigations around the country, and those
12 were different FBI field offices.

13 Q Now, when you refer to
14 counterintelligence operations, can you just
15 tell us what that means?

16 A Counterintelligence operations in
17 the FBI had to do with collecting information,
18 monitoring -- and monitoring particular target
19 foreign entities in the United States.

20 Q And just to -- I'm probably over
21 simplifying it, but it's a matter of public
22 record that the FBI may have people who listen

1 to telephone conversations, other types of
2 intercepted conversations that are in foreign
3 languages --

4 MR. FEIN: Leading question.

5 BY MR. MARINO:

6 Q -- and they have translators who
7 translate those, correct?

8 MR. FEIN: Objection. Leading.

9 THE WITNESS: Information could
10 have been both conversational audio, but also
11 documents, written documents, or in certain
12 cases direct surveillance.

13 MR. MARINO: And --

14 MR. KOHN: For the record, I'd
15 just like to note that I've asked the witness
16 to limit her responses only to the information
17 that she believes to be publicly available or
18 she has learned from sources outside of her
19 employment. So I just wanted that on the
20 record.

21 MR. MARINO: Okay, and I
22 appreciate that, and you know, I have had in

1 the past the chance to work with intelligence
2 officers in these kinds of cases, and I
3 realize that you can't get into sources and
4 methods and so forth. If I'm straying into
5 that area in any way, just let me know and
6 I'll back off.

7 BY MR. MARINO:

8 Q It is a matter of public record,
9 however, that our government through the FBI
10 primarily does do counterintelligence work
11 with respect to foreign nationals and foreign
12 organizations, correct?

13 A Correct.

14 Q And that would include Turkish
15 organizations?

16 A Correct.

17 Q And my understanding is that you
18 were terminated by the FBI or at least your
19 contract was terminated in was it March or
20 April of 2002?

21 A April 2002.

22 Q All right. And so from September

1 of 2001 until April 2002, you were engaged in
2 this activity of listening to and translating
3 documents and conversation audio, correct?

4 A Correct.

5 Q And, again, these were materials
6 that were related to counterintelligence
7 operations, correct?

8 A Not limited to
9 counterintelligence. Some of them crossed
10 over criminal related investigations, and also
11 counter -- I also translated for
12 Counterterrorism Division.

13 Q So all three of those.

14 A Correct.

15 Q Now, -- and I take it that you
16 were translating obviously the languages that
17 you were fluent in, correct? Turkish, Farsi.

18 A Although initially I performed
19 translation for all three languages, but
20 within a few weeks because of the need in the
21 FBI, urgent need, I was placed primarily on
22 Turkish, and that became my main language that

1 I used to work for the FBI.

2 Q So, again, I know it sounds
3 elementary, but just by way of background, you
4 were translating documents and conversations
5 that were created by and spoken by people who
6 spoke Turkish, correct?

7 A Correct, but because the targets
8 could also speak English, and this couldn't
9 have been known to the FBI agents until I
10 first went through the information, I also had
11 to transcribe and make notes of pertinent
12 conversation, pieces of conversation in
13 English also. So I had to listen to a lot of
14 English conversation and notify my bosses in
15 the FBI of the ones that were very important.

16 Q Okay. Now, let me jump ahead to
17 April 2002, and you said your contract was
18 terminated by the FBI. Can you tell us why
19 that happened?

20 A After I was hired by the FBI in
21 September 2001, about a month or so later, FBI
22 hired another language specialist for Turkish

1 Division in the FBI's Washington field office,
2 and a few weeks after this person, Melek Can
3 Dickerson -- M-e-l-e-k, middle name C-a-n,
4 last name Dickerson, D-i-c-k-e-r-s-o-n -- and
5 she also had top security clearance.

6 My main primary agent for Turkish
7 counterintelligence and I, we through various
8 evidence and incidence became aware that she
9 had worked for certain Turkish organizations
10 and entities that were directly the targets of
11 FBI counterintelligence investigations, and
12 that she had lied in her application, and that
13 for unknown reasons to us -- I don't know why
14 -- the FBI security background check had not
15 caught that important information despite even
16 her tax filing records.

17 And not only that; Melek Can
18 Dickerson and her husband, at the time he was
19 a major with the Defense Intelligence Agency,
20 Major Douglas Dickerson, and he was working
21 for Douglas Feith's office and was a
22 coordinator with the State Department on the

1 Turkey Republics in Central Asia; both husband
2 and wife, Melek Can Dickerson and her husband,
3 they were still associating and had working
4 relationships with these Turkish entities,
5 individuals and organizations that were the
6 targets of FBI investigations.

7 As we started reporting this to
8 our superiors, initially there was a panic in
9 the department, but as it went up further to
10 the headquarters -- this is the FBI
11 Headquarter -- they started -- the FBI
12 Headquarter started retaliating against me and
13 eventually they terminated my contractor.

14 And there is an Inspector
15 General's report available publicly that came
16 out, I believe, in 2005 that confirmed all my
17 allegations and the fact that FBI fired me
18 simply due to my activities in whistleblowing
19 in making this known to the FBI and later to
20 the Congress, and that the evidence on the
21 translator in question was supported by other
22 witnesses from the FBI and documents.

1 So that's a public document
2 report.

3 Q All right. There's an
4 unclassified version of that report which has
5 been made public, correct?

6 A Correct.

7 Q And that report basically
8 substantiated the allegations that you were
9 making regarding Ms. Dickerson, correct?

10 A Correct.

11 Q And the concerns that you had
12 regarding Ms. Dickerson pertained to espionage
13 really, no?

14 A Correct.

15 Q And in part -- and that was in
16 part because of the fact that she was
17 associated with these -- she and her husband
18 were associated with these targets of
19 counterintelligence operations.

20 A Correct.

21 Q Who were Turkish entities,
22 organizations; is that correct?

1 A Yes, and certain U.S. entities who
2 were also part of these espionage related
3 operations.

4 Q Was one of the organizations that
5 you were concerned about the American Turkish
6 Council?

7 A Yes.

8 Q Were there others?

9 A Yes.

10 Q Can you identify them, please?

11 A Certain Turkish diplomatic
12 community in Washington, D.C. and other
13 locations and other Turkish cultural and
14 business related associations and lobbying
15 groups in various -- with various chapters in
16 various cities and states in the United
17 States.

18 Q All right. Without asking you
19 specifically who the targets were at this
20 point, when you hear the term -- well have you
21 ever heard the term "Turkish lobby"?

22 A Yes.

1 Q What does that mean to you?

2 A Can you be more specific? It
3 means many things to me.

4 Q I mean just what comes to mind
5 when you -- again, I came into this a couple
6 of days ago. I've seen the term "Turkish
7 lobby." I've seen people referring to it. If
8 someone uses that term, can you tell us either
9 generally or specifically what it means to
10 you?

11 A Correct. It means two sets of
12 things. One set is the overt Turkish lobby
13 that is classic lobbying for its interests,
14 governmental relationship interests, commerce,
15 et cetera, and the other category is the
16 covert activities and operations by the lobby
17 that many of which may not be legal.

18 Q And when we talk about the overt
19 Turkish lobby, can you identify the
20 organizations you're thinking about here?

21 A There are so many. American
22 Turkish Council is the primary organization,

1 which is -- directly works with the diplomatic
2 community in the United States, Turkish
3 diplomatic community, that is. ATAA was
4 another umbrella under which there are various
5 locations and chapters, such as ATA Chicago,
6 ATA Patterson, New Jersey, ATA D.C., and also
7 some that are identified as cultural, such as
8 TACA, Turkish American Cultural Association.
9 There are hundreds of small chapters, and I
10 don't know some of these, but the main ones
11 would be American Turkish Council, ATAA, ATA
12 and its various chapters throughout the
13 country in the United States, TACA. Turkish
14 American Business Association is another
15 primary one.

16 Q ATAA, is that the Assembly of
17 Turkish America Associations?

18 A I believe that's what it is.

19 Q How about have you heard of the
20 Turkish Coalition of America?

21 A Just through some cursory reading
22 recently.

1 Q Okay, and are you familiar with an
2 organization called the Turkish American Legal
3 Defense Fund?

4 A I don't recall.

5 Q Have you ever met Mr. Fein before
6 who is present here today?

7 A I haven't met him personally.

8 Q Are you aware of the fact that
9 he's associated with the Turkish American
10 Legal Defense Fund?

11 A I just -- I didn't know that.

12 Q The organizations you identified
13 just now were I think you identified as -- or
14 the ones you identified, not the ones I asked
15 you about -- the ones you identified, I think
16 you were listing as part of the overt Turkish
17 lobby, correct?

18 A Okay. Can you repeat that
19 question?

20 Q Yes. I'm sorry. I was asking
21 about what was meant by the Turkish lobby, and
22 you said that there were overt forms of the

1 Turkish lobby and there were covert forms.
2 The organizations we were talking about, are
3 they part of the overt Turkish lobby, if you
4 will?

5 A They are part of both overt and
6 covert.

7 Q Okay. So when you talk about the
8 covert Turkish lobby, what are you referring
9 to there?

10 A Activities that would involve
11 trying to obtain very sensitive, classified,
12 highly classified U.S. intelligence
13 information, weapons technology information,
14 classified congressional records, recruiting
15 -- recruiting key U.S. individuals with access
16 to highly sensitive information, blackmailing,
17 bribery. These are some of the ones that just
18 perhaps -- and there are many others that I'm
19 unable to think of.

20 Q Well, by way of example, I think
21 you indicated that Ms. Dickerson -- by the
22 way, is she ever referred to as Jan Dickerson?

1 A Correct. That's how she went at
2 the FBI, and as far as I know, elsewhere she
3 used her middle name in the United States, Jan
4 Dickerson.

5 Q Now, I read in some of the reports
6 about an incident where Ms. Dickerson arrived
7 -- showed up at your home unexpectedly on
8 Sunday.

9 A Correct.

10 Q And can you tell us what happened
11 when that -- when she arrived there?

12 A Sure. She came to my house with
13 her husband, who at the time was Major Douglas
14 Dickerson, and he identified himself first as
15 the officer for Air Force, but later said that
16 his real task was operations involving records
17 procurements by countries in Central Asia and
18 Turkey, and that he directly worked with
19 Douglas Feith and Paul Wolfowitz.

20 Q Okay.

21 A At the time this would be 2001,
22 December.

1 Q All right, and they came to your
2 home on Sunday morning.

3 A Yeah, social visit they said.

4 Q And during that discussion, during
5 that visit, did you come to believe that Ms.
6 Dickerson was recruiting you?

7 A Yes, I did.

8 Q For what?

9 A They wanted me to joint the
10 American Turkish Council, and they told me
11 that I would be provided with many benefits,
12 both monetary but also prestigious benefits,
13 if I were to enroll with them.

14 Q Okay, and did you know at the time
15 that the American Turkish Council was one of
16 the counterintelligence targets?

17 A Absolutely, yes.

18 Q And did you believe Ms. Dickerson
19 knew that as well?

20 A She -- yes, and the fact because
21 her husband associated with American Turkish
22 Council and she worked for them.

1 Q And did you report this effort to
2 recruit you to your superiors?

3 A Immediately. The next day I
4 reported it in writing to my direct
5 administrative supervisor, and a few days
6 later to my agent, who was my supervisory
7 agent, but also again in writing to the FBI's
8 Personnel Security Office, because I was
9 obligated for my top secret clearance to
10 report recruitment attempts.

11 Q Now, why if you can tell me, why
12 would the American Turkish Council be a
13 counterintelligence target?

14 A Certain individuals form that
15 organization, American Turkish Council,
16 certain individuals were involved with other
17 individuals outside American Turkish Council,
18 which includes diplomatic community and
19 Turkish diplomatic community -- sorry -- and
20 other subchapter organizations.

21 I say "subchapter" because even
22 though it's not known, ATA is not formally

1 known as American Turkish Council's
2 subchapter, but they do a lot of activities
3 through ATA in various cities and states in
4 the United States, and those individuals were
5 involved in operations that were
6 counterintelligence related, and not -- if
7 they were against the United States interest
8 on security,

9 Q Okay. Was there -- let me be sure
10 I have this correct -- was there a particular
11 individual at the American Turkish Council who
12 had connections to the Turkish Embassy in
13 Washington at that time?

14 A There were several people.

15 Q And again, just because I don't
16 know, to your knowledge, was the American
17 Turkish Council an organization that was
18 supported by the Turkish government?

19 A I don't know directly, but
20 indirectly --

21 MR. FEIN: That's conjecture.

22 THE WITNESS: -- I mean --

1 MR. FEIN: Object, object. Only
2 speak based upon your personal knowledge.
3 Conjecture and speculation otherwise, I move
4 to strike your answer unless it's based upon
5 personal knowledge.

6 THE WITNESS: Based on --

7 MR. MARINO: You can answer the
8 question --

9 THE WITNESS: Based on my
10 personal --

11 MR. MARINO: -- just as I asked
12 it.

13 THE WITNESS: -- knowledge, they
14 were indirectly supporting it, supporting.
15 Turkish government was indirectly supporting
16 the American Turkish Council, certain
17 individuals and operations and projects
18 against.

19 BY MR. MARINO:

20 Q Okay, and how were they supplying
21 that support?

22 A Without getting into specifics,

1 it's hard to explain. They could arrange for
2 intermediary business individuals to make
3 payments for certain activities, lobbying
4 activities or intelligence gathering
5 activities or activities involved in weapon
6 procurement deals between Turkey and the
7 United States.

8 Q So one of the means, basic means
9 of support would be money, correct?

10 A Money when they could, yes.

11 Q So if I said that the American
12 Turkish Council, for example, was an
13 organization supported by the Turkish
14 government, that wouldn't be an unreasonable
15 assumption?

16 A Correct.

17 Q What about some of these other
18 members of the Turkish lobby that we've talked
19 about? Would I be unreasonable in assuming
20 that those organizations might be receiving
21 support from the Turkish government?

22 A They were all receiving -- the

1 ones that I knew of, yes, theoretically.

2 MR. FEIN: I think the question
3 was -- can I just clarify for my own mind? --
4 the question was based upon the witness'
5 personal knowledge, she knows that all the
6 other organizations that were targets, they
7 were receiving money from the government of
8 Turkish.

9 MR. MARINO: Okay.

10 MR. FEIN: Is that the question
11 and answer?

12 MR. MARINO: Mr. Fein is going to
13 have an opportunity, I think, to ask some
14 questions when I'm finished. Maybe now you
15 and I will just have questions and answers.

16 BY MR. MARINO:

17 Q So what happened when you reported
18 to your superiors at the FBI that Ms.
19 Dickerson were trying to recruit you for this
20 organization, American Turkish Council?

21 A At the initial stage -- this is
22 for Washington field office before it went all

1 the way up to the FBI Headquarters -- there
2 was environmental (phonetic) panic. The agent
3 I worked with, Special Agent Dennis Sharshar,
4 informed the counterespionage section,
5 department of the FBI; write a letter to the
6 FBI Headquarters, and he also asked for
7 immediate damage assessment because some of
8 the -- our FBI's counterintelligence primary
9 targets -- the targets were graded in
10 different -- they have different rates -- some
11 primary targets were the ones that Ms.
12 Dickerson was working with closely, and she
13 and her husband associating, but that was the
14 initial response.

15 Q Okay, and ultimately did they take
16 any action against Ms. Dickerson or her
17 husband?

18 A Again, initially during this
19 initial stage, they, I believe, they asked her
20 to take polygraph, and they also -- the FBI's
21 counterespionage unit, they set up the date
22 and time to have some kind of an

1 interrogation. They called it the surprise
2 interrogation session with her that they set
3 up, but they were prevented from pursuing it
4 later.

5 Q And they also had you take a
6 polygraph test, correct?

7 A Correct.

8 Q And the polygraph examiners found
9 that you were not deceptive?

10 A Yes, I was absolutely truthful.

11 Q Okay. Now, in your experience
12 both at the FBI and since then, what is it
13 that the Turkish lobby -- what kinds of issues
14 are they traditionally concerned about in our
15 country?

16 A Various issues that I'm aware of.
17 Some, the more overt ones, the foreign policy
18 of the United States. Another, the weapon
19 procurement from the United States and the
20 military aid, and political front is being
21 able to secure grants from United States
22 Congress for their operations or some of them,

1 joint operations in Central Asia and Middle
2 East, the front companies for construction or
3 road building, et cetera, and to be able to
4 secure these grants from Congress for those
5 front organizations.

6 Armenian genocide and preventing
7 that from ever being brought up or passing
8 Congress or even discussed in the mainstream
9 media is another political objectives that
10 they pursue very strongly. These are the
11 overt ones. So those are -- these are the
12 overt ones.

13 Q All right. In your experience
14 then, these are issues that the Turkish
15 government is concerned about?

16 A Not only, yes, Turkish government
17 is concerned, but also other entities with
18 their own special interest who are very
19 concerned about these issues.

20 Q Can you identify those?

21 A Some of them are business
22 entities. The others are more like clusters

1 of criminal gangs would be the best way to
2 describe them that may or may not be
3 independent from the central government.

4 Q You mentioned the Armenian
5 genocide issues. My understanding is that
6 there have been resolutions proposed,
7 introduced, discussed in Congress to recognize
8 the Armenian genocide, correct?

9 A Correct.

10 Q And those have been controversial
11 resolutions over the years?

12 A Correct.

13 Q And so when you refer to this
14 Turkish lobby regarding that as an issue, it
15 would be their intent to prevent such a
16 resolution from being passed by the U.S.
17 Congress, correct?

18 A Correct.

19 Q Now, am I correct that -- I know
20 you don't work for the FBI now, but would you
21 consider yourself sort of still involved in
22 some of the issues that we've been discussing?

1 A Somewhat, yes.

2 Q Am I correct that you have a blog
3 on the Internet?

4 A Yes.

5 Q You post material on that?

6 A Yes.

7 Q One of the things that I saw on
8 your blog is something called the State
9 Secrets Privilege gallery. Do you know what
10 I'm referring to?

11 A That is on my personal Website
12 that is public, JustACitizen.com, correct.

13 Q Okay. And when you talk about the
14 State Secrets Privilege, I think I know what
15 you mean by that. Can you tell us what you're
16 referring to?

17 A State Secrets Privilege is this
18 arcane executive privilege that the
19 government, United States government, invoked
20 in my case twice in order to quash my court
21 case, but also prevent the public knowledge of
22 information I reported to Congress, to the

1 Inspector General's Office, and to the FBI and
2 the Justice Department itself, and basically
3 it acts as a gag order, and the only
4 justification the U.S. government provided for
5 it was "she may be right with whatever she
6 knows and she believes is important and
7 crucial, but because the information she has
8 may threaten and affect certain U.S.
9 diplomatic relations and national security, we
10 are asking the courts and the Congress as
11 executive privilege called State Secrets
12 Privilege.

13 Q Okay, and just to bring me up to
14 date, you filed a lawsuit against the
15 government at some point, correct?

16 A Correct.

17 Q And that was because of your
18 termination by the FBI, right?

19 A And my First Amendment rights,
20 correct.

21 Q And if I understand it correctly,
22 the government used the State Secrets

1 Privilege to get that lawsuit thrown out.

2 A The first invocation, yes.

3 Q Was there a second invocation?

4 A Yes. I was -- my deposition was
5 subpoenaed by a law firm called Motley Rice.
6 I think it's M-o-t-l-e-y, second word R-i-c-e,
7 who represented thousands of 9/11 victims'
8 family members, and they subpoenaed my
9 deposition, and I believe this was in 2004.
10 That was when the government, FBI and the
11 Justice Department, went to the judge who was
12 sitting on my case, and asked him to quash it
13 based on State Secrets Privilege, and they
14 cited the State Secrets Privilege together
15 with affidavits from the various individuals
16 in the Justice Department, including the
17 Attorney General, and asked the judge to quash
18 that deposition for the second time.

19 Q So these are lawyers who are
20 representing families of the 9/11 victims,
21 correct, who wanted to get information from
22 you?

1 A The lawyers of the family victims,
2 yes, victims' families, correct.

3 Q And did you understand why they
4 thought you had relevant information?

5 A Macro level, yes. I didn't know
6 what they were planning to ask specifically,
7 but it has to do with certain Turkish lobby
8 and organizations in the United States who
9 also had certain dealings with Saudi Arabian
10 related financial and lobby organizations in
11 the United States and cases that would have
12 been -- that would have involved both Saudi
13 Arabia and Turkey jointly were doing certain
14 things here in the United States, but also
15 outside the United States.

16 Q Okay, and I think you said earlier
17 basically the government prevented you from
18 getting that information to the families of
19 the 9/11 victims, correct?

20 A Correct. It's been five years,
21 but to my best of knowledge, they forced the
22 party who was subpoenaing me to submit

1 questions, and they said all those questions
2 are classified and covered by the State
3 Secrets Privilege and they invoked
4 (inaudible.)

5 Q All right. Now, on that Website
6 and this States Secrets Privilege gallery, it
7 seems like you have photographs of various
8 individuals, correct?

9 A Yes.

10 Q Is Dan Burton one of the people
11 who's in the gallery?

12 A His picture is there, yes.

13 Q Okay. Why is his picture there?

14 A I can't discuss the details of
15 those individuals not legal activities in the
16 United States, but those pictures, his and
17 others, are there because State Secrets
18 Privilege was mainly involved to cover up
19 those individuals illegal, extremely illegal
20 activities against the United States citizens
21 who were involved in operations that were,
22 again, against order foreign government and

1 foreign entities against the United States'
2 interests.

3 Q And Dan Burton is a
4 representative, member of Congress from
5 Indiana; is that correct? Is that the right
6 place?

7 A I believe he is.

8 Q Okay. What about -- it also
9 appears that you have a photograph of Dennis
10 Hastert in the gallery.

11 A Yes.

12 Q Okay, and why is his photograph
13 there?

14 A Again, just information that's
15 public, has been public, is he would be one of
16 the primary U.S. persons involved in
17 operations and activities that are not legal,
18 and they're not for the interest of the United
19 States but for the interest of foreign
20 governments and foreign entities.

21 Q Now, again, Mr. Hastert was the
22 Speaker of the House and Representative from

1 Illinois?

2 A At the time he was.

3 Q Can you tell me anything about
4 what your concerns are about Mr. Hastert?

5 A This information has been public.
6 The concerns, again would be several
7 categories. The acceptance of large sums of
8 bribery in forms of cash or laundered cash and
9 laundering is to make it look legal for his
10 campaigns, and also for his personal use, in
11 order to do certain favors and call certain --
12 call for certain actions, make certain things
13 happen for foreign entities and foreign
14 governments' interests, Turkish government's
15 interest and Turkish business entities'
16 interests.

17 Q Did you have reason to believe
18 that Mr. Hastert, for example, killed one of
19 the Armenian genocide resolutions in exchange
20 for money --

21 MR. FEIN: Leading question.

22 BY MR. MARINO:

1 Q -- money from these Turkish
2 organizations?

3 A Yes, I do.

4 Q So if I were to say that a member
5 of Congress -- if I were to just walk out on
6 the street and say, "Gee, I think members of
7 Congress have taken money from these Turkish
8 organizations in exchange for denying the
9 Armenian genocide," would that be an
10 unreasonable assumption on my part?

11 MR. FEIN: That's pure conjecture.
12 The individual --

13 THE WITNESS: No.

14 MR. FEIN: -- is totally
15 irrelevant.

16 BY MR. MARINO:

17 Q Are you aware of other members of
18 Congress, other than Mr. Hastert, taking money
19 from Turkish organizations in exchange for
20 denying the Armenian genocide?

21 A Yes, and not only taking money,
22 but other activities, too, including being

1 blackmailed for various reasons.

2 Q Stephen Solarz is on your gallery
3 as well. I believe he's a Representative from
4 New York. Is that correct? I'm really
5 guessing.

6 A He used to be.

7 Q Was, right?

8 A Correct. He is a registered
9 lobbyist for the -- or was registered lobbyist
10 for the government of Turkey.

11 Q And Mr. Hastert is also a
12 registered lobbyist for the government of
13 Turkey now?

14 A That's what I have read and it was
15 announced, yes, he is.

16 Q And why is Mr. Solarz in your
17 gallery, if you can tell me?

18 A Mr. Solarz and certain others in
19 the gallery, as lobbyists they also acted as
20 conduits to deliver or launder contribution
21 and other briberies to certain members of
22 Congress, but also in pressuring outside

1 Congress, and including blackmail, in certain
2 members of Congress.

3 Q And Mr. Solarz and others would be
4 doing this on behalf of these Turkish
5 organizations?

6 A And the Turkish government,
7 correct, both.

8 Q Would you say that -- would it be
9 your opinion that the Turkish government
10 through these Turkish organizations in the
11 United States and otherwise has corrupted
12 members of Congress?

13 MR. FEIN: Objection. She's just
14 asking for an opinion. This is supposed to be
15 a witness who testifies to facts.

16 THE WITNESS: Absolutely, yes.

17 BY MR. MARINO:

18 Q And is that based on you just
19 speculating or is it based on something else?

20 A Based on documented and provable,
21 tracked files and based on facts 100 percent,
22 documented facts.

1 Q Now, are some of those documented
2 facts that you're referring to, are they
3 public knowledge? Are they in the public
4 domain, in other words?

5 A Some of them through various, I
6 guess, reporting and other sources who have
7 been disturb (phonetic) and talk, yes.

8 Q And is your opinion based in part
9 upon your experience working on
10 counterintelligence matters for the United
11 States?

12 MR. KOHN: To the extent she can
13 answer that question without -- why don't we
14 just withdraw that question?

15 MR. MARINO: Okay. That's fair
16 enough.

17 BY MR. MARINO:

18 Q It looks like you have a photo of
19 Bob Livingston on your gallery as well.

20 A Yes.

21 Q And I believe he's a Congressman
22 from I want to say Louisiana at some point.

1 A Correct.

2 Q He was the one that was going to
3 be the speaker, but then left.

4 A Yes.

5 Q Why is he in your gallery?

6 A Until 1999, until he left for
7 activities that he was engaged, not very legal
8 activities on behalf of foreign interests and
9 entities, and after 1999 acting as a conduit
10 to, again, further foreign interests, both
11 overtly and covertly as a lobbyist, but also
12 as an operative.

13 Q When you say "as an operative,"
14 what do you mean by that?

15 A In order to explain, I will give
16 you an example maybe. Is that okay?

17 Q Sure.

18 A Just a hypothetical example or --

19 Q It's okay with me.

20 A Okay. If an individual has
21 companies set up and clients in offshore
22 islands like Cayman Islands, for example, and

1 is able to as an operative to launder money by
2 foreign entities that were obtained illegally,
3 and some of them had to do with narcotics, and
4 used these Cayman Islands offshore accounts to
5 do that, and then some of that money goes to
6 the congressional people, I would call that
7 not overt. I would call that covert
8 operations, covert operative, operations for
9 that person rather than the classic lobbying
10 operation.

11 MR. MARINO: All right. We've
12 been going for about 55 minutes. Why don't we
13 take a break, ten-minute break?

14 (Whereupon, the foregoing matter
15 went off the record at 11:22 a.m.
16 and went back on the record at
17 11:41 a.m.)

18 BY MR. MARINO:

19 Q Okay. Ms. Edmonds, have you ever
20 reviewed your Wikipedia entry?

21 A Once in a while I do. I don't
22 know when was the last time, but maybe a year

1 ago.

2 Q Okay. I mean, do you know have
3 you contributed to it or do you know people
4 who do contribute to it?

5 A No. I know many people, they give
6 me mainstream media articles or any reports.
7 They put it in there, but, no, I haven't
8 contributed.

9 Q When you've looked at it, have you
10 thought that it's generally accurate about
11 most of the statements?

12 A Yes, generally, yes.

13 Q One of the things that it
14 indicates in your biographical information is
15 that you've made certain allegations. Some of
16 them we've talked about a little bit, and I
17 wanted to ask you about some of the others.

18 One of the entries indicates
19 nuclear secrets black market, and it says,
20 "Edmonds alleges that in the course of her
21 work for the government she found evidence
22 that the FBI, State Department and Pentagon

1 had been infiltrated by a Turkish and Israeli
2 run intelligence network that paid high
3 ranking American officials to steal nuclear
4 weapons secrets," and they have some footnotes
5 for that, some cites.

6 Is that correct that you've made
7 those allegations?

8 A That information is correct, and
9 if ever -- you can get, I would say, those
10 government organizations and others. There's
11 another place missing there. They list the
12 State Department itself, but there is one
13 other place that's missing.

14 Q And what is that place?

15 A That would be RAND Corporation.

16 Q And can you tell me about the --
17 give me some more information about the
18 Turkish and Israeli run intelligence network
19 that is referred to there?

20 A This information has been public,
21 documenting methods of intelligence gathering.
22 Yes. Through certain U.S. officials,

1 executively appointed officials, foreign
2 entities, not necessarily or not only
3 government related; so if you say Israel and
4 Turkey, not only government but other entities
5 because it has multi-layers.

6 Q All right.

7 A Their operations, and some of
8 these layers sometimes they conduct their
9 operations independently and with the sole
10 purpose of obtaining a profit, and therefore,
11 the information they obtain, let's say, the
12 nuclear or weapons technology, weapons
13 technology related information doesn't
14 necessarily only go to Turkey or Israel, but
15 they sell it to the highest bidder. That's
16 how they operate. They contact their people
17 whether it's in ISI, in Washington, D.C. part
18 of the military attache for Pakistani
19 intelligence, or the certain Saudi business
20 people in Detroit may be contacted, and they
21 say, okay, and talk about these Turkish
22 entities. This is we have obtained this

1 particular DVD containing this, and this
2 person is willing to pay 500,000. Will you
3 offer more because if you don't, we will give
4 it to this person.

5 So what I'm trying to say is they
6 do it both for governments, foreign
7 governments, but some of those operatives,
8 they also -- they offer it in open market, and
9 they have -- they have individuals on their
10 payroll on almost every major nuclear facility
11 in the United States. RAND Corporation and
12 various -- in Midwest, various Air Force labs
13 that develop certain weapons technology, which
14 I am not very familiar with the technology
15 itself.

16 Q When you refer to the or when the
17 article refers to the paid, high ranking
18 American officials, can you identify who they
19 are?

20 A That person has been identified by
21 others.

22 Q Okay.

1 A And he has been identified as Mr.
2 Marc Grossman, who used to work for the State
3 Department.

4 Q Right, and Mr. Grossman, I think,
5 was also in your gallery, correct?

6 A Yes.

7 Q And I read somewhere that Mr.
8 Grossman had some relationships with a Turkish
9 organization, Turkish diplomats here in the
10 United States.

11 A Yes. He had very, very close
12 relationship with not only Turkish diplomatic
13 communities and entities, but business and
14 also some of these criminal layer operatives
15 that I told you about. Currently, that he's
16 nor working; he actually is working for a
17 Turkish company called Ihals Holding.

18 Q Okay. Now, was Mr. Grossman the
19 ambassador to Turkey at some point?

20 A Yes.

21 Q Okay, and then what was his
22 position at the State Department, if you

1 recall?

2 A He had several different
3 positions. I believe in 1999 or 2000, was
4 European Affairs. That dealt a lot with NATO,
5 and afterwards during early bush
6 administration's stage, he was the second or
7 the third highest person in the State
8 Department. I'm not sure about the title.

9 Q Okay, and during that time -- I'm
10 sorry -- during that time when he was the
11 second or third highest ranking person in
12 State, I've read somewhere that you've alleged
13 that he actually warned the Turkish Embassy
14 about a CIA front company that had been set up
15 to stop proliferation of nuclear weapons.

16 A That would be summer 2001.
17 Whatever title he held at that point, he, Mr.
18 Grossman, informed a certain Turkish
19 diplomatic entity who was also an independent
20 operative of a company called Brewster
21 Jennings because Brewster Jennings was
22 frequenting the American Turkish Council as a

1 consulting or analyst firm, and there were
2 certain nuclear related operatives who wanted
3 to hire Brewster Jennings and have it pose as
4 a front company.

5 So there were talks between those
6 Turkish operatives and Brewster Jennings, and
7 Mr. Grossman wanted those people to be warned
8 that Brewster Jennings was a government front,
9 front for government, and it was a front. It
10 was not a company for the front for
11 government, U.S. government, and for those
12 Turkish individuals to be told to stay away
13 from Brewster Jennings.

14 But the person who received that
15 information, the Turkish diplomatic but also
16 operative, actually contacted the Pakistani
17 military attache and discussed with the person
18 who was there about this fact and also told
19 them, warned them to stay away from Brewster
20 Jennings.

21 Q And now was this one of the
22 allegations or one of the concerns that you

1 brought to the attention of anybody at any
2 point?

3 A You mean when I was working for
4 the FBI --

5 Q Yes.

6 A -- and I blew the whistle inside
7 the FBI?

8 Q Right.

9 A No, I didn't do it inside the FBI
10 because at that point I didn't know they were
11 covering up this information. Only after I
12 was fired and the State Secrets Privilege was
13 invoked, and knowing what I knew, I went to
14 Congress and discussed it with certain people
15 in Congress. I brought it up with the
16 Inspector General's Office inside during a
17 meeting, and at that point will provide them
18 the details in terms of dates and who were
19 those targets, which I can't provide right
20 now, the direct targets.

21 Q And when you say "the Inspector
22 General's Office," do you mean a DOJ Inspector

1 General?

2 A Correct. I'm sorry. Glenn
3 Fine's, under Glenn Fine's office.

4 Q And why would Mr. Grossman, if you
5 know, warn the Turkish government and other
6 people not to deal with this CIA front?

7 A There were various relationships
8 and various activities Mr. Grossman was
9 engaged with these individuals, and I don't
10 know which reasons was the top reason for him
11 to do it. Some of them were the monetary
12 relationship, but others dated back to
13 operations that he was leading while he was an
14 ambassador in -- U.S. ambassador in Ankara, in
15 Turkey, until 1997, and some of these
16 operatives dealt with him, and they were doing
17 certain operations in Central Asia for him.

18 I don't know who he was working
19 for, Mr. Grossman, at the time for his
20 operations.

21 It's hard for me to tell. He was
22 involved in so many different things, and I

1 don't know which one constitutes the biggest
2 reason he was providing this.

3 Q Just going back to the Israeli,
4 we've talked mostly about the Turkish
5 organizations.

6 A Yes.

7 Q Turkish government. Are you aware
8 of the Israeli government or Israeli
9 organizations influencing members of Congress
10 as well?

11 A Not directly, not directly.

12 Q Indirectly?

13 A Indirectly, based on how they
14 work, some of the largest Israeli lobby groups
15 with the entities such as ATC and also the
16 Turkish diplomatic community and how they
17 actually trained and make it possible for the
18 Turkish lobby and these entities to do it.
19 they had training period in '96 and '98 from
20 individuals that were sent to them from both
21 APAC and JINSA, both the lobbying, but also on
22 covering the money track, covering up the

1 money track.

2 Q One of the other entries on your
3 Wikipedia entry indicates that you had accused
4 Mr. Hastert and other, quote, high ranking
5 members of U.S. government of -- let me make
6 sure I'm reading this correctly.

7 The entry says, "Edmonds also
8 accuses Dennis Hastert of taking bribes." I
9 think we've talked about that; is that
10 correct?

11 A Yes.

12 Q And then it says, "And high
13 ranking members of the U.S. government of
14 selling nuclear secrets to Turkey and
15 Pakistan."

16 Did you allege that high ranking
17 members in the U.S. government had sold
18 nuclear secrets to Turkey and Pakistan?

19 A They were involved in operations
20 that were obtaining illegally U.S. weapons and
21 nuclear related technology and sell it to
22 foreign governments and also foreign

1 independent operatives.

2 Q Now, one of the other entries
3 indicates, it says 911 For Knowledge, and I'll
4 just read it. It says, "She claims that the
5 FBI received information in April 2001 from a
6 reliable Iranian intelligence asset that Osama
7 bin Ladin was planning attacks on four to five
8 cities with planes. Some of the people were
9 already in the country, and the attacks would
10 happen in a few months."

11 Did you -- did you make that
12 claim?

13 A I took the language specialist,
14 Farsi speaking language specialist, senior
15 language specialist from the Iranian Division,
16 Farsi Division, FBI, Washington field office,
17 who worked right next to me, to the 9/11
18 Commission and Inspector General's Office, and
19 he testified on this.

20 He informed me and he showed me
21 this translator Bekru (phonetic) Sharsahr, and
22 there are documents out there that he went to

1 the Inspector General's Office. He gave them
2 the documents, the translated documents on the
3 Iranians.

4 I was not part of that
5 translation. I was not involved. After I
6 left the FBI because I was witness to that
7 department, what they had obtained, I just
8 facilitated Mr. Sharshar's meeting with 9/11
9 Commission and also with the Glenn Fine,
10 Department of Justice Inspector General's
11 Office, and I put him in touch with the
12 members of media. But that's my only
13 involvement with that Iranian case.

14 Q Do you believe that that's why the
15 9/11 -- the families of the 9/11 victims
16 wanted to get your testimony in connection
17 with their case?

18 A I am not sure because as far as I
19 knew, it had to do with the government of
20 Saudi Arabia and the Saudi Arabian financial
21 institutions. I was not told anything about
22 Iranian case.

1 Q We've talked about some members of
2 Congress having connections with the Turkish
3 government or Turkish organizations. Are
4 there others that you're aware of other than
5 the ones we've discussed already?

6 A Congressional members?

7 Q Congressional members.

8 A Yes.

9 Q Can you identify some of them?

10 A Their pictures are on the -- I
11 have pictures included in my Website, and they
12 can be identified. There's several there
13 outside the ones you named.

14 Q I just -- I looked at the Website
15 but didn't recognize --

16 A Okay.

17 Q -- some of them. So would you be
18 able to tell me who the other pictures are?

19 A Others have been -- they're all
20 identified as public information.

21 Q Yes.

22 A Tom Lantos is one of them.

1 Q All right.

2 A I believe he passed away, and Tom
3 Lantos' office would be not only with the
4 bribe, but also in disclosing highest level
5 protected U.S. intelligence and weapons
6 technology information both to Israel and to
7 Turkey. His office was also involved with
8 that. It was not only bribery, but it was
9 other very serious criminal conduct.

10 Roy Blunt is there. There have
11 been individuals with a question mark there.
12 The reason there's a question mark is I lacked
13 -- I was terminated by April 2002, but this
14 particular Congresswoman -- the Turkish --
15 these Turkish organizations and operatives, if
16 they can't do it by money, they do by
17 blackmail. So they collect information on
18 sexual lives and other information like that,
19 and with this particular Congresswoman, it
20 being 2000 until I left, they -- this
21 individual, this Congresswoman's married with
22 children, grown children, but she is bisexual.

1 So they have sent Turkish female agents, and
2 that Turkish female agents work for Turkish
3 government, and have sexual relationship with
4 this Congresswoman in her townhouse actually
5 in this area, and the entire episodes of their
6 sexual conduct was being filmed because the
7 entire house, this Congressional woman's house
8 was bugged. So they have all that documented
9 to be used for certain things that they wanted
10 to request when I left. So I don't know
11 whether she -- that Congresswoman complied and
12 gave. That's why I couldn't use her name
13 because I don't -- I meant her face because I
14 don't know if she did anything illegal
15 afterwards.

16 But she was -- there are things;
17 information was being collected for blackmail
18 purposes, and her lesbian relationship, and
19 they, the Turkish entities, wanted both
20 congressional related favoritism from her, but
21 also her husband was in a high position in the
22 area in the state she was elected from, and

1 these Turkish entities ran certain illegal
2 operations, and they wanted her husband's
3 help. But I don't know if she provided them
4 with those. I left. I was terminated.

5 Q And can you tell me how you know
6 all that, everything you just told me?

7 A I can't discuss the intelligence
8 gathering method by the FBI, but in general
9 terms, when foreign targets among themselves
10 discuss how they were going to achieve certain
11 goals, objectives, and if those communications
12 are collected and recorded, not only do you
13 have that communications, but in some cases
14 they involved field office surveillance team
15 to see that actually they completed.

16 For example, if they say --
17 somebody says at five o'clock they're going to
18 bug his house, the surveillance team would go
19 out and see that he had (unintelligible). So
20 there were various ways that things were
21 collected.

22 Q All right. So just to make sure I

1 understand this, the Turkish entities were at
2 least preparing to blackmail this
3 Congresswoman.

4 A Correct.

5 Q And is this Congresswoman still a
6 sitting member of Congress?

7 A Yes.

8 Q And why, if you know, would they
9 want to blackmail this Congresswoman?

10 A I don't know what reasons they
11 had, why they just didn't do money. They
12 needed -- I was trained as a language
13 specialist by my agent for -- to find personal
14 information, and one of the things that we was
15 taught in the FBI -- everyone was taught in
16 the counterintelligence -- that the target
17 U.S. persons, whether they are in Congress or
18 executive branch or whatever, first go by
19 foreign entities to what they refer to as
20 hooking period, and it was very common; it's
21 a very common way of trying to find
22 vulnerability, and that is sexual, financial,

1 any other kinds of greeds, and it was -- it
2 was done a lot, was being done a lot, and in
3 some cases certain people from Pentagon would
4 send a list of individuals with access to
5 sensitive data, whether weapons technology or
6 nuclear technology, and this information would
7 include all their sexual preference, how much
8 they owed on their homes, if they have
9 gambling issues, and the State Department,
10 high level State Department person would
11 provide it to these foreign operatives, and
12 those foreign operatives then would go and
13 hook those Pentagon people, whether they were
14 at RAND or some other Air Force base.

15 And then the hooking period would
16 take some times. Sometimes it takes months,
17 sometimes one year. They would ask for small
18 favor, but eventually after they reviewed the
19 targets that the U.S. person -- some small
20 favor, then they would go blackmail and that
21 person would give them everything, nuclear
22 related information, weapons related

1 information. It always worked for them. So
2 it was not always money.

3 Q If you know, what was it that
4 these Turkish entities wanted from this
5 Congresswoman?

6 A I know for sure that Armenian
7 genocide was one, but also where she came
8 from, that city or the district where she came
9 from is where certain Turkish operatives,
10 lobby groups run illegal businesses for fund
11 raising for themselves to generate money, and
12 for laundering that money they needed her
13 influence in that district where she is from
14 and also her husband because he husband was
15 also involved, had some high level position,
16 not an elected person, with where she came
17 from, and they had another Representative who
18 was making it possible, but supposedly she at
19 that point was kind of -- was an obstacle.
20 That's all I know.

21 Q In your experience, I mean, was
22 this hooking technique used with other members

1 of Congress by Turkish entities?

2 A Well, when I worked for the FBI, I
3 work on operations that were not only current,
4 but specific period of 1996 till 2000, 2001,
5 December, 2003 January. So there were a lot
6 of things that certain field office had
7 provided me to go over, and some of that I
8 didn't complete, but one example would be with
9 regard to Mr. Hastert. For example, he used
10 the townhouse that was not his residence for
11 certain not very morally accepted activities.

12 Now, whether that was being used
13 as blackmail I don't know, but the fact that
14 foreign entities knew about this, in fact,
15 they sometimes participated in some of those
16 not maybe morally well activities in that
17 particular townhouse that was supposed to be
18 an office, not a house, residence at certain
19 hours, certain days, evenings of the week.

20 So I can't say if that was used as
21 blackmail or not, but certain activities they
22 would share. They were known.

1 Q With respect to the Congresswoman
2 who they were -- you don't know what happened
3 ultimately because you left, right?

4 A Correct.

5 Q Or you were terminated.

6 A Correct.

7 Q But with respect to that
8 Congresswoman you said one of the things that
9 they wanted was you said Armenian genocide.
10 I assume you were referring to the fact they
11 wanted her support --

12 A Yes.

13 Q -- to oppose the Armenian genocide
14 resolution.

15 A Yes, and she was not leaning that
16 way during that stage, until this hooking
17 start.

18 Q And does it surprise you that they
19 would go to those lengths to gain her
20 opposition to such a resolution?

21 A Not at all.

22 Q Why not?

1 A I don't know what their reason is,
2 but they are going to this extent. I mean,
3 they may have -- I can only guess what their
4 reasons are, but I think they would do
5 anything. It's a very important issue, and
6 whether it's money, whether sexual blackmail,
7 anything they would do to not let this happen
8 or get the support so it wouldn't happen.

9 Q Are you aware of -- other than the
10 people that we've talked about, and I want to
11 come back to Roy Blunt in a minute, but aside
12 from the people we've talked about, are you
13 aware of other current sitting members of
14 Congress who you believe have been given money
15 by the Turkish lobby, Turkish government to
16 oppose the Armenian genocide resolution?

17 MR. FEIN: Objection.
18 Speculation.

19 MR. MARINO: You can answer.

20 THE WITNESS: The pictures are
21 there, and I just talked about that
22 Congressional woman with the question mark

1 because I don't know whether she complied with
2 their -- but those are everything that --
3 those people are all there, that Website
4 pictures.

5 BY MR. MARINO:

6 Q Just before I leave this subject,
7 in your -- when we talk about the Armenian
8 genocide, can you describe what your
9 understanding of that is?

10 A In terms of historically?

11 Q Historically what it is.

12 A It's the genocide that the -- that
13 was committed in Turkey against Armenians, and
14 there -- I have read certain documents,
15 historical documents in the past because this
16 issue I have been aware of for a long time.
17 Everybody in Turkey, they kind of know but
18 they can't admit they know, and it's basically
19 what was available in Turkey was very limited.
20 So my knowledge would be just very, very
21 limited knowledge of what occurred.

22 Q All right. So just based upon,

1 you know, your background, your experience, in
2 your opinion is the Armenian genocide
3 something that's generally accepted as an
4 historical fact?

5 A In Turkey?

6 Q Yeah.

7 A In Turkey, no. I mean, in Turkey
8 nobody can even say they think about it.

9 Q What about elsewhere?

10 A In other countries like --

11 Q Outside of Turkey.

12 A -- outside Turkey?

13 Q Yeah.

14 A Yes. AT least in the circles that
15 I've been it is seen as something that is --
16 that is accepted and that is known as one of
17 those historical events that have taken place.

18 Q Like the Holocaust in World War
19 II, something that people generally regard --

20 A Correct.

21 Q -- as something that happened.

22 Are you aware of anyone and

1 serious scholars, serious people who dispute
2 that those genocides took place?

3 A Throughout the years, because I
4 used to be on the E-mail list of certain
5 student associations that have international
6 students, so I would get from the Turkish
7 parts of those communities E-mails from this
8 professor or that from Turkey visiting to give
9 that lecture, but I don't even remember their
10 names of those people.

11 Is that the question? Did that
12 answer the question?

13 Q Well, I gather from what you are
14 saying, that you would get E-mails possibly
15 from Turkish organizations --

16 A I did.

17 Q -- people where they would dispute
18 that the Armenian genocide took place.

19 A Absolutely.

20 Q Okay. Outside of that group, that
21 cultural group, if you will, are you aware of
22 other objective scholars who dispute that the

1 genocide took place?

2 A I'm not.

3 Q Why is Roy Blunt in your gallery?

4 A One of the individuals who was the
5 recipient of both legally and illegally raised
6 donations, campaign donations from foreign
7 entities.

8 Q And what foreign entities?

9 A The ones that I'm aware of,
10 Turkish entities. It's just like a network
11 because those people, they worked together,
12 and I don't have expertise in PAC, but a lot
13 of -- there are so many ways that these PAC
14 things can be not very legally distributed
15 from one person's, let's say, Mr. Hastert's
16 campaign to that individual or let's say it's
17 a foreign registered lobbyist, like Livingston
18 can get foreign money, but then clean it and
19 then give it to him. It's just so many ways.
20 it's a very complicated maze-like network on
21 how they get this money cleared and into
22 people, into people's pocket and also their

1 campaigns.

2 Q Are you familiar with some of
3 those PACs?

4 A No, not really.

5 Q Have you ever heard of the Turkish
6 Coalition, USA PAC?

7 A Yeah.

8 Q So, I mean, you're aware that the
9 PACs exist, but you wouldn't be able to
10 identify any of them?

11 A Correct, not by names, correct.

12 Q Now, are you -- has it come to
13 your attention that some members of Congress
14 once they've left Congress like Dennis Hastert
15 engaged in lobbying for the Turkish
16 government?

17 A Dennis Hastert is known publicly.
18 Stephen Solarz is known publicly. He used to
19 be a Congressman, and then he became lobbyist
20 as soon as he left both for Israel and Turkey.
21 Bob Livingston, he within a year after he left
22 Congress, he became lobbyist for the

1 government of Turkey, and he is registered
2 under Foreign Agent's Registration Act.

3 But then there are people who work
4 for these lobbying firms who are not the top,
5 but they have received their share while they
6 were working, whether they are in Pentagon.
7 One person was Defense Intelligence Agency
8 person, Dana Bauer, and now she works for Bob
9 Livingston, but this individual, Ms. Bauer,
10 did a lot of favors and illegal favors to --
11 for government of Turkey and others, and then
12 was hired by Livingston and put on a big
13 salary to represent Turkish government.

14 So it's not only top tier of the
15 lobbying firm, but then the people who work
16 for them later and the various layers of those
17 people.

18 Q How about Richard Gephardt? You
19 know, who he is, right?

20 A Yes, I do.

21 Q And do you have any information
22 about whether or not he took money from

1 Turkish organizations?

2 A No, I just have (unintelligible)
3 information based on what I read that he
4 joined the lobby firm for -- that represents
5 Turkey, the lobby that Mr. Hastert got hired,
6 but I don't have any information.

7 Q For the firm called DLA Piper?

8 A Yes.

9 Q Law firm. Are you aware of them
10 lobbying for the Turkish government?

11 A Yes.

12 Q Let me give you a hypothetical and
13 just get your understanding of what might be
14 going on because it's particularly relevant to
15 our case.

16 You have a hypothetical
17 Congresswoman from State X. Her district has
18 no Turkish population to speak of or Armenian
19 population to speak of. She's the largest
20 recipient of Turkish PAC money in the 2008
21 election cycle. All right?

22 She meets with Livingston and

1 Rogers or Livingston Group when they're
2 escorting members of the Turkish parliament to
3 a reception. She receives fact sheets from
4 the Livingston Group talking about Turkish
5 relations; goes to luncheons in honor of the
6 Turkish Foreign Minister, and she opposes
7 Armenian genocide resolution and, in fact,
8 refuses to even recognize the genocide as a
9 historical fact.

10 What's your sense? What does it
11 tell you is going on there in --

12 MR. FEIN: Object. There's no
13 showing at all that she's got any expertise.
14 It's speculation here. He's asking purely for
15 an opinion. It's totally irrelevant and
16 objectionable.

17 THE WITNESS: Based on several
18 that I personally know about in terms of how
19 they conduct and how they behave, those
20 elected officials who are serving the foreign
21 government's interest, I would say that's
22 modus operandi that you describe. It's a

1 classic fit of how individuals who happen to
2 owe their position and favors to a foreign
3 government, in this particular case Turkey,
4 behave at and the kinds of people they
5 associate with. That modus operandi
6 classically matches of the individuals I know
7 who were serving Turkish government's and
8 other Turkish entities' interest.

9 BY MR. MARINO:

10 Q And your view, based on what you
11 know, would it be a reasonable statement to
12 say that that Congresswoman is taking money
13 from Turkish interest in part for denying the
14 existence of the Armenian genocide?

15 MR. FEIN: Objection. Pure
16 speculation?

17 THE WITNESS: Say based on my
18 knowledge, my experience, and what I know,
19 that money -- those Turkish entities' lobby
20 organization will not give a penny to anyone
21 unless they have a prior pact with that
22 person. This is what you're going to do for

1 us, and that has been the case at least up
2 till 2002.

3 BY MR. MARINO:

4 Q On your blog, one of the things
5 that you say, you're referring to your
6 lawsuit, I think, but you say, "My case also
7 involves espionage activities by several high
8 level U.S. officials both elected and
9 appointed."

10 Have we already talked about for
11 the most part what you were referring to
12 there?

13 A Some of it.

14 Q What have we not talked about that
15 you're referring to in that portion of your
16 blog?

17 MR. KOHN: Do you want to discuss
18 it off the record?

19 THE WITNESS: Sure.

20 MR. MARINO: Do you want to take a
21 break off the record?

22 (Whereupon, the foregoing matter

1 went off the record at 12:16 p.m.
2 and went back on the record at
3 12:27 p.m.)

4 MR. MARINO: We had a pending
5 question and during the break discussed it
6 with counsel, and we agreed to withdraw that
7 question basically because it was too broad
8 and so forth, and it's probably not necessary.

9 BY MR. MARINO:

10 Q Let me ask you a different
11 question, Ms. Edmonds. I understand that you
12 executed an affidavit or a declaration
13 actually in this case on August 5, 2009. I'm
14 happy to show it to you. I've only got one
15 copy, but I'm happy to show it to you if you'd
16 like to see, but I just have some questions
17 about some of the things you said in the
18 declaration.

19 In Paragraph 3 of your
20 declaration, you say, "I also obtained
21 evidence that the government of Turkey had
22 engaged in practices and policies that were

1 inimical to American interests and had, in
2 fact, resulted in both the direct and indirect
3 loss of American lives."

4 Do you recall saying that in your
5 declaration?

6 A Yes.

7 Q Can you tell me what practices and
8 policies that you were referring to that were
9 inimical to American interests?

10 A There's several. One is practices
11 and operations implemented from mid-1990s at
12 least until towards end of 2001 in Central
13 Asia and Caucasus, and these operations and
14 practices included Islamization of certain
15 segments of those Turkic nations, Uzbekistan,
16 Turkmenistan, Tajikistan. There are so many
17 of them in that -- in that area, and setting
18 up madrasahs and bringing in, helping bringing
19 -- at the time they were not referred to as
20 al-Qaeda until 2001, September 11th. They
21 were referred to as mujahideens from
22 Afghanistan and Pakistan into Central Asia,

1 then to Turkey to give them passports, and
2 then funnel them in 1997, 1998 to certain
3 Eastern European countries and the Balkans.

4 And also -- and it's very broad I
5 can go on for a long time about what practices
6 and why they were -- they were against the
7 security and the interests of the Americans
8 and the lives.

9 Q Okay. Well, I don't want to
10 burden you too much, but I would like as
11 complete an answer as you can give us in terms
12 of what you were referring to.

13 A Those operations when until -- at
14 least until September 2001, and again, for
15 those operations, they corroborated and worked
16 with certain U.S. persons who were involved in
17 these operations.

18 The other, the obtaining,
19 illegally obtaining and selling U.S. military
20 and military technology and that includes
21 weapons and nuclears, and even from foreign
22 policy related secret or high -- top secret

1 information, and not only for Turkey, but
2 passing this information to what they refer to
3 as highest bidders and whoever bid highest,
4 whether these people were nation-states or
5 they were just individuals that they were
6 pursuing under counterterrorism after
7 September 11. That would be another example
8 of activities that they were involved that
9 were against the security and the interest of
10 the Americans with cost in terms of lives.

11 Q Well, that was going to be my next
12 question, is how do you connect what the
13 Turkish government was doing to the direct and
14 indirect loss of American lives.

15 A One example of this would be with
16 Brewster Jennings, for example, just selling
17 that information and giving that information
18 out in the hands of those foreign entities,
19 including Pakistan. One of the things that
20 the CIA was asked for right away, to do damage
21 assessment, and one of the things that came
22 out of it was the damage assessment included

1 damage to asset both in terms of
2 effectiveness, which was neutralized and that
3 Brewster Jennings' front company for CIA have
4 to be immediately absolved that summer after
5 this information was obtained, but also they
6 were accessing U.S. people who were
7 compromised because of that by -- within these
8 foreign governments. That's another.

9 And the third one that I started
10 talking about were helping these individuals
11 from Azerbaijan, the Turkey entities that
12 served the mujahideen groups starting from
13 1995, 1996. They were given Turkish
14 passports. In some cases they were given
15 Azerbaijani passports, and they -- Turkey
16 played a very active and important role in
17 taking these people and moving them into
18 Europe and some of those people actually ended
19 up in the United States.

20 Q And I think you indicated earlier
21 that the Turkish government to your knowledge
22 was provided support to what was once called

1 the mujahideen.

2 A Correct.

3 Q It's now called al-Qaeda.

4 A Right.

5 Q And has it generally been publicly
6 reported that al-Qaeda was behind the 9/11
7 attacks?

8 A Correct.

9 Q And that cost American lives?

10 A Correct.

11 Q How else has, to your knowledge,
12 the mujahideen or al-Qaeda that Turkey was
13 supporting cost American lives?

14 A September 11 and the other
15 category I talked about was the intelligence
16 and identifying assets or the front companies.
17 The third category that involved narcotics
18 activities and that was, at least until I
19 left, these Turkish people, and some of them
20 are directly connected to Turkish intelligence
21 and Turkish military in the United States,
22 they played a very significant role in

1 bringing in heroin from source from
2 Afghanistan to Turkey, but from Turkey into
3 both United States, but also directly to
4 Belgium, large quantity, very, very large
5 quantity of heroin.

6 Q All right. So if I were to say
7 that -- if I were a Congress person and I'm
8 taking money from the Turkish government
9 either directly or indirectly, would it be a
10 fair statement that I'm taking money from a
11 government that has engaged in policies and
12 practices that cost American lives?

13 A Correct.

14 Q Are you familiar with a person
15 named Fetullah Gulan, G-u-l-a-n?

16 A Yes.

17 Q Can you tell us who that is?

18 A My information is mainly about his
19 activities and issues that were, again, done
20 from late 1990s until I left, and then after
21 that it will be known activities here in the
22 United States. He shortly -- he was the

1 religious activist figure in Turkey, and he
2 landed on Turkish government's wanted list and
3 was going to be persecuted for wanting to
4 throw Turkish secular government -- replace it
5 with Islamic shariah kind of type of
6 government.

7 And when he was wanted in Turkey
8 for that and he was going to go to jail, he
9 actually got on the plane and came to the
10 United States, and he was given immediately
11 visa to stay in the United States, and he has
12 been in the United States until now as far as
13 I know.

14 He has since established more than
15 300 madrasahs in Central Asia and what he
16 calls universities that have a front that is
17 called Moderate Islam, but he is closely
18 involved in training mujahideen-like militia
19 Islam who are brought from Pakistan and
20 Afghanistan into Central Asia where his
21 madrasahs operate, and his organization's
22 network is estimated to be around \$25

1 billion.

2 He has opened several Islamic
3 universities in the United States. As I said
4 it's being promoted under Moderate Islam. It
5 is supported by certain U.S. authorities here
6 because of the operations in Central Asia, but
7 what they have been doing since late 1990s is
8 actually radical Islam and militizing
9 (phonetic) these very, very young, from the
10 age 14, 15, by commandoes they use, and this
11 is both commandoes from Turkish military,
12 commandoes from Pakistani ISI in Central Asia
13 and Azerbaijan, and after that they bring them
14 to Turkey, and from Turkey they send them
15 through Europe, to European and elsewhere.

16 Up until 1999, the Turkish
17 government, also paramilitary units in Central
18 Asia, they operated under the groups that call
19 themselves Gray Wolves, ultra-nationalists,
20 and their method was, you know, assassination
21 of certain leaders in the Central Asian
22 countries, and militizing, but not through

1 Islam.

2 But after this scandal that took
3 place in Turkey, Susurluk scandal, they were
4 no longer supported by certain segments in the
5 United States, and instead some of our people
6 involved in foreign policy, they supported the
7 Islamic movements of Gulan in the Central
8 Asian countries in order to counter Russia as
9 far as the energy sources are concerned in
10 those countries.

11 Q How is it, if you know, or how is
12 it that Gulan is allowed to be in the United
13 States?

14 Let me ask a different question.

15 A Okay.

16 Q I'm sorry. Is that an individual
17 based on what you've told me that you would be
18 -- that you would consider a threat to U.S.
19 interests?

20 A One hundred percent, absolutely.

21 Q And if you know, how is it that
22 he's allowed to be in the United States?

1 A Because part of what he has in
2 terms of the deal with certain segments in the
3 United States is furthering the interests of
4 the people who are interested in the energy
5 sources in Central Asia, and that is the --
6 whether it's oil or whether it's natural gas,
7 and basically it's a fight.

8 The best way to describe it is
9 Cold War is not over. It's a continuation of
10 Cold War over those nations, and what we did
11 in Afghanistan in early 1980s with mujahideen,
12 we have been joined now in Central Asia by
13 using Islam and extremism and these madrasahs,
14 and Pakistani and Afghani elements to build
15 (unintelligible) and staff in terms of those
16 resources towards certain business interests.

17 Q Did you say that Gulan had set up
18 schools in the United States as well?

19 A Yes.

20 Q Are some of those in Cincinnati,
21 if you know?

22 A I'm not sure. I know of some in

1 Texas. I know one in Virginia, but I don't
2 know. They are multiplying, and they're
3 spreading rapidly. There's Islamic madrasahs
4 or universities everywhere. So I haven't kept
5 track of the locations. I don't know.

6 Q I assume that --well, let me just
7 ask you, and I'm not trying to put you on the
8 spot. If you can't answer, just tell me.

9 Would you be prepared to tell me
10 who the Congresswoman is that we've been
11 talking about?

12 A I would have, and it wouldn't be
13 because of classification I don't believe. I
14 -- if in case this congressional person did
15 not bend under the pressure in case. I just
16 don't want somebody, innocent person's
17 reputation destroyed because I don't know if
18 this person complied with whatever she
19 happened to be blackmailed later. I think
20 I --

21 Q All right. That's fair enough. I
22 take it then from what you've told me that the

1 people you've identified, the people that
2 you've talked about today you're certain
3 about.

4 A Yes.

5 Q And what you've told me today
6 about those people is not based on
7 speculation.

8 A No.

9 MR. MARINO: Can you just give me
10 one moment please?

11 (Pause in proceedings.)

12 BY MR. MARINO:

13 Q Are you familiar with reports that
14 the Turkish nationals were being supported or
15 acting as suicide bombers against U.S. troops
16 overseas?

17 A Not directly.

18 Q Any doubt in your mind that the
19 Turkish government has caused American lives?

20 A No.

21 Q Caused a loss of American lives?

22 A No. And not only American lives.

1 Even in other countries and some innocent
2 Turkish lives, too, but American lives, too,
3 yes.

4 Q Any question in your mind based on
5 everything that you've experienced that the
6 Turkish government has infiltrated members of
7 Congress to get their support against or their
8 opposition to the Armenian genocide
9 resolution?

10 A None whatsoever.

11 Q I've asked you about members of
12 Congress, but I haven't asked you about staff.
13 Are you aware of senior staff for members of
14 Congress who have also been corrupted by the
15 Turkish government?

16 A Absolutely.

17 Q Can you identify them?

18 A The pictures are there.

19 Q Who is Larry Franklin?

20 A He was an analyst working for
21 Pentagon who was indicted on charges of
22 espionage and passing information to, I

1 believe, Israeli lobby ATAC. Active
2 participants in ATC, American Turkish Council
3 around these Turkish operatives.

4 MR. MARINO: Okay. Well, I think
5 that's all I have. I think others may have
6 some questions for you, but I do want to thank
7 you again for your patience and for coming
8 today..

9 MR. FEIN: I have many questions,
10 but I don't know whether you want to take a
11 break yet. I suspect the questions may be at
12 least an hour or two hours. So you need to
13 estimate whether you want to break now or
14 whatever you want to do or whatever counsel
15 wants to do as well.

16 MR. MARINO: Yeah, we'll take a
17 lunch break.

18 MR. FEIN: Do you want to take a
19 break?

20 THE WITNESS: How long for?

21 MR. FEIN: You decide. I'll
22 accommodate whatever you want, and I can talk

1 to counsel here. Whatever you want is fine.

2 MR. MARINO: Well, I think
3 personally I always ask the witness how much
4 time she wants, and then I ask the court
5 reporters because they're captives here. So
6 I always try to -- yeah, why don't we go off
7 the record?

8 (Whereupon, at 12:45 p.m., the
9 deposition was recessed for lunch, to
10 reconvene at 1:30 p.m., the same day.)

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1 MR. FEIN: I guess we're beginning
2 the afternoon session.

3 CROSS EXAMINATION

4 BY MR. FEIN:

5 Q Ms. Edmonds, my name is Mr. Fein,
6 and I'm an attorney who represents Jean
7 Schmidt in her complaint against Mr. Krikorian
8 here before the Ohio Elections Commission.

9 When did you first learn of the
10 complaint that Ms. Schmidt had filed against
11 Mr. Krikorian?

12 A About maybe ten days, two weeks
13 ago, ten days.

14 Q And how did you learn of that?

15 A I either received an E-mail or
16 call from Mr. Krikorian's office, and I was
17 told that there was this lawsuit, that I may
18 be called as a witness.

19 Q And who spoke to you?

20 A I spoke with Mr. Krikorian.

21 Q And what did he ask you to do?

22 A He asked whether I would be

1 available to be deposed if he and his
2 attorneys before the trial they were going to
3 have would want to seek my deposition.

4 Q And what did you respond?

5 A I don't recall exactly, but I said
6 -- I said, well, if I get a subpoena or just
7 let me know what it is, then I will speak with
8 my attorneys.

9 Q Did Mr. Krikorian explain to you
10 what the complaint was about?

11 A No. He told me there was public
12 information available and just in general he
13 said that there was a complaint brought
14 against him in the -- with the Ohio State
15 Election Commission, and I just went and
16 briefly read a couple of articles that were
17 out there on the case, that the fact that this
18 case existed to verify it.

19 Q Did you actually read the
20 complaint that had been filed before the Ohio
21 Elections Commission?

22 A Do you mean the actual legal

1 complaint?

2 Q Yes.

3 A No.

4 Q Have you read it at present? When
5 you came here today had you read the actual
6 legal complaint?

7 A No.

8 Q So you don't know what's actually
9 in the complaint; is that correct?

10 A Just some major points that had
11 been public on Websites and also on post.

12 Q So you received -- Mr. Krikorian
13 called you about ten days ago and your
14 response was that you would be willing to be
15 deposed or what exactly did you tell him?

16 MR. KOHN: Objection.

17 MR. FEIN: I apologize.

18 MR. KOHN: Asked and answered.

19 MR. FEIN: Well, I apologize.

20 BY MR. FEIN:

21 Q What is it -- I want a
22 clarification. When he asked you would you be

1 deposed, did you say yes?

2 MR. KOHN: Asked and answered.

3 BY MR. FEIN:

4 Q Did anyone inform you before you
5 appeared today that the Ohio Elections
6 Commission had stated it would not enforce the
7 subpoena that had been issued for you to be
8 deposed here?

9 A I read the letter.

10 Q So that you knew that you didn't
11 have to appear here.

12 MR. KOHN: Objection. It calls
13 for a legal conclusion.

14 MR. FEIN: No, I'm sorry. I would
15 like her opinion here. She's testified about
16 States Secrets Privilege. She's testified
17 about what genocide means. Those are all
18 legal questions. She can testify about her
19 subpoena.

20 MR. MARINO: Excuse me. I join in
21 the objection.

22 MR. FEIN: Okay. Go ahead and

1 answer.

2 MR. KOHN: What is the question?

3 MR. FEIN: The question is: did
4 you read and understand that the Ohio
5 Elections Commission had stated that they did
6 not intend to --

7 MR. KOHN: Do you have a copy?

8 MR. FEIN: -- enforce the
9 subpoena?

10 What?

11 I said did you have -- were you
12 under that understanding that the Ohio
13 Elections Commission in the letter had stated
14 to all the attorneys involved in the
15 Department of Justice they did not intend to
16 enforce the subpoena that had been issued for
17 you to be deposed here today.

18 MR. KOHN: Not quite my
19 understanding of the letter.

20 MR. FEIN: I think it speaks for
21 itself.

22 THE WITNESS: I read the letter.

1 BY MR. FEIN:

2 Q So in your view are you here
3 voluntarily?

4 MR. KOHN: Objection. Calls for a
5 legal conclusion.

6 MR. FEIN: I know.

7 BY MR. FEIN:

8 Q Are you here voluntarily? Answer
9 the question. In your view, are you here
10 voluntarily?

11 MR. KOHN: -- is under --

12 BY MR. FEIN:

13 Q Did anyone advise you that you
14 were compelled to be here and you would be in
15 contempt of an outstanding decree issued by a
16 government agency if you were not here?

17 MR. MARINO: Excuse me. May I
18 just make an objection?

19 MR. FEIN: Sure.

20 MR. MARINO: Object based on it
21 calls for a legal conclusion, and now you're
22 asking for attorney-client communications.

1 MR. FEIN: No.

2 MR. KOHN: I agree.

3 MR. FEIN: It's not -- go ahead.

4 MR. KOHN: The witness is not
5 going to answer that question because it's
6 outside the scope of her appearance.

7 BY MR. FEIN:

8 Q Did you discuss what you would be
9 saying here today to anyone before you arrived
10 here at 10:30 or so?

11 A Can you be more specific?

12 Q Yes. Did you talk to somebody
13 about what you would testify to in today's
14 deposition to anybody else? I'm not talking
15 about the substance; just that you did, and
16 identify the people who you spoke about.

17 A I have responded to requests about
18 comments about today as I don't know. There
19 are going to be questions, and I don't know
20 what questions I'm going to be asked, and
21 after it is over and before, my attorneys will
22 be present to make comments.

1 Q Did you talk to Mr. Krikorian
2 about what you would be saying today?

3 A To -- you mean this --

4 Q Mr. Krikorian.

5 A You mean what I'm going to say
6 during deposition today?

7 Q Yes.

8 A No, no.

9 Q Did you talk to anybody else about
10 what you would be saying here today?

11 I'm not talking about the
12 substance. Just a person that you can
13 identify you spoke to about what you would be
14 saying and what questions you might be
15 confronting?

16 A I have --

17 MR. KOHN: Let me just make --
18 excuse me. Let me just make an objection. I
19 assume you're not referring to her own counsel
20 and asking whether she talked to --

21 MR. FEIN: No, I don't want an
22 attorney. I don't want client -- attorney-

1 client privilege.

2 THE WITNESS: I did not know what
3 questions I was going to be asked. So I
4 couldn't talk about my answers.

5 BY MR. FEIN:

6 Q Let's go back to your hiring by
7 the FBI. I think your testimony is it was
8 September 15th, 2001.

9 A Around that time.

10 Q Okay. Now, were you employed
11 prior to your hiring by the FBI?

12 A Yes.

13 Q And where were you employed?

14 A Had my own company with my
15 husband.

16 Q Un-huh, and what was that company
17 involved in? What business?

18 A Technology for retail industry.

19 Q And when was that company formed?

20 A About 1996.

21 Q 1996. Been about five years old
22 company. Where was it -- do you know where it

1 was registered?

2 A I believe Alexandria, Virginia.

3 Q And so what were the -- what were
4 your tasks at that company?

5 A Marketing.

6 Q Marketing.

7 A And day-to-day management of
8 people.

9 Q I'm -- could you be a little more
10 specific? You're saying it's a market -- it's
11 a retail marketing company. Do you offer your
12 services to retailers? Do you actually sell
13 retail items?

14 MR. KOHN: Do you have a relevant
15 question?

16 MR. FEIN: Yes, I do have a
17 relevant. It's her background, knowing before
18 going to the FBI exactly what her background
19 in intelligence was.

20 MR. MARINO: I object. It's
21 outside the scope of the direct examination.

22 THE WITNESS: The position I had

1 involved providing inventory, supply chain
2 management related software and services, IT
3 services for retail chains.

4 BY MR. FEIN:

5 Q All right, and were there any
6 employees of the company or just you and your
7 husband?

8 A No, at that time, I believe he had
9 eight, seven or eight employees.

10 Q So is it fair to say the company
11 was involved in writing some kind of software
12 that would enable retailers to do inventory
13 control?

14 A IT services.

15 Q IT services. Did it have anything
16 at all to do with intelligence collection?

17 A No.

18 Q Did it have anything at all to do
19 with lobbying Congress or campaign finance?

20 A No.

21 Q How old were you when you were
22 hired by the FBI?

1 A Thirty-one.

2 Q Thirty-one years old, and prior to
3 that time, did you consider yourself an
4 intelligence expert?

5 Did you do just as an avocation a
6 lot of reading in intelligence collection and
7 counterintelligence and espionage and how
8 covert operations were run?

9 MR. MARINO: Objection. Compound.

10 THE WITNESS: Both in terms of my
11 education and background and also certain
12 activities that I was involved still while I
13 was in the United States, in Turkey, and
14 basically the kind of thing that you would
15 consider -- today's being considered citizen
16 journalism.

17 BY MR. FEIN:

18 Q Could you be more explicit?
19 What's citizen journalism? I'm not familiar
20 with that concept. If you could, explain that
21 concept to me.

22 A Conducting research and write

1 editorial pieces, whether the political
2 situation in Iran or whether the articles I
3 had written or meetings I have discussed, the
4 journalists -- protection of journalists in
5 Turkey, other human rights, because of the --
6 my involvement with Committee to Protect
7 Journalists, political and civil liberties
8 related issues.

9 Q So how many articles or books had
10 you published when you were hired by the FBI?

11 A I had not published any books.

12 Q Any articles, any newspaper
13 articles, op-eds, magazine articles.

14 A It's hard for me to tell how many
15 of the stuff I had written have been picked up
16 by international press, whether in Turkey or
17 elsewhere. I have to check. I don't know.

18 Q Let me just give you an example.
19 If I write an article, I will submit it and it
20 may be published by the New York Times or the
21 L.A. Times or something like that, and I know
22 because I have an arrangement where you submit

1 articles and they tell you it's going to be
2 published or not.

3 Did you have any such arrangement
4 with any publication?

5 A No, I was doing it just mainly for
6 public. The same thing for my activism with
7 the Committee to Protect Journalists or also
8 working on behalf of sexually abused children
9 in Alexandria with Alexandria courts. I was
10 going -- providing all those services and
11 expertise for free because that was my public
12 work as a volunteer.

13 Q And how many hours of volunteer
14 time would you do for a week would you
15 suggest?

16 MR. KOHN: Can we have a time
17 period?

18 MR. FEIN: The time period when
19 you were working on your -- with your company.
20 I guess it began in '96.

21 THE WITNESS: My company was
22 established in 1992, and I had other real

1 estate related businesses.

2 It depends. During, between '96
3 and '99 for Alexandria Court and sexually
4 abused children I would spend about 15 hours
5 a week working on that case. On researching
6 and writing and reading about political
7 related issues, including journalism, civil
8 liberties, during that period of time it's
9 hard to estimate. I would say in the range of
10 maybe ten hours a week.

11 BY MR. FEIN:

12 Q What was the title of the position
13 that you applied for for employment in the
14 FBI?

15 A Language specialist, contract
16 language specialist for Turkey and another
17 agreement that said contract language
18 specialist for Farsi.

19 Q Were the criteria for that job at
20 all involved any knowledge, expertise in
21 intelligence?

22 A When they advertised and told me

1 about it, no, but upon my hiring --

2 Q That's -- that's a good enough
3 answer. And was that --

4 MR. KOHN: Had you completed your
5 answer?

6 THE WITNESS: No.

7 MR. FEIN: Oh, did you want to --
8 if you -- if you think I've interrupted you,
9 if you want to explain further, you just tell
10 me.

11 THE WITNESS: Sure. The Special
12 Agent, Dennis Sharshar, for Turkish
13 Counterintelligence and Counterterrorism
14 Division, he also had a say in the matter, and
15 he wanted to evaluate my political
16 understanding and understanding of Turkish
17 criminal operations in general, including the
18 ultra nationalist Gray Wolves, before he gave
19 his okay, and we had a session that was during
20 the time when my contract was being approved,
21 and he made recommendations saying, yes, he
22 needed my expertise in the area of Gray

1 Wolves, Turkey, Turkish ultra nationalists.

2 So I don't know how much role it
3 played, his opinion, but that was one of the
4 criteria that he wanted to have for his
5 translator.

6 BY MR. FEIN:

7 Q Was he the one who made the
8 decision to hire you?

9 A I am not sure about how the
10 hierarchy works within the FBI. Was it taken
11 into consideration? I don't know because some
12 of the Headquarters and the Headquarter people
13 that I'm not sure who they were; they --

14 Q So you -- and he -- did you have a
15 separate interview with him in conjunction
16 with your application?

17 A After my application, yes.

18 Q And this is before you were hired,
19 as part of the application process?

20 A No, this was during the time that
21 they were drawing my contract. Because of
22 September 11th terrorist attack, they wanted

1 me to start immediately. So as I was working,
2 they were actually completing my contract. My
3 contract was not completed because they wanted
4 me to start immediately.

5 Q So that when you -- at the time
6 you were hired, you were not -- had not been
7 interviewed by anybody at the FBI. This was
8 just based upon your written application; is
9 that correct? Because there was such an
10 urgency?

11 A Correct. Three years before that
12 it was polygraph test for background check and
13 the filling out application, but I was never
14 interviewed by anyone in the FBI ever.

15 Q And how long did it take after you
16 applied before you were hired?

17 A I don't recall. In the range of
18 not weeks, maybe a week or ten days, but I'm
19 -- I don't recall exactly how long it took.

20 Q And does the FBI have the GS level
21 pay compensation schedule?

22 A As far as I know, they don't have

1 it for contractors. They have it for full-
2 time employees.

3 Q Were you a contract or a full-time
4 employee?

5 A I was a contractor.

6 Q So what were you -- what were the
7 terms of the contract? How much were you
8 paid? What was the length of the contract?
9 What were your obligations?

10 Did you actually show up at the
11 premises or did you work off premises?

12 A No, I showed up the premises
13 and --

14 Q Was it at the J. Edgar Hoover
15 Building?

16 A It was Washington field office,
17 which is only a few blocks from the FBI
18 Headquarters.

19 Q Okay. Let's go -- I'll -- I'll --
20 let's go thought item by item. What was your
21 compensation rate?

22 A I don't recall exactly. It was in

1 the range of 35 to \$40 per hour.

2 Q So they paid you on an hourly
3 basis.

4 A Correct.

5 Q Did they have a minimum or a
6 maximum number of hours you're supposed to
7 work per week?

8 A They asked me to work 40 hours or
9 more because they needed both my expertise in
10 language and also in the active, urgent cases
11 the FBI had, but I could not because I have
12 another job, and I was also preparing for my
13 Master's degree. So I couldn't give them more
14 than 25, 30 hours a week, and they wanted much
15 more, and they kept asking me, and they also
16 gave me the application and asked me to apply
17 for agent position at Quantico because they
18 needed my expertise and language skills, and
19 I got official letters, recommendations,
20 recommending me to Quantico because of my
21 knowledge, expertise, and the language skills.

22 Q Did you actually apply for a full-

1 time position?

2 A No.

3 Q No.

4 A They couldn't pay me enough. I
5 couldn't do that.

6 Q So they offered you 35 to \$40 an
7 hour, and was it up to you or did you have to
8 work a minimum number of hours in order to
9 stay as a contractor?

10 A They told me everything was up to
11 me because they couldn't find someone with my
12 expertise in language skills and the
13 background checks. So anything I could do,
14 even if it was ten hours I could spare, would
15 be great because they wanted me to work for
16 them full time or overtime.

17 Q And was there a time -- was there
18 a term for the contract?

19 A I believe so. I am not sure about
20 the date, whether by the end of that year,
21 because I started in 2001, whether it had to
22 be renewed by January 2002, but there was a

1 time period, correct. I don't remember what
2 it was.

3 Q Had the time period expired and
4 you were renewed in April of 2002 when you
5 were let go?

6 A That may have been the case. It
7 was eight years ago. I don't recall.

8 Q And during the period when you
9 were with the FBI, about how many hours per
10 week did you, in fact, work?

11 A It was not exactly the same way
12 every week because based on my school
13 schedule, based on my family life and work,
14 some weeks I was able to work maybe 30 hours.
15 Some weeks I was able to work about 15 hours.
16 If you were to average it, it would be in the
17 range of 20, 25 hours a week.

18 Q So that would be about half time,
19 and let's assume 40 hour week would be a
20 standard work week for someone who's employed
21 full time. You were somewhat like a half-time
22 employee in terms of hours.

1 MR. KOHN: She was a contract
2 employee.

3 MR. FEIN: I know. Well, I'm a
4 little bit confused when you -- independent
5 contractor may have different rights and legal
6 obligations as an employee who may get pension
7 benefits and all sorts of health insurance.
8 I worked in the Department of Justice for 15
9 years, and contractors would not be entitled
10 to those benefits like an employee was.

11 BY MR. FEIN:

12 Q Were you identified in your
13 contract as an independent contractor or an
14 employee for purposes of these benefits and
15 other what you would call subsidiary
16 remuneration for working?

17 A Independent contractor.

18 Q Do you know how many other
19 independent contractors were working with the
20 FBI about the time you were?

21 A No.

22 MR. KOHN: I presume you're

1 talking in her area.

2 MR. MARINO: Yeah, in -- in --

3 THE WITNESS: Language.

4 MR. MARINO: In the language, the
5 translation area.

6 THE WITNESS: No. I know several.
7 There were more than 200, 300 people in that
8 department, combination of full time and
9 contractors, and my knowledge is limited to
10 the Farsi Department and maybe Turkish
11 Department because things were changing. Some
12 people would start as contractors and wanted
13 to work full time. So I can't give you an
14 exact number.

15 BY MR. FEIN:

16 Q Do you know whether it was
17 customary that other independent contractors
18 work on an average 20, 25 hours a week where
19 you were in the mid-range or did you not know
20 about other independent contract arrangements?

21 A I don't.

22 Q You didn't know?

1 A I didn't know.

2 Q You didn't know about any other
3 kind of arrangement. And tell me exactly what
4 were the work place arrangements for you to
5 perform your work? Did you go to a fixed
6 office at the FBI? Were you given opportunity
7 to choose where you wanted to listen to tapes?
8 How did that work?

9 A I can't give you details because
10 of the area, but it was combination. As far
11 as my main work that I was asked to do because
12 it was top priority outside counterterrorism,
13 it was only Washington field office, and that
14 was where from other field offices they would
15 send information related to Turkish related
16 area and I would translate.

17 But for certain counterterrorism
18 tasks I had to go to Philadelphia or New
19 Jersey to the Special Agents. In some cases
20 I had to interrogate 9/11 detainees that were
21 shackled in rooms who didn't speak English and
22 they spoke either Turkish or Farsi. It was a

1 combination of different tasks.

2 Q So your tasks included not only
3 listening to tapes, but doing interrogation of
4 detainees?

5 A I can't say tapes or not tapes,
6 but in addition to audio, it was written.
7 Also it included live interviews, going to
8 various field offices, and translate
9 interrogation results.

10 Q So let me be clear in my own mind.
11 You would translate an answer, but you
12 wouldn't be the one making up the questions
13 for the detainees or is that inaccurate?

14 A It depended because after
15 September 11th, some of the FBI agents, they
16 didn't know anything, and they were very nice
17 and good to know that they didn't know
18 anything. So they would defer to my expertise
19 to ask the right questions from detainees and
20 some of the immigrants they had rounded up.
21 In some cases there were certain Kurdish
22 individuals, and even the Special Agent in

1 Charge would take me out and say, "What kind
2 of questions do you think needs to be asked?"
3 and I would tell them this and this, and
4 because of the region this person from Turkey
5 had come, it's not a very religious city. So
6 -- or this person seems to be from the area
7 and a family background that is ultra
8 nationalist. So they would ask me to actually
9 draft the questions to trick the detainees and
10 get the right answers.

11 So, yes, in fact the Special
12 Agents in Charge deferred to me to draft
13 questions because they didn't know where
14 Turkey even was.

15 Q Can you give me -- and I don't
16 want to intrude on intelligence sources and
17 methods --

18 A Right.

19 Q -- can you give me an example of a
20 particular question you drafted for a
21 detainee?

22 MR. KOHN: I think that would be -

1 -

2 THE WITNESS: I can't make it up.

3 MR. FEIN: Withdraw the question.

4 BY MR. FEIN:

5 Q Now, I think that in your
6 testimony this morning you stated that the
7 allegations that you had made internally to
8 the FBI about various amounts of wrongdoing
9 had all been substantiated by the Inspector
10 General's report. Is that your recollection
11 and statement, that your allegations were all
12 substantiated by the Inspector General?

13 A No, I said the Inspector General's
14 report is public and you can defer to it, and
15 I believe I was asked about Dickerson
16 espionage case, and on that particular case I
17 said the report substantiates and states that
18 those allegations were supported by other
19 witnesses and documents, or some language to
20 that effect.

21 Q Now, were there other allegations
22 that you made that the OIG said were not

1 substantiated?

2 MR. MARINO: Objection.

3 Foundation. You haven't established that the
4 OIG looked with the other allegations.

5 BY MR. FEIN:

6 Q To your knowledge, did the OIG
7 look at allegations, for example, relating to
8 misuse of travel?

9 A Yes.

10 Q It did look at those, and do you
11 recall whether the OIG substantiated your
12 allegations on that score?

13 A I don't recall. It may have been
14 one of those that it was not conclusive or
15 they didn't have other witnesses. I'm not
16 sure. It's been a while since I read the
17 report, but we can bring the report and I can
18 go over that.

19 Q Would it surprise you if I gave
20 you the report and it said that it was unable
21 to substantiate your travel allegations?

22 A Not at all.

1 MR. KOHN: I don't think she knows
2 you well enough to be surprised.

3 BY MR. FEIN:

4 Q After April when you were
5 discharged or you weren't renewed by the FBI,
6 what then did you turn to for employment or
7 work or what then occupied your time?

8 A What period of time you're
9 referring to?

10 Q Well, why don't we -- let's take
11 it year by year and maybe we can abbreviate it
12 if there's some years that are the same. So
13 from April in 2002 to the end of 2002, what
14 were you doing after you left the FBI?

15 A Oh, I had just begun my case with
16 -- my court case with my attorneys. So most
17 of my time was concentrated on my case, legal
18 case, in court and the necessary research
19 related to my case.

20 Q Okay. So you were working on
21 challenging the legality of your discharge; is
22 that correct?

1 A Yes.

2 Q And what about 2002 to 2003?

3 A More research and contacting other
4 FBI and CIA and Department of Defense
5 witnesses who could have known about these
6 cases or worked in the relevant areas, and my
7 legal case, and starting my organization
8 around that time, which is a nonprofit
9 organization.

10 Q Okay. What's the name of the
11 organization?

12 A National Security Whistleblowers
13 Coalition.

14 Q And is that incorporated as a
15 501(c)(3) organization or what's the
16 corporate --

17 A It's 501(c)(4).

18 Q (c)(4) organization, and that was
19 incorporated in 2003?

20 A I believe it was 2000 -- end of
21 2004.

22 Q End of 2004?

1 A Correct.

2 Q And what is the mission of that
3 particular organization?

4 A It works with intelligence and law
5 enforcement related individuals who have been
6 wrongly treated or retaliated against for
7 whistleblowing, in general, and helping them
8 with their cases, legal cases, referring them
9 to attorneys, analyzing their cases, their
10 court cases, their filings, and also
11 coordinating with the media about any release
12 or statements on their cases' development, and
13 also legislation activities with Congress.

14 Q Who are the officers of that
15 organization?

16 A It's myself.

17 Q What's your title?

18 A I'm the founder and director, and
19 we have -- I have two senior advisors. One of
20 them is Professor William Weaver, who used to
21 work for NSA, National Security Agency, and
22 now he's a senior professor at the University

1 of Texas.

2 Q And who is the other senior
3 advisor?

4 A Steve Elson. He was the top
5 ranking Federal Aviation, FAA Red Team member
6 on terrorism related operations.

7 Q So you are the director and then
8 you have two senior advisors. Is there a
9 board of directors?

10 A Yes, and the board of directors is
11 myself and Steven Elson and William Weaver.

12 Q Any others?

13 A No, not that --

14 Q Are there any other officers, a
15 treasurer, secretary, anything like that?

16 A That would be me.

17 Q That's all you?

18 A Yes.

19 Q And is this a stock or non-stock
20 corporation?

21 A No.

22 Q It's a non-stock corporation. How

1 do you receive your revenues, your receipts?

2 How is it funded?

3 A It's based on volunteer work, and
4 all my members, they all work as volunteers
5 for the organization. So I have a hundred
6 workers who work without getting paid.

7 Q Do you solicit any contributions?

8 A No, not right now.

9 Q Are the revenues zero?

10 A Correct, because I am
11 independently wealthy at this point, and I
12 don't need to owe anything to anyone. So I
13 don't have to raise funds.

14 Q What is the street address of this
15 organization?

16 A It has a P.O. box.

17 Q It has a P.O. box.

18 A Correct.

19 Q Is it fair to say it operates out
20 of your house, your residence?

21 A And other members' residence, too,
22 and also the coalition organization. I have

1 several members' partner organizations will
2 have me doing this. So they are also my
3 partners.

4 Q And how many volunteers have you
5 had?

6 A It depends with the time period.
7 During congressional legislation activities,
8 sometimes I have 60 who are working with
9 writing articles and working with the media,
10 going to Congress, meeting with various
11 congressional offices. In certain quieter
12 periods, I may have only one. So it just
13 depends.

14 Q Do you keep track of how often
15 your organization is quoted in the media
16 through Google or otherwise?

17 A We have a press section which
18 keeps track of it. Again, certain periods
19 when we have high level congressional
20 activities, which we had a lot in 2000 -- end
21 of 2005, it was almost daily, which would be
22 Congressional Quarterly, Federalist, and all

1 of these documents. Then there will be a
2 period that will be quite, like any other NGO.

3 Q What about getting articles that
4 the organization has written published in the
5 media? Does that happen?

6 A Yes. I was published by the
7 Journal of Atomic Scientists on nuclear black
8 market and nuclear whistleblowers, and that
9 was published, I believe, in 2006, and I was
10 published, together with my partner, Professor
11 William Weaver, I believe it's Federal Times
12 publication on intelligence related
13 whistleblowers.

14 Q So you began the organization, you
15 think, in 2004. About how many hours per week
16 do you devote to this organization?

17 A It depends. Certain period --

18 Q Do you have a range?

19 A Totally depends. During
20 congressional activities, I may spend 70 hours
21 a week, and during some quiet time, it may end
22 up being ten hours. It just depends.

1 Q Now, other than this organization
2 that you are the director of, any other
3 employment, work-related activities that
4 you've undertaken since your discharge?

5 A Continuing my company together
6 with my husband as a consulting company for
7 retail.

8 Q So those --

9 A Until now.

10 Q So does that exhaust the universe
11 of your work activities? You worked as a
12 consultant on the retail and inventory. You
13 are running -- you're the director of the
14 whistleblowers 501(c)(4), and does that
15 exhaust your work-related activities?

16 A No, it doesn't because I spend a
17 lot of time both researching and writing not
18 only for my Website, but for my blog and also
19 working with individuals from the intelligence
20 community on issues of interest.

21 Q And could you identify those
22 particular issues that have been of interest

1 to you? Let's start out with the most recent
2 year. Let's not take -- how about the year
3 2009? What have been the intelligence
4 activities, national security activities that
5 have been of interest to you that you pursued?

6 A Civil liberties related issues,
7 including the misuse and abuses of State
8 Secrets Privilege; the recent congressional
9 activities on legislation for whistleblowers,
10 for the inclusion of national security
11 whistleblowers who are currently not included
12 in the legislation or the mark-up.

13 Also, it has been on the -- on the
14 general, mainstream media, a trend of not
15 reporting on certain areas and issues, whether
16 it's related to national security
17 whistleblowers or certain geographic regions
18 or certain cases, this, for example. Like
19 this will be something I will be working on in
20 the next few months.

21 Q Since you left the FBI, has any --
22 has your area of interest continued with

1 regard to foreign governments corrupting the
2 State Department, Defense Department, and
3 members of Congress to get weapons material,
4 nuclear material, bribery and that kind of
5 thing; has that been an area that you've
6 pursued since you left the FBI?

7 A It's not only that I have pursued.
8 It's been because of my background, a lot of
9 sources and people have started contacting me,
10 and I have gotten to see more documents in the
11 newspaper articles, et cetera, on these areas
12 than I even had before the time or interest
13 me.

14 Q Now, you testified that the
15 government of Turkey has corrupted the U.S.
16 Congress and the State Department, et cetera.
17 What other countries do you know have also
18 corrupted the United States Congress, State
19 Department, Defense Department, National
20 Security Council through bribes, blackmail or
21 otherwise?

22 MR. KOHN: I think she identified

1 specific individuals, not entire institutions.

2 MR. FEIN: No, she identified the
3 government of Turkey. That question was
4 raised, the government of Turkey, and she said
5 the government of Turkey had corrupted the
6 United States Congress, amongst others.

7 THE WITNESS: So the question is
8 what other --

9 BY MR. FEIN:

10 Q What other countries other than
11 Turkey have corrupted the U.S. government and
12 various of its organs based upon your under --
13 you have testified most of it is money, but
14 sometimes it's blackmail -- but what other
15 governments have also accomplished that feat?

16 MR. KOHN: Objection. I object to
17 the breadth of the question. The other
18 questions were based on specific individuals.

19 MR. FEIN: Answer the question,
20 please.

21 THE WITNESS: Based on my
22 information, I had knowledge and have

1 knowledge to particular activities that was
2 done in conjunction, together jointly with
3 those entities, the Turkish entities,
4 including the ones connected to the Turkish
5 government, that were working and they were
6 with Israeli lobby groups and certain people
7 from the diplomatic community of Pakistani
8 Embassy that were operating out of Washington,
9 D.C., together with those Turkish entities.

10 BY MR. FEIN:

11 Q So your testimony is under oath
12 here that the government of Pakistan and the
13 government of Israel worked in conjunction
14 with the government of Turkey to give money
15 and to blackmail Congress people and people in
16 the government in order to get things
17 favorable from the U.S. in their foreign
18 policy?

19 A I said individual connected to
20 those offices.

21 Q Now, let's go back. When you
22 testified earlier, I think to one of Mr.

1 Manion's (phonetic) questions, you did use the
2 word "government of Turkey" had corrupted the
3 Congress and the establishment and the
4 executive branch through money and blackmail
5 and otherwise. You used the word "government
6 of Turkey." You didn't identify, oh, it was
7 only the Prime Minister or people in the
8 embassy's office. You used the word
9 "government of Turkey."

10 Now I'm asking you are you also
11 saying that the government of Pakistan, the
12 government of Israel also worked in
13 collaboration with the government of Turkey to
14 corrupt members of Congress and the executive
15 branch establishment through money or
16 blackmail in order to get foreign policy
17 favors.

18 MR. KOHN: I object. I believe
19 you have taken her testimony somewhat out of
20 context.

21 MR. FEIN: I'm repeating. I know
22 the word "government of Turkey" was used. I'm

1 not taking it out of context.

2 MR. KOHN: Well, the word
3 "government of Turkey" may have been used, but
4 I don't recollect it being used in the exact
5 context you're using it.

6 MR. FEIN: Please answer.

7 THE WITNESS: Individuals
8 connected, working with these governments,
9 with these governments, in their official
10 capacity.

11 MR. FEIN: Well, you're not asking
12 my question.

13 BY MR. FEIN:

14 Q I'm asking you to use, as you used
15 the word "government of Turkey," in the same
16 sense that you understood "government of
17 Turkey" when you used it in answering Mr.
18 Manion's (phonetic) question to apply that
19 same understanding in Pakistan and Israel as
20 to whether or not the government of Pakistan
21 and the government of Israel collaborated with
22 the government of Turkey in corrupting U.S.

1 Congress people and members in the executive
2 branch of the United States government to win
3 favors in the foreign policy and national
4 security.

5 MR. KOHN: Object to the form of
6 the question and unintelligible. Can you give
7 a simple question, please?

8 MR. MARINO: I join in the
9 objection. I can't understand the question.

10 BY MR. FEIN:

11 Q When you testified earlier that
12 the government of Turkey was corrupting the
13 U.S. Congress and the executive branch
14 officials by money, bribes, and blackmail,
15 what did you mean by "the government of
16 Turkey"?

17 A Individuals and certain
18 individuals and operatives with official
19 capacity, and that official capacity being the
20 employees and members of Turkish government.

21 Q So you did not mean the government
22 of Turkey in the sense that there was an

1 official government of Turkey policy that
2 involved bribery. You meant that these could
3 have been rogue elements that weren't
4 operating under the aegis of the Prime
5 Minister's office and doing this on their own
6 for their own personal greed or pecuniary
7 benefit.

8 MR. KOHN: Are you identifying a
9 specific person or the totality?

10 MR. FEIN: Well, I'm just trying
11 to get a clarification between her
12 understanding of individual members who belong
13 to a government. Take, for example, in the
14 United States, you can have one individual who
15 is subject -- who's found guilty of bribery in
16 the executive branch. It doesn't necessarily
17 mean that that individual was operating under
18 the aegis and the sponsorship of the President
19 of the United States and the government.

20 It might be or it might not. It
21 could be rogue or it could be in collaboration
22 with the government itself, the policy of the

1 government.

2 BY MR. FEIN:

3 Q Do you understand that
4 distinction, Ms. Edmonds?

5 A (Nodding.)

6 Q All right. Now I'm trying to take
7 that distinction and applying it to your use
8 of the word "the government of Turkey" is
9 bribing and blackmailing members of Congress
10 and the executive branch to doing favors in
11 its foreign policy and national security
12 arena.

13 Were you think government of
14 Turkey in the sense that these individuals
15 that you're referring to were acting at the
16 behest and the aegis and the sponsorship of
17 the Prime Minister and his government, or were
18 they acting as rogue elements? Which one were
19 you referring to?

20 MR. KOHN: Object to the question.
21 It is -- for example, I don't think the United
22 States government itself can engage in

1 unlawful conduct. Individuals of government
2 may be, and the government in itself may be
3 viewed as being engaged in illegal conduct,
4 but the government, but a country cannot
5 engage -- this country cannot engage in
6 illegal conduct. So --

7 MR. FEIN: Well, there --

8 MR. MARINO: Wait, wait, wait,
9 wait, wait.

10 MR. KOHN: Excuse me. The
11 problem, the perception is when the President
12 of the United States does something illegal,
13 the government has done something illegal, and
14 so I think it is difficult to try to pull them
15 apart.

16 You're asking this individual to
17 speak on behalf of actions taken on behalf of
18 the government or taken on behalf of the
19 representatives of the government, and I
20 believe it's beyond her capacity to give you
21 the specific answer you're looking for.

22 MR. MARINO: Can I make an

1 objection?

2 MR. FEIN: Of course.

3 MR. MARINO: I think these
4 questions are very argumentative. They're
5 very convoluted. I mean, I feel like you're
6 just making an argument and then asking the
7 witness a question which is unintelligible,
8 and it seems like you're defending the
9 government of Turkey and not cross-examining.

10 MR. FEIN: No, I'm responding to
11 actually something that's in the complaint
12 rather than something that's totally
13 irrelevant because one of the charges that Mr.
14 Krikorian makes against Jean Schmidt in his
15 various campaign literature that's subject to
16 the complaint is that the government of
17 Turkey, the government of Turkey gave money to
18 Jean Schmidt, and the government of Turkey,
19 government sponsored PACs gave money, and
20 that's the phraseology he uses, "government of
21 Turkey," "government," not individuals, and
22 that's why I'm trying to get your assessment

1 when you testified the Turkish government what
2 you meant by that.

3 MR. MARINO: Okay. I'm going to
4 object. I think you're mischaracterizing.
5 Why don't you show the witness the complaint
6 instead of you trying to characterize it?
7 Because I think you're mischaracterizing it.

8 MR. FEIN: I will --

9 MR. MARINO: Show her the
10 complaint. There's a copy right here.

11 MR. FEIN: Yeah, I'll show her the
12 exhibits, which is perhaps more relevant.

13 MR. MARINO: Show her your
14 client's complaint which you just
15 characterized.

16 MR. FEIN: This is the -- why
17 don't we do this? You read through -- take
18 your time -- the complaint and exhibits to the
19 complaint that form the gist of the
20 outstanding petition, and then we can ask you
21 questions about it.

22 MR. MARINO: All right.

1 MR. KOHN: Is there a specific
2 question or is she supposed --

3 MR. MARINO: May I see what you're
4 showing the witness, please?

5 MR. FEIN: Sure.

6 MR. MARINO: Is this the whole --

7 MR. FEIN: There are additional
8 exhibits, but those aren't part of the
9 question. If you want to show them, show her
10 your copy. That's fine.

11 MR. MARINO: It doesn't matter. I
12 just need to give the witness an opportunity
13 to review it.

14 Do you want to go off the record
15 while she reviews the exhibit?

16 MR. FEIN: Yeah, that would
17 probably make sense.

18 (Whereupon, the foregoing matter
19 went off the record at 2:14 p.m.
20 and went back on the record at
21 2:25 p.m.)

22 MR. FEIN: Ms. Edmonds, let me try

1 to accelerate this.

2 BY MR. FEIN:

3 Q I believe on one of the exhibits
4 the sentence I underlined there is the
5 statement to the effect -- and I think Mr.
6 Krikorian clarified this in his own deposition
7 -- that Jean Schmidt had received money from
8 the government of Turkey.

9 Do you have any personal knowledge
10 that Jean Schmidt received money from the
11 government of Turkey?

12 A No.

13 Q You'll see also, I believe, on
14 some of these, I think there are two other
15 places in that exhibit I underlined. There's
16 the statement that Jean Schmidt received money
17 from Turkish government sponsored PACs. Do
18 you have any personal knowledge as to whether
19 or not Jean Schmidt received any money from
20 the Turkish government sponsored PACs?

21 A You're asking specifically about
22 Jean Schmidt?

1 Q Jean Schmidt.

2 A No.

3 Q Okay. That's enough.

4 Now, I want to go back to the time
5 frame in which I think you were identifying
6 for Mr. Manion (phonetic), those members of
7 Congress who your judgment was had received
8 bribes, and you had mentioned Mr. Blunt and
9 Mr. Hastert and Mr. Burton and some others.
10 Now, was your knowledge based upon information
11 you had acquired prior to your leaving the
12 FBI?

13 MR. KOHN: Her knowledge would
14 have been based on information outside the
15 scope of her employment. That's how this
16 deposition has been set up.

17 MR. FEIN: Okay, but I am --

18 BY MR. FEIN:

19 Q So, number one, your knowledge was
20 not related to anything you learned in your
21 FBI employment, but I'm also asking whether or
22 not that knowledge outside your government

1 employment was acquired prior to your leaving
2 the FBI.

3 MR. KOHN: Let me rephrase it.

4 There's much of what she learned while she was
5 employed with the government that she happened
6 to also learn through additional sources after
7 she left the government. So if there was a
8 corroborating source that she learned it from,
9 whether or not she learned it in the
10 government, she would have revealed it here.

11 MR. FEIN: Right, but I guess this
12 is what I'm trying to clarify, is the time
13 frame in which the information related. Were
14 they bribed in 2001, 1998 or whatever.

15 BY MR. FEIN:

16 Q So what I'm asking is: is the
17 information you acquired, whether it was
18 corroborating information in the public record
19 or not, relating to the bribery, were the
20 bribes, the blackmail in a time frame that was
21 prior to April of 2002 when you left the FBI?

22 MR. MARINO: I'm going to object

1 to the question. I think it's really mangled,
2 and I don't know what specific things you're
3 talking about. You keep compounding things
4 that have been --

5 MR. FEIN: The question is very
6 simple.

7 MR. MARINO: No, it's not.

8 MR. FEIN: Okay. I will go
9 back --

10 MR. MARINO: Let me just finish.

11 MR. FEIN: Okay.

12 MR. MARINO: I would ask -- you've
13 been doing this for the entire cross-
14 examination -- I would ask that you just ask
15 simple, direct questions and on specific
16 things, not combining all the things you've
17 talked about. Was that based upon informa --
18 you know, break it down. I just want to have
19 a clear record.

20 MR. FEIN: Let's take one of
21 those.

22 BY MR. FEIN:

1 Q Mr. Burton you said received
2 bribes from the government of Turkey. What
3 years were those bribes received?

4 A My information that is limited for
5 the time period 1997 until January 2002.

6 Q Is that also true for all the
7 others that you've identified for Mr. Manion
8 (phonetic), that time frame?

9 MR. KOHN: "All the others" is a
10 very broad --

11 MR. FEIN: No, I'm saying the ones
12 that you had -- were on your blog. Those, I
13 think, were the ones that you related to Mr.
14 Manion (phonetic). They were the pictures
15 there that he was recounting: Mr. Hastert,
16 Mr. Blunt, and I think there were some others
17 there that I assume that you had identified on
18 your blog.

19 MR. MARINO: Again, same
20 objection. I mean, I went through them one by
21 one.

22 MR. FEIN: Okay. I'll go through

1 them one by one.

2 MR. MARINO: I think that's what
3 you should do.

4 MR. FEIN: All right. Let's go
5 through.

6 BY MR. FEIN:

7 Q So Mr. Burton, your information
8 related to the time frame 1997 up to January
9 of 2001.

10 MR. MARINO: Two.

11 BY MR. FEIN:

12 Q Mr. Blunt, what was the time frame
13 of the information relating to bribery?

14 A Mr. Blunt, to the best of my
15 recollection, the same time period.

16 Q Mr. Hastert?

17 A To the best of my recollection,
18 the same time period.

19 Q Steven Solarz?

20 A To the best of my recollection it
21 would be 1999 to January 2002.

22 Q Mr. Gephardt, Richard Gephardt.

1 A And I'm sorry. I have to go back.
2 Mr. Solarz, referring to his capacity as his
3 firm. He was not an elected representative
4 during those -- so we're not talking about
5 congressional. We're talking about --

6 Q The people that you had --

7 A Okay, and that would -- their
8 activities of receiving or those kinds of
9 activities in the context that I explained for
10 Mr. Solarz's role would be 1999 until January
11 2002.

12 Q And Mr. Richard Gephardt?

13 A I don't have any information on
14 Mr. Gephardt.

15 Q Having received any government
16 bribes --

17 A No.

18 Q -- or otherwise?

19 A No.

20 Q Do you have any information
21 relating to bribery and blackmail of incumbent
22 members of Congress that were after January of

1 2002?

2 A You mean direct information?

3 Q Yes, based on personal knowledge.

4 A No.

5 Q Do you know who Jean Schmidt is?

6 A Limited to the news articles I
7 have come across.

8 Q Before Mr. Krikorian spoke to you
9 about ten days ago, did you know anything
10 about Jean Schmidt?

11 A Very small amount that had to do
12 with some computers in 2006 that had a glitch
13 during election because this was on the
14 headlines, but no, I didn't.

15 Q Did you know anything about the
16 Turkish Coalition of America until it was
17 raised in the question by Mr. Manion
18 (phonetic) this morning?

19 A Either that or maybe in the past
20 one year I may have received some of these E-
21 mails that this organization sends on
22 supporting Turkish, you know, vote against

1 Turkish genocide because I get those from
2 Steven's association. They name may have been
3 there. I don't recall.

4 Q Do you know anything other than
5 what you've just described here about what's
6 known as TCA?

7 A TCA? Yes, I don't know.

8 Q You don't know who the officers
9 are.

10 A You work with them.

11 Q I think I'm Turkish American Legal
12 Defense Fund.

13 A Okay. Then all right, all right.

14 Q But you would know that I work
15 with them just because I told you. You didn't
16 know it independently from the informants; is
17 that correct? Or did you know that
18 independent?

19 A Your name just came up in, you
20 know, associated with that organization.
21 Maybe it was in the article that I read in
22 Politico.

1 Q Okay.

2 A But no.

3 Q Okay. I think you testified in
4 the direct examination about state secrets and
5 how that had been -- the State Secrets
6 Privilege had been employed in some of the
7 litigation that you had initiated to obtain
8 dismissal, I think, of your case and then
9 blocking is it Motley Rice having access to a
10 deposition?

11 Now, the State Secrets Privilege
12 is a legal document. Have you read Supreme
13 Court cases that identify what the elements of
14 the state secret is?

15 A I have read so much on State
16 Secrets Privilege and so many court documents.
17 Are we talking about any recent Supreme
18 Court?

19 Q Well, how about Doe v. Webster?

20 A No, I haven't.

21 Q You haven't read that. Have you
22 read Reynolds v. United States?

1 A Yes.

2 Q Totten v. the United States?

3 A Yes. Again, these were -- I read
4 all of those during my court case, and my
5 court case was active. So it would be three,
6 four years ago, namely, those cases.

7 Q Have you testified on the pending
8 legislation on state secrets that I think
9 Jerry Nadler is the chief sponsor? Have you
10 testified for any of the congressional
11 committees considering state secrets
12 legislation?

13 A No. I have to qualify that.
14 Congressional members have a kind of a gag
15 order on them because of the retroactive
16 classification and order they got from Justice
17 Department during, I believe, Attorney General
18 Ashcroft. So they don't even know if they can
19 have me there.

20 Q Well, I've testified at the
21 hearings, and they don't get into anything
22 like that. It's just what the law ought to

1 be, but that's aside. Let's move on.

2 Have you put in a fair amount of -
3 - do you study lobbyists and lobby groups and
4 how they operate in Washington?

5 A I have been reading.

6 Q And what have you read about how
7 lobby groups operate in Washington?

8 A It depends on what I have read.

9 Q Give me the books that you've
10 read.

11 A More than books --

12 Q Let me put a time frame. I don't
13 want it to be endless. Say since you left the
14 FBI, it has been mainly articles published
15 both by mainstream media and also alternative
16 media on at least the cases that have come up,
17 whether it is on, you know, APAC or the
18 conflict of interest case, such as the recent
19 case that had to do with the defense
20 contractors being related to a particular
21 Congressman Murtha and how that lobbying
22 caused -- so it would be mainly mainstream

1 media related article of the consequences of
2 the foreign lobbies and the conflict of
3 interest between certain business sectors'
4 lobby and congressional relations.

5 Q Have you ever read the Foreign
6 Agents Registration act?

7 A Several years ago, yes, and I
8 believe it is Department of Justice's Website.
9 This would be around maybe 2006 or 2005.

10 Q And what's your understanding of
11 when you have to register as a foreign agent?

12 A Again, it's been a while. It was
13 my understanding that if you work and you
14 lobbied on behalf of that foreign government.

15 Q If you're a lawyer do you have --
16 if you represent a foreign government as a
17 lawyer, do you have to register?

18 A I don't know.

19 Q What about the Lobbying Disclosure
20 Act? Are you familiar with that statute?

21 A Not as an expert and somewhat very
22 familiar with the technical language, but very

1 broad kind of understanding when I was
2 reading, again, with just the regular
3 mainstream media and all kinds of media
4 articles about this topic.

5 Q Do you have any personal knowledge
6 of the campaign that was run by Mr. Krikorian
7 in 2007-2008 election cycle in which he ran as
8 an independent against Jean Schmidt in the 2nd
9 District of Ohio?

10 A No.

11 Q If I used the word "a government
12 sponsored political action committee," what is
13 your understand of a government -- a foreign
14 government sponsored political action
15 committee? What does that mean to you?

16 In specifics, does that mean the
17 foreign government is giving money to that
18 political action committee or other things of
19 value?

20 A I'm not sure.

21 Q Does it have any meaning to you at
22 all?

1 A Government --

2 Q Sponsored.

3 A -- sponsored --

4 Q -- political action --

5 A -- political action committee?

6 Q Un-huh.

7 A I guess, again, I don't know. I
8 haven't read the description or definition of
9 that particular terminology. The meaning to
10 me would be it would be either by, commerce,
11 commerce/business sponsored, and doesn't mean
12 necessarily money or the lobbying and the
13 advocacy for by a certain group.

14 Q Okay. If it's not money, what are
15 the other things that come to mind?

16 A I'm not sure.

17 Q But money would be the most
18 prominent thing that would come to mine or
19 not? Other things compete with money as to
20 what it means?

21 A I guess that depends on which
22 country, foreign country you're dealing with

1 and what --

2 Q Dealing with Turkey, if it's
3 Turkey, if it's the Turkish government
4 sponsored.

5 A If it's a Turkish sponsored PAC,
6 up until, let's say year 2000 to January, it
7 meant certain things. I don't know what has
8 meant since then, but up until 2002, it would
9 have meant something.

10 Q And what was that?

11 A When their donations are made to a
12 certain PAC or a lobbying, well, during that
13 time period it was only done to PACs or PACs
14 that are related to congressional candidates
15 who have made covertly promises and deals
16 because they have overt promises. Yeah, I
17 will be promoting commerce, et cetera, but
18 covertly to further certain interests or
19 agendas of certain business and entities and
20 sometimes or most of the time those work hand
21 in hand with certain government agents,
22 foreign government agency.

1 Q So that was giving money prior to
2 2002; government, Turkish sponsored PACs would
3 be giving money to the PACs to give the money
4 to the members of Congress?

5 A No. You asked for the reason.
6 You said why would they give and I --

7 Q No, no. If I spoke that, it was
8 inartful. I'm not asking why they gave. I'm
9 just saying a government, a Turkish government
10 sponsored PAC prior to 2002 -- I think that
11 was the time frame you were referring to --
12 meant in your understanding that the
13 government of Turkey gave money to the PAC in
14 order to give to members of Congress.

15 I'm not asking what they sought in
16 exchange.

17 A Right, and they did so overtly and
18 covertly. For example, sometimes the money in
19 the form of a suitcase of cash would go to a
20 certain person or business entity, and from
21 that business person/entity, would be divided
22 to ten people in order to not trace the origin

1 of that money to that particular Turkish
2 government agent or Turkish government group.
3 So they did it in steps. So it just depends.

4 Q So it would be like you would use
5 or they would use the middle men. All right.
6 It has come -- the origin of the money is the
7 government of Turkey. They give till it
8 looks like a private business or entity, and
9 they tell them you then turn around and maybe
10 give it to another middle man so that there is
11 some kind of chain of custody that separates
12 the government of Turkey directly from the end
13 user, but the origin of the money is from
14 Turkey.

15 A Or a government entity associated
16 with the --

17 Q A government owned corporation or
18 enterprise of some type.

19 A Or it can be an entity, let's say.
20 Let's say it can be a military attache person
21 that is doing that, that the Turkish military
22 attache and that person is -- you know, that

1 military attache person is employed by the
2 Turkish government, and suddenly he says,
3 "Okay. I have a suitcase of \$45,000, and how
4 are we going to distribute that?" Unless they
5 have a candidate in mind, there are ways they
6 did it, and that would be -- one way would be
7 to give some of that cash. They get the
8 citizens, Turkish people who are citizens
9 here. You know, they give them cash, and they
10 have each one of those citizens write some
11 amount like under \$200, let's say, to a
12 particular candidate.

13 Even though that money didn't come
14 from those U.S. citizens, the money came from
15 Turkish Embassy, and as long as it was under
16 200, they can get 500 Turkish people. Each
17 one write \$200. So that's one of the ways
18 they do it.

19 Q Okay. All right. That answers my
20 question.

21 If a PAC gave campaign
22 contributions to a member of Congress who was

1 a sponsor of the Armenian genocide resolution,
2 then you're pretty certain that would not be
3 a PAC that got any money from the Turkish
4 government?

5 MR. MARINO: Objection.
6 Foundation.

7 MR. FEIN: Excuse me?

8 MR. MARINO: Foundation.

9 BY MR. FEIN:

10 Q Oh, I think that you testified
11 earlier in response to Mr. Marino's question.
12 I think he was asking you to speculate a
13 little bit that one of the ways in which the
14 Turkish government was able to obtain promises
15 and influence against an Armenian genocide
16 resolution, which you identified was a
17 concern, was that they would audit -- they
18 would invariably extract iron-clad promises
19 from members who were going to receive their
20 money that they would vote in particular ways.
21 They would do the bidding. They didn't leave
22 that open to chance so that they would not

1 give money to a candidate or to a member of
2 Congress who wasn't pledged to oppose the
3 genocide resolution.

4 So I'm really asking -- I guess I
5 can ask it in a similar language. That is, if
6 a PAC did give money to members of Congress
7 who were sponsors of the genocide resolution,
8 then is it your conclusion or opinion that PAC
9 was not receiving any money from the Turkish
10 government?

11 MR. MARINO: Objection. It's an
12 incomplete hypothetical.

13 THE WITNESS: That would be
14 impossible to guess because Armenian genocide
15 was one criteria, but there were other
16 criterias also, and that included, as I said,
17 the criteria that's related to the weapons
18 purchase from the United States, and which
19 general in Turkey is going to get a claim of
20 this thing, and who's going to get what money.

21 So there were, as I said, the
22 Armenian genocides was one of three or four

1 criteria that they considered and honored in
2 order to give money or not only money, but
3 also other ways of giving position, a certain
4 company to the son of certain congressional
5 person or keeping certain things secret or et
6 cetera. So that was one of -- the Armenian
7 genocide bill was one of them.

8 So maybe I'm saying in a
9 hypothetical situation that particular
10 candidate may be a sponsor of Armenian
11 genocide, when on the other three criteria
12 that are extremely important or two other
13 criteria, that person or candidate may be
14 doing important, very important favor or
15 giving important favor.

16 So I can't -- I can't tell you.
17 It just depends on the situation.

18 Or that candidate may be in a or
19 incumbent may be in a very sensitive committee
20 in Congress or Senate and in the position of
21 obtaining some very important classified
22 information they may want. So it can be other

1 things under that scenario that we just
2 discussed.

3 BY MR. FEIN:

4 Q Right. So they look at a variety
5 of criteria. Even if they don't satisfy all
6 of them, they may be some money because they
7 view some of the issues as more important than
8 others.

9 A May be.

10 MR. KOHN: Can we take a short
11 break for one second?

12 MR. FEIN: Sure.

13 (Whereupon, the foregoing matter
14 went off the record at 2:46 p.m.
15 and went back on the record at
16 2:47 p.m.)

17 BY MR. FEIN:

18 Q Ms. Edmonds, have you ever been
19 called as an expert witness in any litigation?

20 A No.

21 Q Have you ever been called to
22 testify at a committee hearing before

1 Congress?

2 A Yes.

3 Q And what hearings were those?

4 A I don't recall. They're all
5 available on the House Website, and I have had
6 several testimonies during hearings on
7 whistleblower legislation, and also I believe
8 it was House Government Reform Committee that
9 I was providing testimony for civil liberties
10 related issues, excessive secrecy and
11 classification. I believe that was was a
12 entitle 2005 -- you have to look at the
13 Website for House bill. I don't remember.

14 Q I think you did testify about, you
15 know, your knowledge of the Armenian genocide,
16 the resolution. Have you ever read the
17 genocide convention of 18 -- I mean of 1948?

18 A No.

19 Q Have you ever read the U.S.
20 genocide statute?

21 A No.

22 Q Do you know what the elements of

1 genocide are?

2 A Not technically.

3 Q If you don't know what the
4 elements of genocide are, do you know whether
5 or not the United Nations has ever voted a
6 resolution that endorsed the Armenian genocide
7 claim?

8 A No.

9 Q Do you know whether Great Britain
10 parliament has ever endorsed the Armenian
11 genocide claim?

12 A I'm not sure about Great Britain.

13 Q That's the only question I'm
14 asking right now.

15 A Yes, I know.

16 Q How about government of Sweden?

17 A I don't know.

18 Q Do you know the author Bernard
19 Lewis?

20 A Yes.

21 Q He's at the University of
22 Princeton, correct?

1 A Yes.

2 Q He's written voluminously about
3 the Middle East. Is that your understanding?

4 A I can't make objective -- any
5 comment, answer about Mr. Bernard --

6 Q I'm just have you read -- only
7 asking about --

8 A Yeah, it is.

9 Q -- things in the public domain.

10 A Yes, correct.

11 Q Has he been a White House
12 consultant?

13 A Yes.

14 Q Do you consider him a person of
15 stature in the community of scholars?

16 A No.

17 Q You don't. Why do you not place
18 him into that category?

19 A I have my own personal reasons.
20 They're based on my personal opinions.

21 Q And why is that? What is -- why
22 is it that you do not view him in the category

1 of scholars in the Middle East?

2 A Because I consider objectivity as
3 one of the criterias for being considered
4 scholarly and reputable, and I don't believe
5 his agenda -- he's not agenda driven. I
6 believe he's not objective. That's my
7 personal opinion.

8 Q If you were -- if you were hiring
9 faculty at the University of Princeton, would
10 you not hire Bernard Lewis as a scholar?

11 MR. KOHN: Objection.

12 THE WITNESS: I don't know because
13 of the situation.

14 MR. KOHN: Speculation.

15 MR. FEIN: She's speculated on all
16 sorts of things.

17 BY MR. FEIN:

18 Q Are you aware of outstanding
19 trials in Cambodia for the atrocities of Pol
20 Pot?

21 A Not the details.

22 Q Is it your view that what Pol Pot

1 did was genocide?

2 A Was it genocide?

3 Q Un-huh.

4 A I would consider it a genocide.

5 Q Do you know that, in fact, there
6 have been none of those who are on trial have
7 been accused of genocide?

8 A If they haven't been on trial --

9 Q No, they're on trial right now.

10 A Correct.

11 Q They're not being charged with
12 genocide.

13 A Okay. (Inaudible.)

14 Q Now, I want to go through a list,
15 and maybe we can add more, of the persons that
16 you identified to Mr. Manion (phonetic) that
17 had been -- had committed crimes either
18 related to bribery or stealing classified
19 information or otherwise. My list was Mr. Roy
20 Blunt, Mr. Tom Lantos, and Mr. Dennis Hastert,
21 Mr. Dan Burton, Mr. Stephen Solarz, Mr. Robert
22 Livingston.

1 Are there other current or former
2 members of Congress to your knowledge who have
3 also committed crimes that have not been --
4 none of these members have been prosecuted,
5 but have also committed crimes that have not
6 been prosecuted?

7 A Based on the definition, possibly
8 one.

9 Q And who is that?

10 A The lady we just talked about,
11 Congresswoman.

12 Q But that would be the only
13 addition you would make?

14 A Based on my knowledge, research,
15 yes.

16 Q Now, what about -- I think it's
17 fair to say in the executive branch you
18 identified Marc Grossman as always as someone
19 who's guilty of a crime. Are there any other
20 individuals in the executive branch who you
21 know are also guilty of crimes of bribery,
22 selling or leaking classified information to

1 obtain a --

2 MR. KOHN: I think the witness has
3 identified activity she viewed to be criminal,
4 not that they were guilty of criminal
5 activities.

6 MR. FEIN: Well, somebody had --
7 if there's criminal activity, somebody has to
8 commit the crime. It can't be a crime in the
9 abstract. You have to have a defendant --

10 MR. KOHN: Guilt is a legal
11 determination. It's not when you committed an
12 act that's wrong.

13 MR. FEIN: I understand. I'm
14 asking -- she's -- bribery, I assume, when you
15 mean bribery, you're not using that in a
16 colloquial sense, that it means something that
17 you didn't like. Bribery is the specific
18 elements of a crime, just like if you accuse
19 somebody of murder, you don't get to decide
20 what murder is. That's defamatory if you
21 don't have any foundation for saying that,
22 even though murder is a criminal concept.

1 BY MR. FEIN:

2 Q Now, I'm asking you. You had
3 identified Marc Grossman as someone who was
4 guilty of basically --

5 MR. KOHN: Did not use the word
6 "guilty" when you referred --

7 MR. FEIN: Engage in criminal
8 activity.

9 THE WITNESS: And I didn't
10 identify. I said that name has been
11 identified by other sources who have spoken to
12 the media, main media, has it before that
13 date, and yes, it's on the Website. His
14 picture is there, but I did not make any
15 specific allegations about or I don't have
16 specific information about Mr. Grossman. I
17 said he has been identified to me, and when I
18 was asked is it correct, I said yes.

19 BY MR. FEIN:

20 Q Okay. Do you have any personal
21 information that Mr. Grossman has committed
22 criminal activity?

1 A Yes.

2 Q And that's based on your personal
3 knowledge?

4 A Yes.

5 Q Now, are there any other current
6 or former members of the executive branch --
7 and let's take the time frame 2001-2009 --
8 that you have personal knowledge have engaged
9 in criminal activity?

10 A I can't cover time frame after
11 January 2002.

12 Q Okay. Let's take the time frame
13 1997 up to 2002. Now, other than Mr.
14 Grossman, do you have any other direct
15 personal knowledge of executive branch
16 officials, meaning executive branch in the
17 United States, who were involved in criminal
18 activity?

19 A Yes.

20 Q And could you identify those?

21 A My Website identifies them by
22 pictures.

1 Q I'm sorry. I don't -- I'm not
2 familiar with your Website. Could you just
3 enumerate the names for me?

4 A Sure, www.Just --

5 Q No, no. I just would like the
6 names of the individuals, not the --

7 A I haven't named them. I have
8 their pictures. I haven't named those
9 individuals. There are pictures there. If
10 you were to ask me and name them yourself and
11 ask me questions about them, then I will
12 answer you.

13 Q No, I'm asking you can you
14 identify the pictures on your Website?

15 A Yes, I can.

16 Q Okay. What are -- those pictures
17 that you have on your Website, identify those
18 pictures on your Website --

19 A I don't have any --

20 Q -- who are -- who are executive
21 branch officials who you say are -- have been
22 involved in criminal activity?

1 A I don't have any in front of me.

2 Q You don't remember what's on your
3 Website? You're under oath. You don't know
4 the pictures of the people who are on your
5 Website?

6 A Yes, I do, and I --

7 Q Then I'd like you to -- I'm just
8 asking you. Just tell me who they are.

9 A I have to look at them right now,
10 in front of me in order to identify each one
11 of those individuals.

12 Q Do you have any name other than
13 Marc Grossman that comes to mind?

14 A Yes.

15 Q Name that person.

16 MR. KOHN: Would you like to talk
17 to counsel?

18 THE WITNESS: Yes.

19 (Whereupon, the foregoing matter
20 went off the record at 2:56 p.m.
21 and went back on the record at
22 2:57 p.m.)

1 MR. KOHN: We have objected to the
2 question as it is formed with reveal of
3 classified information.

4 BY MR. FEIN:

5 Q Is the picture you're maintaining
6 on your Website classified information?

7 MR. KOHN: The picture is not
8 classified, but asking information related to
9 why the picture is on the Website would be.

10 MR. FEIN: So I'm getting to the
11 end here.

12 BY MR. FEIN:

13 Q If I visit your Website, your
14 testimony is that the people whose pictures
15 are there on your Website have been involved
16 to your personal knowledge in criminal
17 activity?

18 MR. KOHN: She won't answer that
19 question.

20 MR. FEIN: The answer is yes.

21 MR. KOHN: The witness will not
22 answer that question as it relates to

1 classified information.

2 MR. FEIN: I'll just visit the
3 Web.

4 I think that's all.

5 MR. MARINO: I have just a couple
6 of follow-up before you're done.

7 REDIRECT EXAMINATION

8 BY MR. MARINO:

9 Q I want to go back to some of the
10 questions Mr. Fein asked you about
11 contributions, government-sponsored acts.
12 It's back to that category.

13 You had answered the question, I
14 think, in part by saying there's covert
15 support and there's overt support. In your
16 experience, for example, I think you said you
17 had not really hear of the Turkish American
18 Council or --

19 MR. FEIN: Coalition.

20 MR. MARINO: I'm sorry. Which
21 one?

22 MR. FEIN: Coalition.

1 BY MR. MARINO:

2 Q Turkish Coalition of America.

3 That was the one you had not --

4 A Because there are so many
5 abbreviations it's so hard, but I don't --

6 Q Okay, and I think earlier you
7 testified and said you hadn't heard about the
8 Turkish American Heritage PAC.

9 A Again, they have so many names and
10 abbreviation that I don't recall now, but I
11 may have known. I just can't -- I don't
12 recall it right now, specific names of various
13 PACs because there are so many different kinds
14 that they set up.

15 Q And you described -- I think what
16 you were describing when you were describing
17 the covert kinds of support the situation
18 where an official has a suitcase full of cash,
19 gives it to ten people who are not government
20 officials, and those ten people make a
21 contribution separately to --

22 A Correct.

1 Q -- the PAC that then gives money
2 to the left, and that would be something that
3 would be considered covert.

4 A That was one of the covert ways.

5 Q Ways to do it.

6 A Right.

7 Q And so you wouldn't expect -- if
8 that happened, for example with the Turkish
9 American Heritage PAC with some Turkish
10 official who with a suitcase full of cash to
11 ten different then made contributions to the
12 PAC, you wouldn't expect the PAC to put it on
13 their Website that they got money from the
14 Turkish government.

15 A They never do. I mean up until,
16 based on my knowledge, experience to 2000,
17 they don't.

18 Q If they were doing that, you
19 wouldn't have to listen to their phone
20 conversations and figure out. We wouldn't
21 really need counterintelligence operations,
22 right?

1 MR. KOHN: Objection as to
2 listening to phone conversations.

3 BY MR. MARINO:

4 Q And in fact, if the treasurer of
5 the PAC submitted an affidavit and said, "Our
6 PAC is not, never has been sponsored by the
7 Turkish government and has never received any
8 money or non-monetary support from the Turkish
9 government," as far as we know, that treasurer
10 may not even know that the contributions came
11 in from --

12 A Right.

13 Q -- those ten people, right?

14 A Correct, or in some cases the
15 treasurer may be the key person involved,
16 carrying out these illegalities, as it was in
17 Chicago.

18 Q Would you expect them to give us
19 an affidavit saying, "Yes, we got money from
20 the Turkish government through covert
21 sources"?

22 A I wouldn't think so, no.

1 Q If they would do that, you
2 wouldn't have to --

3 A Right.

4 Q -- review telephone conversations.

5 You said that -- I want to ask you
6 a kind of personal question. You don't have
7 to answer if you don't want.

8 You indicated that you were
9 independently wealthy, and I assume that what
10 you mean by that is you don't really have to
11 work in a day-to-day job if you don't want to.
12 You have sufficient means that you don't
13 necessarily have to do that.

14 A Currently.

15 Q Okay.

16 A Currently. My husband and I, yes,
17 we worked very, very hard for 18 years, and
18 before that he did. So, yes, we don't have to
19 right now work like that.

20 Q I got the impression from your
21 testimony that when you went to work for the
22 FBI back in 2001, that money was not the

1 motivating factor for you.

2 A Absolutely not.

3 Q They offered you a chance to be a
4 FBI Special Agent.

5 A With the highest level GS the
6 moment I graduated from Quantico because of
7 the language abilities and the Master's
8 degree. It was just all the stuff which would
9 have qualified me to start at GS-12 or GS-13
10 versus the GS-8 that regular agents start.
11 That was part of the offerings they were
12 giving as part of this package, yes.

13 Q Would it be fair to say the FBI
14 found you to be a fairly valuable resource, by
15 the way?

16 A Absolutely, and I had and they
17 have several commendation letters from all the
18 agents. These are field agents that I worked
19 with, and they all submitted commendation
20 letters, and most of them request specifically
21 me for their own projects, yes.

22 Q All right, and then when the

1 issues that got you, let's say, cross-wise
2 with the FBI when they terminated your
3 contract, the FBI, the Office of OIG actually
4 investigated and determined that you're --
5 they really didn't pay enough attention to
6 your allegations, and that they were
7 substantiated, correct?

8 A Right.

9 Q And Mr. Fein asked you about the
10 travel allegations, but the four allegations
11 about Ms. Dickerson, they were substantiated,
12 correct?

13 A Correct. They were all
14 substantiated.

15 Q And so if it wasn't money, then
16 why did you go to work for the FBI in the
17 capacity that you did? What was it that
18 motivated you to do that?

19 A One reason only. Immediately
20 after September 11th, the FBI, the Justice
21 Department, they kept coming on TV, radio, and
22 they said they were desperately in need of

1 language specialists in these areas simply
2 because we didn't know if we were going to
3 have other attacks, et cetera. It just was
4 like a going and enlisting with the Army or
5 whatever. If there is a war and you're
6 attacked, then somebody taps you.

7 So I -- I just joined in order to
8 do something as a citizen to contribute
9 because I did have those languages and the
10 education, the background. So I was serving
11 the FBI during the crises and the need, so-
12 called desperate need that they had.

13 Q So you had skills and experience
14 that would be helpful to your country, right?

15 A Correct.

16 Q And out of love for this country
17 you offered those skills and experience,
18 correct?

19 A Correct.

20 Q When you reported to your
21 superiors at the FBI that you detected a case
22 of attempted espionage, why did you do that?

1 Why did you tell them about that?

2 A Because I was, first of all,
3 obligated for that security clearance and that
4 informant. One of the things I signed, my
5 basic question was if somebody tries to
6 recruit me, if I come across suspicious
7 activities or recruitment, that kind of an
8 incident, the first thing I have to do was to
9 go and report it to my superiors and the
10 Security Office.

11 So I -- I -- not only did I
12 believe that I have to go and do it. I was
13 obligated to do it.

14 Q And did you feel morally that out
15 of loyalty to your country that you should
16 report it?

17 A Absolutely.

18 Q And when you -- after you left the
19 FBI and you testified before congressional
20 committees, testified before the 9/11
21 Commission, et cetera, why were you doing
22 that? Why were you telling them all of the

1 things you were telling them?

2 A Because all along -- and that even
3 includes my court cases -- I -- the government
4 gives the State Secrets Privilege and
5 classification to cover up operations and
6 activities by Turkish entities, something
7 within government, some rogue elements, and
8 certain criminal U.S. persons that have
9 nothing to do with national security of the
10 people in the United States, that had nothing
11 to do with the national interest. It only had
12 to do with covering up these criminal
13 activities because of those high level people
14 and officials and other people who benefitted
15 from it.

16 And in fact, it jeopardized and
17 still does American security not having those
18 people accountable and not pursuing those
19 people criminally, and that was not only my
20 belief. It was the belief of all the agents
21 I work with who work on Turkish
22 counterintelligence.

1 Even the Department of Justice was
2 told by State Department to shut down their
3 investigations of particular operations.
4 These agents covertly continued it. Okay?
5 And I have been through these commissions and
6 going and testifying before Congress, inside
7 secure compartmentalized facilities, and even
8 my court case was to put this information
9 forth and force the issue so that it would be
10 publicly addressed first. American people
11 would know what's been happening and what this
12 information involved, not national security,
13 not their security first, just the opposite.

14 And second, it would be truly
15 pursued and investigate and prosecuted. So
16 you would see accountability, not only ending
17 it, but also you will see accountability.
18 Because treason, these kinds of criminal
19 activities, they're serious. These are
20 serious crimes, and these were the beliefs of
21 the agents I worked with.

22 And some of these agents have

1 talked with the members of the media. That's
2 why you have seen some of these articles.
3 They haven't gone by one or two sources. They
4 have gone to multiple sources, and it hasn't
5 happened to date.

6 But that was the reason. That has
7 been the reason why I have pursued it by all
8 the expenses and expulsion, through courts,
9 Congress, Inspector General's Office,
10 basically every legal available channel that
11 was out there.

12 Q Now, have you written any books?

13 A I'm in the process of writing a
14 book, and I am also writing a book, academic
15 book, which would be studied at Johns Hopkins
16 and Georgetown University with Professor
17 Weaver called Shoot the Messenger. That has
18 to do with whistleblower legislation,
19 specifically national security whistleblowers
20 and intelligence whistleblowers, which will be
21 published at the end of 2010 by Kansas
22 University Press.

1 Q Now, Professor Weaver, I think you
2 said, I think you said he previously worked
3 for NSA; is that correct?

4 A Correct. A long time ago, 30
5 years ago.

6 Q And can you tell us what his
7 position with NSA was?

8 A He was a member of Air Force, and
9 it had something to do with -- I don't know.
10 It was highly classified that had to do with
11 communications, which is obvious for NSA, but
12 I'm not sure.

13 Q Okay. Mr. Fein asked you about
14 certain counties and whether they had passed
15 resolutions recognizing the Armenian genocide.
16 Do you recall that?

17 A Correct.

18 Q Have some countries actually
19 passed resolutions recognizing --

20 A Yes. For example, France did
21 that, and it was important because France was
22 also frightened in their relationship with

1 Turkey would end and they were going to be
2 rewriting it and they were going to become
3 destitute, et cetera, and they didn't. They
4 did what they felt was right, and the
5 relationship has been good as far as I know.

6 Q And the United States has not
7 passed a resolution recognizing the Armenian
8 genocide so far?

9 A No, as far as I know, it hasn't.

10 Q And that's in part because
11 Congress will not vote for it because they're
12 lobbied by the Turkish lobby.

13 MR. FEIN: That's a leading
14 question.

15 MR. MARINO: That's okay. You can
16 answer.

17 THE WITNESS: Also the executive
18 branch pressuring the Congress because there's
19 always some reason. It's today Iraq, and
20 before that it was Cold War, and now it's
21 going to be Afghanistan. Then it's going to
22 be Central Asia, which is going to be

1 (unintelligible) maybe. So there's always a
2 reason underway.

3 BY MR. MARINO:

4 Q Are you pretty sure that the
5 Turkish lobby is lobbying legislators and
6 government officials in other countries as
7 well to stop them from passing such
8 resolutions?

9 A I don't know.

10 Q Why do you feel that Bernard Lewis
11 is not objective?

12 A I have read some of his scholarly
13 articles, and especially those that have to do
14 with the strategy for the United States on
15 foreign policy, that includes Afghanistan and
16 Central Asia as very agenda driven, that
17 fulfills the agenda of certain entities that
18 I happen to know about.

19 Q And by agenda driven, you mean it
20 starts with a point he's trying to make as
21 opposed to doing real analysis?

22 A Correct.

1 Q And what entities are you talking
2 about when you say it's agenda driven?

3 A Certain business entities, the
4 military-industrial complex in oil, and also
5 certain business entities, foreign business
6 entities, and that even includes certain
7 business entities in Turkey.

8 Q I think you said that since you've
9 been working with the organization you're
10 working with now, the whistleblowers
11 organization, you said that you continue to
12 get information --

13 A Absolutely.

14 Q -- from people.

15 A Including from Turkey, yes.

16 Q From Turkey, you're getting
17 information from current government people,
18 from --

19 A CIA, Defense Intelligence Agency,
20 FBI, National Security Agency, every single
21 intelligence agency we have. I have lots of
22 contacts in all of them, and these are even

1 people who haven't blown the whistle publicly
2 yet.

3 (Counsel conferred.)

4 BY MR. MARINO:

5 Q To your knowledge, do you have any
6 information about the Turkish government
7 sponsoring chairs at universities, like
8 Princeton, University of Utah, and other
9 places?

10 A Georgetown University, and not
11 only that. Some of these academic experts
12 also are recruited agents who actually steal
13 U.S. military and intelligence related
14 information because they have security
15 clearances and they have obtained position in
16 high level institutions, and one good example
17 would be RAND Corporation, and Professor Sabri
18 Sayari in Georgetown University who has stole
19 tens of millions of dollars worth of secrets
20 by actually recruiting people there that has
21 been identified to him by his superiors,
22 handlers, and he does it currently in -- was

1 doing it in 2002 with RAND Corporation, one of
2 the individuals. That's an example of
3 academic expert that they recruit.

4 Q And how do they recruit them?
5 With money and other things?

6 A Money and in some cases
7 combination of money and sexual related favors
8 and information.

9 Q Now that you have had a chance to
10 read the complaint that --

11 A No, I really -- I read the
12 article, but I didn't have time to read the
13 complaint.

14 Q Okay. I won't ask you about the
15 complaint then.

16 A Okay.

17 Q I won't ask you to read it.

18 MR. MARINO: Do you have anything
19 else?

20 (Counsel conferred.)

21 BY MR. MARINO:

22 Q If you don't mind, do you still

1 have the complaint in front of you?

2 A Yes.

3 Q If you would look at Paragraph 14
4 of Ms. Schmidt's complaint, please, and I'm
5 referring specifically to her reference to a
6 letter from Mr. Krikorian. She quotes it as
7 saying that Ms. Schmidt insanelly, quote,
8 "denies the Christian Armenian genocide at the
9 hands of the Muslim Ottoman Empire." And then
10 it goes on to say a couple of lines down,
11 "Jean Schmidt has taken \$30,000 in blood money
12 from Turkish sponsored political action
13 committees to deny the slaughter of 1.5
14 million Armenian men, women and children by
15 the Ottoman Turkish government during World
16 War I."

17 Do you see that?

18 A right.

19 Q Now, do you think that based on
20 everything that you know that Mr. Krikorian is
21 coming out of left field by saying something
22 like that?

1 A As I said, based on my first hand
2 information, my own knowledge, anybody who
3 strongly comes and denies this and also has
4 that kind of relationship with the Turkish
5 sponsored PACs and organizations, et cetera,
6 at least in the past, has been exactly for
7 this particular reason. It's been
8 representing the other foreign interest and
9 not being objective represent the United
10 States interest.

11 So this, again, as I said, it
12 fits. I don't know anything about this lady,
13 but it fits the modus operandi of all the
14 others who were on the payroll one way or
15 another. To just do this, they were on the
16 payroll of the Turkish government entities,
17 certain Turkish government --

18 Q So it wouldn't surprise you at all
19 for Mr. Krikorian to say something like that
20 under the circumstances, right?

21 MR. FEIN: That's purely
22 hypothetical and pure speculation. This goes

1 over the top. She said she hadn't even met
2 Mr. Krikorian until nine days ago, Mr. Manion
3 (phonetic), and you're asking her to get
4 inside his head?

5 MR. MARINO: You can answer.

6 THE WITNESS: I mean, there's no
7 -- that doesn't surprise me.

8 BY MR. MARINO:

9 Q If you look at Paragraph 20 of her
10 complaint, she says it would be a crime under
11 federal law for the Turkish government or any
12 foreign national to fund a political action
13 committee that made donations to a federal
14 candidate seeking election to Congress, among
15 other federal offices, and she cites a federal
16 statute. Do you see that?

17 A Yes.

18 Q Now, many of the things that you
19 describe which you have personal knowledge of
20 would be crimes under U.S. statutes, correct?

21 A Absolutely, and they would have
22 these people in jail, those people.

1 MR. MARINO: One moment. Bear
2 with me. I'm sorry.

3 (Counsel conferred.)

4 MR. MARINO: Let me just ask. The
5 passage I'm looking for, which is part of her
6 complaint, is the statement that Mr. Krikorian
7 made requesting that it be put to the voters.

8 BY MR. MARINO:

9 Q By the way, you're not a voter,
10 are you, from Ohio?

11 A No.

12 Q And you're not making
13 contributions to Mr. Krikorian's campaign?

14 A I haven't contributed to anyway.

15 Q If Mr. Krikorian asked the
16 question -- this gentleman asked the question
17 of those voters, why would you want to vote
18 for someone who has taken money from the
19 government, whose policies and practices cost
20 American lives? Would that be a crazy
21 question for him to ask under your -- based on
22 your experience?

1 A Absolutely not, and that's where I
2 would even go further. For any candidate who
3 starts really getting that kind of a close
4 relationship with any foreign government to
5 that degree and to get that kind of support
6 because of that, I -- that would be a very
7 valid -- that would be a valid question, and
8 I would not want to vote for someone.

9 MR. MARINO: Thank you, ma'am.
10 That's all I have, and I want to thank you
11 again for coming.

12 MR. FEIN: I just have two
13 questions.

14 RE CROSS EXAMINATION

15 BY MR. FEIN:

16 Q One, Ms. Edmonds, have you
17 requested that the incumbent Attorney General,
18 Eric Holder, investigate the crimes that
19 you've identified at this deposition today?

20 A I have asked his predecessor,
21 Attorney General Ash --

22 Q I'm just asking Mr. Holder.

1 A Asked him to review -- revoke my
2 State Secrets Privilege basically. That's
3 what I --

4 Q Excuse me. I did not ask about
5 the State Secrets Privilege. Have you asked
6 Mr. Holder, the current Attorney General, to
7 investigate the crimes that you've identified
8 at this deposition today?

9 A Not, not directly.

10 Q Okay. The second thing is I
11 believe in response to the last question Mr.
12 Manion (phonetic) said if you were a voter you
13 certainly would not be inclined to vote for a
14 candidate who had received and was receiving
15 money from a foreign government.

16 MR. MARINO: That's not what --

17 MR. FEIN: That's not what? Okay.
18 What was it?

19 MR. MARINO: The record said what
20 it says, but you're mischaracterizing it
21 again.

22 MR. FEIN: The record says what it

1 says, and if I can go back, I can show you
2 this here.

3 BY MR. FEIN:

4 Q I believe the sentence that he was
5 referring to, Mr. Manion (phonetic) was, and
6 now I'm quoting, "I asked the people of Ohio's
7 Second Congressional District to ask
8 themselves if our representative in Congress
9 should be taking money from a foreign
10 government that is killing our soldiers, and
11 if that assertion is true, would you be
12 inclined to vote against that candidate?"

13 MR. MARINO: That wasn't what I
14 asked, but I don't have a problem with you
15 asking that question.

16 THE WITNESS: The question is
17 would I vote for that person?

18 MR. FEIN: Yes.

19 THE WITNESS: If somebody who --

20 MR. FEIN: Yeah.

21 BY MR. FEIN:

22 Q If a candidate was taking money

1 from a foreign government.

2 A Candidate was taking --

3 Q Taking money from a foreign
4 government, and that government was the
5 government of Turkey or it could be any other.

6 A Any other government. No, I would
7 have serious questions about that.

8 MR. FEIN: Okay. That's all I
9 have.

10 MR. MARINO: That's all I have. I
11 thank you very much.

12 Do you have any other questions?

13 MR. KOHN: No, just to note for
14 the record that the Justice Department
15 apparently declined to attend the deposition
16 and that we've had no communications with them
17 other than the written communications of
18 yesterday.

19 MR. MARINO: That concludes it.
20 You have a right to read the transcript and
21 make corrections.

22 THE WITNESS: Right now, you mean?

1 MR. MARINO: No, no.

2 MR. KOHN: We would like a copy
3 provided to the witness.

4 MR. MARINO: So should we give it
5 to Mr. Kohn?

6 THE WITNESS: That would be great.

7 MR. KOHN: That will do it.

8 MR. MARINO: Thanks again.

9 Appreciate it.

10 Off the record.

11 (Whereupon, at 3:21 p.m., the
12 deposition of Sibel Deniz Edmonds was
13 concluded.)

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