

1 (PROCEEDINGS)

2 THE COURT: All right. Good morning, everyone. Why
3 don't you call the case? You can have a seat.

4 MS. WILKINSON: Good morning, Judge Russell. Calling
5 the matter of United States of America versus Reddy V.
6 Annappareddy, Criminal Number GLR 13-374. Sandra Wilkinson and
7 Catherine Pascale on behalf of the U.S. Attorney's office.

8 With me at counsel table in the well of the courtroom
9 is Special Agent Mara Lating, Federal Bureau of Investigation.

10 THE COURT: Of course.

11 MS. WILKINSON: And Special Agent James Ryan from
12 DIS. And we're here today for a variety of different defense
13 motions.

14 THE COURT: Right.

15 MR. SCHAMEL: Good morning. Mark Schamel and Josh
16 Greenberg, and Mr. Annappareddy's present before the Court.
17 And I checked with Your Honor's courtroom deputy to make sure
18 it's okay if Mr. Hinger our paralegal --

19 THE COURT: That's fine.

20 MR. SCHAMEL: -- if he may sit in the well, he's not
21 seated with us.

22 THE COURT: That's perfect. Good morning, everyone.

23 MR. SCHAMEL: Thank you.

24 THE COURT: And I'm a little concerned, it was five
25 of ten, and nobody was here from the defense, but all right.

1 As indicated, we are here for the purposes of a
2 motions hearing in this case. There's been a flurry of
3 activity over the course of the past 24 to 48 hours. The Court
4 has done the best it can to try to keep up with the pleadings
5 that have taken place and that have been filed.

6 I have had the opportunity to review the thoroughly
7 briefed initial motion to dismiss the superseding indictment,
8 as well as the supplements in this case.

9 I've also had the opportunity to review the motion to
10 dismiss as a result of the destruction of what is supposed to
11 be exculpatory evidence, and I've also read the motion to
12 dismiss based upon alleged false testimony that was presented
13 by the agent about a response from Mr. Annappareddy to a July
14 25th, 2012 e-mail.

15 The government has not had the opportunity to respond
16 to that yet --

17 MS. WILKINSON: That's correct, Your Honor.

18 THE COURT: -- in writing, but I'm going to hear from
19 the government on those points a little bit later on in the
20 proceeding shortly.

21 First, I wanted to discuss and hear from counsel
22 regarding the destruction of the evidence in this case. Based
23 upon the procedural history of this matter, there was currently
24 a pending motion for new trial, and the government seized
25 documents and other items that the government believed to be

1 evidence at the time that they seized it. So the Court
2 considers those documents and other items evidence.

3 And it's my understanding that the sole reason why
4 the government decided to destroy the non prescription drug
5 evidence absent a court order was because of space issues.

6 Miss Wilkinson; is that correct?

7 MS. WILKINSON: No, Your Honor. That's not correct.
8 That's why I started the dialogue with defense counsel about
9 the materials, because of space issues and because a lot of
10 materials had just been -- I don't know how to explain it, Your
11 Honor, just so much of it had been originally abandoned at
12 Washington Boulevard, and then eventually some of the boxes
13 brought here where defense counsel and government counsel went
14 through them, I believed I had consent to get rid of them.

15 THE COURT: Well, you didn't.

16 MS. WILKINSON: I --

17 THE COURT: You didn't, because, in fact, the defense
18 -- the defendant indicated in this Court, the last
19 correspondence by his lawyer that he intended on having a
20 friend pick those things up January 27th. And so there was no
21 consent. You couldn't reasonably have construed consent.

22 In fact, what are we talking about? Are we talking
23 about this courtroom sized fill with boxes?

24 MS. WILKINSON: No. No, not that much, Your Honor.

25 THE COURT: And how about the jury box size filled

1 with boxes?

2 MS. WILKINSON: Possibly.

3 THE COURT: Great. You mean to tell me the federal
4 government couldn't find space in either U.S. Attorney's
5 office, an area that's located in this building, or in vacant
6 office space at the U.S. Attorney's office, or any other
7 government building to house this evidence?

8 MS. WILKINSON: No. Of course, I'm not saying that,
9 Your Honor.

10 THE COURT: Right.

11 MS. WILKINSON: Of course, I'm not.

12 THE COURT: And so on top of that, this evidence, my
13 understanding, contained signature logs, which would confirm
14 the receipt or non receipt of certain prescription medication
15 that was filled. Defendant's counsel very well could have gone
16 back and had the opportunity to review that information and
17 pull whatever information out. But we're at a motion for new
18 trial. The defendant is supposed to be placed on the same
19 footing that he was before the new trial.

20 The motion for new trial was eventually conceded,
21 because the government realized the flaws, substantial flaws,
22 in its damage case that were significant. And it kept going
23 down and down and down to the point where it was demonstrated
24 there was a surplus.

25 And now we've got an issue where these prescription

1 drug logs, the delivery notes, which identify patients and
2 doctors who prescribed, is now forever lost to the defendant.

3 Were you able to duplicate it?

4 MS. WILKINSON: No.

5 THE COURT: Well --

6 MS. WILKINSON: No, Your Honor. In my -- I simply
7 provided the materials in terms of my contacts with Mr. Bonsib
8 and Miss Coleman, not knowing obviously what was going on
9 behind the scenes. And the timing, of course, is unfortunate
10 for me personally, but when I sent that last e-mail in
11 February, and indicated a communication with Mr. Bonsib, I had
12 understood, and this just goes to my lack of bad faith, Your
13 Honor, whether I'm right or wrong, I'll leave to the Court, but
14 I did not do this in bad faith. I believed in my heart that I
15 had consent.

16 And I knew that the defense had been through these
17 documents many, many times, as we did, and none of them were
18 used. And when I -- you know, I don't want to go to the
19 Supreme Court case in Arizona, but I would just tell the Court
20 that I -- you know, defense counsel have made --

21 THE COURT: The problem --

22 MS. WILKINSON: -- a number of different mistakes,
23 and I obviously feel very strongly about this one, and I'm --

24 THE COURT: I appreciate it.

25 MS. WILKINSON: And --

1 THE COURT: At the same time, this documentation
2 could be -- I mean, this is the heart of the case. And much of
3 this 2011, 2012 logs, patient logs in receipt of the medication
4 goes directly to the heart of the case, because the
5 government's whole case, theory of the case at least, at that
6 point in time, was regarding reversals.

7 And there is a possibility, and there was always a
8 possibility of a new trial. I don't understand why during the
9 pendency of a motion for new trial evidence isn't preserved. I
10 don't know why there was an effort to -- I don't know why the
11 thought was even crossed, other than, as I indicated in the
12 papers, the owners of the facility, which is a government
13 facility, said you can't keep them here.

14 MS. WILKINSON: Well, that's with regard to the pills
15 and the other items, obviously, Your Honor. This stuff was
16 stuff that had been left at this corporate headquarters in
17 Washington Boulevard, the one where I indicated through the
18 e-mail from Mr. Bonsib that items at some point were going to
19 be abandoned there, and we did go and grab some of them and
20 store them, as the Court noted.

21 THE COURT: And you grabbed them, because they were
22 evidence. You thought they were evidence.

23 MS. WILKINSON: We grabbed them so everybody could
24 look through them, Your Honor. And we grabbed them, so, in
25 that year time period, that we had them, everybody did look

1 through them many, many times.

2 And not one of them that I know of, and we have gone
3 back, and because we've gone through all the documents,
4 particularly the agents in this case, and where there was a
5 relevant document from one of those many boxes, they would
6 indicate on the back right -hand corner, the Court might
7 remember this from trial, what box it came from, and I had been
8 unable to show whether any of those materials came from those
9 four boxes.

10 And while I'm embarrassed, Your Honor, I put this
11 information before the Court, because I wanted the Court to
12 understand just my mind set about it, because it was almost
13 storing it as, Your Honor -- I don't want to overstate this,
14 but the Washington Boulevard stuff was a problem from day one
15 for everybody.

16 The government's concerns about the defense having
17 stuff and the defense concerns about what to do with all of
18 this stuff, it was a building where, when we went in there, and
19 all attorneys did, you know, there was no electricity. The
20 building was beeping all constantly from the fire alarm being
21 off. There was no running water.

22 And we would all go in and just look at things and we
23 -- I mean, we left thousands, thousands of prescriptions there,
24 Your Honor, that we could not maintain and hold onto.

25 And literally, and I just want the Court to

1 understand, these to me were sua generous documents. They
2 weren't the same as the others, and I apologize for that. I'm
3 embarrassed by it, obviously, but I did in my heart have no
4 idea this was happening.

5 Mr. Bonsib and Miss Coleman had filed the motion for
6 new trial, but I was also conferring with them. And by
7 February -- I don't have the e-mail right in front of me right
8 now, I indicated that I had communicated with them, and they
9 had no objection to this process.

10 And I believed --

11 THE COURT: No. But the last correspondence from --
12 the last correspondence --

13 MS. WILKINSON: The one in January, that's correct.

14 THE COURT: The last correspondence was he wants it.

15 MS. WILKINSON: That was on January 27th.

16 THE COURT: Yes. The last correspondence was he
17 wants them. I don't want to belabor it, but the government
18 should have gotten direct confirmation. If his lawyer had
19 written you back and said, fine, no problem, he doesn't want
20 them anymore, then we're not even having this discussion.

21 But what was left was you took his silence as a
22 waiver or no objection to the destruction. And it wasn't
23 there.

24 MS. WILKINSON: And the timeframe that had gone by,
25 Your Honor, because --

1 THE COURT: Two weeks.

2 MS. WILKINSON: No, no.

3 THE COURT: January 27th.

4 MS. WILKINSON: And March 11th is when I destroyed
5 them.

6 THE COURT: Well, February you sent him a notice, and
7 you didn't hear anything back. What's from stopping you from
8 picking up the phone?

9 MS. WILKINSON: But I think -- I mean, I don't
10 recall, Your Honor, if we go back and look at the e-mail that I
11 sent to Mr. Bonsib, it does indicate a communication that I had
12 with Mr. Bonsib.

13 THE COURT: Miss Coleman.

14 MS. WILKINSON: But again, I mean, I don't recall,
15 but if I look at the e-mails, if I could grab it first, I
16 think, Your Honor.

17 THE COURT: This is belaboring the point.

18 MS. WILKINSON: It is.

19 THE COURT: And it's belaboring the point. He wanted
20 them. You assumed incorrectly that he had no objection to them
21 being destroyed, and they were these documents, which the
22 government felt well of it enough to take from the warehouse
23 and store, were destroyed.

24 MS. WILKINSON: Now, I would go -- yes, that is
25 exactly what happened, Your Honor. And I would -- I'd note for

1 the Court that the law is if the Court finds lack of bad faith
2 and what could be potentially useful information, we don't know
3 that they're exculpatory, I believe if they were exculpatory,
4 they would have been used in the first trial.

5 THE COURT: Not necessarily. Mr. Bonsib didn't hire
6 a forensic expert.

7 MS. WILKINSON: I understand that, Your Honor.

8 THE COURT: You know, Mr. Bonsib didn't do a whole
9 lot of things that this trial team did, that eviscerated the
10 government's damage claim. Eviscerated it. It wouldn't have
11 been close.

12 The government's internal auditor, had she been
13 armed, had defense counsel been armed with the information they
14 discovered, would have eviscerated the damage claim under the
15 theory that the government proposed.

16 MS. WILKINSON: The theory that we presented at trial
17 for sure, Your Honor.

18 THE COURT: Right.

19 MS. WILKINSON: Because of the million dollar drugs
20 that were purchased in the fall, no doubt about that.

21 THE COURT: Okay.

22 MS. WILKINSON: That is the case we presented to the
23 jury. You know I am here --

24 THE COURT: What I'm going to do, I'll reserve ruling
25 on that particular ground.

1 All right. The next one was there, the next motion
2 that was filed, that I did receive a response to, was whether
3 or not the case agent testified falsely related to a review of
4 billing records about a phone call from Jigar Patel, or from
5 Mr. Annappareddy to Mr. Patel, subsequent to an e-mail that
6 allegedly confirms Mr. Annappareddy's desire to not reverse
7 high dollar medications on July 25th.

8 MS. WILKINSON: Well, what we know from the trial
9 record, Your Honor, is that Mr. Annappareddy did not address
10 this during his direct examination.

11 And at trial, the government, prior to Mr.
12 Annappareddy's testimony, had put on Agent Lating. Ironically,
13 the government had subpoenaed a number of phone records in this
14 case. The Court heard a number of summaries of Agent Lating's
15 related to a variety of different contacts at different times.
16 And most of those phone records that had been subpoenaed had
17 been uploaded into the system that Federal Bureau of
18 Investigation maintains. And on that system is a record of
19 what is kept.

20 And I didn't bring it with me today, because I
21 intended to file a written response, Your Honor, but there is a
22 printout that comes from and indicates what has been uploaded
23 and has toll records for the two critical phone numbers, Mr.
24 Annappareddy's and Mr. Patel's, at the timeframe.

25 THE COURT: Well, four numbers, because they each had

1 two numbers associated with each.

2 MS. WILKINSON: I think it's two. Mr. Annappareddy,
3 1100 number that counsel has raised.

4 THE COURT: Right.

5 MS. WILKINSON: But the ones at trial, the ones that
6 we had believed we had at the time were the 6500 number, which
7 was Mr. Annappareddy's, and --

8 THE COURT: That ends in 1100.

9 MS. WILKINSON: Not the 1100.

10 THE COURT: But didn't you subpoena the 1100 records?
11 But you only subpoenaed them from January 2011 to December of
12 2011.

13 MS. WILKINSON: That's the 6500, Your Honor. The
14 1100 is not that one, I don't have it in front of me.

15 THE COURT: Which number shows the contacts with Mr.
16 Patel's phone, which number was that?

17 MS. WILKINSON: Pardon me, Your Honor?

18 THE COURT: Which number was it? Oh, (443) 616-6500
19 was the number?

20 MS. WILKINSON: That's the number we believed that
21 Mr. Annappareddy, that we believed to be his cell phone during
22 the time.

23 THE COURT: Right. And those records were subpoenaed
24 pretrial, correct?

25 MS. WILKINSON: Yes.

1 THE COURT: Okay. But they were subpoenaed for
2 January of 2011 through December of 2011, correct?

3 MS. WILKINSON: That's one subpoena that was sent.
4 We had also sent a subpoena for the entire timeframe through
5 March of 2013, which was the date of the subpoena for the 6500.

6 The problem is, as we now know, we sent it to the
7 wrong service provider. And so the ones where the gap comes
8 in, this is what we know now, is the ones that were missing,
9 that timeframe, Your Honor.

10 THE COURT: Right. Well, the Sprint service provider
11 came back and said that the phone hadn't been activated since
12 February of 2013.

13 MS. WILKINSON: Correct.

14 THE COURT: So you knew at that point in time that
15 the records that you had in your possession didn't cover the
16 timeframe that you were seeking, right?

17 MS. WILKINSON: Yes, technically, yes.

18 THE COURT: Technically. They didn't -- it was
19 nothing technical about it. You got the records back, and the
20 exact timeframe that you were looking for wasn't contained in
21 those records. And then eventually, I guess nobody did
22 anything about it at that point in time?

23 MS. WILKINSON: Didn't observe it, correct.

24 THE COURT: And then the case agent gets on the stand
25 and testifies that she looked through the records and didn't

1 see any contacts at that time.

2 MS. WILKINSON: What the case agent did was go to her
3 system where everything had been loaded up and put in the two
4 phone numbers and didn't see a contact.

5 And Your Honor's correct, she didn't see a contact,
6 because we now know because they weren't in there.

7 THE COURT: But she didn't look at the records for
8 that timeframe.

9 MS. WILKINSON: She didn't look at the actual
10 records, correct.

11 THE COURT: Right.

12 MS. WILKINSON: She looked at what had been uploaded.

13 THE COURT: She didn't look at any records for that
14 timeframe.

15 MS. WILKINSON: She looked at the computer system
16 where all the records had been uploaded.

17 THE COURT: She didn't look at any records for July
18 2012, July 25th, 2012.

19 MS. WILKINSON: You're correct.

20 THE COURT: She didn't look at them. So that the
21 testimony that she gave, that she reviewed them, is false.

22 MS. WILKINSON: It is incorrect, that is correct,
23 Your Honor.

24 THE COURT: It's false. It's not incorrect. It's
25 false. Whether or not it was intentional or otherwise, it's

1 false, right?

2 MS. WILKINSON: I hear Your Honor, yes.

3 THE COURT: So--

4 MS. WILKINSON: I think, again --

5 THE COURT: And then when --

6 MS. WILKINSON: When we looked at in terms of records

7 --

8 THE COURT: I'm not saying that what she did was
9 intentional.

10 MS. WILKINSON: I know that.

11 THE COURT: I'm not saying the government suborned
12 perjury. I'm not saying Agent Lating perjured herself.

13 What I'm saying is false testimony was put before
14 this jury. The government made hay of that testimony. In
15 fact, highlighted it. In fact, requested that I instruct this
16 jury on the fact in there was no response, and that should be
17 constituted as an admission. Highlighted it in both closing
18 and rebuttal, and again looked and pointed to this evidence,
19 like the loss evidence, as significant evidence, right?

20 MS. WILKINSON: Yes, Your Honor. May I explain one
21 thing?

22 THE COURT: Sure.

23 MS. WILKINSON: It's somewhat of an irony, but just
24 so the record is clear, when the July 25th e-mail was uncovered
25 and in conversations with the different defense attorneys,

1 because it was very damaging, as we all know, that Mr. Patel
2 had sent -- ironically, the issue the government was dealing
3 with at the time was that Mr. Annappareddy I believe was out of
4 the country. And the comments back to us from counsel were how
5 are you going to prove he even received it? Right? How are
6 you going to prove that? It's just an e-mail.

7 Well, we're going to see if we see any response to it
8 or see if we see any phone records. So ironically, we wanted
9 to find the phone contact between Mr. Annappareddy and Mr.
10 Patel.

11 And when Agent Lating looked up in her phone system
12 and believed in her heart that the toll records had been loaded
13 up, even though they weren't, absolutely.

14 THE COURT: So nobody looked, there was never any
15 search for July 25th, 2012?

16 MS. WILKINSON: She believed they had been loaded up,
17 correct.

18 THE COURT: Right.

19 MS. WILKINSON: There's records.

20 THE COURT: But when she was looking for those
21 records, she's looking for that date specifically.

22 MS. WILKINSON: Absolutely.

23 THE COURT: She's got it in mind, because, as you
24 said, we needed to find out whether or not there was a
25 response.

1 MS. WILKINSON: Right.

2 THE COURT: So --

3 MS. WILKINSON: We wanted to know they knew, we
4 believed there should be a contact between them.

5 THE COURT: So she's looking at phone records, and
6 she's -- the date that she's honed in on is July 25th, 2012?

7 MS. WILKINSON: Absolutely, Your Honor.

8 THE COURT: And --

9 MS. WILKINSON: She's looking on a secondary source,
10 no doubt about it. She's looking at the records from --

11 THE COURT: And she didn't find it.

12 MS. WILKINSON: She didn't find any.

13 THE COURT: Then she didn't go to the primary source,
14 either.

15 MS. WILKINSON: No, she did not.

16 THE COURT: And those records were available, right?
17 The hard copies that were received were available?

18 MS. WILKINSON: We didn't have them. That's the
19 point. We never got them, because we subpoenaed the wrong
20 service provider. We did not have the July 2012 tolls at the
21 time.

22 THE COURT: I mean, she just dropped the ball,
23 because she thought it was peculiar that there were no phone
24 records prior to February 2013 with a phone associated with Mr.
25 Annappareddy.

1 MS. WILKINSON: She's doing searches of two numbers
2 on a day, and it comes up negative and, in her mind, believing
3 that they had been uploaded. Wrong. Correct. That's exactly
4 what happened, Your Honor.

5 So she looked at a secondary source, from her mind,
6 because, again, Your Honor, just seeing the breadth of -- I
7 mean, Agent Lating is one of the hardest working agents that I
8 know. She's been around --

9 THE COURT: It's not personal vouching.

10 MS. WILKINSON: I'm not vouching, Your Honor.

11 THE COURT: You are vouching. You are vouching.
12 Hey, you know, I'm not interested in vouching. I'm interested
13 in the facts. I'm interested in the facts.

14 MS. WILKINSON: The facts are we did not have the
15 record.

16 THE COURT: But I'm interested in the facts. There's
17 some significant evidence that was put before this jury that
18 this gentleman was convicted under, if it weren't for the
19 resistance of the government in the motion for new trial that,
20 because of that resistance, if I let it go, he'd be in prison
21 right now. He would be in prison. And the Court would have
22 sentenced him to prison.

23 But actually, he shouldn't be in prison, because his
24 constitutional due process rights were violated, and they were
25 violated by mistakes the government made.

1 Okay. I think I've ferreted those two issues out.

2 The second issue is with regard to the MEDIC data, I
3 do have a question about that. The MEDIC data of 1997 related
4 to the government's previous experts related to loss. It's my
5 understanding that, originally, they came out, and they came
6 out with what the government believed to be high loss figures.
7 But for whatever reason, maybe it was because of the
8 formulation or otherwise, the government didn't like the way
9 the MEDIC experts were formatting that data, but they came up
10 with a loss figure.

11 The government decided that they wanted to have an
12 internal auditor, and so Miss Hammond steps in. Data's
13 provided, evidence of loss is determined. It's sent over to
14 Mr. Bonsib.

15 At some point in time, the government determined that
16 the loss figures that were being promoted by Miss Hammond in
17 the trial of \$4.5 million, approximately, was substantially
18 higher than the MEDIC data losses that the experts had
19 indicated earlier, correct?

20 MS. WILKINSON: It's not like that, Your Honor. It's
21 comparing apples and oranges.

22 THE COURT: No. But the MEDIC folks came up with a
23 loss figure, right?

24 MS. WILKINSON: The MEDIC folks came up with a loss
25 figure based on -- their methodology is different, because they

1 looked at it from Medicare's point of view.

2 So, for example, Your Honor, if a drug wasn't
3 reimbursed by Medicare, say a drug wasn't reimbursed by
4 Medicare, but is by Medicaid, which with a lot of drugs that
5 can be the case, that they will not look at that drug, because
6 they will only look at it in the eyes of Medicare.

7 They will not look at cross-pollination between
8 pharmacies when we know that's exactly what happened here.
9 They were having trouble with the D.C. Medicare.

10 THE COURT: Cross-pollination between pharmacies,
11 what we're talking about is transfer of pills between the
12 individual pharmacies?

13 MS. WILKINSON: Exactly.

14 THE COURT: Their data said we're going to look at
15 Old Emmorton, Plumtree, and see what went in those facilities,
16 was in those facilities, and what was actually --

17 MS. WILKINSON: The view of all of the evidence they
18 were transferring inventory, constitute, like Mr. Guruvareddy
19 testified, sometimes it was stored in the office.

20 THE COURT: Got you.

21 MS. WILKINSON: So there were all these different
22 issues, and that's eventually -- I forget what the Court's
23 question was. But, yes, there was a different methodology that
24 MEDIC was using.

25 THE COURT: My point is their bottom line loss number

1 was different than what was promoted and testified to by the
2 internal auditor.

3 MS. WILKINSON: Different because you come to it --

4 THE COURT: But they were different.

5 MS. WILKINSON: Right.

6 THE COURT: It was less, right?

7 MS. WILKINSON: Well, I don't want to say that it was
8 less. I don't have it in front of me, but the MEDIC, when you
9 total up everything together, I -- it is -- I don't remember
10 what the two figures are, Your Honor, but I don't remember them
11 being distinctly different from one another. But I'll let the
12 Court's recollection --

13 THE COURT: But loss is loss. And whether or not,
14 under one formulation, the MEDIC formulation compared to the
15 internal auditor's analysis, that MEDIC formulation was
16 actually helpful to the defense --

17 MS. WILKINSON: Well, I disagree with that.

18 THE COURT: -- because it's less.

19 MS. WILKINSON: Well, I disagree with that, Your
20 Honor, because it's still substantial and material through the
21 whole thing.

22 My understanding of the MEDIC analysis is that that
23 -- the losses were very significant as of March of 2014. And
24 --

25 THE COURT: But I think the comparable was something,

1 if I recall the figures correctly, it was 100, it was like a
2 130 some thousand dollar loss, which is 10% of the \$1.3 million
3 that Miss Hammond testified to.

4 MS. WILKINSON: The methodologies were no doubt
5 different, Your Honor.

6 THE COURT: I understand the methodology. I
7 understand the methodology is different. I understand that
8 MEDIC came up with a loss amount using another methodology
9 that's different, that's different. And you came up with an
10 in-and-out methodology that is different but terribly flawed.

11 And that methodology, if the defense had it, then
12 they would have been able to cross-examine Miss Hammond on the
13 discrepancy.

14 MS. WILKINSON: Your Honor, may I just --

15 THE COURT: Yes.

16 MS. WILKINSON: I feel the need to -- I do not want
17 to argue with the Court in terms of the falsity of what
18 happened in front of the jury. But it is so important to
19 remember, because now looking back at it in hindsight, there's
20 no doubt this was a disaster, no doubt. I see that. Right.

21 I didn't feel it when I was doing, but it definitely
22 feels like it now, having that looked at, and I know it sounds
23 very ironic, Your Honor, but the government truly was trying to
24 give Mr. Annappareddy the benefit of every doubt. And it's the
25 double-counting and the lack of ADAP that really caused the

1 problems. Let me finish this.

2 THE COURT: Which everyone knew. You know there was
3 always a risk of double-counting with the MEDIC folks. That's
4 what they told you could happen. And sure enough, it happened.

5 MS. WILKINSON: And Your Honor, let me just go back
6 to my point about why we're still seeing in Miss Hammond's this
7 much less shortage that nobody disputes was wrong when it was
8 presented to the jury was false, when it was presented to the
9 jury.

10 However, Your Honor, it made a basic assumption to
11 the benefit of Mr. Annappareddy that cannot go unnoticed here,
12 because there is still a problem in his shortages. And again,
13 putting the loss figures aside, through the pill shortages, as
14 the Court has noted, what we're talking about here, Miss
15 Hammond's analysis assumed, in October of 2012, when she
16 stopped her analysis, that that million dollars' worth of drugs
17 that came in January -- in -- strike that, in September and
18 October, the ones that we had testimony about at trial, that
19 million dollars' worth of drugs, that she -- her analysis
20 assumed that that million dollars' worth of drugs was available
21 to take -- to account for the claims that happened in 2007.

22 So she's giving a total number of all six numbers at
23 the end.

24 THE COURT: As opposed to going to month to month.

25 MS. WILKINSON: As opposed to going month to month.

1 The reason why that is so significant, Your Honor, is because
2 those drugs could not -- yes, the jury heard this, too, but we
3 didn't make the same argument to them, because we were -- just
4 gave them the bottom line number, but that's --

5 THE COURT: You didn't have to, because the loss was
6 -- you didn't have to, because the representations regarding
7 you can't sell what you don't have were so powerful.

8 MS. WILKINSON: And they still are, because if you go
9 month by month by what Miss Kelly sees, now you see from 2008,
10 2009, 2010, the shortages gradually were adding together, and
11 by that time of August 31st, when we know Mr. Annappareddy knew
12 about the investigation, and then bought that million dollars'
13 worth of drugs, we now know it canceled out that bottom line
14 that Miss Hammond showed.

15 But if you go to Miss Kelly's analysis, which perhaps
16 we should have done in the first place, Your Honor, go back and
17 done it month by month, I'm not an accountant, didn't
18 understand it, but you cannot use those million dollars' worth
19 of drugs and cancel out all the claims that happened before
20 when they didn't account for the ones that happened in the two
21 months when we had the drugs on hand.

22 And yes, we did not make that argument to the jury,
23 and we were I guess satisfied with what Miss Hammond had to
24 say, because we believed in our heart it was correct.

25 And we thought it was conservative, which is just the

1 irony in all of this. We thought was we were giving Mr.
2 Annappareddy the benefit of that, Miss Hammond said that. And
3 it was still wrong.

4 But it was if you correct the data and you look at it
5 the way a pharmacy would look at it, which is now frankly the
6 way MEDIC, only they will do it from the eyes of Medicare, not
7 Medicaid, where a lot of these drugs were from, you still see
8 the hundred thousand short, whatever short that Miss Kelly
9 shows, which is still quite substantial and ironically is close
10 to what we now know to be whatever they knew would be the pill
11 shortage in this case.

12 But you know, can I go back and fix that? I can't,
13 Your Honor. I cannot go back and next that. It's done.

14 And my whole point at the end of the day, yes, these
15 attorneys have been very zealous in finding every error the
16 that we made, every one of us have made an error. We've talked
17 about how I've made an error, Agent Lating's made an error,
18 Miss Pascale's made an error, Agent Ryan, Agent Mosely, we've
19 all made mistakes in this massive, massive case that we had.

20 And we tried very hard through the whole thing. I'm
21 not vouching, I'm just talking about the sheer volume of
22 everything we had and our relationship with counsel to try to
23 present the fairest picture that we can.

24 It is what it is, as they say. And I don't envy the
25 Court. But you know by the time I truly understood -- and I

1 know the Court has concerns about this, I'll just say it like
2 it is. When Miss -- when this whole issue about the dispensing
3 fee, we were told by DCDOH submitted an affidavit that the
4 dispensing fees could be accounted for by other things.

5 When we first got the Medicaid warehouse records in
6 that flurry of activity during the trial, they did not account
7 for all of the dispensing fees.

8 It wasn't until counsel found a third-party
9 contractor that had -- that still don't have all the records
10 that justify all those dispensing fees, but we give, I know it
11 sounds ironic in hindsight, but of course we give them credit
12 for that, but we did not understand that as it was evolving.

13 And in hindsight, do I wish that as soon as I got the
14 punch in the gut I knew there was a double-counting from Miss
15 Hammond that stopped it right then? But I didn't understand it
16 until I could go back. We've invested a lot of time and effort
17 in this case, had huge amount of evidence in Mr. Annappareddy's
18 fraudulent conduct outside of this.

19 THE COURT: But that was the most -- but their
20 argument would be --

21 MS. WILKINSON: I hear you.

22 THE COURT: -- he's a sloppy businessman.

23 MS. WILKINSON: I understand that.

24 THE COURT: He had sloppy business practices.

25 MS. WILKINSON: That wasn't his defense, but yes.

1 THE COURT: Well, it could have been. You know, you
2 brought in a handful of prescription drugs --

3 MS. WILKINSON: The defense that was presented was a
4 completely different defense than these ones, I get that, Your
5 Honor. And you know, this is just about whether or not we can
6 overcome these mistakes and go forward. And you know that's a
7 decision the Judge has to make, obviously.

8 THE COURT: Right.

9 MS. WILKINSON: The evidence was otherwise powerful.
10 The government, you know, submits that we would still be able
11 to maintain our burden of proof. But do I look back on this
12 every day, every minute, and account for it? I'm a government
13 prosecutor. I care about the process. I care about it.

14 And you know, I don't know what to say.

15 THE COURT: This case has occupied the better portion
16 of my two months as well.

17 MS. WILKINSON: Of course it has, and defense
18 counsel, too.

19 THE COURT: Yes.

20 MS. WILKINSON: I get that. I'm not suggesting or,
21 you know, for all of that, I see what happened here. And you
22 know, human error and we make mistakes, and I don't know how to
23 --

24 THE COURT: I got you. All right.

25 Who's handling this, Mr. Schamel or Mr. Greenberg?

1 MR. SCHAMEL: I guess a question first, I'd like to
2 make a point, something Miss Wilkinson said, just so Your
3 Honor's not misunderstanding. Mr. Annappareddy was not in
4 India on the 25 of July. He left on the 29th or 30th of July.
5 The phone records bear that out we provided to the Court. We
6 can produce travel records, if that's necessary.

7 What would Your Honor like to hear?

8 THE COURT: Whether or not you have any response to
9 government's counsel's response to my inquiry.

10 MR. SCHAMEL: I'll let Mr. Greenberg answer one of
11 the --

12 THE COURT: I just want to make sure I'm clear for
13 the record, that I'm not unclear regarding any of the facts in
14 this case as part of the supplemental motions, the initial
15 motions and supplement motion.

16 I understand that there are other grounds that the
17 defense is asking that the second superseding of the indictment
18 be dismissed under, but I'm specifically looking at the ones
19 that I've mentioned here already here.

20 MR. SCHAMEL: And those I mean we still intend to
21 file a reply to what the government filed yesterday on the
22 issue of, you know, there's still briefing to be done here, so
23 I would ask if Your Honor's inclined not to disavow or deny
24 these motions, that we'd be given that opportunity to finish up
25 the record.

1 THE COURT: Mr. Greenberg?

2 MR. GREENBERG: May I walk over to the podium?

3 THE COURT: Sure.

4 MR. GREENBERG: Your Honor, we are going to file
5 replies in support of the motions regarding the five phone
6 calls from Mr. Annappareddy to Jigar Patel on July 25th, 2012
7 and on the intentional destruction of documents while a new
8 trial motion was pending without notice to the Court or Mr.
9 Annappareddy. Those replies will address the statements that
10 were made by the government today.

11 THE COURT: Well, the government, I don't know what
12 you're going to put in a reply that would be any more
13 persuasive than what you've already indicated. The
14 government's indicated that, I don't know why you're expending
15 the resources to do that.

16 I mean, the government's indicated that there was
17 evidence that was destroyed, that I've already found that Mr.
18 Annappareddy didn't give consent to it, in fact, objected to,
19 sought out, if not objected, sought out the documents, so what
20 is in dispute that you're seeking a reply to?

21 MR. GREENBERG: Your Honor, there are multiple
22 statements in the government's response yesterday that are not
23 factually accurate.

24 THE COURT: Let me sort it out. Let's go.

25 MR. GREENBERG: Could I just grab the response?

1 THE COURT: Yes, I mean, that's fine. The government
2 has admitted that the evidence that was put forward by the
3 witness relating to the phone call was false. It was material.
4 It was significant.

5 (Defense counsel conferring with defendant.)

6 MR. GREENBERG: Your Honor, I think the issue is that
7 we would like to have a chance to brief, and we'll do it
8 expeditiously, we would like to have the issue about whether
9 the phone call issue and whether the destruction of documents
10 were done in good faith.

11 And I will point out, Your Honor, that as Your Honor
12 very correctly noted, signature logs and refill log books are
13 at the heart of this case. They were apparently exculpatory,
14 because they show deliveries of medications, that was the key
15 issue in the case.

16 Your Honor could dismiss the case right now on the
17 ground, without finding bad faith, that they were apparently
18 exculpatory, they covered years, and that now Mr. Annappareddy
19 can never have a fair trial.

20 If the Court is not inclined to do that, however, we
21 would ask a chance to fully brief the matter and respond to the
22 issues that the government has raised. We'd also like -- or
23 rather statements in the government's response.

24 And there are also facts we don't know yet we've
25 asked the government for answers, they haven't answered, such

1 as how many box of documents they have destroyed. They have
2 not answered that question.

3 THE COURT: How many boxes of documents, four, four
4 paper boxes?

5 MS. WILKINSON: I think we did answer that.

6 THE COURT: So there are four paper boxes.

7 MS. WILKINSON: They're --

8 THE COURT: The kind of boxes the sides that you
9 would put reams of paper in?

10 MR. SCHAMEL: I think they're called bankers boxes.

11 THE COURT: Bankers boxes, yes.

12 MS. WILKINSON: I don't recall the size of the boxes.

13 THE COURT: Somebody knows.

14 MS. WILKINSON: They were boxes, that most of
15 everything that we got was in the size of banker boxes.

16 THE COURT: Okay. Okay.

17 MR. GREENBERG: Your Honor. And we would like an
18 opportunity to fully respond in writing to the statements about
19 the communications with Mr. Bonsib, the lack of responses by
20 Mr. Bonsib, the selective intentional destruction, covertly
21 without notice to anyone, of four boxes of apparently
22 exculpatory documents.

23 Unless the Court is inclined to dismiss today on the
24 ground that because they are apparently exculpatory and because
25 they cover years, we don't need to proceed any further, and the

1 Court can certainly do that.

2 THE COURT: All right.

3 MR. GREENBERG: But certainly, we would ask
4 respectfully for a chance to brief the issues on the loss
5 calculations.

6 It's undisputed that the prosecutors were personally
7 involved in the preparation of the false loss calculations,
8 that they closely supervised the preparation of those false
9 calculations, and that the calculations were prepared in the
10 U.S. Attorney's office.

11 The documents the government produced on October
12 13th, 2015, show that the prosecutors were reckless in
13 presenting their false loss calculations to the jury.

14 The government does not dispute that those documents
15 show the following three things: First, Exhibits 23 and 26 of
16 the motion, which are docs 430-25 and 430-28, those documents
17 show that the prosecutors knew that they needed to look for and
18 remove duplicate claims, because the same claims appear in
19 multiple claims files.

20 They have not disputed that point, and they can't
21 dispute it.

22 Second, Your Honor, Exhibits 24 and 26 to the motion,
23 which are 430-26 and 430-28, those documents show that the
24 prosecutors knew that a substantial and unjustified risk
25 existed that the first auditor's loss calculations were

1 artificially inflated by double-counting errors.

2 Third, Exhibit 33 to the motion, Docket Number
3 430-35, that's a document that the first auditor prepared in
4 July 2014, many months before the trial, right around the time
5 that the government announced it was abandoning MEDIC and
6 switching to the lead auditor. That comparison is stunning.

7 It shows that for 18 of the 28 medications for which
8 the first auditor found shortages, including seven of the most
9 -- eight of the most expensive medications, the shortages she
10 found are much larger than those that MEDIC found.

11 And the prosecutors knew that MEDIC didn't count
12 pills that were transferred among stores. They knew that MEDIC
13 data excluded duplicate claims and the data the first auditor
14 used did not. And they knew that the first auditor counted
15 transfers.

16 It is undisputed that, knowing all three of those
17 things, the prosecutors did nothing to look for or remove
18 duplicate claims. Instead, the prosecutor --

19 THE COURT: Well, but there is evidence that even
20 within the notes themselves that they wanted to scrub the data
21 for double-counting errors. That cuts both ways. You can say
22 that they knew about the double-counting errors, but then
23 there's evidence that they tried to scrub the double-counting
24 errors. And they knew that could potentially be a problem.

25 Now, did they think they did what they were

1 supposed to do in getting rid of the problem? Maybe. I don't
2 know. But the problem existed.

3 There was a double-counting issue that existed. They
4 knew it, and I think there's specific notes in there from the
5 prosecution team saying, hey, guys, we need to make sure that
6 we scrub this data for double-counting. I'm concerned about
7 that. They were concerned about it.

8 So you know to say that they ignored it, I don't
9 think is accurate.

10 MR. GREENBERG: Well, Your Honor, the record shows
11 that document prepared in the U.S. Attorney's office that
12 specifically expressed and identified the need to scrub the
13 data and look for double-counting errors, that was never
14 followed up on is not in dispute. We raised the issue. They
15 responded. They haven't denied that they did nothing for
16 looking for double-counting errors. That's reckless.

17 THE COURT: Other than saying that they would.

18 MR. GREENBERG: Other than saying that they would and
19 didn't.

20 THE COURT: I don't think, I don't read the documents
21 in a way that says they didn't do it. I don't read it like
22 that at all.

23 MR. GREENBERG: Maybe Your Honor should ask them if
24 they did it?

25 THE COURT: No. Not right now. Not at this stage.

1 MR. GREENBERG: Well, Your Honor, this is not just
2 about one exhibit with only one mistake. This is about seven
3 exhibits with false loss calculations the prosecutors presented
4 to the jury with respect to claims that Pharmacare submitted to
5 Medicaid and other government insurance programs. That was the
6 heart of the prosecutor's case.

7 It's about Government Exhibit S 1, the false loss
8 calculation for all stores. It's about Government Exhibit S
9 19, the false loss calculation for all stores broken down by
10 drug strength with information about the payment for each pill.
11 That shows the level of detail that these prosecutors wanted in
12 their exhibits and how focused they were on these exhibits.

13 THE COURT: Excuse me one moment.

14 (Pause.)

15 THE COURT: Excuse me very much, Mr. Greenberg, sorry
16 about that.

17 (Defense counsel conferring with defendant.)

18 THE COURT: I'm sorry to interrupt you, Mr.
19 Greenberg.

20 MR. GREENBERG: Your Honor, I won't go through all of
21 the government exhibits, but there are seven government
22 exhibits with false loss calculations that were presented to
23 the jury, as Your Honor knows.

24 If all seven of these exhibits were just a mistake,
25 the prosecutors would not have resisted producing internal

1 documents revealing that the exhibits are false.

2 If this were all just a mistake, they would have
3 voluntarily produced all of those documents long before the
4 trial began.

5 The prosecutors didn't do that. They withheld
6 internal documents prepared by their own experts and their own
7 auditor that directly contradict the false loss calculations
8 they presented to the jury.

9 The prosecutors produced some of those internal
10 documents only after we filed the motion to compel. They
11 produced others only after the Court had granted the motion to
12 compel in October 6th, 2015.

13 The documents that the government produced after the
14 Court granted the motion to compel, the ones they produced on
15 October 13th, 2015, include the key documents showing why
16 dismissal with prejudice is warranted. And those key documents
17 are the four specific exhibits that I identified earlier.

18 And Your Honor, it is undisputed that those documents
19 were withheld. Those documents directly contradict the false
20 loss calculations, loss calculations that were presented to the
21 jury.

22 As Your Honor pointed out earlier, had they been
23 produced, they could have been used to eviscerate the
24 government's case at trial, and the result might have been
25 different.

1 And the fact that the prosecutors waited until after
2 the Court granted our motion to compel, produced the key
3 documents underlying our motion to dismiss, can't be reconciled
4 with the notion that this is all just one mistake by one
5 auditor about one note.

6 We don't have a single new declaration explaining
7 what happened. We have documents showing they knew about the
8 risk of double-counting errors. We argued and showed the
9 documents they did nothing to look for double-counting errors.

10 They had a full chance to respond. They submitted a
11 brief. They have never maintained they did anything to look
12 for double-counting errors.

13 It's undisputed in the record they did not look for
14 double-counting errors. The government has not answered any of
15 the core facts underlying this motion to dismiss.

16 All we have are declarations from 2015 that, with all
17 respect, are less than a hundred percent accurate, and they
18 don't address any of the documents that were produced on
19 October 13th, 2015.

20 The facts showing that the prosecutors were reckless
21 in presenting false loss calculations to the jury stand
22 uncontested.

23 THE COURT: They are contested, Mr. Greenberg. I
24 don't know whether or not you're reading from a script, but
25 we've gone through this.

1 I mean, they are contesting. They are saying they
2 didn't, they didn't engage in this, in bad faith. They are
3 contesting that. It is not uncontested. That's precisely what
4 they're doing, saying, look, these are mistakes that ended up
5 happening. They're embarrassed by them. They shouldn't have
6 happened. Had they had things to do all over again, they would
7 do things differently, but they're adamant about lack of bad
8 faith here, so it is contested.

9 MR. GREENBERG: Your Honor, they don't contest the
10 point about whether they were reckless, but the actual facts
11 and the documents about what they knew and when they did, what
12 they did and didn't do, those facts are uncontested.

13 It's also undisputed that a second trial would
14 substantially prejudice Mr. Annappareddy by unfairly allowing
15 the government to profit from having presented false evidence
16 to the jury.

17 Not only have the prosecutors failed to dispute this
18 point, they have actually embraced it and conceded it. In
19 their response to the motion to limit evidence, the prosecutors
20 admit that they would use evidence in the second trial to fix
21 the significant problems in their case that we had to bring to
22 the Court's attention and to the prosecutor's attention when we
23 litigated the motion for a new trial.

24 The prosecutors openly stated they may adapt their
25 trial strategy based on information they learned during the

1 first trial and may call witnesses who did not testify at the
2 first trial. The prosecutors' own words prove that a second
3 trial would substantially prejudice Mr. Annappareddy.

4 Allowing a second trial under the extraordinary
5 circumstances here would allow the government to profit from
6 the prosecutors recklessly presenting false evidence on
7 material issues of the first trial. That would reward the
8 prosecutors for what happened in violation of the Fifth
9 Amendment due process clause. The Court should not allow that
10 result to happen.

11 And Your Honor, the documents that we have show that
12 this is more than mistake. Another document produced on
13 October 13th, 2015 shows that, as of December 1st, 2014, during
14 the trial, the prosecutors had in their hands an analysis
15 showing that the D.C. Department Of Health supplied 90,099
16 pills to Pharmacare.

17 That internal analysis, which was prepared in the
18 U.S. Attorney's office, is Exhibit 15 to the motion at Docket
19 Number 430-17.

20 Despite having that analysis in their hands, the
21 prosecutors affirmatively represented to this Court in a filing
22 on October 9th, 2015, that the DCDOH supplied only 15,750 pills
23 to Pharmacare. Then four days later, the prosecutors produced
24 the analysis that they had withheld since December 1, 2014, in
25 response to the Court granting the motion to compel.

1 THE COURT: Yes, I do have a question about that.
2 Can somebody test the accuracy of that representation? In
3 other words, the representations in the papers, and I noted
4 that there were before me, and then as it turns out, this
5 document pops up that maybe the government knew that there was
6 the --

7 MS. WILKINSON: The Court will recall what happened,
8 when Miss Hammond was cross-examined the first time, Mr. Bonsib
9 raised the issue of the ADAP, and very much exploited her lack
10 of knowledge about it.

11 She went back and saw from the pamphlet, because she
12 had never done this before, there were dispensing fees. Then
13 there was a flurry of activity to get the actual records of
14 what had been produced to Pharmacare.

15 And that's where that figure comes in, Your Honor.
16 It's from the actual records from the warehouse showing what
17 had been given to Pharmacare. That's all we had for a long
18 time period.

19 And then DCDOH, admittedly a very difficult agency to
20 deal with in D.C., told, you know, the affidavit for Mr. Ansari
21 that we had introduced was that there was another explanation,
22 told me there was another explanation about these dispensing
23 fees, because we didn't have the actual records showing that
24 they had been replenished.

25 I don't know, maybe it's an issue of when the

1 replenishment happened later. We just didn't have them.

2 We tried hard to find them with D.C., just like Mr.
3 Bonsib and Miss Coleman did at that time, and we did later all
4 the way up until I don't remember the timeframe, when counsel,
5 I can't remember the name, counsel can probably help me, a
6 third-party contractor that had additional records of what went
7 on to Pharmacare, D.C. Medicaid never told us about that.

8 THE COURT: No. He's saying you had in your
9 possession evidence about the replenishment program and the
10 90,000 pills and then represented in the papers to the Court
11 that there was still a 90,000 pill deficit.

12 MS. WILKINSON: The dispensing fee and the actual
13 records showing what was dispensed and replenished are two
14 different things, in our mind. We didn't know enough about the
15 program, because we missed a big one. And that's when we first
16 started, what are these?

17 And it's that night, and I don't have Miss Hammond
18 here to explain it, but again, Your Honor, this was an evolving
19 education of the U.S. Attorney's office, Miss Hammond, and
20 everybody else, about what this replenishment program was. And
21 it wasn't until counsel found the third-party contractor's
22 name, and we saw the records, which frankly, Your Honor, still
23 don't account for all of the dispensing fee money that was
24 there, but were all agreeing now that's what it is, because we
25 feel like the records are just lacking.

1 THE COURT: After you saw the records, did you still
2 -- did you still contest?

3 MS. WILKINSON: No. That's when we eventually said
4 you got it. Right. That's my recollection of it. I am not
5 disputing for one moment that this wasn't an evolving education
6 on our behalf, because we were floored. We were floored by the
7 double errors. Right, Your Honor. Floored by it. And just
8 trying to understand what happened.

9 And it requires a lot of moving parts and a lot of
10 deliberation with my office, and --

11 THE COURT: Okay.

12 MS. WILKINSON: I don't know how much more rollover.

13 THE COURT: Okay. I'm sorry, Mr. Greenberg. I cut
14 you off, because I needed to get an answer to the question.

15 MR. GREENBERG: No problem, none whatsoever. I think
16 the timeline here is very important, and it shows that this was
17 not done in good faith. This was the intentional suppression
18 of exculpatory information that directly contradicted the
19 representations by the government to the Court.

20 Even after producing the analysis that was, as far as
21 we know, last modified in December 1st, 2014, showing 90,099
22 pills, first of all, why wasn't that analysis produced during
23 the trial?

24 Second of all, and after they produced that analysis
25 on October 13th, 2015, many months went by before they

1 corrected their false affirmative representation to the Court
2 that only 15,750 pills were replenished. They didn't correct
3 that misrepresentation to the Court until May 23rd, 2016.

4 That's not good faith.

5 And even then, in the same filing, on May 23rd, 2016,
6 they obfuscated. They attached Exhibit H, which shows many
7 fewer pills than 90,099 were replenished, and they tried to
8 still fudge on the numbers.

9 Your Honor, there's another document that was
10 withheld intentionally that I think is very significant. On
11 September 29th, 2015, the prosecutors had an internal document
12 prepared at the U.S. Attorney's office finding that the D.C.
13 store Pharmacare had a surplus of 14,162 pills. We didn't
14 receive that document until this summer. And we received it
15 apparently by mistake, because we got it when a vendor scanned
16 the government's trial exhibits September 29th, Your Honor,
17 2015, that's two days before the government stood up and told
18 this Court to exclude the D.C. store from the loss calculation
19 analysis.

20 At the same time, the prosecutors were suppressing an
21 exculpatory document in their own office showing that the D.C.
22 store had a surplus, they told the Court to ignore that store.

23 And as Your Honor has pointed out, the expert's
24 findings and MEDIC in 1997 directly contradict the false loss
25 calculation in Government's Exhibit S 23, which is absolutely

1 critical, because that was the exhibit that told the jury and
2 this Court that when Mr. Annappareddy was the pharmacist at Old
3 Emmorton, there were massive losses. That exhibit was false.
4 And if it were false in good faith, they wouldn't have withheld
5 a document showing the opposite.

6 I want to say a little bit about Lisa Ridolfi and the
7 Ryan --

8 THE COURT: I don't want to hear.

9 MR. GREENBERG: Sorry.

10 THE COURT: I don't need to hear about it.

11 MR. GREENBERG: Okay. Does Your Honor have any
12 questions on the loss calculation issues?

13 THE COURT: No.

14 MR. GREENBERG: Thank you, Your Honor.

15 We would ask, to the extent that the Court is not
16 inclined to dismiss based on the motion to dismiss that we
17 filed on August 1st, that the Court then please respectfully
18 we'd request consider all of the motions to dismiss
19 collectively.

20 THE COURT: We've got a couple, we've got today, and
21 we've got the 8th, the 9th as well, if we need to, with regard
22 to anything, anything additional.

23 Miss Wilkinson, any brief reply or anything on these
24 issues?

25 MS. WILKINSON: Can I confer?

1 THE COURT: Sure.

2 (Pause)

3 MR. GREENBERG: If I could just add one more point?
4 To the extent that the Court is not yet sure that it wants to
5 dismiss this case, we respectfully ask not only that it rule on
6 all the motions to dismiss collectively, but also to disqualify
7 the prosecution team, compel the government --

8 THE COURT: I know. You've got all your pending
9 motions. I know that. They're not going anywhere. I mean,
10 they're filed. I'm taking it in discrete parts. There's
11 stuff, there are motions that haven't been responded to yet,
12 because they were filed yesterday afternoon.

13 MR. GREENBERG: Very well.

14 THE COURT: Anything else, Miss Wilkinson?

15 MS. WILKINSON: One second, Your Honor.

16 MR. SCHAMEL: Your Honor, may I ask a scheduling
17 question while Miss Wilkinson's conferring?

18 Before our last phone hearing, we raised the issue
19 whether Your Honor needed the two days on 8th and the 9th. I
20 had found myself in a pretty uncomfortable conflict on the 8th,
21 I have a trial in Virginia, it got scheduled because my wife
22 had baby, I was in the hospital the day of the trial, my half
23 day of paternity leave, I'm not sure what Your Honor's
24 intentions are, I know Miss Wilkinson responded to chambers, we
25 thought we could get everything done just on the 9th.

1 So I would ask Your Honor to consider --

2 THE COURT: I'm not certain. I'm the one that has to
3 decide it. I'm not certain, because you know I have to take a
4 hard look at it.

5 All right. Miss Wilkinson, anything else?

6 MS. WILKINSON: Just one second, Your Honor.

7 (Pause.)

8 MS. WILKINSON: Your Honor, the only comment I want
9 to make is about the Old Emmorton stuff that came in later,
10 when we were making the decision to transfer. And at the time,
11 and I'm looking at one of my own notes here, or an e-mail, I
12 believed that we requested MEDIC to conduct a review of only
13 Pharmacare at Old Emmorton for the time period 1/3/2007 through
14 1/6/2012 with a breakdown by year.

15 We were focusing on the theory that there was fraud
16 or shortages prior to Miss Ridolfi's arrival, hired, I put that
17 in our papers that we wanted to see if there was shortages,
18 which we now know there were, prior to 2010. And not solely
19 while she was employed at Pharmacare, after her hire. That was
20 the purpose of the final review.

21 When we looked at it, the review of those that prior
22 to Lisa being hired on 1/20/11, there was a loss of \$490,954,
23 shortage of 24 out of 68 drugs. And during her employment, a
24 loss of 93,000.

25 And to me, that reflected, when I read the Old

1 Emmorton analysis, again, my understanding of it was that
2 showed the fraud was going on long before Miss Ridolfi was
3 hired.

4 And I only make that comment, because, again, going
5 to our state of mind, when we reviewed Old Emmorton, the part
6 they did, when we were transitioning, it wasn't because we
7 thought MEDIC was bad for us. It was because we were having
8 trouble working with them and understanding them. And it's not
9 their fault, either, just a natural evolution of what we
10 thought would be more convenient.

11 And the last thing I want to notice, Your Honor, had
12 we intended to conceal or disguise any strategy of Miss Hammond
13 before this Court, which I think the Court can take into
14 consideration and has her affidavit, we would not have
15 permitted and allowed and encouraged and invited counsel to
16 come with defense counsel in July 2014, with all of her files
17 in front of her, and ask her any questions they wanted to.

18 I don't know other attorneys that do that, come talk
19 to my expert. Talk to her. Sit down. She'll answer any
20 question you have.

21 And I appreciate that sometimes attorneys don't want
22 to do that, because it might reveal their trial strategy, but
23 again when it goes to our good faith in a very challenging,
24 massive case, which only got more massive after we arrested Mr.
25 Annappareddy, because of the Washington Boulevard documents,

1 and because of the search warrant at Eloise Lane, which took
2 months for Agent Ryan to try to inventory, and the pressures of
3 the trial schedule, and everybody trying to review the
4 discovery that this happened.

5 We concede. I can see it now with benefit of
6 hindsight and attorneys that have been -- I don't say ruthless
7 in a bad way, but ruthless in trying to ferret out the
8 government errors, and they have, and here they are.

9 But again, those are the last comments I would make.

10 THE COURT: Okay. Here's what I'm going to do, I'm
11 going to take into consideration everything I've heard so far
12 this morning, as well as the written submissions, and I'll be
13 prepared to rule at noon today.

14 MS. WILKINSON: Thank you, Your Honor.

15 (Recess.)

16 THE COURT: All right. You can be seated.

17 Pending before the Court is defendant Reddy
18 Annappareddy's motion to dismiss the second superseding
19 indictment, Counts 1 and 2, with prejudice, that would be ECF
20 430. The motion is fully briefed.

21 The defendant seeks to have the indictment dismissed
22 on several grounds including, but not limited to, the
23 government's failure to turn over evidence favorable to him in
24 violation of the government's discovery obligations under Rule
25 16 of the Federal Rules of Criminal Procedure. Specifically,

1 the defendant asserts that the government committed several
2 *Brady* violations in that the government had, in its possession,
3 evidence favorable to the defendant related to loss amounts
4 determined by the government's first expert witnesses; that the
5 evidence was material and significant; and that the evidence
6 was not disclosed to the defendant; and that the defendant was
7 not aware of its existence.

8 The defendant has also filed a supplement to the
9 motion to dismiss on the grounds that a government witness
10 presented false testimony related to contact the defendant had
11 with a co-defendant subsequent to an e-mail from Mr. Jigar
12 Patel to Mr. Annappareddy confirming Mr. Annappareddy did not
13 want to have high-dollar medications reversed.

14 The government argued before the jury that the
15 defendant's failure to contact Mr. Patel should be construed as
16 an admission. The government repeatedly pointed out the lack
17 of response by the defendant in their closing arguments and
18 asked for and received a special instruction that his silence
19 constituted an admission. This evidence, designed as further
20 support of Mr. Annappareddy's intent to defraud, was material
21 and significant. That is ECF Number 483.

22 The government did not have a chance to brief the
23 issue in writing but was questioned by the Court in today's
24 hearing. The defendant has filed another last motion to
25 dismiss based upon the government's destruction of allegedly

1 exculpatory evidence during pendency of a motion for new trial,
2 ECF 485. The government has responded to this motion.

3 Evidence is material if there is a reasonable
4 probability that, had the evidence been disclosed to the
5 defense, the result of the proceedings would have been
6 different. A reasonable probability is a probability
7 sufficient to undermine the confidence of the outcome.

8 The mandates found in *Brady* do not stop at the
9 prosecutor's door. The knowledge of some who are part of the
10 investigative team is imputed upon the prosecutor regardless of
11 the prosecutor's actual awareness. A showing that there is
12 evidence that merely impeaches those who do not testify lacks
13 relevance, much less materiality. *Brady* materials must be
14 requested by the defendant, and the request must be made with
15 sufficient specificity to identify the materials. A *Brady*
16 violation does not show what exculpatory information is not
17 only available to the defendant, but also lies in a source
18 where a reasonable defendant would have looked.

19 On September 4th, 2013, the government produced
20 preliminary information related to losses to the government
21 insurance programs from the alleged fraud by the defendant.
22 These loss calculations were created by a team of individuals
23 hereinafter called the MEDIC team, who specialize in the
24 analysis of the healthcare claims made by pharmacies and were
25 familiar with reimbursement procedures related to healthcare

1 claims.

2 The government intended to call this team at trial to
3 testify as to the loss amounts in the inventory of pills
4 Pharmacare possessed versus the amount of pills prescribed by
5 the defendant and those working under him.

6 On January 13, 2014, the government identified the
7 names of these individuals. On July 16th, 2014, the government
8 announced that this team would be replaced by an internal
9 auditor at the U.S. Attorney's office. The government
10 represented that the previous witnesses were unable to
11 summarize and analyze the data in the way the government
12 requested. The government failed to disclose specific
13 information regarding the opinions of these individual
14 witnesses as to the loss amounts or surpluses at any individual
15 pharmacy within the Pharmacare chain.

16 The government did provide information from its new
17 internal auditor as to the loss amounts. The evidence
18 presented at trial and was represented by the government as the
19 most significant evidence supporting the defendant's intent.

20 The Court agrees. Initially, the loss amounts were
21 projected at \$4.5 million. However, at the end of the
22 presentation of the government's case, the government conceded
23 that an error had been made, and those amounts were reduced to
24 a little over \$2 million.

25 Nevertheless, based upon the numbers presented to the

1 jury, the government was correct, and this Court finds, that
2 the evidence of loss amounts was significant, material evidence
3 of the defendant's criminal intent. To be certain, there was
4 other evidence of fraud as well.

5 After a continuance of the trial date due to delayed
6 discovery related to the production of loss figures by the
7 government, a jury trial commenced. Subsequent to the
8 defendant's conviction on December 15th, 2014, the defendant
9 filed a timely motion for new trial, ECF No. 176.

10 The government provided notice to the defendant of
11 their intent to destroy certain evidence. The defendant sought
12 additional time to collect the evidence and indicated that he
13 would be having a friend pick up the evidence by the end of
14 January 2015.

15 On February 5th, 2015, after having not heard from
16 the defendant or counsel, the government provided notice of
17 their intent to destroy certain items seized during the
18 previous search warrants. The government indicated in the
19 notice that the defendant did not object to the destruction of
20 this evidence.

21 On March 12th, 2015, the destruction of non drug
22 items commenced. Among the items destroyed were delivery
23 signature logs, delivery master logs, and UPS delivery logs
24 that confirmed the patients received their medications, and
25 identified doctors who wrote the prescriptions.

1 The defendant subsequently discharged his counsel and
2 hired present counsel. Present counsel requested a lengthy
3 extension to supplement the motion for new trial. The
4 government strongly resisted this request. The Court granted
5 the defendant's extension, and the parties engaged in extensive
6 discovery and investigation related to loss amounts and other
7 matters.

8 The defendant, during this time, sought via subpoena
9 documents and information related to the analysis conducted by
10 the MEDIC team of experts identified early on as witnesses who
11 would testify as to loss amounts suffered by the government
12 programs. The government filed a motion to quash the subpoena,
13 which was denied by the Court.

14 Once this information was received, according to the
15 defendant, the government had in its possession pretrial
16 evidence that the loss amounts were lower than those presented
17 by the government's internal auditor at trial. Further,
18 documents revealed that the Old Emmorton location at Pharmacare
19 at which Mr. Annappareddy conducted most of this alleged
20 fraudulent activity, according to the government, had a
21 surplus.

22 Further, documents revealed that the MEDIC team could
23 not conduct the loss calculations according to the needs of the
24 government because of a risk of double-counting errors. In
25 fact, additional documents reveal that the government was well

1 aware of double-counting error possibility.

2 The possibility of double-counting errors or
3 accounting errors was never disclosed to the defense. Had the
4 MEDIC loss figures and the Old Emmorton surplus and other
5 inventory records been revealed, counsel for the defendant
6 would have known or could have discovered the loss amounts were
7 not nearly as great as portrayed by the government. In fact,
8 this analysis would have revealed, as has been demonstrated
9 post-trial, that the government's loss theory and calculations
10 were completely wrong.

11 The government suggests that the analysis should have
12 been conducted on a month to month inventory. The government's
13 original analysis did not take this into account, but analyzed
14 the inventory over a lengthy period of time. While this may be
15 true, the government, in this Court's opinion, failed to
16 disclose Brady material possessed by their MEDIC experts
17 including, but not limited, to MEDIC 1997 inventory analysis at
18 Old Emmorton store and the D.C. pharmacy in violation of Rule
19 16.

20 The Court also finds that the MEDIC witness opinions
21 of losses, which were not as great as those testified to by the
22 government's internal auditor, should have been turned over in
23 discovery immediately after the disparity was discovered by the
24 government.

25 Although the losses may have been calculated using a

1 different formula, they nevertheless were losses that were less
2 than those presented to the jury and therefore should have been
3 turned over.

4 Armed with this information, a reasonable trial
5 lawyer knowing of the discrepancy in losses very well would
6 have employed an expert to analyze the damage and loss.
7 Further, an attorney could have used this information to
8 cross-examine the internal auditor regarding the accuracy of
9 her loss calculations.

10 Finally, being armed with this information would have
11 provided the defendants with notice of the inconsistencies and
12 provided them with a basis for subpoenaing the relevant parties
13 from the MEDIC team to testify as to what they believe the loss
14 calculations were and/or the risk of proceeding with a formula
15 or evaluation system like the one used by the internal auditor.

16 As indicated earlier, the loss was the most
17 significant evidence supporting the defendant's fraudulent
18 intent. As indicated by the government, you can't sell what
19 you don't have. This point was emphasized both in the opening
20 closings and rebuttal.

21 Had this information been turned over, it would have
22 likely been used, and there would have been a strong
23 possibility that it could have changed the outcome of the case
24 based upon the fraud theory promoted by the government during
25 the course of trial.

1 Recently, the Court has become aware of additional
2 false testimony promoted by the government related to the July
3 25th e-mail by Jigar Patel. The government emphasized this
4 false testimony to the jury and asked for silence as an
5 admission instruction. This false testimony was significant
6 and material and was highlighted by the government. The
7 government represented to the jury through the case agent that
8 the defendant never responded to the e-mail. Specifically, the
9 agent testified she reviewed phone records of both Mr. Patel
10 and the defendant and saw no phone contacts between them during
11 the relevant timeframe.

12 This testimony was false. In fact, the records
13 recently subpoenaed by the government reveal that there were
14 several contacts between the defendant's phone and Mr. Patel's
15 phone within minutes of the e-mail being sent. The Court makes
16 no finding at this time whether the testimony constitutes
17 perjury and, if so, whether the testimony was knowingly used by
18 the prosecution. Nevertheless, the Court is very troubled by
19 the second incident of false testimony promoted by the
20 government and most importantly government agents.

21 The Court makes no determination at this point
22 related to intent or willfulness, but it was sloppy and at
23 least negligent.

24 The conduct of the government related to the
25 promotion of the latest false testimony and the false loss

1 evidence previously exposed was improper. The evidence was
2 significant, relevant, and material. The evidence misled the
3 jury and was highlighted for supporting the defendant's
4 criminal intent. The evidence contributed, in this Court's
5 opinion, to the defendant's conviction. Accurate testimony and
6 proper disclosures would have significantly weakened the
7 government's case according to the fraud theory presented at
8 trial. This is not to say that it made the government's case
9 impossible, but only that it would have made it more difficult.

10 The Court is also troubled by the destruction of
11 evidence by the government during the pendency of a motion for
12 new trial. I find the defendant never consented to the
13 destruction. In fact, the government was aware of the
14 defendant's desire to retrieve the non drug items proposed to
15 be destroyed. The government should have at the very least
16 received actual consent or a court order. Caution should have
17 prevailed and the evidence preserved. The evidence destroyed
18 could have proven what and how many medications were received
19 by patients and how they were ordered and filled.

20 Assessing value to these items is not the
21 government's call. The value should have been left up to the
22 defendant. The excuse of not having space to store the items
23 is incredible. The federal government could have found a place
24 to store the items, and it was irresponsible not to do so,
25 especially during the pendency of a motion for new trial that

1 the government eventually conceded.

2 Although the Court recognizes the government may not
3 have realized the significant flaws in its case at the time of
4 the destruction, the defendant and his new counsel is not and
5 cannot be put in the same position he was in at the time of the
6 original trial.

7 What further compounds the issues before the Court is
8 that the motions to dismiss and the post-trial discovery reveal
9 that the government knew of the possibility of accounting
10 errors with their loss formula pretrial. The defendant did
11 not. Even assuming the defendant possessed all of the raw data
12 related to the losses, he operated at a disadvantage and was
13 not on equal footing with the government.

14 One of several keys to his defense were, I guess to
15 use an analogy, in a huge haystack, but he wasn't told that
16 there were even keys or if he was told where to look for them,
17 which the government was obligated to do, as those keys were
18 favorable to the defense.

19 The failure to disclosure is in violation of *Brady*,
20 the history of late disclosures and the promotion of false
21 significant testimony in this case does shock the conscience of
22 this Court.

23 Mr. Annappareddy has been charged and has charges
24 pending against him since 2013. The Court makes no
25 determination as to Mr. Annappareddy's guilt or innocence

1 related to the pending charges. The Court certainly recognizes
2 that there was evidence presented of fraud that is not included
3 in the tainted evidence that was presented.

4 Furthermore, the Court is very hesitant to invade the
5 province of the Executive Branch of government. However, the
6 Court finds that the violations of Rule 16 and the defendant's
7 Fifth Amendment Constitutional right to due process due to the
8 aforementioned conduct of the government including its
9 witnesses at trial is sufficient to require the Court to enter
10 an order dismissing both Counts 1 and 2 of the second
11 superseding indictment with prejudice.

12 In the event that my record is not clear or exercise
13 of my discretion too broad, this Court will conduct an
14 extensive time-consuming and costly hearing as to these matters
15 and the other grounds supporting the motion to dismiss and
16 other motions which have already been filed. To that end, the
17 balance of all other motions in this case are denied as moot.

18 Any questions?

19 MR. SCHAMEL: I do, Your Honor, an unrelated matter
20 if I may?

21 THE COURT: Yes.

22 MR. SCHAMEL: It's sort of strange place to wade
23 into. I've been talking to Mr. Patel's immigration lawyer at
24 some length about the filings that have been made by both
25 parties. He's languishing. He's sitting in a holding cell in

1 a prison in York, Pennsylvania. He's now apparently had his
2 hearing continued until December to determine whether or not
3 he's going to be removed. And it was continued because of the
4 hearing that -- I'm told by his immigration lawyer that the
5 only questions were asked were not about his actual asylum
6 claim, but actually about this case, which she describes to be
7 being unorthodoxed.

8 I don't know other than what she has told me, you
9 have our pleadings and our opinions, our documentation from our
10 investigator from our meetings with him letters he sent us.

11 I personally believe he's innocent. I personally
12 believe he pled guilty, because he was afraid of the loss
13 calculations here, and I personally believe that the only
14 reason he pled guilty was because of that fear, and he intended
15 to file a motion to withdraw.

16 I don't know what power Your Honor has, but I would
17 ask Your Honor, and I believe if you ordered him down here to
18 this district as opposed to being held up there in immigration,
19 if Your Honor ordered him here on his case, Your Honor would
20 have the power to give him bond until such time as his
21 immigration issue could be heard.

22 THE COURT: At this point in time, you don't
23 represent him.

24 MR. SCHAMEL: I don't, Your Honor.

25 THE COURT: So I'm not going to entertain it.

1 MR. SCHAMEL: I understand, Your Honor. I just told
2 the immigration attorney I would raise it.

3 THE COURT: Anything from the government?

4 MS. WILKINSON: No, sir.

5 THE COURT: All right. Thank you.

6 (Proceedings adjourned.)

7

8

9

10 I, Jacqueline Sovich, RPR, RMR, CRR, Official Court
11 Reporter, do hereby certify that the foregoing is a correct
12 transcript from the stenographic record of proceedings in the
above-entitled matter.

13

14 _____
Jacqueline Sovich
15 Official Court Reporter

DATE

16

17

18

19

20

21

22

23

24

25

- - -

-HAND [1] 8:6

- 1 -

13-374 [2] 1:6;
2:6
14,162 [1]
44:13
15,750 [2]
40:22; 44:2

- 4 -

430-17 [1]
40:19
430-25 [1]
33:16
430-26 [1]
33:23
430-28 [2]
33:16, 23
430-35 [1] 34:3
490,954 [1]
47:22

- 6 -

616-6500 [1]
13:18

- 9 -

90,099 [1]
40:15
90,000 [2]
42:10, 11
90,099 [2]
43:21; 44:7
93,000 [1]
47:24

- A -

ABANDONED [2]
4:11; 7:19

ABANDONING
[1] 34:5
ABOUT [56]
3:13; 4:8, 22,
23, 25; 6:23;
8:12, 16, 17;
11:20; 12:4;
14:19, 22;
18:10; 20:3;
21:11; 24:6, 14,
18; 25:12;
26:17, 21; 27:1,
2; 28:5, 13;
31:8; 32:18;
34:22; 35:6, 7;
36:2, 7, 8, 10,
16; 38:5, 7;
39:7, 10, 11;
41:1, 10, 22;
42:7, 9, 14, 20;
45:6, 10; 47:9;
60:24; 61:5, 6
ABOVE-ENTITLED
D [1] 62:11
ABSENT [1] 4:5
ABSOLUTELY
[4] 17:13, 22;
18:7; 44:25
ACCORDING [4]
54:14, 20, 23;
58:7
ACCOUNT [6]
24:21; 25:20;
27:6; 28:12;
42:23; 55:13
ACCOUNTANT
[1] 25:17
ACCOUNTED [1]
27:4
ACCOUNTING
[2] 55:3; 59:9
ACCURACY [2]
41:2; 56:8
ACCURATE [4]
30:23; 35:9;
38:17; 58:5
ACTIVATED [1]
14:11

ACTIVITY [4]
3:3; 27:6;
41:13; 54:20
ACTUAL [9]
15:9; 39:10;
41:13, 16, 23;
42:12; 51:11;
58:16; 61:5
ACTUALLY [5]
19:23; 21:16;
22:16; 39:18;
61:6
ADAMANT [1]
39:7
ADAPT [1]
39:24
ADDING [1]
25:10
ADDITIONAL [5]
42:6; 45:22;
53:12; 54:25;
57:1
ADDRESS [3]
12:9; 30:9;
38:18
ADJOURNED [1]
62:6
ADMISSION [4]
16:17; 50:16,
19; 57:5
ADMIT [1]
39:20
ADMITTED [1]
31:2
ADMITTEDLY [1]
41:19
AFFIDAVIT [3]
27:3; 41:20;
48:14
AFFIRMATIVE
[1] 44:1
AFFIRMATIVELY
[1] 40:21
AFOREMENTIONED
ED [1] 60:8
AFRAID [1]
61:12
AFTER [12]
37:10, 11, 13;
38:1; 43:1, 20,

24; 47:19;
48:24; 53:5, 15;
55:23
AFTERNOON [1]
46:12
AGAIN [11]
10:14; 16:4, 18;
19:6; 24:12;
39:6; 42:18;
48:1, 4, 23;
49:9
AGAINST [1]
59:24
AGENCY [1]
41:19
AGENT [17]
2:9, 11; 3:13;
12:3, 12, 14;
14:24; 15:2;
16:12; 17:11;
19:7; 26:17, 18;
49:2; 57:7, 9
AGENTS [3]
8:4; 19:7;
57:20
AGREEING [1]
42:24
AGREES [1]
52:20
ALARM [1] 8:20
ALLEGED [3]
3:12; 51:21;
54:19
ALLEGEDLY [2]
12:6; 50:25
ALLOW [2]
40:5, 9
ALLOWED [1]
48:15
ALLOWING [2]
39:14; 40:4
ALMOST [1]
8:12
ALREADY [4]
29:19; 30:13,
17; 60:16
ALTHOUGH [2]
55:25; 59:2
ALWAYS [2]
7:7; 24:3

- AMENDMENT** [2]
40:9; 60:7
- AMERICA** [2]
1:4; 2:5
- AMONG** [2]
34:12; 53:22
- AMOUNT** [3]
23:8; 27:17;
52:4
- AMOUNTS** [11]
50:3; 52:3, 14,
17, 20, 23;
53:2; 54:6, 11,
16; 55:6
- ANALOGY** [1]
59:15
- ANALYSIS** [21]
22:15, 22;
24:15, 16, 19;
25:15; 40:14,
17, 20, 24;
43:20, 22, 24;
44:19; 48:1;
51:24; 54:9;
55:8, 11, 13, 17
- ANALYZE** [2]
52:11; 56:6
- ANALYZED** [1]
55:13
- ANNAPPAREDD
Y** [27] 1:7; 2:6;
3:13; 12:5;
13:2, 21; 17:3,
9; 18:25;
23:24; 24:11;
25:11; 26:2;
29:3; 30:6, 18;
31:18; 39:14;
40:3; 45:2;
48:25; 50:12;
54:19; 59:23
- ANNAPPAREDD
Y'S** [8] 2:16;
12:6, 12, 24;
13:7; 27:17;
50:20; 59:25
- ANNAPPAREDY'
S** [1] 49:18
- ANNOUNCED** [2]
34:5; 52:8
- ANOTHER** [7]
22:11; 23:8;
40:12; 41:21,
22; 44:9; 50:24
- ANSARI** [1]
41:20
- ANSWER** [4]
29:10; 32:5;
43:14; 48:19
- ANSWERED** [3]
31:25; 32:2;
38:14
- ANSWERS** [1]
31:25
- ANYMORE** [1]
9:20
- ANYONE** [1]
32:21
- ANYTHING** [9]
10:7; 14:22;
38:11; 45:22,
23; 46:14;
47:5; 62:3
- ANYWHERE** [1]
46:9
- APOLOGIZE** [1]
9:2
- APPARENTLY**
[6] 31:13, 17;
32:21, 24;
44:15; 61:1
- APPEAR** [1]
33:18
- APPEARANCES**
[1] 1:14
- APPLES** [1]
20:21
- APPRECIATE** [2]
6:24; 48:21
- APPROXIMATEL
Y** [1] 20:17
- ARGUE** [1]
23:17
- ARGUED** [2]
38:8; 50:14
- ARGUMENT** [3]
25:3, 22; 27:20
- ARGUMENTS** [1]
50:17
- ARIZONA** [1]
6:19
- ARMED** [4]
11:13; 56:4, 10
- AROUND** [2]
19:8; 34:4
- ARRESTED** [1]
48:24
- ARRIVAL** [1]
47:16
- ARTIFICIALLY**
[1] 34:1
- ASIDE** [1] 24:13
- ASKED** [4]
31:25; 50:18;
57:4; 61:5
- ASKING** [1]
29:17
- ASSERTS** [1]
50:1
- ASSESSING** [1]
58:20
- ASSOCIATED** [2]
13:1; 18:24
- ASSUMED** [3]
10:20; 24:15,
20
- ASSUMING** [1]
59:11
- ASSUMPTION**
[1] 24:10
- ASYLUM** [1]
61:5
- ATTACHED** [1]
44:6
- ATTENTION** [2]
39:22
- ATTORNEY** [2]
56:7; 62:2
- ATTORNEY'S** [9]
2:7; 5:4, 6;
33:10; 35:11;
40:18; 42:19;
44:12; 52:9
- ATTORNEYS** [6]
8:19; 16:25;
26:15; 48:18,
21; 49:6
- AUDITOR** [16]
11:12; 20:12;
22:2; 34:3, 6, 8,
13, 14; 37:7;
38:5; 52:9, 17;
54:17; 55:22;
56:8, 15
- AUDITOR'S** [2]
22:15; 33:25
- AUGUST** [2]
25:11; 45:17
- AVAILABLE** [4]
18:16, 17;
24:20; 51:17
- AWARE** [4]
50:7; 55:1;
57:1; 58:13
- AWARENESS** [1]
51:11
-
- B -
-
- BALANCE** [1]
60:17
- BANKER** [1]
32:15
- BANKERS** [2]
32:10, 11
- BASED** [8]
3:12, 22; 20:25;
39:25; 45:16;
50:25; 52:25;
56:24
- BASIC** [1] 24:10
- BASIS** [1] 56:12
- BECAUSE** [62]
4:5, 9, 17; 5:21;
7:4, 21; 8:3, 11,
12; 9:25;
11:19; 12:20,
25; 15:6; 17:1,
23; 18:19, 23;
19:6, 20, 23;
20:7, 25; 21:5;
22:3, 18, 20;
23:19; 24:12;
25:1, 3, 5, 6, 8,
24; 31:14;
32:24; 33:18;
41:11, 23;
42:15, 24; 43:6,
14; 44:15;

45:1; 46:12, 21;
47:3; 48:4, 6, 7,
22, 25; 49:1;
54:24; 61:3, 12,
14
BECOME [1]
57:1
BEEPING [1]
8:20
BEFORE [19]
1:12; 2:16;
5:19; 8:11;
16:13; 19:17;
25:19; 34:4;
37:3; 41:4, 12;
43:25; 44:17;
46:18; 48:2, 13;
49:17; 50:14;
59:7
BEGAN [1] 37:4
BEHALF [4]
1:15, 19; 2:7;
43:6
BEHIND [1] 6:9
BEING [9] 8:20;
10:21; 20:16;
22:11; 47:22;
56:10; 57:15;
61:7, 18
BELABOR [1]
9:17
BELABORING
[2] 10:17, 19
BELIEVE [7]
11:3; 17:3;
56:13; 61:11,
12, 13, 17
BELIEVED [13]
3:25; 4:14;
6:14; 9:10;
13:6, 20, 21;
17:12, 16; 18:4;
20:6; 25:24;
47:12
BELIEVING [1]
19:2
BENEFIT [4]
23:24; 24:11;
26:2; 49:5

BETTER [1]
28:15
BETWEEN [7]
17:9; 18:4;
21:7, 10, 11;
57:10, 14
BILLING [1]
12:4
BONSIB [13]
6:7, 11; 7:18;
9:5; 10:11, 12;
11:5, 8; 20:14;
32:19, 20; 41:8;
42:3
BOOKS [1]
31:12
BOTTOM [3]
21:25; 25:4, 13
BOUGHT [1]
25:12
BOULEVARD [4]
4:12; 7:17;
8:14; 48:25
BOXES [15]
4:12, 23; 5:1;
8:5, 9; 32:3, 4,
6, 8, 10, 11, 12,
14, 15, 21
BRADY [6]
50:2; 51:8, 13,
15; 55:16;
59:19
BRANCH [1]
60:5
BREADTH [1]
19:6
BREAKDOWN [1]
47:14
BRIEF [6] 31:7,
21; 33:4;
38:11; 45:23;
50:22
BRIEFED [2]
3:7; 49:20
BRIEFING [1]
29:22
BRING [2]
12:20; 39:21
BROAD [1]
60:13

BROKEN [1]
36:9
BROUGHT [2]
4:13; 28:2
BUILDING [4]
5:5, 7; 8:18, 20
BURDEN [1]
28:11
BUREAU [2]
2:9; 12:17
BUSINESS [1]
27:24
BUSINESSMAN
[1] 27:22

- C -

CALCULATED
[1] 55:25
CALCULATION
[5] 36:8, 9;
44:18, 25;
45:12
CALCULATIONS
[18] 33:5, 7, 9,
13, 25; 36:3,
22; 37:7, 20;
38:21; 51:22;
54:23; 55:9;
56:9, 14; 61:13
CALLED [2]
32:10; 51:23
CALLING [1]
2:4
CALLS [1] 30:6
CAN'T [7] 7:13;
25:7; 26:12;
33:20; 38:3;
42:5; 56:18
CANCEL [1]
25:19
CANCELED [1]
25:13
CANNOT [4]
24:11; 25:18;
26:13; 59:5
CATHERINE [2]
1:17; 2:7
CAUSED [1]
23:25

CAUTION [1]
58:16
CERTAIN [6]
5:14; 47:2, 3;
53:3, 11, 17
CERTAINLY [3]
33:1, 3; 60:1
CERTIFY [1]
62:10
CHAIN [1] 52:15
CHALLENGING
[1] 48:23
CHAMBERS [1]
46:24
CHANCE [5]
31:7, 21; 33:4;
38:10; 50:22
CHANGED [1]
56:23
CHARGED [1]
59:23
CHARGES [2]
59:23; 60:1
CHECKED [1]
2:17
CIRCUMSTANCE
S [1] 40:5
CLAIM [3]
11:10, 14; 61:6
CLAIMS [10]
24:21; 25:19;
33:18, 19;
34:13, 18; 36:4;
51:24; 52:1
CLAUSE [1]
40:9
CLEAR [3]
16:24; 29:12;
60:12
CLOSE [2]
11:11; 26:9
CLOSELY [1]
33:8
CLOSING [2]
16:17; 50:17
CLOSINGS [1]
56:20
CO-DEFENDANT
[1] 50:11

COLEMAN [4]
 6:8; 9:5; 10:13;
 42:3
COLLECT [1]
 53:12
COLLECTIVELY
 [2] 45:19; 46:6
COMES [4]
 12:22; 14:7;
 19:2; 41:15
COMMENCED [2]
 53:7, 22
COMMENT [2]
 47:8; 48:4
COMMENTS [2]
 17:4; 49:9
COMMITTED [1]
 50:1
COMMUNICATED
 [1] 9:8
COMMUNICATIO
N [2] 6:11;
 10:11
COMMUNICATIO
NS [1] 32:19
COMPARABLE
 [1] 22:25
COMPARED [1]
 22:14
COMPARING [1]
 20:21
COMPARISON
 [1] 34:6
COMPEL [6]
 37:10, 12, 14;
 38:2; 40:25;
 46:7
COMPLETELY
 [2] 28:4; 55:10
COMPOUNDS [1]
 59:7
COMPUTER [1]
 15:15
CONCEAL [1]
 48:12
CONCEDE [1]
 49:5
CONCEDED [4]
 5:20; 39:18;
 52:22; 59:1
CONCERNED [3]
 2:24; 35:6, 7
CONCERNS [3]
 8:16, 17; 27:1
CONDUCT [6]
 27:18; 47:12;
 54:23; 57:24;
 60:8, 13
CONDUCTED [3]
 54:9, 19; 55:12
CONFER [1]
 45:25
CONFERRING
 [4] 9:6; 31:5;
 36:17; 46:17
CONFIDENCE
 [1] 51:7
CONFIRM [1]
 5:13
CONFIRMATION
 [1] 9:18
CONFIRMED [1]
 53:24
CONFIRMING [1]
 50:12
CONFIRMS [1]
 12:6
CONFLICT [1]
 46:20
CONSCIENCE
 [1] 59:21
CONSENT [6]
 4:14, 21; 6:15;
 30:18; 58:16
CONSENTED [1]
 58:12
CONSERVATIVE
 [1] 25:25
CONSIDER [2]
 45:18; 47:1
CONSIDERATIO
N [2] 48:14;
 49:11
CONSIDERS [1]
 4:2
CONSTANTLY
 [1] 8:20
CONSTITUTE [1]
 21:18
CONSTITUTED
 [2] 16:17;
 50:19
CONSTITUTES
 [1] 57:16
CONSTITUTION
AL [2] 19:24;
 60:7
CONSTRUED [2]
 4:21; 50:15
CONTACT [6]
 15:4, 5; 17:9;
 18:4; 50:10, 15
CONTACTS [6]
 6:7; 12:15;
 13:15; 15:1;
 57:10, 14
CONTAINED [2]
 5:13; 14:20
CONTEST [2]
 39:9; 43:2
CONTESTED [2]
 38:23; 39:8
CONTESTING [2]
 39:1, 3
CONTINUANCE
 [1] 53:5
CONTINUED [2]
 61:2, 3
CONTRACTOR
 [2] 27:9; 42:6
CONTRACTOR'S
 [1] 42:21
CONTRADICT
 [3] 37:7, 19;
 44:24
CONTRADICTED
 [1] 43:18
CONTRIBUTED
 [1] 58:4
CONVENIENT [1]
 48:10
CONVERSATION
S [1] 16:25
CONVICTED [1]
 19:18
CONVICTION [2]
 53:8; 58:5
COPIES [1]
 18:17
CORNER [1] 8:6
CORPORATE [1]
 7:16
CORRECT [20]
 3:17; 4:6, 7;
 9:13; 13:24;
 14:2, 13, 23;
 15:5, 10, 19, 22;
 17:17; 19:3;
 20:19; 25:24;
 26:4; 44:2;
 53:1; 62:10
CORRECTED [1]
 44:1
CORRECTLY [2]
 23:1; 31:12
CORRESPONDE
NCE [5] 4:19;
 9:11, 12, 14, 16
COSTLY [1]
 60:14
COULD [24]
 5:15; 7:2, 23;
 8:24; 10:15;
 11:2; 24:4;
 25:2; 27:4, 16;
 28:1; 30:25;
 31:16; 34:24;
 37:23; 46:3, 25;
 54:22; 55:6;
 56:7, 23; 58:18,
 23; 61:21
COULDN'T [2]
 4:21; 5:4
COUNSEL [26]
 2:8; 3:21; 4:8,
 13; 5:15; 6:20;
 11:13; 13:3;
 17:4; 26:22;
 27:8; 28:18;
 31:5; 36:17;
 42:4, 5, 21;
 48:15, 16;
 53:16; 54:1, 2;
 55:5; 59:4
COUNSEL'S [1]
 29:9
COUNT [1]
 34:11

COUNTED [1] 33:1, 2; 34:19;
 34:14
COUNTRY [1] 35:17, 20, 25;
 17:4 36:13, 15, 18;
COUNTS [2] 37:11, 14; 38:2,
 49:19; 60:10 23; 40:9, 21,
COUPLE [1] 42:8, 10; 43:1,
 45:20 11, 13, 19;
COURSE [8] 44:1, 3, 18, 22;
 2:10; 3:3; 5:8, 45:2, 8, 10, 13,
 11; 6:9; 27:11; 15, 17, 20;
 28:17; 56:25 46:1, 4, 8, 14;
COURT [205] 47:2; 48:13;
 1:1, 25; 2:2, 10, 49:10, 16, 17;
 14, 16, 19, 22, 50:23; 52:20;
 24; 3:3, 18; 53:1; 54:4, 13;
 4:1, 5, 15, 17, 55:20; 57:1, 15,
 18, 25; 5:3, 10, 18, 21; 58:10,
 12; 6:5, 13, 19, 16; 59:2, 7, 22,
 21, 24; 7:1, 20, 24; 60:1, 4, 6,
 21; 8:6, 11, 25; 9, 13, 21;
 9:11, 14, 16; 61:22, 25; 62:3,
 10:1, 3, 6, 13, 5, 9, 14
 17, 19; 11:1, 5, **COURT'S** [5]
 8, 18, 21, 24; 21:22; 22:12;
 12:14, 25; 13:4, 39:22; 55:15;
 8, 10, 15, 18, 58:4
 23; 14:1, 10, **COURTROOM** [3]
 14, 18, 24; 2:8, 17; 4:23
 15:7, 11, 13, 17, **COVER** [2]
 20, 24; 16:3, 5, 14:15; 32:25
 8, 11, 22; **COVERED** [1]
 17:14, 18, 20, 31:18
 23; 18:2, 5, 8, **COVERTLY** [1]
 11, 13, 16, 22; 32:20
 19:9, 11, 16, 21; **CREATED** [1]
 20:22; 21:10, 51:22
 14, 20, 25; **CREDIT** [1]
 22:4, 6, 13, 18, 27:11
 25; 23:6, 15, **CRIMINAL** [5]
 17; 24:2, 14, 1:5; 2:6; 49:25;
 24; 25:5; 53:3; 58:4
 26:25; 27:1, 19, **CRITICAL** [2]
 22, 24; 28:1, 8, 12:23; 45:1
 15, 19, 24; **CROSS-EXAMIN**
 29:5, 8, 12; **E** [2] 23:12;
 30:1, 3, 8, 11, 56:8
 24; 31:1, 20; **CROSS-EXAMIN**
 32:3, 6, 8, 11, **ED** [1] 41:8
 13, 16, 23;

CROSS-POLLINATION [2] 21:7,
 10
CROSSED [1] 7:11
CURRENTLY [1] 3:23

- D -

DAMAGE [4] 5:22; 11:10, 14;
 56:6
DAMAGING [1] 17:1
DATA'S [1] 20:12
DCDOH [3] 27:3; 40:22;
 41:19
DEALING [1] 17:2
DECEMBER [7] 13:11; 14:2;
 40:13, 24;
 43:21; 53:8;
 61:2
DECIDE [1] 47:3
DECIDED [2] 4:4; 20:11
DECISION [2] 28:7; 47:10
DECLARATION [1] 38:6
DECLARATIONS [1] 38:16
DEFENDANT [38] 1:9, 19;
 4:18; 5:18; 6:2;
 31:5; 36:17;
 49:17, 21; 50:1,
 3, 6, 8, 10, 17,
 24; 51:14, 17,
 18, 21; 52:5;
 53:8, 10, 11, 16,
 19; 54:1, 8, 15;
 55:5; 57:8, 10;
 58:12, 22; 59:4,
 10, 11

DEFENDANT'S [12] 5:15;
 50:15; 52:19;
 53:3, 8; 54:5;
 56:17; 57:14;
 58:3, 5, 14;
 60:6
DEFENDANTS [1] 56:11
DEFENSE [25] 2:12, 25; 4:8,
 13, 17; 6:16,
 20; 8:16, 17;
 11:13; 16:25;
 22:16; 23:11;
 27:25; 28:3, 4,
 17; 29:17;
 31:5; 36:17;
 48:16; 51:5;
 55:3; 59:14, 18
DEFICIT [1] 42:11
DEFINITELY [1] 23:21
DEFRAUD [1] 50:20
DELAYED [1] 53:5
DELIBERATION [1] 43:10
DELIVERIES [1] 31:14
DELIVERY [4] 6:1; 53:22, 23
DEMONSTRATE **D** [2] 5:23;
 55:8
DENIED [3] 35:15; 54:13;
 60:17
DEPARTMENT [1] 40:15
DEPUTY [1] 2:17
DESCRIBES [1] 61:6
DESIGNED [1] 50:19
DESIRE [2] 12:6; 58:14

DESPITE [1] 10; 28:4;
 40:20
DESTROY [3] 37:25; 42:14;
 4:4; 53:11, 17
DESTROYED [8] 51:6; 56:1
 10:4, 21, 23;
 30:17; 32:1;
 53:22; 58:15,
 17
DESTRUCTION
 [12] 3:10, 22;
 9:22; 30:7;
 31:9; 32:20;
 50:25; 53:19,
 21; 58:10, 13;
 59:4
DETAIL [1]
 36:11
**DETERMINATIO
 N** [2] 57:21;
 59:25
DETERMINE [1]
 61:2
DETERMINED
 [3] 20:13, 15;
 50:4
DIALOGUE [1]
 4:8
DIDN'T [43]
 4:15, 17; 10:7;
 11:5, 8; 12:20;
 13:10; 14:15,
 18, 23, 25;
 15:4, 5, 7, 9, 13,
 17, 20; 18:11,
 12, 13, 18;
 20:8; 23:21;
 25:3, 6, 17, 20;
 27:15; 30:18;
 34:11; 35:19,
 21; 37:5; 39:2,
 12; 41:23;
 42:1, 14; 44:2,
 13
DIFFERENT [22]
 2:12; 6:22;
 12:15; 16:25;
 20:25; 21:21,
 23; 22:1, 3, 4,
 11; 23:5, 7, 9,
 10; 28:4;
 37:25; 42:14;
 51:6; 56:1
DIFFERENTLY
 [1] 39:7
DIFFICULT [2]
 41:19; 58:9
DIRECT [2]
 9:18; 12:10
DIRECTLY [5]
 7:4; 37:7, 19;
 43:18; 44:24
DISADVANTAGE
 [1] 59:12
DISAGREE [2]
 22:17, 19
DISASTER [1]
 23:20
DISAVOW [1]
 29:23
DISCHARGED
 [1] 54:1
DISCLOSE [2]
 52:12; 55:16
DISCLOSED [3]
 50:6; 51:4;
 55:3
DISCLOSURE [1]
 59:19
DISCLOSURES
 [2] 58:6; 59:20
DISCOVERED
 [3] 11:14; 55:6,
 23
DISCOVERY [6]
 49:4, 24; 53:6;
 54:6; 55:23;
 59:8
DISCREPANCY
 [2] 23:13; 56:5
DISCRETE [1]
 46:10
DISCRETION [1]
 60:13
DISCUSS [1]
 3:21
DISCUSSION [1]
 9:20
DISGUISE [1]
 48:12
DISMISS [17]
 3:7, 10, 12;
 31:16; 32:23;
 38:3, 15; 45:16,
 18; 46:5, 6;
 49:18; 50:9, 25;
 59:8; 60:15
DISMISSAL [1]
 37:16
DISMISSED [2]
 29:18; 49:21
DISMISSING [1]
 60:10
DISPARITY [1]
 55:23
DISPENSED [1]
 42:13
DISPENSING [8]
 27:2, 4, 7, 10;
 41:12, 22;
 42:12, 23
DISPUTE [5]
 30:20; 33:14,
 21; 35:14;
 39:17
DISPUTED [1]
 33:20
DISPUTES [1]
 24:7
DISPUTING [1]
 43:5
DISQUALIFY [1]
 46:6
DISTINCTLY [1]
 22:11
DISTRICT [4]
 1:1, 2, 13;
 61:18
DIVISION [1]
 1:2
DOCKET [2]
 34:2; 40:18
DOCTORS [2]
 6:2; 53:25
DOCUMENT [10]
 8:5; 34:3;
 35:11; 40:12;
 41:5; 44:9, 11,
 14, 21; 45:5
**DOCUMENTATIO
 N** [2] 7:1; 61:9
DOCUMENTS
 [37] 3:25; 4:2;
 6:17; 8:3; 9:1;
 10:21; 30:7, 19;
 31:9; 32:1, 3,
 22; 33:11, 14,
 16, 23; 35:20;
 37:1, 3, 6, 10,
 13, 15, 16, 18,
 19; 38:3, 7, 9,
 18; 39:11;
 40:11; 48:25;
 54:9, 18, 22, 25
DOESN'T [1]
 9:19
DOING [3] 19:1;
 23:21; 39:4
DOLLAR [3]
 11:19; 12:7;
 23:2
DOLLARS [5]
 24:16, 19, 20;
 25:12, 18
DOUBLE [1]
 43:7
**DOUBLE-COUNT
 ING** [18] 23:25;
 24:3; 27:14;
 34:1, 21, 22, 23;
 35:3, 6, 13, 16;
 38:8, 9, 12, 14;
 54:24; 55:1, 2
DOUBT [6]
 11:20; 18:10;
 23:4, 20, 24
DROPPED [1]
 18:22
DRUGS [12]
 11:19; 21:4;
 24:16, 19, 20;
 25:2, 13, 19, 21;
 26:7; 28:2;
 47:23
DUPLICATE [4]
 6:3; 33:18;
 34:13, 18
DURING [15]
 7:8; 12:10;

13:21; 27:6;
39:25; 40:13;
43:22; 47:23;
51:1; 53:17;
54:8; 56:24;
57:10; 58:11,
25

- E -

E-MAIL [13]
3:14; 6:10;
7:18; 9:7;
10:10; 12:5;
16:24; 17:6;
47:11; 50:11;
57:3, 8, 15
E-MAILS [1]
10:15
EARLIER [4]
20:19; 37:17,
22; 56:16
EARLY [1]
54:10
EDUCATION [2]
42:19; 43:5
EFFORT [2]
7:10; 27:16
EIGHT [1] 34:9
EITHER [3] 5:4;
18:14; 48:9
ELECTRICITY
[1] 8:19
ELOISE [1] 49:1
EMBARRASSED
[3] 8:10; 9:3;
39:5
EMBRACED [1]
39:18
EMMORTON [9]
21:15; 45:3;
47:9, 13; 48:1,
5; 54:18; 55:4,
18
EMPHASIZED [2]
56:19; 57:3
EMPLOYED [2]
47:19; 56:6
EMPLOYMENT
[1] 47:23

ENCOURAGED
[1] 48:15
ENDED [1] 39:4
ENGAGE [1]
39:2
ENGAGED [1]
54:5
ENOUGH [3]
10:22; 24:4;
42:14
ENTER [1] 60:9
ENTERTAIN [1]
61:25
ENTIRE [1] 14:4
EQUAL [1]
59:13
ERROR [8]
26:15, 16, 17,
18; 28:22;
52:23; 55:1
ERRORS [16]
34:1, 21, 22, 24;
35:13, 16; 38:8,
9, 12, 14; 43:7;
49:8; 54:24;
55:2; 59:10
ESPECIALLY [1]
58:25
ESQUIRE [3]
1:17, 20, 21
EVALUATION [1]
56:15
EVENT [1]
60:12
EVENTUALLY
[6] 4:12; 5:20;
14:21; 21:22;
43:3; 59:1
EVERY [5]
23:24; 26:15,
16; 28:12
EVERYBODY [5]
7:23, 25; 8:15;
42:20; 49:3
EVERYONE [3]
2:2, 22; 24:2
EVERYTHING [6]
15:3; 22:9;
26:22; 32:15;
46:25; 49:11

EVIDENCE [56]
3:11, 22; 4:1, 2,
5; 5:7, 12; 7:9,
22; 16:18, 19;
19:17; 20:13;
21:17; 27:17;
28:9; 30:17;
31:2; 34:19, 23;
39:15, 19, 20;
40:6; 42:9;
49:23; 50:3, 5,
19; 51:1, 3, 4,
12; 52:17, 19;
53:2, 11, 12, 13,
20; 54:16;
56:17; 58:1, 2,
4, 11, 17; 60:2,
3
EVISCERATE [1]
37:23
EVISCERATED
[3] 11:9, 10, 14
EVOLUTION [1]
48:9
EVOLVING [3]
27:12; 42:18;
43:5
EXACT [1]
14:20
EXACTLY [4]
10:25; 19:3;
21:8, 13
EXAMINATION
[1] 12:10
EXAMPLE [1]
21:2
EXCLUDE [1]
44:18
EXCLUDED [1]
34:13
EXCULPATORY
[11] 3:11; 11:3;
31:13, 18;
32:22, 24;
43:18; 44:21;
51:1, 16
EXCUSE [3]
36:13, 15;
58:22

EXECUTIVE [1]
60:5
EXERCISE [1]
60:12
EXHIBIT [9]
34:2; 36:2, 7, 8;
40:18; 44:6, 25;
45:1, 3
EXHIBITS [11]
33:15, 22; 36:3,
12, 21, 22, 24;
37:1, 17; 44:16
EXISTED [3]
33:25; 35:2, 3
EXISTENCE [1]
50:7
EXPEDITIOUSLY
[1] 31:8
EXPENDING [1]
30:14
EXPENSIVE [1]
34:9
EXPERT [4]
11:6; 48:19;
50:4; 56:6
EXPERT'S [1]
44:23
EXPERTS [6]
20:4, 9, 18;
37:6; 54:10;
55:16
EXPLAIN [3]
4:10; 16:20;
42:18
EXPLAINING [1]
38:6
EXPLANATION
[2] 41:21, 22
EXPLOITED [1]
41:9
EXPOSED [1]
58:1
EXPRESSED [1]
35:12
EXTENSION [2]
54:3, 5
EXTENSIVE [2]
54:5; 60:14
EXTENT [2]
45:15; 46:4

**EXTRAORDINAR
Y** [1] 40:4

- F -

FACILITIES [2]

21:15, 16

FACILITY [2]

7:12, 13

FACTS [10]

19:13, 14, 16;

29:13; 31:24;

38:15, 20;

39:10, 12

FACTUALLY [1]

30:23

FAILED [3]

39:17; 52:12;

55:15

FAILURE [3]

49:23; 50:15;

59:19

FAIREST [1]

26:23

FAITH [11]

6:12, 14; 11:1;

31:10, 17; 39:2,

8; 43:17; 44:4;

45:4; 48:23

FALSE [34]

3:12; 15:21, 24,

25; 16:1, 13;

24:8; 31:3;

33:7, 8, 13;

36:3, 7, 9, 22;

37:1, 7, 19;

38:21; 39:15;

40:6; 44:1, 24;

45:3, 4; 50:10;

57:2, 4, 5, 12,

19, 25; 59:20

FALSELY [1]

12:3

FALSITY [1]

23:17

FAMILIAR [1]

51:25

FAULT [1] 48:9

FAVORABLE [3]

49:23; 50:3;

59:18

FEBRUARY [6]

6:11; 9:7; 10:6;

14:12; 18:24;

53:15

FEDERAL [5]

2:9; 5:3; 12:17;

49:25; 58:23

FEELS [1]

23:22

FERRET [1]

49:7

FERRETED [1]

20:1

FEWER [1] 44:7

FIFTH [2] 40:8;

60:7

FIGURE [4]

20:10, 23, 25;

41:15

FIGURES [7]

20:6, 16; 22:10;

23:1; 24:13;

53:6; 55:4

FILED [13] 3:5;

9:5; 12:2;

29:21; 37:10;

45:17; 46:10,

12; 50:8, 24;

53:9; 54:12;

60:16

FILES [2]

33:19; 48:16

FILING [2]

40:21; 44:5

FILINGS [1]

60:24

FILLED [3]

4:25; 5:15;

58:19

FINAL [1] 47:20

FINALLY [1]

56:10

FINDING [4]

26:15; 31:17;

44:12; 57:16

FINDINGS [1]

44:24

FINDS [4] 11:1;

53:1; 55:20;

60:6

FINISH [2]

24:1; 29:24

FIRST [19]

3:21; 10:15;

11:4; 25:16;

27:5; 29:1;

33:15, 25; 34:3,

8, 13, 14; 40:1,

2, 7; 41:8;

42:15; 43:22;

50:4

FLAWED [1]

23:10

FLAWS [3]

5:21; 59:3

FLOORED [3]

43:6, 7

FLURRY [3]

3:2; 27:6;

41:13

FOCUSED [1]

36:12

FOCUSING [1]

47:15

FOLKS [3]

20:22, 24; 24:3

FOLLOWED [1]

35:14

FOLLOWING [1]

33:15

FOOTING [2]

5:19; 59:13

FOREGOING [1]

62:10

FORENSIC [1]

11:6

FOREVER [1]

6:2

FORGET [1]

21:22

FORMATTING

[1] 20:9

FORMULA [3]

56:1, 14; 59:10

FORMULATION

[4] 20:8; 22:14,

15

FORWARD [2]

28:6; 31:2

FOUND [9]

27:8; 30:17;

34:8, 10; 42:21;

46:20; 51:8;

58:23

FRANKLY [2]

26:5; 42:22

FRAUD [7]

47:15; 48:2;

51:21; 53:4;

56:24; 58:7;

60:2

FRAUDULENT

[3] 27:18;

54:20; 56:17

FRIEND [2]

4:20; 53:13

FRONT [5] 9:7;

13:14; 22:8;

23:18; 48:17

FUDGE [1] 44:8

FULLY [3]

31:21; 32:18;

49:20

FURTHER [6]

32:25; 50:19;

54:17, 22; 56:7;

59:7

FURTHERMORE

[1] 60:4

- G -

GENEROUS [1]

9:1

GENTLEMAN [1]

19:18

GEORGE [1]

1:12

GETTING [1]

35:1

GIVEN [2]

29:24; 41:17

GIVING [2]

24:22; 26:1

GOING [20]

3:18; 5:22; 6:8;

7:18; 11:24;

17:5, 6, 7;
21:14; 24:24,
25; 30:4, 12;
46:9; 48:2, 4;
49:10, 11; 61:3,
25

GOTTEN [1]

9:18

GOVERNMENT

[106] 3:15, 19,
24, 25; 4:4, 13;
5:4, 7, 21; 7:12;
9:17; 10:22;
11:15; 12:11,
13; 16:11, 14;
17:2; 19:19, 25;
20:6, 8, 11, 15;
23:23; 28:10,
12; 29:21;
30:10, 11; 31:1,
22, 25; 33:11,
14; 34:5; 36:5,
7, 8, 21; 37:13;
38:14; 39:15;
40:5; 41:5;
43:19; 44:17;
46:7; 49:8;
50:1, 2, 9, 14,
16, 22; 51:2,
19, 20; 52:2, 6,
7, 9, 11, 12, 16,
18, 22; 53:1, 7,
10, 16, 18;
54:4, 11, 12, 15,
20, 24, 25;
55:7, 11, 15, 24;
56:18, 24; 57:2,
3, 6, 7, 13, 20,
24; 58:11, 13,
15, 23; 59:1, 2,
9, 13, 17; 60:5,
8; 62:3

GOVERNMENT'S

[25] 7:5; 8:16;
11:10, 12; 20:4;
29:9; 30:14, 16,
22; 31:23;
37:24; 44:16,
25; 49:23, 24;
50:4, 25; 52:22;

54:17; 55:9, 12,
22; 58:7, 21

GRABBED [3]

7:21, 23, 24

GRADUALLY [1]

25:10

GRANTED [4]

37:11, 14; 38:2;
54:4

GRANTING [1]

40:25

GREAT [3] 5:3;

55:7, 21

GREENBERG

[28] 1:21; 2:16;

28:25; 29:10;

30:1, 2, 4, 21,

25; 31:6;

32:17; 33:3;

35:10, 18, 23;

36:1, 15, 19, 20;

38:23; 39:9;

43:13, 15; 45:9,

11, 14; 46:3, 13

GROUND [3]

11:25; 31:17;

32:24

GROUNDS [4]

29:16; 49:22;

50:9; 60:15

GUESS [4]

14:21; 25:23;

29:1; 59:14

GUILT [1] 59:25**GUILTY** [2]

61:12, 14

GURUVAREDDY

[1] 21:18

- H -

HADN'T [1]

14:11

HAMMOND [12]

20:12, 16; 23:3,

12; 25:14, 23;

26:2; 27:15;

41:8; 42:17, 19;

48:12

HAMMOND'S [2]

24:6, 15

HANDFUL [1]

28:2

HANDLING [1]

28:25

HANDS [2]

40:14, 20

HAPPEN [2]

24:4; 40:10

HAPPENED [16]

10:25; 19:4;

21:8; 23:18;

24:4, 21; 25:19,

20; 28:21;

38:7; 39:6;

40:8; 41:7;

42:1; 43:8;

49:4

HAPPENING [2]

9:4; 39:5

HARDEST [1]

19:7

HAVEN'T [3]

31:25; 35:15;

46:11

HAVING [11]

4:19; 8:16;

9:20; 21:9;

23:22; 39:15;

40:20; 48:7;

53:13, 15;

58:22

HAYSTACK [1]

59:15

HEADQUARTER

S [1] 7:16

HEALTH [1]

40:15

HEALTHCARE

[2] 51:24, 25

HEARD [5]

12:14; 25:2;

49:11; 53:15;

61:21

HEARING [7]

1:11; 3:2;

46:18; 50:24;

60:14; 61:2, 4

HEART [8] 6:14;

7:2, 4; 9:3;

17:12; 25:24;

31:13; 36:6

HELPFUL [1]

22:16

HERE'S [1]

49:10

HEREBY [1]

62:10

HEREINAFTER

[1] 51:23

HERSELF [1]

16:12

HESITANT [1]

60:4

HIGH-DOLLAR

[1] 50:13

HIGHER [1]

20:18

HIGHLIGHTED

[4] 16:15, 17;

57:6; 58:3

HINDSIGHT [4]

23:19; 27:11,

13; 49:6

HINGER [1]

2:18

HIRED [4]

47:16, 22; 48:3;

54:2

HISTORY [2]

3:23; 59:20

HOLDING [1]

60:25

HONED [1] 18:6**HONOR** [85]

3:17; 4:7, 11,

24; 5:9; 6:6,

13; 7:15, 24;

8:10, 13, 24;

9:25; 10:10, 16,

25; 11:7, 17;

12:9, 21; 13:13,

17; 14:9;

15:23; 16:2, 20;

18:7; 19:4, 6,

10; 20:20;

21:2; 22:10, 20;

23:5, 14, 23;

24:5, 10; 25:1,
16; 26:13;
28:5; 29:7;
30:4, 21; 31:6,
11, 16; 32:17;
33:22; 35:10,
23; 36:1, 20,
23; 37:18, 22;
39:9; 40:11;
41:15; 42:18,
22; 43:7; 44:9,
23; 45:11, 14;
46:15, 16, 19;
47:1, 6, 8;
48:11; 49:14;
60:19; 61:16,
17, 19, 24; 62:1
HONOR'S [5]
2:17; 15:5;
29:3, 23; 46:23
HONORABLE [1]
1:12
HOSPITAL [1]
46:22
HOURS [1] 3:3
HOUSE [1] 5:7
HOWEVER [4]
24:10; 31:20;
52:21; 60:5
HUMAN [1]
28:22
HUNDRED [2]
26:8; 38:17

- I -

IDENTIFIED [5]
35:12; 37:17;
52:6; 53:25;
54:10
IDENTIFY [2]
6:1; 51:15
IGNORE [1]
44:22
IGNORED [1]
35:8
IMMEDIATELY
[1] 55:23

IMMIGRATION
[5] 60:23; 61:4,
18, 21; 62:2
IMPEACHES [1]
51:12
IMPORTANT [2]
23:18; 43:16
IMPORTANTLY
[1] 57:20
IMPOSSIBLE [1]
58:9
IMPROPER [1]
58:1
IMPUTED [1]
51:10
IN-AND-OUT [1]
23:10
INCIDENT [1]
57:19
INCLINED [4]
29:23; 31:20;
32:23; 45:16
INCLUDE [1]
37:15
INCLUDED [1]
60:2
INCLUDING [4]
34:8; 49:22;
55:17; 60:8
INCONSISTENCIE
S [1] 56:11
INCORRECT [2]
15:22, 24
INCORRECTLY
[1] 10:20
INCREDIBLE [1]
58:23
INDIA [1] 29:4
INDICATE [2]
8:6; 10:11
INDICATED [14]
3:1; 4:18; 6:11;
7:11, 17; 9:8;
20:19; 30:13,
14, 16; 53:12,
18; 56:16, 18
INDICATES [1]
12:22
INDICTMENT [5]
3:7; 29:17;

49:19, 21;
60:11
INDIVIDUAL [3]
21:12; 52:13,
14
INDIVIDUALS [2]
51:22; 52:7
INFLATED [1]
34:1
INFORMATION
[18] 5:16, 17;
8:11; 11:2, 13;
36:10; 39:25;
43:18; 51:16,
20; 52:13, 16;
54:9, 14; 56:4,
10, 21
INITIAL [2] 3:7;
29:14
INITIALLY [1]
52:20
INNOCENCE [1]
59:25
INNOCENT [1]
61:11
INQUIRY [1]
29:9
INSTEAD [1]
34:18
INSTRUCT [1]
16:15
INSTRUCTION
[2] 50:18; 57:5
INSURANCE [2]
36:5; 51:21
INTEND [1]
29:20
INTENDED [5]
4:19; 12:21;
48:12; 52:2;
61:14
INTENT [8]
50:20; 52:19;
53:3, 11, 17;
56:18; 57:22;
58:4
INTENTIONAL
[5] 15:25; 16:9;
30:7; 32:20;
43:17

INTENTIONALLY
[1] 44:10
INTENTIONS [1]
46:24
INTERESTED [4]
19:12, 13, 16
INTERNAL [15]
11:12; 20:12;
22:2, 15; 36:25;
37:6, 9; 40:17;
44:11; 52:8, 17;
54:17; 55:22;
56:8, 15
INTERRUPT [1]
36:18
INTRODUCED
[1] 41:21
INVADE [1]
60:4
INVENTORY [7]
21:18; 49:2;
52:3; 55:5, 12,
14, 17
INVESTED [1]
27:16
INVESTIGATION
[4] 2:9; 12:18;
25:12; 54:6
INVESTIGATIVE
[1] 51:10
INVESTIGATOR
[1] 61:10
INVITED [1]
48:15
INVOLVED [1]
33:7
IRONIC [2]
23:23; 27:11
IRONICALLY [4]
12:12; 17:2, 8;
26:9
IRONY [2]
16:23; 26:1
IRRESPONSIBLE
[1] 58:24
ISN'T [1] 7:9
ISSUE [16]
5:25; 17:2;
20:2; 27:2;
29:22; 31:6, 8,

9, 15; 35:3, 14;
41:9, 25; 46:18;
50:23; 61:21

ISSUES [10]
4:5, 9; 20:1;
21:22; 31:22;
33:4; 40:7;
45:12, 24; 59:7
ITEMS [11]
3:25; 4:2; 7:15,
18; 53:17, 22;
58:14, 20, 22,
24

- J -

JACQUELINE [3]
1:24; 62:9, 14
JAMES [1] 2:11
JANUARY [9]
4:20; 9:13, 15;
10:3; 13:11;
14:2; 24:17;
52:6; 53:14
JIGAR [4] 12:4;
30:6; 50:11;
57:3
JOSHUA [1]
1:21
JUDGE [3]
1:13; 2:4; 28:7
JUSTIFY [1]
27:10

- K -

KELLY [2] 25:9;
26:8
KELLY'S [1]
25:15
KNOWING [3]
6:8; 34:16;
56:5
KNOWINGLY [1]
57:17
KNOWLEDGE [2]
41:10; 51:9
KNOWN [1] 55:6

KNOWS [2]
32:13; 36:23

- L -

LACKING [1]
42:25
LACKS [1]
51:12
LANGUISHING
[1] 60:25
LARGER [1]
34:10
LATER [5] 3:19;
40:23; 42:1, 3;
47:9
LATEST [1]
57:25
LATING [5] 2:9;
12:12; 16:12;
17:11; 19:7
LATING'S [2]
12:14; 26:17
LAWYER [5]
4:19; 9:18;
56:5; 60:23;
61:4
LEARNED [1]
39:25
LEAST [3] 7:5;
57:23; 58:15
LEAVE [2] 6:13;
46:23
LENGTH [1]
60:24
LENGTHY [2]
54:2; 55:14
LET'S [1] 30:24
LETTERS [1]
61:10
LEVEL [1]
36:11
LIKELY [1]
56:22
LIMIT [1] 39:19
LIMITED [2]
49:22; 55:17
LITERALLY [1]
8:25

LITIGATED [1]
39:23
LITTLE [4]
2:24; 3:19;
45:6; 52:24
LOADED [3]
15:3; 17:12, 16
LOCATED [1]
5:5
LOCATION [1]
54:18
LOOKED [12]
14:25; 15:12,
15; 16:6, 18;
17:11, 14; 19:5;
21:1; 23:22;
47:21; 51:18
LOOKING [10]
14:20; 17:20,
21; 18:5, 9, 10;
23:19; 29:18;
35:16; 47:11
LOSSES [9]
20:18; 22:23;
45:3; 51:20;
55:21, 25; 56:1,
5; 59:12
LOWER [1]
54:16

- M -

MAINTAIN [2]
8:24; 28:11
MAINTAINED [1]
38:11
MAINTAINS [1]
12:18
MAKES [3]
57:15, 21;
59:24
MAKING [1]
47:10
MANDATES [1]
51:8
MARCH [4]
10:4; 14:5;
22:23; 53:21
MARYLAND [1]
1:2

MASSIVE [5]
26:19; 45:3;
48:24
MASTER [1]
53:23
MATERIAL [10]
22:20; 31:3;
40:7; 50:5, 20;
51:3; 53:2;
55:16; 57:6;
58:2
MATERIALITY
[1] 51:13
MATERIALS [6]
4:9, 10; 6:7;
8:8; 51:13, 15
MATTER [5]
2:5; 3:23;
31:21; 60:19;
62:11
MATTERS [2]
54:7; 60:14
MAYBE [5]
20:7; 35:1, 23;
41:5, 25
MEDIC [29]
20:2, 3, 9, 18,
22, 24; 21:24;
22:8, 14, 15, 22;
23:8; 24:3;
26:6; 34:5, 10,
11, 12; 44:24;
47:12; 48:7;
51:23; 54:10,
22; 55:4, 16,
17, 20; 56:13
MEDICAID [5]
21:4; 26:7;
27:5; 36:5;
42:7
MEDICARE [5]
21:3, 4, 6, 9;
26:6
MEDICARE'S [1]
21:1
MEDICATION [2]
5:14; 7:3
MEDICATIONS
[7] 12:7; 31:14;

34:7, 9; 50:13;
53:24; 58:18
MEETINGS [1]
61:10
MENTIONED [1]
29:19
MERELY [1]
51:12
**METHODOLOGIE
S** [1] 23:4
METHODOLOGY
[7] 20:25;
21:23; 23:6, 7,
8, 10, 11
MIGHT [3] 8:6;
37:24; 48:22
MILLION [10]
11:19; 20:17;
23:2; 24:16, 19,
20; 25:12, 18;
52:21, 24
MINUTE [1]
28:12
MINUTES [1]
57:15
MISLED [1]
58:2
**MISREPRESENT
ATION** [1] 44:3
MISSED [1]
42:15
MISSING [1]
14:8
MISTAKE [6]
36:2, 24; 37:2;
38:4; 40:12;
44:15
MISTAKES [6]
6:22; 19:25;
26:19; 28:6, 22;
39:4
**MISUNDERSTAN
DING** [1] 29:3
MODIFIED [1]
43:21
MOMENT [2]
36:13; 43:5
MONEY [1]
42:23

MONTH [10]
24:24, 25; 25:9,
17; 55:12
MONTHS [5]
25:21; 28:16;
34:4; 43:25;
49:2
MORNING [5]
2:2, 4, 15, 22;
49:12
MOSELY [1]
26:18
MOTION [39]
3:7, 9, 11, 24;
5:17, 20; 7:9;
9:5; 12:1;
19:19; 29:15;
30:8; 33:16, 22;
34:2; 37:10, 11,
14; 38:2, 3, 15;
39:19, 23;
40:18, 25;
45:16; 49:18,
20; 50:9, 24;
51:1, 2; 53:9;
54:3, 12; 58:11,
25; 60:15;
61:15
MOTIONS [14]
1:11; 2:13; 3:2;
29:14, 15, 24;
30:5; 45:18;
46:6, 11; 59:8;
60:16, 17
MOVING [1]
43:9
MULTIPLE [2]
30:21; 33:19
MYSELF [1]
46:20

NAMES [1] 52:7
NATURAL [1]
48:9
NEARLY [1]
55:7
NECESSARILY
[1] 11:5

NECESSARY [1]
29:6
NEEDED [4]
17:24; 33:17;
43:14; 46:19
NEEDS [1]
54:23
NEGATIVE [1]
19:2
NEGLIGENT [1]
57:23
NEVER [10]
17:14; 18:19;
31:19; 35:13;
38:11; 41:12;
42:7; 55:3;
57:8; 58:12
NEVERTHELESS
[3] 52:25; 56:1;
57:18
NIGHT [1] 42:17
NOBODY [4]
2:25; 14:21;
17:14; 24:7
NORTHERN [1]
1:2
NOTED [4]
7:20; 24:14;
31:12; 41:3
NOTES [4] 6:1;
34:20; 35:4;
47:11
NOTHING [4]
14:19; 34:17;
35:15; 38:9
NOTICE [8]
10:6; 30:8;
32:21; 48:11;
53:10, 16, 19;
56:11
NOTION [1]
38:4
NUMBER [17]
2:6; 6:22;
12:13, 14; 13:3,
6, 15, 16, 18,
19, 20; 21:25;
24:22; 25:4;
34:2; 40:19;
50:21

NUMBERS [8]
12:23, 25; 13:1;
15:4; 19:1;
24:22; 44:8;
52:25

- O -

OBFUSCATED
[1] 44:6
OBJECT [1]
53:19
OBJECTED [2]
30:18, 19
OBJECTION [3]
9:9, 22; 10:20
OBLIGATED [1]
59:17
OBLIGATIONS
[1] 49:24
OBSERVE [1]
14:23
OBVIOUSLY [5]
6:8, 23; 7:15;
9:3; 28:7
OCCUPIED [1]
28:15
OCTOBER [9]
24:15, 18;
33:11; 37:12,
15; 38:19;
40:13, 22;
43:25
OFFICE [13]
2:7; 5:5, 6;
21:19; 33:10;
35:11; 40:18;
42:19; 43:10;
44:12, 21; 52:9
OFFICIAL [3]
1:25; 62:9, 14
OPENING [1]
56:19
OPENLY [1]
39:24
OPERATED [1]
59:12
OPINION [2]
55:15; 58:5

- OPINIONS** [3]
52:13; 55:20;
61:9
- OPPORTUNITY**
[6] 3:6, 9, 15;
5:16; 29:24;
32:18
- OPPOSED** [3]
24:24, 25;
61:18
- OPPOSITE** [1]
45:5
- ORANGES** [1]
20:21
- ORDER** [3] 4:5;
58:16; 60:10
- ORDERED** [3]
58:19; 61:17,
19
- ORIGINAL** [2]
55:13; 59:6
- ORIGINALLY** [2]
4:11; 20:5
- OTHER** [19]
3:25; 4:2; 5:6;
7:11, 15; 27:4;
29:16; 35:17,
18; 36:5; 41:3;
48:18; 53:4;
54:6; 55:4;
60:15, 16, 17;
61:8
- OTHERS** [2]
9:2; 37:11
- OTHERWISE** [3]
15:25; 20:8;
28:9
- OUTCOME** [2]
51:7; 56:23
- OUTSIDE** [1]
27:18
- OVERCOME** [1]
28:6
- OVERSTATE** [1]
8:13
- OWNERS** [1]
7:12
- PAMPHLET** [1]
41:11
- PAPER** [3] 32:4,
6, 9
- PAPERS** [4]
7:12; 41:3;
42:10; 47:17
- PARALEGAL** [1]
2:18
- PARDON** [1]
13:17
- PARTICULAR** [1]
11:25
- PARTICULARLY**
[1] 8:4
- PARTIES** [3]
54:5; 56:12;
60:25
- PARTS** [2] 43:9;
46:10
- PASCALE** [2]
1:17; 2:7
- PASCALE'S** [1]
26:18
- PATEL** [9] 12:4,
5; 17:1, 10;
30:6; 50:12, 15;
57:3, 9
- PATEL'S** [4]
12:24; 13:16;
57:14; 60:23
- PATERNITY** [1]
46:23
- PATIENT** [1] 7:3
- PATIENTS** [3]
6:1; 53:24;
58:19
- PAUSE** [3]
36:14; 46:2;
47:7
- PAYMENT** [1]
36:10
- PECULIAR** [1]
18:23
- PENDENCY** [4]
7:9; 51:1;
58:11, 25
- PENDING** [6]
3:24; 30:8;
46:8; 49:17;
59:24; 60:1
- PENNSYLVANIA**
[1] 61:1
- PERCENT** [1]
38:17
- PERFECT** [1]
2:22
- PERHAPS** [1]
25:15
- PERIOD** [4]
7:25; 41:18;
47:13; 55:14
- PERJURED** [1]
16:12
- PERJURY** [2]
16:12; 57:17
- PERMITTED** [1]
48:15
- PERSONAL** [1]
19:9
- PERSONALLY**
[5] 6:10; 33:6;
61:11, 13
- PERSUASIVE** [1]
30:13
- PHARMACARE**
[12] 36:4;
40:16, 23;
41:14, 17; 42:7;
44:13; 47:13,
19; 52:4, 15;
54:18
- PHARMACIES**
[4] 21:8, 10, 12;
51:24
- PHARMACIST**
[1] 45:2
- PHARMACY** [3]
26:5; 52:15;
55:18
- PHONE** [24]
10:8; 12:4, 13,
16, 23; 13:16,
21; 14:11;
15:4; 17:8, 9,
11; 18:5, 23,
24; 29:5; 30:5;
31:3, 9; 46:18;
57:9, 10, 14, 15
- PICKING** [1]
10:8
- PICTURE** [1]
26:23
- PILLS** [12]
7:14; 21:11;
34:12; 40:16,
22; 42:10;
43:22; 44:2, 7,
13; 52:3, 4
- PLACE** [4] 3:5;
25:16; 58:23;
60:22
- PLACED** [1]
5:18
- PLEADINGS** [2]
3:4; 61:9
- PLEASE** [1]
45:17
- PLUMTREE** [1]
21:15
- PODIUM** [1]
30:2
- POINT** [22]
5:23; 7:6, 18;
10:17, 19;
14:14, 22;
18:19; 20:15;
21:1, 25; 24:6;
26:14; 29:2;
31:11; 33:20;
39:10, 18; 46:3;
56:19; 57:21;
61:22
- POINTED** [4]
16:18; 37:22;
44:23; 50:16
- POINTS** [1]
3:19
- PORTION** [1]
28:15
- PORTRAYED** [1]
55:7
- POSITION** [1]
59:5
- POSSESSED** [3]
52:4; 55:16;
59:11

POSSESSION [4]
 14:15; 42:9;
 50:2; 54:15
POSSIBILITY [6]
 7:7, 8; 55:1, 2;
 56:23; 59:9
POSSIBLY [1]
 5:2
POST-TRIAL [2]
 55:9; 59:8
POTENTIALLY
 [2] 11:2; 34:24
POWER [2]
 61:16, 20
POWERFUL [2]
 25:7; 28:9
PRACTICES [1]
 27:24
PRECISELY [1]
 39:3
PREJUDICE [5]
 37:16; 39:14;
 40:3; 49:19;
 60:11
PRELIMINARY
 [1] 51:20
PREPARATION
 [2] 33:7, 8
PREPARED [7]
 33:9; 34:3;
 35:11; 37:6;
 40:17; 44:12;
 49:13
PRESCRIBED [2]
 6:2; 52:4
PRESCRIPTION
 [4] 4:4; 5:14,
 25; 28:2
PRESCRIPTION
S [2] 8:23;
 53:25
PRESENT [4]
 2:16; 26:23;
 54:2
PRESENTATION
 [1] 52:22
PRESENTED
 [19] 3:12;
 11:16, 22; 24:8;
 28:3; 36:3, 22;
 37:8, 20; 39:15;
 50:10; 52:18,
 25; 54:16;
 56:2; 58:7;
 60:2, 3
PRESENTING [3]
 33:13; 38:21;
 40:6
PRESERVED [2]
 7:9; 58:17
PRESSURES [1]
 49:2
PRETRIAL [3]
 13:24; 54:15;
 59:10
PRETTY [1]
 46:20
PREVAILED [1]
 58:17
PREVIOUS [3]
 20:4; 52:10;
 53:18
PREVIOUSLY [1]
 58:1
PRIMARY [1]
 18:13
PRINTOUT [1]
 12:22
PRIOR [5]
 12:11; 18:24;
 47:16, 18, 21
PRISON [5]
 19:20, 21, 22,
 23; 61:1
PROBABILITY
 [3] 51:4, 6
PROBABLY [1]
 42:5
PROBLEM [9]
 6:21; 8:14;
 9:19; 14:6;
 24:12; 34:24;
 35:1, 2; 43:15
PROBLEMS [2]
 24:1; 39:21
PROCEDURAL
 [1] 3:23
PROCEDURE [1]
 49:25
PROCEDURES
 [1] 51:25
PROCEED [1]
 32:25
PROCEEDING
 [2] 3:20; 56:14
PROCEEDINGS
 [4] 2:1; 51:5;
 62:6, 10
PROCESS [5]
 9:9; 19:24;
 28:13; 40:9;
 60:7
PRODUCE [1]
 29:6
PRODUCED [15]
 33:11; 37:3, 9,
 11, 13, 14, 23;
 38:2, 18; 40:12,
 23; 41:14;
 43:22, 24;
 51:19
PRODUCING [2]
 36:25; 43:20
PRODUCTION
 [1] 53:6
PROFIT [2]
 39:15; 40:5
PROGRAM [3]
 42:9, 15, 20
PROGRAMS [3]
 36:5; 51:21;
 54:12
PROJECTED [1]
 52:21
PROMOTED [5]
 20:16; 22:1;
 56:24; 57:2, 19
PROMOTION [2]
 57:25; 59:20
PROOF [1]
 28:11
PROPER [1]
 58:6
PROPOSED [2]
 11:15; 58:14
PROSECUTION
 [3] 35:5; 46:7;
 57:18
PROSECUTOR
 [3] 28:13;
 34:18; 51:10
PROSECUTOR'S
 [4] 36:6; 39:22;
 51:9, 11
PROSECUTORS
 [24] 33:6, 12,
 17, 24; 34:11,
 17; 36:3, 11,
 25; 37:5, 9;
 38:1, 20; 39:17,
 19, 24; 40:2, 6,
 8, 14, 21, 23;
 44:11, 20
PROVE [3]
 17:5, 6; 40:2
PROVEN [1]
 58:18
PROVIDE [1]
 52:16
PROVIDED [7]
 6:7; 20:13;
 29:5; 53:10, 16;
 56:11, 12
PROVIDER [3]
 14:7, 10; 18:20
PROVINCE [1]
 60:5
PUNCH [1]
 27:14
PURCHASED [1]
 11:20
PURPOSE [1]
 47:20
PURPOSES [1]
 3:1
PUTTING [1]
 24:13

- Q -

QUASH [1]
 54:12
QUESTION [8]
 20:3; 21:23;
 29:1; 32:2;
 41:1; 43:14;
 46:17; 48:20

QUESTIONED

[1] 50:23

QUESTIONS [4]

45:12; 48:17;

60:18; 61:5

QUITE [1] 26:9

- R -

RAISE [1] 62:2**RAISED** [5]

13:3; 31:22;

35:14; 41:9;

46:18

RATHER [1]

31:23

READING [1]

38:24

REALIZED [2]

5:21; 59:3

REALLY [1]

23:25

REAMS [1] 32:9**REASON** [4]

4:3; 20:7; 25:1;

61:14

REASONABLE

[4] 51:3, 6, 18;

56:4

REASONABLY

[1] 4:21

REBUTTAL [2]

16:18; 56:20

RECALL [5]

10:10, 14; 23:1;

32:12; 41:7

RECEIPT [3]

5:14; 7:3

RECEIVE [2]

12:2; 44:14

RECEIVED [8]

17:5; 18:17;

44:14; 50:18;

53:24; 54:14;

58:16, 18

RECENTLY [2]

57:1, 13

RECESS [1]

49:15

RECKLESS [4]

33:12; 35:16;

38:20; 39:10

RECKLESSLY

[1] 40:6

RECOGNIZES

[2] 59:2; 60:1

RECOLLECTION

[2] 22:12; 43:4

RECONCILED

[1] 38:3

RECORD [10]

12:9, 18; 16:24;

19:15; 29:13,

25; 35:10;

38:13; 60:12;

62:10

RECORDS [39]

12:4, 13, 16, 23;

13:10, 23;

14:15, 19, 21,

25; 15:7, 10,

13, 16, 17;

16:6; 17:8, 12,

19, 21; 18:5,

10, 16, 24;

27:5, 9; 29:5, 6;

41:13, 16, 23;

42:6, 13, 22, 25;

43:1; 55:5;

57:9, 12

REDDY [3] 1:7;

2:5; 49:17

REDUCED [1]

52:23

REFILL [1]

31:12

REFLECTED [1]

47:25

REGARD [3]

7:14; 20:2;

45:21

REGARDING [7]

3:22; 7:6; 25:6;

29:13; 30:5;

52:13; 56:8

REGARDLESS

[1] 51:10

REIMBURSED

[2] 21:3

REIMBURSEMEN**T** [1] 51:25**RELATED** [16]

12:3, 15; 20:3,

4; 50:3, 10;

51:20, 25; 53:6;

54:6, 9; 57:2,

22, 24; 59:12;

60:1

RELATING [1]

31:3

RELATIONSHIP

[1] 26:22

RELEVANCE [1]

51:13

RELEVANT [4]

8:5; 56:12;

57:11; 58:2

REMEMBER [6]

8:7; 22:9, 10;

23:19; 42:4, 5

REMOVE [2]

33:18; 34:17

REMOVED [1]

61:3

REPEATEDLY

[1] 50:16

REPLACED [1]

52:8

REPLENISHED

[4] 41:24;

42:13; 44:2, 7

REPLENISHMEN**T** [3] 42:1, 9,

20

REPLIES [2]

30:5, 9

REPLY [4]

29:21; 30:12,

20; 45:23

REPORTED [1]

1:23

REPORTER [3]

1:25; 62:10, 14

REPRESENT [1]

61:23

REPRESENTATI**ON** [2] 41:2;

44:1

REPRESENTATI**ONS** [3] 25:6;

41:3; 43:19

REPRESENTED

[5] 40:21;

42:10; 52:10,

18; 57:7

REQUEST [3]

45:18; 51:14;

54:4

REQUESTED [5]

16:15; 47:12;

51:14; 52:12;

54:2

REQUIRE [1]

60:9

REQUIRES [1]

43:9

RESERVE [1]

11:24

RESISTANCE [2]

19:19, 20

RESISTED [2]

36:25; 54:4

RESOURCES [1]

30:15

RESPECT [2]

36:4; 38:17

RESPECTFULLY

[3] 33:4; 45:17;

46:5

RESPOND [4]

3:15; 31:21;

32:18; 38:10

RESPONDED [5]

35:15; 46:11,

24; 51:2; 57:8

RESPONSE [14]

3:13; 12:2, 21;

16:16; 17:7, 25;

29:8, 9; 30:22,

25; 31:23;

39:19; 40:25;

50:17

RESPONSES [1]

32:19

RESULT [4]

3:10; 37:24;

40:10; 51:5

- RETRIEVE** [1]
58:14
- REVEAL** [4]
48:22; 54:25;
57:13; 59:8
- REVEALED** [4]
54:18, 22; 55:5,
8
- REVEALING** [1]
37:1
- REVERSALS** [1]
7:6
- REVERSE** [1]
12:6
- REVERSED** [1]
50:13
- REVIEW** [8] 3:6,
9; 5:16; 12:3;
47:12, 20, 21;
49:3
- REVIEWED** [3]
15:21; 48:5;
57:9
- REWARD** [1]
40:7
- RIDOLFI** [2]
45:6; 48:2
- RIDOLFI'S** [1]
47:16
- RIGHT** [39] 2:2,
14, 25; 5:10;
6:13; 8:6; 9:7;
11:18; 12:1;
13:4, 23; 14:10,
16; 15:11;
16:1; 17:5, 18;
18:1, 16; 19:21;
20:23; 22:5, 6;
23:20; 27:15;
28:8, 24; 31:16;
33:2; 34:4;
35:25; 43:4, 7;
47:5; 49:16;
60:7; 62:5
- RIGHTS** [1]
19:24
- ROLLOVER** [1]
43:12
- RULES** [1]
49:25
- RULING** [1]
11:24
- RUNNING** [1]
8:21
- RUSSELL** [2]
1:12; 2:4
- RUTHLESS** [2]
49:6, 7
-
- S -
-
- SANDRA** [2]
1:16; 2:6
- SATISFIED** [1]
25:23
- SAYING** [11]
5:8; 16:8, 11,
12, 13; 35:5,
17, 18; 39:1, 4;
42:8
- SCANNED** [1]
44:15
- SCENES** [1] 6:9
- SCHAMEL** [15]
1:20; 2:15, 20,
23; 28:25;
29:1, 10, 20;
32:10; 46:16;
60:19, 22;
61:24; 62:1
- SCHEDULE** [1]
49:3
- SCHEDULED** [1]
46:21
- SCHEDULING**
[1] 46:16
- SCRIPT** [1]
38:24
- SCRUB** [4]
34:20, 23; 35:6,
12
- SEARCH** [3]
17:15; 49:1;
53:18
- SEARCHES** [1]
19:1
- SEATED** [2]
2:21; 49:16
- SECOND** [13]
20:2; 29:17;
33:22; 39:13,
20; 40:2, 4;
43:24; 46:15;
47:6; 49:18;
57:19; 60:10
- SECONDARY** [2]
18:9; 19:5
- SEEING** [2]
19:6; 24:6
- SEEKING** [2]
14:16; 30:20
- SEEKS** [1]
49:21
- SEIZED** [3]
3:24; 4:1;
53:17
- SELECTIVE** [1]
32:20
- SENTENCED** [1]
19:22
- SEPTEMBER** [5]
1:9; 24:17;
44:11, 16;
51:19
- SERVICE** [3]
14:7, 10; 18:20
- SEVEN** [4] 34:8;
36:2, 21, 24
- SEVERAL** [4]
49:22; 50:1;
57:14; 59:14
- SHE'LL** [1]
48:19
- SHE'S** [10]
17:21, 23; 18:5,
6, 9, 10; 19:1,
8; 24:22
- SHEER** [1]
26:21
- SHOCK** [1]
59:21
- SHORT** [2] 26:8
- SHORTAGE** [3]
24:7; 26:11;
47:23
- SHORTAGES** [7]
24:12, 13;
25:10; 34:8, 9;
47:16, 17
- SHORTLY** [1]
3:20
- SHOULD** [13]
9:18; 16:16;
18:4; 25:16;
35:23; 40:9;
50:15; 55:11,
22; 56:2;
58:15, 16, 21
- SHOULDN'T** [2]
19:23; 39:5
- SHOWED** [3]
25:14; 38:8;
48:2
- SHOWING** [11]
37:15; 38:7, 20;
40:15; 41:16,
23; 42:13;
43:21; 44:21;
45:5; 51:11
- SHOWS** [8]
13:15; 26:9;
34:7; 35:10;
36:11; 40:13;
43:16; 44:6
- SIDES** [1] 32:8
- SIGNATURE** [3]
5:13; 31:12;
53:23
- SIGNIFICANT**
[17] 5:22;
16:19; 19:17;
22:23; 25:1;
31:4; 39:21;
44:10; 50:5, 21;
52:19; 53:2;
56:17; 57:5;
58:2; 59:3, 21
- SIGNIFICANTLY**
[1] 58:6
- SILENCE** [3]
9:21; 50:18;
57:4
- SIMPLY** [1] 6:6
- SINCE** [3]
14:11; 40:24;
59:24
- SINGLE** [1]
38:6

SITTING [1]
 60:25
SIZED [1] 4:23
SLOPPY [3]
 27:22, 24;
 57:22
SOLELY [1]
 47:18
SOMEBODY [2]
 32:13; 41:2
SOMETHING [2]
 22:25; 29:2
SOMETIMES [2]
 21:19; 48:21
SOMEWHAT [1]
 16:23
SORRY [4]
 36:15, 18;
 43:13; 45:9
SOUGHT [4]
 30:19; 53:11;
 54:8
SOUNDS [2]
 23:22; 27:11
SOURCE [4]
 18:9, 13; 19:5;
 51:17
SOVICH [3]
 1:24; 62:9, 14
SPACE [5] 4:5,
 9; 5:4, 6; 58:22
SPECIAL [3]
 2:9, 11; 50:18
SPECIALIZE [1]
 51:23
SPECIFIC [3]
 35:4; 37:17;
 52:12
SPECIFICALLY
 [5] 17:21;
 29:18; 35:12;
 49:25; 57:8
SPECIFICITY [1]
 51:15
SPRINT [1]
 14:10
STAGE [1]
 35:25
STAND [2]
 14:24; 38:21
STARTED [2]
 4:8; 42:16
STATE [1] 48:5
STATED [1]
 39:24
STATEMENTS
 [4] 30:9, 22;
 31:23; 32:18
STATES [5] 1:1,
 4, 13, 15; 2:5
STENOGRAPHIC
 [1] 62:10
STEPS [1]
 20:12
STILL [16]
 22:20; 24:6, 12;
 25:8; 26:3, 7, 9;
 27:9; 28:10;
 29:20, 22;
 42:11, 22; 43:1;
 44:8
STOOD [1]
 44:17
STOPPED [2]
 24:16; 27:15
STOPPING [1]
 10:7
STORE [9]
 7:20; 10:23;
 44:13, 18, 22;
 55:18; 58:22,
 24
STORED [1]
 21:19
STORES [3]
 34:12; 36:8, 9
STORING [1]
 8:13
STRANGE [1]
 60:22
STRATEGY [3]
 39:25; 48:12,
 22
STRENGTH [1]
 36:10
STRIKE [1]
 24:17
STRONG [1]
 56:22
STRONGLY [2]
 6:23; 54:4
STUFF [7] 7:15,
 16; 8:14, 17,
 18; 46:11; 47:9
STUNNING [1]
 34:6
SUBMISSIONS
 [1] 49:12
SUBMITS [1]
 28:10
SUBMITTED [3]
 27:3; 36:4;
 38:10
SUBORNED [1]
 16:11
SUBPOENA [6]
 13:10; 14:3, 4,
 5; 54:8, 12
SUBPOENAED
 [7] 12:13, 16;
 13:11, 23; 14:1;
 18:19; 57:13
SUBPOENAING
 [1] 56:12
SUBSEQUENT
 [3] 12:5; 50:11;
 53:7
SUBSEQUENTLY
 [1] 54:1
SUBSTANTIAL
 [4] 5:21; 22:20;
 26:9; 33:24
SUBSTANTIALL
Y [3] 20:17;
 39:14; 40:3
SUFFERED [1]
 54:11
SUFFICIENT [3]
 51:7, 15; 60:9
SUGGESTING
 [1] 28:20
SUGGESTS [1]
 55:11
SUMMARIES [1]
 12:14
SUMMARIZE [1]
 52:11
SUMMER [1]
 44:14
SUPERSEDING
 [4] 3:7; 29:17;
 49:18; 60:11
SUPERVISED [1]
 33:8
SUPPLEMENT
 [3] 29:15; 50:8;
 54:3
SUPPLEMENTAL
 [1] 29:14
SUPPLEMENTS
 [1] 3:8
SUPPLIED [2]
 40:15, 22
SUPPORT [2]
 30:5; 50:20
SUPPORTING
 [4] 52:19;
 56:17; 58:3;
 60:15
SUPPOSED [3]
 3:10; 5:18;
 35:1
SUPPRESSING
 [1] 44:20
SUPPRESSION
 [1] 43:17
SUPREME [1]
 6:19
SURPLUS [5]
 5:24; 44:13, 22;
 54:21; 55:4
SURPLUSES [1]
 52:14
SWITCHING [1]
 34:6
SYSTEM [6]
 12:17, 18; 15:3,
 15; 17:11;
 56:15

- T -

TABLE [1] 2:8
TAINTED [1]
 60:3
TAKEN [1] 3:5
TAKING [1]
 46:10

TALKED [1]
 26:16
TALKING [6]
 4:22; 21:11;
 24:14; 26:21;
 60:23
TECHNICAL [1]
 14:19
TECHNICALLY
 [2] 14:17, 18
TERMS [3] 6:7;
 16:6; 23:17
TERRIBLY [1]
 23:10
TESTIFIED [6]
 12:3; 21:19;
 22:1; 23:3;
 55:21; 57:9
TESTIFIES [1]
 14:25
TESTIFY [5]
 40:1; 51:12;
 52:3; 54:11;
 56:13
TESTIMONY [17]
 3:12; 12:12;
 15:21; 16:13,
 14; 24:18;
 50:10; 57:2, 4,
 5, 12, 16, 17,
 19, 25; 58:5;
 59:21
THANK [4]
 2:23; 45:14;
 49:14; 62:5
THAT'S [33]
 2:19, 22; 3:17;
 4:7, 8; 5:5;
 7:14; 9:13;
 13:13, 20; 14:3;
 18:18; 19:3;
 21:8, 22; 23:9;
 24:3; 25:4;
 28:6; 29:6;
 31:1; 34:3;
 35:16; 39:3;
 41:15, 17;
 42:15, 24; 43:3,
 4; 44:4, 17
THEIR [23]
 20:25; 21:14,
 25; 27:19;
 33:13; 36:12;
 37:6; 39:19, 21,
 24; 40:14, 20;
 44:1, 21; 48:9,
 22; 50:17;
 53:11, 17, 24;
 55:16; 59:10
THEMSELVES
 [1] 34:20
THEORY [7]
 7:5; 11:15, 16;
 47:15; 55:9;
 56:24; 58:7
THERE [57]
 3:23; 4:20;
 5:24; 7:7, 10,
 19; 8:4, 18, 19,
 21, 23; 9:23;
 12:1, 21; 15:6;
 16:16; 17:14,
 24; 18:4, 23;
 21:21, 23; 24:2,
 12; 27:14;
 29:16; 30:16,
 21; 31:24;
 32:6; 34:19;
 35:3, 4; 36:21;
 41:4, 5, 12, 13,
 21, 22; 42:11,
 24; 45:3;
 46:11; 47:15,
 17, 18, 22;
 51:3, 11; 53:3;
 56:22; 57:13;
 59:16; 60:2;
 61:18
THERE'S [9]
 3:2; 17:19;
 19:16; 23:19;
 29:22; 34:23;
 35:4; 44:9;
 46:10
THEREFORE [1]
 56:2
THESE [22]
 5:25; 6:16; 9:1;
 10:21; 21:21;
 26:7, 14; 28:4,
 6; 29:24;
 36:11, 12, 24;
 39:4; 41:22;
 42:16; 45:23;
 51:22; 52:7, 13;
 58:20; 60:14
THEY'RE [8]
 11:3; 32:7, 10;
 39:4, 5, 7; 46:9,
 10
THING [4]
 16:21; 22:21;
 26:20; 48:11
THINGS [9]
 4:20; 8:22;
 11:9; 27:4;
 33:15; 34:17;
 39:6, 7; 42:14
THINK [16]
 10:9, 16; 13:2;
 16:4; 20:1;
 22:25; 31:6;
 32:5, 10; 34:25;
 35:4, 9, 20;
 43:15; 44:10;
 48:13
THIRD [1] 34:2
THIRD-PARTY
 [3] 27:8; 42:6,
 21
THOROUGHLY
 [1] 3:6
THOSE [40]
 3:19; 4:2, 20;
 8:5, 8; 12:16;
 13:23; 14:21;
 17:20; 18:16;
 20:1; 21:15, 16;
 25:2, 18; 27:10;
 29:20; 30:9;
 33:8, 14, 16, 23;
 34:10, 16; 37:3,
 9, 16, 18, 19;
 39:12; 47:21;
 49:9; 51:12;
 52:5, 23; 54:16;
 55:21; 56:2;
 59:17
THOUGH [1]
 17:13
THOUGHT [8]
 7:11, 22; 18:23;
 25:25; 26:1;
 46:25; 48:7, 10
THOUSAND [2]
 23:2; 26:8
THOUSANDS [2]
 8:23
THREE [2]
 33:15; 34:16
THROUGH [16]
 4:14; 6:16;
 7:17, 24; 8:1, 3;
 14:2, 4, 25;
 22:20; 24:13;
 26:20; 36:20;
 38:25; 47:13;
 57:7
TIME-CONSUMI
NG [1] 60:14
TIMEFRAME [10]
 9:24; 12:24;
 14:4, 9, 16, 20;
 15:8, 14; 42:4;
 57:11
TIMELINE [1]
 43:16
TIMELY [1] 53:9
TIMES [3] 6:17;
 8:1; 12:15
TIMING [1] 6:9
TODAY [6]
 2:12; 12:20;
 30:10; 32:23;
 45:20; 49:13
TODAY'S [1]
 50:23
TOGETHER [2]
 22:9; 25:10
TOLLS [1]
 18:20
TOTAL [2] 22:9;
 24:22
TRANSCRIPT [2]
 1:11; 62:10
TRANSFER [2]
 21:11; 47:10

TRANSFERRED
[1] 34:12
TRANSFERRING
[1] 21:18
TRANSFERS [1]
34:15
TRANSITIONING
[1] 48:6
TRAVEL [1]
29:6
TRIAL [54]
3:24; 5:18, 19,
20; 7:8, 9; 8:7;
9:6; 11:4, 9, 16;
12:8, 11; 13:5;
19:19; 20:17;
24:18; 27:6;
30:8; 31:19;
34:4; 37:4, 24;
39:13, 20, 23,
25; 40:1, 2, 3,
4, 7, 14; 43:23;
44:16; 46:21,
22; 48:22;
49:3; 51:1;
52:2, 18; 53:5,
7, 9; 54:3, 17;
56:4, 25; 58:8,
12, 25; 59:6;
60:9
TRIED [4]
26:20; 34:23;
42:2; 44:7
TROUBLE [2]
21:9; 48:8
TROUBLED [2]
57:18; 58:10
TRULY [2]
23:23; 26:25
TRYING [4]
23:23; 43:8;
49:3, 7
TURNED [3]
55:22; 56:3, 21
TURNS [1] 41:4

- U -

UNABLE [2]
8:8; 52:10

UNCLEAR [1]
29:13
UNCOMFORTABLE [1] 46:20
UNCONTESTED
[3] 38:22; 39:3,
12
UNCOVERED [1]
16:24
UNDER [7]
11:14; 19:18;
22:14; 29:18;
40:4; 49:24;
52:5
UNDERLYING
[2] 38:3, 15
UNDERMINE [1]
51:7
UNDERSTAND
[14] 7:8; 8:12;
9:1; 11:7; 23:6,
7; 25:18;
27:12, 15, 23;
29:16; 43:8;
62:1
UNDERSTANDING [6] 4:3; 5:13;
20:5; 22:22;
48:1, 8
UNDERSTOOD
[2] 6:12; 26:25
UNDISPUTED [5]
33:6; 34:16;
37:18; 38:13;
39:13
UNFAIRLY [1]
39:14
UNFORTUNATE
[1] 6:9
UNITED [5] 1:1,
13, 15; 2:5
UNJUSTIFIED
[1] 33:24
UNLESS [1]
32:23
UNNOTICED [1]
24:11
UNORTHODOXED [1] 61:7

UNRELATED [1]
60:19
UNTIL [9] 27:8,
16; 38:1; 42:4,
21; 44:3, 14;
61:2, 20
UPLOADED [5]
12:17, 22;
15:12, 16; 19:3
USEFUL [1]
11:2
USING [3]
21:24; 23:8;
55:25

- V -

VACANT [1] 5:5
VALUE [2]
58:20, 21
VARIETY [2]
2:12; 12:15
VENDOR [1]
44:15
VERSUS [2]
2:5; 52:4
VIJAY [1] 1:7
VIOLATED [2]
19:24, 25
VIOLATION [5]
40:8; 49:24;
51:16; 55:18;
59:19
VIOLATIONS [2]
50:2; 60:6
VIRGINIA [1]
46:21
VOLUME [1]
26:21
VOLUNTARILY
[1] 37:3
VOUCHING [6]
19:9, 10, 11, 12;
26:21

- W -

WAITED [1]
38:1

WAIVER [1]
9:22
WANTED [10]
3:21; 8:11;
10:19; 17:8;
18:3; 20:11;
34:20; 36:11;
47:17; 48:17
WANTS [3]
9:14, 17; 46:4
WAREHOUSE [3]
10:22; 27:5;
41:16
WARRANT [1]
49:1
WARRANTED [1]
37:16
WARRANTS [1]
53:18
WASHINGTON
[4] 4:12; 7:17;
8:14; 48:25
WASN'T [11]
9:22; 14:20;
21:2, 3; 27:8,
25; 42:21;
43:5, 22; 48:6;
59:15
WATER [1] 8:21
WE'LL [1] 31:7
WE'RE [8] 2:12;
5:17; 9:20;
17:7; 21:11, 14;
24:6, 14
WE'VE [10]
5:25; 8:3;
26:16, 18;
27:16; 31:24;
38:25; 45:20,
21
WEAKENED [1]
58:6
WEEKS [1] 10:1
WEREN'T [4]
9:2; 15:6;
17:13; 19:18
WHAT'S [1]
10:7

- WHATEVER** [4]
5:17; 20:7; 26:8, 10
- WHATSOEVER**
[1] 43:15
- WHERE** [13]
4:13; 5:23, 25; 7:17; 8:4, 18; 14:7; 15:3, 16; 26:7; 41:15; 51:18; 59:16
- WHETHER** [16]
6:13; 8:8; 12:2; 15:25; 17:24; 22:13; 28:5; 29:8; 31:8, 9; 38:24; 39:10; 46:19; 57:16, 17; 61:2
- WHICH** [33]
5:13; 6:1; 7:12; 10:21; 13:6, 15, 16, 18; 14:5; 21:4; 23:2; 24:2; 25:15, 25; 26:5, 9; 33:16, 23; 34:7; 40:17; 42:22; 44:6, 25; 47:18; 48:13, 24; 49:1; 54:13, 19; 55:21; 59:17; 60:16; 61:6
- WHO'S** [1]
28:25
- WHOLE** [6] 7:5; 11:8; 22:21; 26:14, 20; 27:2
- WILKINSON**
[110] 1:16; 2:4, 6, 11; 3:17; 4:6, 7, 16, 24; 5:2, 8, 11; 6:4, 6, 22, 25; 7:14, 23; 9:13, 15, 24; 10:2, 4, 9, 14, 18, 24; 11:7, 16, 19, 22; 12:8; 13:2, 5, 9, 13, 17, 20, 25; 14:3, 13, 17, 23; 15:2, 9, 12, 15, 19, 22; 16:2, 4, 6, 10, 20, 23; 17:16, 19, 22; 18:1, 3, 7, 9, 12, 15, 18; 19:1, 10, 14; 20:20, 24; 21:13, 17, 21; 22:3, 5, 7, 17, 19; 23:4, 14, 16; 24:5, 25; 25:8; 27:21, 23, 25; 28:3, 9, 17, 20; 29:2; 32:5, 7, 12, 14; 41:7; 42:12; 43:3, 12; 45:23, 25; 46:14, 15, 24; 47:5, 6, 8; 49:14; 62:4
- WILKINSON'S**
[1] 46:17
- WILLFULNESS**
[1] 57:22
- WITHDRAW** [1]
61:15
- WITHHELD** [5]
37:5, 19; 40:24; 44:10; 45:4
- WITHIN** [3]
34:20; 52:15; 57:15
- WITHOUT** [3]
30:8; 31:17; 32:21
- WITNESS** [3]
31:3; 50:9; 55:20
- WITNESSES** [6]
40:1; 50:4; 52:10, 14; 54:10; 60:9
- WON'T** [1]
36:20
- WORDS** [2]
40:2; 41:3
- WORKING** [3]
19:7; 48:8; 52:5
- WORTH** [5]
24:16, 19, 20; 25:13, 18
- WOULD** [56]
5:13; 6:19; 8:5, 22; 10:24, 25; 11:4, 14; 19:21; 23:12; 26:5, 10; 27:20; 28:10; 29:7, 23; 30:12; 31:7, 8, 21; 32:9, 17; 33:3; 35:17, 18; 36:25; 37:2; 39:6, 13, 20; 40:3, 5, 7; 45:15; 47:1; 48:10, 14; 49:9, 19; 51:5, 18; 52:8; 53:13; 54:11; 55:6, 8; 56:5, 10, 21, 22; 58:6, 9; 61:16, 19; 62:2
- WOULDN'T** [2]
11:10; 45:4
- WRITING** [3]
3:18; 32:18; 50:23
- WRITTEN** [3]
9:19; 12:21; 49:12
- WRONG** [7]
6:13; 14:7; 18:19; 19:3; 24:7; 26:3; 55:10
- WROTE** [1]
53:25
-
- Y -
-
- YEARS** [2]
31:18; 32:25
- YESTERDAY** [3]
29:21; 30:22; 46:12
- YOU'RE** [5]
15:19; 30:12, 14, 20; 38:24
- YOU'VE** [2]
30:13; 46:8
-
- Z -
-
- ZEALOUS** [1]
26:15