



Detail

Complaint Number: 168

Immigration Judge: **Cassidy, William A.**

Complaint Date: 04/27/10

Current ACIJ

Smith, Gary W.

Base City

(b) (6)

Status

CLOSED

Final Action

Complaint dismissed due to the complainant's failure to state a claim

Final Action Date

06/03/10

A-Number(s)	Complaint Nature(s)	Complaint Source(s)
(b) (6)	In-court conduct	Third party (b) (6)

Complaint Narrative: Attorney alleges IJ deprived (b) (6) of (b) (6) 1st Amendment right to observe hearings & ordered security to have (b) (6) removed from the building. In general the attorney feels the IJ does not record significant portions of the hearings, goes off/on record and does not summarize off record.

Complaint History	
04/19/10	Alleged conduct occurred
04/28/10	ACIJ/CP responds to source acknowledging complaint.
05/05/10	Database entry created
06/03/10	Complaint dismissed due to the complainant's failure to state a claim
06/04/10	ACIJ responds to source
06/09/10	ACIJ/CP sets up a call with the source to discuss complaint
06/10/10	Source met with ACIJ C/P via telephone meeting

Moutinho, Deborah (EOIR)

From: Smith, Gary (EOIR)
Sent: Wednesday, May 12, 2010 12:14 PM
To: Cassidy, William A. (EOIR)
Subject: RE: judge cassidy

Thanks, Judge, I appreciate your getting back with me on this. That will assist in preparing a comprehensive response.

From: Cassidy, William A. (EOIR)
Sent: Wednesday, May 12, 2010 10:57 AM
To: Smith, Gary (EOIR)
Subject: RE: judge cassidy

Dear Judge Smith:

The exchange with (b) (6) went as follows to the best of my recollection:

Miss, I going to have to ask you to leave.

On WHAT, Authority?

If you like me to provide with the copy of the regulations, I will.

I know the regulations.

Then, I am going to ask you to leave. I need to speak to the Respondent. After I speak with him, if I deem it appropriate I will allow you to return.

May, I speak to the Respondents?

No.

I then departed the court to obtain the file for the next individual hearing.

When I returned (b) (6) was gone. (b) (6) my clerk indicated that she came to the front of the courtroom and spoke with the Respondents present via televideo at (b) (6) and then left indicating that she would be in the waiting room.

While she did speak to some of the detainees from the morning master hearing, she did not speak with the Respondent who was the subject of the individual hearing.

He had not been brought up, as of yet. When the Respondent appeared I explained on the record his right to have a closed hearing and he made that request. You may wish to review the DAR.

I did not have further contact with (b) (6) and at no time did I ask anyone to remove her. I only learned about her departure at the conclusion of my hearing.

I had asked (b) (6) to prepare an account of the incident and send it to you soon after this event. If she hadn't responded you may wish to speak with her privately.

Bill

I will respond to the Bond issue shortly. If there is anything on this matter that I need to address please let me know. Please note I did not identify that the matter before me was an asylum hearing. However, it was and involved very personal issues and the Respondent did request the hearing be

closed.

From: Smith, Gary (EOIR)
Sent: Tuesday, May 11, 2010 5:02 PM
To: Cassidy, William A. (EOIR); (b) (6) (EOIR)
Subject: FW: judge cassidy

Judge (b) (6) We're going to need to come up with a very objective response to (b) (6) complaint. Please review this and let's begin working on it. Thanks. (I recognize that she has been problematic there and will likely continue to be.)

From: Keller, Mary Beth (EOIR)
Sent: Tuesday, May 11, 2010 4:33 PM
To: Smith, Gary (EOIR)
Subject: FW: judge cassidy

Gary,

Here is what I initially got. Then I spoke with her on May 03 on the phone. She reiterated most of what was in the (b) (6) and added a few other things. She claims problems with respondents getting into the (b) (6) facility following their release; and problems with respondents getting copies of the 213s in their own records from either DHS or the judge.

Non-Responsive

I think the substance of what she is asserting that we may want to get the judge to respond to are

(1) improperly closing hearings? (b) (5)

(b) (5)

(2) IJ ordering the guards to have her removed from the building? (b) (5)

(b) (5)

(3) Failure to record hearings. (b) (5)

(b) (5)

(4) Stated policy of categorically denying bond unless there are ten years of income tax records in evidence. (b) (5)

(b) (5)

mtk

-----Original Message-----

From: (b) (6) [mailto:(b) (6)]
Sent: Thursday, April 29, 2010 12:43 AM
To: Keller, Mary Beth (EOIR)
Subject: RE: judge cassidy

Dear Ms. Keller,

Thanks for your follow up explanation. I was hoping to talk with you to have an understanding of the process I should be expecting, including a

timeline and the people who will be making decisions about this complaint.

(b) (6)

> (b) (6)

> My email to you was intended as a courtesy to acknowledge receipt of
> your complaint. Your colleague is correct; I will consider the material
> you've provided, and talk with the people to whom you referred me first,
> and then I would be happy to talk with you via phone.

> MaryBeth Keller
>> Assistant Chief Immigration Judge
>> EOIR/OCIJ
>> 703/305-1247

>> (b) (6)

> -----Original Message-----

> From: (b) (6) [mailto:(b) (6)]
> Sent: Wednesday, April 28, 2010 3:02 PM
> To: Keller, Mary Beth (EOIR)
> Subject: RE: judge cassidy

> Dear Ms. Keller,

> As I'm sure you understand, I have many reasons to distrust this
> process.

> Alas, your response this morning is now among them.

> A colleague has told me that you are happy to speak by phone to other
> people who have filed misconduct complaints. I would appreciate this
> same
> courtesy.

> (b) (6)

>> (b) (6)

>> This is to let you know that I have received this message, as well as
>> your voicemail. I will look into and get back to you and let you know
>> if I need more information or detail.
>> Thank you.

>> MaryBeth Keller
>> Assistant Chief Immigration Judge
>> EOIR/OCIJ
>> 703/305-1247

>> (b) (6)

>> -----Original Message-----

>> From: (b) (6) [mailto:(b) (6)]
>> Sent: Tuesday, April 27, 2010 10:36 AM
>> To: Keller, Mary Beth (EOIR)

>> Subject: judge cassidy

>>

>> Dear Ms. Keller,

>>

>> I am writing at the suggestion of an AILA member to file a misconduct
>> complaint against IJ William Cassidy for unlawfully instigating guards
>> working for the Federal Protective Services to threaten and use force
>> against me. I believe that by enlisting guards to "get her out of the
>> building" Mr. Cassidy engaged in criminal conspiracy to commit
> assault.

>> He also deprived me of my First Amendment right to attend the

>> immigration

>> hearing and he appears to have violated the Immigration Practice

> Manual

>> rule stating that asylum hearings may be closed only at the request of
>> the

>> respondent.

>>

>> This occurred on Monday, April 19, 2010 at the immigration courts in

>> (b) (6)

>> The details are described in my (b) (6)

>> and

>> I would request that you rely on this information for the background
> and

>> specific facts concerning this incident:

>>

> (b) (6)

>> You may also contact Lauren Alder Reid in EOIR; she can confirm that
> I

>> gave her this narrative within about two hours of its occurrence. (I
>> also

>> want you to note the comments by other attorneys responding to this
>> post.)

>>

>> I hope it is okay if I call to discuss this in more detail.

> Meanwhile,

>> please feel free to call me at (b) (6)

>>

>> Sincerely,

>>

>> (b) (6)

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>>

> (b) (6)

>

(b) (6)

(b) (6) allegations against Cassidy:

1. IJ Cassidy closed a hearing without following proper procedures, thus depriving (b) (6) of her first amendment right to observe
 - a. date/time: ~3pm, 4/19/10
 - b. witnesses: interpreter, clerk
 - c. A#: unable to locate afternoon case on IJ's docket on 4/19
2. IJ Cassidy ordered security to have (b) (6) removed from the building, an act which constitutes misdemeanor simple battery or conspiracy to commit assault
 - a. date/time: ~3pm, 4/19/10
 - b. witnesses: (b) (6) guards, (b) (6) ?
3. in general, IJ Cassidy does not record significant portions of hearings, fails to note which portions are on and off the record, and does not summarize off-the-record exchanges when going back on the record
4. IJ Cassidy has a stated policy of categorically denying bond unless there are ten years of income tax records in evidence
 - a. date/time: AM, 4/19/10
 - b. witnesses: TA, private bar, interpreter, clerk
 - c. A#s: (b) (6)

Cassidy

DATE: 04/29/2010
TIME: 08:28 AM

Executive Office for Immigration Review
10 Monthly Calendar Summary Report
JUDGE WILLIAM A. CASSIDY, (WAC) 04/2010

MONDAY	TUESDAY	WEDNESDAY	THURSDAY	FRIDAY
05	06	07	08 08:30 08:30 (b) (6) UNK SP	02
12	13	14	09 09:00 1:00 MASTER-002 (b) (6) ENG	09
19 08:30 MASTER-001 (b) (6) UNK UNK SP	20	21	15	16
26	27	28	22	23
			08:30 (b) (6) ENG	30

'e' - Expedited Asylum Case
's' - Rider Case

Moutinho, Deborah (EOIR)

From: Smith, Gary (EOIR)
Sent: Wednesday, June 02, 2010 3:24 PM
To: Keller, Mary Beth (EOIR)
Cc: Moutinho, Deborah (EOIR)
Subject: FW: (b) (6) - April 19, 2010

(b) (5)
 (b) (5) I called (b) (6) and she confirmed the account she provided (b) (6) earlier today. She said that the judge had excluded (b) (6) from the courtroom for the case and that (b) (6) (Supervisory (b) (6)) had let them know that, not the judge. When (b) (6) and the officers told (b) (6) that, she said (b) (6) (b) (6) began creating a ruckus to draw attention and started ranting and raving. She said she then asked (b) (6) to leave the building. (b) (6) wanted some more but eventually left the building.

From: (b) (6) (EOIR)
Sent: Wednesday, June 02, 2010 3:11 PM
To: Smith, Gary (EOIR)
Subject: (b) (6) - April 19, 2010

Good Afternoon Judge Smith,

(b) (6) number is (b) (6). Below is the information she provided to me this morning. In addition, I am waiting on FPS to provide me with the incident report.

I spoke with (b) (6), Lead Security Officer/Contractor today June 2, 2010. (b) (6) informed me of what her recollection of the incidents that took place on the date in question. (b) (6) indicated that (b) (6) (b) (6) came in early that day and ask indicated that she wanted to go into the court hearings. They ask her to come see the court administrator (b) (6).

Later in the day when the incident began (b) (6) was not present at the onset. Upon her arrival it was Officer (b) (6) and Officer (b) (6) present with (b) (6) who was ranting and raving, and they informed (b) (6) that Judge (b) (6) did not want (b) (6) in (b) (6) courtroom because there was an asylum hearing. (b) (6) was told to leave the building and she started ranting and raving and wanted to know on whose authority is she being removed from the building. (b) (6) proceeded to guide (b) (6) by her elbow (she indicated this was by the tip of her fingers on (b) (6) elbow and not a grip hold) and informed her that she needs to exit the building and then she was ranting and raving that she was being assaulted and turned around to get all of the officers names (b) (6) Officer (b) (6) and Officer (b) (6). After she got the names (b) (6) continued to guide her out of the building.

She informed me that (b) (6) and (b) (6) are still not present, but there accounts should be in the official report that I have to obtain from DHS/Federal Protective Service.

Moutinho, Deborah (EOIR)

From: IJConduct, EOIR (EOIR)
Sent: Friday, June 04, 2010 9:51 AM
To: (b) (6)
Attachments: Response ltr.pdf

Please see attached response to your complaint.



U. S. Department of Justice

Executive Office for Immigration Review

Office of the Chief Immigration Judge

5107 Leesburg Pike, Suite 2500

Falls Church, Virginia 22041

June 3, 2010

(b) (6)

Dear (b) (6)

Your complaint of April 27, 2010, to Assistant Chief Immigration Judge MaryBeth Keller, concerning the (b) (6) Immigration Court and Immigration Judge William A. Cassidy was referred to me as the Assistant Chief Immigration Judge supervising the (b) (6) and (b) (6) Immigration Courts.

I inquired into the circumstances raised in your complaint. You principally raised four matters. You stated that Judge Cassidy unlawfully instigated guards working for the Federal Protective Service to threaten and use force against you and enlisted guards to "get you out of the building" on April 19, 2010, at the (b) (6) Immigration Court. My inquiry revealed that you were permitted to attend hearings that afternoon. Judge Cassidy asked you leave the courtroom because he needed to inquire of a *pro se* respondent whether the respondent wished to have the hearing closed to the public. Judge Cassidy told you that after speaking with the respondent in the case, if he deemed it appropriate, he would permit you to return. After talking with the respondent, the judge deemed it appropriate under 8 Code of Federal Regulations, Section 1003.27, to exclude the public from that hearing. My review of the nature of that case reveals that was appropriate. Such action is authorized under the regulatory section cited.

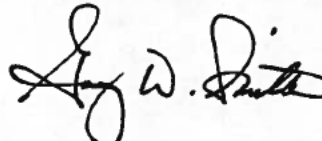
The second matter you raised pertained to Judge Cassidy ordering a security officer to have you removed from the building. My inquiry does not reveal that to be substantiated, and there is no indication that the judge ordered your removal from the building. (b) (6) (b) (6) then a legal assistant, did tell you that the hearing was closed.

The third matter you raised with Judge Keller was your belief that Judge Cassidy does not record hearings. Judge Cassidy regularly records all removal proceedings, as is his duty under 8 Code of Federal Regulations, Section 1003.28. Some authorized procedures, such as pre-hearing conferences, are not required to be recorded.

The fourth matter you raised is whether Judge Cassidy has a policy of categorically denying bond redetermination unless there are ten years of income tax records. The decision of the immigration judge whether to redetermine bond and in what amount is governed by 8 Code of Federal Regulations, Section 1003.19, based on the Immigration and Nationality Act, the Code of Federal Regulations, and appellate case law. Judge Cassidy is bound by those governing authorities and makes an individualized determination based on the facts in each case. If a respondent believes that the immigration judge has erred, he or she is free to appeal the bond redetermination decision to the Board of Immigration Appeals.

I appreciate your bringing your concerns to our attention, and we will do our best to ensure that all respondents appearing before our Courts, as well as others attending proceedings, are treated fairly and with courtesy and respect.

Sincerely,

A handwritten signature in black ink, appearing to read "Gary W. Smith". The signature is fluid and cursive, with the first name "Gary" being the most prominent.

Gary W. Smith
Assistant Chief Immigration Judge

Keller, Mary Beth (EOIR)

From: (b) (6)
Sent: Tuesday, July 27, 2010 3:46 PM
To: Keller, Mary Beth (EOIR)
Subject: RE: [Fwd: Question about Document Discrepancy]

Sorry, one more question for purposes of clarification: were the notes to which you are referring below taken contemporaneous with our conversation on June 10, 2010?

(b) (6)

> Hi (b) (6)
> My notes reflect that you asked if there was a "manual" for conducting
> investigations at OCIJ, to which I responded that there was not. There
> is not. My notes also reflect that I referred you to our website which
> contains the summary guidelines you reference below. This is a general
> summary of our management process for handling complaints and not what
> I understood you to be asking for, though I nevertheless did refer you
> to it.
> mtk

> _____
>
>
> MaryBeth Keller
>
> Assistant Chief Immigration Judge
>
> OCIJ/EOIR

> (b) (6)
>
> 703.305.1247
>

> -----Original Message-----

> From: (b) (6) [mailto:(b) (6)]
> Sent: Tuesday, July 27, 2010 12:27 PM
> To: Keller, Mary Beth (EOIR)
> Subject: [Fwd: Question about Document Discrepancy]

>
> Dear MaryBeth Keller,
>
> I received an autoreply indicating you were returning July 1, 2010.
>
> As I have not received a reply I am resending. I have checked my
> notes and they are consistent with the question below.
>
> Based on the record at hand, either you knew of these written
> guidelines for IJ misconduct investigations and lied to me, or they
> were produced without your knowledge and not distributed to someone
> who would be charged with implementing these procedures, or the
> document was produced with or without your collaboration after we
> spoke and backdated.
>
> Please let me know if you have anything further to add.
>
> Thank you,
>
> (b) (6)

>
>
> ----- Original Message

> Subject: Question about Document Discrepancy

> From: "(b) (6)" <(b) (6)>

> Date: Thu, July 8, 2010 6:57 pm

> To: (b) (6)

> --
> -----
>
>
> MBK,

> On two separate occasions, preceding and following the submission of
> my complaint, I asked if there were written guidelines for how the
> EOIR misconduct investigations were to be conducted. On two
> occasions, one of which was in June (I don't have the date on hand but
> it was following receipt of the report and is indicated in my
> contemporaneously typed notes), you told me there were no written
> guidelines specific to IJ misconduct investigations, only general
> supervisory or management protocols (again, the precise wording is in
> the notes I took, despite your admonitions otherwise).

> However, the document here "Summary of OCIJ Procedure for Handling
> Complaints Against Immigration Judges" indicates it was produced on
> May 17, 2010.
> <http://www.justice.gov/eoir/sibpages/IJConduct/IJComplaintProcess.pdf>

> Were you unaware of this document or its preparation or earlier
> versions when you twice told me that there were no written policies
> for IJ misconduct investigations?

> Thank you for your helping me understand this discrepancy.

> (b) (6)

> --
> (b) (6)

> (b) (6)

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> (b) (6)

> (b) (6)

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(b) (6)

(b) (6)

Keller, Mary Beth (EOIR)

From: (b) (6)
Sent: Tuesday, July 27, 2010 1:58 PM
To: Keller, Mary Beth (EOIR)
Subject: RE: [Fwd: Question about Document Discrepancy]

Dear MaryBeth Keller,

Can you please send me a copy of your notes? I have a right to these under the Privacy Act.

Thank you.

(b) (6)

Duplicate

Duplicate

Keller, Mary Beth (EOIR)

From: (b) (6)
Sent: Tuesday, July 27, 2010 3:36 PM
To: Keller, Mary Beth (EOIR)
Subject: Notes on our conversation(s)

Dear MaryBeth Keller,

For purposes of verification and authentication it would be helpful to know whether the notes you took on June 10, 2010 were typed or hand-written. For these purposes an immediate response would be most useful.

Thank you.

(b) (6)

--
(b) (6)

Moutinho, Deborah (EOIR)

From: Keller, Mary Beth (EOIR)
Sent: Wednesday, June 09, 2010 9:38 AM
To: Smith, Gary (EOIR)
Cc: Moutinho, Deborah (EOIR)
Subject: FW: Smith memorandum regarding my complaint against William Cassidy

fyi

-----Original Message-----

From: Keller, Mary Beth (EOIR)
Sent: Wednesday, June 09, 2010 9:38 AM
To: (b) (6)
Subject: RE: Smith memorandum regarding my complaint against William Cassidy

Good morning - I have seen a copy.
I am tied up most of the day today; but free all day tomorrow if you would like to talk further.
mtk

-----Original Message-----

From: (b) (6)
Sent: Tuesday, June 08, 2010 6:38 PM
To: Keller, Mary Beth (EOIR)
Subject: Smith memorandum regarding my complaint against William Cassidy

Have you seen a copy of it? Any chance we can talk tomorrow? Thanks!

Oh, and just to clarify the new email address, I have accepted a job offer at

(b) (6)

Phone call w/ (b) (6) – June 10, 2010

She had a number of questions for me that she wanted to “get through”

1. Had I seen the Gary Smith letter ? I told her yes.
2. Who else had seen it? I told her that no one else was cc'd, so I didn't have an answer to that. I told her that we often provide complaints to the judge, as well as resolutions, but that Judge Smith was out of the office until next week.
3. Did I write the response? No.
4. To whom did Gary Smith speak? I told her I didn't have the details, but was aware that he had spoken to the judge and court staff, security personnel, and whomever he else he felt it necessary to speak in order to look into and address her concerns.
5. She asked about whether I thought he had adequately addressed her concerns regarding Oct 7, 2009, and referred to a “cover up” of his “pattern”. At that point I told her that Judge Smith addressed (b) (6) complaints re the April 2010 incident and surrounding issues which she had subsequently talked on the phone with me about. She said she thought the Oct 2009 hearing was part of “the surrounding issue” and I told her that if there was a miscommunication regarding the nature of her current complaint, I would appreciate her putting that in writing in order to avoid further miscommunication.
6. Did I anticipate that Judge Smith would be in touch w/ her and did I recall telling her that he would call? I advised her that I did tell her Judge Smith would be in touch. I told her that depending on the issue raised, it is sometimes resolved without discussing further with the complainant.

I did ask her at that point if she was typing what I was saying, and if I would appear on her blog (!) – I advised her that I was not the official spokesperson for EOIR, but was instead simply trying to help her get her complaint resolved.

7. She asked whether there was a manual on how we conduct investigations and I told her no, there was nothing in writing other than our general internal management processes which we use to resolve all manner of problems brought to our attention on a daily basis.

8. She asked me if I thought that Judge Smith's letter was “fair,” to which I responded that if she was not satisfied that I had accurately conveyed her concerns to Judge Smith, or, if she was not satisfied with Judge Smith's resolution, I would be happy to receive her articulation of those concerns in writing, again. She said that Judge Smith's factual account in his letter was “a lie” and that EOIR employees answering questions from their supervisors can't be expected to be candid. She said that Judge Cassidy had lied before, and would ultimately get caught. I told her that I didn't agree with that, and that her option if she isn't satisfied with EOIR, is OPR, which handles matters regarding professional misconduct of any Department attorney. She indicated that she had just discovered that and would likely be going there.

She indicated that she would follow up with some questions for me.

We talked some about transparency, and I pointed her to our website, and explained the page that would contain statistics in the near future.

She also complained about our Public Affairs office, as well as the general approach of not allowing public employees to talk to the media.

She invited me to have lunch with her, on or off the record, during an upcoming trip to DC.

Despite the nature of her comments and the above summary, the conversation remained cordial throughout.

(b) (6)

(b) (6)

5.03.10
phone

What's up?

file another complaint?

(b) (6)

since doesn't have atty
back 2 (b) (6)

4 various reasons can't get
back in

Hrgs cancelled on Feb 11, 2010 bc VTC
not wke
But Cassidy in blog

(b) (6)

asked if cld chg
venue

He wrote a c of v & Cass got it -

I saw this guy's hrg (b) (6)

ICE doesn't give respnds he

213s

He asked 4 it

in file

no Contd
Sero.)

why tell ICE wife in Jamaica?
(on 213)? I didn't see it,
slipped through LOP, too.

(b) (6)

will not give any info re bad
at master

Inmates: range w/sec. guys.
(b) (6) = worst

Staff at (b) (6) horrible all down
the line

Guard followed me 19th

I had 2 ck in / says which of

Disparities b/w (b) (6)

in there & not when they know

NTK clar. leave a public lobby!
(w/ky area 4 EDR office)

handcuffs / hiding name
pushed me - I was walking!

(b) (6)

law - misd. battery

then I left

showing
off?

Cassidy was get her out of here. (4)
(out of blob)

Complaints

Not closed out

(b) (5)

(b) (5)

Conv's w/ EOIR & FPS

Lauren Alder-Reid w/in hours
of situation

it's FPS → under auth of
EOIR

not under his auth → (b) (6)

treat his as compet. (b) (6)

✓ Not even occurred

⊗ What he told guards.

hiding him from me
said low M & Fri
should MON!

→ VTC went out.
Cancel?! the trial.
Atty reg'd re-boot ~ he did.

Sat Morn w/ lawyers in a.m.
Came back aft. lunch

Issues for AILA & appeal
not the focus of my complt.

Judge asked me, have / asked why
(see my notes) don't have now
kept telling me 2 live

Closing w/ 100% denial rate!
Categorical Denial

→ R is pro se ~

I can have u removed.

4.19.10

Went 2 get ups
got surv → I left it
is it asy / said it *

I said
have 2 give a reason ~ she
said no.

I writing notes to record

In addition to phys assault
my research was interrupted

Other info not on the blog bc so
detailed

gone of 1st time there
Cass. sick

another time → atty, interp,
w/ R?
in 2 others

ok who in the room - unusual
front office room
asked for pol - doesn't exist I've
been told

(b) (6) → any hrs I bel'd her

very
nice

she told me 2 call pub. affairs
at Clark - name & affiliation

likes 2 know everyone here
problematic. but know what he does -
wasn't missed ^{some} insidious
about that.

None on dkt were any!

lawyer said it wasn't any
wife here
interp left - cancelled

FOIA req. EOIR not denying discr.
blw my info

left the only case they knew of
I already had!

Third time I went - Cassidy
out again mysteriously.

6.10.10

(*)

(b) (6)

6.10.10

→ cc'd to whom?
logically anyone else?
Smith → ? anyone else cc'd

1.

2.

Did you write? No
1st finish ?s

3.

To whom did he speak
Can I find out? ^{will} talk ^{man}
What happed Durus what I told
you

4.

Covering up / Oct 7, 2009
my understanding / Apr 9 surr events
Oct surring

"pattern"

5.

Smith never in touch

R u typing / blog?

not official spokesperson

ED/R

CR

(2)

6. u told me he was going
my understanding was that

→ my recollection he wld be in touch
w/ you
maybe / not

7. No Manual - or how to
conduct

8. Content of the memo -

9. Not satisfied ~ give again
factual inaccuracies in Judge Smith's
→ account

Stuttering ~ a lie
→ did he interview

→ CPR ?

→ Don't agree that EO 11 sup's
conflict in vest.

(3)

Cassidy has hid b4

I know - I was there
con is w/ interp. |

~~How~~ how make sense he
would pro s / on televideo
appears he's lying

Another pact ~

- Subst
- Unhappy

→ Who's seen?
→ 2 whom Smith space?

reg's out of
case

June 21 - lunch

→ nup int = pattern of bullying →