

1 Q And who is the cochairman of Global Crossing?

2 A Lod Cook.

3 Q Is that Sir Lod Cook?

4 A Yes. He was knighted by Queen Elizabeth.

5 Q He received the Knights of the British Empire, or
6 something to that effect?

7 A Yeah.

8 Q Who is William Cohen?

9 A He was a director -- wait. Yeah -- William Cohen was a
10 director.

11 Q He was on the board of directors as well?

12 A Yes.

13 Q And he used to be ex-Secretary of Defense?

14 A He was the Secretary of Defense for the United States.

15 Q Is it fair to say that the board of directors has pretty
16 powerful people on it?

17 A Yes.

18 Q And some of the contractors they hired were very powerful,
19 connected people as well; isn't that correct?

20 A Yes.

21 Q Do you know how much money Global Crossing paid in
22 political contributions to the parties?

23 MS. DUARTE: Objection to relevance, Your Honor.

24 THE COURT: Sustained.

25 BY MR. SUTCLIFFE:

1 Q Were there any other pictures of people within this
2 "evilgx" website?

3 A I don't recall.

4 Q Might there have been?

5 A There might have been.

6 Q Okay. To your knowledge, did anybody else complain about
7 having their picture on this website from within Global
8 Crossing?

9 A Not about pictures, no.

10 Q Now, as a lawyer, you work with contracts quite a bit; is
11 that correct?

12 A Yes.

13 Q In contracts, you have to define certain things; is that
14 correct?

15 A Yes.

16 Q So an employee, like Ann Bingham or Mr. Sutcliffe, coming
17 into Global Crossing, they would have to enter into a contract;
18 is that a fair statement?

19 A I don't think you had a contract when you were working as
20 a consultant. I think Global Crossing had a contract with
21 TriStaff, the consulting company, and they provided people for
22 the IT department.

23 Q But we're talking contracts here.

24 A Yes. I don't think you had a contract with Global
25 Crossing when you were in the IT department --

1 Q Right.

2 A -- initially.

3 Q But upon becoming an employee, one would have to enter
4 into a different type of contract?

5 A We didn't -- generally, we didn't do employment contracts.
6 Global Crossing just did offer letters and people would sign
7 that they accepted the offer.

8 Q Now, Mr. Saly, we talked about him earlier, he was, at one
9 point, a contractor; is that not true?

10 A That may be true. I think that's true, yeah.

11 Q And Global Crossing employed him through a contract
12 directly --

13 A Correct.

14 Q -- as an independent contractor?

15 A Correct.

16 Q And before you come in -- before you enter into employment
17 with Global Crossing, you enter into a contract; and in that
18 contract, it defines certain words and terms; is that not a
19 fair statement?

20 A It may.

21 Q It may or it may not. Okay.

22 And as a lawyer, part of your job is to examine
23 contracts; is that a fair statement?

24 A That's correct.

25 Q And are contracts usually binding?

1 THE COURT: We don't need to have a course in
2 Contracts 101 in law school, Mr. Sutcliffe. Please get to the
3 point.

4 MR. SUTCLIFFE: Thank you, Your Honor.

5 Q To your knowledge, has Global Crossing ever forced anybody
6 to enter into a contract with them?

7 A No.

8 Q To your knowledge, has Global Crossing ever imposed
9 themselves upon anybody to make them enter into a contract with
10 them?

11 A No.

12 MR. SUTCLIFFE: Now, Your Honor, at this point, the
13 defense would like to have Exhibit 23 from the government so I
14 can bring it up on the screen, if that would please the Court.

15 THE COURT: Is that in evidence?

16 MR. SUTCLIFFE: Yes.

17 MS. DUARTE: Yes, it is, Your Honor.

18 THE COURT: You can bring it up yourself, can't you?
19 Give the disk to him.

20 MR. SUTCLIFFE: I'm going to have to locate this file
21 now. One second, please.

22 THE COURT: All right.

23 MR. SUTCLIFFE: I'm at a loss, Your Honor. I need
24 the assistance of the government here to locate this index
25 file. Perhaps they could point me in the right direction.