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Valarie, Cynthia and Frank

"OUR MISSION IS TO EXCEL IN HELPING YOU PROCESS YOUR CLAIM"

May 19, 2011

To: U.S. Nuclear Regulatory Commission
U.S. Department of Energy
United States Enrichment Corporation

Re: Public Comments on the U.S. Nuclear Commission's Decertification
Process Public Meeting at Piketon, Ohio

Ladies and Gentlemen:

1) Request for an Independent Investigation of Your Agency's Malfeasance, Misfeasance and Non Feasance in Operation of Portsmouth Gaseous Diffusion Plant at Piketon, Ohio as it Relates to Employee Safety And Exposures to Radiation and Toxic Chemical Substances

2) Request for Action to Claw Back Fees to the United States of America that Were Paid Under Management Contract for Operation of the Portsmouth Gaseous Diffusion Plant at Piketon, Ohio, for Contract Violations Relating to Safety And Exposure to Radiation and Toxic Chemical Substances

3) Request that Contract for Decertification be Contingent Upon Full Disclosure of Past Employee Exposures to Radiation And Toxic Chemical Substances And the Production of all Records That are Being Concealed or Filed So Employee Can't Find It

4) Request That the Proposed Agreement being Required for Employees that Seals the Lips of What Happened in Criminal Activity and the Hiding of Radiation and Toxic Exposures Under Plant Managers of the Portsmouth Gaseous Diffusion Plant is Against Public Policy And Should Not be Required To Resign with New Plant Management

May 19, 2011

Page 2

The above requests are being forwarded to you at the request of J [REDACTED] W [REDACTED], a security guard injured on July 26, 1994, and C [REDACTED] L [REDACTED], a security guard who was the union elected safety officer for the guards' union as well as being a Certified Trained Occupational and Safety Investigator who investigated the injury to J [REDACTED] W [REDACTED].

This is based on their investigation and their discovery of extensive documented facts that appear to be pure criminal activity by the Portsmouth Gaseous Diffusion Plant management and its staff while it operated the Portsmouth plant. There were various thwarted investigations which reviewed the facts and in discussions said there was a criminal conspiracy and criminal wrongdoing, but these findings were ordered deleted in the official final reports by the undue influence of corporate management.

These security guards have placed in my possession about 900 pages of documents that show and tie together what appears to be a major criminal conspiracy by a corporate culture of greed to protect the money interests of the corporation and its agents who operated the Portsmouth Gaseous Diffusion Plant at Piketon, Ohio, without required regard to the health and safety of its employees per its contract with the Department of Energy.

The above security guards agreed for me to conduct a four hour video sworn statement under oath with 42 exhibits that fully document and detail the facts of a criminal conspiracy. A certified copy of the transcript, along with the 42 exhibits, has been submitted to United States Attorney General Eric H. Holder Jr. for his review with a request to show why he should seek a Grand Jury investigation and also pursue an action for the return of moneys for such illegal activities that were in violation of the contract with the U. S. government.

Names and addresses of those who should be required to give statements under oath who have knowledge of facts to verify the information and what they would testify to is being gathered together and would be provided to assist you upon your request for such. Most of the witnesses would be willing to give testimony as to the truth of the facts to document the criminal conspiracy, but since some are still employees, they will only testify under a subpoena for fear of retaliation. Those who appear to have committed acts of criminal conspiracy should also be subpoenaed to explain the actions and to admit or deny or take the fifth not to testify as it may incriminate them and to be required to reveal where the records are kept of employee exposures to radiation and toxic chemical substances.

The best way for you to quickly review the facts of the appeared criminal conspiracy and criminal acts is through a case study of an injury to J [REDACTED] W [REDACTED] and the results of an investigation as to his injury by C [REDACTED] L [REDACTED].

The example of the conspiracy efforts to cover up radiation and toxic chemical substance exposures will demonstrate how the corporation, through its management

and supervisory staff, reacted to J [REDACTED] W [REDACTED]'s injury from toxic chemicals and radioactive substances while serving as a security guard at the Portsmouth Gaseous Diffusion Plant at Piketon, Ohio, in Building X-326 at Cell 25-7 that processed the highest level of enrichment up to weapon-grade material of over 97% enrichment on July 26, 1994.

Mr. W [REDACTED] was injured when piping was clogged due to uranium turning to a solid and clinging to the walls of the pipe causing what is known as a "slow cooker" that throws off high radiation energy neutrons. The management, with no notice to security guards as was required by plant safety rules, proceeded to convert the blockage back to a gas "shot the cell" with a secret mixture of 26 highly corrosive and toxic chemicals that leaked down on Mr. W [REDACTED]. His face and hands immediately turned red and were burning, and he was having difficulty breathing and was becoming disoriented. He was taken to the plant dispensary and was treated by placing ice and alcohol on him.

He was then ordered to return to work to finish out his shift as the plant was short of security guards without any concern for the health of Mr. W [REDACTED]. After work he then went to his wife's employment to switch cars after his shift and was feeling terrible and spitting up from the mouth his lung tissue. His wife took him to the Emergency Room of Southern Ohio Medical Center where she worked for treatment and he was immediately admitted to the hospital after the doctor called the poison control center and was told to admit that man at once as he was in great danger.

Details of the incident and plant management reaction from the J [REDACTED] W [REDACTED] interview are attached from the interview given in the S C & A investigation which is attached as **Exhibit 1**.

The corporate culture of the plant was to cover up exposures and radiation exposures so no injury claims would have to be reported to nuclear regulators, Occupational and Safety authorities, and the Department of Energy as required by law and the management contract.

The plant used these illegal and criminal methods to fight the claim.

- 1) They claimed he was not hurt on the job, and it must have been some chemicals he was exposed to at his home while caring for his pool. He did not have a pool.
- 2) The plant ordered his radiation record for external radiation to be reduced to zero as it might be a "court case" **and would not give the chemicals to which he was exposed to his treating physicians.**
- 3) They fought his Workers' Compensation claim and used false information to support the plant's case to deny compensation.
- 4) The plant even created a false log book to prove he was not injured at the plant site.

- 5) His medical records at the plant dispensary were altered to support the plant position.
- 6) Threats of injury were made to Mr. W [REDACTED] and his family if he continued with his claim as well as to C [REDACTED]. L [REDACTED], a certified OSHA inspector. Testimony of other threats and intimidation that were used are in the four hour deposition.
- 7) When Mr. W [REDACTED] testified before a United States Senate panel, the plant gave false and misleading information that there was only one badge changed and withheld records to further mislead the Senators of facts as management altered thousands of employee badges to show low or no exposure to radiation full well knowing the information was false.
- 8) The plant deliberately kept dosimetry readings separate from bioassay urine tests so the extent of external and internal exposures would not be connected or added together to show the full extent of radiation doses and concealed records of exposures.
- 9) In a subsequent NIOSH investigation they destroyed records to cover up dosimetry records where they would have a high reading but would record it as zero while the investigators were on the plant site which was contrary to its duty to preserve records.
- 10) The plant would reward those who assisted in a cover up with promotions and raises and bonuses or would make threats of being fired to keep the plant in line with corporate policy that no one was injured at the plant site from radiation and toxic chemicals.
- 11) The plant concealed known danger of neutron radiation exposures to its employees, and neutron exposures were not included in doses of radiation from employment.
- 12) Plant management would by-pass or disconnect warning alarms and use rubber bands to keep gamma criticality radiation alarms from sounding.
- 13) Required random bioassay reports of guards would be given when guards would have been off work for three day weekends and vacations to minimize radiation exposure readings to get clean readings.
- 14) The plant would modify dosimetry records for uranium handlers, security guards and instrument mechanics known as "RAD" workers by putting zero as the reading or by a "**bucket dose**" where they would use administration, employees and non-production workers so that "RAD" workers' exposures could spread out a high dose to a "RAD" worker so records would always show little or no external radiation exposure to those most exposed to radiation.
- 15) The plant also concealed known arsenic and neutron exposure to its employees.
- 16) The plant continues to reveal known radiation and exposure documents under names such as "Non Conformance Report" and "Problem Reports" which I just discovered, but such reports have not been provided to claimants so as to reveal their true exposures.

Discovery of a lot of documents were obtained through J [REDACTED] W [REDACTED]'s Federal Qui Tam suit under the Federal False Claims Act that was designed to curtail fraud and abuse and is commonly known as a "**whistleblower**" case.

Another source of documents was obtained from a discrimination lawsuit filed by L [REDACTED] S [REDACTED] on January 31, 1994, and the depositions taken in that case. **SEE Exhibit 3** where it is revealed that falsification of dosimetry records was part of the corporate policy to show low or no exposure to radiation to all plant employees as a regular practice.

A sample of threats made by plant management is attached in the form of an Affidavit dated April 28, 2011, of C [REDACTED] L [REDACTED] who investigated the J [REDACTED] W [REDACTED] injury. SEE Exhibit 2.

The dose rate was also influenced by not considering the "minimum" detectible level of radiation per the news article from *The Knoxville News-Sentinel* on November 4, 1996.

The plant was delinquent in urinalysis analysis reports in 1994.

An example as to how these actions adversely impacts EEOICPA claims is through injured security guard, P [REDACTED] B [REDACTED], who made a claim for prostate cancer. NIOSH decreased the probability of his prostate cancer from 31.21%, then reduced it to 11.984% and again reduced probability to 5.74% probability in its last dose reconstruction. His records show how false radiation exposures work to deny claims under the Energy Employees Occupational Illness Compensation Program Act and in support of how NIOSH operated is demonstrated in his case due to the concealment of records.

SUMMARY

Atomic plant workers, known as Cold War Patriots, performed their duties under total secrecy to protect the United States without the benefit of knowledge of the toxic hazards of exposure to radiation and toxic chemicals and the plant was built under budget and ahead of schedule.

The nuclear industry plant management was not held to the same standards and regulations of all other businesses and industries in the United States of America that were designed to protect their workers and our environment from diseases from deadly, silent radiation and toxic chemical substances.

The National Institute of Occupational Safety and Health, known as NIOSH, has been declared to be a "king" by our country and can do no wrong or be challenged by the Court for their use of known false dose reconstruction.

The President of the United States has ordered the government to be **transparent**, but NIOSH still keeps its methods of dose reconstruction secret which further allows the criminal conspiracy to continue forward.

May 19, 2011

Page 6

When you object to a NIOSH dose reconstruction calculation and denial of your cancer claim, the hearing officer, before receiving any testimony and evidence will read the following statement:

"At this time, I would like to say something about the NIOSH dose reconstruction. NIOSH is given full authority under the regulations that govern the act to conduct dose reconstruction use by the Department of Labor to determine the probability that a cancer is related to employment. I am, therefore, not in a position to discuss the way in which NIOSH goes about preparing the dose reconstruction. However, I can discuss issues of a factual nature regarding information to NIOSH but not any challengers to the application of NIOSH methodology."

My first reaction is you lose your case before it begins and I'm here to take your objections and to enter them into the evidence of record, but as the hearing representative states, I'm not permitted to consider objections to NIOSH's methodology at this time. In my opinion the no challenge secret rule is arbitrary, capricious and unconstitutional.

In my opinion NIOSH generally includes words like they overestimated your radiation exposure and looked at facts in a "claimant friendly manner." These are words designed to falsely indicate to workers that NIOSH did all it could to help workers when, in fact, it is a code for "you lost --- go away; if you come back, we will make your probability less than what it was before."

I am asking each entity to make a completely independent investigation and then you can proceed with your decertification process after a full and complete investigation.

I feel it is my duty as an attorney at law to bring these facts that I have accumulated in representing injured atomic workers since December 27, 2005, as the facts in the transcript of a four hour deposition of J [REDACTED] W [REDACTED] and C [REDACTED] L [REDACTED] along with about 900 pages of supporting documents submitted to me fully justify this request. This will allow all the Cold War Patriots to be treated fairly based on true facts and not lies.

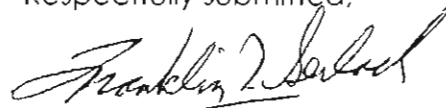
Those who appeared to have been wrongdoers or witnesses with knowledge of wrongdoing should be required to give sworn statements to your entity to preserve evidence of wrongdoing.

As a taxpayer and citizen it is also urged that you review management contracts and exercise the contract right of the U.S. government to claw back fees paid to plant operators for failure to follow and meet contractual obligations.

May 19, 2011
Page 7

Signed at Portsmouth, Ohio, this 19th day of May, 2011.

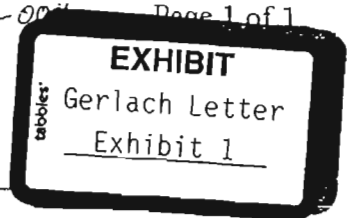
Respectfully submitted,

A handwritten signature in black ink that reads "Franklin T. Gerlach". The signature is written in a cursive style with a horizontal line underneath the name.

Franklin T. Gerlach
Attorney at Law
And as the Authorized
Representative of 541
Claimants Seeking Benefits
Under the Energy Employees
Occupational Illness
Compensation Program Act
814 Seventh Street
Portsmouth, Ohio 45662
Phone 740.354.7755

FTG/jal

Copy: News Media Present



Adkins Jr, David L

From: [Redacted]
Sent: Friday, September 28, 2007 3:03 PM
To: [Redacted]
Cc: A [Redacted] J [Redacted]
Subject: SC&A Interview Summary on Portsmouth Incident
Attachments: W [Redacted] Interview Input_.doc

Hello J [Redacted]

Sanford Cohen and Associates, Inc. (SC&A) has completed a summary from the interview conducted with you at the Portsmouth site. The summary is specific to the July 1994 incident. Other information provided will be forthcoming in a separate summary. The summary is not intended to be a verbatim transcript of the interview, but serves as a representation of the interview. As a part of making sure the summary is accurate, we are supplying those interviewed with the opportunity to provide comments. Any corrections recommended should be forwarded to me at the address below or via email. These corrections will be reflected in the final master summary. There are highlighted areas within the text where I need clarification or possibly correction.

Sincerely,

[Redacted]
SC&A Site Profile Review Team
[Redacted]

Site Expert Interview Summary
J. W. Incident

Organization: Security

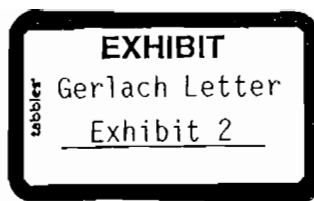
Significant concerns have been raised regarding the documentation of serious incidents at Portsmouth. On July 26, 1994 during day shift, an incident involving two security personnel occurred while cells were being shot. Two guards were assigned to the X-326 L cages at the Local Control Cabinet withdraw cabinets (sampling point). The post was situated immediately above (~12 feet) Cells 2507-2518. This area was designated to handle Category I assay material. The cells were being shot during the incident. The process of shooting a cell involved forcing COF₃ through the process system to unclog uranium build ups. In accordance with procedures, individuals were to be notified when the cells were shot so they could take appropriate protective measures. In this particular case, the officers were not notified that this was to occur. During the shots, operations wore fresh air respirators. When shots were performed, the cells exceeded atmospheric pressure causing a leak. Materials were forced upward past the above duty station. The exact content of the material released was unknown. At the time the Argon Gamma Radiation monitor went off.

The two guards felt a usual pressure pass over them and became disoriented. They exited the area and notified supervision. Safety staff was sent in to sampling the atmosphere for potential hazards following the release. The first guard was told to wash his face and sent back to the duty station immediately. The other guard was sent to Medical for evaluation and treatment for difficulty breathing and burning all over. After the completion of the onsite medical evaluation he was sent back to work. A bioassay sample was collected approximately two hours following the incident. The site expert did not know what the sample was analyzed for. No blood samples were taken following the incident. He was left on the job until 3:00 pm although he continued to feel disoriented. By the end of the shift his face was peeling and he had lost his voice.

The second guard stopped to trade cars with his wife at a local hospital on the way home. Upon seeing his condition, a call was placed to the Poison Control Center and hospital staff admitted him for treatment immediately. By this time his lungs began to shut down. The face and lungs were burned and crystalline structures were formed in the lungs causing the difficulty in breathing. The individual was treated at the local hospital. While at the hospital, the company public relations representative called to verify that the individual was okay.

Several company and DOE sponsored investigations were conducted with a determination that nothing had occurred. MMES conducted an investigation which indicated there were problems associated with the dosimetry program. The Inspector General indicated that the record of the guard involved in the incident had been changed but that this was an isolated occurrence. In the meantime, meetings between the guard's supervision and plant management resulted in a heated argument where the guards were

AFFIDAVIT



STATE OF OHIO
COUNTY OF SCIOTO, ss:

C [REDACTED] L [REDACTED], first being duly sworn, states as follows:

H [REDACTED] P [REDACTED] and I were asked to attend a meeting about the dosimeter badges in the office of G [REDACTED] M [REDACTED]. There were three other men in his office. We were told one was from Paducah, Kentucky; one was from Oak Ridge, Tennessee; and the third man was T [REDACTED] T [REDACTED].

A secretary for G [REDACTED] S [REDACTED], who was over the safety department, came into G [REDACTED] M [REDACTED]' office and stated that Mr. S [REDACTED] needed to talk with H [REDACTED]. H [REDACTED] told her we are just about to start our meeting. She then stated "G [REDACTED] (S [REDACTED]) needs to talk to you right now." G [REDACTED] M [REDACTED] told H [REDACTED] to go ahead and he would wait till he got back. H [REDACTED] got up and walked out of the office.

G [REDACTED] M [REDACTED] looked out through the open door to see if H [REDACTED] was gone. He then turned and looked me in the eye. He then poked me in the chest and said "Who do you think you are messing with? Don't you realize Lockheed Martin is a first strike company?" I responded "What are you talking about?" G [REDACTED] M [REDACTED] then said to me "Lockheed Martin is the largest independent contractor in the world. We have 50% of Congress and Senate in our pockets. You ever hear of Karen Silkwood?" I answered I had seen the movie. G [REDACTED] M [REDACTED] then stated to me "We made her disappear. We're going to make you disappear." I asked H [REDACTED] P [REDACTED] who was outside the open door "Did you hear what he (I was pointing at G [REDACTED] M [REDACTED]) just said?" What M [REDACTED] couldn't see is H [REDACTED] was stopped by a co-worker who wanted to ask a question. H [REDACTED] never left the area outside the door. H [REDACTED] P [REDACTED] said "They are going to kill you." I looked at M [REDACTED] and said "I guess this meeting is over."

H [REDACTED] and I went downstairs to the Local 66 union office. I then asked H [REDACTED] to tell our union president, T [REDACTED] D [REDACTED], and J [REDACTED] G [REDACTED], our vice president, what G [REDACTED] M [REDACTED] had just related to me. H [REDACTED] then told them that M [REDACTED] (Lockheed Martin) was going to "make me disappear. They're going to kill C [REDACTED]." This took place at the time of my dosimeter investigation.


I received many death threats to myself and to my family. I was told that my house would be burned down with my family in it. I would get phone calls while I was working with a man's voice saying they were "going to rape my wife and daughter and then kill them and my boys." My supervisor would make comments pointing at me and saying to the other police officers "There's the guy who's going to cost you your job. He's going to shut the plant down. You will be picking up pop cans alongside the road." This treatment went on for years.

Further, the affiant sayeth naught.



Sworn to before me and subscribed in my presence this 28th day of April, 2011, at
Portsmouth, Ohio.




Notary Public, State of Ohio
My Commission Expires June 11, 2014

1 UNITED STATES DISTRICT COURT
 2 SOUTHERN DISTRICT OF OHIO
 3 EASTERN DIVISION
 4 - - -
 5
 6 [REDACTED] W. [REDACTED] ET AL., :
 7 PLAINTIFFS, :
 8 VS. : CASE NO. C2-96-722
 9 : JUDGE SARGUS
 10 LOCKHEED MARTIN CORPORATION, ET AL., :
 11 DEFENDANTS. :
 12 - - -
 13
 14 DEPOSITION OF
 15 [REDACTED] [REDACTED]
 16 APRIL 22, 1997
 17 - - -
 18
 19
 20
 21
 22 E & A REPORTING SERVICE, INC.
 23 915 SOUTH FRONT STREET
 24 COLUMBUS, OHIO 43206
 (614) 445-6300

1 - - -
 2 DEPOSITION OF [REDACTED] [REDACTED] A WITNESS
 3 CALLED BY THE PLAINTIFFS AS IF UPON CROSS-EXAMINATION,
 4 TAKEN BEFORE ME, D. [REDACTED] [REDACTED] A PROFESSIONAL
 5 REPORTER AND NOTARY PUBLIC WITHIN AND FOR THE STATE OF
 6 OHIO, AT THE PIKE COUNTY COURTHOUSE, 100 EAST 2ND
 7 STREET, WAVERLY, OHIO, COMMENCING AT 10:02 A.M., SAID
 8 DEPOSITION TAKEN PURSUANT TO THE STIPULATIONS OF
 9 COUNSEL HEREINAFTER SET FORTH.
 10 - - -
 11 APPEARANCES:
 12 STEVE J. EDWARDS, ESQ., 4030 BROADWAY,
 13 GROVE CITY, OHIO 43123, APPEARING ON BEHALF OF THE
 14 PLAINTIFFS.
 15 ROBERT E. TAIT, ESQ., OF THE LAW FIRM OF
 16 VORYS, SATER, SEYMOUR AND PEASE, 52 EAST GAY STREET,
 17 COLUMBUS, OHIO 43215; AND JAMES S. OLSEN, CHIEF
 18 COUNSEL, LOCKHEED MARTIN UTILITY SERVICES, INC., P.O.
 19 BOX 628, PIKETON, OHIO 45661, APPEARING ON BEHALF OF
 20 THE DEFENDANTS.
 21
 22 ALSO PRESENT: [REDACTED] W. [REDACTED]
 23 - - -
 24

Page 3
 1 STIPULATIONS
 2 - - -
 3 IT IS AGREED AND STIPULATED BY AND
 4 BETWEEN COUNSEL FOR THE RESPECTIVE PARTIES HEREIN
 5 THAT THIS DEPOSITION MAY BE TAKEN IN SHORTHAND BY
 6 DENISE M. SHANE, WHO MAY LATER, OUT OF THE PRESENCE
 7 OF THE WITNESS, TRANSCRIBE OR CAUSE SAID SHORTHAND
 8 NOTES TO BE TRANSCRIBED; THAT THE FORMALITIES AS TO
 9 THE TIME AND PLACE OF THE TAKING OF THE DEPOSITION
 10 ARE PURSUANT TO NOTICE; AND THAT THE QUALIFICATIONS
 11 OF THE OFFICER BEFORE WHOM TAKEN SHALL BE EXPRESSLY
 12 WAIVED.
 13 - - -
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Page 4
 1 TABLE OF CONTENTS
 2
 3 EXAMINER TYPE PAGE
 4 MR. EDWARDS CROSS-EXAMINATION 5
 5 MR. TAIT CROSS-EXAMINATION 34
 6 - - -
 7
 8
 9
 10
 11
 12
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 14
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EXHIBIT
 Gerlach Letter
 Exhibit 3

Page 5

1 THEREUPON,
2 [REDACTED]
3 BEING BY ME FIRST DULY SWORN,
4 AS HEREINAFTER CERTIFIED,
5 TESTIFIES AS FOLLOWS:
6 CROSS-EXAMINATION
7 BY MR. EDWARDS:
8 Q WOULD YOU STATE YOUR FULL NAME, PLEASE.
9 A [REDACTED]
10 Q [REDACTED], MY NAME IS STEVE EDWARDS. I
11 INTRODUCED MYSELF JUST BRIEFLY OFF THE RECORD. I'M AN
12 ATTORNEY AND I REPRESENT [REDACTED] W [REDACTED] IN A LAWSUIT
13 THAT'S PRESENTLY PENDING AGAINST LOCKHEED MARTIN
14 UTILITY SERVICES. I'M HERE TODAY TO ASK YOU A FEW
15 QUESTIONS. IF AT ANY TIME DURING THE DEPOSITION YOU
16 DON'T UNDERSTAND MY QUESTIONS, WOULD YOU LET ME KNOW
17 VERBALLY SO I CAN REPHRASE IT OR MAKE IT MORE CLEAR?
18 A YES, I WILL.
19 Q IF AT ANY TIME YOU WANT TO TAKE A BREAK FOR
20 ANY REASON, I'LL BE HAPPY TO DO THAT.
21 A OKAY.
22 Q IF YOU DON'T UNDERSTAND SOMETHING OR
23 SOMETHING LIKE THAT, JUST LET ME KNOW. I'M NOT HERE
24 TO TRICK YOU. I JUST WANT TO GET A FEW FACTS.

Page 6

1 WOULD YOU STATE YOUR AGE.
2 A 53.
3 Q YOUR DATE OF BIRTH?
4 A [REDACTED]
5 Q YOUR SOCIAL SECURITY NUMBER?
6 A [REDACTED]
7 Q WHAT'S YOUR PRESENT RESIDENCE ADDRESS?
8 A MAILING ADDRESS?
9 Q YES.
10 A I HAVE TWO. IT'S [REDACTED]
[REDACTED]
12 Q ARE YOU PRESENTLY MARRIED?
13 A NO.
14 Q COULD YOU BRIEFLY TELL ME, DO YOU HAVE ANY
15 EDUCATION BEYOND HIGH SCHOOL?
16 A YES, I DO. I HOLD TWO ASSOCIATE DEGREES,
17 ONE IN COMPUTER ADMINISTRATION AND ONE'S A MEDICAL.
18 Q WHERE FROM?
19 A SHAWNEE STATE.
20 Q WHO ARE YOU PRESENTLY EMPLOYED BY?
21 A LOCKHEED MARTIN.
22 Q HOW LONG -- WHERE ARE YOU EMPLOYED AT?
23 A IN THE DOSIMETRY LAB, HEALTH PHYSICS.
24 Q THAT'S AT THE PLANT THERE?

Page 7

1 A IN PIKETON, YES.
2 Q HOW LONG HAVE YOU BEEN EMPLOYED AT THAT
3 PLANT?
4 A SINCE JANUARY 2ND, 1980.
5 Q WHERE WERE YOU EMPLOYED AT PRIOR TO THAT
6 TIME?
7 A SCIOTO MEMORIAL HOSPITAL, AS A LAB TECH.
8 Q HOW LONG WERE YOU EMPLOYED THERE?
9 A PROBABLY ABOUT, ANYWHERE FROM FOUR TO SIX
10 MONTHS, RIGHT AFTER MY RESIDENCY WHEN I GOT OUT OF
11 COLLEGE.
12 Q OKAY. SINCE YOU HAVE BEEN EMPLOYED AT
13 PIKETON, HAVE YOU ALWAYS WORKED IN THE HEALTH PHYSICS?
14 A YES, SIR.
15 Q HAVE YOU PRETTY MUCH HELD THE SAME JOB
16 SINCE 1980?
17 A I WORKED TWO YEARS AS A HEALTH PHYSICS
18 SURVEYOR GOING OUT IN THE FIELD.
19 Q AFTER THOSE TWO YEARS, YOU HAVE BEEN IN
20 YOUR PRESENT JOB PRETTY MUCH?
21 A YES, SIR.
22 Q I HAVE TO ASK YOU THIS. HAVE YOU EVER BEEN
23 CONVICTED OF A FELONY OR MISDEMEANOR OTHER THAN A
24 TRAFFIC OFFENSE?

Page 8

1 A NO.
2 Q HAVE YOU EVER BEEN DEPOSED BEFORE IN A
3 SITUATION LIKE THIS?
4 A YES, SIR.
5 Q HOW MANY TIMES?
6 A TWICE, I THINK.
7 Q OKAY. I'M HERE TO ASK YOU SOME QUESTIONS
8 IN CONNECTION WITH [REDACTED] W [REDACTED]'S DOSAGE READINGS AT
9 THE PIKETON PLANT. HAVE YOU EVER GIVEN A STATEMENT
10 BEFORE TODAY ON THAT SUBJECT MATTER?
11 A YES, I HAVE.
12 Q HOW MANY DIFFERENT TIMES, DO YOU RECALL?
13 A TWICE, I THINK.
14 Q WHO DID YOU GIVE THOSE STATEMENTS TO?
15 A [REDACTED]
16 Q ARE THOSE BOTH EMPLOYEES AT THE PLANT IN
17 PIKETON?
18 A YES, SIR.
19 Q WHAT IS YOUR TITLE TODAY AT YOUR JOB?
20 A HEALTH PHYSICS TECHNOLOGIST.
21 Q WHAT ARE THE RESPONSIBILITIES OF YOUR JOB?
22 A I'M GROUP LEADER. I TRAIN THE PEOPLE UNDER
23 ME TO READ THE DOSES AND RUN THE MACHINES.
24 Q HOW LONG HAVE YOU HELD THAT JOB AS A GROUP

Page 9

1 LEADER?
2 A AS A GROUP LEADER, PROBABLY TWO YEARS.
3 Q DID YOU RECEIVE A PROMOTION? LET ME
4 REPHRASE THAT QUESTION.
5 DID -- WERE YOU PROMOTED OR DID YOU GAIN --
6 A NO.
7 Q OKAY. YOU SAID YOU TRAIN PEOPLE TO READ.
8 A TO READ THE CARDS, USE THE MACHINES.
9 Q OKAY. ALL RIGHT. WHO IS YOUR IMMEDIATE
10 SUPERVISOR?
11 A M ██████████ ██████████
12 Q HOW LONG HAS SHE BEEN YOUR SUPERVISOR?
13 A IT'S NOT BEEN QUITE A YEAR.
14 Q WHO WAS YOUR IMMEDIATE SUPERVISOR PRIOR TO
15 HER?
16 A F ██████████ ██████████
17 Q AND WHO WAS YOUR HEAD SUPERVISOR BEFORE
18 F ██████████ ██████████?
19 A F ██████████ ██████████. I'M SORRY. I SAID F ██████████ ██████████.
20 IT'S M ██████████ ██████████. I'M SORRY. I GET THE S ██████████ ██████████ MESSED
21 UP.
22 Q WHAT IS THE TITLE OF THE PERSON WHO IS YOUR
23 HEAD SUPERVISOR NOW? WHAT'S THEIR TITLE?
24 A SUPERVISOR.

Page 10

1 Q JUST SUPERVISOR OF THE DOSIMETRY LAB?
2 A NO, WAIT A MINUTE. THEY DID CHANGE IT,
3 HEALTH PHYSICIST. THEY DID CHANGE IT. I'M SORRY.
4 Q SUPERVISOR OF THE HEALTH PHYSICS LAB?
5 A SHE IS A HEALTH PHYSICIST 1 OR 2, HEALTH
6 PHYSICIST 1 OR 2, BUT SUPERVISOR OF THE DOSIMETRY LAB.
7 Q AS YOU INDICATED, YOU ARE THE GROUP LEADER
8 IN THE DOSIMETRY LAB.
9 A YEAH.
10 Q NOW, I HAVE SEEN THE TERM TLD IN
11 CONNECTION. WHAT DOES THAT MEAN TO YOU?
12 A TLD, IT'S THE THERMOLUMINESCENCE DOSIMETER.
13 I'M TRYING TO GET IT OUT. I HAVE A PROBLEM WITH THAT.
14 Q IS THAT THE BADGE?
15 A THAT'S RIGHT. THE CARD THAT GOES IN THE
16 BADGE.
17 Q OKAY. PRIOR TO BECOMING A GROUP LEADER,
18 DID YOU ACTUALLY READ THOSE CARDS AND INPUT THE DATA
19 INTO THE MACHINE?
20 A YES, SIR. I STILL DO.
21 Q TELL ME HOW THAT PROCESS WORKS. COULD YOU?
22 A WELL, WE HAVE A BADGE THAT'S A HOLDER THEY
23 INSERT THE TLD INTO. IT IS ASSIGNED TO A CERTAIN
24 PERSON BY BADGE NUMBER. THEY WEAR IT A CERTAIN AMOUNT

Page 11

1 OF TIME. WE DO QUARTERLY READS NOW. SO WHEN THAT
2 QUARTER IS UP, WE HAVE A BADGE CHANGE. WE TAKE THAT
3 ONE OUT AND READ IT AND ASSIGN A NEW ONE. IT'S PUT IN
4 THE 8800 AND GOES THROUGH WITH A HEADING, A SIGNAL,
5 YOU KNOW, READS IT AND TAKES OUT -- THE READOFF OF IT.
6 Q SO WHEN THE CARDS COME TO YOU, ARE THEY
7 STILL IN THESE BADGES?
8 A YES, SIR, THEY ARE.
9 Q DO YOU TAKE THEM OUT OF THE BADGES?
10 A YES, SIR.
11 Q AND THEN YOU PUT THEM IN THE MACHINE?
12 A UH-HUH.
13 Q AND THEN THE MACHINE ACTUALLY DOES THE
14 READING?
15 A YES. UH-HUH.
16 Q DOES IT GIVE A FIGURE?
17 A IT GIVES A RAW DATA FIGURE AT THE TIME IT
18 READS THOSE. IT QUOTES -- THERE'S MAGNETIC RHYTHMS
19 WHICH MANIPULATE THE BADGE AND ASSIGNS THE DOSE.
20 Q AND DOES A DOSE COME UP ON THE MACHINE?
21 A NO, JUST THE RAW READING.
22 Q HOW DO YOU GET THE DOSAGE FROM THE RAW
23 READING?
24 A WE RUN A MAG RHYTHM.

Page 12

1 Q IS THAT A SEPARATE MACHINE OR COMPUTER?
2 A PC, YES.
3 Q SO THE RAW DATA THAT COMES UP --
4 A IS PUT INTO A FILE.
5 Q OKAY. PUT INTO A FILE BY -- MANUALLY OR BY
6 COMPUTER?
7 A BY COMPUTER.
8 Q ON A PC YOU RUN. YOU DO SOMETHING TO IT
9 AND THAT RAW DATA IS CHANGED INTO A READING?
10 A UH-HUH.
11 Q IS THAT YES?
12 A YES.
13 Q SHE CAN'T TAKE DOWN --
14 A I'M SORRY.
15 Q THAT'S ALL RIGHT. SO THE ONLY HUMAN INPUT
16 IN ALL THIS IS JUST BASICALLY YOU TAKING THE CARD OUT
17 OF THE BADGE AND PUTTING IT INTO THE MACHINE; IS THAT
18 CORRECT?
19 A YES, SIR.
20 Q AND THEN SOMEBODY -- YOU DO SOMETHING ON
21 THE PC AND THE DOSAGE FIGURE COMES UP?
22 A YES.
23 Q NOW, DOES THAT DOSAGE FIGURE GET REVIEWED
24 BY ANYONE BEFORE IT IS ASSIGNED TO A PARTICULAR

1 EMPLOYEE?

2 A IT DEPENDS. IF THEY SEE SOMETHING WRONG

3 WITH THE READ, THEY HAVE A SUSPICION WITH A CURVE,

4 YES, IT GETS REVIEWED. IF THERE'S NOTHING WRONG WITH

5 THE CURVE, NO, THEY DON'T REVIEW.

6 Q IS EVERY READ INSPECTED TO SEE IF IT IS

7 OKAY?

8 A WE PUT -- THERE'S A GLOW CURVE ANALYSIS

9 WHICH AVERAGES THE GLOW CURVE TO SEE IF IT'S IN THE

10 RIGHT POSITION. IF IT SAYS IT'S OKAY -- WE SEE, IT

11 INDICATES, IT PUNCHES OUT THE ONES WE LOOK AT.

12 Q IS THIS GLOW CURVE ON THE SAME MACHINE THAT

13 DOES THE READINGS?

14 A IT'S ON A PC SEPARATE, BUT YES.

15 Q SO IS THE BADGE TAKEN TO A DIFFERENT

16 MACHINE?

17 A NO.

18 Q IT'S JUST DONE IN THE SAME MACHINE BUT

19 THROUGH A DIFFERENT PC?

20 A RIGHT.

21 Q SO ON ONE PC YOU GET THE DOSAGE READING AND

22 ON ANOTHER PC THE GLOW CURVE INDICATOR WILL SAY

23 SOMETHING?

24 A YES.

1 Q AND IF THE GLOW CURVE HAS CERTAIN

2 PARAMETERS AND IT IS OUTSIDE THE PARAMETERS, SOMEONE

3 REVIEWS IT?

4 A YES.

5 Q WHO TYPICALLY IN THE LAST FIVE YEARS OR SO

6 HAS BEEN THE PERSON TO REVIEW THE GLOW CURVE

7 INDICATOR?

8 A M [REDACTED] AND M [REDACTED]

9 Q IN YOUR -- OVER THE LAST -- AND YOU HAVE

10 BEEN DOING THIS -- STRIKE THAT.

11 I'LL START AGAIN. YOU HAVE BEEN DOING THE

12 READING OF THE CARDS FOR THE LAST 14 YEARS, SOMETHING

13 LIKE THAT?

14 A YES.

15 Q IN YOUR 14 YEARS OF DOING THIS, HAS THERE

16 BEEN INSTANCES WHERE THE DOSAGE READING THAT CAME UP

17 ON THE PC WAS EVER CHANGED?

18 A YES.

19 Q UNDER WHAT CIRCUMSTANCES NORMALLY IS THAT

20 FIGURE CHANGED?

21 A SOMETIMES WHEN THE MACHINE WILL

22 MALFUNCTION, WE'LL CHANGE A DOSE. IF THE GLOW CURVE

23 DOESN'T LOOK RIGHT AND THEY REVIEW THE GLOW CURVE AND

24 STUFF, IF THE DOSE IS NOT CORRECT, THEY WILL CHANGE

1 IT.

2 Q HOW ARE THESE -- STRIKE THAT.

3 ON THE COMPUTER WHEN IT SHOWS THE DOSAGE

4 FOR A PARTICULAR CARD, IS THAT AUTOMATICALLY PUT INTO

5 THE EMPLOYEE FILE THEN BY COMPUTER OR --

6 A NO.

7 Q OKAY. HOW DOES THAT GET INTO AN EMPLOYEE

8 FILE, SO TO SPEAK?

9 A UP UNTIL WE STARTED ON THE NEW SYSTEM,

10 WHICH WAS LIKE TWO YEARS AGO, WE MADE A DATA TAPE,

11 MAG TAPE, MAGNETIC TAPE, AND WE SENT IT TO THE 112

12 BUILDING AND THEY MERGE IT INTO THE PEOPLE'S RECORDS.

13 TWO YEARS AGO WE STARTED ON THE NEW ONE AND WE ARE

14 RESTARTING NOW. IT'S ALL THROUGH THE COMPUTER RIGHT

15 NOW.

16 Q BY MANIPULATING THE COMPUTER, I GUESS, IT

17 GETS IT IN THE EMPLOYEE FILE NOW?

18 A YES.

19 Q IN THE OLD SYSTEM WHERE THE MAG TAPES HAD

20 TO BE DONE, HOW OFTEN WAS THAT DONE?

21 A IT WAS DONE USUALLY ONCE A MONTH TO TAKE

22 OVER THE TEMPORARY READS AND IT WAS DONE EVERY QUARTER

23 WHEN I FIGURED A READ.

24 Q I HAVE HEARD SOME TERMINOLOGY CALLED A

1 BUCKET DOSE. HAVE YOU EVER HEARD THAT TERMINOLOGY

2 BEFORE?

3 A YES.

4 Q TO YOUR UNDERSTANDING, WHAT IS A BUCKET

5 DOSE?

6 A A BUCKET DOSE IS WHERE EVERYTHING GOES THAT

7 THEY CAN'T GET ASSIGNED TO ANYBODY.

8 Q SO THERE WOULD BE CARDS COME IN THAT FOR

9 ONE REASON OR ANOTHER WOULDN'T BE ASSIGNED TO AN

10 EMPLOYEE OR SOMETHING LIKE THAT?

11 A YES, SIR.

12 Q WOULD THAT BE LIKE VISITORS OR THINGS LIKE

13 THAT OR UNKNOWN BADGES?

14 A WELL, CAN YOU --

15 Q SURE. LET ME REPHRASE THE QUESTION.

16 A CAN YOU REPHRASE THAT?

17 Q SURE. TO YOUR UNDERSTANDING, HOW -- WHAT

18 ARE SOME OF THE CIRCUMSTANCES WHICH WOULD GIVE RISE TO

19 A BUCKET DOSE?

20 A WHEN A BADGE IS LIKE UNASSIGNED, DIDN'T GET

21 ASSIGNED TO A PERSON, THAT DOSE GOES IN THAT. IF A

22 BAR CODE CAN'T BE READ, CAN'T BE TRACED BACK, THAT

23 DOSE GETS DUMPED IN THERE JUST STUFF LIKE THAT.

24 Q WHEN YOU SAY, GETS DUMPED IN THERE, INTO A

1 BUCKET OR CONTAINER?
 2 A INTO LIKE A FILE, CONTAINER, FILE
 3 Q AND WHAT'S DONE WITH THOSE BADGES OR --
 4 A I HAVE NO IDEA.
 5 Q HAS THAT BEEN THE PRACTICE FOR -- EVER
 6 SINCE YOU HAVE BEEN THERE?
 7 A UP UNTIL THE NEW SYSTEM, YES.
 8 Q THE NEW SYSTEM DOESN'T, YOU DON'T HAVE
 9 THOSE WITH THE NEW SYSTEM?
 10 A I DON'T KNOW.
 11 Q OKAY. WHEN IN THE PROCESS WOULD SOMETHING
 12 BE PUT INTO A CONTAINER OR BUCKET, AFTER IT WAS READ?
 13 A YES, SIR.
 14 Q SO SOMETHING WOULD COME ON THE PC SHOWING A
 15 DOSAGE, BUT FOR SOME REASON IT'S NOT PUT INTO ANY
 16 EMPLOYEE FILE, BUT IT'S PUT INTO THE BUCKET DOSE OR
 17 CONTAINER?
 18 A YES, SIR.
 19 Q ONCE IT'S UP ON THE COMPUTER, IS IT PUT
 20 INTO A MAG TAPE AND KEPT ANYWHERE OR --
 21 A IT'S BACKED UP ON TAPE AND IT'S A MAGNETIC
 22 TAPE AND THEY ARE STORED THERE IN THE LAB NOW.
 23 Q OKAY. IN REVIEWING THOSE DOSAGE READINGS,
 24 WHO WOULD HAVE THE AUTHORITY DURING THE 1990'S, JUST

1 LIMIT IT TO 1990'S, WHO WOULD HAVE THE AUTHORITY TO
 2 DECIDE TO MAKE A CHANGE ON A DOSAGE READING?
 3 A ANYBODY ABOVE ME.
 4 Q OKAY. ANYBODY ABOVE. YOU WOULDN'T HAVE
 5 THE AUTHORITY ON YOUR OWN?
 6 A NO.
 7 Q SO ANYONE ABOVE YOU BEING ANYONE IN THE
 8 HEALTH PHYSICS LAB ABOVE YOU?
 9 A YES.
 10 Q OKAY. AND THROUGH THE 1990'S, LIMIT IT TO
 11 THE 1990'S, HOW MANY DIFFERENT PEOPLE DO YOU RECALL
 12 GIVING YOU AN INSTRUCTION TO MAKE CHANGES IN DOSAGE
 13 READINGS?
 14 A ONE.
 15 Q ONE. THAT WOULD HAVE BEEN YOUR IMMEDIATE
 16 SUPERVISOR?
 17 A M [REDACTED]
 18 Q OKAY. NOW, HOW IS A -- HOW IS THAT CHANGE
 19 MADE? I MEAN HOW DID THEY GO ABOUT --
 20 A WE HAD A TLD CORRECTION SHEET THAT WAS FOR
 21 THE 112 BUILDING. AND WE PUT ON THERE THE CHANGE WE
 22 WANTED TO HAPPEN. AND IT WAS SUBMITTED TO THE 112
 23 BUILDING. THEY DID THE JOB AND THE PAPER CAME BACK TO
 24 US.

1 Q NOW, THIS TLD CORRECTION SHEET, WAS THAT IN
 2 THE FORM OF AN ACTUAL PIECE OF PAPER?
 3 A YES, SIR.
 4 Q AND WOULD THAT HAVE A NUMBER OF CHANGES OR
 5 WOULD EACH CHANGE BE ON A SEPARATE SHEET?
 6 A IT DEPENDED. SOMETIMES YOU WOULD HAVE 20
 7 CHANGES. SOMETIMES YOU WOULD HAVE ONE.
 8 Q THIS -- WAS THIS A PREPRINTED FORM THAT YOU
 9 HAD IN THE HEALTH PHYSICS LAB?
 10 A YES, SIR.
 11 Q WOULD IT HAVE TO BE SIGNED BY ANYONE IN
 12 ORDER FOR IT TO GO THROUGH?
 13 A IT WOULDN'T.
 14 Q SO NORMALLY -- WOULD IT BE ACCURATE, WHAT
 15 NORMALLY WOULD HAPPEN WAS M [REDACTED] WOULD COME TO YOU
 16 WITH THE FORM ALREADY FILLED OUT?
 17 A NO.
 18 Q HOW WOULD THAT NORMALLY OCCUR?
 19 A HE WOULD REVIEW THE PERSON'S DOSE AND IF IT
 20 NEEDED TO BE CHANGED, THEN IT WOULD COME BACK TO ME
 21 WITH A YELLOW STICKY ON IT, SO MUCH SHALLOW, SO MUCH
 22 DEEP.
 23 Q AND WOULD THAT BE YOUR INDICATION TO FILL
 24 OUT THE TLD CORRECTION SHEET?

1 A YES, SIR.
 2 Q AND WOULD YOU FILL THAT OUT AND THEN TAKE
 3 IT OVER TO THE 112 BUILDING?
 4 A YES, SIR.
 5 Q AND THEN PRESUMABLY THEY WOULD MAKE THE
 6 CHANGES; IS THAT CORRECT?
 7 A YES.
 8 Q WOULD YOU GET THE CORRECTION SHEET BACK?
 9 A YES, SIR.
 10 Q WHAT WOULD HAPPEN TO THOSE CORRECTION
 11 SHEETS AFTER YOU GOT THEM BACK?
 12 A THEY WERE TO BE FILED.
 13 Q WERE THEY? IN THE NORMAL ACTUAL PRACTICE
 14 OF YOUR EMPLOYMENT, WERE THEY ACTUALLY FILED?
 15 A WHEN I DID THEM, YES, SIR.
 16 Q WHOSE RESPONSIBILITY WOULD IT BE FOR THOSE
 17 TO BE FILED?
 18 A THE PERSON SENDING THEM OVER.
 19 Q OKAY. DID OTHER PEOPLE SEND OVER
 20 CORRECTION SHEETS BESIDES YOURSELF?
 21 A YEAH.
 22 Q WHO ELSE?
 23 A C [REDACTED] K [REDACTED] --
 24 Q I'M LIMITING IT TO THE 1990'S

1 A ██████ K ██████ WOULD. I ██████ C ██████ I DON'T
 2 KNOW IF ██████ WOULD HAVE OR NOT, ██████ C ██████
 3 Q OKAY. NOW, WHEN YOU SAID THE ONES THAT
 4 CAME BACK YOU FILED, WHERE DID YOU FILE THOSE
 5 DOCUMENTS?
 6 A WE HAVE COMPUTER FOLDERS THAT WE PUT WITH
 7 THE PRINTOUTS THAT CAME BACK FROM 112 THEN, TO BE
 8 STAPLED AND FILED.
 9 Q HOW LONG WERE THOSE RECORDS KEPT TYPICALLY?
 10 A FOREVER.
 11 Q FOREVER. DID YOU EVER CHECK ON ANY OF
 12 THOSE CORRECTIONS TO SEE THAT THE CHANGES WERE
 13 ACTUALLY MADE THAT WERE ORDERED? WAS THERE ANY TYPE
 14 OF FOLLOW UP LIKE THAT?
 15 A YES.
 16 Q IN YOUR EXPERIENCE WERE THE CHANGES MADE
 17 THAT WERE ORDERED ON THE TLD CORRECTION FORMS?
 18 A YES.
 19 Q THERE WOULD, HOWEVER, FROM YOUR - STRIKE
 20 THAT.
 21 THE PAPERWORK THAT IS BEING KEPT WOULD NOT
 22 INCLUDE THE NAME OF THE PERSON WHO INITIATED THE
 23 CHANGES THAT CAUSED THE TLD CORRECTION FORM TO BE
 24 FILLED OUT, WOULD IT?

1 A NO.
 2 Q ON THE TLD CORRECTION FORM WOULD IT HAVE
 3 YOUR NAME?
 4 A MY INITIALS.
 5 Q OR WHOEVER ELSE FILLED IT OUT; CORRECT?
 6 A YES, SIR.
 7 Q BUT THE PEOPLE WHO FILLED THEM OUT, AS YOU
 8 INDICATED, AREN'T THE PEOPLE THAT ACTUALLY AUTHORIZED
 9 THE CHANGE?
 10 A NO.
 11 Q AND THE PEOPLE WHO AUTHORIZED THE CHANGES,
 12 THEIR NAMES WOULD APPEAR NOWHERE IN THE PAPERWORK.
 13 CORRECT?
 14 A RIGHT.
 15 Q NOW, WHEN THE CHANGES ARE ACTUALLY MADE
 16 ACCORDING TO THE CHANGES THAT ARE INDICATED ON THE TLD
 17 CORRECTION FORMS, DID THE PEOPLE WHO INPUTED THOSE
 18 CHANGES - STRIKE THAT. THAT'S A BAD QUESTION.
 19 TO MAKE A CHANGE IN A PERSON'S DOSAGE, WAS
 20 THERE A CERTAIN TYPE OF CODE OR ACCESS CODE REQUIRED
 21 TO GET INTO THAT SYSTEM TO MAKE THOSE CHANGES, IF YOU
 22 KNOW?
 23 A I WOULD IMAGINE. I DON'T KNOW.
 24 Q I GUESS MY QUESTION IS, COULD JUST - COULD

1 ANY EMPLOYEE WALK INTO THERE AND MAKE CORRECTIONS ON
 2 THAT?
 3 A NO. NO.
 4 Q OKAY. I ASSUME - LET ME ASK YOU THIS.
 5 DURING THE 1990'S, ON A DAILY, WEEKLY, MONTHLY,
 6 QUARTERLY OR YEARLY BASIS, HOW MANY CHANGES WOULD YOU
 7 SAY - HOW MANY CHANGES WOULD YOU SAY YOU MADE OR YOU
 8 FILLED OUT FORMS FOR?
 9 A QUITE A FEW. QUITE A FEW. SOMETIMES FIVE
 10 PAGES. THERE'S LIKE 25 OR 30 ENTRIES.
 11 Q THAT WOULD BE LIKE A 100, 150?
 12 A YEAH.
 13 Q NOW, THAT TYPE, WHAT WOULD YOU SAY THAT
 14 WOULD HAPPEN, ONCE A YEAR, ONCE A QUARTER?
 15 A ONCE A QUARTER.
 16 Q ONCE A QUARTER. THOSE - BETWEEN THOSE
 17 QUARTERLY READS, WOULD THERE BE OTHER INSTANCES WHERE
 18 YOU MIGHT INITIATE CHANGES OR CORRECTIONS?
 19 A YES.
 20 Q OKAY. AND HOW MANY WOULD THAT - THAT
 21 WOULD JUST BE LIKE ONE OCCASIONALLY?
 22 A ONE, SOMETIMES THREE.
 23 Q SO THE LARGEST AMOUNT OF CHANGES WOULD BE
 24 AT THE END OF EACH QUARTER?

1 A YES, SIR.
 2 Q AND WHEN THE BADGES WERE BEING READ ON A
 3 REGULAR BASIS?
 4 A YES, SIR.
 5 Q SO IF THERE WAS 100 TO 150 EVERY QUARTER,
 6 THAT WOULD BE 400 TO 600 A YEAR IF THAT WAS CONSISTENT
 7 THROUGHOUT THE YEAR?
 8 A YES, SIR.
 9 Q ON THOSE TLD CORRECTION FORMS WAS THE
 10 EMPLOYEE'S NAME PUT ON THOSE FORMS?
 11 A NO.
 12 Q WHAT WAS PUT ON THOSE FORMS?
 13 A THEIR BADGE NUMBER, EMPLOYEE NUMBER.
 14 Q SO WAS THIS JUST A SINGLE SHEET OF PAPER,
 15 THE TLD CORRECTION FORM?
 16 A YES.
 17 Q COULD YOU SORT OF DESCRIBE WHAT WAS ON IT?
 18 A IT JUST HAD LIKE A PLACE TO ENTER THE DATE,
 19 THE BADGE NUMBER. LET'S SEE, WHAT THE DOSE WAS, THE
 20 SHALLOW, DEEP DOSE, AREA FOR A CODE. I'M PULLING THIS
 21 FROM MEMORY. I HAVEN'T USED THEM FOR A LONG TIME. I
 22 THINK THAT'S IT.
 23 Q OKAY. WHAT WOULD THE CODE SIGNIFY?
 24 A THE CODE SIGNIFIES WHETHER IT'S A LOST

1 BADGE, WHETHER THE BADGE HAS BEEN, THE DOSE HAS BEEN
 2 CALCULATED ON IT, FOR SOME REASON THE MACHINE WOULDN'T
 3 CALCULATE IT. WHETHER IT IS AN ESTIMATE OR A SHALLOW
 4 OR DEEP FROM A LOST BADGE, DIFFERENT THINGS LIKE THAT.
 5 Q IN - EXCLUDING WHAT MAYBE HAPPENED IN ██████
 6 ██████S - IN ALL THE YEARS THAT YOU HAVE BEEN
 7 WORKING THERE - STRIKE THAT
 8 IT'S MY UNDERSTANDING THAT THERE WAS A
 9 CHANGE ORDERED ON ONE OF ██████ W ██████S READINGS
 10 SOMETIME IN THE '90S. DO YOU HAVE ANY RECOLLECTION
 11 OF THAT?
 12 A YES, SIR, I DO.
 13 Q OKAY. COULD YOU TELL ME WHAT YOU REMEMBER
 14 ABOUT THAT CHANGE, THE CIRCUMSTANCES SURROUNDING IT?
 15 A YES. I WAS WORKING IN THE TLD LAB
 16 DOWNSTAIRS, THE OLD 9000 C, AND M ██████ WALKS IN -
 17 ██████ M ██████ WALKS IN AND HE SORT OF LEANED OVER TO ME
 18 AND SAID, I NEED YOUR HELP HERE. AND I SAID, WHAT,
 19 AND HE SAID, I NEED THESE CHANGES MADE. AND I SAID,
 20 WHY? WHAT DID I DO WRONG? YOU KNOW, AND HE SAID, NO,
 21 NOTHING IS WRONG. IT'S A COURT CASE. AND I SAID, A
 22 COURT CASE? AND HE SAID, YES. AND SO THAT'S WHEN HE
 23 WENT INTO MY OFFICE AND HE SHOWED ME WHAT HE WANTED
 24 CHANGED AND I CHANGED IT.

1 Q NOW, PRIOR TO THAT TIME IN THE YEARS YOU
 2 HAVE BEEN WORKING THERE, HAD ANYONE EVER COME TO YOU
 3 AND ASKED YOU TO CHANGE SOMETHING FOR A COURT CASE?
 4 A NO
 5 Q SO THIS WAS HIGHLY UNUSUAL?
 6 A YES, IT WAS.
 7 Q THE MANNER IN WHICH HE ASKED YOU, THAT YOU
 8 JUST DESCRIBED THERE, WAS THAT DIFFERENT? I MEAN
 9 GOING INTO YOUR OFFICE, WAS THAT DIFFERENT OR IS THAT
 10 THE TYPICAL WAY?
 11 A NO, IT WAS DIFFERENT. USUALLY IT CAME DOWN
 12 ON A YELLOW STICKY NOTE ATTACHED TO THEIR PRIOR DOSE.
 13 YOU KNOW, THE SLIP THAT WAS HE WAS INSPECTING OR -
 14 Q SO HE ASKED TO YOU MAKE THIS CHANGE DID
 15 YOU THEN FILL OUT A TLD CORRECTION FORM?
 16 A YES, I DID.
 17 Q DID YOU TAKE IT OVER TO THE 112 BUILDING?
 18 A YES, I DID.
 19 Q AND DID YOU EVENTUALLY RECEIVE THAT TLD
 20 CORRECTION SHEET BACK?
 21 A YES.
 22 Q DO YOU RECALL IF THAT WAS FILED?
 23 A IT WAS FILED, YES
 24 Q OKAY. AT SOME TIME AFTER THAT DID YOU EVER

1 GO BACK IN - STRIKE THAT.
 2 WHAT WAS THE CHANGE FROM? WHAT WAS THE
 3 CHANGE TO?
 4 A THE CHANGE WAS FROM 26 SHALLOW, 26 DEEP TO
 5 0 SHALLOW, 0 DEEP.
 6 Q DID YOU EVER GO BACK INTO THE SYSTEM AT
 7 SOME LATER TIME TO INSPECT OR TO CHECK ON WHETHER THAT
 8 CHANGE HAD BEEN MADE?
 9 A YES, I DID.
 10 Q AND HAD THE CHANGE BEEN MADE?
 11 A YES, IT HAD.
 12 Q DID YOU EVER THEN GO BACK INTO THE SYSTEM
 13 YET A TIME AFTER THAT?
 14 A YES, I DID.
 15 Q AND DID YOU INSPECT TO SEE WHETHER THE
 16 CHANGE REMAINED?
 17 A YES, I DID.
 18 Q AND HAD THE CHANGE REMAINED AT 0?
 19 A NO.
 20 Q WHAT WAS IT CHANGED TO AT THAT TIME?
 21 A BACK TO 26 SHALLOW AND 26 DEEP
 22 Q DO YOU KNOW IF ANOTHER TLD CORRECTION FORM
 23 WAS FILLED OUT TO CHANGE IT BACK FROM 0 TO 26?
 24 A NO.

1 Q NO, YOU DON'T KNOW?
 2 A I DID NOT RECEIVE ANYTHING TO CHANGE THE
 3 DOSE.
 4 Q OKAY. WHAT IS A DEEP AND SHALLOW DOSE, TO
 5 YOUR UNDERSTANDING? I'M NOT ASKING YOU FOR A
 6 SCIENTIFIC --
 7 A SHALLOW DOSE IS ALPHA. DEEP DOSE, BETA
 8 GAMMA.
 9 Q DID MR. S ██████ INDICATE TO YOU THAT HE
 10 HAD -- THAT HE HAD DISCUSSED THIS CHANGE WITH ANYONE
 11 ELSE?
 12 A NO.
 13 Q OKAY. DID YOU SUBSEQUENTLY HEAR WHETHER HE
 14 HAD DISCUSSED THE CHANGE WITH ANYONE ELSE?
 15 A I DID NOT HEAR, BUT I SAW A PIECE OF PAPER.
 16 Q WHAT WAS ON THIS PIECE OF --
 17 A C ██████ M ██████ AND C ██████ C ██████.
 18 Q WHAT ELSE WAS ON THE PAPER? WHY DID THIS
 19 PAPER DRAW YOUR ATTENTION?
 20 A BECAUSE I WAS TOLD IT WAS A COURT CASE.
 21 Q AND YOU SAW THESE TWO GENTLEMEN'S NAMES ON
 22 THE PIECE OF PAPER?
 23 A YES.
 24 Q WAS THERE ANYONE ELSE ON THE PIECE OF PAPER

1 THAT YOU CAN RECALL?

2 A NO.

3 Q AND THE INDIVIDUAL'S RECORDS THAT WERE

4 CHANGED WERE [REDACTED] W [REDACTED]'S; CORRECT?

5 A YES, SIR.

6 Q IN YOUR EXPERIENCE, WHO WOULD HAVE HAD

7 ACCESS TO CHANGE THE READING FROM 0 BACK TO 26?

8 A [REDACTED] I [REDACTED].

9 Q ANYBODY ELSE?

10 A NOT THAT I KNOW OF.

11 Q WOULD THERE BE - EXCEPT FOR MR. S [REDACTED] OR

12 ONE OF THE PEOPLE ABOVE YOU, WOULD ANYBODY ELSE HAVE

13 THE ABILITY TO GO INTO THAT SYSTEM AND MAKE THE

14 CHANGES?

15 A I DON'T THINK SO.

16 Q OKAY. IS THERE SUCH A THING IN YOUR

17 EXPERIENCE AS AN AVERAGE DOSE, I MEANT?

18 A YEAH. YES, SIR, THERE IS.

19 Q WHAT, IN YOUR OPINION, IS AN AVERAGE DOSE?

20 A ANYWHERE FROM 50 MILLIREMS DOWN.

21 Q WOULD IT BE FAIR TO SAY, IN THE HUNDREDS

22 AND THOUSANDS OF CHANGES YOU HAVE MADE, YOU CAN'T

23 RECALL ALL OF THEM?

24 A THAT'S TRUE.

1 Q THE CHANGES THAT YOU HAVE MADE, HAVE THEY

2 BEEN ABOVE AVERAGE DOSES, BELOW AVERAGE DOSES, BOTH

3 TYPES?

4 A BOTH TYPES.

5 Q ARE THE - STRIKE THAT.

6 HAVE YOU EVER SEEN ANY TYPE OF PAPERWORK OR

7 ANYTHING THAT WOULD INDICATE THE CHANGE BACK FROM 0

8 BACK TO 26, OTHER THAN VIEWING IT ON THE SCREEN?

9 A NO.

10 Q WHAT I'M TRYING TO GET AT HERE, I'M TRYING

11 TO SEE FOR THOSE TYPES OF CHANGES, THE ONLY PAPER

12 TRAIL THERE APPEARS THERE WOULD BE WOULD BE THE TLD

13 CORRECTION FORM AND THAT'S ONLY IF THAT WAS STAPLED

14 AND FILED PROPERLY; IS THAT CORRECT?

15 A YES, SIR.

16 Q AND THEN THOSE WOULD ONLY INDICATE THE

17 PERSON AT YOUR LEVEL THAT ACTUALLY FILLED IT OUT, NOT

18 THE PERSON THAT ORDERED IT; CORRECT?

19 A YES, SIR.

20 Q DO YOU KNOW OF INSTANCES, OTHER THAN THIS

21 PARTICULAR ONE HERE, WHERE READINGS HAVE BEEN CHANGED

22 WITHOUT A TLD CORRECTION FORM BEING INITIATED?

23 A YES, SIR.

24 Q DID THAT HAPPEN - IN YOUR EXPERIENCE DID

1 THAT HAPPEN MORE THAN ONCE OR TWICE A YEAR?

2 A THAT, I CAN'T ANSWER.

3 Q OKAY. YOU HAVE KNOWN OF IT HAPPENING, BUT

4 YOU DON'T KNOW HOW FREQUENTLY?

5 A RIGHT.

6 Q THE CIRCUMSTANCES UNDER WHICH DOSAGE

7 READINGS COULD BE CHANGED WITHOUT A TLD CORRECTION

8 FORM, IN HOW MANY INSTANCES THAT YOU CAN RECALL, HOW

9 DID THAT COME ABOUT? HOW COULD THAT COME ABOUT?

10 A THEY COULD CHANGE ANYTHING THEY WANTED TO.

11 Q ALL YOU NEED BASICALLY IS ACCESS TO THE

12 SYSTEM?

13 A YES, SIR.

14 Q IN ALL THE OTHER CHANGES YOU MADE,

15 EXCLUDING [REDACTED] W [REDACTED]'S, WERE YOU TYPICALLY - YOU

16 WEREN'T TYPICALLY - STRIKE THAT.

17 EXCLUDING [REDACTED]'S CHANGES, FROM WHAT YOU

18 SAID, YOU WEREN'T GIVEN THE REASON FOR MAKING THE

19 CHANGES. YOU JUST GOT A YELLOW STICKY THAT SAID MAKE A

20 CHANGE?

21 A YES, SIR.

22 Q SO THE PERSON ORDERING YOU TO DO -

23 WHATEVER REASON THAT PERSON HAD YOU DIDN'T QUESTION

24 THE AUTHORITY, YOU JUST MADE THE CHANGE?

1 A YES, SIR.

2 Q WOULD IT BE FAIR FOR ME TO SAY THAT YOU CAN

3 REMEMBER THIS CHANGE BECAUSE OF THE COMMENT BY

4 MR. S [REDACTED] THAT IT WAS FOR A COURT CASE?

5 A YES, SIR.

6 Q AND I ASSUME IF THAT COMMENT HADN'T BEEN

7 MADE TO PLACE IT IN YOUR MEMORY, THIS CHANGE WOULD

8 HAVE GONE LIKE THE HUNDREDS AND THOUSANDS OF OTHER

9 CHANGES YOU HAVE MADE.

10 A YES, SIR.

11 Q WAS [REDACTED] M [REDACTED] AROUND OR IN THE AREA WHEN

12 M [REDACTED] MADE THIS COMMENT TO YOU?

13 A YES, SIR, SHE WAS.

14 Q IN YOUR OPINION FROM YOUR OBSERVATIONS,

15 WOULD YOU CONSIDER THE DOSAGE RECORDS THERE IN THE

16 PAST, THE RECORDS THE PAST YEARS, WOULD YOU CONSIDER

17 THOSE RECORDS, READINGS, THE FIXED READING ON THE

18 DOSAGE RECORDS, TO BE SECURE AND ACCURATE?

19 MR. TAIT: OBJECTION.

20 BUT YOU CAN GO AHEAD AND ANSWER.

21 A NO. I SAID NO.

22 Q OKAY. IF THERE WERE READINGS THAT WERE

23 INACCURATE OR INCORRECT OR IN ERROR, IS THERE

24 ANYTHING, ANY WAY TO BE ABLE TO TELL THOSE INACCURATE

1 OR INCORRECT OR ERROR READINGS FROM THE READINGS THAT
 2 ARE ACCURATE AND CORRECT?
 3 A NO.
 4 MR. EDWARDS: I WOULD JUST LIKE ONE
 5 SECOND
 6 ---
 7 RECESS TAKEN.
 8 ---
 9 BY MR. EDWARDS:
 10 Q TO THE BEST OF YOUR KNOWLEDGE, IS THERE
 11 ANY - STRIKE THAT
 12 YOU INDICATED THAT YOU HAVE GIVEN ONE OR
 13 TWO STATEMENTS, I BELIEVE THAT'S WHAT YOU SAID
 14 EARLIER. WAS THAT PART OF AN INTERNAL INVESTIGATION
 15 CONDUCTED BY LOCKHEED MARTIN?
 16 A YES.
 17 Q HAVE - TO THE BEST YOUR KNOWLEDGE, HAS
 18 THERE BEEN ANY OTHER INVESTIGATIONS DONE BY ANYBODY
 19 ELSE ON THE CHANGES OF ██████'S RECORDS THAT YOU ARE
 20 AWARE OF?
 21 A YES.
 22 Q WHOM ARE YOU AWARE OF THAT HAS INVESTIGATED
 23 THIS?
 24 A MY LAWYER.

1 Q ANYONE OTHER THAN THAT?
 2 A NOT THAT I KNOW OF.
 3 Q OKAY. IS THAT INVESTIGATION, TO THE BEST
 4 OF YOUR KNOWLEDGE, THE INTERNAL ONE, IS THAT'S ONGOING
 5 OR HAS THAT BEEN CONCLUDED, TO THE BEST OUR YOUR
 6 KNOWLEDGE?
 7 A I WOULD - WAS TOLD CONCLUDED.
 8 MR. EDWARDS: I DON'T HAVE ANYTHING MORE.
 9 ---
 10 CROSS-EXAMINATION
 11 BY MR. TAIT:
 12 Q MS. ██████ AS I INDICATED, MY NAME IS BOB
 13 TAIT AND I REPRESENT LOCKHEED MARTIN IN CONNECTION
 14 WITH THIS CASE. DO I UNDERSTAND CORRECTLY THAT YOU
 15 HAVE BEEN EMPLOYED IN THE DOSIMETRY LAB FOR ABOUT 14
 16 YEARS?
 17 A YES, SIR.
 18 Q PRIOR TO YOUR EMPLOYMENT IN THAT CAPACITY,
 19 OR AT ANY TIME DURING YOUR EMPLOYMENT IN THAT
 20 CAPACITY, HAVE YOU HAD RADIATION PROTECTION TRAINING
 21 AT ANY TIME?
 22 A YES, I HAVE.
 23 Q WHAT HAS THAT TRAINING ENTAILED?
 24 A THE STUFF THAT YOU NEED TO STAY AWAY FROM

1 AND THE EQUIPMENT YOU HAVE TO WEAR TO PROTECT
 2 YOURSELF.
 3 Q IN CONNECTION WITH THAT TRAINING OR THE
 4 OTHER TRAINING THAT YOU HAVE HAD FOR YOUR JOB IN THE
 5 DOSIMETRY LAB, ARE THERE CERTAIN LEVELS OF EXPOSURE AT
 6 THE PLANT? AND I'VE HEARD THE TERM ACTION LEVELS WITH
 7 RESPECT TO RADIATION.
 8 A YES, THERE IS.
 9 Q WHAT ARE THOSE LEVELS?
 10 A ACL, IT DEPENDS. IF YOU ARE NOT AN
 11 EMPLOYEE, 100; IF YOU ARE, 500.
 12 Q WHEN YOU SAY 100 OR 500, IS THAT MILLIREM?
 13 A YEAH.
 14 Q SO AM I CORRECT THAT ANY EXPOSURE BELOW
 15 100, IF YOU ARE NOT AN EMPLOYEE, OR 500 IF YOU ARE AN
 16 EMPLOYEE, ARE CONSIDER TO BE INCIDENTAL AND DON'T
 17 REQUIRE ANY ACTION?
 18 A YES.
 19 Q NOW, IN TERMS OF THE JOB OF THE DOSIMETRY
 20 LAB, IF I UNDERSTAND IT CORRECTLY, EVERY EITHER
 21 EMPLOYEE OR VISITOR TO THE PLANT WHO HAS THE POTENTIAL
 22 TO RADIATION MUST WEAR A TLD. IS THAT RIGHT?
 23 A YES, SIR.
 24 Q AND THEN THOSE TLD'S ARE EITHER READ WHEN A

1 VISITOR LEAVES THE PLANT OR ON A QUARTERLY BASIS IF
 2 YOU ARE AN EMPLOYEE?
 3 A YES, SIR.
 4 Q SO IN MR. W ██████'S CASE THEY WOULD BE READ
 5 EVERY QUARTER?
 6 A YES.
 7 Q AND THE READING IS OESIGNED TO DETERMINE
 8 THE AMOUNT OF RADIATION THAT PARTICULAR EMPLOYEE HAS
 9 BEEN EXPOSED TO DURING THE PAST QUARTER, IS THAT
 10 RIGHT?
 11 A YES, SIR.
 12 Q DO YOU HAVE ANY IDEA AS TO HOW MANY BADGES
 13 YOU READ ON A QUARTERLY BASIS?
 14 A 1,000.
 15 Q SO DOES THAT INCLUDE JUST EMPLOYEES OR
 16 EMPLOYEES AND VISITORS?
 17 A NO, THAT'S EMPLOYEES.
 18 Q YOU WOULD ALSO READ THE BADGES OF THE
 19 VISITORS OR ANYBODY ELSE AT THE PLANT?
 20 A YES, SIR.
 21 Q AND APPROXIMATELY HOW MANY OF THOSE WOULD
 22 YOU SEE ON A QUARTERLY BASIS?
 23 A ARE WE TALKING ABOUT NOW OR THE '90'S?
 24 Q '90'S.

1 A WE READ 40 TEMPORARIES A DAY. THAT'S 1200
 2 BADGES A MONTH.
 3 Q SO THAT WOULD BE 3600 A QUARTER PLUS THE
 4 3000 EMPLOYEES FOR 6600 BADGES A QUARTER. SO WHEN YOU
 5 TOLD MR. EDWARDS THAT SOMETIMES YOU WOULD CHANGE 100
 6 TO 150 BADGES, THAT AMOUNT WAS OUT OF 6600 BADGES?
 7 A YES, SIR. UH-HUH.
 8 Q OKAY. NOW, YOU TOLD MR. EDWARDS THAT YOU
 9 HAVE GIVEN A STATEMENT ABOUT MR. W [REDACTED] OR THE
 10 CHANGES THAT YOU INITIATED - THE FORM, THE CHANGES IN
 11 MR. W [REDACTED]'S READINGS AND YOU HAVE GIVEN STATEMENTS
 12 TO D [REDACTED] B [REDACTED] AND F [REDACTED] W [REDACTED]?
 13 A YES, SIR.
 14 Q THAT WAS IN CONNECTION WITH AN
 15 INVESTIGATION THE FACILITY -
 16 A YES, SIR.
 17 Q WHO ELSE DID YOU DISCUSS THAT CHANGE WITH?
 18 A MY ATTORNEY.
 19 Q THAT WAS MR. ZINGARELLI?
 20 A YES.
 21 Q WHO ELSE?
 22 A I WAS TRYING TO THINK OF ANYBODY ELSE ON
 23 PLANT SITE THAT TALKED TO ME. I DON'T THINK I DID,
 24 D [REDACTED] B [REDACTED] AND F [REDACTED]

1 Q DID YOU DISCUSS IT WITH MR. W [REDACTED]?
 2 A NO. I KNOW [REDACTED] H [REDACTED], I WENT TO HER ONE
 3 TIME.
 4 Q YOU DID NOT DISCUSS IT WITH MR. W [REDACTED] N?
 5 A NO.
 6 Q HAVE YOU EVER DISCUSSED IT WITH
 7 MR. W [REDACTED]?
 8 A NO.
 9 Q HAVE YOU EVER DISCUSSED IT WITH C [REDACTED]
 10 K [REDACTED] Y?
 11 A YES.
 12 Q HAVE YOU DISCUSSED IT WITH ANYONE ELSE THAT
 13 YOU CAN THINK OF?
 14 A JUST C [REDACTED] X [REDACTED]
 15 Q AND THE PEOPLE THAT YOU TOLD US?
 16 A RIGHT.
 17 Q IN TERMS OF THE TIMING, THAT IS THE TIME
 18 WHEN MR. S [REDACTED] ASKED YOU TO CHANGE THE PARTICULAR
 19 BADGE READING, WAS THAT BEFORE OR AFTER YOU INITIATED
 20 YOUR LAWSUIT AGAINST WHAT WAS THEN MARTIN MARIETTA?
 21 A PROBABLY AFTER.
 22 Q WOULD IT HAVE BEEN DURING YOUR LAWSUIT?
 23 A YES. PROBABLY WAS DURING, YES.
 24 Q AND YOU INDICATED THAT YOUR ATTORNEY HAD

1 PERFORMED AN INVESTIGATION WITH RESPECT TO THIS
 2 CHANGE.
 3 A SOMEWHAT, I DON'T KNOW INTO WHAT DEPTHS HE
 4 WENT.
 5 Q DO YOU KNOW WHY HE PERFORMED THE
 6 INVESTIGATION?
 7 A YEAH, I ASKED HIM TO. HE WAS MY ATTORNEY.
 8 Q DO YOU RECALL WHY YOU ASKED HIM TO, I MEAN?
 9 A YES. BECAUSE THEY - I HAD WENT TO MY
 10 ATTORNEY TO SUE LOCKHEED MARTIN OR WHATEVER IT WAS AT
 11 THE TIME, WHICH WE KNOW IT CHANGED A LOT. THEY
 12 CHANGED AROUND ON ME. AND THEY - I HADN'T BEEN
 13 PROMOTED THROUGH MY EMPLOYMENT AND I WANTED - I SAID
 14 IF THEY CAN CHANGE A DOSE LIKE THIS, THEY CAN CHANGE
 15 MY RECORDS.
 16 Q WHAT WAS YOUR BASIS OF YOUR LAWSUIT
 17 AGAINST -
 18 A DISCRIMINATION. I WAS NOT PROMOTED.
 19 Q AM I CORRECT THAT THAT SUIT WAS SETTLED?
 20 A YES.
 21 Q WHEN WAS THAT SETTLED?
 22 A I DON'T REMEMBER. I CAN'T REMEMBER THE
 23 DATE REALLY.
 24 Q BEFORE THIS INSTANCE WHEN MR. S [REDACTED] ASKED

1 YOU TO CHANGE MR. W [REDACTED]'S DOSIMETRY READING, WERE
 2 YOU ACQUAINTED WITH MR. W [REDACTED]?
 3 A I SEEN HIM AROUND PLANT SITE, HE WAS A
 4 GUARD. WE WORKED IN DOSIMETRY WITH HIM.
 5 Q YOU ONLY SAW HIM ON PLANT SITE? YOU
 6 WEREN'T SOCIAL FRIENDS WITH HIM?
 7 A NO. OH, NO.
 8 Q NOW, YOU INDICATED, I BELIEVE, THAT THE TLD
 9 CORRECTION SHEET, WHEN IT'S FILLED OUT, DID NOT
 10 INCLUDE THE NAME OF THE EMPLOYEE, IT SIMPLY INCLUDED
 11 THE BADGE NUMBER AND THE PARTICULAR CODE INVOLVED.
 12 A AS WELL AS I CAN REMEMBER.
 13 Q RIGHT. HOW DID YOU THEN DETERMINE THAT THE
 14 PARTICULAR BADGE NUMBER THAT MR. S [REDACTED] HAD ASKED YOU
 15 TO CHANGE THE DOSAGE FOR BELONGED TO MR. W [REDACTED]?
 16 A I LOOKED IT UP ON THE PRINTOUT.
 17 Q BEFORE OR AFTER YOU INITIATED THE CHANGE?
 18 A BEFORE.
 19 Q AND WHY DID YOU DO THAT?
 20 A BECAUSE HE TOLD ME IT WAS A COURT CASE.
 21 Q IS THIS SOMETHING THAT YOU HAVE DONE OTHER
 22 TIMES WHEN YOU MADE CHANGES OR WAS THIS THE ONLY TIME?
 23 A NO, THAT WAS THE ONLY TIME.
 24 Q DO YOU REMEMBER APPROXIMATELY WHEN

1 MR. S [REDACTED] ASKED YOU TO MAKE THIS CHANGE?
2 A JULY OR AUGUST, MAYBE, '94, ALONG THERE.
3 Q DO YOU REMEMBER WHAT QUARTER THE BADGE
4 READING REPRESENTED?
5 A NO, I DON'T.
6 Q IF IT WAS IN JULY OR AUGUST OF 1994, IF I'M
7 CORRECT, YOU WOULD NOT HAVE HAD THE BADGE READINGS FOR
8 THE THIRD QUARTER OF '94.
9 A RIGHT.
10 Q SO IT WOULD HAVE TO HAVE BEEN FOR THE FIRST
11 OR SECOND QUARTER?
12 A OR FURTHER BACK.
13 Q AND IF I RECALL YOUR TESTIMONY CORRECTLY,
14 THE REQUEST WAS TO CHANGE THE READING FROM 26 SHALLOW,
15 26 DEEP TO 0 SHALLOW, 0 DEEP.
16 A YES.
17 Q IS 26 SHALLOW, 26 DEEP A READING THAT WOULD
18 REQUIRE ANY ACTION?
19 A NO.
20 Q IT'S CONSIDERED TO BE AN INCIDENTAL
21 READING?
22 A YES.
23 Q YOU TOLD MR. EDWARDS ABOUT A PIECE OF PAPER
24 THAT YOU SAW, I ASSUME THAT MR. S [REDACTED] HAD, THAT

1 INCLUDED MR. D [REDACTED]'S AND MR. M [REDACTED]'S NAMES ON IT.
2 A YES
3 Q WHY DID YOU CONNECT THAT WITH THE CHANGE IN
4 THE BADGE READING?
5 A BECAUSE IT WAS ON THE PAPER THAT HE BROUGHT
6 DOWN TO TELL ME THE CHANGE.
7 Q I DON'T UNDERSTAND. I THOUGHT YOU TOLD
8 MR. EDWARDS HE ORALLY TOLD YOU THE CHANGE.
9 A HE HAD A NOTE ON A PIECE OF PAPER OF THE
10 DATE HE WANTED CHANGED AND THIS CONTAINED M [REDACTED]'S
11 AND D [REDACTED]'S NAMES ON THE PIECE OF PAPER.
12 Q WAS THERE MORE THAN ONE CHANGE THAT HE
13 REQUESTED?
14 A YES, SIR, THERE WAS.
15 Q WHAT OTHER CHANGES?
16 A TWO MORE OF THE SAME READING.
17 Q TWO MORE OF THE SAME READING?
18 A YES. THERE WERE THREE IN ALL CHANGED.
19 Q AND DID YOU ASK OR INVESTIGATE AS TO WHOM
20 THOSE READINGS INVOLVED?
21 A THE SAME ONE, SAME BADGE NUMBER.
22 Q I'M SORRY. I THOUGHT YOU TESTIFIED YOU
23 ONLY CHANGED ONE READING
24 A NO, THERE WAS THREE IN ALL

1 Q THREE READINGS FOR MR. W [REDACTED]?
2 A YES.
3 Q FOR THREE DIFFERENT PERIODS?
4 A YES.
5 Q WHAT OTHER PERIODS OTHER THAN THIS 26
6 SHALLOW, 26 DEEP THAT YOU CHANGED?
7 A I CAN'T REMEMBER, BUT THERE WERE THREE
8 READINGS. I DON'T RECALL THE DATES.
9 Q DO YOU RECALL THE SPECIFICS OF THE
10 READINGS?
11 A YES.
12 Q ALL RIGHT. WHAT WERE THOSE?
13 A 26.
14 Q ALL 26 SHALLOW, 26 DEEP?
15 A ALL OF THEM.
16 Q CHANGED TO 0?
17 A UH-HUH.
18 Q HAVE YOU EVER SINCE THAT TIME HAD OCCASION
19 TO REVIEW MR. W [REDACTED]'S HISTORICAL DOSIMETRY RECORD?
20 A I WOULD HAVE NO CAUSE TO.
21 Q IF THAT WAS THE CASE, THEN HOW DID YOU
22 DETERMINE THAT THE CHANGE, IN FACT, HAD BEEN CHANGED
23 BACK?
24 A I HAVE TO AUDIT THE PAPER WHEN IT COMES

1 BACK TO SEE WHEN IT WAS CHANGED. I GOT SUSPICIOUS AND
2 I WENT BACK IN AND CHECKED AND THEY CHANGED IT BACK.
3 IT WAS ON THE PC. ANYBODY IN DOSIMETRY CAN DO --
4 ANYBODY IN PHYSICS CAN DO IT.
5 Q DID YOU JUST REVIEWS THOSE THREE PARTICULAR
6 CHANGES OR ONE CHANGE OR WHAT DO YOU REMEMBER?
7 A I VIEWED THE WHOLE FILE. I JUST GLANCED AT
8 THE WHOLE FILE BECAUSE IT'S ALL BROUGHT UP. YOU
9 CANNOT CALL FOR A SPECIFIC DATE. WHEN I REVIEW THEIR
10 HISTORY, IT PRINTS IT ALL OUT.
11 Q SO YOU REVIEWED MR. W [REDACTED]'S HISTORICAL
12 DOSIMETRY FILE?
13 A YES. I GLANCED AT IT. IT WAS UP ON THE
14 SCREEN.
15 Q AND YOU COULD TELL FROM THAT REVIEW THAT
16 THE 26 SHALLOW, 26 DEEP READING HAD BEEN REINSTITUTED
17 ON THAT FILE?
18 A YES, I COULD.
19 Q BUT AM I CORRECT THAT YOU RECALL -- DON'T
20 RECALL HERE TODAY FOR WHAT PERIOD THOSE READINGS --
21 A NO, I CAN'T PULL THE DATES UP IN MY MIND,
22 NO. NO.
23 Q OKAY. TO YOUR KNOWLEDGE, IS THIS THE ONLY
24 TIME THAT MR. S [REDACTED] ASKED YOU TO CHANGE A READING FOR

1 A COURT CASE?
 2 A YES, SIR.
 3 Q DID HE EXPLAIN TO YOU WHY HE WANTED YOU TO
 4 CHANGE THIS READING?
 5 A YES.
 6 Q WHAT DID HE SAY?
 7 A HE SAID IT WAS EASIER TO EXPLAIN 0 AND 0
 8 THAN 26 AND 26.
 9 Q DID YOU QUESTION HIM AT ALL ABOUT THAT?
 10 A NO. HE WAS MY SUPERVISOR.
 11 Q AND AM I CORRECT THAT YOUR SUSPICION THAT
 12 MR. [REDACTED] AND MR. M [REDACTED] WERE AWARE OF THE CHANGE IS
 13 BASED UPON THE FACT THAT THEIR NAMES WERE ON THIS
 14 PIECE OF PAPER?
 15 A YES.
 16 Q HAVE YOU EVER DISCUSSED THIS WITH EITHER
 17 MR. [REDACTED] OR MR. M [REDACTED]?
 18 A NO.
 19 Q DID YOU EVER SEE THIS PIECE OR PAPER AGAIN?
 20 A NO.
 21 MR. TAIT: I DON'T THINK I HAVE ANY MORE
 22 QUESTIONS. THANK YOU VERY MUCH.
 23 MR. EDWARDS: THANK YOU, MS. SMITH.
 24 ...

1 SIGNATURE NOT WAIVED.
 2 ---
 3 THEREUPON, AT 10:58 A.M.,
 4 ON TUESDAY, APRIL 22, 1997,
 5 THE DEPOSITION WAS CONCLUDED.
 6 ---
 7
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1
 2 [REDACTED]
 3
 4 I CERTIFY THAT THIS DEPOSITION TRANSCRIPT
 5 WAS SIGNED IN MY PRESENCE BY [REDACTED] ON THE
 6 ___ DAY OF _____, 1997.
 7 IN WITNESS WHEREOF, I HAVE HEREUNTO SET MY
 8 HAND AND AFFIXED MY SEAL OF OFFICE AT PIKETON, OHIO,
 9 ON THIS ___ DAY OF _____, 1997.
 10
 11 _____
 12 NOTARY PUBLIC
 13
 14 MY COMMISSION EXPIRES:
 15 ---
 16
 17
 18
 19
 20
 21
 22
 23
 24

1 CERTIFICATE
 2 STATE OF OHIO)
 3) SS:
 4 COUNTY OF FRANKLIN)
 5 I, [REDACTED] S [REDACTED], PROFESSIONAL
 6 REPORTER AND NOTARY PUBLIC IN AND FOR THE STATE OF
 7 OHIO, DO HEREBY CERTIFY THAT BEFORE THE TAKING OF HER
 8 DEPOSITION, THE SAID [REDACTED] WAS FIRST DULY
 9 SWORN BY ME TO TELL THE TRUTH, THE WHOLE TRUTH, AND
 10 NOTHING BUT THE TRUTH;
 11 THAT SAID DEPOSITION WAS TAKEN IN ALL
 12 RESPECTS PURSUANT TO THE STIPULATIONS OF COUNSEL
 13 HERETOFORE SET FORTH AND GIVEN AT THE SAID TIME AND
 14 PLACE BY THE SAID [REDACTED];
 15 THAT I AM NOT AN ATTORNEY FOR OR
 16 RELATIVE OF EITHER PARTY AND HAVE NO INTEREST
 17 WHATSOEVER IN THE EVENT OF THIS LITIGATION.
 18 IN WITNESS WHEREOF, I HAVE HEREUNTO SET
 19 MY HAND AND OFFICIAL SEAL OF OFFICE AT COLUMBUS, OHIO,
 20 THIS MAY 12TH, 1997.
 21 [REDACTED] S [REDACTED] NOTARY PUBLIC
 22 IN AND FOR THE STATE OF OHIO.
 23 MY COMMISSION EXPIRES: DECEMBER 14, 1999.
 24

-&-	4097 [1] 6:11	AGREED [1] 3:3	BELONGED [1] 40:15	30:1,11 31:14,17,19 32:9
& [1] 1:22	43123 [1] 2:13	AHEAD [1] 32:20	BELOW [2] 30:2 35:14	33:19 37:10,10 40:22
-.-	43206 [1] 1:23	AL [2] 1:6,10	BEST [4] 33:10,17 34:3	42:15 44:6
'90'S [3] 25:10 36:23,24	43215 [1] 2:17	ALONG [1] 41:2	34:5	CHECK [2] 21:11 27:7
'94 [2] 41:2,8	445-6300 [1] 1:24	ALPHA [1] 28:7	BETA [1] 28:7	CHECKED [1] 44:2
-0-	45661 [1] 2:19	ALWAYS [1] 7:13	BETWEEN [2] 3:4	CHIEF [1] 2:17
0 [11] 27:5,5,18,23 29:7	-5-	AMOUNT [4] 10:24	23:16	C [5] 20:23 21:1
30:7 41:15,15 43:16 45:7	5 [1] 4:4	23:23 36:8 37:6	BEYOND [1] 6:15	32:11 38:9,14
-1-	50 [1] 29:20	ANALYSIS [1] 13:8	BIRTH [1] 6:3	CIRCUMSTANCES
1 [2] 10:5,6	500 [3] 35:11,12,15	ANSWER [2] 31:2	B [1] 34:12	[4] 14:19 16:18 25:14
100 [7] 2:6 23:11 24:5	52 [1] 2:16	32:20	BOX [2] 2:19 6:10	31:6
35:11,12,15 37:5	53 [1] 6:2	APPEAR [1] 22:12	BREAK [1] 5:19	CITY [1] 2:13
10:02 [1] 2:7	-6-	APPEARANCES [1]	BRIEFLY [2] 5:11 6:14	CLEAR [1] 5:17
10:58 [1] 46:3	600 [1] 24:6	2:11	BROADWAY [1] 2:12	CLYDE [2] 28:17 29:8
112 [6] 15:11 18:21,22	614 [1] 1:24	APPEARING [2] 2:13	BROUGHT [2] 42:5	CODE [7] 16:22 22:20
20:3 21:7 26:17	628 [1] 2:19	2:19	44:8	22:20 24:20,23,24 40:11
1200 [1] 37:1	6600 [2] 37:4,6	APRIL [2] 1:16 46:4	BUCKET [7] 16:1,4,6	COLLEGE [1] 7:11
12TH [1] 48:19	6TH [1] 6:4	AREA [2] 24:20 32:11	16:19 17:1,12,16	COLUMBUS [3] 1:23
14 [4] 14:12,15 34:15	-7-	ASSIGN [1] 11:3	BUILDING [5] 15:12	2:17 48:18
48:22	759 [1] 6:10	ASSIGNED [5] 10:23	18:21,23 20:3 26:17	COMMENCING [1]
150 [3] 23:11 24:5 37:6	-8-	12:24 16:7,9,21	BUTLER [3] 8:15 37:12	2:7
1943 [1] 6:4	8800 [1] 11:4	ASSIGNS [1] 11:19	37:24	COMMENT [3] 32:3,6
1980 [2] 7:4,16	-9-	ASSOCIATE [1] 6:16	-C-	32:12
1990'S [6] 17:24 18:1	9000 [1] 25:16	ASSUME [3] 23:4 32:6	C [3] 25:16 48:1,1	COMMISSION [2]
18:10,11 20:24 23:5	915 [1] 1:23	41:24	C2-96-722 [1] 1:8	47:14 48:22
1994 [1] 41:6	-A-	ATTACHED [1] 26:12	CALCULATE [1] 25:3	COMPUTER [10] 6:17
1997 [5] 1:16 46:4 47:6,9	A.M [2] 2:7 46:3	ATTENTION [1] 28:19	CALCULATED [1]	12:1,6,7 15:3,5,14,16
48:19	ABILITY [1] 29:13	ATTORNEY [6] 5:12	25:2	17:19 21:6
1999 [1] 48:22	ABLE [1] 32:24	37:18 38:24 39:7,10 48:14	CANNOT [1] 44:9	CONCLUDED [3]
-2-	ABOVE [6] 18:3,4,7,8	AUDIT [1] 43:24	CAPACITY [2] 34:18	34:5,7 46:5
2 [2] 10:5,6	29:12 30:2	AUGUST [2] 41:2,6	34:20	CONDUCTED [1]
20 [1] 19:6	ACCESS [3] 22:20 29:7	AUGUSTY [4]	CARD [3] 10:15 12:16	33:15
22 [2] 1:16 46:4	31:11	17:24 18:1,5 31:24	15:4	CONNECT [1] 42:3
25 [1] 23:10	ACCORDING [1]	AUTHORIZED [2]	CARDS [5] 9:8 10:18	CONNECTION [5] 8:8
26 [20] 27:4,4,21,21,23	22:16	22:8,11	11:6 14:12 16:8	10:11 34:13 35:3 37:14
29:7 30:8 41:14,15,17,17	ACCURATE [3] 19:14	AUTOMATICALLY	CASE [11] 1:8 25:21,22	CONSIDER [3] 32:15
43:5,6,13,14,14 44:16,16	32:18 33:2	[1] 15:4	26:3 28:20 32:4 34:14	32:16 35:16
45:8,8	ACL [1] 35:10	AVERAGE [4] 29:17	36:4 40:20 43:21 45:1	CONSIDERED [1]
291-40-2719 [1] 6:6	ACQUAINTED [1]	29:19 30:2,2	CAUSED [1] 21:23	41:20
2ND [2] 2:6 7:4	40:2	AVERAGES [1] 13:9	CERTAIN [5] 10:23,24	CONSISTENT [1]
-3-	ACTION [3] 35:6,17	AWARE [3] 33:20,22	14:1 22:20 35:5	24:6
3,000 [1] 36:14	41:18	45:12	CERTIFIED [1] 5:4	CONTAINED [1]
30 [1] 23:10	ACTUAL [2] 19:2 20:13	AWAY [1] 34:24	CERTIFY [2] 47:4 48:6	42:10
3000 [1] 37:4	ADDRESS [2] 6:7,8	-B-	CHANGE [53] 10:2,3	CONTAINER [4] 17:1
34 [1] 4:5	ADMINISTRATION	BACKED [1] 17:21	11:2 14:22,24 18:2,18,21	17:2,12,17
3600 [1] 37:3	[1] 6:17	BAD [1] 22:18	19:5 22:9,19 25:9,14 26:3	CONTENTS [1] 4:1
-4-	AFFIXED [1] 47:8	BADGE [21] 10:14,16	26:14 27:2,3,4,8,10,16,18	CONVICTED [1] 7:23
40 [1] 37:1	AGAIN [2] 14:11 45:19	10:22,24 11:2,19 12:17	27:23 28:2,10,14 29:7	CORPORATION [1]
400 [1] 24:6	AGAINST [3] 5:13	13:15 16:20 24:13,19 25:1	30:7 31:10,20,24 32:3,7	1:10
4030 [1] 2:12	AGE [1] 6:1	25:1,4 38:19 40:11,14	37:5,17 38:18 39:2,14,14	CORRECT [14] 12:18
	AGO [2] 15:10,13	41:3,7 42:4,21	40:1,15,17 41:1,14 42:3,6	14:24 20:6 22:5,13 29:4
		BADGES [11] 11:7,9	42:8,12 43:22 44:6,24	30:14,18 33:2 35:14 39:19
		16:13 17:3 24:2 36:12,18	45:4,12	41:7 44:19 45:11
		37:2,4,6,6	CHANGED [20] 12:9	CORRECTION [19]
		BAR [1] 16:22	14:17,20 19:20 25:24,24	18:20 19:1,24 20:8,10,20
		BASED [1] 45:13	27:20 29:4 30:21 31:7	21:17,23 22:2,17 24:9,15
		BASIS [6] 23:6 24:3 36:1	39:11,12 42:10,18,23 43:6	26:15,20 27:22 30:13,22
		36:13,22 39:16	43:16,22 44:1,2	31:7 40:9
		BECOMING [1] 10:17	CHANGES [31] 18:12	CORRECTIONS [3]
		BEHALF [2] 2:13,19	19:4,7 20:6 21:12,16,23	21:12 23:1,18
			22:11,15,16,18,21 23:6,7	CORRECTLY [3]
			23:18,23 25:19 29:14,22	34:14 35:20 41:13
				COUNSEL [4] 2:9,18
				3:4 48:11

COUNTY [2] 2:6 48:3
COURT [8] 1:1 25:21
25:22 26:3 28:20 32:4
40:20 45:1
COURTHOUSE [1]
2:6
CROSS-EXAMINATION [5]
2:3 4:4,5 5:6 34:10
C [REDACTED] [1]
21:2
CURVE [10] 13:3,5,8,9
13:12,22 14:1,6,22,23

-D-

DAILY [1] 23:5
DATA [5] 10:18 11:17
12:3,9 15:10
DATE [5] 6:3 24:18
39:23 42:10 44:9
DATES [2] 43:8 44:21
DECEMBER [1] 48:22
DECIDE [1] 18:2
DEEP [14] 19:22 24:20
25:4 27:4,5,21 28:4,7
41:15,15,17 43:6,14 44:16
DEFENDANTS [2]
1:11 2:20

DEGREES [1] 6:16
DENISE [4] 2:4 3:6 48:4
48:21
DEPENDENT [1] 19:6
DEPOSED [1] 8:2
DEPOSITION [10]
1:14 2:2,8 3:5,9 5:15 46:5
47:4 48:7,10
DEPTHS [1] 39:3
DESCRIBE [1] 24:17
DESCRIBED [1] 26:8
DESIGNED [1] 36:7
DETERMINE [3] 36:7
40:13 43:22

DIFFERENT [9] 8:12
13:15,19 18:11 25:4 26:8
26:9,11 43:3
DISCRIMINATION
[1] 39:18
DISCUSS [3] 37:17 38:1
38:4
DISCUSSED [6] 28:10
28:14 38:6,9,12 45:16
DISTRICT [2] 1:1,2
DIVELY [2] 9:16,18
DIVISION [1] 1:3
DOCUMENTS [1]
21:5
DOESN'T [2] 14:23
17:8

D [REDACTED] [4] 28:17 29:8
45:12,17
D [REDACTED] S [2] 42:1,11
D [REDACTED] [3] 8:15 37:12,24
DONE [8] 13:18 15:20

15:20,21,22 17:3 33:18
40:21
DOSAGE [16] 8:8 11:22
12:21,23 13:21 14:16 15:3
17:15,23 18:2,12 22:19
31:6 32:15,18 40:15
DOSE [23] 11:19,20
14:22,24 16:1,5,6,19,21
16:23 17:16 19:19 24:19
24:20 25:1 26:12 28:3,4,7
28:7 29:17,19 39:14
DOSES [3] 8:23 30:2,2
DOSIMETER [1]
10:12
DOSIMETRY [12]
6:23 10:1,6,8 34:15 35:5
35:19 40:1,4 43:19 44:3
44:12

DOWN [4] 12:13 26:11
29:20 42:6
DOWNSTAIRS [1]
25:16
DRAW [1] 28:19
DULY [2] 5:3 48:7
DUMPED [2] 16:23,24
DURING [7] 5:15 17:24
23:5 34:19 36:9 38:22,23

-E-

E [4] 1:22 2:15 48:1,1
EASIER [1] 45:7
EAST [2] 2:6,16
EASTERN [1] 1:3
EDUCATION [1] 6:15
EDWARDS [12] 2:12
4:4 5:7,10 33:4,9 34:8
37:5,8 41:23 42:8 45:23
EITHER [4] 35:20,24
45:16 48:15
EMPLOYED [7] 6:20
6:22 7:2,5,8,12 34:15

EMPLOYEE [15] 13:1
15:5,7,17 16:10 17:16
23:1 24:13 35:11,15,16
35:21 36:2,8 40:10
EMPLOYEE'S [1]
24:10
EMPLOYEES [5] 8:16
36:15,16,17 37:4
EMPLOYMENT [4]
20:14 34:18,19 39:13
END [1] 23:24
ENTAILED [1] 34:23
ENTER [1] 24:18
ENTRIES [1] 23:10
EQUIPMENT [1] 35:1
ERROR [2] 32:23 33:1
ESQ [2] 2:12,15
ESTIMATE [1] 25:3
ET [2] 1:6,10
EVENT [1] 48:16
EVENTUALLY [1]

26:19
EXAMINER [1] 4:3
EXCEPT [1] 29:11
EXCLUDING [3] 25:5
31:15,17
EXPERIENCE [4]
21:16 29:6,17 30:24
EXPIRES [2] 47:14
48:22
EXPLAIN [2] 45:3,7
EXPOSED [1] 36:9
EXPOSURE [2] 35:5
35:14
EXPRESSLY [1] 3:11

-F-

F [1] 48:1
FACILITY [1] 37:15
FACT [2] 43:22 45:13
FACTS [1] 5:24
FAIR [2] 29:21 32:2
FELONY [1] 7:23
FEW [4] 5:14,24 23:9,9
FIELD [1] 7:18
FIGURE [5] 11:16,17
12:21,23 14:20
FIGURED [1] 15:23
FILE [13] 12:4,5 15:5,8
15:17 17:2,2,16 21:4 44:7
44:8,12,17
FILED [8] 20:12,14,17
21:4,8 26:22,23 30:14
FILL [3] 19:23 20:2 26:15
FILLED [8] 19:16 21:24
22:5,7 23:8 27:23 30:17
40:9
FIRM [1] 2:15
FIRST [3] 5:3 41:10 48:7
FIVE [2] 14:5 23:9
FIXED [1] 32:17
FOLDERS [1] 21:6
FOLLOW [1] 21:14
FOLLOWS [1] 5:5
FOREVER [2] 21:10
21:11
FORM [12] 19:2,8,16
21:23 22:2 24:15 26:15
27:22 30:13,22 31:8 37:10

FORMALITIES [1]
3:8
FORMS [6] 21:17 22:17
23:8 24:9,10,12
FORTH [2] 2:9 48:12
FOUR [1] 7:9
FRANKLIN [1] 48:3
FREQUENTLY [1]
31:4
FRIENDS [1] 40:6
FRONT [1] 1:23
FULL [1] 5:8

-G-
GAIN [1] 9:5
GAMMA [1] 28:8
GARY [1] 28:17
GAY [1] 2:16
GENTLEMEN'S [1]
28:21
GIVEN [6] 8:9 31:18
33:12 37:9,11 48:12
GIVING [1] 18:12
GLANCED [2] 44:7,13
GLOW [8] 13:8,9,12,22
14:1,6,22,23
GOES [4] 10:15 11:4
16:6,21
GONE [1] 32:8
G [REDACTED] [1] 21:1
GROUP [5] 8:22,24 9:2
10:7,17
GROVE [1] 2:13
GUARD [1] 40:4
GUESS [2] 15:16 22:24

-H-
HAND [2] 47:8 48:18
HAPPENING [1] 31:3
HAPPY [1] 5:20
HEAD [2] 9:17,23
HEADING [1] 11:4
HEALTH [10] 6:23 7:13
7:17 8:20 10:3,4,5,5 18:8
19:9
HEAR [2] 28:13,15
HEARD [3] 15:24 16:1
35:6
HELD [2] 7:15 8:24
HELP [1] 25:18
HEREBY [1] 48:6
HEREIN [1] 3:4
HEREINAFTER [2]
2:9 5:4
HERETOFORE [1]
48:12
HEREUNTO [2] 47:7
48:17
HIGH [1] 6:15
HIGHLY [1] 26:5
HISTORICAL [2]
43:19 44:11
HISTORY [1] 44:10
HOLD [1] 6:16
HOLDER [1] 10:22
H [REDACTED] [1] 38:2
HOSPITAL [1] 7:7
HUMAN [1] 12:15
HUNDREDS [2] 29:21
32:8

-I-
IDEA [2] 17:4 36:12
IMAGINE [1] 22:23
IMMEDIATE [3] 9:9
9:14 18:15
INACCURATE [2]
32:23,24
INC [2] 1:22 2:18
INCIDENTAL [2]
35:16 41:20
INCLUDE [3] 21:22
36:15 40:10
INCLUDED [2] 40:10
42:1
INCORRECT [2] 32:23
33:1
INDICATE [3] 28:9
30:7,16
INDICATED [7] 10:7
22:8,16 33:12 34:12 38:24
40:8
INDICATES [1] 13:11
INDICATION [1]
19:23
INDICATOR [2] 13:22
14:7
INDIVIDUAL'S [1]
29:3
INITIALS [1] 22:4
INITIATE [1] 23:18
INITIATED [5] 21:22
30:22 37:10 38:19 40:17
INPUT [2] 10:18 12:15
INPUTED [1] 22:17
INSERT [1] 10:23
INSPECT [2] 27:7,15
INSPECTED [1] 13:6
INSPECTING [1]
26:13
INSTANCE [1] 39:24
INSTANCES [4] 14:16
23:17 30:20 31:8
INSTRUCTION [1]
18:12
INTEREST [1] 48:15
INTERNAL [2] 33:14
34:4
INTRODUCED [1]
5:11
INVESTIGATE [1]
42:19
INVESTIGATED [1]
33:22
INVESTIGATION
[5] 33:14 34:3 37:15 39:1
39:6
INVESTIGATIONS
[1] 33:18
INVOLVED [2] 40:11
42:20

-J- J [1] 2:12 [redacted] [1] 2:17 JANUARY [1] 7:4 [redacted] [10] 1:6 2:22 5:12 8:8 21:2,2 25:5,9 29:4 31:15 [redacted]'S [2] 31:17 33:19 JOB [8] 7:15,20 8:19,21 8:24 18:23 35:4,19 [redacted] [1] 38:2 JUDGE [1] 1:8 JULY [2] 41:2,6

-K- K [redacted] [5] 20:23 21:1 32:11 38:10,14 KEPT [3] 17:20 21:9,21 KNOWLEDGE [5] 33:10,17 34:4,6 44:23 KNOWN [1] 31:3

-L- LAB [13] 6:23 7:7 10:1,4 10:6,8 17:22 18:8 19:9 25:15 34:15 35:5,20 LARGEST [1] 23:23 LAST [3] 14:5,9,12 LAW [1] 2:15 LAWSUIT [4] 5:12 38:20,22 39:16 LAWYER [1] 33:24 LEADER [5] 8:22 9:1,2 10:7,17 LEANED [1] 25:17 LEAVES [1] 36:1 LEVEL [1] 30:17 LEVELS [3] 35:5,6,9 LIMIT [2] 18:1,10 LIMITING [1] 20:24 [redacted] [9] 1:15 2:2 5:2 5:9,10 47:2,5 48:7,13 LITIGATION [1] 48:16 LOCKHEED [7] 1:9 2:18 5:13 6:21 33:15 34:13 39:10 LOOK [2] 13:11 14:23 LOOKED [1] 40:16 L [redacted] [1] 21:1 LOST [2] 24:24 25:4

-M- M [11] 1:15 2:2,4 3:6 5:2 47:2,5 48:4,7,13,21 M-A-E [1] 5:9 MACHINE [11] 10:19 11:11,13,20 12:1,17 13:12 13:16,18 14:21 25:2

MACHINES [2] 8:23 9:8 [redacted] [1] 5:9 MAG [4] 11:24 15:11,19 17:20 MAGNETIC [3] 11:18 15:11 17:21 MAILING [1] 6:8 MALFUNCTION [1] 14:22 MANIPULATE [1] 11:19 MANIPULATING [1] 15:16 MANNER [1] 26:7 MANUALLY [1] 12:5 MARIETTA [1] 38:20 MARRIED [1] 6:12 M [redacted] [1] 9:11 MARTIN [8] 1:9 2:18 5:13 6:21 33:15 34:13 38:20 39:10 MATTER [1] 8:10 MAY [4] 3:5,6 6:4 48:19 MEAN [5] 10:11 18:19 26:8 29:17 39:8 MEDICAL [1] 6:17 M [redacted] [3] 28:17 45:12,17 M [redacted]'S [2] 42:1 42:10 MEMORIAL [1] 7:7 MEMORY [2] 24:21 32:7 MERGE [1] 15:12 MESSED [1] 9:20 M [redacted] [1] 14:8 MIGHT [1] 23:18 M [redacted] [7] 9:20 14:8 18:17 19:15 25:16,17 32:12 MILLIREM [1] 35:12 MILLIREMS [1] 29:20 MIND [1] 44:21 MINUTE [1] 10:2 MISDEMEANOR [1] 7:23 MONTH [2] 15:21 37:2 MONTHLY [1] 23:5 MONTHS [1] 7:10 MOUND [1] 6:11 MS [2] 34:12 45:23 MUST [1] 35:22

-N- NAME [7] 5:8,10 21:22 22:3 24:10 34:12 40:10 NAMES [5] 22:12 28:21 42:1,11 45:13 NEED [4] 25:18,19 31:11 34:24

NEEDED [1] 19:20 NEW [6] 11:3 15:9,13 17:7,8,9 NORMAL [1] 20:13 NORMALLY [4] 14:19 19:14,15,18 NOTARY [4] 2:5 47:12 48:5,21 NOTE [2] 26:12 42:9 NOTES [1] 3:8 NOTHING [3] 13:4 25:21 48:9 NOTICE [1] 3:10 NOW [18] 9:23 10:10 11:1 12:23 15:14,15,17 17:22 18:18 19:1 21:3 22:15 23:13 26:1 35:19 36:23 37:8 40:8 NOWHERE [1] 22:12 NUMBER [9] 6:5 10:24 19:4 24:13,13,19 40:11 40:14 42:21

-O- OBJECTION [1] 32:19 OBSERVATIONS [1] 32:14 OCCASION [1] 43:18 OCCASIONALLY [1] 23:21 OCCUR [1] 19:18 OFF [1] 5:11 OFFENSE [1] 7:24 OFFICE [4] 25:23 26:9 47:8 48:18 OFFICER [1] 3:11 OFFICIAL [1] 48:18 OFTEN [1] 15:20 OHIO [13] 1:2,23 2:6,7 2:13,17,19 6:11 47:8 48:2 48:6,18,21 OLD [2] 15:19 25:16 OLSEN [1] 2:17 ONCE [7] 15:21 17:19 23:14,14,15,16 31:1 ONE [22] 6:17 11:3,3 13:21 15:13 16:9 18:14 18:15 19:7 23:21,22 25:9 29:12 30:21 33:4,12 34:4 38:2 42:12,21,23 44:6 ONE'S [1] 6:17 ONES [2] 13:11 21:3 ONGOING [1] 34:4 OPINION [2] 29:19 32:14 ORALLY [1] 42:8 ORDER [1] 19:12 ORDERED [4] 21:13 21:17 25:9 30:18 ORDERING [1] 31:22 OUTSIDE [1] 14:2 OWN [1] 18:5

-P- P.O [2] 2:18 6:10 PAGE [1] 4:3 PAGES [1] 23:10 PAPER [16] 18:23 19:2 24:14 28:15,18,19,22,24 30:11 41:23 42:5,9,11 43:24 45:14,19 PAPERWORK [3] 21:21 22:12 30:6 PARAMETERS [2] 14:2,2 PART [1] 33:14 PARTICULAR [8] 12:24 15:4 30:21 36:8 38:18 40:11,14 44:5 PARTIES [1] 3:4 PARTY [1] 48:15 PAST [3] 32:16,16 36:9 PC [10] 12:2,8,21 13:14 13:19,21,22 14:17 17:14 44:3 PEASE [1] 2:16 PENDING [1] 5:13 PEOPLE [10] 8:22 9:7 18:11 20:19 22:7,8,11,17 29:12 38:15 PEOPLE'S [1] 15:12 PERFORMED [2] 39:1 39:5 PERIOD [1] 44:20 PERIODS [2] 43:3,5 PERSON [10] 9:22 10:24 14:6 16:21 20:18 21:22 30:17,18 31:22,23 PERSON'S [2] 19:19 22:19 PHYSICIST [3] 10:3,5 10:6 PHYSICS [8] 6:23 7:13 7:17 8:20 10:4 18:8 19:9 44:4 PIECE [10] 19:2 28:15 28:16,22,24 41:23 42:9 42:11 45:14,19 PIKE [1] 2:6 PIKETON [8] 2:19 6:10 6:11 7:1,13 8:9,17 47:8 PLACE [4] 3:9 24:18 32:7 48:13 PLAINTIFFS [3] 1:7 2:3,14 PLANT [11] 6:24 7:3 8:9 8:16 35:6,21 36:1,19 37:23 40:3,5 PLUS [1] 37:3 POSITION [1] 13:10 POTENTIAL [1] 35:21 PRACTICE [2] 17:5 20:13 PREPRINTED [1] 19:8

PRESENCE [2] 3:6 47:5 PRESENT [3] 2:22 6:7 7:20 PRESENTLY [3] 5:13 6:12,20 PRESUMABLY [1] 20:5 PRETTY [2] 7:15,20 PRINTOUT [1] 40:16 PRINTOUTS [1] 21:7 PRINTS [1] 44:10 PROBLEM [1] 10:13 PROCESS [2] 10:21 17:11 PROFESSIONAL [2] 2:4 48:4 PROMOTED [3] 9:5 39:13,18 PROMOTION [1] 9:3 PROPERLY [1] 30:14 PROTECT [1] 35:1 PROTECTION [1] 34:20 PUBLIC [4] 2:5 47:12 48:5,21 PULL [1] 44:21 PULLING [1] 24:20 PUNCHES [1] 13:11 PURSUANT [3] 2:8 3:10 48:11 PUT [14] 11:3,11 12:4,5 13:8 15:4 17:12,15,16,19 18:21 21:6 24:10,12 PUTTING [1] 12:17

-Q- QUALIFICATIONS [1] 3:10 QUARTER [14] 11:2 15:22 23:14,15,16,24 24:5 36:5,9 37:3,4 41:3,8,11 QUARTERLY [6] 11:1 23:6,17 36:1,13,22 QUESTIONS [4] 5:15 5:16 8:7 45:22 QUITE [3] 9:13 23:9,9 QUOTES [1] 11:18

-R- R [1] 48:1 RADIATION [4] 34:20 35:7,22 36:8 RAW [5] 11:17,21,22 12:3,9 READ [16] 8:23 9:7,8 10:18 11:3 13:3,6 15:23 16:22 17:12 24:2 35:24 36:4,13,18 37:1 READING [24] 11:14 11:21,23 12:9 13:21 14:12 14:16 18:2 29:7 32:17

36:7 38:19 40:1 41:4,14
41:17,21 42:4,16,17,23
44:16,24 45:4
READINGS [18] 8:8
13:13 17:23 18:13 25:9
30:21 31:7 32:17,22 33:1
33:1 37:11 41:7 42:20
43:1,8,10 44:20
READOFF [1] 11:5
READS [5] 11:1,5,18
15:22 23:17
REALLY [1] 39:23
REASON [6] 5:20 16:9
17:15 25:2 31:18,23
RECEIVE [3] 9:3 26:19
28:2
RECESS [1] 33:7
RECOLLECTION [1]
25:10
RECORD [2] 5:11 43:19
RECORDS [9] 15:12
21:9 29:3 32:15,16,17,18
33:19 39:15
REGULAR [1] 24:3
REINSTITUTED [1]
44:16
RELATIVE [1] 48:15
REMAINED [2] 27:16
27:18
REMEMBER [9] 25:13
32:3 39:22,22 40:12,24
41:3 43:7 44:6
REPHRASE [4] 5:17
9:4 16:15,16
REPORTER [2] 2:5
48:5
REPORTING [1] 1:22
REPRESENT [2] 5:12
34:13
REPRESENTED [1]
41:4
REQUEST [1] 41:14
REQUESTED [1]
42:13
REQUIRE [2] 35:17
41:18
REQUIRED [1] 22:20
RESIDENCE [1] 6:7
RESIDENCY [1] 7:10
RESPECT [2] 35:7 39:1
RESPECTIVE [1] 3:4
RESPECTS [1] 48:11
RESPONSIBILITIES
[1] 8:21
RESPONSIBILITY
[1] 20:16
RESTARTING [1]
15:14
REVIEW [7] 13:5 14:6
14:23 19:19 43:19 44:9
44:15
REVIEWED [3] 12:23
13:4 44:11

REVIEWING [1] 17:23
REVIEWS [2] 14:3 44:5
RHYTHM [1] 11:24
RHYTHMS [1] 11:18
R [REDACTED] [2] 9:16,18
RIGHT [16] 7:10 9:9
10:15 12:15 13:10,20
14:23 15:14 22:14 31:5
35:22 36:10 38:16 40:13
41:9 43:12
RISE [1] 16:18
ROAD [1] 6:11
R [REDACTED] [1] 2:15
R [REDACTED] [5] 8:15 9:19,19
37:12,24
RUN [3] 8:23 11:24 12:8

-S-
S [1] 2:17
S [REDACTED] [1] 1:8
SATER [1] 2:16
SAW [4] 28:15,21 40:5
41:24
SAYS [1] 13:10
SCHOOL [1] 6:15
SCIENTIFIC [1] 28:6
SCIOTO [1] 7:7
SCREEN [2] 30:8 44:14
SEAL [2] 47:8 48:18
SECOND [2] 33:5 41:11
SECURE [1] 32:18
SECURITY [1] 6:5
SEE [11] 13:2,6,9,10
21:12 24:19 27:15 30:11
36:22 44:1 45:19
SEND [1] 20:19
SENDING [1] 20:18
SENT [1] 15:11
SEPARATE [3] 12:1
13:14 19:5
SERVICE [1] 1:22
SERVICES [2] 2:18
5:14
SET [4] 2:9 47:7 48:12
48:17
SETTLED [2] 39:19,21
SEYMOUR [1] 2:16
SHALL [1] 3:11
SHALLOW [14] 19:21
24:20 25:3 27:4,5,21 28:4
28:7 41:14,15,17 43:6,14
44:16
S [REDACTED] [4] 2:4 3:6 48:4
48:21
SHAWNEE [1] 6:19
SHEET [8] 18:20 19:1,5
19:24 20:8 24:14 26:20
40:9
SHEETS [2] 20:11,20
SHORTHAND [2] 3:5
3:7

SHOWED [1] 25:23
SHOWING [1] 17:14
SHOWS [1] 15:3
SIGNAL [1] 11:4
SIGNATURE [1] 46:1
SIGNED [2] 19:11 47:5
SIGNIFIES [1] 24:24
SIGNIFY [1] 24:23
SIMPLY [1] 40:10
SINGLE [1] 24:14
SITE [3] 37:23 40:3,5
SITUATION [1] 8:3
SIX [1] 7:9
SLIP [1] 26:13
S [REDACTED] [27] 1:15 2:2,5,2
5:9 9:19,19,20 14:8 18:17
19:15 25:17 28:9 29:11
32:4,12 34:12 38:18 39:24
40:14 41:1,24 44:24 45:23
47:2,5 48:7,13
S [REDACTED] S [1] 9:20
SOCIAL [2] 6:5 40:6
SOMEONE [1] 14:2
SOMETIME [1] 25:10
SOMETIMES [6]
14:21 19:6,7 23:9,22 37:5
SOMEWHAT [1] 39:3
SORRY [5] 9:19,20 10:3
12:14 42:22
SORT [2] 24:17 25:17
SOUTH [1] 1:23
SOUTHERN [1] 1:2
SPEAK [1] 15:8
SPECIFIC [1] 44:9
SPECIFICS [1] 43:9
SS [1] 48:2
STAPLED [2] 21:8
30:13
START [1] 14:11
STARTED [2] 15:9,13
STATE [7] 2:5 5:8 6:1
6:19 48:2,5,21
STATEMENT [2] 8:9
37:9
STATEMENTS [3]
8:14 33:13 37:11
STATES [1] 1:1
STAY [1] 34:24
S [REDACTED] [2] 2:12 5:10
STICKY [3] 19:21 26:12
31:19
STILL [2] 10:20 11:7
STIPULATED [1] 3:3
STIPULATIONS [3]
2:8 3:1 48:11
STORED [1] 17:22
STREET [3] 1:23 2:7,16
STRIKE [9] 14:10 15:2
21:19 22:18 25:7 27:1
30:5 31:16 33:11

STUFF [3] 14:24 16:23
34:24
SUBJECT [1] 8:10
SUBMITTED [1]
18:22
SUBSEQUENTLY
[1] 28:13
SUCH [1] 29:16
S [REDACTED] [1] 39:10
SUIT [1] 39:19
SUPERVISOR [11]
9:10,12,14,17,23,24 10:1
10:4,6 18:16 45:10
SURROUNDING [1]
25:14
SURVEYOR [1] 7:18
SUSPICION [2] 13:3
45:11
SUSPICIOUS [1] 44:1
SWORN [2] 5:3 48:8
SYSTEM [10] 15:9,19
17:7,8,9 22:21 27:6,12
29:13 31:12

-T-
T [2] 48:1,1
TABLE [1] 4:1
TAIT [6] 2:15 4:5 32:19
34:11,13 45:21
TAKES [1] 11:5
TAKING [3] 3:9 12:16
48:6
TAPE [6] 15:10,11,11
17:20,21,22
TAPES [1] 15:19
TECH [1] 7:7
TECHNOLOGIST [1]
8:20
T [REDACTED] [1] 9:11
TEMPORARIES [1]
37:1
TEMPORARY [1]
15:22
TERM [2] 10:10 35:6
TERMINOLOGY [2]
15:24 16:1
TERMS [2] 35:19 38:17
TESTIFIED [1] 42:22
TESTIFIES [1] 5:5
TESTIMONY [1]
41:13
THANK [2] 45:22,23
THEREUPON [2] 5:1
46:3
THERMOLUMINESCENCE
[1] 10:12
THIRD [1] 41:8
THOUGHT [2] 42:7,22
THOUSANDS [2]
29:22 32:8
THREE [7] 23:22 42:18

42:24 43:1,3,7 44:5
THROUGH [6] 11:4
13:19 15:14 18:10 19:12
39:13
THROUGHOUT [1]
24:7
TIMES [3] 8:5,12 40:22
TIMING [1] 38:17
TITLE [3] 8:19 9:22,23
TLD [21] 10:10,12,23
18:20 19:1,24 21:17,23
22:2,16 24:9,15 25:15
26:15,19 27:22 30:12,22
31:7 35:22 40:8
TLDS [1] 35:24
TODAY [4] 5:14 8:10
8:19 44:20
TRACED [1] 16:22
TRAFFIC [1] 7:24
TRAIL [1] 30:12
TRAIN [2] 8:22 9:7
TRAINING [4] 34:20
34:23 35:3,4
TRANSCRIBE [1] 3:7
TRANSCRIBED [1]
3:8
TRANSCRIPT [1] 47:4
TRICK [1] 5:24
TRUE [1] 29:24
T [REDACTED] [1] 14:8
TRUTH [3] 48:8,8,9
TRYING [4] 10:13
30:10,10 37:22
TUESDAY [1] 46:4
TWICE [3] 8:6,13 31:1
TWO [11] 6:10,16 7:17
7:19 9:2 15:10,13 28:21
33:13 42:16,17
TYPE [5] 4:3 21:13 22:20
23:13 30:6
TYPES [3] 30:3,4,11
TYPICAL [1] 26:10
TYPICALLY [4] 14:5
21:9 31:15,16

-U-
UNASSIGNED [1]
16:20
UNDER [3] 8:22 14:19
31:6
UNDERSTAND [5]
5:16,22 34:14 35:20 42:7
UNITED [1] 1:1
UNKNOWN [1] 16:13
UNUSUAL [1] 26:5
UP [15] 9:21 11:2,20 12:3
12:21 14:16 15:9 17:7,19
17:21 21:14 40:16 44:8
44:13,21
USED [1] 24:21
USUALLY [2] 15:21
26:11

UTILITY [2] 2:18 5:14

37:19

-V-

VERBALLY [1] 5:17
VIEWED [1] 44:7
VIEWING [1] 30:8
VISITOR [2] 35:21 36:1
VISITORS [3] 16:12
36:16,19
VORYS [1] 2:16
VS [1] 1:8

-W-

WAIT [1] 10:2
WAIVED [2] 3:12 46:1
W [REDACTED] [1] 6:11
W [REDACTED] [10] 1:6
2:22 5:12 37:9 38:1,4,7
40:2,15 43:1
W [REDACTED] S [10] 8:8
25:6,9 29:4 31:15 36:4
37:11 40:1 43:19 44:11
WALK [1] 23:1
WALKS [2] 25:16,17
WAVERLY [1] 2:7
WEAR [3] 10:24 35:1,22
WEEKLY [1] 23:5
W [REDACTED] [2] 8:15
37:12
WHATSOEVER [1]
48:16
WHEREOF [2] 47:7
48:17
WHOLE [3] 44:7,8 48:8
WITHIN [1] 2:5
WITHOUT [2] 30:22
31:7
WITNESS [4] 2:2 3:7
47:7 48:17
WORKED [3] 7:13,17
40:4
WORKS [1] 10:21
WRONG [4] 13:2,4
25:20,21

-Y-

YEAR [5] 9:13 23:14
24:6,7 31:1
YEARLY [1] 23:6
YEARS [12] 7:17,19 9:2
14:5,12,15 15:10,13 25:6
26:1 32:16 34:16
YELLOW [3] 19:21
26:12 31:19
YET [1] 27:13
YOURSELF [2] 20:20
35:2

-Z-

Z [REDACTED] I [1]