



1 FOREMAN OF THE GRAND JURY: Sir, if  
2 you'll stand next to the chair there and raise your  
3 right hand, I'll swear you in. Do you solemnly  
4 swear that you will true answer make to such  
5 questions that may be propounded by the Grand Jury  
6 or under its direction so help you God?

7 THE WITNESS: Yes, sir, I do.

8 FOREMAN OF THE GRAND JURY: Please  
9 be seated and state your name for the Grand Jury  
10 reporter.

11 THE WITNESS: My name is Ken Crow.

12 MS. PATTERSON: I'll ask the Grand  
13 Jury reporter to mark as Grand Jury Exhibit 50 a  
14 copy of a subpoena.

15 (The instrument referred to was  
16 here marked as Grand Jury Exhibit No. 50 for  
17 identification, after which time the following  
18 proceedings were had:)

19 QUESTIONS BY MS. PATTERSON:

20 Q. Mr. Crow, I'll ask you to examine that  
21 copy and tell the Grand Jury whether that is a copy  
22 of the subpoena that was served upon you. And I  
23 will advise you, sir, that the second page is  
24 simply a service page.

25 A. Yes, Ms. Patterson, I believe that's --

1           \_Q.    And that contains all the attachments  
2 that you received; is that correct?

3           A.    I believe it does, yes.

4           \_Q.    All right. Mr. Crow, I gather that  
5 during the course of your compliance with the  
6 subpoena that you have read thoroughly the  
7 attachment to the subpoena; is that correct?

8           A.    Yes.

9           \_Q.    And I will ask you to examine the  
10 documents that are sitting on the table in front of  
11 you because they have been taken out of the box and  
12 will you examine those and tell the Grand Jury  
13 whether those are the documents that you and  
14 Mr. Moody have produced to the Grand Jury today.  
15 And for the record I will note that you and  
16 Mr. Moody carried the box in before the Grand Jury  
17 today together. And I'll ask you to examine these  
18 documents, please.

19          A.    Okay. I can see them.

20          \_Q.    All right. And are these the documents  
21 that are called for by the subpoena?

22          A.    Yes, I believe they are. These are the  
23 documents that were in this box when I brought them  
24 in here; is that not correct?

25          \_Q.    Yes, sir.

1           A.    Okay.

2           Q.    And are any -- are there any documents  
3 called for by the subpoena which you have not  
4 produced?

5           A.    To the best of my belief and knowledge  
6 that's all of the documents.

7           Q.    And -- well, have you carefully  
8 searched for all the documents called for by the  
9 subpoena?

10          A.    Yes, I have.

11          Q.    And to the best of your knowledge  
12 have you complied with the subpoena in all  
13 respects?

14          A.    Yes, I have.

15          Q.    And have you transferred any documents  
16 to anyone since you received a copy of the  
17 subpoena?

18          A.    No.

19                    MS. PATTERSON: All right. I will  
20 ask the foreman to excuse Mr. Crow.

21                    FOREMAN OF THE GRAND JURY: Mr.  
22 Crow, you may be temporarily excused if you will  
23 please wait outside in case we have any questions.

24                    THE WITNESS: I certainly will.

25                    (At this time the witness left the

1 Grand\_Jury room, and upon his return the following  
2 proceedings were had:)

3 FOREMAN OF THE GRAND JURY: Please  
4 have a seat. I'll just remind you you're still  
5 under oath.

6 THE WITNESS: All right, sir.

7 QUESTIONS BY MS. PATTERSON:

8 Q. Mr. Crow, the Grand Jury reminded me  
9 that I neglected to advise you of your rights. As  
10 you know, you are appearing before a Federal Grand  
11 Jury which is investigating violations of Federal  
12 law. You have a right to refuse to answer any  
13 question if an answer might tend to incriminate  
14 you. Do you understand that?

15 A. Yes, ma'am, I do.

16 Q. And anything you do say can be used  
17 against you in a later court of law. Do you  
18 understand that?

19 A. Yes, ma'am, I do.

20 Q. You also have a right to consult with a  
21 lawyer and to have that lawyer present outside the  
22 Grand Jury room. Have you had an opportunity to  
23 consult with a lawyer in connection with your  
24 appearance here today?

25 A. Yes, I have.

1 -Q. And who is that lawyer, please?

2 A. Steve Brittain.

3 Q. Is he present outside the Grand Jury  
4 room today?

5 A. Yes, he is.

6 Q. Now, have you had ample opportunity to  
7 consult with Mr. Brittain in connection with your  
8 appearance here today?

9 A. Yes, I have.

10 Q. All right. Now, Mr. Crow, I asked you a  
11 number of questions while ago about whether these  
12 were the records called for by the subpoena and  
13 whether you have complied with the subpoena in  
14 all respects. And are your answers to those  
15 questions -- do they remain the same?

16 A. Yes, they do.

17 Q. And am I correct that you have testified  
18 and that you continue to testify that you have not  
19 transferred any documents and that you are not  
20 withholding any documents that are responsive to  
21 the subpoena?

22 A. That's correct.

23 MS. PATTERSON: I'll ask the  
24 foreman to excuse you.

25 THE WITNESS: Okay.

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FOREMAN OF THE GRAND JURY: Thank  
you, Mr. Crow.

(Witness excused)

1 STATE\_OF TEXAS )  
2 COUNTY OF TRAVIS)

3 I, SHERRI SANTMAN FISHER, a  
4 Certified Shorthand Reporter and Notary Public in  
5 and for the County of Travis, State of Texas,  
6 having been duly sworn in as Grand Jury Reporter,  
7 hereby certify that the foregoing pages constitute  
8 a full, true, and correct transcript of a portion  
9 of the proceedings had and testimony adduced in the  
10 foregoing cause at the time and place as heretofore  
11 set forth, that the interrogatories and answers  
12 thereto by the witness were taken down by me in  
13 shorthand and thereafter reduced to typewriting  
14 under my direction.

15 AS WITNESS MY HAND AND SEAL OF  
16 OFFICE, this the 27th day of June, 1986.

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SHERRI SANTMAN FISHER, Notary  
Public in and for Travis County,  
Texas