

## **APPENDIX**

### **PROPOSED REQUESTS FOR ADMISSION, INTERROGATORIES, DOCUMENT REQUESTS, AND SUBPOENAS**

#### **Proposed Requests for Admission**

1. Admit or deny that Radio Martí and TV Martí broadcasts can be heard or viewed in the Miami area by members of the public.
2. Admit or deny that Radio Martí and TV Martí paid journalists who also published articles (whether on Radio and TV Martí or elsewhere) about Movant's criminal case.
3. Admit or deny that at least some of the articles referred to in request (2) alleged Movant's guilt of at least some of the offenses in the Indictment prior to the verdict.
4. Admit or deny that some of the articles referred to in request (2) alleged Movant's guilt of Count 3 of the Indictment prior to the verdict.
5. Admit or deny that the messages published by the journalists referred to in request (2) did not contradict the messages they broadcast while being paid for the U.S. government.
6. Admit or deny that the messages published, spoken, or otherwise communicated by the journalists referred to in request (2) pursuant to their contracts with the government did not contradict the messages they printed, stated, or otherwise communicated in other media outlets.
7. Admit or deny that at least some of the articles referred to in request (2) contained false, hostile and inflammatory statements about Movant.
8. Admit or deny that the United States federal government knew about the false, hostile and inflammatory statements referred to in request (7) during the trial and appeals.
9. Admit or deny that the United States federal government did nothing to discourage journalists who received funds from it to refrain from publishing or otherwise giving commentary about the events of this case.
10. Admit or deny that the United States federal government did nothing to discourage journalists who received funds from it to refrain from publishing or otherwise communicating false information in other media outlets about the events of this case.

11. Admit or deny that the United States federal government encouraged or required journalists who received funds from it to express views consistent with those of the United States federal government.
  
12. Admit or deny that the United States federal government encouraged or required journalists who received funds from it to express false, hostile, and inflammatory messages about Movant.

## **Proposed Interrogatories**

### **Instructions**

1. The word “you” refers to the entire United States federal government, including, without limitation, the U.S. Department of Justice, the U.S. State Department, the U.S. Information Agency, the Broadcasting Board of Governors, the Office of Cuba Broadcasting, the stations Radio Martí and TV Martí, and the Federal Bureau of Investigation, as well as their employees and agents.
2. The phrase “U.S. State Department” or “State Department” includes the U.S. Information Agency, the Broadcasting Board of Governors, the Office of Cuba Broadcasting, and the stations Radio Martí and TV Martí, as well as their employees.
3. The phrase “prosecution team” refers to all individuals at the U.S. Department of Justice who had a role in the prosecution of Movant and his co-defendants, as well as any law enforcement or other executive branch personnel who meaningfully contributed to the investigation and prosecution.
4. The phrase “this case” refers not only to this § 2255 proceeding, but also to the underlying criminal case.
5. The phrase “the events of this case” refers to the alleged espionage activities of Movant and his co-defendants in this case (including those who pled guilty), to the shootdown of the Brothers to the Rescue aircraft in 1996 that formed the basis for the charges in Count 3 of the superseding indictment, as well as to the subsequent investigation, arrests, prosecution, and judicial proceedings relating to those events.
6. The phrase “paid journalist” refers to any individual who accepted funds from you and who also published or otherwise communicated any public message, in any media outlet—including but not limited to print, television, radio, and publicly accessible websites—about the events of this case.

### **Interrogatories**

1. Please identify all individuals who contributed to the responses to these interrogatories. Please include names and job titles. For individuals who contributed information in response to only some interrogatories, please also identify the relevant interrogatories.
2. Please identify all members of the prosecution team, as that term is defined in Instruction 3. In identifying these individuals, please include their names, current job titles, any

previous job titles dating back to the start of the events of this case, and current contact information.

**Interrogatories 3-20 relate to your relationship with the media, including paid journalists, as that term is defined in instruction 6.**

3. Please identify all of the paid journalists. If you have reason to believe that there may be paid journalists whose identities are unknown to you, please also state the facts upon which you base that belief.
4. For each paid journalist:
  - a. Please provide the paid journalist's name.
  - b. Please specify the amount of the payments made by you to the paid journalist.
  - c. Please describe the specific services that the paid journalist was expected to render in exchange for the payment.
  - d. Please state whether the paid journalist was expected to express any particular viewpoint regarding the events of this case, and if so, please state that viewpoint.
  - e. Please state whether you regarded that paid journalist as an employee, an independent contractor, or other (if other, please describe that status).
  - f. Please state whether the paid journalist had a government security clearance.
  - g. Please state whether the paid journalist's other employers (if any) knew that the paid journalist was being compensated by you.
5. Were any of the paid journalists employees or former employees of yours? If so, then for each such individual:
  - a. Please provide the individual's name.
  - b. Please identify the individual's previous or contemporaneous government position.
  - c. For former employees, please describe the circumstances under which the paid journalist left government employment, including the reason for the paid journalist's departure, if known.
  - d. Please state whether employee or former employee's status as such influenced the decision to hire that individual as a paid journalist.

6. Did any member of the prosecution team have, at any time, contact with any paid journalist? If so, please identify the individual and describe the nature of the contact.
7. To the extent not stated in response to (6), did any member of the prosecution team, or any superior of any member of the prosecution team have, at any time, contact with any of the following individuals: Pablo Alfonso, Wilfredo Cancio Isla, Enrique Encinosa, Julio Estorino, Helen Ferré, Alberto Müller, Ninoska Perez, Ariel Remos, Maria Elvira Salazar, or Oscar Haza? If so, please identify the individual and describe the nature of the contact.
8. To the extent not stated in response to (623) and (7), did any member of the prosecution team, or any superior of any member of the prosecution team, have, at any time during the course of the events in this case, contact with any other journalist (not necessarily a paid journalist) who published materials relating to the events of this case? If so, please identify the individual and describe the nature of the contact.
9. Did any member of the prosecution team have, at any time during the course of the events in this case, contact with any individual who had appeared on Radio Martí or TV Martí? If so, please identify the individual and describe the nature of the contact.
10. Did any member of the prosecution team discuss the events of this case with any other member of the media either before or during the trial? If so, then please identify the relevant individual(s) and media contacts, and describe the timing, circumstances, and contents of the statements made to the media.
11. Either before or during the trial, was any member of the prosecution team aware that the U.S. State Department was paying money to journalists who were also publishing materials about the events of this case? If so, please identify the relevant member of the prosecution team.
12. Was the U.S. State Department aware that some of the paid journalists were publishing materials about the events of this case and about the trial in other media outlets?
13. If the answer to (12) is “Yes,” then what, if anything, did the U.S. State Department do in response to that fact?
14. Did you or any employee or agent of yours ever provide a paid journalist with content for publication in a private (*i.e.*, non-government) media source (*e.g.*, a newspaper, broadcast, or website), which content was attributed to the paid journalist? If so, please

identify the relevant individuals and describe the relevant interaction, including the timing and the substance of the content.

15. Did you or any employee or agent of yours ever edit a paid journalist's content prior to its publication in a private media source, which content was attributed to the paid journalist? If so, please identify the relevant individuals and describe the relevant interaction, including the timing and the substance of the content.
16. Did you or any employee or agent of yours ever review a paid journalist's content prior to its publication in a private media source, which content was attributed to the paid journalist? If so, please identify the relevant individuals and describe the relevant interaction, including the timing and the substance of the content.
17. Did you or any employee or agent of yours ever tell or otherwise communicate to any journalist that you (or any of your agencies or employees) wished for the journalist to take a particular stance on the events of this case, whether in a media source or elsewhere? If so, please describe the interaction, including the names of the relevant individuals, the timing, and the substance of the discussion.
18. Who decides whether paid journalists should be treated as employees or independent contractors?
19. Did you prepare any documents relating to the classification of paid journalists as either employees or independent contractors? If so, please identify those documents, as well as the individuals who prepared them, and the individuals who represented the journalists in negotiations with you.
20. Did you contemporaneously disclose to the private media employers of paid journalists that the paid journalists were receiving funds from you? If so, please describe those disclosures.
21. Did you contemporaneously disclose to the public that the paid journalists were receiving funds from you? If so, please describe those disclosures.
22. Did any paid journalist attend any part of the trial in this case?

**Interrogatories 23-25 relate to communications between the Department of Justice and the U.S. State Department regarding the events of this case.**

23. Did any member of the prosecution team, or any superior of a member of the prosecution team, consult or seek to consult any official or employee of the U.S. State Department regarding paid journalists? If so, please describe the substance of those conversations.

24. Did any employee or agent of the U.S. State Department provide any input to any member of the prosecution team about the events in this case? If yes, then please describe the nature of the interaction, including the names of the relevant individuals, the timing, and the substance of the discussion.
25. Did any individual at the U.S. State Department provide any information, perspective, or input of any kind to any individual at the U.S. Department of Justice (not limited to individuals on the prosecution team) about the events in this case? If yes, then please describe the nature of the interaction, including the names of the relevant individuals, the timing, and the substance of the discussion.

**Interrogatories 26-42 relate to Radio Martí and TV Martí.**

26. For every program on Radio Martí and TV Martí that discussed the events of this case:
  - a. Please provide the name of the program.
  - b. Please provide the date and time of any broadcast that discussed the events of this case.
  - c. Please identify the individuals who discussed the events of this case on the air.
  - d. If the individuals in (c) did not themselves author the statements they made on the air, then please identify the author of those statements.
27. How many journalists, commentators, and other on-air personalities regularly appear on Radio Martí and TV Martí? Please include not only employees, but also third parties who receive compensation as independent contractors.
28. How many of the individuals identified in response to (26) are employees, as opposed to independent contractors?
29. If any individuals included in your response to (26) are neither employees nor independent contractors, please provide the number of such individuals, and describe their relationship to you.
30. Please identify the individuals responsible for selecting hosts and guests for programs on Radio and TV Martí.

31. What factors influence whether a particular individual will be selected to act as a host or guest on shows on Radio and TV Martí?
32. Does ideology or political viewpoint play a role in the selection of hosts and guests on Radio and TV Martí?
33. Are all hosts and guests on Radio and TV Martí compensated?
34. If the answer to (33) is “No,” then what percentage of hosts and guests are compensated?
35. If the answer to (33) is “No,” then who determines whether a particular host or guest will be compensated, and how is that determination made?
36. Are all compensated hosts and guests on Radio and TV Martí compensated at the same rate?
37. If the answer to (36) is “No,” then who determines how a host or guest shall be compensated?
38. If the answer to (36) is “No,” then how is each guest’s compensation determined?
39. Approximately what percentage of Radio and TV Martí’s hosts and guests make positive statements about the ruling regime in Cuba while on the air?
40. To the best of your knowledge, how many people in the Miami area listen to Radio Martí or watch TV Martí?
41. To the best of your knowledge, how many people in Cuba listen to Radio Martí or watch TV Martí?
42. How many people listen to or watch programming on Radio and TV Martí through the Internet? Of those, how many are in the United States?
43. Are there any other means by which residents of the Miami area can access the programming on Radio and TV Martí (*e.g.*, rebroadcasts through other channels)? If so, please describe those means, and state, if you know, how many people utilize them.

**Interrogatories 44-47 relate to your relationship with the media in the United States generally.**

44. Since 1990, has the State Department ever paid government funds to any journalist working in the private media in the United States? If so:



- e. When were such payments made?
  - f. To whom were these payments made?
  - g. How much was paid?
  - h. What were the circumstances and purposes of these payments?
45. Have any State Department employees, while on the government's payroll, sought employment in the private media in the United States?
- i. If so, when did these employees seek such employment?
  - j. With whom did the government employees seek employment?
  - k. Did you play any role in arranging such employment?
46. Do you require employees and/or independent contractors to advise you or any other individual of outside income or employment?
47. If the answer to (46) is "Yes," then when and how have these disclosures been accomplished with regard to paid journalists in the United States and State Department employees who interact with paid journalists?

## **Proposed Document Requests**

### **Instructions**

1. The word “you” refers to the entire United States federal government, including, without limitation, the U.S. Department of Justice, the U.S. State Department, the U.S. Information Agency, the Broadcasting Board of Governors, the Office of Cuba Broadcasting, the stations Radio Martí and TV Martí, and the Federal Bureau of Investigation, as well as their employees.
2. The phrase “U.S. State Department” or “State Department” includes the U.S. Information Agency, the Broadcasting Board of Governors, the Office of Cuba Broadcasting, and the stations Radio Martí and TV Martí, as well as their employees.
3. The phrase “prosecution team” refers to all individuals at the U.S. Department of Justice who had a role in the prosecution of Movant and his co-defendants, as well as any law enforcement or other executive branch personnel who meaningfully contributed to the investigation and prosecution.
4. The phrase “this case” refers not only to this § 2255 proceeding, but also to the underlying criminal cases.
5. The phrase “the events of this case” refers to the alleged espionage activities of Movant and his co-defendants in this case (including those who pled guilty), to the shootdown of the Brothers to the Rescue aircraft in 1996, as well as to the subsequent investigation, arrests, prosecution, and judicial proceedings relating to those events.
6. The phrase “paid journalists” refers to any individual who accepted funds from the United States government and who also published or otherwise communicated messages, in any media outlet—including but not limited to print, television, radio, and publicly accessible websites—about the events of this case.

### **Document Request**

1. All communications, including correspondence, e-mail, and memoranda, between the prosecution team and the U.S. State Department relating to paid journalists.
2. All communications, including correspondence, e-mail, and memoranda, between the prosecution team and the U.S. State Department relating to the events of this case.
3. All communications, including correspondence, e-mail, and press releases, between the prosecution team and paid journalists relating to the events of this case.

4. All communications, including but not limited to correspondence and e-mail, from Cuban American members of the public and members of the prosecution team.
5. To date, numerous groups have pursued requests and litigation under the Freedom of Information Act (“FOIA”), seeking documents relevant to the events in this case. The requested documents relate to the use of government funds to compensate journalists who published stories designed to secure a conviction about Movant and his co-defendants before and during the judicial proceedings in this case. This FOIA effort has sometimes met with total noncompliance, and other times with patchy, incomplete responses. The materials relevant to those requests are attached as Exhibits A-E of the Affidavit of Martin Garbus, filed contemporaneously with this request. Those requests are hereby incorporated by reference. The specific requests include:
  - a. A request to the Broadcasting Board of Governors for all documents in the possession of the Broadcasting Board of Governors and the Office of Cuba Broadcasting regarding all grants, payments, and/or transfers to U.S. citizens, organizations and vendors, and Cuban citizens who are employed by U.S. media communication entities in television, newspaper, radio and Internet, as well as any and all records, including correspondence and contracts regarding the purpose of those grants, payments, and/or transfers from the Broadcasting Board of Governors and Office of Cuba Broadcasting to those individuals, organizations, and vendors. This request included all data, contracts, memoranda, letters, alerts, correspondence, applications, bulletins, e-mails, electronic postings, reports, notes, images, balance sheets, and other materials from January 1, 1996 to the present.
  - b. A request for any and all contracts in the possession of the Broadcasting Board of Governors and Office of Cuba Broadcasting, regarding all grants, payments and/or transfers from the Office of Cuba Broadcasting and/or the Broadcasting Board of Governors to any of the following individuals: Agustin Acosta; Rodrigo Alonzo; Carlos Barba Armando Alvarez Bravo; Liz Balmaseda; Vanessa Bauza; Guillermo Benites; Reinaldo Bragado Bretaia; Carlos Castaneda; Armando Correa; Cynthia Corzo; Paul Crespo; Vivian Crucet; EnaCumow; Elaine De Vaile; Julio Estorino; Roberto Fabricio; Tomas Garcia Fuste; Lisette Garcia Garcia; Manny Garcia; Mario Llerena; Marika Lynch; Javier Lyonnet; Luis Felipe Marsans; Lydia Martin; Ramon Mestre; Ruth Montaner; Daniel Morcate; Leonel Morejon Almagro; Alberto Muller; Olance Nogueras; Damarys Ocana; Casto Ocando; Sara Okon; Rafael Orizondo; David Ovalle; Jose Dante Parra Herrera; Enrique Patterson; Ivonne Perez; Sue Anne Pressley; Adam Ramirez; Gerardo Reyes; Jeanette Rivera-Lyles; Raul Rivero; Frances Robles; Jorge Jose

Rodriguez; Roberto Rodriguez-Tejera; Rafael Rojas; Ian Roman; Maria Elvira Salazar; Fabiola Santiago; Agustin Tamargo; Joaquin Utset; Andres Viglucci; Luisa Yanez; Jose Antonio Zarraluqui; and Patricia Zengerle. This includes all contracts from January 1, 1996 to the present.

- c. A request to the Broadcasting Board of Governors and the Office of Cuba Broadcasting for any and all other records including memoranda, letters, alerts, correspondence, applications, bulletins, e-mails, electronic postings, reports, notes, images, balance sheets or any other materials in the possession of the Broadcasting Board of Governors and Office of Cuba Broadcasting, regarding all grants, payments and/or transfers from the Office of Cuba Broadcasting and/or the Broadcasting Board of Governors to any of the following individuals: Agustin Acosta; Rodrigo Alonzo; Carlos Barba Armando Alvarez Bravo; Liz Balmaseda; Vanessa Bauza; Guillermo Benites; Reinaldo Bragado Bretaiia; Carlos Castaneda; Armando Correa; Cynthia Corzo; Paul Crespo; Vivian Cruet; EnaCumow; Elaine De Vaile; Julio Estorino; Roberto Fabricio; Tomas Garcia Fuste; Lisette Garcia Garcia; Manny Garcia; Mario Llerena; Marika Lynch; Javier Lyonnet; Luis Felipe Marsans; Lydia Martin; Ramon Mestre; Ruth Montaner; Daniel Morcate; Leonel Morejon Almagro; Alberto Muller; Olance Noguerras; Damarys Ocana; Casto Ocando; Sara Okon; Rafael Orizondo; David Ovalle; Jose Dante Parra Herrera; Enrique Patterson; Ivonne Perez; Sue Anne Pressley; Adam Ramirez; Gerardo Reyes; Jeanette Rivera-Lyles; Raul Rivero; Frances Robles; Jorge Jose Rodriguez; Roberto Rodriguez-Tejera; Rafael Rojas; Ian Roman; Maria Elvira Salazar; Fabiola Santiago; Agustin Tamargo; Joaquin Utset; Andres Viglucci; Luisa Yanez; Jose Antonio Zarraluqui; and Patricia Zengerle. This includes all records from January 1, 1996 to the present.
- d. A request from the *Liberation* newspaper for any and all contracts in the possession or control of the Broadcasting Board of Governors and its Office of Cuba Broadcasting regarding all grants, payments, purchase orders and/or obligations of funds to be transferred to the following journalists: Pablo Alfonso; Alejandro Armengol; Armando Bravo; Pablo Crespo; Ena Curnow; Julio Estorino; Daniel Morcate; Alberto Muller; Olance Noguerras; Enrique Patterson; Raul Rivero; and Jose Zarraluqui.
- e. A request from the *Liberation* newspaper to the U.S. State Department, including the U.S. Information Agency, the Broadcasting Board of Governors, and the Office of Cuba Broadcasting for all contracts in the possession or control of the Department of State regarding all grants, payments, purchase orders and/or obligations of funds to be transferred to the following individuals: Alberto

Hernandez; Alberto Muller; Alejandro Armengol; Alfonso Chardy; Ariel Ramos; Armando Perez Roura; Carlos Alberto Montaner; Casto Ocando; Damarys Ocana; Daniel Morcate; Diego Suarez; Elaine De Valle; Ena Curnow; Enrique Encinosa; Gail Epstein Nieves; Helen Aguirre Ferre; Javier Lyonnet; Juan Manuel Cao; Julio Estorino; Leonel Morejon Almagro; Lisette Garcia Garcia; Lourdes D'Kendall; Luis Felipe Marsans; Lydia Martin; Manny Garcia; Marika Lynch; Mario Llerena; Miguel Cossio; Ninoska Perez Castellon; Olance Noguerras; Olga Connor; Pablo Alfonso; Patricia Zengerle; Paul Crespo; Ramon Bonachea; Ramon Mestre; Raul Ferreira; Roberto Fabricio; Roberto Martin Perez; Roberto Martinez Sixto; Ruth Montaner; Tomas Garcia Fuste; Vivian Crucet; Wilfredo Cancio Isla.

6. Any and all records, including correspondence, regarding the purpose of those grants, payments and/or transfers from the agencies named above to those individuals, organizations and vendors, as well as any documents including curriculum vitae, and dates of hire with the relevant agency for each such individual, as well as information relating to the security clearances of the paid journalists.
7. Any document circulated to any individual employed by the U.S. State Department setting forth the U.S. State Department's (or any part thereof) views regarding the events of this case.
8. Recordings and transcripts of Radio and TV Martí program broadcasts, in which any of the above-referenced U.S. citizens and permanent residents and Cuban citizens appeared as guests or hosts, paid or unpaid; as well as recordings and transcripts of Radio and TV Martí program broadcasts and any other TV broadcasting or radio shows in which: any FBI personnel, including but not limited to Hector Pesquera, appeared; any U.S. Justice Department personnel, including but not limited to Guy Lewis, appeared in interviews or news reports of Radio and TV Martí ; between the dates of Jan. 1998 and Dec. 2005; all transcripts and audio and video recordings of Radio and TV Martí which mention "Wasp Network," "Red Avispa," Gerardo Hernández, Manuel Viramontez, Fernando González, Ruben Campa, Ramón Labañino, Luis Medina, Antonio Guerrero, René González, Juan Pablo Roque, "los cinco espías cubanos", Hermanos al Rescate, Brothers to the Rescue.
9. Recordings and transcripts of any programs relating to the events of this case, including but not limited to "A Mano Limpia," which included the theme of "Wasp Network," "Red Avispa," Gerardo Hernández, Manuel Viramontez, Fernando González, Ruben Campa, Ramón Labañino, Luis Medina, Antonio Guerrero, René González, Juan Pablo Roque, "los cinco espías cubanos," Hermanos al Rescate, Brothers to the Rescue.

10. Any report or other document establishing or estimating the number of people in Miami and the number of people in Cuba who watch or listen to TV Martí and Radio Martí.
11. To the extent not covered above, any document in the possession of the U.S. State Department that relates to the events of this case.

### **Proposed Third Party Subpoenas**

In addition to party discovery, Movant respectfully requests third party discovery in this matter as well. Subpoenas are necessary to fully develop the record in this case.

**1. Subpoenas to Journalists on the Government Payroll.** On information and belief, at least ten journalists— Pablo Alfonso, Wilfredo Cancio Isla, Enrique Encinosa, Julio Estorino, Helen Ferré, Alberto Müller, Ninoska Perez, Ariel Remos, Maria Elvira Salazar, and Oscar Haza—published inflammatory materials about Movant and his co-defendants designed to secure their convictions, and also received funds from the United States government. Movant requests subpoenas of these journalists in order to determine how much money they received in compensation from the federal government; whether the journalists were expected to aid in the attempt to obtain a conviction; whether the journalists were expected to communicate a particular viewpoint on the events of this case or on Cuba more generally; and other facets of the relationship between the journalists, the U.S. State Department, and the U.S. Department of Justice. Movant would also request documents, including any correspondence between these journalists and officials involved in this case, as well as contracts and other evidence that the reporters were employed by the U.S. government. Should discovery reveal additional journalists who are similarly situated, Movant might seek to subpoena those individuals as well. A non-exhaustive list of potential candidates for such subpoenas is appended to this request as Annex 1. Should discovery reveal that additional media organizations may have important information, Movant would seek to subpoena those organizations as well.

**2. Subpoenas to Media Organizations That Hired Government-Paid Journalists.** Movant respectfully requests the ability to subpoena *El Nuevo Herald*, as well as its parent *The Miami Herald*, and also to subpoena *Diario Las Américas*, as well as its publisher the Americas Publishing Company, to gather further information about the journalists at those organizations who received payments from the government and to expose more details about the relationship between the government and the Miami-area journalistic community. Movant also seeks documents relating to the *Miami Herald's* internal investigation of misconduct by reporters at *El Nuevo Herald*.

**3. Subpoenas to Media Organizations That Published Information About the Trial.** Movant also requests to subpoena, for the production of documents—specifically transcripts of relevant programming—the list of media organizations appended to this request as Annex 2. Movant seeks the transcripts of programs relating to the events of this case (or recordings, if transcripts are not available), as well as any information relating to the preparation of those programs. Movant also wishes to subpoena the relevant supervisors at these organizations to disclose their knowledge of whether journalists on staff were paid by the U.S. Government.

**ANNEX 1**

The following individuals are known or believed to be connected to the inflammatory press coverage relating to this case. Should the requested discovery reveal evidence of important ties between any of these individuals and the events of this case, Movant would request additional depositions of these individuals.

- |        |                            |          |                           |
|--------|----------------------------|----------|---------------------------|
| i.     | Acosta Agustin;            | xxii.    | De Kendall, Lourdes;      |
| ii.    | Alonso, Dalina M.;         | xxiii.   | De Valle, Elaine;         |
| iii.   | Alonzo, Rodrigo;           | xxiv.    | Fabricio, Roberto;        |
| iv.    | Alvarez Bravo, Armando;    | xxv.     | Ferreira, Rui;            |
| v.     | Amador Rodriguez Juan;     | xxvi.    | Flores Marta;             |
| vi.    | Armengol, Alejandro;       | xxvii.   | García, Manny;            |
| vii.   | Balmaseda, Liz;            | xxviii.  | García Fuste, Tomás;      |
| viii.  | Barba, Carlos;             | xxix.    | García García, Lisette;   |
| ix.    | Benites, Guillermo;        | xxx.     | Hernandez Amerosio;       |
| x.     | Bragado Bretaña, Reinaldo; | xxxi.    | Iriondo Silvia;           |
| xi.    | Calatayud, Tony;           | xxxii.   | Lew, Salvador;            |
| xii.   | Callava, Leticia;          | xxxiii.  | Llerena, Mario;           |
| xiii.  | Castañeda, Carlos;         | xxxiv.   | Lynch, Marika;            |
| xiv.   | Connor, Olga;              | xxxv.    | Lyonnet, Javier;          |
| xv.    | Correa, Armando;           | xxxvi.   | Marsans, Luis Felipe;     |
| xvi.   | Cortina, Humberto;         | xxxvii.  | Martin, Lydia;            |
| xvii.  | Cossio, Miguel;            | xxxviii. | Mestre, Ramón;            |
| xviii. | Corzo, Cynthia;            | xxxix.   | Montaner, Carlos Alberto; |
| xix.   | Crespo, Paul;              | xl.      | Montaner, Ruth;           |
| xx.    | Crucet, Vivian;            | xli.     | Morcate, Daniel;          |
| xxi.   | Curnow, Ena;               | xlii.    | Morejón Almagro, Leonel;  |



- |         |                            |         |                               |
|---------|----------------------------|---------|-------------------------------|
| xlili.  | Nogueras, Olance;          | lxviii. | Tamargo, Agustin;             |
| xliv.   | Ocana, Casto;              | lxix.   | Tamayo, Juan;                 |
| xlv.    | Okon, Sara;                | lxx.    | Zayon, Angel;                 |
| xlvi.   | Orizondo, Rafael;          | lxxi.   | Utset, Joaquin;               |
| xlvii.  | Ovalle, David;             | lxxii.  | Yañez, Luisa;                 |
| xlviii. | Parra Herrera, Jose Dante; | lxxiii. | Zarraluqui, José Antonio; and |
| xliv.   | Patterson, Enrique;        | lxxiv.  | Zengerle, Patricia.           |
| l.      | Pérez, Ivonne;             |         |                               |
| li.     | Perez Roura, Armando;      |         |                               |
| lii.    | Pressley, Sue Anne;        |         |                               |
| liii.   | Ramírez, Adam;             |         |                               |
| liv.    | Ramos, Jorge;              |         |                               |
| lv.     | Regalado Tomas;            |         |                               |
| lvi.    | Reyes, Gerardo;            |         |                               |
| lvii.   | Rivera, Raúl;              |         |                               |
| lviii.  | Robles, Frances;           |         |                               |
| lix.    | Rodriguez Fuste Tomas;     |         |                               |
| lx.     | Rodriguez Jorge José;      |         |                               |
| lxi.    | Rodriguez Tejera, Roberto; |         |                               |
| lxii.   | Rojas, Rafael;             |         |                               |
| lxiii.  | Román, Ian;                |         |                               |
| lxiv.   | Roque Cary (or Caridad);   |         |                               |
| lxv.    | Ruiz Labrit, Victoria;     |         |                               |
| lxvi.   | Santiago, Fabiola;         |         |                               |
| lxvii.  | Sanchez Maria Elena;       |         |                               |

## ANNEX 2

The following are media organizations that are believed to have relevant information, and that Movant seeks to subpoena.

A. TELEVISION stations:

- i. WGEN Ch. 8 (GenTV);
- ii. WSBS Ch. 22 (Mega TV);
- iii. WLTV Ch. 23 (Univisión);
- iv. WPMF Ch. 38 (Azteca America);
- v. WJAN Ch. 41 (America TV);
- vi. WSCV Ch. 51 (Telemundo); and
- vii. WAMI Ch. 69 (TeleFutura, Hollywood).

B. RADIO stations

- i. WACC - 830 AM - Radio Paz (Hialeah);
- ii. WAMR - 107.5 FM - Radio Amor (Miami);
- iii. WAQI - 710 AM - Radio Mambi (Miami);
- iv. WCMQ - 92.3 FM - Clasica 92.3 (Hialeah);
- v. WJCC - 1700 AM (Miami Springs);
- vi. WNMA - 1210 AM (Miami Springs);
- vii. WOCN - 1450 AM - Union Radio (Miami);
- viii. WOIR - 1430 AM (Homestead);
- ix. WQBA - 1140 AM (Miami);
- x. WRHC - 1550 AM - (Coral Gables);
- xi. WSUA - 1260 AM - (Miami) Spanish;
- xii. WWFE - 670 AM - La Poderosa (Miami); and
- xiii. WXDJ - 95.7 FM (Miami Beach) – Spanish.