

Central Intelligence Agency
Publications Review Board
Washington, D.C. 20505

Subject: Submission of Manuscript for Prepublication Review

Dear Members of the Publications Review Board,

I respectfully submit the enclosed manuscript for prepublication review pursuant to my obligations as a former Agency officer. I understand that the purpose of this review is to identify and prevent the disclosure of classified national security information. I submit the manuscript in good faith to facilitate that process, and I note at the outset that, to the best of my knowledge, the manuscript contains no classified information.

The manuscript references certain details concerning my prior service with the CIA. All such references are drawn from the public record. They were introduced and discussed openly during *Young v. Cable News Network, Inc.*, Case No. 03 2022 CA 000608, a defamation trial held in the Fourteenth Judicial Circuit of Florida. The trial was conducted over multiple days in January 2025. It was not conducted under the Classified Information Procedures Act. No party invoked classified information procedures. No government entity intervened, sought to seal any portion of the record, requested a protective order, or asked the court to restrict testimony, exhibits, broadcast coverage, or public access to the record. The proceedings were broadcast nationally by the Law and Crime Network and viewed by a substantial public audience. The testimony and exhibits referenced in this submission, including materials referencing my prior CIA service and my status as a former NOC, were admitted, displayed, or discussed in open court and became part of the public trial record. Following the trial, my prior CIA affiliation was also reported publicly in multiple national and international news articles concerning the verdict and the litigation.

The Agency had full advance notice that these matters would be addressed in litigation. On May 24, 2023, counsel for CNN formally contacted the CIA's Office of General Counsel under 32 C.F.R. § 1905.4, requesting confirmation of my prior employment and advising the Agency that CNN intended to pursue discovery concerning my alleged CIA positions, security clearances, alleged Agency projects, high risk missions, extractions, and evacuations. The Agency responded on June 28, 2023, through Assistant General Counsel Erin M. Alleman. The Agency declined CNN's Touhy request and refused to produce information. Although the Agency cited sources and methods, the Privacy Act, the CIA Act, and potential classification concerns as reasons for refusing CNN's request, it did not invoke classification in the litigation itself. It did not intervene. It did not seek sealing. It did not request a protective order. It did not ask the court to restrict deposition testimony, trial testimony, exhibits, broadcast coverage, or public access to the record. The matter then proceeded through discovery, deposition, and a full public trial without Agency intervention.

The trial record also establishes that my prior CIA affiliation was not merely incidentally mentioned by a private individual or inadvertently disclosed by an unauthorized outsider. It was

confirmed through the Agency's official press function. The documentary record, admitted as a trial exhibit and broadcast nationally, shows CNN correspondent Alex Marquardt formally tasking the Agency's Office of Public Affairs on October 29, 2021, stating: "FYI I asked Tammy if they can look into the other guy's claim that he's CIA." This was not a casual conversation. It was a directed request to the Agency's official press office to look into whether a named individual was connected to the CIA. Marquardt testified under oath at trial that Tammy Kupperman Thorp, who served as the CIA's Director of Public Affairs from 2021 to 2025, confirmed my Agency background and described the practice as a "steer," which he defined on the record as the Agency's established method of informally confirming information to credentialed journalists. This testimony is further corroborated by Marquardt's contemporaneous written communications stating that the Director of Public Affairs "just basically told me that dude was former CIA." These communications were entered as exhibits and displayed during the televised proceedings. The disclosure of my identity was accordingly the result of an official Public Affairs response to a media inquiry, provided by the Agency official responsible for press relations, and later confirmed through sworn testimony and contemporaneous communications in open court.

I note that the circumstances described above, including the nature of the inquiry made to the Office of Public Affairs, the identity of the official who provided the confirmation, and the Agency posture that produced the disclosure, do not appear anywhere in the submitted manuscript. That omission is deliberate. The manuscript references the existence of a "steer" only as it appears in the public trial record. It does not name the official. It does not describe internal Agency processes. It does not criticize or characterize the Agency's institutional conduct.

I recognize the sensitivity of that disclosure chain and have no interest in drawing unnecessary public attention to it. I reference it here solely to establish that the information regarding my Agency service has been disclosed through public judicial proceedings, sworn testimony, admitted or displayed trial exhibits, national broadcast coverage, and the Agency's official press function. I nonetheless submit the material for review consistent with my continuing obligations.

Beyond the limited biographical references to my Agency service, the manuscript contains no operational detail, no identification of intelligence methods or sources, no internal organizational structure, and no nonpublic information concerning Agency activities. All names, dates, locations, and identifying operational details have been altered. All references to my CIA service are drawn directly from the public trial record and the sources identified in the attached bibliography.

To be clear, the manuscript does not attempt to reconstruct classified events, describe operational activities, identify sources or methods, or rely on any nonpublic Agency information. Where the manuscript uses fictionalized narrative elements, those elements have been altered to avoid identifying actual people, dates, locations, or operational circumstances. The purpose of this submission is not to test the limits of classification review, but to ensure that the Board has the opportunity to review a manuscript that relies only on public sources, public court proceedings, and fictionalized material.

I submit this material in good faith and respectfully request the Board's review. Thank you for your time and consideration.

Respectfully,

Zachary S. Young

Vienna, Austria

Attachment Index

PRB Submission of Manuscript by Zachary S. Young

Exhibit A — CNN Counsel Letter to CIA (May 24, 2023)

Formal correspondence from CNN counsel Allison S. Lovelady (Shullman Fugate PLLC) to the CIA Office of General Counsel, requesting confirmation of Mr. Young's CIA employment under 32 C.F.R. §1905.4.

Exhibit B — CIA Office of General Counsel Response (June 28, 2023)

Letter from Assistant General Counsel Erin M. Alleman declining CNN's Touhy request under 32 C.F.R. Part 1905. The letter refused production in response to CNN's request but did not seek court intervention, sealing, a protective order, or any restriction on the public litigation record.

Exhibit C — Trial Exhibit: LinkedIn Message Referencing Agency Background (Law and Crime Network Broadcast)

Screenshot from televised trial proceedings showing a LinkedIn message identifying Mr. Young as a former Agency case officer, admitted as a court exhibit and broadcast nationally.

Exhibit D — Trial Transcript: Deposition Testimony Identifying CIA Director of Public Affairs Tammy Kupperman Thorp

Transcript excerpt from trial proceedings in which CNN correspondent Alex Marquardt identifies Tammy Kupperman Thorp as the CIA's Director of Public Affairs and testifies regarding her confirmation of Mr. Young's Agency affiliation. Includes testimony defining the Agency's practice of providing informal confirmations to credentialed journalists.

Exhibit E — Contemporaneous Written Communications Corroborating CIA Spokesperson Disclosure

Screenshot from televised trial proceedings showing internal CNN messages from Alex Marquardt stating that the CIA's Director of Public Affairs confirmed Mr. Young's former CIA status. Entered as a court exhibit and broadcast nationally.

Exhibit F — CNN Pre-Broadcast Correspondence with Mr. Young

Screenshot from televised trial proceedings showing CNN's questions to Mr. Young prior to broadcast, including direct inquiries regarding his CIA relationship and NOC status. Entered as a court exhibit and broadcast nationally.

Exhibit G — Enlarged Deposition Transcript: CIA Spokesperson Confirmation Testimony

Enlarged excerpt of deposition transcript (Page 148) detailing Marquardt's testimony regarding the CIA "steer" practice and the role of Tammy Kupperman Thorp, Director of Public Affairs, in confirming Mr. Young's Agency background.

Note: All attached materials were admitted or discussed in open court during *Young v. CNN* and publicly released through official broadcasts. They are provided solely to verify the public provenance of references within the submitted manuscript.

**Central Intelligence Agency
Publications Review Board Submission
Bibliography of Publicly Available Sources
Author: Zachary S. Young**

Court Records and Public Proceedings

Young v. Cable News Network, Inc., Case No. 03-2022-CA-000608 (Fla. 14th Jud. Cir.).
Trial proceedings broadcast by Law and Crime Network, January 2025. Public transcript and exhibits on file with the Bay County Clerk of Court.

Official Government Correspondence

Letter from CNN Counsel Allison S. Lovelady (Shullman Fugate PLLC) to CIA OGC, May 24 2023.
Response from CIA OGC, Erin M. Alleman, June 28, 2023, declining CNN's Touhy request under 32 C.F.R. Part 1905.

Broadcast and Media Coverage

Reuters — “CNN found liable for defaming US Navy veteran who helped people evacuate Afghanistan” — January 17 2025
Los Angeles Times — “Jury finds CNN defamed security consultant in Afghanistan evacuation report” — January 16 2025 (updated January 17 2025) (Public article describing Mr. Young as a former CIA operative and reporting on the public jury verdict.)
The Hollywood Reporter — “CNN Loses Defamation Trial Over Afghan Evacuation Report” — January 17 2025
Variety — “CNN Ordered to Pay \$5 Million for Defaming Contractor in Afghanistan Evacuation Report” — January 17 2025
The Washington Post — “CNN reporter defends Afghanistan story that led to defamation trial” — January 13 2025
Bloomberg Law — “CNN Hit With \$5 Million Defamation Verdict in Florida Court” — January 17 2025
The Wall Street Journal — “CNN's Reporting Tactics on Display as Defamation Trial Heads to Jury” — January 16 2025 (appeared in Jan 18 print as “CNN Loses Defamation Suit Filed by Security Consultant”)
Al Jazeera — “CNN found guilty for defaming US Navy veteran evacuating Afghans for a fee” — January 17 2025
Courthouse News Service — “Journalist defends reporting that led to CNN defamation lawsuit” — January 13 2025

Court TV — “CNN Defamation Trial: Zachary Young & Nemex Enterprises Inc. v. CNN” — January 17 2025
Panama City News Herald — “Bay County jury finds that CNN defamed ex-U.S. operative” — January 17 2025
The Guardian — “CNN defamation case foreshadows Trump media crackdown, experts say” — January 20 2025
Law & Crime Network — “Young v. CNN — Full Trial Coverage (Pool Feed and Verdict)” — January 8–17 2025

Public Regulations and Policy References

32 C.F.R. Part 1905 – Production of Official Information in Proceedings to Which the CIA Is Not a Party.
Executive Order 13526 – Classified National Security Information.
CIA Publications Review Board Guidelines (public).
5 U.S.C. § 552a – Privacy Act of 1974.
50 U.S.C. § 3507 – Central Intelligence Agency Act of 1949 (as amended).

Open-Source Works on Intelligence and Tradecraft

Antonio J. Mendez, *The Master of Disguise* (HarperCollins, 1999).
Robert Baer, *See No Evil* (Crown, 2002).
Valerie Plame Wilson, *Fair Game* (Simon & Schuster, 2007).
Henry A. Crumpton, *The Art of Intelligence* (Penguin Press, 2012).
John Rizzo, *Company Man* (Scribner, 2014).
Lindsay Moran, *Blowing My Cover* (G.P. Putnam’s Sons, 2005).
Ishmael Jones, *The Human Factor* (Encounter Books, 2008).

Additional Open-Source References on the CIA NOC Program and Deep Cover Operations

Democracy Now, “*The NOC Program: A Look at Valerie Plame’s ‘Nonofficial Cover’ (NOC)*” (July 19 2005).
(*Provides early public discussion of the CIA NOC program and the concept of nonofficial cover, establishing long-standing public recognition of the term.*)

Sasha Ingber, “*Handling the CIA’s Most Off the Grid Spies with Jim Lawler*” (Substack, 2023).
(*First-person public account by a former CIA case officer who handled NOCs, describing deep-cover work in unclassified terms.*)

Yahoo News, “*Shattered: Inside the Secret Battle to Save America’s Undercover Spies in the Digital Age*” (December 30 2019).

(Mainstream reporting on modern challenges faced by NOCs, demonstrating that the existence and function of the program are openly discussed in media.)

U.S. Senate Select Committee on Intelligence, *Open Hearing: Director John O. Brennan, CIA* (June 9 2016).

(Public congressional testimony about CIA clandestine operations and oversight, providing unclassified context for covert personnel structures.)

Congressional Research Service, “*Intelligence Issues for Congress*” (April 23 2013).

(Unclassified CRS report summarizing covert and clandestine frameworks relevant to NOC-type assignments and CIA authorities.)

Open-Source Works on Government and Security Training

U.S. Department of Defense, *Joint Publication 3-07.2: Antiterrorism* (unclassified public version, 2010).

U.S. Department of State, Bureau of Diplomatic Security, *Overseas Security Advisory Council (OSAC) Security Awareness Materials* (public).

U.S. Army Field Manual FM 3-19.30, *Physical Security* (unclassified, 2001).

U.S. Army Field Manual FM 3-24, *Counterinsurgency* (unclassified, 2006).

U.S. Department of Defense, *Joint Publication 3-10, Joint Security Operations* (unclassified, 2019).

Gavin de Becker, *The Gift of Fear* (Dell, 1997).

Fred Burton and Samuel M. Katz, *Under Fire: The Untold Story of the Attack in Benghazi* (St. Martin’s Press, 2013).

Other Sources

Iran Watch. “Islamic Republic of Iran Shipping Lines (IRISL).” *Iran Watch*, June 26 2020. <https://www.iranwatch.org/iranian-entities/islamic-republic-iran-shipping-lines-irisl> (Provides open-source reporting on the Islamic Republic of Iran Shipping Lines (IRISL), the Islamic Revolutionary Guard Corps (IRGC), the Quds Force, and documented interdictions of Iranian-linked vessels—context used in the manuscript’s discussion of maritime sanctions enforcement and proliferation-related activity.)

Statement of Scope

All materials listed above are unclassified, publicly available, and accessible through open publication or official government sources. No restricted, internal, or classified manuals were consulted. This bibliography is provided solely to establish the open-source provenance of the general concepts and historical context referenced in the manuscript.

EXHIBIT A



2101 Vista Parkway, Suite 4006, West Palm Beach, Florida 33411 • 561.614.2592

May 24, 2023

VIA OVERNIGHT MAIL

Central Intelligence Agency
Office of General Counsel
Chief of Litigation, Litigation Division
Washington, D.C. 20505

Re: Demand for Information Pursuant to 32 C.F.R. §1905.4

Dear Litigation Chief:

This is a formal request pursuant to 32 C.F.R. §1905.4 for confirmation of employment and dates of employment for Zachary Scott Young (d.o.b. 10/16/1976). Mr. Young is currently the Plaintiff in a defamation lawsuit pending in the Fourteenth Judicial Circuit in and for Bay County, Florida. *See Young v. Cable News Network, Inc.*, No. 03-2022-CA-000608 (Fla. 14th Cir. Ct.). Our office represents the Defendant, Cable News Network (“CNN”), in this matter. Mr. Young claims that due to CNN’s allegedly defamatory reporting, he has been foreclosed from career opportunities. Mr. Young holds himself out to be former Agency and a security consultant who provided evacuation services from Afghanistan in Fall 2021. *The Amended Complaint is attached hereto.*

We are seeking confirmation of Mr. Young’s employment with the CIA for several reasons. First, Mr. Young claims in this lawsuit that he was “recruited by a U.S. government agency,” which required a security clearance, and endured “rigorous tests of honesty, integrity, and loyalty.” *Amended Complaint pg. 2-3.* He also alleges that he “belongs to a small and elite community of former U.S. national security professionals,” and has maintained “a government security clearance for most of his adult life.” *Id.* Throughout the pendency of this litigation, Mr. Young and his attorney have stated that this “U.S. government agency” where Mr. Young was employed is, in fact, the CIA. He has also represented to other third-party individuals on social media that he is “former Agency” and suggested an affiliation with the CIA. *See Screenshot attached hereto.*

We are currently scheduling Mr. Young’s deposition, which we anticipate will take place in the next few months. At that deposition, Mr. Young’s government positions and related experience are relevant topics of inquiry due to Mr. Young’s allegations and activity online. To that end, we will inquire about his claims regarding his purported CIA positions, alleged “unique skill set” and various security clearances. We will also explore his alleged experience in Agency projects, “high risk missions,” and extractions and/or evacuations in the United States and abroad.

CIA Office of General Counsel

May 24, 2023

Page 2 of 2

Prior to the deposition, we are attempting to establish the veracity of Mr. Young's claims related to his involvement with this Agency. At this time, we are only seeking confirmation of employment and dates of employment for Mr. Young, if available.

Please let our office know if we can provide any additional information or clarification to assist in the evaluation or disclosure of this information. Thank you for your assistance.

Sincerely,

Shullman Fugate PLLC

A handwritten signature in black ink that reads "Allison Lovelady". The signature is written in a cursive style with a large, looping initial "A".

Allison S. Lovelady

alovelady@shullmanfugate.com

EXHIBIT B

CENTRAL INTELLIGENCE AGENCY

WASHINGTON, D.C. 20505

Office of General Counsel

June 28, 2023

VIA CERTIFIED MAIL

Allison S. Lovelady
Shullman Fugate PLLC
2101 Vista Parkway, Suite 4006
West Palm Beach, FL 33411

Re: *Young, et al. v. Cable News Network, Inc.*, No. 03-2022-CA-000608 (Fla. 14th Cir. Ct.)

Dear Ms. Lovelady:

This letter is in response to your May 24, 2023, letter seeking “confirmation of employment and dates of employment for Zachary Scott Young (d.o.b. 10/16/1976).” For the following reasons, the Central Intelligence Agency (“CIA”) objects to your request in its entirety.

The CIA has construed your letter as a request for information under *United States ex rel. Touhy v. Ragen*, 340 U.S. 462 (1951), pursuant to which the CIA may, but is not required to, produce materials for use in litigation to which the United States is not a party. The CIA’s *Touhy* regulation provides the substantive and procedural framework under which your request was evaluated, and is published at 32 C.F.R. Part 1905.

Pursuant to that regulation, the CIA reviews requests like yours to determine “whether any information or materials may properly be produced in response.” 32 C.F.R. § 1905.4(b). In doing so, the Agency considers, among other things, whether any of the following circumstances apply:

- (i) Disclosure would violate a statute, including, but not limited to the Privacy Act of 1974, as amended, 5 U.S.C. 552a;
- (ii) Disclosure would be inconsistent with the statutory responsibility of the Director of Central Intelligence to protect intelligence sources and methods;
- (iii) Disclosure would violate a specific CIA regulation or directive;
- (iv) Disclosure would reveal classified information;
- (v) Disclosure would improperly reveal trade secrets or proprietary confidential information without the owner’s consent; or
- (vi) Disclosure would unduly interfere with the orderly conduct of CIA’s functions.

Id. § 1905.4(c)(3)(i)-(vi).

Several of these considerations weigh against the CIA’s production of the information you have requested. *First*, responding to your request by acknowledging the existence or nonexistence

of responsive records “would be inconsistent with the statutory responsibility of the Director of Central Intelligence to protect intelligence sources and methods” and almost certainly “would reveal classified information.” 32 C.F.R. § 1905.4(c); *see* 50 U.S.C. § 3024(i)(1).

Second, producing Mr. Young’s Agency personnel records, to the extent any such records exist, without his consent would violate the Privacy Act of 1974, 5 U.S.C. § 552a, which generally prohibits the disclosure of records maintained by federal agencies that are retrieved by the name or other unique identifier of a particular individual. *See id.* § 552a(b). Similarly, Section 6 of the Central Intelligence Agency Act of 1949, as amended, 50 U.S.C. § 3507, exempts from disclosure “the organization, functions, [and] names” of personnel employed by CIA.

Finally, locating, reviewing, and producing CIA holdings, should any such records exist, would unduly interfere with the orderly pursuit of the CIA’s mission by diverting Agency personnel from their official duties and placing additional, unnecessary strain on the Agency’s limited resources, and entangling the CIA in this private dispute. 32 C.F.R. § 1905.4(c)(3)(vi). *See COMSAT Corp. v. National Science Foundation*, 190 F.3d 269, 278 (4th Cir. 1999) (observing that “[w]hen an agency is not a party to an action, its choice of whether or not to comply with a third-party subpoena is essentially a policy decision about the best use of the agency’s resources,” subject only to the requirement that the agency comply with its own “*Touhy* regulations.”).

Consistent with the discretion afforded by its *Touhy* regulation, the CIA accordingly declines your request of May 24, 2023, and does not intend to produce information in response to it. *See* 34 C.F.R. § 1905.4(b) (“CIA may, in its sole discretion, decline to begin any search for information responsive to [a] demand” until objections and claims of privilege raised by the Office of General Counsel have been resolved.). The CIA further reserves all rights, claims, defenses, and objections that may be available to it in this matter, regardless of whether they are discussed in this letter.

Sincerely,



Erin M. Alleman
Assistant General Counsel

EXHIBIT C



D082

LinkedIn Member

AUG 20



LinkedIn Member · 1:44 pm

Hi Jill, nice to meet you. I'm a former Agency C/O with strong connections in Afgh. Let me know if you know anyone who needs assistance with overland evac into Peshawar. For many, it's a better option than the airport, especially if they are truly in harms way.

If the content in this message is unwanted or harmful, please report it to us. We won't notify the sender.

LIVE NOW

CNN DEFAMATION TRIAL – ZACHARY YOUNG V. CNN

12:52 PM CT

LAW & CRIME

FLORIDA-BASED CORPORATION NEMEX ENTERPRISES. HIS CLAIMS SUE CNN FOR DEFAMATION PER SE, DEFAMATION BY IMPLICATION, GROUP L



EXHIBIT D

- 1 A. No. As far as I knew he was -- he was
2 charging -- sorry to interrupt.
3 As far as I knew, he was simply asking for
4 large amounts of money to get Afghans out of the
5 country.
6 Q. You found no evidence of Mr. Young
7 committing a crime, correct?
8 A. No.
9 Q. Can you go to the last email on the -- I
10 guess it's the first email but it's the last in
11 chronological order.
12 A. Yeah, at the top.
13 Q. Okay. So that final sentence in the
14 email: "FYI, I asked Tammy if they can look into the
15 other guy's claim that he's CIA."
16 Do you see that?
17 A. I do.
18 Q. The other guy is Mr. Young, correct?
19 A. Yes.
20 Q. Who is Tammy?
21 A. Tammy is a source.
22 Q. Tammy is a -- is Tammy -- does Tammy work

- 1 for the CIA?
2 A. She does.
3 Q. What is Tammy's title at the CIA?
4 MS. SHULLMAN: Object to the form.
5 A. Spokesperson.
6 BY MR. FREEDMAN:
7 Q. Do you know what Tammy's last name is?
8 A. Thorp.
9 Q. And how did you eventually get in touch
10 with Tammy?
11 A. I cover national security. I talk to her
12 on a very regular basis.
13 Q. You and Tammy are close?
14 A. We're colleagues. She's a spokesperson.
15 I need to talk to her on a regular basis.
16 Q. Professionally, you and Tammy have a good
17 relationship, correct?
18 A. Yes, we do.
19 Q. And you call Tammy to ask if Zachary Young
20 was formally associated with the CIA, correct?
21 A. Yes, as he claimed -- or -- well, current,
22 former, what the association was.

- 1 Q. What did she say?
2 A. The conversation was off the record, which
3 means that I can't use it for my reporting. And she
4 gave some vague indication that he had some
5 connection at some point with the CIA.
6 Q. Do you recall what her exact words were?
7 A. No, I don't.
8 Q. Is it fair to say that you left the call
9 with Tammy understanding that she had off the record
10 in a way you can't use it giving you a wink-wink,
11 nod-nod, yes, this man had a connection to the CIA?
12 MS. SHULLMAN: Object to the form.
13 A. Yes. And it's called -- we call it a
14 steer, and it's pretty common with the CIA because
15 they're the CIA.
16 BY MR. FREEDMAN:
17 Q. Okay. Now my curiosity has just gotten
18 the better of me. What is a steer?
19 A. It's exactly what you said. A wink-wink,
20 nod-nod. It's a -- you're not wrong.
21 Q. Okay. Something along the lines of you're
22 not wrong, but I'm not telling you yes?

- 1 A. They're not going to confirm. They're not
2 going to give details. It's cagey.
3 Q. Did you find that fishy that she wouldn't
4 confirm?
5 A. No. It happens all the time with them.
6 Q. Did you find it shady that she wouldn't
7 confirm?
8 A. No.
9 Q. Standard -- standard practice for the CIA
10 to be -- to obfuscate over what it does, who it's
11 affiliated with, and its prior actions, correct?
12 A. Absolutely.
13 Q. Once you -- once you got that steer from
14 the CIA from Tammy, that -- did that remove some of
15 the shadiness from Mr. Young and his lack of desire
16 to answer questions?
17 MS. SHULLMAN: Object to the form.
18 A. No, it didn't.
19 BY MR. FREEDMAN:
20 Q. Why not? Why wouldn't you just assume
21 that as a former CIA affiliated individual he's like
22 the CIA going to be careful about what he says?

EXHIBIT E



Personal messages Alex Marquardt and Michael Callahan - 2021-11-01 (UTC)

- Michael Callahan (WSLM4GWS2)MC

Bass greenlit Afghan S

11/1/2021, 6:32 PM

- Alex Marquardt (WS89D50GZ)AM

Excellent!

11/1/2021, 6:32 PM

Tammy just basically told me that dude was former CIA

11/1/2021, 6:32 PM

otr

11/1/2021, 6:32 PM

I have two main characters I want to get on tape - the guy in Sacramento trying to get his family out and a guy in Kabul desperate to do the same. Then I want to try to find this Young character.

11/1/2021, 6:35 PM

As you've said, anyone who has paid it and gotten out would be good.

11/1/2021, 6:35 PM

LIVE NOW

10:59 AM CT

CNN DEFAMATION TRIAL – ZACHARY YOUNG V. CNN

2:43:06 / 8:48:19

PRIZES: 1.43:06 / 8:48:19 FOR DEFAMATION PER SE, DEFAMATION BY IMPLICATION, GROUP LIBEL AND TRADE MARK, CLAIMING THE



EXHIBIT F



I need your answers at the latest by 2pmET, so in two hours.

- Can you please break down the extremely high prices for evacuations you are asking? I have seen your conversations with others, charging \$75k for a car to Peshawer, \$14.5k for a flight to UAE, another \$4k to get to Albania. Others involved in evacuations have said your prices are too high.

- Are you making money off of this? If so, how do you justify profiting from Afghans desperate to get out?

■ We intend to show a conversation with Jill Kornetsky in which you tell her to "fuck off" (after calling her a "spiteful bitch"). Would you like to comment on that exchange?

- What is your relationship with the CIA? You told one person you were a former case officer, you told another you are a current NOC.

LIVE NOW

CNN DEFAMATION TRIAL – ZACHARY YOUNG V. CNN

3:10 PM CT



6:54:33 / 8:48:19

IN AFGHANISTAN: "THEir SECURITY CONSULTANT WERE DISTORTED BY "LIES PUBLISHED FOR SENSATIONALISM." CHARLIE YOUNG



LIVE: CNN Defamation Trial – Zachary Young v. CNN – Day Five



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444



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Thanks



EXHIBIT G

1 Q. What did she say?

2 A. The conversation was off the record, which
3 means that I can't use it for my reporting. And she
4 gave some vague indication that he had some
5 connection at some point with the CIA.

6 Q. Do you recall what her exact words were?

7 A. No, I don't.

8 Q. Is it fair to say that you left the call
9 with Tammy understanding that she had off the record
10 in a way you can't use it giving you a wink-wink,
11 nod-nod, yes, this man had a connection to the CIA?

12 MS. SHULLMAN: Object to the form.

13 A. Yes. And it's called -- we call it a
14 steer, and it's pretty common with the CIA because
15 they're the CIA.

16 BY MR. FREEDMAN:

17 Q. Okay. Now my curiosity has just gotten
18 the better of me. What is a steer?

19 A. It's exactly what you said. A wink-wink,
20 nod-nod. It's a -- you're not wrong.