Q (By Ms. McGinn) Mr. Parry, you said that you were told by Mr. Walsh that the Intelligence community couldn't accept the CIA numbers now, this is in October of 1967, and you have to back off. What did you mean by that?

A Would you please go back and read her my answers?

THE REPORTER: Starting where?

THE WITNESS: I want the one she's mischaracterizing.

MS. McGINN: I believe you characterized it that way.

(Record read.)

THE WITNESS: Do you want to apologize now?

Q (By Ms. McGinn) Do I want to apologize?

A Yes.

Q I wasn't referring to that answer.

A I never said Walsh came back and told me that. I said Smith. It was similar to your mischaracterization yesterday.

Q That was not the question that I was referring to.

Mr. Parry, the answer that I was referring to.

Mr. Parry, what do you mean when you say that the NIE would be published with the MACV numbers?

A That's what I was told, that the CIA would sign off on the NIE and that the NIE would include the numbers which MACV had decided on.

Q Who prepares the NIE?

A The National Intelligence community.

Q Who's responsible for the NIE?
A The National Intelligence community.

Q Who signs the NIE before it's final distribution?

A Director of Central Intelligence, who is the chairman of the National Intelligence community.

Q Does that represent the opinion of the National Intelligence community?

A It is supposed to.

Q Mr. Parry, why did you think those were MACV's numbers?

A Because those were the numbers which MACV was pushing all along. Those were the numbers that MACV represented at the Saigon Conference and in all of my conversations with anyone, it was these numbers are MACV's, these numbers are CIA's. It was a dispute between CIA and MACV.

Q Were you at the Saigon Conference?

A No, I was not.

Q So that you were told that these were MACV numbers by people in conversation?

A I was told, and my recollection is that I saw documents that showed--

Q Do you recall what documents you saw?

A I can't recall if it was a chart showing the difference between the CIA and the MACV position, I can't recall whether it was a paper that was drafted by someone at CIA reporting--I just really can't recall.

Q When we were discussing Mr. Curver earlier, Mr. Parry,
I believe you said he had switched his positions at some point in October about the inclusion of the Self-Defense militia and the Order of Battle, is that correct?

A Yes, I recall that testimony.

Q And I believe that you also said that he switched his position again at some time in the spring of 1968, is that correct?

A If I said that, I was wrong. I don't recall of any--George Carver switching in the spring of '68. If I said it, I was just wrong.

Q Can you explain to me what George Carver's position was with respect to the inclusion of the Self-Defense militia in the military Order of Battle in the spring of 1968?

A No, I can't. I can tell you only what the position of certain individuals out of SAVA was. I don't even know if George Carver was there in the spring of '68 at the OB Conference; I don't know.

Q Was there a position taken by the CIA with respect to the inclusion of the Self-Defense militia in the military OB at the 1968 military OB Conference?

A Yes.

Q What was that position?

A That it should be included at a strength of 100,000.

Q Who presented that position?

A George Allen.
Q. Was Mr. Allen working for SAVA at that point?
A. As far as I know.
Q. Was Mr. Allen representing the opinions of SAVA at that point?
A. If SAVA's opinions concurred with the CIA's position, yes. He was representing the CIA at that conference.
Q. If SAVA's position with respect to--by SAVA, I mean the Special Assistant for Vietnamese Affairs, who was George Carver--if SAVA's position with respect to the inclusion of the Self-Defense militia in the military Order of Battle were not consistent with CIA's position taken at the OB Conference in April, 1968, do you think you would have known about it?
A. Yes, I would have.

MR. MASTRO: Objection to form. Please slow down on your answers so that I have a chance to object to the form of Ms. McGinn's questions.

THE WITNESS: I knew that all of the analysts working on the militia OB at SAVA agreed that the Self-Defense militia and Secret Self-Defense should be included in an Order of Battle.
Q. (By Ms. McGinn) And you do not know whether the Special Assistant for Vietnamese Affairs, Mr. Carver, had taken a position that was different from the position taken by his analysts at SAVA?
A. I don't think I ever talked to George Carver concerning that matter. I don't recall that anyone reported it to me, but...
if he was director of SAVA, he disagreed with one of his analysts and he could have certainly said, "They're not going to present that paper."

MS. McGINN: Stop just a second. Off the record. (Whereupon, an off the record discussion was had.)

MR. MASTRO: Back on the record. Before we continue the cross-examination, there was one other transcription correction that I wanted to make that I had failed to make earlier. On Page 168 of yesterday's transcript, line 20, I asked Mr. Parry the question: "What kind of research were you doing?" This was in reference to what kind of research Sam Adams and Parry were doing at their respective positions in the Central Intelligence Agency. The transcript now reads for the answer, "On regular force strength. Army regular force strength."

Mr. Parry, do you recall whether that was an accurate transcription of what you said?

THE WITNESS: No. I said irregular.

MR. MASTRO: In both instances?

THE WITNESS: Yes.

MR. MASTRO: So it should read for line 21, "Answer: Irregular force strength. Army irregular force strength. There may have been overlap, but I didn't really get involved." So just on regular changes to irregular.

THE WITNESS: Let me look at that.
Q. (By Ms. McGinn) Do you concur in that change in the
record, Mr. Parry?

A. Yes. The research was on the irregular.

MR. MASTRO: We have now concurred on all
transcription changes that you suggested this morning and that
I suggested this morning?

MS. McGINN: That is correct, and there will be more.

Q. (By Ms. McGinn) Mr. Parry, yesterday you told us that
you had done a study on recruitment during the fall of 1967?

A. I had done a study.

Q. And there seems to be some confusion which I would
like to clear up about what that recruitment study entailed. I
believe you testified that you had estimated or that you had
estimates of recruitment of 7,000 to 7,500 in the fall of 1967,
is that correct?

A. That's correct.

MR. MASTRO: Could you please refer him to where in the
record this is?

Q. (By Ms. McGinn) Do you know the page?

A. It's approximately 181, isn't it?

MR. MASTRO: Yes, it is.

Q. (By Ms. McGinn) Mr. Parry, on Page 181 of your
testimony--

MR. MASTRO: I'll give him a copy.

Q. (By Ms. McGinn) --yesterday, you stated that, "Recruit
ment reached 7,500 a month into the guerilla ranks during that time period?"

A: That's correct, that's what I said.

Q: Would you like to correct that statement?

A: Yes. What I meant to say or what I wanted to say, because what the study showed was that recruitment during that period reached approximately 175 a month and—

MR. MASTRO: No. No.

THE WITNESS: Excuse me, 7,500 a month, I was correcting the wrong number. Let me start over again. In reading back over this, I realized that what was written, transcribed, or what I said was misleadingly incorrect. The answer to your question should be that during the time period of September—October through January of 1967-68, recruitment reached a level of approximately 7,500 per month, and this was the manpower which went into the VC Main force units and the Village and Hamlet Guerilla units.

Q (By Ms. McGinn) Mr. Parry, did you have an estimate for that time frame as to what the rate of recruitment was into the guerilla ranks?

A: Only in order of magnitude.

Q: Can you give me that order of magnitude?

A: Most of the recruits went into the guerilla units initially. There was more upgrading than there was direct recruitment into the Main force units.
Q. Why would there be more recruiting into the guerilla ranks rather than into the ranks of any of the other categories?

A. Well, based on my understanding as to the mentality and organization of the VC, based on the documents which I read, the Village and Hamlet Guerilla units not only had their specific military functions, but they also were a training ground for higher force units. Therefore, you could take an individual who had no military training into a guerilla unit, get him some experience, and then move him after he was experienced up to the Main force units. Those were manpower pools and training units, on-the-job training type of units.

MR. MASTRO: Can I make one other clarification here?

MS. McGINN: Off the record.

(Whereupon, an off the record discussion was had.)

MR. MASTRO: I want to clarify on the record that on Pages 192 and 193 of the transcript questions were asked about Mr. Parry’s estimates of recruitment of guerillas during the period of September, ’67 to the end of January, ’68. He responded to those questions and we now understand that he was referring to total enemy recruitment during this period, not simply to recruitment of guerillas, although he has also testified that guerilla recruitment consisted of a large part of this 7,000 to 7,500.

MS. McGINN: I don't think you need to go any further. He just testified to that.
MR. MASTRO: I just want to clarify. So at Pages 192 and 193, questions that asked about recruitment of guerrillas, that Mr. Parry answered, he intended to give estimates for total enemy recruitment. Is that your understanding as well on those pages?

MS. McGINN: Before I give you my understanding, I'm going to have to review what your understanding was, so I think I would be advised to give it at the next session of this deposition.

Q (By Ms. McGinn) Mr. Parry, who supplied you with a copy of yesterday's transcript?

A No one did. It was here. I guess you would say my secretary. She was making copies of it.

Q When was this?

A I stayed here last night and worked on my profession and did some legal research, and people were here getting the daily copies for you. A copy was made. I picked it up to read through it.

MR. MASTRO: There's nothing improper about him having a copy. I made one available to him so that he could review it.

Q (By Ms. McGinn) Can I, please--

A Let me--whatever I read, was not anything that you made available to me. There was a copy here. I read it. I mean, I didn't read the whole thing. I just thumbed through it, read different pages.
Q You did not read the entire transcript?
A No, I did not.
Q Did you see the transcript of Wednesday's proceedings?
A Yes. Oh, yes.
Q Did you receive a copy of that transcript?
A There was a copy here in the office.
Q When did you receive that copy?
A I don't really think that "receive" is the proper word, but a copy has been here in the office ever since they were made. We're making the copies for you.
Q When did you first see a copy of your Wednesday testimony?
A Tuesday morning when you people walked in with a copy. Excuse me, Thursday morning when you walked in with a copy.
Q Did you thumb through your deposition testimony of Wednesday on Thursday morning?
A No.
Q Did you look at your deposition testimony of Wednesday on Thursday morning?
A On Thursday morning?
Q Yes.
A No. The only time I've looked at the deposition was last night about eight o'clock when I was here working and got bored with DOE problems.
Q Mr. Parry, how many times have you spoken to Sam Adams since he left the CIA?
A Since he left the CIA?
Q Since you left the CIA.
A Since I left the CIA?
Q Yes.
A I assume you're going to ask me all of these and it will be much easier if I told you when and where instead of coming up with a number, okay?
Q All right.
A The first time I recall talking with Sam after I left the CIA was in approximately the spring of 1972. I was living in Chicago practicing law at the time. The next time I recall having any contact with Mr. Adams was in January of 1983. Is that when the broadcast was? Then the next time I had a conversation with Mr. Adams was in July of 1983, which was a telephone conversation, so was the January one. Then I had another conversation with Mr. Adams, my best recollection is two weeks ago Tuesday. Then I had conversations with Mr. Adams starting Tuesday at 4:30, I think—no, that's not true. I was walking up to change an airline ticket and I saw Sam Adams across the street and I said Hello to him. Then at 4:30 he came over here. I talked to him for a while then. I went and got my wife and went to dinner. Then during the breaks of the deposition before and after, Mr. Adams and I have spoken. I think we also...
exchanged Christmas cards for maybe two years after I left the
Agency.

Q Can you now, please, detail for me each and every
conversation, what was said, as you remember it, please?
A Yes. Going back to the spring, I think it was
spring of '72, all I know is that I was living in Chicago at
the time. Sam Adames called me on the phone and we generally
talked about the CIA for 10 to 15 minutes, what I recalled of
the effectiveness and the efficiency of the CIA Vietnam
intelligence effort. He asked me if I would do an Affidavit
for him based on my experience and, as I recall, this had to do
with something dealing internally, internally CIA. It would
have been for internal CIA.

Q Did you agree to give him an Affidavit?
A I said, "Yes, I would be happy to tell him, put it in
an Affidavit what my experience and impressions were concerning
the intelligence effort." My best recollection now is that it
only dealt with CIA and not any other intelligence.

Q Did you do an Affidavit?
A You know, my recollection now is that I did not. But
let me follow through with this. Sam then said he would come
out and talk to me. He came to Chicago. He was there maybe a
day. I was working at the time so I met with him after work.
Again, we went out to dinner. He brought me a vise grip wrench.

My recollection—I very easily could have done an Affidavit. I
just don't recall now. I certainly was willing to, and it would have been based on what was going on in the CIA.

Q At the time you were there?
A At the time I was there, yes.
Q You do not recall why he wanted this Affidavit?
A Well, my best recollection, it had to do with his observations that the CIA had not done a very efficient job in its intelligence analysis on Vietnam.

MR. MASTRO: We've reached the noon point where we agreed to break.

Q (By Ms. McGinn) Let's continue with this line of questioning.
A I don't have anything until after lunch, so if you'll work through lunch--
Q I'll be glad to.
A Do you want me to continue?
Q Yes, please.
A The next time I recall any contact or communications with Mr. Adams was sometime December of '67 or January of-- excuse me, I'm great on dates--December of '72--or '82--or January of '83. Sam called--I think he called the first time and I wasn't home, I'm sure that's true, to tell me that CBS was going to air a special on this whole numbers problem.
Q Mr. Parry, can I ask you whether that was December, '81 January '82?
A  Excuse me. No. Well, my recollection is that the
broadcast—oh, no. Yes, it was December, '81—January, '82.
That's right.

Q  Please continue.

A  Okay. He called to tell me that. Oh, he also said
he was writing a book and he said, "I apologize, your name is not
going to be on the TV show." That was in jest, and I told him
how upset I was about that because I thought this would be
great national exposure for me, although, he said, "Your
presence is noted", and that's because I gave him the 150
document he referred to as some analyst giving him a document,
the 150,000 document. I tried to get back to Sam after the
broadcast. I attempted to call him three or four times. I
was in Washington, I was in Philadelphia and no one ever
answered. So I didn't talk to him.

Q  Can I interject a question here?

A  Yes.

Q  What did Mr. Adams tell you about the broadcast?

A  That was basically it. He just said, "It goes through
the whole numbers thing."

Q  How, specifically, did he—

A  That's it. We didn't get specific at all. He just
told me this was going to happen and he said, "You'll have to
read my book when it gets published."

Q  Did he ask to interview you for the book?
A No. No, I don't think so. I tried to get in touch with him and didn't.

Q Why did you want to get in touch with him?

A To tell him what I thought of the broadcast. The next time I heard from Sam Adams, he called me and asked if I would be willing to talk to one of the attorneys representing CBS.

Q When was that?

A It was approximately—it was probably about six weeks ago. I said I would be happy to talk to anybody.

Q What did he tell you about the litigation?

A We talked a bit about the litigation. I've read everything that's been in the news magazines, the newspaper, TV Guide. I've kind of followed this thing. I've heard that there was going to be a sequel to the first broadcast, I wanted to see the second. It was something that I was interested in, it's something that I participated in. Yes, I was interested in it. I was interested in it because I really felt something should have been said and I was glad something was said and so I wanted to know everything about what was being said. So I can recall one thing, you know. He said, "Hey, somebody from CBS will come out and talk to you. They want to find out whether you think I was an okay guy or not, they want to know something about what you did", and he said, "I'll still like you", or something like that. "even if you say that you think I'm a nut."

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We were joking on the phone.

Q. What did Mr. Adams tell you about the litigation?

A. I don't think we talked specifically about the litigation. I mean, yes, we talked about the litigation. He said they wanted to talk to me about my relationships with him. That's where the comment came up about he would still like me if I said I thought he was a nut. We didn't get into specifics as to how I could be helpful or anything like that. We didn't talk about—he didn't say, "They want to go over the numbers with you, he'll want to go over your estimates with you", none of that. There just wasn't. He just said, "This guy is going", I think originally he said, "We would come out", that he would come with a representative of CBS. He gave me a number of someone from CBS who would call me and make arrangements.

Q. Can we go on to the next conversation?

A. Yes. The next conversation I had with Sam Adams was approximately two weeks later. That's when he came to my office.

Q. That would have been sometime early August, late July?

A. I think it was two weeks ago Tuesday. I think that's approximately right.

Q. How long was he at your office?

A. He came, I guess it was around—guess it was early in the morning, 10:00, something like that. I think it was about 10:00 Tuesday morning, as I recall. It could have been Monday. We talked until noon. Then we went to lunch. We went

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to dinner that night with my wife. I saw him again the next day, I think it was eleven o'clock, and we were together for maybe two hours. I could be mixed up on the lunch. It's possible the lunch was the second day and not the first day. We went to the Lion's House.

Q Did you spend time with Mr. Adams after lunch on the first day but before you had dinner with him?

A That's where I'm mixed up. My recollection is that we walked out of the Lion House and they went to the right to the Hotel Utah and I went across the street through the mall. So there is a good chance that that was the second day, the day that they came in at eleven o'clock, were there for an hour and we went to lunch and they were gone. That's my best recollection.

Q To whom do you refer when you say "they"?

A Counsel for CBS, Mr. Mastro, Randy.

Q Mr. Mastro was with Mr. Adams when he came to visit you two weeks ago?

A Yes.

Q Was Mr. Mastro present at all the conversations you had with Mr. Adams during that time?

A Basically, yes.

Q Can you now tell me what you discussed during those conversations?

A Yes. When I had talked to Mr. Mastro earlier and he...
had talked to me about doing a deposition for this case. I said, "Yes, I would, and is there any way that you could get me my papers on the guerillas, militia, recruiting or whatever else?" He said he didn’t know if they had them, but he would see what they could do. When he came with Mr. Adams to my office, they had the documents, my papers, and some others, and they basically gave them to me, asked if I would read them and that they would come back and talk to me about them. We talked for probably an hour before they left to leave me with the documents. It’s quite possible if the lunch was the second day that they didn’t get there until afternoon of the day before because I—anyway, we didn’t spend too much time together. We went over my history at the CIA, we went over—this was before I had had a chance to read through my paper—we went over—Randy went over what my relationship was with Sam and Sam left the room. He asked me, basically, the questions which a good attorney would ask any prospective witness. He asked me questions of who I knew, what I had seen while I was there, documents, cables, how much I knew about the OB Conference and the Saigon time, the negotiations over the NIE. He was just asking me questions and I was just giving him answers.

Q Did he refer to specific documents and cables?
A He gave me a stack of documents which included my documents, my papers, and said—he said, if I want to look at them, "Go ahead, they may refresh your recollection." No, I
don't recall that -- I really don't recall. They were documents.
He had documents for me. It wasn't that he was pulling from
his briefcase documents and saying, "How about this, how about
that." He said, "Here are the documents, go ahead, they may
refresh your recollection." I had asked for some and I was glad
that he supplied them to me since I hadn't seen my guerrilla
paper in a long, long time. That was about it.

Q  Mr. Parr--

A  And they left.

Q  When they gave you that guerrilla paper, was that the
declassified or the still classified paper?

A  It's what's been marked as Defendants' Exhibit 61. He
gave me the George Allen paper. He gave me my May analysis of
the MACV April OB. He gave me a couple of things that Sam had
done.

Q  What were those things?

A  One was an analysis--Sam's analysis of the NIE
and another paper that Sam had done after the OB Conference, the
April OB Conference. There were some cables. He showed me
some MACV OB's. I looked through them.

Q  Do you recall if they were the same MACV OB's as we
have presented in evidence here?

A  As I recall, there were two OB's that were presented.
One was the early July, '66. Another one was sometime in. I
think, late '67. I really can't remember. We didn't discuss
them and, I'll tell you, I didn't want--I mean, I'm not going to read an OB.

Q. What cables did they show you?

A. Well, when we get to the cables and things like that, I didn't read all of the stuff. There were also some newspaper articles that they said, "If you want to look at", which included the Harper article, and I just decided I didn't want to do that before my deposition. I looked at cables, and one of them that I do recall that was there was one that's been marked as an exhibit, I think it was Exhibit 52, Defendants' Exhibit 52. The reason is I think we actually--he asked me a question about that. He read me a paragraph and said, "What do you think about that", basically, and I told him. There were other cables. There were other reports. I recall that there was one report which came out of the task force or South Vietnamese Branch because we were doing those probably on a regular basis, was a situation paper, and there was one piece of one of those that was there. The only documents that I read all the way through was my guerilla paper, the militia paper, my May, whatever date it was, 1968 paper. The others, I looked at them, some, some I didn't. I didn't read the articles.

Q. Did anybody read you paragraphs from other cables?

A. That's the only one I recall. There may have been others. I was, basically, just talking.

Q. What were you talking about?
My experience in the CIA as far as the numbers were concerned. When I joined the task force—when I joined the CIA, what did I do. When I joined the task force, what I had done to get estimates, my filing system, what I relied on, what documents. Sam Adams was there most of the time that we were discussing, except when we were discussing him personally. He wasn't talking, I was doing the talking. Anyway, that's not to say that there wasn't talking going on. I can remember one, as I recall, where we were talking about—where I mentioned the 180,000 document, the Ahn Son speech, the notebook with the Ahn Son speech in it, and that's not his real name, he's got an a/k/a, but that's longer and more difficult and I know Sam said what the A/k/a was. I'll stick with Ahn Son because it's still shorter and easier. We went through how I developed my estimates. We went through my relations and contacts with SAVA, Carver, Allen. He asked me about whether there was anyone else in the South Vietnamese Branch who was doing guerilla estimates, now we're getting into his work product, that he ought to go interview. I said, "During the time I was there, I was the one that was doing it."

Q. What else did Sam tell you during these conversations?

A. Sam, basically, said, "Well, whatever you want to get, it's in the documents there, so whatever you want to review, go ahead and review it." In fact, as I recall, we started talking about my feelings of the NIE 14.3 and that discussion was
cut off by Randy, and I don't know why, but I recall—and Sam said, "Well, there's a memo in there, if you want to read it."

I, of course, talked to him socially, talked to Sam Adams socially quite a while. I had been out, the summer that I was at the Agency when I went—I was not there with my wife, I was there alone, and so I went out to dinner at his house, I think twice during the summer. I went swimming in a lake out there. So we talked about that and we talked about his wife and his son and we talked about his dog. Then they left.

Q What did Mr. Mastro tell you during these conversations?
A He was, basically, listening. I did not perceive him as a guerilla expert.

Q Did he ask you questions?
A Yes. He asked me questions like, "Well, now, tell me how you kept your files, tell me"—I mentioned the computer thing and he asked me to explain the computer research. So I went through the fact that these things were put on computers and I went through as many of the 32 or 33 variabilities that we were putting into the computer. I went through all of that kind of methodology with him. He obviously asked me questions about the people. He asked me if I knew MACV people and I went through names.

Q Do you remember some of those names?
A I can remember some of those names. I remember he mentioned Hawkins, he mentioned. I think, McArthur. I think he...
mentioned a Graham, and I said, to my knowledge, I hadn't formally met any of them unless they were at the April OB Conference. I've never had, really, a conversation with any of the MACV people. He asked me about—he explored with me, at least I perceived he was, why we were doing estimates in the task force when Sam was doing them at SAVA. We talked about conflicts, whether there was rivalry. We talked about cooperation. He wanted to know the chain of command from me—my guess was just to find out where I fit into this whole thing. I did get into, when I was talking with him, my specific recollections of guerilla problems, things that I could recall.

Q What do you mean by "guerilla problems"?

A Numbers problems. I can remember in Nam Tram or Binh Tram, a coastal province, where the MACV—we found a document that said 1,700 guerilla and MACV carried 1,700 for five or six months in their OB. These are things that I recall. Some of the I mentioned. The Pleiku-Gai Lai documents, Binh Dinh documents, I discussed with them, told them about the 1,700 document. He was asking me, "How could you come up with an estimate", just like was asked me in my deposition, and the way I explained it to you is what I told him, you would get the small documents and you would build up on that and take the buildup and apply that to the big geographical documents and come up with your estimates. I spent a lot of time explaining how I came to this. I spent a lot of time talking about reasons why I thought that.
the MACV Order of Battle was wrong. That was on a specific—as I can recall—province by province, district by district, and basically—not basically, but I referred to the May memo that I wrote where I tried to say that I thought that the April MACV Order of Battle on guerilla strengths was about as useful as garbage. That was my May memo, and I went over that. We did most all of our discussing the first day.

Q Did anyone ask you about your reports on infiltration?
A He asked me what I knew about infiltration. He asked me what I knew about recruitment. I told him the same thing that I said in the deposition, that I read all the documents, therefore, I got an inkling as to what was going on in infiltration that was included in the OB's. I don't know if you want me to go back over the whole thing, that I'm not an expert on infiltration, but that I read a bit about it to know what was going on, if they were in document reports there somebody was talking about a new unit coming down or that type of thing. We got into infiltration. We didn't get that much into recruitment. I told him that I was working on four areas of research. I said papers. We also wrote, but there were three areas of research in the fall of '67, and I mentioned those four to him.

Q Has this exhausted your recollection of your conversation two weeks ago?
A Yes. Pretty much. I mean, I'm sure as I sit here I...
can keep thinking of other things that were said or discussed.

He was, basically, just interviewing me in Sam's presence.

Q Your next conversation with Mr. Adams was?
A Oh, well, that night we went to dinner.

Q You and your wife?
A All four of us, and there was nothing—I don't think we discussed anything. I mean, there may have been something that came up with the conversation. My wife is not one that takes a real big interest in Viet Cong guerrillas. Something could have come up, but there was no serious discussion. Then we drove them back to the hotel. The next morning they were going to get up early and go partake of some of the nice scenery around here and at about eleven o'clock they called us and said that they had slept in. They came over—it was before 11:00 because they said they would be over at 11:00. They came over at 11:00 and Randy said, "Have you read through the things?" I told him I had read through my papers. He says, "Do you have any questions that you want to discuss?" I said, "No, it's there." He says, "What about the other documents?" My best recollection is I said I hadn't read them. All I had read is my guerrilla paper. I did ask if he had a militia paper. Not a paper, but there was a captured document that was big that really discussed the militia forces and that wasn't in the stack. I was hoping that that was available. It was a captured document and it was really one of the best ever.
Q Did they leave those documents with you?
A They left all those documents with me, yes.
Q Did Mr. Adams take notes during those conversations with you?
A No.
Q Did Mr. Mastro take notes during the conversations?
A Well, yes, to a limited extent. The next morning they came over and they asked, basically, that. I can't recall that we discussed anything more. We may have gone into more that second day on George Allen and the militia paper, basically, how did I fit into the whole thing. We then went to lunch, we separated at that time. I think the next--I'm not sure whether it was Mr. Adams or Mr. Mastro, but the next one was the telephone call telling me when they would be in town prior to the deposition. They said they would come over on the afternoon before the deposition to talk to me, and they showed up about four o'clock on the day before the depositions, so it would be Tuesday afternoon.
Q What do you recall about that conversation?
A Randy, again, asked me questions. Basically, the same questions. He asked me if I had read the documents. I said, "I've read through some of them." I said, "I would like to keep my guerilla paper, is that okay?" He said, "Yes." Some papers on the OB Conference. They were some which included my guerilla paper, Allen's militia paper, my May paper, and I think
I kept Mr. Adams' analysis of the OB. I said that I wasn't planning on reading anything else, "You can have it all back."

I had, as I mentioned before, I had looked through those documents to see what they were. As I said, they included some articles. I think there was one in there by Gaines Hawkins—is that his name?—I'm not sure. I didn't read that either. Anyway, I gave the documents back. I think that's one I gave back. I'm trying to think of anything new we went over. Yes, we did. We went over how the depositions had gone. He was basically, telling me what the format—I mean, not who asked questions, I obviously understood that, but we went through the areas he wanted to cover and he suggested the areas that you might want to cover.

Q: What areas were they for him that he wanted to cover?
A: He wanted to cover my background, and we went through some of that, school. As I recall, I pulled out a resume, just to recall.

Q: Did you give him a copy of that resume?
A: I don't know if I did or not. I may have. It was the one I prepared for my trip to China so it left everything with the CIA off. I may have. I just really don't recall. We went—okay. So he mentioned that area and he went through that. Then he said he's going to want to get into the guerilla estimates and in doing that he wants to go through my methodology how I kept my files, the reports, what I knew about—well, the
numbers all the way through. We didn't go over that.

Q: You--

A: We did not go over that. He just told me these were the things he wanted to talk to me about.

Q: He didn't ask you questions?

A: No. He asked me if I had any questions, and I said "No."

MR. MASTRO: For purposes of Mr. Parry's schedule, are we close to completion? We've gone over the time we said we would let him get back to work today.

THE WITNESS: I'm willing to finish up the contacts with Mr. Adams.

MS. McGINN: Thank you.

MR. MASTRO: I just wanted to--

THE WITNESS: It's 12:30 and I still have a little time.

MR. MASTRO: Fine.

THE WITNESS: He said he wanted to go through my knowledge of Self-Defense militia. He said we would talk about the April OR Conference and the paper, and that's about it.

Q: (By Ms. Mc Gin n) What did he suggest I might want to cover?

A: He said that you would obviously ask questions on everything that he asks. Oh, that you would ask questions concerning my relationships with Sam. There was a third area,
and we would go over the relationship between the OB and CIA. That's the one I'm thinking of. I can't think of the third area. The relationship between CIA and my estimates and the MACV Order of Battle. He said, "I'm going to cover that anyway." If I recall it, I'll tell you. There was a third area.

Q Do you recall what else was said at this conversation, at this meeting?
A I didn't last very long.

Q How long did it last?
A About an hour because I had to go--my twins are babytended way up north and we were going to pick up my wife, who lives way down south and be to dinner, and that jaunt takes about almost two hours by the time you load the kids in the car and have them say Good-bye to everybody. We talked for about an hour.

Q Did you have dinner with them that night?
A Yes. Again, with my wife. We went out to dinner. I know we didn't talk about anything--oh, no. We did not go to dinner. No, we did not go to dinner. It was the next night. They still left, I can't recall why. Anyway, they were here about an hour Tuesday.

Q I'm getting confused on your testimony.
A Yes, I know.

Q You did have dinner with them that night or you did not
A I did not.
Q That was Tuesday night?
A Tuesday night I did not have dinner with them.
Q Did you speak to Mr. Adams and Mr. Mastro before
the deposition on Wednesday morning?
A Yes.
Q Did you speak with them privately in your office?
A It was in my office.

MR. MASTRO: Object to the form.

THE WITNESS: They got here probably 10 minutes, 15
minutes before the deposition was to start. They said
they would be here a half hour before, I think it was. They
came 10 or 15 minutes before the deposition started.
Q Do you recall the conversation at that meeting?
A It did not have to do with the deposition. We just
talked. I mean, we didn't talk about anything that was going to
be asked or anything I was going to say at the deposition. They
didn't ask me any questions about any of my experience. That's
all I can recall. I mean, there wasn't anything of substance.
Q Did you have any conversations with Mr. Adams during
the course of Wednesday when nobody else was present?
A I doubt it.
Q Did you have any conversations with Mr. Adams when
Mr. Mastro was present?
A Yes.
Q. Do you recall those conversations?

MR. MASTRO: What day is this we're talking about?

THE WITNESS: This is Wednesday. That was the day we were upstairs, right? I can recall a comment that I made to Randy and that he agreed with.

Q. (By Ms. McGinn) What was that comment?

A. I said, "I think I may be rambling in my answers. I'll try and do better this morning and not go on at any length." He said, "Yes, that would be better."

Q. Do you recall any other conversations?

A. Well, yes. I can recall I asked a couple of questions of Sam concerning things that I had said, saying, you know, asking, "Was that what you recalled?" I can't recall them. It wasn't anything serious and it wasn't anything that I went back and changed. But I know there were some--I can recall a couple of things.

Q. Did you have dinner with Mr. Adams on Wednesday night and Mr. Mastro?

A. Yes. It was Wednesday night.

Q. Was your wife--

A. That's when I picked up my twins, Wednesday.

Q. Was your wife also present--

A. At the dinner, yes.

Q. --at the dinner? Mr. Parry, on Thursday, which was yesterday, do you recall whether you had any conversations with...
Mr. Adams during which no one else was present?

A. I don't think so.

Q. Any conversations with Mr. Adams and Mr. Mastro?

A. Yes. He was present during the conversations. Maybe I'm answering your questions wrong. Basically, my conversations have been with Mr. Mastro. That's the way it was Thursday morning, not with Sam. He was there, but--

Q. This is Thursday morning prior to the continuation of your deposition testimony?

A. Prior to the deposition, yes.

Q. Do you recall what was discussed?

A. Yes.

Q. Can you tell me?

A. Again, it was very brief because they got here just before the questions started. I recall one thing Randy Mastro said, "I apologize, but I'm going to go back over a number of questions that I asked yesterday."

Q. Do you recall anything else he said?

A. We talked about that a little because I said, "Listen, I'm never as good in the rerun as I was in the original." He said, "Well, there are just a couple of things I want to clear up."

Q. Did he tell you what he wanted to clear up?

A. I can't recall. He may have said that he wanted to go back over the OB's. I don't know whether he said that or whether
I assumed that because we did.

Q. Do you recall what Sam Adams said during these conversations?

A. I don't think he said--I mean, he may have talked, but not about the depositions.

Q. Do you recall any other conversations among the three of you only on Thursday?

A. Well, yes, we talked. We'd take a break and obviously we talked about the sandwiches for lunch. We talked about getting documents copied, exhibits. We also talked about my hope of getting this thing over with and being through each day by 4:00 so that I could get some work done. That's something I left off. I've talked about that quite a bit. I don't recall of anything of substance yesterday.

Q. Do you recall meeting with Mr. Mastro and Mr. Adams after the deposition was over yesterday afternoon?

A. I can remember sitting in my office with them. Nothing concerning--I mean, nothing of substance concerning the deposition was discussed. No questions or answers were discussed.

Q. How long did you talk to them yesterday?

A. It was very short because Sam kept saying--apologized for the interruption saying, "I know you've got to be doing some work tonight, so we'll leave."

Q. Do you recall what was discussed?
A: I really just don't recall anything concerning the deposition. Sam and I were talking about some times—and I'm not sure if it was last night of the night before, about his old television set. I went out to watch the landing on the moon and lightning had blown out his TV just before I got there. That was the summer I was back in Washington and he invited me over to watch it. He mentioned that he still had the same TV. I'm not sure if that was last night or the night before. We did discuss—

I asked about his dog, whether he still had the same one, and we did discuss some anecdotes about the dog which he had when I was there. It was an interesting dog. That's all I really do recall.

Q: Those are all the conversations you recall of having yesterday with him?

A: Well, are we referring to last night after the deposition was concluded? Oh, I think Randy said one other thing. He said, "I think her cross-examination is going to be longer than I had anticipated." He did say that.

Q: Longer than you had anticipated?

A: I think this whole deposition has gone longer than I had anticipated. I thought we would be through in a day.

Q: Mr. Parry, have you had any conversations with Mr. Adams, just the two of you, today?

A: We were standing in the hall talking.

Q: Any conversations with just the three of you, Mr.
Adams, Mr. Mastro and yourself?

A Well, they stopped in my office on the way in here. That was like 9:25 or 9:30. It was real close to when we were to start and Sam left, came down here. Randy was there while I was dictating part of a letter to my secretary, taking a telephone call. We didn't talk about anything. I mean, we did talk, "Hi", but--

Q Did Mr. Adams ask you whether you would prepare and sign an Affidavit for this litigation?

A No, I don't think he did. When he called the first time he said that they wanted to come out and interview me. My recollection is that I never talked to Mr. Adams about an Affidavit for this litigation, just that other one that I've referred to earlier.

Q Did Mr. Mastro ask you about an Affidavit?

A After I talked with Mr. Mastro on the first time, he asked me if I would be willing to do an Affidavit, and I said, "Yes, but if you want one, you've been taking notes, you draft it up, I don't have time." And that's the last I heard about the Affidavit. The next thing I heard was they called up and asked if I would be willing to have my deposition taken.

Q Did anyone tell you that they were going to do your deposition rather than prepare an Affidavit?

A They didn't say anything to that effect. They just said they wanted to take my deposition. That's my understanding. It
may have been—he may have. He may have said "We've decided
to take your deposition if you're willing instead of an
Affidavit." I don't know, but if they were going to do an
Affidavit, we left it that he would prepare it based on the
notes and get it back to me and then I would go over it again.
I didn't think they would do it.

MS. McGINN: I think that's all for today. I
appreciate your giving me this time. Could I say one more thing
on the record. During testimony Mr. Parry referred to, I guess,
a paper that Mr. Adams had drafted after the April Conference,
the April OB Conference about the Order of Battle. Can you help
me on that, Mr. Parry? Do you recall?

THE WITNESS: Well, my recollection is that in the
packet there was a document—I may have been mixed up and there
may have been just the one analysis of the NIE that he did.
Somehow I seem to recall that there was one that was done in the
OB. It would have been May.

MS. McGINN: I just want to ask Mr. Mastro if that
rings any bells for you and, if so, could you identify that
for me?

MR. MASTRO: I really have no recollection of that.

THE WITNESS: Then it must be the NIE one. Sorry.

MR. MASTRO: I recall no such document and showing it
to Mr. Parry.

MS. McGINN: Would you mind asking your client, Mr.
Adams, if he recalls drafting that and giving that to you? It may be that you've produced something like this. I'm trying to identify it for our purposes.

MR. MASTRO: Excuse me. This is not Mr. Adams' deposition.

MS. McGINN: You can ask him in private, if you want.

MR. MASTRO: I would be happy to ask Mr. Adams in private, but I'm sure he would give the same response I gave. I don't recall such a document given to Mr. Parry.

MR. ADAMS: I don't know what the document is.

MR. MASTRO: I will confer on this question and tell you when we resume this deposition, whether Mr. Adams recalls such a document, but since Mr. Adams did not prepare any packets for Mr. Parry or any documents for Mr. Parry, I think the answer is clearly no, he will have no recollection of that. But I will confirm that and let you know when we resume.

MS. McGINN: Would it be possible for you to let me know before we resume?

MR. MASTRO: I would be happy to do that.

MS. McGINN: Thank you, Mr. Parry.

(Whereupon, the deposition was adjourned, to be continued at a date to be agreed upon by all parties.)

* * *
CERTIFICATE

STATE OF UTAH
COUNTY OF SALT LAKE

I HEREBY CERTIFY that I have read the foregoing testimony consisting of 331 pages, numbered from 3 to 331, inclusive, and the same is a true and correct transcription of said testimony except as I have corrected it in ink, giving my reasons therefor and affixed my initials thereto.

__________________________
DOUGLAS J. PARRY

SUBSCRIBED AND SWORN to at __________________________

__________________________, this _____ day of ____________, 19__.

__________________________
NOTARY PUBLIC
Residing at __________________________

My Commission Expires:

__________________________

HARMON, SHINDURLING, BROWN & THACKER
CERTIFIED SHORTHAND REPORTERS
SALT LAKE CITY, UTAH
CERTIFICATE

STATE OF UTAH

COUNTY OF SALT LAKE

THIS IS TO CERTIFY that the deposition of:

DOUGLAS J. PARRY

the witness in the foregoing deposition named, was taken before me, LANETTE SHINDURLING,
a Certified Shorthand Reporter and Notary Public in and for the State of Utah, residing at PROVO, UTAH

That the said witness was by me, before examination, duly sworn to testify the truth, the whole truth and nothing but the truth in said cause.

That the testimony of said witness was reported by me in Stenotype, and thereafter caused by me to be transcribed into typewriting, and that a full, true and correct transcription of said testimony so taken and transcribed is set forth in the foregoing pages numbered from 3 to 331, inclusive, and said witness deposed and said as in the foregoing annexed deposition.

I further certify that I am not of kin or otherwise associated with any of the parties to said cause of action, and that I am not interested in the event thereof.

WITNESS MY HAND and official seal at Salt Lake City, Utah, this 29th day of AUGUST, 1983.


LANETTE SHINDURLING, C.B.R.
UTAH LICENSE NO. 122

HARMON, SHINDURLING, BROWN & THACKER
CERTIFIED SHORTHAND REPORTERS
SALT LAKE CITY, UTAH

333
CERTIFICATE

STATE OF UTAH  
COUNTY OF SALT LAKE)

THIS IS TO CERTIFY that the deposition of:

DOUGLAS J. PARRY

the witness in the foregoing deposition named, was taken before me,  MILO N. HARMON,
a Certified Shorthand Reporter and Notary Public in and for the State of Utah, residing at  SALT LAKE CITY, UTAH.

That the said witness was by me, before examination, duly sworn to testify the truth, the whole truth and nothing but the truth in said cause.

That the testimony of said witness was reported by me in Stenotype, and thereafter caused by me to be transcribed into typewriting, and that a full, true and correct transcription of said testimony so taken and transcribed is set forth in the foregoing pages numbered from 3 to 331, inclusive, and said witness deposed and said as in the foregoing annexed deposition.

I further certify that I am not of kin or otherwise associated with any of the parties to said cause of action, and that I am not interested in the event thereof.

WITNESS MY HAND and official seal at Salt Lake City, Utah, this 29th day of August, 1983.

My Commission Expires:
August 1, 1987