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**Scott McKay**

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**From:** Mark Ryan <mryanboise@msn.com>  
**Sent:** Thursday, October 13, 2022 9:52 PM  
**To:** Scott McKay  
**Subject:** Fw: Prime - interview disks

See below re request for audio disks.

-Mark

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**From:** Jackson, Laurianne <Jackson.Laurianne@epa.gov>  
**Sent:** Friday, August 19, 2022 3:14 PM  
**To:** Mark Ryan <mryanboise@msn.com>  
**Cc:** Figur, Charles (he/him) <Figur.Charles@epa.gov>  
**Subject:** RE: Prime - interview disks

Mark

I am just back from my trip. EPA has not put any discs into evidence. These are the complete IARs, with the photo copy of the disc. It is my understanding the discs are housed at the Boise field office and /or R10. I believe the photo copies are included in the IAR as part of the criminal investigation/chain of custody. Of course, under Part 22, EPA is limited to the evidence we've submitted to the court.

We have not submitted any disc/interview recordings as part of our preliminary exchange. EPA has been responsive to your requests and shared the IARs, including photocopies indicating there are related discs, in January 2021. We will continue to be responsive. Please feel free to call me Monday to discuss or we can add this to our discussion for Tuesday.

Laurianne M. Jackson  
Senior Assistant Regional Counsel  
Regulatory Enforcement Section  
(and) Regional Criminal Enforcement Counsel  
U.S. Environmental Protection Agency, Region 8  
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Pronouns: She, Her, Hers

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**From:** Mark Ryan <mryanboise@msn.com>  
**Sent:** Thursday, August 18, 2022 11:21 AM  
**To:** Jackson, Laurianne <Jackson.Laurianne@epa.gov>  
**Cc:** Figur, Charles (he/him) <Figur.Charles@epa.gov>  
**Subject:** Re: Prime - interview disks

Thanks, Laurianne. Yes, I remember getting the CID documents, but I don't recall receiving any disks of audio recordings such as on Exhibit CX22. I shouldn't have to make a request for public records for a disk you have put into evidence. If you provided me with a hard copy of the disk, let me know, but I don't have one in my files, and I don't recall ever receiving one. Thanks.

-Mark

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**From:** Jackson, Laurianne <[Jackson.Laurianne@epa.gov](mailto:Jackson.Laurianne@epa.gov)>  
**Sent:** Thursday, August 18, 2022 8:13 AM  
**To:** Mark Ryan <[mryanboise@msn.com](mailto:mryanboise@msn.com)>  
**Cc:** Figur, Charles (he/him) <[Figur.Charles@epa.gov](mailto:Figur.Charles@epa.gov)>  
**Subject:** RE: Prime - interview disks

Hi Mark

As indicated, I am on vacation this week. Chuck is also out of the office.

At your request, in January 2021, I previously provided you with all the records that we had received from R10 CID on or about January 22, 2021. These documents included only the IARs and attached documents. If you would like to make an additional request, I will work with CID to get you the information when I return to the office on Monday. To that end, please send an email with exactly which recordings you would like to review.

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**From:** Mark Ryan <[mryanboise@msn.com](mailto:mryanboise@msn.com)>  
**Sent:** Wednesday, August 17, 2022 6:00 PM  
**To:** Jackson, Laurianne <[Jackson.Laurianne@epa.gov](mailto:Jackson.Laurianne@epa.gov)>; Figur, Charles (he/him) <[Figur.Charles@epa.gov](mailto:Figur.Charles@epa.gov)>  
**Subject:** Prime - interview disks

In your prehearing exchange, see e.g. CX22 at 8 of 8, you have photocopies of interview disks, but we never got the disks. Will you please supply those to us? I've left voice mails and texts with each of you already. I'd like to avoid a motion to compel, if possible. Thanks.

-Mark