

1 A. Yes.

2 Q. Has there been an instance when -- where the credit
3 department -- let me ask you this first.

4 Does the credit department determine from their
5 D & B and their credit due diligence analysis whether the
6 corporation wants to do business with this business?

7 A. Yes.

8 Q. What does the credit department base that on?

9 A. The Dun & Bradstreet rating.

10 Q. Now, do you know a gentleman by the name of Casey
11 Courneen?

12 A. I do.

13 Q. Let me ask you this first. Were you the person that
14 provided -- did you provide a copy of the Dun & Bradstreet
15 report to the FBI upon their request?

16 A. Not to my knowledge.

17 Q. Do you know if Mr. Courneen provided that information
18 to them?

19 A. Not to my knowledge.

20 Q. Are you familiar with what's on a Dun & Bradstreet
21 report? Have you ever had an opportunity to view those?

22 A. I have.

23 Q. Are you familiar with their rating system?

24 A. Somewhat.

25 Q. Are you familiar with the term financial stress