

**PETER P. STRZOK'S NOTICE OF ADDITIONAL INQUIRY AREAS FOR
DEPOSITIONS AT ISSUE IN MOTIONS TO QUASH**

Mr. Strzok submits this notice to supplement his areas for inquiry of former President Trump (ECF No. 89, Case No. 1:19-cv-2367) and in further support of his opposition to Defendants' Motion to Quash or for a Protective Order (ECF No. 9, Case No. 1:22-mc-27). The materials quoted below were published after Mr. Strzok's notice of September 29, 2022 regarding areas for inquiry.

1. Additional Statements by Former President Trump Regarding Mr. Strzok's Termination. On February 2, 2023, President Trump appeared on the Hugh Hewitt Show and stated in part:

Don't forget, these guys, before I even got in, they were spying on my campaign, long before I got in. This didn't just happen. And *if I didn't fire Comey, and if I didn't fire McCabe and Strzok* and Page and all of that scum that was in there, you would have had, they were trying to do an overthrow. And they, just think of it. They spied on my campaign from the time I came down the escalator. And here I am, innocently running to do something great, and I have this garbage that's in there headed up by Comey and the group. They spied on my campaign, and *I got rid of them all. I got rid of them all.* But it was more than them. It was more than them, and you know that. And you know that's coming again.

HughHewitt, *Former President Donald Trump On Nikki Haley's Announcement, Taiwan, Ukraine And More* (Feb. 2, 2023), <https://tinyurl.com/mrydfwfr> (video recording at 9:42). Mr. Strzok would question President Trump as to the veracity and basis for these and similar recent statements, his intent in making them, and his understanding of their likely or actual effects.

2. Conversations Regarding Investigations into Mr. Strzok. On November 13, 2022, the New York Times published an article that reported in part:

[John F. Kelly, Trump's second White House chief of staff] said that along with Mr. Comey and Mr. McCabe, Mr. Trump discussed using the I.R.S. and the Justice Department to investigate the former

C.I.A. director John O. Brennan; Hillary Clinton; Jeff Bezos, the founder of Amazon and the owner of The Washington Post, whose coverage often angered Mr. Trump; Peter Strzok, the lead F.B.I. agent on the Russia investigation; and Lisa Page, an F.B.I. official who exchanged text messages with Mr. Strzok that were critical of Mr. Trump.

Michael S. Schmidt, *Trump Wanted I.R.S. Investigations of Foes, Top Aide Says*, N.Y. TIMES (Nov. 13, 2022), <https://tinyurl.com/mss33j43>. Mr. Strzok would ask President Trump about the accuracy of Mr. Kelly's statements, what investigations into Mr. Strzok, Ms. Page, or their colleagues President Trump discussed or demanded, who participated in those discussions, when and where they occurred, what President Trump's intent was, and what he believes the results or effects of those conversations were and why.

Dated: February 3, 2023

Respectfully submitted,

/s/ Aitan D. Goelman

Aitan D. Goelman (D.C. Bar No. 446636)
Christopher R. MacColl (D.C. Bar No. 1049153)
ZUCKERMAN SPAEDER LLP
1800 M Street NW, Suite 1000
Washington, DC 20036
Telephone: (202) 778-1800
AGoelman@zuckerman.com

Richard A. Salzman (D.C. Bar No. 422497)
HELLER, HURON, CHERTKOF & SALZMAN
PLLC
1730 M Street NW, Suite 412
Washington, DC 20036
Telephone: (202) 293-8090
salzman@hellerhuron.com

Counsel for Plaintiff Peter Strzok