

*Strzok v. Garland, et al.*, No. 1:19-cv-2367-ABJ (D.D.C.)

## **Plaintiff's Exhibit 86**

**To Plaintiff's Summary Judgment Memorandum**



9. At no point in time did I contemplate that Mr. Strzok would be fired from the FBI because of the texts between himself and Ms. Page. I did not believe Mr. Strzok's text messages, unprofessional as many were, merited termination.

10. Although I do not recall Mr. Bowdich saying much in the meeting, he did not express any disagreement with my reassurances to Mr. Strzok before, during, or after the meeting.

11. I interacted with Mr. Strzok professionally on a periodic basis, including in connection with the Midyear Exam and Crossfire Hurricane investigations. Mr. Strzok was among the most talented counterintelligence agents I worked with during my more than twenty-year career at the FBI.

12. I never perceived any official action or inaction by Mr. Strzok to be the result of any bias or improper consideration. Mr. Strzok's text messages have not altered my belief, which is based on my personal observations of Mr. Strzok and my knowledge of the investigations that he worked on, that Mr. Strzok never took any official action or inaction based on his political views.

13. I am generally familiar with the FBI's Office of Professional Responsibility ("OPR") and the disciplinary practices of the FBI, including because I supervised HRD as the Associated Deputy Director of the FBI and routinely reviewed the discipline imposed as the Deputy Director of the FBI.

14. Mr. Strzok's termination is disproportionate to the penalty I would expect for the offenses he was charged with, particularly given his tenure and history of exemplary service.

15. I understood that last chance agreements were entered into between an employee and the FBI, and that they guaranteed that the employee would not be terminated except upon a further serious violation of the FBI's Offense Codes. I know of no policy as of 2018 that permitted me or any other deputy director to abrogate such an agreement.

I declare under penalty of perjury that the foregoing is true and correct.

Executed on October 23, 2024.

