

IN THE UNITED STATES DISTRICT COURT  
FOR THE SOUTHERN DISTRICT OF TEXAS  
CORPUS CHRISTI DIVISION

UNITED STATES OF AMERICA

v.

CITGO PETROLEUM  
CORPORATION; CITGO REFINING  
AND CHEMICALS COMPANY, L.P.,  
and PHILIP VRAZEL,

Defendants.

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CRIMINAL NO. C-06-563-S

**NOTICE OF TAKING DEPOSITION OF SUZIE CANALES AND  
PRODUCTION OF DOCUMENTS PURSUANT TO RULE 15(a)(1)**

TO ALL PARTIES AND THEIR ATTORNEYS OF RECORD:

PLEASE TAKE NOTICE that, pursuant to Federal Rule of Criminal Procedure 15 and the Court's Order dated November 19, 2007 (Doc. 520), Defendants CITGO Petroleum Corporation and CITGO Refining and Chemicals, L.P. (collectively, "CITGO") will take the oral deposition of Suzanna Canales, on January 15, 2008, at 10:00 a.m. at the law offices of Royston, Rayzor, Vickery & Williams, Frost Bank Plaza, 802 North Carancahua, Suite 1300, Corpus Christi, Texas, 78470.

Pursuant to Rule 15(a)(1), the deponent shall produce at the deposition all documents responsive to the attached list of Documents To Be Produced.

This deposition will be videotaped and may be used at trial. Moreover, instant visual display technology will be utilized to record and convey the testimony.

## DEFINITIONS

1. The term “COMMUNICATION” refers to any meeting, conversation (face-to-face, telephone, or otherwise), discussion, telex message, e-mail message, facsimile, cable, correspondence, message or other occurrence whereby thoughts, opinions or data are transmitted between or among two or more persons or between or among one or more persons and any electronic, photographic or mechanical device or devices for receiving, transmitting, or storing data or other information.

2. The term “CONCERNING” means constituting, respecting, regarding, concerning, pertaining to, referring to, stating, establishing, showing, supporting, contradicting, describing, recording, noting, reflecting, embodying, memorializing, containing, mentioning, studying, analyzing or discussing, either directly or indirectly.

3. The term “DOCUMENTS” means any “writing,” “recording,” or “photograph” within the definition of Federal Rule of Evidence 1001(1)-(2) and includes electronic, written, typed, printed, reproduced, filmed or recorded material, and all photographs, pictures, plans, drawings, or other representations of any kind of anything CONCERNING directly or indirectly, in whole or in part, the subject matter of each designated issue and request, and includes, without limitation,

- a. papers, books, journals, handbooks, manuals, ledgers, statements, memoranda, reports, invoices, worksheets, work papers, notes, transcription of notes, letters, correspondence, abstracts, diagrams, plans, blueprints, specifications, pictures, drawings, films, photographs, graphic representations, diaries, calendars, desk calendars, lists, logs, publications, advertisements, instructions, minutes, orders, messages, résumés, spreadsheets, data compilations, records, summaries, agreements, contracts, telegrams, telexes, cables, recordings, electronic mail, voice mail, audio tapes, video tapes, audio/video files in computerized format, transcriptions of tapes or recordings, or any other writings of tangible things in which any forms of communication are recorded or reproduced, as well as all notations on the foregoing; and
- b. original and all other copies not absolutely identical; and

- c. all drafts and notes (whether typed or handwritten or otherwise) made or prepared in connection with each such document, whether used or not.

**DOCUMENTS TO BE PRODUCED**

1. All COMMUNICATIONS by and between the deponent and any juror(s) or alternate juror(s) who served in the above entitled case, and all DOCUMENTS CONCERNING such COMMUNICATIONS.

2. All DOCUMENTS CONCERNING the trial, jury deliberations and jury voting in the above entitled case, including but not limited to all notes taken by the deponent during trial and jury deliberations; all entries posted at <http://usavcitgo.blogspot.com> CONCERNING the trial, jury deliberations and jury voting; all drafts of such blog entries; and all calendars and diaries maintained by the deponent from May 2007 to the present.

3. All COMMUNICATIONS and DOCUMENTS CONCERNING the Community Environmental Forum Theater's re-creation of the trial, jury deliberations and jury voting in the above entitled case, including but not limited to all notes, sketches, scripts, drafts, presentations, organizational plans, programs, advertisements, performances, and all audio/video recordings and out-takes (including those previously but no longer available at <http://usavcitgo.blogspot.com> and [www.youtube.com](http://www.youtube.com), *see* Exhibit A attached hereto).

4. All COMMUNICATIONS by and between the deponent and any person or entity CONCERNING the trial, jury deliberations and jury voting in the above entitled case, and all DOCUMENTS CONCERNING such COMMUNICATIONS.

5. All COMMUNICATIONS by and between the deponent and any attorney for or agent of the government CONCERNING the trial, jury deliberations and jury voting in the above entitled case; any actual or contemplated contacts between the deponent and any juror(s) or alternate juror(s) who served in the above entitled case; any actual or contemplated postings by the deponent to the web log maintained at

<http://usavcitgo.blogspot.com>; the Community Environmental Forum Theater's re-creation of the trial, jury deliberations and jury voting and the audio/video recordings of same; and all DOCUMENTS CONCERNING such COMMUNICATIONS.

6. All COMMUNICATIONS by and between the deponent and any person or entity CONCERNING the deponent's prospective testimony at the deposition, and all DOCUMENTS CONCERNING such COMMUNICATIONS.

7. All DOCUMENTS used by the deponent to prepare for the deposition.

DeGUERIN DICKSON & HENNESSY

/s/ Dick DeGuerin

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