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1 Q. Do you recognize this document?
 2 A. I do.
 3 Q. What do you recognize it to be?
 4 A. It's an e-mail between -- well, among
 5 PILF employees and some others.
 6 Q. This e-mail chain is dated October 2,
 7 2016. Is that right?
 8 A. Yes.
 9 Q. And it begins with an e-mail from
 10 Mr. Adams, the subject line "Congratulations
 11 everyone." Do you see that?
 12 A. I do.
 13 Q. And he says: "Great lesson how to
 14 generate, create, organize and weaponize
 15 narrative." And then there is a screenshot of
 16 the Drudge Report home page. Is that right?
 17 A. Right.
 18 Q. And on the Drudge Report he linked to
 19 an article reporting on the Alien Invasion I
 20 report, right?
 21 A. Yes.
 22 Q. It says: "Report: 1000 plus illegal
 23 voters in Virginia..." Correct?
 24 A. I see that, yes.
 25 Q. Do you have an understanding as to

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1 THE WITNESS: Because the numbers came
 2 from the VERIS reports.
 3 BY MR. TEPE:
 4 Q. And you called --
 5 A. The number of --
 6 Q. -- them noncitizens?
 7 MR. LOCKERBY: Objection.
 8 THE WITNESS: Say that again.
 9 BY MR. TEPE:
 10 Q. And PILF called them noncitizens,
 11 correct?
 12 MR. LOCKERBY: Objection. The
 13 documents speak for themselves.
 14 THE WITNESS: Yes, we've been over
 15 what the reports say by now.
 16 BY MR. TEPE:
 17 Q. Was Mr. Adams telling you in your
 18 conversation with him that if you get to higher
 19 numbers you're more likely to get media
 20 attention?
 21 MR. LOCKERBY: Object to the form.
 22 THE WITNESS: I think that was part of
 23 what he was saying.
 24 BY MR. TEPE:
 25 Q. And then he wrote here to you: "Good

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1 what Mr. Adams was saying by "Great lesson how to
 2 generate, create, organize and weaponize
 3 narrative"?
 4 A. I think he meant that this shows that
 5 our promotion of the report was effective in that
 6 it was or appeared on the Drudge Report.
 7 Q. Well, more than that, in the e-mail
 8 above Mr. Adams says: "Noel, remember our
 9 conversation on how important it was to cross the
 10 1000 mark."
 11 Do you see that?
 12 A. I see that.
 13 Q. Do you remember that conversation?
 14 A. Yes, vaguely.
 15 Q. And what do you recall?
 16 A. Discussing that when we received the
 17 records from Alexandria, that it put the total
 18 of -- I think the total cancellations from the
 19 VERIS reports above 1000.
 20 Q. Why did you answer the total
 21 cancellations from the VERIS reports instead of
 22 the total number of noncitizens?
 23 MR. LOCKERBY: Object to the form.
 24 Argumentative and it assumes facts not in
 25 evidence.

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1 example why below and it shows in Drudge
 2 headline. It was an important psychological
 3 frontier crossed."
 4 Do you see that?
 5 A. I see that.
 6 Q. And by that do you understand him
 7 saying by crossing the 1000 mark, that was an
 8 important psychological frontier crossed?
 9 A. That's what it says.
 10 Q. And then you responded: "Amen. Great
 11 headline."
 12 A. Yes.
 13 Q. You can put that document aside.
 14 Would you agree that being able to get
 15 higher numbers of purported noncitizens was
 16 important to PILF?
 17 A. I think it's what we expected to find.
 18 Q. That's not what I asked. Would you
 19 agree that people -- Strike that.
 20 Would you agree that being able to get
 21 higher numbers of purported noncitizens was
 22 important to PILF?
 23 MR. LOCKERBY: Objection; asked and
 24 answered.
 25 THE WITNESS: Yes.