

1 and the inherent reliability of the list.
 2 Q. Okay.
 3 A. And those conversations confirmed my
 4 previous understanding, and that led to the August
 5 8th mailings going out.
 6 Q. Okay. So I'm just trying to understand
 7 your testimony. Is your testimony that between July
 8 25th, when you had the inspection in Alexandria --
 9 and August, was it 4th, that draft letter -- you had
 10 conversations with former election officials.
 11 A. And current. You left that out of your
 12 question.
 13 Q. I'm sorry. And in PILF Exhibit 7 it's
 14 August 5th.
 15 A. Yeah.
 16 Q. So between July 25th and August 5th you
 17 had conversations with Ann Leider and Don Palmer and
 18 Cameron Quinn with regard to the reliability of the
 19 Cancellation - Declared Non-Citizen list.
 20 A. No, my discussions predated January -- or
 21 July 25th, among some of those, but were related to
 22 this very issue. I had been in ongoing discussions
 23 with other election officials around the Commonwealth
 24 regarding this problem.
 25 After I saw the list of Exhibit 6, Alexandria

1 declared noncitizens, I had subsequent conversations
 2 with a variety of individuals, among those you
 3 included, but probably also Clara Belle Wheeler.
 4 So there was a variety of individuals, both
 5 before and after obtaining the list in Exhibit 6,
 6 where I was gaining an understanding of what the
 7 problem was and what this list meant. It wasn't just
 8 two weeks, if that's your question.
 9 Q. So is it your testimony that you were
 10 aware of this specific list before the inspection on
 11 July 25th?
 12 A. I was aware that there was available a
 13 list of people who had been declared noncitizens
 14 prior to my inspection on July 25th.
 15 Q. Okay. And how did you come to that
 16 awareness?
 17 A. Because a variety of election officials,
 18 both former and current, told me that there were
 19 records related to this line of inquiry that were
 20 available, if they were asked for.
 21 Q. Did they tell you this via email?
 22 A. I don't remember.
 23 Q. Did they tell you this via letter?
 24 A. Prob -- it was certainly not letter, no.
 25 It would have been written records.

1 Q. So this would be a conversation that you
 2 had?
 3 A. For sure there would have been
 4 conversations.
 5 Q. Okay. And when did these conversations
 6 take place?
 7 A. I don't remember specifically.
 8 Q. And who did they take place with?
 9 A. I already answered that question.
 10 Q. No, these conversations that alerted you
 11 to the specific declared noncitizens --
 12 A. It wasn't this specific -- okay. I'm
 13 sorry.
 14 Q. Okay. So my question is, were you aware
 15 of this specific record, the Cancellation - Declared
 16 Non-Citizen record, were you aware of this record
 17 before the inspection on July 25th?
 18 A. I was aware that such similar records,
 19 substantially similar records as the one produced in
 20 Exhibit 6, existed if they were asked for, yes, from
 21 election officials around the Commonwealth because of
 22 my conversations with them.
 23 Q. Right. And who specifically --
 24 A. I've answered that question.
 25 Q. So Cameron Quinn specifically told you

1 that this kind of record existed.
 2 A. I gave you a list of some of the people
 3 that I spoke with in an ongoing effort to learn about
 4 this issue. Cameron Quinn was one person that I've
 5 had conversations with about noncitizen records.
 6 Q. Understood. And my question is, did
 7 Ms. Quinn tell you that this is -- that this type of
 8 record existed before July 25th?
 9 A. I don't have a specific recollection of
 10 that. Remember, Cameron Quinn was the general
 11 registrar for the largest county in the state -- in
 12 the Commonwealth, and she very much told me that
 13 there were written records detailing noncitizens that
 14 were available for the asking, yes.
 15 Q. Did anyone else besides Ms. Quinn?
 16 A. I've answered that. Don Palmer and I had
 17 discussions about the availability of noncitizen
 18 cancellation records. Don Palmer was the state
 19 election director for the Commonwealth of Virginia,
 20 and I found his assessments to be inherently
 21 reliable. There were others.
 22 Q. But right now only Palmer and Quinn are
 23 those that you can recall?
 24 A. No, that's not my testimony. I've told
 25 you two other names. Ann Leider is one, Don Palmer,