

1 I mean, I don't know.
 2 Q. Well, you do know that Middle Resolution
 3 helped with data analysis for the Alien Invasion
 4 reports, correct?
 5 A. I do now. I didn't then.
 6 Q. Who is Chris Wright?
 7 A. I have no earthly idea.
 8 Q. And do you see --
 9 A. Right as I sit here, I mean, I couldn't
 10 tell you who that is. I don't know.
 11 Q. Chris Marston is on this email chain as
 12 well?
 13 A. That's what it says.
 14 Q. Okay. And you provided a report for this
 15 webinar; is that right?
 16 A. I don't know.
 17 Q. Well, you said --
 18 A. I remember talking about it, but -- when
 19 you say "a report," I assumed you meant some sort of
 20 written document for the webinar. I suspect you may
 21 have meant something else now.
 22 Q. Well, what do you recall from this event?
 23 A. Okay. I recall almost nothing about what
 24 anybody said. I have some recollection, because I
 25 think I went first, I got off the call as fast as

1 possible. I remember that. I know that I didn't
 2 stick around for the whole show. I remember that.
 3 I recall talking in generalities about the
 4 sort of issues going on in the Commonwealth and
 5 noncitizen registration voting. And I recall that it
 6 was at night or later in the day, that it was close
 7 to being dark outside, and being thankful that I was
 8 not on for the whole call. That's what I recall
 9 about it.
 10 Q. And according to the agenda, there's an
 11 agenda line for legislative possibilities for
 12 Virginia's 2017 General Assembly.
 13 A. Where is that? Right, it says that. I
 14 don't think that was one of my topics, but ...
 15 Q. And then election lawsuit -- election law
 16 lawsuits current and planned, and there seems to be a
 17 bullet with your name underneath that.
 18 A. Yep.
 19 Q. And then there seems to be maybe some
 20 bullets with respect to Landmark Legal Foundation.
 21 A. Really? Where? I don't see those.
 22 Q. The next page.
 23 A. Oh, right, okay. Hmm ...
 24 Q. And then there's a bullet RPV (Ed
 25 Gillespie)?

1 A. That's what the document says.
 2 Q. Do you know what that's with regard to?
 3 A. No, because I hung up on the call. I
 4 didn't participate after I was done.
 5 Q. Okay. And there's another bullet with
 6 Virginia Voters Alliance?
 7 A. The document says that.
 8 Q. What was the purpose of this call?
 9 A. Well, I can tell you what my purpose was.
 10 Q. What was your purpose?
 11 A. My purpose was to grant Reagan's request
 12 that I talk to his webinar and be out of the call as
 13 quickly as possible with minimal amount of imposition
 14 on my time, and my purpose was to hang up as quickly
 15 as possible after I satisfied that initial purpose.
 16 Q. Who is John Mashburn?
 17 A. Where does it say John Mashburn?
 18 Q. You can put that document aside.
 19 A. Oh. You're not asking me about this
 20 document.
 21 Q. No.
 22 A. Okay.
 23 Q. Do you know a John Mashburn?
 24 A. I do.
 25 Q. Who is he?

1 A. He's an individual. He's an attorney.
 2 What else do you want to know?
 3 Q. Was he a member of the Trump campaign in
 4 September of 2016?
 5 A. Probably, but I can't say with absolute
 6 certainty. If you had a document to refresh my
 7 recollection, I could answer with greater precision.
 8 (Adams Exhibit 42 marked for
 9 identification: Email correspondence
 10 from (topmost) C Adams sent 9/8/2016
 11 PILF-ADAMS-0039730)
 12 Q. The court reporter has marked and handed
 13 to you what's been marked as Exhibit 42 with Bates
 14 number beginning 39730. Do you recognize this email?
 15 A. Not yet. Okay. I see the email.
 16 Q. It's an email from you dated September
 17 8th, 2016 to John Mashburn?
 18 A. That's what the email says.
 19 Q. Okay. Do you recall this email?
 20 A. Not with a high degree of effectiveness,
 21 but ...
 22 Q. You don't doubt you sent it?
 23 A. Oh, no, not -- if you're producing this to
 24 me and representing it as an email I sent, I'm not
 25 going to think that you would sink to such low depths

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1 to give me a fraudulent email. So, no, I have no
 2 doubt that you have said it.
 3 Q. It certainly came from your production.
 4 A. So ...
 5 Q. The subject line is "Hans' latest:
 6 Virginia aliens on rolls -- thousands." That's the
 7 subject line.
 8 A. That's what it says.
 9 Q. And it appears to be an excerpt, and then
 10 linked to -- an excerpt of and linked to something
 11 Mr. von Spakovsky wrote; is that right?
 12 A. Well, it says "Hans' latest," and that
 13 would be the sort of thing I would say if I was
 14 sending something to somebody with an article that
 15 Hans wrote. So I have no reason to disagree.
 16 Q. Do you know why you sent this to
 17 Mr. Mashburn?
 18 A. Probably because I liked his article.
 19 Q. Hans' article.
 20 A. Right.
 21 Q. But why would you send it to John
 22 Mashburn?
 23 A. Because we have a long history working
 24 together on these issues.
 25 Q. What's that history?

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1 Q. Okay. But what from my question would you
 2 take issue with?
 3 A. Well, I don't remember.
 4 Q. Okay.
 5 A. You asked me a question. I don't remember
 6 the answer.
 7 Q. I just wasn't sure if you were taking
 8 issue with the characterization.
 9 (Adams Exhibit 43 marked for
 10 identification: Email correspondence
 11 from (topmost) C Adams sent
 12 11/26/2016 with attachment
 13 PILF-ADAMS-0039499 - 0039680)
 14 Q. I've handed you what's been marked as
 15 Exhibit 43 with the beginning Bates number 39499.
 16 A. Okay. I have the document.
 17 Q. Do you recall receiving this email from
 18 Stephen Miller on November 25th, 2016?
 19 A. I do.
 20 Q. Do you know why he emailed you?
 21 A. On this particular date?
 22 Q. Correct.
 23 A. I think I knew at the time. It has
 24 something to do with the context of this particular
 25 email this date, but I don't remember sitting here

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1 A. Well, he worked -- he worked on a number
 2 of cases with me in this area.
 3 Q. What cases?
 4 A. ACRU vs. Zavala County, Texas. There's a
 5 case.
 6 Q. And he was part of the Trump campaign at
 7 this time?
 8 A. I don't know. You've asked me that, and
 9 this email doesn't refresh my recollection as to --
 10 obviously I didn't send it to a Trump email address,
 11 so there is the possibility that he wasn't. Had this
 12 been sent to JohnMashburn@TrumpPresidentialCampaign
 13 dot whatever, then that would be conclusive that he
 14 was a member of the Trump presidential campaign. I
 15 just don't know.
 16 Q. You can put that document aside.
 17 A. All right.
 18 Q. In November of 2016 you responded to an
 19 email from Stephen Miller at his Trump campaign email
 20 address and sent him Alien Invasion I, correct?
 21 A. If you have that document to refresh my
 22 recollection. I would take issue potentially with
 23 some of your characterization, but I'm sure the
 24 document would refresh my recollection. I don't
 25 remember.

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1 today.
 2 There was some context, and it might have been
 3 the day after Thanksgiving, and something might have
 4 been in the news, but that's the best I can remember
 5 sitting here.
 6 Q. His email is very short. Subject line,
 7 "Vote Fraud," the body says, "can you send some info
 8 on noncitizen voting."
 9 A. That's what it says.
 10 Q. And then you respond on Saturday, November
 11 26th, with two documents attached, right?
 12 A. Well, I disagree with your
 13 characterization, because it doesn't make sense that
 14 I would have sent the declared noncitizen lists.
 15 Q. I'm not sure I understand.
 16 A. Well --
 17 Q. I said and you responded on Saturday,
 18 November 26th with two documents attached. What's --
 19 what's there to disagree with?
 20 A. Well, I think your inclusion of a variety
 21 of pages to Exhibit 43 were not part of what I would
 22 have sent him.
 23 Q. Okay. We're not even there.
 24 A. Well, you asked me about the attachments,
 25 and I'm answering you.