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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.