

1 A. I'm not aware of that.

2 Q. Let's go to page 8 of the report.

3 A. I'm looking at page 8.

4 Q. On page 8 there is a reference to
5 Bedford County.

6 A. I see that.

7 Q. It says: "Bedford County, a
8 relatively small rural county in Virginia with
9 only 60,000 individuals of voting age, also
10 provided a list of 35 noncitizens that have been
11 removed from their voter rolls."

12 Do you see that?

13 A. I see that.

14 Q. Is there any notation in here that
15 PILF had information that 18 of those 35 had
16 reregistered to vote?

17 A. I don't see that in here, no.

18 Q. You can put this document aside.

19 Now, PILF followed up with a second
20 Alien Invasion report, correct?

21 A. We published a second Alien Invasion
22 report.

23 Q. So the first one was published around
24 September 30th of 2016, correct?

25 A. Correct.

1 Q. She states in the last sentence: "I
2 have noted on the voter cancellation forms if the
3 voter responded after the 14-day window and
4 reregistered either in Bedford County or some
5 other locality." Correct?

6 A. That's what it says, yes.

7 Q. Do you have any basis to believe that
8 Mr. Moser didn't reregister?

9 A. I don't have any basis to believe that
10 he didn't reregister.

11 Q. And when he reregistered, he would
12 have had to affirm his U.S. citizenship, correct?

13 A. That's a requirement that he do that.
14 I have no basis to believe that he did or did
15 not.

16 MR. LOCKERBY: When we get to a
17 convenient stopping point, could we take a
18 break? Among other things we owe an answer
19 on something. We need to confirm that.

20 MR. TEPE: Yeah, we'll take a break in
21 a short little while.

22 BY MR. TEPE:

23 Q. One of the other records that
24 Ms. Gunter provided is a copy of that
25 cancellation report, correct? If you go to