

1 THE WITNESS: I don't know in which
2 way that would be more advantageous.

3 BY MR. TEPE:

4 Q. Well, do you think it would be more
5 advantageous to release the report the Tuesday
6 after Memorial Day or on Memorial Day?

7 A. Advantageous how?

8 Q. In terms of enabling other people to
9 see the release of Alien Invasion II.

10 A. In my opinion, I think that releasing
11 something on a major holiday would be less
12 advantageous if your goal was to increase
13 viewership.

14 Q. And PILF's goal was to increase the
15 number of people who viewed the Alien Invasion II
16 report, right?

17 A. I would say that was one of our goals.

18 (Exhibit 26 marked for identification
19 and attached hereto.)

20 BY MR. TEPE:

21 Q. The court reporter has handed you
22 what's been marked as Exhibit 26, a document with
23 Bates number 37501.

24 Do you see that?

25 A. I see that.

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

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.

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

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.

1 BY MR. TEPE:

2 Q. You said that you expected to find
3 high numbers of purported noncitizens on the
4 voter rolls. Am I understanding you correctly?

5 A. Yes.

6 Q. What was the basis of that
7 expectation?

8 A. I believe we were aware of a smaller
9 investigation that had been done in Alexandria on
10 this very same issue, and based on that small
11 example we extrapolated statewide. We figured
12 the number would be quite high.

13 Q. So what you're saying is if the
14 numbers that you received from Alexandria were
15 accurate and you extrapolated that statewide, you
16 would expect to find high numbers of purported
17 noncitizens. Is that what you're saying?

18 A. That's what I'm saying.

19 Q. Now, you wanted to get above 5000
20 purported noncitizens, correct?

21 MR. LOCKERBY: Object to the form.

22 THE WITNESS: At some point in time I
23 believe that became notable.

24 BY MR. TEPE:

25 Q. Notable for the same reasons 1000 was