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[00:00:01] **Speaker 1** Everyone, please have a seat. You started in the second. You are needed. All right. So everybody here. Her service is 21 CV 2440 American oversight versus Romney's loss at all. Good afternoon, gentlemen. Regarding our first last year not sure and on some legislation is knowledge non American and as well as Europe. All right. Thank you all for the response.

[00:02:00] **Speaker 2** Good morning, Your Honor. Rod said to his own peers on behalf of the respondents and Your Honor, Todd wrote in, I got Mr. Cable.

[00:02:08] **Speaker 1** Okay.

[00:02:09] **Speaker 2** Good morning, Your Honor. James Oakley also here in the heart of the Civil War.

[00:02:13] **Speaker 1** All right. So we are here on the motion for south the court. We did issued an order indicating and setting up this hearing, indicating that the court wanted to hear by way of affidavit and or testimony from Mr. Adelman as to exactly what the procedures were and what records were or were not kept. I did receive this affidavit this morning or received the response by American oversight. Does American oversight think that the affidavit is sufficient, knowing I was involved in questions in questions that we believe are going on over. All right, Mr. Campbell, please. Come on.

[00:03:04] **Speaker 2** Your Honor. Your Honor, where we began is that we're all on the same page. Sure. Thank you. Now, one of the things we did in the last year is the court said it wanted to add that the first debate that.

[00:03:16] **Speaker 1** For.

[00:03:17] **Speaker 2** The petitioner said that it was their right to issue a subpoena. That's why the court asked the parties to agree as to what information was needed for us to be able to have a we met and conferred with petitioners on that and we reached an agreement as to what is being provided. I was a little concerned by petitioner's filing that indicates if he wants to go into areas that were not identified as being requested in the out of a and so I want to assure the public about what scope that we're talking about here today and what the timeframe we're talking about. Because when I look at the agreed upon and this is title questions to be answered by being in an affidavit, I believe every one of those certain different aspects have been addressed in the affidavit. Testimony from Mr. Newman rubbish in his deposition wasn't listed in there aspects of obviously moreover were not listed as so it would be required into. And more importantly Mr. Newman approach. And even though it is his involvement with the Office of Special Counsel here after the period of time that we're talking about here, which is.

[00:04:36] **Speaker 1** July.

[00:04:36] **Speaker 2** August of 2021, not in my brain, when he was an employee of the Office of Special Counsel. So I want to be clear on that. Part of that second part is I want to be clear also that we're not here on the job. We're here on Purge.

[00:04:53] **Speaker 1** Right. What I already found from the respondent himself, this is not the first time.

[00:05:00] **Speaker 2** And so we have filed with the court our response on the purge. And we have done our best to outline for the court all of the issues and all of the facts that for this reason, the passenger air to air, the documents that were so so we filed affidavits from myself as a as a standard just before we went into court that the again is the 25 one, we submitted 27,000 pages of e-mails. That was done by a search of the archive back up in the Legislative Technology Services Bureau. So we have done our best to provide more with all the information that it required. And I say that because I believe that the issue here is whether our order is that complied with, and I do, that's an issue between us and the court. So I would propose that if there are questions, the forecast that is asked, the questions are being asked, and that Midwesterner has followed questions that she be allowed to ask, follow the question. But I want the court questions to be answered directly so that the court understands that we have done all that we can do to comply.

[00:06:20] **Speaker 1** All right. Well, let's break that down. The first thing is this agreement regarding the subject. It has not been filed with the court as far as the questions or areas that. The affidavit is supposed to cover the.

[00:06:34] **Speaker 2** Attack and what it is you are.

[00:06:38] **Speaker 1** All right, let me pull it up. Kirk, any response to the arguments from the respondents? Yes, I think that is your father's concern about overcapacity, and you should just be able to ask it at any time that we don't intend to get into the personal, you know, verbiage we submitted to that deposition yesterday just to illustrate some understandings of the various offers are being given. We have reason to be very, very thorough, but our questions are all very broad. Dispute your office 21, 20, 21 time. Right. And there are gaps in the affidavit that we have or that are not match up to all of the subject matter. In the letter that we submitted to the questions back on June 14 is that the affidavit definitely has to address some of the questions that have come up in the course of this piece where we've shown or at least activities for the divorce, that they were never produced in the affidavit. It doesn't address those either generally or specifically. Okay. I do agree that it appears that the other gentleman that was working at the Office of Special Counsel apparently was hired after this relevant time frame. And I'm not going to attempt to pronounce his name because I.

[00:08:34] **Speaker 2** Never allege.

[00:08:36] **Speaker 1** That he is me. But I do think it is inappropriate. I'm trying to recall time difference, that list of questions. I think that those are, I would say, proper areas of asking questions to supplement the affidavit. The affidavit is. And I would love American oversight to start the car payments proportion to what the purpose of today is to determine whether or not the first condition is either that and I want to play this for us or at all as to what occurred, what efforts were taken to serve reference find records found already or found, but the records and categories that can be searched. I do recognize in the affidavit that Mr. Gable then indicated that he didn't do any work from July 1st through August 30th. And that may be the answer, but I think for everyone sake, including the taxpayers of the state who have been waiting to find out if or what records are there, I think we all have Mr. Gable answer some questions for us questions and then hopefully we'll be done with this. Okay. All right. Mr. Gallo, please come up for my class. Please raise your right hand. Do you swear or affirm the testimony you're about to give in this matter will be the truth, the whole truth, and nothing but the truth. In some states, the microphone is not speaking to the microphone. Just so my third word in your and this way so that no one needs to see me. All right. You make the. Yes, we're very turkey. Good morning, Mr..

[00:10:55] **Speaker 2** Morning as well. Citigroup.

[00:10:57] **Speaker 1** You were president of consoles hair color.

[00:11:00] **Speaker 2** Yes.

[00:11:03] **Speaker 1** And your eyeballs get a lot of the background because a lot of that stress affidavit you're hearing is related to this case. Okay. So nervous. Easy to see. Your boss in Wisconsin is a lead for workers. And he said all these contractors are pulling you in a care.

[00:11:24] **Speaker 2** Would you pull your microphone just about that?

[00:11:27] **Speaker 1** Sure. You know, this isn't open this case against your boss at the Wisconsin Assembly for workers and yourself. Is contractors letting you extend their rights? Okay. Your office did produce some records in response to this lawsuit in November of 2021, correct? Yes, it has been previously marked in this case. Is Exhibit three an evidentiary hearing in January. But if you review those records where they were provided to counsel for your house.

[00:11:59] **Speaker 2** Yes.

[00:11:59] **Speaker 1** Okay. So you're generally familiar with all this.

[00:12:02] **Speaker 2** And again, it's been a while. Yes.

[00:12:05] **Speaker 1** Okay. Over the last couple of months.

[00:12:09] **Speaker 2** Is that a while? But generally, yes. Okay.

[00:12:15] **Speaker 1** In response to the Court's consent order on March 30th. Directed at the respondents here, you had a request from Mr. Foss and his representatives to test your partners again. Is that right?

[00:12:29] **Speaker 2** Yes.

[00:12:31] **Speaker 1** Did they at that time ask you what markers you had?

[00:12:36] **Speaker 2** Yes.

[00:12:37] **Speaker 1** Do they ask you? Raise your nervous.

[00:12:43] **Speaker 2** I don't have a specific recollection of that.

[00:12:47] **Speaker 1** Did you get from them any instructions on how to search for the records that your office possessed from that June to August 2021 period?

[00:12:57] **Speaker 2** I don't remember any specific instructions.

[00:13:00] **Speaker 1** Did they provide you with search terms use?

[00:13:04] **Speaker 2** We had the search terms, yes.

[00:13:06] **Speaker 1** From them. Or did you make your own list?

[00:13:11] **Speaker 2** What we would we would have been trying to look for whatever records and documents they wanted us to use. That's what I would have used, whatever they needed.

[00:13:22] **Speaker 1** Did they give you a specific list of search terms used or did they just point you to the records request to take find this material and let you come up with the search terms?

[00:13:32] **Speaker 2** You know, we're talking this is March. No, November was the first. And then April was the second night. I don't I don't remember if they gave me a list or if I just used the list that you had submitted.

[00:13:50] **Speaker 1** And I did not submit a list. Are you referring to the open records requests themselves?

[00:13:56] **Speaker 2** Yes. Okay.

[00:13:58] **Speaker 1** And the mystery box about this or anyone associated with this person, simply ask you where to search, whether it's hard, popular type parties like that. Or was that up to you?

[00:14:10] **Speaker 2** They just told me to look for all of the documents, all the responsive documents.

[00:14:15] **Speaker 1** And have a school in November of 2021 and then in the March-April timeframe. Yes. Yes. I want to go through a few reports that American oversight has filed at various times in this case that weren't in that bunch of documents submitted in November of 2021, just to understand what might have happened to these records. So you may have returned with a few of these staffers. You guys do these these boxes and there's be this sort of this market, as did it to back in January. Otherwise, any copy for everybody. Oh, that's not. So this has been previously marked dark in the study which also.

[00:15:17] **Unidentified** Documents in this case.

[00:15:29] **Speaker 1** Please let me know when you've had a chance to review the document. Address your name on.

[00:15:37] **Speaker 2** Okay.

[00:15:40] **Speaker 1** Is this an email that you offer to Marilyn and others in August of 2021?

[00:15:47] **Speaker 2** Yes.

[00:15:50] **Speaker 1** Did Mr. Abbas ever ask you about his record when you were looking for when you refused you records of his contractors in that summer of 2020? You are carrying.

[00:16:03] **Speaker 2** Additional regards to the midterm revision. Mr. Boss had contractors.

[00:16:10] **Speaker 1** All right. I believe you're referring to the Wisconsin state. So we have.

[00:16:15] **Speaker 2** Characters, correct?

[00:16:18] **Speaker 1** We have an understanding. Here is a question.

[00:16:21] **Speaker 2** To Mr. Vos.

[00:16:22] **Speaker 1** Someone asked you about this record at any time.

[00:16:26] **Speaker 2** Not that I recall.

[00:16:28] **Speaker 1** Did you ever produce it to him as a record or anyone associated with the Wisconsin Assembly? Is it contractor's record in response to American oversight requests in this case?

[00:16:40] **Speaker 2** Not that I recall.

[00:16:42] **Speaker 1** This this afternoon, this e-mail that appears to be sent from Yahoo! E-mail account. Is that right?

[00:16:49] **Speaker 2** Yes.

[00:16:51] **Speaker 1** And is that the only e-mail account you were using in this June, July, August 21 time period?

[00:16:58] **Speaker 2** Actually, the mischaracterization was toward the end of June.

[00:17:03] **Speaker 1** Well, all right. Wait a second. So your found some kind of check or. Excuse me, counsel from this father's counsel. Overall, since we have been given that point, your contract with the assembly started in July of July 1st of 2021. Correct.

[00:17:22] **Speaker 2** As far as coordinating attorney, yes.

[00:17:25] **Speaker 1** Did you do any work on the election investigation in advance in anticipation of that contract being to turn on July 1st? Now this is in it to be obtained from the Office of Special Counsel in December of 2021. Do you still have access to your outlook.com, your email account at that time?

[00:17:55] **Speaker 2** I don't believe so.

[00:17:58] **Speaker 1** And why is that?

[00:18:00] **Speaker 2** Well, we got a lot of criticism in the papers and everywhere for using the Yahoo! Account. Our office said it was a security breach of security risk. And so. I switched to. Well, first of all, I did give an office. I mean, we did get computers. Then we had a government e-mails. But in July and August, I was I had no funding, and I was just on my own. So once we once we got in office, we switched to the government.

[00:18:38] **Speaker 1** Here's the view. The question, though, is, do you still have access to your Yahoo! Account at that time after August of 2021?

[00:18:50] **Speaker 2** I don't I don't remember the exact time that I switched to a Protonmail account that was after. It was a very busy Yahoo! So I don't know that I didn't know about it.

[00:19:06] **Speaker 1** Have you tried to recover or have access to your Yahoo! Account at any time since August of 2021?

[00:19:14] **Speaker 2** That account has been discontinued. So I can't.

[00:19:19] **Speaker 1** Go back. That's your understanding?

[00:19:22] **Speaker 2** Yes.

[00:19:23] **Speaker 1** Have you conferred with tax support or anybody to try to retrieve the emails from your Yahoo! Account?

[00:19:30] **Speaker 2** I don't have any tech support.

[00:19:32] **Speaker 1** So that's enough. Did you make any attempts to see all of the emails on your Yahoo! Account that related to the election investigation before you discontinued the account?

[00:19:50] **Speaker 2** Yes.

[00:19:50] **Speaker 1** And what did you do to save them?

[00:19:53] **Speaker 2** I printed documents on anticipation of open records requests so that we'd have them somewhere to be. All of them ready to go.

[00:20:03] **Speaker 1** It happens to you regardless of whether they have been requested or not? Or do you only say ones that you believe had been requested?

[00:20:12] **Speaker 2** No. Is it related to. At that time. To the attorney, we're talking about July and. Right? Correct. So then, yes, everything that I would have had, I was trying to save some.

[00:20:32] **Speaker 1** And this email was yahoo.com. But it is one of the activists who created this exhibit to go, okay. And you don't recall ever providing it to Mr. Ross? Besides the S.S., I'm here. True. And did you contact Yahoo's tech support in order to try to retrieve any other emails you might have overlooked? No. This email in the body of the e-mail refers to research and interviews that you did in the course of your work on the election investigation. I did research chemotherapies and interviewing experts.

[00:21:17] **Speaker 2** To tell you where you're at.

[00:21:19] **Speaker 1** Sure. M.D. Why the rush?

[00:21:23] **Speaker 2** I did not bring my glasses. Excuse.

[00:21:29] **Speaker 1** I can read it for you if you would like. That's.

[00:21:36] **Speaker 2** Would you please? Yes.

[00:21:38] **Speaker 1** The paragraph of sentences. I have been researching other methods and interviewing experts in the field who say they can provide.

[00:21:46] **Speaker 2** You as you please read the paragraph so I can know the context of.

[00:21:52] **Speaker 1** Peter, why don't you borrow my glasses right here. That's all right.

[00:22:00] **Speaker 2** Commissioner Gordon. She was. Yes, I have read it.

[00:22:21] **Speaker 1** Okay. In our response to the open records request American oversight has made. We have not received even any research or interviews that are referred to this paragraph or otherwise. Did you keep records of this research in these interviews? At this time in August of 2021.

[00:22:42] **Speaker 2** I have no such records.

[00:22:47] **Speaker 1** You didn't keep any records of the research or the interviews you attended in July?

[00:22:52] **Speaker 2** When I was doing the research, I remember I didn't know this job was coming. And so a few days before July, when I started in my job and for the next month or so, just to educate myself about all of the issues surrounding not just the November elections, but the coordinating attorney job was to look at all of the elections in 2020. So I had to come up to speed on election law. I had to come up to speed on the various issues that people were alleging, including the big one at that time, was that I had some interfered with the machines, and so I had to become familiar with how old the ballot processes were. So I tried to educate myself, using publicly available resources and talking to people who are knowledgeable on all of these issues.

[00:23:52] **Speaker 1** It is July and August of 2021 time period. You initially were paying for your work for that time period, correct? I was. Okay. And you didn't keep any documents of this background work? You said you had done.

[00:24:06] **Speaker 2** I have documents. Sure.

[00:24:08] **Speaker 1** And did you provide those to Mr. Voss in response to these open records requests?

[00:24:12] **Speaker 2** If they were responsive, I provided.

[00:24:15] **Speaker 1** What do you recall?

[00:24:16] **Speaker 2** Providing all the things that met the search criteria?

[00:24:23] **Speaker 1** For example, American oversight is requested for product. Did you provide any work product?

[00:24:30] **Speaker 2** I no, I don't believe so.

[00:24:34] **Speaker 1** And let's look at another document.

[00:25:10] **Unidentified** This is actually exhibit number one. I agree.

[00:25:57] **Speaker 1** Okay. Is this an email that you sent on August 1st to Karen and the president of the Arizona Senator, Symone Sanders?

[00:26:07] **Speaker 2** Yes, I.

[00:26:08] **Speaker 1** Did. This is usually after the thesis that one of your to the ballot initiative has ever asked you about the server.

[00:26:19] **Speaker 2** That I recall.

[00:26:20] **Speaker 1** Or did any of the associated with the Wisconsin Assembly ever ask you about this record?

[00:26:24] **Speaker 2** Not that I recall.

[00:26:26] **Speaker 1** You didn't produce it to him. Did you send their emails like this? In this July, August nine period to people in other states asking about the elections and investigations through the elections?

[00:26:50] **Speaker 2** No rejection questions. A yes or no? I'm not a big e-mail fan and. I knew that at some point there would be open records requests and I wanted to do my best to keep my personal away from the government. And I did my best. But in this early stage. I had to reach out to South.

[00:27:20] **Speaker 1** Did you text with to setting to e-mails, to text or message with other people from other states or organizations? The election investigation.

[00:27:34] **Unidentified** No, not that I recall.

[00:27:38] **Speaker 1** When you were doing research about the election process in July or August of 2021 period, that was the area of research. Yes. You keep a longer effort of your research. Did you ever talk to anybody on either of the presidential campaigns that were involved in the November 2020 election?

[00:28:07] **Speaker 2** Not that I recall.

[00:28:09] **Speaker 1** Do you have any emails or contacts with federal government election cyber security experts?

[00:28:18] **Speaker 2** I'm sorry, what.

[00:28:19] **Speaker 1** Did you email or text with cybersecurity experts who had expertize in elections?

[00:28:27] **Speaker 2** I'm sure I did, but I don't know that it was July and August.

[00:28:32] **Speaker 1** Because there's nothing you could do to find out.

[00:28:37] **Speaker 2** I don't believe that. I just saw.

[00:28:39] **Unidentified** The Wire, August.

[00:28:48] **Speaker 1** Did Mr. Walker or anyone associated with the Wisconsin Assembly asked you if you had there tested with me? We just discussed. I'm sorry if anyone did Mr. Lawson or anybody associated with the Wisconsin Assembly asked you if you had emailed or texted with the election officials in other states or cybersecurity experts, the people we just asked.

[00:29:15] **Speaker 2** No, not that I recall.

[00:29:19] **Speaker 1** Did they ask you who you communicated with at all? It is July, August three.

[00:29:27] **Speaker 2** I'm sure the speaker would have asked me. What I was doing. And I would have kept them informed. But. Was that what I would have told him? I would have told him I was researching and trying to try to become more familiar with who was more familiar with the issues surrounding the 2012 elections.

[00:29:53] **Speaker 1** Part of using caravans email address.

[00:29:59] **Speaker 2** Your Honor, I think that our objection we seem to be going way far afield of whether it is for science.

[00:30:08] **Speaker 1** Well, I think it goes to the time.

[00:30:10] **Speaker 2** To solve the problem. I think I think I had a telephone conversation with her, and I think she must've given it to.

[00:30:48] **Speaker 1** Now you say in your affidavit that you did provide an update to Mr. Voss in August of 2021, correct?

[00:30:56] **Speaker 2** Yes.

[00:31:00] **Speaker 1** And we market for you.

[00:31:02] **Unidentified** I have it for reference.

[00:31:13] **Speaker 1** Exhibit two. Here to. Has your boss or anyone associated with this house assembly ever ask you about this? Is our job is to responding to these requests from American oversight?

[00:31:51] **Speaker 2** Yes.

[00:31:52] **Speaker 1** When did they ask you about it?

[00:31:57] **Speaker 2** I know it's been for all.

[00:32:01] **Speaker 1** Your recall producing it to them in November of 2021.

[00:32:05] **Speaker 2** I do not.

[00:32:06] **Speaker 1** Recall producing it to them in March or April 20, 21. Your affidavit says that the only electronic device you were using is July, August, July, August 20, 21. Time frame, was that right?

[00:32:22] **Speaker 2** There were also computers at the Rural Public Library, and I believe that's a reference. And they have to do.

[00:32:29] **Speaker 1** Yes. Okay. So this is an email from your Yahoo! Account. This is effort to do this. Reposted attached is a letter on how do you prepare that letter? Was it taken out of your phone or did you do that at the library or some other place.

[00:32:45] **Speaker 2** At that time? Because I have no office, no money and no computer. But I was working in the early part.

[00:32:55] **Speaker 1** So there's that 20 minutes of this movie is better prepared for the library, is that correct?

[00:33:02] **Speaker 2** I would believe so, yes.

[00:33:05] **Speaker 1** What programs do you use? Microsoft Word or Fox or some other Google programs? Do you have any recollection of what you used?

[00:33:15] **Speaker 2** Whatever, whatever's on the library? If you.

[00:33:20] **Speaker 1** Did you. And did you sit out here?

[00:33:25] **Speaker 2** Not that I recall.

[00:33:28] **Speaker 1** Did you prepare any other reports? In Adelaide at the library.

[00:33:34] **Speaker 2** Yeah. Yes. Yes, I do.

[00:33:37] **Speaker 1** About how?

[00:33:39] **Unidentified** I don't know.

[00:33:43] **Speaker 2** And everything that I did that wasn't on my phone, I had to do it for sure.

[00:33:50] **Speaker 1** Why did you save those records electronically in any way? Know. The proper emails to the letters are being listed as exhibit to said. You in the last sentence. I would have expected this argument to be positive. While the investigation I've life is most preliminary as well as your teaching relative observation. You mean to say when they set them to produce it as an open records response, if it were to call them?

[00:34:31] **Speaker 2** No. What I meant was at that time, I believed that I was entitled to an this sexual assault with one side. Obviously, once I turned it over there, my employers are going to do whatever they want with this.

[00:34:48] **Speaker 1** That if I do this letter, a page to page three, then it will be. The pages are very different to the document. Asked about her reverse Year 2000 comeback in August for the Nelson Symposium over several days, in an interview with Dr. David.

[00:35:17] **Speaker 2** Yes.

[00:35:18] **Speaker 1** Did Mr. Ross ever ask you out after?

[00:35:24] **Speaker 2** Yes. We talked about.

[00:35:26] **Speaker 1** It. Was there anyone associated with this office ask you if you had generated any records on the course of that trip?

[00:35:37] **Speaker 2** Not that I recall.

[00:35:38] **Speaker 1** I haven't seen you take any notes at the podium.

[00:35:46] **Speaker 2** Probably.

[00:35:48] **Speaker 1** Did you receive any materials while you were there? Yes. And do you ever produce either of those or those materials? In response to our request that you.

[00:36:00] **Speaker 2** Might not have the times. No.

[00:36:03] **Speaker 1** And why would you have had them?

[00:36:06] **Speaker 2** Well, I went out there because I thought there was going to be some solid evidence. Chinese interference with the machines. I was very disappointed by the lack of substance. To back up those claims. And I was. Annoyed that I had gone out, especially as it turned out I had COVID. So anyway, I was I didn't find anything that I could use during that. So.

[00:36:45] **Speaker 1** So any markers that were generated or that could be deleted or discarded, is that correct? No. No. What happened to the notes?

[00:36:54] **Speaker 2** Well, I the records the notes I would have taken, I would have reviewed for myself. And I came to the determination that there was nothing there. And so I would not have done.

[00:37:16] **Speaker 1** Now you go with the taxpayer through that trip to South Dakota, right?

[00:37:19] **Speaker 2** Yes. Okay.

[00:37:33] **Speaker 1** He also had created a website that the July August timeframe related to the investigation FBI crackdown, is that right?

[00:37:45] **Speaker 2** I don't remember what times it was created in the house. Your wife.

[00:37:50] **Speaker 1** Did it. Did Mr. Ross or anyone associated with the Samson family ever ask you about that, saying the reference to responding to Americans requests?

[00:38:00] **Speaker 2** Not that I recall.

[00:38:04] **Speaker 1** This website and witness mark marked this exhibit three. It's actually a combination because it is mark three businesses in a private space. This is a proposition that is American voters say what you want the specifics in terms of where you are. This is the first time we'll be able to search for games that are parodies of this. This website is where I would say that. Yes. And another page. There are a number of boxes that say, you know, that to this 728 2021. Do you recall being in the office at first? Usually they use special counsel to receive complaints from members of the public regarding the 2020 election and this July 28 timeframe.

[00:39:22] **Speaker 2** No, I don't recall. Okay.

[00:39:25] **Speaker 1** As you recall, the procedural. No, you didn't ask your boss asked you to produce copies of these complaints to them.

[00:39:41] **Speaker 2** Not that I recall.

[00:39:42] **Speaker 1** That anyone would be associated with the Wisconsin Assembly asking you to produce those complaints that you received.

[00:39:49] **Speaker 2** Not that I recall.

[00:39:51] **Speaker 1** You recall there were no complaints and just the ones that were posted on the website.

[00:40:01] **Speaker 2** So I don't know.

[00:40:11] **Speaker 1** How do you employ somebody named Andrew Foster in the Office of Special Counsel? Is that right?

[00:40:18] **Speaker 2** Yes.

[00:40:21] **Speaker 1** We're going to show you a copy of the contract. And that has to do with Mr. Oscar de la here marking exhibit four. Well using that it you go to Arizona and some.

[00:40:47] **Speaker 2** I think Arizona was looking for through the end of August and then the next week. Most of. I know that because it was Friday the 13th when I got.

[00:41:07] **Unidentified** A few hours before.

[00:41:13] **Speaker 2** Okay.

[00:41:18] **Speaker 1** And is the thing you would agree this is a contract issue for senior officers, the special counsel and supervisor?

[00:41:26] **Speaker 2** I believe so, yes.

[00:41:28] **Speaker 1** So, you know, it's not saying that, you know, that is where our universe.

[00:41:34] **Speaker 2** I believe somebody else.

[00:41:36] **Speaker 1** Had a date on August 4 to 2021. These haven't been exploited. So you in this country or something like that?

[00:41:49] **Speaker 2** I don't know. As you pointed out, I did the same and wrote in our response.

[00:41:56] **Speaker 1** So if your testimony in your affidavit was, it was because there was a volunteer as of August 20, 21. That's right.

[00:42:04] **Speaker 2** Yes.

[00:42:05] **Speaker 1** The minister was or anyone associated with the services. So they are asking you about this letter from Mr. Foster?

[00:42:13] **Speaker 2** Not that I recall.

[00:42:16] **Speaker 1** Did anybody ever ask you about this discrepancy about officers versus September 1st or some other day when you started?

[00:42:23] **Speaker 2** I believe it came up in conversations with some of the attorneys.

[00:42:28] **Speaker 1** I was that.

[00:42:31] **Speaker 2** I know it happened recently for that.

[00:42:37] **Speaker 1** Either. I refer you to the contacts to this report you provide in response to hurricane oversight requests or contact records.

[00:42:46] **Speaker 2** I don't recall.

[00:42:50] **Speaker 1** What are your plans for the first time in August 2021?

[00:42:54] **Speaker 2** I don't believe so.

[00:42:58] **Speaker 1** You know, is are you all to confirm that?

[00:43:04] **Speaker 2** I'm sure the reimbursements from the clerk's office.

[00:43:08] **Speaker 1** And is that Roman holiday?

[00:43:10] **Speaker 2** Employee Yes.

[00:43:19] **Speaker 1** Our mother. What we're doing and we'll do this in 24 hours. And, you.

[00:43:30] **Speaker 2** Know.

[00:43:32] **Speaker 1** You wonder what he's thinking. Seven. Marking exhibit number five. Mr. Damon, you recognize this? These are the five as invoices. And sitting in your offices in the fields where.

[00:44:30] **Speaker 2** I see their mark in The Voice. You guys.

[00:44:39] **Speaker 1** And work elsewhere, essentially, where you have to be isolating to the isolation, correct? Yes. Well, at page three of this document is you. Peter. Peter. July 9th, perhaps this. In July. And then later on in August as well. Did you have officers there in August?

[00:45:08] **Speaker 2** I have a ten by ten room, I believe, starting in August.

[00:45:12] **Speaker 1** You didn't have any offices in or elsewhere in July?

[00:45:18] **Speaker 2** I don't believe so. It was six months and I think it was. We have moved by the desire to.

[00:45:26] **Speaker 1** Move your office rental about $700 a month at this time.

[00:45:30] **Speaker 2** I think so, yes.

[00:45:32] **Speaker 1** I'm looking at this argument in this case, and I'm prepared for office based from 12 by 2021 through 31st July 2021 for a positive order, $54.40. It is. Refresh your recollection of the relaxation in July.

[00:45:51] **Speaker 2** Yes, it does.

[00:45:52] **Speaker 1** And what's your answer?

[00:45:53] **Speaker 2** I have attended right side of the room.

[00:45:57] **Speaker 1** In July as well as.

[00:45:59] **Speaker 2** Part of July.

[00:46:01] **Speaker 1** I what are you doing at that time for your office space?

[00:46:08] **Speaker 2** Well, that's a printout of documents. As I rode Prince outside. He was. I would want the police to review them so I might be a little more private. I want the ten year old people there.

[00:46:31] **Speaker 1** Zurab Putin indicates that you didn't have an office for the first couple of months. My role as special counsel on page three for. Or is that incorrect?

[00:46:41] **Speaker 2** It is.

[00:46:44] **Speaker 1** What are you doing? First you need Mr. Ross to grab you or Mr. Observer enlisted as he decides to do so. Only ever ask you about whether I did this piece or. Obviously, I just.

[00:47:02] **Speaker 2** Not that I recall.

[00:47:05] **Speaker 1** Did you ever cry? He's abusive in response to requests for records from her website.

[00:47:14] **Speaker 2** I don't know.

[00:47:20] **Speaker 1** You saw it in July, and I was hired by your office for records in response to those requests. What did you did you search the documents in your office space at any point in response to American overseas requests?

[00:47:38] **Speaker 2** Yes. Okay.

[00:47:39] **Speaker 1** And did you do that in July and August of 2021?

[00:47:47] **Speaker 2** I believe so.

[00:47:50] **Speaker 1** You can't recall it in the way that you think you might have.

[00:47:53] **Speaker 2** If it had been required. I would have done.

[00:47:58] **Speaker 1** Did they provide you copies of the open records request July and August of 2021?

[00:48:03] **Speaker 2** I believe so.

[00:48:04] **Speaker 1** Do how did they transmit those to you? You know, I don't know. And you realize as taxpayers, with respect to this marketplace from July and August of 2021. Correct. Is easier to obfuscate in November of 2021 in response to the court's first order.

[00:48:25] **Speaker 2** Yes, we had a different office issued in October.

[00:48:29] **Speaker 1** And all of the records that were at your old office space get transferred to you.

[00:48:36] **Speaker 2** Yes.

[00:48:39] **Speaker 1** And the user shows activity in March-April of 2022. Yes. Some of the emails and activities that we just discussed, like this e-mail to Mr. Lee and the emails to the spam, as we discussed before, was sent to your house. Is that.

[00:48:58] **Speaker 2** Right? Yes.

[00:49:00] **Speaker 1** Your affidavit says that you served there in paragraphs 15 and 23. And let me repeat it. I mean, it said that you search your personal emails in November 2021 and April 2022 in response to requests from Mr. Your Boss's office, which personal email account would you have searched at that time?

[00:49:25] **Speaker 2** Whichever one was active. Whichever one I.

[00:49:28] **Speaker 1** Have. And is it is it your testimony that at that time it would have been the protonmail email?

[00:49:35] **Speaker 2** Objection. She refers to it. I heard. So you're saying at that time it's ambiguous?

[00:49:43] **Speaker 1** Yeah. In November of 2021, what happened in real time? Your email address.

[00:49:51] **Speaker 2** It could have been a delivery fault. The exact time switches.

[00:50:00] **Speaker 1** And in April of 2022 that personal email account users within that in the proton email I believe, and the personal email account was not one that you were actually using in July and August of 2021. That's true. Okay. So you are searching an email account for hackers that would have been created on that account at the relevant time period, but could have sent it forward and or something?

[00:50:28] **Speaker 2** Yes.

[00:50:36] **Speaker 1** Is this your boss's office or anyone associated with this house to simply ask you about your personal email accounts? Not that I recall. You recall they asked you for this personal account?

[00:50:51] **Speaker 2** I don't remember specific.

[00:50:58] **Speaker 1** If you delete e-mails off of your protonmail account.

[00:51:02] **Speaker 2** I'm sure I have.

[00:51:04] **Speaker 1** You tried to recover any of those.

[00:51:07] **Speaker 2** What time frame are we talking.

[00:51:10] **Speaker 1** In November of 2021 to start?

[00:51:14] **Speaker 2** Well, looking at all projection, we're talking about July and August.

[00:51:18] **Speaker 1** I mean, do you buy that for Mickey.

[00:51:20] **Unidentified** Mouse, too? That.

[00:51:25] **Speaker 2** Nothing from July or August.

[00:51:29] **Speaker 1** Broke out in April of 2022. If you tried to recover any e-mails you might have deleted from your Protonmail account in response to these requests.

[00:51:38] **Speaker 2** Yes.

[00:51:39] **Speaker 1** And how did that go? Nothing. Okay. How did you do those types of mercury to cover those deleted emails?

[00:51:48] **Speaker 2** Yeah.

[00:51:49] **Speaker 1** Okay. So that was just based on your own efforts?

[00:51:51] **Speaker 2** Yes.

[00:51:53] **Speaker 1** Do you have any training and recovery of deleted emails or documents? I do not. Using European users to email and messaging it calls on your personal cell phone. In response to this request, regulators say that you don't have the phone as it came after all of September of 2021. Did you have access in November of 2021 to the messages that would have been on your phone for July and August of 2021?

[00:52:30] **Speaker 2** I don't believe.

[00:52:32] **Speaker 1** In April of 2022 prior. Were you able to port your old data over from your old phone and your new phone? Have you made any attempts to retrieve to do that data from July and August of 2021?

[00:52:54] **Speaker 2** And it wasn't possible.

[00:52:57] **Speaker 1** And that's the reason why the understanding and your text messages that you might have used in July of 2021 around the use of the messaging service that was provided on the phone or that you use in other services like Signal.

[00:53:15] **Speaker 2** Well, it was I believe it was just.

[00:53:19] **Speaker 1** Okay. So at some point you did you signaled that you think that was later.

[00:53:23] **Speaker 2** At some point for a very brief time.

[00:53:25] **Unidentified** And I just like.

[00:53:30] **Speaker 1** Now you have the e-mails would have been available even with your phone crashing. Right. Because it's a cloud service or a web based service.

[00:53:38] **Unidentified** I believe so.

[00:53:47] **Speaker 1** I mentioned in your affidavit that there were three volunteer attorneys working here in August. If they were going to die on this time frame in your class, your own devices card. Ah.

[00:54:04] **Speaker 2** Yes.

[00:54:06] **Speaker 1** And they accompany you during your trip to Arizona to observe Arizona's recall. Is that right?

[00:54:11] **Speaker 2** Yes.

[00:54:13] **Speaker 1** How did you communicate with them in this time frame in writing?

[00:54:21] **Speaker 2** Either by chance or by.

[00:54:25] **Speaker 1** And only verbally.

[00:54:27] **Speaker 2** Yes.

[00:54:29] **Speaker 1** The email is for them.

[00:54:35] **Speaker 2** Probably.

[00:54:36] **Speaker 1** And they would have had personal accounts they would have been using at the time right through. How did they come to be volunteers for the period of the special counsel?

[00:54:51] **Speaker 2** I knew Andrew Carroll and I talked about my. They seemed interested in the subject matter as to what I meant. It was brother.

[00:55:10] **Speaker 1** And the members have to go to work, you know. You know, they have to get rid of any records from the trip to Arizona.

[00:55:23] **Speaker 2** Not there at all.

[00:55:25] **Speaker 1** Are you asking specifically for America's role, Patrick?

[00:55:29] **Speaker 2** Yes.

[00:55:31] **Speaker 1** You know the.

[00:55:32] **Speaker 2** Story. I've asked for records for the time period in July and August. So did I see them specifically? Including our time.

[00:55:47] **Speaker 1** Members haven't received any records of this peer review or from them. You know, if anything was ever created, those emails and anything like that probably helps. Okay. And how do you produce business? You know, do you still have those notes? No. I need you to start with those notes.

[00:56:12] **Speaker 2** Of a judge's role as skills are not writers. What do you mean? The law firm law writing pointers.

[00:56:20] **Speaker 1** And I think that's debatable. They're depending on what the notes saying. You. Can you tell me more about what your notes indicated?

[00:56:32] **Speaker 2** I brought out a ruling from the court.

[00:56:35] **Speaker 1** But perhaps the foundation question. How do I know that there are factors.

[00:56:41] **Speaker 2** That lead to the station house is trying to draw is one without distinction.

[00:56:46] **Speaker 1** Well, overall, you asked the question.

[00:56:51] **Speaker 2** If I took notes, they would have been for my personal reason to.

[00:56:57] **Speaker 1** Use those two to do anything else, like use them as a reference to emails or other business within the investigation.

[00:57:08] **Speaker 2** I'm sure I use the knowledge that I got in Arizona for future draft, but as far as I looked at these notes and relied on the particular notes, I learned a lot of things out there that just weren't applicable to the studies.

[00:57:24] **Speaker 1** That you described in your notes because you thought they were useful.

[00:57:27] **Speaker 2** You probably.

[00:57:30] **Speaker 1** Did. Did you send or receive any emails or text during your trip there related to your time in Arizona? Did you generate any other product aside from your notes?

[00:57:49] **Speaker 2** Is that question too great to serve time for any word from her?

[00:57:53] **Speaker 1** There's no. You say you're happy that you're in Arizona. Mr. Foster was around here sometimes. You guys went to Arizona. Your car with Arizona, is that right?

[00:58:08] **Speaker 2** RV Yes.

[00:58:09] **Speaker 1** Was there anybody else who was in Arizona? You know, I don't care your attention back to 2 to 3. There's a spreadsheet in the last few pages. It was an accident. American oversight as seen from the defense through your office and on the right, in your notes in any piece for Arizona, five people, five nice or three that tells Arizona, you know, that that person was there anybody.

[00:58:53] **Speaker 2** I'm sorry. Did you? So on the last day of.

[00:58:59] **Speaker 1** The year, on the second to last week about.

[00:59:18] **Speaker 2** Sue and Andrew and I flew down for a while here, and Ferrol came in from California.

[00:59:29] **Speaker 1** Yeah. All the person attending.

[00:59:31] **Speaker 2** There was nobody else. No, nobody else ever did.

[00:59:37] **Speaker 1** Okay. You are invited in for every single.

[00:59:43] **Speaker 2** One of this hotel. I just don't think that's right.

[00:59:50] **Speaker 1** Did Mr. Ross or anyone associated with the Wisconsin Assembly ever ask you all have that?

[00:59:56] **Speaker 2** I recall. There was the four of us.

[01:00:00] **Unidentified** Those on. Most of the person.

[01:00:06] **Speaker 1** Did anybody associated with the special counsel's office getting additional or certainly a superior or to offer proof? Are you still up in. If you're already associated with your office or are you associated with this missile system, whether you are excuse me, workers who this summer, 20, 21 time period. Not that I recall. You ever had a discussion with your representation?

[01:00:43] **Speaker 2** Yes.

[01:00:43] **Speaker 1** What was that discussion?

[01:00:45] **Speaker 2** I want to talk to as many different lawyers as I could to make sure that we have a policy that is in conformity with law and we have the practices.

[01:00:58] **Speaker 1** My practice is where are you following prior to August 31st as far as retention.

[01:01:03] **Speaker 2** Prior to August 30.

[01:01:06] **Speaker 1** Or August 31st?

[01:01:13] **Speaker 2** If I thought. If it was going to be something that was going to be used in the report. I said from the beginning, I wanted to make everything public. That we relied on in making the report as if there was if it wasn't going to be useful to the report, if there was no open records requests on point. Then I could discard it.

[01:01:41] **Speaker 1** Where did you find the energy that was permissible in this? By August two, 2021 time.

[01:01:48] **Speaker 2** Frame by reviewing the snapshots.

[01:01:51] **Speaker 1** That you from your own review.

[01:01:53] **Speaker 2** Yes.

[01:01:57] **Speaker 1** And if you inform any of the users here with the designs for the Assembly in summer 2021, that applies to practice revolving, not the recall. Do you ever cover any of that? You might even during that time frame.

[01:02:19] **Speaker 2** I want to search what we have on the search track. That's.

[01:02:30] **Speaker 1** Aside from your notes from those two groups, do you recall deleting or discarding together records in July 2021? Is might have that you just don't recall either way.

[01:02:45] **Speaker 2** Objectionable.

[01:02:45] **Speaker 1** For circulation. I just trying to understand. No answer, right?

[01:02:52] **Speaker 2** Should I tell the documents? Yes, I did.

[01:02:56] **Speaker 1** And what you recall the leading in July and August of 2021.

[01:03:00] **Speaker 2** If there was no open records request, it wasn't going to be useful to my report that I would probably do later.

[01:03:11] **Speaker 1** And useful to your record was absolutely determined by you based on what you thought was something you wanted to follow.

[01:03:20] **Speaker 2** Up on. Yes.

[01:03:23] **Speaker 1** So things that you got last very you would keep true. Now any time. Did you ask Mr. Foster these guys for what they did with their records? We're the ones who live in Iowa.

[01:04:05] **Speaker 2** I asked them if they had any and they said no.

[01:04:08] **Speaker 1** Did you let them know in July of 2021 that they didn't need to retain things that would be abused to the investigation?

[01:04:20] **Speaker 2** I don't recall the specific discussion.

[01:04:24] **Speaker 1** You had any discussion with them about retention.

[01:04:27] **Speaker 2** But the two did? Yes. That probably would have been the understanding that if they created something or if they took notes. And it wasn't going to be useful. And there was no open records request. And. I think it would have been my expectation.

[01:04:46] **Unidentified** That they would. Okay.

[01:05:03] **Speaker 1** All right. At any price, as the other requests for emergency funds were first issued to us or his staff, or even if he is only ever telling you how to behave. We're going to remind you of an absurd law.

[01:05:22] **Speaker 2** To tell me.

[01:05:23] **Speaker 1** That you without knowing your partner's law. Not that I recall. Did they ever tell you the contract would be terminated if you did happen to find out that I recall. Did they ever tell you that your services or your practices were not in compliance with the government workers law?

[01:05:43] **Unidentified** Not that I recall.

[01:05:49] **Speaker 1** So I understand the location where you might have documents in July and August of 2021. Do you use your office at that time in any documents that you created in the library and live Berlin? Do you save those documents on hidden varieties or anything like that? I don't know what that is. Oh, the library. Okay. Did you save them anywhere on a hard drive? External hard.

[01:06:19] **Speaker 2** Drive? If I needed them, I would have purchased them all.

[01:06:24] **Speaker 1** Did you use any other sort of cloud based service, like the need for Microsoft product category that. It was her ideas that were directly contradicted the entire 2021 with your candidate David shows your appetite for.

[01:06:54] **Speaker 2** No one was contracted in July.

[01:06:56] **Speaker 1** Or August and I'm sorry, but did you simply are you.

[01:07:01] **Speaker 2** The investigators?

[01:07:02] **Speaker 1** Yes.

[01:07:03] **Speaker 2** What was your reaction?

[01:07:05] **Speaker 1** There were some other investigators employed in this. I heard them. All right.

[01:07:10] **Speaker 2** I don't know how far into lawyers they went, but yes, during the time frame, there were two. One quit before I got out of the room. Before I got there, there were actually three.

[01:07:28] **Speaker 1** If you say your your ability to make healthy conversations with them, but not communicate by text. Is that right?

[01:07:42] **Speaker 2** Not that I recall.

[01:07:43] **Speaker 1** Do you live with them? I don't believe so. And is your understanding of what partners they have is out there? What is that right?

[01:07:58] **Speaker 2** You don't have any understanding.

[01:08:03] **Speaker 1** Just one last. Rookie exhibit number six. As soon as this came out from earlier this year with our e-mail address for whoever it was in the market released back to that Arizona audit office. Is that correct? Yes. And this e-mail address, this comment by special counsel will have heard that that was the order she shared with the Syrian government. Is that right?

[01:09:08] **Speaker 2** Yes.

[01:09:09] **Speaker 1** And we are very clear, you know, this is that, you know, at times the target of our special counsel, our. But when you were talking earlier about how you got government, you know, some corporate instigation, this is one of those how strange. So this is about an amended strategy for the Arizona trip and it says you deserve to have theirs and says there's nobody here in Arizona, five people for four days and four people for one day. And they are watching that. Who that person right.

[01:09:47] **Speaker 2** There was not that person.

[01:09:49] **Speaker 1** So was this statement incorrect?

[01:09:51] **Speaker 2** Yes.

[01:10:08] **Speaker 1** Were there any other investigators inside the satanic cage in the 4 hours before heading for.

[01:10:15] **Unidentified** The party room?

[01:10:23] **Speaker 2** You know, I didn't hire the investigators and not so. Not that I know.

[01:10:28] **Speaker 1** I think it is more associated with the classified employee. He hired somebody later on think in communications. And according to your testimony, the assembly and Assembly Committee that Senate occurs in 2021. Is that ever classified really? Prior to this time, I was 20, 20, 100. Okay. And is this a little classified?

[01:11:04] **Speaker 2** We're. We're working on that.

[01:11:06] **Speaker 1** We're working on that. Okay. This ain't nobody knows from this office who that person is. That's true. Last time. And is for us to support other people who were volunteering due to July 2021. Did it, Mr. Ross, or is anyone associated with Wisconsin Assembly Evers or whether they had any last minute resignation? Not that I recall. And you didn't have anybody directly employed to work in the investigation? I was I was at work.

[01:12:24] **Speaker 2** Right. There were two investigators that were hired before I got there. But other than that, that's true.

[01:12:31] **Speaker 1** Okay. And then everybody, you would be on in September, is that right?

[01:12:36] **Speaker 2** I believe so, yes.

[01:12:47] **Speaker 1** Because you are going to have an initiative to try to fix any of that.

[01:12:52] **Speaker 2** He had earlier, as I.

[01:12:55] **Speaker 1** Left on the PRISM question, sir, I just want to understand. So. In July. Little July. You left some space after a failed practice. All right, so you have the space for film of what was in that room.

[01:13:24] **Speaker 2** A table and some chairs.

[01:13:26] **Speaker 1** Okay. I do not have a personal computer.

[01:13:29] **Speaker 2** I don't.

[01:13:31] **Speaker 1** All right. So you're I believe you said you spent most of July researching various things that broke through the library number of years underground. Okay. And what what were you using to record books?

[01:13:52] **Speaker 2** They would be all right.

[01:13:54] **Speaker 1** Where are you taking any notes of the time you were researching? Probably, yes. And were those the type of notes that you you would print off on the computer?

[01:14:08] **Speaker 2** If I wanted the article, I would have prints and maybe I'd take notes on the articles.

[01:14:14] **Speaker 1** Okay. So you print out an article, you take notes on the article, and then you bring that back to the Perkins Review.

[01:14:20] **Speaker 2** Or wherever I was going. Yes.

[01:14:22] **Speaker 1** Okay. And is my understanding, at least from what you testified, that you had no previous knowledge of the selection of washing machines, and so you were getting up to speed on all of them.

[01:14:39] **Speaker 2** I did not have a very sophisticated or intricate understanding. So, yes, that is true.

[01:14:45] **Speaker 1** Okay. And so then at the end of July, the first open to request, request from American oversight is sent to the Assembly. And Speaker, did you get a copy of that American Oversight Public Records request that read that was dated July 20th. So then you attend. These two events in Arizona and South Dakota. In Arizona, there might be five people, but you don't believe there were. You think there was only four? There were four, but the hotel room was built for five. You know how that happened?

[01:15:37] **Speaker 2** I don't believe that was the case. I think I saw that Mr. Murrow, which said that to Mr. was wonderful. But I don't know how that number came. And we didn't rent. I paid for it with my own personal credit card. When we checked in. And it was important for.

[01:16:02] **Speaker 1** All right. So then you testify that you have these two trips. You don't know if you didn't think it was relevant. You believe in the crash or discarded, right? Yes. So is it fair to say that if you found something that didn't fit with what you were researching or thought was appropriate, you discarded those documents.

[01:16:39] **Speaker 2** If I didn't think it would be helpful. Yes.

[01:16:42] **Speaker 1** So what about the articles that you printed out and the news? Sure. The new Burleigh. Did you discard those as well?

[01:16:53] **Speaker 2** No. I believe they're all posted on the other.

[01:17:01] **Speaker 1** And. The report that you prepared was just a disservice to. How did you prepare this at the New Berlin Library?

[01:17:18] **Speaker 2** Yes.

[01:17:19] **Speaker 1** So exhibit two, was you typing this up at the New Berlin Library on their computer? Probably less. And what did you use to refresh your recollection to put this information into the exhibit? There have to be some bills or articles or something that you were using when you were preparing this.

[01:17:53] **Speaker 2** Report, right? I think so.

[01:18:01] **Speaker 1** And you know those who provide it to Speaker Bass or this.

[01:18:07] **Speaker 2** If it was responsive to the requests we would provide.

[01:18:17] **Speaker 1** And your affidavit indicates that between July 1st, 2021 and August 30th, 2021, I produce almost no substantial report because I was organized in the office. I was reviewing and analyzing issues to be investigated. My approach to investigation. I do not produce or save any work during this period. So for the first two months, you are simply getting up to speed on what you believe, your past or. What were you doing in those two months?

[01:18:58] **Speaker 2** What I was doing. I had been hired to be what they call the coordinator of the term. And there were two investigators that I didn't hire who we didn't know each other. I didn't. I'm trying to study these issues. I had a previously planned vacation the first week of July, family vacation for the remainder of July and trying to find the office space. I'm trying to find it for you.

[01:19:26] **Speaker 1** You had office space by the middle of July.

[01:19:28] **Speaker 2** Well, then I guess I was successful. Yes, I was looking for it. But then studying the issues.

[01:19:36] **Speaker 1** And those issues and issues that you were not an expert at.

[01:19:40] **Speaker 2** Correct? True. And then to answer your question. August comes around. So there's 20 business days in July, 20 business days. We're talking about the first week in Arizona, in the second week down in South Dakota. And on Friday, the 13th of August, I drive right from South Dakota to the emergency room operator Prater Urgent Care in Berlin, where I could eventually diagnose over the next two weeks solidly in bed. I got caught with very, very unpleasant symptoms. And then the third week, I'm half investors, half able to get up. So if you want to characterize this, no word that your shoes and.

[01:20:32] **Speaker 1** Clothing were eventually paid for.

[01:20:34] **Speaker 2** Yes, I was.

[01:20:37] **Speaker 1** All right. If you look at that one, that one, and then not been previously in the North American history class, the Bible that says 16,757 on the red under Yahoo! Account. Did you have quite a few unread e-mails on your know?

[01:21:05] **Speaker 2** I don't believe I know where it was.

[01:21:08] **Speaker 1** At the bottom. It says right where it says right about taken a little bit of a fall. My back is optimistic. I'll be back to speed in a day or two. This was dated August 17, and I'm right about that. It looks like there's 16,757 unread emails that you're doubtful now. Your email is a. Do you recall having that many unread emails?

[01:21:44] **Speaker 2** I do now.

[01:21:45] **Speaker 1** And you said that you stopped using Yahoo.com. What did you do to prevent you from going back and reviewing your Yahoo! E-mails even after you stopped using it?

[01:22:08] **Speaker 2** I'm sorry.

[01:22:10] **Speaker 1** Well, normally when you get a new email account, you still have access to your old you know, now you just say my new email account is that's because I have too much spam or I for whatever reason.

[01:22:26] **Speaker 2** Right.

[01:22:27] **Speaker 1** But you can still access your old you email account and you can specify that you were unable to do that, to search it. And I'm wondering how all that came about. What did you do to prevent you from being able to look at your old Yahoo?

[01:22:43] **Speaker 2** I'm unaware of a way to search or to just continue using.

[01:22:49] **Speaker 1** Or how to do this discontinue.

[01:22:55] **Speaker 2** You just asked somebody to come and visit.

[01:23:02] **Speaker 1** And I go down as a 3000, correct?

[01:23:06] **Speaker 2** Yes.

[01:23:07] **Speaker 1** So you just stop using it. You still have access.

[01:23:13] **Speaker 2** Naughty. And how was Scooby-Doo and Billy? Someone was helping me in my office.

[01:23:23] **Speaker 1** And wonders that I'm not going to do it at all. Was it after we had been after we opened records last July?

[01:23:34] **Speaker 2** Probably, yes.

[01:23:35] **Speaker 1** And prior to that time, no searches were done on that account prior to one time to the time. Believe it.

[01:23:47] **Speaker 2** Surgeons were not.

[01:23:48] **Speaker 1** Correct. You have the open records request. Did anyone prior to the leaving your Yahoo! Account go back and search your emails to determine whether or not available responsive to the open records?

[01:24:03] **Speaker 2** I believe so.

[01:24:04] **Speaker 1** Do you believe so? Who would have done that?

[01:24:08] **Speaker 2** Probably.

[01:24:11] **Speaker 1** And but you can't recall doing that.

[01:24:16] **Speaker 2** Do I specifically recall going back? I don't. But I would have looked at every e-mail account available to me, every device that that was available to me. I would look for any records.

[01:24:32] **Speaker 1** And what would you have done?

[01:24:35] **Speaker 2** Whatever I was saying.

[01:24:38] **Speaker 1** And when can you recall being ousted? But know the questions. You have a few follow up on. Those are material and you've indicated that you work with a junior at RS 13 to 2021 and badges to prove that you were solidly in bed for two weeks after that. What I'm looking at is a two year and as new cases as of August 20th, so that was probably greater for us. Do you get out of that and go to the library table of letters? And on August 20th.

[01:25:19] **Speaker 2** I don't want to.

[01:25:21] **Speaker 1** Did to the letter or email but said.

[01:25:26] **Speaker 2** This was Caroline. Oh.

[01:25:29] **Speaker 1** Yes, it is the letter that you thought you said that happened at the University Public Library.

[01:25:37] **Speaker 2** On August 17. Well, I was solidly in bed for two weeks after August 13. I know.

[01:26:06] **Speaker 1** So with those gates in mind, you know, where you had to write this letter went in and you had admissions that you deleted, things that you thought were not going to be useful to the investigation. Just to get a little better understanding of that in your answer to the core of that question were things that you knew to be useful, things that supported or related to the issues. And also this letter that's attached to it it's easier to.

[01:26:48] **Speaker 2** Caption has been sort of the same version quarter post I. Whenever I would help you write the report. That is what I tried.

[01:27:01] **Speaker 1** So things that supported this idea, for example, that divert money by inappropriately influenced by mirrors in the South by using satellites that he knew he.

[01:27:17] **Speaker 2** Yes.

[01:27:18] **Speaker 1** And it was something that went under that would contradict me without understanding. Without you. Something you wouldn't even know. How about the other mayors that got money? The other cities? I decided to keep records of all that.

[01:27:34] **Speaker 2** So don't keep records. About what?

[01:27:36] **Speaker 1** About other cities besides the five cities in that group or many of the other cities as well. Right? Right. Okay. Did you keep records of all the other cities?

[01:27:48] **Speaker 2** I was focused on the five. The 5.8 million out of the ten.

[01:27:53] **Speaker 1** Okay. And you, before I asked you about the annual column being deleted, you said it was deleted by someone in your office. Yes.

[01:28:04] **Speaker 2** I know. We were all I would ask whoever was there, but I don't know.

[01:28:10] **Speaker 1** Is there a document? You those is how you deleted.

[01:28:16] **Speaker 2** Dr..

[01:28:17] **Speaker 1** Yes.

[01:28:19] **Speaker 2** That. I know.

[01:28:20] **Speaker 1** Could you ask to find out?

[01:28:23] **Speaker 2** Sure.

[01:28:25] **Speaker 1** And do you know for certain that the converse in the reverse is that your status is suspended and it can still be a retreat?

[01:28:37] **Speaker 2** I believe it was the leaders, but I do. I have a certificate for me on the know.

[01:28:42] **Speaker 1** And you don't know who the person is who needed it. So here you can't ask them.

[01:28:47] **Speaker 2** I believe that it was a turning clause.

[01:28:53] **Speaker 1** And do you know when we would have done? That's right. All right. Any questions for this witness number? All right. Thank you. You may step down. We need to take a break now. I'm sorry, but I do have some time before we have to address the wait. Let's take a break. We'll address that and you can come back later.

[01:29:21] **Speaker 2** And then if.

[01:29:22] **Speaker 1** You're not on top, just stop the video right.

[01:29:30] **Speaker 2** Now. You're on as Mr. Gayle the next year or so.

[01:29:33] **Speaker 1** Yes. Yes.