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4     SELECT COMMITTEE TO INVESTIGATE THE  
5     JANUARY 6TH ATTACK ON THE U.S. CAPITOL,  
6     U.S. HOUSE OF REPRESENTATIVES,  
7     WASHINGTON, D.C.

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11    INTERVIEW OF: JACQUELINE SHAY KOTKIEWICZ  
12  
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15                              Thursday, June 2, 2022

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17                              Washington, D.C.  
18  
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20    The interview in the above matter was held via Webex, commencing at 1:13 p.m.

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2       Appearances:

3

4

5       For the SELECT COMMITTEE TO INVESTIGATE

6       THE JANUARY 6TH ATTACK ON THE U.S. CAPITOL:

7

8       ██████████, INVESTIGATIVE COUNSEL

9       ██████, SENIOR ADMINISTRATIVE ASSISTANT

10      ██████████ PROFESSIONAL STAFF MEMBER

11      ██████████ FINANCIAL INVESTIGATOR

12      ██████, CHIEF CLERK

13      ██████████ SENIOR INVESTIGATIVE COUNSEL

14

15

16      For JACQUELINE SHAY KOTKIEWICZ:

17

18      STEFAN PASSANTINO

1

2 [REDACTED] This is the transcribed interview of Jacqueline Kotkiewicz  
3 conducted by the House Select Committee to Investigate the January 6th Attack on the  
4 U.S. Capitol pursuant to House Resolution 503.

5 At this time, I'd ask the witness to please state your full name, and spell your last  
6 name for the record

7 Ms. Kotkiewicz. Jacqueline Kotkiewicz, K-o-t-k-i-e-w-i-c-z.

8 [REDACTED] Now, this will be a staff-led interview, although members  
9 may choose to ask questions. I will note that there are no members currently present.

10 My name is [REDACTED], and I'm investigative counsel with the  
11 select committee. And with me from the select committee is [REDACTED] an  
12 investigator. And also joined with us electronically is  
13 [REDACTED] another investigator on the team.

14 At this time, I'd ask counsel to identify himself for the record.

15 Mr. Passantino. Sure. Stefan Passantino, P, as in Paul, a-s-s, as in Sam,  
16 a-n-t-i-n-o.

17 [REDACTED] Now, Ms. Kotkiewicz, you are voluntarily here for this  
18 transcribed interview. The ground rules for this interview are there's an official reporter  
19 transcribing the record of this interview. The reported transcription is the official record  
20 of the proceeding. This proceeding is also audio and video recorded. We ask that you  
21 not audio or video record the proceeding.

22 Please wait until each question is completed before you begin to respond, and I'll  
23 do my best to wait until your response is complete before I ask the next question. The  
24 reporter cannot note nonverbal responses, such as shaking or nodding your head, so it's  
25 important that you respond to each question with an audible, verbal response.

1 Please give complete answers to the best of your recollection. If a question is  
2 unclear, please ask for clarification. If you do not know the answer, please just say so.  
3 Also, to remind you that it's unlawful to deliberately provide false information to  
4 Congress, and doing so could result in criminal penalties under the law.

5 Logistically, if at any time you need a break or to speak privately with your lawyer,  
6 please let us know. We're happy to accommodate.

7 And do you have any questions before we begin?

8 Ms. Kotkiewicz. No, I do not.

9 EXAMINATION

10 BY [REDACTED] 3

11 Q Can you provide us with your full name?

12 A Jacqueline Shay Kotkiewicz.

For more information about the study, please contact Dr. [REDACTED] at [REDACTED] or [REDACTED].

10. *What is the name of the person who is most important to you?*

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...  
[REDACTED]

**[REDACTED]**

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Is that the number you had in November and December of 1960?

22 A PCS

Q Do you have an Instagram account or a Twitter account?

24 A Yes, I have both.

25 Q And what are your handles for each one?

1           A     I believe my Twitter is @jackikotkiewicz. That's spelled,  
2     J-a-c-k-i-k-o-t-k-i-e-w-i-c-z. And I believe my Instagram account is the same.

3           Q     And did you have those in December of 2020 and November 2020?

4           A     Yes. Yes.

5           Q     Now, I want to go to your educational background. Can you tell us a bit  
6     about that?

7           A     Sure. I graduated from Central Dauphin High School in Harrisburg,  
8     Pennsylvania. And then I attended Gettysburg College in Gettysburg, Pennsylvania.  
9     Graduated with a double major in political science and public policy, and minored in  
10    business. And that's it.

11          Q     And what year did you graduate?

12          A     2019.

13          Q     Okay. So I want to turn to your job for President J. Trump's  
14    for Inc. -- Donald J. Trump for President, Inc., the Trump Campaign.

15          Is your LinkedIn public account, is that, as far as you know, accurate as to your  
16    professional background?

17          A     Yes.

18          Q     Okay. Is it accurate that you started working for the Trump Campaign in  
19    September of 2019 as a research analyst?

20          A     Yes.

21          Q     Can you tell us a bit about your role for the Trump Campaign as a research  
22    analyst? I want to start first with the preelection period.

23          A     Uh-huh. I mean, that's pretty broad, I would say. It was a combination of  
24    things. Originally, when there were multiple candidates, I was in charge of the Elizabeth  
25    Warren book, building out opposition research on Elizabeth Warren. However, once Joe

1 Biden became the nominee, all of us together turned towards Joe Biden. So I was  
2 specifically in charge of the energy and the environment chapters, as well as the  
3 education chapter and the social issues chapters of the Joe Biden opposition book that  
4 we built out.

5 And then the other half the time, we would be monitoring when Joe Biden had  
6 live events, whether that was townhalls or if he was doing a debate, and we would be  
7 fact-checking him in real time or we would be flagging clips for the war room to clip.  
8 We'd also monitor Sunday shows, if there were any good clips from other Democrat  
9 candidates that we could push around on Twitter. And I think that was the general basis  
10 basically of what my job was.

11 Q Let's talk about the reporting structure. Who did you report to as a  
12 research analyst? And let's --

13 A Sure.

14 Q Let's do for the period of 2020. So if it changed over 2020, let me know.  
15 But from January 2020 forward, who did you report to?

16 A It slightly changed. I don't know when exactly. So it was always -- Zach  
17 Parkinson is the research director. At one point, Dean Cleary, he was a research analyst  
18 with me. He became promoted to our deputy research director. So then I reported to  
19 both Dean Cleary and Zach Parkinson.

20 Q Okay. And who were the other research analysts with you in 2020? And  
21 let's start with the preelection period, and to the extent that changed post-election, then  
22 tell us that.

23 A Yup. So we had Matt VanHyfte. There was myself, a girl named Kiersten  
24 Pels, Luis Cornelio, I believe, Brent Perrin, Dean Cleary, and then David Brown. I believe  
25 that's all of us. And then after the election, it was just myself, Matt VanHyfte, and Dean

1 that were asked to stay on longer.

2 Q And when -- was that from election day forward, or at what point did that  
3 determination get made?

4 A I think it was November 15th, if I remember correctly, but I'm not positive.

5 Q So from election day, November 3rd, to November 15th, was the research  
6 team still as -- the same general folks you mentioned earlier?

7 A Yes.

8 Q Who did you understand Zach Parkinson to report to?

9 A I believe he reported to Tim Murtaugh.

10 Q And that's the communications director, correct?

11 A Yes.

12 Q So is it fair to say the research team sat within the comms department?

13 A Yes, kind of. Originally, we sat in the war room, which was right outside of  
14 Tim Murtaugh's office. Later, we kind of got pushed down to a different part of the  
15 office, so we were closer to the strategic communications area but all within comms.

16 Q And when you say the office, what are you referencing?

17 A I don't remember the address, but it's in Arlington, on the 14th floor. I  
18 don't remember the address, so --

19 Q Okay. Now, preelection, did there come a time where you were  
20 asked -- you were asked to research anything related to fraud or voting irregularities  
21 preelection?

22 A I don't believe so.

23 Q Are you aware of anyone else being asked to do any research related to  
24 fraud claims or anything of the like?

25 A Before the election?

1           Q    Before the election.

2           A    No, I don't believe so. No. I don't believe so.

3           Q    Before the election, did you do any research regarding fundraising emails or  
4         fundraising texts?

5           A    In what capacity?

6           Q    As to the accuracy of statements made there within or anything of the like.

7           So a fundraising -- we understand -- just to give you background, and let me know  
8         whether you're aware of this. We understand that Zach Parkinson reviewed fundraising  
9         emails and texts during some of his -- as part of some of his responsibilities as research  
10      director and deputy comms director.

11         First, were you aware of that, that he had that role?

12         A    Yes.

13         Q    And did any work related to that effort come down to you or any research  
14      analysts as far as you know?

15         A    Yes.

16         Q    Tell me about that preelection.

17         A    Yeah. It was -- I would say it was an almost daily email we would get from  
18      our digital team. Sometimes it was more than once a day, and it would be just a bunch  
19      of generic texts about going out to vote, making sure, you know, for the pre-voting period  
20      where you can go and vote early, getting people to request absentee ballots if they're  
21      eligible, just giving, like, voting information, general, like, texts and emails having to do  
22      with that. It's kind of all over the place. Like, I still do that now in my current role at  
23      the RNC, just generic fundraising and texts.

24         Q    Now, when you say you get this email, who is the we?

25         A    Zach would pass it to the research team. He would just send it, and then

1       one of us would go through -- we'd comb through it for edits, to make sure things were  
2       accurate and also like a grammar check.

3           Q     Now, when you say things were accurate, can you explain to me what kind of  
4       things you were looking for?

5           A     Yeah. I mostly just kept an eye out for statistics. So I guess this like -- for  
6       instance, gas prices, making sure they're using the correct gas price number, like statistics  
7       like that.

8           Q     So is it fair to say that you were looking for things that could be proven  
9       either true or false?

10          A     Yes.

11          Q     Okay. Would you ever look -- I'm going to use the term, like, a political  
12       statement. So someone says, Joe Biden would be the worst President ever. Is it fair to  
13       say that that's not the kind of statement you would research as to truth and accuracy?  
14       Is that fair?

15          A     That's fair.

16          Q     Okay. Now, as far as preelection, the review of fundraising emails and  
17       texts, was it just you reviewing that for the analysts or was this sent to all the analysts?

18          A     It was sent to -- I believe, I don't exactly remember, but I believe it was sent  
19       to all the analysts, and we would just take turns every day, because they were quite  
20       lengthy, so one of us a day would kind of go through it.

21          Q     And then when someone had gone through it -- so let's say you went  
22       through it, would you -- was the email going to Zach Parkinson first who would then  
23       forward it or were you directly receiving the emails from the digital folks?

24          A     No. It would go to Zach Parkinson because, ultimately, he was responsible  
25       for them. So he would do a second review, and then he would on his own send edits

1 back.

2 Q Okay. So it would go to Zach. He would forward it to the analysts, and  
3 then the analysts would internally know who's turn it was to do the review?

4 A Uh-huh. Yes.

5 Q Now, post-election, did that continue?

6 A I do not recall. I do not believe so, but I do not remember.

7 Q Do you have any recollection of seeing any post-election fundraising emails  
8 or texts?

9 A I don't have any recollection.

10 Q Do you recall having any discussions with any other analysts or Zach  
11 Parkinson or anyone else in the comms department regarding fundraising emails or texts?

12 A I do not.

13 Q Were you ever asked to do any research in regards to fundraising emails that  
14 had to do with discussions of a stolen election or election fraud?

15 A I do not believe so.

16 Q Did any of your work ever involve researching, preelection, the President's  
17 own statements?

18 A Yes.

19 Q Did that involve researching the President's statements regarding the  
20 potential for election fraud or any election fraud related claims?

21 A I don't recall, but I don't believe so.

22 Q What kind of statements of the President would you -- and to be clear, I  
23 mean President Trump when I'm asking these as the President at that time.

24 Q What kind of statements of his would the research team research?

25 A It would mostly just be fact checks. For instance, if he said

1 something -- this is silly. This is a silly example, but for the wind power, like, President  
2 Trump said it killed a lot of birds, and then we would have to do research too, because  
3 PolitiFact or The Washington Post would contact us. So we had to provide evidence or  
4 some type of basis to back up President Trump's statements. Things like that.

5 Q All right. I want to move forward in 2020, closer to election day. So the  
6 week -- let's talk about the week or the days leading into election day, around that time.

7 The research team, did you all have any preparation for either work that had to do  
8 with election day or the expected work post-election day? So I'm talking about, prior to  
9 election day, were you all preparing for anything?

10 A We were preparing for election day itself. We were not really preparing for  
11 after election day, I would say. I know broader we were. We had like a legal team, but  
12 not on the research side of things, not myself, no.

13 Q And what were the preparations the research team was doing for election  
14 day?

15 A Just myself, I -- not everyone. They were just looking for extra bodies as a  
16 backup war room in case something happened with the WiFi, with the actual war room,  
17 where we would just get calls and pass along information and fun tidbits about election  
18 day. So I just went to a meeting about that. Other than that, that was our only  
19 preparation for election day.

20 Q And when you say the war room, what did the war room do?

21 A On election day, I actually don't know because I didn't get to be part of it,  
22 because they didn't need a backup war room.

23 Q What was your understanding, if you were needed, what you would've been  
24 doing?

25 A I would've been in contact with someone on the ground in one of the States.

1 They would have had to report to me, I think it was every 10, 15, 30 minutes, not sure on  
2 the exact timing, but with what they knew about the vote counts or turnout or things like  
3 that. I'm not exactly sure because I never had to do it.

4 Q Okay. So let's move forward to election day, November 3rd, 2020. Tell  
5 me about where you were.

6 A I was in the Trump Campaign headquarters on the 14th floor.

7 Q And so the results are coming in that evening. What are you doing? Are  
8 you working? Are you just observing the results?

9 A Just observing the results.

10 Q Are you with anyone else?

11 A Yeah. I'm with everyone in the office.

12 Q Is it like a big group watch?

13 A Yes, but we're at our desks. We weren't like partying or drinking anything.  
14 We were sitting on our computers. But I sat in the bullpen, so I was with everyone.

15 Q Okay. So let's go -- the results are going in. Let's go later in the evening,  
16 closer to midnight. So, you know, States have come in and whatnot. Take us to your  
17 thinking about the state of the election around that time.

18 So prior to President Trump making his statements that he made, tell us about  
19 your personal take on what the results of the election were.

20 A I honestly didn't know at that time. No one knew really what the final  
21 results were.

22 Q Do you remember President Trump speaking early that day, I think at like  
23 2 a.m.?

24 A I was awake, but I don't really remember. I was so tired.

25 Q Did you do any work related to the research team on election day?

1           A    I don't believe so. I don't think we had a lot of work to do on election day.

2           Q    So is it fair to say that you didn't work election day, like, as far as you can  
3       recall?

4           A    I'm sure we had some type of project to do. I don't think we were sitting all  
5       day with absolutely nothing to do. But it might have just been making like a Twitter list  
6       or something silly, but I don't know.

7           Q    Okay. So the President speaks. The next day comes, that's  
8       November 4th. Let's kind of walk through that week.

9                  Tell me about what kind of -- progress us through as much as you can recall what  
10      happens that week.

11           A    I actually have a very difficult time remembering because we didn't go to  
12      bed till 3 or 4 a.m., like, election night. We were back in office early the next day. I  
13      think we were trying to do some opposition research on the FOX News person who called  
14      Arizona to, like, show he had Democrat -- like, leaning Democrat bias. And then I  
15      believe it was next day we -- might have been a few days after. I don't remember  
16      timeline specifically -- the Trump war room hotline started, so I was helping take calls and  
17      working with the online system. And then when I wasn't doing that, I was working on a  
18      dead voter project.

19           Q    So we'll talk about the dead voter project in a minute, but let's start with the  
20      online -- the voter hotline. Who asked you to join with that?

21           A    I don't remember.

22           Q    And tell us about the project. What came out of it, if anything? What  
23      was your experience with it?

24           A    It was terrible. The calls -- the people were so mean. It was very sexually  
25      explicit calls. People would play jokes. People would scream in the phone. That's

1 kind of all I remember. I've also blacked that out because people are so mean.

2 Q Do you recall any substantive leads coming through the voter hotline that  
3 you were a part of?

4 A I can't speak to how substantial or how credible they were. I'm not sure.

5 Sometimes some old ladies would call that sounded pretty real, but I wouldn't know.

6 Q Yeah. Did you ever get any feedback of any successes that came out of the  
7 voter hotline?

8 A No.

9 Q Like finding fraud or anything of the sort?

10 A No.

11 Mr. Passantino. Just make sure he gets the chance to get his question all the  
12 way out, just for the benefit of the court reporter.

13 Ms. Kotkiewicz. Uh-huh.

14 BY [REDACTED]:

15 Q So just to be clear, you said that you were not aware of any findings of fraud  
16 that came out of the voter hotline. Is that accurate?

17 A That's accurate.

18 Q And who else staffed the phones for the voter hotline?

19 A I don't know everyone who did it. It was a lot of our building, but I don't  
20 know who.

21 Q Now, on November 4th, I'm looking at what appear to be perhaps G chats  
22 you were having with a colleague. You produced these. Do you know what I'm talking  
23 about?

24 A Yes.

25 Q So on November 4th at 10:11, you have a line when you say to Kyle -- and

1 who is Kyle?

2 A He was an analyst in the war room.

3 Q And what was his role as an analyst in the war room?

4 A He would be watching different television shows and clipping things and  
5 drafting tweets. I believe that's it. I don't know. I can't specifically speak to what he  
6 did.

7 Q Is it fair to say you were friends?

8 A Yes.

9 Q So on what is marked in your production -- we have your whole production  
10 basically marked as exhibit 1, but it is JK121 is the Bates number. And you write to Kyle,  
11 If we count all -- you can see there in the middle there. It says, If we count all, quote,  
12 "legally cast," end quote, ballots, we believe we will win.

13 It seems to cite Bill. Is that Bill Stepien?

14 A Yes.

15 Q And as to this statement, where are you getting that from?

16 A I think he spoke to us, just kind of a rallying up the troops, to keep working  
17 hard type conversation. And Kyle wasn't there for that, so I took notes for him.

18 Q So you're basically recounting to Kyle what happened at this rally, basically,  
19 this get the troops going speech?

20 A Yes.

21 Q And then you respond what seems to be your analysis, you say in parens, To  
22 me this sounds like it's going to be a huge legal battle.

23 Tell me about why you wrote that.

24 A Just because, at the time, we didn't know a lot of information, but there was  
25 a lot of weird things happening with what was getting reported. So it seemed up to like

1 the courts to decide, not up to anything else.

2 Q When you say a lot of weird things happened, do you mean news reports  
3 regarding fraud?

4 A Yeah. We didn't know what was true, what wasn't true at the time.

5 Q And how were you getting your updates about these kind of claims?

6 A Just from the news.

7 Q Were you getting updates from within the campaign or just from you  
8 watching the news and Twitter, et cetera?

9 A Just from watching the news and Twitter.

10 Q Now, what was your expectation as far as stay in this job and when you  
11 would be leaving or done with the Trump campaign?

12 A I didn't really know, but I wanted to stay on as long as possible because I  
13 wanted to get paid because I needed to be able to afford housing.

14 Q Yeah. Were you at that time, around election day, looking for a new job?

15 A Yes.

16 Q Okay. Because there's a part in one of your chats, which we don't have  
17 to -- it's on JK129, but we don't need to pull it up, where you say -- I think you say  
18 something to the effect of, this honestly takes my mind off trying to find a job.

19 So is it fair to say around election day, you were looking to work elsewhere?

20 A Yeah. Just preparing for all circumstances.

21 Q Okay. Did you have expectation that if President Trump had won, you  
22 would've stayed with the campaign and gotten a job elsewhere with the White House or  
23 anything, or no?

24 A That was my hope, but I couldn't be sure.

25 Q Now, you mentioned that you had the voter fraud line and also researching,

1 you mentioned, dead people. So tell us a bit about how you were asked to research into  
2 whether dead people voted and who asked you to do that.

3 A Yup. Zach Parkinson asked us, the research team, to look into if these dead  
4 voters voted. So I don't know where the list of names came from, but we received a list,  
5 and then our job was to go try to find the obituaries for these people. And we were able  
6 to confirm some dead voters. That happens in every election.

7 Q Okay. So we're going to talk in detail, but when you say that happens in  
8 every election, are you -- is that your way of indicating that you didn't find any evidence  
9 of wide-scale voter fraud?

10 A Yeah. That wasn't my ask. I just was asked to look into dead voters, so  
11 that's what I produced.

12 Q Okay. So walk us through your process. You get a list of names, and then  
13 you do what?

14 A We would just go on newspapers.com, look for obituaries. Also, on Google,  
15 we'd search their names, make sure, like, things matched. So more than a name  
16 because there's a lot of people with the same first, last names. So making sure it is  
17 identifiable to that person. I believe we also used -- maybe we used Nexis, not positive,  
18 but to get, like, locations of where they lived.

19 Q Okay. So you went to newspaper -- so you got a list from Zach Parkinson  
20 that people that he -- is it fair to say that these were individuals that he had reason to  
21 believe could have been dead people who, in fact, voted in the election, and he wanted  
22 the research analysts to go and conduct further analysis to confirm that that was, in fact,  
23 the truth? Is that fair?

24 A Confirm or deny whether they were alive, yes.

25 Q Now, who was asked to do that in conjunction with you?

1           A    I don't really remember because it was just two or three of us at a time that  
2 would get taken off the Trump hotline to go and do this project. So I don't know who all  
3 was asked to.

4           Q    So was this prior to the November 15th kind of demarcation you mentioned  
5 earlier where a lot of people were let go?

6           A    I believe it was before then. Not positive.

7           Q    Is there anyone else on your team who you know -- that you recall was  
8 involved in this dead people review? Like Matt, for example.

9           A    I know Dean and Matt definitely did. But I'm not sure about the others.

10          Q    All right. So you would go to newspapers.com. You would perhaps  
11 maybe use Lexis. Any other sources you used in your efforts to confirm or deny this  
12 information?

13          A    Google.

14          Q    Anything else?

15          A    Not that I can recall, no.

16          Q    And what kind of information did Zach Parkinson give you? He gave you a  
17 name, and what else?

18          A    I don't remember what's in the spreadsheet, but I think you guys have that  
19 information.

20          Q    Yeah, I think you're right. I'll pull that up in a minute.

21          Now, we've seen in the -- I'm going to kind of switch gears a bit. We'll come back  
22 to this.

23          In the documents you produced, tell us a bit about where these docs come from,  
24 how you had access to these documents that we got from you.

25          A    Uh-huh. Yup. I was just handed a flash drive with all of the research

1 documents that we put together.

2 Q And who handed you that flash drive?

3 A Zach Parkinson.

4 Q And when did he do that?

5 A Oh, I don't remember.

6 Q Are you asking -- are you saying the information that your lawyer produced  
7 to the committee is that flash drive?

8 A Yes. It's some of the information. It's the information that's specific to  
9 your request.

10 Q Okay. So was this flash drive given to you sometime in November 2020?

11 A No.

12 Q Okay. When was it given to you?

13 A I believe when I started working at the RNC.

14 Q And when was that?

15 A I started April 1st, 2021, at the RNC, but I don't know exactly what day I was  
16 given the flash drive or how many months into work I was given it.

17 Q Okay. And why did Zach Parkinson give you the flash drive?

18 A Because we have a lot of -- we have the Joe Biden opposition book on that  
19 drive. And currently at the RNC, a lot of my work is similar doing opposition research  
20 against Joe Biden.

21 Q Okay. So is it fair to say that -- because Zach Parkinson is now the research  
22 director for the RNC, correct?

23 A Yes.

24 Q So in his role as your supervisor in your current job, he gave you a flash drive  
25 of work product that was done while both of you were working for the Trump campaign.

1       Is that accurate?

2           A     Yes.

3           Q     And you looked at that flash drive and then you pulled information -- or  
4       between you and your lawyer, the information that was responsive to our document  
5       request, and those are the documents that we have.  Is that fair?

6           A     Yes.

7           Q     Did you, yourself, look through the documents you produced to us before  
8       they were produced?

9           A     I did not open them.  I just looked at the names of them, and I thought if  
10      they were relevant, I just passed them along.

11          Q     Okay.  That's all very helpful.

12          We're going to go through some of those documents.  I want to get a sense of  
13      what you can remember working on yourself versus if you know what other people  
14      worked on, and we can just try to parse that out a bit.

15          But very broadly, I want to walk through your understanding of how this -- call it  
16      dead voting project, what the conclusion of that project was.

17          When you were done -- you did your work -- how many names would you say that  
18      you were responsible for versus others?

19          A     I don't remember.

20          Q     Was it more in the realm of -- you know, 10 names that you think you looked  
21      up?  Five names?

22          A     I don't remember.

23          Q     Okay.  And then when you did your research, you provided that to Zach  
24      Parkinson.  Was that in memo form?

25          A     I don't remember.  I'm sorry.

1           Q     How would you generally provide your findings to Zach Parkinson?

2           A     Sometimes it was in Word documents.   Sometimes it would just be through

3     a body of an email.

4           Q     Okay.   And after you provided -- do you recall generally whether you -- your

5     research -- in your research you concluded that dead people had voted?

6           A     We found a few dead voters, yes.

7           Q     And were you aware of just what you did or were you aware of the

8     compilation of the research team's efforts as to overall, like, here's what the research

9     team found?

10          A     I was just aware of my own efforts.   I wasn't really paying attention to what

11     other people were doing.

12          Q     So were the memos that we'll look at in a minute that were on this flash

13     drive, were those memos compilations of everyone's work or did everyone write their

14     own memo?

15          A     That should be a compilation of everyone's work.

16          Q     So what was the process by which you all combined your work into a

17     document?

18          A     On Microsoft Word, you can make things into like a SharePoint, where

19     multiple people can be editing at once.   It's kind of like a live Google doc, but instead it's

20     through Microsoft.   So we all just all crashed the document.

21          Q     Do you recall, after sending this work product up to Zach, do you recall any

22     feedback coming as to your work, whether either that you were accurate in your findings

23     or inaccurate in your findings?

24          A     I don't remember any feedback whatsoever.

25          Q     Okay.   So let's just wrap up about how we -- what you did.   So you would

1 go to newspapers.com, Lexis, Google.

2 So if you had a name and if you could find an obituary that said John Doe died,  
3 and you -- tell us how many -- what are the number of data points you needed to say I  
4 now feel confident it's the same person?

5 A I'm not sure how many data points, but, typically, in obituaries they'll say like  
6 a spouse or children that are left behind, and then a city or town where they're from,  
7 things like that that match up.

8 Q Did you ever use Social Security numbers or have access to that kind of data?

9 A I believe we were. I believe that's on the spreadsheet we were given. I  
10 believe so.

11 Q Were you ever told -- were you ever told that any individuals that you had  
12 said were dead voters were not dead voters after further review?

13 A I was not ever given feedback that way, that I recall.

14 Q Okay. When you were deciding -- when you were researching, did Zach  
15 Parkinson give you parameters of what would be sufficient information to say someone  
16 had, in fact, voted who was dead?

17 A He might have, but I don't remember now.

18 Q Okay. I'm going to show you what is marked in your production as JK44.  
19 So here, is this a document that you've seen before?

20 A Yes.

21 Q Okay. So here when it says confirmed dead voters, is it fair to say that this  
22 is the research team providing this information to Zach Parkinson saying that these are  
23 individuals that have been confirmed to be dead voters?

24 A Yes.

25 Q And so if we scroll down just slightly here -- and I'm just going to kind of walk

1 through so we see how this works. It's saying here that you found this individual. This  
2 is the proof that he's dead, right? That's the first thing you try to find is that this person  
3 that's claimed to be dead is, in fact, dead, and you do that by looking at obituaries,  
4 correct?

5 A Yes.

6 Q And then if we scroll to the bottom of this page, it says, Blalock is registered  
7 as an unaffiliated voter according to GOP data center.

8 Were you all given directives as to look into someone's political affiliation for the  
9 purpose of this list?

10 A So I never had a login to GOP data center when I worked on the campaign,  
11 so that wouldn't have been me.

12 Q Meaning, would someone else have done it for you -- for someone, or  
13 that you just know that that is not your research work then?

14 A I just know it wasn't me. It might have been another researcher who had a  
15 login. But I never had a login, so I don't know.

16 Q Okay. So if we scroll to the next page here, it then has his voter info and  
17 has his registration date as 1996. So just to understand how to read these, it looks like  
18 these seem just to be noting the person has passed away, not that they voted.

19 Were you all relying on whether they had voted to come from Zach Parkinson, or  
20 how were you noting that this was the same person?

21 A I didn't do that part, so I don't know.

22 Q So if you could, if you could walk us through more detail. A lot of these  
23 look in this confirmed section as a compilation of proof of death, and I'm trying to get a  
24 sense of how you all are marrying the proof of death -- like, with this example here, is  
25 there something I'm missing, is what I'm honestly trying to ask, of how this notes this

1 person was, in fact, a dead voter?

2 A I can only speak to the obituaries and if it matched up with the name. That  
3 was kind of my only role there.

4 Q Okay. So you're given a name by Zach Parkinson, and is your job basically  
5 to confirm that someone by that name has died?

6 A That -- hopefully that person, not just anyone with that name, but that exact  
7 name that matches with the other information we were provided on the spreadsheet.

8 Q And when you say the other information -- and we can pull up one of these  
9 spreadsheets. I can show this to you in a minute, but I'm going to read to you -- we'll  
10 look at this in a minute. I think this is what you're talking about, about James Blalock.

11 It says -- it has his year of birth and a date of birth and a registration date for his  
12 voter registration. So is that the kind of information you would look at from Zach  
13 Parkinson's spreadsheet, and if you found that in this information here, that that would  
14 be enough to say that it's the same person?

15 A Yes, but I didn't have access to GOP data center, so I couldn't see the voter  
16 information from our side as to the registered -- like, the voter registration. I could only  
17 see it from, like, the one side. So I only did half the project, so I don't -- I also don't  
18 know how it all matches up. I can't speak to that.

19 Q So who did the other half of the project?

20 A I don't know.

21 Q To be clear, what you did was confirmed the person had died. But whether  
22 or not they were the same person who had voted, how would you do that?

23 A So -- sorry, I didn't mean to interrupt you.

24 So we were given that spreadsheet with the information such as the date of birth  
25 and their name, and I believe maybe a Social Security number there, and then you can

1 pull that information up on Nexis and you can get more information about the person  
2 from there, such as their spouses, children, and then places they've lived, things like that.  
3 And then, with that information, if that matched up to the obituary, making sure it was  
4 the same person as that person that was provided on the spreadsheet with that Social  
5 Security number and date of birth. So I was more so matching up the obituaries with  
6 the Excel sheet.

7 Q Okay. And tell me if I'm missing something, but in deciding whether  
8 someone's a dead voter, it seems like you have to find out three things: One is that, did  
9 someone, in fact, vote, right? Because there's got to be a vote for it to be voter fraud;  
10 did someone, in fact, die, is there truly a dead person out there somewhere; and the third  
11 thing is like, is the person in point one who voted, that information at least, is that the  
12 same information and match of the same person who died, and that's how you'd be able  
13 to confirm and deny whether there was a dead voter.

14 So here, it sounds like -- first of all, is that fair to say, like, the whole entire  
15 process, that would be how one would confirm whether there was a dead voter?

16 A Yes.

17 Q And then for your process, you were confirming, it sounds like, whether this  
18 person -- there's, in fact, a dead person, hence the benefit of having an obituary -- that  
19 people write obituaries of people who have, in fact, died. Is that fair?

20 A Yes.

21 Q Now, how did the other process happen? Meaning, how was there the  
22 proving of that death -- one, that someone, in fact, voted, that point one I made, and  
23 point three, that the voting person and the dead person, that those are, in fact, the same  
24 person? How was that happening?

25 A I believe that we matched up the person's name next -- Social Security

1       number and their date of birth and their voter registration date got matched up with the  
2       obituary where we could find out personal identification information about them. And  
3       that's as far as I know those two things got matched up. I can't speak to it any further  
4       because I'm not aware of anything else there.

5           Q     Okay. So you would look up the voter -- if the voter registration  
6       information matched what?

7           Like, that's what I'm trying to understand, is that, what is the data you're looking  
8       at for the present day to match old data? I'm trying to get a sense of how you're  
9       proving this person voted in a way that matters for this election as opposed to proving  
10      this person is just dead.

11           Mr. Passantino. But I think what she's saying is she didn't do that part of it. So  
12       you're asking her -- at least if I understand the question, you can tell me if I'm wrong. I  
13       think she's saying she doesn't know on that side, unless I misunderstood your question.

14           ██████████. That's helpful. So I understood her to say she only  
15       did -- she didn't have access to the GOP -- is it called the GOP center or something like  
16       that, I believe.

17           BY ██████████

18           Q     So is it right that you were only doing the proof of death, or were you doing  
19       more than that? That's what I'm trying to clarify.

20           A     Proof of death.

21           Q     Okay. So you prove someone -- Alex -- excuse me.

22           Zach Parkinson sends you a list of dead people they think voted. You go, you  
23       find the obituary, you confirm this person looks dead, date of birth matches, whatever,  
24       we got a dead person.

25           What's next? Whether -- who do you pass the information to?

1           A     So we put it in a SharePoint, and then our deputy, Dean Cleary, I believe, he  
2 just passed it back to Zach Parkinson, but I'm not sure. Can't speak to that for sure.

3           Q     But here's what I'm not understanding. It appears that confirming  
4 someone as dead doesn't seem to move the ball too far forward as to confirming whether  
5 a dead person voted. So it seems like there's a piece missing. I'm trying to understand  
6 what involvement you had or who else would have been involved in finding that missing  
7 piece.

8           Because if you have an obituary match a name on a spreadsheet, as I understand  
9 it, it's a little bit of so what, lots of people are dead. But the point is to say, did that  
10 person in fact -- is that the same person who voted? So here, for example -- and we can  
11 scroll through it in a minute -- lots of these information have voter info included, which to  
12 me seems critical to marry the dead voter with the voter.

13           So what I'm trying to understand is that, if you didn't do that, then who did do  
14 that? Or if you did that, how did you do it?

15           A     I did not do that, and I don't know who did that.

16           Q     So when you would -- for example, when you found matches, is it fair to say  
17 that you then were not confirming that someone was a dead voter; you were confirming  
18 merely that they died?

19           A     I -- when I was given the spreadsheet, I just assumed they were a voter, that  
20 person had voted. But I don't know for sure where that spreadsheet came from, so I  
21 don't know.

22           Q     Okay. So -- okay. That's helpful.

23           In your analysis, you presumed that the people who were on that list had, in fact,  
24 voted, and if you could match that spreadsheet's identifiers with an obituary, that  
25 was -- from that, you would say that you confirmed that there was a dead voter?

1           A    Yes.

2           Q    Okay. And the way you would do that, as you noted, was Google, Lexis, or  
3   newspapers.com?

4           A    Yes.

5           Q    Okay. So if we pull back up -- if we pull back up JK45.

6           While that's coming up, do you recall in this exercise that there were dead people  
7   that you did not confirm, that you personally -- like, I see a list up here about  
8   unconfirmed. There's a confirmed list, which we're looking at, and there were  
9   unconfirmed.

10          Do you remember times where you did this work and you didn't confirm what was  
11   asked of you?

12          A    Yes.

13          Q    Okay. And would it just be that the identifiers didn't match? Is that fair?

14          A    Yeah. We weren't able to even find an obituary that existed.

15          Q    Okay. So here -- and do you remember the name, the first name we talked  
16   about, James Blalock? Is that a name that rings a bell to you?

17          A    No.

18          Q    This name here, Deborah Christiansen, is that a name that rings a bell to  
19   you?

20          A    No.

21          Q    Okay. And then another -- we can go to the next page here. It notes  
22   Deborah Christiansen, Jean Christiansen. And then it has voter info. And if we look at  
23   what's on JK48, we see the name Linda Kessler. Is that a name that -- on this confirm list  
24   that you recall by any chance?

25          A    No.

1           Q     Okay. Now, in this same document you provided, these were Georgia  
2       voters that you provided. And then later on, there are names provided for Pennsylvania  
3       voters. Do you recall that?

4           A     I don't. I can't speak to that. I'm sure we were given a list of Pennsylvania  
5       voters, but not positive. I don't know.

6           Q     Uh-huh. Do you know -- we can take the exhibit down.

7           Do you have any knowledge that the intention of having -- of discovering these  
8       dead people voting potentially was in order to make that public and to support that there  
9       might have been voter fraud in the election?

10          A     I'm not aware of what the intentions were with that document. I was just  
11       asked to put things together.

12          Q     Did you have an understanding what it would be used for?

13          A     No.

14          Q     Did you have any discussions with anyone about what it would be used for?

15          A     No.

16          Q     Are you aware that some of the names that you, in fact, put out that you  
17       gave to Mr. Parkinson, you and your team, the research team -- I don't want to, you  
18       know, put it on you -- but the research team, that those names were, in fact, published to  
19       the media? Do you have any knowledge of that?

20          A     I knew that after the fact, after it was published, but I didn't know that was  
21       the intention.

22          Q     Tell me about when you found out they had been published to the media.

23          A     Yeah. I don't know. What do you want me to say?

24          Q     How did you find that out?

25          A     Through Twitter.

1           Q     I mean -- yeah, just if you could explain. Like, did someone tell you on your  
2 team that they were published or did you see it for yourself?

3           A     I can't say for sure, but I'm pretty positive I just saw it on Twitter.

4           Q     Okay. And this is in the post-election period, in like November 2020?

5           A     Uh-huh. Yes.

6           Q     Okay. So you came across that these names -- and is it fair to say, even  
7 though you don't recognize the names now, that you recognized the names that were  
8 published as the work that you had contributed to at that time?

9           A     I can't even say I read that entire article like when it came out. It was just  
10 something that happened, but I don't think I even read the whole article.

11          Q     How did you know it was your work?

12          A     I don't even know if it was my work. I'm sure it was someone's work on my  
13 team because we were working on that project in general.

14          Q     Now, the names are -- end up publishing -- I can -- I mean, the names end up  
15 going out are overall one, two, three, four, five, six, seven, eight names, I think, in the first  
16 bunch with Georgia and Pennsylvania. So it's not a lot of names.

17          So when you received this article, are you saying you don't recall whether you  
18 knew these had anything to do with the work you'd done?

19          A     Yeah. I honestly didn't. I didn't even do that much of this project. I did  
20 some of it. But, again, there was so many names, so many projects, that it was just  
21 another mundane task. It wasn't anything that stood out to me.

22          Q     When you say so many names, you mean so many names with regard to the  
23 dead people voting or so many names regard to something else?

24          A     The dead voters that we know confirmed, whether they did -- they were or  
25 were not alive, we were given a list of names.

1           Q     And how many names do you recall, about?

2           A     I don't know.  Were there like 20 on that spreadsheet maybe?  That's just  
3     a wild guess.

4           Q     Okay.  So when the names went back -- went out to this Twitter thing you  
5     might have seen, did you end up having discussions with individuals on the campaign that  
6     there was media pushback that some of these dead people were, in fact, not dead  
7     voters?

8           A     I don't believe I had any conversations about it.

9           Q     Were you ever asked to confirm any of the work that was put out by the  
10   research team regarding to dead voters, after it had been published?

11          A     I don't believe so.

12          Q     Are you aware that the Linda Kessler that was noted here in -- as a  
13   confirmed dead voter was, in fact, the wrong person, that there was a Linda with a "Y"  
14   versus a Linda with an "I"?  Are you aware of that?

15          A     No, I'm not aware of that.

16          Q     We looked at James Blalock here, who had passed away.  Are you aware  
17   that that voter was, in fact -- that Mr. Blalock had not voted, and it was, in fact, his wife,  
18   who went under the name Mrs. James Blalock, was the voter?

19          A     I was not aware of that, no.

20          Q     Did you have discussions with anyone on your team -- well, let me ask you  
21   this way:  Were you aware about statements that President Trump had made that  
22   thousands of votes were cast for Joe Biden in the name of dead people?

23          A     I believe that statement was made, but I don't recall exactly.

24          Q     When you say you don't recall exactly, does that -- you recall it was  
25   made -- you recall it generally but not -- or tell me -- unpack a bit about what you recall

1 there.

2 A President Trump made lots of statements at that time; I can't remember  
3 every word that he said. Sounds like something he might have said.

4 Q Well, I'm not asking you to remember every word. I'm asking, you did a  
5 research team for his campaign. He made very public statements repeatedly that  
6 thousands of dead people had voted.

7 In November of 2020, were you aware, when you were researching whether dead  
8 people had voted, that the candidate had made statements on that very issue?

9 A I'm sure he had, but I don't remember exactly what he said.

10 Q I'm not asking you whether you're sure he had. I'm asking you  
11 whether -- and if the answer is you don't recall, that's all right.

12 I'm asking whether you recall at that time that he was making public statements  
13 that thousands of dead people voted for Joe Biden?

14 A I remember he was making public statements about dead voters, but I can't  
15 speak to the number or the exact quote.

16 Q Do you recall statements by Rudy Giuliani around this time of your research  
17 also that thousands of dead people had voted for Joe Biden?

18 A Again, I remember hearing him speak about how dead voters had voted, but  
19 I can't speak to the specific number, the exact quote he said.

20 Q Are you aware of any research conducted by the Trump campaign's research  
21 team that offered any support for President Trump's claims that thousands of  
22 people -- thousands of dead people had voted for President Biden?

23 A We found a few people. We didn't find thousands.

24 Q You found a few people who had voted for Vice President Biden?

25 A I don't know who they voted for. We were just looking at dead voters. I

1 can't speak to who they voted for.

2 Q So is it fair to say that -- so I'm going to ask you again. Did you find any  
3 evidence to support President Trump's statement that thousands of people had voted for  
4 Joe Biden in the names of dead people?

5 A We found a few voters who voted that were dead, but not thousands. We  
6 don't specifically know if it was for Joe Biden.

7 Q Now, the multiple mentions I just told you about the media actually  
8 disproving your claims about dead people voting, you weren't aware of those, though,  
9 right?

10 A I was not aware of those, no.

11 Mr. Passantino. And I know you're not trying to be argumentative, but she  
12 wasn't making those claims. When you say that -- these are not her claims. She's  
13 being very clear in what she did and what she didn't do. And maybe you didn't intend  
14 for it to come off, but it wasn't her claims that she was making. And I know you're not  
15 trying to be argumentative. I just want to make sure we're just talking about the facts  
16 she testified to.

17 BY [REDACTED]:

18 Q Well, as I understand it, the facts are that the research team was tasked with  
19 identifying whether people on the Zach Parkinson spreadsheet who were thought to be  
20 deceased were, in fact, deceased people who had voted, and that the research team put  
21 together a list of individuals with a title confirmed -- I believe it was confirmed dead  
22 voters as a result -- as work product for that effort.

23 Ma'am, is that accurate what I just said?

24 A Can you say that again?

25 Q The document I showed you that said -- I believe the title was confirmed

1 dead voters, that was the result of your team's efforts to identify dead people who had  
2 voted, as asked to do by Zach Parkinson. Is that fair?

3 A Yes.

4 Q And then to the extent that those individuals on that list were later proven  
5 to not have been dead voters, that would have been a mistake by the campaign's  
6 research team. Is that fair?

7 A Yes.

1

2 [2:12 p.m.]

3 BY [REDACTED] :

4 Q I want to talk a bit about what other efforts regarding fraud-related research  
5 that you might've engaged in. Can you walk us through a bit what else you did in  
6 November 2020 separate from the dead people voting issue?

7 A I don't remember for sure, but the media has refreshed my memory that I  
8 worked on a Dominion memo. I know that I did that. I know that I did some work for  
9 Victoria Toensing at one point. But I truly don't remember. It was long hours, and I  
10 was pretty tired post-election, so a lot of that I just had kind of pushed out of my brain,  
11 like, I don't remember it anymore.

12 Q When you say pushed out of your brain, was it not an enjoyable experience?

13 A I was tired.

14 Q Let's start with Dominion. Who asked you to do a research related to  
15 Dominion Voting Systems?

16 A Zach Parkinson.

17 Q And what did he ask of you and -- you and with anyone -- and if anyone else  
18 was included, can you tell us who else?

19 A I believe it was Dean Cleary and Matt VanHyfte. I don't think anyone else  
20 was involved in that. We were given a list of claims to either substantiate or debunk,  
21 trying to figure out what was safe to say and what had no basis in reality.

22 Q And generally speaking, what was the result of your -- of your efforts?

23 A Yeah, we put together a memo that we gave back to Zach Parkinson.

24 Q Is it fair to say that you recall debunking a lot of the circulated claims that  
25 were made, or conspiracies, regarding Dominion Voting Systems?

1           A    Yes. I believe we debunked a lot of them.

2           Q    Did Zach Parkinson tell you what he did with that memo?

3           A    No.

4           Q    Do you recall getting any feedback from Zach Parkinson or anyone else  
5         regarding your Dominion memo?

6           A    No.

7           Q    Do you recall any other discussions you had with anyone about public  
8         statements made by individuals associated with the campaign regarding Dominion? So  
9         I'm thinking Rudy Giuliani, Sidney Powell, or anyone else. Did you have discussions  
10      about their continued use -- or continued claims regarding Dominion Voting Systems?

11          A    I don't believe so. We were asked to put together this memo, but that  
12      didn't mean it made it to them or that they saw it or that we could control what they said,  
13      so --

14          Q    And I'm not suggesting that. I ask these questions to understand, you  
15      know -- for the record, it's important to also know what you did know and what you  
16      didn't know and what you did, you know. So I understand some of these questions may  
17      seem like an obvious, like, well, of course, I wouldn't know that, but it's important just to  
18      carve out for an accurate record. So if you could just bear with us on that front.

19          Let's talk a bit about, in addition to Dominion, what other research -- you  
20      mentioned a second research possibility, I think, that you engaged in.

21          A    We did stuff with Smartmatic, but that was in the Dominion memo. At one  
22      point, Victoria Toensing needed some help. She needed like a personal researcher, so  
23      she emailed me with a project. I believe it was just one. It might've been more than  
24      one, but I can't remember.

25          Q    And who did you understand her to be?

1           A     She was maybe a lawyer for the campaign. I don't know.

2           Q     Did you understand her to work with anyone like Rudy Giuliani or anyone  
3     else or be associated with?

4           A     I can make assumptions, but I never really bothered to figure it out.

5           Q     If you were going to make an assumption, can you tell us what the  
6     assumption is and what would it be based on?

7           A     Well, Rudy Giuliani and Sidney Powell were heading up the election integrity  
8     front at that time, so I just assumed, if I was working on election integrity projects with  
9     Victoria, that she was tied into that.

10          Q     So tell us a bit about what you did for her.

11          A     I only remember one thing that I did specifically for her. There might've  
12     been other things, but I don't have access to my, like, email account and so I can't refresh  
13     my memory. I really don't remember.

14          But the one thing I remember was she -- I think it was in Philadelphia,  
15     Pennsylvania -- she asked me to look into -- I guess at the time there was an issue with  
16     poll watchers in Philadelphia, Pennsylvania, and she asked me what nonzero meant. I  
17     guess one of our lawyers said there was a nonzero amount of poll watchers, and I told her  
18     nonzero meant more than one. And then she disagreed with me, so then I just didn't  
19     answer her after that.

20          Q     You said she disagreed with you?

21          A     Uh-huh.

22          Q     What did she say back?

23          A     She thought that the stenographer got it wrong, and that it was none, slash,  
24     zero poll watchers.

25          Q     Any other examples of research that you did for her?

1           A    I think she emailed me some questions at one point that I responded to, but  
2   I don't have my email account, so I don't even know what they would be in regards to. I  
3   can't remember.

4           Q    So is it fair to say that in doing any research that you did for Victoria, that  
5   you did not find any evidence of fraud?

6           A    Yes, that's correct.

7           Q    And is it fair to say that when you did research related to Dominion Voting  
8   Systems, you did not find any evidence of fraud?

9           A    Yes. No instances of fraud.

10          Q    And when you did research and when you took in calls on the voter fraud  
11   line, you did not get any evidence of fraud from that either. Is that correct?

12          A    I wouldn't be able to speak to that.

13          Q    And that's because any evidence, any fraud links, any possible fraud you  
14   passed up the chain, so you wouldn't know what happened to it. Is that fair?

15          A    Yes.

16          Q    So is it fair to say that you didn't get any feedback indicating that the voter  
17   fraud line had been successful in finding any fraud?

18          A    We didn't get any feedback whatsoever.

19          Q    So it would be fair to say you got no feedback about any fraud found through  
20   the voter line then. Is that correct?

21          A    Yes.

22          Q    Any other research efforts that you recall regarding the fraud post-election  
23   that you were engaged in, besides what we've spoken about?

24          A    Nothing else that I can recall.

25          Q    What about research concerning Pennsylvania primary versus the amount of

1       votes in Pennsylvania, regarding the number of ballots? Do you recall anything about  
2       that?

3           A     I do not recall anything about that. Potentially I worked on a project with  
4       that, but I don't remember.

5           Q     And that's all right. I know it's been some time.

6           I'm going to show you a document that's been marked as exhibit 15, and it's a  
7       November 29th email from you to Jason Miller, copying Zach Parkinson.

8           And what happens in -- I'll show you what's page 3 of this document to refresh  
9       your recollection. It's an email from a reporter at the Associated Press, saying to Tim  
10      Murtaugh that they're fact-checking something spreading on social media about a social  
11      media post that claims that Pennsylvania counted more than 2.5 mailed ballots but only  
12      mailed out 1.8 million ballots to Pennsylvania voters. This repeats a statistic stated by  
13      Rudy Giuliani at the November 25th hearing in Harrisburg.

14           And it has a quotation there, I believe that's supposed to be from Rudy Giuliani,  
15       saying that this is part of the -- now, this is the part that is a mystery. Mailed ballots  
16       sent out, 1,823,148, but when you go to the count of the final count of the vote, there  
17       were 2,589,242 mail-in ballots. What happened? How do you account for the 700,000  
18       mail-in ballots that appeared from nowhere?

19           And he said that was a quote from Rudy Giuliani at the November 25th hearing.

20           Do you recall doing research regarding this issue?

21           A     Yes. This definitely has reminded me of this.

22           Q     Okay. And you see at the top of this is an email from Jenna Ellis that says  
23       that that data was from the PA secretary of state's website that was pulled down on the  
24       date of the hearing. Mr. Murtaugh says, can anyone substantiate that?

25           And then Jason Miller says, Jenna, should we send them this?

1           And then at the bottom of page 1, Jason Miller emails you and says, Assuming  
2       Victoria does not have something urgent on your plate, the mayor read from, and I  
3       believe distributed, the below flyer at the PA hearing last week, leading to an inquiry from  
4       the AP. Are we able to prove any of these claims? And he has "any" in all caps. Our  
5       substantiation is pretty thin, and nobody can seem to remember who did the initial  
6       tabulations here.

7           Now, did Jason Miller often send you assignments directly?

8           A     No.

9           Q     So was this then, like, was it noteworthy that Jason Miller was sending you  
10      an assignment directly?

11          A     Yes.

12          Q     So here, it's -- were you, at this point -- this is November 29th. Did you  
13      have an understanding as to whether Rudy Giuliani's team had -- there was difficulty  
14      substantiating the claims they were making publicly? Was that something that you  
15      were aware of?

16          A     I don't know where Rudy Giuliani was getting his information from.

17          Q     But I'm asking, here, Mr. Miller sends you an email directly. He's aware  
18      that you've been working with Victoria, like you just told us. He doesn't give you an  
19      introduction or otherwise say like this is coming out of the blue. So it leads me to  
20      believe that you all had some kind of prior work relationship. Is that fair?

21          A     No, we did not have any prior work relationship.

22          Q     Okay. So as you recall, this would be -- is this the first email you recall  
23      Mr. Miller sending to you directly, one-on-one?

24          A     Most likely, yes.

25          Q     Okay. Had you otherwise provided work or research that you knew he was

1 involved in reviewing that he would know who you are?

2 A I believe post-election, Victoria needed someone, a researcher, and so I was  
3 like the go-to election integrity person. So I assumed Zach just made Jason aware, but  
4 I'm not positive how Jason knew I was that person.

5 Q Okay. Now, when he writes here, are we able to prove any of these claims,  
6 I tend to read that as he is -- and obviously in the next sentence -- that he thought it  
7 questionable that these claims were true.

8 Are you aware of discussions internally, that you were aware of, and the research  
9 team, about difficulty substantiating claims made by Rudy Giuliani or anyone on his  
10 team?

11 A I believe, yes.

12 Q Is that to say that folks on the research team believed that the claims they  
13 were making were often difficult or impossible to substantiate?

14 A Yes.

15 Q And did those people who had those thoughts include Zach Parkinson?

16 A I can't speak to what Zach Parkinson thought. He never really read me in to  
17 his own thinking.

18 Q So tell us who expressed to you that -- tell us where you got your  
19 understanding from that it was difficult or sometimes near impossible to substantiate  
20 Rudy Giuliani's claims?

21 A It would just kind of be joking around with my friends on the campaign,  
22 because some things that would be said were just, I guess, hard to believe that they  
23 would be true.

24 Q And did you have any other discussions with anyone more senior than you at  
25 the campaign?

1 A No.

2 Q Did you have the discussions with your fellow research analysts?

3 A Yes.

4 Q Who specifically?

5 A Matt VanHyfte and Dean Cleary.

6 Q And both Matt and Dean both shared the view that these claims made by  
7 Rudy Giuliani's team were hard to believe or to prove. Is that fair?

8 A I believe so, but I can't say for sure what they believed.

9 Q And tell us what specific claims were so hard to believe.

10 A I don't remember exactly.

11 Q Do you remember any of the claims that you thought were hard to believe?

12 A I believe one of them was from that Dominion memo, something about the  
13 voting machines being tied to either Spain or Venezuela or something.

14 Q Is it fair to say that all of the claims you found hard to believe were related  
15 to voter fraud?

16 A Yes, because I believe that's the only thing that was being spoken about at  
17 the time.

18 Q So would it be fair to say that you didn't find Mr. Giuliani credible, from your  
19 vantage point, as it came to voter fraud claims that you were aware of?

20 A Yes.

21 Q And from the best of your -- from your vantage point as best as you know, is  
22 it fair to say that Matt -- VanHice?

23 [REDACTED] Hyfte.

24 BY [REDACTED]

25 Q -- VanHyfte had the same view as well?

1           A    I believe he did.

2           Q    And is it fair to say that you also believed that Dean Cleary had the same  
3         view as you regarding Mr. Giuliani and the lack of credibility with his voter fraud claims?

4           A    I can't say for sure for Dean Cleary. Not sure.

5           Q    Did you ever become aware of any kind of these discussions -- let me  
6         rephrase that.

7           Did you have any insight into Jason Miller's views as to Mr. Giuliani?

8           A    I do not have any insight there.

9           Q    And did you all have similar discussions regarding Sidney Powell?

10          A    With who?

11          Q    With Matt and Dean.

12          A    I believe we did.

13          Q    And did you all also find -- well, let me start with you. Did you find Sidney  
14         Powell's claims regarding voter fraud to lack credibility?

15          A    Yes.

16          Q    And in your discussions with Matt, did you also understand that he shared  
17         your view that Sidney Powell lacked credibility when it came to voter fraud claims?

18          A    I believe he did.

19          Q    And with Dean Cleary, did you also understand, to the best of your ability,  
20         that he shared your view as it related to Sidney Powell and that her voter fraud claims  
21         lacked credibility?

22          A    I believe he did, but I can't say for sure.

23          Q    Did you have any insight into how Zach Parkinson thought about Sidney  
24         Powell?

25          A    I had no insight.

1           Q     We're going to scroll up on this document here, exhibit 15, which has your  
2 response.

3                 And here, you explain that what appears to have happened was that someone  
4 cited numbers on this flyer from the 2020 PA primary election and not the general  
5 election. And then you go on to explain why that mistake would lead to confusion.

6                 Do you recall sending this response?

7           A     I do now, yes.

8           Q     Do you recall getting any feedback from this response?

9           A     I do not recall.

10          Q     So this email here is November 29th of 2020. We've talked about  
11 Dominion Voting. We've talked about dead people. We've talked about a research  
12 assignment that you did for -- what's Victoria's last name? I'm sorry. I'm blanking.

13          A     I think it's Toensing. I might spell it wrong, but I think it's T-o-e-n-s-i-n-g?  
14 Might've switched a few letters there.

15          Q     We talked about the discreet assignment you did for her and then the voter  
16 fraud line. Anything else that you remember doing research for post-election besides  
17 what I've just named?

18          A     Nothing else that I remember.

19          Q     How about any opposition research related to individuals who made claims  
20 opposing President Trump's fraud claims? So, for example, the Arizona attorney  
21 general, Mark Brnovich. Do you remember doing any research related to him?

22          A     I think we might've done a project with that.

23          Q     And the Arizona secretary of state, Katie Hobbs?

24          A     Yes.

25          Q     What do you remember about those research assignments?

1           A     I truly don't remember much. I think we were just trying to make them  
2 maybe far left Democrats, but, like, I don't know for sure. There were so many projects,  
3 like, only guessing here.

4           Q     I'm going to show you what's been marked as exhibit 16. And I'm happy to  
5 show you the whole thread, but I'm going to try to, just for the purposes of time, try to  
6 get to the point. I'll give you some back story.

7                 Here, what this thread shows is Bill Stepien sending Tim Murtaugh and others an  
8 email, saying, Can your team do a research on the Arizona attorney general?

9                 And then Mr. Parkinson responds with various comments, but he tells Tim  
10 Murtaugh that his team will pull this information together, and they -- it looks like  
11 basically trying to find oppo research on two individuals who were not -- who were  
12 pushing back against the presence of fraud in Arizona.

13                 Does that ring a bell as to what I'm talking about?

14           A     A little bit, yes.

15           Q     I'm going to show you what's on -- when Zach Parkinson brings you in.

16                 On page 2 -- let's go to page 2 of this document.

17                 You'll see at the bottom of page 2, there's talking points that show both where  
18 Arizona Secretary of State Katie Hobbs has seemingly negative factors when it comes to  
19 election fraud and -- for example, at the bottom, Arizona Attorney General Mark  
20 Brnovich, it notes that he refused to publicly back President Trump in the 2016 general  
21 election.

22                 Is it fair to say this is kind of generic oppo research that could be used?

23           A     Yes.

24           Q     And this is the kind of thing that the research team would do sometimes,  
25 right?

1           A     Yes.

2           Q     Now, if we scroll up on this page, we see that Mr. Murtaugh responds to  
3     Mr. Parkinson, and then on top of that, he then forwards it to you and Dean Cleary,  
4     where he says, Get me all statements that Brnovich has made on the election result,  
5     including Trump will win, include what he said saying it's over, anything we need for  
6     general awareness.

7           And then on the first page, Dean responds, On it. And you're still on the thread.

8           Mr. Parkinson then says, Where are we? He says, I can send you what we have  
9     after I finish transcribing a video bullet. Will respond shortly.

10          Dean Cleary attaches a doc. You're still copied. And then the rest we can move  
11     on from.

12          So my question for you here is, do you remember being asked -- were you ever  
13     asked to do any research as to whether, in fact, there was fraud in Arizona?

14          A     I don't think we specifically were looking into fraud in Arizona. I think we  
15     were just looking into Brnovich's statements, according to this email.

16          Q     So is it fair to say that you were asked not to use your time researching  
17     whether, in fact, fraud existed, but instead, to find oppo research against the two State  
18     officials who were saying that there wasn't fraud?

19          A     I don't even know in this case if it was opposition research. It might've just  
20     been general awareness, here's what this person has said.

21          Q     And tell us the difference between those two things.

22          A     Opposition research is more so in trying to hit someone with information.  
23     General awareness is just getting all the information that they said, good and bad.

24          Q     And here, do you recall it being one or the other?

25          A     I do not recall. But it appears from this email, that it was just general

1 awareness that Zach Parkinson was looking for.

2 Q Besides the handful of dead people voting, were you ever asked to  
3 look -- besides the dead people voting and Dominion-related issues, are you aware of,  
4 you or the research team, ever being asked to look into any other claims of fraud?

5 A I don't believe so. That -- yeah, I don't remember.

6 Q So it's fair to say that you aren't aware of any other -- of you or any of your  
7 colleagues' research team being asked to find evidence of widespread voter fraud?

8 A Yes. Nothing that I can remember.

9 Q And you did, in fact, not find any evidence of widespread voter fraud,  
10 correct?

11 A I did not.

12 Q And you were not aware of anyone else on the research team finding  
13 evidence of any widespread voter fraud, correct?

14 A Correct.

15 Q Now, I want to return just quickly, with regard to fundraising emails, you  
16 testified earlier that, post-election, you do not recall reviewing any fundraising emails.  
17 Is that correct?

18 A Nothing that I can recall, but you guys have the emails, but I don't remember  
19 doing any of that.

20 Q Do you recall anyone besides Zach Parkinson doing any research related to  
21 fundraising emails or texts?

22 A I'm not aware of if there were -- anyone else did that.

23 Q Do you recall doing any work related to messages that were sent over the  
24 Trump Campaign's phone app?

25 A I -- was that part of the fundraising emails? I'm not sure. I don't know

1 what went where.

2 Q Well, is there any work, do you remember, specifically that was, as you  
3 understood it, specifically for the Trump app?

4 A I don't know what went where, so I don't know.

5 Q Now, when did your contract end with the Trump Campaign?

6 A Technically, it ended December 15th, but that was an accident because I was  
7 supposed to get paid through the 30th.

8 Q And so tell us -- and we've seen the email regarding the payment issues. So  
9 tell us -- it seems like those were resolved. Is that fair?

10 A Yes, that was resolved.

11 Q So when did you end up working till?

12 A The 30th.

13 Q Okay. So tell us, the 30th comes, and are you done with the campaign  
14 after that? Do you do any work after the 30th?

15 A I don't do any work after the 30th.

16 Q Okay. So you leave on the 30th, you turn in your laptop, turn in your  
17 devices. And then, when January 6th comes, are you working for anyone else or are you  
18 just not working at all?

19 A I think I was in between jobs. I didn't start at the Republican Governors  
20 Association till a few days later, I believe. I don't know what day I started at the RGA,  
21 but I know I was at home on January 6th, so --

22 Q And where was home?

23 A That was in Arlington at the time.

24 Q Okay. So let's go to the day. Did you watch the President's speech on the  
25 White House Ellipse that day?

1           A     No, I did not.

2           Q     Going into January 6th, did you have a view that there was widespread fraud  
3     in the 2020 election?

4           A     No.

5           Q     Is it fair to say that you thought -- that you believed the President's  
6     statements that there was widespread fraud were not true?

7           A     Yes.

8           Q     Going to the day of the attack, January 6th, can you tell us where you were  
9     when you realized that there was an attack on the Capitol?

10          A     I was at home in my apartment in Arlington. I think I was just on my couch  
11         and on Twitter. I think maybe someone texted me, asking me, like, if I was okay,  
12         because they saw the news. And then I was like, what do you mean, I'm in Arlington,  
13         I'm not in D.C. That's all I recall.

14          Q     And then did you watch news coverage of the attack as it unfolded?

15          A     Yes.

16          Q     And what was your -- tell us a bit about your response watching the attack.

17          A     I was just trying to understand what was happening then, while it was  
18         happening. Just kind of nothing really added up, and then -- I don't know, it just made  
19         me sad, but -- yeah.

20          Q     Looking back now, the President has made -- and I just asked you another  
21         variation of this, but I want to ask you just again to be clear.

22          The President has made a wide variety of claims from even prior to election day to  
23         post-election day regarding fraud in the election. And to be clear, I'm talking about the  
24         former President.

25          President Trump has indicated that there was widespread fraud, a variety of ways

1 and means that impacted the election. And it sounds -- and I want to just get this  
2 correct, but it sounds like you, as the research team for the campaign, found zero  
3 evidence of that in line with what you looked at. Is that fair?

4 A Yes, that's fair.

5 Q During any of the time you did any of your research, were you aware of any  
6 efforts by anyone to make the President aware of the results of the research team's work  
7 on any of these issues?

8 A I don't know where information went.

9 Q With regard to your testimony here today, have you discussed -- outside of  
10 your lawyer, have you told other people that you're meeting with the select committee?

11 A Yes.

12 Q And who have you told?

13 A Basically, like, all my friends and everyone in the office.

14 Q And have you discussed your testimony with anyone?

15 Mr. Passantino. Other than me.

16 Ms. Kotkiewicz: Oh. No.

17 BY [REDACTED]:

18 Q Okay. Have you discussed your testimony with anyone you worked with at  
19 the Trump Campaign?

20 A No.

21 Q Have you spoken to Zach Parkinson at all in any capacity regarding you  
22 speaking to the select committee?

23 A I told him I was speaking with the select committee, but we didn't discuss  
24 what he talked about. I know he also spoke with you guys, but we didn't discuss what  
25 he spoke about. And I -- he gave me no direction, nothing like that. It was just more of

1 a, head's up, I'm going to be out of the office for this.

2 Q Going back to January 6th, did you talk to Zach Parkinson that day?

3 A No.

4 Q Have you talked -- have you spoken to Zach Parkinson at any time regarding  
5 the events of January 6th?

6 A No. I don't think so, no.

7 Q Have you spoken to Zach Parkinson at any time regarding his views of  
8 whether there was election fraud in 2020 that impacted the election?

9 A No. Sorry, I didn't mean to interrupt you. No.

10 Q Okay. Did you speak to Dean Cleary about the events of the 6th?

11 A Maybe?

12 Q What do you recall about maybe speaking to him?

13 A I feel like, at the time, like, potentially maybe had a text conversation with  
14 him, like, whoa, did you see what was happening on TV. But that's about it.

15 Q What about Matt?

16 A Same thing as Dean.

17 Q Did you have any conversations with any campaign staffers about your view  
18 as to the President's actions on January 6th?

19 A No.

20 Q What were your views as to the President's actions on January 6th?

21 A I truly wish he would've spoken up to everyone who -- that were headed to  
22 the Capitol. That's it. I wish he would've said something.

23 Q Has anyone offered to pay your attorney's fees?

24 A The RNC is paying for my attorney.

25 Q And earlier when you said you wished the President had said something, you

1 said -- is that you wish he had told the people at the Capitol to go home?

2 A Yes.

3 Q Is it fair to say you were disappointed that he didn't say anything?

4 Mr. Passantino. I'm not -- I mean, I don't mind you answering. It's kind of  
5 argumentative, what a 23-year-old thinks about the President should've done. I'm not  
6 sure the relevance.

7 The only reason I'm raising this is because when testimony like this sort of leaks  
8 out, it becomes really damaging to young people who are just here to be honest and give  
9 you their views. And asking her subjective view about the propriety of the conduct of  
10 the President can only hurt her when you guys put this stuff out.

11 And it's, candidly, the -- it's the Congress' job to reach whatever conclusions and  
12 put that before the American public. And I'm really just trying to protect my client here,  
13 that asking her subjective questions about the President, when this stuff all leaks out, is  
14 just really harmful to someone who's trying to help serve the country and help you all.

15 So I'd ask you to show some discretion in asking stuff that's not going to really  
16 advance the ball too much.

17 Now, with that, I'm not instructing her not to answer.

18 [REDACTED] And I appreciate that, and all discretion will be used here.  
19 But, you know, I think your client is an incredibly relevant witness, because her and her  
20 team were responsible for researching the very claims made by the President. And even  
21 on the day, if I'm not mistaken, and my team can correct me, but even on the day of  
22 January 6th, the President made claims regarding dead people voting, the very claims  
23 that were researched by the team.

24 So I think it's incredibly relevant to understand what the people the campaign  
25 tasked to research the very claims that were then expressed by the President before the

1 Capitol was attacked, and the views of the people who were at the forefront of  
2 researching those claims I think is relevant here.

3 So I take all what you said, and I don't have a lot of questions on this point, but,  
4 you know.

5 BY [REDACTED]:

6 Q So just to get back to the question. And you mentioned you wish he had  
7 said something. What do you wish he had said?

8 A Can I just say something else first?

9 Q Yeah.

10 A Again, like, this is my first job out of college. I was a very low-level staffer.  
11 I was literally one of the least paid, like, people on the Trump Campaign. I was asked to  
12 do an assignment, and I did it, and I don't know where any of it went because I was so low  
13 level. So I just kind of want to put that on the record.

14 Q And I think that is a very important thing, and that actually, I think, helps  
15 make a clearer record, that what was asked of you directly out of college, and for issues  
16 of incredible importance to the Nation, for someone who was quite young. So I think  
17 that is -- that's an important thing to have on the record.

18 So just to -- back to my question. I wanted to circle back to what you said, what  
19 you wished the President had said.

20 A Well, I think I answered that earlier. I wish he just would've told his  
21 supporters to go home. Like, I still love President Trump to this day, but I just wish  
22 everyone would've went home.

23 [REDACTED]. Okay. If we could just take -- let's take a 2-minute break,  
24 I think we'll be nearing the end. So if we could just take a 2-minute break, just give us a  
25 second to circle up, we'll be there. All right?

1           Mr. Passantino. Okay. Sounds good.

2           ██████████. Okay.

3           [Recess.]

4           ██████████ All right. I think that we've -- that's the end here,  
5 hopefully.

6           Ms. Kotkiewicz -- did I say that? How do I say it? Kotkiewicz?

7           Ms. Kotkiewicz. Kotkiewicz.

8           ██████████ Kotkiewicz. Kotkiewicz. I have a very long name, so I'm  
9 very sensitive to folks just -- you know, I'm always like, it's just English letters, just say it  
10 correctly, but --

11           Thank you so much for taking out the time. I know this process is not easy to be  
12 a part of. And hopefully this -- you know, we weren't here too long, so hopefully it  
13 wasn't too painful, but thank you for taking out the time. Thank you to your lawyer as  
14 well.

15           Before we go, you obviously -- you know the topics that we were interested in,  
16 you know what we've asked. Is there anything I haven't asked you that you think we  
17 should know or you want to say now before we end?

18           Ms. Kotkiewicz. No.

19           ██████████ Okay. All right. Unless someone has anything else, we  
20 will be in recess, subject to the call of the chair.

21           [Whereupon, at 2:51 p.m., the interview was recessed, subject to the call of the  
22 chair.]

1 Certificate of Deponent/Interviewee

2

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4

4 I have read the foregoing \_\_\_\_ pages, which contain the correct transcript of the  
5 answers made by me to the questions therein recorded.

6

7

8

9

10 Witness Name

11

12

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14

15

Witness Name

Date