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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 DEPOSITION OF: ANDREW ZACHARY PARKINSON

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15 Wednesday, May 18, 2022

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17 Washington, D.C.

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20 The deposition in the above matter was held via Webex, commencing at 10:09
21 a.m.

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2 Appearances:

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5 For the SELECT COMMITTEE TO INVESTIGATE

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

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8 ████████ SENIOR ADMINISTRATIVE ASSISTANT

9 ████████ SENIOR INVESTIGATIVE COUNSEL

10 ████████ FINANCIAL INVESTIGATOR

11 ████████, INVESTIGATIVE COUNSEL

12 ████████ INVESTIGATIVE COUNSEL

13 ████████ PROFESSIONAL STAFF MEMBER

14 ████████ CHIEF CLERK

15 ████████ SENIOR INVESTIGATIVE COUNSEL

16

17

18 For ANDREW ZACHARY PARKINSON:

19

20 DAVID WARRINGTON, ESQ.

21 MICHAEL COLUMBO ESQ.

22 ERIN POTTER

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2 [REDACTED] This is the deposition of Zachary Parkinson conducted by
3 the House Committee to Investigate the January 6th Attack on the U.S. Capitol, pursuant
4 to House resolution 503.

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

7 The Witness. Andrew Zachary Parkinson. Last name is spelled P-a-r-k-i-n-s-o-n.

8 [REDACTED] This will be a staff-led deposition, although Members may
9 attend and choose to ask questions. I will note that we are not currently joined by any
10 Members. My name is [REDACTED] and I'm an investigative counsel with
11 the select committee.

12 With me from the select committee is [REDACTED], senior investigative counsel;
13 [REDACTED], investigative counsel. We have [REDACTED], a financial
14 investigator, and also joined remotely are various subcommittee staff, but I'll let you now
15 know as of now everyone on -- oh, I see [REDACTED] is another professional staff
16 member of the committee. If anyone joins, Mr. Parkinson, from the Members, I'll let
17 you know.

18 Under House deposition rules, neither committee members nor staff may discuss
19 substance of testimony today unless the committee approves release. You and your
20 attorney will have an opportunity to review the transcript.

21 Note that under House rules, you may have your attorney present, but counsel for
22 other individuals may not be and, therefore, not present. And that's same with any
23 other government agency.

24 At this time, I'd ask your counsel to please state his name for the record.

25 Mr. Warrington. David Warrington and with me is Michael Columbo, my

1 colleague.

2 [REDACTED] I also note there's an Erin Potter. Is she also one of your
3 colleagues?

4 Mr. Warrington. She is not my colleague, she's my legal assistant. And she'll be
5 taking notes for us.

6 [REDACTED] Okay. Some ground rules for this deposition Mr.
7 Parkinson, there's an official reporter transcribing the record of this interview. The
8 reporter's transcription is the official record of the proceeding. This proceeding will also
9 be audio and video recorded. And Mr. Parkinson and Mr. Warrington, we ask that you
10 do not audio or video record this deposition.

11 Mr. Parkinson, please wait until each question is completed before you begin to
12 respond. We'll do our best to wait until your response is complete before we ask the
13 next question.

14 The reporter cannot note nonverbal responses such as shaking or nodding your
15 head, so it is important that you respond to each question with an audible, verbal
16 response. Please give complete answers to the best of your recollection. If a question
17 is unclear, please ask for clarification. If you do not know the answer, please just say so.

18 I will remind you that it is unlawful to deliberately provide false information to
19 Congress. Doing so could result in criminal penalties including under 18 U.S.C. 1001.
20 Because this deposition is under oath, would you please raise your right hand to be
21 sworn.

22 The Reporter. Do you solemnly declare and affirm under the penalty of perjury
23 that the testimony you are about to give will be the truth, the whole truth, and nothing
24 but the truth?

25 The Witness. I do.

1 Now, Mr. Parkinson, logically, if at any time you'd like a
2 break or to discuss something privately with your attorneys, please let me know. We're
3 happy to accommodate. I'll note that multiple people from the committee staff will be
4 asking you questions today.

5 But before we get started, do you have any questions for us?

6 The Witness. I don't think so.

7 EXAMINATION

8 BY [REDACTED]

9 Q All right. We're going to show you what has been the subpoena that was
10 issued by the select committee, which has been marked exhibit 67.

11 Now, we'll note that this -- there you see the subpoena itself, Mr. Parkinson. Can
12 you confirm that you are the A. Zachary Parkinson named in this subpoena?

13 A Yes.

14 Q And do you understand that you're appearing here today pursuant to this
15 subpoena?

16 A Yes.

17 Q And this subpoena also required the production of documents ascribed in
18 the schedule attached to it by May 11th, 2022. Do you understand that?

19 A Yes.

20 Q All right. Thank you, sir. You can take that down.

21 Now, Mr. Parkinson, can you tell us your date of birth?

22 A It's [REDACTED]

23 Q And I don't know whether we got this, what the A. stands for in A. Zachary
24 Parkinson?

25 A It's Andrew.

1 Q Thank you, sir. Can you please tell us your address? Where do you
2 reside?

3 A My current address is [REDACTED], and that's in [REDACTED],
4 [REDACTED]

5 Q And did you live there on or about December 2020?

6 A I did not. I lived in the [REDACTED] neighborhood of Washington, D.C. at that
7 time.

8 Q And what cell phone number did you use between November 2020 to
9 January 2021?

10 A My personal cell phone number is [REDACTED]. I don't remember what
11 my work cell number was.

12 Q And what email addresses did you use during that time period?

13 A I would've used my personal email address, which was
14 [REDACTED]. I also would have had an email address with the Trump
15 campaign, which if I remember correctly would've just been
16 ZParkinson@DonaldTrump.com.

17 Q Any other email addresses?

18 A Not that I would have been using actively, no.

19 Q What about social media? What Instagram or Twitter account did you have
20 during that period?

21 A I have a Twitter account, which is @AZachParkinson, which I would have
22 been using mostly for work at that time and then I have an Instagram account, but I'm not
23 sure -- I'm not even sure what my user name is.

24 Q Tell us a bit about your highest level of education.

25 A I graduated from Johns Hopkins University with a bachelor's degree.

1 Q In what field?

2 A The major was in international studies.

3 Q Let's go generally through your professional background. Is the
4 information on your LinkedIn page, to the best of your knowledge, accurate?

5 A Yes.

6 Q So let's move through this pretty quickly.

7 So in 2016 through February '17 you were research analysis for the RNC. Is that
8 right?

9 A I'm sorry. Repeat that question.

10 Q From January 2016 to February 2017, you were research analyst for the RNC.
11 Is that right?

12 A That's correct.

13 Q And what did you do as a research analyst generally?

14 A Conducted opposition research for the RNC on Democratic candidates,
15 engaged in other research tasks as-needed by the research director there.

16 Q And who was that?

17 A Raj Shah.

18 Q And then next you went to the White House from February 2017 through
19 March 2019. Is that correct?

20 A That's correct.

21 Q And you left as a deputy director of governmental communications. Can
22 you tell us generally what that means?

23 A That job involved coordinating communications' efforts between cabinet
24 agencies, the White House, and also coordinating efforts between Members of Congress,
25 their offices, and the White House as well.

1 Q And then next you were, which is the most relevant for our purposes, the
2 deputy director of communications for the Trump campaign from March 2019 through
3 January 2021. Is that right?

4 A Yes.

5 Q So tell us what were your roles and responsibilities as the deputy director of
6 communications.

7 A I was the deputy director of communications for research, which broadly
8 involved me heading up the campaign's opposition research efforts. That was a matter
9 of looking into possible opponents in the re-election campaign. Also involved doing
10 general research for the campaign, whether that would be into the President's policies,
11 otherwise, you know, handling research requests that the communications department
12 might have or the broader campaign might have.

13 Q So as the deputy comms director, did you have nonresearch related
14 responsibilities?

15 A I mean, it would depend on what you classify as research. I would do -- you
16 know, I would certainly handle other general communications, political communications,
17 tasks, you know. I'd work with reporters. I would assist, you know, drafting
18 statements sometimes, things like that. But, in general, I was mostly focused on
19 handling the research needs of the campaign.

20 Q Let's talk about the reporting structure of your time at the campaign.
21 Who did you report to?

22 A Tim Murtaugh, who was the communications director.

23 Q And was that for your -- the full time you were at the campaign?

24 A Yes.

25 Q And what direct reports did you have? And if that's shifted over time, let's

1 do for 2020 forward your direct reports?

2 A In 2020, I would've had, I believe, seven direct reports at one point or
3 another. Jacki Kotkiewicz, Dean Cleary, Matt Van Hyfte.

4 Q And I'm sorry to interrupt. When you say these names, if you know they're
5 spellings just for the court reporter, if you could just say this is how you spell each last
6 name if it's not --

7 A Jacki Kotkiewicz is J-a-c-k-i, last name is K-o-t-k-i-e-w-i-c-z. Matt Van Hyfte
8 is V-a-n, space, H-y-f-t-e. Dean Cleary, C-l-e-a-r-y. Brent Perrin. Last name is
9 P-e-r-r-i-n. Kiersten Pels, K-i-e-r-s-t-e-n, P-e-l-s. Luis whose last name I'm forgetting at
10 the moment, L-u-i-s. And then David, his last name I'm also forgetting at the moment.
11 I think that's seven.

12 Q And did these seven people have the same title or different titles?

13 A Dean, at some point, I'm not -- I don't remember exactly when, became the
14 deputy research director. Everyone else I think the titles may have varied slightly, but
15 were all at the equivalent level.

16 Q All right. Let's move forward in 2020 to around election day. By the time
17 you get to election day, do you still have seven people reporting to you, the research
18 team or has that team changed in size?

19 A On election day?

20 Q Yeah.

21 A I believe everyone was still there on election day.

22 Q Okay. And we'll talk -- when we get into the post-election period, we'll
23 discuss further whether those or how the team shifts.

24 Q All right. So as the election got closer, was there any preparation or -- how do I
25 word this -- any preparation that the research team had in place for the post-election

1 period? So coming to election day, was there any kind of preparation, tasks that you
2 already had in hand that you expected to conduct in the post-election period?

3 A I don't -- I don't really recall any post-election planning, no.

4 Q What about on the comms side for your work? Was there anything
5 post-election that you had planned as your kind of nonresearch portfolio?

6 A As of election day, not that I recall.

7 Q Okay. All right. Let's go to election day. Tell us a bit about your election
8 day. Where did you watch the results?

9 A I would have been at the campaign headquarters as best I can recall all day.

10 Q Okay. So let's go to the evening of election day, the results are coming in,
11 you're observing those. What's the research team doing the night of the election?

12 A As best I can recall, just watching the results, for the most part. Yeah. I
13 don't remember a lot of particulars in terms of assignments for that night.

14 Q Okay. I'm going to show you what's been marked as exhibit 36, which is a
15 document that you produced.

16 And it's a text message, it looks like, from Tim Murtaugh who says: Jason is
17 gonna call a little after POTUS calls and run through what the plan is. When he calls you
18 guys, want to come in my office and we'll go through it?

19 And then it looks like there's another individual on the chain who's name is Matt.

20 So who was the Matt in this group chat?

21 A That would be Matt Wolking who was the deputy communications director
22 for Rapid Response for the campaign.

23 Q And when you say "Rapid Response," what does that mean?

24 A Involves any of our messaging efforts that are conducted in real-time, mostly
25 done on social media. So if the campaign had a message to get out or was going to

1 react to developments in the news, they would usually be the ones who would put
2 something out around it.

3 Q All right. And who's the Jason referenced here by Mr. Murtaugh?

4 A I believe he's referring to Jason Miller.

5 Q All right. So walk us through what Mr. Murtaugh is saying in this text and
6 what happened after the text?

7 A I don't recall this phone call, but I imagine he was saying that Jason was
8 going to give us a call after he talked to the President. I believe Jason was at the White
9 House that night, but I don't remember this phone call.

10 Q Do you recall having conversations with Mr. Murtaugh what I guess is the
11 early morning of the election?

12 A I do not.

13 Q Do you recall any tasks or plan that came out of that early morning to be
14 done the next day or going forward?

15 A I do not.

16 Q What happened after election night from your perspective, in your job as
17 director of research? Let's go to the next day. So you get up November 4th, what are
18 you doing for the campaign?

19 A I remember I slept at the office. I woke up relatively early, had not slept
20 much, and I think I waited for folks to come back in, but I don't remember -- I don't
21 remember particulars of the day after the election.

22 Q Well, let's talk more generally then. What was the next step for you? Mr.
23 Murtaugh talks about what the plan is, what do you recall that you did next for the
24 campaign?

25 A The day after the election, I really don't recall focusing on anything, in

1 particular. I remember we were all still watching returns as we saw votes come in, but I
2 don't remember -- I don't remember -- I don't recall any plan or specifics of what I may
3 have done that day.

4 Q So let's keep going that week. Tell me the next time you recall doing
5 something that week for the campaign.

6 A I mean, off the top of my head, I wouldn't be able to say this date I know I
7 did this.

8 Q Well, let's get away from the specific date, but at some point, obviously, you
9 engaged in work for the campaign, you engaged in research-related tasks, but I want to
10 get kind of timewise where does that begin?

11 A Specific to which tasks?

12 Q Post-election -- I mean, we'll get -- we'll get into this in detail, but you do
13 various research tasks related to election fraud claims that span weeks or months after
14 the election, and what I'm trying to get a sense of is, you as deputy comms director and
15 as head of research, when do you basically kick back into work gear after the election
16 results? When do you get back to work?

17 A I don't remember -- again, I don't remember specific tasks on specific days,
18 you know. Before election day, our mission for my team was pretty clear and
19 straightforward I would say. After election day, it really wasn't.

20 And so, you know, as best I recall, I sort of took tasks and responsibilities as they
21 were given to us on sort of an ad hoc basis, but I, you know, some of our junior staff I
22 know that week, there was a fraud hotline set up at some point. I know some of them
23 started staffing that. But I mean, in terms of when did things, you know, supposedly
24 ramp back up for us, I don't -- I wouldn't be able to recall a specific date or task off the
25 top of my head.

1 Q How about generally speaking that first week? So the election was on
2 Tuesday, President Biden is president-elect that Saturday or called, do you recall doing
3 anything in those days or did you not work those days?

4 A No. I was -- I can't recall for sure, but I imagine I was at the office each day.
5 I -- at some point in there, I know we looked into sort of the state of the calls of the race,
6 but, again, from that week, off the top of my head, I don't remember specific days being
7 given specific tasks.

8 BY [REDACTED]

9 Q Mr. Parkinson, let me ask sort of a similar question, but maybe a different
10 way. You said earlier that there was no post-election planning that you recalled heading
11 into election day. Did I understand that correctly?

12 A Specific to my team, the research team, yeah, I don't recall -- I don't recall
13 there being a plan of after election day, you know, you guys are going to focus on X, Y, Z.

14 Q So did you have an expectation heading into the election that your job was
15 going to change depending on the outcome of the election?

16 A As best I can recall, my expectation was that our jobs would largely end
17 around election day and that presidential campaigns after election day draw down. I
18 think my general expectation was that my team would be reduced in size at some point in
19 November and I, myself, would not have -- would not have much in the way of
20 responsibilities during that time.

21 Q Had you made arrangements for future employment? Had you figured out
22 what your plan was going to be after the election?

23 A I had not.

24 Q Okay. But I mean, what you just said makes sense if you're working on the
25 campaign, campaigns usually end, for the most part, on election day and it sounds like

1 you had that expectation for the Trump campaign?

2 A Yeah. I mean, I -- you know, I generally told folks when they asked me
3 what I was going to do after the campaign, I generally said I'm going to take a few months
4 off. So I did not have, you know -- I did not have any solid plans in place, no.

5 Q Got it.

6 And so getting back to Tem's questions about post-election work, when did
7 you -- at some point after the election, if you can recall generally, when it kicked in that,
8 hey, there's actually the campaign research work is going to continue.

9 Do you remember generally when that kicked in?

10 A As best I can recall that would have been sometime in the first, I want to say,
11 2 weeks after the election. Somewhere around then, we would've -- I know I produced
12 the documents. We would've started to field some of those requests.

13 So I don't know the specific day when we would've started working on those, but
14 sometime generally within the first 2 weeks after election day, I believe.

15 Q Do you recall a conversation with Mr. Murtaugh where he said, hey, Zach, I
16 know you're probably thinking we're shutting down, but there's more work to be done.
17 We need you to stay on, we need your team or parts of your team to stay on.

18 Do you remember a conversation to that effect in the immediate aftermath of the
19 election?

20 A I don't remember what day it was. I do remember one night I went into
21 Tim's office and I basically asked him if I still needed to be there, because I told him I was
22 extremely tired and I didn't necessarily think that there was a need for my team to still be
23 there.

24 At the time, my father was dying of cancer and he actually died at the end of
25 November. And so Tim was aware of that I think generally. I don't know if he was

1 aware of -- if I made him aware of how dire things were, but I mean, he said he still
2 needed some help and, you know, basically asked me to stay if I could.

3 I told him, you know, if he needed me I would stay, but I don't really remember
4 what day that would have been. I imagine that would have been some time within the
5 first week or two after election day.

6 Q Okay. Thank you.

7 One quick follow up on that piece. I take it after that conversation with Mr.
8 Murtaugh, you talked to folks on your team and advised them that there was going to be
9 a need for them to stay on?

10 A So I don't remember the sequencing of this. At some point before election
11 day, I know I told them all individually if they didn't know the reality of the way a
12 campaign ends and how staff are drawn down, that likely, you know, their jobs would not
13 be there at the end of November or December, whenever it might be, and that they
14 should start thinking about their next steps.

15 After the election, I think there was some back and forth about when exactly staff
16 would be drawn down and what proportions they would be drawn down in. As best I
17 can recall, I think it's November -- it would've either been mid-November or the end of
18 November, my team was drawn down from seven to three, if I remember correctly.

19 Q And the three were Dean, Jacki, and Matt?

20 A That's correct.

21 Q Okay. What were -- and I'm speaking, sort of, generally here and not -- I
22 won't ask you to pin down a particular date that this happened, but can you just describe
23 generally what the major areas of focus for you and your team were between election
24 day and early January?

25 A We -- I know off the top of my head, we did a few different things. We

1 looked into claims of dead voters, we looked into some of the allegations that were
2 circulating online about possible voter fraud, and then we -- I know there were probably
3 odds and ends we dealt with as well during that time period, too, but, I mean, in general
4 mostly related to the administration of the election and allegations of voter fraud.

5 Q And did you continue to work, sort of, at the same pace that you had been
6 working pre-election in the post-election period? I mean, was your workload
7 comparable?

8 A As best I can recall, I would say it was more sporadic. Some days were
9 busier than others. I definitely don't think it was as busy as the last few months before
10 the election.

11 Q And in terms of your team, were you also doing research on the projects that
12 your group took on or was that mostly delegated to Mr. Cleary and the others?

13 A A bit of both. There were things that I know I delegated. There were also
14 things that I personally handled. Normally, if -- even if I delegated something, I would
15 give whatever they returned to me some type of review from my end before it was either
16 distributed publicly or passed along to others on the campaign.

17 Q And how did the projects that you worked on -- and this is a compound
18 question, so just -- if you could describe generally how the process would work? How
19 did the projects come to your team? Were they usually assigned or raised with you by
20 Mr. Murtaugh?

21 A Are you talking specific to after the election or --

22 Q Yes, thank you. After the election, you've talked about a few of the items
23 that your team got involved in and I'm wondering how you came to be, sort of, involved
24 or directed to work on those?

25 A Specific to after the election, as best I can recall, the projects generally were

1 either assigned to us or requests of us, not necessarily projects that I thought up, but they
2 were not -- they were not exclusively coming from Tim and, you know, during the whole
3 campaign that was definitely not the case either.

4 We would field requests from campaign leadership, various folks throughout the
5 campaign. Specific to after election day, I know that Jason Miller certainly gave us some
6 of the projects we had to work on. I'm sure there are others, but I don't recall off the
7 top of my head.

8 Q What was Mr. Miller's title with the campaign in this timeframe just prior to
9 the election and after the election?

10 A I believe he was a senior adviser.

11 Q And where did he sit vis-a-vis Mr. Murtaugh? Was he Mr. Murtaugh's
12 supervisor?

13 A I don't know if I'd say he was his supervisor. He was -- I don't know if you'd
14 describe him as a lateral. Tim was tasked, as best as I understood it, with overseeing
15 and administering the actual communications department on the campaign. Jason's
16 role was more of an advisory role, but one that also involved liaising and working with
17 folks at the White House.

18 Q Got it. Did Mr. Murtaugh report to Bill Stepien? Was that who you would
19 describe as his supervisor?

20 A Yes.

21 Q Okay. Let's -- I want to talk briefly or just generally about the voter fraud
22 allegations that you said you were looking into that came online. Was that something
23 that you were monitoring within your team; that is, keeping an eye on social media or
24 otherwise what these allegations were and investigating them or were these allegations
25 that were brought to your attention by Mr. Murtaugh, Mr. Miller, someone else within

1 the campaign and they asked you to look into specific claims?

2 The Witness. There were certainly instances where, yeah, specific cases or
3 allegations were brought to my attention. In general, part of my job even before the
4 election was monitoring the news, social media, and so I would regularly have flagged for
5 me, you know, things that were being said on social media as things that we might want
6 to pay attention to.

7 So I know that during that period, I believe they're in some of the text messages,
8 folks from the campaign would flag individual tweets or stories that they were seeing,
9 pieces of information, things like that.

10 So to that degree, we were monitoring them, but for the most part, if we were, as
11 best I can recall, if we were producing a type of project or some type of document, it was
12 off of things that were brought to us.

13 BY [REDACTED] :

14 Q Got it. Let me -- I want to talk for a little bit about the dead voter issue.
15 And by that, I take it you mean, the concern or the claim that people were voting
16 improperly on behalf of deceased individuals. Is that what you understand the dead
17 voter issue to be?

18 A Yes.

19 Q Okay. What was -- if you recall, what was the Genesis of that project
20 from -- how did you get involved in that particular research project?

21 A I'm not sure exactly who first flagged it. As best I can remember, I believe
22 Alex Cannon, who was one of the lawyers on the campaign -- let me step back.

23 I was made aware at some point that there were -- there were instances where
24 the campaign believed that dead individuals had -- someone had used their identity to
25 vote. I don't remember exactly when I was first made aware of that. Alex Cannon,

1 the -- one of the lawyers on the campaign, I believe is the one who provided me with a list
2 or lists of possible individuals who would fit that. Dead individuals who had then had
3 their identities used to vote.

4 So I don't recall the specific first time I heard about it, but I do remember receiving
5 the project.

6 Q And what was your -- what was the task for your team?

7 A So the identities that we were given I was told were ones where we believed
8 someone who voted may have matched information I believe it was on the Social Security
9 death index. And so our job was to go through, try to look at the information of the
10 person who had voted, then look at the person who was deceased, and see if we could
11 either match them and show that this matched the information of someone who we
12 knew was dead or could show was dead or if it was a case where it might just be a similar
13 name or other some other type of mix-up.

14 So basically trying to vet and sort through those possible examples.

15 Q Okay. So you were provided lists of people who had voted or you had
16 access to lists of people who had voted in the battleground States. Is that correct?

17 A My understanding -- I was sent an Excel spreadsheet, if I remember
18 correctly, and my understanding was it was -- it was people who had voted.

19 Q Okay. And these are people who had voted and yet appeared to -- there
20 was other data that suggested that those people were deceased on election day?

21 A Correct. I believe they -- I'm not sure who did this work, but they had
22 taken this data and had tried to match it up against the Social Security death index and
23 then had asked us to try and investigate further.

24 Q Do you know what voter information was used to compile the list of who
25 had voted?

1 A I do not.

2 Q And you said that the death information came from the Social Security death
3 index, as far as you knew?

4 A As best I can recall, that's what they -- I believe that's what Alex told me they
5 had compared it against, yes.

6 Q Did you have access to any source data yourself? For example, voter lists
7 or Secretary of State information, proprietary data from the RNC, other information on
8 which you could determine whether the people who listed on the spreadsheets you got
9 had actually voted?

10 A I don't know if -- I can't remember if we used it. I believe at some point we
11 had access to the RNC's voter data, but when we looked into these individuals, as best I
12 can remember, what we spent the most time doing was trying to find the dead individual
13 and matching them against the information we had to see if the name matched, to see if
14 the address matched, things like that.

15 Q So it seems to me there's three possible sort of aspects of this that a
16 researcher might want to look at, if you're given this information that says this person
17 who voted died or had died before the election -- seems to me there's three pieces and
18 tell me if I'm getting this right.

19 One way is to confirm that, in fact, the person who's listed as voted actually voted.
20 Second is, the person who's listed as being deceased is actually deceased, and third and
21 maybe, most importantly, is that it's the same person, that they match, that it's not just a
22 question of someone with name John Smith voted and someone named John Smith died,
23 but, in fact, John Smith are the same person.

24 Have I sort of got that right in terms of the challenge of trying to verify this
25 information?

1 A I think that's -- that's probably right and, you know, as best I can remember,
2 we were mostly focused on those second and third buckets.

3 Q Okay. There's also, I guess, an issue on the first bucket of whether the
4 person cast the vote before they passed, if, in fact, it was not an in-person vote. Did you
5 come across that issue as well?

6 A I don't recall. I think -- I may have had a discussion about that, but I really
7 don't recall looking into that that much.

8 Q Okay. On what I describe or put in the third category called the third
9 bucket, the matching, the actual matching, what data did you have at your -- have
10 available to you to determine whether the John Smith listed as having voted was the
11 same John Smith who had predeceased the election?

12 A So, in general, we used public sources. So we would look for things like
13 obituaries. We also, through the campaign, had access to LexisNexis. So we would
14 look up individuals in LexisNexis to try and confirm that they were dead or that their
15 address matched an obituary, something like that, but other than Lexis, I think we were
16 mostly using those public sources. We used, you know, newspapers.com, that kind of
17 thing.

18 Q But how did that help you -- that would help you determine whether the
19 person had died and died before election day, how would that help you decide whether
20 the person who's listed on the voter roll as John Smith was the same John Smith who had
21 died?

22 A So if I remember correctly we would find things or we found things in some
23 of the examples like the person whose information we were given had a middle name,
24 you know. They were John L. Smith, and when we were looking into finding out who
25 was dead, who was dead might have been John M. Smith. And maybe the address that

1 was listed or the county that was listed for having been voted in didn't match the address
2 of the person who was dead or maybe even the State possibly.

3 So things like that, just comparing the information we were given against publicly
4 available information we could find about who the dead person was.

5 Q Did you have date of birth information on the voter side that you knew the
6 date of birth of the John Smith who had voted?

7 A I don't recall, but if we did not have that -- if that had not been provided to
8 us, the way Lexis works, Lexis often has a date of -- not a date of birth, but a month and
9 year of birth. So if we knew of a person, we could find their record in Lexis. You can
10 compare that with an obituary and you could figure out that a birth year didn't match and
11 you could -- you can raise a flag that way.

12 Q And I assume you didn't have Social Security number information for either
13 the voting list or the death index information?

14 A I don't recall, but I wouldn't believe that we would have.

15 Q And when you embarked on this project of trying to do the matching, were
16 you aware of the -- sort of the shortcomings of the data and that, for example, you might
17 have a John Smith who was born in April of 1937 and a John Smith who died who was
18 born in that same month, but not have it be the same John Smith?

19 A I assumed that Alex or whoever else had asked us to do this was aware of
20 that and that's why they asked us to sort through this so that we could weed out
21 examples that, you know, weren't -- didn't raise questions.

22 Q Okay. There's a declaration in a case filed by an MIT professor in one of
23 these post-election cases in which he said that in the State of Georgia they found over a
24 million people who shared the exact same first name, last name, and year of birth with
25 another Georgia voter.

1 Is that sort -- often sometimes called the birthday paradox type of situation.

2 Was that familiar to you at the time you were doing this work?

3 A I don't recall being familiar with that idea. I certainly knew that it was
4 possible and, again, as we went through these, we found examples where we were able
5 to say, hey, we don't think this is right, we think this is a different person. The person
6 who voted we think is alive and is in this county. The person who's dead has a different
7 name and lives in this county. So I think we were certainly aware that some of the
8 examples might not be real and that's why we were asked to look into them.

9 Q Great. Did you ever raise with Mr. Murtaugh or anyone else the fact that
10 your data was such that you really couldn't say with a certain degree of certainty that the
11 person that's listed on the voting list is the same person who died, even if you hadn't
12 found -- even for the ones that sort of cleared the hurdles that you were getting through
13 with the data that you recognized that the data itself was not really susceptible to any
14 definitive conclusions?

15 A I don't recall any specific conversations with Tim or with anyone else, but,
16 again, I assumed they were aware that we might not be able to verify with a 100 percent
17 certainty that these cases were one where a deceased person's information was used by
18 someone to vote, but that's why we were asked to look into them so we could, again,
19 weed out those cases where we could show or we could -- we thought that they were not
20 the same person or they -- yeah, they were not the same person.

21 But I -- I don't remember -- you know, I don't recall ever having a conversation
22 about necessarily the reliability of what we were being presented with other than to say
23 we're not sure that's why we would like you to look into it.

24 Q Do you know where Mr. Cannon got the information that he was sharing
25 with you, which sounds like it had been, sort of, a first cut at some of these lists? Is that

1 a fair way to characterize it?

2 A I don't recall having a conversation with Alex about where the data came
3 from. All I recall was that either he or whoever else I may have talked with the project
4 about gave me the broad parameters of what they were looking for us to do and that the
5 ultimate purpose was to share some of the examples, either with the press or to put it
6 out from the campaign ourselves.

7 Q After the information was provided to you, did you understand Mr. Cannon
8 to have a continuing role in trying to do the vetting or the matching, or had he sort of
9 passed that project along to your team?

10 A I don't recall if Alex may have been involved beyond just providing us the
11 information.

12 Q Do you know if -- and I'm stepping back here speaking more broadly from
13 just this dead voter project, do you know if Mr. Cannon was working on sort of research
14 and vetting of election fraud claims in the same timeframe that you and your team were?

15 A I don't recall having a specific conversation about what he was doing,
16 although I can say that I just remember, in general, that I thought our election team
17 was -- or our, excuse me, our legal team was basically working on nothing but election
18 integrity projects post-election.

19 Q What did you understand the election integrity projects to be that the legal
20 team was working on?

21 A Again, just very broadly, my understanding was the lawsuits that were being
22 filed, the legal efforts that the campaign was mounting.

23 Q Okay. How about specifically digging into or analyzing particular claims of
24 election fraud? Was that something that you thought Mr. Cannon or others on the
25 team were working on, on the legal team?

1 A You know, as best I can recall, that's something I would've assumed that the
2 legal team was handling since, again, they were the ones presenting our case in court
3 usually or were, I guess, outsourcing the work to lawyers who were presenting it in court.

4 So that would be my understanding but, again, I don't recall any specific
5 conversation with Alex or other members of the legal team and them telling me specifics
6 of what they were doing.

7 Q You mentioned earlier a fraud hotline being set up after the election, was
8 that something that was set up by the legal team?

9 A I don't -- I don't think -- I don't remember who set that up. I'm not sure.

10 Q I didn't mean to cut you off.

11 A No. I don't think I know who did set that up.

12 Q Was your team involved in, sort of, staffing that hotline or taking
13 information from that hotline?

14 A Members of my team were, although that would be expected because I
15 think most of the junior staff at the campaign headquarters were staffing it.

16 Q And I think this is implicit in one of your recent -- an answer just a minute
17 ago, you didn't have any conversations with Mr. Cannon about what he was finding in
18 terms of -- in connection with his efforts to vet voter fraud claims that were coming into
19 the campaign?

20 A I don't -- I don't recall -- I don't recall specific conversations with Alex about
21 what he was doing around this, other than really what I said, which is the broad purpose
22 of the project and kind of my team's purpose in that.

23 Q So, for example, do you ever recall Mr. Cannon telling you, other than in
24 relation to the dead voter issues that we've talked about, that he was not finding credible
25 evidence to support the various election fraud claims that he was investigating or words

1 to that effect?

2 A I don't recall a conversation to that effect, no.

3 Q Let's go through a few documents that relate to the election fraud -- I'm
4 sorry -- the dead voter investigations and I think they focus mostly in Pennsylvania and
5 Georgia. [REDACTED], if we could bring up exhibit 1.

6 Are you able to see that, Mr. Parkinson?

7 A Yes.

8 Q Okay. So if we can scroll down to the November 7th email, which is the
9 first email in the chain. And it appears to be an email from Mr. Cannon. You're not
10 copied on this, but Mr. Cannon to Jared Kushner, Eric Trump, Bill Stepien, and others
11 regarding Pennsylvania death data. Do you see that?

12 A Yeah.

13 Q And then -- and I don't want to scroll back up. I want to stay where we are,
14 but Mr. Miller then forwarded that email to you the next day and looks like he got you
15 started on looking into the Pennsylvania information. Do you recall that? Do you
16 recall getting this email, having this forwarded to you?

17 A I don't recall getting the email, but I mean, I think this fits with what I
18 was -- with my general recollection about the project, yeah.

19 Q So in the email from Mr. Cannon that's on the screen in the second sentence
20 that's still the first line of the email, it says: The QC process took the potential dead
21 voters from around 130 down to these 15 confirmed.

22 Do you know what Mr. Cannon's referring to there as the QC process?

23 A I don't think I do, no.

24 Q Did you understand that he had some team or was working with some
25 outside vendor to try to identify solid claims where there might be credible evidence that

1 a person had voted in the name of a dead person?

2 A I don't recall specifically, but I do remember, again, just kind of assuming
3 that Alex was not the one who was necessarily generating these lists, but I don't recall a
4 discussion about who specifically was doing something like this QC process.

5 Q Okay. If we could -- let's take a look at exhibit 1A, which I believe is the
6 attachment to Mr. Cannon's email and then became the attachment to Mr. Miller's email
7 to you. And it's not in a really helpful format here. We can't see -- apparently, there's
8 some highlighting that we can't make out, but does this look familiar to you? Have you
9 seen a spreadsheet like this before?

10 A I mean, if this was produced, this looks like what we might have received,
11 yes.

12 Q And on page 2 of this exhibit 1A, just because of the way it was produced, it
13 looks like there's some columns that maybe would've appeared on the far right of a
14 spreadsheet. Does that appear to be the case?

15 A Yeah. I mean, that looks -- I believe that looks like what we would have
16 been handed, yeah.

17 Q And I believe that the top row -- well, the top row seems to suggest some of
18 the sources of data that were used to compile this spreadsheet. Is that right?

19 A I don't --

20 Q So for instance --

21 A I don't know about sources.

22 Q Yeah. Let me be more specific. That was a terrible question.
23 In that top row, for example, there's a column that says SSDI, DOB, bureau-DOB?

24 A Yes. So I would assume that's the Social Security death index.

25 Q Okay. And what do you understand bureau to be?

1 A That I don't know. That I don't know.

2 Q Okay. Back to exhibit 1, Mr. Miller at the top email in that document, Mr.
3 Miller asked you if you could please fill in the gaps here and noted that the plan was to
4 start highlighting one obituary a day of dead people who voted.

5 What did you understand your task to be in terms of filling in gaps?

6 A Yeah. As I mentioned, my general recollection is that we wanted to -- the
7 campaign wanted to look at these examples and possibly publicly highlight specific
8 examples. Again, it seems like here Jason was suggesting we would put something out
9 from the campaign which I think we eventually did.

10 My understanding -- my recollection is that our role in that was, again, to sort
11 through the examples that we were provided and try to vet them and then hopefully also
12 provide evidence if we were going to put it out publicly that the information we had of a
13 voter matched someone who was deceased.

14 Q Okay. And if we take a look at exhibit 2, looks like you asked Mr. Miller
15 what information specifically he was looking for, and he responds: Obituary or other
16 things that says move, maybe that's a typo, prove death. Do you see that?

17 A Yes.

18 Q So was it your understanding that Mr. Miller here is asking you to focus on
19 making sure that we are able to establish that the person had, in fact, died before the
20 election?

21 A I'm sorry. Can you repeat that question?

22 Q What he was focused on here was establishing having you help establish that
23 the person had, in fact, died prior to the election?

24 A That would be my understanding, yes.

25 Q And if we can go to exhibit 4, and we'll come back to three, but four it looks

1 like it was a combined analysis that you or your team did with Georgia and Pennsylvania.

2 So I want to look at that and then we'll go back and look at the Georgia information.

3 This is your response to the email we just looked at from Mr. Miller, and you got
4 back to him within less than a day at 3 o'clock in the morning, at 3:30 in the morning, and
5 shared what you had been able to find with respect to both the Georgia and Pennsylvania
6 data you had been provided. Is that right?

7 A That's what it looks like, yeah.

8 Q When you said of the 27 names and I'll represent to you that it looks like the
9 Pennsylvania list that we had just looked at had 15 names and then the Georgia list had
10 another 12, and you've now referred to those as the 27 names on the spreadsheets. Is
11 that consistent with your recollection?

1

2 [11:09 a.m.]

3 A I mean, I don't really recall this exchange, but that makes sense, yeah.

4 BY [REDACTED]:

5 Q Okay. And then you said, of the 27, we've been able to find something
6 solid on 13 of them. Do you remember what that -- what you meant by that?

7 A I don't -- again, I don't remember this email, but I know we produced at
8 some point a document or documents with info on, I believe, either those 13 cases or
9 cases like those where we -- we had evidence that the information we'd been given on
10 spreadsheet, those names matched someone who we believed we could show, from
11 public information, we could show that they were, in fact, deceased.

12 Q And when you reference in this email that there -- on this other 14 there
13 may be errors and others we just haven't found anything, what kind of errors were you
14 finding or did you find when you looked through these initial lists that were provided to
15 you by Mr. Cannon? Is it the stuff you were referring to earlier about names not quite
16 matching up?

17 A Yes. I don't -- again, I don't remember the specific ones that we may have
18 pulled out, but some of the information not matching. Again, that could be a name, a
19 date of birth, or a date of death -- or really just a date of birth, I guess. And then some
20 of these, as I recall, we couldn't really find anything on. So I think, if I remember
21 correctly, we left some of these out because they may have been in the Social Security
22 Death Index, but we couldn't find a public obituary or a tombstone, something like that
23 that we could show that the person was dead. So for some of them, it might have just
24 been that we couldn't confirm outside of the death index that they were dead.

25 Q Got it. And had you been led to believe that the Social Security Death

1 Index wasn't necessarily always accurate?

2 A What do you mean by "led to believe"?

3 Q Well, did you come to the belief that that was not a source that could be
4 trusted without some sort of confirmation?

5 A I mean, I don't know -- I don't recall what I was thinking at the time. I'll say
6 as a research person, I know that with public records you can find mistakes and errors.
7 And so that's why with something like this we would try to go through and, again, find if
8 we're able to multiple sources that we can tie together. So I don't know if I -- I don't
9 recall any specific thoughts about the death index at the time.

10 Q Okay. And let's take a quick look at exhibit 3, which I referenced earlier. I
11 just had a couple questions about Mr. Cannon's email in that document.

12 This is the document that refers to the Georgia voters, that were then combined
13 in the -- in your response that we looked at as exhibit 4.

14 [REDACTED], if you could scroll down a little bit to the 11:30 a.m. email. That's the
15 one.

16 So this is an email from Mr. -- well, Mr. Cannon, I guess, sent it to himself, and
17 then it was forwarded to you by Mr. Miller. And you see there's the reference to 12
18 deceased individuals from Georgia. See in that the first line?

19 A The first line is not showing up for me.

20 Q Okay. It's --

21 A I see that.

22 Q Attached is the Georgia data?

23 A Yes, I see that, yeah.

24 Q Okay. And the second sentence of that -- of that email, it's bolded and
25 underlined. It says, "We do not know whether these individuals voted for Biden or

1 Trump."

2 Was that something that you were trying to get your arms around at any point in
3 this project?

4 ████████. Let me ask a quick question, because the version I'm seeing
5 is -- looks like either text is missing or -- oh, there it cleared up. Okay. I guess it was
6 just something to do with the scrolling. Sorry.

7 ████████. No problem.

8 BY ████████:

9 Q Do you see the bolded and underlying, is that coming through clearly on
10 your end? Mr. Parkinson?

11 A It is, yes. I can see it.

12 Q And is that -- is the issue of whether the vote -- the individuals had voted for
13 Biden or Trump something that you were asked to try to determine in the course of your
14 work?

15 A I don't recall, although I would imagine we could only establish party
16 registration. I don't think there would be a way outside of maybe data modeling to -- to
17 figure out who someone might have voted for outside of their party reg. So I don't -- I
18 don't recall -- I don't recall looking into that.

19 Q Do you recall either former President Trump or Rudy Giuliani ever making
20 claims that there were thousands of dead people who voted for Joe Biden or trying to
21 attribute the supposed dead voters to Biden votes?

22 A I don't recall specific claims, but I know that at some point Rudy did -- did
23 push the idea of dead voters, yes.

24 Q And was the point of the communications effort here to suggest that, in fact,
25 these people who had illegally voted on behalf of deceased individuals were casting votes

1 for Biden?

2 A My understanding of the point of the project was that there was a desire to
3 have specific examples of possible voter fraud and that some of the allegations that were
4 out there were either presented as statistical anomalies or, you know, individual
5 incidents, but that what they wanted to show was that there were specific cases that
6 people could look at where there was possible voter fraud. I don't recall if there was a
7 emphasis on who they may have voted for.

8 Q Okay. Let's take a look at exhibit 5. And for this one, [REDACTED], if we could
9 scroll down to the first in time email which is from Robert Farley to Mr. Parkinson on
10 November 9th.

11 Mr. Parkinson, do you remember getting this email from Mr. Farley, who appears
12 to be either a journalist or someone affiliated with an organization called FactCheck.org,
13 asking about statements that Lindsey Graham made on Maria Bartiromo's show?

14 A I don't remember this email, but -- but I would have been the point of
15 contact for various media fact checkers. So I know Robert -- Robert emailed me
16 somewhat regularly on the campaign, but I do not recall this specific email.

17 Q Do you know -- do you know -- do you recall anything about Lindsey
18 Graham's statements on FOX and you being asked to research those or to fact-check
19 them yourself?

20 A No, I don't -- I don't recall this request.

21 Q If we go to the first email in this chain, it's from Mr. Cannon to Matt Morgan
22 and others. I don't believe you're copied on this, but Mr. Cannon notes for Mr. -- I guess
23 Mr. Murtaugh, he's one of the recipients and he's referenced, it looks like, in the first
24 word of the email, it says, Tim, I provided that information to Senator Graham, per Trump
25 family instructions, and it is 100 percent accurate.

1 Do you recall whether you played any role in coming to that or assisting with that
2 conclusion that the claims made by Mr. -- by Senator Graham on Maria Bartiromo's show
3 were 100 percent accurate?

4 A No, I don't -- I don't recall that. I don't recall being involved in that, no.

5 Q Let's take a look at exhibit 6. This is an email from Mr. Miller to you, and I
6 think it touches on a point that you just made a few minutes ago regarding party
7 affiliation.

8 Do you recall Mr. Miller asking you to do what you could to figure out the party
9 affiliation of the folks that you had identified as having votes cast on their behalf after
10 they died?

11 A I don't recall this. But, I mean, that makes sense, yeah. We can normally
12 look up party ID with our resources or we could, excuse me, look up party ID with our
13 resources.

14 Q And Mr. Miller said that he'd much prefer to announce dead Democrats who
15 are voting, it says, of possible. I assume he means if possible. Do you see that?

16 A I do.

17 Q And was that part of your task is to try and figure out if -- if some of these
18 people for whom votes were -- deceased individuals for whom votes were cast were
19 registered Democrats?

20 A I mean, I don't recall if that was asked at the outset. I would assume that if
21 Jason was asking me afterwards, then we had not sorted that previously. But I don't
22 remember when specifically we may have looked up party registration or if we did that in
23 all the examples.

24 Q Okay. Let's take a look at exhibit 7. And this is an email from you. The
25 version that we have has a -- what looks like a truncated version.

1 If we scroll down a little bit, [REDACTED], just so we can see the top of it. Yeah,
2 that's good.

3 A truncated version of what looks like a larger spreadsheet. Does this look
4 familiar to you? And if we have to scroll down a little bit more so you can see it, it might
5 be helpful. Does that look familiar to you, Mr. Parkinson?

6 A Some of these names look familiar, yes.

7 Q But how about this, this format of the truncated spreadsheet that's in this
8 email?

9 A I mean, it would look to match the -- the other exhibit you showed me.

10 Q In your email, you say -- scroll back up a little bit -- that in process of going
11 through these, weeded out a couple more where voter reg stuff didn't match what we
12 were looking for or where we couldn't find voter reg at all.

13 Do you remember what you meant by that?

14 A I mean, based off the prior email, I would take that to mean that I'd been
15 asked to weed out examples where the voter registration was not -- where the voter
16 registration might have been Republican or where there was no voter registration
17 information available on what party they may have registered with.

18 Q Well, you say in the first part that -- that you had forgotten or didn't realize
19 that Georgia didn't have traditional party registration, so everyone's unaffiliated. So am
20 I right to -- to conclude from that that for the Georgia voters at least, you were not
21 making any representations about their party affiliation because that data just doesn't
22 exist?

23 A I mean, I really don't -- I don't recall this email, but I would -- I would read it
24 that way, yes.

25 Q And I'm not -- the reason I point that out, because I was wondering whether

1 the voter registration stuff that's referenced in your email might relate to, for example,
2 the voter registration date, or voter registration information, date of birth, or something
3 other than party affiliation.

4 Is that ringing a bell? I'm just trying to jog a memory here, if it helps.

5 A I mean, that, I don't recall. I would -- the way I would read this is that we
6 took out some more examples that didn't match, I guess, what Jason had been looking
7 for, which is that they were looking for examples of possible Democrat registered voters.

8 Q Got it. Got it. And am I to -- as we put these sort of exhibits, the ones
9 we've looked at, together, it appears that you got lists from Mr. Cannon that had already
10 been reviewed by someone and prepared. And that as you and your team did your
11 work, you were sort of winnowing down from that list to a core smaller list of folks that
12 you felt comfortable or confident someone had voted on behalf of a deceased individual.

13 Is that a fair characterization of what we're seeing sort of over the course of these
14 few emails we've looked at?

15 A Yes. Although I would say it was examples where we were confident that it
16 raised enough questions. I'm not sure I would say that we proved it. And I don't recall
17 ever saying that we have proven that these individuals are there, more that these are
18 individuals where we have enough evidence where we believed that it matches and it
19 raises serious questions.

20 Q And would be sufficiently -- have been sufficiently vetted to make its way
21 into a press release, which is where this was headed?

22 A Correct, yes.

23 Q And if we look at exhibit 8, it looks like we're finally -- we're getting down to
24 sort of the list of folks that you were comfortable moving forward with. And there's an
25 email from you at the top there to Jason Miller and others: Mr. Murtaugh, Andrew

1 Clark, Matt Morgan. And it says, "Gonna give Alex a ring, he asked us to hold."

2 Do you remember being asked by Alex Cannon to hold off on releasing this
3 information or make -- issuing a press release until he had some chance to review or
4 make further comments or edits?

5 A No, I don't recall that phone call, no.

6 Q So on the same document, if we scroll down a little bit, it might shed a little
7 bit of light on this. It's an email from Matt Wolking at 3:03 p.m. to you. And it says,
8 "Thanks" -- I'll wait till you're there.

9 "Thanks to Zach for drafting the bulk of this. Still waiting on Alex Cannon to
10 confirm these people voted/registered."

11 Does that ring a bell, refresh your recollection as to a concern that Mr. Cannon
12 might have had regarding this proposed press release?

13 A No. I don't recall this email.

14 Q Okay. I want to skip ahead to exhibit 19. And it appears that some
15 version of the press release that we just -- the draft that we looked at went out. And
16 there's an email from Daniel Dale to Mr. Murtaugh, which he then forwards to you, asking
17 for a response from the campaign with respect to one of the voters who's listed in the
18 press release, a Deborah Christiansen. Do you see that?

19 A Yes.

20 Q Do you remember after the campaign issued a press release regarding
21 Georgia voters and the sort of winnowed down list that you had come up with that there
22 was some further fact checking that was done by media outlets and others regarding the
23 names that were listed?

24 A I don't recall this inquiry, but I remember there were inquiries in general
25 about some of the -- at least some of the Georgia examples. This Deborah Christiansen

1 one, I vaguely remember getting inquiries about it, but I don't remember what our
2 pushback may have been. The other one that I believe was raised was -- I could have
3 this wrong -- was Linda Kessler I think was the other example. And I think it was a
4 Georgia news outlet that looked into that one and claimed that we had it wrong there as
5 well.

6 But I don't know if it was just those two, but I remember there were a couple of
7 inqui- -- at least a few inquiries around these, yes.

8 Q And when the inquiries came in, did you dig back in or have your team dig in
9 to try to confirm that the information that you had was solid?

10 A I don't remember the specifics of what we did. I know that at some point I
11 talked with Matt about this. And I think I repulled the information we had to compare
12 what the inquiries were suggesting. But outside of that, I don't really recall a lot of
13 specifics there.

14 Q Take at look at exhibit 20, which is in response to a different media inquiry,
15 but it appears to maybe capture some of the -- sort of the upshot of your further
16 investigation.

17 This is an inquiry from The New York Times. It relates to, I think, the same press
18 release. And it calls out or raises concerns about three of the four voters that were
19 listed: Christiansen, Blalock, and Kessler.

20 Do you see that in Mr. Alba's email to Mr. Murtaugh?

21 A Yes.

22 Q And then you responded with your thoughts regarding those three names,
23 correct?

24 A That's what the email looks like, yes.

25 Q And do you remember concluding that there were issues with Mr. -- well,

1 Blalock and Christiansen?

2 A I don't remember this, but the Kessler one, I -- like I said, I do remember that
3 one, because we thought that the Georgia outlet that reported on it was the -- was wrong
4 and that their information didn't match what we had. The Blalock one I don't recall, but
5 obviously I wrote the email. And then I don't recall, outside of what I'd said about
6 having a general conversation with Matt at some point, I don't recall this.

7 Q Do you know -- and with Kessler, I think the issue was there was a Linda
8 Kessler, spelled L-i-n-d-a and a Lynda Kessler, spelled L-y-n-d-a. and that they had been
9 confused or mismatched. And, in fact, the Kessler that had died was not the same
10 Kessler who had voted.

11 Do you recall coming to that -- ever coming to that conclusion?

12 A As far as I remember, I remember we -- we thought we had it right on that
13 one, and that it was the outlet who had it wrong, and that there was another individual
14 whose name did match. But I don't know if that ever got resolved, I don't remember.

15 Q And on Blalock, the situation was it was a woman who voted as Mrs. James
16 Blalock and her husband, James Blalock, had passed, but she was the voter. Do you
17 recall that being the situation there?

18 A I don't recall that specific one, but if it's in that email, then I sent it.

19 Q And that for Deborah Jean Christiansen, it turned out that there were two
20 Deborah Jean Christiansens, and one had -- one woman had passed and the other was
21 still alive and had voted. Do you remember that being the upshot of that one?

22 A I remember something along these lines that we were -- there was
23 pushback, that we were unsure. It wasn't -- I mean, the way I'm reading this email, it
24 doesn't seem like I thought we were truly disproven, just that we might not have had
25 enough info.

1 Q Well, and that's what I want to -- that's what I want to get at. As this
2 fact-checking was rolling in, do you ever come to the conclusion that, hey, we just don't
3 have enough data to really be definitive on this stuff because we're seeing false positives
4 here, or we're seeing issues where the data we have shows a match, but in reality, there
5 isn't a match?

6 Do you ever remember sort of having that thought when the fact-checking was
7 rolling in after the -- these are your best cases and they were sort of shot down by fact
8 checkers?

9 A I don't know if I ever -- if I ever said we don't have enough. I probably
10 would have phrased it as we can't prove definitively just using open sources from, you
11 know, the campaign headquarters.

12 But, I mean, as I recall, I tried to be careful in how I represented this so that I was
13 not overselling necessarily what we had produced.

14 Q And from your perspective, you were identifying cases that, based on the
15 public information that you had available to you, appeared worthy of further
16 investigation. Is that a fair characterization of what you saw as your role?

17 A That's what I remember as being our kind of broad -- the broad argument
18 that I thought we were trying to advance, yes.

19 Q And you understood that there were limitations in that data and you could
20 not -- you could not definitively say that the people who you -- who were on these lists
21 had, in fact, voted after dying?

22 A I'm sorry, can you repeat that question?

23 Q Yeah. You understood that there were limitations in the data such that you
24 could not definitively say that even for the people you put forward in the press releases,
25 that someone had voted for that person after they had died?

1 A Yes. I don't recall if I -- how I may have expressed that to others as part of
2 this project. But in general, part of my job was to try to accurately describe what we
3 could or could not prove with open source information.

4 Q And I'm not being critical of you here by any means, so I don't want you to
5 take it that way. But did anyone -- did Mr. Murtaugh or Mr. Miller ever come back to
6 you after this fact-checking was coming in and say, hey, Zach, you told me these were the
7 solid ones and it turns out they're wrong, what are you guys doing, or words to that
8 effect?

9 A I don't recall a conversation like that, but they -- they could have.

10 Q Do you remember there being any frustration within the campaign comms
11 folks about the fact that where this is not looking good, that the names that we're putting
12 forward as our best examples are coming back and that maybe they're wrong?

13 A I mean, I remember personally being generally frustrated, but that was also
14 sort of broadly part of my frustration at the time after the election, just being very tired,
15 but I don't know if I expressed that to others. But I can only speak for myself, I recall
16 being a little frustrated, yes.

17 Q Do you recall anyone ever saying, you know, let's pull this dead voter
18 project, this is not -- we clearly don't have the information we need to be able to make
19 definitive statements about what's happened?

20 A I don't recall. And I don't -- I don't really recall how the project ended
21 either.

22 Q And we saw in an early email there was a suggestion that this would be an
23 ongoing process, where there would be a press release every day or every few days sort
24 of rolling out another so-called dead voter. That didn't happen, did it?

25 A As best I can recall, we put out -- we put them out in batches, I believe, by

1 State. I don't know if we -- if we did do them on a rolling basis. We may have done
2 that on Twitter or through social media. But I recall, I believe there are press releases
3 we did featuring these examples.

4 Q And you don't recall anyone ever saying, you know, let's just stop, this isn't
5 working, or words to that effect?

6 A I don't recall a conversation like that, no.

7 Q Let's take a look at exhibit 12. And this is an email chain in the same
8 general timeframe relating to, I believe -- well, it's the Georgia press release, we can see
9 on the email that's on November 11th at 8:20 a.m. from Jason Miller. It references the
10 Georgia press release, but then also sort of turns attention to running Michigan data.
11 Do you see that?

12 A I do.

13 Q And it looks like Mr. Miller's asking Andrew Clark in the second part of this
14 email after -- he addresses a point to you, looks like, regarding -- I'm sorry, not to you, to
15 Mr. Cannon regarding Michigan data. And then to Mr. Clark he addresses a question, it
16 says, "header/subheader needs to make more clear that this is just the tip of the iceberg,
17 per POTUS. Does this work?"

18 And he appears to be referring to the heading on the Georgia voter press release.

19 Do you see that?

20 A I do.

21 Q Do you -- and I realize you didn't write this email and this comment wasn't
22 directed to you, but do you know what he's referring to when he says this needs to make
23 more clear that this is just the tip of the iceberg, per POTUS?

24 A I don't -- yeah, I don't.

25 Q Are you aware of any discussions or communications with the President

1 regarding the work that your team was doing with respect to dead voters?

2 A I don't recall specific communications there. I wouldn't have -- you know, I
3 wouldn't have been on them. If there was a conversation about something the
4 President had told Jason or something that Jason had told the President, I really don't
5 recall that.

6 Q Did anyone ever tell you -- other than this reference in this email, did anyone
7 ever tell you that your work -- that the President had comments about the projects -- the
8 project that you were working on with respect to dead voters?

9 A No, not that I recall, but I wouldn't be surprised if he did. I know that from
10 time to time work we produced on the campaign made its way in front of him. But I
11 don't recall that, no.

12 Q And what I have in mind, anything from, you know, someone saying, you
13 know, the President thinks this is really important so we need do it, or, the President
14 loves the work you've done, or, he wants to take it in a different direction. You know,
15 any sort of reference to the fact that he was aware of this particular work that you were
16 doing?

17 A Not that I recall, no.

18 Q Okay. Have you ever talked to the President -- former President?

19 A I have been -- not one-on-one, let me put it that way. I have been in a
20 room with the President, I don't know, six, seven times, maybe something like that.

21 Q And I realize you worked in the White House for a period of time. During
22 the timeframe that we're focusing on this morning, which would be from the
23 election -- generally, from the election to the end of the term, did you have any -- were
24 you in the President's presence at any point?

25 A If I remember correctly, I think the President came out to the election

1 headquarters I think the morning of the election. But outside of that, I don't think so,
2 no. And that would have been when -- if that was the day before the election or the day
3 of the election, that would have been with all of the campaign staff, just to be clear.

4 Q Okay. I'm going to -- just a few more questions on these types of issues.
5 Let's take a look at exhibit 13. This appears to be -- and, [REDACTED], we can scroll down
6 maybe to the first in time email.

7 It appears to be the Pennsylvania version of the press release we saw earlier with
8 respect to Georgia. Does that look familiar to you?

9 A I don't recall this, but that is -- that looks like our campaign press release
10 format, yes.

11 Q And if we go down to the bottom of that email, there are three names listed.
12 And to your point that you raised earlier, it says, Here are several examples in
13 Pennsylvania that should be investigated.

14 Right? That's how -- that's what you understood was happening here, that you
15 were raising names that you felt there was enough evidence that you came across based
16 on public information that warranted further investigation.

17 A Yes. My recollection is that, from my end, I perceived what we were doing
18 as vetting these examples to come up with ones that we felt were solid enough to
19 publicly say they required more investigation.

20 Q And there are three names here, which I presume those were your three
21 best in Pennsylvania that you came up with after the vetting and all the work that you'd
22 done that we've been talking about for the last hour or so?

23 A Yeah. I don't recall these examples specifically, but I would assume if they
24 are the ones that we put in the release, they would have been our strongest ones, yes.

25 Q And do you recall ever finding other examples, besides the ones that were

1 listed in the press releases, that you felt were more compelling and stronger than even
2 the ones that you had listed?

3 A I don't recall that.

4 Q Okay. Do you have any understanding as to what happened with respect
5 to the three -- whether there was any -- did you ever get any further information with
6 respect to the three names that are listed in this press release, Mr. Granahan, Ms. Presto,
7 and Ms. Bartman?

8 A There may -- I don't really recall followup, but as with the Georgia examples,
9 we may have received media inquiries later on about it, but I don't remember specifics
10 there, no.

11 Q Did you ever learn that there were criminal prosecutions that came out of
12 the votes with respect to Ms. Presto and Ms. Bartman?

13 A I don't think I recall hearing that, no.

14 Q Did you ever hear that Ms. Bartman's son had pled guilty to voting in her
15 name after she died?

16 A I mean, that sounds familiar, but I don't specifically recall, no.

17 Q Or that Ms. Presto's -- I believe it was her husband who voted in her name
18 after she passed?

19 A No, I don't think I recall hearing about that, no.

20 Q And that they both -- both the relatives of both those individuals said that
21 they voted for President Trump. Have you ever heard that?

22 A It sounds familiar, but, again, I don't recall specifically hearing that, no.

23 █ Any further questions on the -- before we move on?

24 Q Mr. Parkinson, are you doing okay? Do you want to take a short break or you
25 want -- can you keep going?

1 The Witness. I'm fine.

2 BY [REDACTED]:

3 Q I'm sorry, I got out of sequence here. I want to ask you about some work
4 that you did in connection with Dominion Voting Systems. Do you remember being
5 involved in some research regarding that company?

6 A Yes.

7 Q Do you remember where the assignment, the initial assignment came from
8 with respect to Dominion?

9 A If I remember correctly, it would have been from Jason Miller.

10 Q What do you recall about the initial assignment?

11 A This was in the days after the election where there was a lot of
12 allegations -- or there were a lot of allegations floating around online. Some of them
13 pertained to Dominion. And I recall Jason asking me to basically look into what was out
14 there and to try and separate -- basically, separate what might be real from what wasn't.

15 Q Take a look at exhibit 16A. Oh, you can't -- we'll have to -- sorry, we'll bring
16 it up for you.

17 This is -- I believe it's a 14-page, I think I've got it right, 14-page -- it might be
18 longer than that. Might be closer to 20-page memo that says Dominion Voting Systems
19 top lines. It says updated November 12th, 2020.

20 Do you recognize this document?

21 A This -- this looks like the document that we -- that we produced, yes.

22 Q Who prepared this?

23 A The initial review of information, I believe, was done by Dean Cleary. I
24 believe Jacki and Matt also worked on it, but I'm not sure. And then I reviewed and
25 edited it before passing it back along.

1 Q Who did you pass it on to?

2 A I believe Jason. And if I recall correctly, Bill Stepien and I think Justin Clark.

3 And I believe it was all in one email.

4 Q Not Mr. Murtaugh?

5 A He may have been on it as well, but I -- I don't recall. But he -- he very well
6 likely may have been on it as well.

7 Q I don't think we have an email from you passing it along. Do you recall
8 what your -- actually, I take that back, it's right in front of me.

9 Let's look at exhibit 16. And this is an email some of the folks you
10 mentioned -- actually, it's not Miller or Stepien or even Clark. We have Andrew Clark on
11 here, it's Matt Wolking and others. And it looks as if you forwarded to them just the
12 first three pages, the top-line information from the memo.

13 Do you remember sending it to those folks -- or sending this email to those folks?

14 A I don't remember sending this email, no.

15 Q Okay. I don't think we have the email from you transmitting the longer
16 memo or anything to Mr. Jason Miller, Justin Clark, or Mr. Stepien.

17 Do you recall what -- what, if anything, you sort of said to them about the
18 conclusions that you -- that your team had reached with respect to Dominion?

19 A I believe all the email really said was here's the info we found. But outside
20 of that, I don't really recall much about the email.

21 Q Do you remember any discussions regarding the research that had you done
22 with respect to Dominion?

23 A With anyone on the campaign?

24 Q With the three people you mentioned: Mr. Miller, Mr. Stepien, and
25 Mr. Clark.

1 A I don't believe I ever talked with Justin or Bill about it, which would make
2 sense. I didn't interact with them on a daily basis. I don't know if they even saw it.
3 And, again, that's just as best I can recall, they were also on the email. Jason, I think he
4 may have acknowledged that he saw it, but I don't recall a conversation with him about it,
5 no.

6 Q In the email that we do have, to Mr. Wolking and others, you say, referring
7 to the top-line summary, runs through what's real and what's not.

8 What did you mean by that?

9 A There was a lot of -- there was a lot of -- in the days after the election, there
10 were a lot of theories and claims circulating online. Some of them were ones that, you
11 know, from a computer with just using open source information can't necessarily prove
12 one way or the other. Other ones were things that, you know, we could basically say
13 this contradicts what -- what we can publicly find.

14 And so, you know, in terms of what's real and what's not, you know, I think I was
15 trying to say that some of these claims -- there's an email to, I believe, mostly
16 communications folks -- some of these claims were probably not ones that they would
17 want to repeat publicly.

18 Q And at this point do you know where either President Trump or Rudy
19 Giuliani or others affiliated with the Trump election challenge effort were making claims
20 about Dominion?

21 A I don't -- I don't recall what specifically I was aware of at the time or who
22 specifically was making them, just that they were generally out there. I think Sidney
23 Powell may have been making claims about this around this time, but I -- I don't recall
24 specifically when they may have made those claims, no.

25 Q So when Mr. Miller asked you to sort of look into Dominion claims, did he

1 give you a list of claims that he wanted you to research? Or how is it that you knew
2 what you were taking -- which claims were you tackling?

3 A As best I can recall, I don't -- I don't believe Jason sent us a list of claims. I
4 believe we just looked around to try to find things that were circulating and then to look
5 into those claims. But I don't recall being told to look into specific allegations.

6 Q Do you remember whether you looked -- you personally looked for the
7 claims that were circulating and then tasked Mr. Cleary and others to investigate, or was
8 part of their role to find the claims that are being made about Dominion and also to
9 address whether they're real or not?

10 A I don't recall if I looked into them before passing on the request. But I
11 would have looked -- I remember, obviously, looking through the claims and what we had
12 prepared and editing it before we sent it back.

13 Q And you don't recall any discussion or any reaction from Mr. Miller,
14 Mr. Stepien, or Mr. Clark once you had sort of laid out for them what was real and what
15 was not with respect to Dominion?

16 A I don't recall any follow-up discussion with them, no.

17 Q How about subsequently, in the ensuing days and weeks, do you recall
18 discussions with either Mr. Stepien, Mr. Clark, or Mr. Miller about the fact that Dominion
19 claims that were -- that you had determined not to be real were continuing to be
20 promoted?

21 A I don't recall any conversation to that effect, no.

22 Q There was a press conference on November 19th, which is a week after -- a
23 week or so after this memo was prepared at which Rudy Giuliani and Sidney Powell made
24 several claims about Dominion Voting Systems that were contrary to what you had found
25 in the memo. Do you remember that press conference?

1 A I do.

2 Q Do you remember having any reaction to hearing what Mr. Giuliani and
3 Ms. Powell were saying at the press conference?

4 A I mean, my best recollection, I broadly recall not really thinking it was -- not
5 thinking it was a productive press conference.

6 Q Did you share that belief with anyone?

7 A I may have. As best I can recall, I believe I shared that sentiment with my
8 wife, and I -- I may have discussed that with other -- other communication staff, but I
9 don't recall specific conversations.

10 Q You don't -- you never said to Mr. Murtaugh or anyone sort of -- sort of high
11 up on the communications team that this can't happen, these are false claims that are
12 being made, we know it, we've researched these, and that the President's lawyers are
13 saying this on national television?

14 Mr. Warrington. I'm going to object here because this is -- he just said he didn't
15 recall what he did. And now we're loading up a question with a lot of prefatory
16 language, Matthew, there's a different way to answer it that might illicit a more clear
17 answer --

18 [REDACTED] Sure, sure. Let me rephrase it.

19 BY [REDACTED]

20 Q Do you recall ever saying words to the effect to Mr. Murtaugh, Mr. Stepien,
21 or Mr. Miller that this -- this is not right, this shouldn't be happening, we've already
22 researched these things and found them not to be true, and yet here the President's
23 lawyers are saying them? Do you ever convey that type of sentiment to any of those
24 individuals?

25 A I -- Tim -- Tim, I'm sure at some points -- I shouldn't say I'm sure. I would

1 imagine, as best I can recall, I probably did say to him at some point that I didn't think
2 some of the things that were being said about Dominion were things that we could
3 substantiate. I don't know if I ever had any conversation with Bill Stepien in the weeks
4 after the election. I don't believe I did. And then, was the third person Justin Clark?

5 Q Yes.

6 A I don't think I had a conversation with him either. I don't recall that. I
7 may have. I don't know if I did talk to him in the weeks after the election, but I don't
8 recall a conversation specifically where Dominion was mentioned.

9 Q Do you recall how Mr. Murtaugh reacted when you shared with him that you
10 did not think that the -- the information that was being put forward about Dominion
11 could be confirmed?

12 A I mean, I don't recall a real specific discussion about Dominion. So, I mean,
13 I don't -- I don't recall a reaction from him. So I'm not real -- I'm not really sure there,
14 no.

15 Q And even if you don't remember specific words that he used, do you
16 remember whether Mr. Murtaugh agreed with you, disagreed with you, or expressed any
17 views on the subject?

18 A Specific to Dominion?

19 Q Yes.

20 A I mean, I don't remember specific discussions with Tim about Dominion, no.
21 I -- could it have come up in a discussion? I imagine it probably did at some point, but I
22 don't recall a specific interaction around him.

23 Q Take a look at exhibit 17. And this appears to be -- well, this is an email
24 from Mr. Cleary to you, copying Mr. VanHyfte and Jacki Kotkiewicz. And it looks like
25 there was -- that perhaps you had tasked them with a follow-up to their -- to the

1 Dominion memo that we were looking at earlier, 16A.

2 If we scroll down to the sort of middle of this document, [REDACTED].

3 And it's the email from Mr. Parkinson to Matt, Jacki, and Dean at 6:06 p.m. Do
4 you see that? It says, "Needs to look at these questions." Obviously, this is some
5 conspiratorial stuff, but we need to be thorough and track it down. The two attached
6 JPEGs have the background on this, quote, "theory," close quote.

7 You see that part of the email, Mr. Parkinson?

8 A I do.

9 Q Do you recall there being sort of follow-up questions that you had for your
10 team to look into after they had produced that Dominion memo that we looked at a few
11 minutes ago?

12 A No, I don't think I recall this, no.

13 Q Then I take it you wouldn't have any recollection of who proposed these
14 questions or these bullet points that you forwarded on to the team?

15 A Can I see the rest of the email?

16 Q Sure.

17 A I'm sorry. Yeah, further.

18 Q Scroll down. Yeah. If we go down from -- on the 6:06 email, there's some
19 bullet points about Smartmatic, and you could scroll down from there.

20 A Yeah, I'm not -- I don't remember where -- if this is something that I followed
21 up with or if this was something that I was asked to follow up with, I don't remember.

22 Q Do you -- in the part of the email that I read a few minutes -- just a minute
23 ago, you said, "Obviously, this is some conspiratorial stuff." Do you remember what you
24 meant by that?

25 A Some of the allegations that were swirling around Dominion, maybe not all

1 of them, but some of them were certainly hard to believe on their face, like the claim that
2 votes were sent overseas to Spain was one that struck me as, you know, far-fetched.

3 Q Okay. And we scroll up a little bit further in this email chain, you say at the
4 9:53 -- in your 9:53 p.m. email -- so this is, oh, 3.5 hours or so, a little more than 3.5 hours
5 after you had sent the request on to the team. You said, "Let's cut this off at 10:30.
6 Have more dead voters we'll need to get to in the morning."

7 Do you see that?

8 A I do.

9 Q Do you recall -- and this is after the press releases we had looked at for
10 Georgia and Pennsylvania. Do you recall, was the, quote, dead voter work continuing?
11 It appears to have been continuing at this time into, you know, at the end of this week,
12 that Friday, November 13th.

13 A I mean, I don't recall -- I don't recall the sequencing of that project versus
14 this Dominion project, but I would assume that voters -- more dead voters is referring to
15 that larger project we were previously discussing.

16 Q And so I just want to circle back on the dead voters piece for a moment. It
17 looked like you got spreadsheets from Mr. Cannon with respect to Georgia and
18 Pennsylvania. And you did the work that we talked about to try and narrow those down
19 to the solid choices or the solid examples that needed further investigation, correct?

20 A I would say that's correct, yes.

21 Q Do you recall that they were -- that spreadsheets continued to roll in on a
22 periodic basis that you would then farm out to your team, or is it the data came in early
23 and you were still kind of working through it in the ensuing days and weeks?

24 A If I recall correctly, I don't believe we were given all the spreadsheets at
25 once. I believe they came in on a rolling basis. But exactly how long that continued for

1 and over the timeframe, I'm not really sure.

2 Q Are you able to estimate the number of hours that were spent collectively
3 among your team members researching these dead voter claims?

4 A No, I don't think I'd be able to give an accurate estimate.

5 Q Are you able to estimate approximately how many dozens or hundreds
6 of -- of dead voter claims your team evaluated, just order of magnitude?

7 A Order of magnitude, I don't believe it would have been more than -- as best
8 as I can remember, it would've been on the order of dozens. I don't think we got -- I
9 don't think we ended up going past, you know, 60 or 70 maybe.

10 Q Sorry, I didn't want to cut you off.

11 A No. I mean, I don't recall with any specifics if -- I do not recall doing
12 hundreds, let me put it that way.

13 Q It looked like maybe Mr. Cannon or his expert or his QC team had started
14 with more, but by the time it got to you, it was probably no more than 60. Is that fair to
15 say?

16 A Based off that email, yes. I don't believe I ever saw a list that was an earlier
17 version of the ones that were sent to us.

18 Q Okay. All told, are you able to describe approximately how many instances
19 you identified where you were confident that a vote was cast on behalf of a deceased
20 person?

21 A That, I don't recall. Although I would -- I would say that the ones that went
22 out in press releases would represent, you know, a good portion of those.

23 Q And we've already sort of discussed the fact that several of the names that
24 went out in press releases turned out not to be cases where a vote was cast on behalf of
25 a deceased person. Is that right?

1 A At least in the one case, based off the email, sounds like what I was looking
2 at at the time, I thought that we could cross that example off. So at least in one case.

3 Q And that was Blalock?

4 A I believe that was the name, yes.

5 Q And you're not sure on Kessler -- you believe Kessler was correct, and
6 Christensen you're not sure on?

7 A Yes. I don't recall the resolution with Deborah Christiansen. I remember
8 at the time going back through Linda Kessler's information, comparing it to the Georgia
9 outlet that said they had followed up, and disagreeing with their conclusion and thinking
10 that we -- that they were making a mismatch, not us.

11 Q So you said that the press released names were probably the bulk of the
12 ones that you felt confident were instances where a vote was cast on behalf of a
13 deceased person, right?

14 A Yeah, I would say -- I don't know if it's a bulk; it's a good number. I would
15 say it's not -- you know, there's not multiples of that number that we -- that we had, I
16 don't believe.

17 Q So would you say -- is it fair to say that you had fewer than 10 that you felt
18 confident were situations where a vote was cast on behalf of a deceased person?

19 A I don't remember exactly how many we ended up putting in the press
20 releases. I would say it's -- you know, as best I can recall, it would be somewhere in the
21 range of a dozen to two dozen. Something like that.

22 Q Well, I think in the press releases, there were either three or four in
23 Pennsylvania and four in Georgia.

24 A Yeah. Whatever the number in the press releases were, those would have
25 been the bulk of the examples, I believe.

1 Q Were you aware in November and December of 2020 that Rudy Giuliani was
2 claiming that there were tens of thousands of fraudulent votes cast for Joe Biden in the
3 name of dead people?

4 A I may have heard that specific claim. I don't recall hearing it. I know that
5 he -- I know that he made it at the time. I don't recall when I was aware of it.

6 Q Were you aware in November and December of 2020 that President Trump
7 was claiming that there were tens of thousands of fraudulent votes cast for Joe Biden in
8 the names of dead people?

9 A I don't recall the magnitude, but I know that he was saying, yes, that there
10 were dead voters for Joe Biden.

1

2 [12:08 p.m.]

3 The Witness. I don't recall the magnitude, but I know that he was saying, yes,
4 that there were dead voters for Joe Biden.

5 BY ████████

6 Q Thousands of them, right?

7 A I don't recall the magnitude.

8 Q Okay. Do you know what evidence that Mr. Giuliani or former President
9 Trump were relying on to make those claims?

10 A I do not.

11 Q Based on the extensive research that you and your team did, did you believe
12 that there was evidence that there were tens of thousands of fraudulent votes cast for
13 Joe Biden in the name of dead people in the 2020 election?

14 A At the time?

15 Q Correct.

16 A I don't know. I know that we were asked to look into those specific
17 examples and just off of those specific examples, that is what we could -- that is what we
18 could weed it down to, but I don't -- I don't know if at the time I believed what type of
19 magnitude there might be.

20 Q Did you tell senior members of the Trump campaign team that you were
21 only able to confirm a dozen or fewer instances where votes were being cast in the
22 names of dead people?

23 A I don't recall putting it in that type of language, but obviously in the emails
24 you showed me, you know, I put forward the names that I thought were -- were solid
25 examples to question.

1 Q And you also shared with senior people within the Trump campaign that you
2 believed that other examples that were put forward were not solid?

3 A Again, not in those words. People who were on those emails would've
4 seen me say that we weeded out some of the examples and didn't think that they were
5 solid to publicly push them.

6 Q Did you ever work with a company called Simpatico Systems?

7 A I don't recall ever working with a company by that name, no.

8 Q Was one of the claims -- I'm moving on to a different issue here than the
9 dead voters. Was one of the claims that you looked into or vetted, a claim that in
10 Pennsylvania there were more votes than voters?

11 A I don't recall the specifics, but I believe at some point I looked into claims
12 that there were more votes than registered voters in some State. I'm not sure if it was
13 Pennsylvania.

14 Q Take a look at exhibit 21. Thanks, [REDACTED].

15 There's an email towards the bottom. It attaches Jason Miller sends on a -- he
16 refers to it as a flier that Mayor Giuliani used at a hearing in Pennsylvania, and Jason
17 Miller asks: Are we able to prove any, all caps, any of these claims? Our
18 substantiation is pretty thin and nobody can seem to remember who did the initial
19 tabulations here.

20 Do you remember being asked to look into any of these claims?

21 A No. This broadly, I think -- I think this broadly corresponds with what I
22 remember having to look into this at some point.

23 Q And then there's an email on November 29th at 9:30 that says what appears
24 to have happened here is that the numbers cited on the flier from the primary election
25 were from the primary not the general election, and that whoever prepared that flier was

1 comparing the number of ballots requested during the primary with the number of
2 ballots that were returned during the general election.

3 Is that your recollection of what happened here?

4 A So I don't remember this email. If I have this date right, this would have
5 been the day that I returned from Maine and I believe my father died the next day. So
6 there's a very real possibility that I was not looking at these emails.

7 Q Okay. Okay. Let's put that one to the side. Let's look at exhibit 24.

8 There's an email on November 15th, from Mr. Cannon to you and others on the
9 15th at 6:18 p.m. Do you see that?

10 A I do.

11 Q And Mr. Cannon asked if you could call him as soon as possible and you said
12 you just tried him. It relates to -- the email relates to a Rudy transcript, it says, of Mr.
13 Giuliani on Maria Bartiromo's show.

14 Do you remember what this is about?

15 A I'm not -- I'm not sure. I think at some point -- this may be this, I think I was
16 asked to pull a transcript for this appearance. I think -- but I don't recall this phone call
17 or this email.

18 Q Do you remember why you were being asked to pull a transcript?

19 A I think he -- I'm not sure on this. I think he had made some claims in the
20 interview that I don't know if it was Alex or somebody else wanted to see what they
21 specifically were.

22 Q Take a look at exhibit 25, which is a text -- series of texts that you produced, I
23 believe, with Alex Cannon, yeah, and including a text exchange on the morning of the
24 16th, which would have been the morning following this 11:46 p.m. email that we just
25 looked at, okay?

1 So I'm not -- I want to get your recollection of whether you think the text sort of
2 corresponds to the inquiry that Mr. Cannon was making the night before. Do you see
3 that?

4 A It would -- yeah. It would seem to correspond, yes.

5 Q Okay. Does this text exchange prompt a memory for you as to what the
6 nature of the request was?

7 A Yes. So I think at some point I had to -- I think we had to pull a list of the
8 claims that Rudy and maybe Jenna Ellis and I believe Sidney Powell were making publicly
9 about election integrity.

10 Q Were you given any more details in terms of what the purpose of that
11 project was? You described what you were tasked to do, but what the, sort of, goal of it
12 was?

13 A I mean, I don't recall, but I, you know, I know who Eric Herschmann is. I
14 don't really recall what I was thinking at the time, but I'm sure I thought it was to look
15 into what they were saying.

16 Q In the next page of this same exhibit is a text exchange with Hillary
17 Parkinson.

18 Who's Hillary Parkinson?

19 A That's my wife.

20 Q Okay. And do you -- it looks as if you're having exchange here with her in
21 roughly the same time frame, and she starts on November 17th by saying: Bob is
22 wondering if there are any updates on the Dominion election drama.

23 Do you know who she's referring to as Bob?

24 A She's referring to her boss, Congressman Bob Gibbs.

25 Q And then she says: Like the drama isn't real or there are no updates, after

1 you said: Yeah, still not real. Actually, let me start with that. What did you mean
2 when you said "still not real" in response to her inquiry about Dominion election drama?

3 A I don't remember specifically sending this text, but I imagine I was telling her
4 that I didn't think the narrative that was developing around Dominion was something that
5 should be pushed publicly.

6 Q Okay. And she suggests -- and I'm not going to go deeply into this, so I just
7 want to sort of skim past this piece, but she suggested that her boss was listening to Rudy
8 and you respond JFC and then say: Tell him not to do that. Our own lawyers say he
9 shouldn't be listened to.

10 A What were you referring to there?

11 A I mean, as I recall around that time on the campaign, I don't know who I was
12 referring to specifically by "our lawyers," because I don't recall this text exchange, but I
13 know that the other comms staffers on the campaign that I talked to thought that Rudy
14 and Jenna's public efforts were not helpful to our case.

15 Q And I take it from the next -- the next page, but a continuation on that text
16 message. I take it that you were getting the same information from the lawyers or same
17 view from the lawyers regarding Sidney Powell?

18 Q Go down a little bit further, [REDACTED], maybe the next -- it's the next page of the
19 document. There we go. Thank you.

20 A Is that what you're conveying there, Mr. Parkinson, that the lawyers also believed
21 that people shouldn't be listening to Sidney Powell?

22 A I don't know if I'm specifically conveying that the lawyers said that, but I
23 think I was -- based off of the text message, I think I was saying was that Sidney Powell
24 was not someone that her boss should echo.

25 Q And you came to that conclusion based on what?

1 A Based off of at the time -- again, I don't recall the specifics of this, but at the
2 time as best I can remember, what she was saying publicly was not helpful to the
3 campaign's legal efforts in the wake of the election. I don't remember thinking that she
4 was helpful.

5 Q And when you say "she wasn't helpful," did you mean that her statements
6 were false?

7 A I don't know if I specifically meant that. In general, I thought that the way
8 she was presenting claims and the way that her claims were being covered were not
9 helpful to the campaign or its legal efforts.

10 Q Did you believe that they were false?

11 A I don't know if I believed they were false. I don't know if I had looked -- I
12 don't know if I looked into all of them, but I remember thinking that it was not helpful.

13 Q Did you believe that certain of the claims that she was making regarding
14 Dominion were false?

15 A I'm not -- again, I don't recall, but if I had looked into specific claims,
16 obviously, that document has things that I thought we could either substantiate or not
17 substantiate, and if she was saying things that were contrary to that, I'm sure my
18 conclusion was that it was not correct and was not helpful to the campaign.

19 Q And did you believe that Mr. Giuliani was making claims that were not
20 correct regarding Dominion?

21 A I didn't closely -- I don't recall closely tracking everything he was saying, but,
22 again, if it was something in that document that we had looked into and I felt we could
23 not substantiate and he was saying it, I would've thought that that was not helpful to the
24 campaign.

25 Q Well, you did not believe that the millions of votes were switched, right?

1 A I did not -- again, as best I can recall when we looked at those allegations, we
2 could not substantiate them and some of them we questioned the sources that were
3 being relied on for those allegations.

4 Q In your text message to your wife, you said: I mean, they didn't switch
5 millions of votes. You believed that millions of votes had not been switched, right?

6 A Based off that text message at the time, no, I did not believe that.

7 Q Sorry. I think I might have a double negative there. You did not believe
8 that millions of votes had been switched, correct?

9 A Based off what I'm saying in that text message, yes, that is correct.

10 Q And Mr. Giuliani was saying that millions of votes had been switched, wasn't
11 he?

12 A That -- I don't recall his exact claims, but if that is something he was saying
13 then, yes, I would've disagreed with that.

14 Q Take a look at exhibit 26. This was a document that was produced by you
15 or by your counsel and it appears to be a 17-page document that maybe runs out of the
16 request that we looked at earlier from Mr. Cannon, and it appears to list some voter fraud
17 claims by Rudy Giuliani and then the last several pages are voter fraud claims by Sidney
18 Powell.

19 Do you remember this document?

20 A I don't recall the specifics of putting it together, but I remember at some
21 point being asked to put them together, yes.

22 Q Am I correct that this document, sort of, came out of the assignment or the
23 request that we looked at a few minutes ago from Mr. Cannon?

24 A I don't recall if specifically it came out just of that request, but I would
25 imagine it would match up.

1 Q So what he called in his text message the Rudy and Sidney Powell project,
2 you think this relates to that project?

3 A I would -- I would assume that that is what this is referring to, yes.

4 Q And in this document, it appears that you are listing statements or claims
5 that were made, but there's no effort, at least in this document, to confirm or deny or
6 refute those claims.

7 Am I reading the document correctly?

8 A I haven't read through this whole document, I don't think, since it was
9 produced, but as I recall, yes, we were just gathering the various claims that they were
10 making not background information on those claims themselves.

11 Q At some point, were you or your team asked to gather that background
12 information or to express a view as to whether the claims -- any of the particular claims
13 were true or verifiable?

14 A That I don't recall.

15 Q Any questions on that? Just a couple more things and then I'll be wrapping
16 up, Mr. Parkinson.

17 So take a look at exhibit 27. There's a text exchange with Mr. Wolking, Mr.
18 Murtaugh, and it appears that Jason Miller is on this chain, but he doesn't, sort of,
19 respond in the time frame that I'm looking at. So this is the November 16, which is
20 roughly the same time frame we were just looking at regarding the Rudy and Sidney
21 Powell project.

22 Do you remember this exchange with Mr. Wolking and Mr. Murtaugh?

23 A I do not, no.

24 Q And just for your reference, exhibit 28 -- sorry. It's challenging here with
25 the electronic exhibits to sort of flip back and forth, but, [REDACTED], can we take a quick

1 look at exhibit 28? That's the tweet that is referenced in exhibit 27 in your -- in Mr.
2 Wolking's -- Mr. Wolking's text references this tweet. Okay. So just to get you -- sort
3 of your bearings on this.

4 You with me?

5 A Yes.

6 Q Okay. So in the tweet, the person references Sidney Powell released an
7 explosive affidavit on November 16th from a whistleblower regarding election software
8 manipulating votes without a trace.

9 Mr. Wolking sends that to you, Mr. Miller, and Mr. Murtaugh. Mr. Murtaugh
10 responds: Do you see that?

11 A No, I don't see the response.

12 Q Sorry. Can we scroll down just a little bit there? Perfect. Thank you.
13 Keep going down so we see the next one as well, the other direction. Got it. Perfect.

14 So you see Mr. Murtaugh responded: It seems the fact that there's no evidence
15 is the evidence.

16 Do you know what he's talking about there?

17 A I don't remember the specifics of this affidavit episode, but if I remember
18 correctly, I believe Sidney Powell had this produced and then afterwards the -- what she
19 was suggesting somehow collapsed. The affidavit didn't turn out to be what she claimed
20 it was, if I remember correctly. And I may not be remembering that correctly.

21 And I think Tim is just expressing -- again, I don't recall this text message, but
22 I -- knowing Tim I imagine he is just expressing frustration with -- with that.

23 Q And then you respond to that, what did you mean by in your response that
24 this entire thing is a horror move where the call is coming from inside the house?

25 A I mean, as I previously said, I did not think that what Sidney Powell was

1 pushing publicly was helpful to the campaign and, again, I don't remember the specifics of
2 this, but I imagine I was saying that what was happening was damaging to us and that was
3 something that was being pushed by someone who was affiliated with the campaign,
4 Sidney Powell.

5 Q Take a look at exhibit 29. And this is from an earlier timeframe. This is
6 the Sunday after the election and it seems -- the folks on this text chain -- someone
7 named Andrew. Do you know who that refers to? Is that Andrew Clark?

8 A Andrew -- I don't see his name, but if it's a text message between Matt and
9 Tim and myself, I would imagine that's Andrew Clark, yes.

10 Q Can we scroll all the way to the top which lists the participants in this chain,
11 even though they're not on the page we have here, we don't have anything from Andrew
12 or Francis, but can you just tell us who those folks are?

13 A That should be Andrew Clark and Francis Brennan.

14 Q And Matt is Matt Wolking and Tim is Tim Murtaugh, correct?

15 A That's correct.

16 Q So we do have on this page that we've made exhibit 29, we do have just Mr.
17 Murtaugh and Mr. Wolking. I don't see that you're responding here at all. Do you see
18 Mr. Murtaugh's comment in the middle: Matt Morgan wants to see the whole clip
19 because he's been told that Rudy said wildly inaccurate and indefensible things. Do you
20 see that?

21 A I do.

22 Q Was that an issue in terms from the research team's perspective, from
23 shortly after election day, was there an issue with trying to fact check or stay apprised of
24 inaccurate comments that were being made by Rudy Giuliani?

25 A I don't know if I would say it was a problem for the research team. I know

1 that there were times when Rudy or Jenna would or Sidney Powell would say things, and I
2 got the sense that they were not claims that had been vetted through either -- that had
3 not been vetted by others on the campaign.

4 Q And was Mr. Wolking spending a fair amount of his time as the Rapid
5 Response person dealing with false or exaggerated claims by Mr. Giuliani?

6 A I couldn't tell you -- I couldn't tell you how Matt proportioned his time.

7 Q Did he ever share concerns or complain to you about the fact that he was
8 spending a fair amount of his time running down or addressing exaggerated or false
9 claims by Mr. Giuliani?

10 A I don't recall a conversation to that effect. Yeah, I don't recall a
11 conversation to that effect.

12 Q Do you remember any conversation among the comms team
13 expressing -- where anyone expressed frustration about the inaccurate or exaggerated
14 claims of Mr. Giuliani?

15 A I mean, I -- outside of the text messages that I produced, you know, I don't
16 recall specific conversations, but I think it's -- I can only speak for myself, but I know that
17 it was frustrating to me.

18 Q Take a look at exhibit 31. You produced this document. Do you
19 remember where you got it from?

20 A Could you scroll down?

21 Q It's a 21-page document. The version that we have from your production
22 includes comments that I believe to be from your team members, and I want you to
23 confirm that, identifying various inaccuracies or questions that are raised in this
24 document.

25 Do you remember it?

1 A I do not -- I do not remember this document.

2 Q I'll also represent to you that we have a version of this document that has
3 metadata suggesting that Cleta Mitchell was involved in the preparation of this
4 document. Do you know Ms. Mitchell?

5 A I know of her, but I do not know her personally.

6 Q Do you recall Ms. Mitchell or Mr. Miller ever sending you a document that
7 sort of looked like this that talked about five States and illegal votes and asked you or
8 your team to review it?

9 A I don't -- I don't recall -- I don't recall being asked to review it, no.

10 Q We can -- [REDACTED], can we just scroll through and stop when we see a
11 comment bubble? There's several of them.

12 I know you've not seen this document before, Mr. Parkinson, but do you have any
13 understanding of who DC1 might be who is commenting on this document?

14 A Can you zoom in on the comment? I can't really make out --

15 Q If we can. Thank you, [REDACTED].

16 A I don't -- I don't know this. I mean, obviously DC could be Dean Cleary, but
17 I do not know if that's him.

18 Q Okay. I'll represent to you -- and it's a little tricky working with the
19 electronic document -- that there are also comments from MV and from JK, and those are
20 the only initials that we see in the comments on this document.

21 Would that suggest to you that those are your team members -- Dean, Jacki, and
22 Matt?

23 A Yes.

24 Q But you don't have any recollection of having them go through a document
25 that sets forth election fraud claims in the various battleground States and asks them to

1 fact check it?

2 A No, but can I ask what the date is on this?

3 Q The date on the cover sheet is December 8.

4 A And do you know when we would've been asked to review this?

5 Q That's what I'm trying to find out from you as to who sent it to you, when
6 you were asked to review it.

7 A So if it was December 8th or around then, that is the week after my father
8 died and I imagine that's around -- I don't remember the exact date, it's around the date
9 of his funeral. So I'm not surprised that I do not remember.

10 Q Okay. I understand. Understand. Okay.

11 And so I take it you wouldn't know -- well, you haven't seen the document or you
12 don't remember seeing it, so you don't know what was done with it after the comments
13 were made?

14 A No, I don't recall working with this document, no.

15 Q Okay. Let's look at exhibit 22. This is document from later in December.
16 And if we could scroll down a little bit to the 8:58 p.m. email from Mr. Miller to Mr. Clark,
17 Mr. Morgan, Mr. Cannon, yourself with copies to Mr. Murtaugh and Mr. Stepien.

18 And the email describes certain fraud allegations and Mr. Miller says in that 8:58
19 p.m. email: Lawyers, comma, Zach, need you guys to glance at the below talkers and
20 the attached compendium of credible, provable examples of voter fraud that we can
21 backup with affidavits or public sourcing. This will be distributed publicly.

22 Do you recall getting this document from or this email from Mr. Miller?

23 A I don't recall this email, but I -- I vaguely think I remember the document.

24 Q Do you know why Mr. Miller was asking you to review talking points?

25 A In this specific instance, I don't. It would not have been uncommon for me

1 to review talking points before they went out, though.

2 Q And there's -- Mr. Miller refers to a list of -- the list as a compendium of
3 credible, provable examples of voter fraud. And I know it's difficult -- and we can scroll
4 through the document to see if it helps you answer this question. Do you know whether
5 any of these claims that were listed here are claims that you had previously vetted?

6 A I don't recall vetting these specific examples. It's not to say the team may
7 not have, but I don't recall.

8 Q And there's a section entitled, "Dominion machines." Do those claims or is
9 that claim regarding Michigan seem familiar? Is that something you had looked into?

10 A I don't -- I don't remember if -- I don't remember if we looked into it formally
11 or if we looked into it informally at some point. I don't -- I don't believe that was in the
12 Dominion document we produced earlier. I may have looked into that at some point,
13 but I don't recall the circumstances.

14 Q Okay. If we go back up to the beginning of that same email -- actually, go
15 back to the very beginning of the document, your email in response. You say: Notes in
16 the attached. Nothing major. And I'm assuming most of these can be substantiated in
17 affidavits or other materials legal team may have.

18 What do you mean by that, the second -- the second part of that second sentence
19 that you're assuming most of these can be substantiated?

20 A So the way that our research worked, we were, you know -- we looked
21 through open source information to try and gather information and figure out whether or
22 not certain claims could be substantiated or cannot be substantiated. That's the general
23 process, right?

24 Just because we could not necessarily substantiate something doesn't necessarily
25 mean that someone else could not. You know, we didn't run investigations where we're

1 out interviewing people or going on the ground to collect information. You know, that
2 was generally not our thing.

3 So if there were specific claims that we were making in court and that we, you
4 know, members of the legal team said they had affidavits or other evidence to
5 substantiate, you know, I generally took the position, as best as I can remember, to defer
6 to that.

7 Because, you know, if someone told me a specific voter fraud case occurred in
8 Pennsylvania, I cannot necessarily find that just looking online and looking through
9 publicly available sources, but someone may have an affidavit attesting to that or some
10 type of other evidence suggesting that that I do not have access to.

11 And so in a case like this, if there is a legal document, I generally assumed that the
12 lawyers of the legal team were the ones who would be able to substantiate those claims.

13 Q So you weren't in a position to sort of vouch for these -- the claims that had
14 been made in legal filings?

15 A I would say that's a fair characterization.

16 Q And that you're sort of making that disclaimer in this email saying you're not
17 seeing anything that -- nothing major that's troubling, but also you're just -- you're
18 operating under the assumption that there would be affidavits or other evidence to
19 substantiate?

20 A Correct.

21 Q Anything else on any of this? Okay.

22 BY [REDACTED]:

23 Q Mr. Parkinson, just a few follow-up questions. [REDACTED], if you can go
24 quickly to exhibit 25 which we already looked at. It's an exchange with Mr. Cannon and
25 then there's also an exchange with, I believe, your wife Mrs. Parkinson. What platform

1 were these messages in?

2 A These text messages?

3 Q Yeah. It doesn't look like iMessage, for example. So I'm just wondering
4 where you're texting --

5 A Everybody uses iPhones. This is an Android.

6 Q Okay. Got it. And is that -- did you use any other types of applications to
7 communicate with your colleagues on the Trump campaign such as Signal or WhatsApp,
8 Telegram?

9 A Not that I can recall during this period. I would've used my -- I had a
10 campaign phone, so there may have been text messages to the campaign phone, but I
11 have no access to those. Email was largely -- email and personal text message, I believe,
12 were the ways I think the vast majority of our communications happened and then phone
13 calls.

14 Q Okay. So you don't recall this time period -- I'm mainly focused
15 November 2020 to January 2021 using applications like Signal or Telegram, Whatsapp?

16 A No, I don't -- if I recall correctly, I didn't -- I didn't use any of those types of
17 messengers during that period, no.

18 Q And going back a little bit, we had discussed Dominion in that project that
19 you and your colleagues worked on, and I just want to confirm my understanding. Is it
20 that -- you said you could not recall what prompted that request from Jason Miller related
21 to looking into Dominion, certain Dominion claims?

22 A I don't know specifically -- I don't recall specifically, but I do believe it was
23 related to the idea that a lot of these claims were circulating online and even potentially
24 by some campaign allies and there was a request to just get a general understanding of
25 what was being claimed and what could or could not be substantiated.

1 Q And would those campaign allies have included Rudy Giuliani and/or Sidney
2 Powell?

3 A I don't recall mentions of specific individuals, but I assume it could include
4 them.

5 Q And did you say you do not recall what was done with the information that
6 you provided to Mr. Miller and others, meaning that memo?

7 A I don't recall -- I don't recall a follow up from Jason or -- or other folks, no.

8 Q Do you know whether Mr. Miller or anyone on the campaign ever conveyed
9 the information from that work product to anyone in the White House?

10 A I do not.

11 Q Do you recall after you prepared or you and your colleagues prepared that
12 document regarding Dominion, whether you received any instructions or guidance about
13 what claims the campaign should or should not make pertaining to Dominion?

14 A Can you repeat that question?

15 Q Yeah. After you and your colleagues prepared that Dominion work
16 product, do you recall receiving any guidance from anyone at the campaign relating to
17 what claims the campaign could or could not make or should or should not make
18 pertaining to Dominion?

19 A You mean like from a superior about what we should or should not say?

20 Q Yeah. Like, okay, maybe we should avoid in a press release claims that
21 Dominion stole all these votes, anything -- any sort of guidance about parameters on
22 what we can say about Dominion?

23 A I don't recall guidance to that effect, no.

24 Q ██████████, I believe, talked -- asked you about conversations that you had
25 with the President during this time period, November 2020 and January 2021. Do you

1 recall any discussions with Mark Meadows from the White House?

2 A I don't think I've -- I don't think I've ever had a discussion with a conversation
3 with Mark Meadows. It is very possible during this time period that I may have been on
4 emails with various individuals. So just let me qualify with that, but I don't recall having
5 a conversation with Mark Meadows, no.

6 Q Did you have any understanding as to his involvement in the campaign, in
7 the November 2020 and January 2021 timeframe?

8 A I mean, I don't recall thinking about his potential involvement other than at
9 the time he was still the White House chief of staff, I believe.

10 Q Do you recall ever being told that any of the information that you and your
11 colleagues were doing on the research side that the information was being conveyed to
12 Mark Meadows?

13 A I don't recall anything to that effect, no.

14 Q It's not a document that you've produced to us, but I was wondering if
15 you're familiar with reports that it had been prepared by Peter Navarro during the
16 post-election time period pertaining to the election? Are you familiar with any of those
17 reports?

18 A I believe I've seen the reports you're referring to, yes.

19 Q Do you remember ever being asked or you or your colleagues on the
20 research team being asked to fact check any of the claims made in any of the Navarro
21 reports?

22 A I don't -- I don't recall being asked to do that, no.

23 Q So you don't remember ever looking into any of the claims and conveying to
24 anyone like Tim Murtaugh or Jason Miller whether there's any basis or validity to any of
25 the claims being made in those reports from Peter Navarro?

1 A We may have, I just don't remember specifically looking into claims being
2 told -- I don't remember specifically being told here are claims Peter Navarro is making,
3 look into them. I may have, but I don't recall them.

4 Q Do you remember ever using any of Peter Navarro's reports as a source to
5 say that a certain claim was true?

6 A I don't recall that, but it could be possible.

7 Q Do you have any understanding as to the work that Peter Navarro was doing
8 during the November 2020 and January 2021 time period pertaining to the election?

9 A I don't -- I'm sorry. Could you repeat that question?

10 Q Did you have any understanding as to any work that Peter Navarro might
11 have been doing pertaining to the election in the November 2020 to January 2021 time
12 period?

13 A I don't recall if I was aware of those reports at the time. I remember he
14 was one of the surrogates that was out on TV, and so I may have heard what he was
15 saying, but I don't recall specifically looking into his reports, no.

16 Q Do you recall interacting with Mr. Navarro at all during this time period
17 related to the research that you were doing pertaining to certain election fraud claims?

18 A I don't -- he had come to the campaign a few times. I don't believe any of
19 those visits were during the post-election period. It may have been, but I don't recall
20 meeting with him during that time frame, no.

21 [REDACTED] Just one more thing on Dominion, on the Dominion report.

22 BY [REDACTED]:

23 Q Mr. Parkinson, Mr. Giuliani has testified under oath regarding that report. I
24 see you nodding your head. Are you familiar generally with what Mr. Giuliani had to say
25 about that Dominion report?

1 A Yes, I am.

2 Q Okay. And one of the things that he said was that it seemed like a
3 corporate document that was done for Dominion to cover its -- to cover its ass is the term
4 he used. I don't know why I'm being so shy today.

5 He also said that -- that the campaign research team wasn't smart enough, didn't
6 have the time to have done such professional work, and that's led him to believe that it
7 was done by Dominion?

8 Do you -- I take it Dominion -- no one from Dominion participated in any of the
9 work that you put together for that report?

10 A No, although I believe we used Dominion materials as sources for -- for some
11 of that, but no, I don't -- we did not talk to anyone from Dominion, no.

12 Q Any other response or reaction to Mr. Giuliani's characterization of that
13 report or your team and how they could've or did prepare that document?

14 A I don't think I've ever met or had a conversation with Mr. Giuliani. I may
15 have been on an email with him at some point, but other than that, no, I don't have a -- I
16 haven't discussed it with him, so I don't really have a reaction to what he said.

17 Q And when he said that the research team were half asleep, he caught one of
18 them under their desk one day. Is there any truth to that?

19 A If there is, no one ever alerted me to it, so, no, I don't -- I don't believe any of
20 my staff ever slept under their desks during work hours.

21 [REDACTED]. Anything else? Okay. Well, thanks, Mr. Parkinson. Why don't
22 we -- can we go off the record?

23 [Recess.]

1

2 [1:41 p.m.]

3 BY [REDACTED]:

4 Q We will go back on the record. It's 1:41.

5 Hi. Mr. Parkinson, we'd like to switch gears a bit and talk a bit about the
6 research team's role with fundraising emails.

7 So let's break this up into two sides. Let's start with pre-election and tell me
8 what role you and the research team played with regard to fundraising emails and texts.

9 A Generally, our role when it came to fundraising emails and texts was to
10 approve them for the communications team. There's approval process for those when
11 they were proposed. They would have to be circulated and I believe the campaign legal
12 team or a lawyer was usually on those as well, and we would review them for messaging
13 consistency, sometimes we would review them for factual accuracy, and then we would
14 provide the communications approval for those.

15 Q Now, when you say you would review them for factual accuracy sometimes,
16 can you please expand on that?

17 A So most -- you know, from my recollection and what I would characterize
18 them as, most political text messages and fundraising emails are political rhetoric, and so
19 a lot of them don't necessarily require fact checking.

20 You may have an instance where fundraising email, you know, says that the
21 unemployment rate is X and we would step in and say that's actually last month's
22 number, you need to use Y.

23 So things like that. There might be -- some of it might just be messaging
24 consistency. We were sending a message that talked about the cost of a plan. You
25 know, we might say the cost for that policy proposal is \$32 trillion, not 12, not 50. Use

1 that number, because it is consistent with our other messaging efforts.

2 Q All right. So let's go back to the -- you mentioned political rhetoric that
3 may not require fact checking. How would you determine when something required
4 fact checking versus when it did not?

5 A I mean, often it's, in my opinion, sometimes it's obvious. If you were to
6 have a text message to say my opponent is, you know, would be a disaster for the
7 country. It's not really a fact checkable statement. That's a political opinion.

8 If there was a specific -- if there was a specific number, you know, an economic
9 stat or something like that, that is usually when we would step in and say you should
10 switch it from this to this.

11 Q And is that -- as far as the fundraising emails and texts, was that
12 determination made by you when research would weigh in to fact check something? I
13 mean that on behalf of the campaign.

14 A I mean, often times I would be the one for communications who would step
15 in and say we should change something. Sometimes I had those -- often times, I should
16 say, I had those emails reviewed by other members of my team who would take a first
17 run at the email or the text before I reviewed it or in some cases I may have just told
18 them that they could -- you know, I didn't have time and that they would review it and
19 that I would use their opinion as the opinion of the research team.

20 Q So for the post-election period, who handled reviewing fundraising emails
21 and texts on your team? Was that you or was that something you would delegate at
22 times?

23 A I don't recall specifically, but I imagine it would have been similar to what
24 occurred during the rest of the campaign, which is some I would've done myself, some I
25 would've had members of my team take a first run at, and some of them I may have said,

1 you know, especially for periods where I was offline after the campaign, that they would
2 have to step in and make that judgment themselves.

3 Q And were there particular people in your team that you would task with this
4 post-election if you were not available?

5 A Normally, for these approvals in terms of the people who were still around
6 after the election, the two individuals who I would normally hand this off to would have
7 been either Dean Cleary or Jacki Kotkiewicz.

8 Q And when did Dean Cleary leave the campaign?

9 A I believe -- I'm not 100 percent sure, but I believe he was either -- I believe
10 he was a December 31st departure. I think that was his last day on the campaign.

11 Q What about Jacki?

12 A I believe it's the same. I believe she was an end of December departure.

13 Q And what about Matt?

14 A He generally did not review -- do those approvals, but I believe he was also
15 an end of December departure.

16 Q I want to go back to who was on the approval chain, and we understand that
17 the approval chain included a variety of campaign officials and RNC officials. And to be
18 clear, I'm speaking about the approval chain that handled the TMAGAC emails. Are you
19 familiar with TMAGAC?

20 A Yes.

21 Q And for the reporters, that's T-M-A-G-A-C.

22 A And TMAGAC is a joint fundraising committee between the Trump campaign and
23 the RNC, correct?

24 A That is my understanding, yes.

25 Q All right. So for the -- for emails that went through TMAGAC, can you tell

1 us about your understanding of who was on the approvals chain? And let's first start
2 with individuals who were not only on the approvals chain but actively involved, putting
3 aside, let's call them, passive actors. Start with the people who actually like yourself
4 who were engaged. Who were those people and what role did they serve?

5 A As best I can recall, normally the email would come from someone on the
6 campaign's digital team and that would have -- they would be the ones presenting
7 possible fundraising emails and texts. There would be -- I don't know if my team
8 members were routinely getting those emails as well or if they were just being directed to
9 me, but we were participants in them.

10 I believe someone from the legal team was normally on those. I don't remember
11 if that was just the campaign legal team or if that may have been someone from the
12 RNC's legal team as well. And I believe -- I'm not sure of this. I believe sometimes or if
13 not all the time, there was another member of the comms team on there, maybe Jason or
14 maybe Tim, but I'm not sure on that front.

15 Q Okay. So we have legal for both the campaign and the RNC. Is that right?

16 A I don't know if the RNC legal folks were always on those. I believe they
17 were generally, but I do not -- I'm not sure on that.

18 Q So who did you understand had to approve an email from the Trump
19 campaign for a TMAGAC email to be sent.

20 A I mean, as best I can recall -- I mean, I really didn't differentiate between,
21 you know, the various fundraising approvals, you know, who might have to sign off on
22 stuff. I know that we would have to sign off -- "we" being the research team. I believe
23 someone from the legal team signed off on those as well each time.

1

2 [1:50 p.m.]

3 BY [REDACTED]:

4 Q And when you say research for the purpose of the campaign, that you would
5 also serve as the comms signup as well, to the extent there was one?

6 A I believe generally yes, as best I recall.

7 Q Did you ever do any work with Gary Coby?

8 A Yes.

9 Q Tell us a bit about how you interfaced with him.

10 A Gary ran the campaign's digital team. And so if there was a digital product
11 that was a fundraising email or text, sometimes might be a video, he would -- the digital
12 team need an approval, he would work with me on that. If it was a different type of
13 product, they might have a request for research. They might say that they're doing text
14 messages about a certain policy area. And they were interested in what specific attacks
15 or pieces of information they should highlight in those fundraising appeals, might send
16 that to them.

17 So it depended on the project, but in general was most frequently probably
18 approvals of digital products or requests for specific information from them.

19 Q And that latter category as to the specific information or attack lines, is he
20 asking you that from a comms perspective, what the comms team thought was effective
21 attack lines, or --

22 A As best I can recall, yes. Although I don't believe I was the only one he
23 would've communicated with about that.

24 Q Who else did you believe he communicated with about that?

25 A I mean, I don't know for sure, but I would've assumed he would've talked to

1 Tim or Jason or possibly even Matt about some of those. So I don't believe I was
2 always -- always involved.

3 Q With regard to him seeking your advice on the substance of fundraising
4 appeals, do you recall that happening post-election?

5 A I mean, I know approvals continued after the election. I don't remember
6 specific approvals. There was, you know, almost I think every day, almost every day we
7 had a long set of approvals to go through, but I don't recall the specifics of post-election
8 ones.

9 Q Do you recall him talking to you about potential attacks regarding stolen
10 election claims?

11 A I don't -- I don't think -- I can't recall a specific conversation with him about
12 that, no.

13 Q Do you know who Austin Bodenheimer is?

14 A I recognize the name. I believe he was -- I can't remember if he was on the
15 digital team or he was with the RNC. I recognize the name.

16 Q So we understand he was the deputy digital director at the RNC and head of
17 the fundraising team that handled fundraising emails and texts. Does that sound
18 correct?

19 A That sounds correct.

20 Q Did you deal with him directly either pre- or post-election?

21 A His name, I believe, was on some of those approval chains. I may have
22 emailed with him at some point. I don't know if I ever met or talked to Austin outside of
23 that, or at least I don't recall conversations with him outside of those approval chains.

24 Q So you don't have any recollection of him coming to you regarding the
25 substance of fundraising appeals separate from the approval chain?

1 A I don't recall any conversation to that effect, no.

2 Q And when Gary Coby would come to you regarding the substance of
3 fundraising appeals, would he do that over the phone, in person, text message?

4 A He would -- he would do it through all of those, you know, depended on the
5 day, you know. Might be something he would want to talk through face-to-face.
6 Might give me a call. It depended.

7 Q Can you think of any examples of when he did that and what the advice you
8 gave him was?

9 A I mean, not a specific example, but, you know, we might suggest an edit to
10 language to be more in line with, you know, again, an economic number or our -- our
11 frequent kind of talking points. He then might suggest, you know, an edit to that edit,
12 kind of an alternative. So, I mean, the conversations would generally be like that. It
13 was often, as best I can recall, kind of a search to find something that, you know, could
14 make everybody happy, so to speak.

15 Q When you say make everybody happy, can you expand on that?

16 A It could -- could be something that we would approve, we would give --

17 Q So is it fair to say that he would come to you with an idea, not necessarily an
18 email, and want to work off your thoughts on it, or was he coming to you with content
19 that he wanted you to look at specific lines?

20 A As best as I can recall, it could be both. There would be times where he
21 might say generally, again, this is for the -- you know, not specific to after the election,
22 but he might ask, hey, what do we have in, you know -- you know, what kind of energy
23 sort of talking points or attacks might you want us to push. We might provide that.
24 The other times where he might come to us and say, hey, we have this graphic or this
25 idea or this messaging frame, is that something that, you know, generally gibus with what

1 you guys are doing? So it could be both of those.

2 Q Okay. I want to move to around election day. And we have information
3 that the digital team had some preapproved copy heading into election day regarding
4 fundraising appeals that would start immediately after election day.

5 Do you recall approving emails or texts that would have been around that
6 November 3rd date that would have been sent the next day?

7 A I don't recall those specifically, although I wouldn't find it odd to preapprove
8 things for an event.

9 Q And do you recall that, prior to election day, that there had been some
10 fundraising emails that spoke on a stolen election, like a fraud type claims in fundraising
11 appeals?

12 A I don't recall that, no.

13 Q We also understand that leading into election day, that specifically the
14 digital team had emails approved only dealing with what was called trying to steal
15 fundraising emails but no other topics. Is that something that -- that sounds correct to
16 you?

17 A I -- I honestly don't know. I don't recall -- you know, the days before the
18 election, we were dealing with a lot of competing tasks and priorities. So I really don't
19 recall the specifics of the fundraising appeals we may have approved before that.

20 Q But as far as to say that it's not surprising to think that those kind of
21 messages would have been approved heading into election day?

22 A I don't know if I would've found it surprising or not. I -- in terms of the
23 content, I don't know if I would have found the content surprising. Preapproving texts
24 or fundraising emails ahead of an event that we knew was going happen was not -- was
25 not out of the ordinary, I'll say that.

1 Q Okay. I want to show you an approval chain from the day after the
2 election, which is November 4th, and that's exhibit 37.

3 So we're going to go down to the bottom of this page, and there's an email here
4 from Julia Trent to approvals@donaldtrump.com and approvals@gop.com. And it
5 copies Kingsley Cortes and Mark Lauder.

6 So we understand that the approvals@donaldtrump.com are the folks from the
7 Trump campaign that would be tasked with approving emails. Does that sound correct
8 to you?

9 A That sounds right to me, yeah.

10 Q And, similarly, the approvals at GOP.com would be the RNC individuals that
11 also have to sign off on fundraising emails and texts for TMAGAC. Is that right?

12 A I would assume so.

13 Q And who is Kingsley Cortes?

14 A Kingsley was Jason Miller's -- I don't know her formal title, but would have
15 been the equivalent of his assistant.

16 Q Okay. And who's Mark Lauder?

17 A Mark Lauder -- I'm trying to remember what his specific title was at this
18 time. I think he was the -- I think his title involved strategic communications. At this
19 point, I think he still worked with surrogates on the campaign, but I don't remember his
20 exact areas of responsibility at the end of the campaign.

21 Q Okay. Was Mr. Cortes someone who had to prove email before they could
22 go out?

23 A I don't remember if she had to approve them.

24 Q Oh, excuse me, she. I apologize.

25 A Yeah. I believe she -- I do not know this for a fact; I had assumed that she

1 was on these so that effectively Jason could get eyes on them or someone was getting
2 eyes on them for Jason. But I don't remember if she had to sign off on them or not.

3 Q Did you have a sense -- because you see at the top of the email you weigh in
4 and say "good," which is you providing your approval, correct?

5 A Yes.

6 Q Did you have a sense who else -- was there a list in your head of other
7 people that you would wait on to weigh in on the email, or can you walk us through the
8 mechanics of who else you thought specifically had to weigh in, or were you not aware of
9 that at that time?

10 A When we reviewed texts and emails, you know, as best I can recall, our
11 approach was we weren't necessarily thinking about who else had to weigh in. We
12 knew that, again, the legal team generally would weigh in. If there was someone else
13 who had to weigh in, you know, they might weigh in as well, but we were going to review
14 them, you know, on our own, and for, again, messaging consistency, those types of
15 things.

16 So, I mean, we were not -- we were not necessarily saying we know these other
17 people are going to weigh in or we have to wait for them to weigh in; we would just, in
18 general, process them as we got them.

19 Q Okay. I wanted to look at the bottom of the second page. And you see
20 there, this looks to be a draft email, and it notes, The Democrats are trying to steal -- in all
21 caps -- the election. We will never let them do it.

22 So tell -- walk us through your thought process, if you -- when you get an email
23 like this -- and over the course of the afternoon, we're going to look at a variety of these.
24 Walk us through your process where a statement like this falls into the research analysis
25 that you conducted.

1 A So with a fundraising email like this, you would, again, review it.
2 First thing is, is it consistent with the message -- the messaging that in general the
3 campaign is putting out. We would look through it and look for inconsistencies there.
4 Is this inconsistent with what as a communications team we have been saying, what the
5 President's been saying, what the White House or campaign surrogates have been saying.

6 So that's the first thing.

7 We would look into, again, broadly, if there was a statement that we would think
8 was, again, generally political rhetoric, you know. That's, you know, not something that
9 we're necessarily tasked to say no to. There's a specific, again, number or a fact, you
10 know, we might chime in and say don't use that, use this.

11 And then when it came to something like election integrity, the campaign's legal
12 efforts, you know, I don't know if I ever had a conversation with Jacki or Dean or Matt, if
13 he was reviewing these, about this, but I generally assumed, when it came to approvals,
14 that the legal team would be the ones to decide if the legal claims we were making were
15 something that they could substantiate.

16 Q And when you say "the legal team," you mean both from the RNC and the
17 Trump campaign. Is that fair?

18 A I specifically was thinking of the campaign. Again, I did not -- when I was
19 doing approvals, I did not think of the RNC because I was employed by the campaign, and
20 that's who my -- that's who I was concerned about.

21 Q But it's fair to say you understood that when the RNC weighed in on these
22 emails, they also had input into revising these emails, that the whole team took those
23 into account?

24 A I don't know if it would be fair to say that. I really don't recall thinking
25 about what the RNC's legal team would be saying. I mean, when I looked at approvals, I

1 looked at approvals as I work for the campaign, I am trying to approve these for the
2 campaign. And that's what I -- that's what I was thinking about.

3 Q And for the campaign legal, is that Alex Cannon, is that fair, for the
4 post-election period, that's who would have been reviewing these emails?

5 A I don't know specifically who would've been on it. I imagine he was. I
6 know he was on at least some approvals, but I -- I don't know if it was always Alex.

7 Q And just to put a fine point in it, you understood that whether it was Alex
8 Cannon or someone else, the legal team would decide if the claims made could be legally
9 substantiated. Is that fair?

10 A I mean, I think it's fair to say that I deferred to the legal team on the
11 legitimacy and the ability to substantiate claims that were made that were put through
12 these approvals and whether or not we could, again, substantiate them or they were in
13 line with our legal efforts.

14 Q I'd like to unpack this a little bit more, because I want to draw a fine line
15 between what the research team is doing and what you think the legal team is doing.
16 Because as I understand it, this kind of sentence here about Democrats trying to steal the
17 election, is that something that you would call political rhetoric?

18 A I would look at that line -- and, again, I don't remember reviewing this
19 specific email or text message. But, in general, we would look at statements like that
20 and we would say, this is consistent with what -- you know, we would ask the question, is
21 this consistent with what the President is saying, is this consistent with what the
22 campaign and campaign surrogates are saying, and is it something where we would want
23 to step in and say you should change it to something else?

24 Something like that I imagine we saw and we said that is consistent with what the
25 President and others are saying. The legal team can weigh in on the -- whether that's

1 consistent with our legal efforts and whether that's something that they can substantiate.

2 Q And I want to focus on that latter half substantiation. Are you suggesting
3 that if the statement were theoretically false and the Democrats were not trying to steal
4 the election, but the statement was consistent with campaign messaging, then it would
5 be incumbent upon the legal team to raise their hand to highlight that the statement
6 would be false, because as you said they could have substantiated? Like, hypothetically,
7 is that whose responsibility you saw it as?

8 A I mean, I can only speak for myself. I, as best I recall, that is who I assumed
9 would be doing that type of review. I don't recall ever being told by campaign
10 leadership, this is your lane, this is your lane. But on things like that, we generally would
11 have deferred to the legal team.

12 Q And if you were told that individuals who were members of the legal team
13 said their role were limited to reviewing just disclaimers on the emails, would that be
14 inconsistent with what you understood?

15 A Can you repeat that question?

16 Q If individuals on the legal team post-election, under Trump campaign's legal
17 team, stated that what they were tasked with was merely reviewing the disclaimer
18 language for the fundraising appeals and not more, would that be inconsistent with your
19 understanding of what they were doing?

20 A I mean, that wouldn't be my understanding, but I think this also can get into,
21 you know, who you're classifying as the campaign's legal team. I -- you know, my
22 recollection of this is we had lawyers who had been with the campaign for a longer time.
23 We had folks like Rudy and Jenna and Sidney who came in towards the end. And so
24 when it came to things like that, I assumed that one of these lawyers would be the ones
25 to decide what was and was not appropriate there.

1 If there is one member of the legal team who said that their sole job was to review
2 disclaimers, again, they may have viewed that as their role. I simply, from my
3 perspective as best I remember, we were not examining that from our end. We were
4 not approving based on that from our end.

5 Q As you'll see, Mr. Parkinson, over the course of the afternoon, we're going to
6 look at a lot of these emails, and you'll see that the Democrats tried to steal the election
7 or the stolen election claims are persistent throughout the post-election fundraising
8 appeals. And, of course, separately, you had your own research that you did. We've
9 talked about the Dominion Voting System, we talked about the dead people, we talked
10 about the hotline.

11 So if there were times when the messaging that might be consistent with the
12 President's statements was inconsistent with the research team's factual research, what
13 impact would that have in your analysis in approving a fundraising email?

14 A I mean, part of this is probably just sort of hypothetical. If there was a
15 specific claim that we had looked into that I -- that we had judged was not something we
16 could substantiate, you know, we may have flagged that.

17 But at the same time, a lot of what we're dealing with were allegations that would
18 pop up, which I did not have access to, you know, the underlying evidence, whether that
19 was affidavits, whether that was some type of person on the ground talking to somebody.

20 And so I can't -- we could not -- we could not -- the way the team is set up, you
21 could not go out and say definitively something did not happen simply because in
22 Arlington, Virginia, we are looking at a computer and not finding backup for it. And so
23 we knew that there were campaign lawsuits, we knew that there were campaign legal
24 efforts to contest the results in some States. And if those were being pursued, we
25 deferred to folks with a legal background on that. I did not view it as our place as

1 communication staffers to tell lawyers what they were and were not alleging in court
2 possibly.

3 Q But here, these emails you're reviewing are not coming from lawyers, they
4 are coming from copywriters that work under Austin Bodenheimer, correct?

5 A I don't know who wrote these specifically. They, in general, yes, the
6 fundraising appeals. The emails and the texts were written by, my understanding, is
7 folks in the digital departments.

8 Q Right. So when you're weighing in here -- because what we've understood
9 is that copywriters draft these emails, and they look to the approvals team to weigh in
10 and as a final arbiter of whether or not these emails should be sent out to the public.

11 So what I'm trying to understand is that, are you saying that you understood the
12 legal team to be responsible for the truth and accuracy of these statements when they
13 came to what you call political rhetoric and not the research team?

14 A I think it would be fair to say we relied on lawyers, whether they were
15 members of the campaign legal team, lawyers who had been there for a longer period of
16 time, or lawyers that were filing these lawsuits, like Rudy and Jenna, to determine
17 what -- what we were alleging, and that we gave broad deference to that and to those
18 lawyers to say what was and was not a fair characterization.

19 Q So let's unpack that. With regard to the latter group, which are lawyers
20 submitting court filings, are you saying that you were reviewing the court filings, or how
21 were you apprised of what they were doing in determining whether or not to approve a
22 fundraising email?

23 A As I recall, I was not reviewing, members of my team, as I recall, were not
24 reviewing underlying lawsuits and legal documents as we were looking at these. We
25 were, at this point again, simply looking for messaging consistency. And I don't recall

1 this for certainty, but I assume I was assuming that, again, lawyers were the ones
2 ultimately deciding if these were claims that we should be making in fundraising appeals.

3 Q And by the lawyers, you mean the lawyers who are on these fundraising
4 approval email chains, not the lawyers filing things in court?

5 A I don't know if I would've necessarily differentiated between them in that
6 perspective.

7 Q We're going to talk about the era of when Rudy and Jenna are around. But
8 at this time period, when you say you don't differentiate, you weren't getting feedback
9 from the lawyers filing things in court.

10 So isn't it fair to say that you have to be relying on the review of the lawyers who
11 are on this chain providing feedback, not other lawyers? Is that fair?

12 A I'm sorry. Can you repeat the first part of that question?

13 Q I said, you were talking about relying on lawyers in making your
14 determination whether to approve these emails. And I'm saying, is it fair to say that
15 those lawyers you're talking about are the lawyers that are on the approval emails chain
16 with you, not lawyers that are litigating on behalf of the campaign elsewhere?

17 A I mean, I would have -- I'll put it this way: I would have expected from just
18 my vantage point that if the campaign lawyers on these emails had an issue with these
19 characterizations and would've thought they were inconsistent with what we were
20 alleging in court, that they would have said something, yes.

21 Q And I appreciate the answer, but what I'm asking is that, whose
22 responsibility is it if those statements are inconsistent with the truth? [Inaudible] for
23 that.

24 Mr. Warrington. Let me jump in here. I mean, what he's just said is he doesn't
25 know. Are you asking him to guess?

1 [REDACTED] Dave, I'm not sure he said he doesn't know. I think he's
2 pointed to two different sets of lawyers that he appears to be relying on.

3 And I want to understand, for determining whether statements made are in fact
4 true or not in these emails that go out and they're going to be -- you know, there are
5 hundreds of emails that go out over 2 months, who was determining whether the
6 statement in there of the terms you've deemed political rhetoric are consistent or
7 inconsistent with the truth, were consistent or inconsistent with your research team's
8 factual research you've done? Whose job is it to analyze it for that?

9 Mr. Warrington. And I think his answer was lawyers. And he said he didn't
10 know whether it was just the lawyers on the email or other lawyers on the campaign.
11 That's what I heard.

12 BY [REDACTED]:

13 Q Well, Mr. Parkinson, if you could clarify. Because these emails never went
14 to -- as far as you know, they never went to the lawyers off this chain, right? You have
15 no knowledge of that?

16 A I mean, this discussion, I think, is reading a lot of awareness and a larger
17 discussion around this approval process that I'm not quite sure took place. We were -- I
18 say we, I mean me and the research team, worked, as I said, to review these for
19 messaging consistency. And if we thought we had information or messaging points,
20 political research that should be substituted in for what was originally composed, we
21 would flag that and possibly push back on it.

22 But we again, I think, broadly assumed that when it came to the legal efforts after
23 the election, that the campaign lawyers, whether that was members of the campaign
24 legal team who had been there for a long time or some of those outside lawyers that
25 were brought in -- Rudy, Jenna, Sidney Powell -- would be weighing in in some other

1 forum to say that this is what we should be saying and this is what we should not be
2 saying. We were not -- I was not going around trying to -- trying to verify every single
3 thing that a lawyer might say because I was not in a position to do that.

4 Q But, again, Mr. Parkinson, I'm not asking you what a lawyer has said. This
5 email is written by copywriters for TMAGAC, and it's sent to individuals at the RNC and at
6 Trump campaign. There is no involvement of lawyers -- Rudy, Jenna -- any outside
7 lawyers are not involved in the process. The email comes up to others, including you,
8 and then you respond, like this example here, "Good."

9 So I'm not understanding the reference to outside lawyers, because -- and I'm
10 happy for you to expand on that, but from our understanding, there is no involvement of
11 outside lawyers. But with regard to the internal lawyers, are those the individuals that
12 you understand to have some responsibility with the truth or falsity of what you call
13 political rhetoric?

14 A I mean, again, I'm not really sure political rhetoric is not something where
15 we're saying, in general, we're talking political rhetoric. It's not something that we
16 generally take to be objectively true or false, but a political argument. You know, again,
17 example of the opposing candidate will be a disaster for the country.

18 You know, I don't build out a bunch of research to then turn around and tell
19 copywriters, here's the proof there'll be a disaster, that is something that is generally
20 consistent with messaging or not, and we would approve it or not based off of that.

21 Q So is the statement "the Democrats are trying to steal the election," is that
22 something that, in your view, could be true or false or something that is purely argument
23 and an opinion?

24 A I mean, I guess it really depends on your definition of the word "steal."
25 And, again, if that is an opinion, we're talking about whether or not it's the opinion of the

1 campaign and whether it's part of the messaging efforts.

2 So I don't remember reviewing this, as I said. If I reviewed it and okayed it, I
3 imagine that I thought it was consistent with the messaging that was being put out at the
4 time.

5 Q But separate from the consistency, what I'm asking you is, is that the
6 statement -- is that the kind of statement that you would have analyzed for truth or
7 falsity or you would have put it in the bucket of it's argument, the same way calling
8 someone a disaster, and it's not something for you to weigh in on as the head of
9 research?

10 A I mean, I don't -- again, I don't remember this email. I do not remember
11 specifically how I would've gone through this. If this is from December 4th as well -- is
12 that the date of this email?

13 Q This is the day after the election. And I can show you -- I mean, we don't
14 want to take the time, but --

15 A [Inaudible] somewhere around 3.5 hours of sleep the night before. So,
16 again, I don't remember this email. I don't remember my thought process around
17 approving this email. I simply do not recall.

18 Q I will say, Mr. Parkinson, we'll show you, but there are a lot of emails that
19 deal with this exact -- almost exact verbatim language. So it's not -- it starts flooding out
20 on the 4th, but it continues consistent messaging that the Democrats are trying to steal
21 the election. You have messaging that Joe Biden is an illegitimate President. It's
22 consistent messaging over what ended up being hundreds of emails and texts.

23 So understanding you may not have had a lot of sleep on this night, this message
24 comes to you consistently over the next 2 months. So, respectfully, I think that, you
25 know, I still do want you to weigh in, is that the kind of statement that you reviewed for

1 truth or falsity or is it just not?

2 These fraud claims, when it comes to Democrats try to steal the election or Joe
3 Biden will be an illegitimate President because he didn't win, was that something you
4 consider political argument or something that you reviewed for truth and accuracy?

5 A I believe that's generally something we would've reviewed for messaging
6 consistency and something as a political argument. Yeah.

7 Q Okay. Let's go to -- this is exhibit 38. And this is also the same day. And
8 Julia Trent again sends an email. And if we go to page 4 of this approval chain, it's
9 asking for approval regarding President Trump, a claim that President Trump had won
10 Pennsylvania.

11 Do you recall getting an email about approving what -- that President Trump had
12 won Pennsylvania?

13 And just to provide some context for you, this chain goes out, Julia Trent sends it
14 November 4th, at 7:47 p.m. And then the next day, on November 5th, the campaign,
15 which we'll show you in a bit, pushes out an email claiming that President Trump had won
16 Pennsylvania.

17 Do you recall an approval chain or discussion regarding an email that the
18 President had won Pennsylvania?

19 A I do not recall this email, no.

20 Q And a claim like this -- so that remained and brought to your attention for
21 research purposes -- is this the kind of thing that would be political argument or would be
22 reviewed for truth or falsity?

23 A Well, in an email like this, I probably would've looked at the statement from
24 Bill, the campaign manager, and said if Bill is saying that, you know, I'm not going to
25 contradict that. He has -- again, somebody was involved in crafting that statement. I

1 don't remember this, but I -- if I had seen something like that, I would have said, okay, the
2 campaign manager said this. That's consistent with our messaging.

3 Q So when you say somebody would have crafted this, are you talking about
4 the copywriters?

5 A No. I mean, there's a quote from Bill in that -- that email. And so I don't
6 know if Bill said that, I don't know if that's a statement that was worked through. But,
7 again, that's something that's coming from Bill. I don't remember this and this approval,
8 but I would, if I were to see something like this, I imagine I would've assumed that's been
9 preapproved.

10 Q And, generally speaking, when you received an email approval chain, how
11 long would it take for you to review one of these chains?

12 A How long as in how long it would take to go through the contents, or how
13 long as in how long to respond back to it?

14 Q How long to go through the contents?

15 A Not specific to after the election, you know, before the election, it could
16 vary. Some were shorter, some were longer. Usually it's -- I think an average time
17 might be 10 to 15 minutes, but that could vary.

18 Q And those 10 to 15 minutes -- actually, I'm going to withdraw that.

19 Let's go to exhibit, what's marked as exhibit 40, which is now -- this is November
20 6th. This email subject line: "For Approval: Election Integrity, Defense and Michigan
21 Fund." And we're going to go -- so we want to show you -- does the name Jenna Kirsch
22 ring a bell to you?

23 A It rings a bell, but I do not remember -- I do not remember who she was.

24 Q All right. We're going to scroll down to page 3. And, Mr. Parkinson, one
25 thing you'll see we're trying to understand is just, when we look at these emails -- and as

1 you well know, political emails often include inflammatory language for the purpose of
2 fundraising. But we're trying to get a sense of, when you are reviewing emails, the kind
3 of things, what goes through your mind as the head of research and the things that do
4 not.

5 So this email here, you -- this is an email that you approved. The bottom of page
6 has you saying, "Good." Mr. Alex Cannon responds, and he says, "Good." Cassie
7 Smedile responds, she says, "OK."

8 Do you know who that is?

9 A Cassie at the time I believe was the deputy communications director or
10 maybe national press secretary at the RNC.

11 Q Okay. And then Jenna Kirsch, it says Legal@gop, she's an RNC lawyer, she
12 says, "Good."

13 So the bottom of page 3, this email has all throughout it, it has claims of voter
14 fraud. You see at the bottom of page 3, it says, "If you count the LEGAL votes, I easily
15 win the Election. If you count the ILLEGAL and LATE votes, the Radical Left can steal this
16 election from us."

17 So, again, this is the kind of -- consistent with the language we've seen before
18 about the stealing the election.

19 Is this again -- fair to say that this is the kind of thing you would not have reviewed
20 for proof of falsity and would have reviewed merely for consistency with campaign
21 messaging?

22 A I think that's probably -- that -- yeah, that's probably fair. With the caveat
23 that I again do not remember this specific email.

24 Q All right. So, Mr. Parkinson, as -- these emails often include the same
25 messaging that persists throughout post-election period. As the broader circumstances

1 of the election were changing, meaning, Joe Biden was declared President-elect, you
2 were not finding any mass fraud and dead people voting, the Dominion System claims
3 had been knocked down, did any of that impact how you analyzed the claims and the
4 emails regarding a stolen election?

5 A I mean, the -- the characterization in the question I would disagree with. I
6 was never tasked with finding mass amounts of dead voters. I was tasked with looking
7 into some specific instances. I also -- you know, when it comes to Dominion and stuff
8 like that, again, our job was to look into these things and to see what we could or could
9 not substantiate.

10 So I, you know -- there are certainly things that we saw out of Dominion that I
11 thought, after looking into them, you know, would not be good to message publicly or
12 push publicly. But, again, for something like this, generally would have been looking at
13 messaging consistency.

14 Q So is it fair to say that you didn't have any research that you'd done on your
15 own to substantiate the claims of election theft that are in these emails?

16 A I think it would be fair to say that I was not thinking that I was the one to be
17 putting together such substantiation.

18 Q And did you understand that to be the lawyers on the email chain that had
19 that responsibility, or did you not know who had that responsibility?

20 A My general understanding and perception at the time was that when it came
21 to legal efforts, we were to sort of, you know, rely on the guidance and the direction that
22 the legal team was going in.

23 Q But did you understand the -- and I hate to belabor the point, but the legal
24 team that's acting separately, they're not on these email chains. So when you're talking
25 about you're relying on them, how are you getting -- how are you informed of what

1 they're doing in order to rely on it in making your determination as to whether it's
2 approved in the email?

3 A The ones you have up right there, I mean, you know, we want justice in
4 Michigan, right. If our campaign legal team -- I believe this is probably around the time
5 where we were -- the campaign was filing lawsuits, you know, we would rely on the legal
6 team -- the broad legal efforts, I should say -- say, well, as the campaign, we're trying to
7 contest these. That's the case, then that, you know, is messaging that matches what we
8 are trying to do as a campaign.

9 Q But when you say we will rely, you didn't draft these emails, correct?

10 A Correct.

11 Q So you don't have firsthand knowledge of what their drafters of the
12 email -- of the emails or texts relied on in drafting them, do you?

13 A Sorry, could you repeat that?

14 Q Sure. You don't have firsthand knowledge as to what the copywriters who
15 draft this email relied on in drafting it, do you?

16 A I don't -- no, I don't believe -- I don't believe so, no.

17 Q And when you would go through these emails and approve them, you didn't
18 go and do separate research into the campaign's legal effort or the like to decide whether
19 or not to approve these emails, right?

20 A To the best of my recollection -- recollection, yes.

21 Q So is it fair to say that when you're reviewing these emails, you're basically
22 looking for consistency with broader campaign messaging and that's really the scope of
23 your work? And to also -- let me add, and to also find what you considered clear, factual
24 discrepancies that may come down to numbers or noting the proper city or something of
25 the sort, but it does not touch upon the core kind of political messaging of these

1 fundraising emails. That would be outside the purview of your research work.

2 A I think broadly that's -- that's probably about right, yes.

3 [REDACTED]. Mr. Parkinson, can I ask you a hypothetical question? I don't know
4 if this is in any of the emails that you're going to see, but we spoke for a bit this morning
5 about your research regarding dead voters in Georgia. If -- and the President and
6 Mr. Giuliani were making claims about dead voters. I think Mr. Giuliani specifically said
7 several times that there were certain number, thousands of dead voters in Georgia. So
8 that would be some messaging that was out there.

9 If you saw a campaign email that said 10,315 votes were cast in Georgia on behalf
10 of dead people, would that be something that you would approve because it's consistent
11 with messaging or would you bring to bear some of the information that you had
12 discovered that might call into question that claim?

13 The Witness. I mean, hypothetically --

14 Mr. Warrington. You're asking him to speculate what he would have done.

15 [REDACTED]. Yes. Because I think it might help answer some of the questions
16 that we're trying to get at in terms of how he perceived his role.

17 The Witness. Let me put it this way --

18 Mr. Warrington. [Inaudible] I don't know how many times he's got to say it. He
19 was reviewing for message consistency, and that's fairly limited. And then asking about
20 a hypothetical, I don't see what the value of that is. I mean, it's just -- I just, frankly, just
21 don't see the connection to the hypothetical it raises to any of the facts that supposedly
22 went on during this period of time.

23 If you've got a document such as that, show it to him and ask him about it.

24 [REDACTED]. Okay. I understand your point, Mr. Warrington.

25 BY [REDACTED]:

1 Q Mr. Parkinson, are you able to answer that question?

2 A I mean, yeah, I don't -- I don't know if I could do a hypothetical. I'm not in
3 the mind-set of post-election. If there was a claim in an email that I thought had
4 previously been pushed by, you know, a member of the legal team, I probably would have
5 said, you know, that's -- that's consistent.

6 [REDACTED] Okay.

7 BY [REDACTED]:

8 Q Okay. So November 3rd is election day, November 7th President Biden is
9 declared the nomin- -- is declared the winner publicly.

10 And so let's go to -- and I say that just to frame our timing so we can get a sense of
11 what's happened in the broader election.

12 Let's go to exhibit No. 43.

13 And this is an email from November 10th. Subject line is, "For Approval:
14 Pennsylvania & Election Poll." And you'll see at the top, Mr. Cannon says, "Good with
15 edits below incorporated." Ms. Cortes says, "Good." You offer some comments that
16 say, "Awkward phrasing here."

17 And you may be able to see it, but you'll see it with the what I think are track
18 changes in the original, that's what that highlighting is. And then below, Justin Riemer,
19 who was then chief counsel of the RNC, he says, "Suggested edits below to RNC
20 communication?"

21 And if you go to -- we go to page 3 of this email, you can see Mr. Riemer's edits.
22 And here, he -- it looks like the original email said, "Joe Biden should not wrongfully claim
23 the office of the President." And then the new email says, "Joe Biden does not get to
24 decide when this election ends. Only LEGAL ballots must be counted and verified."

25 Do you see that?

1 A I do.

2 Q Okay. And we're going to look at several examples of this where it appears
3 that the -- that there were edits made to these emails to try to remove suggestions that
4 President Biden did not win the election and that President Trump did.

5 Do you recall any -- did you have any discussions with anyone from the RNC about
6 softening or changing the tone of the emails in the approvals process?

7 A Not that I recall, no.

8 Q Did you have any discussions with anyone at the campaign about softening
9 or changing the messaging in the fundraising emails?

10 A Not that I recall, no.

11 Q So an edit like this, is it fair to say that this edit pulls back the initial or
12 softens the initial assertion and revives it to have something that says -- something that's
13 completely different than what it originally stated? Is that a fair characterization?

14 A I mean, I can't see everything that's been edited out, but --

15 Q Well, here, just so the record's clear, what it edits out is Joe Biden, it
16 removes "should not wrongfully claim the Office of the President." And then it then
17 says, Instead, "Joe Biden does not get to decide when this election ends. Only LEGAL
18 ballots must be counted and verified."

19 And then you later say, "Good with Justin's edits," which indicates that you
20 reviewed these edits.

21 A So what I can say about that is normally -- and I don't know how many
22 fundraising emails you may have, you may see this with other folks as well.

23 Sometimes -- I don't know what I was specifically doing with this email or, you know,
24 what I did or did not review because I don't remember it, but often we would say good
25 with so-and-so's edits just to signify to the digital team or whoever else that our edits

1 were in addition to others, basically an attempt to say, you know, what we're editing is on
2 top of that.

3 Q But you would've reviewed those edits before you said that, correct?

4 A I don't recall this specific email. I don't know if I did. I may have, but I
5 honestly don't recall.

6 Q Well, I'm not asking if you recall the email, but is it fair to say that when you
7 note in this and other emails that you're good with someone's edits, that we can sort of
8 infer that you reviewed those edits before you said that? Because you wouldn't reply to
9 everyone saying you're good with someone's edits and not scroll down and see what they
10 were, right?

11 A Not necessar- -- I mean, again, I -- you know, without talking about specific
12 email, not necessarily. I might simply say, these are the edits we saw. And, again,
13 these are on top of someone else's edits.

14 Basically, you know, if we -- you know, don't miss the other edits that someone
15 else flagged. I mean, it -- your point in general would I have reviewed them, likely, but I
16 do not know for sure, and I don't think that always was the case that I would have
17 necessarily agreed and concurred in those edits.

18 Q So if you didn't agree with the edits, what would you do?

19 A If I did see edits that I didn't agree with, you know, might have a discussion.
20 I don't recall how frequently that might have been, but might have email traffic over that.
21 I think for these, you know, again, other than Gary generally -- Gary might call me or
22 might just come upstairs. In general, I think those discussions were handled mostly over
23 email, as best I recall.

24 Q So we have a variety of emails, as I'll show you, that have a lot of edits where
25 you again and again say that you're good with them. Are you suggesting something

1 different than that's you approving and saying they're fine with you or are you suggesting
2 that could be something else?

3 A If -- again, I don't recall a lot of the specific fundraising emails. As I'm sure
4 you all have seen in going through these documents, there's a lot of them and they're
5 every day. So trying to recall a specific approval and what the back and forth might have
6 been would be difficult for me to remember.

7 In general, if a lawyer might have some edits, you know, that's something that in
8 general I would not, you know -- as I remember, I would not try to supersede those,
9 because, again, the lawyers are the ones we generally trusted to make sure we were, you
10 know -- we were being -- we're kind of operating within safe boundaries, so to speak.

11 Q And when you say "safe boundaries," that's some of the truth and falsity you
12 were talking about earlier, right, when you said you relied on the lawyers to catch some
13 of that. Is that fair?

14 A I mean, also when it comes to, you know, legal requirements that we have
15 with fundraising appeals, right. So making sure that there's disclaimers, things like that,
16 you know. So just in general, there was, I think -- we generally, from my end, would
17 defer to the lawyers on their edits.

18 Q But I want to hone in on the lawyers and their edits for truth and falsity,
19 because I think you testified earlier, correct me if I'm wrong, but you were primarily
20 focused on messaging consistency, and you didn't see within your purview to check for
21 political rhetoric for truth or falsity.

22 So a situation like here where Justin Riemer says, remove that Joe Biden should
23 not wrongfully claim the Office of President, which is several days after he's now
24 President-elect, it seems to me that that's an edit for truth or falsity, but tell me if you
25 read that differently?

1 A That may be. I mean, in something like this, right, where we are talking
2 about this is all related to campaign legal efforts, you know, again, would generally defer
3 to lawyers on the specifics there.

4 If a lawyer, again hypothetical, if a lawyer, you know, were to make an edit on
5 messaging, you know, just try to be helpful, just general, you know, type of talking point
6 type edit, then we might push back on that.

7 But, in general, when it came to things like our legal efforts and legal challenges,
8 we would defer to the legal team on those edits.

9 Q And is it fair to say you'd also defer to them when they made edits based on
10 the truth or falsity or accuracy of the statement, that you'd also defer to the lawyers then
11 as well?

12 A In general, if a member of the legal team thought that something should be
13 removed, unless I thought that that was inconsistent with our messaging, you know, in
14 general, we'd concur with that, because the goal of these approval processes is to get to
15 some type of language that is, you know, can get out the door. And so if they're saying
16 some stuff has to get cut, unless I had a good reason to push back, I would generally defer
17 to them.

1

2 [2:49 p.m.]

3 BY [REDACTED]:

4 Q Okay. So let's go to exhibit -- let's look at exhibit 44, which is an email that
5 comes -- it's an approval email that goes out on November 10th, and you approve it. It
6 goes out at 6:25, and you approve it at 7:05. You'll see at the bottom of page 1, it has
7 you saying that you're good with edits.

8 Do you see that there at the bottom?

9 A Yes.

10 Q And earlier on Justin Riemer again, he adds in some edits. You can see on
11 the second page that Justin Riemer is the lawyer that puts in the edits.

12 And we can to page 5 of this to show you an email, and here -- sorry.

13 Up, please.

14 Justin Riemer's edit, the original text says: "President Trump won this election
15 by a lot. He got 71 million legal votes." And then he revises that to say President
16 Trump -- and he removes the language that he won this election by a lot. So he then
17 says just "President Trump got 71 million legal votes" and removes the claim of that he
18 won.

19 Do you see that?

20 A Yes.

21 Q Do you recall this email?

22 A No, I do not recall this email.

23 Q Now, looking at an email like this where Justin Riemer removes a claim of
24 President Trump winning the election -- this is by November 10th. What's your
25 understanding as to what you thought he was doing here?

1 A I do not recall an email, and I don't -- I don't think I had met Justin before
2 this, so I don't know if I would have been trying to interpret his intentions.

3 Q Well, you said you were good with his edits. So it's fair to assume that you
4 understood the edits because you didn't push back on it, but you said you would if it was
5 inconsistent with campaign messaging.

6 A The edit that he makes here -- again, I don't remember this email, so I do not
7 know for sure what I was thinking at the time. But the email, if you make that edit, it is
8 still broadly consistent with our messaging. And so at that point, again, the goal is to get
9 things approved, not to spend hours doing back and forth nitpicking language. And so
10 that is consistent with our messaging. I imagine I would have thought that's fine, that's
11 consistent with our messaging.

12 Q But on November 10th, President Trump was claiming that he had won the
13 election. Correct?

14 A I don't remember the specific dates, but that sounds right.

15 Q All right. So the initial text written by the copywriters was consistent with
16 campaign messaging at that time that President Trump both got 71 million votes and that
17 he had won the election. Correct?

18 A I think that's broadly consistent, yes.

19 Q So when Justin Riemer makes the edit that legal says you can't
20 claim -- where he says legal says you can't claim President Trump won the election, is it
21 fair to say that that's the kind of truth and falsity work that you expected them to be
22 doing to know where the boundaries were of what could be said and couldn't be said?

23 A I mean, Justin didn't work for the campaign. He worked for the RNC.
24 With something like that, again, if someone -- in general, with these approvals, if
25 someone just wanted to cut something and there wasn't a good reason to fight it to

1 include it, in other words, it needed to be included, you know, probably wouldn't push
2 back. Again, the goal was to get to an approval.

3 So in this case, even with that cut, the language is still consistent with the
4 campaign's messaging, and so at that point it's fine, that edit.

5 Q So is it fair to say that that's a substantive change that he made?

6 A You could characterize it as that, I guess, yeah.

7 Q Going to exhibit 45, which is another approval chain that you, again, say that
8 you're good with the edits, it's on November 11th. And this time the edits come from
9 Jenna Kirsch, which at the bottom of page 2 Ms. Kirsch says: "Edits below." You recall
10 she is legal for the RNC.

11 And Ms. Kirsch on page 3 at the bottom, she removes the language -- the initial
12 sentence says: "If patriots chip in a certain amount of money, we will have what it takes
13 to keep fighting and secure 4 more years." And then the new language says, "If
14 someone chips in money, we'll have what it takes to keep fighting and defend the
15 election."

16 So it removes the representation about 4 more years, and you'll see it adds in at
17 the bottom there: "Stop the left from stealing the election" to "trying to steal the
18 election."

19 And on page 4, she makes similar edits where it talks about -- it's from the
20 President saying that he needs resources to defend the election. It says: I need, you
21 know, the person to step up and contribute to our critical Election Defense Fund so we
22 can defend the election.

23 And the initial --

24 Sorry, [REDACTED]. Could you go to the next -- are you on the bottom of page 4?

25 Yeah, there you go.

1 It says -- the initial sentences says: "I need you to step up and contribute to our
2 Election Defense Fund so that we can defend the election and secure 4 more years."
3 And then legal changes that to "I need you to step up and contribute to the Election
4 Defense Fund so that we can defend the election and finish the fight."

5 So she switches out "secure 4 more years" to "finish the fight" at that time as the
6 basis to contribute to the Election Defense Fund.

7 And for the sake of time, I will just proffer to you that there are numerous
8 examples where legal removes references to securing 4 more years and makes it to
9 defend the election. And Ms. Kirsch does that again and again, and individuals from the
10 Trump campaign, including you, indicate that you are good with those edits on repeated
11 occasions.

12 Do you recall these repeated edits that came in softening the language from
13 claims of contributing to the campaign would secure 4 more years versus finish the fight?

14 A No, I don't recall those.

15 Q Is it fair to say that that is consistent with -- these edits I've shown you here
16 are consistent with Mr. Riemer's edits that soften the language from representing that
17 the President would win this re-election versus the money doing -- not securing a second
18 term for him? Is it fair to say that these messages have the same kind of softening of
19 language?

20 A I mean, I don't have access to these emails anymore. I have not reviewed
21 any of these in a year and a half, whenever that was, and I didn't know Justin or Jenna
22 personally. I don't think I've ever met Jenna. And so I don't know what their intent
23 was. I, again, would imagine that as I reviewed it, I saw their edits, said that is still
24 broadly in line with our messaging and that's fine.

25 Q So you're saying if RNC legal came in and essentially wanted the emails to

1 not reflect that the campaign was going to win a second term and soften language, you
2 wouldn't have taken a position either way? You would have just said if that's what they
3 want, that's fine?

4 A As long as it was broadly consistent with the campaign's messaging. Again,
5 the goal was to, you know, get these approved and find something. If legal had
6 concerns, unless I had a strong reason to push back against that, I mean, that's -- then
7 obviously I would imagine that's why I approved it.

8 Q When you say "broadly consistent," the campaign was claiming that
9 President Trump could win a second term. Correct?

10 A I think at the time, yes, the campaign's legal team was still arguing that, yes.

11 Q So the most consistent messaging would have been the original text
12 indicating that you could secure a second term or 4 more years or that he had won as the
13 President was claiming, that would have been the most consistent messaging. Is that
14 correct?

15 A I mean, again, part of this is we do these -- we did these every day, and if you
16 went to war over every little word, the text messages and the emails would never go out.
17 And so, you know --

18 Q Well, Mr. Parkinson, if that's every little word, the edits in these emails are
19 not heavy, and I can show you repeated examples we have ready where folks are not
20 going in with the hard pen. Ms. Kirsch's text revisions are often removing a reference to
21 4 more years.

22 So it's not -- it doesn't -- I take your point, but the edits that we're seeing are not
23 heavy-handed. It's repeated, like you saw, of removing a claim that President Trump
24 had won the election. That was a small edit. I would argue substantively that it
25 wasn't -- these numbers are not a high number of edits.

1 So when you were viewing these emails and consistently saying that you were
2 good with the edits that were softening the language, is it fair to say that you were
3 approving language that was less consistent with the campaign's messaging than what
4 came up in the copywriter's?

5 A I mean, I don't know if I would characterize it that way. Again, just because
6 a fundraising text or email does not contain all of the talking points or, you know, every
7 type of argument we've made, I don't think makes it inconsistent with the larger
8 messaging.

9 And, again, if getting the -- you know, getting an approval was to accept these
10 edits and the edits -- again, I don't remember reviewing these. If the edits were broadly
11 still in line with the messaging, then in general we would say yes.

12 Q Did you have any discussions with anyone as to why the lawyers were
13 repeatedly removing language that suggested a second term was coming or that
14 President Trump had won the election?

15 A Not that I recall.

16 Q Was it noteworthy to you that they were removing language claiming that
17 he would win a second term or that he had won the election?

18 A I don't know if I ever thought about it. I truly don't remember.

19 Q I'm going to jump forward a bit. This is now -- let's go to exhibit 50.
20 And you mentioned numerous times that these were RNC folks versus the
21 campaign folks. Was it noteworthy to you that these were RNC lawyers revising
22 President Trump's proposed words? Did that affect your analysis here at all?

23 A I don't -- I don't know if I would characterize them as President Trump's
24 words. I mean, in some cases, I'm sure the copy editors are trying to mimic those.

25 I mean, did I think about the RNC versus the campaign lawyers when approving

1 these, I probably didn't -- I probably didn't consider that, but I don't really remember -- let
2 me put it this way. I don't really remember thinking about the difference, other than at
3 some point if something had come up, obviously, I would have factored in our own
4 lawyers, since I was an employee of the campaign, probably would have given greater
5 deference to them versus lawyers at the RNC.

6 Q So in the middle of this email -- this is now November 19th this goes out.
7 And if we go to page 2, Ms. Kirsch again has edits. You at the top of the page say you're
8 good with the edits, and at the bottom of page 2, she removes the claim that "The radical
9 left allowed illegal ballots to spoil our election," and it instead says, "The radical left does
10 not want us to investigate."

11 I assume, again, you don't recall this? Right?

12 A Yeah. I mean, I think as I've said, I don't recall any specific fundraising
13 appeal approval from after the election.

14 Q And then on page 4 of this email, Ms. Kirsch changes a subject line from
15 "overwhelming evidence of voter fraud" to "voting irregularities."

16 Reading that edit, what do you make of that edit, a change from "voter fraud" to
17 "voting irregularities"? How do you read those differently?

18 A I don't know what I made of it at the time. I don't.

19 Q I'm asking what do you make of it now. Is it fair to say that voting
20 irregularities is a softening of the language from a claim of voter fraud?

21 A I am not a lawyer. I do not know Jenna. I would not be able to define her
22 intentions.

23 Q That's not what I'm asking you. This email goes out to everyday Americans
24 who are expected to understand what the email says. So I'm asking you what do you
25 think someone reading this email would read -- would they read voter fraud versus voting

1 irregularities, would they read the latter one as a softer claim of claiming voter fraud?

2 Mr. Warrington. You're asking him to -- let me get this straight. You're asking
3 him to get into the mind of somebody who receives an email and then make a
4 determination on the language, half of which they haven't seen because it's been
5 changed, whether they would determine at that point it was softer language than the
6 language that was edited out that they hadn't seen?

7 ██████████. Well, to be clear, I'm asking the deputy communications
8 director of the Trump campaign who was tapped with reviewing messaging that is
9 consistent with campaign and for years had taken on the professional responsibilities to
10 craft messaging for everyday Americans to understand and interpret.

11 So based on his background and experience, I want to get his read on the
12 difference in language here.

13 Mr. Warrington. But you're asking him to give that perspective from a recipient's
14 viewpoint, not his own viewpoint.

15 ██████████. Yeah.

16 Mr. Warrington. I mean, you're basically trying to turn him into an expert
17 witness.

18 ██████████. No, I'm not. I'm asking him to use his extensive
19 background and experience in this area to help me understand, through his background,
20 through that lens, how he would read the difference in the messaging here.

21 Mr. Warrington. Okay. That's fair, how he would read the language, not what
22 somebody out there -- I mean, that was the problem with the initial question. You were
23 asking him to opine on what a recipient would make of the difference between the two
24 words.

25 So if you want to ask what his opinion is, that's fair.

1 [REDACTED]. That's fine with me.

2 BY [REDACTED]:

3 Q Mr. Parkinson, let me have your opinion.

4 A I mean, again, I don't know what Jenna was necessarily trying to do. Voter
5 fraud versus voting irregularities, maybe she thinks voting irregularities is a more specific
6 term of what we're alleging, what we were alleging. How does that read to the average
7 person? I don't necessarily know. There are -- as you can see from this fundraising
8 appeal, there are multiple different subject lines, multiple different preview texts.
9 Further down there's a preview text that says: "Evidence of fraud."

10 I mean, I -- again, reviewing these was not a crafting of a perfect document. It
11 was an attempt to go through what had been written and to see if it was broadly
12 consistent with our campaign messaging. To me voting irregularities, again, broadly
13 consistent with that. If a lawyer wanted to change voter fraud to voting
14 irregularities -- again, I don't remember looking at this specifically, but to me that still
15 reads as broadly consistent.

16 Q Let's go down a bit in this email, please.

17 That's good. Thank you.

18 So look at that next edit she does. She says: "Rudy Giuliani and the Trump
19 campaign legal team have reportedly uncovered mass amounts of voter fraud." And she
20 changes that and says: "Voting irregularities."

21 Would you have viewed the original statement there as consistent with what you
22 understood by November 20th, that Rudy Giuliani had uncovered mass amounts of voter
23 fraud?

24 A Would I agree that the original -- the statement as originally written was
25 consistent with the campaign's messaging?

1 Q Was it consistent with truth?

2 A I never had -- I don't think I ever had a discussion with Rudy Giuliani, so I
3 don't know what he uncovered.

4 Q Now, with the timing of this, when you approved this email, this would have
5 been after Rudy Giuliani's November 19th press conference, which I think you testified
6 earlier that you recall. So that may help frame the timing of when you were reviewing
7 Ms. Kirsch's edits to this.

8 So you see the press conference, which you indicate you recall, and then you say
9 you're good with the edits, and she removes out that Giuliani had uncovered mass
10 amounts of voter fraud and says voting irregularities.

11 Does that help you kind of frame this a little bit more?

12 A If you're asking me if I thought Rudy or Jenna Ellis or Sidney Powell were
13 being helpful in their messaging efforts, I think I've already said, no, I did not think that.
14 I think you have the text messages that show that I did not think they were helpful.

15 But if you were to ask me to weigh in on what Rudy Giuliani reportedly uncovered
16 and specific evidence, I don't think I ever had access to the things he produced. So,
17 again, I can only -- you know, my opinion I think I have made clear. I think you have
18 communications that have my opinion in them. But for me to say, you know, what is
19 this, we have the word reportedly in there, that is what he was alleging at the time.

20 Q Well, let's look at the next edit there. And Ms. Kirsch removes the claim
21 that Joe Biden did not win this election. She takes that out there.

22 Do you see that?

23 A I do.

24 Q Okay. So then you have -- this is now November 19th. You have further
25 revisions to the email from legal, stopping the email just short of saying that President

1 Biden didn't win the election. And what I want to get your insight on is -- well, is it fair
2 to say that that's what's happening here, that the edits reflect a concerted effort -- or
3 appear to reflect a concerted effort to stop short of claiming that Joe Biden did not win
4 the election?

5 A I don't -- again, I don't know Jenna. I don't think I had ever talked to her in
6 person. I don't know her thinking behind this.

7 Q Well, I'm not asking for her thinking. You reviewed -- your response
8 indicates that you reviewed these edits and said you were good with them. So I think
9 it's fair to presume that you drew some kind of -- you reached some kind of conclusion
10 that you were fine with these edits, which is the copywriters said something that was
11 consistent with President Trump's messaging, which is that Joe Biden did not win the
12 election, and legal says remove that. Don't say voter fraud; say voting irregularities.
13 Joe Biden -- the copywriters say Joe Biden did not win. Legal says remove that.

14 If we scroll down to the next page in this document, the original text says that Joe
15 Biden -- it says "he did not win this election," and legal changes that to "he hasn't won
16 this election."

17 So, again and again, the messaging seems consistent from legal that the campaign
18 here should not be saying that Joe Biden didn't win the election.

19 Is that fair from your read as well?

20 A I mean, again, I haven't seen these emails in a very long time. For me to
21 say that I was reviewing these to the level -- again, we had usually at least one round of
22 these every day -- and that I was remembering every individual edit to notice a pattern
23 over time of the same edits they were making, you know, I don't recall doing that.

24 As I have said, I do not know the reasoning behind these edits. If I approved
25 these, then in my judgment at the time I thought they were broadly consistent with the

1 messaging that was coming out from the campaign then.

2 Q So is it fair to say that you deferred to people like Ms. Kirsch here to make
3 sure these emails were correct?

4 A Again, Jenna, if I remember correctly, was an RNC employee, not a campaign
5 employee. But folks that I would have deferred to to potentially raise issues from our
6 end, from the legal perspective, would have been the campaign's legal people.

7 Q So in this email where Alex Cannon also says that he's good with the edits
8 and adopts Ms. Kirsch's edits, is it fair to say that puts the reliance on him that you were
9 fine with his edits?

10 A Yes. Again, if I approved them, then I looked at the modified language, the
11 edited language, and I must have made a judgment that it was, again, broadly consistent
12 with the campaign's messaging.

13 Q And I know I'm belaboring the point, but I will do it nonetheless.

14 You come back to it's consistent with campaign messaging. And I want to
15 understand your thinking because it appears -- and tell me if you disagree -- Ms. Kirsch is
16 consistently making edits so that these emails do not explicitly say that Joe Biden did not
17 win the election or that President Trump won the election.

18 Is that fair that's what the edits are doing?

19 A I don't know -- again, I don't know. I don't believe I've ever met Jenna. I
20 don't know why specifically she made those edits. What you're suggesting, someone
21 could read it that way. I certainly understand that.

22 I have had discussions with -- I had discussions with legal folks on the campaign
23 I'm sure at some point where they may have had concerns that were not purely factual.
24 They may have just thought that some language was, for whatever reason, better than
25 another.

1 Again, I broadly deferred to the lawyer's judgments as part of the efforts to get
2 these out and then make sure they were consistent with the campaign's messaging.

3 Q But is it fair to say that her edits do not track the campaign's messaging?
4 That is not what the campaign is claiming, correct, at this time?

5 A Again, I still -- I don't remember reviewing this in particular, but if -- you
6 know, saying he hasn't won this election I think would still be consistent with the
7 campaign's messaging.

8 Q And it's saying that he did not win the election. That would be consistent
9 with the campaign's messaging too. Correct?

10 A I'm sorry. Repeat that.

11 Q The prior language, that he -- saying that Joe Biden did not win the election,
12 that would be consistent to track campaign messaging. Correct?

13 A I think at that time, to the best of my recollection, that would have been
14 consistent, yes.

15 Q And the same way that saying in the prior one that Joe Biden did not win this
16 election, that would have tracked campaign messaging as well. Correct?

17 A From my perspective, as best as I can remember, that would have been
18 consistent with the messaging.

19 Q Because President Trump during November and also December, I think, until
20 the present day says that he won the election and Joe Biden did not. Right?

21 A I believe he is still saying that, yes.

22 Q So when legal comes in and repeatedly removes claims that Joe Biden did
23 not win the election or removes claims that President Trump won the election, that does
24 not track with campaign messaging, does it?

25 A Again, I do not remember these, but I think the level of specificity that you

1 are talking about, changing phrasing and words, was not something where I would have
2 thought it amounted to a truly substantive difference from what we were saying.

3 And so, again, if I approved these messages at the time, then I was of the opinion
4 at the time that they were broadly consistent with the campaign's messaging.

5 Q So if RNC legal thought that the President didn't win, but they were
6 nonetheless consistent with the new change, that's fine?

7 A Again, I did not have a phone call with Jenna. I did not -- that I can recall, I
8 did not have discussions with RNC legal folks about these things. As best as I can recall,
9 in these situations, if they wanted to make small tweaks and I still thought they were
10 broadly in line, I would have said okay to that.

11 Q So you think it's a small tweak to remove that the President won the
12 election?

13 A I think if we were to start --

14 Q Just to clarify for the record, you think it's a small tweak to remove a claim
15 that President Trump won the election?

16 A I think if you want to phrase it differently -- again, I'm not a lawyer. I do
17 not suppose to think how a lawyer thinks. If a lawyer wants to tell us that they think
18 that it is better to phrase something a different way and I still thought it was broadly
19 consistent -- again, voting irregularities, you know, it probably doesn't sound as sexy as
20 voter fraud, but that's fill essentially the same thing from a messaging perspective.

21 Again --

22 Q In that second example, though, removing that Joe Biden did not win the
23 election, you think that's still the same sentence?

24 A I think did not win versus has not won --

25 Q No. Sorry, Mr. Parkinson. I'm referring to what's on the screen now.

1 Ms. Kirsch removes a reference -- she doesn't add new language. She just takes out the
2 "Joe Biden did not win the election." She just takes that out fully.

3 Do you think that's a small tweak?

4 A I mean, broadly, yes. Most of the rest of the email is still there. Again, if a
5 lawyer wanted to change some phrasing, take out a phrase, and the message itself was
6 still broadly consistent, you know -- again, I don't remember this specific one, but I
7 imagine that would not have been a big concern for me.

8 Q I'm going to show you very briefly what's exhibit 52, which are text messages
9 you produced with Gary Coby.

10 Now, it appears as if you and Mr. Coby are on several of these messages. Can
11 you kind of walk us through why he's texting you directly and how this approval process
12 worked?

13 A So, in general, if I remember this correctly, Gary -- you know, we would be
14 sent these approvals, and sometimes I would not get to them quickly. Gary would text
15 me if I didn't get to them quickly or if we had received an approval request and it needed
16 to happen quickly.

17 So I believe these text messages are mostly just him basically flagging for me that
18 he would like them to be reviewed as soon as possible.

19 Q Okay. Thank you, sir.

20 [REDACTED]. Give us one second, please.

21 Mr. Warrington. Sure.

22 BY [REDACTED]:

23 Q All right. Mr. Parkinson, are you familiar with the Trump app that was
24 around during the campaign?

25 A I know of it, yes.

1 Q Did you have any involvement in approving messaging that went out on that
2 app?

3 A I may have, but I'm not sure.

4 Q Any recollection of post-election messages going out on that app?

5 A If it would have, it may have been included in those digital approvals that I
6 may not just remember it being differentiated out. In terms of were there different
7 approvals for content that was going just on the app, that I don't remember.

8 Q Do you remember who was involved with the app who would have been the
9 person that came to you for approvals to get messages out?

10 A I don't -- I would imagine it would have been Gary, but I don't know.

11 Q Okay. All right. Do you recall in and around December 7, 2020, where
12 Jason Miller came to you about some TV ads and getting help on getting some election
13 fraud ads on the air?

14 A It rings a bell, but I don't -- I'm not recalling it specifically, but it rings a bell.

15 Q Okay. I'm going to show you what is exhibit 56.

16 And it's a text on December 7th from -- it's you, Jason, and Matt. And Mr. Miller
17 says: "Urgent request. Need best video clips of election fraud that could be put in a
18 TV:30 commercial: The suitcases of ballots, et cetera. Doesn't necessarily have to be
19 proven, but does need to be easy to understand. Ideally we don't use
20 Fox/OAN/Newsmax talent making claims. Thank you."

21 And Matt Wolking says: "Perhaps our legal team has a list of video evidence.
22 The suitcases one is the only one I'm aware of that has not been explained. I will say all
23 the videos I've seen are not good quality; i.e., security footage where the actions have to
24 be explained."

25 Do you recall this exchange or generally the subject matter, discussing it with

1 Jason Miller or Matt Wolking?

2 A I don't recall this exchange. I do remember at some points there was a
3 discussion -- I don't remember who with exactly -- about getting more clips of reporting
4 about voting irregularities, possible voter fraud. And I remember us having trouble
5 finding good news reports that we thought we could use. This may be that, but I don't
6 remember this specific conversation.

7 Q Okay. We got another text from you with an individual named John Choi.
8 Who is that?

9 A He is a friend from college.

10 Q Okay. So what I'm not sure, I think in the emails -- did he work with the
11 campaign or was just a friend?

12 A Just a friend.

13 Q Okay. Because I'll just show you what's page 2 of what you produced, and
14 this is exhibit 57, page 2 of that. I think the email from Mr. Miller -- the text from Mr.
15 Miller was 12:45, and at 12:51 you text: "You need any help on those election fraud
16 clips?"

17 But maybe you can let us know later who you were texting, but do you have a
18 recollection of who this would have been to? The prior page is with John Choi, but it
19 sounds like it would not be him.

20 A Let me check. That would not have been John. I believe that would have
21 been Matt. Yes, that text message was to Matt.

22 Q Okay. Do you recall doing work on a TV ad with Larry Weitzner of
23 Jamestown Associates?

24 A He -- I worked, I believe, with Larry on a number of TV ads, yes.

25 Q Okay. So pre-election, what kind of work did you do with him on TV ads?

1 A Larry and Jamestown were one of our TV ad vendors. They would put
2 together either a script, sometimes before producing a video. Sometimes they would
3 produce a video and then I would see the video. And I would, again, have to give
4 research approval for those TV ads.

5 Q And when you say "research approval," would that mean checking whether
6 the claims made could be substantiated?

7 A In some cases, yes. So one of the things with TV ads was that in order to air
8 them on certain networks, some networks would require us to produce basically a
9 document showing and substantiating the claims that were made in the ads.

10 And so depending on the ad and what was said, I might have to work with Larry
11 and the Jamestown folks to produce that document, might have to tell them that I didn't
12 think we could substantiate something and it might be difficult to do so. In some cases
13 we would get requests to substantiate, again, things that I thought were purely rhetorical
14 and were not objective facts or things that could be substantiated. But in general the
15 process was to work with them to get ads that they could get placed on TV.

16 Q Okay. And so I'm going to jump back to the post-election period. I'm
17 going to show you exhibit 58, which is an email chain that begins with Larry Weitzner, and
18 we're going to start on page 10 of that email, which is a December 8th email from Larry
19 Weitzner. This is the day after the text that we just saw with Mr. Miller.

20 And if you would scroll down, please.

21 You'll see here he says: "Team, I was asked by Jared and DJT to work on an ad
22 about election fraud. Attached is a 60-second script doing that. It will be followed by
23 a 30 focusing the Georgia example and another on multistate fraud.

24 "I know we have significant issues get the ads on the air. We took out a lot of
25 the language that I think Fox would object to, but I would assume we would get pushback

1 anyway."

2 When he says, "I know we have significant issues getting the ads on air," is that
3 the substantiation that you're talking about that some networks might require to put an
4 ad on the air?

5 A That may be. I don't remember this specific email. But, yeah -- I mean,
6 broadly what this is talking about, the idea that the networks might object to specific
7 language, that is something that I had witnessed, yes, with other ads.

8 Q And are these pre-election ads?

9 A Yes. With pre-election ads, yes.

10 Q And is it fair to say that those are situations where Jamestown had created
11 an ad and the campaign couldn't provide sufficient substantiation to the networks for it
12 to run?

13 A Sometimes, you know, in my opinion, some networks would be very difficult
14 and ask us to prove things that were not, again, objective facts but were political
15 opinions. Sometimes it was a matter of maybe tweaking a number or tweaking the
16 phrasing in an ad so that a network felt that it was comfortable and defensible. So, I
17 mean, broadly, yes, we did that for pre-election ads.

18 Q Did you find that some networks were harder to get ads on for the campaign
19 and others were easier?

20 A Yeah. I would say that's fair, yeah.

21 Q And which networks were on the easy side?

22 A I mean, I don't know which were maybe easy. I can tell you which ones
23 were harder. CNN frequently had pushback to our ads, and Fox would sometimes as
24 well. And I think I generally only heard when a network had an issue with it, not when a
25 network was fine with it, if that makes sense.

1 Q It's fair to say you didn't hear any pushback regarding OAN or Newsmax?

2 A I may have, but, I mean, I would -- I don't recall specific pushback. I recall
3 specific pushback for CNN on several ads. I know that much.

4 Q Well, we're going to scroll up in this email. And, again, for the sake of time,
5 I'm not going to show you each part, but I will quickly summarize.

6 If you would just stop on the -- sorry. Yeah, right there.

7 Mr. Angle -- do you know who Ben Angle is from National Media?

8 A He was one of the ad guys. I think he did ad placement, if I remember
9 correctly.

10 Q So he says: "Zach and Jason, the more you guys can help on this
11 sourcing/backup information, the better."

12 And I would note in an earlier email he previously said that you would need to
13 have substantiation ready for these claims. He mentions that people voted, that ballots
14 magically appeared in the middle of the night.

15 Then we go up further in the email, and then you see that three scripts are
16 attached, and we're going to get to you --

17 If you keep scrolling. One second. Let me make sure I don't go too far.

18 All right. At the bottom of page 6 --

19 Scroll up a little bit, please. Okay.

20 Okay. You see yourself there. This is the first time you weigh in, and you say:
21 "Our legal team is the ones who'd have to substantiate these, as many of them I cannot.
22 Some of these claims (like suitcase full of ballots), networks can point to fact-checks like
23 this" -- and you appear to attach a link -- "and say it's not true."

24 Do you recall expressing to Jamestown and Mr. Miller that you couldn't
25 substantiate the claims in the TV ads or the scripts they circulated or at least some of the

1 claims?

2 A I don't recall this email, but, again, I'm not surprised. There would be
3 instances like this where I might be able to say that I can't substantiate something from
4 my position, and I would also point out to the ad makers that if we did try to run a claim,
5 networks could point to either reporting or fact-checkers and would likely use certain
6 pushback to say they did not want to air it.

7 So in this case, me pointing out the Georgia -- the Georgia example about
8 suitcases and ballots, you know, I think I was probably just saying you may not have luck
9 doing that, that would be difficult even if I produced substantiation -- some type of
10 substantiation from our end.

11 Q We're going to come back to this, but just if you could scroll up a little bit
12 further because you mention legal, and then Mr. Cannon responds here.

13 I think if you -- yeah, a little further up, on page 5.

14 And Mr. Cannon says: "I assure you that no one wants a lawyer writing their
15 scripts."

16 He says: "I suspect that S&P departments will have a hard time with these ads."

17 In the first one he says, "Suitcases of ballots. You all can judge from the video
18 what went on just as well as I can. I do not have a high degree of confidence that
19 networks will run this."

20 So here it appears that you and Mr. Cannon are both highlighting that, for
21 instance, the Georgia suitcase story can't -- those claims of that being fraud can't be
22 substantiated, and you're highlighting that for the ad team and Mr. Miller.

23 Is that will a fair read of what we're reading here?

24 A The only thing I would add is it's not just that we might not be able to
25 substantiate it but that we would not be able to substantiate to a network's liking and

1 that, in fact, that the network may come back and say, We have this reporting over here
2 which contradicts that and, as a result, we're not going to run the ad.

3 Q And it's fair to say on the Georgia suitcase of ballots claim that you did
4 research as to whether someone could rebuff claims of fraud with regard to what
5 happened there. Is that fair?

6 A I don't -- again, I don't recall when it I may have specifically looked at that
7 case. I know I obviously found that article, looked into some of the other articles I'm
8 sure that were out there at the time that were pushing back on that allegation. I don't
9 remember the specific research around it. But, yes, I did highlight what would be that
10 pushback.

11 Q And when you say -- when you do research as you did here, did you draw
12 your own conclusion? Because right now you're saying there are claims in the TV ad,
13 there is contemporary reporting. Would you draw your own conclusion as to whether
14 or not you believed that that video reflected a fraudulent act or it did not?

15 A Did I have a personal opinion?

16 Q Yeah. Let's go with that first. Did you have a personal opinion?

17 A I don't remember exactly what I was thinking at this time, but as an example
18 like that would come up, if I were to look at the information, my job was to say what we
19 can and can't show. But based off of that, I could form an opinion and say, yeah, I don't
20 think that's likely to be true or maybe it's questionable. But, again, mostly what we're
21 supposed to do and what I was trying to do was to say this is what I think we can
22 substantiate and here is what they would push back on that substantiation with even if
23 we did it.

24 Q So in instances like this where the campaign lawyer, Mr. Cannon, agrees with
25 you it appears, and then you also had previously said you would substantiate it and you

1 would point it to legal, which would have been Mr. Cannon, in that case where both legal
2 and research said they can't substantiate something, what was your understanding of
3 what would happen next? And also what happened here, what, in fact, did happen next
4 here?

5 A I mean, I don't recall what happened next. Normally in a circumstance like
6 that, I would have -- I probably would have assumed that they would try a different -- you
7 know, either a different claim there or a different phrasing or language. In my
8 experience Larry would often push back pretty hard on suggestions that we modify
9 specific language, and that was in -- you know, I'm talking about pre-election ads he
10 would do that.

11 So, I mean, did I have certain expectation of what would happen after this? I'm
12 not sure if I did.

13 Q Do you have a recollection of anyone, including Mr. Miller or Mr. Weitzner,
14 coming back to you for further research or to weigh in on the Georgia ballot issue, the
15 Georgia suitcase story?

16 A They may have, but I don't recall it.

17 BY [REDACTED]:

18 Q One other thing. Mr. Parkinson, did you ever -- were you generally familiar
19 with what the claim was regarding suitcases of ballots in Georgia?

20 A At the time, I think broadly, but, I mean, I don't think I've looked at that in a
21 very long time.

22 Q Do you remember that Mr. Giuliani testified at a -- not a real hearing,
23 but -- well, at a hearing in Georgia that there were suitcases of ballots that were pulled
24 out from under a table, fake ballots, and they were counted with no one watching?

25 A I don't specifically remember that, but I know that there were campaign

1 surrogates and allies who were certainly pushing that story.

2 Q Did you ever watch the video?

3 A Of the hearing?

4 Q No. Sorry. That's a fair point. No, the video of the State Farm Arena
5 that supposedly showed fake ballots being pulled out from under a table.

6 A I don't remember watching it, but I would assume that I did at the time.

7 Q Do you remember watching a video and thinking this doesn't depict at all
8 what Mr. Giuliani is telling people?

9 A I don't remember what my reaction was to just watching the video. That I
10 don't know.

11 Q And to be clear, there was a video that was released and promoted by the
12 Trump campaign, and then subsequently there was a more complete video that put that
13 edited video into context. And I'm asking if you ever saw that longer video.

14 A That I don't know. That I don't know.

15 Q Okay.

16 BY [REDACTED]:

17 Q Are you aware of another round of TV ads that began around
18 December 20th, so a few weeks after this?

19 A I don't think I -- I don't think I remember that, no.

20 Q All right. I think we're going to turn closer to January 6th now.
21 Give us one second.

22 Oh, Dave, if we could just take -- go into recess, take a 5-minute break, and then
23 we'll come back. We just want to get where we are and be efficient with our time.

24 Mr. Warrington. Okay.

25 [REDACTED]. Does that work for you, Mr. Parkinson and Dave?

1 Mr. Warrington. Come back at 3:50?

2 ██████████. Sure. We'll be ready in a few, but, yeah, you just take
3 the time that you need, but let's take at least 5 minutes.

4 Mr. Warrington. Okay.

5 ██████████. All right. Thanks.

6 [Recess.]

1 [3:51 p.m.]

2 ██████████. All right. Coming back from a little recess.

3 BY ██████████:

4 Q Mr. Parkinson, thanks for hanging in there. We're getting close to finishing.

5 We're going to show you a document that comes end of December. This is
6 document 23. And it's an email from Jason Miller to Mr. Murtaugh, Mr. Hahn, you, Gary
7 Coby, and a variety of individuals in the comms departments.

8 And then we're going to start at the bottom of the second page, please. And it's
9 about January 6th. If you can zoom in a bit, please.

10 And Mr. Miller says: Team, we need to build out a comms plan for the 6th that
11 will be the blowout of all media blowouts. National and targets State op-eds, around
12 the clock national contested State TV and radio bookings, social media amplification of
13 Hill and rally activities. You name it.

14 Tim and I will be in touch with everyone over the next 24 hours or so to get your
15 feedback for tactical items to include from your lanes, so we can see where they fit into
16 the broader strategic goals. So please start thinking about this. We have the biggest
17 amplifier in all of this with the President, but we need other voices leading the charge.

18 Do you have any recollection of getting this email from Mr. Miller?

19 A Broadly, I remember getting this email, yes.

20 Q And tell us what you recall doing in response to this email?

21 A I think I remember thinking I didn't really know what specifically my role in
22 this would be. I mean, the specifics that -- that Jason mentions are, you know, bookings
23 and op-eds, social media, which were generally not my lane.

24 So I think I kind of remember thinking I had to see -- I was waiting to see what else
25 he would follow up with to see what he wanted me to do.

1 Q And do you have any recollection as to whether he did follow up with you or
2 anyone else follow up with you regarding this?

3 A I don't know. I actually -- let me see. I think I may have been out of D.C.
4 at this time. No, I think I -- I think I was back. Yeah, I think I was back.

5 No, I don't -- I don't really recall a followup from Jason.

6 Q How about a followup from Mr. Murtaugh?

7 A I think at some point we may have texted about it, but I -- I don't recall the
8 specifics of the conversation.

9 Q If you could scroll up, please.

10 Here we'll see that Mr. Murtaugh responds to the chain and says: I think we will
11 need a list of all of the members who are known to say they will object on the 6th. Will
12 it be possible to enlist Mark Serrano's team to write op-eds or at least Teddy Goodman?

13 Does that help refresh any conversations you may have had with Mr. Murtaugh as
14 to the next steps?

15 A I don't think so. I mean, Serrano -- I believe he was a vendor whose team
16 helped produce op-eds, and Ted Goodman worked on the campaign and he did a lot of
17 work around op-eds. I don't know -- yeah, I don't know -- I don't recall a followup to
18 this, no.

19 Q Do you recall what, if anything, the comms department did in the next
20 6 days after this email leading up to the 6th?

21 A I believe we were doing some bookings leading up to it. I don't remember
22 the specifics, but I'm sure we did some social media in the lead-up to it. But I don't -- I
23 don't really recall the specifics of the work that may have been done in that week
24 between December 30th and January 6th.

25 Q And when you say "bookings," you mean getting people on to TV shows?

1 A Yes. Yes.

2 Q And what did you understand that the effort that you were engaged in to be
3 working towards?

4 A To be blunt, I don't -- I don't really remember thinking what -- the end
5 plan was. This would have been the tail end of December. I believe right after
6 Christmas, I'm pretty sure I went up to -- I think it's right after Christmas. My father
7 lived in Maine and so I went up -- I believe it was the weekend prior to this -- with my
8 mother and my brothers to try and, you know, sort out his house.

9 So at the time, I mean, in general, I was very tired, I was exhausted, and I don't
10 know if I really thought through what the larger plan was.

11 Q What was the messaging strategy, if you recall?

12 A I don't really recall, to be frank.

13 Q So we get to the 6th. Where were you on the 6th?

14 A I believe for most of the day I was at home. At one point in the middle of
15 the day I went grocery shopping, if I remember correctly. And then at another point in
16 the early evening, I went to go pick up my wife who works on the Hill. I believe I picked
17 her and a coworker up, drove the coworker home -- I believe it was in Virginia -- and then
18 I returned home. I believe that's -- I believe that's all the places I was on the 6th.

19 Q Where did you -- where were you when you first heard that things were
20 going sideways at the Capitol?

21 A I think it's when I returned home from -- from grocery shopping. I think -- I
22 don't remember who specifically -- I think someone gave me a phone call. I think
23 someone may have called to ask me about my wife and to check and see if she was okay,
24 something like that. But I don't think I found out about it until, I don't know, I want to
25 say -- I'm not sure, but I would say, you know, 1:00 or 2:00, something like that.

1 Q And then when you found out about it, what did you do next?

2 A I'm sure at some point -- I don't remember the specifics -- but I'm sure I
3 contacted my wife to make sure she was okay. And then I think I watched -- you know, I
4 watched some coverage of it, tried to monitor it. But I don't recall doing much else
5 besides that.

6 Q Did you recall having conversations with other campaign senior individuals
7 that day, whether Tim Murtaugh, Jason Miller, Matt Wolking, anyone like that?

8 A I think at some point I had a text or maybe a call with Matt and/or Tim,
9 where we -- I think I had just asked what the messaging guidance might be and what we
10 were supposed to be saying around it. But I don't remember -- I don't remember
11 specifics much beyond that.

12 Q And is that -- when you say the guidance, are you asking Tim for that
13 guidance?

14 A I probably -- I don't remember. I probably would've asked either him or
15 Matt. When it comes to messaging guidance, it wasn't always necessarily just from one
16 source. So I may have checked with both of them, but I don't really remember.

17 Q Let's go to exhibit 32.

18 Now, this is a text message between you, I think Tim Murtaugh, and Matt
19 Wolking. And Tim Murtaugh on the 6th sends you a screenshot of President Trump's
20 tweet at 6:01 p.m. and with a message saying, "I don't even know what to say about
21 that."

22 Looks like Matt says that part. I think -- or is it -- I think that's Tim. Yeah.

23 And then you respond, "Has anyone received any guidance? I don't think there's
24 anything to say."

25 Can you explain to us what you meant in here in responding -- what you

1 understood Mr. Murtaugh to be saying and then what you said in response?

2 A I don't remember -- I don't remember this conversation specifically, but I'm
3 sure -- or shouldn't say -- I imagine what Tim was getting at was that, as the
4 communications director on the campaign, he didn't necessarily know what to -- whether
5 it's on social media, to echo off of that or what we were supposed to be saying to maybe
6 reporters who were reaching out to him.

7 I think what I was trying to say probably was that I didn't think there was
8 necessarily something that we should be saying. As I recall, I think we probably -- this is
9 one of the instances where we were probably waiting for the White House to weigh in
10 more so that we didn't get out in front of anyone. So I imagine that's broadly what we
11 were getting at here.

12 Q Well, just unpack that. The President calls the folks who attack the Capitol,
13 it appears to be, "great patriots who have been badly and unfairly treated for so long."
14 And he says, Go home with love and in peace," and, "Remember this day forever!"

15 So is it a fair read that when Mr. Murtaugh says, "I don't even know what to say
16 about that," that he's not talking about a comms response to the press, but he's talking
17 about he's at a loss for words that the President released this in a tweet after the attack
18 on the Capitol?

19 A I mean, you'd have to ask Tim. I think --

20 Q Well, I'm asking you whether -- is that consistent with how you read this or
21 inconsistent? Did you read it as something else?

22 A I don't remember how I read it. I do remember being confused by the
23 messaging that was coming out of the White House. In my personal view, I remember
24 not being sure what they would want us to actually say. I remember the tweets and the
25 video.

1 I did not think there was a clear message that we were being told that we should
2 be echoing. And I think as my text says, I hadn't heard or I don't recall hearing from
3 anyone, hey, here's what you should be out there saying or what you should be tweeting
4 about this, or, if reporters ask, here's what you should be saying.

5 Q So your response here when you say, I don't think there's anything to say, is
6 your testimony that that wasn't expressing dismay at the President's tweet but was
7 instead talking about comms messaging?

8 A I don't remember saying this. I may -- that may have been the intention, I
9 don't know. I -- the way I read this, I think I was saying that there was nothing for us to
10 say as campaign staffers at that time.

11 Q Let's look at exhibit 33.

12 So this is now -- it's 9:17 p.m. on the night of the 6th.

13 If you scroll down, please. Yeah.

14 And then Matt Wolking in this group chat says, "Zach and I are going to call you in
15 a few minutes."

16 Mr. Murtaugh says, "Okay."

17 You send a message saying, "Still doing this?"

18 Mr. Murtaugh responds, "I'm here."

19 And then you indicate, "Sounds like Matt is taking a call from Jason, but we'll call
20 you as soon as that's done."

21 It seems here that you're going back to Mr. Murtaugh for more guidance. Do
22 you recall speaking with him that night and getting more guidance?

23 A I think we had a phone call. I think we ended up having a phone call, but I
24 don't really remember the discussion.

25 [REDACTED] Do you remember talking to Matt and having some discussion

1 around -- along the lines of we need to be in touch with Tim for some reason, that you
2 needed to reach him and run something by him or get his input on something?

3 The Witness. I don't know. I really don't. I don't recall -- I'm pretty sure we
4 ended up connecting over a phone call, but outside of that, I don't really remember the
5 circumstances of the call.

6 ██████████. Jason Miller spoke to the President that night, might be right around
7 this timeframe. Do you know if he shared with Matt and Matt shared with you any part
8 of a discussion that Mr. Miller had with the President on the night of the 6th?

9 The Witness. I don't recall anything like that. I don't recall anything like that.

10 ██████████. So the 6th is a Wednesday, and then we're going to jump
11 forward to January 11th, but do you recall what the comms team was doing the days
12 after the 6th? Do you have any recollection of what you all were doing, the messaging
13 or otherwise what comms was engaged in?

14 The Witness. As best I can remember, and we were out of the office at this
15 point, so I don't really remember having a lot of discussions with folks, but I remember
16 broadly not really being sure what we were supposed to be saying or what the message
17 was. I mean, the specifics of the few days after January 6th, I don't -- I don't really recall
18 specific discussions about messaging, no.

19 ██████████. Let's go to exhibit 34, please.

20 And this is, again, the same email group chat between you and Mr. Murtaugh and
21 Mr. Wolking. On Monday, January 11th, Mr. Murtaugh sends out a link to an NPR
22 tweet, which I will represent to you --

23 ██████████. It's 35.

24 ██████████. Oh, okay. Yeah.

25 It's -- if you go to exhibit 35 quickly, please, the tweet here is, "The New York State

1 Bar Association is considering expelling Rudy Giuliani, saying his remarks at the Capitol
2 insurrection 'quite clearly were intended to encourage Trump supporters...to take
3 matters into their own hands."

4 And then going back to exhibit 34, Mr. Murtaugh, after sending you that tweet,
5 says, "Why wouldn't they expel him based solely on the outrageous lies he told for 2-1/2
6 months?"

7 And then you respond, "I think they can only get them for lies in court, not
8 outside. The trial by combat shit is pretty bad though."

9 Do you recall, generally speaking, this exchange with Mr. Murtaugh?

10 The Witness. I don't, but I know the trial by combat thing, I'm pretty sure, is
11 something that Rudy said at some point. I don't recall this text message specifically
12 when it happened, though.

13 BY [REDACTED] :

14 Q Why did you think that that trial by combat comment was bad -- was pretty
15 bad?

16 A I don't -- I don't remember what I was thinking at the time, but I imagine it
17 was something along the lines of, you know, inflammatory language, you know, just from
18 a communications perspective is not -- was not helpful and was definitely a bad look,
19 obviously, after what happened on January 6th.

20 Q Did you share Mr. Murtaugh's assessment in the text message just above
21 yours where he said that Mr. Giuliani had been spreading outrageous lies for 2-1/2
22 months?

23 A I don't know what exactly I thought at the time. I remember, in general,
24 and, again, I think some of the text messages show this, thinking that Rudy and Jenna and
25 Sidney Powell had not been helpful to the campaign or to the President in his legal efforts

1 and that, you know, things that he were saying were stuff that -- you know, were things
2 that just generally were not helpful.

3 Q Yeah. I recalled that's how you framed it this morning while we were
4 talking about it. But Mr. Murtaugh's comments are much more blunt than that, and I'm
5 wondering whether you shared his views that they were -- that Mr. Giuliani had spread
6 outrageous lies for 2-1/2 months?

7 A I mean, I don't know if that's how I would've phrased it. Yeah, I'm not sure
8 that I would've phrased it that way. I would, again, say I think he said things that were
9 not helpful to the campaign or were not helpful to the President. I don't know if I ever
10 phrased it that way, but I know Tim was certainly very frustrated as the communications
11 director at that time, and so I -- I certainly understand why he felt that way.

12 [REDACTED]. I want to return back to the trial by combat, because
13 you've talked about it just -- talking about -- go further on Mr. Harris's point.

14 Separate from how it was for a comms perspective, did you find that language to
15 be problematic because of the effect it could have on the listener?

16 The Witness. The effect it could have on who? I'm sorry.

17 [REDACTED]. On the person hearing it. Hearing that kind of language,
18 was it just pretty bad from a comms perspective or was it pretty bad substantively
19 because of the effect it had on those hearing it or could have?

20 The Witness. I mean, I don't remember exactly what I was thinking at the time.
21 I would say, probably thinking more from the communications perspective, having been
22 on the campaign for nearly 2 years at that point, I had certainly seen a lot of inflammatory
23 rhetoric from both parties, both candidates, their surrogates. And so did I think that
24 that rhetoric in and of itself was, you know, cause for concern outside of a
25 communications perspective, I don't know.

1 BY [REDACTED]:

2 Q Were you troubled by what happened at the Capitol on January 6th?

3 A I was certainly concerned for -- I mean, what specifically are you talking
4 about? You talking about the violence?

5 Q Yes.

6 A I was certainly concerned for my wife. My wife works there, and I wanted
7 to -- I was concerned for her safety. So, I mean, specifically the violence, obviously, I
8 think that was horrible.

9 Q Were you concerned that the people who pursued that violence had been
10 riled up to the point that they might be violent going forward?

11 A I mean, possibly. I mean, the other text message that you have, I think I
12 probably was concerned about individuals like that and what they might do. But outside
13 of that, I don't really recall thinking about it that much.

14 Q So, yeah, if we scroll down just a little bit in that text message, there's a back
15 and forth with Mr. Murtaugh. And he says -- keep going, [REDACTED]. Yeah. You can
16 stop right there.

17 He says that, "One week ago tonight we hadn't lost Georgia yet and the riot hadn't
18 happened."

19 And you say, "We still have 9 days to inauguration. That's the scary part."

20 Why did you think it was scary that there were 9 more days to inauguration?

21 A I mean, I don't recall sending this, but I imagine -- I should say, I remember
22 after January 6th, between that date and inauguration day, being concerned that there
23 could be, you know, a similar type of violence. Obviously, the election was and the
24 months after the election were incredibly heated and, you know, for the sake of the
25 country, you know, I don't think I imagined -- I definitely did not imagine what happened

1 on January 6th happening, ahead of time.

2 And so I remember in the lead-up to the inauguration, just generally being
3 concerned for the country about what might happen during those days.

4 Q At the very bottom of this text exchange, Mr. Wolking says -- well, it's in the
5 bottom of the exhibit. I don't know how much further the exchange goes -- "The
6 rumblings about armed protests across the country on the 20th make me nervous."

7 Had you discussed that issue with Mr. Wolking, your concern about possible more
8 violence before the inauguration and him talking about armed protests around the
9 country making him nervous?

10 A I don't know if we discussed it. I know that I was aware of those, as Matt
11 says, those rumblings, those reports and news stories, and so that was something I was
12 concerned about, yes.

13 Q Had you talked with Mr. Wolking about that on the 6th itself, about how this
14 is not a good situation and it could get worse?

15 A I don't recall the specifics of the conversation. Again, I believe we had a
16 phone call with Tim that night. I don't recall the specifics of the conversation. I mean,
17 I certainly -- I can't -- so I don't remember what he might've said. I certainly was -- you
18 know, I was upset by what had happened. I thought it was very bad for the country, and
19 the possibility for more violence was certainly -- especially with the reporting around it,
20 was certainly something that concerned me, yes.

21 Q You said that you thought that Mr. Giuliani's comments about trial by
22 combat may have instigated some of the violence.

23 When you talked to Mr. -- when you and Mr. Wolking talked about talking to Mr.
24 Murtaugh, was part of the discussion you wanted to have with him the fact that you
25 believed that some of the messaging of the Trump campaign may have contributed to the

1 violence that was happening at the Capitol?

2 A Just to be clear, I don't think that's what my text message is saying. I don't
3 think I'm saying that -- I don't think I was saying that that instigated violence. I think I
4 was saying that it was obviously in the wake of the riot that day. Obviously, you know,
5 very troubling and was not a good look.

6 In terms of did I discuss that with Matt and Tim more outside of this text message,
7 I do not recall.

8 Q Do you recall being concerned that the rhetoric of the Trump campaign
9 leading up to the 6th had contributed to the attack on the Capitol and the violence?

10 A As best I can remember, I do not recall being troubled about the campaign's
11 rhetoric specifically. I was much more concerned about individuals and outside groups
12 and what they might be spreading over what the campaign had said.

13 Q Which individuals and outside groups were you concerned about?

14 A Not -- you know, not specific groups, but having worked on the campaign,
15 having monitored social media, right, there were certainly people online. You know, the
16 folks who were involved in January 6th, I know that just from reporting, many of them
17 communicated online. You know, I was more concerned, again, about outside groups
18 and actors and individuals who were planning to be violent.

19 Q What messaging were you aware of -- the online messaging that you're
20 talking about or things that were being said online, were you aware of that before the
21 6th?

22 A I don't recall that. I mean, whatever at that point I would've seen, I think I
23 would've seen through -- through news reports, if I did. But I don't -- I don't really recall
24 when I became aware that there might be -- there might be some type of violence.

25 Q You think it might have been before the 6th, but it might have been after

1 that you became aware?

2 A I just -- obviously, I knew ahead of time that there would be some type of
3 protests, but, you know, specifics of there being threats or individuals or actors who were
4 intent on being violent, anything like that I would've -- I believe I would've just seen from,
5 again, news reports.

6 Q What news report -- do you have a particular news report in mind that
7 brought that to your attention before the 6th?

8 A No, I don't think so. Again, this is just broadly. I'm not saying that -- that I
9 had any type of, you know, awareness of specific things, but I know that there were news
10 reports I think around most of the protests that occurred between election day and
11 inauguration day warning of possible violence or, you know, disruption.

12 I remember in, I think it was November, one of the election protests that occurred
13 in D.C. became kind of violent. You know, again, so just a general awareness that these
14 protests and interactions between protesters could become violent.

15 Q Any discussions within the Trump campaign's comms team before
16 January 6th about what other people were hearing or learning or seeing in news reports
17 or online regarding potential violence?

18 A Not that I can recall, no.

19 [REDACTED] Dave, if you could give us 2 seconds.

20 Mr. Warrington. Okay.

21 [Discussion off the record.]

22 [REDACTED] Okay. Let's take a quick 5-minute break. We're getting
23 close to the end, but we just want to circle -- but we're almost done.

24 Mr. Warrington. Like how much almost done?

25 [REDACTED] Like very much almost done, so we want to -- we don't

1 want to use up necessary time. Just give us 2 or 3 minutes to circle up and talk, and
2 then -- all right? We'll be back in 3 minutes.

3 Mr. Warrington. Yeah.

4 [Recess.]

5 [REDACTED] Dave, we're ready when you are.

6 Mr. Warrington. Okay. We're ready.

7 [REDACTED] All right. Well, Mr. Parkinson, I think that's all the
8 questions we have for you. I know it's been a long day, so thank you for taking out the
9 time and answering our questions.

10 Yeah. Dave, anything else from you before we go off?

11 Mr. Warrington. No. I just want to thank you for the accommodation for, you
12 know, [REDACTED]. Hopefully, I'll try to keep [REDACTED] as much as
13 possible.

14 [REDACTED]. Well, we wish you well with all of that.

15 But all right. Then we will be in recess, subject to the call of the chair.

16 Thank you, everyone, and we'll be in touch.

17 Mr. Warrington. Thank you.

18 [Whereupon, at 4:27 p.m., the deposition was recessed, subject to the call of the
19 chair.]

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

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10 Witness Name

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Witness Name

Date