

1 IN THE UNITED STATES DISTRICT COURT
2 FOR THE WESTERN DISTRICT OF LOUISIANA
3 MONROE DIVISION
4 - - - - - x
5 STATE OF MISSOURI ex rel., :
6 ERIC S. SCHMITT, Attorney :
7 General, STATE OF :
8 LOUISIANA ex rel. JEFFREY :
9 M. LANDRY, Attorney :
10 General, DR. JAYANTA :
11 BHATTACHARYA, JILL HINES, :
12 JIM HOFT, DR. AARON :
13 KHERIATY, and DR. MARTIN :
14 KULLDORFF, :
15 Plaintiffs, : No.
16 v. : 3:22-cv-01213-TAD-KDM
17 JOSEPH R. BIDEN, JR., in :
18 his official capacity as :
19 President of the United :
20 States; :
21 KARINE JEAN-PIERRE in her :
22 Official capacity as White:
23 House Press Secretary; :
24 VIVEK H. MURTHY, in his :
25 Official capacity of :

1 Surgeon General of the :
2 United States; :
3 XAVIER BECERRA, in his :
4 Official capacity as :
5 Secretary of the :
6 Department of Health and :
7 Human Services; :
8 DEPARTMENT OF HEALTH AND :
9 HUMAN SERVICES; :
10 DR. ANTHONY FAUCI, in his :
11 Official capacity as :
12 Director of the National :
13 Institute of Allergy and :
14 Infectious Diseases and as :
15 Chief Medical Advisor to :
16 the President; :
17 NATIONAL INSTITUTE OF :
18 ALLERGY AND INFECTIOUS :
19 DISEASES; :
20 CENTERS FOR DISEASE : No.
21 CONTROL AND PREVENTION; : 3:22-cv-01213-TAD-KDM
22 CAROL Y. CRAWFORD, in her :
23 Official capacity as Chief :
24 of the Digital Media :
25 Branch of the Division of :

1 Public Affairs within the :
2 Centers for Disease :
3 Control and Prevention; :
4 UNITED STATES CENSUS :
5 BUREAU, a.k.a. BUREAU OF :
6 THE CENSUS; :
7 JENNIFER SHOPKORN, in her :
8 Official capacity as :
9 Senior Advisor for :
10 Communications with the :
11 U.S. Census Bureau; :
12 DEPARTMENT OF COMMERCE; :
13 ALEJANDRO MAYORKAS, in his :
14 Official capacity as :
15 Secretary of the :
16 Department of Homeland :
17 Security; :
18 ROBERT SILVERS, in his :
19 Official capacity as Under :
20 Secretary of the Office of :
21 Strategy, Policy, and :
22 Plans, within DHS; :
23 SAMANTHA VINOGRAD, in her :
24 Official capacity as :
25 Senior Counselor for :

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2 Office of the Secretary :
3 For DHS; :
4 DEPARTMENT OF HOMELAND :
5 SECURITY; :
6 JEN EASTERLY, in her :
7 Official capacity as :
8 Director of the :
9 Cybersecurity and :
10 Infrastructure Security :
11 Agency; :
12 CYBERSECURITY AND :
13 INFRASTRUCTURE SECURITY :
14 AGENCY; :
15 GINA McCARTHY, in her :
16 Official capacity as White: :
17 House National Climate :
18 Advisor, and :
19 NINA JANKOWICZ, in her :
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22 "Disinformation Governance: :
23 Board" within the :
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25 Security, :

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4 Advisor, :
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8 President and Director of :
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11 COURTNEY ROWE, in her :
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15 And Engagement, :
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DANIEL KIMMAGE 11/10/2022

Page 12

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2 Department's Global :
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5 His official capacity as :
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7 and/or Senior Advisor for :
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10 Department, :
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16 ALEXIS FRISBIE, in her :
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20 Global Engagement Center :
21 at the State Department, :
22 U.S. DEPARTMENT OF :
23 TREASURY, :
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9 KRISTEN MUTHIG, in her :
10 Official capacity as :
11 Director of Communications:
12 for the EAC, :
13 Defendants. :

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Videotaped Deposition of DANIEL KIMMAGE
Thursday, November 10, 2022
10:04 a.m.

Job No.: 135884
Pages 1 through 304
Reported by: Cassandra E. Ellis, RPR

1 Deposition of DANIEL KIMMAGE, held
2 pursuant to agreement, before Cassandra E. Ellis,
3 Certified Shorthand Reporter -- Hawaii #475,
4 Certified Court Reporter - Washington #3484,
5 Certified Shorthand Reporter - California -
6 #14448, Registered Professional Reporter #823848,
7 Certified Realtime Reporter, Realtime Systems
8 Administrator, and Notary Public of The District
9 of Columbia.

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3 J O H N J . V E C C H I O N E , E S Q U I R E
4 J E N I N Y O U N E S , E S Q U I R E
5 N E W C I V I L L I B E R T I E S A L L I A N C E
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10 J e n i n y o u n e s @ n c l a . l e g a l

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13 O N B E H A L F O F U . S . D E P A R T M E N T O F S T A T E :
14 M E H A A . S H A H , E S Q U I R E
15 P U B L I C D I P L O M A C Y A N D P U B L I C A F F A I R S
16 S A - 5 , S u i t e 5 H 0 3
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23 A L S O P R E S E N T :
24 J o s e p h E . E l l i s , C e r t i f i e d L e g a l V i d e o S p e c i a l i s t
25

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1 P R O C E E D I N G S

2 THE VIDEOGRAPHER: Good morning.

3 This is the beginning of the media in the
4 deposition of Daniel Kimmage taken in the matter
5 of the State of Missouri, et al., plaintiffs
6 versus Joseph R. Biden, Junior, et al.,
7 defendants, with a Case Number
8 3:22-CV-01213-TAD-KDM, held in the United States
9 District Court for the Western District of
10 Louisiana, Monroe division.

11 Today's date is November 10th,
12 2022, and the time on the monitor is
13 approximately 10:04 a.m.

14 My name is Joseph Ellis. I'm the
15 certified legal videographer. The court
16 reporter is Cassandra Ellis. And we are here
17 representing Lexitas Deposition Services.

18 Counsel appearances will be noted
19 on the stenographic record, only.

20 Will the court reporter please
21 swear in the witness, then you may proceed.

22 ///

23 ///

24 ///

25 ///

1 DANIEL KIMMAGE

2 having been duly sworn, testified as follows:

3 EXAMINATION

4 BY MR. SAUER:

5 Q. Could you please state your name,
6 for the record?

7 A. Daniel Kimmage.

8 Q. And Mr. Kimmage, what's your
9 current title?

10 MR. KIRSCHNER: Mr. Sauer, I just
11 wanted to put something on the record before we
12 got started, just before you start going into
13 the -- to the basics.

14 I just wanted to put on the record
15 that yesterday, November 9th, 2022, the
16 defendants moved for a protective order
17 concerning this deposition, and other
18 depositions, to protect the -- related to the
19 dissemination of the video of the deposition,
20 and also related to certain personal information
21 that may be discussed at the deposition.

22 Yesterday -- today, in docket entry
23 111, the Court temporarily granted that motion
24 to allow for the briefing of this issue, and we
25 ask that plaintiffs abide by that order.

1 MR. SAUER: Plaintiffs will abide
2 by that order, and will respond to the motion in
3 due course on the Court's briefing schedule.

4 BY MR. SAUER:

5 Q. Mr. Kimmage, what's your current
6 title?

7 A. My title is principal deputy
8 coordinator of the Global Engagement Center.

9 Q. And at various times you've been
10 acting coordinator as well as principal deputy
11 coordinator of that; is that right?

12 A. Yes.

13 Q. How long have you been at the
14 Global Engagement Center for the State
15 Department?

16 A. Since January, I think January
17 21st, 2017.

18 Q. Let me ask you this: Have you ever
19 been deposed before?

20 A. No.

21 Q. So can I just go through some
22 ground rule type questions?

23 A. Sure.

24 Q. One thing is when I ask a question
25 could you wait until I finish the question

1 before you respond?

2 A. Mm-hmm. Yes.

3 Q. Next thing is, could you give an
4 oral response to all my questions, because the
5 court reporter is transcribing, so a nod doesn't
6 come across, necessarily, in the transcripts,
7 can you give an oral response to all my
8 questions?

9 A. Yes.

10 Q. And I'm a bad offender at this, but
11 can you and I be careful not to interrupt each
12 other?

13 A. Yes.

14 Q. And if at any time, I would like
15 you to listen carefully to the question that I'm
16 asking and answer the question that I'm asking,
17 as we go forward, are you willing to do that?

18 A. Yes.

19 Q. And if at any time you don't
20 understand the question, could you ask me for
21 clarification rather than answer a question that
22 you're not sure that I asked?

23 A. Yes.

24 Q. Okay. So you've been at the Global
25 Engagement Center for about five years; is that

1 fair to say, beginning of 2017?

2 A. Since January 21st, 2017, with --
3 with breaks.

4 Q. And prior to that, and breaks
5 include a stint at the National Defense
6 University, that was fairly recent; is that
7 right?

8 A. Yes.

9 Q. How -- how recently did you come
10 back to the Global Engagement Center from the
11 National Defense University?

12 A. In July 2022, July of this year.

13 Q. And that was a 10-month stint, you
14 were away for 10 months at that university?

15 A. Yes.

16 Q. And you've been back for about four
17 months, since then?

18 A. Yes.

19 Q. I may ask you other things today,
20 about stuff that may have happened while you
21 were gone, in which case I'm just asking you to
22 respond to the best of your knowledge; is that
23 fair to say?

24 A. Yeah.

25 Q. Okay. Other than that 10-month

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1 period, were there other periods where you were
2 not at the Global Engagement Center?

3 A. Before January 21st, 2017, I was in
4 the Office of Policy Planning.

5 Q. But between January 1st, 2017 and
6 now, other than the 10-month interruption at the
7 NDU, you've been continuously at the Global
8 Engagement Center?

9 A. Yes.

10 Q. And during that time period, you've
11 been in a senior role, either as acting
12 coordinator or a principal deputy coordinator;
13 fair to say?

14 A. Correct.

15 Q. And I take it the difference
16 between those two, executive coordinator -- is
17 the coordinator a senate-confirmed position?

18 A. It is not.

19 Q. Well, let me ask this: Can you
20 describe, generally, what the Global Engagement
21 Center does?

22 A. The Global Engagement Center has a
23 congressional mandate, it comes from the 2017
24 National Defense Authorization Act to direct and
25 lead the US government's efforts to counter

1 foreign propaganda and disinformation.

2 Q. Is the word disinformation in that
3 statute?

4 A. It is.

5 Q. Okay. So there's a congressional
6 mandate that counter foreign propaganda and
7 disinformation?

8 A. Yes.

9 Q. Is that -- and does the Global
10 Engagement Center carry on activities to
11 implement that mission?

12 A. Yes.

13 MR. KIRSCHNER: Objection, vague.

14 BY MR. SAUER:

15 Q. Can you describe the nature of
16 those activities?

17 MR. KIRSCHNER: Objection, calls
18 for a narrative.

19 BY MR. SAUER:

20 Q. You may answer if you understand
21 the question.

22 A. Could you clarify what you mean by
23 that?

24 Q. What does the Global Engagement
25 Center do to carry out its statutory mission,

1 **Q. And you'll understand that we're**
2 **talking about the Global Engagement Center;**
3 **correct?**

4 A. Yes.

5 **Q. What are the internal divisions or**
6 **teams within it?**

7 A. So there is -- there are teams that
8 focus on the major threat actors. There is a
9 China team, a Russia team, an Iran team, and a
10 counterterrorism team.

11 And then there are some sort of
12 structural support -- there's a resources team,
13 there's a front office, there's a -- I'm not
14 sure what the current name is, but there's an
15 interagency coordination team.

16 **Q. Is that the -- is that the I2C2?**

17 A. The I2C2, there's an interagency
18 coordination team, and there's a Technology
19 Engagement Team.

20 **Q. And that's sometimes referred to as**
21 **the TET?**

22 **(Reporter clarification)**

23 MR. SAUER: I think she was talking
24 to me.

25 MR. KIRSCHNER: I was also going to

1 ask: Can you let him finish his response
2 before -- before following up.

3 BY MR. SAUER:

4 Q. And is the Technology Engagement
5 Team called the TET?

6 A. Sometimes, yes.

7 Q. And do any of those divisions,
8 teams, or components interface directly with
9 social media companies?

10 A. The Technology Engagement Team does
11 engage with social media companies. The front
12 office and senior leadership engage with social
13 media companies, yes.

14 Q. So what does the TET do to engage
15 with social media companies?

16 MR. KIRSCHNER: Objection, vague.

17 BY MR. SAUER:

18 Q. Can you summarize that for us?

19 MR. KIRSCHNER: Objection, calling
20 for a narrative.

21 BY MR. SAUER:

22 Q. If you understand the question you
23 may answer.

24 A. They hold meetings.

25 Q. What do they discuss in the

1 meetings?

2 A. I'm not in the meetings that the
3 Technology Engagement Team holds with the social
4 media companies.

5 Q. Do you have any understanding of
6 what they discuss in the meetings?

7 A. Yeah, the -- the -- the general
8 thrust would be information exchange.

9 Q. And what -- what kind of
10 information is exchanged?

11 A. Primarily, the tools and techniques
12 that are adversaries. So malign actors like the
13 ones I listed, like Russia and China, how are
14 they using propaganda and disinformation.

15 Q. Is there discussion of technologies
16 that can be used to combat disinformation in
17 those meetings?

18 A. There certainly could be, tools,
19 for example.

20 Q. And is there a discussion of, you
21 know, content posted on social media that might
22 be of concern to the GEC, that's discussed with
23 social media companies in those meetings?

24 A. I think that would be rare. The
25 focus of the discussion would be at a higher

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1 conceptual level. It would be: How are these
2 actors doing what they do, not so much specific
3 pieces of content.

4 **Q. But do you think there may be rare**
5 **conversations where specific pieces of content**
6 **are discussed, of concern?**

7 A. Yes, I -- I couldn't rule it out.

8 **Q. Okay. And do you know of any**
9 **specific instance where that was done in these**
10 **TET meetings with social media companies?**

11 A. No.

12 **Q. How about the front office**
13 **engagement with social media companies that you**
14 **referred to, what's the nature of that?**

15 A. It's primarily relationship
16 building. So at the more senior level the
17 engagements that I would hold, the meetings I
18 would hold, it would be really relationship
19 building to facilitate better communication at
20 the working level.

21 **Q. So who would be present at a**
22 **meeting like that, on your side?**

23 A. On our side, it would be the acting
24 coordinator or the coordinator if -- or the
25 appointed coordinator, probably one or two of

1 the deputies, because there are deputy
2 coordinators, maybe a team chief, and then,
3 potentially, a member of a team with relevant
4 substantive expertise.

5 **Q. How frequently do those kinds of**
6 **meetings occur where someone at the coordinator**
7 **level and others are meeting directly with the**
8 **social media platforms?**

9 A. Every few months, can b e
10 quarterly, but sometimes less than quarterly.

11 **Q. What kind of topics are discussed**
12 **at those meetings?**

13 A. The tools and techniques of our
14 adversaries would probably be the number one
15 topic. So what are the campaigns we see,
16 foreign propaganda actors, like Russia, China,
17 Iran or terrorist organizations, what campaigns
18 are they conducting, what tools are they using,
19 potentially which narratives they're promoting.

20 And we would be in listening mode
21 for anything the companies wanted to share.

22 **Q. And you say what the companies**
23 **wanted to share, what sort of information might**
24 **that be?**

25 A. My recollection is that it was

1 fairly minimal.

2 Q. Can you think of an instance where
3 that happened, you referred to it just now?

4 A. They would also be looking for
5 Chinese disinformation campaigns, fairly general
6 information along those lines.

7 Q. And so they might flag for you, the
8 GEC representatives, content that they see on
9 their platforms that their concerns may be
10 originating from malign state actors?

11 MR. KIRSCHNER: Objection, assumes
12 evidence not in record.

13 BY MR. SAUER:

14 Q. You may answer if you understand
15 the question.

16 A. I don't recall discussions of
17 specific content. These would be higher-level
18 discussions along the lines of a campaign with a
19 narrative, but not specific content that would
20 be a part of the campaign.

21 Q. So they would not be flagging
22 specific posts, for example, but they might be
23 saying, hey, there's a narrative about, you
24 know, at a high-level description that's --
25 that's trending on their platform, something

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1 **like that?**

2 A. Yes.

3 **Q. Do you remember specific instances**
4 **where that kind of conversation occurred?**

5 A. No.

6 **Q. But you have the understanding that**
7 **that sort of thing would happen?**

8 A. Yes, general discussions of
9 campaigns.

10 **Q. And then on your side would you**
11 **also be discussing such campaigns?**

12 A. Yes.

13 **Q. And flagging them for them; is that**
14 **fair to say?**

15 A. Yes. But I wouldn't use the word
16 flagging. Flagging is generally associated with
17 specific content, that was generally not the
18 focus of our discussions, certainly not the ones
19 that I conducted.

20 **Q. So what discussions -- let me take**
21 **a concrete example, for example, that's in some**
22 **of the GECs online materials.**

23 I take it there was a campaign back
24 in the 1980s, from Russia and malign actors, to
25 try and accuse the United States of

1 manufacturing the AIDS virus in a laboratory in
2 the 1970s when, in fact, there's demonstrable
3 scientific evidence that it emerged in the
4 1950s, so this is kind of a Russian lie.

5 Is that at the sort of level of
6 specificity that you might be raising these
7 kinds of issues in these meetings with social
8 media platforms?

9 MR. KIRSCHNER: Objection, vague,
10 ambiguous.

11 BY MR. SAUER:

12 Q. If you understand, you may answer.

13 A. Yes, that is the -- the -- the
14 level of detail.

15 Q. Yeah, and I'm not asking -- I'm not
16 asking for a, hey, anything current.

17 A. Mm-hmm.

18 Q. But that would be the nature of
19 information, you might sit down with them and
20 say, hey, look, here's a malign foreign actor,
21 Russia, they are pushing this narrative out on
22 social media platforms using bots or whatever,
23 and, you know, here's the nature of the
24 narrative, and this is something to be on the
25 lookout for; is that a fair characterization of

1 **how those discussions go?**

2 A. Yes, with the caveat that we might
3 not say: Be on the lookout, it might be just
4 what we're seeing. Our interactions were not
5 directive with social media companies.

6 **Q. What's the purpose of advising them**
7 **of those narratives of concern, from your side?**

8 A. The purpose is to deepen their
9 understanding of the actions of malign actors
10 seeking to harm the national security in the
11 United States, in line with the GEC's
12 congressional mandate.

13 **Q. Is there a concern or is there an**
14 **indention that for particularly malign**
15 **narratives, that once they're advised of them**
16 **they might be equipped to enforce their content**
17 **standards against users or bots who post those**
18 **narratives?**

19 A. Could you clarify the question?

20 **Q. Is part of the purpose of raising**
21 **these narratives to inform the social media**
22 **companies on how they might apply their content**
23 **modulation policies against that kind of**
24 **content?**

25 MR. KIRSCHNER: Objection,

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1 ambiguous.

2 BY MR. SAUER:

3 **Q. You may answer, if you understand.**

4 A. No. Our purpose was not to effect
5 internal decisions at the social media
6 companies. Our purpose was to deepen their
7 understanding of the actions of malign actors.

8 **Q. And this -- these meetings occur**
9 **every few months; is that fair to say?**

10 A. At the senior level, every few
11 months.

12 **Q. How often do they occur with the**
13 **TET level?**

14 A. More frequently, but I don't know
15 the exact frequency.

16 **Q. Does the GEC engage in any**
17 **activities where the intention is to influence**
18 **or -- or at least propose to social media**
19 **companies that certain content might not be**
20 **posted on their platforms?**

21 MR. KIRSCHNER: Objection,
22 compound.

23 BY MR. SAUER:

24 **Q. You may respond, if you answer --**

25 A. No.

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1 Q. -- if you understand?

2 A. The GEC does not seek to influence
3 the decisions of the social media companies.

4 Q. Does a CE -- GEC seek to provide
5 information that might inform those decisions?

6 A. No. The GEC is not looking to
7 inform specific decisions. These are general
8 conversations about what we are seeing in the
9 environment. They're not geared toward
10 decisions that the social media companies may or
11 may not make.

12 Q. And are you aware of any instances,
13 whether in the context of these meetings or any
14 other context, where the GEC has been involved
15 in, you know, raising concerns to social media
16 companies, whether directly or indirectly, about
17 content posted on their platforms?

18 MR. KIRSCHNER: Objection,
19 compound.

20 A. Yes, I can recall one specific
21 instance --

22 Q. Can you tell me about that?

23 A. -- that -- with myself.

24 Q. Sorry, I didn't mean to interrupt.
25 Can you tell me about that?

1 A. Yes. I believe this was in 2018,
2 but I don't have the records in front of me. I
3 was informed by a colleague that there was a
4 security situation in a middle eastern country
5 where demonstrators or protesters were using a
6 social media platform to communicate, and the
7 Department was concerned for the safety of its
8 personnel.

9 And this was a concern that was
10 being tracked in realtime, at the highest levels
11 of the State Department. And that was the one
12 time that I recall that I did communicate
13 directly to a social media platform or
14 representative that this was an ongoing concern.
15 I was very specific in my interactions, simply
16 saying that this is a realtime situation where
17 we believe that the safety of our personnel is
18 at stake, and I would simply ask that you review
19 the activity on these accounts to make a
20 determination in line with your own terms of
21 service.

22 I did not ask for anything to be
23 removed, but I did have a direct interaction
24 about specific content motivated by security
25 concerns about the safety of our people.

1 Q. Were those posts foreign or
2 domestic?

3 A. All foreign.

4 Q. And what action was taken, to your
5 knowledge, by the social media platforms?

6 A. I don't know what specific action.
7 They did not report back to me.

8 Q. You mentioned that you, personally,
9 engaged in that interaction. Are you aware of
10 others in the GEC having any interactions of
11 that nature, where there's a discussion with
12 social media platforms about specific content of
13 concern?

14 A. No, I'm not.

15 Q. You're not aware of any other
16 personnel within your -- the GEC doing that on
17 any other occasion?

18 A. There were other personnel involved
19 in this interaction, but not beyond this
20 interaction.

21 Q. How many personnel are at the GEC?

22 A. I -- I believe it's between one and
23 two hundred now.

24 Q. Okay. And do they all ultimately
25 report to you, in your role as principal deputy

1 **coordinator?**

2 A. No. I'm -- I'm currently serving
3 as a senior advisor, so I'm not in a -- in a
4 direct management role.

5 When I was the acting coordinator,
6 they would have -- I would have been responsible
7 for the entire office. They would not have
8 reported directly to me. There's a chain of
9 command

10 And, you know, when I was the
11 principal deputy some would report to me, but
12 ultimately it would be the appointed coordinator
13 who was the head of the office.

14 **Q. Are -- how much knowledge do you**
15 **have of the office's activities in your role of**
16 **senior advisor? Do you have a good overview of**
17 **everything the office is doing or do you only**
18 **really oversee or, you know, get involved in**
19 **smaller portions of it?**

20 A. Currently, only in small portions.
21 I don't have an oversight role.

22 **Q. What are the -- what are those**
23 **smaller portions that you're involved in?**

24 A. Strategic issues of interest to the
25 acting coordinator.

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1 Q. Can you, without getting into too
2 much detail, can you tell us whether any of
3 those issues involved interaction with social
4 media platforms?

5 A. No, they do not.

6 Q. Your answer is: No, they do not?

7 A. No.

8 Q. But are you still participating in
9 these, you know, few monthly meetings with the
10 social media platforms?

11 A. No.

12 Q. That was something you did when you
13 were acting coordinator and deputy acting
14 coordinator?

15 A. Yes, only in my capacity as acting
16 coordinator or principal deputy coordinator.

17 Q. And that was a role that you held
18 from the beginning of 2017 until -- until about
19 a year ago or about 14 months ago?

20 A. Until June 2021.

21 MR. SAUER: Let me give you a
22 document. Let's call this Exhibit 1.

23 (Exhibit No. 1 was marked for
24 identification.)

25 MR. KIRSCHNER: Mr. Sauer, do you

1 only have one extra copy for us?

2 MR. SAUER: No, we've got two extra
3 copies.

4 MR. KIRSCHNER: Do you mind?

5 MR. SAUER: Yeah, that's fine.

6 That's fine.

7 BY MR. SAUER:

8 **Q. Do you recognize this document?**

9 A. Can you clarify what that means?

10 **Q. Have you ever seen it before?**

11 A. No.

12 **Q. So if you see at the top, it's a --**
13 **appears to be a White House press release from**
14 **January 28, 2016; right?**

15 A. Mm-hmm.

16 **Q. Is that right?**

17 A. Yes.

18 **Q. And it describes, I believe, the**
19 **creation by executive order of the Global**
20 **Engagement Center in the beginning of 2016;**
21 **right?**

22 MR. KIRSCHNER: Objection, assuming
23 facts not in evidence. Can the witness have an
24 opportunity to look at the document?

25 MR. SAUER: Sure.

1 BY MR. SAUER:

2 Q. And if it helps, if I can direct
3 your attention to the second sentence of the
4 second paragraph?

5 A. Mm-hmm.

6 Q. Talks about how the Department of
7 Homeland Security and the Department of Justice
8 will announce the establishment of a countering
9 violent extremism task force; correct?

10 A. Yes.

11 Q. And then it goes on to say: The
12 State Department will establish the Global
13 Engagement Center; is that fair to say?

14 A. Yes.

15 Q. So is this, to your understanding,
16 the beginning of how the GEC got going, created
17 by executive order in 2016?

18 MR. KIRSCHNER: Objection,
19 speculative.

20 BY MR. SAUER:

21 Q. If you know?

22 A. There was an executive order in
23 2016 that established the Global Engagement
24 Center. Subsequently, there was a provision in
25 the national defense authorization act that

1 created the Global Engagement Center in its
2 current iteration.

3 Q. So in other words, there was a
4 precursor that was created by executive order,
5 and then the 2017 NDAA gave it specific
6 statutory authorization?

7 A. Yes. They're separate -- separate
8 documents.

9 Q. This press release goes on to
10 say -- do you see the sentence in that paragraph
11 beginning: Additionally?

12 A. Yes.

13 Q. Today, some of the most senior
14 officials from the White House and across the
15 President's national security team are meeting
16 in Silicon Valley with representatives from a
17 number of leading technology companies?

18 A. Yes.

19 Q. Do you have any understanding of
20 what the nature of those meetings was?

21 A. No.

22 Q. Were you involved in the GEC in
23 this iteration prior to 2017?

24 A. No. I was on detail in the Office
25 of Policy Planning at this time.

1 **Q. But from the beginning, at least,**
2 **it appears there was some aspect of the GEC's**
3 **mission that involved interacting with social**
4 **media platforms?**

5 MR. KIRSCHNER: Objection, assuming
6 evidence. That's not in the record.

7 BY MR. SAUER:

8 **Q. Fair to say?**

9 A. I don't see a connection between
10 the meeting in Silicon Valley, here, and the
11 establishment of the Global Engagement Center.
12 I -- could you explain what the connection is?

13 **Q. Do you -- are you aware of any**
14 **connection --**

15 A. I'm not.

16 **Q. -- between the GEC and interactions**
17 **with social media platforms?**

18 A. I'm not aware of any connection
19 between the establishment of the Global
20 Engagement Center through the executive order or
21 the Global Engagement Center in its iteration
22 then, and then in the senior officials from the
23 White House meeting in Silicon Valley the Global
24 Engagement Center is not a part of the White
25 House.

1 BY MR. SAUER:

2 Q. And is this a report from USA Today
3 dated February 9th, 2018, discussing the Global
4 Engagement Center?

5 A. Yes.

6 Q. And you're quoted in this article,
7 aren't you, in there, in the second paragraph?

8 MR. KIRSCHNER: Objection. I would
9 like to have an opportunity to read this
10 article, as well, before -- before going forward
11 on this.

12 MR. SAUER: If you're going to read
13 the entirety of every document we're going to be
14 here a long time.

15 MR. KIRSCHNER: Just to be able to
16 put eyes on the document, just --

17 MR. SAUER: I tell you what, when I
18 get to a question that is of concern, and we
19 need some time, let me know. But --

20 MR. KIRSCHNER: You just give at
21 least the witness a little bit of time to
22 familiarize himself with the document?

23 BY MR. SAUER:

24 Q. Well, let me ask this: Do you
25 recall giving an interview to the USA Today in

1 **around February of 2018 or giving comments to**
2 **them?**

3 A. I -- I -- I don't recall it
4 specifically, but I gave -- I did a fair amount
5 of media engagement, so I -- I see the
6 interview, yes.

7 Q. And do you see there, on the second
8 paragraph of this, where it talks about how
9 there's an agreement to transfer 40 million
10 dollars from the Defense Department to more
11 fully fund the GEC?

12 A. Mm-hmm.

13 Q. You remember that incident, I'm
14 sure.

15 A. Yes.

16 Q. And do you remember talking to the
17 media about that?

18 A. I don't recall speaking to the
19 media specifically about the funding transfer.

20 Q. Two paragraphs down from that,
21 there's a reference to Stephen Goldstein, the
22 State Department Undersecretary for Public
23 Diplomacy, describing the Center's job; is that
24 fair to say?

25 A. Yes.

1 Q. Do you remember getting involved in
2 a conversation with reporters with
3 Mr. Goldstein?

4 A. I don't recall whether
5 Undersecretary Goldstein and I did a joint or
6 separate engagement with USA Today for this
7 interview.

8 Q. Okay. Can you turn to the next
9 page of this article.

10 A. Mm-hmm.

11 Q. Actually, turn in two pages, to the
12 third page of the document.

13 A. Okay.

14 Q. There is a freestanding paragraph
15 that begins: Some of that work has already
16 begun, Kimmage and Goldstein said; do you see
17 where it says that?

18 A. Yes.

19 Q. And then immediately below that,
20 there's a quote from Goldstein, that said: Top
21 managers have been working with other government
22 agency, the White House, and technology
23 companies, quote, encouraging them to help us in
24 this fight; correct?

25 A. That is Undersecretary Goldstein's

1 quote, correct.

2 Q. And do you remember him saying
3 that?

4 A. I -- I -- I don't. I don't know
5 whether I was there when he said that.

6 Q. Okay. And then it goes on to say
7 he, which I take it refers to Goldstein, met
8 with executives in Google, in January, and
9 Twitter in February, and plans to meet with
10 Facebook; correct?

11 A. Yes.

12 Q. And were you present at those
13 meetings?

14 A. I don't recall being present at
15 those meetings.

16 Q. Okay. And it goes on to say: They
17 discussed shutting down bots, thousands of
18 automated accounts that spew misleading
19 information; correct?

20 A. Yes.

21 Q. So that --

22 A. Correct.

23 Q. -- would be a discussion of taking
24 content down from a social media platform;
25 correct?

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1 A. Can I clarify? This is
2 Undersecretary Goldstein's engagement. I wasn't
3 present there. I can't speak to the content of
4 his engagement.

5 **Q. You don't remember whether or not**
6 **you were present for those meetings?**

7 A. I don't.

8 **Q. You don't recall?**

9 Do you recall having any specific
10 **recollection of what's discussed here?**

11 A. No.

12 **Q. Okay. And then he goes on to say**
13 **that he discussed with Google, Twitter, and**
14 **plans to discuss with Facebook to speed up the**
15 **removal of posts and videos that target US**
16 **audiences; correct?**

17 MR. KIRSCHNER: Objection, assumes
18 evidence not in the record. These are not
19 quotes. These are paraphrases.

20 BY MR. SAUER:

21 **Q. That's what the article reports him**
22 **as saying; correct?**

23 A. That's what the article reports him
24 as saying, correct.

25 **Q. Not with quotes around it, but as a**

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1 **summary; correct?**

2 A. Correct, as a summary.

3 **Q. Do you remember any conversations**
4 **from that timeframe where there was a discussion**
5 **of speeding up the removal of posts between**
6 **anyone associated with the State Department and**
7 **any social media platform?**

8 A. I don't recall any conversations
9 between myself, at the GEC, and social media
10 companies about speeding up the removal of
11 posts.

12 **Q. Do you recall anyone from the State**
13 **Department telling you that they had a**
14 **conversation with a social media platform about**
15 **speeding up the removal of posts?**

16 A. No. I recall Undersecretary
17 Goldstein engaging with the companies, and I
18 don't remember all of the details. I -- I -- I
19 don't remember what he said he discussed with
20 them.

21 **Q. Okay. And you -- you don't recall**
22 **whether you were personally present when those**
23 **meetings occurred?**

24 A. I don't believe I was, but I
25 don't -- I don't -- I don't recall being

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1 present, no.

2 Q. How about anyone else, other than
3 Secretary Goldstein, Undersecretary Goldstein,
4 have you ever had a discussion with anyone else
5 at the State Department that discussed, for
6 example, talking to social media platforms about
7 speeding up the removal of posts?

8 A. I don't recall any conversation
9 with others at the State Department about
10 specifically speeding up the removal of posts.

11 Q. How about any kind of removal of
12 posts, any discussion, other than the incident
13 you described earlier, obviously, in 2018?

14 A. Outside of the very specific
15 context of this is what I would describe as an
16 exceptional case involving a threat, I don't
17 recall specific discussions of meetings with
18 social media companies about speeding up the
19 removal of posts.

20 Q. How about making sure -- or how
21 about taking steps to stop bots from -- from
22 spreading disinformation?

23 A. I don't recall conversations about
24 taking steps. We would talk about foreign
25 actors use of things like bots, but not to

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1 encourage some type of action, it would be
2 really for a -- to inform. So I don't recall
3 conversations about taking steps.

4 Q. Would you -- do you recall
5 conversations about informing social media
6 companies that bots are spreading a certain kind
7 of disinformation or narrative?

8 A. I do recall conversations about
9 Chinese use of bots to spread propaganda
10 narratives.

11 Q. Do you know whether the use of bots
12 would violate the social media platforms content
13 violations policies?

14 A. I don't know, no.

15 Q. Are you aware of anyone at the
16 State Department, including the GEC, going
17 through intermediaries to indirectly flag or
18 raise content concerns with social media
19 platforms?

20 A. Could -- could you clarify?

21 Q. Well, are you aware of any instance
22 where someone at a social media platform -- or
23 sorry -- someone at the GEC may have gone to
24 some third party on the understanding that that
25 third party might convey a concern about content

1 **on the social media platform to the social media**
2 **platform?**

3 A. I -- no, I can't speak to every
4 engagement that someone at the State Department
5 might have had.

6 **Q. Are you aware of any engagements of**
7 **that nature that I described?**

8 A. No, not that I can think of.

9 MR. SAUER: Can you get C?

10 Let's call this Exhibit 3.

11 (Exhibit No. 3 was marked for
12 identification.)

13 MR. KIRSCHNER: Mr. Sauer, so to
14 clarify the record, now -- never mind. I see
15 you're -- are you identifying this as USA Today,
16 as the -- the URL is not USA Today, so both for
17 Exhibit 2 and assume you'll also mention for
18 Exhibit 3, is it because there's a USA Today in
19 parenthetical next to the author? I just want
20 to make sure I understand.

21 MR. SAUER: Yeah, that's all I'm
22 referring to.

23 MR. KIRSCHNER: Okay.

24 BY MR. SAUER:

25 **Q. Then can you take a quick look at**

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1 this article by Oren Dorell, who is indicated in
2 parentheses as from USA Today?

3 A. Mm-hmm.

4 Q. And is this one dated September --
5 sorry -- February 13th, 2018, so just a few days
6 after Exhibit 2?

7 A. Yes.

8 Q. Does this article, if you turn to
9 page 2, also refer to you and quote you?

10 A. Yes, I see my name.

11 Q. Yeah, and in the middle of the
12 second page, you see where you're quoted as
13 saying: We're now a coordinating body and
14 incubator of ideas; right?

15 A. Yes.

16 Q. Okay. And then below that it says:
17 How does the Center do that? And then it says:
18 The Center's 66 employees coordinate with US
19 agencies, such as the FBI and the Department of
20 Homeland Security, to target the American
21 audience; correct?

22 A. Yes, that's what this says.

23 Q. Is that a fair description of -- of
24 what you told them at the time, do you think?

25 A. No, it's not.

1 Q. Why -- what's unfair about that?

2 A. The Global Engagement Center does
3 not target American audiences.

4 Q. Okay. How does it coordinate with
5 US agencies at FBI and the Department of
6 Homeland Security?

7 A. It meets with them periodically.

8 Q. How often do those meetings occur?

9 A. At the senior level, every few
10 months, I would say.

11 Q. And then at what other levels?

12 A. At the working level, you would
13 have regular engagement through the National
14 Security Council on a much more frequent basis,
15 because you would have officials from all
16 agencies there. But maybe every few weeks at
17 the working level.

18 Q. So every few weeks, under the aegis
19 of the National Security Agency, there would be
20 coordination between the GEC, the FBI, and
21 the -- and the DHS; correct?

22 A. No.

23 MR. KIRSCHNER: Objection. I was
24 going to say, mischaracterizes the evidence.

25 A. No. You said National Security

1 Agency, that's a component of the intelligence
2 community.

3 The meetings I would refer to would
4 be through the National Security Council.

5 **Q. I got you.**

6 A. Which periodically convene all the
7 agencies within the National Security Complex.

8 **Q. Are there any other forms of direct**
9 **coordination between the FBI and DHS and GEC?**

10 A. Yes. There are periodic meetings
11 and there are interagency forums where
12 representatives of those agencies would be
13 present.

14 **Q. How often do those occur?**

15 A. Every few weeks or months.

16 **Q. And who -- who -- not -- I don't**
17 **want their names, but what sort of personnel**
18 **from the GEC are participating in these**
19 **meetings?**

20 A. Clarification, could you clarify,
21 at the senior level or the working level?

22 **Q. Well, why don't we start with the**
23 **senior level. Who at the senior level, you**
24 **know, by title, would be participating in those**
25 **kinds of meetings with the FBI and DHS, outside**

1 **the aegis of the NEC and meetings you referred**
2 **to earlier.**

3 A. At the senior level it would be the
4 coordinator, either acting or appointed, and
5 potentially the principal deputy coordinator.
6 Those would be the senior-level meetings. And
7 at the working level, probably a team director
8 from the Global Engagement Center.

9 **Q. Which team would typically do that?**
10 **Would that be the TET or the I2C2 or who would**
11 **be doing that?**

12 A. It would be entirely dependent on
13 the focus of the meeting. If a meeting is
14 focused on Russia, it would be the Russia team.
15 Generally, it would be threat-actor focused.

16 **Q. Threat-actor focused?**

17 A. Threat-actor focused, so Russia,
18 China, counterterrorism.

19 **Q. If you turn back to that article --**
20 **let me ask this: Those meetings you described,**
21 **are they on an as-needed basis or is there a**
22 **kind of standing or recurring meeting between**
23 **GEC and FBI and DHS?**

24 MR. KIRSCHNER: Objection, vague.

25 A. I -- I don't recall any standing

1 meeting with FBI. There were standing internal
2 forums, where both GEC and potentially FBI or
3 DHS would be there, but it wasn't a specific
4 meeting for the GEC and that agency to
5 coordinate. They would be there as part of a
6 larger group.

7 **Q. Okay. What -- what sorts of**
8 **discussions would they have at a meeting like**
9 **that? You know, can you characterize the sorts**
10 **of discussions that would occur in those kinds**
11 **of meetings?**

12 A. I would describe them as
13 threat-actor focused. So it would be the
14 actions of a specific foreign threat actor and
15 then the coordination of what the interagency
16 would do in response.

17 **Q. And would -- would content on**
18 **social media platforms be discussed at those**
19 **meetings as part of a threat-actor focus?**

20 A. Generally, the focus would be on
21 the threat actor, potentially with mention of
22 social media. Outside of a specific threat you
23 would generally not focus on content, specific
24 pieces of content, with the exception of, for
25 example in counterterrorism, something that

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1 would be threat related.

2 Q. How about these narratives, for
3 example, you said there might be a Russia
4 meeting where that involves the GEC and the FBI
5 and DHS, or a China-focused meeting, suppose
6 Russia and malign actors are pushing narratives
7 on social media, would that be discussed at
8 these meetings?

9 MR. KIRSCHNER: Objection,
10 speculative, and calling for a hypothetical.

11 BY MR. SAUER:

12 Q. If you know?

13 A. Are you asking about a specific
14 meeting?

15 Q. Well, more generally, is that
16 something that has come up from time to time, to
17 your knowledge?

18 A. Russian narratives would come up in
19 the context of a meeting.

20 Q. And would those be -- are there
21 scenarios where GEC actors are briefing the FBI
22 and DHS on Russian narratives?

23 A. I don't know that the GEC would be
24 the lead briefer. It would really depend on the
25 meeting and the context. You might have the

1 intelligence community, for example, lead with a
2 briefing.

3 There are subject matter experts at
4 the GEC who can speak to that. I can't say who
5 briefed what at a -- at a specific meeting.

6 **Q. But you -- you're aware, at least,**
7 **that narratives from threat actors on social**
8 **media have been discussed at those meetings?**

9 MR. KIRSCHNER: Objection, assuming
10 evidence not in the record.

11 A. Yes, it's part of the GEC's
12 congressional mandate to identify the propaganda
13 and disinformation of malign foreign actors and
14 a significant amount of that is structured
15 around narratives, yes.

16 **Q. Okay. So -- so it would be -- it**
17 **would be, I take it, sort of routine practice**
18 **for GEC staff to brief the FBI about a malign**
19 **foreign narrative or brief DHS about a malign**
20 **foreign narrative that they've identified?**

21 MR. KIRSCHNER: Objection, assumes
22 evidence not in the record.

23 BY MR. SAUER:

24 **Q. Go ahead.**

25 A. No, I don't recall it being routine

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1 practice. The GEC met infrequently with the
2 FBI. I don't recall any specific meetings with
3 the FBI. They would be present at interagency
4 forums, but there were no specific meetings I
5 can recall where the GEC would meet with the FBI
6 to brief them on narratives.

7 **Q. How about DHS, did the GEC meet**
8 **with DHS to -- and at least as part of that**
9 **meeting inform them about malign foreign**
10 **narratives?**

11 A. So there were meetings with DHS at
12 the senior level. I don't recall whether
13 narratives were discussed. I don't believe that
14 narratives would have been a focus for the
15 meetings with DHS.

16 **Q. Who is at these meetings at the**
17 **senior level, on your side?**

18 A. I recall meetings with DHS with the
19 appointed coordinator, where I was present in my
20 role as the principal deputy.

21 **Q. Who else on the GEC side?**

22 A. On the GEC side, you would have one
23 or potentially two of the other deputies, the
24 team chiefs, and then maybe some individuals
25 from the -- what we call the threat team, so the

1 China or the Russia team, with relevant subject
2 matter expertise.

3 **Q. And who would participate on the**
4 **DHS side?**

5 A. On the DHS side, it would be the --
6 the principal, and then -- I don't recall the
7 people on the DHS side. I believe -- yeah --

8 **Q. What does that mean, the principal?**

9 A. The principal is the highest level
10 official involved in the meeting.

11 **Q. So who would -- what would the**
12 **title of that person be at these meetings?**

13 A. I -- I believe it would -- I'm -- I
14 don't recall whether we had a meeting with the
15 undersecretary for CISA, the -- the center
16 for -- the Cyber and Infrastructure Security
17 Agency, or whether it was the official below
18 that.

19 There's also a team at DHS that
20 deals with disinformation. So I don't -- it
21 would have been either the undersecretary or
22 someone more junior --

23 **Q. Okay.**

24 A. -- who was a principal for DHS.

25 **Q. I'm sorry, finish.**

1 A. So it would be either the
2 undersecretary or the people below that. I -- I
3 believe there was at least one meeting involving
4 the GEC coordinator and the DHS undersecretary.

5 **Q. And when you said undersecretary,**
6 **and you referred to CISA?**

7 A. Right.

8 **Q. So for clarity of the record, CISA**
9 **is the Cyber Security and Infrastructure**
10 **Security Agency within DHS; correct?**

11 A. Yes. Yes.

12 **Q. And the person you described as the**
13 **undersecretary, is that the director of CISA?**

14 A. Yes.

15 **Q. Okay. And who was that person who**
16 **was at the meetings, was that Director Krebs or**
17 **Director Easterly?**

18 A. It would have been Director Krebs
19 in the period, that I recall.

20 **Q. Okay. Do you know how many**
21 **meetings there were at the**
22 **director-to-coordinator level with CISA?**

23 A. I believe there was at least one.

24 **Q. Do you know if there were more than**
25 **one?**

1 A. I -- I -- I don't recall. There
2 may have been. I don't recall.

3 **Q. What would the timeframe of these**
4 **meetings have been?**

5 A. It would have been between 2019 and
6 2021.

7 **Q. So at some point you had one or**
8 **more meetings in a three-year period?**

9 A. I -- I -- I --

10 **Q. You had at least one, but maybe**
11 **more meetings with the CISA director sometime in**
12 **2019, 2020 or 2021?**

13 A. Yeah, there were one or more
14 meetings during the two-year period when the GEC
15 had an appointed coordinator.

16 **Q. When was that?**

17 A. That would have been between
18 February 2019 and February 2021, so that
19 two-year period.

20 **Q. Okay. Do you remember anywhere**
21 **within that two-year range when that meeting**
22 **occurred?**

23 A. I believe it was 2020, but I'm --
24 I -- I -- I don't remember.

25 **Q. Do you recall what, generally, was**

1 **discussed at that meeting?**

2 A. I don't recall the full agenda.

3 The primary purpose was information
4 sharing and update on the GEC, what is the GEC
5 focused on, what is it doing, what are its major
6 activities.

7 And then I don't recall what the --
8 the CISA part of the agenda was, but the -- I
9 would describe the primary focus as information
10 sharing.

11 **Q. When you say information sharing,**
12 **were you trying to set up or establish a**
13 **coordination or communicating relationship**
14 **between the two agencies, GEC and CISA?**

15 A. Could you clarify what you mean by
16 coordinating or communicating relationship?

17 **Q. Well, let me rephrase that**
18 **question.**

19 **In that meeting, did you propose**
20 **ongoing communication or coordination between**
21 **GEC and CISA?**

22 MR. KIRSCHNER: Objection to the
23 extent that this calls for privilege
24 information, that's deliberative, I would
25 instruct the witness not to answer. To the

1 extent you can answer the question without
2 revealing privileged information, you can go for
3 it.

4 A. The GEC's congressional mandate
5 strongly encourages ongoing communication with
6 all of the agencies that are engaged on
7 propaganda and disinformation by foreign actors.

8 **Q. Is there -- is there ongoing**
9 **communication between the GEC and CISA?**

10 A. I don't know, now. There were
11 periodic meetings, they were not very frequent.
12 But how would you define ongoing?

13 **Q. Well, you used the word, how would**
14 **you define it? You referred to on -- you said**
15 **your statutory mandate requires ongoing**
16 **communication, and I asked whether there is**
17 **ongoing communication with CISA.**

18 **Can you describe what kind of**
19 **communication with CISA occurred during the**
20 **period of your knowledge, that five-year period**
21 **when you were acting coordinator?**

22 A. So I was acting coordinator for two
23 years, and then I was the principal deputy for
24 two. And there were -- there was at least one
25 senior-level and potentially more senior-level

1 engagements every few months, I would say.

2 **Q. When you say more senior-level**
3 **engagements every few months, who would have**
4 **participated in those?**

5 A. The senior-level engagements, as I
6 said, would involve the coordinator, the acting
7 coordinator, the appointed coordinator, and the
8 principal deputy, those are the senior-level
9 engagements.

10 **Q. Okay. So senior-level engagements**
11 **would include you --**

12 A. Yes.

13 **Q. -- and then the CISA director;**
14 **correct?**

15 A. Yes.

16 **Q. And you said those engagements**
17 **would occur every few months?**

18 MR. KIRSCHNER: Objection, assuming
19 evidence not in the record, and
20 mischaracterizing his testimony?

21 BY MR. SAUER:

22 **Q. Is that correct, those would occur**
23 **every few months?**

24 A. Every few months, I know we had at
25 least one meeting, and there were at -- there

1 may have been two, so every few months, yeah.

2 Q. One meeting or two over a four-year
3 period or every few months, those seem different
4 to me, can you clarify?

5 A. Sure. I think the aim was to meet
6 every few months. I don't know that we achieved
7 that.

8 Q. How about at the staff level,
9 below, you're -- I think we've been talking
10 about the principal level --

11 A. Yeah.

12 Q. -- in these interactions between
13 GEC and CISA, how about at the staff level?

14 A. At the staff level, outside of the
15 NSC process, I -- I don't recall how frequently
16 GEC representatives met with the -- the
17 disinformation office within CISA.

18 Q. When you say the disinformation
19 office within CISA, is that the team that's been
20 described as the mis-dis- and mal information
21 team?

22 A. I believe that's the current name
23 for it, yes.

24 Q. And did it previously have a name
25 that was something like the countering -- in any

1 event, so when you're talking --

2 A. Right.

3 Q. -- about this -- earlier, when you
4 referred to how there was a meeting with either
5 the director or the director of the
6 misinformation group --

7 A. Mm-hmm.

8 Q. -- that's a reference to what
9 became -- came to be known and still is known as
10 the mis-dis- and mal information team; correct?

11 A. Yes. Yes.

12 Q. Who was the director or who was the
13 head of that group?

14 A. I don't recall.

15 Q. Were there ongoing interactions
16 between GEC staff and -- in that mis-dis- and
17 mal information team?

18 MR. KIRSCHNER: Objection,
19 speculative.

20 A. I believe there were interactions.
21 I don't recall how frequent they were or how
22 ongoing.

23 Q. Do you know what was discussed in
24 those interactions, generally?

25 A. Specifically, no, generally,

1 information sharing.

2 Q. Okay. What kind of information was
3 shared?

4 A. The actions of the major malign
5 foreign propaganda and disinformation actors
6 as -- as -- as part of the GEC's mandate.

7 Q. So it would be discussions of
8 the -- you know, sorts of narratives that are
9 being pushed by malign foreign actors?

10 MR. KIRSCHNER: Objection, assumes
11 evidence not in the record.

12 BY MR. SAUER:

13 Q. Is that fair to say?

14 A. It could be anything from the plans
15 of those actors to the activities. I can't
16 speak to the nature of the discussions. I
17 wasn't part of them.

18 Q. Okay. Do you know who participated
19 in those on the GEC side?

20 A. No, I don't. I don't.

21 Q. Can you stick with Exhibit 3,
22 there, right in that same middle of the second
23 page, we talked about how the center's 66
24 employees coordinate with US agencies, such as
25 the FBI and the Department of Homeland Security;

1 correct?

2 A. Yes, that's what the paragraph
3 says.

4 Q. And then the -- the news article
5 goes on to say: To target the American
6 audience; correct?

7 A. Yes, that's what the news article
8 says.

9 Q. And you -- you don't think that's a
10 fair characterization of what you would have
11 said to them at the time?

12 A. No. That's an inaccurate
13 characterization of the GEC's mission and focus.

14 Q. Does the GEC's mission and focus
15 include concern about foreign narratives that
16 are pushed on social media that get replicated
17 by domestic speakers?

18 So suppose, for example, Russia is
19 pushing the narrative that the US government
20 invented the AIDS virus in a lab in 1970, and
21 they pushed that out through media or social
22 media, and it gets re-tweeted by, you know,
23 domestic actors, is that a point of concern for
24 the GEC?

25 MR. KIRSCHNER: Objection, calls

1 for a hypothetical.

2 BY MR. SAUER:

3 Q. If you know.

4 A. The GEC's concern is with the
5 actions of foreign propaganda actors. The GEC's
6 concern stops there. It doesn't extend to the
7 speech of Americans.

8 Q. Okay. So if American -- like,
9 Americans pick up, for example, a malign foreign
10 narrative, is that something that you would --
11 the GEC would track?

12 MR. KIRSCHNER: Objection.

13 BY MR. SAUER:

14 Q. That, oh, this is getting traction
15 in the -- you know, in the American social media
16 sphere?

17 MR. KIRSCHNER: Objection,
18 speculative, hypothetical.

19 A. No. The GEC does not track the
20 American social media sphere.

21 Q. Okay. So you don't pay attention
22 to what's being said on Facebook and Twitter and
23 whether or not they are -- whether or not these
24 malign foreign narratives are kind of spilling
25 over into what Americans are saying on Facebook

1 **and Twitter and YouTube and so forth?**

2 MR. KIRSCHNER: Objection,

3 ambiguous.

4 BY MR. SAUER:

5 **Q. If you -- is that correct?**

6 A. No. The GEC's focus is on foreign
7 propaganda and disinformation.

8 **Q. Would the GEC ever discuss with**
9 **social media platforms in these various**
10 **interactions issues about whether or not malign**
11 **foreign narratives have been replicated in**
12 **domestic speech?**

13 A. No. That would not be the GEC's
14 focus. I can't speak to what the social media
15 companies may raise or how they raise it, but
16 that would not be the GEC's focus.

17 **Q. How about CISA, is that something**
18 **that CISA might focus on, to your knowledge?**

19 A. I can't speculate about CISA's
20 focus.

21 **Q. CISA is C-I-S-A; correct?**

22 **Do you know what CISA's mission is?**

23 A. It's -- I assume it's listed on
24 their website. I'm not going to try to
25 reproduce it.

1 Q. I'm just asking if you know. Do
2 you have a general understanding of what they're
3 concerned with?

4 A. It's primarily cyber security
5 focused.

6 Q. And how about the mis-dis- and mal
7 information team, do you know what their focus
8 is?

9 MR. KIRSCHNER: Objection,
10 speculative.

11 BY MR. SAUER:

12 Q. If you know.

13 A. I don't recall their precise
14 mission within -- within CISA. It was a small
15 team.

16 Q. How about more generally, do you
17 have a general understanding of what that team
18 focuses on?

19 MR. KIRSCHNER: Objection,
20 speculative.

21 BY MR. SAUER:

22 Q. If you know.

23 A. Disinformation and misinformation
24 as it pertains to cyber and infrastructure
25 security.

1 Q. And does that include
2 misinformation and disinformation that come from
3 domestic actors?

4 MR. KIRSCHNER: Objection,
5 speculative.

6 A. I don't know.

7 Q. So you don't know whether the
8 mis-dis- and mal information team focuses
9 exclusively on foreign disinformation or whether
10 its concern with disinformation extends to sort
11 of disinformation propagated by domestic
12 speakers?

13 A. I'm not going to speculate about
14 the focus of a team at another agency.

15 Q. I'm not asking you to speculate.
16 I'm just asking you to answer if you know. What
17 do you know?

18 A. I don't recall what their specific
19 focus was within the CISA mandate.

20 Q. Same paragraph there in paragraph
21 three, under: How does the center do that.

22 A. Mm-hmm.

23 Q. The next sentence goes on to say
24 that it, meaning the GEC, works with social
25 media companies that have been used to spread

1 **those meetings nowadays?**

2 A. No.

3 **Q. Do you know who attended meetings**
4 **like that during 2021, meetings between social**
5 **media platforms and GEC personnel?**

6 A. So the senior-level meetings would
7 have involved me and one or more of the deputy
8 coordinators, the chiefs of the relevant teams,
9 and then working-level people with relevant
10 subject matter expertise.

11 **Q. And I think you may have talked**
12 **about this earlier, but how often would those**
13 **meetings occur in 2021, specifically?**

14 A. I believe with the aim was for
15 quarterly meetings. I don't know that they
16 always happened on a quarterly basis.

17 **Q. And what social media platforms**
18 **were met with?**

19 A. I believe we had meetings with
20 Twitter and maybe Facebook or Google.

21 **Q. How about YouTube. Google is -- I**
22 **think owns YouTube. Was that a YouTube-related**
23 **meeting?**

24 A. I don't -- I don't recall.

25 **Q. How about Parler?**

1 A. I don't recall meeting with Parler.
2 I don't believe we met with them.

3 **Q. How about LinkedIn?**

4 A. I don't recall a meeting with
5 LinkedIn.

6 **Q. How are these meetings done, is it**
7 **all on a big Zoom call, or do you guys fly to**
8 **San Francisco or do you meet with their -- you**
9 **know, their -- their D.C. people, like, who --**
10 **who -- where do they occur?**

11 A. Sure. Before COVID the meetings
12 would be generally at the GEC offices in
13 Washington, D.C.; in 2021, it would have been
14 over Zoom or a virtual platform.

15 **Q. Okay. And would there be, for**
16 **example, would there be, you know, on people's**
17 **calendars electronic invites to those Zoom**
18 **meetings?**

19 A. I believe so, yes.

20 **Q. Would that include your calendar?**

21 A. Yes.

22 **Q. Okay. So if you were to look at**
23 **your calendar for 2021, you could probably**
24 **figure out which social media platforms you met**
25 **with and how often; fair to say?**

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1 MR. KIRSCHNER: Objection,
2 mischaracterizes evidence, assumes evidence not
3 in the record.

4 A. Yes.

5 Q. Okay. So you said, like, for
6 example, in the 2021 timeframe the goal was to
7 meet with them quarterly, and you can't remember
8 whether or not you met that goal; correct?

9 A. Yeah, yeah, I don't -- I don't
10 remember whether we ever had a recurring
11 quarterly meeting on the calendar.

12 Q. And that you believe you met with
13 Twitter and Facebook; correct?

14 A. Yes.

15 Q. Possibly met with YouTube and,
16 slash, Google?

17 A. Possibly.

18 Q. Do you remember any other social
19 media platforms that you've ever met with?

20 A. In 2021?

21 Q. Well, we'll start with 2021, yeah.

22 A. No, I -- I -- I recall meeting with
23 Twitter.

24 Q. Mm-hmm.

25 A. And possibly with the other

1 companies you mentioned. I do not recall any
2 other meetings with -- with big social media
3 companies.

4 **Q. How about little social media**
5 **companies?**

6 A. With social media companies.

7 **Q. How about others at -- at -- others**
8 **at the GEC, are you aware of them meeting with**
9 **social media companies?**

10 A. No. It wouldn't -- normally they
11 wouldn't share every single meeting with me.

12 **Q. Okay. Are you generally aware that**
13 **such meetings occurred, that you were not**
14 **participating in, during the 2021 timeframe?**

15 A. Yes.

16 **Q. Okay. Who would have participated**
17 **in meeting with social media companies then?**

18 A. Representatives of the Technology
19 Engagement Team, and then relevant members of
20 what we call the threat team, so the Russia
21 China, Iran, or counterterrorism teams.

22 **Q. Do you know what social media**
23 **companies were met with?**

24 A. No.

25 **Q. And do you know what kind of**

1 **threats were discussed?**

2 A. The -- I -- I don't know the
3 specific threats that were discussed, no.

4 **Q. Starting with focusing on your**
5 **meetings --**

6 A. Mm-hmm.

7 **Q. -- at any of your meetings, where**
8 **it was foreign generated election-related**
9 **disinformation discussed with social media**
10 **platforms?**

11 A. I don't recall any discussion of
12 election-related threats in my 2021 meetings.

13 **Q. How about in earlier meetings, how**
14 **about in 2019, 2020, at any time did you have a**
15 **meeting with the social media platform where**
16 **election-related disinformation was discussed?**

17 A. I don't recall a meeting focused on
18 election-related disinformation or propaganda.
19 The companies may have briefed on some of the
20 steps they were taking. They spoke about this
21 publicly, as well. But I don't recall the GEC
22 introducing anything election-related.

23 **Q. What do the companies say about**
24 **election-related disinformation?**

25 A. I don't recall the specifics, just

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1 that they were focused on it and taking steps.

2 Q. Did they tell what steps they were
3 taking?

4 A. I don't recall the specifics.

5 Q. Did those steps that they were
6 taking include steps relating to content
7 modulation?

8 A. Not that I recall. I believe it
9 would have been more along the lines of -- I
10 believe there was media coverage of, like, a war
11 room or -- or things like that.

12 MR. KIRSCHNER: Mr. Sauer, just in
13 terms of timing, what do you think? We've been
14 going for about an hour.

15 MR. SAUER: I'm fine with a short
16 break now. Let's keep it real short. Are you
17 guys okay with that?

18 MR. KIRSCHNER: Yeah.

19 MR. SAUER: Let's go off the
20 record.

21 MR. KIRSCHNER: Do a five-minute
22 break.

23 THE WITNESS: Okay.

24 THE VIDEOGRAPHER: Just one second.

25 MR. KIRSCHNER: Then we'll go for

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1 another 45 minutes or an hour.

2 MR. SAUER: Let's hold it for five
3 minutes.

4 MR. KIRSCHNER: Yeah, okay.

5 MR. SAUER: Are we off the record?

6 THE VIDEOGRAPHER: The time is
7 11:10 a.m. We're off the record.

8 (Recess.)

9 THE VIDEOGRAPHER: The time is
10 11:21 a.m. We are back on the record. Please
11 proceed.

12 BY MR. SAUER:

13 Q. Mr. Kimmage, who is Alexis Frisbee?

14 A. Alexis Frisbee is a member of the
15 Technology Engagement Team the Global Engagement
16 Center.

17 Q. That's the TET, as we've called it?

18 A. Yes.

19 Q. At what -- what's her -- what's her
20 title within that team?

21 A. I don't recall her title.

22 Q. Is she the head of the team or is
23 she a member of the team?

24 A. No. She's not the head of the
25 team. She's a member of the team.

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1 Q. Are you aware of her communicating
2 with social media platforms?

3 A. I believe she helped to set up
4 meetings, yes.

5 Q. Okay. And did she have
6 communications with them or did she just set up
7 the meetings?

8 A. The communication I'm aware of
9 would be in the context of setting up a meeting.

10 Q. So you're aware that she set up a
11 meeting with what social media platform?

12 A. I don't recall.

13 Q. Was it more than one?

14 A. I -- I don't recall.

15 Q. What was the timeframe of that,
16 setting up that meeting?

17 A. I believe it would have been 2021.

18 Q. Do you know whether she
19 participated in the meetings that she set up?

20 A. I -- I don't recall.

21 Q. Who -- who would have participated
22 in the meetings that she set up or who did
23 participate in the meeting or meetings that she
24 set up?

25 A. Sure. In the -- we've already been

1 through this, I believe, the acting coordinator,
2 one or more of the deputies, the team chiefs
3 from some of the threat teams, and then some
4 working-level staff with relevant subject matter
5 expertise.

6 **Q. So did she set up all of the**
7 **meetings that you described as aspire to be**
8 **quarterly in 2021 or did she set up one**
9 **particular one?**

10 A. I -- I -- I don't know. The -- the
11 coordinator doesn't normally know who sets up
12 the meetings.

13 **Q. How do you know she set up that one**
14 **or more?**

15 MR. KIRSCHNER: Objection, assuming
16 evidence not in record.

17 BY MR. SAUER:

18 **Q. If you know?**

19 A. I believe she -- she -- she helped
20 to set up at least one meeting.

21 **Q. What makes you think that? What do**
22 **you remember about that?**

23 A. She was on the Technology
24 Engagement Team.

25 **Q. Do you remember any specific issue**

1 **that -- that was discussed in the meeting she**
2 **set up?**

3 A. The -- the agenda, you know, we --
4 we went over would have been an update on what
5 the Global Engagement Center is seeing in the
6 environment, some of the potentially relevant
7 analysis that the Global Engagement Center would
8 be engaged in, and then information sharing with
9 whatever the social media company wanted to
10 share.

11 **Q. Do you know if this was a**
12 **Russia-specific meeting or a China-specific**
13 **meeting or an Isis-specific meeting?**

14 A. I don't recall the 2021 meetings as
15 being focused on a specific threat actor.

16 **Q. What were they more focused on?**

17 A. I believe it would have been across
18 the board, so here's what China is potentially
19 up to, here's what Russian propaganda
20 disinformation is, I don't recall the specific
21 agenda, but I don't believe it was limited to a
22 single threat actor.

23 **Q. Okay. Were there other threat**
24 **actors that were discussed in those 2021**
25 **meetings, besides, I think you mentioned, Russia**

1 **and China?**

2 A. Potentially, I just don't recall
3 the specific agenda.

4 **Q. Do you recall election-related**
5 **issues being discussed in any of those meetings?**

6 A. Could you --

7 MR. KIRSCHNER: Objection. I'm
8 sorry, I was going to say, objection, vague.

9 A. Could you clarify what you mean be
10 election-related.

11 **Q. Well, do you remember the word**
12 **election coming up? And by election I mean an**
13 **American election.**

14 A. Right.

15 **Q. So I'm not asking about**
16 **disinformation that relates to an election**
17 **conducted in what passes for elections in some**
18 **of these threat actor states, but was there any**
19 **discussion that related to an American election**
20 **or elections?**

21 A. I don't recall any discussions in
22 American elections in my 2021 meetings with
23 social media companies.

24 **Q. How about discussion of mis- or**
25 **disinformation that relates to American**

1 **electoral processes or American elections?**

2 A. I don't recall any discussion
3 related to American elections in my 2021
4 meetings.

5 **Q. Who is Samaruddin K. Stewart, also**
6 **known as Sam Stewart?**

7 A. Sam Stewart was also a member of
8 the Technology Engagement Team.

9 **Q. What was his role on that team?**

10 A. His role was to facilitate
11 engagement with social media companies.

12 **Q. When was he -- when did he work for**
13 **the GEC?**

14 A. I don't recall the specific dates
15 of his employment.

16 **Q. Is he still there?**

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

18 **Q. Do you know when he left?**

19 A. No.

20 **Q. Do you know what timeframe he**
21 **worked, would it have been back in the 2017/2018**
22 **timeframe, 2019/2020?**

23 A. I believe it was later, sort of
24 2019 to 2021.

25 **Q. Okay. And do you know what,**

1 **exactly, he did for the TET?**

2 A. He helped to set up meetings and
3 establish contact with social media companies
4 and technology companies.

5 **Q. How did he do that?**

6 MR. KIRSCHNER: Objection,
7 speculative.

8 A. E-mails, meetings, phone calls.

9 **Q. Okay. Where was he based?**

10 A. I believe he was based in
11 Washington, D.C., and -- and potentially
12 elsewhere. I don't recall exactly where he was
13 based. This overlaps with the COVID period, and
14 I don't -- I don't recall.

15 **Q. Do you -- were you included in any**
16 **of the e-mails, meetings, and phone calls he had**
17 **with social media platforms?**

18 MR. KIRSCHNER: Objection,
19 speculative.

20 A. I don't recall any specific
21 e-mails. I may have been included on the
22 scheduling e-mail, but I don't recall any
23 specific e-mails.

24 MR. SAUER: Okay. Can I have G as
25 in goat.

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1 And we're going to hand you a
2 document that's going to be labeled Exhibit 4.

3 (Exhibit No. 4 was marked for
4 identification.)

5 THE WITNESS: Okay.

6 BY MR. SAUER:

7 **Q. And is this a media report by**
8 **Robert K. Ackerman, dated September 4th, 2020?**

9 MR. KIRSCHNER: Objection, assumes
10 evidence not in the record, speculative.

11 A. Yes.

12 **Q. And if you look in the second page**
13 **there, there's a reference to Lea Gabrielle; do**
14 **you see that?**

15 MR. KIRSCHNER: I would just ask, I
16 don't want to stay here for an hour reading
17 documents, but can we give the witness a couple
18 minutes to familiarize himself with the document
19 before proceeding with questions?

20 MR. SAUER: Sure. If he needs time
21 he can ask for it.

22 BY MR. SAUER:

23 **Q. Do you see a reference to Lea**
24 **Gabrielle?**

25 MR. KIRSCHNER: Well, he -- he

1 hasn't looked up. He's still looking at the
2 documented. Can you ask the witness if he's
3 ready to answer questions about the document
4 when he has an opportunity to look at it first?

5 BY MR. SAUER:

6 Q. Do you know who Lea Gabrielle is?

7 A. Yes.

8 Q. And who is she?

9 A. She was the appointed coordinator
10 of the Global Engagement Center from February
11 2019 to February 2021.

12 Q. So is she a -- I take it you
13 reported directly to her; right?

14 A. Yes.

15 Q. And you were the principal deputy
16 coordinator?

17 A. Yes.

18 Q. So you worked closely with her
19 during that time period?

20 A. Yes.

21 Q. If you flip to the second page, can
22 you go down to the -- it's basically the third
23 full paragraph from the bottom, there's a
24 paragraph that begins with: These three
25 adversaries?

1 MR. KIRSCHNER: Objection. The
2 witness still hasn't identified whether he's
3 ready to proceed with the questions. I would
4 please ask counsel to give an opportunity for
5 the witness to be able to familiarize himself
6 with the document before proceeding with
7 questions.

8 MR. SAUER: He hasn't asked me for
9 more time.

10 BY MR. SAUER:

11 Q. But do you see the paragraph I'm
12 referring to? That's my only question.

13 A. Yes.

14 Q. Okay. And do you see in the second
15 sentence of that paragraph, in the first
16 sentence it refers to Gabrielle's nightmare
17 scenario is propaganda that can lead to, among
18 other things, public health problems; right?

19 A. Yes.

20 Q. And then, in the third sentence, it
21 says: The GEC is countering disinformation on
22 the spread of COVID-19; correct?

23 A. Yes.

24 Q. What steps did the GEC take to
25 counter the spread of disinformation on the

1 **spread of COVID-19 --**

2 MR. KIRSCHNER: Objection, assumes
3 evidence not in the record.

4 BY MR. SAUER:

5 **Q. -- if any.**

6 A. So the GEC tracked propaganda and
7 disinformation by foreign actors, such as Russia
8 and China, that was related to the pandemic.
9 And the GEC worked with partners to counter the
10 effects of that abroad, outside the United
11 States.

12 **Q. Okay. What were -- what were**
13 **the -- what was the nature of COVID-related**
14 **disinformation that originated from, like,**
15 **Russia and China?**

16 A. The nature of it would have been
17 false narratives about the origins of the
18 pandemic, for example, blaming the United States
19 or implicating the US government.

20 Some of it would have been related
21 to the efficacy of, for example, vaccines that
22 the Russian government was developing.

23 And the modes of dissemination
24 would have been various. They could involve
25 bots, they could involve official media. There

1 was a whole ecosystem of, for example, Russia
2 propaganda, Russian propaganda actors.

3 **Q. Tell me about that ecosystem of**
4 **Russia. You mentioned China and Russia, so**
5 **let's start with Russia. You said Russia had**
6 **misinformation or disinformation about the**
7 **efficacy of vaccines. What was the nature of**
8 **that disinformation?**

9 A. The nature of the disinformation
10 would have been to denigrate the effectiveness
11 of western-developed vaccines and to promote the
12 effectiveness of Russian-developed vaccines.

13 **Q. Okay. And how is that propa- --**
14 **those kinds of narratives promulgated?**

15 A. The --

16 MR. KIRSCHNER: I was going to say,
17 objection, mischaracterizes evidence, and also
18 assumes evidence not in the record.

19 A. They would utilize the standard
20 toolbox of Russian propaganda and disinformation
21 efforts. So everything from official statements
22 by senior Russian officials to Russian
23 state-funded or controlled media outlets,
24 proxies, online tools, like bots. It would be a
25 whole suite of tools that researchers have

1 documented as -- as being part of this Russian
2 propaganda and disinformation toolbox.

3 **Q. And what steps did the GEC take to**
4 **combat those tools?**

5 MR. KIRSCHNER: Objection, assumes
6 evidence not in the record.

7 A. The primary step, the primary
8 focus, was to expose this effort through things
9 like a public report that the Global Engagement
10 Center released on the pillars of Russian
11 disinformation and the ecosystem that Russia
12 used to promote it.

13 **Q. Were there any -- you say that was**
14 **the primary focus, was there other aspects of**
15 **that attempt to counter this Russian**
16 **disinformation?**

17 A. Yes. The GEC would act along the
18 major lines of effort that I've described. So
19 it would conduct analysis along the lines of
20 that report, it would coordinate within the US
21 government, and it would work with partners to
22 counter the propaganda and disinformation
23 abroad.

24 **Q. What kind of partners?**

25 A. Nongovernmental organizations,

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1 foreign governments, research organizations.

2 Q. And what kind of work would be done
3 with those partners or was done?

4 A. Research on Russian propaganda
5 narratives, research on the resonance, the
6 substance, interactions with foreign governments
7 on what they're tracking, for example.

8 Q. Were there any interaction with
9 social media companies about these kinds of
10 Russian disinformation related to COVID-19
11 vaccines?

12 A. I believe that -- that it would
13 have come up in some of the meetings that I
14 described with the social media companies, yes.

15 Q. So you believe that in those
16 meetings with social media companies, that you
17 described as occurring in 2021, there was
18 discussion of Russian disinformation campaigns
19 related to COVID-19?

20 A. I don't recall in 2021. I believe
21 it was more of a pressing topic a little
22 earlier, when the pandemic was at its height.

23 Q. So that would have been in 2020,
24 most likely?

25 A. 2020, for example.

1 **Q. How about other -- were there other**
2 **Russia-originated COVID disinformation**
3 **campaigns, other than the efficacy of -- the**
4 **relative efficacy of Russian and American**
5 **vaccines?**

6 A. Yes. I believe there were Russian
7 narratives about the origins of the virus.
8 There were false allegations about US government
9 research facilities. The -- the -- there would
10 be a wide array of propaganda narratives.

11 **Q. What -- what would be the -- what**
12 **was the nature of the origins of the virus**
13 **disinformation from Russia?**

14 A. I -- I don't recall the specific
15 narratives. I believe there were some that --
16 that alleged a US government role.

17 **Q. What sort of role?**

18 A. US government funded research or --
19 or -- or some US government role along the lines
20 of the campaign in the 1980s that you
21 referenced.

22 **Q. So there was a Russian**
23 **disinformation campaign that suggested that the**
24 **US government had some role in creating the**
25 **COVID-19 virus?**

1 A. There were multiple Russian
2 disinformation campaigns, involving a large
3 number of narratives, and that would have been
4 one of the narratives.

5 **Q. Was that another narrative that was**
6 **discussed in those 2020 timeframe meetings with**
7 **social media platforms?**

8 MR. KIRSCHNER: Objection,
9 mischaracterizes testimony, assumes evidence not
10 in the record.

11 A. I don't recall.

12 **Q. Now, you do remember that the**
13 **Russian disinformation about vaccine efficacy**
14 **was discussed in those meetings; fair to say?**

15 A. I don't recall any specific
16 discussions. I -- it's entirely within the
17 realm of possibility, discussed Russian
18 narratives. I don't recall the specific
19 narratives.

20 **Q. Okay. So you believe that you may**
21 **well have discussed Russian narratives in those**
22 **2020 meetings with the social media platforms as**
23 **it pertains to COVID?**

24 A. Yes, it's possible.

25 **Q. And you don't remember which**

1 **specific Russian narratives were discussed?**

2 A. No, I don't.

3 **Q. How about Chinese narratives that**
4 **relate to COVID. You referred to those earlier.**
5 **What are those?**

6 A. So those would be also focused on
7 the origins of the virus, also touting China's
8 effective response to the -- to the pandemic,
9 and contrasting that favorably to other
10 countries, including the United States on --
11 those would be two Chinese narratives related to
12 the pandemic.

13 **Q. What did the Chinese disinformation**
14 **say about the origins of the virus?**

15 A. I don't recall, specifically. I
16 believe that it was also insinuating, in some
17 cases, a non-Chinese origin of the virus, much
18 along the lines -- along the lines of what
19 Russian propaganda insinuated.

20 **Q. Did it insinuate a US government**
21 **role or an American role of the origins of the**
22 **virus?**

23 A. I don't recall the specific
24 narratives, no.

25 **Q. Do you know whether those Chinese**

1 **narratives were discussed in relation to the**
2 **social media companies?**

3 A. I don't recall the narratives. I
4 believe we were focused on some of the
5 techniques that China was using, a little bit
6 more than the content of the narratives, so
7 botnets, for example.

8 Q. So did you, for example, tell them
9 that the Chinese were using bots to spread
10 **narratives?**

11 A. I don't know whether we told them.
12 I know that we discussed Chinese use of bots.

13 Q. Okay. What did you say about the
14 **Chinese use of bots?**

15 A. That they were using them.

16 Q. Okay. And how about Russia, what
17 **was discussed about Russian disinformation, to**
18 **your recollection?**

19 A. I believe it would have been the
20 narratives, and that it would -- that I already
21 mentioned.

22 Q. So with respect to Russia,
23 **narratives were discussed, whereas, with respect**
24 **to China, to your recollection, techniques were**
25 **discussed, like using bots as opposed to**

1 **narratives?**

2 A. Yes, because one of the notable
3 features of the pandemic was that China began to
4 adopt techniques that we had previously really
5 only seen Russia use. So, for example, Russia
6 has been documented in many reports as using
7 aggressive online tactics, proxies, bots,
8 trolls. China had not been as active in that
9 way.

10 And so during the pandemic we began
11 to see both the convergence of narratives
12 between China and Russia and a convergence of
13 techniques.

14 So those were things that -- that
15 we and other researchers were seeing during the
16 pandemic.

17 **Q. See, when you say a convergence,**
18 **you mean a convergence between what Russia and**
19 **China are both doing?**

20 A. Yes, a convergence both of
21 narratives and the techniques for disseminating
22 those narratives.

23 **Q. And maybe this piggybacks on -- if**
24 **you can look back at that document, the very**
25 **next sentence or the next part of that sentence,**

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1 it says: The GEC is countering disinformation
2 on the spread of COVID-19 and China already has
3 tried to discredit US vaccine efforts; do you
4 see that?

5 A. Yes.

6 Q. Do you recall narratives from China
7 that were trying to discredit US vaccine
8 efforts?

9 A. I don't recall specific narratives,
10 but I do recall that China was disseminating
11 narratives that tried to discredit US vaccine
12 efforts.

13 Q. Do you know if those were similar
14 to the Russian narratives that you described a
15 moment ago?

16 A. I believe that they -- they were,
17 they may have differed in some specifics, but
18 yes.

19 Q. And were those narratives about
20 vaccine efficacy discussed in the meetings with
21 social media platforms during, as you said, the
22 height of the pandemic?

23 A. I -- I don't recall the specific
24 discussions.

25 Q. So you don't know for sure, is that

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1 **something that could well have been raised in**
2 **those meetings?**

3 MR. KIRSCHNER: Objection,
4 speculative.

5 A. Yes, it is.

6 MR. SAUER: Can you get H?

7 Let's hand you a document that
8 we're going to label Exhibit 5.

9 (Exhibit No. 5 was marked for
10 identification.)

11 BY MR. SAUER:

12 **Q. Do you recognize Exhibit 5?**

13 A. I do.

14 **Q. And is this a GEC special report**
15 **called: Pillars of Russia's Disinformation and**
16 **Propaganda Ecosystem?**

17 A. Yes.

18 **Q. And this report, I think, was**
19 **singled out for particular praise in your recent**
20 **OIG report; is that fair to say?**

21 A. I believe so.

22 **Q. Can you turn to page 8. You see**
23 **how I'm kind of turning it sideways, and there's**
24 **five graphics.**

25 On the far right graphic, under

1 **Cyber Enabled Disinformation, what is cyber**
2 **enabled disinformation?**

3 A. It's using cyber tools to
4 disseminate disinformation.

5 **Q. And what -- what are some examples**
6 **of cyber enabled disinformation by foreign**
7 **actors?**

8 A. So these would be listed beneath
9 it, for example, hacking into a system, taking
10 data out of that system and releasing it into an
11 online environment, that would be an example of
12 cyber enabled disinformation.

13 **Q. Okay. And so could you give**
14 **example of when that's ever happened, without**
15 **straying into any sensitive areas?**

16 A. I believe an example would be
17 the -- I believe this is documented in either
18 the senate intelligence committee report or
19 another congressional report would be the
20 Russian hacking of the DNC e-mails, and then the
21 subsequent release, that would be an example of
22 a hack and release operation.

23 **Q. Okay. So -- and that's -- that's**
24 **what happened in 2016, I believe?**

25 A. I believe so.

1 Q. That's a situation where Russian
2 foreign actors just hacked into the DNC's
3 e-mails and then publicly released them on
4 Wikileaks or something like that; right?

5 A. Yes.

6 Q. Or they publicly released them in
7 some form, it's fair to say?

8 A. Publicly released them in some
9 form.

10 Q. Is that a disinformation campaign?
11 How is that a form of disinformation?

12 A. It can be if the information is
13 altered, it can be if the context is
14 misrepresented, it -- it -- it depends very much
15 on the context.

16 Q. Can you -- are there other examples
17 of hack and release operations that the GEC has
18 tracked?

19 MR. KIRSCHNER: Objection,
20 mischaracterizes evidence, assumes evidence not
21 in the record.

22 A. The GEC did not track any of the
23 2016, it hadn't been established with the
24 mandate to do so.

25 Q. Are there examples of hack and

1 release operations since then, that the GEC has
2 focused on?

3 A. Not that I recall right now. You
4 know, this -- this is focused on the techniques,
5 not specific operations.

6 Q. And without identifying any
7 specific operations, from your five-year period
8 at GEC, do you recall any hack and release
9 operations, other than the 2016 hack by Russians
10 of the DNC's e-mails?

11 A. Without getting into specifics, I
12 do recall internal discussions about Russian
13 hacking, yes.

14 Q. Okay. It was -- were the
15 discussions of Russian hacking that relate to
16 incidents other than the 2016 hacking incident
17 that you described?

18 A. Yes.

19 Q. Okay. I don't want to get into
20 specifics, but what -- in what timeframe were
21 you focused, if you can say, what timeframe was
22 there other concerns about specific issues of
23 potential Russian hacking?

24 A. Concern over Russian hacking would
25 have been ongoing throughout the period of the

1 GEC's mandate.

2 Q. How about, is there any -- other
3 than a general concern for it arising from
4 obviously a very high profile hack that you
5 referred to, was there concern that other
6 incidents of hacking and releasing may have
7 occurred?

8 A. Yes, there was concern.

9 Q. Okay. And were there actual hack
10 and release operations that succeeded?
11 Presumably it's released, it's probably now a
12 matter of public record if they did succeed.

13 MR. KIRSCHNER: Objection, to the
14 extent that this is calling for classified
15 information, defer to the witness on this, but
16 I -- I do want to make sure that we -- or law
17 enforcement information, I want to make sure we
18 stay clear of that.

19 So I will instruct the witness not
20 to answer to the extent that this calls for
21 classified or law enforcement material.

22 A. The GEC, itself, doesn't have the
23 tools to track things like hacking operations.
24 We would have followed reporting from those
25 who -- who did have those tools and those

1 priorities.

2 Q. Okay. And you say is that public
3 reporting or would that be internal government
4 reporting?

5 A. Potentially both.

6 Q. What public reporting would you
7 have followed?

8 A. Media reports.

9 Q. Do you remember media reports
10 relating to Russian hacking that addressed any
11 incident other than the 2016 DNC Russian hack?

12 A. I don't recall anything specific,
13 no.

14 Q. You mentioned hack and release
15 incidents in your report as a technique used by
16 the Russians. Did you have a basis for
17 identifying that as a technique that they used,
18 other than the 2016 DNC hack?

19 MR. KIRSCHNER: Objection,
20 mischaracterizing the evidence, the testimony.

21 A. I -- I don't recall. I didn't do
22 the base -- basic research for this report. I
23 don't recall.

24 Q. Do you know -- do you know what the
25 basis was for identifying them in this report?

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1 **By them, I mean hack and release techniques.**

2 A. I believe it's footnote 16, here.

3 So we could look in the report.

4 **Q. Yeah, can you flip to the next page**
5 **where footnote 16 occurs?**

6 A. Mm-hmm.

7 **Q. It's page 9.**

8 **I think there's two things cited**
9 **there, one is a US Department of Justice report**
10 **on the investigation into Russian interference**
11 **in the 2016 presidential election; do you see**
12 **that?**

13 A. Yes. Yes.

14 **Q. And does that refer to that 2016**
15 **hack, high profile hack?**

16 A. Yes.

17 **Q. And then, underneath it, there's a**
18 **government of the Netherlands, Netherlands**
19 **defense intelligence and security service**
20 **disrupts Russian cyber operation targeting OPCW.**

21 **Do you know what OPCW is?**

22 A. It's the organization for the --
23 it's about chemical weapons. It's a chemical
24 weapons focused.

25 **Q. Okay.**

1 A. I don't recall the exact acronym.

2 Q. Gotcha. Other than those two
3 incidents cited in the footnote, can you recall
4 any other incidents that would have supported
5 the report's conclusion that hack and release is
6 a disinformation technique used by Russia?

7 A. No.

8 Q. Do you remember any conversation
9 you had with that technique of hack and release
10 with any social media platform?

11 A. No.

12 Q. Do you recall that being discussed
13 by any -- that technique, hack and release,
14 being used by or being discussed by anyone else
15 at the GEC in any social media platform?

16 A. No.

17 MR. SAUER: Let's do I.

18 And this is going to be labeled --
19 I think we're on Exhibit 6.

20 (Exhibit No. 6 was marked for
21 identification.)

22 BY MR. SAUER:

23 Q. Do you recall participating in an
24 interview or panel discussion at the Brookings
25 Institution on October 2nd, 2020?

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1 A. Yes.

2 Q. Okay. And rather than play the
3 entire video, we got a little excerpt here of
4 comments you made about minute 29.

5 A. Mm-hmm.

6 Q. Can you look at that? There's a
7 question from Fiona Hill and then answered by
8 you; correct?

9 A. Yes.

10 MR. KIRSCHNER: Objection, assuming
11 evidence not in the record or lack of
12 foundation.

13 BY MR. SAUER:

14 Q. This document --

15 MR. KIRSCHNER: Let me just make
16 the record clear. Lack of foundation.

17 BY MR. SAUER:

18 Q. This document kind of reports you
19 saying, in this online video on YouTube,
20 basically discussing government coordination;
21 fair to say?

22 A. Yes.

23 Q. And you say it doesn't have an
24 exciting visible component; correct?

25 A. Yes.

1 Q. And it consists of e-mails and
2 phone calls and meetings; right?

3 A. Yes.

4 Q. And you say: We are in close
5 communication with our colleagues at DHS; right?

6 MR. KIRSCHNER: Objection, lack of
7 foundation. We don't have the full context.
8 Just objection to this entire line of
9 questioning on this exhibit as lacking
10 foundation.

11 BY MR. SAUER:

12 Q. And you go on to say: We're in
13 close communication with our colleagues at DHS;
14 correct?

15 A. Yes.

16 Q. What was the nature of the
17 communication that you're referring to there
18 when you made this statement?

19 A. E-mails.

20 MR. KIRSCHNER: Objection, assuming
21 evidence that's not in the record.

22 A. E-mails, phone calls and meetings.

23 Q. Okay. What kind of coordination,
24 back in that late 2020 timeframe, what kind of
25 close communication was going on with colleagues

1 at DHS?

2 A. Communication related to the GEC's
3 mandate to counter foreign propaganda
4 misinformation.

5 Q. Who at DHS was GEC communicating
6 with?

7 MR. KIRSCHNER: Objection, asked
8 and answered.

9 A. It would have been primarily the
10 office, either -- I don't recall what it was
11 called, at the time, but the task force or
12 what's I believe now known as the
13 misinformation, disinformation and
14 mal-information office.

15 Q. So that's the mis-dis- and mal
16 information team we talked about earlier?

17 A. Right.

18 Q. And this October 2nd, 2020 is about
19 a month before the 2020 election?

20 A. Right.

21 Q. Who was communicating between GEC
22 and DHS in that timeframe?

23 MR. KIRSCHNER: Objection, assuming
24 evidence not in the record.

25 A. I don't recall the specific staff

1 members who would have done that.

2 **Q. Would you have been involved in**
3 **those communications?**

4 A. Generally not, not the direct
5 communications, no.

6 **Q. Do you remember what your basis was**
7 **for saying that we're in close communication**
8 **with our colleagues at DHS?**

9 MR. KIRSCHNER: Objection, assuming
10 evidence not in the record, lack of foundation.

11 A. It would have been meetings with
12 the head of the relevant interagency team at the
13 GEC or meetings where the person from that team
14 would report on other agencies that they were in
15 communication with, so they would list that
16 we're in communication with DHS, for example.

17 **Q. Okay. And do you -- I'm sorry, you**
18 **may have answered this -- who at GEC is involved**
19 **in these meetings?**

20 MR. KIRSCHNER: Objection, assuming
21 evidence not in the record, mischaracterizes
22 testimony, vague.

23 A. It would be the staff from the I2C2
24 or potentially someone with relevant subject
25 matter expertise from one of the threat teams at

1 GEC.

2 Q. And do you know what was discussed
3 in those meetings of close communication with
4 DHS in the October 2020 timeframe?

5 MR. KIRSCHNER: Objection,
6 mischaracterizes his testimony, assumes evidence
7 not in the record, lack of foundation.

8 A. No, not specifically.

9 Q. You just don't remember what was
10 discussed in those meetings?

11 MR. KIRSCHNER: Objection,
12 mischaracterizes testimony, assumes evidence not
13 in the record.

14 A. It wouldn't be -- there wouldn't be
15 any reason to report the content of a specific
16 communication to the principal deputy
17 coordinator.

18 Q. Who would we have to ask to know
19 what was said in those meetings?

20 MR. KIRSCHNER: Objection,
21 speculative.

22 A. The staffers involved.

23 Q. And you think those staffers would
24 have been people in the TET or the I2C2 -- sorry
25 -- I2C2?

1 MR. KIRSCHNER: Objection,
2 speculative.

3 A. It could be the I2C2 team, but it
4 could be anyone with relevant subject matter
5 expertise at the GEC.

6 **Q. Who was in charge of the I2C2 team**
7 **at this time?**

8 A. I believe it was Stevie Hamilton,
9 but it may have been somebody else. I don't
10 remember the exact dates of all of the heads of
11 all the teams.

12 **Q. Is that a matter of public record**
13 **who's in charge of the I2 -- I2C2 team?**

14 A. I don't believe so. I don't think
15 that the GEC provides information below the
16 level of coordinator on who's in charge of which
17 team.

18 **Q. Who has been in charge of the I2C2**
19 **team during your tenure there?**

20 A. I believe it was Stevie Hamilton.

21 **Q. The whole time?**

22 A. I believe so. There may have
23 been -- there was a lot -- a lot of staff
24 movement. I believe it was Stevie Hamilton.

25 **Q. Do you remember anyone else being**

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1 in charge of that team?

2 A. I don't recall.

3 Q. The next sentence in this Exhibit 6
4 says: With our colleagues at FBI, the Global
5 Engagement Center has set up an interagency
6 coordination cell; do you see that?

7 A. Yes.

8 Q. Is that a true statement?

9 A. I believe that we set up an
10 interagency coordination cell that was in
11 contact with the FBI. So I would -- I would --
12 I would clarify it that way.

13 Q. What is an interagency coordination
14 cell? I mean, what does that mean?

15 A. So an interagency coordination cell
16 is a team with, say, a number of members, and
17 each one will be responsible for contact with
18 one or more agencies in the interagency.

19 So you have an individual whose job
20 it is to stay in contact with components in the
21 intelligence community or the Department of
22 Defense or DHS. That's what an interagency
23 coordination cell would be.

24 Q. So someone whose who's tasked with
25 remaining in fairly close contact with another

1 **close counterpart at another agency?**

2 A. Yes, with the clarification that it
3 may be sporadic, it may be close, it could
4 depend on events, it could depend on what's
5 happening. It can be difficult to predict how
6 close it is.

7 The primary engagements for the
8 Global Engagement Center were really with the
9 Department of Defense and the intelligence
10 community.

11 **Q. Without mentioning their names or**
12 **by title, do you know who at the -- or role --**
13 **do you know who at the GEC was involved in this**
14 **interagency coordinating cell with -- with the**
15 **FBI?**

16 A. No, I don't recall.

17 **Q. Do you know what team they would**
18 **have been on?**

19 A. I believe it would have been the
20 I2C2 team.

21 **Q. So you believe someone -- this**
22 **interagency coordinating cell means someone at**
23 **IC -- I2C2 is designated to be in -- in close**
24 **contact with someone in the FBI?**

25 A. Yes, there would be someone with a

1 portfolio that includes FBI for coordination.

2 Q. And then who on the FBI side would
3 they have -- did they coordinate with, to your
4 knowledge?

5 MR. KIRSCHNER: Objection,
6 speculative.

7 BY MR. SAUER:

8 Q. And again, not names, I just want
9 to know their title and role.

10 A. I don't know their title.

11 Q. Okay. Do you know what their role
12 would have been or what office or section they
13 would have been involved in?

14 MR. KIRSCHNER: Objection,
15 speculative.

16 A. I believe it would be the foreign
17 influence task force at the FBI.

18 Q. So you believe -- does that -- is
19 that ongoing to this day, is there still an
20 interagency coordinating cell between GEC and --
21 can I call it the FITF?

22 A. Sure.

23 Q. The FBI? Is that ongoing to this
24 day?

25 A. I believe there is an interagency

1 cell at the GEC. I don't know which other
2 agencies it's in contact with now or the
3 frequency of those contacts.

4 Q. There is an interagency cell at the
5 GEC, but you don't know whether or not that
6 interagency cell is in contact with the FBI now?

7 A. Yes, that's correct.

8 Q. But I take it, they were in contact
9 with the FBI during October of 2020, when you
10 gave the talk at the Brookings Institute?

11 MR. KIRSCHNER: Objection, assumes
12 evidence not in the record, mischaracterizes
13 testimony.

14 A. I don't know whether they were in
15 contact in October 2020. But when I was giving
16 these remarks the I2C2 would have had someone
17 with FBI in their profile. And if the
18 circumstances required they would be in touch
19 with a counterpart at the FBI.

20 Q. Do you know whether there were any
21 such communications during that timeframe?

22 A. I don't.

23 Q. And you go on to say: So we are in
24 constant communication, in the next sentence of
25 Exhibit 6; do you see that?

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1 A. Yes.

2 MR. KIRSCHNER: Objection.

3 BY MR. SAUER:

4 Q. What's that a reference to, the
5 constant communication?

6 MR. KIRSCHNER: Objection, lack of
7 foundation, assumes evidence not in the record.

8 BY MR. SAUER:

9 Q. On your understanding?

10 A. It's a reference to the GEC's
11 exercise of it's interagency coordination
12 mandate, which requires communications with the
13 relevant agencies.

14 Q. And that's done through the I2C2's
15 coordination cell to communicate with the FBI?

16 A. Yes. The I2C2 is specifically
17 focused on interagency communication, but it
18 could involve anyone with relevant subject
19 matter expertise.

20 Q. Do you know anyone -- let me ask
21 you this: Do you recall any issues that the GEC
22 raised with the FBI's FITF at any time, without
23 saying what the issues are, do you know whether
24 there were issues that the GEC raised with the
25 FITF?

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1 A. I don't recall any specific issues,
2 no.

3 Q. Is it possible that they did and
4 you just don't remember or do you believe that
5 they never did raise an issue with the FITF?

6 MR. KIRSCHNER: Objection,
7 speculative.

8 A. It's possible that they raised an
9 issue with the FBI, yes.

10 Q. And they being someone within the
11 I2C2?

12 A. Yes.

13 Q. Okay. But you just don't know what
14 sort of communication?

15 A. No, I don't.

16 MR. KIRSCHNER: Objection,
17 mischaracterizes testimony.

18 BY MR. SAUER:

19 Q. More generally -- sorry, you can
20 answer that question.

21 A. I -- I don't recall.

22 Q. Okay. Do you recall any
23 interaction, any substantive interaction,
24 between FITF and the GEC?

25 A. I don't recall any substantive

1 interaction. There were just a lot of different
2 meanings. I don't recall anything specific and
3 substantive.

4 **Q. Did you ever interact with FITF?**

5 A. I believe I may have been in the
6 context of an interagency meeting with -- with
7 representatives of I think they call it FITF or
8 FITF, but I don't recall any specific meetings.

9 **Q. Was that a -- when you say an**
10 **interagency meeting, was there a -- an**
11 **essentially GEC/FITF meeting?**

12 A. I don't recall a GEC/FITF meeting.
13 I mean a broader interagency meeting, where one
14 of the representatives would have been FBI, for
15 example.

16 **Q. Do you know who's in charge of**
17 **FITF?**

18 A. I don't know who's in charge of
19 FITF, no.

20 **Q. Other than what we've just now**
21 **talked about, are you aware of any interactions**
22 **between GEC and FITF?**

23 A. I'm not aware of any specific
24 interactions. As I said, in the interagency,
25 it's entirely possible that we would have been

1 in meetings together, yes.

2 Q. Do you remember anything about
3 those meetings?

4 MR. KIRSCHNER: Objection,
5 mischaracterizes testimony and assumes evidence
6 not in the record.

7 A. I don't recall any specific items
8 involving FITF, no.

9 MR. SAUER: Let me give you another
10 exhibit. I've got this one. I think this is
11 going to be 7, right?

12 (Exhibit No. 7 was marked for
13 identification.)

14 MR. KIRSCHNER: Counsel, do you
15 know how long you're going to spend on this
16 exhibit? I'm just trying to think in terms of a
17 possible lunch break.

18 MR. SAUER: Oh, well, if we go for
19 about five minutes?

20 MR. KIRSCHNER: Okay.

21 MR. SAUER: We can revisit it. I'm
22 not sure, but once we're done with this exhibit
23 why don't we raise that?

24 MR. KIRSCHNER: Okay. I just
25 didn't know if you were going to spend an hour

1 on one exhibit. I just --

2 MR. SAUER: My exhibits are like my
3 children. I love them all equally.

4 BY MR. SAUER:

5 Q. Mr. Kimmage, I've handed -- you've
6 been handed Exhibit 7, which is excerpts from
7 the second amended complaint in this case.

8 Have you ever reviewed the second
9 amended complaint?

10 A. Yes, I have looked at this.

11 Q. So you've seen this before, this
12 document before, or you've seen the big
13 document, this is obviously only 14 pages of the
14 162 page?

15 A. Yes.

16 Q. Fair to say you've seen it before?

17 A. Yes.

18 Q. Can you flip to page 117?

19 A. Mm-hmm.

20 Q. And look at paragraph 396.

21 A. Mm-hmm.

22 Q. And there's a -- there's an
23 allegation in paragraph 396 that says: Pursuant
24 to third-party subpoena, Twitter has identified
25 personnel associated with the State Department's

1 **Global Engagement Center, including Alexis**
2 **Frisbee and Daniel Kimmage, as likely involved**
3 **in communications with Twitter about censorship**
4 **and/or content modulation on issues such as**
5 **election integrity, vaccines/COVID**
6 **misinformation, and related subjects; do you see**
7 **that?**

8 A. I see that.

9 Q. Do you know what -- if -- to the
10 **extent Twitter said that about you, do you know**
11 **what they were referring to? Do you remember**
12 **any meetings with Twitter?**

13 MR. KIRSCHNER: Objection, lack of
14 foundation.

15 BY MR. SAUER:

16 Q. **Let's start with the first**
17 **question.**

18 Do you remember meetings with
19 **Twitter?**

20 A. I recall at least one meeting with
21 Twitter.

22 Q. Do you remember any other meetings
23 **besides the one?**

24 A. Yes, I recall at least two meetings
25 with Twitter.

1 Q. Okay. Do you recall any besides
2 those two?

3 A. No, I do not.

4 Q. When did those meetings occur?

5 A. One was in 2021, and one would have
6 been before the pandemic.

7 Q. Would that have been in 2019 or
8 late 2020?

9 A. Potentially 2019 or even 2018. I
10 don't recall the date.

11 Q. Okay. The 2021 meeting, let's
12 start with that, what -- what -- do you know
13 what time of year that happened?

14 A. It would have been in the spring, I
15 believe.

16 Q. Do you remember more specifically
17 what date it was?

18 A. No, I don't.

19 Q. Would that be reflected on your
20 official calendar?

21 A. I believe it would be, yes.

22 Q. Do you know who attended that
23 meeting?

24 A. It would be the acting coordinator,
25 me, in that capacity, then one or more of the

1 deputy coordinators, team chiefs from the Global
2 Engagement Center, and working-level staff with
3 relevant subject matter expertise.

4 **Q. So a significant number of**
5 **individuals on the GEC side were at that**
6 **meeting?**

7 MR. KIRSCHNER: Objection,
8 mischaracterizes testimony, assumes evidence not
9 in the record.

10 A. How would you define significant?

11 **Q. Well, how many people on the GEC**
12 **side would you estimate?**

13 A. Between five and ten.

14 **Q. Okay. And that included you and**
15 **you were then acting coordinator?**

16 A. Yes, in 2021, from February to
17 June, yes.

18 **Q. And then the deputy coordinator was**
19 **there, too?**

20 A. I believe so.

21 **Q. Who was that?**

22 A. At the time, it would have been
23 Leah Bray.

24 **Q. And then the team chief, who's**
25 **that?**

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1 A. Patricia Watts, the Technology
2 Engagement Team.

3 Q. So that was a TET team?

4 A. The TET, right.

5 Q. And was there anyone else from the
6 TET there?

7 A. I believe Alexis Frisbee.

8 Q. Okay. How about -- you mentioned
9 subject matter experts?

10 A. Right.

11 Q. Who -- do you remember -- I don't
12 necessarily want their -- well, let me ask this:
13 What unit did they come from?

14 A. I don't recall for the 2021
15 meeting.

16 Q. Do you know was Russia maybe?

17 A. I simply don't remember who all the
18 GEC personnel were.

19 Q. Okay. And then who was present at
20 that meeting on the Twitter side?

21 A. I -- I don't remember the
22 individual.

23 Q. There's only one person?

24 A. No, there were others, but I don't
25 remember their names.

1 Q. Okay. Do you remember what their
2 roles were within Twitter?

3 A. I believe it was the -- the sort of
4 assurance or compliance. I don't recall the
5 exact name of the component within Twitter.

6 Q. When you say assurance or
7 compliance, what is that, a member of the trust
8 and safety team?

9 A. It may have been, yes.

10 Q. Does that sound right to you, at
11 least?

12 MR. KIRSCHNER: Objection,
13 speculative.

14 A. Yes.

15 Q. If you know? Is that a yes?

16 A. Yes.

17 Q. To the best of your recollection,
18 someone from the trust and safety team was
19 there?

20 A. Yes.

21 Q. Do you know if it was a man or a
22 woman?

23 A. No.

24 Q. And you -- you -- do you believe
25 there were other members of Twitter there or

1 **Twitter officials?**

2 A. Yes.

3 **Q. How many, would you say?**

4 A. Fewer than on our side.

5 **Q. Were they -- so maybe less than**
6 **five?**

7 A. Yes.

8 **Q. And there would be a -- on your**
9 **official calendar, if there were an -- there's**
10 **an invite for this meeting; correct?**

11 A. Yes.

12 **Q. And that would reflect all the**
13 **participants; fair to say?**

14 MR. KIRSCHNER: Objection,
15 speculative.

16 A. I -- I --

17 MR. KIRSCHNER: Lack of foundation.

18 A. I don't know how the invite is
19 structured --

20 **Q. Okay.**

21 A. -- and what it reflects.

22 **Q. Let me ask you this: Were there**
23 **other individuals from Twitter, there? Do you**
24 **remember any of their names?**

25 A. No.

1 **Q. Do you remember any of their roles**
2 **within Twitter?**

3 A. I believe their roles were in
4 the -- the trust and safety area.

5 **Q. So there would be multiple Twitter**
6 **officials from the trust and safety group there?**

7 A. Yes, I believe so.

8 **Q. How about any other area of**
9 **Twitter, you know, did anyone else attend that**
10 **wasn't a trust and safety person?**

11 A. Not that I recall.

12 **Q. Who asked for this meeting, was**
13 **it -- did GEC ask for it or did Twitter ask for**
14 **it?**

15 A. I -- I don't recall where the exact
16 impetus came from, which side initiated, which
17 side asked for the meeting.

18 **Q. Okay. Was this a recurring meeting**
19 **or was it kind of a standalone meeting that had**
20 **been set up to address a specific topic?**

21 A. As I said, we had -- we hoped to
22 set up recurring quarterly meetings. I don't
23 recall whether this one was -- was a
24 continuation, as in whether the same people were
25 there from our side. I was only recently in the

1 role of acting coordinator, because before that
2 there was an appointed coordinator.

3 **Q. Who was that?**

4 A. That was Lea Gabrielle, the
5 appointed coordinator before the --

6 **Q. Okay. So what was discussed in**
7 **this meeting?**

8 A. So as I said, in this meeting the
9 GEC would provide an overview of what it was
10 seeing in terms of foreign propaganda and
11 disinformation. And Twitter would, to the
12 extent that they felt comfortable sharing
13 information, would discuss similar topics.

14 **Q. And you said would?**

15 A. Right.

16 **Q. Did you -- you said you would**
17 **provide it, and they would share, in fact,**
18 **did -- did you guys do that?**

19 A. I recall that we gave an overview.
20 I don't recall the specifics of what Twitter
21 presented.

22 **Q. What did -- what did you get an**
23 **overview of?**

24 MR. KIRSCHNER: Objection, calls
25 for a narrative response.

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1 A. I believe it was an overview of the
2 major actions by malign foreign actors, like
3 Russia, China, and terrorist organizations.

4 **Q. Do you remember what was discussed**
5 **about that?**

6 A. I -- I -- I don't.

7 **Q. Who was the principal speaker in**
8 **this meeting, on your side, or was there?**

9 A. The -- the GEC side had multiple
10 speakers. I believe I kicked things off with
11 sort of very general remarks, and then there
12 were -- there were other -- other speakers at
13 the GEC.

14 **Q. Did Alexis Frisbee talk?**

15 A. I don't -- I don't recall whether
16 she had a speaking role.

17 **Q. Who -- who else talked, to your**
18 **recollection?**

19 A. I -- I don't recall the specifics
20 of the meeting.

21 **Q. Okay. You don't remember how many**
22 **people talked?**

23 A. No, I don't.

24 **Q. Do you remember any content about**
25 **the conversation?**

1 A. No, I don't remember the specifics.

2 Q. I think if you look back to
3 paragraph 396, there's a specific reference to
4 certain topics.

5 A. Mm-hmm.

6 Q. Election integrity, is that
7 something that was discussed at this meeting?

8 MR. KIRSCHNER: Objection, vague.

9 BY MR. SAUER:

10 Q. If you remember.

11 A. I don't -- I don't recall.

12 Q. Do you remember anything said at
13 the meeting that would have related to elections
14 in any way?

15 A. I don't recall.

16 Q. How about vaccine/COVID
17 misinformation, do you remember anything that
18 would have related to that in a spring 2021
19 meeting with Twitter?

20 A. I -- I -- I just don't recall the
21 specifics of the meeting.

22 Q. How about your own statements of
23 the meeting, do you remember anything that you
24 said at this meeting? I know you said earlier
25 you kicked things off, it sounds like you

1 **introduced some speakers; did you say anything**
2 **else at the meeting?**

3 A. I don't recall the specifics. I
4 would have introduced our team, and talked a bit
5 about sort of general trends and propaganda and
6 disinformation, but I don't -- I simply don't
7 recall the specifics.

8 **Q. So you don't remember anything**
9 **specific about what you personally said in that**
10 **2021 meeting?**

11 A. No, I don't. I would have been
12 doing multiple meetings every day. I just don't
13 recall the specifics.

14 **Q. And you say multiple meetings every**
15 **day, is that with social media platforms in this**
16 **timeframe?**

17 A. No, no, it would have just been
18 multiple meetings in my capacity as the acting
19 coordinator.

20 **Q. Did you have a similar meeting to**
21 **this one, with Facebook or YouTube or any**
22 **others?**

23 A. I believe we had meetings with
24 either Facebook or Google or both. I don't
25 remember the specifics, but there were -- I

1 believe there were meetings with Facebook and
2 Google.

3 Q. Would they be in that same
4 timeframe?

5 A. They would be in the same period
6 when I was the acting coordinator, yes.

7 Q. So in the spring 2021 timeframe?

8 A. Yes.

9 Q. And I think you testified earlier
10 that you were acting coordinator from February
11 to --

12 A. June.

13 Q. -- June? Okay.

14 And you believe you had at least
15 one meeting with Facebook and Google that was
16 similar to this meeting with Twitter that we
17 have been talking about?

18 MR. KIRSCHNER: Objection,
19 mischaracterizes testimony.

20 A. I believe we -- we -- we met with
21 them, yes.

22 MR. SAUER: Apparently I didn't
23 mischaracterize it.

24 MR. KIRSCHNER: Those were
25 different statements. He said something

1 different than what you said.

2 BY MR. SAUER:

3 Q. Did you have a similar meeting with
4 Facebook and Google, during this timeframe, that
5 was similar to the meeting you had with Twitter?

6 A. I believe so, I don't recall the
7 specifics of which -- which company we met with.

8 Q. So you're not sure whether you met
9 with Facebook?

10 A. I believe we did. I don't -- I
11 don't recall, exactly. I believe we met with
12 Facebook.

13 Q. Do you remember who at Facebook you
14 met with or what their roles were?

15 A. I don't remember the individual. I
16 believe it was a similar area. I don't remember
17 what it was called at Facebook. But it was a
18 similar -- similar to the component at Twitter,
19 the assurance or safety part of Facebook.

20 Q. Right. So at Twitter we described
21 it as the trust and safety team --

22 A. Right.

23 Q. -- correct?

24 A. Yes.

25 Q. And then at Facebook you believe

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1 you met with the analogous component of Facebook
2 in your meeting in 2021; fair to say?

3 A. Yes, I believe it was the analogous
4 component.

5 Q. But you don't remember exactly how
6 they described it, but it had similar
7 responsibility to the Twitter trust and safety
8 team; correct?

9 A. I don't recall how they described
10 it, and I don't know what its internal
11 responsibilities are at Facebook.

12 Q. Okay. Okay. But you believe it
13 was the similar or analogous component to the
14 Twitter trust and safety team; fair to say?

15 A. I believe so, it may have been
16 public policy, that was another component.

17 Q. How about Payton Itheme, is that a
18 name you recognize from Facebook?

19 A. No.

20 Q. And then you also had -- believe
21 you had a meeting with Google or, slash, YouTube
22 in that same timeframe?

23 A. I believe so, yes.

24 Q. And would that have been with the
25 same components, the kind of trust and safety

1 **type component at YouTube/Google?**

2 A. I believe it would have been
3 analogous component, yes.

4 **Q. Okay. Do you know how many**
5 **representatives came from Facebook to your**
6 **meeting?**

7 MR. KIRSCHNER: Objection, assumes
8 evidence not in the record.

9 A. No. A handful.

10 **Q. Okay. And then on the GEC side,**
11 **did you have a -- a series of -- or sorry -- did**
12 **you bring similar people on the GEC side to that**
13 **Facebook meeting?**

14 MR. KIRSCHNER: Again, objection,
15 assumes evidence not in the record.

16 A. Yes, I believe the lineup would
17 have been similar.

18 **Q. Have you taken any steps, since you**
19 **read this document for the first time, to**
20 **refresh your recollection about these meetings?**

21 A. No.

22 **Q. Have you reviewed any documents in**
23 **preparation for your deposition.**

24 A. No.

25 **Q. So you read this, but you didn't go**

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1 check and see, oh, did I have a meeting with
2 Twitter? You didn't take any steps to refresh
3 your recollection to try and see what was
4 discussed at that meeting?

5 A. No, I did not.

6 Q. And you haven't reviewed a single
7 document in preparation for your testimony
8 today?

9 A. No. I looked at this when it came
10 out.

11 Q. How about vaccine COVID
12 misinformation, we talked about that statement
13 in paragraph 396, about election integrity, how
14 about vaccine COVID misinformation, is that
15 something that may have come up in those
16 meetings -- that meeting with Twitter, to start
17 with?

18 A. Yes. It's -- it's possible, I -- I
19 don't recall the specifics.

20 Q. And what kind of vaccine/COVID
21 misinformation might have come up?

22 A. The Global Engagement Center would
23 be looking at disinformation narratives or
24 campaigns by foreign actors, like Russia, China,
25 on -- on -- on COVID.

1 **Q. And do you remember that coming up**
2 **in these meetings?**

3 A. I don't recall whether it
4 specifically came up at this meeting. I simply
5 don't recall.

6 **Q. Do you recall whether there were**
7 **any e-mails that relate to these meetings,**
8 **setting them up or having a follow-up or**
9 **anything like that?**

10 MR. KIRSCHNER: Objection,
11 speculative.

12 A. I recall a scheduling invite,
13 that's what I recall.

14 **Q. For all three of them?**

15 MR. KIRSCHNER: Objection, assumes
16 evidence not in the record.

17 A. I -- I recall scheduling, I believe
18 the Twitter and maybe the Facebook meeting,
19 because I had to click on a link for the Zoom
20 part of the meeting.

21 **Q. Oh, right. But as far as**
22 **Google/YouTube you're not sure if you had a**
23 **calendar invite?**

24 A. I -- I -- I just don't recall
25 everything on the calendar.

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1 **Q. You inferred, also, to a meeting**
2 **with Twitter in 2019. Can you tell me about**
3 **that meeting?**

4 A. I believe it was in an initial
5 meeting, after they had set up, like, a policy
6 office in -- in -- in D.C., and I don't remember
7 the individual's name, but it was sort of a -- a
8 meet and greet meeting.

9 **Q. Okay. You personally attended**
10 **that?**

11 A. Yes.

12 **Q. Were you then acting coordinator or**
13 **principal deputy coordinator?**

14 A. I don't recall whether I was the
15 acting coordinator or the principal deputy. I
16 would have been one of those two positions,
17 depending on the date.

18 **Q. Do you know who attended that**
19 **meeting, other than you?**

20 A. No, I don't.

21 **Q. Do you know who attended that**
22 **meeting for Twitter?**

23 A. I -- I don't recall the person's
24 name.

25 **Q. Did you have similar meetings in**

1 that timeframe with any other social media
2 platforms?

3 A. I don't recall specific meetings.
4 I recall the meeting with -- with Twitter, but I
5 don't -- I don't recall other specific meetings.

6 Q. Why does that one stand out in your
7 mind?

8 A. I just remember that Twitter had a
9 new person in Washington, and they were, I
10 think, sort of making the rounds and introducing
11 themselves.

12 Q. Okay. Turning back to the 2021
13 meeting, I think I asked you earlier if you knew
14 whether the GEC had initiated that or whether
15 Twitter had initiated that, I mean, I've asked
16 you a bunch of questions about that, does that
17 jog your recollection at all?

18 A. I -- I don't know who specifically
19 initiated the -- the request for a meeting.

20 Q. Do you know whether there was a
21 specific threat that led to the meeting, that
22 one side or the other wanted to raise a specific
23 issue, and that's what led to the meeting?

24 A. No, I don't -- I don't believe it
25 was -- was based on a specific threat.

1 **Q. And -- and you believe there were**
2 **multiple speakers on the GEC side discussing**
3 **different kinds of threats?**

4 MR. KIRSCHNER: Objection, assumes
5 evidence not in the record, mischaracterizes
6 testimony.

7 A. There were multiple speakers not
8 necessarily addressing threats. These meetings
9 were not threat-focused, they were more general
10 than that.

11 **Q. What were they focused on?**

12 A. Propaganda narratives disseminated
13 by foreign actors, like Russia and China.

14 **Q. Okay. And do you remember what**
15 **narratives were discussed?**

16 MR. KIRSCHNER: Objection, assumes
17 evidence not in the record, mischaracterizes
18 testimony.

19 A. I -- I don't recall the specific
20 Russian or Chinese campaigns we would have been
21 discussing in the spring of 2021.

22 **Q. Do you believe you were discussing**
23 **Russian and Chinese disinformation campaigns at**
24 **that meeting in 2021 with Twitter?**

25 MR. KIRSCHNER: Objection,

1 speculative.

2 A. Yes, I -- I believe we would have,
3 we would have discussed those, yes.

4 Q. Would you also have discussed
5 techniques, like, for example, the techniques
6 that are discussed in the report that we showed
7 you earlier on Russian disinformation
8 techniques?

9 A. Yes.

10 Q. How many -- you said there would be
11 multiple speakers, so to speak, from GEC at the
12 Twitter meeting, how many were there on the GEC
13 side?

14 MR. KIRSCHNER: Objection,
15 speculative.

16 A. I believe I answered this, between
17 five and ten.

18 Q. Oh, yes, I think you did. You said
19 there were five attendees?

20 A. On the GEC side.

21 Q. Right. Right. Did everybody talk?
22 Like, did everybody give a little presentation?
23 Was there three of them? That's my question.

24 A. I don't know whether everybody
25 talked. I know that two or three definitely

1 would have talked.

2 MR. KIRSCHNER: Counsel, we've been
3 going for about fifteen minutes when you said
4 five minutes. So I do want to wrap up this line
5 of questioning and then take a break, but I --
6 how much longer do you have?

7 MR. SAUER: Why don't we take a
8 break now, and then we can decide over lunch
9 whether we've wrapped up the line of
10 questioning.

11 For the record, I did not say five
12 minutes. I said I didn't know how long it would
13 go.

14 So I'm fine taking a break. We're
15 at a lunch time.

16 MR. KIRSCHNER: Just let's call it
17 1:30 to get actually started.

18 MR. SAUER: I would rather start at
19 1:15. I don't want to -- I do want to
20 accommodate the --

21 THE VIDEOGRAPHER: Want to go off
22 the record?

23 MR. SAUER: Go ahead. Are we off
24 the record?

25 THE VIDEOGRAPHER: The time is

1 12:23 p.m. We're off the record.

2 (Recess.)

3 THE VIDEOGRAPHER: The time is 1:33
4 p.m. We're back on the record. Please proceed.

5 MR. KIRSCHNER: I'd like to just
6 ask a couple quick clarifying questions for
7 Mr. Kimmage.

8 MR. SAUER: Okay.

9 EXAMINATION

10 BY MR. KIRSCHNER:

11 Q. So Mr. Kimmage, do you remember
12 when counsel asked you if you looked at any
13 documents to refresh your recollection in
14 preparation for this deposition?

15 A. Yes.

16 Q. I just wanted to ask: Do you, upon
17 further memory, remember looking at any
18 documents in preparation of this deposition?

19 A. Yes.

20 Q. And do you know -- do you remember
21 what those documents were?

22 A. I believe they were court
23 documents.

24 MR. KIRSCHNER: Okay.

25 ///

1 EXAMINATION

2 BY MR. SAUER:

3 Q. What documents did you review?

4 A. The amended complaint, I believe.

5 Q. Anything else?

6 A. Court -- some other court document,
7 I don't remember precisely which.

8 Q. What did you read in them?

9 A. Versions of the same charges that
10 are here.

11 MR. SAUER: Can we have K?

12 BY MR. SAUER:

13 Q. Did you read a motion for a
14 preliminary injunction?

15 A. I don't recall, exactly.

16 Q. Did you read a joint statement on
17 depositions?

18 A. I don't recall.

19 Q. Did you read anything other than
20 court documents that are publicly filed in
21 preparation for your testimony today?

22 A. No, I didn't read anything else in
23 preparation for the testimony.

24 MR. SAUER: I think you're being
25 handed what's going to be marked Exhibit 8.

1 (Exhibit No. 8 was marked for
2 identification.)

3 MR. KIRSCHNER: Oh, I have it.

4 BY MR. SAUER:

5 Q. Do you recognize this document?

6 A. Yes.

7 Q. So is this from the website of the
8 Technology Engagement Team within GEC?

9 A. It -- it -- yes, it looks like it.

10 Q. Or it's a description of the
11 Technology Engagement Team online?

12 A. Mm-hmm.

13 Q. Here on the third page there is a
14 paragraph there on Silicon Valley engagement;
15 correct?

16 A. Mm-hmm. Yes.

17 Q. And it states that in December 2019
18 GEC/TET established a Silicon Valley location;
19 correct?

20 A. Yes.

21 Q. Are you familiar with that
22 location?

23 A. Yes, I believe it was an
24 individual.

25 Q. Is that a location related to just

1 **one person?**

2 A. Yes.

3 **Q. Who's that person?**

4 A. I believe it was Sam, I can't
5 remember the last name.

6 **Q. Stewart?**

7 A. Stewart, yes.

8 **Q. So earlier when you testified that**
9 **you thought he worked in D.C. is it possible**
10 **that that was incorrect?**

11 A. He did work in D.C., and then for
12 some portion of that he was also in California,
13 I believe.

14 **Q. How long was there a Silicon Valley**
15 **location?**

16 A. I don't -- I don't recall how long
17 he was actually physically located in Silicon
18 Valley.

19 **Q. Is it -- is someone still there**
20 **today?**

21 A. I don't believe so, no.

22 **Q. And this is on your website now;**
23 **fair to say?**

24 A. I haven't reviewed it. I'm not
25 aware.

1 Q. Do you know how long that Silicon
2 Valley location, consisting of one person, was
3 in operation?

4 A. No, I don't recall.

5 Q. And the purpose of the Silicon
6 Valley location, according to your website, is
7 to facilitate public/private coordination and
8 broker constructive engagements between the US
9 government and the tech sector, as well as
10 academia and research; correct?

11 A. Yes, that's correct.

12 Q. And the tech sector there, is that
13 a reference, in whole or in part, to social
14 media platforms?

15 MR. KIRSCHNER: Objection,
16 speculative.

17 BY MR. SAUER:

18 Q. If you know.

19 A. It would include potentially social
20 media companies, among other -- other -- other
21 tech-related things out there.

22 Q. Does your Silicon Valley engagement
23 person talk to social media platforms?

24 MR. KIRSCHNER: Objection,
25 speculative, assumes evidence not in the record.

1 BY MR. SAUER:

2 Q. If you know.

3 A. Yes.

4 Q. What -- what -- what kinds of
5 conversations did they have or what kind of
6 engagement did they conduct?

7 A. Primarily information sharing.

8 Q. What kind of information?

9 A. Information sharing related to the
10 Global Engagement Center's mission to counter
11 foreign propaganda and disinformation.

12 Q. And that next sentence there says:
13 The goal is to increase collaboration that
14 results in identifying, exposing, and defending
15 against foreign adversarial propaganda and
16 disinformation; correct?

17 A. Yes, that's what it says.

18 Q. What's involved in defending a --
19 collaborating with social media platforms to
20 defend against disinformation?

21 A. Primarily exchanging information to
22 deepen their understanding of the actions of
23 foreign propaganda and disinformation actors.

24 Q. I'm sorry, say that again. I
25 apologize.

1 A. Sure. Primarily deepening their
2 understanding of the actions, the tools,
3 techniques of foreign propaganda and
4 disinformation actors.

5 **Q. So mostly it's GEC educating the**
6 **tech companies on those tools and methods?**

7 A. Not necessarily, I can't
8 characterize what the balance is --

9 **Q. Okay.**

10 A. -- in the engagements.

11 **Q. But the purpose, from your**
12 **perspective, is to educate them on tools and**
13 **methods of dissemination of foreign propaganda**
14 **and disinformation?**

15 MR. KIRSCHNER: Objection,
16 mischaracterizes testimony.

17 BY MR. SAUER:

18 **Q. Is that fair to say?**

19 A. Not necessarily. That would be the
20 primary focus, from the GEC side, but they may
21 also educate us based on what they are seeing.
22 It's -- I can't characterize the exact breakdown
23 of the information sharing.

24 **Q. It's a two-way street, then?**

25 A. Potentially, yes.

1 **Q. Why do you want them educated, them**
2 **being social media platforms? Why do you want**
3 **them to be educated on tools and methods for the**
4 **propagation of foreign disinformation?**

5 A. We want them to understand how
6 foreign propaganda and disinformation actors are
7 trying to exploit the platforms to disseminate
8 propaganda and disinformation.

9 **Q. Why do you want them to understand**
10 **that?**

11 A. We want them to understand it
12 because they are the ones who are the owners of
13 the platforms.

14 **Q. Okay. So why do you want the**
15 **owners of the platforms to understand that?**

16 A. Because it's part of the Global
17 Engagement Center's mission to increase overall
18 awareness of propaganda and disinformation by
19 malign actors.

20 **Q. If they are aware of those foreign**
21 **malign tools and methods, are they more likely,**
22 **on your view, to take their own defensive**
23 **actions against them?**

24 MR. KIRSCHNER: Objection,
25 speculative.

1 A. I -- I can't speculate about the
2 actions that the social media companies may or
3 may not take. We would not ask them to do
4 anything. Our -- the extent of our engagement
5 would be to share insights, but not to ask them
6 to do something.

7 **Q. Has the GEC ever asked a social**
8 **media platform to do something with respect to**
9 **content, other than the 2018 threat you**
10 **described this morning?**

11 MR. KIRSCHNER: Objection,
12 hypothetical, hypothetical, assumes facts not in
13 evidence.

14 A. Not that I'm aware of.

15 MR. SAUER: Can I have L?

16 You're going to be handed a
17 document we're -- I think we're going to call
18 Exhibit 9.

19 (Exhibit No. 9 was marked for
20 identification.)

21 BY MR. SAUER:

22 **Q. Do you see this document?**

23 A. I do.

24 **Q. And this is a collection of e-mails**
25 **we received from the government -- I'm sorry --**

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1 we received from the social media platform
2 LinkedIn, that include Samaruddin K. Stewart; do
3 you see that?

4 A. I do.

5 Q. Okay. Do you know -- do you know
6 whether Mr. Stewart was reaching out to social
7 media platforms to schedule meetings?

8 A. I believe he was.

9 Q. And was he scheduling meetings with
10 just LinkedIn or other meetings? I mean, sorry,
11 other social media platforms?

12 A. I believe it would be others, as
13 well.

14 Q. Do you know which others he did
15 this with?

16 A. No, I don't recall the -- the list.

17 Q. Do you know if he met with Twitter?

18 A. I -- I don't know, no.

19 Q. Do you know if he met with
20 Facebook?

21 A. I don't know his meeting schedule,
22 no.

23 Q. Okay. You don't know, same
24 question as to other social media platforms,
25 your answer is you don't know any of them?

1 A. Not that I don't know them. I
2 simply I don't know what his meeting schedule
3 was, I wouldn't have kept track of his schedule.

4 **Q. Were you generally aware that he**
5 **was setting up meetings with multiple social**
6 **media platforms?**

7 A. Yes.

8 **Q. Did he do that at your direction?**

9 A. He did that as part of his job to
10 facilitate engagement.

11 **Q. And was he on the TET?**

12 A. I believe so, yes.

13 **Q. And I believe -- turn back that**
14 **last exhibit -- was he basically the Silicon**
15 **Valley location that was talked about on your**
16 **website?**

17 A. Yes, I believe so.

18 **Q. On the second page of this**
19 **document, the one bearing Bates page 10342 --**
20 **high level, did you participate in any of the**
21 **meetings that Mr. Stewart set up with social**
22 **media platforms?**

23 A. I believe, yeah, I participated in
24 meetings. I don't know if he was the one who
25 set them up. I don't know the full, like, all

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1 the mechanics.

2 Q. Okay. Do you know who participated
3 in his meetings, other than himself?

4 A. No.

5 Q. Okay. Looking at this, this second
6 page, the one at the top, February 5th, 2020, he
7 initially reached out to Paul Rockwell at
8 LinkedIn; correct? Do you see that in the
9 middle of the page?

10 A. Yes, I see that.

11 Q. Do you know who Paul Rockwell is?

12 A. No.

13 Q. Would it surprise you if he's the
14 vice president and head of trust and safety for
15 LinkedIn?

16 A. No. I don't know his position.

17 Q. Okay. Was -- I know you testified
18 earlier that your Twitter meeting in 2021 dealt
19 with their trust and safety team; correct?

20 A. Right.

21 Q. And then your analogous meetings
22 you had with Facebook and possibly Google, in
23 the same timeframe, were also are the trust and
24 safety teams or their equivalents at those other
25 entities; correct?

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1 A. Yes.

2 Q. Was Mr. Stewart told to reach out
3 to the trust and safety team at LinkedIn?

4 A. I don't believe we instructed him
5 or I didn't instruct him on which individuals or
6 teams to contact.

7 Q. Okay. And he, in this e-mail in
8 February of 2020, reaches out to Paul Rockwell
9 and says he's a senior advisor for the GEC
10 working out of Silicon Valley; correct?

11 A. Yes, I see that.

12 Q. So that corroborates your
13 understanding that he's in the Silicon Valley
14 location, so to speak; correct?

15 A. Yes.

16 Q. And he says that he's in -- his
17 agency's got interest in countering
18 disinformation in foreign state and non-state
19 propaganda; right?

20 A. That's what the e-mail says.

21 Q. Yeah, what's non-state propaganda?

22 A. That would be a terrorist
23 organization, for example.

24 Q. Got you. Okay.

25 And he links in the GEC's website;

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1 correct?

2 A. Yes.

3 Q. He talks about, let's explore
4 shared interest and alignment of mutual goals
5 regarding the challenge; do you know what he's
6 talking about there?

7 MR. KIRSCHNER: I apologize, where
8 are you reading from?

9 MR. SAUER: Next paragraph down in
10 his e-mail, so it's the very last paragraph on
11 this page.

12 BY MR. SAUER:

13 Q. Your time permitting, I'd like to
14 schedule a meeting to discuss -- or a phone call
15 to discuss, to explore shared interests and
16 alignment of mutual goals regarding the
17 challenge; right?

18 A. Mm-hmm.

19 Q. What's he -- what are these shared
20 interests and alignment of mutual goals?

21 MR. KIRSCHNER: Objection,
22 speculative.

23 BY MR. SAUER:

24 Q. If you know.

25 A. Shared interests regarding

1 countering disinformation in foreign state and
2 non-state propaganda.

3 **Q. And what are your mutual goals with**
4 **the social media companies on that front?**

5 MR. KIRSCHNER: Again, objection,
6 speculative.

7 A. As I stated, sharing our
8 understanding of the tools, techniques, and
9 campaigns of these foreign propaganda and
10 disinformation actors.

11 **Q. Is it a goal of the GEC that those**
12 **foreign disinformation not spread in the United**
13 **States on social media; is that a goal of the**
14 **GEC?**

15 A. The GEC's goals are not related to
16 this space within the United States. The GEC is
17 looking at foreign propaganda and
18 disinformation.

19 **Q. The GEC is not interested in the**
20 **propagation of disinformation in the United**
21 **States; correct?**

22 A. The GEC is focused on the
23 campaigns, the actions, the tools and techniques
24 of foreign propaganda and disinformation actors,
25 like Russia and China.

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1 Q. If you go to the top of this page,
2 there's some other LinkedIn people on this
3 e-mail, Patrick Corrigan; do you see that?

4 A. Yes.

5 Q. Do you know who he is?

6 A. No.

7 Q. Would it surprise you if he's the
8 vice president for legal and digital safety?

9 A. Okay.

10 Q. Yeah, and then Nicole Isaac, is she
11 a trust strategist at LinkedIn?

12 A. I don't know her -- her job title.

13 Q. But it seems like the people at
14 LinkedIn are all members of the trust and safety
15 team, would that be consistent with -- if I may
16 finish the question -- would that be consistent
17 with other meetings that you talked about, where
18 you were meeting with people on their trust and
19 safety teams from these entities?

20 MR. KIRSCHNER: Objection,
21 speculative, and then compound.

22 A. Yes.

23 Q. If you flip to the next page, page
24 343, there's a reference to him setting up a
25 face-to-face meeting in February or March?

1 A. Okay.

2 Q. Do you know if that meeting
3 occurred?

4 A. I don't.

5 Q. Was it -- was it his common
6 practice to have oral face-to-face meetings
7 instead of, you know, kind of written exchanges
8 with -- with the social media platforms?

9 MR. KIRSCHNER: Objection, calls
10 for speculation.

11 BY MR. SAUER:

12 Q. If you know.

13 A. I don't know how, exactly, he
14 conducted his engagement.

15 Q. Turning a couple pages back to page
16 345, Bates page 345, a woman called Diana Patel
17 agrees to the meeting with him on the LinkedIn
18 side; right?

19 MR. KIRSCHNER: Objection, lack of
20 foundation.

21 BY MR. SAUER:

22 Q. If you look there at the top level
23 e-mail on the chain, the top of the page: Hi
24 Sam --

25 A. Okay.

1 Q. -- thanks for reaching out; do you
2 see that?

3 A. Yes, I do.

4 Q. And he was responded to by Diana
5 Patel; correct?

6 A. Yes.

7 Q. What her title, according to the
8 e-mail?

9 A. Head of threat prevention.

10 Q. And under that?

11 A. Trust and safety.

12 Q. So she was the head of threat
13 prevention for the trust and safety team at
14 LinkedIn?

15 MR. KIRSCHNER: Objection,
16 speculative.

17 A. Yes, according to the e-mail.

18 Q. Okay. Can you flip ahead to the
19 page marked 351?

20 A. Mm-hmm.

21 Q. And this is a follow-up e-mail in
22 March that Mr. Stewart sent to the LinkedIn
23 trust and safety team after he had the oral
24 meeting; correct?

25 He says: Hello, Diana, it was nice

1 meeting you and your colleagues recently, at the
2 beginning of the e-mail; correct?

3 MR. KIRSCHNER: Objection,
4 speculative, lack of foundation.

5 A. Yes.

6 Q. And he discussed about being happy
7 to continue the engagement with them; is that
8 right?

9 MR. KIRSCHNER: Again, objection,
10 speculative, lack of foundation.

11 A. Where does it say that?

12 Q. Second sentence of the second
13 paragraph, as mentioned, the GEC has begun
14 sharing information, when appropriate, with
15 companies in the technology industry, and I
16 would be happy to continue the engagement with
17 you; correct?

18 A. Yes.

19 Q. Lower down he gives some links and
20 he links to something called the disinfo-cloud.
21 What's the disinfo-cloud?

22 A. It was an information sharing
23 platform for -- on tools to counter propaganda
24 and disinformation.

25 Q. What sort of tools were discussed

1 on that, are these computer programs or, you
2 know, what kind of tools are we talking about,
3 hammers and chisels?

4 A. No, I believe they were sort of
5 computer analytic tools.

6 Q. What kind of tools?

7 A. I -- I wasn't an active user of the
8 platform, but as I understand it, they were sort
9 of analytical tools.

10 Q. Just help me, as someone who's not
11 super tech savvy, what is an analytical tool?

12 A. Sure.

13 Q. I just don't understand what it
14 means.

15 A. An analytical tool would help -- a
16 tool that could identify coordinated inauthentic
17 activity on a social media platform by a foreign
18 disinformation actor.

19 Q. So did you say it could coordinate
20 inauthentic activity?

21 A. No. No.

22 Q. Okay.

23 A. I said: A tool that could identify
24 coordinated inauthentic activity by a foreign
25 propaganda and disinformation actor, like China

1 or Russia.

2 Q. Yeah, what's coordinated
3 inauthentic activity, is that, like, bots?

4 A. Yeah, it's -- it's -- it's -- it's
5 fake activity that is being coordinated for a
6 purpose.

7 Q. And I think some of your materials
8 talk about how you -- they would create fake
9 accounts of people who don't exist and give
10 them, you know, real looking pictures; is that
11 another example of coordinated fake activity?

12 A. It could be, you'd need to look at
13 the specifics more.

14 Q. Okay. What -- what do the tools do
15 to -- to identify coordinated specific activity?

16 A. I'm not a software expert. I don't
17 know how they work internally.

18 Q. Who was posting on that website or
19 is it a website or what is it, exactly?

20 A. It's a website. It's a -- it's a
21 platform that, as I understand, you can log into
22 and see examples of tools.

23 Q. Okay. And who -- who can log into
24 it, is it open to the public or is it only for
25 social media platforms or how does it work?

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1 A. I believe it was for US government
2 tool developers and I believe some researchers,
3 and it would be not anyone, but you would have
4 to, I think, send in a request and then be
5 approved for -- for -- for access.

6 **Q. It was -- was it a -- a GEC**
7 **initiative?**

8 A. I believe so, yes. Yes.

9 **Q. And was it funded by GEC?**

10 A. I believe so, yes.

11 **Q. Do you know who participated in it,**
12 **who had access to the platform?**

13 A. I don't have the full list of all
14 the participants.

15 **Q. What kinds of participants? I**
16 **think you mentioned earlier there would be tech**
17 **platforms could do that?**

18 MR. KIRSCHNER: Objection,
19 mischaracterizing testimony.

20 A. It was, I believe, tool developers,
21 government agencies, and I believe researchers.
22 I don't have the full -- full list.

23 **Q. And it got discontinued; correct or**
24 **is it still up and running?**

25 A. I -- I don't recall. I believe it

1 was up and running when I left for -- for
2 training.

3 Q. Left for?

4 A. For training in National Defense
5 University.

6 Q. Okay. So you were being trained at
7 National Defense? I thought you were teaching,
8 but you were --

9 A. No, no, no, I was in a master's
10 program there.

11 Q. Oh, congratulations.

12 Okay. Whose team ran the
13 disinfo-cloud or runs it, I guess, if we don't
14 know if it's still up and running.

15 A. The Technology Engagement Team.

16 Q. That's the TET?

17 A. Yes.

18 Q. Can you flip ahead to the last page
19 of the document, 406?

20 A. Mm-hmm.

21 Q. And there is a calendar invite here
22 between Mr. Stewart and a series of recipients
23 on the LinkedIn side; do you see that?

24 A. Yes.

25 Q. And the subject of the meeting is:

1 **LinkedIn and GEC countering disinformation and**
2 **propaganda; correct?**

3 A. Yes.

4 **Q. And it looks like the participants**
5 **in the LinkedIn side are Patrick Corrigan;**
6 **correct?**

7 A. Yes.

8 **Q. And is he the VP of legal and**
9 **digital strategy for LinkedIn?**

10 MR. KIRSCHNER: Objection, lack of
11 foundation, speculative.

12 BY MR. SAUER:

13 **Q. If you know.**

14 A. I don't know his position.

15 **Q. And then Paul Rockwell, the vice**
16 **president of trust and safety, is on there?**

17 MR. KIRSCHNER: Objection, same,
18 speculative, lack of foundation.

19 BY MR. SAUER:

20 **Q. On the line below, if you know?**

21 A. Yes, I see the name.

22 **Q. Ousman Jobe; do you know who that**
23 **is?**

24 A. No, I do not.

25 **Q. Nicole Tarasoff, directly below?**

1 A. What's the question?

2 Q. Oh, do you see her name there?

3 A. Yes.

4 Q. Do you know if she's the director
5 of content policy at LinkedIn?

6 A. I don't know her position.

7 Q. And then there's a bunch of people
8 with state e-mails on this; do you see them
9 there?

10 A. Yes.

11 Q. Without reading their names into
12 the record, do you know who they are?

13 A. I recognize one, two, three of the
14 names.

15 Q. What are their roles in -- in --
16 within state or within GEC?

17 A. As of the date of this e-mail, I
18 was already in National Defense University, so I
19 don't know exactly what their roles were at that
20 time.

21 Q. What are -- what roles did you
22 understand them to have at some time?

23 A. I believe one was on the China
24 team.

25 Q. Which one is that, in terms of

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1 order? I see one --

2 A. I believe it's the first name.

3 Q. Okay. I got you.

4 A. And one, I believe, was on the
5 Russia team.

6 Q. Uh-h8h, and which one is that in
7 the order?

8 A. It is the penultimate name.

9 Q. Okay. And do you recognize the
10 other ones?

11 A. I recognize the second name.

12 Q. What's the role of that person?

13 A. I don't recall the precise role.

14 Q. Okay. Do you know what this
15 meeting is about on July 29th, 2021?

16 A. No.

17 Q. Do you have any -- any reason to
18 think there would be a counter -- countering
19 disinformation meeting on July 29th of 2021?

20 MR. KIRSCHNER: Objection.

21 BY MR. SAUER:

22 Q. And any specific topic that might
23 have come up in that timeframe, anything like
24 that?

25 MR. KIRSCHNER: Objection,

1 speculative.

2 A. I was no longer involved in the
3 day-to-day operations of the Global Engagement
4 Center in -- on July 29th, 2021.

5 MR. SAUER: Can I have M?

6 And so we're handing you what's
7 been marked as Exhibit 10.

8 (Exhibit No. 10 was marked for
9 identification.)

10 BY MR. SAUER:

11 Q. Do you recognize these e-mails, at
12 all, e-mails between people at the State
13 Department and CISA regarding a program for
14 African CSIRTs?

15 A. And what do you mean by recognize?

16 Q. Well, have you seen them before?

17 A. I don't -- I don't believe so. I
18 don't think I was on these e-mails.

19 Q. What's a CSIRT?

20 A. I -- a CSIRT?

21 Q. Do you know what that stands for?

22 If you look at the very first page,
23 in the very first paragraph: We're looking
24 forward to having you speak at the workshop on
25 disinformation and misinformation --

1 A. I'm --

2 Q. -- for African CSIRTs next Tuesday.

3 A. No. There are a lot of acronyms in
4 government. I don't actually recognize this one
5 off the top of my head.

6 Q. Computer security incident response
7 team, is that a -- is that what it stands for,
8 do you think?

9 MR. KIRSCHNER: Objection,
10 speculative.

11 BY MR. SAUER:

12 Q. If you know.

13 A. It sounds plausible.

14 Q. And then the other people, on the
15 state side, participating here, are they members
16 of the GEC, do you know? If you look at that
17 name at the very top, who's sending this e-mail,
18 kind of organizing the conference, is that a GEC
19 person?

20 MR. KIRSCHNER: Objection, assuming
21 evidence not in the record.

22 A. I -- I don't recognize the person
23 who it's from.

24 Q. How about down there in the -- down
25 there in the cc line, second line, far right, I

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1 see Samaruddin K. Stewart?

2 A. Yes.

3 Q. Yeah, at that time he was still a
4 GEC person; fair to say?

5 A. Yes. Yes.

6 Q. Is he gone now?

7 A. I believe so, yes.

8 Q. Okay. And then directly below him,
9 there's another state person; is that a person
10 associated with GEC?

11 A. I -- I don't know.

12 Q. Were you familiar with this or do
13 you recall this particular program?

14 A. I -- I don't recall this particular
15 program.

16 Q. And I guess that we've been talking
17 about in May of 2021, were you at GEC then or
18 were you at National Defense University?

19 A. I was still at GEC in May.

20 Q. Okay. Third page of this --

21 A. Mm-hmm.

22 Q. -- if you go to the bottom of the
23 page, it's the one marked 12/1/96; do you see
24 that?

25 A. Yes.

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1 Q. There's a personnel state there who
2 I think was the original sender on the first
3 page; is that a name -- I take it that's a name
4 you do not recognize?

5 A. No, I don't.

6 Q. So you do not know if she's
7 associated with GEC?

8 MR. KIRSCHNER: Objection, asked
9 and answered.

10 A. No.

11 Q. And --

12 MR. KIRSCHNER: Clarify the record,
13 he's saying -- just -- because he said no on
14 that question is he does not know, not that
15 the -- the person is not -- I just thought for
16 all our purposes it was a little bit of --

17 BY MR. SAUER:

18 Q. Do you know whether that person is
19 associated with the GEC?

20 A. I do not know whether that person
21 is associated with the GEC.

22 Q. Just looking at what she wrote
23 here, on May 10th: Hello all, one more set of
24 answers from participants, these in response to
25 the question: What topics do you hope the

1 workshop will cover; correct?

2 A. Okay.

3 Q. And if you go down to the bottom
4 bullet point on this page, if you go to the top
5 one it's about how to combat mis- and
6 disinformation; correct?

7 A. Yes, that's WHAT it says.

8 Q. And how to mitigate it once viral;
9 correct?

10 A. Yes.

11 Q. Bottom -- bottom bullet point,
12 there, says: Slow response to incidences
13 escalated to service providers; right?

14 A. That's what it says.

15 Q. So that's an expression of concern
16 that the service providers aren't responding
17 when people are raising concerns about content
18 on their platforms?

19 MR. KIRSCHNER: Objection,
20 speculative.

21 BY MR. SAUER:

22 Q. Is that what it seems to say?

23 A. I don't see a reference to content.

24 Q. So what incidences might be
25 escalated to service providers that don't relate

1 to content on their platforms?

2 MR. KIRSCHNER: Objection,
3 hypothetical and speculative.

4 BY MR. SAUER:

5 Q. You may answer.

6 A. Slow connectivity, malfunctions on
7 the platform, any number of things. I don't see
8 any reference to specify what type of incidents,
9 here.

10 Q. Okay. Can you turn to the next
11 page?

12 There's a reference there at the
13 top bullet point to fact checking techniques and
14 how to identify disinformation and
15 misinformation; correct?

16 A. Yes.

17 Q. Does GEC work with any
18 fact-checking organizations?

19 A. Yes, I believe it does.

20 Q. What -- what does it do? What sort
21 of work does it do with fact-checking
22 organizations?

23 A. I believe the GEC has supported
24 fact-checking organizations outside of the
25 United States.

1 **Q. Has the GEC ever supported**
2 **fact-checking organizations inside the United**
3 **States?**

4 A. I don't believe so.

5 **Q. Has the GEC ever worked with**
6 **fact-checking organizations that are used as**
7 **fact-checkers by social media platforms, like**
8 **Twitter, Facebook, Google and so forth?**

9 MR. KIRSCHNER: Objection, vague.

10 A. What do you mean by used by?

11 **Q. Well, do the social media platforms**
12 **consult with the fact checkers on their own?**

13 MR. KIRSCHNER: Objection,
14 speculative.

15 A. I don't know what the social media
16 companies do with fact-checkers.

17 **Q. What fact-checkers do you work**
18 **with?**

19 A. I believe the Pointer Institute is
20 the only one I recall. I don't recall the --
21 the specific organizations.

22 **Q. Where is that? Where is that**
23 **located?**

24 A. I don't recall.

25 **Q. Is that a foreign or domestic**

1 **fact-checking organization?**

2 A. I don't -- I don't recall. I don't
3 recall anything beyond the name.

4 **Q. Okay. How do you remember that?**

5 **In what connection do you remember that name?**

6 A. I remember it coming up in either a
7 meeting or a document. I don't remember the
8 specific context.

9 **Q. Do you remember how GEC works with**
10 **them?**

11 A. No, I don't remember the specifics.

12 **Q. Do you have any understanding of**
13 **how GEC works with fact-checking organizations,**
14 **in general?**

15 A. I believe it would be identifying
16 an organization that works in a location where a
17 foreign propaganda disinformation actor, like
18 Russia or China, would be active and supporting
19 them in some fashion.

20 **Q. What kind of fashion?**

21 A. Support could range from a grant or
22 a financial support to information sharing or
23 training in tools and techniques.

24 **Q. Okay. So information sharing,**
25 **would that be identifying narratives and things**

1 **like that, that they should be aware of?**

2 A. I -- I don't know what the
3 specific, you know, information sharing would
4 be.

5 **Q. So you don't know what kind of**
6 **information would be shared between GEC and**
7 **international fact-checking organizations or any**
8 **fact-checking organization; fair to say?**

9 A. No. I wasn't involved in the
10 direct back and forth, so I can't speak to
11 the -- to the specifics.

12 **Q. Who was involved on GEC's side, by**
13 **title?**

14 A. I don't know.

15 **Q. Do you know what team would have**
16 **engaged -- engages with fact-checking**
17 **organizations?**

18 A. It would have been one of the three
19 nation-state focus teams, so probably the
20 Russian, China, or Iran team.

21 **Q. Next bullet point down, second one**
22 **on the page: Proven techniques to take down**
23 **these articles. Does that, in the effectiveness**
24 **of fake news checkers, right, so the topics**
25 **being raised by this State Department person for**

1 **discussion from, I take it, the CSIRT**
2 **participants about how to take down these**
3 **articles relating to misinformation and**
4 **disinformation; correct?**

5 MR. KIRSCHNER: Objection,
6 mischaracterizes. Well, lack of foundation and
7 assumes evidence not in the record and
8 mischaracterizes document.

9 BY MR. SAUER:

10 **Q. Is that what it says?**

11 A. Yes, that's what it says.

12 **Q. Okay. And does GEC -- you talk a**
13 **lot about tools and techniques, does GEC have**
14 **information about how to take down -- techniques**
15 **to take down these articles?**

16 A. No, not generally, the GEC doesn't
17 flag and take things down.

18 **Q. Do you know what this state**
19 **official is referring to when she talks about**
20 **proven techniques to take down these articles?**

21 A. No.

22 MR. KIRSCHNER: Objection,
23 speculative.

24 A. No, I don't -- I don't see the
25 context.

1 Q. Okay. Lower on down there,
2 international takedown requests, three bullet
3 points down; correct?

4 A. Yes, I see that.

5 Q. Do you know what that refers to?

6 A. I don't see the additional -- any
7 additional context here.

8 Q. So you don't know what -- are
9 you -- are you aware of there being
10 international -- international takedown requests
11 presented to social media platforms?

12 A. I'm aware that international
13 governments would sometimes reach out with
14 requests. I know that it's an issue. It's not
15 one that generally involve the GEC.

16 Q. What are -- what are international
17 governments?

18 A. Government of any other country.

19 Q. Okay. So a government of a foreign
20 country?

21 A. A foreign government might reach
22 out to a social media company.

23 Q. And ask them to take something
24 down?

25 A. Yes.

1 Q. But you're saying GEC doesn't do
2 that?

3 A. No. No. That's what I believe
4 this refers to, international takedown requests.
5 So a request from a foreign government to a
6 social media company to -- to remove something.

7 MR. SAUER: Can you give me N?

8 I think this is going to be Exhibit
9 11 that you're being handed.

10 (Exhibit No. 11 was marked for
11 identification.)

12 BY MR. SAUER:

13 Q. Do you have Exhibit 11 in front of
14 you?

15 A. I do.

16 Q. And this is an e-mail chain or
17 actually it's against multiple e-mail chains,
18 involving CISA and the GEC, from 2020; correct?

19 A. Yes.

20 Q. Okay. The bottom of the first
21 page, you see there's an e-mail from a state
22 official called Alex Dempsey; do you see that?

23 A. I do.

24 Q. Who's Alex Dempsey?

25 A. I believe he's on the I2C2 team, so

1 the interagency coordination cell.

2 Q. So he's a GEC official? Sorry --

3 A. Yes, yes, I believe he's a member
4 of the GEC.

5 Q. And if you flip to the second page,
6 it looks like he has flagged a, quote, disinfo
7 campaign on YouTube targeting a DS officer;
8 what's a DS officer, do you know?

9 A. I believe it would be diplomatic
10 security.

11 Q. What's a diplomatic security
12 officer?

13 A. A member of the Diplomatic Security
14 Office of the State Department.

15 Q. So would that be somebody working
16 in an embassy abroad or here in Washington,
17 D.C.?

18 A. It could be either.

19 Q. But it's a state employee of some
20 kind?

21 A. Yes.

22 Q. And is involved -- says: Claiming
23 she brought COVID-19 to something in an athletic
24 competition; right?

25 A. Right.

1 Q. Yeah, and without mentioning this
2 person's name, he identifies, who, what, when,
3 where, and why; right?

4 MR. KIRSCHNER: Objection, vague,
5 assuming evidence not in the record.

6 BY MR. SAUER:

7 Q. Well, I'm just reading, who, what,
8 when, where and why, from Mr. Dempsey's e-mail;
9 do you see that?

10 A. Yes, I do.

11 MR. KIRSCHNER: I don't see the
12 why.

13 A. I see, who, what, when, where and
14 why, yes.

15 Q. Okay. And then the where is
16 online, and he links a YouTube video?

17 A. Yes.

18 Q. And what is a targeted
19 disinformation campaign against a state
20 official; correct?

21 A. Yes.

22 Q. And then, down there in the why, it
23 talks about there's a false narrative being
24 pushed online about this person, and there's a
25 YouTube channel run by Americans falsely

1 claiming that she is, quote, patient zero, and
2 that as a US army reservist she brought COVID-19
3 to Wuhan during an athletic competition;
4 correct?

5 A. Yes.

6 Q. Is there a theory out there that
7 COVID-19 originated or spread at an
8 international athletic competition in Wuhan
9 during the fall of 2019?

10 A. Apparently, according to the -- to
11 the -- to the information here.

12 Q. Okay. And so Mr. Dempsey, of the
13 GEC, forwarded this to CISA; right? Do you know
14 who Robert Schaul is?

15 A. No.

16 Q. He's called Rob.

17 A. No.

18 Q. Do you know who Brian Scully is?

19 A. I believe Brian Scully was either
20 at or was the head of the disinformation office
21 at CISA.

22 Q. That's what we've described earlier
23 as the mis-dis- and mal information team?

24 A. Right. The -- it was initially, I
25 think, a task force, and it was subsequently

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1 renamed as the mis-dis- and mal information
2 team.

3 Q. And Brian Scully here, about a
4 third of the way down the first page, has a
5 CISA.DHS.gov e-mail address; correct?

6 A. Yes, correct.

7 Q. So Alex Dempsey's e-mail is taken
8 by Brian Scully, at CISA, and forwarded to two
9 Facebook officials; correct?

10 A. Yes.

11 Q. They have FB.com e-mails there?

12 A. Yes.

13 Q. And Scully says to these two
14 officials: Please see the below reporting from
15 our State Department GEC colleagues, Global
16 Engagement Center colleagues, that's your unit;
17 right?

18 A. Yes, that's the Global Engagement
19 Center.

20 Q. Okay. About a disinformation on
21 YouTube targeting a diplomatic security officer;
22 correct?

23 A. Yes.

24 Q. And then one of the Facebook
25 officials responds, and says: Thank you so much

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1 **for this. Have flagged for our internal teams;**
2 **correct?**

3 A. Yes.

4 Q. And so this was a -- a report from
5 **the GEC to CISA about a disinformation campaign**
6 **run by Americans; correct?**

7 MR. KIRSCHNER: Objection, lack of
8 foundation, speculative.

9 BY MR. SAUER:

10 Q. According to the -- according to
11 **the bold paragraph Y on the second page?**

12 MR. KIRSCHNER: Again, objection,
13 lack of foundation.

14 A. It says here that the channel is
15 run by Americans. I don't know about the
16 campaign.

17 Q. So it's the content that he's
18 **complaining about is on a channel, a YouTube**
19 **channel, run by Americans; correct?**

20 A. That's what the e-mail says, yes.

21 Q. And this gets sent to CISA, who
22 **forwards it onto Facebook, who says: We have**
23 **flagged this for our internal teams; correct?**

24 MR. KIRSCHNER: Objection,
25 speculative, lack of foundation.

1 BY MR. SAUER:

2 Q. Is that what the e-mail says?

3 A. The e-mail went from the Global
4 Engagement Center to CISA to Facebook.

5 Q. Okay. And CISA described itself on
6 its website as, quote, routing disinformation
7 concerns to social media platforms?

8 MR. KIRSCHNER: Objection,
9 speculative.

10 A. I don't know how they describe
11 themselves on their website.

12 Q. Were you aware of this incident
13 when it happened?

14 A. I don't -- I believe I was aware of
15 the YouTube video. I don't know that I was
16 aware or on the e-mails here. I -- I do recall
17 the disinformation involving a diplomatic
18 security officer. I do recall that.

19 Q. And this incident in 2020 is
20 different than the 2018 incident you described
21 this morning, where you discussed there was a
22 threat to the life of someone abroad; right?

23 A. They are separate incidents.

24 Q. Yeah, this is two years later, it's
25 a completely different incident.

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1 A. Completely different.

2 Q. Were you aware -- what was your
3 knowledge of this incident when it happened?
4 Did they ask you for authority to flag this for
5 CISA or did you hear about it afterwards? What
6 was your knowledge at the time?

7 A. I believe I was aware that there
8 was a disinformation campaign involving a
9 diplomatic security officer. I don't see myself
10 on these e-mails, and I don't recall whether I
11 was in the internal discussion that led to this
12 chain.

13 Q. Did you authorize anyone to raise
14 this with CISA so that they could flag it for a
15 social media platforms?

16 A. I don't -- I don't recall that.

17 Q. Do you know one way or the other
18 whether you did that?

19 A. I -- I -- I don't recall.

20 Q. If you flip ahead through this
21 e-mail chain --

22 A. Mm-hmm.

23 Q. -- see the next page, 7671.

24 A. Okay. Mm-hmm.

25 Q. Scully, at CISA, takes the same

1 e-mail chain and forwards it onto Twitter, as
2 well; correct?

3 MR. KIRSCHNER: Objection, lack of
4 foundation.

5 A. I -- I see that here.

6 Q. Yeah, and -- and Twitter just
7 responds: Thank you, Brian; correct?

8 A. Yes.

9 Q. Then flip ahead to page 7675.

10 A. Okay.

11 Q. This is the Alex Dempsey e-mail
12 raising this, who what. When, where, and why,
13 is forwarded by Scully onto Google, as well;
14 right?

15 MR. KIRSCHNER: Again, objection,
16 lack of foundation.

17 BY MR. SAUER:

18 Q. The top of the page, without
19 mentioning the name, it's Brian Scully is
20 forwarding this Alex Dempsey e-mail to a third
21 social media platform, someone with a Google.com
22 e-mail address; correct?

23 A. Yes.

24 Q. And that cover page, it says:
25 Please see below, reporting from colleagues at

1 the State Department, Global Engagement Center,
2 about disinformation on YouTube regarding a
3 diplomatic security officer; correct?

4 A. Yes.

5 Q. And then it goes on to say: It
6 does appear the FBI has been notified --
7 notified, so you may also have heard from them;
8 correct?

9 A. Yes.

10 Q. Was this incident -- did the GEC
11 notify the FBI of this incident?

12 MR. KIRSCHNER: Object. Go on.

13 A. I don't know.

14 Q. Do you remember that, at all?

15 A. I -- I don't recall.

16 Q. You don't remember any discussions
17 with the FBI? I know you say you remember this
18 incident, at some level. Do you remember any
19 interaction with the FBI relating to it?

20 A. I remember the incident. I don't
21 recall which interagency entities were
22 contacted.

23 Q. Okay. Some were, though, obviously
24 CISA?

25 MR. KIRSCHNER: Objection,

1 mischaracterizing testimony.

2 BY MR. SAUER:

3 Q. Yes or no?

4 A. I'm seeing these e-mails, but I
5 wasn't on these e-mails.

6 Q. And you don't remember them?

7 A. I wasn't on these e-mails.

8 Q. Do you -- did you authorize the
9 sending of e-mails like this, with respect to
10 this incident?

11 A. I don't --

12 MR. KIRSCHNER: Object. I was
13 going to say, objection, asked and answered.

14 BY MR. SAUER:

15 Q. If you know.

16 A. I don't recall.

17 Q. Looking down here at the bottom of
18 this page, it's another copy of the same Alex
19 Dempsey e-mail to Rob Schaul. I can't remember
20 if you said, do you know who Rob Schaul is?

21 A. No, I do not.

22 Q. And he says: Rob, our leadership
23 has asked that we share the below information
24 with our IA counterparts; right?

25 A. Yes.

1 Q. What's -- who's our leadership, do
2 you know?

3 A. Under the why, I see listed:
4 Special envoy, Lea Gabrielle, who would have
5 been the highest ranking official in the office
6 at that time. So if she authorized it my
7 authorization wouldn't be necessary.

8 Q. Okay. Do you know if Lea
9 Gabrielle -- I think you testified about her
10 earlier -- you would have been reporting
11 directly to her, at this time; right?

12 A. Yes.

13 Q. So we're talking about March 25th,
14 2020, she was the acting coordinator?

15 A. She was the appointed coordinator.
16 She was not acting, she was the coordinator.

17 Q. And you were principal deputy
18 coordinator at the time?

19 A. Yes.

20 Q. And as you say, it looks like Lea
21 Gabrielle -- in other words, you interpreted --
22 let me ask you this, and I don't know what you
23 interpret -- what do you remember? Do you
24 remember Lea Gabrielle authorizing people to
25 flag this for CISA and the FBI?

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1 A. I do not know.

2 Q. And you don't know who,
3 specifically, our leadership is, do you?

4 A. I don't know what "our leadership"
5 refers to here. Down under the why it refers to
6 special envoy, Lea Gabrielle.

7 Q. Here in the first sentence, could
8 that be you or you don't remember?

9 A. It could be, it doesn't specify
10 what "our leadership" means.

11 Q. And you don't remember whether you
12 made any authorization about this?

13 A. I don't.

14 Q. And that later made sense, it talks
15 about share them with our IA counterparts; do
16 you know what IA stands for?

17 A. Interagency.

18 Q. Okay. Are you aware of any other
19 situations where anyone at the GEC flagged
20 content on a YouTube channel run by Americans to
21 CISA or a social media platform or the FBI as a
22 disinformation campaign to be combatted?

23 A. No, I'm not.

24 Q. This is the only incident that you
25 can recall at this time?

1 MR. KIRSCHNER: Objection,
2 mischaracterizing testimony.

3 A. I'm seeing this in these e-mails,
4 but I wasn't on these e-mails. I recall the --
5 the video and the campaign. I don't recall
6 the -- the interagency communications here.

7 Q. That whole campaign about the virus
8 being spread at an international athletic
9 competition in Wuhan, was that one of the
10 China-related false narratives you talked about
11 earlier?

12 A. I believe it was a minor, like, a
13 sub-narrative, because it involved, like, an
14 athletic competition. But it wasn't one of the
15 major narratives.

16 Q. How about as -- was it a Russian
17 narrative?

18 A. I don't recall it as a Russian
19 narrative.

20 Q. You don't recall it as a major
21 Chinese narrative or a Russian narrative?

22 MR. KIRSCHNER: Objection,
23 mischaracterizes testimony.

24 A. I don't recall it as this. I
25 recall it as a minor narrative.

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1 Q. Have you ever heard of the Election
2 Integrity Partnership?

3 A. Yes.

4 Q. What is that?

5 A. I -- I don't recall the exact
6 specifics of -- of what it was.

7 Q. What have you heard about it?

8 A. I read the section in the
9 complaint.

10 Q. Independent of the complaint, do
11 you have any knowledge of the Election Integrity
12 Partnership?

13 A. Independent of the complaint, I
14 recall that it was an entity that someone at the
15 GEC was in contact with, that's -- that's --
16 that's the extent.

17 Q. Who was -- who at the GEC was in
18 contact with it?

19 A. I believe -- I believe it was -- I
20 believe it was a member of the Russia team.
21 I -- I think it may have been George Beebe on
22 the Russia -- George Beebe on the Russia team.

23 Q. How do you spell Beebe?

24 A. B-e-e-b-e.

25 Q. B-e-e-b-e, first name George?

1 A. George.

2 Q. **G-e-o-r-g-e?**

3 A. Right.

4 Q. **What makes you think it was him?**

5 A. I seem to remember he was the
6 individual who -- who -- who was engaged with
7 the -- what did you call it, the Election
8 Integrity Partnership, right?

9 Q. **Yes.**

10 A. Okay.

11 Q. **I'll call it the EIP from now on.**

12 A. Okay.

13 Q. **You remember that he was engaged in
14 that, how did you know that? How did you know
15 he was engaged in that?**

16 A. I think it was sort of reported at
17 a meeting. I don't recall the exact context.

18 Q. **Do you know who authorized him to
19 be involved in it?**

20 A. No, I don't know who -- who -- who
21 authorized it.

22 Q. **Do you know what the nature of his
23 involvement was, like, what did he do with
24 respect to the EIP?**

25 A. No. I know he had some

1 communication with him. I don't know the
2 specifics of his involvement.

3 Q. Okay. Do you know what the EIP
4 was?

5 A. Only broadly, that it was a
6 partnership to counter, I think, our -- our --
7 our involvement would have been foreign
8 propaganda and disinformation focused on the
9 election or elections. I don't recall.

10 Q. Do you know what Mr. Beebe or
11 whoever it was -- I take it you think it was
12 Mr. Beebe, but you're not sure?

13 A. I think it was him, but I'm not
14 sure.

15 Q. Okay. Whoever it was involved,
16 your understanding is they would be involved in
17 flagging foreign disinformation relating to the
18 election?

19 MR. KIRSCHNER: Objection, assuming
20 evidence not in the record, mischaracterizes
21 testimony.

22 A. I -- I -- I don't recall the exact
23 nature of their involvement.

24 Q. Okay. So you -- earlier, when you
25 said: Our involvement would have been --

1 A. Right.

2 Q. -- flagging foreign disinformation
3 or raising foreign disinformation concerns,
4 what's your basis for that?

5 A. I said: Our involvement would have
6 been related to foreign propaganda.

7 Q. Okay.

8 A. And the basis for that is the GEC's
9 mandate.

10 Q. In other words, that's what the GEC
11 does, generally, but you don't have any specific
12 knowledge with respect to what Mr. Beebe did?

13 A. No, I don't recall anything
14 specific about what he did.

15 Q. Do you know who authorized the GEC
16 to be involved in the EIP, at all?

17 MR. KIRSCHNER: Objection, assumes
18 evidence not in the record.

19 A. I don't.

20 Q. Did someone authorize it or did
21 Mr. Beebe just kind of do it on his own?

22 A. I don't recall who -- who
23 authorized it.

24 Q. Yeah, okay.

25 MR. SAUER: Can I have P?

1 This is going to be, I think,
2 Exhibit 12. Is that right, 12?

3 (Exhibit 12 was marked for
4 identification.)

5 MR. KIRSCHNER: Mr. Sauer, just --
6 the water's now starting to drip towards the
7 table. Do you want to take a two-minute break
8 to wipe off the --

9 MR. SAUER: That didn't work very
10 well.

11 MR. KIRSCHNER: We can get a
12 napkin. I won't put this one in my manilla
13 folder.

14 MR. SAUER: You should have rubber
15 bands.

16 MR. KIRSCHNER: We're going to ask
17 the witness to read the entire document, and
18 that will be the seven hours.

19 I'm joking, but I do want to allow
20 the witness, when you have something -- when you
21 have something that you're asking, specifically,
22 to have -- allow the witness to have sufficient
23 time to understand the context.

24 MR. SAUER: That's okay, only a few
25 pages that are --

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1 MR. KIRSCHNER: Okay.

2 BY MR. SAUER:

3 Q. Have you seen this report before?

4 A. I believe I've seen the cover of
5 it.

6 Q. Okay. In what connection did you
7 see the cover of it?

8 A. It may have been a news thing. I
9 don't recall the exact context.

10 Q. Was it in context of a GEC meeting
11 or was it just, you know, seeing it somewhere
12 else?

13 A. It could have been both.

14 Q. Okay. You just don't remember?

15 A. I don't. I think I did see media
16 coverage, and it may also have come up at a GEC
17 meeting.

18 Q. And is this the report that the EIP
19 did about its activities in 2020, with respect
20 to disinformation on social media?

21 A. Yes, that's what it appears to be.

22 Q. It's quite a lengthy report, about
23 292 pages; fair to say?

24 A. Yes.

25 Q. Before today, have you read any of

1 **this?**

2 A. I had glanced at the -- I think the
3 executive summary.

4 **Q. When did you do that?**

5 A. I don't recall. I think it may
6 have been when it came out, but I don't recall
7 exactly.

8 **Q. And when it came out, I think, is**
9 **that identified on the second page or this only**
10 **says 2021, third page, I think it says it came**
11 **out in June 15th, 2021?**

12 A. June 15th, 2021.

13 **Q. Do you think you looked at it at**
14 **that time?**

15 A. Or maybe after that, that was
16 almost exactly when I was leaving the Global
17 Engagement Center.

18 **Q. Did you look at it more recently,**
19 **like, for example, before your testimony today?**

20 A. I think I looked at the -- the --
21 the -- like the front, the cover.

22 **Q. The cover?**

23 A. Yeah.

24 **Q. You may have --**

25 A. I did not read the whole report. I

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1 did not read the whole report.

2 Q. Well, let me -- let me kind of walk
3 you through some questions, and obviously if you
4 haven't read it before, you know, if you don't
5 know the answer, if you don't know, let me know.

6 But just -- can you go to page V,
7 the first page of the executive summary, little
8 Roman five.

9 A. Okay.

10 Q. There's a -- in the bottom
11 paragraph there, there's a statement that the
12 EIP -- this is the EIP talking about its own
13 activities, quote, bridge the gap between
14 government and civil society, end quote, help to
15 strengthen platform standards for combatting an
16 election-related misinformation.

17 Do you know -- do you have any
18 knowledge of helping strengthen platform
19 standards for combatting disinformation?

20 MR. KIRSCHNER: Objection, vague.

21 BY MR. SAUER:

22 Q. Do you know what they're talking
23 about there?

24 A. No. I'm not going to -- I -- I --
25 I can't interpret beyond the words here. I

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1 don't know.

2 Q. Okay. Higher up in the page, it
3 says: Dozens of federal agencies support this
4 effort, including CISA. Do you know if CISA's
5 involved in the EIP?

6 MR. KIRSCHNER: Objection,
7 speculative.

8 BY MR. SAUER:

9 Q. If you know.

10 A. I don't know any of the specifics
11 of CISA's involvement with the EIP.

12 Q. Next page, page little Roman six,
13 at the very top, it talks about how the EIP was
14 formed to enable realtime information exchange
15 between election officials, government agencies,
16 and others, including social media platforms;
17 correct?

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

19 Q. Do you know of any other
20 arrangements for realtime information exchange
21 between government agencies and social media
22 platforms?

23 A. What -- what -- could you -- could
24 you be more specific?

25 Q. Well, can you think of anything

1 that you would describe as a realtime
2 information exchange between government
3 officials and social media platforms, any
4 arrangement?

5 A. Well, what do you mean by realtime?

6 Q. Well, stuff that's -- anything that
7 raises concerns as they're occurring on social
8 media?

9 A. I'm not aware of any standing
10 arrangement like that at the GEC. I can't speak
11 to other parts of government.

12 Q. At the bottom of this page, there's
13 bullet points, you see there's four bullet
14 points there, and the last one is:
15 Delegitimization of election results; do you see
16 that?

17 A. Yes.

18 Q. It talks about content aiming to
19 delegitimize election results on the basis of
20 false or misleading claims; right?

21 A. Yes.

22 Q. Are you aware of Mr. Beebe raising
23 concerns about delegitimization of election
24 results?

25 A. No, I don't -- no, I'm not aware.

1 Q. Or anyone else at GEC raising those
2 kinds of concerns to the EIP?

3 MR. KIRSCHNER: Objection, lack of
4 foundation.

5 A. No, I'm not aware of any of the
6 specifics of interactions between GEC members
7 and the EIP.

8 Q. Next paragraph down, last line of
9 the page, it says: Of the tickets we, the EIP,
10 processed 72 percent were related to
11 delegitimization of the election; correct?

12 A. That's what it says.

13 Q. So it sounds like it was processing
14 complaints that had to do with attacking the
15 legitimacy of the 2020 election?

16 MR. KIRSCHNER: Objection, lack of
17 foundation.

18 A. That's what it says here, yes.

19 MR. KIRSCHNER: John, we've been --
20 Mr. Sauer, we've been going over an hour, so we
21 should take a break sometime soon.

22 MR. SAUER: That's fine with me.

23 THE WITNESS: Yeah, let's take a --

24 MR. SAUER: That's fine. If the
25 witness wants a break, we can do it.

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1 Can we keep it at five minutes or
2 so?

3 MR. KIRSCHNER: Yeah.

4 MR. SAUER: Let's keep moving
5 forward.

6 THE VIDEOGRAPHER: The time is 2:31
7 p.m. We are off the record.

8 (Recess.)

9 THE VIDEOGRAPHER: The time is 2:40
10 p.m. We're back on the record. Please proceed.

11 BY MR. SAUER:

12 Q. Still in Exhibit 12, can you flip
13 ahead to page XI little Roman 11.

14 A. Okay.

15 Q. Do you see there's a note there
16 that lists about 15 social media platforms?

17 A. Yes.

18 Q. Eyeballing that list, are you aware
19 of anyone from the GEC interacting with anyone
20 from any of those social media platforms in
21 connection with the EIP?

22 MR. KIRSCHNER: Objection, lack of
23 foundation, speculative.

24 A. I'm not aware of any specific GEC
25 interactions related both to the EIP and the

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1 platforms listed here.

2 Q. Okay. So you anticipate my next
3 question is: You don't know of anyone at GEC
4 reaching out to EIP in connection with any of
5 these platforms; fair to say?

6 A. I -- I don't have any information
7 about anyone at the GEC reaching out to these
8 platforms in connection with the EIP.

9 Q. Do you have any specific
10 information about GEC's involvement in the EIP?

11 A. Not that I recall. I recall a
12 general engagement with the EIP. I don't recall
13 the specifics of it.

14 Q. Do you recall anything other than
15 the fact that there was a general engagement
16 with the EIP?

17 A. No. I recall the GEC was engaging
18 with the partnership, but I don't -- I don't
19 recall any specifics.

20 Q. And do you know -- I know you
21 mentioned Mr. Beebe?

22 A. Right.

23 Q. Do you know if there was more than
24 one person or whether it was just one person?

25 A. I remember his name in connection

1 with it, and we also had an individual who --
2 who liaised on election-related issues, but I
3 don't recall whether she engaged with the EIP.

4 **Q. Who -- what was her name?**

5 A. Her name was Adele Ruppe.

6 **Q. And is she still there at the GEC?**

7 A. No.

8 **Q. Why did she -- why did she engage**
9 **on election issues? You said she engaged on**
10 **election issues, tell us what that involves?**

11 A. She would attend interagency
12 meetings on safeguarding the security of the
13 elections.

14 **Q. Okay. And what agencies did she**
15 **meet with?**

16 A. I -- I don't recall, it would be
17 probably the full range of national security
18 agencies.

19 **Q. And you say she attended**
20 **interagency meetings on safeguarding the**
21 **security of elections. Were those American**
22 **elections, specifically?**

23 A. Yes, I believe so.

24 **Q. So we're not talking about**
25 **elections in foreign countries. She was on**

1 meetings that discussed safeguarding the
2 security of American elections; is that right?

3 A. Yes, I believe so.

4 Q. And -- and you think she may have
5 had some connection or involvement with the EIP?

6 MR. KIRSCHNER: Objection,
7 mischaracterizes testimony.

8 A. I -- I simply don't know.

9 Q. You don't know? How did -- and
10 maybe I'm just forgetting. How did -- why did
11 you bring up her name just now, because you
12 thought she might have had that interaction?

13 A. Because she was the other -- she
14 was the GEC person who held the portfolio on
15 election security-related issues.

16 Q. Okay. What else was involved in
17 that portfolio, the election security portfolio
18 for GEC, other than going to interagency
19 meetings with other federal agencies?

20 A. I believe it was almost entirely
21 focused on interagency meetings.

22 Q. Do you know if she raised concerns
23 about election security in those meetings or did
24 she merely listen?

25 MR. KIRSCHNER: Objection,

1 speculative.

2 BY MR. SAUER:

3 Q. If you know.

4 A. I don't know the exact nature of
5 her interactions in those meetings.

6 Q. What other activities, if any, does
7 the GEC conduct with respect to election
8 security?

9 MR. KIRSCHNER: Objection, vague,
10 ambiguous.

11 A. The GEC, as I recall, was primarily
12 in listening mode, on occasion it might discuss,
13 you know, general Russian or Chinese or other,
14 you know, foreign disinformation actors. And as
15 I've noted, the narratives are the tools and
16 techniques that they use.

17 Q. And would those be narratives,
18 tools and techniques that relate to kind of
19 destabilizing or disrupting American domestic
20 elections?

21 MR. KIRSCHNER: Objection.

22 BY MR. SAUER:

23 Q. If you know.

24 A. I don't recall any specific
25 narratives.

1 Q. Okay. And you don't know whether
2 that individual with the election security
3 portfolio for GEC had any direct involvement
4 with the EIP?

5 A. I don't, no.

6 Q. But you think that she may have
7 because of the nature -- just because of the
8 nature of her portfolio, this was
9 election-related, she was the election person,
10 therefore, she may have been involved in this?

11 A. Yes, that's possible.

12 Q. Next page, XII little Roman 12.

13 A. Mm-hmm.

14 Q. List of contributors at the very
15 bottom, it says that the EIP would like to thank
16 Matthew Masterson; do you know who he is?

17 A. No, I don't.

18 Q. Have you ever heard that name
19 before, to your recollection?

20 A. I don't know. Is he listed in the
21 complaint? I don't -- I don't -- I don't really
22 know.

23 Q. Okay. I was just curious if you
24 know.

25 A. No. No idea.

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1 Q. Okay. Next page, XIII, little
2 Roman 13. There's acknowledgments which are
3 basically thanking the people who funded the
4 EIP.

5 A. Mm-hmm.

6 Q. Do you know who funded the EIP?

7 A. No, I don't.

8 Q. Okay. And there's four -- four
9 entities involved in it; were you aware of that,
10 that are listed here?

11 MR. KIRSCHNER: Can you point us to
12 where you're referring to?

13 BY MR. SAUER:

14 Q. Digital Research Forensic Lab of
15 the Atlantic Council, in bold, Graphika, in
16 bold, Stanford Internet Observatory, in bold,
17 and university of Washington Center For an
18 Informed Public, in bold; do you see those four
19 entities?

20 MR. KIRSCHNER: All right.

21 A. Yes.

22 Q. Were you aware that they were
23 involved in the EIP?

24 A. I'm only seeing this here, I
25 don't -- I don't recall who was involved in the

1 EIP.

2 Q. Okay. Well, then, down at the
3 bottom of the page, last sentence, third line
4 from the bottom, researchers who contributed to
5 the EIP also received partial support from the
6 US National Science Foundation; correct?

7 A. I -- I see that in here.

8 Q. So that's government funding, at
9 least in part, for the EIP; correct?

10 MR. KIRSCHNER: Objection, lack of
11 foundation.

12 BY MR. SAUER:

13 Q. Is that what it says?

14 MR. KIRSCHNER: Speculation.

15 A. I see what it -- that's what it
16 says here, yes.

17 Q. Were you aware of -- are you aware
18 of government funding for the EIP from any other
19 source?

20 A. No.

21 Q. Are you aware of government funding
22 for the EIP from any State Department source?

23 A. No.

24 Q. Are you aware of government funding
25 or support for the EIP from anyone at CISA?

1 A. No.

2 Q. Generally speaking, you -- you
3 don't know who funded it, essentially; is that
4 fair to say?

5 A. Yes, I don't know.

6 Q. Were there ever any discussions at
7 State about funding it or supporting it, that
8 you recall?

9 A. I don't recall any discussions
10 about funding or supporting it.

11 Q. If you flip ahead a few pages, to
12 Arabic page 2, do you see at the beginning of
13 the second full paragraph, where it says: The
14 initial idea?

15 A. Mm-hmm.

16 Q. The initial idea for the
17 partnership, that's the EIP, came from four
18 students that the Stanford Internet Observatory
19 funded to complete volunteer internships at CISA
20 at the Department of Homeland Security; correct?

21 MR. KIRSCHNER: Objection, lack of
22 foundation.

23 BY MR. SAUER:

24 Q. Is that what it says?

25 A. I see that, yes, that's what it

1 says.

2 Q. Okay. And then, were you aware of
3 CISA interns originating the idea for this EIP?

4 A. No, I was not.

5 Q. Were you -- did anyone at the State
6 Department contribute to the origination of --
7 of EIP?

8 MR. KIRSCHNER: Objection, lack of
9 foundation.

10 A. I'm not aware of any State
11 Department involvement.

12 Q. So it appears that it was partly
13 funded by the government, and that it was -- the
14 idea was originated by government workers at the
15 time; correct?

16 MR. KIRSCHNER: Objection, lack of
17 foundation.

18 BY MR. SAUER:

19 Q. Is that what it says?

20 A. I --

21 MR. KIRSCHNER: Objection,
22 mischaracterizing testimony.

23 A. I -- I see what it says here.

24 Q. Yeah. Go down further in that
25 paragraph, and specifically that's what it says;

1 right? It says that it was originated by people
2 who were working for CISA at the time; correct?

3 MR. KIRSCHNER: Objection, asked
4 and answered, mischaracterizing the evidence.

5 BY MR. SAUER:

6 Q. Is that what it says?

7 A. It says that: Stanford funded the
8 students to complete internships, not that CISA
9 funded them. It says the Stanford Internet
10 Observatory funded to complete.

11 Q. Right, the internships were funded.

12 A. By Stanford.

13 Q. Right. And they were volunteer
14 internships at CISA. So CISA interns who were
15 funded by Stanford --

16 A. Right.

17 Q. -- originated the idea for the EIP?
18 I'm just asking if that's what it says.

19 A. Yes, that is what it says here,
20 yes.

21 Q. Okay. Lower down on in the same
22 paragraph: This is especially true; do you see
23 that sentence? Actually, immediately before
24 that, it says: No government agency in the
25 United States has the explicit mandate to

1 monitor and correct mis and disinformation;
2 correct?

3 A. Yes.

4 Q. And it goes on to say: This is
5 especially true for election disinformation that
6 originates from within the United States, which
7 would likely be excluded from law enforcement
8 action under the First Amendment and not
9 appropriate for study by intelligence agencies
10 restricted from operating inside the United
11 States; correct?

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

13 Q. Okay. And are you aware of any
14 discussions at GEC of, you know, setting up a
15 collaboration with nongovernmental third parties
16 to engage in activities that the GEC would be
17 prohibited from engaging in under the First
18 Amendment?

19 MR. KIRSCHNER: Objection, to the
20 extent this is asking for attorney-client
21 information, I would instruct the witness not to
22 answer, to the extent you can answer without --

23 BY MR. SAUER:

24 Q. Yeah, I'm not asking for anything
25 the lawyers told you in the context of

1 **representing you. I'm just asking for**
2 **conversations within the GEC about working with**
3 **outside third parties to conduct activities that**
4 **the GEC could not do because of First Amendment**
5 **restrictions.**

6 MR. KIRSCHNER: Again, objection,
7 I'm instructing the witness not to answer to
8 include any attorney-client communication within
9 the Department of State about what can and
10 cannot be done.

11 MR. SAUER: I'm not asking for
12 that.

13 Go ahead.

14 MR. KIRSCHNER: Well, no, I'm
15 instructing him not to answer about -- about
16 attorney-client communication, to the extent he
17 can answer that is outside of any legal
18 advice --

19 THE WITNESS: Right.

20 MR. KIRSCHNER: -- received in the
21 context of this question, he can answer.

22 A. Outside of legal advice, I'm not
23 aware of any conversations at the GEC that would
24 involve any infringement on First Amendment
25 rights.

1 Q. Flip ahead to page 6, Arabic 6.
2 Do you see there's a kind of list
3 of the goals of the Election Integrity
4 Partnership?

5 A. Yes.

6 Q. Are you aware of the GEC having any
7 input in the formulation of their goals?

8 MR. KIRSCHNER: Objection,
9 speculative, asked and answered.

10 BY MR. SAUER:

11 Q. Are you aware?

12 A. No, I'm not aware of any GEC input
13 into these goals.

14 Q. Bottom left corner of this page, of
15 this diagram, you see it says: Flag policy
16 violations for platforms; correct?

17 A. Yes.

18 Q. Okay. Are you aware of anyone at
19 the GEC working with EIP to flag policy
20 violations for platforms?

21 MR. KIRSCHNER: Objection,
22 speculative, asked and answered.

23 A. No, I'm not aware.

24 Q. Flip ahead to page 8, it talks
25 about how the EIP tracked its analysis topics

1 and engaged it with outside stakeholder
2 organizations using an internal ticketed work
3 flow management system; correct?

4 A. Where is this?

5 Q. I'm sorry, very bottom, full
6 paragraph?

7 A. Okay.

8 Q. Second sentence -- or sorry --
9 first sentence there.

10 A. Okay.

11 Q. Third sentence, there, goes on to
12 say: Tickets were submitted by trusted external
13 stakeholders, as detailed in section 1 -- sorry,
14 1.4 and internal EIP analyst; do you see that?

15 A. I do see that.

16 Q. Do you know who the trusted
17 external stakeholders were who were submitting
18 tickets to the EIP?

19 MR. KIRSCHNER: Objection,
20 speculative, asked and answered.

21 BY MR. SAUER:

22 Q. Do you know?

23 A. No, I do not.

24 Q. Now, there's a reference there to
25 section 1.4 on page 11, right? There it

1 identifies external stakeholders; correct?

2 A. Yes.

3 Q. And there it starts saying: The
4 EIP served as a connector for many stakeholders
5 and so forth; right?

6 A. Mm-hmm.

7 Q. The next sentence, which is on page
8 12, first full sentence on page 12, said:
9 External stakeholders included government, civil
10 society, social media companies and news media
11 companies; correct?

12 A. Yes.

13 Q. Okay. And so the external
14 stakeholders include some governmental entities
15 correct?

16 A. Yes.

17 Q. According to the report?
18 Is the GEC one of them?

19 MR. KIRSCHNER: Objection, lack of
20 foundation, speculative.

21 A. I -- I see the GEC listed here,
22 yes.

23 Q. Down there under four, you're
24 getting ahead of me, down there under four,
25 major stakeholder groups; right?

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1 A. Yes.

2 Q. And those external stakeholders are
3 the ones listed in the reports as government
4 partners, quote, could create tickets or send
5 notes to EIP analysts, and they used these
6 procedures to flag incidents or emerging
7 narrative to be assessed for EIP analysis?

8 MR. KIRSCHNER: Objection,
9 mischaracterizes evidence, lack of foundation.

10 BY MR. SAUER:

11 Q. Do you see where it says that in
12 the first sentence, in the first full paragraph
13 of this page, exactly as I read it?

14 A. I do see that.

15 Q. Was the GEC one of those government
16 partners who could create tickets or send notes
17 to EIP analysts and use those procedures to flag
18 incidents or emerging narratives?

19 MR. KIRSCHNER: Objection,
20 speculative.

21 BY MR. SAUER:

22 Q. Do you know?

23 A. I don't know, beyond what's written
24 here.

25 Q. Okay. And down there in the middle

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1 of the diagram, in the middle, where it
2 identifies four major stakeholder groups, the
3 first one is government; right?

4 A. Yes.

5 Q. And there's three partners listed,
6 the elections infrastructure, ISAC; do you know
7 what that is?

8 A. No, I don't.

9 Q. And CISA; correct?

10 A. Yes.

11 Q. And then GEC; correct?

12 A. Yes.

13 Q. So GEC is at least identified in
14 this report as a major stakeholder group;
15 correct?

16 A. It's listed as a member of a major
17 stakeholder group, yes.

18 Q. Right, right, right, it's one of
19 three members of a major stakeholder group. And
20 the report says that external stakeholders,
21 trusted stakeholders, include government;
22 correct, up there at the top?

23 A. Yes.

24 Q. And that those stakeholders,
25 including government partners, could submit

1 tickets to the EIC; right?

2 A. Yes.

3 MR. KIRSCHNER: Objection, lack of
4 foundation.

5 BY MR. SAUER:

6 Q. Did anyone authorize -- do you
7 remember anyone authorizing anyone at GEC to
8 submit tickets to the EIP?

9 MR. KIRSCHNER: Objection, lack of
10 foundation, mischaracterizes evidence.

11 A. No, I don't recall that.

12 Q. Did you authorize that?

13 A. I don't recall authorizing it.

14 Q. Who was that? Who was in charge
15 of -- like, who was in charge of GEC during the
16 period from, you know, the three months prior to
17 the 2020 election?

18 A. It would have been coordinator Lea
19 Gabrielle.

20 Q. Okay. Do you know if she ever
21 issued any orders about the GEC of any kind.

22 A. If she issued any orders about the
23 GEC of any kind?

24 Q. Yeah, do you know if she did? Do
25 you know if she gave any directive to anyone --

1 sorry -- do you know if she gave any directive
2 to anyone at GEC about EIP of any kind?

3 A. No, I don't.

4 Q. Can you turn to the next page.

5 Do you see how there's a section
6 there called EI-ISAC?

7 A. Yes.

8 Q. Do you know what EI-ISAC is?

9 A. No.

10 Q. There, it says: The election
11 infrastructure information sharing and analysis
12 center -- analysis center, which is run by The
13 Center For Internet Security; do you know what
14 that is?

15 A. No, I do not.

16 Q. Are you aware of any relationship
17 between The Center For Internet Security and
18 CISA?

19 A. No.

20 Q. Can you turn to page 17, talks
21 about using platforms, in the middle of the
22 page, under there it says: The EIP established
23 relationships with social media platforms to
24 facilitate flagging of incidents for evaluation
25 when content or behavior appeared to violate

1 platform policies; correct?

2 A. Yes.

3 Q. So the EIP wanted to facilitate
4 flagging of incidents for evaluation when there
5 appeared to be a content modulation policy; is
6 that what it's saying?

7 MR. KIRSCHNER: Objection, lack of
8 foundation.

9 A. No. It's saying flagging of
10 incidents for evaluation when content or
11 behavior appeared to violate platform policies;
12 it doesn't say anything about modulation.

13 Q. Okay. Are you aware of anyone at
14 the GEC flagging incidents for evaluation of any
15 kind for -- for social media platforms?

16 MR. KIRSCHNER: Objection to form.

17 BY MR. SAUER:

18 Q. Let me rephrase that.

19 Are you aware of anyone at the GEC,
20 quote, flagging of incidents for evaluation for
21 social media platforms in any way?

22 A. Not that I recall.

23 Q. Can you flip ahead to page 27?

24 A. Mm-hmm.

25 Q. If you see under key findings, it

1 **says: We processed 639 in-scope tickets?**

2 A. Yes.

3 **Q. And then it says, 72 percent of**
4 **these tickets were related to delegitimizing the**
5 **election results; correct?**

6 A. Yes.

7 **Q. Then down at the bottom, it says:**
8 **35 percent of the URLs we shared with Facebook,**
9 **Instagram, Twitter, TikTok and YouTube were**
10 **either labeled removed or soft blocked; correct?**

11 A. I see that, yes.

12 **Q. So their data indicates that they**
13 **processed hundreds of tickets, 72 percent of**
14 **them related to delegitimizing of election**
15 **results; correct?**

16 A. Yes.

17 **Q. And then some sort of action was**
18 **taken by the social media platforms, either**
19 **labeling, removing, or soft blocking 35 percent**
20 **of them?**

21 MR. KIRSCHNER: Objection, lack of
22 foundation, speculative.

23 A. Yes, I see that sentence.

24 **Q. Did GEC have any involvement in**
25 **seeking the soft blocking, removal or -- or --**

1 or other action against any content on the
2 internet?

3 MR. KIRSCHNER: Objection,
4 speculative, asked and answered.

5 A. I'm not -- I don't know of any GEC
6 actions of that type.

7 Q. Can you go to page 30? And I've
8 got a kind of internal communication, electronic
9 communication chain here, between the government
10 partner, a platform partner, and EIP member; do
11 you see that?

12 A. I do.

13 Q. And the government -- the platform
14 partner and government partner are redacted over
15 the person who was actually participating in the
16 conversation; do you know who those were?

17 MR. KIRSCHNER: Objection,
18 speculative.

19 A. No, I don't.

20 Q. Could you go to page 33? Do you
21 see in the second paragraph there, at the
22 bottom, there's a reference to the
23 gatewaypundit.com?

24 A. Where is this?

25 Q. Second paragraph, last sentence.

1 A. Yes, I see that.

2 Q. And it says: The top
3 misinformation-spreading websites were the far
4 right forum theDonald.win, blah, blah, blah,
5 blah, blah, and the gatewaypundit.com, a far
6 right news website?

7 A. I see that.

8 Q. Have you ever heard of the
9 gatewaypundit.com?

10 A. I may have. I don't -- I don't
11 recall any details.

12 Q. Have you ever heard it discussed in
13 any meetings with any government officials?

14 A. No, I don't recall.

15 Q. And would it surprise you to learn
16 that it's cited 49 times in this report?

17 MR. KIRSCHNER: Objection, lack of
18 foundation, speculative.

19 A. I -- I have no -- it doesn't
20 surprise me or not surprise me.

21 Q. Do you know -- do you remember any
22 discussion of any kind relating to the
23 gatewaypundit and social media content relating
24 to the elections?

25 A. No, I don't.

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1 Q. You don't?

2 Could you go to page 35. Do you
3 see there, right above the bold heading, tickets
4 by fact-checking URLs, there's a paragraph?

5 A. Yes.

6 Q. And the report states that last, we
7 coded tickets based on whether they additionally
8 related to COVID-19 narratives, or had an
9 element of foreign interference; correct?

10 A. Yes.

11 Q. And it says -- remember, there were
12 639 tickets referred to earlier; do you recall
13 that?

14 A. Yes.

15 Q. And it says: Interestingly, just
16 one percent of the tickets related to COVID-19,
17 and less than one percent related to foreign
18 interference; correct?

19 A. Yes.

20 Q. So if less than one percent related
21 to foreign interference, it seems that over 99
22 percent of what the EIP was doing with its
23 tickets related to stuff that's kind of outside
24 what you've described as the mission of GEC; is
25 that fair to say?

1 MR. KIRSCHNER: Objection, lack of
2 foundation, speculative, asked and answered.

3 BY MR. SAUER:

4 Q. Is that -- is that fair to say?

5 A. No, because a foreign-originated
6 narrative can relate to anything. This is just
7 talking about the narratives are related to
8 foreign interference. A COVID-related narrative
9 could originate with a foreign malign influence
10 factor. This doesn't tell you anything about
11 that, so no, I would -- I would disagree.

12 Q. So you think that GEC could flag
13 things for the EIP that wouldn't be related to a
14 foreign interference?

15 MR. KIRSCHNER: Objection,
16 mischaracterizes testimony.

17 A. No. What I said is that a foreign
18 disinformation narrative does not necessarily
19 have to be related to foreign interference. The
20 Russian propaganda and disinformation is not
21 about Russian interference. It could be about
22 COVID, it can be about anything.

23 The foreign actor behind it, and
24 the subject of foreign interference, those two
25 things are not equivalent.

1 You cannot conclude that 99 percent
2 of the narratives had no relation to a foreign
3 actor just because they weren't related to
4 foreign interference. They could be about
5 anything and still originate with the foreign
6 actor.

7 **Q. I got you. So -- so that's a**
8 **distinction between the originator of the**
9 **narrative and the content of the narrative, fair**
10 **to say, that you're drawing?**

11 A. Yes.

12 **Q. Okay. So foreign interference**
13 **tickets would relate to foreign -- I take it**
14 **foreign interference in elections or -- go**
15 **ahead.**

16 A. The subject of the narrative in the
17 foreign or non-foreign origination, the nexus to
18 a foreign actor, are not necessarily related.

19 You can't draw a conclusion about a
20 nexus to a foreign actor and, therefore, the GEC
21 mandate, based on the focus of the narrative.

22 **Q. So, in other words, you could have**
23 **a COVID narrative that's false, has nothing to**
24 **do with foreign interference, but it might be of**
25 **concern to the GEC because it originated with**

1 China or Russia, for example?

2 A. Correct.

3 Q. And there could be other
4 narratives, as well.

5 Why don't you flip ahead to --
6 let's flip ahead to page 38.

7 A. Okay.

8 Q. Do you see the graph there at the
9 top of the part of the page, a bar graph?

10 A. Yes.

11 Q. And it says: Percent of tickets by
12 organization flagged; right?

13 A. Yes.

14 Q. And GEC's kind of there in the
15 middle, right, indicating that something between
16 zero and ten percent of tickets were flagged by
17 the GEC?

18 A. Well, it's in the middle of the
19 graph, but it seems to be quite far down, if you
20 add up the percentages.

21 Q. Right. What's below Facebook and
22 Twitter, for example, and well below the EE at
23 ISAC; correct?

24 A. Yes.

25 Q. But it looks like that bar is

1 **somewhere between zero and ten; right?**

2 A. It looks like it's between zero and
3 five.

4 Q. Yeah, I agree with that, too.

5 Do you have any idea what was being
6 flagged by GEC for the EIP?

7 A. No, I don't.

8 Q. Okay. Turn to the next page, just
9 a number there, do you see in the -- towards the
10 bottom of the page, in the second to last
11 paragraph, there's reference to a web scraping
12 tool and how they ran it on all 4,832 URLs in
13 the tickets; right?

14 A. Yes, I see that.

15 Q. So the 639 tickets involved a lot
16 more than 639 URLs; correct?

17 MR. KIRSCHNER: Objection,
18 speculative.

19 A. The relationship between the
20 tickets and URLs is not clear to me here.

21 Q. Page 42, can you turn ahead to
22 that, bottom of the page, concerns by reporting
23 collaborators, correct, very last sentence?
24 Other groups that it reported tickets include
25 the State Department's Global Engagement Center;

1 correct?

2 A. Yes, I see that.

3 Q. And again, you have no idea what
4 those were; is that fair to say?

5 A. I don't know what they were.

6 Q. Do you know how this reporting was
7 done, do you know if there was, like, an online
8 kind of platform to do it, that you logged into
9 or --

10 A. I -- I don't know anything about
11 the -- the mechanics.

12 Q. Okay. Later, in page 51, you need
13 to read it, there's a reference to general
14 concerns relating to mail-in ballots, it says:
15 That constituted the most prominent type of
16 misinformation assessed in the months leading up
17 to election day.

18 Have you ever heard discussions of
19 that in the GEC in any connection?

20 A. No.

21 Q. So you -- you -- you're not aware
22 of any discussions or conversations within the
23 GEC about, you know, disinformation relating to
24 the security of voting by mail?

25 A. No, I'm not.

1 **Q. Including such disinformation that**
2 **might have originated as a foreign narrative or**
3 **anything like that?**

4 A. No, I'm not aware of any
5 discussions within the GEC about disinformation
6 narratives related to mail-in ballots.

7 **Q. Are you aware of any narratives**
8 **relating to mail-in ballots that are**
9 **disinformation?**

10 MR. KIRSCHNER: Objection, vague.

11 BY MR. SAUER:

12 **Q. You can answer.**

13 A. I believe there were Russian
14 narratives on the overall integrity of the
15 elections. I don't recall all the specifics.

16 **Q. Do you know what the -- generally,**
17 **what those narratives said?**

18 A. I -- I don't recall the specifics.

19 **Q. Were those narratives discussed**
20 **within the Russia team that you mentioned**
21 **Mr. Beebe is a member of?**

22 A. I -- I don't know what the internal
23 discussions of the Russia team were.

24 **Q. Do you remember anything about what**
25 **they said about those narratives?**

1 MR. KIRSCHNER: Objection, asked
2 and answered.

3 A. No, I do not.

4 Q. If you flip way ahead, to page 183,
5 the very middle paragraph of that page, it
6 discusses there incident-related tweet data;
7 correct?

8 MR. KIRCHNER: Objection.

9 A. Which paragraph is this?

10 Q. Are you on page 183?

11 A. Yes.

12 Q. It's the last paragraph before the
13 heading: Facebook and Instagram data
14 collection?

15 A. Yes, I see that.

16 Q. And there it talks about -- earlier
17 I talked about how there were, you know,
18 thousands of URLs, talks about number of tweets
19 affected, that last number is 21,897,364 tweets;
20 correct?

21 A. Yes, I see the number.

22 Q. And is that the -- is that a scope
23 of how many tweets were affected by the -- or
24 considered by the EIP's tickets?

25 MR. KIRSCHNER: Objection, lack of

1 foundation, speculative.

2 A. It says that their incident-related
3 tweet data included -- the relationships are not
4 entirely clear to me -- included 5,888,771
5 tweets and retweets from ticket status -- from
6 ticket status IDs directly, 1,094,115 tweets and
7 retweets, collected first from ticket URLs, and
8 14,914,478 from key word searches, for a total
9 of 21,897,364 tweets. It's not entirely clear
10 to me what that means.

11 Q. Can you flip ahead to page 211.
12 There's a chapter six called policy.

13 A. Mm-hmm.

14 Q. And there in the first paragraph,
15 in the third line, it says: During the 2020
16 election all the major platforms made
17 significant changes to election integrity
18 policies; correct?

19 A. Yes, I see the sentence.

20 Q. And without, you know, going to all
21 the tabs, also in the report they talk about how
22 the EIP actually kind of pushed for those
23 changes; is that right?

24 MR. KIRSCHNER: Objection, lack of
25 foundation.

1 A. I haven't read the full report.

2 Q. Are you aware of public statements
3 to that effect, that the EIP advocated for more
4 restrictive election-integrity policies at the
5 major social media platforms?

6 A. No, I didn't track the EIP's public
7 statements.

8 Q. Do you have any knowledge of the
9 GEC being involved in advocating for more
10 restrictive content modulation policies with
11 respect to elections at social media platforms?

12 A. No.

13 Q. Do you have any knowledge of anyone
14 at the GEC being involved in any kind of, you
15 know, advocacy or argument relating to content
16 modulation policies of any kind?

17 MR. KIRSCHNER: Objection, vague,
18 ambiguous.

19 A. Do you mean advocating to change
20 their policies?

21 Q. Correct.

22 A. No.

23 Q. How about any discussion of content
24 modulation policies at the GEC in any
25 connection?

1 MR. KIRSCHNER: Objection, vague,
2 ambiguous.

3 A. Can I ask you to clarify? I
4 haven't heard the term: Content modulation,
5 before. I've heard content moderation.

6 Q. Why don't we use content
7 moderation, then.

8 A. Okay.

9 Q. You understand -- to you, what does
10 content moderation policy mean?

11 A. I'm not going to define -- I don't
12 know how the social media companies define that,
13 specifically.

14 Q. How do you understand it as a -- go
15 ahead.

16 A. Their terms of service.

17 Q. And are they, in particular, their
18 terms of service as it permits them to either
19 de-emphasize, block, remove, or de-platform
20 content that they deem to be inappropriate, is
21 that content moderation?

22 A. I -- I -- I don't know the
23 specifics for each company, but it's, I believe,
24 how they -- how they determine what is
25 appropriate and inappropriate content on their

1 platform.

2 Q. And then -- and then take action
3 against inappropriate content; correct?

4 A. Potentially.

5 Q. Okay. And can I, for the purpose
6 of my next line of questions with you, can we
7 use it that way, as referring to the policies of
8 the social media platforms by which they
9 determine what's appropriate and inappropriate
10 content, and potentially take some kind of
11 action against inappropriate content?

12 A. With the caveat that I don't know
13 specifically how the companies, themselves,
14 define it.

15 Q. Sure. And my only question is:
16 Are you aware of that general issue, which we
17 were calling content moderation policies, being
18 discussed at the GEC in any connection?

19 A. No. The GEC didn't engage on the
20 specifics of their content moderation policies.

21 Q. Were there ever any discussions
22 within the GEC about content moderation policies
23 and how they might apply to, say, Russian, you
24 know, originated narratives?

25 MR. KIRSCHNER: Objection. To the

1 extent this is asking for deliberative
2 information within the GEC, I instruct the
3 witness not to answer on privileged grounds. To
4 the extent you can answer without getting into
5 internal deliberations, you may answer.

6 BY MR. SAUER:

7 **Q. For starters, can you identify**
8 **whether you're aware of any such conversations**
9 **without identifying the content of such**
10 **conversations.**

11 A. I'm not aware of conversations
12 specifically focused on content moderation
13 policies at specific social media companies.

14 **Q. Other than specifically focused,**
15 **are you aware of conversations or discussions**
16 **that address that issue in any way?**

17 A. I think the only context would be
18 the platforms periodically released public
19 statements on campaigns they identified and
20 things that they took down. And we looked at
21 those public statements like -- like -- like
22 everybody else.

23 But that wasn't focussed on the
24 moderation policies. It was focused on how they
25 were looking at foreign propaganda and

1 disinformation actors.

2 **Q. Do you remember a specific public**
3 **statement of that kind, like, did Facebook ever**
4 **say, hey, we've decided to take down, you know,**
5 **allegations that the US government manufactured**
6 **AIDS in a lab in the 1970s?**

7 A. No, because each platform releases
8 them regularly. I don't remember a specific
9 one, no.

10 **Q. So it happens frequently?**

11 A. (Nodding.)

12 **Q. And that's something -- sorry, it**
13 **happens frequently?**

14 A. Yes, it -- I don't remember the
15 frequency at each social media company, but
16 they -- they release them periodically.

17 **Q. Why do you track that information?**

18 MR. KIRSCHNER: Objection,
19 assuming -- mischaracterizing testimony and
20 vague. You said: "That information."

21 BY MR. SAUER:

22 **Q. Why do you track the information**
23 **that is released by the social media companies?**

24 A. It's publicly-released information
25 that's also covered in the media, and we look at

1 it to stay informed about the tools, techniques,
2 and campaigns of foreign propaganda and
3 disinformation actors.

4 Q. Do you know whether the EIP is
5 still functioning?

6 A. I don't.

7 Q. Do you know if they had activities
8 that relate to the 2022 election that just
9 finished on Tuesday?

10 A. I don't.

11 Q. And do you know whether they plan
12 to have, you know, activity with respect to
13 future elections, like 2024?

14 A. No.

15 Q. Do you know if GEC is still
16 involved in the EIP in any capacity?

17 MR. KIRSCHNER: Objection, assumes
18 evidence not on record, lack of foundation,
19 vague.

20 BY MR. SAUER:

21 Q. Do you know?

22 A. No.

23 Q. You do not know?

24 A. I do not.

25 Q. For example, Mr. Beebe, is he still

1 at GEC?

2 A. I believe he is.

3 Q. And then the other lady you
4 mentioned, I can't remember her name.

5 A. Adele Ruppe is no longer at the
6 GEC.

7 Q. She's no longer at the GEC? And
8 you don't know if either they or anyone else is
9 still interacting with EIP in any way?

10 A. I don't, no.

11 MR. KIRSCHNER: If you're done with
12 that exhibit, then can we take a five-minute
13 break?

14 MR. SAUER: Yeah, sure. Yeah.
15 Yeah. I'll go through the remaining exhibits
16 during the break and see what we can do to move
17 forward.

18 MR. KIRSCHNER: All right. Do you
19 have a sense -- sorry, let's go off the record
20 first.

21 THE VIDEOGRAPHER: All right. The
22 time is 3:21 p.m. We are off the record.

23 (Recess.)

24 THE VIDEOGRAPHER: The time is 3:31
25 p.m. We're back on the record. Please proceed.

1 MR. SAUER: You're being handed
2 Exhibit 13, it's just a one-pager.

3 (Exhibit No. 13 was marked for
4 identification.)

5 BY MR. SAUER:

6 Q. And this is a website called
7 Facebook Content Requests, that says that this
8 portal is for on-boarded partner requests
9 pertaining to content issues at Facebook and
10 Instagram; have you ever seen a website like
11 this?

12 A. I don't believe so.

13 Q. Are you familiar with anyone at GEC
14 having authority to use a website that provides
15 a kind of privileged or sort of line of
16 communication with social media platform?

17 MR. KIRSCHNER: Objection, lack of
18 foundation, speculative.

19 BY MR. SAUER:

20 Q. Are you aware of any?

21 A. I -- I'm not aware of any specific
22 individual at GEC, no.

23 Q. Have you ever heard of the phrase:
24 Partner support portal?

25 A. No, not before you just used it.

1 Q. Okay. Are you aware of certain
2 social media platforms having lines of
3 electronic communication or websites that their
4 partners can log into to report issues relating
5 to content on their platforms?

6 A. Yes, I'm aware that there are
7 portals where users can -- or anyone can report
8 issues, I believe.

9 Q. Are you aware of anyone at the GEC
10 using any such portal?

11 A. I'm not aware of any -- I'm not
12 aware of any specific instance of someone using
13 a portal like that.

14 Q. Are you aware of any discussions
15 with the FBI about a Russian hack and leak
16 operation that was anticipated to occur in late
17 2020?

18 MR. KIRSCHNER: Objection. To the
19 extent this is calling for law enforcement
20 activity, and Mr. Kimmage is aware of any such
21 law enforcement activity, I would instruct the
22 witness not to answer.

23 To the extent you can answer
24 without engaging in discussion of law
25 enforcement or other deliberative information,

1 you may answer.

2 A. I'm not aware of any specific
3 discussion. Could you be more specific?

4 Q. Sure. Did you hear, at any time,
5 that the FBI had raised any kind of concerns
6 relating to a Russian hack and leak operation or
7 hack and release operation is, I think, how you
8 described it earlier, in 2020?

9 MR. KIRSCHNER: Again, same
10 objection. To the extent this is calling for
11 internal deliberations or a law enforcement
12 information that is privileged, I instruct the
13 witness not to answer. To the extent that you
14 can answer without revealing potential
15 privileged information, you may proceed.

16 A. I don't recall, and I can't speak
17 for FBI's concerns and activities in the period.

18 Q. Do you recall -- do you recall
19 there being any concern, in any quarter, about a
20 hack and release operation that the Russians
21 might employ in the 2020 election cycle?

22 MR. KIRSCHNER: Again, I instruct
23 the witness -- object. I instruct the witness,
24 to the extent that this is calling for law
25 enforcement information or even classified

1 information, I instruct the witness not to
2 answer.

3 To the extent the witness can
4 answer without divulging such information, the
5 witness may proceed.

6 A. Given that reporting would have
7 potentially occurred through classified
8 channels, I don't feel that I can answer that
9 in -- in open discussion.

10 Q. Let me -- let me tease that out a
11 little bit.

12 So are you withholding any
13 information, in response to my question, because
14 of the instruction -- the conditional
15 instruction you received from your counsel.

16 A. No. I'm not aware of any specific,
17 but because communication on topics like this
18 would have occurred generally through classified
19 channels I don't feel that I can answer that
20 here.

21 Q. So your answer to my question is,
22 no, you're not withholding any information on
23 the grounds of privilege in responding to my
24 question?

25 A. No.

1 Q. That is not your answer? Sorry,
2 let's --

3 A. Could you clarify that?

4 Q. I just want to know, we've had -- I
5 asked you a question.

6 A. Right.

7 Q. And your lawyer said: To the
8 extent that your answer raises classified
9 information or law enforcement information I
10 instruct you not to answer.

11 And you said -- I'm not clear
12 whether you know of something that relates to a
13 hack and leak operation, but you're not going to
14 tell me because you received a privilege
15 instruction?

16 A. Right.

17 Q. Or you don't know anything.
18 Those are two totally different
19 answers?

20 A. Right.

21 Q. And I'm not asking for the content
22 of any such communication.

23 A. Right.

24 Q. Right? Because we get to that in a
25 minute. I just want to know if there is such

1 communication.

2 A. I'm not aware of anything specific.

3 Q. Okay. So you're not withholding
4 any information from me on grounds of privilege
5 in response to that question?

6 A. I'm not withholding anything
7 specific.

8 Q. So you're not aware of any concern
9 raised in any quarter about a Russian hack and
10 release operation with respect to the 2020
11 election?

12 A. Could you be more specific? Is
13 there a specific operation?

14 Q. Well, if you've read our complaint
15 you may know there's allegations relating -- or
16 read some of our pleadings, at least -- you may
17 know there's allegations that there were
18 communications to certain social media platforms
19 from the federal government that said: We
20 anticipate a Russian hack and release operation
21 in October of 2020.

22 So remember, there was the 2016
23 hack and release operation, we talked about
24 before; right?

25 A. Right.

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1 Q. And are you aware of any -- let me
2 put it this way: Are you aware of any
3 communication between any federal official, in
4 any social media platform, that related to any
5 concern about a Russian hack and release
6 operation that might or might be planned for the
7 2020 election cycle?

8 A. Are you asking about GEC?

9 Q. No. I'm asking about any federal
10 official, when I said any federal official.

11 A. I can't speak for any federal
12 official.

13 Q. I'm asking you: Do you know of
14 any, are you aware?

15 A. I'm not aware of any.

16 Q. How about GEC, are you aware of any
17 GEC communication with any social media platform
18 about any concern or anticipated Russian hack
19 and release operation with respect to the 2020
20 election?

21 A. I don't recall any GEC
22 communications about Russian hack and release
23 operations.

24 Q. How about State Department, any
25 communication from State Department?

1 A. I can't speak for the entire
2 department.

3 **Q. Okay.**

4 A. I'm not aware.

5 **Q. Are you aware?**

6 A. Nom I'm not aware.

7 **Q. Are you aware -- how about CISA or**
8 **DHS, are you aware of any communication or**
9 **anything like that from that quarter?**

10 A. I can't speak to their
11 communications.

12 **Q. Are you aware?**

13 A. I'm not aware of any.

14 **Q. And how about the FBI, are you**
15 **aware of any communications from FBI or FTIF to**
16 **any social media platform that relates to that?**

17 A. I'm not aware, no.

18 MR. SAUER: Can you give me S?

19 You're being handed Exhibit 14.

20 (Exhibit No. 14 was marked for
21 identification.)

22 BY MR. SAUER:

23 **Q. Do you recognize this document?**

24 A. Yes.

25 **Q. And what is it?**

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1 A. It's a transcript of a talk I gave
2 in 2021.

3 Q. And was this at the Washington
4 Institute For Near East Policy?

5 A. Yes.

6 Q. The bottom of the first page, you
7 talk about: Technology is woven into virtually
8 aspects of this problem and you're trying to --
9 trying to stay ahead of the curve; right?

10 A. Yes.

11 Q. And spilling onto the next page,
12 you talk about counter-disinformation
13 technologies and their implementation?

14 A. Yes.

15 Q. At what -- what are those? What
16 are the counter-disinformation technologies that
17 you're talking about there and their
18 implementation?

19 A. So as I detailed earlier, they
20 could be software that would help to identify
21 coordinated inauthentic activity by a foreign
22 propaganda and disinformation.

23 Q. Any -- anything else, other than
24 tracking propaganda and disinformation?

25 A. There's a wide array of

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1 technologies. I -- I can't list them all. I
2 can -- there -- there are many different
3 technologies that can be applied to the problem.

4 **Q. Can you give me a better picture of**
5 **what they're like? I know we had some type of**
6 **discussion of this earlier, and I didn't come**
7 **away with any --**

8 A. Sure.

9 **Q. -- real grasp of what these**
10 **technologies are?**

11 A. Right.

12 **Q. And I'm not a techie person.**

13 A. Sure.

14 **Q. But can you clarify that, at all?**

15 A. So with the caveat that I'm also
16 not a technology expert, it would be, you know,
17 a tool that could analyze data to cast light on
18 how Russia or China is trying to manipulate
19 online discourse, it could be a tool that raises
20 awareness, for example, a game that people play,
21 to understand how disinformation is introduced
22 by a foreign actor, something that raises their
23 awareness, it could be a tool like that, for
24 example.

25 It could be an interactive website

1 that shows Chinese investments in the tech
2 sector, for example, to show how Chinese
3 influence is expanding in the tech sector. And
4 that is a -- computed as a technology-driven
5 tool that helps to counter propaganda and
6 disinformation, because, of course, China's
7 propaganda is that they're not doing this, in
8 fact, they are doing this.

9 And when you're casting light on it
10 with, for example, a data rich website that
11 would show that, you're countering their
12 propaganda.

13 Q. Lower down on that page, second
14 paragraph from the bottom --

15 A. Mm-hmm.

16 Q. -- you talk -- you talk about their
17 work, your work in the context of the COVID
18 crisis; correct?

19 A. Yes.

20 Q. And you -- you talk about how they
21 would -- COVID involved a new wave of propaganda
22 and disinformation; right?

23 A. Where does it say that?

24 Q. I'm paraphrasing, it rapidly became
25 clear that this would be an issue of global

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1 consequence, not simply in the scope of the
2 crisis but also in our area of propaganda and
3 disinformation; correct?

4 A. Yes.

5 Q. Okay. And you talked about Russia
6 pushing conspiracy theories. Do you know what
7 those were? What were you talking about there?

8 A. Yeah, as I detailed earlier, they
9 were propaganda narratives and disinformation
10 narratives about the origins of the virus, about
11 the efficacy of US and Western-developed
12 vaccines, about the efficacy of Russian
13 vaccines. These were propaganda narratives that
14 Russia sought to use in the context of the
15 pandemic.

16 Q. And you go on to say: We saw the
17 Peoples Republic of China suggesting various
18 false and nefarious narratives about the origin
19 of the virus. Do you remember what -- is that
20 right?

21 A. Yes.

22 Q. Do you remember what those
23 narratives were or are?

24 A. Some of them alleged a US role. I
25 don't recall the specifics, but along the lines

1 of the notorious KGB operation alleging a US
2 government role in the creation of the AIDS
3 virus, there were Chinese propaganda narratives
4 that suggested some sort of US role, and there
5 were Russian narratives that suggested the same
6 things.

7 **Q. What was that -- what role did**
8 **China say or --**

9 A. Right.

10 **Q. -- Chinese actors say that the US**
11 **had in the origin of the virus?**

12 MR. KIRSCHNER: Objection, calls
13 for a narrative response.

14 A. With the caveat that I don't recall
15 all the specifics, it would be that US medical
16 research led to the creation of a virus.

17 There are many different
18 narratives, it would be alleging some nefarious
19 US government role.

20 **Q. That the government -- so you said**
21 **US medical research funded by the government, is**
22 **that a narrative that the Chinese propagated?**

23 MR. KIRSCHNER: Objection,
24 mischaracterizes testimony.

25 A. It -- it's a narrative that I know

1 Russian propagandists have used. I don't recall
2 whether Chinese propagandists used that specific
3 narrative discussion. I know Russian
4 propagandists did.

5 **Q. What Chinese-specific narratives do**
6 **you remember about the origins of the virus?**
7 **You've got a robust reference to them here, and**
8 **I just wonder if I can get my head around what**
9 **you're talking about.**

10 A. The primary Chinese narratives, as
11 I recall, were really about how well China
12 responded to the pandemic compared to Western
13 countries. But I also recall that they disputed
14 and suggested alternative theories for the
15 emergence of the virus. And some of them
16 alleged a nefarious US government role.

17 **Q. Do you remember what that role was**
18 **that they alleged?**

19 A. No, I don't remember the specifics.

20 **Q. What did they say about -- what did**
21 **these narratives say about the first thing you**
22 **said, which had to do with how the Chinese**
23 **response was more successful?**

24 A. It would be touting how well -- how
25 quickly China responded, how effectively they

1 responded, and contrasting that with, for
2 example, Western countries, like Italy, that
3 struggled, initially, in dealing with the virus.

4 **Q. Was that -- was that disinformation**
5 **is, in fact, false that China did a better job**
6 **of responding to the virus?**

7 A. This would be more propaganda,
8 where they are selectively highlighting things
9 that are not necessarily false, but in the
10 context or misleading. So this is the
11 distinction between propaganda and
12 disinformation.

13 **Q. Can you flip to the next page.**

14 A. Mm-hmm.

15 **Q. At the top there, very top of the**
16 **page, at the bottom of that first paragraph, you**
17 **say: Finally, we provided rapid response grants**
18 **to local organizations on the front lines,**
19 **fighting the adversarial narratives of the COVID**
20 **info-demic, as some have called it.**

21 **What's -- what's involved there?**

22 A. I believe we had a program with
23 several embassies abroad, where we provided
24 rapid response grants to foreign organizations
25 fighting, generally, Russian and propaganda --

1 Chinese propaganda and disinformation in their
2 local environments.

3 Q. So those grants went to foreign --
4 foreign entities abroad?

5 A. Yes.

6 Q. And what -- what sorts of entities
7 would get them, would they be, like, local news
8 stations or who was fighting the COVID
9 info-demic abroad?

10 A. Generally, they would be civil
11 society organizations or potentially research
12 organizations.

13 Q. What's a civil society
14 organization?

15 A. A non-governmental organization
16 that is focused on a particular issue.

17 Q. Halfway down this page, at the
18 bottom and that middle paragraph, you say: I
19 would note in the counterterrorism context an
20 increasing focus on racially and ethnically
21 motivated violent extremism REMVE, what are you
22 talking about there, what are you referring to?

23 A. I'm referring to extremist
24 organizations that are promoting white supremacy
25 or similar racial and racially and ethnically

1 motivated narratives to justify violent
2 extremism.

3 Q. And are those -- is that something
4 that the GEC kind of tracks or monitors or pays
5 attention to?

6 MR. KIRCHNER: Objection,
7 mischaracterizes the testimony.

8 BY MR. SAUER:

9 Q. That's a question, is it
10 something --

11 A. The counterterrorism team at the
12 Global Engagement Center looks at violent
13 extremist organizations abroad and how they seek
14 to recruit people.

15 And as there has been an upswing in
16 the activity of groups focused on racially and
17 ethnically motivated violent extremism the
18 Global Engagement Center's counterterrorism team
19 has begun to look at those groups.

20 Q. Are you saying those -- those --
21 are those strictly groups abroad or does that
22 include domestic violent extremist groups?

23 A. Those are groups abroad.

24 Q. Okay. Do you -- does Global
25 Engagement Center have any role with respect to

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1 tracking or paying attention to domestic
2 racially or ethnically motivated violent
3 extremist groups?

4 A. No, it does not.

5 Q. What agency does that?

6 MR. KIRSCHNER: Objection.

7 BY MR. SAUER:

8 Q. If you know.

9 MR. KIRSCHNER: Lack of foundation,
10 speculative.

11 A. The -- the federal law enforcement
12 and federal and local law enforcement agencies.

13 Q. Turning to the next page, in that
14 second to last paragraph in the second line,
15 there's another reference to the -- the
16 disinfo-cloud, and you describe it as sharing
17 findings and information on disinformation
18 related challenges; correct?

19 A. Yes.

20 Q. And it describes a platform, and I
21 guess you're saying this in early 2021; right?

22 A. Mm-hmm.

23 Q. It describes a platform as having
24 1200 members, and has assessed 70 tools; right?

25 Do you know who those members were?

1 **It's a lot of members, is this just anyone who**
2 **wants to access that web page, who seeks and**
3 **receives authority to do so?**

4 A. So as I explained earlier, the
5 members of the disinfo-cloud would include some
6 representatives of government agencies, some
7 developers in the tech sector, and I believe
8 some researchers, as well.

9 **Q. And you go on, later in that**
10 **paragraph, to say: We have established a**
11 **liaison in Silicon Valley with the purpose of**
12 **sharing lessons learned and developing two-way**
13 **communications about foreign disinformation and**
14 **propaganda with our partners in the technology**
15 **industry; correct?**

16 A. Yes.

17 **Q. Is that a reference to the -- the**
18 **Silicon Valley location we talked about earlier?**

19 A. Yes, it is.

20 **Q. So that's a reference, essentially,**
21 **to Mr. Stewart --**

22 A. Yes, it is.

23 **Q. -- right?**

24 **Is there anything else that falls**
25 **in that bucket of a two-way liaison with Silicon**

1 Valley?

2 A. Could you clarify?

3 Q. Well, your -- your statement there,
4 about -- about establishing a liaison in Silicon
5 Valley and developing two-way communications
6 with technology companies, is that referring to
7 anything other than Mr. Stewart being located
8 out there, as we talked about earlier?

9 A. The two-way communications would
10 involve more than just Mr. Stewart, but the
11 liaison position was, of course, developed for
12 that purpose.

13 Q. And that -- so that liaison you're
14 referring to is, in fact, Mr. Stewart and these
15 remarks?

16 A. Yes.

17 Q. And I can't remember, I think you
18 said he's gone now, he's not at GEC anymore or
19 do you not remember?

20 A. Yes, I believe he's left the GEC.

21 Q. Did someone replaced him out in
22 Silicon Valley, is someone liaising there now?

23 A. There -- I don't think -- there is
24 no one from the GEC who is based in Silicon
25 Valley now.

1 Q. Was Mr. Stewart the last one or did
2 someone else -- did anyone else ever hold that
3 role of the Silicon Valley liaison based out in
4 California?

5 A. I don't think anyone held the role
6 based in California.

7 Q. Other than Mr. Stewart, you mean?
8 Mr. Stewart was based in
9 California, wasn't he? He said that in e-mails.

10 A. Yes. I believe he was the only GEC
11 employee to be based in California.

12 Q. When you're talking about these
13 liaison with tech companies, is part of the
14 purpose there to, you know, partner with tech
15 companies to stop the spread of disinformation
16 online?

17 MR. KIRSCHNER: Objection.

18 A. No. No. The purpose is, as stated
19 here, to share lessons and develop two-way
20 communications. The actions that they take are
21 for the tech companies. The GEC is sharing
22 lessons learned, information about the
23 techniques, the campaigns, the narrative of
24 foreign propaganda and disinformation actors.

25 Q. Is it a purpose of GEC, more

1 generally, to, you know, partner with private
2 tech firms to stop the spread of disinformation
3 on social media?

4 A. It's the purpose of the GEC to
5 engage with the tech industry and other partners
6 to counter propaganda and disinformation. It's
7 not dictating a specific action that they would
8 take.

9 Q. But is it a purpose that you said
10 to counter?

11 A. Yes.

12 Q. Yet earlier described counter can
13 involve a number of things, one thing, counter
14 can be a reputation, for example; right?

15 A. Yes.

16 Q. And your disinformation bulletins
17 refer to difficulties and talk about Lithuania
18 and so forth.

19 Another way of countering
20 disinformation might be, as you say, in some of
21 those bulletins, to attack credibility of the
22 person spreading it, right, that would another
23 way to counter?

24 And the third way to counter would
25 be to stop it from spreading in the first place,

1 **right? Those are three different things?**

2 A. That's correct. Those are three
3 different things. You can also raise awareness.
4 You can conduct what's called an inoculation
5 campaign by making people aware of the types of
6 campaigns. The -- these are all tools in the
7 toolbox.

8 **Q. Okay. And as one of those tools**
9 **that could be in the toolbox to stop the spread?**

10 MR. KIRSCHNER: Objection, vague.

11 MR. SAUER: Just asking.

12 MR. KIRSCHNER: Well, I don't know
13 what you're asking.

14 MR. SAUER: Okay.

15 A. Can you clarify what you mean by
16 stop the spread?

17 **Q. What does that mean to you, to stop**
18 **the spread of disinformation on social media?**

19 A. It could cover a huge range of
20 things. It could -- if there's an effective
21 refutation out there, that people read and find
22 compelling, they may stop sharing the propaganda
23 and disinformation that could stop the spread.

24 I -- could you clarify what you mean by it?

25 MR. SAUER: Why don't you give me

1 T?

2 Why don't we look at Exhibit 15.

3 (Exhibit No. 15 was marked for
4 identification.)

5 BY MR. SAUER:

6 Q. Have you seen this document before?

7 A. Yes, I believe so.

8 Q. Were you involved in drafting it?

9 A. I was not involved in drafting it.

10 Q. Did you have any input into its
11 formulation?

12 A. I believe I reviewed it, but I
13 didn't -- I didn't draft it or formulate it.

14 Q. When you reviewed it, did you
15 provide any input or edits or suggestions?

16 A. I don't recall whether I provided
17 input or suggestions.

18 Q. And this is titled: Functional
19 Bureau Strategy for the Global Engagement
20 Center; right?

21 A. Yes.

22 Q. And it's dated May 17 of 2022, this
23 year?

24 A. Yes.

25 Q. Who did draft this?

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1 A. I don't know.

2 Q. Is it a -- and it's on the GEC's
3 website; right?

4 A. Actually, let correct what I just
5 said. If this was released in May 17, 2022, I
6 may not actually have reviewed this version.
7 This is a document that I believe is
8 periodically updated. And just because I was
9 not at the Global Engagement Center in -- in
10 2022 I don't think that I would have reviewed
11 this. I would have reviewed a previous version,
12 so I didn't notice the date until just now.

13 Q. So this date would have been when
14 you were at the National Defense University?

15 A. Yes. Yes.

16 Q. Okay. Well, can you turn to -- how
17 about to the -- it's labeled page 2 of 17, it's
18 really the fourth page of the document.

19 A. Okay.

20 Q. And then there's a paragraph two
21 there that starts in the middle of the page,
22 called: Counter-disinformation technology?

23 A. Yes.

24 Q. And it talks about how technology
25 plays an important role in the problems and

1 solutions of propaganda and disinformation.

2 And the GEC works with government
3 and private sector stakeholders to identify the
4 needs and available tools to counter foreign
5 propaganda and disinformation; correct?

6 A. Yes, that's what it says.

7 Q. Is that all a fair and accurate
8 description of GEC's mission or goals?

9 A. Yes, I believe so.

10 Q. And the next sentence says:
11 Wherever possible, the GEC promotes integration
12 of appropriate technology or technologies to
13 support the mission; do you know what that's
14 talking about?

15 A. With the caveat that I was not --
16 with the caveat that I don't believe I was
17 involved in the drafting or approval of this
18 document, I -- I believe it's a reference to
19 using technology to carry out the GEC's mission
20 of countering propaganda and disinformation by
21 foreign state and non-state actors.

22 Q. And the next sentence says: The
23 GEC also partners with private technology
24 companies to stop the spread of disinformation
25 on social media; correct?

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

2 Q. What's it referring to?

3 MR. KIRSCHNER: Objection,
4 speculative.

5 BY MR. SAUER:

6 Q. How does the GEC partner with
7 social media companies or private technology
8 companies to stop the spread of disinformation
9 on social media?

10 A. I believe that would be through
11 meetings to discuss -- to share information
12 about the tools and techniques and campaigns and
13 narratives of foreign propaganda and
14 disinformation actors, to deepen the
15 understanding of those campaigns and actors for
16 the technology companies.

17 Q. How does deepening their
18 understanding help stop the spread of
19 disinformation?

20 A. It can help them to identify, for
21 example, coordinated inauthentic activity or to
22 understand what these actors are trying to
23 achieve, to understand the types of narratives
24 they are promoting, to understand the -- the --
25 the actors, the proxies, the tools, for example,

1 as listed in the Pillars of Disinformation
2 report, the elements in the Russian propaganda
3 ecosystem. All of those things are important
4 elements of understanding the problem.

5 Q. And so it promotes -- it's -- I
6 think you said it helps them identify certain
7 aspects of the problem and understand aspects of
8 the problem.

9 How, if the search or the
10 technology companies identify and understand
11 those aspects of the problem, does that stop the
12 spread of anything?

13 MR. KIRSCHNER: Objection,
14 speculative.

15 A. Solving a problem has to start with
16 understanding the problem, the elements of the
17 problem. The Global Engagement Center has an
18 important function, it's laid out in its
19 congressional legislation to identify and -- and
20 track what foreign propaganda and disinformation
21 actors are doing, and releasing, for example, a
22 public report on what Russian propaganda is
23 promoting that doesn't, in and of itself, stop
24 it, but it equips people, it equips, you know,
25 potentially technology companies to better

1 understand it so that they can take whatever
2 actions they would take to -- to -- to stop the
3 spread.

4 **Q. What actions could technology**
5 **companies possibly take to stop the spread once**
6 **they've been educated with this understanding**
7 **you described?**

8 MR. KIRSCHNER: Objection,
9 speculative.

10 A. I -- I can't speculate about all
11 the things a technology company can do.

12 **Q. Well, what do you -- your document**
13 **or GEC's document says: We partner with them to**
14 **stop the spread. You've recounted, in detail,**
15 **how you educate them and advance their**
16 **understanding and identification. I don't get**
17 **the next step, how does it stop the spread?**

18 MR. KIRSCHNER: Objection, asked
19 and answered.

20 A. You know, with the caveat that I
21 don't believe I was involved in drafting --

22 **Q. Sure.**

23 A. -- this document, including the
24 specific wording of stop the spread, but, for
25 example, you can label state-owned media as

1 being state-owned media. I know that some
2 social media companies have labeled Russia today
3 as this is a Russian state-owned entity.

4 And by labeling it, and, for
5 example, this is something that's listed in the
6 Pillars of Disinformation report that the GEC
7 released, you can then label that, and as people
8 see that, hopefully they'll be less likely to
9 forward it or share it, and that will help to
10 stop the spread.

11 **Q. So applying labels, the -- in other**
12 **words, GEC doesn't apply labels to anything on**
13 **social media; correct?**

14 A. No.

15 **Q. But it gives information to the**
16 **tech companies, and then they apply labels to**
17 **things or they can, if they want to, apply**
18 **labels to things to help stop the spread; is**
19 **that a fair characterization?**

20 A. In the case that I mentioned, the
21 GEC is not giving the information specifically
22 to tech companies. The Pillars of
23 Disinformation report was a public report that
24 anyone can access, anyone all over the world,
25 including a tech company, can access.

1 Q. Yeah, but that's your example. I'm
2 really talking about what they're saying here in
3 the document, where it talks about partnering
4 with private technology companies, that Russian
5 disinformation report, that was made available
6 to the whole world. That's not a specific
7 partnership with a private technology company;
8 correct?

9 I'm wondering how partnering a
10 private technology companies, and having these
11 meetings, like you're meeting with Twitter in
12 2021, and the other meetings that Mr. Stewart
13 set up and so forth, how do those -- and you
14 described that those meetings are involved in a
15 kind of information sharing and educational
16 function, how do they stop the spread?

17 A. Just to repeat, they help to deepen
18 the understanding so that a technology company,
19 just like a user, can take action. And they
20 take whatever action they deem is necessary.
21 The Global Engagement Center does not tee up
22 actions for social media companies to take.

23 Q. Did Mr. Dempsey ever tee up an
24 action for a social media company to take?

25 A. I -- I -- I don't know about

1 Mr. Dempsey.

2 Q. Alex Dempsey?

3 A. Alex Dempsey.

4 Q. Do you remember him from the 2020
5 e-mail chain we talked about earlier?

6 A. I -- I don't believe that chain
7 teed up an action. I don't believe it
8 recommended an action.

9 Q. So you don't view that Alex Dempsey
10 chain as teeing up an action; is that fair to
11 say?

12 MR. KIRSCHNER: Objection,
13 mischaracterizing the evidence.

14 MR. SAUER: I'm asking what he --
15 how he views the evidence.

16 BY MR. SAUER:

17 Q. You do not view that Alex Dempsey
18 is teeing up an action for social media
19 companies?

20 MR. KIRSCHNER: Objection, lack of
21 foundation, mischaracterizing the evidence.

22 MR. SAUER: I'm asking how he views
23 the evidence.

24 A. Well, did it request a specific
25 action?

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1 Q. I'm asking you whether you viewed
2 it as teeing up an action.

3 A. I don't recall that it requested a
4 specific action.

5 Q. So do you view it as not teeing up
6 something for -- for a specific action?

7 MR. KIRSCHNER: Objection, asked
8 and answered. That's just --

9 A. I don't recall it requesting a
10 specific action.

11 Q. Is it your view that if there's a
12 meeting between the GEC and social media
13 platforms, where no specific action is
14 requested, then you haven't teed up anything for
15 action?

16 A. Yes. I don't -- I don't believe
17 that the GEC requested specific actions of
18 social media companies.

19 Q. Could the GEC give social media
20 companies, for example, a briefing about how
21 content on their platforms is, you know,
22 violative of their platform policies, without
23 requesting removal?

24 MR. KIRSCHNER: Objection, vague.

25 A. The GEC would not brief a social

1 media company on their policies.

2 Q. Would it brief them on information
3 that -- that would relate to violations of their
4 policies?

5 A. Could you be -- could you clarify
6 that.

7 Q. Let me ask the question
8 differently.

9 Did anyone associated with the GEC
10 ever flag information -- or I'm sorry -- flag
11 content on a social media platform with the
12 intent of alerting them to information that
13 violates their policies?

14 MR. KIRSCHNER: Objection,
15 speculative and vague, ambiguous.

16 A. The only specific example that I
17 recall is the one that I gave you earlier, about
18 a threat to US personnel at a facility abroad.

19 Q. That's the 2018 example you talked
20 about?

21 A. Yeah, I believe it occurred in
22 2018.

23 Q. Do any of the -- there was a
24 reference in your previous statements to the 70
25 tools on the disinfo-cloud. Did any of those

1 tools relate to -- to content modulation in any
2 way or, I'm sorry, content moderation?

3 A. Right.

4 Q. Using the definition that you and I
5 agreed to a little while ago, do any of those
6 tools have any relationship with content
7 moderation?

8 A. I'm not familiar with the specifics
9 of all the tools.

10 Q. You don't know what -- are you
11 aware of any tools that do relate to content
12 moderation?

13 A. None that I can recall.

14 Q. Are you aware of any tools that
15 would, if used by a social media platform, make
16 it easier for them to identify content to
17 moderate?

18 MR. KIRSCHNER: Objection, vague,
19 ambiguous, speculative.

20 A. I don't know enough about the
21 specifics of how they conduct content moderation
22 to say what tools would or would not be useful.

23 Q. Some of the tools, at least, are
24 designed to assess content that's out there on
25 social media and try to identify foreign malign

1 **narratives within it; right?**

2 MR. KIRSCHNER: Objection, lack of
3 foundation.

4 BY MR. SAUER:

5 **Q. I thought that's what you said**
6 **earlier, can you tell me?**

7 A. I don't recall. I was giving an
8 example of what might be a tool. I don't recall
9 the specific tools on the platform.

10 **Q. So you don't recall the specifics**
11 **of any tool on that platform; is that right?**

12 A. No. I was not an active user of
13 the platform, no.

14 MR. SAUER: Can I have W?

15 I think it's going to be Exhibit 16
16 or 17? 16.

17 (Exhibit No. 16 was marked for
18 identification.)

19 MR. KIRSCHNER: Sorry, you said?

20 MR. SAUER: Yeah, is this -- I
21 think we're on 16.

22 MR. KIRSCHNER: Yeah, 16.

23 BY MR. SAUER:

24 **Q. Do you see this exhibit?**

25 A. I do.

1 Q. It's October 17, 2022 remarks to
2 the press by Secretary Blinken, the Secretary of
3 State?

4 A. Yes.

5 Q. Were you aware that he made these
6 comments or is this --

7 A. Not these specific comments, no.

8 Q. Can you turn to the second page?

9 A. Okay.

10 Q. Second full paragraph, after a
11 paragraph discussing collaborations with
12 Stanford, and partnerships with Silicon Valley
13 and so forth, the Secretary says: We also have
14 to be the ones who are at the table who are
15 helping to shape the rules, the norms, and the
16 standards by which technology is used.

17 Do you know what the Secretary's
18 referring to there?

19 MR. KIRSCHNER: Objection,
20 speculative.

21 BY MR. SAUER:

22 Q. Do you know?

23 A. I -- I don't know specifically. I
24 believe he's referring to international
25 organizations.

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1 Q. Okay. So why don't you -- what do
2 international organizations do to help shape the
3 rules, the norms, and standards by which
4 technology is used?

5 A. I'm not specifically familiar with,
6 the GEC was not a policy and is not a policy
7 shop. So I'm not specifically familiar with the
8 international organizations that shape the rules
9 and norms.

10 Q. Are you aware of any efforts by the
11 GEC to help shape the rules, the norms, and
12 standards by which technology is used?

13 A. As I said, the GEC is not a -- a
14 policy shop. I don't -- it does not have the
15 lead on -- on policy issues like this.

16 Q. Are you aware of any role of the
17 GEC, at all, on that?

18 A. To the extent that the GEC has a
19 role, I think it would be informing the
20 discussion through insight into the actions of
21 malign propaganda and disinformation actors.
22 It's not a policy office.

23 Q. How about elsewhere in the State
24 Department, what -- what -- what State
25 Department office would be involved in helping

1 **to shape the rules, the norms, and the standards**
2 **by which technology is used?**

3 MR. KIRSCHNER: Objection,
4 speculative.

5 A. I -- I believe there's a new
6 office, I don't recall the name. There's a
7 change in this area. I -- I -- you would have
8 to ask my colleagues at the department, but I
9 believe there is a new office for --
10 specifically for technology policy.

11 **Q. Was there a predecessor to that**
12 **office that you're familiar with?**

13 A. I believe that previously there
14 were two offices, and I don't -- I don't -- I
15 don't recall the specifics. We were not a
16 policy shop or a direct participant in policy
17 debates.

18 **Q. That technology policy office, is**
19 **it involved in interfacing with social media**
20 **platforms?**

21 MR. KIRSCHNER: Objection,
22 speculative.

23 A. I -- I -- I don't know what their
24 interactions are.

25 **Q. Can you flip ahead three more**

1 pages?

2 Sorry.

3 On the fifth page of the document,
4 do you see there, there's a question from
5 someone called Janelle, where she asks:
6 Stanford is one of the leading institutions to
7 combat misinformation research and pointing out
8 propaganda narratives and how they spread.

9 Are you familiar with Stanford
10 having that role?

11 MR. KIRSCHNER: Objection,
12 speculative.

13 A. I'm familiar with the Stanford -- I
14 think it's called the Stanford Internet
15 Observatory.

16 Q. Is that the SIO?

17 A. Yes.

18 Q. What do you know about them? How
19 are you familiar with them?

20 A. I'm familiar with them as a -- a
21 well-known research organization, like the -- I
22 think there's the Oxford Internet Institute.
23 There are a number of these research entities.

24 Q. Does GEC work with the SIO or the
25 Stanford Internet Observatory in any way?

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1 A. I don't recall whether we have a
2 specific interaction with -- specific
3 partnership with the Stanford Internet
4 Observatory.

5 **Q. So you don't know if there's**
6 **anything -- in what connection are you familiar**
7 **with them?**

8 A. My general familiarity with the
9 researchers and research in the field.

10 **Q. How do you get familiar with the**
11 **researchers in the field? Do you read the**
12 **reports or do people in GEC talk about stuff**
13 **that they're saying? Does GEC rely on their**
14 **reports in the research that it does or explain**
15 **that?**

16 MR. KIRSCHNER: Objection,
17 ambiguous, vague.

18 MR. SAUER: And compound.

19 MR. KIRSCHNER: And compound.

20 Thank you.

21 THE WITNESS: I -- I --

22 BY MR. SAUER:

23 **Q. Go ahead.**

24 A. I follow the news on -- and
25 research on issues related to the GEC's mandate.

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1 And I note some of the research institutes that
2 are -- that are -- that are producing it.

3 **Q. But do you know of any direct**
4 **involvement between any GEC people and the**
5 **Stanford Internet Observatory?**

6 A. I don't recall whether there was a
7 direct partnership. I simply don't recall.

8 **Q. How about the Atlantic Research**
9 **Council, have you ever heard of them?**

10 A. The Atlantic Council.

11 **Q. Yeah, Atlantic Council?**

12 A. All right.

13 **Q. Who are they, exactly?**

14 A. It's a Washington, D.C.-based think
15 tank.

16 **Q. Is it government funded or**
17 **privately funded or do you know?**

18 A. It's a mix, I believe.

19 **Q. Okay. And do you have any -- does**
20 **GEC have relationship with them?**

21 A. So I'm recused from -- starting in,
22 I think, early 2019 my wife is an employee at
23 the Atlantic Council, so I recused myself from
24 any Atlantic Council-related discussions in
25 2019. She's at the Eurasia Center at the

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1 Atlantic Council.

2 Q. Okay. How about Graphika, with a
3 K, are you familiar with that?

4 A. Yes, I am familiar with that.

5 Q. What are they, exactly?

6 A. I believe that they're a private
7 sector entity that does research in this area.

8 Q. Are they based in D.C., or where
9 are they based?

10 A. I don't recall where they're based.

11 Q. Does it -- are you aware of GEC
12 having a relationship with Graphika?

13 A. I don't recall whether GEC has a
14 direct relationship with Graphika.

15 Q. Okay. How are you familiar with
16 them?

17 A. I'm familiar with their general
18 research. I believe they released public
19 reports and I would see those the way I would
20 see reports that the Stanford Internet
21 Observatory would release.

22 Q. Any other -- any other direct
23 relationship between GEC and -- and them?

24 A. Not that I recall.

25 Q. Turning back to the document here

1 on the fifth page, the reporter asked the
2 Secretary: How do you envision the cooperation
3 between the State Department and institutions
4 like Stanford, and combatting the spread of
5 propaganda, and how does this fit within the
6 recently released national security strategy;
7 correct?

8 A. Yes.

9 Q. And the Secretary talks about
10 Stanford doing remarkable work on that, and we
11 want to be sure we're benefitting it, because
12 it's a day-to-day battle of combatting
13 misinformation and disinformation; right?

14 A. Right.

15 Q. And then he refers specifically to
16 your unit; right? He says: We have something
17 called the Global Engagement Center that's
18 working on this every single day; correct?

19 A. Yes.

20 Q. And that work is inspired by work
21 that's being done in academia, academia,
22 including here at Stanford, as well as, where
23 appropriate, collaborations; right?

24 A. Yes.

25 Q. So is he talking about your work,

1 **the GEC's work, being inspired by work being**
2 **done at Stanford?**

3 MR. KIRSCHNER: Objection,
4 speculative.

5 A. I -- I believe he's talking about
6 academic research that helps to inform the work
7 of the Global Engagement Center.

8 **Q. And are there collab- -- when he**
9 **talks about appropriate collaborations, are you**
10 **aware of any collaborations between the GEC and**
11 **academia?**

12 MR. KIRSCHNER: Objection,
13 speculative.

14 BY MR. SAUER:

15 **Q. Including, but not limited to,**
16 **Stanford?**

17 A. The GEC engages regularly with
18 researchers on foreign propaganda and
19 disinformation, some of whom are in academic
20 institutions.

21 **Q. Including the SIO, Stanford**
22 **Internet Observatory?**

23 A. I believe so, I'm not aware of the
24 specifics of the interactions with all the
25 institutions, but yes, like the SIO.

1 Q. But you believe there are --
2 Mr. Kimmage, you don't know specifically whether
3 there's direct interaction with the SIO, but
4 generally it's overdue for the GEC to have
5 direction interactions with research
6 institutions like the SIO?

7 MR. KIRSCHNER: Objection, vague,
8 assumes evidence not in record.

9 BY MR. SAUER:

10 Q. Correct?

11 A. The GEC stays abreast of current
12 research in -- in the field, and meets
13 periodically with the researchers, yes.

14 Q. Okay. And then the Secretary goes
15 on to say: One of the things we have to do is
16 to make sure that we're using technology,
17 itself, to deal with some of the downsides of
18 technology when it's misused, including when it
19 comes to misinformation and disinformation?

20 A. Mm-hmm.

21 Q. Do you know what he's talking
22 about, how is the State Department using -- or
23 the GEC, which he's referred to two sentences
24 earlier -- using technology, itself, to deal
25 with the downsides of technology when it comes

1 **to misinformation and disinformation?**

2 MR. KIRSCHNER: Objection,
3 speculative.

4 A. So I don't know, specifically, what
5 the Secretary is referring to, here, but the
6 Technology Engagement Team at the Global
7 Engagement Center engages with people who are
8 developing tools that would help to identify and
9 counter propaganda disinformation. I believe
10 those are the types of engagements that he's
11 referring to.

12 MR. KIRSCHNER: Counsel, do you
13 know how much longer?

14 MR. SAUER: Why don't we take a
15 five-minute break.

16 MR. KIRSCHNER: Okay.

17 MR. SAUER: And I will use that
18 time to see whether and to what extent I have
19 more to go over.

20 THE VIDEOGRAPHER: The time is 4:19
21 p.m. We're off the record.

22 (Recess.)

23 THE VIDEOGRAPHER: The time is 4:32
24 p.m. We're back on the record. Please proceed.

25 MR. SAUER: We have -- plaintiffs

1 have no further questions for this witness at
2 the time.

3 MR. KIRSCHNER: The defendants have
4 no questions, either. And we believe that this
5 is closed. And this is Mr. Kimmage's --
6 completion of Mr. Kimmage's deposition for this
7 case.

8 MR. SAUER: His first deposition
9 for this case.

10 MR. KIRSCHNER: No, this is the
11 close of his deposition, and that we would
12 object to any other further reopening of his
13 deposition.

14 MR. SAUER: If that issue ever
15 comes up, I'm sure we'll take it up at that
16 time. So is that the end?

17 THE VIDEOGRAPHER: With that --

18 MR. KIRSCHNER: Before -- before
19 the close of it, we would like to read and
20 review the transcript for him to -- and sign
21 before --

22 MR. SAUER: Sure. And we're going
23 to be asking for expedited, if that's available.
24 I know I'd asked for Monday, I don't know if
25 that's feasible.

1 THE REPORTER: It's fine.

2 MR. SAUER: Thanks.

3 THE VIDEOGRAPHER: Okay. And with
4 that, that concludes the deposition of Daniel
5 Kimmage. The time is 4:33 p.m. We're off the
6 record.

7 (Signature having not been waived,
8 the deposition of DANIEL KIMMAGE was concluded
9 at 4:33 p.m.)

10 ACKNOWLEDGMENT OF DEPONENT

11 I, DANIEL KIMMAGE, do hereby acknowledge
12 that I have read and examined the foregoing
13 testimony, and the same is a true, correct and
14 complete transcription of the testimony given by
15 me and any corrections appear on the attached
16 Errata sheet signed by me.

17

18

19 _____
(DATE)

(SIGNATURE)

20

21

22

23

24

25

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1 CERTIFICATE OF SHORTHAND REPORTER
2 I, Cassandra E. Ellis, Registered
3 Professional Reporter, the officer before whom the
4 foregoing proceedings were taken, do hereby
5 certify that the foregoing transcript is a true
6 and correct record of the proceedings; that said
7 proceedings were taken by me stenographically and
8 thereafter reduced to typewriting under my
9 supervision; and that I am neither counsel for,
10 related to, nor employed by any of the parties to
11 this case and have no interest, financial or
12 otherwise, in its outcome.

13 IN WITNESS WHEREOF, I have hereunto set
14 my hand this 14th day of November 2022.

15

16

17

18 _____
19 CASSANDRA E. ELLIS, CSR-HI, CSR-VA, CCR-WA, RPR,

20 CRR

21 REALTIME SYSTEMS ADMINISTRATOR

22 NOTARY PUBLIC

23

24

25

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1 LEXITAS LEGAL

2

3 November 14, 2022

4

5 ADAM KIRSCHNER, ESQUIRE
6 DEPARTMENT OF JUSTICE
7 1100 L STREET, NORTHWEST
8 WASHINGTON, D.C. 20530

7

8 IN RE: STATE OF MISSOURI, et al. v. JOSEPH R.
9 BIDEN, JR. , et al.

9

10 Dear ADAM KIRSCHNER:

11 Please find enclosed your copies of the deposition of
12 DANIEL KIMMAGE taken on November 10, 2022 in the
13 above-referenced case. Also enclosed is the original
14 signature page and errata sheets.

15 Please have the witness read your copy of the
16 transcript, indicate any changes and/or corrections
17 desired on the errata sheets, and sign the signature
18 page before a notary public.

19 Please return the errata sheets and notarized
20 signature page within 30 days to our office at 1608
21 Locust Street, Kansas City, MO 64108 for filing.

22 Sincerely,

23

24 Lexitas Legal

25 Enclosures

1	ERRATA SHEET
2	Witness Name: DANIEL KIMMAGE
3	Case Name: STATE OF MISSOURI, et al. v. JOSEPH R. BIDEN, JR. , et al.
4	Date Taken: NOVEMBER 10, 2022
5	Page # _____ Line # _____
6	Should read: _____
7	Reason for change: _____
8	
9	Page # _____ Line # _____
10	Should read: _____
11	Reason for change: _____
12	
13	Page # _____ Line # _____
14	Should read: _____
15	Reason for change: _____
16	
17	Page # _____ Line # _____
18	Should read: _____
19	Reason for change: _____
20	
21	Page # _____ Line # _____
22	Should read: _____
23	Reason for change: _____
24	
25	Witness Signature: _____

DANIEL KIMMAGE 11/10/2022

1 STATE OF _____)

2

3 COUNTY OF _____)

4

5 I, DANIEL KIMMAGE, do hereby certify:

6 That I have read the foregoing deposition;

7 That I have made such changes in form

8 and/or substance to the within deposition as might

9 be necessary to render the same true and correct;

10 That having made such changes thereon, I

11 hereby subscribe my name to the deposition.

12 I declare under penalty of perjury that the

13 foregoing is true and correct.

14 Executed this _____ day of _____,

15 20____, at _____.

16

17

18

19

20

DANIEL KIMMAGE

21

22

23

NOTARY PUBLIC

24 My Commission Expires:

25

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