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1 IN THE UNITED STATES DISTRICT COURT
2 FOR THE NORTHERN DISTRICT OF GEORGIA
3 ATLANTA DIVISION

4 DONNA CURLING, ET AL., :
5 :
6 PLAINTIFFS, :
7 vs. : DOCKET NUMBER
8 : 1:17-CV-2989-AT
9 BRAD RAFFENSPERGER, ET AL., :
10 :
11 DEFENDANTS. :

12 **TRANSCRIPT OF BENCH TRIAL - VOLUME 4 PROCEEDINGS**

13 **BEFORE THE HONORABLE AMY TOTENBERG**

14 **UNITED STATES DISTRICT SENIOR JUDGE**

15 **JANUARY 12, 2024**

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21 ***MECHANICAL STENOGRAPHY OF PROCEEDINGS AND COMPUTER-AIDED***

22 ***TRANSCRIPT PRODUCED BY:***

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P R O C E E D I N G S

(Atlanta, Fulton County, Georgia; January 12, 2024.)

THE PLAINTIFFS' CASE (Continued).

THE COURT: Good morning. Have a seat.

You remember that you are still under oath?

THE WITNESS: Yes, ma'am.

THE COURT: All right. Ready to begin?

MR. CROSS: Yes.

THE COURT: Okay.

MR. CROSS: Thank you, Your Honor.

Whereupon,

RYAN GERMANY,

after having been previously duly sworn, testified as follows:

CROSS-EXAMINATION (Continued)

BY MR. CROSS:

Q. Good morning, Mr. Germany.

A. Good morning.

Q. And I think the Judge just confirmed.

You understand you are still under oath?

A. Yes, sir.

Q. And just quickly, have you spoken with anyone about your testimony or any of the issues in this case since you left the stand yesterday?

A. I spoke with the lawyers.

1 Q. What lawyers?

2 A. I spoke with Ed Bedard and Vincent Russo.

3 Q. And what did you speak with them about?

4 MR. BEDARD: Objection, Your Honor, to the extent it
5 calls for attorney-client privileged information. I don't
6 think he's laid a foundation.

7 Frankly, I think Mr. Cross and his attorneys have
8 been talking with their witnesses throughout the case as well
9 during breaks.

10 MR. CROSS: Let's just be clear. That is a very
11 serious accusation that you should not make.

12 Hold on. Hold on. Hold on.

13 THE COURT: Wait a second.

14 MR. CROSS: Number two, there is no privilege. This
15 man was on the stand. They are not allowed to speak with him
16 regarding issues in the case, the substance of his testimony.
17 That was the question.

18 We're entitled to explore that. And I will assure
19 the Court, we have not once spoken with a witness about the
20 substance of their testimony or any issue in this case.

21 THE COURT: During the course of their testimony?

22 MR. CROSS: During the course of their testimony,
23 exactly. We are entitled to know exactly what was discussed.

24 MR. BEDARD: For the record, Your Honor, we haven't
25 talked about his --

1 MR. CROSS: You don't get to testify, Mr. Bedard,
2 please. He answers the questions.

3 MR. BEDARD: He can ask better questions. You are
4 lodging serious objections at us, Counsel, as well. So I
5 would --

6 THE COURT: All right. Sir, did you talk about the
7 substance of your testimony?

8 THE WITNESS: They told me I did great, I was doing
9 great, basically; you know, just here's things we think they
10 might get into going forward.

11 BY MR. CROSS:

12 Q. And what did they say?

13 MR. BEDARD: Again, objection, Your Honor.
14 Attorney-client privilege.

15 MR. CROSS: You don't get to do this when a witness
16 is on the stand.

17 THE COURT: But you cannot interrupt. You cannot
18 interrupt. If you -- I mean, the testimony is supposed to be
19 unvarnished by further repair by counsel. So, you know, that
20 is -- that is what his -- that is the concern.

21 MR. RUSSO: We understand that, Your Honor. It is
22 not about repairing testimony. That wasn't -- you know, we
23 told him good job. You know, tomorrow you're going to be on
24 the stand longer.

25 THE COURT: Can you get the --

1 MR. RUSSO: We talked -- we said -- encouraged him,
2 said good job, you know, speak to the Judge, the types of
3 things that you advise witnesses, not about the content of his
4 testimony yesterday in terms of -- in terms of trying to repair
5 testimony. That is not -- that is not the substance of the
6 conversation.

7 MR. CROSS: The rules are unequivocal. When a
8 witness takes the stand, you may not speak with them about
9 their testimony. It is an ethics rule. We are officers of the
10 court. We are entitled to know what this man was told to
11 prepare for his testimony today. It is not privileged.

12 He himself is a lawyer. I suspect he knows this.

13 THE COURT: Do you contend otherwise, Counsel?

14 MR. RUSSO: That -- I'm sorry?

15 THE COURT: Do you -- do you disagree with the
16 summary of what Mr. Cross provided as what the ethics rules
17 provide?

18 MR. RUSSO: In terms of sequestration, Your Honor?

19 THE COURT: That is right.

20 Well, sequestration -- about talking with the
21 witnesses who is in the process of his testimony or her
22 testimony.

23 MR. RUSSO: Your Honor, I don't know that I can give
24 my thought on that right now. I want to, of course, look at
25 all -- look at the rule Mr. Cross is referring to.

1 But I do think that there have been plenty of
2 witnesses who had discussions during breaks, and one even came
3 back up and retestified a couple of days ago after -- after he
4 finished, you may recall.

5 THE COURT: Right.

6 MR. RUSSO: And so, you know, I'm not saying that
7 changes anything as to Mr. Germany, of course. I think that,
8 you know, Mr. Germany's conversations with us, there's really
9 nothing in those conversations that I have too much concern
10 about, to be quite honest with you.

11 I think that, you know, repairing testimony is very
12 different than trying to repair his testimony if that is what
13 the concern is. It is very different than encouraging a
14 witness to, you know, speak -- answer the questions, don't get
15 upset on the stand, you know, speak to the judge, kind of the
16 basic things of --

17 THE COURT: Well, those things, of course, this
18 witness probably would know anyway.

19 MR. RUSSO: Yeah, right. I understand.

20 THE COURT: Well, I am going to -- if there -- you
21 can ask what the topics were, but not further at this point,
22 and we'll deal with it further, so I don't want -- later on, if
23 you want to, since you want to provide the concerns and just
24 sort of reference the ethics rule separately at a later time,
25 perhaps either today or later just so that we all get -- talk

1 about this in advance.

2 But, I mean, because also Mr. Germany is an attorney,
3 I would think he would be conscious of what the scope of what
4 he can and cannot do while he is a witness on the stand.

5 But I will deal -- we'll deal with it later, other
6 than that you will be allowed to ask him what the topics were.

7 BY MR. CROSS:

8 Q. Mr. Germany, you mentioned that counsel talked to you
9 about what you might expect to be questioned about today.

10 What were those topics?

11 A. The Dominion contract.

12 Q. Anything else?

13 A. I'm sorry?

14 Q. Anything else?

15 A. No.

16 Q. Any other topics that were discussed with counsel?

17 A. Other than just that -- that I was doing a great job and
18 just kind of basic. I don't feel like it was anything
19 substantive about testimony, just sort of some of the --

20 I do know these things, Your Honor. But as someone who
21 has to kind of serve kind of on both sides, it definitely -- it
22 is appreciated to be reminded of those things. And it actually
23 is quite helpful. Things like, you know, just try to stay
24 calm, speak clearly.

25 Those things, like you said, I do know, but they are

1 helpful to be reminded of.

2 **Q.** Any other topics discussed with your counsel?

3 **A.** Not that I can recall.

4 **Q.** Thank you, sir.

5 Okay. If you can grab -- do you still have the exhibits
6 from yesterday, or do we --

7 **A.** I don't have them.

8 MR. CROSS: We can just pull it up.

9 Tony, will you pull up 582, please.

10 BY MR. CROSS:

11 **Q.** Just a few follow-up questions on this.

12 MR. CROSS: Thank you, Mr. Martin.

13 BY MR. CROSS:

14 **Q.** Just to get our heads back to where we were yesterday.
15 This is the Interrogatory Response 15. You can see here where
16 it indicates that we asked State defendants, quote, to describe
17 with specificity each successful or attempted instance of
18 unauthorized access to or copying or alteration of the
19 following, and then there is equipment.

20 Do you see that?

21 **A.** I'm sorry. I couldn't -- I didn't quite hear the sentence
22 you read.

23 **Q.** The second paragraph, sir, the second sentence of the
24 second paragraph.

25 **A.** I see that.

1 Q. Okay. And do you recall yesterday there was a statement
2 made by the State defendants' counsel that if we had concerns
3 about the language in this or the response we should have
4 raised it at the time? Do you recall that?

5 A. A statement by?

6 Q. Mr. Bedard said we should have raised it at the time if we
7 were concerned about this.

8 A. I recall that.

9 Q. Okay.

10 MR. CROSS: May I approach, Your Honor?

11 THE COURT: Yes.

12 MR. CROSS: Did I give you one that is marked up?

13 BY MR. CROSS:

14 Q. Just briefly on this, Mr. Germany, so you have in front of
15 you Exhibit 584. If you flip to the --

16 THE COURT: Is it 584 or 582?

17 MR. CROSS: 584. 582 was the rog response.

18 THE COURT: All right.

19 BY MR. CROSS:

20 Q. So if you look at Exhibit 584 and turn to the
21 third-to-last page, it is Page 17 of 19.

22 A. Yes.

23 Q. Do you see there's an email from my colleague Tamara
24 Wiesebron on October 12th of 2021, to Mr. Russo and others?

25 A. I see that.

1 Q. And if you look at the substance of her email on the next
2 page, do you see she writes, per the Court's directive, we have
3 significantly narrowed the interrogatories that were the
4 subject of our last discovery conference.

5 She is sending these interrogatories over and in the last
6 sentence asks for full and complete answers by October 21.

7 A. I see that.

8 Q. And then if you come back a couple of pages, you'll see
9 there is an email on October 14th from Mr. Russo.

10 A. Yes.

11 Q. If you look at the body of his email --

12 THE COURT: What page is that?

13 MR. CROSS: Page 16 of 19.

14 THE COURT: Okay.

15 BY MR. CROSS:

16 Q. And if you come to the body of his email at the top of
17 Page 17, in the last paragraph he writes, we will not be
18 responding to your revised interrogatories by your October 21
19 deadline; however, we would like to avoid another discovery
20 dispute.

21 And he asked us to propose narrowly tailored
22 interrogatories.

23 Do you see that?

24 A. He asked -- Vincent asked you to propose that?

25 Q. Yes.

1 Do you see that?

2 **A.** Yes, I see that.

3 **Q.** Then come to Page 14, if you would, please.

4 **A.** Yes.

5 **Q.** Do you see that I respond to Mr. Russo on October 15?

6 **A.** Yes.

7 **Q.** And in my email I write, these are very narrow in scope.
8 In fact, we would hope and expect that the vast majority could
9 be answered very succinctly, such as for Number 15.

10 You understand Number 15 is the one we've been looking at
11 in Exhibit 582; right, sir? Do you recall that that was
12 numbered Interrogatory 15?

13 **A.** Yes, I'll take your word that that is what this is
14 referring to.

15 MR. RUSSO: Your Honor, I'm going to object to the
16 relevance of this. I think he may be getting somewhere, and
17 that is fine if that is where we're going. But we've got
18 several witnesses that are supposed to be coming up today.
19 This is -- discovery is --

20 THE COURT: I don't think it is just a discovery
21 dispute, I think, that he is trying to get into. I think it is
22 something -- but I'm going to allow him to proceed. I don't
23 know what -- you know, where he is going, but he is entitled to
24 examine -- it kind of relates to a vital piece of information,
25 so I'm trying to understand where we're going.

1 MR. CROSS: It won't take long, Your Honor.

2 THE COURT: All right, sir.

3 BY MR. CROSS:

4 Q. So, Mr. Germany, can you see here I reference specifically
5 Number 15 and said that, perhaps you could simply state
6 unequivocally that there have been no successful or attempted
7 instances of unauthorized access to or copying or alteration of
8 data on any specific election equipment or devices identified
9 since Georgia adopted the Dominion BMDs if that is accurate
10 based on your client's knowledge and a diligent investigation
11 per the requirements of the Federal Rules?

12 Do you see that?

13 A. I see that.

14 Q. And as a lawyer, you understand that in responding to
15 discovery responses there is, in fact, an obligation to answer
16 based on the client's knowledge and a diligent investigation;
17 right, sir?

18 A. Yes.

19 Q. And then if you come to Page 13, you see Mr. Russo
20 responds on October 15. In the last sentence he indicates that
21 you guys would rereview the interrogatories and respond
22 further. He asked us to further narrow them.

23 Do you see that?

24 A. Which sentence are you referring to?

25 Q. The last sentence of his email.

1 THE COURT: It is highlighted on the screen.

2 MR. CROSS: Yeah.

3 THE WITNESS: I see that sentence.

4 BY MR. CROSS:

5 Q. Okay. Now, if you come forward to Page 10 -- I'm going to
6 skip over some intervening emails -- you see we get to
7 October 21 an email from Mr. Russo at the bottom of Page 10.

8 If it is easier, my colleague is highlighting things on
9 the screen for you.

10 A. It is not really easier. It is still a lot easier for me
11 to see it in front of me. Thank you.

12 I see that.

13 Q. And he says, attached are our responses to each of the
14 revised interrogatories.

15 Do you see that?

16 A. Yes.

17 Q. And so on October 21st, as we discussed yesterday, we
18 received Exhibit 582. And then you'll see the bottom of
19 Page 8, if you can jump there.

20 Do you see that I sent an email to Mr. Russo on
21 October 22nd of 2021?

22 A. Yes.

23 Q. Actually, I'm sorry. Look at the bottom of Page 9, if you
24 would. Sorry.

25 A. Okay.

1 Q. And I sent an email on October 21st to Mr. Russo.

2 Do you see that?

3 A. Yes.

4 Q. Okay. This is the part that I wanted to get to.

5 I wrote, thanks, Vincent. We need a verification from
6 your clients for these responses.

7 You see that?

8 A. I see that.

9 Q. And then the next sentence I wrote on 15, it is unclear
10 what you mean by hacked -- which is quotes -- and whether
11 that's narrower than what we asked. Can you please send by
12 close of business tomorrow an answer to that request stating
13 whether the State has knowledge of any successful or attempted
14 instance of unauthorized access to or copying or alteration of
15 data on any equipment used with the Dominion election system?

16 Do you see that?

17 A. I see that.

18 Q. And then jumping to the bottom of Page 8 into Page 9, you
19 will see that I followed up on that question on October 22nd.

20 Do you see that?

21 A. Yes, I see that.

22 Q. Then on Page 8, months later on January 6, not having
23 heard from State defendants, do you see that I followed up
24 again?

25 A. Yes.

1 Q. And if you come to Page 7, Mr. Russo responds asking for
2 clarification.

3 Do you see that?

4 A. Yes.

5 Q. I responded the same day, reminding him of the issue with
6 Interrogatory 15 and the question about the word hacked.

7 Do you see that at the top of Page 7?

8 A. I see that.

9 Q. And I'll cut to the chase. You're welcome to flip through
10 the rest of it. You'll see that we get to January 11, and we
11 never get a response from the State defendants with a
12 verification at the time, but more importantly, what they meant
13 by hacked and whether it was something different than we asked.

14 There is no response to that in this.

15 Do you see that?

16 And you're welcome to flip through it.

17 A. There is no response to what?

18 Q. To the question whether they meant something different by
19 hacked than the answer we posed in the interrogatory.

20 A. Do you want me to review the rest of it?

21 Q. You are welcome to flip through it. And if you see where
22 Mr. Russo or anyone else for the State responded to that
23 question, I would ask you to direct me to it.

24 A. Well, I have to read that to answer.

25 Q. Sure.

1 THE COURT: Counsel, would you be so kind as to point
2 me to where I will find the interrogatory again that is -- or
3 where is the specific language of it?

4 MR. CROSS: It is Exhibit 582.

5 Tony, do you want to pull it up so she has it in
6 front of her?

7 MR. RUSSO: That's the response.

8 MR. CROSS: Oh, sorry. You wanted the request, not
9 the response. They quote part of it, but we can pull up the
10 whole response.

11 Is that 581?

12 Yeah. This is the actual request they responded to,
13 Number 15.

14 THE COURT: And this is the narrowed version?

15 MR. CROSS: Yes, Your Honor. Again, they quote the
16 key language in that first paragraph in their response, which
17 confirms.

18 THE WITNESS: Thank you.

19 What was the question again?

20 BY MR. CROSS:

21 **Q.** There is no point in that thread where Mr. Russo responded
22 to our question of whether the word hacked meant something
23 other than what we asked in Interrogatory Number 15; is that
24 right, sir?

25 **A.** I didn't see anything like that.

1 Q. Thank you.

2 Now, I want to talk a little bit more about what you and
3 the State defendants knew at the time that you answered this
4 interrogatory.

5 Going back to the summer of 2021, specifically May of
6 2021, you recall that we looked at the email from Mr. James
7 Barnes alerting the Secretary's office to the Cyber Ninjas
8 card; right?

9 A. Yes.

10 Q. And not only did you guys open the investigation into
11 whether there was access into the equipment, but the
12 Secretary's office actually took two key pieces of voting
13 equipment from Coffee County at that time; right?

14 A. I don't know -- I don't think that is -- I don't recall
15 when the EMS in Coffee County was changed. I believe it was --
16 well, I shouldn't say. But the reason that EMS was changed,
17 the election management server, was not due to anything
18 regarding that Cyber Ninjas card. That was due to the
19 elections director couldn't get access to it and needed it.

20 And those are done in two separate -- you know, the
21 Investigations is one division of the Secretary of State's
22 office.

23 And then the election management server change was done by
24 the Center for Election Systems by Michael Barnes and his team.

25 So those two things were not related, in my view.

1 Q. Those two things were not related, in your view?

2 A. Yes, sir.

3 Q. As general counsel of the Secretary's office, it didn't
4 occur to you at the time that they might be related?

5 MR. BEDARD: Objection, Your Honor. I think it
6 misstates his testimony.

7 THE COURT: I don't think it does.

8 So go ahead.

9 THE WITNESS: No. They were very different things.
10 The election management server was changed out because at some
11 point -- and I don't recall the exact date -- the new election
12 supervisor in Coffee County alerted Michael Barnes and said --
13 and I'm kind of testifying to what I recall from memory, not,
14 you know, sort of exact -- hey, we can't get into our election
15 management server and that you have to have access to that as
16 a -- kind of election supervisor to run an election, to
17 administer an election.

18 So I believe that came up, you know, as they were
19 preparing to administer an election. I don't recall exactly
20 when.

21 And so at that point, Michael Barnes sends a tech
22 down -- because a lot of times when that happens, there might
23 be some, you know, mistake. I think there was a newer
24 elections director too, and Michael and his team can help the
25 county get the access that they need. It might be a password

1 issue or something like that.

2 In this case -- and when they go on those sales
3 calls -- or not sales calls, but kind of tech support calls to
4 a county, my understanding is they always bring a spare server
5 just in case they can't resolve the issue and they -- but they
6 want to be able to leave the county with a working server.

7 And so that is what happened. Michael's tech -- I
8 think it was Chris Bellew who I know and who is a good person
9 at CES.

10 BY MR. CROSS:

11 **Q.** Mr. Germany, I'm sorry to interrupt but we are way far
12 afield of what I asked.

13 Do you recall the question I asked you?

14 **A.** You asked me if they were related.

15 **Q.** No, sir. I said, did it occur to you, did you consider
16 the fact that they might be related, yes or no?

17 **A.** I did not think they were related.

18 And I guess one thing I'm trying to point out, I'm not
19 sure the timing really works out for that either, but I can't
20 recall.

21 **Q.** You don't recall that the EMS server was replaced on
22 June 8?

23 **A.** I don't.

24 **Q.** And you don't recall that James Barnes alerted the
25 Secretary's office in the April, early May time frame to not

1 being able to access the server the exact same time frame that
2 he alerted your office to the Cyber Ninjas card?

3 **A.** I recall the time frame of the Cyber Ninjas card notice
4 from yesterday. I don't recall the other one that you are
5 referring to.

6 **Q.** Okay. Well, we're going to grab a document to help
7 refresh your memory on that.

8 MR. CROSS: Let me -- while we do that --

9 **(There was a brief pause in the proceedings.)**

10 MR. CROSS: Can you pull up 130, please?

11 BY MR. CROSS:

12 **Q.** Have you seen Exhibit 130 or a document like this?

13 **A.** I think I've seen something like this. This would be more
14 in Michael Barnes' kind of area of expertise.

15 **Q.** So you're aware that when voting equipment like an EMS
16 server is installed in a county, the acceptance testing is done
17 on it; right?

18 **A.** Yes.

19 **Q.** And are you aware -- take a step back.

20 You testified yesterday that you had significant
21 involvement working with your outside counsel with respect to
22 this case in discovery; right?

23 **A.** Yes.

24 **Q.** Are you aware that your counsel represented to us and the
25 Court that this is the acceptance testing document that shows

1 that the EMS server in Coffee County was replaced on June 8 of
2 2021, because it was not accessible?

3 **A.** I see that. I see it as June 8th, 2021.

4 **Q.** Do you have any reason to believe that this is not the
5 acceptance testing that was represented to the Court?

6 **A.** No.

7 **Q.** So does this help refresh your recollection that the EMS
8 server was replaced around the same time that the Cyber Ninjas
9 card was raised with your office and your office opened an
10 investigation?

11 **A.** Yes.

12 **Q.** Now, you said, in your mind, it did not occur to you that
13 these events might be related.

14 Have you -- did you review any of the deposition testimony
15 in this case as it developed?

16 **A.** I don't know that I reviewed specific transcripts or
17 anything like that.

18 **Q.** Were you aware that James Barnes, the superintendent in
19 Coffee County at the time we've been talking about, testified
20 under oath that he understood the EMS server was replaced
21 because there was a concern that it had been compromised; if it
22 has been compromised in any way, he cannot use it in an
23 election?

24 **A.** I'm not aware of that.

25 **Q.** And it is still your view that these were unrelated?

1 **A.** At the time, yes, it did not -- I did not think of them as
2 related. I thought of the EMS server replacement as responding
3 to the issue that Mr. Barnes could not get access to the server
4 that he needed to run elections.

5 And then separately, you know, he did alert us to the
6 Cyber Ninjas, and he alerted -- with the EMS server, he would
7 have alerted Mr. Barnes, I think, Mr. Michael Barnes. With the
8 Cyber Ninjas card, he alerted Chris Harvey.

9 **Q.** But you were aware of both incidences having occurred and
10 being addressed at the same time in the May, June 2021 period;
11 right, sir?

12 **A.** I was aware of the -- to the best of my recollection at
13 this point, I recall Chris Harvey letting me know something
14 about a Cyber Ninjas card.

15 Again, to me, that wasn't like, oh, this is a four-alarm
16 fire and if we had perhaps had additional information -- which
17 I understand now existed that we didn't actually have that the
18 plaintiffs had access to -- then I think we could have done,
19 you know, maybe -- maybe there could have been more pieces of
20 the puzzle put together at that point.

21 But back at the time, it wasn't -- I don't recall --

22 **Q.** Mr. Germany, I'm sorry to interrupt. They are very
23 simple, straight questions, and we're going to be here a long
24 time with speeches, so let me ask me the question again.

25 **A.** With all due respect, sir, I took -- I have to tell the

1 whole truth and the complete truth.

2 **Q.** And you will have all the time in the world to do that.

3 **A.** Well, I have to do that now.

4 **Q.** Mr. Germany, you understand how court works. Let me come
5 back to my question. It is yes or no.

6 Isn't it true, sir, that in the May 2021 time period, you
7 knew, you were aware that two things were happening in your
8 office at the same time involving Coffee County? An
9 investigation involving Cyber Ninjas' potential access to
10 voting equipment and that the EMS server was being replaced
11 because it was no longer accessible?

12 You knew that; correct, sir?

13 **A.** What I was about to get to --

14 **Q.** Is the answer yes?

15 **A.** What I was about to get to --

16 **Q.** Is the answer yes?

17 THE COURT: You have to answer yes or no.

18 THE WITNESS: The answer is no. The answer is no.

19 BY MR. CROSS:

20 **Q.** You didn't know about either of those things?

21 Go ahead. Go ahead. Let's hear it.

22 **A.** Could you repeat the question?

23 I feel like that was kind of not a fair kind of reckoned
24 recount of what I said.

25 THE COURT: The court reporter will just simply read

1 over the question again.

2 **(The record was read back by the court**
3 **reporter.)**

4 THE WITNESS: No, that is not correct. To my
5 recollection, I do recall, like I was saying, of Chris Harvey
6 telling me about the Cyber Ninjas card. I don't recall Michael
7 Barnes telling me about replacing the server.

8 I think -- and based on my recollection of kind of
9 what I did learn about it, which I don't know when that was,
10 that that was viewed from the -- going down to Coffee County to
11 replace the server.

12 And again, they were going down, not to -- not to
13 replace the server, to try to respond to the call that
14 Mr. James Barnes had made to Michael Barnes to say, hey, I
15 can't get in this server.

16 So I don't think that Chris Bellew, who I think was
17 the tech who went down there, was going down there with the
18 impression, oh, I need to replace this server. I think it was,
19 hey, we have a county with an issue with a server.

20 That is not, you know -- that is something that CES
21 responds to regularly. That's not a, oh, this is some big
22 thing that needs to be sort of risen up through the ranks of
23 the Secretary of State's office.

24 So -- and then when Chris Bellew went down there, was
25 not able to get access to the server, then that was replaced.

1 But I don't think the two things, especially in the
2 minds of Chris and Michael who were doing that, were related to
3 any investigation.

4 BY MR. CROSS:

5 **Q.** Can you give the Court any time frame at all as to when
6 you learned that the EMS server was replaced in Coffee County?

7 **A.** I can't right now.

8 **Q.** You just testified that Chris Bellew going down to
9 potentially replace the EMS server was something that CES
10 responds to regularly; right?

11 **A.** Well, what I think I said was --

12 **Q.** I just asked you if you said that.

13 Do you recall saying that?

14 **A.** What I think I said, what I --

15 **Q.** We can read it back if you'd like.

16 **A.** What I said -- I'll tell you what I said. What I said was
17 what CES regularly responds to is counties having an issue with
18 the server maybe not being able to get in.

19 My understanding is that, generally, that is something
20 that is able to be resolved, you know, by CES at kind of the
21 technical level, just helping a county with a password or
22 something like that. I don't think he went down there to
23 replace the server.

24 And as I testified earlier, from what I have learned from
25 Michael, they do, as a matter of course, bring a spare server

1 with them on those types of calls just so they can make sure
2 they leave the county with a working server.

3 MR. CROSS: Okay. Well, I'll move to strike that as
4 hearsay and nonresponsive.

5 BY MR. CROSS:

6 Q. Let's talk about what --

7 MR. CROSS: Oh, I'm sorry.

8 THE COURT: All right. It is hearsay. I'll just
9 consider that it is hearsay and therefore not admissible.

10 But it does -- he is explaining his course of conduct
11 at the same time, and that is what you have asked about.

12 MR. CROSS: Yes. Thank you, Your Honor.

13 BY MR. CROSS:

14 Q. So Mr. Barnes testified in this trial.

15 Do you understand that?

16 A. Yes.

17 Q. And are you -- well, you've been sequestered, so you
18 wouldn't know this.

19 But he testified that the State actually very rarely
20 replaces physical devices for election equipment, that that
21 happens between the county and Dominion.

22 Are you aware that that is the process of how it is
23 supposed to work?

24 A. Generally, I think that's correct. I do know that the
25 State keeps some spare equipment in case something needs to be

1 replaced on an expedited level or expedited, I should say, time
2 frame.

3 **Q.** But generally, you agree with Mr. Barnes that the State
4 doesn't regularly replace equipment, that that is for -- if
5 there are issues, the counties are supposed to contact
6 Dominion, and there is a specific process for dealing with
7 that; right? Do you disagree with him?

8 **A.** I would probably have to know more context, exactly.
9 Michael is very good at what he does, so I would be hesitant to
10 disagree with him.

11 **Q.** And isn't it true that the State has never replaced,
12 except in Coffee County, an EMS server because of
13 inaccessibility? It is the only time it has ever happened;
14 right?

15 **A.** I can't say.

16 **Q.** Mr. Sterling testified in his deposition, on how many
17 prior occasions has the State replaced an EMS server for a
18 county in the Dominion system that was inaccessible?

19 His answer, because of an inaccessibility, none that I'm
20 aware of other than this one.

21 Do you have any reason to believe that Mr. Sterling is
22 mistaken?

23 **A.** I don't know one way or the other.

24 **Q.** So as you sit here, you can't identify any other instance
25 where a -- the State replaced an EMS server because it was no

1 longer accessible in the current BMD system; is that fair?

2 **A.** I cannot identify that.

3 **Q.** You testified yesterday that you helped negotiate
4 including vetted some of the terms of the State's contract with
5 Dominion; right?

6 **A.** What was the second part? Helped negotiate and what?

7 **Q.** I thought you said you had input into some of the terms in
8 that contract.

9 **A.** I did have input, yes.

10 **Q.** And unauthorized access to the Dominion equipment in
11 Georgia puts Georgia in breach of its Master Solution Purchase
12 and Services Agreement with Dominion; right, sir?

13 **A.** I would have to review it.

14 MR. BEDARD: Objection. I would just object to that
15 question to the extent it calls for a legal conclusion, Your
16 Honor. We can look at the contract itself and have an argument
17 about that.

18 MR. CROSS: Can you pull it up, please?

19 THE WITNESS: Is it possible for me to get another
20 water?

21 MR. CROSS: Oh, sure. Sure.

22 THE WITNESS: Thank you.

23 MR. CROSS: Tony, can you go to Page 2? Next page.

24 BY MR. CROSS:

25 **Q.** Mr. Germany, take your time to read the email for a

1 moment, but I'll just direct your attention to the email from
2 Bryan Tyson to me on August 31st of 2020.

3 Do you see that?

4 **A.** I see that.

5 **Q.** And do you recall that in the September 2020 preliminary
6 injunction hearing, Dr. Halderman did an in-court demonstration
7 where he showed how you could hack the BMD system using
8 equipment that was provided by Fulton County?

9 **A.** I recall -- I recall that.

10 **Q.** Let me ask a better question. I think it will be easier.

11 You're aware that in the August, September 2020 time
12 frame, Fulton County provided a BMD and some other components
13 to Dr. Halderman that he has analyzed; right?

14 **A.** I believe there was a court order ordering Fulton County
15 to provide certain access.

16 **Q.** Yes.

17 And so we were negotiating that with the other side here
18 in August 31st of 2020. And if you come down to the last
19 paragraph of Mr. Tyson's email, he writes, but your scope and
20 proposals raise a larger concern given the breadth of the
21 information you are seeking and the unfettered access to the
22 entirety of the election system. Even if this was feasible, it
23 would place Georgia in breach of its Master Solution Purchase
24 and Services Agreement with Dominion.

25 Do you see that?

1 **A.** Yes.

2 **Q.** And while you were in the Secretary's office as the
3 general counsel, did you ever come to a view on whether the
4 breach in Coffee County, the multiple breaches in Coffee County
5 constituted a breach of the Master Solution and Purchase and
6 Service Agreement with Dominion?

7 **A.** I don't recall ever doing an analysis like that.

8 **Q.** Have there been any discussions between the State and
9 Dominion regarding the Coffee County breaches?

10 **A.** Yes.

11 **Q.** What has been discussed?

12 **A.** Well, what would happen in Coffee County has obviously
13 been a subject of much discussion in the Secretary of State's
14 office. And when something comes up that involved Dominion
15 equipment, then we -- we discuss it with Dominion pretty
16 regularly.

17 I don't recall ever any discussions about, oh, this is a
18 potential breach of the contract. Dominion has been a good
19 partner with the State. We try to be a good, you know, partner
20 with them too to make sure we can all kind of run a good
21 election.

22 So I certainly don't recall any of that discussion of us
23 being in breach due to what happened in Coffee County coming
24 up.

25 **Q.** The communications between your office, when you were at

1 the Secretary's office, and Dominion, do you know if there were
2 emails, for example, that went back and forth on the Coffee
3 County breaches?

4 **A.** I don't know if there were emails.

5 **Q.** So as you sit here, with something of the magnitude of the
6 Coffee County breaches, is it your belief or your memory that
7 every communication with Dominion regarding their equipment was
8 oral?

9 **A.** Well, I can speak to the communications I know about. I
10 mean, there could be other ones, but I would say, generally, my
11 communications with Dominion are over the phone just because,
12 frankly, it is stuff that is easier to discuss over the phone.

13 **Q.** And so as you sit here, you can't recall ever sending a
14 single email -- you are not aware of anyone having any email
15 exchange with Dominion regarding the breaches in Coffee County?

16 **A.** I am not aware of that. That would be the type of topic
17 that would generally call for a phone discussion just based on
18 the nature because it is --

19 **Q.** Why?

20 **A.** -- because it is back and forth, it is complicated, it is
21 trying to figure out and discuss, and it is -- it is not sort
22 of -- that has been my -- I know in my discussions at least, it
23 has been something, hey, let's call, and I want to run
24 something by you, what do you think? That type of thing.

25 **Q.** So it doesn't surprise you or concern you that the State

1 has produced not one written communication with Dominion
2 regarding the breaches in Coffee County?

3 **A.** We talk to Dominion a lot, so I would say we're in good
4 communication. I don't -- it doesn't surprise or concern me;
5 correct.

6 **Q.** Can you identify any other instance from your own personal
7 knowledge where someone from CES went to a county elections
8 office where there was a report that the EMS server was not
9 accessible and they brought with them an actual EMS server
10 sitting in a vehicle?

11 **A.** My understanding from Michael Barnes is that is something
12 they do regularly on calls like that, that that is --

13 **Q.** My question to you is: As you sit here, can you -- are
14 you aware of your own personal knowledge of any specific
15 instance where that has ever happened before?

16 MR. BEDARD: Objection, Your Honor. Asked and
17 answered. I think he asked this about 15 or 20 minutes ago.

18 THE COURT: No. He has -- what he has reported each
19 time is his understanding from Michael Barnes, and I think it
20 is a different -- and he has still not answered the actual
21 question.

22 THE WITNESS: My understanding on how CES does stuff,
23 all of that would come through Michael Barnes.

24 THE COURT: But you don't have any personal
25 understanding, you are saying?

1 THE WITNESS: My knowledge comes from I talk to
2 Michael Barnes about what they do. I'm not in -- they are in a
3 separate physical office than us.

4 So yeah, it is discussions with the people that run
5 that office. That is how my understanding is reached.

6 BY MR. CROSS:

7 **Q.** I showed you a moment ago the -- the acceptance testing
8 document that was represented to the Court corresponds to
9 replacing the EMS server in Coffee County.

10 Do you recall that?

11 **A.** Yes.

12 **Q.** Does it surprise you that the State has also represented
13 it has no other documents, not one document concerning
14 replacing that EMS server even though, as Mr. Sterling
15 testified, it has never been done before or since?

16 **A.** I recall discussing with Michael Barnes what documentation
17 they have regarding --

18 **Q.** I'm not asking you to offer me hearsay.

19 I'm just asking: Does it surprise you that the State has
20 not any documents beyond the generic acceptance testing? Just
21 yes or no, does it surprise you?

22 **A.** Well, based on my discussions with Michael Barnes and how
23 they generally do stuff, it does not.

24 **Q.** So that is consistent with your understanding of how the
25 State -- the documentation it would or would not create when it

1 is replacing a server in that context?

2 **A.** My understanding is yes, that is the documentation that is
3 created.

4 **Q.** Another thing that the State did in May of 2021 in the
5 context of everything we've talked about is go out and hire a
6 forensic expert named James Persinger; right?

7 **A.** I can't recall when we hired Mr. Persinger. I thought it
8 was prior to that in regards to this litigation. I guess I
9 shouldn't say we hired. He would have been an expert in this
10 litigation prior to that.

11 **Q.** Okay.

12 MR. CROSS: Tony, can you pull up Exhibit 467,
13 please?

14 BY MR. CROSS:

15 **Q.** So, Mr. Persinger -- I'm sorry.

16 Mr. Germany, you'll see on the screen -- do you see a
17 document entitled Declaration of James Persinger?

18 **A.** Yes.

19 MR. CROSS: And, Tony, can we go to the signature
20 page at the end?

21 BY MR. CROSS:

22 **Q.** And you'll see here it is signed by James Persinger under
23 oath on November 10th of 2022?

24 **A.** Yes.

25 MR. CROSS: And then if you come back out to the full

1 screen, Tony.

2 BY MR. CROSS:

3 **Q.** If you look at the top, do you see the little legend at
4 the top indicates that it was actually filed with the Court on
5 February 14 of 2023?

6 **A.** I see that.

7 **Q.** Now, if we jump to Paragraph 11 on Page 5 of 23, do you
8 see here, does that refresh -- and you can read this.

9 Does this refresh your recollection that Mr. Persinger was
10 retained by Mr. Russo on May 20 -- on or about May 21st of
11 2021?

12 **A.** Yes, I see that.

13 **Q.** And specifically to provide digital forensic and technical
14 consulting services?

15 **A.** Yes.

16 **Q.** And do you have any reason to believe that this is not
17 accurate?

18 **A.** No.

19 **Q.** Okay. So in May of 2021, the Secretary's office is
20 alerted that Cyber Ninjas, potentially, they are opening an
21 investigation into whether they had potentially accessed the
22 voting equipment, which Mr. Harvey said would be his worst
23 fear. You've also -- the office also replaced the EMS server,
24 which had never been done before and has never been done since.
25 This is in the context of a county that already had had an open

1 investigation for election-related issues, and your litigation
2 counsel hired a forensic expert specifically to provide digital
3 forensic and technical consulting services, litigation counsel
4 in this case.

5 MR. BEDARD: Objection, Your Honor.

6 BY MR. CROSS:

7 Q. Those are the facts; right, sir?

8 MR. BEDARD: Objection, Your Honor, to hearsay.

9 Mr. Germany recalled that we had hired Mr. Persinger.

10 Mr. Cross is relying on his out-of-court declaration from

11 Mr. Persinger for the scope of his engagement. He can call

12 Mr. Persinger if he would like, but Mr. Germany just recalls

13 only that he was hired, not to the scope of his engagement or

14 anything like that, so --

15 THE COURT: Well, I haven't heard that, so -- from --

16 I mean, he is entitled to explore it. He is entitled to try to

17 refresh the witness' memory, and that is what he is doing. So

18 he may proceed.

19 THE WITNESS: So I would disagree with one of the

20 ways you characterized something in that we did have knowledge

21 of Cyber Ninjas' card on Misty Hampton's desk. I certainly did

22 not see that, and I don't think other people did either, that,

23 oh, this is evidence that they were there.

24 I think it was something that required that we then

25 looked into, but it was based on a card being on a desk. For

1 instance, I have lots of business cards in my desk from people
2 that have never been in my office.

3 BY MR. CROSS:

4 **Q.** Do any of the business cards you have on your desk, are
5 they from folks who are known publicly to have tried to access
6 voting equipment or otherwise engage in unlawful behavior?

7 **A.** I can't really answer that.

8 **Q.** Okay. Well, I mean, let's just be clear. In May of 2021,
9 it was publicly known that Cyber Ninjas was trying to get
10 access to voting equipment.

11 You recall that; right, sir?

12 **A.** Yes.

13 **Q.** This isn't a random business card from a coffee vendor or
14 someone who sells sandwiches.

15 We're not talking about that; right? Yes?

16 **A.** I'm sorry?

17 **Q.** You're not suggesting that this particular business card
18 in this particular context was trivial, that it was just like
19 any other business card you might find on your desk; right?
20 You're not suggesting that?

21 **A.** The only thing I think you said, oh, we had evidence Cyber
22 Ninjas was there. And we didn't -- I thought that is what you
23 said, so if you didn't --

24 **Q.** I apologize then. I apologize. Let me -- I'll read the
25 question back.

1 So in May of 2021, the Secretary's office is alerted that
2 Cyber Ninjas potentially -- let me ask it again.

3 MR. CROSS: You're doing a great job, Shannon, and
4 that is realtime. Sorry.

5 BY MR. CROSS:

6 **Q.** Let me ask the question again. Let me try again.

7 So in May of 2021, the Secretary's office is alerted that
8 Cyber Ninjas was potentially there, potentially there, and
9 opened an investigation into whether they had potentially
10 accessed the voting equipment, which Mr. Harvey said was his
11 worst fear. The office also replaced the EMS server, which had
12 never been done before and has never been done since. This is
13 in the context of a county that had already had an open
14 investigation for election-related issues. And your litigation
15 counsel hired a forensic expert specifically to provide digital
16 forensic and technical consulting services, and that's your
17 litigation counsel in this case.

18 Those are the facts; right?

19 MR. BEDARD: Objection, Your Honor. Again, assumes
20 facts that, one, aren't in evidence; two, that he has already
21 testified he doesn't have personal knowledge of. There is a
22 whole string of things in there he said he doesn't have
23 personal knowledge of.

24 THE COURT: Why don't we go over, since there seems
25 to be a dispute of what he has knowledge over. Even if we have

1 to look at the documents presented by -- that you introduced to
2 Mr. Harvey.

3 MR. CROSS: Okay. Understood. I was trying to keep
4 it efficient.

5 THE COURT: Do you want a few minutes' break to try
6 to do that? Pull it -- pull that together?

7 MR. CROSS: That's okay. I can move on, Your Honor.

8 THE COURT: I realize the significance of the
9 questions at the same time, and, you know, partially also
10 because we had a break between, obviously, the testimony
11 yesterday and today, I'm just concerned that -- that it would
12 be easier to review again any of the -- you're summarizing what
13 you think you've established. I can't necessarily remember
14 whether you presented -- you know, what has been copied to who
15 because some of that came out yesterday, so --

16 MR. CROSS: That's okay, Your Honor. I can withdraw
17 the question because I do feel confident that is in the record.
18 So we'll move on.

19 THE COURT: All right.

20 MR. CROSS: Thank you.

21 BY MR. CROSS:

22 **Q.** Mr. Germany, we talked a little bit about the open
23 investigation into Coffee County that started in December of
24 2020; right? Do you recall that?

25 **A.** Yes, sir.

1 Q. And do you recall or were you aware that Investigator
2 Blanchard was assigned to that investigation?

3 A. Yes.

4 Q. And you understand that he actually went down to Coffee
5 County multiple times; right?

6 A. Yes.

7 Q. And he spoke with -- met with Misty Hampton and
8 potentially others; right?

9 A. I mean, I would -- I don't know -- I would assume that he
10 met with Misty based on kind of his general practices.

11 Q. Are you aware that at one point when Investigator
12 Blanchard was there in January of 2021, when he went into the
13 election office that Jeffrey Lenberg was in Misty Hampton's
14 office at the moment Investigator Blanchard went in?

15 A. I became aware of that at some point.

16 Q. And do you recall when you became aware of that?

17 A. It was in this litigation, and I think it was -- I believe
18 that was public also, and there was videos released, and there
19 was news articles about it, and that would have been when I
20 became aware of that.

21 Q. And in your role as general counsel, do you know whether
22 anyone else in the Secretary's office was alerted to that at or
23 around the time that it occurred in January of 2021?

24 A. I don't think when that occurred that Blanchard realized
25 that that was something of significance.

1 Q. So I'm just asking -- I'm not asking --

2 A. So I don't think anyone was -- I don't think -- I don't
3 think he was aware of that, and I don't think -- if he wasn't
4 aware of it, he certainly couldn't alert anybody to it.

5 Q. Okay. All right. So let's fast-forward to the spring of
6 2022 when these issues started to unfold. And again, we
7 mentioned yesterday -- you stated to the Court under oath that
8 the Secretary's office had no information about the allegations
9 of a potential breach in Coffee County before March of 2022.

10 Do you recall that?

11 A. I would say we didn't have knowledge of it until then. I
12 mean, looking back, there are some pieces that I wish we had
13 put together differently, and I think we could have put them
14 together differently if we had additional information that we
15 later got, but it certainly wasn't something that we were aware
16 of or thought that occurred prior to that.

17 And frankly, when I first heard about it from the call
18 between Ms. Marks and Scott Hall, that, to me, didn't establish
19 that it had occurred because I was aware of Mr. Hall making a
20 lot of claims about the 2020 election that did not turn out to
21 be true.

22 Q. So once you learned about this, one of the first things
23 that the State did was to bring someone in from Dominion to try
24 to access the EMS server in the spring of 2022 in April in
25 particular.

1 Do you recall that?

2 **A.** Correct. That was my -- I think that was my kind of
3 thought process in terms of trying to figure out what happened
4 given the fact that we knew Mr. Hall, from previous
5 investigations and a lot of his previous allegations, had
6 turned out not to have -- not to be true. It didn't seem like
7 the best way to figure out what happened would be just to ask
8 him. So I do think that was kind of my suggestion of, let's
9 try to figure out what happened forensically before we start
10 talking to people who we think might not be honest with us.

11 So yes, and I think the way we first tried to do that was
12 through Dominion.

13 **Q.** And so in April of 2022, Nicole -- is it Nollette,
14 N-O-L-L-E-T-T-E? Am I saying her last name right? Do you
15 know?

16 **A.** Yeah. Pretty close, as far as I know. Nicole -- what is
17 her last name? Nolette?

18 **Q.** N-O-L-L-E-T-T-E. Is it Nolette?

19 **A.** Nicole Nollette. Yes, sir.

20 **Q.** So was it your decision or were you involved in a decision
21 to bring in Ms. Nollette to try to access the system, the EMS
22 server?

23 **A.** Nicole is -- I believe she's chief operations officer at
24 Dominion or something like that. So we worked through Nicole,
25 but I think she was talking with other people. I don't think

1 she's the one doing the technical work on the Dominion side.

2 MR. CROSS: Tony, can you pull up Tab 15, please?

3 BY MR. CROSS:

4 Q. So, Mr. Germany, do you see here a declaration --
5 declaration of Ryan Germany?

6 A. Yes.

7 MR. CROSS: And if we go to Page 3, Tony.

8 BY MR. CROSS:

9 Q. Do you see your signature on this?

10 A. Yes. Yes.

11 Q. If we come up on Page 3, you state here in Paragraph 7,
12 the item Nicole Nollette from Dominion purchased to attempt to
13 access the Coffee County EMS server in spring of '22 was a
14 digital -- a Western Digital Easystore two terabyte portable
15 drive.

16 Do you see that?

17 A. Yes.

18 Q. Does it refresh your recollection that in the spring of
19 2022, Ms. Nollette herself actually came to your office, tried
20 to access it, even went to Best Buy to buy a piece of equipment
21 to do that?

22 A. My recollection is so Nicole would have gone to Center for
23 Election Systems office and where the Coffee County server was.
24 And so I think she was personally there, and I don't recall if
25 she had other people with her or if she might have been talking

1 to other people from Dominion on the phone.

2 **Q.** But you recall that she came to some Secretary of State's
3 office facility where the EMS server was and tried to access it
4 in the spring of 2022?

5 **A.** Yes.

6 **Q.** And she was unable?

7 **A.** Correct.

8 **Q.** Are you aware that the data that sits on the Dominion EMS
9 server as it is -- as it is taken from Coffee County -- that
10 the data itself is not encrypted?

11 **A.** I couldn't speak to that.

12 MR. CROSS: Can you pull the declaration up again?

13 BY MR. CROSS:

14 **Q.** If we go to Paragraph 8, you wrote here, when assisting
15 with trying to obtain access to the Coffee County EMS server,
16 Ms. Nollette does not recall the issue of whether or not the
17 EMS server was encrypted ever coming up with anyone at SOS or
18 whether she advised anyone the encryption status of the server.

19 Do you see that?

20 **A.** Yes.

21 **Q.** Does that help refresh your memory at all about the issue
22 of encrypted data coming up with respect to this server?

23 **A.** I mean, it refreshes my recollection as to -- as to this
24 specific thing. I think that would have been true just based
25 on knowledge at the time. But in terms of the technical issue,

1 that is not something that I recall.

2 **Q.** So in the spring of 2022, no one -- the Secretary's office
3 was not able to get access to the Coffee County EMS server; is
4 that right?

5 **A.** Correct.

6 **Q.** And are you aware today that a simple Google search would
7 have pulled up a YouTube video that would have shown anyone in
8 your office how to get access to the data on that within
9 minutes?

10 **A.** I'm not aware of that.

11 **Q.** Do you know whether anyone in or associated with the
12 Secretary's office in the spring of '22 undertook any efforts,
13 any research about how they might access this server other than
14 asking Ms. Nollette to do it?

15 **A.** My recollection is there was discussions with Dominion
16 about what is the best way to do this. And -- and that was how
17 that -- I'm not familiar with sort of the specifics of what
18 they discussed.

19 MR. CROSS: Tony, can we get Exhibit 181?

20 BY MR. CROSS:

21 **Q.** All right. Mr. Germany, still in the April 2022 time
22 frame, do you see Exhibit 181 there is an email that you sent
23 to Steven Ellis on April 1st of 2022?

24 **A.** Yes.

25 **Q.** And if you flip to -- I'm sorry.

1 MR. CROSS: Tony, let's go to Page 2.

2 BY MR. CROSS:

3 Q. The first email in this thread comes from Rachel Roberts,
4 who at the time was the election superintendent in Coffee
5 County.

6 Do you recall that?

7 A. I don't recall Rachel, but I don't dispute what you just
8 said.

9 Q. You don't have any belief -- you don't have any reason to
10 believe she was not the election supervisor in April of 2022 in
11 Coffee County; right?

12 A. I really can't say one way or the other.

13 Q. Okay. And so she writes to -- is it Pratik Patel?

14 A. Yes.

15 Q. In your office -- and is it Mr. Patel?

16 A. I believe so.

17 Q. Is Mr. Patel in CES?

18 A. Yes.

19 Q. And so she writes --

20 MR. BEDARD: Objection, Your Honor. To the extent
21 Mr. Cross is going to read this into the record, it is hearsay.
22 Mr. Germany is not even on this email.

23 MR. CROSS: He's at the top of it.

24 MR. BEDARD: But it is still -- it is the underlying
25 email, Your Honor. He is not on it. He is not having a

1 conversation in it. Even if he was, it would still be hearsay
2 because it is not his statement.

3 MR. CROSS: There is no assertion of truth here. She
4 has a question.

5 MR. BEDARD: But he is still reading it into the
6 record, Your Honor.

7 THE COURT: Well, he is allowed to read the predicate
8 question that he is going to be trying to pursue. I mean, it
9 is not -- it is not -- there is no way of his asking the
10 question of being able to pursue this otherwise. So it may be
11 that he knows --

12 This is silly. You can go ahead and -- I mean,
13 whether it is true or -- the question was, can you please send
14 me a letter on your letterhead stating that our server is in
15 your possession?

16 And that is sent from one person to the next. I
17 don't know what -- and please include why and when it was
18 changed out.

19 I don't know what -- enough of what this is about,
20 but it is not provided for the truth -- it is basically here --
21 he is asking him a question about this course of
22 communications.

23 Thank you. Go ahead with that in mind.

24 BY MR. CROSS:

25 Q. Mr. Germany, do you see Ms. Roberts asks this individual

1 in CES, can you please send me a letter on your letterhead
2 stating that our server is in your possession?

3 Do you see that?

4 **A.** Yes.

5 **Q.** And the server was in the State's possession at this
6 point; right?

7 **A.** Yes.

8 **Q.** And she also says, please include why and when it was
9 changed out.

10 Do you see that?

11 **A.** Yes.

12 **Q.** And to your knowledge, the State never provided the letter
13 that she requested here; right, sir?

14 **A.** I don't know.

15 **Q.** As you sit here, you can't represent to the Court that
16 this -- that a letter that she requested was provided? You
17 have never seen such a letter; is that fair?

18 **A.** Correct. Not to my recollection.

19 **Q.** And then if you come further up, you can see Mr. Patel
20 from CES responds to her and adds Steven Ellis.

21 Do you see that?

22 **A.** Yes.

23 **Q.** Steven Ellis was an attorney who reported to you when you
24 were the GC?

25 **A.** Yes.

1 Q. Then if we come to the first page at the bottom, Mr. Ellis
2 forwards this to you on April 1st, the same day, of 2022.

3 Do you see that?

4 A. Yes.

5 Q. And then you respond to him, I just left a message with
6 Coffee County's attorney. Let's work through her.

7 Did you see that?

8 A. Yes.

9 Q. And what efforts did you undertake in April of 2022 in
10 coordinating with Coffee County's attorney in dealing with this
11 response to Ms. Roberts, if anything?

12 A. I can't recall specifically dealing with this response. I
13 was -- I reached out to Coffee County's Attorney -- Jennifer
14 Herzog is who I was speaking to and -- about this issue in
15 general about what happened at Coffee County and just trying
16 to, you know, really figure out what it was. And I had found
17 her, I think, in some discussions to be, you know, helpful and
18 trustworthy.

19 Q. Ms. Herzog you communicated with over the phone sometimes;
20 is that fair?

21 A. Yes.

22 Q. Sometimes in text messages?

23 THE COURT: I'm sorry. Ms. Herzog is the --

24 MR. CROSS: Oh, I'm sorry. Let me lay that
25 foundation.

1 BY MR. CROSS:

2 Q. Jennifer Herzog is an attorney that represents Coffee
3 County, the election board?

4 Why don't you explain her role.

5 A. Yeah, probably -- I'm not sure if she represents the board
6 specifically or kind of the county attorney, and then the board
7 is sort of a division of the county.

8 Q. But you reached out to her as counsel for Coffee County in
9 some capacity; is that fair?

10 A. Correct.

11 Q. And so you communicated with her by phone.

12 You also communicated with her by text messages; is that
13 right?

14 A. Yes. And probably by email as well.

15 Q. Yes.

16 And when this email came to your attention from
17 Ms. Roberts, did you encourage Ms. Herzog to ask her client not
18 to send further communications on this?

19 A. I can't recall.

20 Q. You just don't recall one way or the other whether you
21 said that?

22 A. Correct.

23 Q. All right. So let's take a look at Exhibit 585. If you
24 see at the top, this is an email that you received from
25 Ms. Herzog on July 15 of 2022.

1 Do you see that?

2 **A.** Yes.

3 MR. CROSS: Now, if we come down to the bottom of
4 this page, Tony.

5 BY MR. CROSS:

6 **Q.** Do you see, Mr. Germany, there is an email again from
7 Rachel Roberts July 14, 2022, to individuals at the Secretary's
8 office with the subject voting machines.

9 **A.** Yes, I see that.

10 **Q.** Blake Evans, at this time, he was the election supervisor
11 for the State?

12 **A.** The elections director, yes.

13 **Q.** Thank you.

14 Here, she asks another question. If you could come to her
15 email. Since it has been published that the former elections
16 supervisor gave access to voting machines, do they need to be
17 recertified?

18 Do you see that?

19 **A.** Yes.

20 **Q.** Mr. Evans forwarded this on to you, Gabriel Sterling, and
21 Michael Barnes on the same -- the next day on July 15.

22 Do you see that?

23 **A.** Yes.

24 **Q.** And then you forwarded it on to Ms. Herzog; right?

25 **A.** Yes.

1 Q. Which Ms. Herzog responded, bless. Inaccurate obviously.
2 I will speak with her.

3 Do you see that?

4 A. Yes.

5 Q. Do you know what she was referring to as inaccurate when
6 you received her response? Did you think to yourself, what is
7 inaccurate?

8 A. I think at that point we were still kind of investigating,
9 okay, what happened?

10 I'm not sure what Jennifer knew. I think -- bless, I
11 think, is probably short for bless her heart, as you probably
12 know. But I think -- I think it was more so like -- I could
13 just say my interpretation was, well, we're still trying to
14 figure out what happened. Sometimes there are news reports
15 that aren't always accurate.

16 So that is how I took it.

17 Q. And do you recall that by July 15 of 2022, Mr. Persinger
18 had already shared with you that he had found evidence that a
19 Samsung device had been connected to the Coffee County EMS
20 server, a device that should not show up on that server?

21 A. I recall learning that in -- yeah, around July.

22 Q. And as you sit here, you can't point us or the Court to
23 any response to Ms. Roberts' question of whether the machines
24 needed to be recertified? You're not aware of any response to
25 her; right?

1 **A.** At some point -- I don't recall exactly when -- I know we
2 just replaced the machines.

3 THE COURT: You what?

4 THE WITNESS: We replaced the machines in Coffee
5 County at some -- it would have been subsequent to July.

6 BY MR. CROSS:

7 **Q.** Do you recall that that was -- it was September 26 or
8 so -- does that sound about right? -- of 2022?

9 If you don't remember, that is fine.

10 **A.** I don't know if I can say, but that could be right.

11 THE COURT: Counsel, I'm -- about the communications
12 with the -- Ms. Herzog, are those being introduced or you're
13 just --

14 MR. CROSS: Yes.

15 THE COURT: And have they already been agreed upon?

16 Because I just don't know whether I have them, so I'm
17 just trying to follow the conversation.

18 MR. CROSS: So the -- let me make sure I get them
19 right. Sorry, Your Honor. I should have done this in
20 realtime. So Exhibit 181 and the other is Exhibit 585. We
21 move both into evidence.

22 THE COURT: 181 and what?

23 MR. CROSS: 585 was the last one.

24 THE COURT: And are those in the -- in this notebook
25 in connection with this witness?

1 MR. CROSS: Yes. Tabs 18 and 22.

2 THE COURT: I don't have anything under 18, or maybe
3 I have an earlier version.

4 MR. CROSS: I'm sorry, Your Honor?

5 They are Tabs 18 and Tab 22.

6 THE COURT: This is Mr. Barnes'. I'm sorry.

7 MR. CROSS: Oh, do you need another -- I'm sorry,
8 Judge. We can hand you those.

9 Give Mr. Germany one if he wants one.

10 MR. BEDARD: David, I'm sorry. On these notebooks,
11 it was Tabs --

12 MR. CROSS: Oh, 18 and 22.

13 MR. BEDARD: Your Honor, as far as moving the
14 exhibits, obviously we would reiterate our hearsay objection.
15 But beyond that, no objection except, I think, for 22, it is
16 not stamped, so I'm not sure it was on the pretrial order. I'm
17 not necessarily saying we will totally object to that at this
18 moment, but I just want to note that maybe we can have a
19 conversation offhand if you guys have additional exhibits to
20 add.

21 And for what it is worth, I think that is true of
22 some of the interrogatory responses as well now that I know
23 that.

24 THE COURT: You mean they are not stamped, but they
25 are on their list? Is that what --

1 MR. BEDARD: I believe my understanding is they are
2 not on their list, but I also understand we supplemented our
3 pretrial exhibit list maybe a week and a half ago. Honestly,
4 I'm losing track of time. We had a discussion with counsel
5 about that.

6 So again, I'm not necessarily objecting. I'm more
7 just noting it so counsel and I can have a discussion maybe
8 during the break.

9 THE COURT: All right. Well, Exhibit 181 is
10 admitted. It is impossible to understand this without getting
11 the course of communications. I don't think that the question
12 sent to -- from Mr. Ellis to Mr. Germany is hearsay. It is
13 really just asking him a question. It is not -- it is clearly
14 a business record. And they are discussing the request by
15 Ms. Roberts. There is no question that that is a business
16 record too. And no one here disputes the fact that Ms. Roberts
17 sent this letter.

18 So it doesn't seem -- a hearsay objection in this
19 context seems not appropriate.

20 Then the other one was -- I'm sorry. 20 --

21 MR. CROSS: 22. Wait, sorry. Tab 18, Your Honor,
22 and that is Exhibit 181.

23 THE COURT: All right. I was talking about 181.

24 MR. CROSS: Oh, I'm sorry. Then go to Tab 22.

25 THE COURT: So that is at -- then I --

1 MR. BEDARD: I believe 585.

2 THE COURT: I don't have a 22. I have a 21.

3 MR. CROSS: They are out of order. If yours --
4 sorry. I shifted stuff around. 22 should be between 18 and
5 19.

6 THE COURT: 22, I'm sorry.

7 MR. CROSS: I'm sorry. That's my fault.

8 THE COURT: That is the bless one --

9 MR. CROSS: Yes.

10 THE COURT: -- that Mr. Ryan received?

11 And then there is the one that below it which is the
12 communication with Mr. Evans and Mr. Germany and others of high
13 level, plus Mr. Michael Barnes.

14 These are clearly business records. No one is really
15 saying that they are not -- they are not -- don't truthfully
16 reflect the communications. So as to bless, there is not a
17 problem. Then Ms. Herzog's, I don't -- really don't know all
18 that she means by not accurate.

19 Obviously, I will speak with her, but it is obviously
20 a reflection of the communication she had with Mr. Germany and
21 that he says he was having ongoing communications.

22 So I think it is admissible for purposes of the
23 communication that he received from her in regard to a matter
24 that was important, but I don't know what was intended about
25 not accurate, obviously.

1 MR. CROSS: Candidly, Your Honor, we're not offering
2 that for the truth of the matter anyways.

3 THE COURT: All right. It is being admitted for
4 purposes of the communication that occurred.

5 MR. CROSS: The, I will speak with her, that part I
6 think is admissible under the bases Your Honor says, but it
7 also goes to state of mind because it is her future intent
8 indicating the action she will take.

9 THE COURT: All right.

10 MR. CROSS: Okay. Tab 23.

11 BY MR. CROSS:

12 Q. So this is going to be Exhibit 586.

13 Mr. Germany, if you look on the cover, it says Exhibit G.
14 Do you see that?

15 A. Yes.

16 Q. And if you look at the top, you'll see that this was filed
17 with the Court on July 29 of 2022.

18 Do you see that?

19 A. Yes.

20 Q. And if you come to the first page of it, you'll see that
21 there is an email that you received from Steven Ellis that was
22 directed to Jennifer Herzog on July 21st of 2022.

23 A. Yes, I see that.

24 Q. And if you come to the bottom of Page 2 of Exhibit 586, do
25 you see that the thread begins with an email that you sent to

1 Ms. Herzog, Anthony Rowell, copying your colleague Steven Ellis
2 on July 20, '22 -- sorry, let me say again -- July 20, 2022?

3 **A.** Yes, I see that.

4 **Q.** And the subject line you wrote was Coffee County SEB
5 Investigation?

6 **A.** Yes.

7 **Q.** And Anthony Rowell, do I understand correctly he is one of
8 Ms. Herzog's partners at Hall Booth Smith who also represents
9 Coffee County in some manner?

10 **A.** Yes.

11 **Q.** And so you are again --

12 **A.** My understanding is --

13 **Q.** Oh, I'm sorry.

14 **A.** -- I think Tony is sort of the like --

15 **Q.** County --

16 **A.** -- like official, like appointed county attorney, and then
17 Jennifer works with him.

18 **Q.** Got it. Thank you.

19 And so you reached out to the two of them, and you wrote
20 here, I have talked to Jennifer a couple of times, but wanted
21 to touch base with you too.

22 So you are directing your email to Mr. Rowell; right?

23 **A.** Yes.

24 **Q.** And in the third sentence you write, we would like to come
25 down there and conduct some interviews to see if we can get a

1 handle on what happened, if anything.

2 Do you see that?

3 **A.** Yes.

4 **Q.** And so as of July 20, 2022, the Secretary's office and the
5 SEB had not yet conducted any interviews of anyone in Coffee
6 County other than what we had seen in May of 2021 that
7 Investigator Blanchard had done; right?

8 **A.** Correct. When we learned of the -- the phone call that
9 came out between Ms. Marks and Scott Hall, again, my -- my
10 thought on that was, I would like to do some forensic research
11 first before we do interviews, which I think, normally, our
12 investigators do interviews pretty quick.

13 In that case, I was concerned that people we would be
14 interviewing given history, for instance, with Mr. Hall and the
15 issues we had with Misty Hampton following 20 -- the 2020
16 election, I was concerned that we wouldn't get accurate
17 information, so I wanted some kind of forensic evidence prior
18 to that.

19 MR. BEDARD: David, sorry to interrupt. Just to
20 process things, has this been admitted into evidence? Did you
21 move to admit it?

22 MR. CROSS: I was just about to do that.

23 MR. BEDARD: Thank you.

24 MR. CROSS: So we move Exhibit 586.

25 MR. BEDARD: And again, just the pretrial order thing

1 depending on how it is used; otherwise, no objection.

2 THE COURT: Okay. It is admitted. I don't know what
3 is going on with the pretrial. We'll sort that out later.

4 MR. CROSS: Thank you, Your Honor.

5 BY MR. CROSS:

6 Q. The phone call that you referenced involving Scott Hall,
7 do you recall that that was played during a deposition of
8 Mr. Sterling in February of 2022? Is that the call that you
9 were referencing?

10 A. I believe the clip was played then, and I think we got the
11 full call from the plaintiffs in this case sometime thereafter.

12 Q. Okay. So your memory is that the Coalition plaintiffs
13 provided the full recording of the call sometime after his
14 deposition in the February, March --

15 A. I think it was March.

16 Q. Of '22?

17 A. Yes, sir.

18 Q. And so then July 20 of 2022 is when you reached out to set
19 up interviews with folks in Coffee County; is that fair?

20 A. At that point, again, as you went through earlier, we had
21 had some difficulties trying to -- getting that forensic
22 evidence that I was hoping to get was proving more difficult
23 than it first seemed like it would be. And I think at this
24 point, we did have some of that evidence.

25 Q. And at some point -- well, let me take a step back.

1 Judge William Duffey became the chairman of the SEB at one
2 point; right?

3 **A.** Yes.

4 **Q.** And he was, in fact, the chairman of the SEB in 2022 while
5 the State was beginning to investigate what happened with the
6 breaches in Coffee County; right?

7 **A.** I can't recall when he became chair, but --

8 **Q.** Do you recall having conversations with Judge Duffey about
9 the investigation into Coffee County; right?

10 **A.** Yes.

11 **Q.** And he raised a concern that there was evidence -- that
12 this is evidence of a serious matter that requires criminal
13 investigation including further forensic examination.

14 Do you recall him expressing that concern?

15 **A.** I don't recall specifically, but I recall that general
16 sense, yes.

17 **Q.** And it was Judge Duffey's decision to ask for help from
18 the GBI; right?

19 **A.** I don't think that is right.

20 **Q.** Whose decision -- or was that the Secretary of State's
21 office's decision?

22 **A.** Yes. I think we reached out to the GBI independently.

23 **Q.** Got it. That's right. I'm sorry. I got that backwards.

24 It was Judge Duffey reached out to the FBI for help; is
25 that right?

1 **A.** I think that's right.

2 **Q.** So if you --

3 MR. CROSS: Tony, don't pull this up.

4 BY MR. CROSS:

5 **Q.** Flip to Tab 24. I'm not going to put this on the screen.

6 Do you see there is a declaration from William S. Duffey,
7 Jr.?

8 **A.** Yes.

9 **Q.** And if you look at the signature on the fifth page, you
10 see this was signed by Judge Duffey as the chair of the State
11 Election Board?

12 **A.** Yes.

13 **Q.** And if you come down to Paragraph 12 on Page 4, if you
14 read the last sentence beginning, on Thursday.

15 Do you see that?

16 **A.** Yes, I see that.

17 **Q.** Does that refresh your recollection that on August 4th of
18 2022, Judge Duffey, as the chair of the SEB, asked the FBI to
19 look into this?

20 MR. BEDARD: Objection, Your Honor. I think it calls
21 for speculation. I don't think you can refresh somebody's
22 recollection with somebody else's declaration about
23 something --

24 MR. CROSS: You can refresh your recollection with
25 literally anything. A ham sandwich as the saying goes.

1 MR. BEDARD: Let me rephrase, Your Honor. He hasn't
2 set the foundation of whether he's aware of this declaration,
3 whether he's seen it, whether he has had this conversation,
4 Judge.

5 THE COURT: All right. You are going very fast, and
6 I need to go back and see what was asked again. Okay? All
7 right.

8 MR. CROSS: And that is not how a refreshed
9 recollection works.

10 THE COURT: All right. Well, just roll back. It
11 will be --

12 MR. CROSS: Sure.

13 THE COURT: -- faster because I was trying to deal
14 with another question you-all raised. And I'm sorry. I have
15 missed a beat.

16 We were on --

17 MR. CROSS: Yes, Your Honor --

18 THE COURT: -- Tab 23?

19 MR. CROSS: Tab 24.

20 THE COURT: 24. Excuse me.

21 MR. CROSS: And I wasn't putting this up, so it is
22 not on the screen. It is a declaration from Judge Duffey, and
23 I was just using it to refresh his recollection because he said
24 he believed that Judge Duffey reached out to the FBI, and I
25 wanted to confirm that as a fact.

1 And so I had him read the last sentence of
2 Paragraph 12 on the bottom of Page 4 and then asked him whether
3 that refreshes his recollection, that on August 4th of 2022,
4 Judge Duffey asked the FBI to look into this matter, meaning
5 the Coffee County breach.

6 THE COURT: I think it is a proper question. Either
7 it does or does not refresh his recollection. You have given
8 him some documentation that he can react to which includes an
9 affidavit of the former chair of the State Election Board dated
10 August 15, 2022.

11 THE WITNESS: So I recall discussions with
12 Judge Duffey about this matter and -- yes, so I recall after
13 the Secretary of State's office reached out to GBI for
14 assistance on the investigation, I think Judge Duffey also
15 wanted to reach out to FBI.

16 And I recall that -- the best of my recollection is
17 that he was going to reach out to some people that he knew
18 there. I don't think I was aware of the specific kind of
19 conversation that he mentioned in his declaration, but I knew
20 that was something he was planning on doing.

21 BY MR. CROSS:

22 **Q.** Okay. So fair to say that at the point at which
23 Judge Duffey learned about the breaches in Coffee County or the
24 potential for breaches in Coffee County at this time, he
25 thought it was very serious; right? You discussed that with

1 him?

2 **A.** By the time we were having discussions with Judge Duffey,
3 I think everyone realized it was very serious. And that would
4 have been, I think, in the summer of 2002 time frame -- 2022, I
5 should say.

6 **Q.** Right. The years get hard. I'm with you.

7 MR. CROSS: Tony, can you pull up Exhibit 134?

8 BY MR. CROSS:

9 **Q.** And go to Tab 25 if you'd like, Mr. Germany.

10 Let me just ask you if you recognize Exhibit 134.

11 **A.** Yes.

12 **Q.** And this is the official letter from the Secretary's
13 office to the GBI asking them to investigate suspected
14 unauthorized access and whether that took place following the
15 January 2021 runoff elections and the possibly accessed
16 system -- indicates the possibly accessed system has not been
17 used in elections since that time.

18 Do you see that in the second paragraph?

19 **A.** Yes, I see that.

20 **Q.** So this is a formal request from the Secretary's office
21 for the GBI to investigate this; is that fair?

22 **A.** In this, the subject is request for assistance in
23 investigation, and the next paragraph asks that they assist the
24 Secretary of State's office, which is something that the GBI
25 will work with other law enforcement agencies in the State to

1 assist in investigations. And that is what this was
2 requesting.

3 **Q.** And I was going to ask about that.

4 The language assist, does that mean that the GBI
5 investigates alongside with investigators in the Secretary's
6 office that there are folks that are working together or what
7 does that mean?

8 **A.** Well, it always becomes kind of an issue in terms of
9 assistance, or is someone just kind of doing their own
10 independent thing, and I would say there is kind of elements of
11 both, and then it sort of -- it is factually dependent on what
12 happens.

13 **Q.** And the GBI did open an investigation immediately after
14 receiving this letter; is that fair?

15 **A.** I don't know that I can say immediately, but yeah, my --
16 yes.

17 **Q.** Within -- they opened an investigation sometime in the
18 month of August of 2022?

19 **A.** I know we were having discussions with GBI, and I think
20 they were going to go down with our office and our
21 investigators to Coffee County to conduct some interviews, and
22 then that sort of got derailed when the Coffee County people
23 decided they did not want to sit for interviews voluntarily. I
24 think that was in August of 2022.

25 **Q.** The GBI released a report on that investigation in the

1 latter half of last year.

2 Do you recall that?

3 THE COURT: In '23?

4 MR. CROSS: I'm sorry. Yes. Yes. Last year, '23.
5 Thank you.

6 THE WITNESS: I'm not sure when they released it.

7 BY MR. CROSS:

8 **Q.** Okay. That's fair. Let me ask a better question.

9 Can you provide a rough time frame for when the
10 Secretary's office, to your knowledge, first received either a
11 draft or a final report from the GBI?

12 **A.** So we did not receive anything from the Secretary of
13 State's office. What happened, as I was kind of alluding to
14 is, GBI, once we got them involved, they sort of took off and
15 basically conducted their own investigation, which happens.
16 And we were not really privy to that.

17 And then SOS office did not receive a copy of that
18 investigation until -- I believe it was released publicly as
19 part of the Trump indictments in Fulton County, and we received
20 it at that point, which -- and that happened subsequent to when
21 I was at SOS. It happened -- it was in the news when it
22 happened. Maybe --

23 **Q.** Oh, right. Because you left the Secretary's office in
24 January of '23?

25 **A.** Correct.

1 Q. So you were gone at the time that the report came out,
2 whenever it came out?

3 A. I was --

4 Q. I'll ask a better question.

5 The Secretary's office did not receive a final report
6 while you were there, to your knowledge?

7 A. Correct.

8 Q. Okay.

9 A. And then based on subsequent conversations just with my --
10 with my successor, I think they were trying to get that when it
11 became public as part of those Trump indictments.

12 Q. Right. While you were there and the GBI was assisting the
13 Secretary of State in this investigation, was there any level
14 of communication, to your knowledge, between the Secretary's
15 office and the GBI? Any reports or updates on the
16 investigation that were received or discussed?

17 A. Usually what happens in things like that is our office
18 will -- or I have heard this kind of with other law enforcement
19 also -- will reach out and ask for, hey, what is going on?

20 And we don't really get -- we might get kind of a pretty
21 succinct update without a lot of substance. So my recollection
22 is that we might have got some of those along the way.

23 Q. And what do you recall were the updates along the way?

24 A. I mean, nothing of real substance.

25 Q. Was there anything specifically you can recall about those

1 updates?

2 **A.** I do recall at one point I think they went to Misty
3 Hampton's house, and basically, I recall learning they really
4 didn't --

5 THE COURT: I'm sorry?

6 THE WITNESS: I recall they went to Misty Hampton's
7 house, and I think she wouldn't talk to them or something like
8 that, without kind of further process.

9 MR. CROSS: If you could grab Exhibit 148.

10 BY MR. CROSS:

11 **Q.** So if you take a look at Tab 28, Mr. Germany, tell me if
12 you recognize Exhibit 148 as something you've seen before.

13 **A.** I don't know that I have seen this before.

14 **Q.** You can put that aside.

15 MR. CROSS: You can pull that down.

16 BY MR. CROSS:

17 **Q.** When the -- I'm sorry. I can't remember if I asked you
18 this yesterday.

19 When the events of May of 2021 unfolded, the Cyber Ninjas
20 card coming in, for example, replacing the EMS server, hiring
21 Mr. Persinger, did any of those events rise to the level that
22 you felt the need to alert Secretary Raffensperger?

23 **A.** Not to my recollection.

24 **Q.** When you were the general counsel, how would you decide
25 whether an issue of a potential threat to the voting system

1 rose to the level that you want to alert the Secretary himself?

2 **A.** Well, any threat to the election system, I would alert him
3 to immediately. I think the issue was all of those things you
4 mentioned were kind of coming in different pieces, and I had
5 not at least put them together as of this day a threat to the
6 election system.

7 MR. CROSS: Let's go to Exhibit 282. It is Tab 32.

8 THE WITNESS: I should say once we got kind of that
9 final piece of that phone call.

10 THE COURT: Which phone call?

11 THE WITNESS: The phone call between Ms. Marks and
12 Scott Hall. Then I probably would have alerted him, but I
13 can't recall specifically.

14 BY MR. CROSS:

15 **Q.** And I was going to ask you that.

16 As you sit here, is there any time frame you can offer the
17 Court on when, to your knowledge, you or anyone else alerted
18 Secretary Raffensperger that there was a potential breach that
19 occurred in Coffee County in January of 2021?

20 **A.** I mean, we talk on a daily basis, so I can't say one way
21 or the other.

22 **Q.** Is there -- so the Hall then call that you referred to,
23 you had the full thing in March of 2022.

24 Is there any time frame you can offer on how quickly
25 someone alerted the Secretary to that, to your knowledge?

1 **A.** Well, what I'm trying to say is, I talk to Secretary
2 Raffensperger probably every day, and so something very well
3 could have come up regarding Coffee County much prior to that.

4 Again, I don't think I would have worded to him -- in my
5 mind, this wasn't like this is a threat to the election system.
6 You know, frankly, we were dealing with, you know, threats or
7 something that happened every day; right? So you -- and then
8 you have to basically triage those, and then there is all sorts
9 of different systems you are dealing with and then all sorts of
10 different types of threats.

11 And so he would -- I just can't recall because he is
12 generally aware of what is going on just based on the fact
13 that, you know, we're talking probably on a daily basis.

14 But in terms of raising it to the level of, Mr. Secretary,
15 this is a major -- potentially major problem, I wouldn't have
16 done that because that wasn't my understanding really until
17 subsequent to the release of the phone call between Ms. Marks
18 and Scott Hall.

19 **Q.** And how long after you guys received that phone call did
20 it -- did it strike you as potentially a major problem at the
21 level that you would want to alert the Secretary himself?

22 **A.** I really can't say. I would hope pretty quickly, but I
23 just can't recall that.

24 **Q.** All right. Let's take a look at Exhibit 282.

25 You see here there's an email at the top of the thread

1 here that you received from Kevin Rayburn.

2 You are copied on it on April 5th of 2019?

3 **A.** Yes.

4 **Q.** And if you come down to the bottom, the email begins with
5 an email from someone and an email address bretsolid@gmail.com
6 on the same day?

7 **A.** Yes.

8 **Q.** It goes to soscontact@sos.ga.gov.

9 Do you see that?

10 **A.** Yes.

11 **Q.** And is that sort of, in general, a publicly accessible
12 email inbox for the Secretary's office?

13 **A.** Yes.

14 **Q.** And the subject line reads, I bet I can hack your
15 electronic voting machines.

16 Do you see that?

17 **A.** Yes.

18 **Q.** And Mr. Hadley writes -- or whoever this person was -- if
19 you don't want me to try and hack your election, please follow
20 Oregon's lead and vote by mail on paper. You really don't --
21 don't is in all caps -- need electronic voting machines. But
22 if you insist, then let the games begin. Fair warning.

23 Do you see that?

24 **A.** Yes.

25 **Q.** Here, Mr. Rayburn is alerting you and others, including

1 Mr. Beaver, to this and says, we need to report this to
2 DHS/MS-ISAC.

3 Do you see that?

4 **A.** Yes.

5 **Q.** And do you know what he is referring to there?

6 THE COURT: I'm sorry. Who? We need to report.

7 Who is that from?

8 MR. CROSS: So Kevin Rayburn at the top.

9 THE COURT: Okay. And he is with?

10 BY MR. CROSS:

11 **Q.** Kevin Rayburn, what was his role at the Secretary's
12 office?

13 **A.** Kevin Rayburn at the time was our deputy general counsel
14 and deputy elections director. Unfortunately, we lost him -- I
15 shouldn't say it like that. He left the office. He is doing
16 very well.

17 **Q.** He's alive and well.

18 **A.** I still talk to him. He went to be general counsel for
19 the Election Assistance Commission. It definitely was a loss
20 for SOS, though.

21 But no, he is doing great. Sorry.

22 **Q.** He is alive and well?

23 **A.** Alive and well.

24 **Q.** Okay.

25 **A.** I'm going to call him after this. I haven't talked to him

1 in a few weeks, but --

2 **Q.** And the DHS, obviously, that is Department of Homeland
3 Security?

4 **A.** Yes.

5 **Q.** And the MS-ISAC, do you know what that refers to?

6 **A.** So that refers, I believe, to -- it stands for multistate
7 ISAC, which is -- I'm going to probably mess it up. It comes
8 by like information security something, and it is kind of a
9 government -- I believe they are part of DHS, but it is -- it
10 exists to forward this type of thing to.

11 **Q.** And Mr. Rayburn, who reported to you at the time, was
12 indicating this was a serious enough issue that you should
13 alert DHS to it; right?

14 **A.** Yes.

15 **Q.** And do you know whether this was raised with Secretary
16 Raffensperger?

17 **A.** I don't know.

18 **Q.** I mean, looking at it now, does this strike you as the
19 kind of thing that, in your words, would suggest a potentially
20 major problem that you would want to alert Secretary
21 Raffensperger?

22 **A.** No. This strikes me as someone who is firing off an
23 email, and then to the extent someone can do -- you know,
24 someone probably kind of in the more technical DHS/MS-ISAC, if
25 they can do analysis of that email to determine who that person

1 is -- which, like you said, based on the email, you don't
2 really know who that is. But maybe it is someone they could
3 find. Maybe it is someone that they are aware of.

4 So that didn't strike me as like an imminent threat to
5 Georgia elections, but really more so as somebody that we would
6 want DHS -- and MS-ISAC, I think, really exists as kind of an
7 information-sharing group.

8 And so you kind of want to share that information so that
9 if he is -- if this guy, whoever he is, which we don't even
10 know, is someone other people are aware of just to kind of
11 put -- you know, make sure that that is -- make sure that we
12 kind of are contributing that to the general -- they are more
13 on, like, the intelligence-gathering side. So I think that was
14 the purpose of that.

15 **Q.** Let's go to Tab 33, if you would, please.

16 MR. BEDARD: Again, I apologize to interrupt, but did
17 we move 282 and 134 into evidence?

18 MR. CROSS: Yes. Sorry.

19 MR. BEDARD: That's okay.

20 MR. CROSS: I appreciate the reminders, Mr. Bedard.
21 I'm trying to move quickly.

22 MR. BEDARD: Yes. Since they are all stickered, I
23 know it is easy to think that they are already in.

24 THE COURT: All right. No objections?

25 MR. BEDARD: No, Your Honor.

1 THE COURT: All right. They are admitted.

2 BY MR. CROSS:

3 Q. So take a look at Tab 33, if you would. This is
4 Exhibit 586 -- 587.

5 And if you come down to the -- if you look at the second
6 page, you'll see that it starts out with the same email we had
7 just seen. We were just talking about this individual
8 identifies as Bret Hadley.

9 Do you see that?

10 A. Yes.

11 Q. And then when we get to the bottom of the first page, we
12 see the email from Mr. Rayburn saying, we need to raise this
13 with DHS, that we just looked at.

14 Do you see that?

15 A. Yes.

16 Q. And then within about two hours, you respond the same day.

17 Do you see that?

18 A. Yes.

19 Q. And you tell Mr. Rayburn, please alert Secretary, Jordan,
20 and Gabe; right?

21 A. Yes.

22 Q. Secretary is Secretary Raffensperger?

23 A. Yes.

24 Q. Jordan is Jordan Fuchs?

25 A. Yes.

1 **Q.** Gabe is Gabe Sterling?

2 **A.** Yes.

3 **Q.** Do you have any reason to believe that Mr. Rayburn did not
4 alert the Secretary, Ms. Fuchs, and Mr. Sterling of this email?

5 **A.** No. In fact, it looks like he did it just a few minutes
6 later.

7 **Q.** Right. Just a few minutes later.

8 Now, if we come up to the top, there is a response from
9 Mr. Sterling who writes in the second sentence, he is a random
10 guy from Seattle.

11 Do you see that?

12 **A.** Yes.

13 **Q.** Do you have any knowledge as the general counsel involved
14 in these issues as to how Mr. Sterling learned this person was
15 from Seattle?

16 **A.** I don't know.

17 **Q.** Do you recall an investigation being done into this
18 person?

19 **A.** No.

20 **Q.** But fair to say some kind of investigation was done that
21 led Mr. Sterling to believe that they knew where this guy was
22 located?

23 **A.** I think from our standpoint, from an investigatory
24 standpoint, we would have forwarded that to DHS and MS-ISAC as
25 something that was really more in their purview. I don't know

1 how Gabe -- he might have Googled the guy's name. I have no
2 idea.

3 **Q.** Right.

4 MR. CROSS: And we'll move Exhibit 587 in, Your
5 Honor.

6 MR. BEDARD: You said this was 587?

7 MR. CROSS: Yes.

8 MR. BEDARD: I had it noted as 586.

9 No objection beyond the pretrial order issue, which
10 we'll discuss during the break, and I think we can address it.

11 THE COURT: Well, it is admitted subject to anything
12 that gets arisen -- gets flagged in connection with that
13 discussion.

14 MR. BEDARD: Thank you, Your Honor.

15 BY MR. CROSS:

16 **Q.** So switching topics a little bit for you, Mr. Germany.
17 Flip to Tab 7, if you would, please.

18 And you'll see here there is a document titled State
19 Defendants' Notice of Filing Fortalice Contract.

20 Do you see that?

21 **A.** Yes.

22 **Q.** And you can see at the top it was filed on September 1st
23 of 2020.

24 Do you see that?

25 **A.** Yes.

1 Q. And if you come down to the bottom of the first page, it
2 indicates, State defendants provide additional information.

3 It states that Fortalice serves a variety of cybersecurity
4 functions within the Secretary's office.

5 Do you see that?

6 A. Yes.

7 Q. Do you disagree with that?

8 A. No.

9 Q. Based on the time you were there, is that an accurate
10 statement?

11 A. Based on this time, yes.

12 Q. And has that changed -- that changed at some point while
13 you were there?

14 A. I don't know if Fortalice, like, kind of toward the end of
15 my tenure was still doing work for Secretary of State or not.
16 At this point, they were.

17 Q. Do you have any reason to believe that Fortalice stopped
18 doing work for the Secretary's office at some point after this?

19 A. Yes, just given that I didn't really hear about them. We
20 might have had other vendors kind of replace them.

21 Q. Do you have a rough time frame on when you stopped hearing
22 about them?

23 A. No. Sorry.

24 Q. All right. Flip to --

25 MR. CROSS: I'm not offering -- I'm not offering

1 Tab 7.

2 THE COURT: All right.

3 BY MR. CROSS:

4 Q. So flip to Tab 8, if you would, please.

5 MR. BEDARD: David, you did not move that in?

6 MR. CROSS: I did not.

7 THE WITNESS: Would it be okay if I took like a
8 two-minute bathroom break?

9 THE COURT: Sure.

10 MR. CROSS: Sure. Oh, yes, please. Sorry.

11 THE COURT: Anyone else who needs to as well, but let
12 the witness go first.

13 Go ahead.

14 Well, I'm never one to give up a bathroom break.
15 Let's take a few minutes.

16 **(A brief break was taken at 11:33 AM.)**

17 THE COURT: Have a seat. Let's proceed.

18 MR. CROSS: Thank you, Your Honor.

19 BY MR. CROSS:

20 Q. Do you need more water, Mr. Germany, or anything?

21 A. I'm good. Thank you.

22 Q. Let's flip to Tab 8, if you would, please.

23 A. Yes.

24 Q. And you'll see its cover is Exhibit A, and if you look at
25 the top, you'll see this is a document filed with the Court on

1 September 1st of 2020.

2 Do you see that?

3 **A.** Yes.

4 **Q.** And take a moment to flip through it. But if you look at
5 the first page of -- this is going to be Exhibit 588 -- do you
6 see at the top it refers to Georgia Secretary of State as the
7 State entity. The contractor is Fortalice Solutions. It
8 indicates the contract runs from May 21 of 2018, to May 20 of
9 2023.

10 **A.** I see that.

11 **Q.** And again, this was filed with the Court as the official
12 contract between the Secretary's office and Fortalice.

13 Do you have any reason to believe this is not that
14 contract?

15 **A.** No.

16 **Q.** Do you recall in the -- in 2019, the Secretary's office
17 engaged Fortalice to do a security assessment of the BMDs --
18 the Dominion BMDs that it was just beginning to roll out into
19 the State?

20 **A.** Yes.

21 **Q.** And what was your involvement, just at a high general
22 level, with respect to that assessment?

23 **A.** I do not recall being very involved.

24 **Q.** And who was involved with that, to your knowledge?

25 **A.** I'm not sure. I think that Michael Barnes would have been

1 involved because Center for Election Systems would be
2 overseeing the -- they would have kind of the equipment,
3 basically, that we would have and then be delivering to
4 counties.

5 So I would be speculating in addition to that.

6 **Q.** But your understanding is Mr. Barnes would have been sort
7 of overseeing this project because he had --

8 **A.** I don't know if I could say overseeing.

9 **Q.** Okay. Assisting?

10 **A.** Yes. I would have thought he was -- I think he would have
11 been involved.

12 **Q.** Do you have a recollection of who was sort of overseeing
13 or organizing the project?

14 **A.** I don't.

15 **Q.** Do you recall what the purpose of the project was?

16 **A.** I mean, I think it was basically what you said, to do a
17 security assessment of the BMDs.

18 **Q.** All right. Take a look at Tab 9, if you would, please.

19 MR. BEDARD: David, are you moving that into
20 evidence?

21 MR. CROSS: The contract?

22 MR. BEDARD: Yes.

23 MR. CROSS: Yes. I mean, it is already filed with
24 the Court, but we'll move it in as Exhibit 588.

25 MR. BEDARD: Just the PTO objection, but otherwise no

1 objection.

2 THE COURT: It is admitted subject to y'all working
3 that out.

4 BY MR. CROSS:

5 Q. Take a look at Tab 9, if you would, sir. Again, you can
6 see at the top this was filed with the Court on September 1st
7 of 2020.

8 Do you see that?

9 A. Yes.

10 Q. And here there is an email from Mike Holland at Fortalice
11 Solutions to Merritt Beaver, Clark Rainer, Paul Brandau,
12 September 17, 2019.

13 Do you see that?

14 A. Yes.

15 Q. And does this refresh your recollection that Mr. Beaver
16 was helping to organize this?

17 A. That makes sense.

18 Q. Given he's the CIO and this was a security assessment?

19 A. Well, no. Because, you know, Merritt's role as CIO is
20 really more dealing with internal networks and that type of
21 security. This is a little bit different. But Merritt would
22 have worked with Fortalice on their work on our internal
23 networks and the kind of traditional things that a CIO does.

24 So my guess is he was just basically the contact they
25 already had at SOS.

1 Q. And so you can see here Mr. Holland at Fortalice writes to
2 Mr. Beaver, let me know if the timing in October 7 to 8 will
3 work. We're pulling Matt Shirley from another project to make
4 sure SOS GA gets our best device hacker.

5 Do you see that?

6 A. Yes.

7 Q. And so this project -- this security assessment was
8 specifically to have Fortalice come in and see if they could
9 hack the BMD; right? Like a white hat hacker-type project?

10 A. I don't know if I could agree with that characterization.

11 Q. Well, do you have any understanding of why Fortalice was
12 bringing in their best device hacker for the security
13 assessment of the BMD in October of 2019?

14 A. Well, I think that would be a component of what they were
15 doing.

16 Q. I see. Okay. Got it. Thank you.

17 MR. CROSS: We will move Exhibit 589.

18 MR. BEDARD: And I object on just two grounds; one,
19 the PTO issue we mentioned. But beyond that, I think just to
20 relevance, because I don't think the document clarifies what
21 device it is referring to, whether it is DRE or BMD. The
22 timing gives me some question about whether it is which one.

23 So -- and I don't think the witness testified to
24 that, so that would be my objection to the exhibit.

25 MR. CROSS: He already testified this was an

1 assessment of the BMD.

2 THE COURT: He did.

3 MR. BEDARD: Well, just again for the record, I'm not
4 sure that that is reflected in the realtime. I could have
5 missed something, David, but --

6 THE COURT: Well, I'm looking at the dates. In 2019,
7 I had already issued my order of already having signed the
8 contract on the BMDs, and you were rolling it -- and doing an
9 initial -- the State was doing an initial testing, and there
10 was testimony regarding basically your proceeding with the
11 kickoff and --

12 MR. CROSS: I can go back and lay some additional
13 foundation if it is helpful.

14 THE COURT: That's fine. But I mean, I'm just saying
15 what is in the record at this juncture in terms of the
16 schedule. It is subject to clarification. And if he is wrong,
17 that is fine.

18 MR. BEDARD: That is fine. I withdraw if we get that
19 clarification, Your Honor. That's fine.

20 BY MR. CROSS:

21 **Q.** Flip back just for a moment to Tab 7, if you would, sir,
22 the State Defendants' Notice of Filing Fortalice Contract.

23 Do you see that?

24 **A.** Yes.

25 **Q.** And flip to the second page, if you would, please. And

1 you see this was signed by Bryan Tyson on the third page.

2 Do you see his electronic signature?

3 **A.** Yes.

4 **Q.** If you look at the second page, there are two paragraphs
5 there. Number 3 explaining there is not a separate contract
6 covering Fortalice's review of the BMDs, implying it is being
7 done under that normal contract we just saw.

8 And, Number 4, the scope of the BMD review project was set
9 out in emails that contained work product protected
10 information.

11 Do you see that?

12 **A.** Yes.

13 **Q.** And that is -- we saw a redaction in that one email we
14 looked at.

15 Do you see that?

16 **A.** I'll take your word for it.

17 **Q.** In Tab -- I think it is Tab -- I'm sorry.

18 Exhibit 589, do you see there were some lines that were
19 redacted?

20 **A.** In which tab?

21 **Q.** Exhibit 589, Tab 9.

22 THE COURT: The page that starts with, from my
23 column?

24 THE WITNESS: Yes, I see some redactions.

25

1 BY MR. CROSS:

2 Q. And so we're clear, this was a review -- this was a
3 security assessment of the BMD; right?

4 A. Yes.

5 MR. BEDARD: Just backing up real quick, now that
6 we've read a lot of declaration -- or that notice, I think,
7 into the record, I think we should just move that into the
8 record.

9 MR. CROSS: I'm happy to offer that. That will be
10 Exhibit 591. That is Tab 8 -- Tab 7. Tab 7 is 591.

11 THE COURT: Okay.

12 MR. BEDARD: It is Tab 8, David.

13 MR. CROSS: Tab 7 would be 591.

14 THE COURT: 590 or 591?

15 MR. CROSS: 591.

16 THE COURT: Okay. Fine.

17 BY MR. CROSS:

18 Q. So go to Tab 10, if you would, please, and that will be
19 Exhibit 590. Tab 10 will be 590.

20 If you look at the top of Tab -- or sorry, Exhibit 590, do
21 you see there is an email from Mr. Beaver to Mr. Holland at
22 Fortalice Solutions, and this is on October 24 of 2019?

23 A. Yes, I see that.

24 Q. And if you come to the bottom of the second page, you'll
25 see there is an email from Mr. Holland at Fortalice Solutions

1 to Merritt Beaver and Mr. Rainer on September 12th of 2019,
2 subject title voting machine project?

3 **A.** Yes.

4 **Q.** And Clark Rainer, did he work with Mr. Beaver in his
5 organization?

6 **A.** Clark was our deputy CIO at SOS.

7 **Q.** And then if you go on and take a look at the email, you
8 will see that Mr. Holland lays out what was being proposed for
9 this project, the number of bullet points on the third page of
10 Exhibit 590.

11 Do you see that?

12 **A.** I see that.

13 **Q.** In the second bullet, you write -- Mr. Holland writes here
14 in describing the scope of project, in a separate meeting in
15 advance of our team being on-site, conduct a product review
16 call regarding the voting machines.

17 Do you see that?

18 **A.** It looks like this is just stuff that was redacted out of
19 the previous email, so I'm not sure if that is important to
20 anybody.

21 THE COURT: In any event, at this juncture, it is
22 four years later.

23 Is this the proposal?

24 THE WITNESS: It wasn't something I was --

25 THE COURT: Involved with?

1 THE WITNESS: I never got these emails.

2 BY MR. CROSS:

3 Q. And the last question on Exhibit 590, Mr. Beaver writes,
4 can we get this planning to look at the voting equipment? Gabe
5 has asked for a specific look at the iPad-based pollbooks.

6 Do you see that?

7 A. Yes.

8 Q. And again, maybe you don't know the answer because you
9 weren't involved, but do you have any knowledge on why
10 Mr. Sterling wanted Fortalice as part of this BMD assessment to
11 also assess the Poll Pad?

12 A. I think he just wanted to make sure it was a comprehensive
13 review. But I guess I probably should -- that is speculation,
14 really.

15 Q. Short answer is, you don't know for sure?

16 A. Correct.

17 Q. Okay.

18 MR. BEDARD: Are we moving that in, David?

19 MR. CROSS: Yes. So Exhibit 590 is offered.

20 MR. BEDARD: PTO objection, but otherwise --

21 THE COURT: All right. Subject to the PTO being
22 resolved on this, it is admitted.

23 MR. CROSS: All right. Let's jump to Exhibit 47,
24 which is Tab 1 in the binder.

25 MR. BEDARD: 1?

1 MR. CROSS: Yes.

2 BY MR. CROSS:

3 Q. You can take a moment to flip through it if you need, but
4 just tell me if you recognize this as a copy of the Master
5 Solution Purchase and Service Agreement between Dominion and
6 the Secretary of State's office for the BMD system.

7 A. Yes.

8 Q. Okay. So this is the contract we talked about earlier
9 that you had some involvement negotiating and some input into
10 the terms; is that fair?

11 A. Yes.

12 Q. As you sit here, as the former general counsel, you're not
13 aware of any communication from the Secretary's office to
14 Dominion reporting any kind of breach incident with respect to
15 Coffee County -- the breaches that occurred in Coffee County;
16 is that right?

17 A. Correct.

18 Q. And you're not aware of Dominion making any breach
19 incident formal report to the Secretary's office involving
20 Coffee County; right?

21 A. Correct.

22 Q. Are you aware of any communication from the Secretary's
23 office to Dominion raising a concern about whether Dominion
24 breached its duties under the contract in light of the
25 vulnerabilities confirmed in the system by CISA?

1 **A.** Could you restate -- could you ask again.

2 **Q.** Sure.

3 **A.** Particularly the communications, from who to who?

4 **Q.** Yeah. Sorry. Let me ask again.

5 Are you aware of any communication from anyone in the
6 Secretary's office to Dominion that Dominion had failed to
7 comply with its contract duties because of some failing or
8 vulnerability or flaw in the Dominion voting equipment used in
9 the State?

10 **A.** Because of the CISA report?

11 **Q.** Any basis.

12 **A.** No.

13 **Q.** Have you yourself ever considered whether, in your role as
14 general counsel, Dominion may have breached any duty it owed
15 the State with respect to the security reliability or the
16 performance of the products that the State uses from Dominion
17 for the voting system?

18 MR. BEDARD: And I just object, Your Honor, to the
19 extent it calls for a legal conclusion, but also to relevance
20 of Mr. Germany's personal feelings as to whether there is --
21 Dominion satisfied its contractual duties.

22 MR. CROSS: I didn't ask for his personal feelings.
23 In his official role as general counsel representing the State,
24 having negotiated this contract.

25 MR. BEDARD: The same objection.

1 THE COURT: I think that he can say in his role as
2 general counsel.

3 THE WITNESS: I don't think that is something that
4 has occurred. That -- I'm not saying the analysis. I'm saying
5 your conclusion.

6 Just based on everything I know about the Dominion
7 system, about elections in Georgia, the reality is basically
8 the exact opposite of what you have said.

9 So no. I -- to the extent there has been analysis
10 done, I think it has been just based on all of the contrary
11 evidence to the functionality of the equipment.

12 BY MR. CROSS:

13 **Q.** So you anticipated my next question.

14 Your view, while you were the general counsel of the
15 Secretary of State, in light of everything you know about what
16 happened with Coffee County breaches, Dr. Halderman's report,
17 CISA, all of the knowledge you have about this system, your
18 view as general counsel was Dominion has fully complied with
19 its duties under the contract?

20 **A.** Well, I think about it much broader than the things you
21 mentioned. I think about, is it something that people are able
22 to go vote on, have their votes recorded, have their votes
23 counted accurately, have results reported quickly?

24 And every piece of evidence shows that that is exactly
25 what is happening and continues to happen. So given -- you

1 know, you have to take into account the entirety of what an
2 election system has to accomplish, and it is accomplishing
3 those things.

4 **Q.** And you believe it is accomplishing those things based on
5 past election results and outcomes, things like the hand
6 re-count in 2020?

7 **A.** That is a big one for sure. The idea that when we do a
8 full hand audit -- I prefer to call it an audit just because
9 re-count is kind of something else in law. But a full hand
10 audit of the equipment really proved to beyond, I think, a
11 shadow of a doubt -- although there's people that dispute it.
12 A lot of those people are indicted, but that --

13 **Q.** Indicted in part for the breaches in Coffee County?

14 **A.** Sure, yeah, among other things. But that full hand count
15 of ballots showed that the selections on the paper ballots, the
16 written out, you know --

17 THE COURT: For the presidential race?

18 THE WITNESS: For the presidential race, yes. That
19 that matched what was recorded -- tabulated and then reported
20 by the scanners, but then --

21 THE COURT: But that was the race that was audited;
22 right?

23 THE WITNESS: Yes.

24 THE COURT: But not others?

25 I'm not trying to argue about what happened in

1 others. I'm just trying to get clarity that that was the race
2 that was audited.

3 THE WITNESS: Yes. And that is generally, you know,
4 just based on what I know about how audits work. It is
5 generally -- across the country, it is generally of a single
6 race. And that is -- you know, that is the way these things
7 are done. But that is just one of the things. You know,
8 there's tons of other things that if there was an issue with
9 how -- people being able to cast their ballot accurately,
10 people being able to vote the way they want to, there would be
11 a lot of evidence of that.

12 For instance, when there is a problem, like there was
13 in DeKalb County in the primary of 2022 when the candidates on
14 the ballot-marking device didn't match up with the candidates
15 in the scanner, it is a very apparent issue, and it was able to
16 be resolved.

17 Frankly, it should have been caught by the county
18 earlier. But even when those things are missed, it is able to
19 be caught -- I mean, it was very apparent to everyone looking
20 at that election, and it was able -- but the election was still
21 able to be counted accurately because of the paper ballots with
22 the candidate's name written in text on the ballot.

23 And so yeah, I mean, everything I have seen shows
24 that that is exactly what these machines and this overall
25 system is doing.

1 And again, to the overall system, that includes, of
2 course, voters checking in to vote. And, you know, you see
3 that process working. And if that process wasn't working, you
4 would see a lot of other issues.

5 There's reports of, you know, people kind of -- we
6 received reports following 2020 of all these illegal ballots
7 being cast. If you look at the entirety of the system,
8 especially the Poll Pad part of it, it shows that that is not
9 happening either. Because, you know, votes line up with
10 voters. And if there's someone who is voting -- who is casting
11 a vote for someone and it is not that person, which are
12 allegations we received, you know, that -- there would be
13 evidence of that.

14 But instead, all of the evidence shows that people
15 are voting on this system. The results are counted accurately.
16 In addition to the presidential audit, a lot of counties have
17 done additional audits since the November 2020 election,
18 including full hand count audits. And all of those show this
19 is exactly what happens.

20 I recall a re-count in Chatham County where they did
21 an actual hand re-count and again matched up with the reported
22 results. So my analysis is based off of all of that.

23 THE COURT: Is this a good stopping point? Because I
24 was going to -- I said I would give you -- but if it is not,
25 I'll give you another few minutes.

1 MR. CROSS: I'm actually pretty close to done, so I
2 just thought we could wrap it up before lunch, if that works.

3 THE COURT: Well, how much time do you -- I have
4 something I have to be at from --

5 MR. CROSS: Oh, I'm sorry.

6 THE COURT: -- and I don't mind being five or
7 ten minutes late, but I have to -- but I don't have --

8 MR. CROSS: Why don't I finish this point.

9 Does that work? That will be quick.

10 THE COURT: That's fine.

11 BY MR. CROSS:

12 Q. Mr. Germany, did the -- you were the general counsel of
13 the Secretary's office when the GEMS DRE system was in place;
14 right?

15 A. From -- yeah, I mean, it was in place before I was general
16 counsel.

17 Q. Right.

18 A. But then while I was general counsel, it was in place
19 until we implemented the current system.

20 Q. Right. And as the general counsel, did you believe that
21 that system was secure and reliable in all the same ways that
22 you just said about the BMD system?

23 A. Yes. For all the same reasons.

24 Q. For all the same reasons.

25 So you believe that that -- all the aspects of that voting

1 system also were protected against any kind of intrusion, for
2 example?

3 **A.** Well, what I look to is, you know, are the votes that
4 people are voting -- is that being -- are they able to do that?
5 Is that being reported -- recorded accurately and then reported
6 accurately?

7 And then there -- as part of that is processes in place to
8 protect from intrusion. There is a lot of other parts of that
9 as well.

10 But the same thing, all the evidence there shows that that
11 is exactly what happened in that system too. And I'm talking
12 about in real elections.

13 **Q.** So you felt that the DRE system and the current BMD system
14 in your role as general counsel is secure and reliable and
15 robust against intrusions; is that right?

16 **A.** Certainly, yes.

17 **Q.** Obviously, Logan Lamb got access to an aspect of the GEMS
18 system; right? Twice?

19 **A.** I don't think I would agree with that.

20 **Q.** Okay. Numerous individuals spent day after day after day
21 in an elections office with direct access to the voting system
22 currently used in Coffee County; right?

23 **A.** They were given access, from my understanding, to the
24 equipment that was in Coffee County, yes, the voting equipment.

25 **Q.** Have you seen the photo of individuals at

1 SullivanStrickler sitting at the EMS computer terminal
2 themselves in that office? Have you seen that?

3 MR. BEDARD: Again, objection, Your Honor, just to
4 the extent it assumes facts that aren't in evidence yet.

5 BY MR. CROSS:

6 **Q.** Have you seen a photo that shows that?

7 **A.** I don't know. I have seen a lot of those photos.

8 THE COURT: And you have seen videos as well of that?

9 THE WITNESS: I have seen videos, yes, of people
10 walking in and out, mostly.

11 THE COURT: But with different timestamps?

12 THE WITNESS: Yes.

13 THE COURT: Yeah.

14 THE WITNESS: Although the videos I looked at, the
15 ones that really were -- became public, especially were the
16 ones that they were more focused on the who.

17 But yes, I think that is correct. It was different.
18 It was over a few days.

19 BY MR. CROSS:

20 **Q.** All right. Last thing before we break.

21 Presumably, you have used a variety of computer devices
22 over the years, laptops, smartphones, things like that?

23 **A.** Yes.

24 **Q.** Have any of those devices ever failed? Did they stop
25 working -- stop working the way you expected them to at some

1 point?

2 **A.** I'm sure that is the case.

3 **Q.** Yeah, it is common with computers; right? They stop
4 working? Sometimes they glitch; right?

5 **A.** Yes.

6 **Q.** The fact that an electronic device has worked over and
7 over and over again, maybe for years, doesn't tell us that it
8 is going to keep working like that every time in the future it
9 is used.

10 Can we agree on that, sir?

11 **A.** I can agree with that. I don't think that is kind of an
12 accurate statement of what happens in elections, but I would
13 agree with that, generally.

14 **Q.** Okay.

15 MR. CROSS: Nothing more right now, Your Honor.
16 We'll take a break, if that works for Your Honor.

17 THE COURT: Okay. All right.

18 So, Harry, what do you have as the time on your
19 computer?

20 12:06. Okay.

21 MR. CROSS: Then, Your Honor, I did forget two
22 exhibits, I think. Exhibits 47 and 589, I just want to move
23 those in before I forget to do it.

24 MR. BEDARD: David, 47 was the contract; right?

25 MR. CROSS: Correct.

1 MR. BEDARD: And what was 589? What tab was that?

2 COURTROOM DEPUTY CLERK: 589 was already moved in.

3 MR. CROSS: That's what I thought.

4 MR. BEDARD: There's nothing else other than 47?

5 MR. CROSS: Just the contract.

6 MR. BEDARD: No objection to that one, Your Honor.

7 THE COURT: All right. It is admitted.

8 MR. CROSS: Thank you, Your Honor.

9 THE COURT: Okay. So I'll see you-all at 12:40.

10 MR. BEDARD: Just for clarification, I think, David,
11 are you still planning on questioning him after the break?

12 MR. CROSS: Yeah. But it will be very brief, I
13 think.

14 MR. BEDARD: Thank you.

15 THE COURT: All right. Thank you.

16 **(A lunch break was taken.)**

17 THE COURT: Have a seat.

18 MR. CROSS: May I proceed, Your Honor?

19 THE COURT: Yes.

20 MR. CROSS: May I approach the witness?

21 THE COURT: Yes.

22 BY MR. CROSS:

23 **Q.** Mr. Germany, I'm almost done, and I very much appreciate
24 your patience.

25 Do you see Exhibit 137 in front of you?

1 **A.** Yes.

2 **Q.** And you'll see that this is an email that you sent to
3 Mr. Tyson, other lawyers representing State defendants in this
4 case, copying Gabriel Sterling and Steven Ellis on August 1st
5 of 2022.

6 Do you see that?

7 **A.** Yes.

8 **Q.** And Mr. Ellis, I believe at the time, reported to you in
9 your office?

10 **A.** Yes.

11 **Q.** Okay.

12 MR. CROSS: Your Honor, we would move Exhibit 137
13 into evidence.

14 MR. BEDARD: I don't think there is any objection,
15 Your Honor. I'm just flipping through it real quick.

16 No objection, Your Honor.

17 THE COURT: It is admitted.

18 BY MR. CROSS:

19 **Q.** Mr. Germany, do you recall that on September 26 of 2022,
20 Secretary Raffensperger did an interview with a local TV news
21 station?

22 **A.** No.

23 MR. CROSS: Let's pull up Exhibit 146, please.

24 BY MR. CROSS:

25 **Q.** So you have in front of you -- you see it is a news

1 article from September 26 of 2020, with the title Questions
2 Raised and Timeline of State Response to Coffee County Breach.

3 Do you see that?

4 **A.** Yes.

5 **Q.** This is obviously after you left -- no, I'm sorry.

6 You were still general counsel at this time; correct?

7 **A.** Correct.

8 **Q.** Yes. Thank you.

9 And so as you sit here, you -- well, let me ask it this
10 way.

11 Does seeing this article, seeing the Secretary here on the
12 screen with the video -- does that refresh your recollection
13 that he did an interview with a local news station where he
14 talked about an investigation into Coffee County breaches?

15 **A.** Yes.

16 **Q.** And if you look -- well, let me ask you this -- take a
17 step back.

18 Do you recall that he said in the video -- and we can play
19 it if we need to -- that his office and he was aware, in his
20 words, very early on -- very early on in 2021 about the Coffee
21 County breaches?

22 Do you recall that?

23 **A.** I don't recall that. I don't recall what he -- I mean, I
24 can read kind of the text on this exhibit, but I don't recall
25 what he said in the interview.

1 Q. Okay. We'll get to that in a second. I did not give Tony
2 a heads-up on it. I thought you might remember it. We'll come
3 to the video in moment, but take a look at the article, if you
4 would.

5 If you would look down at the bottom. Do you see where it
6 reads, last Thursday, 11Alive's Doug Richards interviewed
7 Secretary Raffensperger and asked him on camera when he first
8 learned about the breach. Raffensperger initially answered
9 January of 2021.

10 Do you see that?

11 A. Yes.

12 Q. Does that refresh your recollection that he said in this
13 interview that he learned about the breach in January of 2021?

14 A. That is what it says he said.

15 MR. BEDARD: And, David, just because we read it into
16 the record, if you want to move to admit that.

17 MR. CROSS: Yeah, I was going to. I was going to get
18 there. I just wanted to lay a little more foundation on it.

19 Tony, can you play this real quick?

20 **(Playing of the videotape.)**

21 BY MR. CROSS:

22 Q. Just yes or no, did you have any discussions as a general
23 counsel with Secretary Raffensperger about this at the time?

24 Just yes or no. I don't want to get into privileged
25 information.

1 And if you don't recall --

2 **A.** I can't recall, specifically.

3 **Q.** Okay.

4 **A.** I can say it is something we probably would have
5 discussed, but I can't recall specifically.

6 MR. BEDARD: David, just for clarification, when you
7 say, at this time, do you mean September of 2022?

8 MR. CROSS: Yes. Yeah, on or around the time of the
9 interview.

10 BY MR. CROSS:

11 **Q.** Do you recall, just yes or no, having any discussion with
12 Secretary Raffensperger regarding the statements he made in
13 this interview? Do you have a specific recollection of that
14 happening at any point?

15 **A.** I mean, my recollection surrounding this is when it came
16 out, it seemed pretty clear that Secretary Raffensperger was
17 confusing the initial post 2020, early 2021 --

18 **Q.** Sorry to interrupt. I don't want you to speculate on
19 Secretary Raffensperger, what he was doing.

20 He is welcome to come explain himself, but I don't want
21 you want to crawl into his head and tell us what you think.

22 MR. BEDARD: Your Honor, he was asking about his
23 awareness of the situation too, so I think he is entitled to
24 explain what his understanding was of the situation.

25 THE COURT: Well, you can have a -- you can ask the

1 question yourself. That is not the question Mr. -- that was
2 asked, so -- by plaintiffs' counsel.

3 BY MR. CROSS:

4 **Q.** My question was simply: Just yes or no, as you sit here,
5 do you specifically recall having a conversation with Secretary
6 Raffensperger about the statements he made in this interview?
7 Do you recall a conversation happening?

8 **A.** I don't specifically recall really any conversations I had
9 in September of 2022. I kind of have to infer from what -- you
10 know, just from sort of what I generally recall, really, based
11 on any topic going back that far.

12 **Q.** Okay. So you don't recall ever having a discussion with
13 Secretary Raffensperger about his interview?

14 **A.** I think I would have. But I don't specifically recall it.

15 **Q.** Okay.

16 **A.** Again, because I -- we have a lot of conversations.

17 **Q.** All right. If we can go back to Exhibit 146.

18 If you look at the bottom of Exhibit 146, picking up where
19 we left off where it was reported Raffensperger initially
20 answered January of 2021, but within minutes of answering, an
21 aide to Raffensperger corrected the Secretary of State's
22 response off camera and offered May of 2021 as the correct
23 date.

24 Do you see that?

25 **A.** Yes.

1 Q. And do you know -- do you have any reason to believe that
2 that is not accurate? That an aide did not say what is
3 reported here?

4 A. I have no idea.

5 Q. You don't know one way or the other?

6 A. Correct.

7 Q. It then goes on, 11Alive used that corrected information
8 in our on-air report, removed the full interview with
9 Raffensperger from YouTube which included the earlier initial
10 answer of January of 2021. However, a Friday -- on Friday, a
11 representative with the Secretary of State's office clarified
12 that the office did not know about or begin investigating
13 Coffee County until July of 2022.

14 Do you see that?

15 A. Yes.

16 Q. Okay. Do you know who the aide was that is identified
17 there?

18 A. No.

19 MR. BEDARD: Objection just, Your Honor, again to
20 hearsay as to actually what happened between the reporter and
21 those people for the truth of whatever is going on there. He
22 can ask the witnesses about their awareness of what happened
23 there. But taking that for the truth of the matter asserted I
24 do think is hearsay.

25 MR. CROSS: Well, the person we would like to ask is

1 refusing to appear, so the hearsay objection seems awfully
2 unfair.

3 MR. BEDARD: Your Honor, I think there are other
4 people who can also testify to that.

5 THE COURT: Well, subject to your linking it all up,
6 I -- you're just simply at -- were you aware, sir, that -- I
7 mean, this is still before you left July of '22; is that right?

8 THE WITNESS: September of '22, but before I left,
9 yes, ma'am.

10 THE COURT: Right. Were you personally aware that a
11 representative of the Secretary of State's office clarified to
12 the media that the office did not know about or begin
13 investigating Coffee County until 2022?

14 THE WITNESS: So my awareness of this incident, as
15 I -- I remember it coming up, and I think it was -- I think one
16 thing that was frustrating is I think the stated topics of the
17 interview were not what was actually asked about, so I think
18 that led to some confusion in responses.

19 And based on -- I mean, I know I talked to multiple
20 people after this to kind of just be like, hey, what happened?

21 I recall talking to Jordan Fuchs, for instance. And
22 based off of those, I think that Secretary Raffensperger -- I
23 think the January of 20 --

24 THE COURT: I'm not asking you to interpret what he
25 said.

1 I'm asking about: Were you aware that the office
2 itself -- that the Secretary of State's office clarified or
3 then later on indicated to the -- to the media conducting this
4 interview that he -- that the Secretary, in fact, did not know
5 about or begin investigating Coffee County until July of '22?
6 I mean, isn't that what you were trying to find out? Yeah.

7 THE WITNESS: I think all of that kind of mixes up a
8 bunch of different things, which, like in the -- I think this
9 news article mixes up a bunch of different things, so it is
10 kind of hard to respond to.

11 THE COURT: All I'm asking is for you -- not trying
12 to test the article and what it may or may not -- but are you
13 aware or not of a representative of the Secretary of State's
14 office attempting to clarify, from your perspective, that the
15 office did not know about or begin investigating Coffee County
16 until July of '22? That is all I'm asking.

17 THE WITNESS: The other thing happening at this time
18 frame was Secretary Raffensperger was running for reelection.
19 And so when he says an aide, I don't know if he knows -- if he
20 means a campaign aide or a Secretary of State office person.

21 THE COURT: This one just talks about a
22 representative with the Secretary of State's office, if you
23 just want to look at that.

24 THE WITNESS: I see what it says, and I don't know if
25 that is accurate is all I'm saying.

1 THE COURT: All right. And you're not aware of it
2 one way or the other that there was a clarification provided,
3 that this was the clarification provided by the Secretary of
4 State's office?

5 THE WITNESS: That what was a clarification provided?

6 THE COURT: That the Secretary of State's office
7 clarified that the office did not know about or begin
8 investigating Coffee County until July of 2022.

9 THE WITNESS: Well, if that was provided, it is not
10 accurate.

11 THE COURT: Okay.

12 MR. CROSS: Thank you, Your Honor.

13 THE WITNESS: And I would say that happens -- that
14 happens with press statements, particularly when -- I do recall
15 in this interview, the stated topics were not what was then
16 asked, and so that leads to confusion, generally.

17 MR. CROSS: Your Honor, we offer 146 into evidence.

18 MR. BEDARD: No objection, just subject to our
19 hearsay objection.

20 THE COURT: All right. Admitted subject to that
21 hearsay objection.

22 MR. CROSS: Your Honor, we also offer the video clip
23 that I just played of the Secretary's interview is Exhibit 575,
24 and so we offer that in as well.

25 MR. BEDARD: I don't think we've got an objection as

1 long as we do the whole thing. It is a little odd because it
2 is just obviously a video clip out of court. But our
3 understanding is he is also a party, so I'm trying to think
4 about -- we might just need to do the long --

5 THE COURT: Why don't you sit down and look at what
6 you --

7 MR. BEDARD: Sure. Thank you.

8 THE COURT: -- agree on, anything else that you think
9 is relevant to include.

10 MR. CROSS: Okay.

11 MR. BEDARD: Thank you.

12 MR. CROSS: We'll do that, Your Honor.

13 BY MR. CROSS:

14 **Q.** All right. Sir, I can't remember if I asked you this, so
15 I apologize if I did. I just want to make sure.

16 The breaches in Coffee County, as you guys learned about
17 those, there was never a time when the Secretary's office
18 alerted DHS/ISAC, as you referred to it earlier to that; is
19 that right? To your knowledge?

20 **A.** I don't think we did. I shouldn't say that. I should say
21 I'm not aware of that.

22 **Q.** Given your role as general counsel and the importance of
23 that type of alert, would you expect someone to inform you if
24 that alert had been made to DHS?

25 **A.** Not necessarily. That type of incident, investigating an

1 actual, you know, incident, like a physical access, it seems --
2 it is different from, for instance, the earlier email that we
3 forwarded; whereas, they really do more of the sort of cyber
4 investigation, trying to figure out who somebody is based off
5 of an email; whereas, I mean, we thought that for this one, GBI
6 boots on the ground was more -- the more appropriate referral.

7 **Q.** And to your knowledge, no one at the Secretary's office
8 alerted DHS to the presence of the Cyber Ninjas card in the
9 office in May of 2021? Meaning in, May of 2021, to your
10 knowledge, there was no alert made to DHS of that report;
11 right?

12 **A.** Not to my knowledge.

13 **Q.** And you would expect someone to have alerted you if that
14 was being a report to DHS at that time?

15 **A.** Not necessarily. Reporting to DHS, reporting to MS-ISAC
16 is really just kind of forwarding --

17 **THE COURT:** I'm sorry. If I didn't understand the
18 words because they were coming out fast, I can't imagine --

19 **THE WITNESS:** Reporting something to DHS/MS-ISAC is
20 really just forwarding kind of something suspicious, suspicious
21 emails in particular.

22 **THE COURT:** Well, do you know whether something --
23 anyone in the department did that, whether it is --

24 **THE WITNESS:** I don't know. I'm saying that to
25 say -- but it might not be something that if someone does, they

1 would necessarily let me know about it.

2 BY MR. CROSS:

3 **Q.** You're aware that while you were the general counsel, that
4 CISA -- C-I-S-A -- cybersecurity agency within DHS, put out an
5 advisory confirming vulnerabilities found in the Dominion BMD
6 system; right?

7 **A.** Yes.

8 **Q.** And you're aware that they recommended about a dozen
9 mitigation measures?

10 **A.** I can't recall the number, but I recall they had some
11 mitigation measures, yes.

12 **Q.** And are you aware that that CISA advisory came out of
13 something called a CBD process?

14 **A.** Yes.

15 **Q.** And the CBD process began when this Court authorized the
16 release of Dr. Halderman's July 2021 report to CISA in or
17 around February of 2022.

18 Does that sound right?

19 **A.** I know that the -- I don't know the dates, but I know that
20 the C -- yes, that it came out of this Court's kind of approval
21 of that.

22 **Q.** In your role as general counsel for the Secretary's
23 office, did you or anyone else, to your knowledge, at the
24 Secretary's office have any involvement or communications with
25 CISA during that CBD process?

1 **A.** I recall I had some communications with CISA. I think at
2 that point, it was more of a, hey, heads-up, this is about to
3 come out.

4 We didn't have any sort of, I guess, role in their
5 process.

6 **Q.** And I was going to ask about this.

7 So, to your knowledge, did anyone at the Secretary's
8 office have any kind of input, for example, into the CBD
9 process or into the advisory that came out?

10 **A.** Not to my knowledge.

11 **Q.** Do you know whether anyone at the Secretary's office
12 received a draft of the advisory before the final advisory was
13 released?

14 **A.** I recall having some conversations with CISA, and it is
15 possible we received an embargoed draft. I can't specifically
16 recall.

17 **Q.** Okay. We'll come back to that because I'll pull that up
18 to help.

19 Do you recall that in January of 2022, the Secretary
20 released a public statement together with Dominion calling for
21 the public release of Dr. Halderman's report?

22 **A.** I'll take your word on the time frame, but yes, I recall
23 that statement.

24 **Q.** Yeah. And up until that point, you understand -- we
25 talked about this a little bit yesterday.

1 Up until that point, do you understand that it was the
2 State defendants' lawyers that had been asking the Court to
3 treat that report as attorneys' eyes only, or you don't know?

4 **A.** I don't know.

5 **Q.** Just yes or no -- because I don't want to get into
6 privileged communications -- did you have any discussions with
7 the Secretary or anyone else in the Secretary's office before
8 he called for the public release of Dr. Halderman's report?

9 **A.** I'm sure that I would have.

10 **Q.** As you sit here, can you specifically recall having a
11 discussion on that topic?

12 **A.** I can't, but for the same reasons we've talked about
13 before. But that is generally something I would have been
14 involved in.

15 **Q.** And do you know why -- again, I don't want you to
16 speculate to the Secretary's mindset or get into hearsay, so
17 your knowledge.

18 On your own knowledge, do you know why the Secretary
19 reversed course?

20 MR. BEDARD: Objection, Your Honor. To the extent it
21 calls for attorney-client privilege and work product, this is
22 obviously clearly an issue that is going on in the course of
23 this litigation.

24 So I think having conversations with the Secretary as
25 the general counsel while this is going on in the litigation, I

1 think, is privileged.

2 MR. CROSS: Well, can we get an answer? Because if
3 he says no, then it doesn't matter.

4 BY MR. CROSS:

5 **Q.** Do you know why the Secretary's office suddenly decided to
6 call for the release, just yes or no?

7 MR. BEDARD: No, Your Honor. Because if he had said
8 yes, I mean, that discloses again that he's had conversations
9 with his attorney.

10 MR. CROSS: It didn't disclose --

11 MR. BEDARD: The fact that the conversation with the
12 attorney is itself privileged.

13 MR. CROSS: That is not how privilege works. It is
14 advice. We're not asking for any legal advice.

15 And again, your Honor --

16 THE COURT: You're asking, on your own knowledge, do
17 you know why the Secretary reversed course and urged that
18 the --

19 MR. CROSS: Your Honor, let me ask a different
20 question that may be easier. Let me try this.

21 BY MR. CROSS:

22 **Q.** Mr. Germany, do you know who at the Secretary's office
23 made the decision to publicly call for the public release of
24 Dr. Halderman's report?

25 **A.** Secretary Raffensperger would have the final say on that.

1 **Q.** I do not want you to speculate about his reasons or offer
2 hearsay.

3 So my question is: You as a general counsel, do you know
4 why the Secretary called for the public release of the report
5 when he did?

6 **A.** I think he was frustrated that there was a lot of kind of
7 media talking about what it is without actually really what it
8 is.

9 I think he called for other -- release of other -- other
10 things as well in that statement, if I recall correctly. And I
11 think, you know, there was frustration that there was a lot of
12 things being discussed, particularly in the media, without, you
13 know, really the ability of anybody to make a judgment for
14 themselves.

15 **Q.** Okay. But you said you think.

16 If it is his decision, the reality is, you don't know why
17 he made that decision; right? Because the only way you could
18 know it is crawl in his head or tell us something he said; is
19 that fair?

20 **A.** I certainly can't crawl in his head.

21 **Q.** Right. And so the other way is you would have to tell us
22 something he said to you; is that right?

23 **A.** So I have a lot of conversations with the Secretary and
24 other people in the office, so, you know, I guess -- it is
25 difficult to just go back and put myself back in time. I wish

1 I could do that. I really can't do that.

2 I recall generally the -- doing that, and I recall
3 frustrations. And I believe it was him, so I'm kind of
4 inferring it must have been something he said. He was
5 frustrated on those things.

6 MR. CROSS: And I don't want you to -- to your point,
7 Mr. Bedard, I don't want you to speak to anything you talked to
8 him about. I don't want you to convey any communications that
9 are privileged. I don't want you to speak for him because it
10 is also hearsay. Okay?

11 MR. BEDARD: But with that point --

12 MR. CROSS: I'm sorry. Go ahead.

13 MR. BEDARD: With that point -- and I appreciate
14 that, David -- then I just wonder what the relevance of this
15 line of questioning is -- if we're not getting into privileged
16 conversations or hearsay conversations, why we're going down
17 the line.

18 THE COURT: Well, because he might have -- the
19 Secretary might have articulated this not in the context of a
20 privileged conversation.

21 MR. BEDARD: But I guess what I'm saying is, he's the
22 general counsel of the Secretary's office. This is clearly
23 going on in the middle of this litigation. I can't conceive a
24 conversation in that circumstance that wouldn't be privileged.

25 THE COURT: Well, I can. You can imagine a group of

1 people talking in the office, that not all the communications
2 would be privileged. That's all.

3 I mean, it might have been a media strategy. It
4 might have been a communications strategy. It might -- in many
5 different contexts. So the witness may not know that. I
6 realize that, and that is -- but he also may know it because he
7 was involved in the highest levels in the functioning of the
8 office.

9 But I'm not sure that, frankly, plaintiffs' counsel
10 is going to get to that, but that is really the way that
11 somebody would know without breaching any sort of
12 attorney-client privilege.

13 MR. BEDARD: And just for the record, Your Honor, I
14 understand you want to be able to proceed. I would just then
15 lodge a relevance objection as to why the Secretary's personal
16 decision-making is relevant. But fair enough.

17 THE COURT: All right.

18 BY MR. CROSS:

19 **Q.** Did the Secretary tell you at any point why he called for
20 the public release of Dr. Halderman's report in a statement
21 that you would not consider privileged as general counsel?

22 **A.** I think what I can speak to is my general recollection of
23 those events. I don't recall specific conversations, but I do
24 recall that he was frustrated that this was something that was
25 being -- the Halderman report was something that was being

1 talked about in the media particularly, that there was other
2 statements Mr. Halderman made in this courtroom that were not
3 public, that I think there was a feeling by him and others in
4 the office that at this point -- because I recall going back
5 to --

6 **Q.** Sorry, Mr. Germany. Just let me be clear because I don't
7 want to miss each other. I'm not asking you to share what you
8 think he was feeling. It is a very specific question.

9 **A.** Okay. But here is the thing. I have already said I don't
10 remember specific conversations.

11 **Q.** Which I get. So what I'm taking from that is: There is
12 not a specific statement you can share with the Court today
13 where you recall the Secretary saying to you, Mr. Germany, this
14 is the reason I'm calling for the public release of the report?

15 **A.** All I can say is what I have already -- that is my -- that
16 is the best of my recollection on this.

17 **Q.** Got it. Thank you. Thank you. I appreciate that.

18 MR. CROSS: Pull up Plaintiffs' Exhibit 139, please,
19 real quick.

20 Can you pull up 85?

21 BY MR. CROSS:

22 **Q.** Okay. Mr. Germany, do you recognize this as the public
23 statement that went out from the Secretary's office on
24 January 7 -- January 27 of 2022, calling for the public release
25 of what he refers to as a secret report?

1 **A.** Could you go back to where I can see the whole thing?

2 Yes. That looks like that.

3 **Q.** Okay.

4 MR. CROSS: Your Honor, we move Exhibit 85 into
5 evidence.

6 MR. BEDARD: No objection, Your Honor.

7 THE COURT: Okay. It is admitted.

8 THE WITNESS: And I would just add, it says secret
9 report and pre-election testimony.

10 BY MR. CROSS:

11 **Q.** Right. And that is referring to testimony that was under
12 seal from the September 2020 hearing; is that right?

13 **A.** Yes.

14 **Q.** Okay. Do you know, just yes or no, before Secretary
15 Raffensperger made the decision to call for the release of the
16 report in that sealed testimony whether he considered the
17 security implications of releasing that information?

18 Just yes or no, if you know.

19 **A.** I know that is something that he considers, generally.

20 **Q.** But you don't know specifically whether he considered it
21 before making this decision?

22 **A.** I don't -- I don't recall specific conversation about
23 that. And like you said earlier, I can't crawl in his brain.
24 I know that is something he considers generally in his
25 decision-making.

1 Q. Do you know who he relied on to advise him on the security
2 implications of releasing this report?

3 A. I think the frustration was that the report had already
4 essentially been released.

5 Q. That's not my question, Mr. Germany. I'm sorry. That's
6 not my question.

7 Do you know, yes or no, who he relied on, if anyone, to
8 advise him on the security implications of releasing the report
9 and the testimony?

10 A. I think he would have relied on me. I hope so. I was
11 somewhat -- I would have been involved in those conversations.

12 Q. But you don't recall that?

13 A. I'm sorry?

14 Q. You don't recall that happening?

15 A. I don't recall -- I can't just go back in time and recall
16 this. I'm sorry.

17 Q. Well, this was not a minor event; right? I mean, you guys
18 had been telling the Court, your lawyers have been telling the
19 Court --

20 A. We've had a lot of major events.

21 Q. Fair enough. Fair enough.

22 But in this case, your lawyers have been telling the Court
23 for six months or so that this needs to be remained under seal
24 because it has serious security implications, and then I think
25 we were literally in court in a conference when this came out

1 talking with the Judge.

2 **A.** I think my --

3 MR. BEDARD: Again, objection, Your Honor. I think
4 it assumes facts not in evidence again about what we're
5 representing to the Court, all this sort of stuff. Some of the
6 earlier questions were about whether he was aware of something.

7 Let me slow down and rephrase, and I'll just make it
8 quick.

9 THE COURT: Thank you.

10 MR. BEDARD: I think it assumes facts in evidence
11 because it is assuming what was going on between counsel and
12 discussions with this Court, and the reality was the report was
13 AEO. So I just don't see the -- not only the relevance, but I
14 do think it is assuming facts in evidence about what was
15 represented to the Court.

16 THE COURT: Well, I think there are other ways of
17 providing information about this since the witness doesn't --
18 doesn't seem to be able to respond to your question.

19 MR. CROSS: Let me try it a different way.

20 Did I offer this? Is this in evidence?

21 MR. BEDARD: Yes.

22 MR. CROSS: Thank you.

23 Let's pull this down.

24 BY MR. CROSS:

25 **Q.** Do you recall that -- in January of 2022, do you recall

1 that you were the only individual in the entire Secretary of
2 State's office and among the SEB who had read Dr. Halderman's
3 report?

4 **A.** I would have to piece together the timeline. If you could
5 remind me when it was, kind of -- if that was before it was
6 allowed to be released further by the Court, then that -- then
7 that would be true.

8 **Q.** Are you aware that Mr. Sterling testified in his February
9 '22 deposition that you were the only individual who had read
10 the report at the time that he was being deposed?

11 **A.** I'm not aware of that.

12 **Q.** Do you have any reason to believe he is wrong?

13 **A.** I'm just trying to -- at some point it was -- I was
14 allowed to release it further, and I just can't recall when
15 that was.

16 **Q.** As you sit here, can you --

17 **A.** If it was before that time, then I was the only one. If
18 it was after that, then I wouldn't have been.

19 **Q.** As you sit here, can you identify any one individual who
20 you know read Dr. Halderman's report before Secretary
21 Raffensperger called for it to be released other than you in
22 the office?

23 **A.** I can't recall if that was before or after I was allowed
24 to share it broadly. I think we discussed that yesterday. I
25 just can't recall the date.

1 Q. And you don't have any computer science background; right?

2 A. Correct.

3 Q. No cybersecurity background?

4 A. Correct.

5 Q. And so if Mr. Sterling was right, that as of January '22
6 when this -- when Secretary Raffensperger made the decision to
7 call for the release of this report, the only person who in his
8 office could have advised him having read it would be you
9 without any computer science training; is that right?

10 A. I think the difference is the frustration that was
11 happening was there was a lot of media reports about this
12 report --

13 Q. That is not what I'm asking, sir.

14 A. -- so that led to frustration.

15 Q. That is not what I'm asking you.

16 THE COURT: Sir, could you just answer the question,
17 which -- you want to read what the question was?

18 (The record was read back by the court
19 reporter.)

20 THE WITNESS: I would have been the only person who
21 read the complete report. There are other people who, of
22 course, had read media accounts of what was in the report.

23 MR. CROSS: Okay. Can we pull up Plaintiffs'
24 Exhibit 314 quickly?

25

1 BY MR. CROSS:

2 Q. Do you recognize this as an embargoed version and early
3 version of the CISA alert advisory that went out in the summer
4 of 2022 regarding Dr. Halderman's findings?

5 A. That is what it looks like.

6 Q. Okay. And you mentioned before -- does this refresh your
7 recollection that you or others in your office received this
8 embargoed report around that time?

9 A. Just based on the fact that it says, State defendants, as
10 something we produced, makes me think that. I still don't
11 recall that.

12 Q. Fair enough.

13 MR. CROSS: Your Honor, we move 314 into evidence.

14 MR. BEDARD: No objection, Your Honor.

15 THE COURT: 314 is admitted.

16 MR. BEDARD: One quick question, David.

17 Never mind. We can address it later.

18 MR. CROSS: All right. Can we pull up Slide 7 real
19 quick? Play this.

20 **(Playing of the videotape.)**

21 BY MR. CROSS:

22 Q. Do you recognize where he is sitting?

23 A. That is the Secretary of State's office in the capitol.

24 Q. That is his official Secretary of State's office?

25 A. Yes.

1 Q. And he often does -- makes public statements from that
2 office as the Secretary of State; is that fair?

3 A. That's probably -- I mean, I would say he conducts more,
4 like, media interviews or things like that there.

5 Q. And in this statement, sitting in his official Secretary
6 of State's office, in the comments that he was just making
7 responding to Dr. Halderman's report, he is not offering a
8 personal opinion; right? He's talking as the Secretary of
9 State, is he not, sir?

10 A. I mean, he's the Secretary of State.

11 Q. And he is speaking from his office as the Secretary of
12 State responding to Dr. Halderman's report; right?

13 A. Yes. He -- yes.

14 Q. Okay.

15 MR. BEDARD: Just I would object on the ground here,
16 Your Honor, it hasn't been fully authenticated. I'm not
17 necessarily, again, doubting the fact that the Secretary made a
18 statement, but it was a little jumpy, and I'm not sure it
19 includes the full question either, so the entire --

20 THE COURT: You can verify it and raise it again if
21 there was, in fact, something that was material omitted.

22 BY MR. CROSS:

23 Q. Can we agree that is the Secretary of State?

24 A. Yes.

25 Q. Okay.

1 MR. CROSS: Your Honor, we move Plaintiffs'
2 Exhibit 491, which is this video, into evidence.

3 THE COURT: Well, it is admitted but subject to the
4 review of defense counsel to see if anything is material that
5 has been omitted that needs to be added back in.

6 MR. BEDARD: Thank you, Your Honor.

7 What number was that, David?

8 MR. CROSS: 491.

9 MR. BEDARD: 491. Thank you.

10 MR. CROSS: Can we bring up Slide 11?

11 BY MR. CROSS:

12 Q. This is Plaintiffs' Exhibit-- this is an excerpt quote
13 from Plaintiffs' Exhibit 196 at Page 143. Secretary
14 Raffensperger --

15 MR. BEDARD: Hold on, David.

16 THE COURT: Wait a second. I think there is a
17 standing objection.

18 MR. CROSS: Oh, I'm sorry.

19 MR. BEDARD: Object again. I want to make sure I'm
20 getting my objections exactly right. I think you get the
21 substance of it.

22 I don't know if it's the best evidence rule or one of
23 the other ones. But I think if we're referencing a document,
24 he should put the document up, not a slide from his opening
25 argument.

1 MR. CROSS: I just want to know if he is familiar
2 with the statement.

3 MR. BEDARD: But again --

4 THE COURT: But I think you have to tell him the
5 context. You can't just say you want the -- is he familiar
6 with the statement --

7 MR. BEDARD: I guess my point is --

8 THE COURT: I understand. I'm asking -- I think it
9 is proper to give him at least some idea of what the context of
10 the statement was.

11 MR. CROSS: Okay. All right. Take that down. We'll
12 come back to that.

13 Thank you, Your Honor.

14 THE COURT: I would just point out there is no date
15 and time, et cetera, so there is no context at the moment other
16 than the fact that he said it, which I don't know that they
17 will object. But it is not really fair not to give some
18 context.

19 MR. CROSS: Right.

20 BY MR. CROSS:

21 **Q.** Let me just ask you --

22 MR. CROSS: We can pull it down off the screen, Tony.

23 BY MR. CROSS:

24 **Q.** Let me just ask you this: As a lawyer and as a former
25 general counsel of the Secretary of State, do you agree that

1 the ultimate fact-check in the United States occurs in courts
2 of law where witnesses swear to tell the truth or risk
3 imprisonment and where lawyers must also tell the truth or risk
4 disbarment? Do you agree with that sentiment?

5 **A.** Generally, yes.

6 **Q.** Okay.

7 **A.** I think that is specifically referring to post 2020 claims
8 that came up surrounding the 2020 election in Georgia.

9 **Q.** And you agree with the sentiment, if you want to know the
10 truth, watch what happens in court?

11 **A.** I don't think that courts are infallible, if that is what
12 you're asking.

13 **Q.** I'm just asking if you agree with that sentiment.

14 **A.** I think in the context of Secretary Raffensperger's book,
15 the point he was making, I think -- I think yes.

16 **Q.** And you recognize those are statements that Secretary
17 Raffensperger himself has made; right?

18 **A.** Well, I saw you reading them from his book, so that is
19 what I'm referring to.

20 THE COURT: Laser vision.

21 BY MR. CROSS:

22 **Q.** Have you read his book?

23 **A.** Yes.

24 **Q.** Okay.

25 **A.** I have a signed copy.

1 Q. Did you read it last night because you thought I might
2 ask?

3 Just joking.

4 A. But I have read the whole thing, for the record.

5 Q. Cover to cover?

6 All right. Good.

7 THE COURT: And he's prepared now to be tested on it,
8 apparently.

9 BY MR. CROSS:

10 Q. Well, I asked you to recite something before, and you
11 couldn't, so I won't do it.

12 THE COURT: Don't say that. Come on.

13 MR. CROSS: I'm joking.

14 BY MR. CROSS:

15 Q. All right. Let me just make sure I am done.

16 In your role as general counsel for the Secretary's
17 office, did you have an understanding of whether the Secretary
18 of State -- putting aside Mr. Raffensperger -- whether the
19 Secretary of State, whoever that is, has some sort of legal
20 duty to act in good faith to make sure that they are providing
21 accurate information when they are making statements as the
22 Secretary of State?

23 THE COURT: All right. There is an objection from
24 counsel.

25 What is your objection?

1 MR. BEDARD: I think you got where I was going. It
2 is calling for a legal conclusion.

3 THE COURT: I don't think it is a necessary question.
4 Let me put it that way.

5 MR. CROSS: Okay. Well, then I will withdraw it
6 because I certainly don't want Your Honor to consider
7 unnecessary things.

8 So let me just make sure these are in evidence.
9 Sorry. I really should have her do this because she is much
10 better at it.

11 584, did we move that in?

12 MR. BEDARD: To be honest with you --

13 MR. CROSS: That was the email exchange between me
14 and Mr. Russo about hacked.

15 MR. BEDARD: Do you have a --

16 COURTROOM DEPUTY CLERK: 584?

17 MR. CROSS: Yeah.

18 COURTROOM DEPUTY CLERK: I'm not showing it.

19 MR. BEDARD: No objection to 584, Your Honor.

20 MR. CROSS: Plaintiffs' Exhibit 130, can you pull
21 that up? It is the June 8 acceptance test.

22 We'll move that in if I didn't do that already.

23 MR. BEDARD: It is not -- it doesn't have a Bates
24 number on it; right?

25 MR. CROSS: Yeah, you guys filed it when the Court

1 requested it, so we --

2 MR. BEDARD: Is that our docket entry?

3 MR. CROSS: Yes.

4 MR. BEDARD: Are we sure about that?

5 Then yeah, then that is fine. No objection.

6 MR. CROSS: Okay. Thank you.

7 MR. BEDARD: I believe you can understand if I don't
8 have all 1,700 docket entries memorized.

9 MR. CROSS: I get it. I get it. We said 589 is in.
10 Is 589 in?

11 COURTROOM DEPUTY CLERK: Yes.

12 MR. CROSS: It is? Thank you, Mr. Martin.

13 148, oh, no, I'm not offering that. Okay. Sorry.

14 THE COURT: That's all right.

15 MR. CROSS: Sorry. Not so good at the procedural
16 stuff.

17 Thank you, Your Honor.

18 THE COURT: Is defense counsel planning to examine
19 the witness or reserve until -- I'm sorry. Go ahead.

20 MR. BROWN: I have very brief questions, Your Honor.

21 THE COURT: That's fine.

22 CROSS-EXAMINATION

23 BY MR. BROWN:

24 **Q.** Mr. Germany, I'm Bruce Brown. Good to see you.

25 **A.** Good to see you.

1 Q. Let me take you back to December 2020, right after the
2 general election.

3 Do you recall the subject of litigants trying to get
4 access to Coffee County's election equipment in litigation that
5 was filed in federal court in December of 2020?

6 A. We had a lot of litigation. I can say I generally recall
7 that. I don't know that I -- I can't say I specifically recall
8 it.

9 Q. Right. It was a case -- the style of the case to
10 reflect -- to refresh your recollection is *Pearson v. Kemp*, and
11 just for the record, that is 20-CV-0409 before Judge Batten --

12 A. That's the Kraken --

13 Q. The Kraken case. Thank you. You anticipated my next
14 question.

15 And it was brought by Sidney Powell and Harry MacDougald.
16 Do you recall that case?

17 A. I recall Sidney Powell. I'll take your word for
18 Mr. MacDougald.

19 Q. And in that lawsuit, they were seeking specifically
20 election equipment from Coffee County; right?

21 A. I don't -- I don't dispute that. I can't specifically
22 recall that.

23 Q. You don't recall that? Okay.

24 Do you recall that also in December that you testified in
25 front of the House Affairs Committee, Representative Fleming's

1 committee?

2 **A.** In December 2020?

3 **Q.** Yeah.

4 **A.** I recall testifying in -- I think it was a Zoom and it
5 was -- did you say Government Affairs?

6 **Q.** Yes.

7 **A.** I think it was Shaw Blackmon, I think, was the chairman.
8 Yes, I do recall that. Yes.

9 **Q.** And that is the Government Affairs -- it is chaired by
10 Shaw Blackmon?

11 **A.** It was at the time, I believe.

12 **Q.** And do you recall that Representative Fleming asked you
13 about the Kraken lawsuit which sought records from Coffee
14 County?

15 **A.** I don't recall that.

16 **Q.** Okay. I'm going to fast-forward to June of 2021, and the
17 subject is the replacement of the server in Coffee County.

18 Are you with me?

19 **A.** Yes.

20 **Q.** Now, Mr. Barnes contacted you about replacing the server
21 in Coffee County.

22 Do you recall that?

23 **A.** Could you clarify.

24 Are you talking about James Barnes from Coffee?

25 **Q.** Thank you. Michael Barnes.

1 **A.** Michael Barnes contacted me?

2 **Q.** Yes.

3 **A.** I don't recall that.

4 **Q.** You don't recall that?

5 **A.** Correct.

6 **Q.** When -- you are obviously familiar with Georgia's election
7 laws about what counties have to retain, what records counties
8 have to maintain after an election; right?

9 **A.** Generally, yes. I always like to refer back when being
10 asked something.

11 **Q.** And -- but, in general, counties, both under federal and
12 state law, have an obligation to retain election records in the
13 county for a period of time after an election or a runoff;
14 right?

15 MR. BEDARD: Objection, Your Honor. Calls for a
16 legal conclusion.

17 THE COURT: Well, he's -- I mean, either the law says
18 that or not. If it is something that is only decided by the
19 Georgia Supreme Court, that is something different.

20 But to your knowledge, is that a requirement of
21 Georgia law based on your experience and expertise as general
22 counsel?

23 Do you want him to ask the question again?

24 THE WITNESS: Yes.

25

1 BY MR. BROWN:

2 Q. Counties have to keep election records for a period of
3 time, like two years, after an election; right?

4 A. So there is a requirement in Georgia law that they have to
5 keep election records under seal in superior court for
6 two years. There is an additional requirement under federal
7 law that is similar. I think it is a 22-month requirement.
8 And then, of course, there's always questions about well,
9 what -- what does that entail exactly? What scope of records
10 does that entail?

11 Q. And when -- and when the Secretary of State took Coffee
12 County's server, they left Coffee County without a copy of
13 their election records; right?

14 A. No.

15 Q. Did they make a copy of the server?

16 A. In -- generally, the practice is in records that are kept
17 in superior court by counties under seal, that includes a copy
18 of the election project.

19 Q. But isn't -- doesn't the law require that the records,
20 like, on the server be kept in the county for a period of
21 two years?

22 MR. BEDARD: Again, objection, Your Honor, to the
23 extent it is calling for a legal conclusion about what is
24 required under Georgia law.

25 THE COURT: Well, and he can testify as to based on

1 his experience and in his specific capacity. If something is
2 wrong, he will obviously be able to clarify that it is wrong.
3 But he can -- this is what -- the essence of the work of the
4 elections -- of the Secretary of State's office still is to --
5 I mean, there are lots of other things, but one major one is
6 dealing with elections, which are the core of democracy, so --
7 and the law.

8 BY MR. BROWN:

9 **Q.** Can you answer the question?

10 **A.** So that is work that is done at the county level, and the
11 way that that is done is what I said earlier. A copy of the
12 election project file, which is the records, are kept in
13 superior court under seal for that two-year period.

14 **Q.** Do you recall any discussion with Mr. Michael Barnes or
15 anybody else about the fact that Coffee County did not have a
16 copy of its election records after the Secretary of State took
17 the server?

18 **A.** No. I don't think -- I don't know that that is an
19 accurate statement.

20 **Q.** But in any event, you don't recall any conversations about
21 that; right?

22 **A.** Correct. But also, that would have occurred -- generally,
23 the way that is supposed to occur is when documents are placed
24 under seal in superior court, that is included. And that
25 server that we replaced had nothing to do with documents that

1 were separately under seal in superior court.

2 **Q.** And it is your understanding that they are under seal in
3 the superior court and they don't have to keep it in the
4 election office?

5 **A.** They are told to keep it -- the law specifically says they
6 are kept under seal in superior court.

7 **Q.** Okay. Thank you, sir.

8 **A.** I should add to that, as I'm sitting right here now, to
9 the best of my recollection as to what the law specifically
10 says.

11 **Q.** The law says what it says; right?

12 **A.** Yes.

13 THE COURT: Did you have anything you wanted to ask,
14 Mr. Oles?

15 MR. OLES: I do, Judge.

16 THE COURT: Is it going to be short also?

17 MR. OLES: I can't get it done in 15 minutes is my
18 problem.

19 THE COURT: I see.

20 MR. OLES: It won't be long, but it is --

21 THE COURT: How long will it be?

22 MR. OLES: 45 minutes is what I'm --

23 THE COURT: That's long.

24 Well, you can't do 45 minutes today. Let me just --
25 thank you for telling me that.

1 Maybe you could provide us with a little more roadmap
2 of what you are hoping to cover because I think that is more
3 than I anticipated.

4 I'm not asking you to tell me every question by any
5 means, just the subject matter.

6 MR. OLES: Yeah. I am interested in several key
7 areas. I do have some questions for Mr. Germany regarding the
8 data deletion that took place back with the KS -- when KSU was
9 operating the CES. I have some questions regarding some claims
10 that were made with regard to ballots and Mr. Hall's affidavit.
11 I have some questions regarding --

12 THE COURT: Affidavit of Mr. Hall and what? I'm
13 sorry.

14 MR. OLES: And the third area would be, I also have
15 some questions about Coffee County, but not ones that were
16 covered.

17 THE COURT: Did the State intend to cross-examine the
18 witness now, or is it planning to call him as part of your
19 case, or are you just not planning to do anything?

20 MR. BEDARD: As it stands right now, I don't
21 anticipate asking him any questions right now. We do likely
22 anticipate calling him back in our case. Obviously, that
23 depends on if the Court allows Mr. Oles to question him.

24 I would express, I think, a little bit of concern
25 under the local rule, as we talked about, understanding that is

1 kind of a case-by-case basis. But we're now -- to require
2 Mr. Germany to come back after a long weekend three days when
3 he's already been testifying for a day and a half, and I
4 think -- and I don't want to get too much into it -- but I
5 think on some things that were tangentially relevant. We're
6 going to be talking about discovery disputes. There's a lot of
7 time spent on that.

8 And I'm not questioning -- again, Mr. Cross, he was
9 entitled to do that and he took his time.

10 Thank you. Well, there we go.

11 So I just -- we're taking a long time. We've already
12 had witnesses who have had to come twice, go home now, come
13 back again over the long weekend. I just don't see the benefit
14 of doing this.

15 MR. CROSS: Could I just add, Your Honor, I share the
16 State's concern? Because we have a limited amount of time. We
17 want to move quickly. This is the first that I've heard that
18 Mr. Oles has any questions at all, much less 45 minutes.

19 THE COURT: Well, why don't we do this, I mean,
20 because I can't be here for 45 minutes --

21 MR. CROSS: Can the Court direct him to do it in 15?
22 I mean --

23 THE COURT: Well, I think that takes time on the part
24 of somebody to sort of frankly reduce what they are going to
25 do. I mean, I'm happy to do that if -- but if Mr. Oles

1 thinks -- I mean, I'm happy to go 20 minutes if Mr. Oles thinks
2 he can fit himself into 20 minutes.

3 I will say that -- I mean, there's some tricky
4 issues -- just matters here that we have a substantial record
5 in this case regarding KSU. And yes, we could repeat the whole
6 thing, but unless somebody -- but I think that they were --
7 well, it is self-serving for me to say that I thought they were
8 well -- that they were well-presented, completely presented,
9 addressed at length about the KSU server, the deletion of the
10 functioning of the CES office in that capacity. We had an
11 incredible volume of that evidence that is in the record.

12 So my concern is going over that again because --
13 but, of course, if on the other side of it that the State says
14 that none of that can be properly considered because we're not
15 reintroducing everything, that is a whole other matter.
16 Because, you know, the functioning of the CES office, even if
17 it was at a different location, is still relevant over time.

18 MR. BEDARD: And I would have to confer with
19 co-counsel because that is obviously a big question you're
20 asking.

21 THE COURT: I mean, this is a question about other
22 hearings as well, frankly.

23 MR. BEDARD: Sure, absolutely, and that's a big
24 question. I would have to confer with co-counsel.

25 I think in a smaller sense, I think I've got on a

1 logistics level some concerns. One, I don't know what
2 Mr. Germany's availability is next week. Two, I'm not sure
3 that he is really the proper witness to ask those questions
4 about anyway.

5 It sounds like they had Mr. Barnes on the stand to
6 testify about some of those. It sounded like Mr. Oles was
7 going to ask him about Mr. Hall's affidavit.

8 So I just -- I'm not sure when it comes to
9 Mr. Germany -- and maybe we can answer the larger question
10 about the server issues at KSU. I'm still not sure it
11 necessarily answers the question about whether Mr. Germany
12 needs to come back.

13 THE COURT: Well, I don't know whether the
14 question -- the scope of the questions around Coffee County and
15 I don't know -- and obviously that counsel for Mr. Davis
16 feels -- they have already expressed that they had some degree
17 of conflict or difference in approaches. And everyone in the
18 State said he had a right to his own counsel, and very
19 affirmatively. So I have been guided by also everyone's
20 positions on that.

21 So my view is this, is that subject to something else
22 happening, I think the KSU -- unless there is something
23 terribly original about the KSU matter because Mr. Jordan -- it
24 might only be about the destruction of data, and I'm prepared
25 right now, which might be in your interest to go for 20 or 25,

1 you know, try to do it -- finish it if we just start this
2 moment and I can walk out of the courthouse at a quarter
3 after -- or at least walk out of my office, not out of the
4 courthouse. But if we can't do that, then I have to sort of
5 reboot.

6 So do you think you can do that? If you don't, then
7 I have to -- let me just meanwhile -- you look at your
8 questions, and are you -- are you able to come back on Tuesday?

9 THE WITNESS: I believe so.

10 THE COURT: But in either event, there is no way that
11 I'm allowing more than a half an hour, so you have to just
12 decide. I mean, there are advantages to you in getting it
13 moving forward, obviously. But otherwise, we'll just do half
14 an hour tomorrow -- on Tuesday.

15 MR. OLES: I understand, Judge. If I need to
16 consolidate to move -- and I think the Court knows I have moved
17 pretty efficiently --

18 THE COURT: You have.

19 MR. OLES: -- so far. With a little bit of extra
20 effort, I am sure I can meet that, but it wouldn't be now.

21 THE COURT: Okay. That's fine. Then we will put it
22 off until Tuesday. And you, meanwhile, can decide what you are
23 doing, whether there is any chance you want to examine him now,
24 I wouldn't -- and if not, that is fine too.

25 MR. BEDARD: Your Honor, if I can ask one question

1 about the local rule and one attorney per side. If we can at
2 least ask for some sort of guidance from the Court on the
3 amount to which plaintiffs need to maybe confer about what they
4 expect for their questioning so we can anticipate things like
5 this because as Mr. Cross said --

6 MR. CROSS: I agree with that, Your Honor.

7 MR. BEDARD: -- he hadn't heard anything about that
8 until today, so --

9 THE COURT: Yeah, well, I think --

10 MR. CROSS: To be clear, we confer very carefully.
11 In fairness to the State, when we provide them the witnesses we
12 plan to call and how long we think it will go, we assume that
13 we would hear -- so we agree. We will --

14 MR. BEDARD: I don't mean to question anybody. I'm
15 just --

16 THE COURT: All right. Well, I think that the
17 Coalition's counsel's questions have been very consolidated and
18 consistent with the spirit of what I've tried to relay, and
19 which I think most other judges will allow some extra
20 questions. I realize we have a different situation for
21 Mr. Davis' counsel and Mr. Davis that I'm trying to accommodate
22 with at the same time not completely distracting from the case
23 being presented by counsel who have actually litigated this
24 case for six years with great industriousness care.

25 So I would ask Mr. Oles, though, to be sure even

1 before you proceed on Tuesday to be in touch with plaintiffs'
2 other counsel regarding the scope of matters you're planning to
3 touch in case they think there is -- they have their own views
4 about, you know, whatever the risks or benefits are of the
5 route that you're pursuing because it could end up with -- you
6 know, there might be objections from your co-counsel.

7 So that is my concern. So this is all a delicate
8 area. So you do need to be in touch with them so that they can
9 respond to you no later than -- you know, than Monday so that
10 they can -- that you can consider this and you can all present
11 it and if we need to discuss it before the witness is on the
12 stand.

13 MR. OLES: Judge, I'll certainly confer with
14 co-counsel before Monday.

15 THE COURT: And then, you know, going forward, be
16 sure that you've really communicated. You know, it is one
17 thing to be jumping up with five minutes. It is really not the
18 real concern. It is really when we get something more
19 substantive than that.

20 And so for now, we're going to see you at 9:30 absent
21 something exploding on me. I know.

22 So in terms of the standards really of control of the
23 witness examination, Rule 611 provides the mode and order of
24 examining witnesses and presenting evidence. And among other
25 things, it says the Court should exercise reasonable control

1 over the mode and order of examining witnesses and presenting
2 evidence so as to: One, make those procedures effective for
3 determining the truth; two, avoid wasting time, which is, of
4 course, always a desire; and, three, protect witnesses from
5 harassment or undue embarrassment.

6 This case involves a huge volume of evidence and a
7 complex series of events over a substantial period of time, so
8 I have allowed more time for the examination of witnesses. I
9 don't think anyone has caused undue embarrassment. But I'm
10 sure that I will warn people if they start doing that.

11 But those are obviously the operating principles, and
12 we don't want to waste time -- avoid wasting time. The rule
13 does anticipate that a judge -- our local rule may -- you know,
14 can modify anything of the local rule and obviously does in a
15 variety of contexts.

16 I had a few questions at the end, but I'm going to
17 hold back for now, of the witness. And one of my law clerks is
18 writing me a note. I don't want to jump forward without -- do
19 you have -- okay.

20 And then I just wanted to talk a little bit about the
21 concerns that were expressed by Mr. Cross at the outset today
22 because they might --

23 MR. CROSS: Your Honor, can you release Mr. Germany?
24 Do you want to release him or do you want to --

25 THE COURT: Sure. But I will say --

1 MR. CROSS: Oh, sorry.

2 THE COURT: -- that I will release you. Don't talk
3 about your testimony with any other witnesses. To the extent
4 you are talking with counsel for the State, I just want to
5 advise you about something you probably know anyway, that you
6 must be careful in that connection not to be influenced in your
7 testimony in any regard by their statements or their
8 representations to you.

9 THE WITNESS: Yes, Your Honor.

10 THE COURT: You can be excused. Then I'll just go
11 over what I was going to say.

12 THE WITNESS: Thank you.

13 THE COURT: I've reviewed the ABA and Georgia rules
14 regarding whether counsel may confer with a witness during a
15 break in his testimony, which might happen overnight or during
16 the -- obviously during the course of the day.

17 While the rules do not prohibit counsel from speaking
18 to the witness during a break in the testimony, they do
19 prohibit counsel from coaching or having conversations that
20 encourage the witness to alter, amend, or modify his testimony
21 or otherwise influence the substance of the testimony.

22 So if a conversation was privileged and it was -- it
23 might be permissible to ask about if there is an attorney -- in
24 fact, an attorney-client privilege there -- it would
25 certainly -- and that conversation occurred in the course of

1 the day and you no longer had an attorney-client relationship
2 with the individual -- it is -- whether you did or you didn't,
3 you have to be very careful about influencing the substance of
4 the testimony. That is the problems about breaking people's
5 testimony over multiple days, and that is why the Supreme Court
6 has, among other things, noted one of the things that judges do
7 effectively is limit the time the person can be off the bench.
8 Because, otherwise, we get into these sorts of concerns.

9 And influencing a witness can happen in a variety of
10 ways, like suggesting evidence, suggesting that doesn't sound
11 right. It is in some ways easy, without even intending to
12 influence the testimony, to encourage effectively because of
13 the impact of the comments to affect the witness and cause him
14 or her to modify the testimony or influence the substance of
15 it.

16 Now, I'm not making any findings at this juncture
17 that that happened here at all. I don't have anything about
18 that, and we have the whole manner in which the counsel
19 spoke -- gave me no reason to think that. But I only go over
20 this for everybody at this juncture.

21 One of the things is: We have a very long trial
22 here, and so people speak over many days sometimes. And so
23 that is just inherent in the situation. As you know, I
24 typically advise everyone when they leave not to talk to anyone
25 else, and that is really trying to make sure they don't talk to

1 any other witnesses, first and foremost.

2 But I have to rely on counsel, ultimately, to conduct
3 yourself in such a way that you're not stepping over the
4 boundaries. There are certainly circumstances where you could
5 end up waiving privilege if you ended up discussing privileged
6 information, and then the person -- because of the fact that
7 you're asserting attorney-client privilege but it is not really
8 privileged, so --

9 MR. CROSS: Your Honor, could I just be clear?

10 THE COURT: But I don't know. You were speaking. I
11 mean, we went and looked at the rules again, but I don't know
12 whether there was something else other than the ABA and State
13 Bar rules that you were thinking about.

14 MR. CROSS: No. That is what I was thinking of, but
15 I just wanted to be really clear on the record.

16 I was not suggesting or insinuating that the State in
17 any way deliberately sought to affect his testimony. It was
18 more the concern Your Honor just made that sometimes the most
19 innocent of intentions, if you're talking about something, can
20 have an impact. So that is why I thought we were entitled to
21 just explore at least the topics.

22 But I do want to be clear, not at all suggesting or
23 implying or insinuating that anyone here was deliberately doing
24 anything unethical.

25 THE COURT: Okay. Anything else we should deal with?

1 Anything else that any counsel want to address at this time?

2 MR. BEDARD: I don't think so, Your Honor.

3 THE COURT: Do you-all have an idea of who the
4 witnesses are for Tuesday other than our repeat player?

5 MR. FISHER: Yeah. I think, Your Honor, the first
6 witness, aside from Mr. Germany, will be David Hamilton. Oh,
7 he can't come on Tuesday. That's right.

8 So we will do Frances Watson, Joshua Blanchard.

9 THE COURT: Well, I don't have to know everyone. I'm
10 just trying to make sure --

11 MR. FISHER: We have to reshuffle a little bit based
12 on witness availability. But certainly, those two, I think,
13 will be the next after Germany is done.

14 MR. TYSON: And, Your Honor, just on behalf of the
15 defendants -- and we're trying very hard to work cooperatively
16 with the plaintiffs on this. We have been going through a lot
17 of State-connected witnesses.

18 We just request that we really try to drill down. We
19 had four people who sat here most of the day today in
20 anticipation of testifying, two of which had been here before
21 and waited.

22 So just as much as we can, we'll keep working
23 together in trying to figure that out.

24 THE COURT: This is directed to plaintiffs' counsel.

25 Are you anticipating that the testimony here today

1 was of the length -- and yesterday was of a length that you can
2 see will be replicated in other witnesses?

3 MR. CROSS: For Curling plaintiffs, I think the only
4 witness that I have in mind that would be comparable would be
5 Gabe Sterling. But there is stuff I covered with Mr. Germany
6 that I don't now need to cover with him.

7 The others -- Watson will be relatively short.
8 Blanchard will be relatively short, maybe as short as -- it
9 could be as short as 10 or 15 minutes, depending on what they
10 have to say. Hamilton, we think probably 20 to 30 minutes.

11 The only other witness, potentially --

12 MR. BROWN: We're going to be taking the testimony of
13 two more board members. Those should both be medium. And then
14 short -- relatively short testimony from our remaining
15 plaintiff who hasn't testified yet because she's been ill.
16 That is Megan Missett.

17 MR. CROSS: And then Merritt Beaver will testify. I
18 need to talk to my colleague who is handling that.

19 But, again, the only one -- I mean, we didn't expect
20 this to go as long as it did. I won't comment on why. But
21 Gabe Sterling is probably the only one.

22 Well, maybe I should comment because I spent a lot of
23 time in deposition with Mr. Sterling, and he is also quite
24 explanatory in his answers.

25 THE COURT: Okay. I'm just trying to get --

1 understand what we're facing.

2 And you think there's any likelihood that we're going
3 to finish on Friday, or not?

4 MR. CROSS: Our hope was to finish by Thursday. Now,
5 again, this piece has taken longer, so we're going to revisit
6 and figure out what we can focus on.

7 But we certainly are aiming to be done by next week.
8 That will be the goal.

9 THE COURT: All right. Well, we will --

10 MR. TYSON: Your Honor, if I could ask one other
11 logistical question. Are our breakout rooms going to be the
12 same next week, or do we need to empty those rooms this
13 afternoon?

14 COURTROOM DEPUTY CLERK: No.

15 THE COURT: No, you don't have to do it.

16 MR. TYSON: Thank you, Your Honor.

17 THE COURT: Are there any other logistical matters?

18 MR. CROSS: I guess one that is worth raising, Your
19 Honor -- I know Your Honor needs to go.

20 THE COURT: And I assume that Dr. Halderman is going
21 to take a while?

22 MR. CROSS: Yes.

23 THE COURT: Maybe not, but --

24 MR. CROSS: Yeah. I'm sorry. For our -- that's
25 right. Yes.

1 THE COURT: And he may take a while for the
2 cross-examination too?

3 MR. CROSS: Yeah. That is a good point.

4 We do have deposition designations, and I think we
5 may have touched on this earlier. Our thought was to play
6 portions of deposition designations because we do think it is
7 important for Your Honor to be able to do a credibility
8 assessment like you would on the stand.

9 Whether -- in the ideal world, we would play those in
10 the courtroom, but we can talk about -- let us talk and figure
11 out what makes sense because we do want to get this case done
12 quickly. I don't know if Your Honor has a view on whether --

13 THE COURT: I don't know which ones you want to
14 present and how long they are.

15 MR. CROSS: The longest, I think, is 25 minutes,
16 roughly.

17 Right?

18 MR. FISHER: The longest individual clip is closer to
19 45.

20 MR. CROSS: Oh, okay. And the short ones and the
21 others were mostly what, about?

22 MR. BROWN: 70 minutes was the total.

23 MR. CROSS: What is the total?

24 MR. FISHER: It is close to like three hours, but
25 we're going to trim it back.

1 THE COURT: Have you shared the sections that you
2 want to do with the -- with defense counsel?

3 MR. CROSS: Yes. We provided the designations, but
4 we -- let me connect with the team and we'll make sure
5 because --

6 MR. TYSON: Your Honor, I just wanted to note that I
7 believe the times that Mr. Cross was just giving do not include
8 counter-designations that we have also provided to plaintiffs
9 for those. So I mean, from our perspective, you can review
10 that instead of taking up court time, but we can deal with that
11 after we talk with them.

12 THE COURT: Well, you-all can talk some more. It is
13 also not an all-or-nothing proposition, folks. You can decide
14 which ones you really want to have in open court and which ones
15 you could -- you could live with my looking at separately.

16 MR. CROSS: We will do that. We will do that.

17 THE COURT: Okay. All right. Anything else that you
18 folks have?

19 Okay. All right. Well, best wishes for MLK weekend.
20 And I think we got a lot done still this week. I'm sorry we
21 didn't get to conclude this witness, but almost, and we'll just
22 keep on rolling.

23 I understand that we're -- that you know this
24 yourselves -- producing a lot of text. That is comparable --
25 that is -- so -- to a large case.

1 But, anyway, all right, folks. Have a good weekend.
2 Take care of yourselves.

3 Stay warm. I think it is supposed to get very, very
4 cold. I'm just hoping we don't have any heating irregularities
5 in the building. It is a very temperamental building.

6 All right?

7 COURTROOM SECURITY OFFICER: Court stands in recess.

8 **(The proceedings were thereby adjourned at 2:08**
9 **PM.)**

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C E R T I F I C A T E

UNITED STATES OF AMERICA

NORTHERN DISTRICT OF GEORGIA

I, SHANNON R. WELCH, RMR, CRR, Official Court Reporter of the United States District Court, for the Northern District of Georgia, Atlanta Division, do hereby certify that the foregoing 158 pages constitute a true transcript of proceedings had before the said Court, held in the City of Atlanta, Georgia, in the matter therein stated.

In testimony whereof, I hereunto set my hand on this, the 12th day of January, 2024.



SHANNON R. WELCH, RMR, CRR
OFFICIAL COURT REPORTER
UNITED STATES DISTRICT COURT

UNITED STATES DISTRICT COURT
OFFICIAL CERTIFIED TRANSCRIPT

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