

IN THE SUPERIOR COURT OF FULTON COUNTY

STATE OF GEORGIA

TRANSCRIPT OF THE SPECIAL PURPOSE

GRAND JURY PROCEEDINGS

ATLANTA JUDICIAL CIRCUIT
COMMENCING JUNE 14, 2022

WITNESS: DR. ERIC COOMER

A P P E A R A N C E S:

ON BEHALF OF THE STATE OF GEORGIA:

NATHAN WADE, ESQUIRE
DONALD WAKEFORD, ESQUIRE
WILLIAM WOOTEN, ESQUIRE
ADAM NEY, ESQUIRE

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P R O C E E D I N G S

9:00 A.M.

1
2
3 MR. WADE: MADAM FOREPERSON, HAVE YOU
4 ASCERTAINED THE COUNT OF THE QUALIFIED GRAND JURORS
5 IN THE ROOM?

6 FOREPERSON: WE HAVE 16.

7 MR. WADE: SIXTEEN; WE CAN DO BUSINESS WITH
8 THAT.

9 GRAND JUROR: OKAY.

10 MR. WADE: ANY -- ANY HOUSEKEEPING BEFORE WE
11 CALL THE FIRST WITNESS?

12 OKAY, THEN. MR. NAY, WOULD YOU MIND GETTING
13 OUR FIRST WITNESS? WE'RE GOING TO CALL DR. ERIC
14 COOMER.

15 (WITNESS ENTERS.)

16 WHY DON'T YOU TAKE YOUR SEAT. OUR
17 FOREPERSON IS GOING TO SWEAR you IN.

18 GRAND JUROR: WILL YOU RAISE YOUR RIGHT
19 HAND, PLEASE?

20 ERIC COOMER,

21 HAVING BEEN FIRST DULY SWORN WAS EXAMINED AND
22 TESTIFIED UNDER OATH AS FOLLOWS:

23 MR. WADE: OKAY. GOOD JOB.

24 EXAMINATION

25 BY MR. WADE:

1 Q. ALL RIGHT. SO GOOD MORNING, SIR?

2 A. GOOD MORNING.

3 Q. WOULD YOU PLEASE INTRODUCE YOURSELF TO THESE
4 GRAND JURORS, PLEASE?

5 A. YES. MY NAME IS DR. ERIC COOMER. I WAS FORMERLY
6 THE CHIEF SOFTWARE ARCHITECT AND SECURITY PRODUCT
7 SPECIALIST WITH DOMINION VOTING SYSTEMS.

8 Q. WHAT -- WHAT DOES THAT MEAN IN ENGLISH?

9 A. SO I WAS IN CHARGE OF THE NEW PRODUCT DEVELOPMENT
10 WORKING WITH VARIOUS CUSTOMERS FINDING OUT, YOU KNOW,
11 WHERE THEIR DEFICIENCIES WERE IN THEIR PROCESSES AND
12 PRODUCTS. AND THEN, ALSO, PROVIDING GUIDANCE FOR
13 SECURITY SOLUTIONS TO INCREASE THE SECURITY OF OUR
14 VOTING SYSTEMS -- THE DOMINION VOTING SYSTEMS.

15 Q. WHAT IS YOUR EDUCATIONAL BACKGROUND, SIR?

16 A. SO I HAVE -- I HAVE A BACHELOR'S, MASTER'S, AND
17 PHD, ALL IN NUCLEAR ENGINEERING AND NUCLEAR PHYSICS.

18 Q. YEAH, LET'S UNPACK THAT. THAT'S A LOT.

19 A. YEAH. SO I HAVE A BACHELOR'S DEGREE IN NUCLEAR
20 ENGINEERING PHYSICS FROM WESLEYAN POLYTECHNIC INSTITUTE
21 IN NEW YORK. AND THEN, I HAVE A MASTER'S AND PHD FROM
22 UNIVERSITY OF CALIFORNIA, BERKLEY, IN NUCLEAR PHYSICS.

23 Q. SO ARE YOU WHAT'S COMMONLY REFERRED TO AS A
24 ROCKET SCIENTIST?

25 A. I DIDN'T ACTUALLY STUDY ROCKET PROPULSION. I --

1 I STUDIED (UNINTELLIGIBLE), AND CELLULAR POWER.

2 Q. WHAT DOES THAT EVEN MEAN?

3 A. I WAS LOOKING FOR NEW CLEAN ENERGY SOURCES BASED
4 ON FUSION ENERGIES THAT WHAT HAPPENED TO THE SIDE. SO I
5 TRIED TO THAT TO COMMERCIAL POWER.

6 Q. DID YOU EVER WORK IN THAT FIELD?

7 A. I DID. YOU KNOW, MOSTLY THROUGH GRAD SCHOOL, A
8 LOT OF MY RESEARCH WAS TO FUND A NEW PROJECT AT ONE OF
9 THE NATIONAL LABS, LAWRENCE LIVERMORE NATIONAL
10 LABORATORY OUT IN CALIFORNIA, AND IT'S CALLED THE NEXT
11 XPX (PH). BUT I -- I TRANSITIONED OUT OF THAT DEAL AND
12 WENT INTO SOFTWARE DEVELOPMENT SHORTLY AFTER I GOT MY
13 PH.D.

14 Q. SO YOU'RE PROBABLY THE SMARTEST PERSON IN THE
15 ROOM?

16 A. I WOULD NOT SAY THAT.

17 Q. YOU DON'T HAVE TO ANSWER THAT. THIS GUY IS,
18 CLEARLY.

19 TELL ME, WHAT -- WHAT HAVE YOU DONE SINCE GETTING
20 YOUR DEGREE? WHERE HAVE YOU WORKED?

21 A. YES. SO I -- I'VE DONE -- I'VE DONE QUITE A FEW
22 DIFFERENT JOBS. I WENT INTO CONSULTING BECAUSE OF THE
23 KIND OF WORK THAT I DID IN MY PH.D, I DEALT WITH LARGE
24 DATA SETS AND ANALYSIS OF DATA. SO FROM THERE, I WENT
25 INTO WHAT'S CALLED DATABASE DEVELOPMENT, LARGE DATA

1 SETS; ANALYZING THOSE. AND THEN, I EVENTUALLY
2 TRANSITIONED AFTER DOING SEVERAL CONSULTING JOBS. IN
3 2005, I ACTUALLY ENJOYED SUPPORTING VOTING SYSTEMS,
4 WHICH DOMINION VOTING SYSTEMS, ACTUALLY, ACQUIRED IN
5 2010. I WAS HIRED ORIGINALLY TO BE A DATABASE DEVELOPER
6 FOR THEM, BUT THEN QUICKLY ROSE, WITHIN THREE YEARS. I
7 WAS THE VICE PRESIDENT OF ENGINEERING FOR SEQUOIA VOTING
8 SYSTEMS. AND THEN, WE HAD ACQUIRED -- WHEN THAT COMPANY
9 GOT ACQUIRED BY DOMINION, I BECAME THE U.S. VICE
10 PRESIDENT OF ENGINEERING FOR DOMINION. AND THEN, I
11 TRANSITIONED INTO THE, YOU KNOW, CHIEF PRODUCT DESIGN
12 AND SECURITY.

13 Q. SO THIS DOMINION, IS THAT A COMPANY? IS THAT A
14 GRANT? WHAT IS THAT?

15 A. THAT IS A COMPANY. DOMINION VOTING SYSTEMS, IT
16 IS A COMPANY THAT DESIGNS, SOLD, AND HAS CONTRACTS FOR
17 THE ENTIRE STATE OF GEORGIA FOR YOUR ELECTION SYSTEM.

18 Q. ELECTION SYSTEM. YOU MEAN THE VOTING MACHINE?

19 A. THE VOTING MACHINES AND THE BACK END, ALL OF THE
20 THINGS THAT ACTUALLY DESIGN THE BALLOTS THAT GIVE
21 CREDIT, AND ALL OF THE TABULATIONS AS WELL.

22 Q. THAT SYSTEM THAT YOU DESCRIBED, IS -- IS THAT THE
23 SYSTEM THAT GEORGIA USED?

24 A. YES, IT IS. YEAH. I BELIEVE THE CONTRACT WAS
25 FINALIZED IN 2019, AND DOMINION IMPLEMENTED THE NEW

1 SYSTEM STARTING WITH THE 2020 PRIMARY IN GEORGIA. AND
2 IT WAS ALL 152 COUNTIES.

3 MR. WAKEFORD: 159. YOU WERE CLOSE.

4 THE WITNESS: I'VE BEEN OUT OF THE BUSINESS
5 FOR A COUPLE OF YEARS NOW.

6 BY MR. WADE:

7 Q. SO -- SO IS THAT THE VOTING MACHINE THAT WAS USED
8 IN GEORGIA IN THE 2020 ELECTION CYCLE?

9 A. BOTH THE PRIMARY AND THE GENERAL.

10 Q. WERE YOU -- DID YOU TAKE A PART IN GETTING THAT
11 CONTRACT SECURED HERE IN GEORGIA?

12 A. YES, I DID. SO I -- I WAS PART OF A -- WOULD SAY
13 A OPEN HOUSE WHERE ALL OF THE ELECTION VENDORS THAT WERE
14 APPLYING FOR THE CONTRACT. I'VE GOTTA BE HONEST WITH
15 YOU, I CAN'T REMEMBER WHAT TOWN IT WAS IN. BUT THAT WAS
16 FOR A LOT OF THE STATE LEGISLATURES, BUT I ACTUALLY
17 PRESENTED OUR EQUIPMENT FOR THAT.

18 AND THE, I -- YOU KNOW, QUOTE, UNQUOTE, CONSULTED
19 WITH THE COMPANY AND WITH SOME OF THE STATE
20 REPRESENTATIVES, AND STATE OFFICIALS DURING CONTRACT
21 NEGOTIATIONS.

22 Q. THIS DOMINION SYSTEM, DID YOU PLAY A PART IN THE
23 DESIGN OF THE SOFTWARE THAT GEORGIA USES FOR THE SYSTEM
24 OR...

25 A. YEAH. I -- I -- I DIDN'T WRITE A SINGLE LINE OF

1 CODE, BUT I WAS, YOU KNOW, A MAJOR PART OF SOME OF THE
2 ARCHITECTURAL DESIGN, SOME OF THE SOFTWARE DESIGN, HOW
3 THE SYSTEM WORKS BECAUSE IT'S A LOT OF DIFFERENT PIECES
4 THAT ALL HAVE TO WORK TOGETHER. SO THAT WAS REALLY ONE
5 OF MY PRIMARY ROLES IN THE COMPANY, WHICH REALLY DOES
6 NOT EVEN HAVE THAT, SORT OF, WHOLE LAYOUT OF HOW TO
7 SHARE INFORMATION EFFECTIVELY AND SECURELY AND THEN, HOW
8 TO INTERFACE WITH VARIOUS STATE SYSTEMS LIKE VOTER ROLES
9 AND THINGS LIKE THAT.

10 Q. HAVE YOU EVER TESTIFIED BEFORE AS AN EXPERT
11 DEALING WITH THE DOMINION SYSTEMS?

12 A. YEAH, MANY TIMES. I HONESTLY COULDN'T GIVE YOU A
13 COUNT, BUT MANY TIMES.

14 Q. A LOT?

15 A. A LOT, YEAH.

16 Q. OKAY.

17 A. FOR THINGS LIKE STATE LEGISLATURES, ALSO IN
18 FEDERAL COURT, AND -- YOU KNOW, ALL THE WAY DOWN TO THE
19 COUNTY LEVEL.

20 Q. DESCRIBE YOUR -- YOUR EMPLOYMENT WITH DOMINION.
21 WHAT WAS THE RELATIONSHIP IN 2020, AND WHAT IS IT NOW?

22 A. YEAH. SO -- YOU KNOW, LIKE I SAID, WHEN IT WAS
23 INITIALLY ACQUIRED, I WAS ACTUALLY A VICE PRESIDENT
24 LEVEL FOR ENGINEERING. I WANTED TO TRANSFER INTO A MORE
25 STRATEGIC ROLE. SO -- YOU KNOW, I -- MY CORE FOCUS WAS

1 REALLY MEETING WITH POTENTIAL CUSTOMERS LIKE THE STATE
2 OF GEORGIA. YOU KNOW, TRYING TO UNDERSTAND WHAT THEIR
3 NEEDS WERE, YOU KNOW, WHETHER OUR SYSTEM NEEDED TO BE
4 ADAPTED TO, YOU KNOW, BETTERING COMMUNITIES NEEDS, YOU
5 KNOW. ELECTIONS ARE REALLY AT STATE AND COUNTY LEVELS.
6 SO EACH STATE IS -- IS UNIQUE IN THAT. SO EVEN THOUGH
7 WE HAVE SIMPLER PRODUCTS IN DIFFERENT STATES, THEY
8 BEHAVE DIFFERENTLY. THEY MAY HAVE TO ADAPT TO DIFFERENT
9 STATE STATUTES AND THINGS LIKE THAT. SO THAT WAS REALLY
10 MY PURPOSE, IS HAVING TO ADAPT OUR SYSTEM AND WHAT NEW
11 PRODUCTS WE COULD ACTUALLY DEVELOP FOR INDIVIDUAL
12 CUSTOMERS.

13 Q. SO YOUR TITLE WAS, YOU SAID, VICE PRESIDENT, OR
14 WAS IT...

15 A. NO. IT WAS ORIGINALLY VICE PRESIDENT AND IT
16 WAS -- IT WAS -- ACTUALLY, I CAN'T REMEMBER THE EXACT
17 TITLE NOW. LIKE I SAID, I HAD TO LEAVE THE COMPANY
18 ABOUT A YEAR AND A HALF AGO. BUT IT WAS CHIEF PRODUCT
19 DESIGNER AND CHIEF OF SECURITY.

20 Q. WHAT'S -- WHAT'S YOUR PROFESSIONAL UNDERSTANDING
21 OF SOFTWARE THAT WAS THAT WAS PROVIDED BY THE MEDIA FOR
22 HERE IN GEORGIA FOR THAT ELECTION?

23 A. CAN YOU BE A LITTLE CLEAR ON THAT?

24 Q. WHAT -- WHAT'S THE SOFTWARE THAT WAS USED? IS
25 THERE A NAME?

1 A. OH, YEAH. YEAH, IT -- IT'S -- THE OVERALL
2 PRODUCT IS CALLED DEMOCRACY SUITE. AND IT'S CALLED A
3 SUITE BECAUSE IT GIVES MANY OF THE -- VARIETY OF MODULES
4 OF THE ELECTION MANAGEMENT SYSTEM, WHICH IS ESSENTIALLY
5 THE BACK END, WHICH, YOU KNOW, DEFINES THE ELECTION AND
6 ACCUMULATES THE VOTES. THERE'S THE IMAGE CAST TEXT,
7 WHICH, I'M GUESSING, A LOT OF YOU ARE FAMILIAR WITH. IF
8 YOU VOTE IN YOUR PRECINCT, WHICH IS THE PARKING DEVICE.
9 IT'S A TABLET THAT YOU, YOU KNOW, ENTER YOUR VOTES, AND
10 THEN IT PRINTS OUT, YOU KNOW, A BALLOT. THEN, YOU TAKE
11 THAT AND GET IT SCANNED THROUGH THE IMAGE CAST PRECINCT.
12 THERE'S ALSO THE IMAGE CAST CENTRAL, WHICH IS A
13 TABULATOR THAT SITS IN THE SPECIAL OFFICE THAT TABULATES
14 INSIDE MAILER VOTES, (UNINTELLIGIBLE), WHICH JUST
15 OVERSEES MILITARY VOTERS. SO IT'S A WHOLE SUITE OF
16 PRODUCTS UNDER THE UMBRELLA OF DEMOCRACY SUITE.

17 Q. SO ANOTHER WITNESS SORT OF GAVE THE JURORS A MINI
18 TUTORIAL IF YOU WILL, ON WHAT HAPPENS WHEN THEY CAST
19 THEIR BALLOTS; LIKE THE STEPS -- THE PHYSICAL STEPS THAT
20 -- THAT OCCUR.

21 CAN YOU GIVE THEM AN INDICATION -- YOU TOUCHED ON
22 IT A LITTLE BIT, BUT CAN YOU GIVE THEM AN INDICATION OF
23 WHAT HAPPENS WITH THE MACHINE WHEN THEY GO IN TO VOTE?
24 WHAT'S GOING ON THERE?

25 A. YEAH. SO I MEAN, THE FIRST THING IS, AT THE

1 CENTRAL OFFICE, THE MACHINE IS -- IS GOING THROUGH THE
2 PROGRAMS. IT'S NOT ACTUAL SOFTWARE THAT'S INSTALLED
3 THAT'S ALREADY BEEN DONE UNDER A SECURE PROCESS, BUT
4 IT'S AN ELECTION DEFINITION THAT'S LOADED ON THE
5 MACHINE.

6 BECAUSE AGAIN, DEPENDING -- EVEN WITH THE ECONOMY
7 DEPENDING ON WHERE YOU LIVE, YOU HAVE DIFFERENT RACES TO
8 LOOK UP. SO THE MACHINE NEEDS TO KNOW WHAT BALLOT TO
9 DISPLAY TO THE VOTER BASED ON WHERE YOU LIVE. SO THAT'S
10 ALL LOADED UP AT THE CENTRAL OFFICE. THEN, THE MACHINE
11 IS SECURED. SO TAMPER AND SEALS ARE APPLIED, AND THE
12 ONLY ACCESS IS PROVIDED THROUGH SMART CARD INTERFACE
13 THAT'S ENCRYPTED. SO THAT ALLOWS, YOU KNOW, FOR THE
14 POLL WORKER AT THE BEGINNING OF THE DAY TO OPEN THE
15 MACHINES. SUFFICIENTLY ALLOWS, THEN VOTERS, BASED ON
16 WHERE THEY LIVE, TO INPUT A CARD THAT BRINGS UP THEIR
17 SPECIFIC BALLOT.

18 YOU MAKE YOUR CHOICES ON THE SCREEN. ONCE YOU
19 VERIFY THOSE CHOICES, YOU HIT PRINT, AND THE BALLOT GETS
20 PRINTED OUT, RIGHT IN THE SAME LOCATION. THAT BALLOT
21 HAS A QR CODE AND THE HUMAN-READABLE TEXT OF THE
22 SELECTIONS THAT YOU HAVE MADE.

23 FROM THERE, YOU TAKE THAT, AND YOU PUT IT IN A
24 SECRECY SLEEVE, I BELIEVE, IN GEORGIA. THEN, IT GOES
25 TO, I THINK, THE IMAGE CAST PRECINCT, AND AGAIN, PUT

1 THAT -- TABULATOR, THEN, READS THAT BALLOT AND
2 ACCUMULATES THE VOTE BASED ON YOUR SELECTIONS.

3 ONCE THAT'S DONE AT THE END OF THE NIGHT, THERE
4 ARE SOME SECURE REMOVABLE MEMORY ELEMENTS IN THERE,
5 AGAIN, BEHIND LOCKED AND SEALED DOORS. THE POLL WORKER
6 SHUTS DOWN THE POLLS, WHICH DOESN'T ALLOW THE MACHINE
7 COUNTING MORE BALLOTS. AND IT PRINTS OUT WHAT'S CALLED
8 A RESULT PICK, AND THEN IT HAS THE TOTALS FOR EACH RACE
9 THAT IS IN THAT PRECINCT.

10 THEY MAY TAKE ONE OF THE REMOVABLE MEMORY
11 ELEMENTS OUT AND PUT THAT WITH ALL OF THE PAPER BALLOTS,
12 WHICH YOU WOULD SECURE WITH A SECURE TRANSFER CASE,
13 AGAIN, LOCKED, AND SEALED. ALL OF THAT THEN GOES DOWN
14 TO THE CENTRAL OFFICE FOR ACCUMULATION BACK INTO THE
15 DATABASE REPORTING.

16 Q. NOW, THAT'S A LOT. AND I'M NOT AN ENGINEER, BUT
17 IT SOUNDS TO ME LIKE, WITH ALL THAT GOING ON WITH THAT
18 MACHINE, THERE'S A LOT OF ROOM FOR ERROR THERE. IS IT
19 VULNERABLE TO HACKING? CAN PEOPLE GET INTO AND
20 MANIPULATE THE INTER-WORKINGS OF THAT MACHINE TO -- TO
21 MAKE VOTES DO WHAT THEY WANT THE VOTES TO DO?

22 A. SO ALL SYSTEMS -- ALL COMPUTER SYSTEMS HAVE WHAT
23 ARE CALLED VULNERABILITIES. BUT ALL SYSTEMS ALSO HAVE
24 WHAT ARE CALLED MITIGATIONS TOO; POLICIES, PROCEDURES, A
25 LOT OF THEM PHYSICAL, SOME OF THEM BUILT INTO THE

1 SOFTWARE, ITSELF, LIKE -- THINGS LIKE ENCRYPTED DATA.

2 SO THE -- THE -- THE ACTUAL VOTE TOTALS THAT ARE
3 ON THE MACHINE, ARE IN ENCRYPTED FORMAT. SO THAT'S WHEN
4 MITIGATION. THE OTHER MITIGATION IS THE ACTUAL PHYSICAL
5 PROCESSES; THE CHAIN OF CUSTODY, YOU KNOW, VERIFYING THE
6 SOFTWARE THAT'S ON THE MACHINE THAT GOES OUT TO THE
7 POLLING PLACED IS THIS CORRECT IN WHAT -- WHAT'S CALLED
8 CERTIFIED, WHICH IS THE OFFICIAL VERSION OF IT. IT'S
9 THINGS LIKE HAVING THE ACTUAL PAPER BALLOTS THAT GO INTO
10 SECURE TRANSFER CASES. THEY'RE IN LOCKED BOXES. IT'S
11 HAVING THE BACKUPS LIKE THE MACHINE TAKES TO SHOW THE
12 TOTALS. AND THEN, FINALLY, THE ULTIMATE MITIGATIONS IS
13 THE AUDIT AND WHAT'S CALLED CANVASSING, WHICH IS DONE AT
14 THE END OF THE ELECTION THAT COMPARES THE ACTUAL TAX
15 RECORDS THAT ARE ON EACH BALLOT TO THE ACTUAL ELECTRONIC
16 RECORD THAT WAS CAST.

17 SO ALL OF THESE MITIGATIONS, YOU KNOW,
18 SIGNIFICANTLY REDUCE ANY POTENTIAL OF THE VARIOUS
19 FACTORS HAVING ANY IMPACT ON THE ELECTION.

20 Q. IS THIS MACHINE CONNECTED TO THE INTERNET?

21 A. THE INDIVIDUAL ICX'S AND ICP'S; IMAGE CAST
22 PRECINCT, IMAGE CAST TEXT, ARE NOT EVER CONNECTED TO THE
23 INTERNET.

24 Q. NOW, WHAT IS THE DIFFERENCE FROM WHAT YOU JUST
25 SAID, AND WHERE ARE THOSE THINGS; ICX, ICT?

1 A. SO ICX IS THE INDIVIDUAL TABLET THAT VOTERS CAST
2 THEIR VOTE ON AND PRINT THEIR PAPER BALLOT. THE IMAGE
3 CAST PRECINCT IS WHAT TABULATES THAT BALLOT. AND THEN
4 IT COMES INTO THE BACK OFFICE, AND IT GOES INTO THE
5 ELECTION MANAGEMENT SYSTEM, EMS. AND THAT IS NEITHER --
6 NONE OF THOSE PRODUCTS ARE CONNECTED TO THE INTERNET.

7 Q. SO THAT THING THAT IS IN MY VOTING PLACE WHEN I
8 GO AND PUT THE CARD IN AND MAKE MY SELECTION AND THE
9 CARD COMES OUT, THAT THING, IS THAT CONNECTED TO THE
10 INTERNET?

11 A. NO.

12 Q. SO I HEARD SOMEONE TALKING ON ONE OF THE NEWS
13 STATIONS, AND THEY SAID THAT THEY SAW A -- A BLUETOOTH
14 INTERNET CONNECTION EMBLEM ON THE COMPUTER SCREEN.

15 WHAT -- WHAT -- WHAT IS THAT? IS THAT A THING?

16 A. SO I -- I -- I DID SEE THAT NEWS REPORTS, AND TO
17 BE HONEST, I -- I CAN'T REALLY SAY ANY DEFINITIVE
18 STATEMENT OF WHAT YOU'RE REFERRING TO BECAUSE THE
19 DETAILS WERE -- WERE SQUASHED.

20 I WILL SAY, THERE IS A PIECE OF EQUIPMENT THAT'S
21 IN THE PRECINCT THAT IS CONNECTED TO THE INTERNET. IT'S
22 NOT A DOMINION PIECE OF EQUIPMENT. IT'S CALLED, HOBA
23 (PH) -- IT'S JOHN HOBA (PH). AND AFTER THE FIRST PIECE
24 OF EQUIPMENT WHEN YOU WALK INTO YOUR PRECINCT, YOU HAVE
25 TO TELL THE POLL WORKER WHERE YOU LIVE, WHAT YOUR NAME

1 IS, AND THEY LOOK IN THE BOOK TO SEE IN THE POLL BOOK TO
2 SEE IF YOU'RE A VALID VOTER, IF YOU'RE REGISTERED, WHERE
3 YOU LISTED TO SEE WHAT BALLOT STYLE TO GIVE YOU, AND
4 MOST IMPORTANTLY, WHETHER YOU ALREADY VOTED IN THE
5 ELECTION OR NOT.

6 SO THAT PIECE OF EQUIPMENT IS CONNECTED TO THE
7 INTERNET. I -- I COULD SPECULATE THAT MAYBE THEY WERE
8 LOOKING AT THE ELECTRONIC POLL BOOK, AND NATURALLY THEY
9 SAW, YOU KNOW, JUST AN ICON, YOU KNOW, BUT I DON'T HAVE
10 ENOUGH DETAILS TO BASED ON THE -- THE NEWS REPORT.

11 Q. NOW, LET ME SAY THIS WAY: THE MACHINE THAT YOU
12 GUYS USE FOR DOMINION THAT YOU PUT IN THE 2020 ELECTION
13 THAT WE ALL VOTED ON, THAT MACHINE, WAS THAT CONNECTED
14 TO THE INTERNET --

15 A. NO.

16 Q. -- THAT HAVE SOME TYPE OF INTERNET CONNECTION
17 SYMBOL ON IT?

18 A. NO, NOT THAT I RECALL.

19 MR. WOOTEN: DOES IT HAVE EVEN THE
20 CAPABILITY TO CONNECT TO A WI-FI NETWORK ON ANY
21 OTHER INTERNET NETWORK?

22 THE WITNESS: I WOULD HAVE TO -- I WOULD
23 HAVE TO DOUBLE-CHECK ON THAT BECAUSE AN EARLY
24 VERSION OF -- OF THE TABLET DID HAVE THE ABILITY TO
25 BE CONNECTED. IT WASN'T UTILIZED, BUT I DON'T

1 BELIEVE THE ONE THAT WE FILTERED HERE IN GEORGIA
2 EVEN HAD A WI-FI -- ESSENTIALLY WI-FI CAPABILITY,
3 BUT I HAVE TO DOUBLE-CHECK ON THAT.

4 Q. ARE YOU FAMILIAR WITH THE -- WITH THE REPORT THAT
5 WAS ISSUED, US CYBER SECURITY AND INFRASTRUCTURE
6 SECURITY AGENCY, DATED JUNE 3R OF 2022? ARE YOU
7 FAMILIAR WITH THAT REPORT?

8 A. I AM FAMILIAR WITH THAT REPORT.

9 Q. THAT REPORT THAT THEY'RE HANDING TO ME NOW,
10 IDENTIFIES VULNERABILITIES --

11 A. YES.

12 Q. -- OR POTENTIAL VULNERABILITIES WITH THAT
13 DOMINION VOTING MACHINE THAT WAS USED HERE IN GEORGIA.
14 HAVE YOU REVIEWED THAT REPORT?

15 A. I HAVE.

16 Q. THE VULNERABILITIES, FIRST OF ALL, THAT WERE
17 MENTIONED IN THAT REPORT, BEFORE WE GET INTO THOSE, HAS
18 THE DOMINION MACHINE THAT WAS USED IN THE 2020 ELECTION
19 BEEN HACKED?

20 A. NO, NOT TO MY KNOWLEDGE.

21 Q. LET'S TALK ABOUT THE VULNERABILITIES.

22 A. OKAY.

23 Q. THE REPORT LISTS I DON'T KNOW HOW MANY --

24 A. FIVE. I THINK IT'S LIKE FIVE.

25 Q. OKAY. CAN YOU JUST GO THROUGH EACH OF THE FIVE

1 AND TELL US ABOUT THE PARTICULAR VULNERABILITY IF IT'S A
2 REAL THING, AND WHY IT'S NOT, IF IT'S NOT?

3 A. SO AGAIN, AS I STATED, ALL SYSTEMS DO HAVE
4 VULNERABILITIES, AND THESE VULNERABILITIES DO EXIST.
5 BUT IN EACH OF THESE, THERE ARE MITIGATIONS THAT AFFECT
6 HOW EXPLOITABLE, OR HOW EASILY ACCESSIBLE THAT -- THAT
7 THEY ARE.

8 SO THEY ALL SORT OF FALL UNDER THE SAME UMBRELLA
9 THAT THEY ARE VULNERABILITIES THAT IF YOU HAD ACCESS TO
10 EACH INDIVIDUAL MACHINE, ALONG WITH KNOWLEDGE OF WHAT
11 THE ENCRYPTION KEYS ARE, UNFETTERED ACCESS, THE ABILITY
12 TO BYPASS ALL OF THE PHYSICAL SECURITY ELEMENTS; THE
13 SEALS, THE LOCKS, THINGS LIKE THAT, IF YOU HAD THAT
14 WHOLE ACCESS AND WHOLE BACK END KNOWLEDGE OF THE
15 INDIVIDUAL ELECTION BECAUSE EACH ELECTION IS DIFFERENT,
16 ALL THE KEYS ARE DIFFERENT, YOU COULD, POTENTIALLY,
17 COMPROMISE THE MACHINE. BUT YOU WOULD HAVE TO DO THAT
18 ON EACH INDIVIDUAL MACHINE UNDETECTED.

19 AND IN ADDITION, AT THE END OF THE DAY, LIKE I
20 SAID, IT'S NOT THE MACHINE THAT COUNTS THE VOTES, IT'S
21 THE PIECE OF PAPER THAT GETS PRINTED OUT AND WITH THE
22 INDIVIDUAL TEST RECORD THAT EVERY VOTER CAN VERIFY THAT
23 MATCHES THEIR SELECTION.

24 SO EVEN IF YOU COULD, ESSENTIALLY, COMPROMISE THE
25 MACHINE, YOU STILL WOULD HAVE TO, SOMEHOW, BE

1 COORDINATED WITH THE VOTER THAT WHEN THEY LOOK AT THEIR
2 BALLOT, AND THEY'RE, LIKE, WELL, IT SAYS YOU ALREADY
3 VOTED FOR SOMEBODY, BUT I DIDN'T, YOU KNOW, THAT A --
4 THAT'S THE ULTIMATE MITIGATION. AND THAT GOES ALL THE
5 WAY BACK AGAIN TO THE AUDITS THAT WERE DONE, YOU KNOW,
6 THE STATEWIDE RECOUNT, HAND COUNT; WHICH WAS DONE HERE
7 IN GEORGIA. EVEN IF YOU COULD EXPLOIT THESE -- EXPLOIT
8 THESE VULNERABILITIES, AGAIN, THERE'S 30 THOUSAND OF
9 THESE MACHINES ACROSS THE STATE, YOU'D HAVE TO
10 COMPROMISE EACH INDIVIDUAL ONE TO REALLY EXPLOIT THESE
11 VULNERABILITIES.

12 SO, YOU KNOW, THE -- THE RISK IS LOW, BUT THE
13 CONSEQUENCES ARE HIGH, WHICH IS WHY THERE -- YOU KNOW,
14 THIS (UNINTELLIGIBLE) ALSO GOES INTO WHAT THAT PERFECT
15 MITIGATIONS ARE TO MAKE SURE THAT EACH INDIVIDUAL COUNTY
16 APPLIES THOSE AND FOLLOWS THOSE TO LOWER THE SUBSTANTIAL
17 RISK OF ANY OF THESE VULNERABILITIES BEING COMPROMISED.

18 Q. AGAIN, HAVE ANY OF THOSE VULNERABILITIES BEEN
19 COMPROMISED WITH THE -- THE -- DURING THE 2020 ELECTION
20 WITH THESE DOMINION MACHINES?

21 A. THERE'S ABSOLUTELY NO EVIDENCE THAT ANY OF THESE
22 VULNERABILITIES WERE EXPLOITED.

23 Q. THERE WAS ANOTHER REPORT CALLED THE ANSWER REPORT
24 OUT OF -- OUT MICHIGAN. ARE YOU FAMILIAR WITH THAT
25 REPORT?

1 A. UNFORTUNATELY, YES.

2 Q. WHAT IS THAT, THE ALLIED SECURITY?

3 A. BASICALLY, THE ALLIED SECURITIES OPERATIONS
4 GROUP.

5 Q. WHY DID YOU SAY, "UNFORTUNATELY, YES?"

6 A. BECAUSE THAT REPORT FROM INSIDE IS SOMEBODY
7 PROBABLY FABRICATING. THERE'S NO ACTUAL EVIDENCE. I'LL
8 GIVE YOU A CONCRETE EXAMPLE. THEY CLAIM THAT THERE'S A
9 CELL MODULE OF THE DEMOCRACIES SUITE SYSTEM, CALLED THE
10 ADJUDICATION MODULE, RIGHT? THAT IS A MODULE THAT
11 ALLOWS A PLAN WITH BUBBLED IN WITH PEN.

12 SO IF YOU HAVE A PAPER BALLOT THAT YOU ACTUALLY
13 FILL IN BUBBLES, LIKE THE SCANTRON WE USED WHEN WE WERE
14 IN HIGH SCHOOL, YOU KNOW, THAT HAS TO BE HOW THE VOTERS
15 IN GEORGIA, IN THE PAST, MAILED IN THE BALLOTS, RIGHT?

16 WHEN A VOTER'S SITTING AT HOME, THEY MAY MAKE A
17 MARK ON THAT BALLOT, AND THEN CHANGE THEIR MIND. AND
18 THERE ARE, ACTUALLY, INSTRUCTIONS THAT SAY IF YOU DO
19 THAT, YOU CAN, ONE, GO DOWN TO YOUR OFFICE AND GET A NEW
20 BALLOT, OR YOU CAN MAKE AN X THROUGH THE WRONG CHOICE
21 YOU MADE, AND MAKE A NEW CHOICE. THAT BALLOT IS WHAT'S
22 CALLED A VOTER INTENT ISSUE, AND IT HAS TO GO TO,
23 ESSENTIALLY -- ESSENTIALLY THE ADJUDICATION MODULE. AND
24 THAT'S AN ADDITIONAL WAY OF SEEING THE BALLOT, SEEING IF
25 THE VOTER MARKED THROUGH 1 OF THOSE CHOICES AND ALLOWED

1 THE SYSTEM TO APPLY THE VOTE FOR WHO THEY ACTUALLY
2 INTENDED TO VOTE FOR.

3 OKAY. THE MAIN PART OF THE INTERIM REPORT SAYS
4 THAT THE -- ALL OF THE LAWS FOR THE ADJUDICATION SYSTEM
5 WERE ERASED, AND THAT WAS PROOF THAT THERE WAS NEFARIOUS
6 ACTIONS GOING ON, AND SOMETIMES IT DOESN'T USE THE
7 ADJUDICATION SYSTEM. THEY DO IT ALL BY HAND.

8 THEY'RE A SMALL COUNTY. SO AS POLL WORKERS IN
9 THE CENTRAL OFFICE TAKE BALLOTS OUT OF THE ENVELOPE,
10 THEY ACTUALLY SCANNED THEM TO SEE IF THERE'S ANY VOTER
11 ATTENDANCE SHEETS. IF THEY ARE, THEY PUT IT INTO A
12 SEPARATE BOX, AND IT GOES TO AN ADJUDICATION BOARD,
13 WHICH IS ACTUALLY FOUR PEOPLE SITTING AROUND THE TABLE,
14 AND THEY REMAKE THE BALLOT.

15 THERE IS NO ADJUDICATION SYSTEM. SO THERE
16 FUNDAMENTAL -- AND THIS IS ONE OF THE HIGHLIGHTS OF THAT
17 WHOLE REPORT THAT THE ADJUDICATION LOGS WERE ERASED
18 BECAUSE THERE -- THERE WAS NO ADJUDICATION SYSTEM IN --
19 THE COUNTY AT ALL.

20 AND THAT'S JUST -- THAT'S JUST ONE OF THAT REPORT
21 THAT'S COMPLETELY FABRICATED.

22 MR. WAKEFORD: SO THE CLAIM IN THE REPORT
23 WAS THAT THEY WERE MISSING CRUCIAL CONTENTS WHEN
24 THAT COUNTY ACTUALLY DOESN'T EVEN USE THAT.

25 THE WITNESS: CORRECT.

1 MR. WAKEFORD: OKAY.

2 BY MR. WADE:

3 Q. YOU DON'T KNOW WHAT THE MOTIVE WOULD HAVE BEEN
4 FOR ALLIED TO PRODUCE SUCH REPORT DO YOU?

5 A. I COULD SPECULATE IT, BUT I DON'T KNOW THOSE
6 INDIVIDUALS PERSONALLY.

7 Q. OKAY.

8 MR. NEY: (UNINTELLIGIBLE) CAN YOU EXPLAIN
9 WHAT A MODULE IS? YOU USE THAT TERM A COUPLE OF
10 TIMES, MODULE OR SUB-MODULE?

11 THE WITNESS: YEAH, SURE. YEAH, YOU KNOW,
12 DEMOCRACY SUITE, IT'S A SUITE OF PRODUCTS. SO WITH
13 A HOME STEREO SYSTEM, BACK IN THE DAY, THEY HAVE
14 THE TURN TABLE, THEY HAVE THE CASSETTE DECK, AND
15 MAYBE A MINI DECK. SO EACH ONE OF THOSE, YOU KNOW,
16 DOES A DIFFERENT FUNCTION.

17 SO MY PC HAS MODULES THAT DO DIFFERENT
18 FUNCTIONS, OKAY? THEY HAVE THE ELECTION MANAGEMENT
19 SYSTEM, WHICH, AGAIN, PRIOR TO THE ELECTION, IT
20 LAYS OUT THE PAPER BALLOTS, IT DEFINES THE DATA
21 THAT GETS FED INTO THE IMAGE CAST, WHICH IS THE
22 TABLET THAT YOU HEARD ABOUT. SO THAT'S THE EMS1
23 MODULE.

24 THE ICS IS A DIFFERENT MODULE. THE
25 IMAGE-CAST PRECINCT JUST SCANS THE BALLOTS. IT'S A

1 DIFFERENT MODULE.

2 THE ADJUDICATION PROCESS IS A DIFFERENT
3 MODULE, ALL PART OF THE SOFTWARE SUITE.

4 MR. WAKEFORD: AND SO, ON THAT PART OF THE
5 POINT, YOU TALKED ABOUT EACH OF THESE MODULES
6 INCLUDING DIFFERENT PRODUCTS. IS THAT SOFTWARE AND
7 HARDWARE, AND, KINDA, WHAT'S THE RELATIONSHIP
8 BETWEEN THE TWO, AND WHAT'S THE MAIN ROLE OF THE
9 SOFTWARE AND THE HARDWARE?

10 THE WITNESS: YEAH, SO -- LIKE THE -- IN
11 EFFECT, THAT'S THE BATTLE. THAT IS SOFTWARE AND
12 HARDWARE. SO THE -- THE ACTUAL TABLET ITSELF, IS A
13 THIRD-PARTY PRODUCT THAT DOMINION PURCHASES. THE
14 SOFTWARE THAT RESIDES ON IT, THAT'S SOFTWARE THAT
15 DOMINION DEVELOPED.

16 THE ELECTION MANAGEMENT SYSTEM, YOU KNOW,
17 THAT -- THAT RESIDES ON COMMON DELL SERVERS. THE
18 SOFTWARE ITSELF IS, TOO, DEVELOPED BY DOMINION.

19 MR. WAKEFORD: AND SO CAN DIFFERENT COUNTIES
20 CHOOSE, YOU KNOW, WE WANT THIS SOFTWARE OR THIS
21 HARDWARE. YOU DON'T WANT THIS SOFTWARE AND THIS
22 HARDWARE. WE DO WANT THIS SOFTWARE.

23 CAN THEY HAVE A PICK WHICH SOFTWARE PRODUCTS
24 THEY NEEDED FOR THEIR ELECTION?

25 THE WITNESS: TO AN EXTENT. SO THE ENTIRE

1 SUITE GETS, QUOTE, CERTIFIED AT A STATE LEVEL,
2 WHICH DETERMINES, YOU KNOW, THE MODEL OF THE
3 SERVER, THE MODEL AND SOFTWARE VERSIONS OF THE
4 SOFTWARE THAT'S ON THERE. AND IT DEPENDS ON THE
5 STATE, WHETHER THEY CAN PICK AND CHOOSE FROM --
6 FROM THAT CERTIFIED LIST.

7 SO LIKE I SAID, IN STANFORD COUNTY, THEY
8 CHOSE NOT TO PURCHASE THE ADJUDICATION MODULE.
9 THEY DIDN'T NEED IT. IT WAS NOT COST-EFFECTIVE FOR
10 THEM. BUT SOMEBODY LIKE DETROIT, A MUCH LARGER
11 COUNTY, THAT HAS MUCH LARGER NEEDS, THEY DECIDED TO
12 PURCHASE THE ADJUDICATION MODULE.

13 BUT EACH PIECE ACROSS A GIVEN STATE IS THE
14 SAME VERSION OF HARDWARE, THE SAME VERSION OF
15 SOFTWARE.

16 BY MR. WADE:

17 Q. SO LET ME ASK YOU BECAUSE I'M A PRACTICAL GUY FOR
18 THIS STUFF TO MAKES SENSE. I HAVE TO SAY IT IN
19 PRACTICAL TERMS. IF I GO TO THE -- THE -- THE VOTING
20 BOOTH, AND THE -- THE CANDIDATES ARE CELL PHONE, WATER.
21 IF I CAST A VOTE FOR WATER, CAN SOMETHING MAGICALLY
22 HAPPEN TO MAKE MY VOTE FOR WATER GO IN FAVOR OF THE CELL
23 PHONE?

24 A. TECHNICALLY, WITH ALL OF -- BYPASSING ALL OF THE
25 MITIGATIONS AND ALL OF THE SECURITY PROTOCOLS THAT ARE

1 ALREADY IN PLACE, IS IT POSSIBLE? GIVEN ENOUGH TIME,
2 ANY SYSTEM IS ABLE TO BE COMPROMISED, AND THAT'S
3 JUST -- THAT'S THE BOTTOM LINE.

4 IS IT PRACTICAL, IN THIS SCENARIO AND WITH ALL
5 THE MITIGATIONS? NO, IT'S NOT PRACTICAL. AND AT THE
6 END OF THE DAY, EVEN IF YOU CHOSE WATER, AND YOUR PAPER
7 BALLOT CAME OUT, AND IT SAID CELLPHONE, NOW, THAT'S THE
8 PART THAT MATTERS. THE ULTIMATE MITIGATION IS THAT YOU
9 WOULD SEE THAT, AND IT'S NOT THE CHOICE THAT YOU MADE.
10 THAT STATE DOESN'T MATTER. IT'S NOT WHAT GOES ON IN THE
11 MACHINE.

12 MR. WAKEFORD: I -- I WANTED TO GET -- I'M
13 GLAD YOU ASKED THAT QUESTION BECAUSE I WANTED TO
14 ASK -- YOU KEEP SAYING IT'S THE PAPER THAT MATTERS.
15 SO YOU USE SOFTWARE, THE TABLET, BUT IN THE END,
16 WHAT IS PRODUCED IS A PAPER -- A PIECE OF PAPER
17 WITH MY VOTING SELECTIONS ON IT?

18 THE WITNESS: ABSOLUTELY. AND THAT IS THE
19 OFFICIAL RECORD. NO -- NO OTHER RECORD IN THE
20 WHOLE PROCESS MATTERS BUT THAT PIECE OF PAPER. AND
21 AGAIN, THAT'S WHY WHEN -- WHEN POTENTIAL QUESTIONS
22 CAME UP WITH GEORGIA, THEY -- THE STATE DID A FULL
23 HAND RECOUNT OF THE PAPER BALLOTS, AND MATCHED THE
24 ELECTRONIC RECORDS.

25 BY MR. WADE:

1 Q. ARE YOU AWARE -- WOE, WAIT. WE GOT OUR FIRST
2 QUESTION HERE.

3 GRAND JUROR: HOW ARE YOU? I -- DID I HEAR
4 YOU SAY THAT ONCE YOU'VE VOTED, THE VOTER COULD THE
5 CHECK TO MAKE SURE THAT THEY PRODUCE WHAT THEY
6 THOUGHT THEY VOTED?

7 (CROSSTALK, GRAND JUROR CONTINUES.)

8 SO IT WAS A VISUAL FOR THE PERSON WHO VOTED
9 TO ACTUALLY SAY THAT THIS IS CORRECT --

10 THE WITNESS: ABSOLUTELY.

11 GRAND JUROR: OKAY. AND -- I MEAN, I DO
12 THAT WITH LIFE. SO IN MY HOME STATE, I LIVE IN
13 COLORADO, YOU KNOW. WE DO ALL -- HANDWRITE
14 BALLOTS. AND EVEN AFTER I FILL IN MY BALLOT, I
15 DOUBLE-CHECK IT BECAUSE, YOU KNOW, SOMETIMES I MARK
16 THE WRONG POLL, RIGHT?

17 SO IN GEORGIA, IN THE PRECINCT, THE LAST
18 STEP IS THE BALLOT GETS PRINTED WITH YOUR
19 SELECTIONS. AND, YES, THE VOTER CAN VERIFY THOSE
20 SELECTIONS BEFORE THE BALLOT IS COUNTED BECAUSE
21 NOTHING'S BEEN COUNTED AT THAT POINT. THE NEXT
22 STEP IS ACTUALLY PUTTING THEM INTO THE TABULATOR.

23 GRAND JUROR: OKAY.

24 MR. WADE: ONE MORE QUESTION. GO AHEAD.

25 GRAND JUROR: THAT WAS PRETTY MUCH MY SAME

1 QUESTION. THE VOTER DOES ACTUALLY SEE THAT PIECE
2 OF PAPER --

3 (CROSSTALK)

4 GRAND JUROR: -- AND THEY HAVE TO TURN IN
5 THAT PIECE OF PAPER.

6 THE WITNESS: BEFORE IT'S COUNTED.

7 GRAND JUROR: YES.

8 THE WITNESS: YES. AND THEN IT GOES INTO
9 THE TABULATOR.

10 GRAND JUROR: YES. SO YOU TAKE OFF THE
11 PRINTER, AND YOU TURN IN THAT PIECE OF PAPER.

12 THE WITNESS: YES.

13 GRAND JUROR: AND THEN IT'S COUNTED. OKAY,
14 YES. SO YOU WOULDN'T BE ABLE TO...

15 THE WITNESS: THAT'S ACTUALLY LISTED AS ONE
16 OF THE MAIN MITIGATIONS IN THE SYSTEM REPORT;
17 ENCOURAGE VOTERS TO VERIFY THE HUMAN READABLE VOTES
18 ON THE GROUND.

19 GRAND JUROR: AND THAT COMPUTER, YOU SAID,
20 HAS A QR CODE ON IT?

21 THE WITNESS: IT DOES HAVE A QR CODE AT THE
22 TOP, BUT THEN IT'S A FULL TEXT RECORD. IT LISTS
23 EACH CONTEST AND THE SELECTION OF THE VOTER.

24 GRAND JUROR: OKAY.

25 MR. WADE: DO WE HAVE ANOTHER ONE IN THE

1 BACK THERE? GO AHEAD.

2 GRAND JUROR: SO IF THE VOTER GETS A
3 PRINTED-OUT BALLOT, AND THEY SEE THIS IS NOT WHAT I
4 SELECTED, WHAT WOULD HAPPEN AT THAT POINT?

5 THE WITNESS: YOU DO IMMEDIATELY TO THE POLL
6 WORKER.

7 GRAND JUROR: AND THEN THE -- I MEAN, WHAT
8 DO THEY DO?

9 THE WITNESS: SO AGAIN, IT -- IT DEPENDS ON
10 THE STATE RULES, AND I DON'T KNOW ALL OF THE
11 PROCESSES. SO YOU WOULD HAVE, ESSENTIALLY, ISSUED
12 A NEW BALLOT. JUST LIKE IF YOU WERE AT HOME AND
13 YOU MIS-MARKED, AND YOU WENT DOWN, AND YOU SAID,
14 HEY, YOU KNOW, I MADE THE WRONG SELECTION. THEY
15 WOULD GIVE YOU A NEW BALLOT. SO THEY WOULD GIVE
16 YOU A NEW CARD. YOU WOULD GO BACK TO THE VOTING
17 DEVICE, YOU KNOW, ICX, AND REMAKE YOUR BALLOT.

18 MR. WADE: LATER THIS MORNING, YOU'LL GET TO
19 ASK THAT QUESTION TO AN ACTUAL POLL WORKER.

20 EXAMINATION

21 BY MR. WAKEFORD:

22 Q. SO GOING BACK, SORT OF, COLLECTING THIS LINE OF
23 -- OF -- OF QUESTIONS, THERE'S BEEN A LOT OF CHATTER IN
24 THE MEDIA -- THE NEWS MEDIA ABOUT VOTES BEING SWITCHED.
25 SO TO UNDERSTAND -- IF I'M -- CORRECT ME IF I'M WRONG,

1 BUT FROM WHAT I UNDERSTAND OF YOUR TESTIMONY, IN ORDER
2 FOR THAT TO TAKE PLACE, FIRST OF ALL, SOMEONE WOULD HAVE
3 TO MANIPULATE EACH MACHINE INDIVIDUALLY?

4 A. CORRECT.

5 Q. CORRECT?

6 A. CORRECT.

7 Q. IS THERE A WAY FOR ME TO HACK INTO ONE MACHINE
8 AND -- AND GET TO ALL OF THEM?

9 A. NOT THAT I'M AWARE OF.

10 Q. NOT THAT YOU'RE AWARE OF.

11 A. IT WOULD BE HIGHLY IMPRACTICAL. AGAIN --

12 Q. I MEAN, I'M SAYING IF THERE'S A PERSON WHO --
13 YOU'RE NOT AWARE OF A WAY TO GET INTO ONE AND THEN ALL
14 THE OTHERS.

15 A. NOT -- NOT WITHOUT INDIVIDUAL ACCESS. SO
16 AGAIN -- AND I'M NOT TRYING TO BE CRAZY ABOUT THIS. YOU
17 CAN'T JUST GET IN ONE AND HAVE, LIKE, A TERMINAL RADIATE
18 ACROSS ALL OF THE OTHER ONES ACROSS THE --

19 Q. OKAY. THAT WAS MY QUESTION.

20 A. ALL RIGHT. IF THERE IS SOME WAY THAT YOU COULD
21 FIGURE OUT A WAY TO HAVE A PIECE OF MEDIA. BUT THEY
22 STILL WOULD HAVE TO BE PHYSICALLY TOUCHING ALL OF THOSE
23 DEVICES. YES, YOU COULD DO THAT, BUT AGAIN, THAT STILL
24 REQUIRES INDIVIDUAL ACCESS BY AN ACTUAL PERSON BYPASSING
25 ALL OF THE SECURITY SEALS AND ALL OF THE OTHER

1 MITIGATIONS.

2 Q. ON EACH INDIVIDUAL MACHINE.

3 A. EACH INDIVIDUAL MACHINE.

4 Q. AND THEN FOR VOTERS TO MISS THAT THEIR PAPER
5 BALLOT WAS INCORRECT?

6 A. THAT IS CORRECT.

7 Q. OKAY.

8 MR. WADE: OKAY. YES, MA'AM, IN THE BACK,
9 AND THEN WE'LL COME BACK TO YOU.

10 GRAND JUROR: I KNOW IT WOULD BE DAUNTING TO
11 TRY TO AFFECT THE DETAILS OF THE MACHINE WHEN THE
12 MARGIN IS SO SMALL, 12 THOUSAND VOTES. WOULD THE
13 PERSON NEED TO ONLY GET INTO ONE?

14 THE WITNESS: NOT NECESSARILY.

15 GRAND JUROR: CAN YOU EXPOUND ON THAT?

16 THE WITNESS: YEAH. IF IT'S -- IF IT'S ONLY
17 ONE DEVICE -- AND AGAIN, YOU WOULD HAVE TO -- WELL,
18 OKAY. SO ONE DEVICE, 12,000 VOTES, PRECINCT, 7
19 MILLION, YOU HAVE 1,000 VOTERS, AND MULTIPLE
20 DEVICES.

21 FOREPERSON: BUT COBB COUNTY IS LIKE FULTON
22 THOUGH. IT'S A HUGE POPULATION.

23 THE WITNESS: RIGHT. BUT -- BUT EACH --
24 EACH PRECINCT HAS A NUMBER OF DEVICES. AND EACH
25 PRECINCT IS ONLY LIMITED TO ABOUT 1,000 VOTERS. SO

1 THAT'S WHY FULTON COUNTY CAME OUT WITH 1,000
2 PRECINCTS.

3 ALL RIGHT. SO COMPROMISING ONE MACHINE --
4 AND AGAIN, YOU WOULD HAVE TO HOPE THAT NO VOTER ON
5 THAT MACHINE -- SO LET'S SAY, THERE'S 1,000 PEOPLE
6 IN THE PRECINCT AND THERE'S FIVE MACHINES, ALL
7 RIGHT? SO THAT'S ROUGHLY, 200 VOTERS PER MACHINE.
8 YOU HAVE TO RELY ON THOSE 200 VOTERS ON THAT ONE
9 MACHINE NOT NOTICING THAT THEIR BALLOT HAS PRINTED
10 OUT THE WRONG RECORD. THAT'S HIGHLY UNLIKELY. IS
11 IT POSSIBLE? AGAIN, IN THE REALM OF POSSIBILITIES,
12 YES, IT'S POSSIBLE. IS THERE ANY EVIDENCE OF THAT
13 EVER HAPPENING, NO, WHICH IS WHY, AGAIN, THE TEXT
14 RECORD IS THE OFFICIAL BALLOT RECORD. THAT'S WHY
15 THERE ARE AUDITS -- POST-ELECTION AUDITS THAT
16 VERIFY THE ACTUAL -- YOU KNOW, THEY DO
17 RISK-LIMITING AUDITS, WHICH IS A RANDOM SAMPLING OF
18 BALLOTS THAT IS DEPENDANT UPON THE ACTUAL
19 DIFFERENCE IN THE RACE. SO THE CLOSER THE RACE,
20 THE MORE BALLOTS YOU LOOK AT IF THAT MAKES SENSE,
21 ALL RIGHT? BECAUSE THE MARGINS ARE LOW, ALL RIGHT?

22 SO YOU HAVE THOSE AUDITS. AND IF THERE'S
23 ANY QUESTIONS IN THOSE AUDITS, THEN YOU DO A FULL
24 HAND RECOUNT, WHICH YOU ALREADY DID. AND THE PAPER
25 BALLOTS MATCHED THE REPORTED ELECTRONIC RECORDS.

1 BY MR. WADE:

2 Q. SO -- SO YOU TOUCHED ON MY NEXT POINT -- OR MY
3 NEXT QUESTION. HAS THERE BEEN, TO YOUR KNOWLEDGE, AN
4 INSTANT OF THE TYPE OF COMPROMISE THAT MR. WAKEFORD JUST
5 DESCRIBED? HAVE YOU EVER HEARD OF THAT HAPPENING?

6 A. THERE'S NO EVIDENCE OF ANY VENDOR'S MACHINES EVER
7 BEING COMPROMISED IN THE FIELD.

8 Q. ALL RIGHT.

9 MR. WADE: YES, SIR?

10 EXAMINATION

11 BY MR. WAKEFORD:

12 Q. YOU MENTIONED THE PAPER BALLOT HAS A
13 DESCRIPTION -- NORMAL READING STATUS?

14 A. YES.

15 Q. AND, ALSO, THE QR CODE?

16 A. YES.

17 Q. WHEN THE TIME VENDOR READS THE BALLOT, DOES IT
18 READ THE QR CODES, OR DOES IT READ THE -- THE TEXT?

19 A. IT ACTUALLY READS BOTH. SO IT TAKES A -- A
20 DIGITAL IMAGE. IT DOES USE THOSE QR CODE AS AN
21 EFFICIENT WAY OF TABULATING THE VOTE, BUT YOU CAN
22 COMPARE, AND THE SYSTEM INCLUDES BOTH OF THOSE RECORDS
23 IN COMPARISON.

24 AND, AGAIN, BY STATE LAW, IT'S THE TEXT RECORD
25 THAT IS THE OFFICIAL VOTE.

1 Q. I JUST WAS CURIOUS IF THEY'RE TINKERING WITH
2 STUFF MAKES THE QR CODE SAY ONE THING, BUT THE TEXT SAY
3 SOMETHING DIFFERENT, WAS WHERE I WAS GOING.

4 A. THAT IS A -- THAT IS A VULNERABILITY, BUT THERE
5 ARE MITIGATIONS FOR THOSE THAT HAVE TO DO WITH, AGAIN,
6 THAT QR CODE HAS ENCRYPTED DATA THAT MATCHES THE -- YOU
7 KNOW, THE TEXT DATA AND THOSE COMPARISONS ARE DONE.

8 MR. WADE: YES, MA'AM?

9 GRAND JUROR: IS THE TESTING BEFORE, YOU
10 KNOW HARDWARE, SOFTWARE DELIVERED TO THE CLIENT
11 VERIFY THAT THERE IS, BASICALLY, A PERFECT RESULT
12 EVERY TIME. FOR EXAMPLE, IF YOU WERE TO GO IN AND
13 VOTE, IS THERE TESTING TO MAKE SURE THAT THE
14 PRINTOUT IS ACCURATE?

15 MR. WADE: I THINK YOU'RE READING MY NOTES.

16 (CROSSTALK)

17 GRAND JUROR: CAN YOU TALK ABOUT HOW THAT
18 TESTING DONE?

19 THE WITNESS: YEAH. SO IT'S DONE, ACTUALLY,
20 AT MULTIPLE LEVELS. SO. THERE'S -- THERE THE
21 ELECTION SYSTEMS COMMISSION, EAC, HAS WHAT ARE
22 CALLED VOLUNTARY VOTING SYSTEM GUIDELINES. AND
23 THAT LAYS OUT A WHOLE SET OF REQUIREMENTS THAT
24 VOTING SYSTEMS NEED TO MEET IF YOU WANT TO BE
25 CERTIFIED UNDER THE EAC GUIDELINES.

1 MR. WAKEFORD: IS THAT A NATIONWIDE
2 ORGANIZATION?

3 THE WITNESS: SO THE EAC IS A FEDERAL -- I
4 DON'T KNOW, OFFICE COMMISSION, BUT STATES RUN
5 VOTING SYSTEMS. SO THE FEDERAL GOVERNMENT ACTUALLY
6 HAS NO AUTHORITY OVER STATE VOTING -- VOTING AT
7 ALL. SO THAT'S WHY THEY'RE CALLED VOLUNTARY VOTING
8 SYSTEM GUIDELINES. BUT STATES CAN ADOPT THOSE
9 GUIDELINES, AND GEORGIA DOES.

10 GEORGIA ALSO DOES ITS OWN TESTING ON TOP OF
11 THE VVS (PH) VOTING -- VOLUNTARY VOTING GUIDELINES.
12 WITHIN THAT VVS (PH) FEED, THERE ARE SPECIFIC
13 TESTING REQUIREMENTS FOR ACCURACY. AND IT'S --
14 AGAIN, IT'S BEEN A WHILE, BUT IT'S SOMETHING LIKE 1
15 IN 400 MILLION.

16 SO IT'S -- SO -- THEY RUN TESTS OF 400
17 MILLION VOTES, AND IF YOU HAVE ONE SINGLE FAILURE
18 IN THAT BEFORE YOU GET TO 400 MILLION, YOU CAN'T
19 GET CERTIFIED, OKAY?

20 ON TOP OF THAT, GEORGIA HAS THEIR OWN
21 TESTING REQUIREMENTS AND THEY HAVE ACCURACY
22 INVOLVED IN THAT. BEFORE EVERY ELECTION, THERE'S
23 SOMETHING CALLED LOGIC INACCURACY TESTING.
24 ACTUALLY, IT'S CALLED PRE-LOGIC INACCURACY TESTING
25 FOR BEFORE THE ELECTION. AND THEN THERE'S

1 POST-LOGIC INACCURACY TESTING. EACH INDIVIDUAL
2 COUNTY TEST EVERY PIECE OF EQUIPMENT ON ALL BALLOT
3 FILES AND ALL SELECTIONS THAT THE EQUIPMENT IS
4 ACTUALLY PRODUCING THE PROPER CORRECT RECORD. THEY
5 DO THAT BEFORE THE ELECTION. SOME STATES TO
6 PARALLEL TESTING ON ELECTION DAY WHERE THEY'LL
7 TAKE -- I DON'T KNOW IF GEORGIA DOES THIS, BUT
8 THEY'LL TAKE RANDOM MACHINES OUT OF THE FIELD AND
9 THEY'LL VOTE THEM OUTSIDE OF ACTUAL OFFICIAL VOTING
10 TO MAKE SURE THAT THOSE MACHINES ARE BEHAVING
11 PROPERLY. AND THEN, ALL OF THE MACHINES ARE
12 RE-VERIFIED AFTER THE ELECTION THAT THERE BEHAVING
13 PROPERLY.

14 SO, AGAIN, BACK TO YOUR POINT, DO YOU THINK
15 YOU COULD COMPROMISE THAT ONE MACHINE, YOU KNOW,
16 WHAT YOU'D HAVE TO COMPROMISE IT AFTER THE
17 PRE-LOGIC, AND THEN, SOMEHOW, GET IT BACK INTO ITS
18 STATE BEFORE THE POST-LOGIC, TO BE UNDETECTED.

19 MR. WOOTEN: CAN YOU KINDA WALK US
20 THROUGH --

21 MR. WADE: HANG ON. HANG ON ONE SECOND, MR.
22 WOOTEN.

23 SIR, DID YOU HAVE A QUESTION? OKAY. THERE
24 IT IS.

25 GRAND JUROR: I HAVE FOR QUESTION REGARDING

1 THE ABSENTEE BALLOTS. CAN YOU EXPLAIN HOW THE
2 ABSENTEE BALLOT PROCESS WORKS BECAUSE THERE IS NO
3 PHYSICAL PRESENCE OF THE VOTING IN THIS CASE?

4 THE WITNESS: YEAH. I MEAN, ABSENTEE VOTING
5 IS SIMPLY A VOTER GETS THEIR BALLOT IN THE MAIL.
6 AND, AGAIN, A BALLOT HAS HOLES THAT YOU CAN FILL IN
7 TO REGISTER YOUR -- THE INDIVIDUAL CHOICES. VOTERS
8 THEN PUT THAT INTO A SECRECY SLEEVE AND PUT THAT
9 INTO A SECURE ENVELOPE. IT'S SIGNED. THEY MAIL IT
10 BACK TO THE CENTRAL OFFICE.

11 AGAIN IT'S STATE LAW AND COUNTY STATUTES, OR
12 THINGS LIKE THAT, BY HOW THEY PROCESS THOSE BALLOTS
13 TO VERIFY THOSE SIGNATURES AGAINST THE OFFICIAL
14 REGISTRATION RECORD. ONCE THOSE ARE VERIFIED, THE
15 BALLOTS ARE MOVED TO THE SECRECY ENVELOPE SO THAT
16 YOU DON'T INVALIDATE VOTER SECRECY.

17 THE BALLOTS ARE THEN UNFOLDED AND THEN FED
18 INTO A CENTRAL SCANNING UNIT CALLED THE IMAGE CAST
19 CENTRAL, IN THE SECURE ELECTIONS OFFICE, AND THOSE
20 TOTALS ARE ADDED TO THE ELECTION DAY TOTALS. DID I
21 COVER WHAT YOU WERE LOOKING FOR?

22 GRAND JUROR: AND THEY SCANNED IN THE SYSTEM
23 BY A SECOND PERSON?

24 THE WITNESS: YEAH, AN ELECTION -- A POLL
25 WORKER, YEAH.

1 BY MR. WADE:

2 Q. SO I THINK YOU -- WHAT WOULD BE HAPPENING, THAT
3 SCANNER, IS THAT A DOMINION PRODUCT?

4 A. IT'S -- IT'S ACTUALLY A -- IT'S A CANON SCANNER,
5 AND IT'S HOOKED UP TO A COMPUTER THAT HAS OUR SOFTWARE
6 FOR ANALYZING OUR SOFTWARE -- AN INDUSTRY SOFTWARE. AND
7 THAT'S DONE BY COUNTY OFFICIALS.

8 FOREPERSON: I FEEL LIKE YOU'RE IGNORING ME.

9 MR. WADE: OH, NO, NO, NO. I'LL GET YOU
10 NEXT.

11 FOREPERSON: WHEN IT COMES TO THE HARDWARE
12 FOR -- FOR ALL THIS, YOU SAID THAT SOME ARE
13 CONNECTED TO THE INTERNET, RIGHT, AND THE SOFTWARE
14 IS INSTALLED BEFOREHAND. AND YOU SAID THAT -- THAT
15 CURRENT ELECTION IS LOADED IN AT THE CENTRAL
16 OFFICE. SO LIKE WHETHER IT'S, YOU KNOW, TRUMP
17 VERSUS BIDEN, OR WHATEVER, THAT'S LOADED IN THE
18 CENTRAL OFFICE. IS THAT -- THAT'S LOADED IN ON
19 EACH INDIVIDUAL ICX?

20 THE WITNESS: YES, THE ELECTION DEFINITION
21 IS LOADED ON EACH INDIVIDUAL ICX.

22 FOREPERSON: AT THE OFFICE.

23 THE WITNESS: AT THE OFFICE.

24 FOREPERSON: AND THEN, THEY'RE SEALED.

25 THE WITNESS: THEY'RE TESTED, AND THEN

1 THEY'RE SEALED.

2 FOREPERSON: OKAY -- OKAY. SO LIKE, LET'S
3 SAY JUST TO -- TO HELP ILLUSTRATE, LIKE, QUESTION
4 HERE, LIKE, LET'S SAY THEY ALL WENT OUT AND THEY
5 FOUND OUT THAT THE ELECTION WASN'T GOING TO BE
6 TRUMP/BIDEN, IT WAS TRUMP/WADE.

7 THE WITNESS: THAT DOES HAPPEN.

8 FOREPERSON: WOULD YOU HAVE TO RECALL EACH
9 MACHINE THEN IF THERE'S NO WAY FOR THEM TO
10 COMMUNICATE?

11 THE WITNESS: THAT'S CORRECT, AND THAT
12 HAPPENS.

13 FOREPERSON: OKAY. SO YOU WOULD HAVE TO,
14 THEN, LITERALLY RECALL EVERY SINGLE ONE OF THOSE
15 MACHINES, CLEAR THEM ALL OUT.

16 THE WITNESS: YEP.

17 FOREPERSON: REPROGRAM. OKAY.

18 THE WITNESS: AND YOU HAVE TO REPRINT ALL OF
19 THE MAIL-IN BALLOTS.

20 FOREPERSON: RIGHT. SO YOU CAN'T JUST BE,
21 LIKE, OH, LET ME FIX THAT NAME TO BE THIS ONE
22 INSTEAD, AND YOU JUST SEND THAT MESSAGE OUT.
23 THERE'S NO WAY.

24 THE WITNESS: NO. AND THAT'S -- THAT'S ONE
25 OF THE MOST DIFFICULT PARTS OF RUNNING AN ELECTION

1 BECAUSE CANDIDATES DO CHANGE, THERE'S COURT
2 CHALLENGES, SEPARATE, RARELY AT THE NATIONAL LEVEL,
3 BUT LOCAL SCHOOL BOARDS, THINGS LIKE THAT, THERE
4 ARE ALWAYS CHANGES. SO THAT'S -- THAT'S THE
5 HARDEST PART BECAUSE YOU HAVE TO REDO EVERYTHING.
6 EVERYTHING HAS TO COME BACK. EVERYTHING HAS TO BE
7 RE -- YOU KNOW, THE NEW DEFINITION HAS TO BE
8 LEVERED. EVERYTHING HAS TO BE RETESTED BEFORE IT'S
9 SET BACK UP.

10 FOREPERSON: MY ONLY OTHER QUESTION IS, I
11 KNOW THAT THERE ARE DEVICES THAT, LIKE, PEOPLE USE
12 TO -- OKAY. I DON'T KNOW WHAT THEY ACTUALLY ARE,
13 BUT THEY SAY PEOPLE USE TO TAKE, LIKE, YOUR CREDIT
14 CARD, OR CONNECT TO AN ATM MACHINE RIGHT WHEN YOU
15 WALK UP TO IT. YOU KNOW WHAT I MEAN? A DEVICE
16 THAT'LL MESSAGE THE MACHINE RIGHT WHEN YOU'RE NEAR
17 IT, AND THEN WALK AWAY.

18 THE WITNESS: YEAH, THAT SYSTEM IS ACTUALLY
19 BROADCASTING DATA.

20 FOREPERSON: OKAY. SO THAT WOULD NOT
21 WORK --

22 THE WITNESS: CORRECT.

23 FOREPERSON: -- ON THIS KIND OF MACHINE?

24 THE WITNESS: YEAH. IT DOESN'T -- IT
25 DOESN'T BROADCAST ANY DATA. IT DOESN'T HAVE

1 BLUETOOTH. IT DOESN'T HAVE WHAT'S CALLED NFC,
2 WHICH IS NEAR FIELD COMMUNICATIONS. SO WHAT -- YOU
3 KNOW, WHAT YOU'RE TALKING ABOUT, ESPECIALLY, LIKE
4 SCANNING PASSPORT IS A BIG ONE --

5 FOREPERSON: YEAH.

6 THE WITNESS: RIGHT? WHERE, YOU KNOW,
7 IT'S -- THEY HAVE WHAT'S CALLED IFRT CHIP IN THEM,
8 AND THAT, IT'S, SORT OF, LIKE BROADCASTING PASSIVE
9 DATA OUT THERE. AND, YEAH, YOU CAN HAVE A SCANNER
10 THAT'S OUT THERE READING THAT, BUT ICX, ICT, THEY
11 DON'T BROADCAST ANY INFORMATION ON -- ON ANY OF
12 THOSE COMMUNICATIONS.

13 FOREPERSON: THAN YOU.

14 MR. WADE: LET'S NOT GLOSS OVER THE FACT
15 THAT -- FOR THE RECORD THAT THE JUROR SAID THAT I
16 WAS QUALIFIED TO RUN FOR PRESIDENT, AND THAT I
17 SHOULD RUN FOR PRESIDENT. AND IS THERE ANYTHING
18 ELSE? THAT WAS GREAT.

19 FOREPERSON: THAT YOU'RE AN EXCELLENT
20 CHOICE?

21 MR. WADE: YES.

22 FOREPERSON: AND THAT YOU'RE ENTITLED TO IT.

23 MR. WADE: THERE YOU ARE.

24 THE WITNESS: I THINK THIS IS A FREE COMEDY
25 SHOW. IF I KNEW, I WOULD'VE COME SOONER.

1 MR. WAKEFORD: SO YOU TESTIFIED THAT, YOU
2 KNOW, THE VULNERABILITIES THAT HAVE BEEN IDENTIFIED
3 REQUIRE PHYSICAL ACCESS TO THESE MACHINES FOR THE
4 UNFETTERED PHYSICAL ACCESS, AND THEY'RE, KIND OF,
5 SOME TAMPER EVIDENCE SYSTEMS IN PLACE THAT WOULD
6 SHOW IF SOMEBODY WAS ABLE TO ACCESS THESE MACHINES
7 IN THAT WAY.

8 CAN YOU EXPLAIN TO THE GRAND JURY EXACTLY
9 WHAT THOSE, KIND OF, PHYSICAL SAFETY MEASURES ARE,
10 AND IF SOMEBODY WERE ABLE TO BREACH THEM, HOW WOULD
11 THAT BE DETECTABLE?

12 THE WITNESS: YEAH. SO IN -- IN -- I'LL
13 ANSWER THAT SPECIFIC QUESTION. IT'S NOT JUST THE
14 PHYSICAL ACCESS OF BEING ABLE TO COMPROMISE THE
15 SEALS, YOU ALSO HAVE TO HAVE INTIMATE BACK-END
16 ENCRYPTED INFORMATION TO EXPLOIT THAT AS WELL.

17 SO THE PHYSICAL THINGS ARE LIKE TEMPER
18 EVIDENCE SEALS. THOSE CAN TAKE MANY FORMS. SOME
19 OF THEM -- I DON'T KNOW IF YOU REMEMBER THE OLD VHS
20 TAPES, THEY HAVE THE LITTLE WOODED SEAL ON THEM,
21 AND THE, SORT OF, ALUMINUM TAPE, YOU KNOW. AND
22 THAT WAS TO PREVENT PEOPLE FROM OPENING THE CASE
23 AND TAKING OFF THE REELS, YOU KNOW.

24 SO YOU ALSO HAVE, ESSENTIALLY, WHAT LOOKED
25 LIKE ZIP TIES, AND THESE ARE SERIALIZED, ALL RIGHT?

1 THEY HAVE SERIAL NUMBERS, AND THE BEST PRACTICE IS,
2 YOU KNOW, AGAIN, IN THE CENTRAL OFFICE BEFORE YOU
3 SEND THE MACHINE OUT, EACH DEVICE ON EACH SEAL HAS
4 THE SERIAL NUMBER, AND THE DEVICE, ITSELF, HAS THE
5 SERIAL NUMBER, AND YOU WRITE THOSE DOWN. AND WHEN
6 THE MACHINE COMES BACK, YOU MAKE SURE THAT THOSE
7 SERIAL NUMBERS HAVE NOT CHANGED.

8 SO -- AND THEN, YOU KNOW, ALL THE WAY DOWN
9 TO THE ACTUAL LOCKS, THE BALLOT BOX, ITSELF, HAS,
10 YOU KNOW, A KEYED LOCK ON IT, AND THEN A TAMPER
11 EVIDENCE SEAL TO LOCK ITSELF.

12 SO THERE'S A VARIETY OF PHYSICAL SECURITY
13 MITIGATIONS; LOCKS, SEALS, TAPE, THAT ARE APPLIED
14 THAT WOULD HAVE TO BE COMPROMISED.

15 AND, AGAIN, BACK TO THE REAL MAIN POINT IS,
16 YOU WOULD HAVE TO HAVE INTIMATE KNOWLEDGE THAT
17 CHANGES EVERY ELECTION ON EVERY DEVICE TO
18 COMPROMISE THE DATA ONCE YOU ACTUALLY GAINED THE
19 ACCESS.

20 GRAND JUROR: WHERE ARE THEY IF APPLIED,
21 LIKE, IN A PROCESS? BEFORE THEY COME TO GEORGIA OR
22 IS EVERYONE...

23 THE WITNESS: NO, NO, NO -- AND THEN, THAT
24 POLL WORKER BETTER BE ABLE TO TELL YOU THAT. BUT
25 IN GENERAL, IT'S -- IN THE END OFFICE, THERE ARE A

1 BUNCH OF CHECKS THAT ARE DONE, RIGHT? TO MAKE SURE
2 THAT THE ACTUAL SOFTWARE ON THE MACHINE IS THE
3 CORRECT SOFTWARE. IT'S WHAT IS CALLED A HASH
4 VALUE. IT'S BASICALLY A SIGNATURE OF THE SOFTWARE.
5 YOU VALIDATE THAT. THEN, YOU HAVE TO GO LOAD THE
6 ELECTION, AND THEN YOU CAN EITHER -- DEPENDING ON
7 HOW IT'S SET UP, YOU CAN EITHER APPLY THE SEALS
8 THERE BEFORE TESTING, OR YOU CAN TEST IT AND THEN
9 SEAL IT ONCE IT'S BEEN VALIDATED.

10 BUT IT'S IN THE CENTRAL OFFICE IN A SECURE
11 LOCATION BEFORE IT'S DELIVERED TO AN INDIVIDUAL
12 PRECINCT.

13 GRAND JUROR: OKAY. THEN IT GOES BACK TO
14 THE CENTRAL OFFICE, BUT THE SEAL IS STILL ON IT.

15 THE WITNESS: YES, SIR. YEAH, AND THEY
16 VALIDATE THOSE SEALS WHEN IT COMES IN.

17 MR. WADE: YES, MA'AM?

18 FOREPERSON: I JUST -- WELL, NOW I WANT TO
19 KNOW, IS THAT CENTRAL OFFICE REPORTING TO WHICHEVER
20 STATE THE ELECTION'S TAKING PLACE IN?

21 THE WITNESS: IT DEPENDS. SO IN GEORGIA,
22 IT'S AT THE COUNTY LEVEL.

23 FOREPERSON: OKAY. COOL. AND THEN, CAN YOU
24 TELL ME WHAT YOU MEAN BY BACK END?

25 THE WITNESS: THAT'S THE CENTRAL OFFICE

1 SERVER.

2 FOREPERSON: OKAY.

3 THE WITNESS: THAT'S WHERE ALL OF THE DATA
4 IS ACCUMULATED.

5 FOREPERSON: OKAY. SO WHEN THE CODES
6 ACCEPT --

7 THE WITNESS: IT'S DATABASE REALLY. WHEN I
8 SAY BACK END, I MOSTLY MEAN THE DATABASE. THAT'S
9 WHERE -- WHEN ALL THE DATA COMES BACK IN WHEN ALL
10 THE DATA'S CREATED FOR, LIKE, THE BALLOT IMAGES, IT
11 LIVES ON A SERVER AND A DATABASE.

12 IT'S THE PART THAT, YOU KNOW, THE PUBLIC
13 NEVER SEES.

14 BY MR. WADE:

15 Q. HAVE YOU EVER BEEN ACCUSED OF USING YOUR POSITION
16 AT THE MEDIA TO INFLUENCE THE OUTCOME OF THE ELECTION?

17 A. I HAVE BEEN ACCUSED A LOT.

18 Q. TELL US ABOUT THE ACCUSATIONS; WHERE THEY CAME
19 FROM, WHETHER THEY WERE LISTED ANYWHERE?

20 A. HOW MUCH TIME DO WE HAVE? STARTING ON OR AROUND
21 NOVEMBER 9TH, I THINK THAT WAS THE FIRST TIME AFTER THE
22 2021 ELECTION, ON NOVEMBER 3RD, THERE WAS A FAR-RIGHT
23 PODCASTER OUT OF COLORADO SPRINGS, COLORADO THAT HAS POD
24 CASTING. HE WENT ON THERE AND ACCUSED ME OF RIGGING THE
25 ELECTION.

1 SO FROM THERE, I GET ACCUSED ON, PRETTY MUCH, A
2 DAILY BASIS. I HAVE RECEIVED A FEW THOUSAND DEATH
3 THREATS IN THE LAST 18 MONTHS. I'VE HAD PEOPLE COME TO
4 MY HOUSE, LETTERS.

5 Q. I'M GOING TO ASK YOU, DID YOU RIG THE ELECTION
6 CAMPAIGN?

7 A. NO, I DIDN'T, AND NOR WOULD I EVEN BEEN ABLE TO.

8 Q. WHAT DOES THAT MEAN? I'M NOT ABLE TO...

9 A. I DON'T HAVE THE ACCESS. I DON'T HAVE THE
10 ABILITY TO EXPLAIN ANY OF THESE VULNERABILITIES. AND
11 IT'S NOT ME -- I MEAN, COUNTIES, STATES RUN ELECTIONS.
12 DOMINION JUST BUILDS THE HARDWARE AND PROVIDE THE
13 SOFTWARE. WE DO NOT RUN ELECTIONS. SO I DON'T HAVE --
14 AND NOR DO I HAVE EVEN THE TECHNICAL CAPABILITY TO BE
15 ABLE TO, YOU KNOW, COMPROMISE ALL OF THE SECURITY AND
16 PROCESSES THAT ARE IN PLACE THAT WOULD BE NEEDED TO
17 AFFECT AN ELECTION.

18 Q. SO LET'S SEE. WHERE DO YOU LIVE?

19 A. I LIVE IN A SMALL TOWN IN COLORADO.

20 Q. HAVE YOU HAD TO RELOCATE AS A RESULT THE --

21 A. I HAD TO RELOCATE FOR ABOUT SIX MONTHS, IN --
22 STARTING IN NOVEMBER OF 2020. I'M BACK IN MY HOUSE NOW,
23 BUT I -- I HAVE, YOU KNOW, A SECURITY SYSTEM AND OTHER
24 MEANS OF SELF-PROTECTION. BUT I DO HAVE TO CHANGE MY
25 DAILY ROUTINE. I DON'T -- I DON'T STICK TO THE SAME

1 ROUTINES ON A DAILY BASIS. AND JUST ON FRIDAY, I
2 BELIEVE, AN EX-WHITE HOUSE STAFFER POSTED A PICTURE OF
3 MY HOUSE AND MY ADDRESS, AND TOLD PATRIOTS TO SHOW UP
4 THERE.

5 Q. IS THAT WHAT -- WHAT'S THERE ON THE SCREEN?

6 A. YEAH.

7 Q. WHAT -- WHAT DID THE PICTURE -- SO WHAT DID
8 THE -- WHAT ID THE PICTURE DO? WHAT DID THE -- YOU SAID
9 EXPERT, I'M SORRY.

10 A. NO, NO. HE'S -- HE'S AN EX-WHITE HOUSE STAFFER.
11 HIS NAME IS JARED KIEFER. HE WORKED FOR PETER NAVARRO,
12 THE SECRETARY OF TREASURY -- TREASURY SECRETARY.

13 HE -- HE -- MR. KIEFER HAS BEEN ONE OF THE MAIN
14 VOICES OF, QUOTE, UNQUOTE, ELECTION FRAUD IN 2020. HE
15 IS THE ONE THAT GRANTED ACCESS TO THE WHITE HOUSE FOR
16 MICHAEL FLYNN (PH), SYDNEY COWL (PH), AND PATRICK BYRNE
17 (PH), WHERE THEY DISCUSSED ON HOW TO OVERTURN ELECTION
18 RESULTS. HE WAS THE ONE THAT -- THAT LED THEM INTO THE
19 WHITEHOUSE. HE HAD HIS -- HIS ACCESS PRIVILEGES REVOKED
20 AT THAT POINT BECAUSE HE VIOLATED ALL SORTS OF
21 PROCEDURES.

22 Q. HOW -- HOW -- HOW DO YOU KNOW THAT HE DID THAT?
23 THAT HE POSTED THAT?

24 A. HIS NAME IS RIGHT AT THE TOP.

25 Q. HOW DO YOU KNOW?

1 A. THAT'S HIS TELEGRAM ACCOUNT.

2 Q. OKAY.

3 GRAND JUROR: TELEGRAM?

4 THE WITNESS: TELEGRAM. IT'S THE -- SORT OF
5 THE GREATLY VERSION OF TWITTER.

6 GRAND JUROR: OH.

7 BY MR. WADE:

8 Q. YOU TALKED ABOUT WHAT -- WHAT --

9 A. OH, JUST HE CALLED ME AN ULTIMATE COMMUNIST.
10 AND, AGAIN, YOU CAN SEE THAT'S MY ADDRESS RIGHT THERE
11 (INDICATING) ON THE BOTTOM. ALL PEOPLE WITH GOODWILL
12 SHOULD BE PICKETING.

13 Q. AND AS A RESULT OF THAT, WHAT HAPPENED? DID
14 PEOPLE SHOW UP AND DO THAT?

15 A. NOT YET. BUT I STAYED AT A FRIEND'S HOUSE FOR A
16 COUPLE OF DAYS, SO.

17 Q. WHEN WAS THAT RELEASED?

18 A. I BELIEVE IT WAS FRIDAY -- THIS PAST FRIDAY.

19 Q. SO THAT'S THE MOST RECENT?

20 A. NO. I'VE GOTTEN ABOUT -- AFTER HE POSTED THIS --
21 AFTER HE EVER POSTED ANYTHING ABOUT ME, I THEN GET
22 VARIOUS TEXTS, AND EMAILS, AND VOICE MAILS OF OTHER
23 PEOPLE THREATENING ME.

24 Q. OKAY.

25 A. SO THAT'S NOT THE MOST RECENT.

1 Q. YOU TALKED ABOUT LETTERS THAT YOU -- THAT YOU
2 GOT. IS THAT ONE OF THE LETTERS THAT MR. WOOTEN IS
3 ABOUT TO --

4 MR. WOOTEN: I HAVE ONE QUESTION BEFORE YOU
5 MOVE ON.

6 THE WITNESS: OKAY.

7 MR. WOOTEN: DR. COOMER, CAN YOU SEE IN THE
8 BOTTOM THERE, THERE IS A LITTLE EYEBALL SYMBOL AND
9 A NUMBER?

10 THE WITNESS: YEAH.

11 MR. WOOTEN: BASED ON JUST YOUR GENERAL
12 KNOWLEDGE AND OWN KNOWLEDGE, WHAT DOES THAT EYEBALL
13 SYMBOL MEAN ON A PLATFORM LIKE THIS?

14 THE WITNESS: IT MEANS THAT 29,000 PEOPLE
15 HAVE VIEWED THIS. 29,000 PEOPLE -- NEW PEOPLE,
16 NATURALLY, YOU KNOW, KNOW WHERE I LIVE, WHAT MY
17 HOUSE LOOKS LIKE.

18 MR. WOOTEN: SINCE FRIDAY.

19 THE WITNESS: YEAH.

20 MR. WOOTEN: OKAY.

21 MR. WADE: YES, MA'AM?

22 GRAND JUROR: EARLIER, YOU MENTIONED THAT
23 YOU HAD TO LEAVE ABOUT A YEAR AND A HALF AGO.

24 THE WITNESS: YES.

25 GRAND JUROR: ARE THESE THREATS AND

1 ACCUSATIONS THE REASON WHY?

2 THE WITNESS: YEAH. AND I'LL EXPAND ON
3 THAT. SO ACTUALLY, BEFORE THE ELECTION, THERE WERE
4 ALREADY PEOPLE CLAIMING THAT DOMINION WAS -- WAS
5 GOING TO, YOU KNOW, DEFRAUD THE ELECTION. SO THE
6 COMPANY AT THE TIME -- I HIRED A CONTRACT SECURITY
7 FIRM, JUST TO, KIND OF, MONITOR THINGS. AND
8 SHORTLY AFTER NOVEMBER 3RD, I THINK IT WAS
9 NOVEMBER 4TH, THE COMPANY STARTED GETTING THREATS
10 THROUGH VARIOUS EMAIL CHANNELS.

11 AND SO THEN, THE PRIVATE SECURITY FIRM
12 STARTED DOING MORE RESEARCH, AND IN ONE COUNTY IT
13 HIT ON NOVEMBER 9TH, THEY HAD IDENTIFIED SOME
14 ACTUAL POTENTIAL REAL THREATS, FIGHTING PEOPLE.

15 SO IT WAS -- IT WAS THEIR STRONG SUGGESTION
16 THAT I NOT RETURN HOME, THAT I ACTUALLY GET A
17 SECURITY DETAIL, AND THAT I, ESSENTIALLY, GO INTO
18 HIDING.

19 SO THESE -- AND THE SECURITY FIRM THAT'S
20 INVOLVED, THAT'S JUST THE FBI AND POLICE OFFICERS
21 THAT DEAL WITH EMINENT THREATS LIKE THIS. SO, YOU
22 KNOW, THEY ACTUALLY DIDN'T WANT ME TO GO HOME.
23 THEY ACTUALLY WANTED ME TO MOVE, BUT I DON'T WANT
24 TO DO THAT. BUT I DID NOT LIVE THERE FOR SIX
25 MONTHS.

1 BY MR. WADE:

2 Q. TELL US ABOUT THE -- THE LETTER THAT'S ON THE
3 SCREEN THERE?

4 A. SO THIS IS FROM LAKE UNITED FRONT AGAINST
5 TRADERS, SOME MILITIA GROUP IN SPOKANE, WASHINGTON.
6 THIS IS A LETTER THAT I RECEIVED.

7 Q. TAKE YOUR TIME.

8 A. I'M SORRY.

9 Q. TAKE YOUR TIME.

10 A. SO IT'S A LETTER I RECEIVED, I THINK IT'S IN
11 NOVEMBER 23RD. MY FATHER RECEIVED A SIMILAR ONE. MY
12 FATHER RECEIVED A SIMILAR ONE. IT WAS -- IT WAS MUCH
13 LONGER. THIS ONE, HE JUST SENT AND ENDED UP IN JAIL,
14 THAT I'M A TRAITOR. THE ONE TO MY FATHER IS MUCH
15 LONGER. MY BROTHER RECEIVED ONE TOO.

16 SO, YOU KNOW, WITHIN TWO WEEKS, YOU KNOW, MY
17 WHOLE FAMILY HAD BEEN EXPOSED. AND SO, YOU KNOW, AT --
18 THIS -- THIS DAY -- SORRY.

19 Q. YOU TALKED ABOUT YOUR FATHER RECEIVING THREATS.
20 IS THAT -- YOUR DAD IS JUST A VETERAN, OR...

21 A. YEAH. MY DAD IS A WEST POINT GRAD, CAREER
22 MILITARY, FULL COLONEL, DECORATED VIETNAM VET. I FEEL
23 LIKE IF HE'S GOOD AT BEING A TRAITOR BECAUSE, OBVIOUSLY,
24 PRETTY HARD FOR HIM TO READ AFTER, YOU KNOW, SERVING FOR
25 20 THROUGH 35 YEARS.

1 Q. HAVE YOU HAD TO RELOCATE YOUR FAMILY, OR...

2 A. NO -- I MEAN, MY -- MY FAMILY HAS, SORT OF, TAKEN
3 ALL OF THE SAME PRECAUTIONS THAT I HAVE. YOU KNOW,
4 SECURITY SYSTEMS, TRYING TO KEEP LOWER PROFILE.

5 GRAND JUROR: HAVE YOU BEEN ABLE TO
6 PROSECUTE ANYONE?

7 THE WITNESS: NOT YET. I HAVE -- I HAVE
8 VARIOUS WITNESSES, BUT -- YEAH, NOTHING -- THE FBI
9 HAS A DIVISION FOR CLUBS AND ELECTION WORKERS THAT
10 RECEIVE THREATS, BUT NOTHING'S IN ACTION AT THIS
11 POINT.

12 GRAND JUROR: HOW DID THEY TARGET YOU? I
13 MEAN, HOW DID THEY JUST LASER FOCUS ON YOU?

14 THE WITNESS: THAT'S A REALLY GOOD QUESTION
15 THAT I HOPE MY CIVIL SUIT WILL EVENTUALLY GET TO
16 THE BOTTOM OF.

17 THE FACT IS, IS THAT I CAN SAY THAT THEY
18 TARGETED DOMINION FIRST.

19 GRAND JUROR: THAT MAKES SENSE, BUT FOR YOU
20 AS A PERSON, HOW DID THEY JUST FOCUS ON YOU?

21 THE WITNESS: THAT'S A GOOD QUESTION. I
22 DON'T -- I DON'T KNOW WHAT SPARKED THAT. I MEAN, I
23 HAVE, YOU KNOW, (UNINTELLIGIBLE) PROVIDED, YOU
24 KNOW, TESTIMONY IN FRONT OF VARIOUS STATE
25 LEGISLATURES AND IN SOME COURT CASES, AND THINGS

1 LIKE THAT, FOR THE COMPANY. I AM ON SEVERAL
2 PATENTS FOR PRODUCTS OF THE COMPANY, YOU KNOW.

3 LIKE I SAID, I -- I GAVE A PUBLIC
4 DEMONSTRATION OF THE EQUIPMENT HERE IN GEORGIA FOR
5 THE STATE LEGISLATURES, AND -- YEAH. WHY THEY, YOU
6 KNOW, SPECIFICALLY CAME AFTER ME TO BEGIN WITH,
7 I -- I -- I DON'T HAVE AN ANSWER FOR THAT.

8 BY MR. WADE: YES, SIR?

9 GRAND JUROR: AS AN EXECUTIVE OFFICER,
10 (UNINTELLIGIBLE) WERE YOU THE ONLY ONE?

11 THE WITNESS: I'M NOT -- I WASN'T AN
12 EXECUTIVE. THERE IS AN EXECUTIVE TEAM, AND -- AND
13 I'M NOT THE ONLY ONE THAT GOT THREATS. I MEAN,
14 THERE ARE -- MANY OF MY COLLEAGUES GOT THREATS.
15 BUT I -- I SEEM TO HAVE BECOME, SORT OF, THE
16 PRIMARY FOCUS.

17 BUT, YEAH, THEY POSTED -- THEY -- WHOEVER,
18 THEIR ENTIRE -- THE ENTIRE EXECUTIVE TEAM WAS
19 POSTED ON THE -- ON THE INTERNET WITH, YOU KNOW, A
20 SEXUALLY, YOU KNOW, SCOPE MARKINGS WITH RIFLES ON
21 THEIR FACES AND IN THE WORDS, TRAITOR, SO.

22 BY MR. WADE:

23 Q. ARE YOU AWARE OF THE LEGISLATIVE HEARING THAT
24 TOOK PLACE HERE IN GEORGIA, NOVEMBER/DECEMBER OF 2020,
25 WHERE THE ALLEGATION THAT THERE WERE ISSUES OF BEING

1 OFFICIAL?

2 A. YEAH. I'LL BE HONEST, THAT TIME WAS PRETTY
3 CHAOTIC. I -- I -- I COULDN'T RECALL ALL OF THE DETAILS
4 FROM THAT, BUT I -- I BELIEVE IT WAS -- IT WAS FROM THE
5 LEGISLATIVE THAT WE -- THAT THE HAND COUNT CAME ABOUT, I
6 BELIEVE.

7 Q. DID ANYONE REACH OUT TO YOU AND ASK YOU TO COME
8 AND TESTIFY?

9 A. FOR THAT ONE, NOT THAT -- NOT THAT I KNOW OF
10 BECAUSE, AGAIN, AT THAT POINT, I WAS -- I WAS,
11 ESSENTIALLY, IN HIDING. KEEP YOU AWARE.

12 Q. YOU WERE WHERE?

13 A. I WAS IN HIDING.

14 Q. OKAY. THERE WAS A REPORT THAT WAS PRODUCED AS A
15 RESULT OF THOSE LEGISLATIVE HEARINGS. WE'RE GONNA WALK
16 YOU THROUGH SOME OF THE INFORMATION THAT CAME OUT THAT'S
17 ON THE SCREEN.

18 WOULD YOU MIND READING THAT ALOUD FOR THE RECORD?

19 A. "THE SUBCOMMITTEE TAKES NOTICE OF THE VARIOUS
20 PUBLICLY-REPORTED FUNCTIONS OF DOMINION MACHINES AND
21 HEARD EVIDENCE THAT DOMINION MACHINES CAN DUPLICATE
22 FRAUDULENT BALLOTS TO THE POINT THAT NOT EVEN TRAINED
23 PERSONNEL CAN TELL THE DIFFERENCE BETWEEN A TEST BALLOT
24 AND A REAL BALLOT."

25 Q. TELL THE GRAND JURORS IF -- IF -- IS THAT VALID?

1 IS IT POSSIBLE IF IT'S NOT SEEN?

2 A. AGAIN -- I MEAN, CAN YOU CREATE A FRAUDULENT
3 BALLOT? POTENTIALLY, YOU HAVE THE -- THE MEANS OF DOING
4 IT. CAN THAT ACTUALLY COMPROMISE THE ELECTION, HIGHLY
5 UNLIKELY.

6 AGAIN, YOU KNOW, PRECINCTS, THEY -- THEY HAVE
7 CHECKING. THEY -- YOU KNOW, VOTERS ARE VERIFIED AGAINST
8 THEIR REGISTRATIONS. THE -- THE POST-ELECTION PROCESS
9 IS CALLED CANVASSING. ALL OF THAT DATA HAS VALIDATED
10 THE NUMBER OF PEOPLE OF PEOPLE THAT CHECKED INTO THE
11 PRECINCT, MATCHES THE NUMBER OF BALLOTS. THE NUMBER OF
12 MAIL-IN BALLOTS THAT ARE RECEIVED ARE VALIDATED AGAINST
13 THE SIGNATURES THAT ARE VERIFIED.

14 SO YOU CAN'T JUST ADD, YOU KNOW, \$10,000 AND NOT
15 SUDDENLY REALIZE YOU HAVE AN ISSUE. SO AGAIN -- YOU
16 KNOW, CAN I SIT AT HOME AND DRAW SOMETHING UP THAT LOOKS
17 LIKE A BALLOT, SURE. CAN I GET THAT INTO THE SYSTEM AND
18 COUNTED, HIGHLY UNLIKELY.

19 Q. IS THERE SOME LABEL ON IT THAT SAYS SAMPLE
20 BALLOT, OR...

21 A. YEAH. SO THERE IS A FUNCTION IN THE SYSTEM FOR
22 CREATING TEST BALLOTS, AND THAT'S USED FOR TESTING AND
23 VALIDATING THAT THE SYSTEM WORKS. AND, YES, THOSE ARE
24 ALL LABELED AS TEST BALLOTS.

25 Q. ALL RIGHT.

1 MR. WADE: GO TO THE NEXT ONE.

2 BY MR. WADE:

3 Q. CAN YOU READ THAT ONE FOR THE RECORD?

4 A. "TESTIMONY ALSO SUGGESTED THAT THE SCREENING
5 SYSTEM RESPONDS WIRELESSLY TO PING RESET FROM AN UNKNOWN
6 LOCATION."

7 THAT'S HAPPENED WITH THE POLL BOOKS, SO. AGAIN,
8 THIS IS CONFUSING WHAT THE DOMINION SYSTEM IS AND WHAT
9 THE POLL WORKS ARE. POLL WORKS ARE NOT PART OF THE
10 DOMINION SYSTEM THAT'S USED TO VALIDATE VOTER
11 REGISTRATIONS. THOSE, AS I EXPLAINED, DO HAVE WIRELESS
12 CAPABILITY BECAUSE THEY NEED TO VERIFY, IN REAL-TIME,
13 WHETHER A VOTER HAS VOTED IN SOME OTHER LOCATION.

14 THE DOMINION SYSTEM DOES NOT HAVE ANY WIRELESS
15 CAPABILITY, AND CERTAINLY NOT A WIRELESS CAPABILITY THAT
16 COULD RESET THE SYSTEM.

17 Q. ALL RIGHT.

18 MR. WADE: WE'VE GOT A QUESTION IN THE BACK
19 ABOUT THIS. GO AHEAD.

20 GRAND JUROR: SO IF THE POLL WORKS WERE
21 POTENTIALLY VULNERABLE, AND THEY WERE ABLE TO ADD
22 PEOPLE TO THE POLL VOTE SO THAT THEY COULD RECEIVE
23 A VOTE, (UNINTELLIGIBLE).

24 THE WITNESS: YOU HAVE TO HAVE THAT PERSON
25 SHOW UP AND VALIDATE THEIR REGISTRATION BEFORE THEY

1 CAN GET IN THE MACHINE, YEAH.

2 LIKE, THERE'S NOT CONNECTION BETWEEN THE
3 POLL VOTE AND THE VOTING SYSTEM. IT'S NOT LIKE YOU
4 CAN JUST SAY, HEY, THIS PERSON VOTED AND THEN SEND
5 A SIGNAL FOR THE PRINTER TO PRINT OUT A BALLOT WITH
6 WHATEVER VOTES YOU WANTED ON IT, AND THEN FEED THAT
7 INTO THE MACHINE.

8 MR. WADE: YOU HAVE A QUESTION?

9 GRAND JUROR: LET'S SAY I GO TO THE POLL
10 VOTES AND ADDED 100 VOTERS, OR SAY, THEY VOTED IN
11 THIS PRECINCT, BUT THEN I PUT IN A SECOND SHEET
12 SAYING THEY HAVEN'T VOTED. THEN, THEY HAVE 100
13 PEOPLE SHOW UP AND CLAIM THEY ARE ONE OF THESE
14 PEOPLE, THEN THEY CAN VOTE.

15 THE WITNESS: NO, NO BECAUSE THE VOTER
16 REGISTRATION LOOKS ACROSS PRECINCTS, AND THAT'S THE
17 WHOLE POINT OF THAT. IT, LIKE, HAS TO BE CONNECTED
18 TO THE CENTRAL OFFICE BECAUSE YOU WANT TO MAKE SURE
19 THAT YOU DON'T HAVE A PERSON VOTING ACROSS
20 PRECINCTS PRETENDING THAT THEY LIVE IN TWO
21 DIFFERENT PLACES. THAT WOULD BE CAUGHT IMMEDIATELY
22 BECAUSE AGAIN IF ADDING -- YOU CAN'T JUST ADD
23 VOTERS TO THAT REGISTRATION SYSTEM WITHOUT THE
24 CENTRAL OFFICE BEING UPDATED AND KNOWING THAT YOU
25 NOW -- YOU'RE USING -- AGAIN, YOUR EXAMPLE, THE

1 MAIN REGISTRATIONS IS JUST GOING TO SAY, HEY, NO,
2 THIS PERSON'S ALREADY REGISTERED IN THIS PRECINCT.
3 THIS IS INVALID.

4 SO YOU MIGHT CREATE A WHOLE NEW PEOPLE, BUT
5 THEN, YOU'LL ACTUALLY HAVE TO CREATE A WHOLE NEW
6 PEOPLE TO SHOW UP TO THAT PRECINCT WITH I.D., OR
7 WHATEVER TO --

8 GRAND JUROR: YOU HAVE TO START FROM THE
9 BEGINNING.

10 THE WITNESS: YES. AND AGAIN, THAT HAS
11 NOTHING TO DO WITH DOMINION SYSTEM. AND -- AND,
12 YOU KNOW, HAVE PEOPLE FALSELY REGISTERED ACROSS THE
13 U.S., SURE. IT'S A PRETTY LOW ASSURANCE RATE.
14 IT'S NOT AN EFFECTIVE WAY OF REALLY IMPACTING OUR
15 LIVES DURING THE POLLING.

16 MR. WADE: ALL RIGHT. NEXT SLIDE.

17 THE WITNESS: "THE SUBCOMMITTEE ALSO HEARD
18 THAT DOMINION MACHINES CAN BE PROGRAMMED WITH
19 ALGORITHMS THAT REALLOCATE VOTES BETWEEN
20 CANDIDATES."

21 FALSE. SO PART OF THAT CERTIFICATION
22 PROCESS THAT WE DISCUSSED WITH EBSC, ONE OF THE
23 STEPS IN THAT CERTIFICATION PROCESS IT'S WHAT'S
24 CALLED A CODE REVIEW. THE INDEPENDENT TESTING
25 LABORATORY IS CALLED THE VSTL, VOTING SYSTEM TEST

1 LABORATORY. THEY HAVE INDEPENDENT EMPLOYEES WHOSE
2 SOLE JOB IS TO GO THROUGH EVERY LINE CODE IN THE
3 SYSTEM AND DETERMINE WHAT IT DOES, THAT IT'S
4 WRITTEN PROPERLY, THAT IT DOES WHAT IT'S SUPPOSED
5 TO DO. SO WHEN THE CODE IS WRITTEN, EACH -- EACH
6 MODULE OF CODE IS DOCUMENTED ON WHAT THE PURPOSE IS
7 OF THE CODE, RIGHT? SO IT -- TEXT SAYS WHY, OR
8 WHATEVER IT IS.

9 THEY DO A FULL CODE REVIEW ON ALL LAUNCH
10 CODES, AND WE'RE TALKING ABOUT A MILLION LINES OF
11 CODE. BUT THEY GO THROUGH ALL OF IT, AND IT -- AND
12 THEY DO IT EVERY TIME THE SYSTEM IS -- IS
13 CERTIFIED.

14 ONCE THEY DO THAT CODE REVIEW, IT'S THE TEST
15 LABORATORY THAT -- WHAT'S CALLED COMPILED, TURNS
16 THAT CODE INTO THE APPLICATION THAT RUNS ON THE
17 MACHINE. THEY'RE THE ONES THAT DO THAT. SO
18 THEY'VE GOT THE TRUSTED PERSON WITH THE CODE THAT
19 THEY HAVE CODE REVIEWED. THEY CREATE THE
20 APPLICATION, AT THAT POINT, THEY TAKE WHAT'S CALLED
21 HASH A DIGITAL SIGNATURE OF THAT APPLICATION.
22 THAT'S THE OFFICIAL VERSION, AND THAT IS WHAT'S
23 VERIFIED OUT IN THE FIELD THAT -- THAT WHAT'S
24 LOADED ON THE MACHINES IN THE FIELD IS WHAT THE
25 INDEPENDENT TEST LABORATORY CREATED OFF THE

1 CERTIFIED CODE.

2 MR. WAKEFORD: SO JUST TO -- TO BOIL THAT
3 DOWN A LITTLE BIT, DOMINION WRITES CODE TO MAKE
4 THIS -- THIS SYSTEM WORK, AND IT'S SENT TO
5 INDEPENDENT REVIEWERS, WHO GO THROUGH EVERY SINGLE
6 LINE OF THAT CODE --

7 THE WITNESS: YES.

8 MR. WAKEFORD: -- TO SEE WHAT IT DOES.

9 THE WITNESS: YES.

10 MR. WAKEFORD: AND THEN THEY, SORT OF, TAKE
11 THE DOMINION SYSTEM AND MAKE A -- MAKE A --

12 THE WITNESS: AN APPLICATION.

13 MR. WAKEFORD: THEIR OLD VERSION. I KNEW --
14 THAT'S THEIR COPY OF THAT --

15 THE WITNESS: AND THAT IS THE OFFICIAL COPY.

16 MR. WAKEFORD: AND THAT -- OKAY. AND THAT
17 IS WHAT IS PUT INTO THE SYSTEM.

18 THE WITNESS: THAT IS WHAT HAS BEEN TESTING
19 TO VERIFY THAT IT WORKS PROPERLY ALONG WITH
20 EVERYTHING ELSE THAT DONE WITH THE ACCURACY
21 TESTING.

22 AND THEN, FROM THAT -- LIKE IF I'M GEORGIA,
23 GEORGIA DOESN'T GET THE -- THE SOFTWARE FROM
24 DOMINION, THEY GET IT FROM THE INDEPENDENT TESTING
25 LABORATORY.

1 MR. WAKEFORD: OKAY.

2 BY MR. WADE:

3 Q. DR. COOMER, WHERE ARE YOUR NOTES? LIKE, WHERE
4 ARE YOUR NOTES?

5 A. I DON'T HAVE ANY NOTES. THEY'RE IN MY HEAD.

6 Q. THEY'RE IN YOUR HEAD. I CAN DO THAT WITH THE
7 O.C.G.A. WITH THE LAW, I CAN DO THAT?

8 A. YEAH. I DID THIS JOB FOR 15 YEARS. I WAS GOOD
9 AT IT.

10 GRAND JUROR: IN THOSE 15 YEARS, WAS THERE
11 AFTER -- LIKE, I'M SURE YOU'VE HAD SO MANY
12 QUESTIONED RESULTS OF, LIKE, ELECTIONS BECAUSE OF
13 WHAT PEOPLE SAY AFTER THE ELECTION RACE. OH, I
14 DON'T KNOW IF THE RESULTS ARE CORRECT. HAVE YOU
15 HAD ANY OCCASION WHERE YOU ACTUALLY FOUND THAT
16 THERE WAS A PROBLEM?

17 THE WITNESS: YES.

18 GRAND JUROR: WITH DOMINION VOTING MACHINES
19 OR WITH YOUR PROGRAM OR WITH YOUR SOFTWARE WHEN --

20 THE WITNESS: NO, NOT WITH SOFTWARE. SO --

21 GRAND JUROR: OKAY.

22 THE WITNESS: SO THERE'S A HUMAN ELEMENT
23 THAT'S INVOLVED HERE. SO THE SOFTWARE LAST YEAR
24 DEFINED THE ELECTION.

25 GRAND JUROR: RIGHT.

1 THE WITNESS: AS WE DISCUSSED, THOSE
2 ELECTIONS, THEY CAN CHANGE. LIKE, A CANDIDATE CAN
3 SUDDENLY COME OFF THE BALLOT, OR GO ON THE BALLOT.
4 GENERALLY, THOSE ARE WHERE THE DISCREPANCIES IMPOSE
5 HAVE ARISEN, IS THAT A BALLOT HAS CHANGED. A
6 CANDIDATE CAME OFF AND WENT ON, AND NOT ALL OF THE
7 MACHINES GOT PROPERLY UPDATED.

8 GRAND JUROR: OKAY.

9 THE WITNESS: THAT IS LIKE THE PROBLEM.

10 GRAND JUROR: OKAY.

11 THE WITNESS: SO THERE HAVE BEEN PROBLEMS
12 LIKE THAT. THERE HAVE NOT BEEN ANY ELECTION
13 RESULTS THAT WEREN'T DUE TO A -- ESSENTIALLY, A
14 HUMAN CONFIGURATION ERROR.

15 GRAND JUROR: OKAY.

16 THE WITNESS: NOT DUE TO ANY FAULT IN THE
17 ACTUAL SOFTWARE.

18 GRAND JUROR: OKAY.

19 MR. WADE: ALL RIGHT. LET'S GO TO THE NEXT
20 SLIDE.

21 THE WITNESS: "IN ADDITION TO VENDING
22 MACHINES OR PROGRAMS HELP THOSE USING PERCENTAGES
23 OR WHOLE NUMBERS, RATHER THAN ACTUAL VOTES, WHICH
24 IS A FEATURE, INCOMPATIBLE WITH ACTUAL VOTING
25 PROCESSES."

1 AGAIN, COMPLETELY FALSE. I BELIEVE -- I
2 HAVE A PRETTY GOOD REASON TO BELIEVE THAT THE --
3 THE ORIGIN OF THIS STATEMENT IS TESTIMONY THAT I
4 GAVE IN FRONT OF THE ILLINOIS STATE BOARD OF
5 ELECTIONS. AND THAT WAS -- THAT WAS -- THIS IS
6 CALLED FRACTIONAL VOTING WHEN YOU CAN DO
7 PERCENTAGES OF VOTES. IT IS AN ACTUAL ACADEMIC WAY
8 OF VOTING.

9 THE DOMINION SYSTEM DOES NOT USE FRACTIONAL
10 VOTING. NO SYSTEM IN THE FIELD THAT I KNOW OF HAS
11 EVER DONE FRACTIONAL VOTING.

12 DOMINION ACQUIRED TWO COMPANIES -- TWO OTHER
13 VOTING COMPANIES; ONE WAS THE ONE I WORKED FOR,
14 SEQUOIA VOTING SYSTEMS, AND ONE WAS WAS PREMIER
15 ELECTION SYSTEMS.

16 PREMIER ELECTION SYSTEMS, AT ONE TIME, HAD A
17 CONTRACT TO BUILD A SYSTEM THAT COULD DO FRACTIONAL
18 VOTING. SO THERE WAS AN INTERNAL SOFTWARE VERSION
19 OF THE PREMIER EQUIPMENT THAT ACTUALLY DID
20 FRACTIONAL VOTING. IT WAS NEVER CERTIFIED AND WAS
21 NEVER SOLIDERED [SIC] IN THE FIELD. THAT CONTRACT
22 FELL APART.

23 SO PEOPLE GOT A HOLD OF SOME INTERNAL
24 PREMIER, SAY, DOCUMENTATION AND THEY JUST REVEALED
25 THAT THERE WAS FRACTIONAL VOTING IN ILLINOIS.

1 ILLINOIS WAS USING PREMIER VOTING SYSTEMS AT THE
2 TIME.

3 SO I WENT THERE TO TESTIFY THAT WHILE THE
4 SOFTWARE WAS WRITTEN TO DO THAT, IT WAS NEVER --
5 SINCE THE BUILD, IT WAS NEVER DELIVERED TO ANY
6 CUSTOMER, AND IT DIDN'T EXIST OUT INTO THE FIELD.

7 SO SOME PEOPLE TOOK PART OF MY TESTIMONY
8 REGARDING FRACTIONAL VOTING IN A PRIOR SYSTEM AND
9 CLAIMED THAT I WAS TESTIFYING THAT DOMINION DID
10 FRACTIONAL VOTING.

11 MR. WAKEFORD: HOW LONG AGO DID YOU GIVE
12 THAT TESTIMONY?

13 THE WAKEFORD: IT WAS THREE DAYS AFTER I
14 BROKE MY COLLARBONE. SO THAT WOULD'VE BEEN 2018, I
15 BELIEVE, OR 2017 -- 2017.

16 MR. WADE: LET'S TAKE A FIVE-MINUTE BREAK.
17 GIVE EVERYONE TIME TO STRETCH THEIR LEGS AND USE
18 THE BATHROOM -- OR MAYBE TEN MINUTES.

19 (A RECESS WAS TAKEN.)

20 MR. WADE: MADAM FOREPERSON, CAN YOU
21 ASCERTAIN THE NUMBER OF JURORS IN THE ROOM, PLEASE?

22 FOREPERSON: WE HAVE 17.

23 MR. WADE: 17. WE CAN DO BUSINESS WITH
24 THAT.

25 ALL RIGHT. SO WE'RE BACK ON THE RECORD. WE

1 LEFT OFF GOING THROUGH THE LEGAL REPORT SLIDE. SO
2 GO AHEAD WITH THE NEXT SLIDE NOW.

3 MR. WAKEFORD: WE ARE NOT.

4 MR. WADE: WOULD YOU READ THAT ONE, PLEASE,
5 DR. COOMER?

6 THE WITNESS: YEAH. "SO A SUBCOMMITTEE
7 LEARNED THAT HISTORY AND CONTROL OF THE COMPANY
8 THAT OWNS THE DOMINION VOTING SYSTEM IS UNCLEAR AND
9 PROVIDES SERIOUS IMPLICATIONS OF FOREIGN
10 INTERFERENCE IN THE NEXT ELECTION."

11 MR. WADE: YOUR RESPONSE?

12 THE WITNESS: YEAH, I DON'T -- I DON'T
13 UNDERSTAND THAT. SO THE COMPANY WAS FOUNDED IN
14 TORONTO CANADA, BACK IN 2003. I DON'T REMEMBER
15 WHEN THEY INCORPORATED IN THE U.S.

16 IT WAS PRIVATELY OWNED, THREE FOUNDERS TO
17 THE COMPANY, AND THEN A COUPLE OF OTHER
18 COMPANIES -- COMPANY EMPLOYEES HAD SOME OWNERSHIP
19 STAKE. I BELIEVE, AROUND 2018 OR 2019, THEIR
20 COMPANY WAS ACQUIRED BY A PRIVATE EQUITY GROUP THAT
21 IS U.S. BASED, STAPLE STREET CAPITAL (PH). I AM
22 UNAWARE OF ANY FOREIGN OWNERSHIP OF THAT U.S.
23 PRIVATE EQUITY GROUP.

24 BUT AGAIN, I WAS NOT AT THE EXECUTIVE LEVEL.
25 SO I DON'T NECESSARILY KNOW ALL THE DETAILS.

1 FOREPERSON: THIS IS PROBABLY THE DETAILS
2 THAT DOMINION HAS ACQUIRED SEVERAL COMPANIES SINCE
3 THEY ACQUIRED SEQUOIA?

4 THE WITNESS: SEQUOIA AND PREMIER WESTON
5 (PH), WHICH ARE ALL U.S. COMPANIES, YEAH. AND THEY
6 ONLY ACQUIRED ASSETS. YEAH, SO THE COMPANY IS,
7 ESSENTIALLY -- ACTUALLY BOTH COMPANIES, I THINK,
8 LIVES ON A LITTLE WHILE TO CLOSE UP BUSINESS. SO
9 THEY ACQUIRED INTELLECTUAL PROPERTY, ACQUIRED SOME
10 EMPLOYEES, OBVIOUSLY, I WAS ONE, AND A COUPLE OF
11 OTHER THINGS. BUT, YEAH, ALL OF THOSE WERE
12 LONGTIME U.S. COMPANIES AS WELL.

13 MR. WADE: ALL RIGHT. NEXT SLIDE.

14 THE WITNESS: "REX RANDLAND (PH), CYBER
15 SECURITY EXPERT FROM TEXAS TESTIFIED THAT HIS TEAM
16 HAD COMPARED DATA FROM DOMINION VOTING MACHINES AND
17 THOSE PLACES WHERE THEY WERE USED AROUND THE
18 NATION. THEY DISCOVERED WITH DOMINION MACHINES,
19 VICE PRESIDENT BIDEN OUTPERFORMED WHAT HE
20 STATISTICALLY EXPECTED TO RECEIVE BY AN AMAZING
21 FIVE PERCENT. HE ALSO OUT PERFORMED THE PHYSICAL
22 EXPECTATION WHEN THE ANALYSIS WAS RUN BY COUNTY,
23 WITH VICE PRESIDENT BIDEN PICKING UP 78 PERCENT OF
24 DOMINION'S COUNTY VOTING, 46 PERCENT OF COUNTIES
25 USING MACHINES FROM OTHER MANUFACTURERS. DEPENDING

1 ON THE TYPE OF ANALYSIS PERFORMED, GRANDS WERE
2 ESTIMATED, BUT THESE NUMBERS TRANSLATED TO BE
3 123,000 AND 136,000 EXTRA VOTES FOR VICE PRESIDENT
4 BIDEN IN GEORGIA."

5 I'M NOT FAMILIAR WITH THE, QUOTE, UNQUOTE,
6 DETAILS OF THE ALLEGED STATISTICAL ANALYSIS IN THIS
7 PARTICULAR CASE, BUT THIS TRACKS WITH MULTIPLE
8 ANALYSES THAT CLAIM TO HAVE PROVED FRAUD AND THEY
9 SUB-SCIENCE, TO PUT IT BLUNTLY.

10 THERE IS NO ACCOUNTING FOR -- I MEAN, WHEN
11 IT SAYS THAT DOMINION MACHINES HAD MORE VOTES FOR
12 BIDEN, WELL, THEY DON'T -- THEY DON'T SHOW YOU
13 WHERE COUNTIES ARE. WELL, THEY'RE IN DEEP BLUE
14 STATES, IN A LOT OF CASES. SO YOU WOULD EXPECT
15 MORE VOTES FOR BIDEN FROM DEEP BLUE STATES.
16 THERE'S NO ACCOUNTING FOR THAT.

17 ESNS IS PREDOMINANTLY IN THE MIDWEST, WHICH
18 TENDS TO VOTE REPUBLICAN. SO IT WAS NOT SURPRISING
19 TO ME THAT ANOTHER VENDOR HAS FEWER PERCENTAGES OF
20 VOTES. THIS IS NOT WHAT'S CALLED, LIKE, A
21 HOMOGENOUS DATASET, YOU KNOW. THIS ISN'T --
22 ELECTIONS AREN'T NEATLY DISPERSED ACROSS THE U.S.,
23 AND EVERYBODY VOTES ONE WAY OR THE OTHER, RIGHT?
24 THERE'S POCKETS, YOU KNOW. PEOPLE IN INDIANA DON'T
25 VOTE THE SAME PEOPLE IN CALIFORNIA.

1 FOREPERSON: ARE THE -- ARE THE MACHINES TO
2 USED ALL ACROSS THE STATE? LIKE, DOES ALL OF
3 GEORGIA USE DOMINION?

4 GRAND JUROR: ALL OF GEORGIA USES DOMINION,
5 YES.

6 FOREPERSON: AND OTHER STATES, WOULD THAT BE
7 TRUE WITH THOSE? I MEAN, LIKE, WHICHEVER ONE THEY
8 PICK, EVERYBODY USES, OR COULD THE --

9 THE WITNESS: IT COULD BE -- EVERY COUNTY
10 COULD BE DIFFERENT.

11 FOREPERSON: OKAY.

12 THE WITNESS: WELL -- SO -- SO -- SO THERE'S
13 ONLY, LIKE, FIVE VOTING VENDORS, BUT YES. EVEN IN
14 MY -- MINNESOTA, EVEN WITHIN A COUNTY, DIFFERENT
15 MUNICIPALITIES CAN USE DIFFERENT MACHINES.
16 MINNESOTA IS ONE OF THE PLACES THAT USE BUSINESS IN
17 VOTING. IT REALLY IS.

18 LIKE COLORADO, 60 -- WELL, AT THE TIME, 62
19 OF THE 64 COUNTIES USED DOMINION, TWO COUNTIES USED
20 A COMPETITOR.

21 IN ARIZONA, ONLY ONE COUNTY USES DOMINION,
22 THE REST USE THE OTHER. BUT THAT COUNTY IS
23 MARICOPA. IT ACCOUNTS FOR 60 PERCENT OF THE VOTE.

24 SO YEAH, THIS KIND OF ANALYSIS HAS NO -- NO
25 VALIDITY TO IT. IT'S JUST -- IT'S -- IT'S JUST

1 SOMEBODY RUNNING ELECTION NUMBERS AND CLAIMING THAT
2 MEANS SOMETHING WITHOUT ANY RIGOROUS INFORMATION
3 APPLIED TO IT.

4 SO AGAIN, I'VE THINK THERE ARE OTHER
5 PEOPLE -- THERE'S ANOTHER GUY OUT THERE THAT --
6 THAT DOES THIS. LIKE EVERY WEEK, HE COMES UP WITH
7 ANOTHER NUMBER THAT HE CLAIMS SHOWS, YOU KNOW,
8 FRAUD. BUT IT'S JUST SOMEBODY HAS TO WIN AN
9 ELECTION. AND IF THEY WIN AN ELECTION THAT MEANS
10 THEY GOT MORE VOTES.

11 SO WHAT HE'S SHOWING HERE IS THAT BIDEN GOT
12 MORE VOTES. WELL, HE WON THE ELECTION. I DON'T
13 KNOW HOW ELSE TO PUT IT.

14 MR. WADE: YES, MA'AM?

15 GRAND JUROR: DO YOU HAPPEN TO KNOW WHAT
16 MACHINES GEORGIA WAS USING PREVIOUSLY AND WHY THEY
17 SWITCHED TO DOMINION FOR THE 2020 ELECTION?

18 THE WITNESS: I SHOULD KNOW THIS. I THINK
19 IT WAS MICRO VOTE. GEORGIA HAD TO CHANGE BECAUSE
20 THE PRIOR SYSTEM WAS NOT ABLE TO BE CERTIFIED
21 ANYMORE. IT DIDN'T PERFORM. IT DIDN'T HAVE THE
22 ACCURACY. IT DIDN'T HAVE THE USER ABILITY --
23 USABILITY FEATURES THAT ARE ALL PART OF THE -- THE
24 VOLUNTARY VOTING GUIDELINES. IT -- IT -- IT DIDN'T
25 HAVE ANY REAL CAPABILITY FOR DISABLED VOTERS. THE

1 PRICE. SO THE SYSTEM WAS ANTIQUATED, TO SAY THE
2 LEAST, BACK THEN.

3 BUT AGAIN, I THINK IT WAS EITHER MICRO VOTE,
4 OR IT WAS ONE OF THE OTHER ONES. YOU KNOW, THOSE
5 TWO SYSTEMS HADN'T BEEN UPDATED FOR SECURITY
6 FEATURES, THE USABILITY FEATURES IN 20-PLUS YEARS,
7 SO.

8 AND THERE WAS -- IT WAS LIKE A TWO OR
9 THREE-YEAR SELECTION PROCESS, AND IT WAS, YOU KNOW,
10 BASED ON RIGOROUS GUIDELINES, AND DOMINION SCORED
11 THE HIGHEST. AND THAT'S WHY THEY WENT WITH THAT
12 SYSTEM.

13 MR. WADE: LET'S GO TO THE NEXT SLIDE.

14 THE WITNESS: PHIL WALKER, A FORMER U.S.
15 ARMY INFORMATION OFFICER WITH EXPERTISE IN
16 ELECTRONIC WARFARE, AGAIN, PROVIDED PRETTY
17 SIGNIFICANT INFORMATION, WORKED THEIR CAMPAIGN
18 CONDUCTED ACROSS THE COUNTRY FOR ANY ELECTION. HE
19 DESCRIBED THE HISTORY OF THE DOMINION AND OTHER
20 VOTING MACHINES WITH THE OPERATING SOFTWARE SHARING
21 THE SAME DNA, GOING BACK TO SMARTMATIC, WHICH WAS
22 CREATED TO HELP SECURE ELECTIONS IN THEM AS WELL."

23 SO I CAN START BREAKING THIS APART.
24 DOMINION MACHINES SHARE ABSOLUTELY NO, QUOTE,
25 UNQUOTE, DNA, OR SMARTMATIC. SMARTMATIC DID OWN

1 SEQUOIA FOR A BRIEF TIME, ABOUT A YEAR AND A HALF.
2 AND I WAS THERE WHEN SMARTMATIC OWNED IT. THERE IS
3 NO CREDIBLE EVIDENCE THAT SMARTMATIC EVER HELPED
4 STEAL ELECTIONS IN VENEZUELA. IN FACT, THERE WAS
5 ONE ELECTION (UNINTELLIGIBLE) THAT SEEMED TO BE
6 FRAUD, AND SMARTMATIC UNCOVERED IT. AND IT HAD TO
7 DO WITH, AGAIN, DOMINION ACCESSORY AIDE VOTERS
8 BECAUSE SMARTMATIC HAD ACTUALLY CAUGHT THAT.

9 BUT AGAIN, SMARTMATIC EVENTUALLY SOLD OFF
10 SEQUOIA, AND NONE OF THE, YOU KNOW, INTELLECTUAL
11 PROPERTY FROM SMARTMATIC EVER MADE IT INTO ANY
12 DOMINION PRODUCT.

13 WHEN IT TALKS ABOUT AN INFORMATION WARFARE
14 CAMPAIGN, I HAVE NO IDEA WHAT THAT IS, OR WHAT IT
15 REFERS TO. AND AS FAR AS I'M AWARE, I FOLLOWED
16 PHIL LONG-TERM BECAUSE HE'S ONE OF THE PEOPLE THAT
17 ATTACKED ME PRETTY REGULARLY. I'VE NEVER SEEN HIM
18 PROVIDE ANY EVIDENCE OF A WARFARE CAMPAIGN, SO.

19 MR. WADE: NEXT SLIDE.

20 THE WITNESS: "WALTER (PH) ANALYZED THESE
21 MACHINES IN MICHIGAN AND FOUND THEM EXTREMELY
22 INSECURE. HE SAID HE COULD HACK INTO THEM IN TWO
23 MINUTES, WHILE AN ELEMENTARY SCHOOL STUDENT COULD
24 PROBABLY DO IT IN 12. THERE ARE 12 AVENUES OF
25 ATTACK. DOMINION ALSO SENT VOTER DATA OUT OF THE

1 UNITED STATES."

2 AGAIN, THIS COULD AFFECT TO THE -- ASOD
3 REPORT OUT OF KANSAS, AND THIS IS WHAT HE'S
4 REFERRING TO. AS I'VE ALREADY STATED, YOU KNOW,
5 THE MAIN -- ONE OF THE MAIN OFFICES IN -- IN THE
6 WHOLE REPORT HAD TO DO WITH THE SYSTEM -- THE KIND
7 THAT DOMINION USED.

8 I - I'VE NOT SEEN -- AND I DON'T SEE
9 ANYTHING POINTING -- I'VE NEVER SEEN ANYTHING IN
10 THE INTERIM REPORT WHERE THEY -- THEY EXPLOITED ANY
11 OF THOSE, QUOTE, UNQUOTE, VULNERABILITIES.

12 IF HE SAID THAT HE COULD HACK IN TWO
13 MINUTES, I'VE NEVER SEEN THE RESULTS OF THAT. HE'S
14 NEVER PROVIDED THAT. IF IT'S SO EASY, THEY'VE
15 NEVER GIVEN A DEMONSTRATION OF THEM ACTUALLY
16 COMPROMISING THE MACHINE. THEY JUST TAKE THE FACT,
17 AND YOU'RE SUPPOSED TO BELIEVE IT.

18 DOMINION ALSO SENT VOTER DATA OUTSIDE THE
19 UNITED STATES. DOMINION DOESN'T HAVE ANY ACCESS TO
20 ANY VOTER DATA, PERIOD, THAT'S COUNTIES AND STATES.
21 DOMINION DOES NOT HANDLE ANY VOTE DATA, DOESN'T
22 HAVE ACCESS TO IT. I DON'T KNOW WHAT ELSE TO SAY
23 ABOUT THAT. THAT'S IMPOSSIBLE. WE DON'T --
24 DOMINION DOESN'T HAVE IT OUT TO RESEND IT ANYWHERE.

25 MR. WAKEFORD: SO JUST TO CLEAR ON THAT

1 ISSUE, SO IN 2020 WHEN THE ELECTION RESULTS WERE
2 TABULATED IN GEORGIA, AND THEY'RE -- YOU KNOW,
3 THAT'S DONE ON THE COUNTY AND STATE LEVEL. DOES
4 DOMINION HAVE ANY WAY TO ACCESS THOSE NUMBERS AND
5 MANIPULATE --

6 THE WITNESS: NO.

7 MR. WAKEFORD: -- THOSE NUMBERS ANY -- EVEN
8 ANY WAY TO ACCESS THEM AT ALL? OR IS THAT ALL
9 DONE --

10 THE WITNESS: THE ONLY ACCESS WOULD BE IF WE
11 GOT A -- A COPY FROM THE COUNTY.

12 MR. WAKEFORD: OKAY, YEAH.

13 THE WITNESS: THERE'S NO DIRECT ACCESS.

14 MR. WAKEFORD: SO THE WOULD HAVE TO ACTUALLY
15 PROVIDE THAT TO YOU.

16 THE WITNESS: YES.

17 GRAND JUROR: I GET MY CARD, SWIPE IT, I
18 CHOOSE MY -- MY CANDIDATES, I GET MY PAPER RUN
19 THROUGH THE MACHINE, AND THEY TABULATE IT. YOU
20 SAID THE ICS, OR THE TABLET MAINTAINS DATA IN A --
21 IN A CARD NUMBER SYSTEM.

22 THE WITNESS: NO. THE -- THE ICS -- THE
23 ONLY DATA IT HAS IS THE ACTUAL BALLOTS, THE
24 CONTESTING CANDIDATES. WHEN -- WHEN A VOTER
25 COMPLETES THEIR -- THEIR BALLOT AND GETS IT

1 PRINTED, IT DOESN'T RETAIN ANY OF THAT INFORMATION
2 ON THE ICS. THEY GET THAT VOTE INFORMATION.

3 MR. WAKEFORD: OKAY. THE ONLY THING IT
4 WOULD HAVE WILL BE TABULATED.

5 THE WITNESS: CORRECT, AND THAT'S THE ICC IN
6 THAT PRECINCT.

7 MR. WAKEFORD: BUT THAT -- BUT THE TABULATOR
8 IS A DOMINION SYSTEM; IS THAT CORRECT?

9 THE WITNESS: YES -- YEAH.

10 MR. WAKEFORD: SO THAT -- THAT PIECE OF
11 MACHINERY WOULD HAVE SOME MEMORY STORED IN THE --

12 THE WITNESS: THAT'S ONLY CONTROLLED BY THE
13 COUNTY.

14 MR. WAKEFORD: SO AT SOME POINT, THE MEMORY
15 GETS ZEROED OUT BY SOMEBODY?

16 THE WITNESS: YEAH, A POLL WORKER.

17 MR. WAKEFORD: SO THAT WHEN YOU USE A
18 MACHINE -- WHEN DOMINION GETS THE MACHINE --

19 THE WITNESS: WE NEVER GET THE MACHINE BACK.

20 GRAND JUROR: NEVER.

21 THE WITNESS: NEVER, UNLESS IT'S A -- LIKE A
22 WARRANTY OF SOMETHING. COUNTIES -- COUNTIES
23 STORE -- THEY HAVE BIG WAREHOUSES. ALL COUNTIES --
24 ONCE -- ONCE THEY RECEIVE THE EQUIPMENT INITIALLY,
25 THAT IS THERE'S UN -- UNTIL THEY EXTRACT IT, OR

1 UNTIL THEY -- IF THERE'S A REPAIR ISSUE, THEY MAY
2 SEND IT BACK TO US. GENERALLY, ESPECIALLY IN
3 GEORGIA BECAUSE IT'S -- IT'S A STATE CONTRACT. WE
4 ACTUALLY HAVE REPAIR PEOPLE GO OUT ONSITE.

5 FOREPERSON: SO IF -- IF YOU USE THE
6 EQUIPMENT AND THEY NEVER GIVE IT BACK TO DOMINION,
7 HOW DID -- WHAT HAPPENS IN THE NEXT ELECTION?

8 THE WITNESS: SO THAT'S --

9 FOREPERSON: YOU GUYS HAVE A PRIMARY --

10 THE WITNESS: YEAH. SO THAT'S THE ELECTION
11 MANAGEMENT SYSTEM. SO WE TRAIN AND WE STAFF ON HOW
12 TO USE THAT.

13 FOREPERSON: RIGHT.

14 THE WITNESS: SO LET'S TAKE THE PRIMARY.
15 COUNTIES HAVE A SYSTOLIC ELECTION MANAGEMENT
16 SYSTEM, AND DEFINES THE ELECTION CONTEST
17 CANDIDATES, RIGHT? THEY -- THEY -- YOU KNOW, THEY
18 LOAD THE ELECTION DATA ON THE INDIVIDUAL MACHINES,
19 THEY GO OUT TO THE PRECINCT, THEY ASK THEM -- THEY
20 GO OUT TO THE PRECINCT, THEY COME BACK IN, THEY
21 WIPE 'EM, THEY DO ALL OF THE TESTING, THEY VERIFY
22 THAT ALL THE SOFTWARE IS WHAT IT IS SUPPOSED TO BE.
23 THEN, THEY SHIP THAT DOWN FROM EMS, AND THEN THEY
24 DEFINE THE NEW ELECTIONS TO THE GENERAL. AND
25 THAT'S ALL COUNTY TASKS.

1 FOREPERSON: IT'S COUNTY TASKS.

2 THE WITNESS: YES.

3 FOREPERSON: OKAY.

4 MR. WADE: NEXT SLIDE.

5 THE WITNESS: "WALTER DISCUSSED FRACTIONAL
6 VOTING WHILE. WALTER TESTIFIED THAT DOMINION
7 SOFTWARE WE USED IN THE GEORGIA MACHINES PROVIDES A
8 FRACTIONAL VALUE TO EACH VOTE. THERE'S NO
9 LEGITIMATE PURPOSE IN THE SIGNING OF ELECTORS IF A
10 VOTE IS A FRACTIONAL VOTE. THAT FEATURE CAN ALLOW
11 THEM THE INABILITY IN ELECTION RESULTS."

12 WE COVERED THIS ALREADY. THERE IS NO SUCH
13 THING AS FRACTIONAL VOTING IN ANY SYSTEM FROM ANY
14 VENDOR THAT'S OUT IN THE FIELD, AND CERTAINLY NOT
15 THE DOMINION ONE, NEVER HAS BEEN.

16 MR. WAKEFORD: WHAT WOULD BE THE PURPOSE
17 AGREEMENT?

18 THE WITNESS: AGAIN, THERE ARE ACADEMIC --
19 SOME ACADEMICS THAT DID FRACTIONAL VOTING IS A MORE
20 REPRESENTATIVE WAY OF CONDUCTING AN ELECTION. SO
21 IF -- IF YOU HAD -- IF YOU HAD TWO CANDIDATES, YOU
22 KIND OF LIKED BOTH OF THEM, YOU DIDN'T KNOW
23 HOW -- YOU DIDN'T WANT TO VOTE FOR ONE OVER THE
24 OTHER, YOU COULD ASSIGN, LIKE, TWO-THIRDS OF THE
25 VOTE TO ONE, AND ONE-THIRD TO THE OTHER.

1 I DIDN'T SAY IT MADE SENSE, BUT THERE
2 ARE -- THERE ARE OTHER VARIETIES OF VOTING THAT
3 EXIST. WHAT WE PREDOMINATELY USE IN THE U.S. IS
4 WHAT'S CALLED FIRST PASS TO VOTE (PH). AND IT'S
5 ONE VOTE OR SOMETIMES TWO VOTES BECAUSE A CONTEST
6 CAN HAVE VOTES FOR TWO.

7 AND SO IT'S THE NUMBER OF ELECTED CHOICES,
8 AND YOU GIVE WHOLE VOTES, AND WHOEVER HAS THE
9 MAJORITY WINS. BUT THERE ARE A VARIETY OF OTHER
10 VOTING METHODOLOGIES THAT ARE OUT THERE; FRACTIONAL
11 VOTING IS ONE OF ANOTHER ONE CALLED RAM-CHOICE
12 VOTING, WHERE YOU ESSENTIALLY ORDER THE CANDIDATES
13 IN YOUR FAVORITE ORDER. SO YOU'RE MOST FAVORITE
14 WILL BE FIRST, AND YOUR LEAST FAVORITE WOULD BE
15 LAST. AND THERE'S A WAY OF THEM ASSIGNING AND
16 PICKING A WINNER BY LOOKING AT EVERYBODY'S RIGHT
17 CHOICE, SO, YEAH.

18 MR. WADE: NEXT SLIDE.

19 THE WITNESS: "SO FULTON COUNTY SAID HE
20 HIRED ONE OF HIS OWN GUYS TO DETERMINE FRACTIONAL
21 VOTES CAN BE RECORDED ON THE DOMINION MACHINES AT
22 THAT POINT IN THE PROCESS. NO. I'VE GOT ALL THESE
23 VOTES THAT HAVE NOT BEEN UPLOADED ANYWHERE, AND HE
24 ACTUALLY WROTE IN PAPER. AND HE SAID, "IT WAS THE
25 STUPIDEST, SIMPLEST THING I'VE EVER SEEN." HE

1 SAID, "DOMINION SHOWS DOCUMENTATION OF HOW YOU CAN
2 TAKE THE ENTIRE BATCH, SWIPE IT OFF, AND THEN WIPE
3 ON A NEW BATCH BEFORE YOU PUT IT INTO THE REAL-TIME
4 READER THAT UPLOADS. HE SUMMED UP THE VOTER FRAUD
5 BY USING AN ANALYSIS THAT DIRECTLY GOT PAID OFF TO
6 COMPLICATING AND SOMETHING IS VERY WRONG."

7 OKAY. THIS IS A MOUTH FULL, AND AGAIN,
8 I'M -- I'M -- I'M GONNA HAVE TO SPECULATE ON WHAT
9 HE ACTUALLY MEANS HERE. BUT VOTES ARE CALCULATED
10 AT THE PRECINCT, RIGHT? THEY'RE IN THE MACHINE.
11 WHEN THEY CLOSE VOTES, THERE'S A PAPER TAPE THAT
12 GETS PRINTED OUT, AND IT'S THE RESULTS FROM THAT
13 PRECINCT; ALL THE PAPER BALLOTS THAT ARE IN THERE.

14 THE IS -- THERE ARE ACTUALLY TWO REMOVABLE
15 MEMORY ELEMENTS; ONE, IT STAYS LOCKED IN THE
16 MACHINE UNTIL THE END OF THE ELECTION TO PROVIDE
17 SECURITY REDUNDANCY AND BACKUP. THE OTHER ONE IS
18 TAKEN OUT OF THE MACHINE ALONG WITH THE PAPER
19 BALLOTS, PUT INTO A TRANSFER CASE, AND TAKEN DOWN
20 TO CENTRAL OFFICE TO BE ACCUMULATED BECAUSE
21 OBVIOUSLY, THE ELECTION RESULTS PER COUNTY, ARE ALL
22 OTHER PRECINCTS GATHERED TOGETHER.

23 SO THE COUNTY DOES HAVE TO UPLOAD EACH OF
24 THOSE INDIVIDUAL PRECINCT RESULTS INTO THE SYSTEM.
25 YOU CAN'T JUST SWAP OUT ONE OF THOSE CARDS FOR YOUR

1 OWN MEMORY CARD BECAUSE THERE ARE SECURITY AND
2 ENCRYPTION KEYS AND CHECKS THAT ARE ON THOSE CARDS
3 THAT THE SYSTEM WILL REJECT IF THEY'RE NOT CORRECT,
4 THAT'S -- THAT'S ONE OF THEM.

5 EVEN IF YOU COULD GET ACCESS TO THE KEYS AND
6 SOMEHOW CREATE YOUR OWN RESULTS, THEY STILL
7 WOULDN'T MATCH THE PAPER TAPES THAT ARE IN THE
8 PRECINCT. I MEAN, IT STILL WOULDN'T MATCH PAPER
9 BALLOTS THAT ARE IN THE TRANSFER CASE, WHICH THEY
10 DID THE HAND COUNT ON, (UNINTELLIGIBLE/TRAIL OFF.)

11 SO, YOU KNOW, IF YOU TAKE JUST ONE PIECE IN
12 ISOLATION AND SAY, WELL, I CAN DO THIS AND THIS AND
13 THIS. YOU'RE IGNORING ALL OF THE OTHER REDUNDANT
14 COPIES THAT ARE DOWN IN STORAGE, AND ALL OF THE
15 OTHER SECURITY FEATURES THAT ARE INVOLVED.

16 FOREPERSON: YOU MENTIONED A COUPLE OF TIMES
17 THAT YOU WOULD NEED, LIKE, ENCRYPTION KEYS, LIKE,
18 TO GET ENCRYPTED INFORMATION. IF -- THAT YOU KNOW
19 OF, IS THERE ANYONE WHO HAS ALL OF THE KEYS?

20 THE WITNESS: NO.

21 FOREPERSON: LIKE, EVEN IN DOMINION, YOU'D
22 NEED --

23 THE WITNESS: YOU KNOW -- AND THE KEYS ARE
24 DIFFERENT FOR EACH ELECTION.

25 FOREPERSON: OKAY.

1 THE WITNESS: YEAH.

2 FOREPERSON: THEY CHANGE ALL THE TIME.

3 THE WITNESS: NO. AND WHEN I SAY "KEY", I'M
4 NOT TALKING ABOUT --

5 (CROSSTALK)

6 FOREPERSON: OKAY.

7 THE WITNESS: JUST SO I'M CLEAR, YEAH.

8 FOREPERSON. UH-HUH. (AFFIRMATIVE)

9 MR. WADE: AND CONGRATULATIONS DR. COOMER.
10 THAT WAS THE FINAL SLIDE.

11 THE WITNESS: ALL RIGHT.

12 MR. WADE: YOU SURVIVED IT. THANK YOU SO
13 MUCH.

14 DO ANY OF THE GRAND JURORS -- DO YOU HAVE
15 ANY QUESTIONS AT ALL ABOUT ANYTHING THAT WE'VE
16 ALREADY COVERED?

17 YES, SIR? THEN, WE'LL COME TO YOU.

18 GRAND JUROR: (UNINTELLIGIBLE) THAT'S
19 ALREADY BEEN COVERED, BUT WHEN DID YOU LEAVE
20 DOMINION, AND WHY DID YOU LEAVE?

21 THE WITNESS: I WAS PUT ON PAID LEAVE ON
22 NOVEMBER 19TH OR 20TH. I -- I'D BECOME A SECURITY
23 RISK FOR THE COMPANY -- OFFICIAL SECURITY RISK WITH
24 ALL OF THE DEATH THREATS THAT I WAS GETTING.

25 MR. WADE: NOVEMBER 19TH OR 20TH OF WHAT

1 YEAR?

2 THE WITNESS: SORRY, 2020. AND THEN, THE
3 COMPANY AND I AGREED TO SEPARATE END OF THE WEEK OF
4 MAY 14TH OF 2021. MY REPUTATION IN THE ELECTION
5 STILL HAS BEEN IRRETRIEVABLY RUINED. I'M NOT
6 ALLOWED -- I -- I AM NOT ABLE TO WORK IN THE FIELD
7 ANYMORE.

8 GRAND JUROR: ARE YOU PRESENTLY EMPLOYED BY
9 ANYONE?

10 THE WITNESS: I EMPLOYED BY MYSELF. I -- I
11 RUN A RESTAURANT.

12 GRAND JUROR: YOU RUN A RESTAURANT.

13 THE WITNESS: IT'S ALL RIGHT. WE MAKE GOOD
14 FOOD.

15 FOREPERSON: WELL FIRST OF ALL, NOW I WANT
16 TO KNOW WHAT KIND OF FOOD.

17 THE WITNESS: IT'S KINDA OF A
18 (UNINTELLIGIBLE), SMALL PLACE, AROUND THE WORLD.

19 GRAND JUROR: ACTUALLY, I WANTED TO KNOW IF
20 YOU THOUGHT THAT EVEN JUST, LIKE, HYPOTHETICALLY
21 THEORETICALLY, COULD YOU THINK OF ANY WAY THAT
22 THESE MACHINES HAD BEEN INTERFERED WITH. LIKE,
23 YOU'RE THE EXPERT. YOU'RE THE ONE WHO KNOWS THESE
24 MACHINES BETTER THAN ANYBODY.

25 THE WITNESS: AGAIN, I -- I KNOW MOST OF THE

1 VULNERABILITIES, AND THERE ARE VULNERABILITIES THAT
2 YOU HAVE ALL THE TIME IN THE WORLD AND UNFETTERED
3 ACCESS TO ONE MACHINE TO EXPLOIT THAT
4 VULNERABILITY, YEAH. WOULD IT BE UNDETECTABLE?
5 THAT'S ALWAYS ZERO PERCENT THAT IT CAN GO
6 UNDETECTABLE.

7 AND AGAIN, WHAT I RELY ON IS THERE WAS A
8 FULL-HAND RECOUNT OF ALL THE BALLOTS HERE IN
9 GEORGIA, AND THEY MATCHED THE RESULTS FROM ELECTION
10 DAY. THERE WAS A COMPLETE HAND RECOUNT OF THE
11 BALLOTS IN MARICOPA, ARIZONA, AND IT MATCHED THE
12 ELECTRONIC VOTING.

13 ALL OF THE RECOUNTS, ALL OF THE AUDITS, HAVE
14 SHOWN THAT THE RESULTS WERE CORRECT AND MATCHED THE
15 PAPER BALLOTS, WHICH WAS THE OFFICIAL RECORD.

16 MR. WADE: YES, SIR?

17 GRAND JUROR: THIS IS NOT REALLY A QUESTION
18 FOR THIS WITNESS. AND BY THE WAY, I ENJOYED
19 YOUR -- YOUR TESTIMONY. I LEARNED A LOT. THIS
20 (UNINTELLIGIBLE) I ASSUME HE'S A REPUBLICAN. ARE
21 WE GONNA HEAR HIS TESTIMONY?

22 (CROSSTALK)

23 MR. WADE:

24 GRAND JUROR: THE REASON I ASKED IS, YOU
25 KNOW, THE SLIDESHOW WAS EXCELLENT, BUT I KEEP

1 HEARING THESE WORDS -- WORDS OF EVIDENCE,
2 TESTIMONY, ALSO HEARD. THAT'S HEARSAY, AND I'M NOT
3 SURE WHAT HE MEANS BY EVIDENCE OR TESTIMONY.

4 IN OTHER WORDS -- AND AGAIN, THIS IS NOT FOR
5 THIS GENTLEMAN. I'M JUST WANT TO ASK A GENERAL
6 QUESTION. THIS SOUNDS LIKE -- I JUST DON'T KNOW
7 ANY OF THESE TEAM OF WORDS; SCOTT HALL OR THIS
8 WALKER DUDE. ARE WE GONNA HEAR FROM THOSE GUYS?

9 (CROSSTALK)

10 MR. WAKEFORD: SO GOOD QUESTION. THIS --
11 THIS REPORT THAT WE WERE GETTING WAS GENERATED BY A
12 SUBCOMMITTEE CHAIRED BY SENATOR WIGGINS. AS MR.
13 WADE INDICATED, WE ARE WORKING TO GET MR. WIGGINS
14 TO COME IN HERE AND TALK.

15 MR. WADE: THANK YOU.

16 MR. WAKEFORD: THE SUBCOMMITTEE TOOK
17 TESTIMONY AND DOCUMENTS FROM PEOPLE AT A COUPLE OF
18 HEARINGS.

19 MR. WADE: IF YOU CAN CALL IT A
20 SUBCOMMITTEE, BUT GO AHEAD.

21 MR. WAKEFORD: WELL, YEAH, THERE'S SOME
22 DEBATE ON THAT. AND THEN HE GENERATED A REPORT,
23 WHICH EVENTUALLY, WE'RE GONNA -- WE'RE GONNA PUT IN
24 FRONT OF YOU.

25 GRAND JUROR: OKAY.

1 MR. WAKEFORD: -- THAT HE WROTE -- SENATOR
2 WIGGINS WROTE, INDIVIDUALLY AND ACTUALLY TOOK PAINS
3 TO WRITE THIS REPORT THAT HE ALONE WAS WRITING THIS
4 REPORT BASED ON WHAT THIS SUBCOMMITTEE HAD SEEN.
5 SO WE WERE HAVING DR. COOMER RESPOND TO THE CLAIMS
6 THAT SENATOR WIGGINS PUT INTO THAT REPORT.

7 FINALLY, I WANT TO ADDRESS ONE THING, SIR,
8 YOU ARE CORRECT THAT OCCASIONALLY, HEARSAY HAS COME
9 INTO THIS ROOM. IT IS ACTUALLY PERFECTLY FINE FOR
10 HEARSAY TO COME BEFORE A GRAND JURY. AND THAT'S
11 NOT JUST A SPECIALIST GRAND JURY, BUT ALSO AN
12 ACCUSATORY GRAND JURY. HEARSAY IS ONLY NOT ALLOWED
13 IN A TRIAL. AND WE ARE -- THAT IS THE ONLY PLACE
14 WHERE HEARSAY IS STRICTLY POLICE. HEARSAY IS VALID
15 EVIDENCE FOR THE CONSIDERATION OF ANY GRAND JURY.

16 SO I APPRECIATE YOU FLAGGING THAT, AND IT'S
17 A GOOD POINT TO POINT OUT FOR EVERYBODY. YOU ARE
18 ALLOWED -- AND THE COURTS ALL THE WAY UP TO THE
19 SUPREME COURT OF UNITED STATES HAVE SAID FOR YEARS
20 THAT YOU ARE ALLOWED -- IT'S PERFECTLY VALID FOR
21 YOU TO CONSIDER HEARSAY.

22 MR. WADE: IT'S A BIT CONFUSING FOR YOU
23 BECAUSE WHAT WE TRY TO DO IS BRING INTO -- TO
24 FIRSTHAND KNOWLEDGE OF THE FIRST-HAND INFORMATION,
25 THE PROPONENT OF THE DECLARING OF THE STATEMENTS SO

1 THAT IT -- YOU DON'T QUESTION, RIGHT? THAT'S WHAT
2 WE TRY TO DO FOR YOU. THAT'S LIKELY TO BE A BIT
3 CONFUSING YOUR THINKING. YOU KNOW, IT'S A HEARSAY
4 COMPONENT.

5 MR. WADE: MR. NEY?

6 MR. NEY: I HAVE A QUICK POINT OF
7 CLARIFICATION THAT ACTUALLY DOGTAILS THE PREVIOUS
8 QUESTION. AS ALREADY POINTED OUT, THE STATEMENTS
9 THAT YOU JUST ADDRESSED ACTUALLY COME FROM A REPORT
10 THAT SEN. WIGGINS OFFERED THAT CAME FROM A HEARING
11 THAT OCCURRED IN THE GEORGIA STATE SENATE ON
12 DECEMBER 3RD. I APPRECIATE YOU ADDRESSING IT TO
13 THIS POINT.

14 WHEN YOU LOOK THROUGH THE REPORT AND YOU
15 ACTUALLY LISTENED TO THE HEARINGS, IT STOOD OUT TO
16 ME THAT -- THAT NO WITNESS WAS CALLED THAT WAS
17 ACTUALLY A REPRESENTATIVE OF DOMINION.

18 YOU HAD STATED TO MR. WADE THAT TO YOUR
19 KNOWLEDGE, SENATOR WIGGINS NOR ANY OTHER MEMBER OF
20 THIS COMMITTEE REACHED OUT TO YOU TO PARTICIPATE IN
21 THIS HEARING.

22 SO MY QUESTION IS, TO YOUR KNOWLEDGE IF THEY
23 REACHED OUT TO ANY OTHER REPRESENTATIVE OF DOMINION
24 TO BE THERE?

25 THE WITNESS: NOT TO MY KNOWLEDGE. CAN I

1 MAKE A COMMENT -- A QUICK COMMENT? SO I READ A LOT
2 OF THESE REPORTS THAT ARE INTERIM REPORTS THEY HAD
3 ASSEMBLED AT A HEARING -- QUOTE, UNQUOTE, HEARING.
4 NONE OF THOSE WERE UNDER OATH. NONE OF THAT
5 TESTIMONY GIVEN WAS UNDER OATH.

6 MR. WADE: YES, MA'AM?

7 FOREPERSON: SO PRIOR TO THIS ELECTION WE'RE
8 DISCUSSING, YOU SAID YOU SPENT, LIKE, 15 YEARS
9 WORKING --

10 THE WITNESS: YEAH. MY FIRST ELECTION WAS
11 IN 2006.

12 FOREPERSON: AND YOU TESTIFIED IN FRONT OF
13 OTHER COMMITTEES AND HEARINGS. SO PRIOR TO THIS
14 ELECTION, WHAT WOULD YOU SAY WAS, LIKE, YOUR
15 REPUTATION IN THIS ELECTION? I DON'T KNOW. LIKE,
16 YOU JUST SAID THAT YOU KNOW YOUR REPUTATION HAS
17 BEEN RUINED.

18 THE WITNESS: I WAS -- I WAS HIGHLY REGARDED
19 IN THE ELECTION COMMUNITY AND I STILL AM FROM
20 PEOPLE IN THE COMMUNITY.

21 FOREPERSON: AND WHO WAS THE -- CAN I ASK
22 YOU WHO ASKED YOU THAT QUESTION?

23 THE WITNESS: HIS NAME IS JOE LOPMANN.

24 FOREPERSON: HOPEMAN?

25 THE WITNESS: LOPMANN; L-O-P-M-A-N-N.

1 FOREPERSON: THANK YOU.

2 GRAND JUROR: DID THIS SUBCOMMITTEE FIND OUT
3 THAT YOU ARE IN HIDING NOW?

4 THE WITNESS: YEAH, I MEAN, I -- I -- I
5 NEVER CHANGED MY PHONE NUMBER. MY EMAIL ADDRESS
6 WAS THE SAME. AND THIS HAS BEEN, KIND OF, AN
7 ONGOING THING. YET, THEY WERE, LIKE -- WELL, HOW
8 COULD WE FIND YOU? YOU WERE IN HIDING. I WAS
9 LIKE, WELL, YOU HAD MY PHONE NUMBER TOO, BUT. IT'S
10 BEEN POSTED PUBLICLY.

11 MR. NEY: AND TO THAT POINT, DIDN'T YOU
12 MENTION THAT WHEN -- WHEN THE STATE LEGISLATURE WAS
13 TRYING TO DECIDE WHICH COMPANY TO GO WITH, YOU
14 ACTUALLY WENT BEFORE THEM AT THAT TIME TO TESTIFY?

15 YOU WOULD ACTUALLY COME TO THE STATE
16 LEGISLATURE BEFORE --

17 THE WITNESS: YES.

18 MR. NEY: -- WHICH WOULD MAKE YOU THINK THAT
19 THEY COULD'VE FOUND YOU.

20 THE WITNESS: YES, ABSOLUTELY.

21 MR. NEY: I SEE.

22 MR. WADE: YES, SIR?

23 GRAND JUROR: ALL OF THOSE STATEMENTS AND
24 ALL OF THOSE KINDS OF THINGS IN THE REPORT,
25 ASSUMING SOMEBODY IN DOMINION TRIED TO VERIFY. I

1 KNOW YOU TALKED ABOUT THE THINGS THEY DID TO YOU.

2 AS OF NOW, HOWEVER, TWO YEARS INTO THIS,
3 THERE'S NO EVIDENCE THAT ANY MACHINE WAS TAMPERED
4 WITH, OR ANYTHING LIKE THAT FROM THAT COMMITTEE OR
5 ANY OTHER COMMITTEE.

6 THE WITNESS: THAT'S CORRECT.

7 GRAND JUROR: (UNINTELLIGIBLE).

8 THE WITNESS: ABSOLUTELY. THAT WOULD BE
9 SOMEBODY FROM THE COUNTY OR STATE. AND AGAIN --

10 GRAND JUROR: HOW DO YOU EXPECT THAT
11 VULNERABILITIES WITH MORE HUMAN HANDS ON
12 IT (UNINTELLIGIBLE).

13 THE WITNESS: YEAH -- I MEAN, DOMINION DOES
14 PROVIDE BY --

15 GRAND JUROR: (UNINTELLIGIBLE).

16 THE WITNESS: THAT'S -- THAT'S POLICIES AND
17 PROCEDURES. BUT AGAIN, THAT'S, SORT OF, A GENERIC
18 FIT, AND IT'S -- IT'S REALLY UP TO THE STATE AND
19 COUNTIES TO DEFINE THOSE. AND THIS -- I KNOW I CAN
20 SAY FOR SURE THAT GEORGIA, THE STATE OFFICE HAS
21 DONE A GREAT JOB DEFINING THOSE PROCEDURES AS --
22 THEY'RE ONE OF THE ONES TO BE HONEST.

23 MR. WADE: BY STATE OFFICE, HE'S REFERRING
24 TO BRAD RAFFENSPERGER.

25 THE WITNESS: AND GABE STERLING.

1 MR. WADE: YES, MA'AM, MADAM FOREPERSON?

2 FOREPERSON: (NO RESPONSE.)

3 MR. WAKEFORD: SIR, IN THE FRONT ROW, WAS
4 THERE A FOLLOW-UP QUESTION?

5 GRAND JUROR: YOU MENTIONED A QUESTION --

6 MR. WAKEFORD: I JUST WANTED TO MAKE SURE.

7 GRAND JURORS: WELL, REALLY WHAT I WAS
8 CONCERNED ABOUT WAS THIS -- THIS SINISTER, WHO
9 HOLDS THIS HEARING, I WOULD SURE LIKE TO HEAR WHAT
10 HE HAS TO SAY AND HEAR WHO HIS EXPERT WITNESSES
11 WERE. IT SURE SOUNDS TO ME LIKE EVERYBODY ARRIVED
12 AT A CONCLUSION WITHOUT REVIEWING THE FACTS. BUT
13 THAT'S JUST MY OPINION.

14 MR. WADE: SO WE'RE WORKING VERY HARD TO HIM
15 TO TALK TO YOU. THAT GENTLEMAN BEHIND YOU, IN THE
16 CORNER THERE, AND HIS TEAM. HE'S THE INVESTIGATOR.
17 THEY ARE DOING WHAT THEY SAID TO GET THESE PEOPLE
18 HERE FOR YOU AND THAT THEY'VE DONE AN ENORMOUS JOB
19 OF DOING THAT SO FAR. AND I BELIEVE THAT BEFORE
20 WE'RE DONE, HE'LL BE SITTING IN FRONT OF YOU.

21 HE MAY NOT WILLINGLY BE SITTING IN FRONT OF
22 YOU, BUT YOU HAVE THE AUTHORITY AND -- AND THE
23 POWER TO -- TO GET HIM HERE.

24 MR. WAKEFORD: AND -- AND ONE THING, I FEEL
25 LIKE I HAVE ADDRESSED THIS, BUT I -- IT BEARS

1 REPEATING. IT IS INEVITABLE THAT WITH AN ISSUE
2 THIS COMPLEX AND IT'S CRAWLING, THAT WHEN WE TALK
3 TO A WITNESS WITH THE DISCRETE EXPERTISE AND
4 KNOWLEDGE ABOUT WHAT HAPPENED HERE, IT'S GOING TO
5 TOUCH UPON OTHER THINGS THAT WE HAVEN'T GOTTEN TO
6 YET BECAUSE WE CAN ONLY GIVE YOU ONE WITNESS AT A
7 TIME.

8 SO UNFORTUNATELY, THERE ARE PEOPLE WHO WE
9 REFERRED TO, OTHER EVENTS, OR OTHER WITNESSES, WHO
10 WE HAVEN'T BEEN ABLE TO GET IN FRONT OF YOU YET.
11 JUST ONE AT A TIME, WE WILL KEEP BRINGING PEOPLE IN
12 HERE UNTIL WE CAN'T.

13 MR. WADE: TO BE CONTINUED. OKAY. YES,
14 MA'AM?

15 FOREPERSON: I WAS GOING TO ASK YOU -- YOU
16 SAID THAT YOU REALLY COULDN'T -- I DON'T KNOW WHAT
17 YOU CALL IT. YOU SAID THAT YOU WERE GONNA HELP
18 WITH GEORGIA DECIDING, USUALLY, IN THE FIRST PLACE.

19 THE WITNESS: YEAH, I GAVE PRESENTATIONS.

20 FOREPERSON: RIGHT. YOU SAID THERE WERE
21 OTHER ELECTORAL VENDORS AND ELECTION VENDORS.

22 THE WITNESS: YES.

23 FOREPERSON: HOW MUCH OF THAT
24 CONVERSATION -- LIKE WHEN THAT WAS DISCUSSED WITH
25 GEORGIA WHICH VOTING MACHINES THEY WERE GOING TO GO

1 WITH. HOW MUCH OF THAT CONVERSATION WAS ABOUT THE
2 MONEY?

3 THE WITNESS: THAT IS -- THAT'S THE FINAL
4 STEP. SO AGAIN, THIS IS A MULTI-YEAR PROCESS.

5 FOREPERSON: UH-HUH. (AFFIRMATIVE).

6 THE WITNESS: WE HAD TO SHOW THAT WE'VE
7 COMPLIED WITH ALL OF THE STATUTES, PERFORMANCE
8 METRICS, AND THIS BIG WHOLE THING. AND YOU PROVE
9 WHAT'S CALLED AN RFP, A RESPONSE TO AN RFP, A
10 REQUEST FOR PROPOSAL.

11 THE MONEY IS THE LAST THING THAT'S
12 DISCUSSED, SO.

13 FOREPERSON: OKAY.

14 MR. WADE: OKAY, DR. COOMER. THANK YOU VERY
15 MUCH FOR YOUR TIME. I KNOW YOU HAVE A PLANE TO
16 CATCH, AND WE DON'T WANT TO BUY ANOTHER TICKET. SO
17 THANK YOU VERY MUCH --

18 THE WITNESS: THANK YOU.

19 MR. WADE: -- AND WE WILL EXCUSE YOU FROM
20 YOUR SUBPOENA AT THIS TIME.

21 THE WITNESS: APPRECIATE IT.

22 MR. WADE: DOES THE -- DOES THE GRAND JURORS
23 WANT TO PUSH FORWARD, OR YOU WANT TO TAKE A BREAK?

24 GRAND JURORS: A SHORT BREAK.

25 (PROCEEDINGS CONCLUDED AT 11:21 A.M.)

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C E R T I F I C A T E

STATE OF GEORGIA:

COUNTY OF FULTON:

I hereby certify that the foregoing transcript was reported, as stated in the caption, and the questions and answers thereto were reduced to typewriting under my direction; that the foregoing pages represent a true, complete, and correct transcript of the evidence given upon said hearing, and I further certify that I am not of kin or counsel to the parties in the case; am not in the employ of counsel for any of said parties; nor am I in any way interested in the result of said case.

This 26th day of August, 2023.

/s/ DENISE D. LEE
Denise D. Lee, CVR, CCR-GA, BS
Certified Court Reporter/Notary
4811-9915-6854-8864

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TRANSCRIPT CODES

-- denotes interruption/change in thought
... denotes incomplete thought
[sic] denotes word/phrase written verbatim
(ph) denotes word spelt phonetically
(inaudible) denotes word cannot be heard
(Unintelligible) denotes word(s) cannot be understood