

# **EXHIBIT 11**

**Redacted for PII**



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1 THE VIDEOGRAPHER: Good morning.  
2 We're going on the record at 10:20 a.m.,  
3 Monday, August 15th, 2022. Please note  
4 the microphones are sensitive and may pick  
5 up whispering, private conversations and  
6 cellular interference.

7 Please turn off all cell phones or  
8 place them away from the microphones as  
9 they can interfere with deposition audio.  
10 Audio and video recording will continue to  
11 take place unless all parties agree to go  
12 off the record.

13 This is media unit one of the video  
14 recorded deposition of Eric Chaney taken  
15 by counsel for defendant in the matter of  
16 Donna Curling, et al. versus Brad  
17 Raffensperger, et al., filed in the United  
18 States District Court of the Northern  
19 Georgia -- District of Georgia, Case  
20 Number 1:17-CV-02989-AT.

21 This deposition is being held at the  
22 Fairfield Inn, located at 1815 Peterson  
23 Avenue South, Douglas, Georgia.

24 My name is Scott Bridwell. I'm from  
25 the firm of Veritext Legal Solutions. I

1 am the videographer. The court reporter  
2 is Debra Druzisky from the firm Veritext  
3 Legal Solutions.

4 I am not authorized to administer an  
5 oath. I am not related to any party in  
6 this action, nor am I financially  
7 interested in the outcome.

8 Counsel and all present in the room  
9 and everyone attending remotely will now  
10 state their appearance and affiliations  
11 for the record.

12 MR. CROSS: David Cross of Morrison &  
13 Foerster on behalf of the Curling  
14 plaintiffs. And with me is my colleague  
15 Jenna Conaway.

16 THE WITNESS: Eric Chaney, witness.

17 MR. DELK: Stephen Delk on behalf of  
18 Mr. Chaney.

19 MR. PICO-PRATS: Javier Pico-Prats on  
20 behalf of the state defendants.

21 (Whereupon, a technical discussion  
22 ensued off the record.)

23 THE VIDEOGRAPHER: Will the court  
24 reporter please swear in the witness?

25 ///



1 ERIC B. CHANEY,  
2 having been first duly sworn, was examined and  
3 testified as follows:

4 THE VIDEOGRAPHER: Thank you. We may  
5 proceed.

6 EXAMINATION

7 BY MR. CROSS:

8 Q. Good morning, Mr. Chaney.

9 A. Good morning.

10 Q. Appreciate you being here. You are here  
11 pursuant to a subpoena; right?

12 A. Yes.

13 Q. And can you just give me your full name  
14 again for the record?

15 A. Eric Brandon Chaney.

16 Q. And where do you currently live?

17 A. [REDACTED]

18 [REDACTED]

19 Q. Okay. And how long have you been at that  
20 address?

21 A. A couple months.

22 Q. And where were you before that?

23 A. [REDACTED].

24 Q. And how long were you there?

25 A. Two years.

1 Q. And then how about before that?

2 A. I've lived in Douglas my entire life.

3 Q. Okay. So always in Douglas, Georgia?

4 A. Yes.

5 Q. Okay. And sorry. I get confused with  
6 counties in Georgia. You guys have a lot of  
7 counties, 159; right?

8 A. We do.

9 Q. I grew up in South Carolina. I don't  
10 think we have that many. What county do you  
11 currently live in?

12 A. Coffee.

13 Q. And how long have you been in Coffee  
14 County?

15 A. My entire life.

16 Q. Your whole life. Okay.

17 Have you -- so you've always voted in  
18 Coffee?

19 A. That's correct.

20 Q. Okay. All right. Have you been deposed  
21 before?

22 A. I have.

23 Q. How many times?

24 A. Once.

25 Q. And just generally, what kind of case was

1 that?

2 A. A civil case.

3 Q. Okay. Were you a witness or a party?

4 A. A party.

5 Q. Okay. Defendant?

6 A. Yes.

7 Q. Okay. So this will probably be similar.  
8 I'll ask you questions during the course of the  
9 day. You have to -- you have to answer the  
10 question I ask unless Mr. Delk instructs you not  
11 to.

12 If at any point you have a question about  
13 the question, something's not clear, just tell me.  
14 If you want to take a break at any point, that's  
15 fine. The only rule is you have to answer a  
16 pending question --

17 A. Sure.

18 Q. -- unless the break is to ask a question  
19 to your counsel about privilege. Otherwise, you  
20 need to answer.

21 Answers need to be audible and need to be  
22 "yes" or "no," not "huh-uh" or "uh-huh."

23 A. Right.

24 Q. Otherwise, it makes it hard for Debra.

25 Is there any reason that you feel you

1 cannot testify truthfully and completely today?

2 A. No.

3 Q. Okay. You're not on any kind of  
4 medications or anything that might affect your  
5 testimony?

6 A. No.

7 Q. Where did you go to school?

8 A. I went to school in Coffee County since  
9 kindergarten and attended South Georgia College at  
10 the time. It's now South Georgia State College.

11 Q. And that's here in Coffee County?

12 A. That's correct.

13 Q. When did you graduate college?

14 A. I did not graduate from college.

15 Q. All right. Did you attend '98 to 2001?

16 A. In college? I did.

17 Q. Okay. So you didn't do, what, a senior  
18 year?

19 A. Yes. I attended college and high school  
20 my senior year.

21 Q. Okay. And then so you didn't get a  
22 degree?

23 A. I did not.

24 Q. Got it.

25 Do you have any other formal education

1       besides a high school degree and attending college?

2           A.    I do not.

3           Q.    Okay.  And you run a car dealership?

4           A.    Yes, sir.

5           Q.    How long have you done that?

6           A.    Since 2001.

7           Q.    Okay.  So you left college and started  
8       running the car dealership?

9           A.    That's correct.

10          Q.    Do you own the dealership?

11          A.    I do not.

12          Q.    So you -- are you a manager?

13          A.    I am actually the C.E.O.

14          Q.    C.E.O.?  Okay.

15          A.    Yes, sir.

16          Q.    So you started at that same -- so you  
17       started at that same dealership in 2001 and you've  
18       been there for 21 years?

19          A.    Yes.

20          Q.    What did you start as?

21          A.    I guess in sales.

22          Q.    Okay.

23          A.    Yeah.

24          Q.    When did you become the C.E.O.?

25          A.    I don't recall.

1 Q. Would you say it's more than five years?

2 A. Yes.

3 Q. More than ten years?

4 A. No.

5 Q. Okay. Who owns the dealership?

6 A. Donnie Chaney, my father.

7 Q. Okay. And new cars or used?

8 A. Used.

9 Q. And that's here in Coffee County?

10 A. Yes.

11 Q. Is that in Douglas?

12 A. Yes.

13 Q. Okay.

14 (Whereupon, a technical discussion  
15 ensued off the record.)

16 BY MR. CROSS:

17 Q. Have you had any other jobs since you left  
18 college besides the dealership?

19 A. No, sir.

20 Q. Okay. And at some point you served on the  
21 Coffee County Board of Elections; right?

22 A. That's correct.

23 Q. How long did you do that?

24 A. I'm not really sure an exact date that I  
25 went on the board.

1 Q. Would you say you served on the board more  
2 or less than five years?

3 A. More.

4 Q. Okay. More than ten?

5 A. No.

6 Q. More than seven?

7 A. No.

8 Q. So somewhere maybe in the five to six,  
9 seven-year range?

10 A. That's correct.

11 Q. Okay. And do I understand you resigned  
12 from the board last Friday?

13 A. I did.

14 Q. Okay. And what was the reason for that?

15 A. Because I moved down to Mallard Point from  
16 Bay Meadows.

17 Q. And where is Mallard Point?

18 A. It's on the east side of the county. Bay  
19 Meadows is on the southwest side of the county.  
20 District 3 is Bay Meadows encompassment, and  
21 Mallard Point is District 5, if I recall correctly.

22 Q. Okay. So but you still live in the  
23 county?

24 A. Yes.

25 Q. So why would you need to resign from the

1 board if you're still in the county?

2 A. I was under the impression that the board  
3 member has to reside within the district of the  
4 commissioner who appoints him.

5 Q. I see.

6 How many districts are there in the  
7 county?

8 A. I think five.

9 Q. Okay. There's six voting precincts;  
10 right?

11 A. I'm not sure.

12 Q. Okay. Does each district have its own  
13 voting precinct?

14 A. There again, I'm not sure --

15 Q. Okay.

16 A. -- specifically.

17 Q. Okay. Just make sure you keep your voice  
18 up.

19 A. Sure.

20 Q. Okay. So how many members of the board  
21 are there?

22 A. Five.

23 Q. And each member of the board is appointed  
24 by a commissioner of a particular district?

25 A. Yes.



1 Q. And what district were you appointed for?

2 A. Three.

3 Q. Okay. And when were you appointed? That  
4 was sometime in the last five to seven years?

5 A. Correct.

6 Q. Okay. And who appointed you?

7 A. Commissioner A.J. Dovers.

8 Q. When did you move out of District 3?

9 A. Specifically, I'm not exactly sure of the  
10 exact date, but a couple months ago.

11 Q. Okay. And so what brought that to a head  
12 on Friday?

13 A. I have -- or had talked to my commissioner  
14 about, you know, if did I need to resign, did I  
15 need to, you know, turn the resignation letter in.  
16 They was not sure.

17 And they finally got some legal grounds  
18 that you can't serve unless you're living or  
19 residing within the district that you're appointed  
20 to. So.

21 Q. Okay. So this was an issue that just came  
22 up on Friday?

23 A. It's an issue we addressed on Friday.

24 Q. Okay. When did -- when did the issue  
25 first arise?

1 A. I notified the commissioner when I moved.

2 Q. And that was a couple months ago?

3 A. Yes.

4 Q. Okay. And then when did you first hear  
5 from the commissioner that you needed to live in  
6 the district?

7 A. Friday.

8 Q. Okay. So you heard the same day and  
9 resigned that day?

10 A. That's correct.

11 Q. Who else is current -- well, strike that.  
12 Who is currently on the board right now  
13 for Coffee County?

14 A. Our chairperson is Ms. Ernestine  
15 Thomas-Clark. Co-chair I believe is either Wendell  
16 Stone or Matthew McCullough. I'm not 100 percent  
17 sure of that at this time.

18 Matthew McCullough is a board member,  
19 Wendell Stone is a board member, and Andy Thomas is  
20 a board member currently.

21 Q. Did you ever serve as chair?

22 A. No.

23 Q. Co-chair?

24 A. No.

25 Q. Did you ever have any position on the

1 board other than just a board member?

2 A. No.

3 Q. What were your responsibilities generally  
4 as a member of the Coffee County election board?

5 A. Just a board member.

6 Q. Right. But what does the Coffee County  
7 board do with respect to elections in the county?

8 A. The board basically is in charge of hiring  
9 the supervisor of elections and the assistant  
10 supervisor of elections and making sure they  
11 fulfill their duties and conduct elections and make  
12 sure that people are able to register to vote in  
13 Coffee County.

14 Q. Okay. And do I understand right that the  
15 elections supervisor and the assistant elections  
16 supervisor in Coffee County, they report to the  
17 board?

18 A. They do.

19 Q. Have you served on any other election  
20 boards?

21 A. No.

22 Q. Have you had any other official positions  
23 with respect to Georgia elections?

24 A. No.

25 Q. What did you do, if anything, to prepare

1 for the deposition today?

2 MR. DELK: And I'll instruct the  
3 witness, don't divulge anything that you  
4 and I discussed in our meetings.

5 THE REPORTER: I'm sorry. I don't  
6 know who was speaking.

7 MR. DELK: That was Stephen Delk.

8 THE REPORTER: Okay. Can you restate  
9 that, please?

10 MR. DELK: Sure. I was just  
11 instructing the witness to not divulge  
12 anything from my communications with him,  
13 because that would be privileged  
14 information.

15 But subject to that, you can respond.

16 BY MR. CROSS:

17 Q. So apart from talking with your counsel,  
18 what, if anything, did you do to prepare for today?

19 A. On the advice of counsel, I respectfully  
20 decline to answer on the basis of my rights and  
21 privilege under Article I, Section 1, Paragraph 16  
22 of the Georgia Constitution, the Fifth Amendment of  
23 the United States and Georgia law.

24 As the United States Supreme Court has  
25 stated, privilege against testifying protects

1 everyone, including innocent people, from answering  
2 questions if the truth might be used to help create  
3 a misleading impression that they were somehow  
4 involved in improper conduct.

5 So I hereby follow the advice of my  
6 counsel and respectfully decline to answer.

7 Q. You're taking the Fifth Amendment in  
8 response to a question of what you did to get ready  
9 for today?

10 A. Yes.

11 Q. Okay.

12 MR. CROSS: And Mr. Delk, just for  
13 ease, if he's going to take the Fifth in  
14 response to any other questions, if he  
15 just says Fifth Amendment.

16 MR. DELK: That's fine, as long as we  
17 stipulate that in -- by stating so, it  
18 encompasses the entirety of the statement.

19 MR. CROSS: Yes.

20 MR. DELK: That's agreeable.

21 MR. CROSS: Yeah. Okay. You tell  
22 me.

23 MR. DELK: Moving forward all you  
24 need to do is say "Fifth Amendment," and  
25 it saves you from having to read the whole

1 statement.

2 THE WITNESS: Yes.

3 MR. CROSS: Yeah.

4 (Whereupon, a discussion ensued  
5 off the record.)

6 BY MR. CROSS:

7 Q. All right. Let me hand you what's been  
8 mark -- what's going to be marked as Exhibit 1.

9 MR. CROSS: Mr. Delk, if you want to  
10 take a look at it, it's a copy of the  
11 document subpoena that we -- that my  
12 client served.

13 (Whereupon, Plaintiff's  
14 Exhibit 1 was marked for  
15 identification.)

16 BY MR. CROSS:

17 Q. And sorry, disregard that red X. I wasn't  
18 going to use that particular copy, but it's the  
19 only one we have. Otherwise, it's exactly the  
20 same.

21 A. Sure.

22 Q. But just tell me, do you recognize Exhibit  
23 1?

24 A. Yes.

25 Q. Okay. And so you recognize this as a

1 subpoena that you received in this case to produce  
2 documents?

3 A. Yes.

4 Q. All right. So take -- turn to Page 10, if  
5 you would, where at the top it says Document  
6 Requests. And then you'll see that there's ten  
7 document -- or sorry, 12 document requests that go  
8 to Page 12.

9 Do you see that?

10 A. Yes.

11 Q. Walk me through what you did, if anything,  
12 to collect and produce documents for this subpoena.

13 A. Fifth Amendment.

14 Q. There's nothing at all you're willing to  
15 tell me on that topic; is that right?

16 A. Fifth Amendment.

17 Q. Okay. Do you recall receiving a subpoena,  
18 a separate document subpoena from the other  
19 plaintiffs, the Coalition plaintiffs?

20 A. Fifth Amendment.

21 Q. Can you -- what, if anything, did you do  
22 to collect documents in response to a subpoena that  
23 you received for documents from the other  
24 plaintiffs in this case?

25 A. Fifth Amendment.

1                   (Whereupon, a discussion ensued  
2                   off the record.)

3 BY MR. CROSS:

4           Q.    I'm going to mark that as Exhibit 2.  
5 That's the Coalition subpoena.

6                                   (Whereupon, Plaintiff's  
7                                   Exhibit 2 was marked for  
8                                   identification.)

9 BY MR. CROSS:

10          Q.    Mr. Chaney, do you recognize Exhibit 2 as  
11 a second subpoena you received for documents in  
12 this case?

13                               (Whereupon, the document was  
14                               reviewed by the witness.)

15                   THE WITNESS:   Yes.

16 BY MR. CROSS:

17          Q.    And what, if anything, did you do to  
18 collect documents for that subpoena?

19          A.    Fifth Amendment.

20                               (Whereupon, a discussion ensued  
21                               off the record.)

22                   MR. CROSS:   Let's go off the record  
23 for a second.

24                   THE VIDEOGRAPHER:   We're going off  
25 the record at 10:39.



1 (Whereupon, a discussion ensued  
2 off the record.)

3 THE VIDEOGRAPHER: We are on the  
4 record at 10:43 a.m.

5 (Whereupon, Plaintiff's  
6 Exhibit 3 was marked for  
7 identification.)

8 BY MR. CROSS:

9 Q. All right. Mr. Chaney, I'm going to hand  
10 you Exhibit 3. We'll let Mr. Delk look at it  
11 first.

12 Tell me if you recognize Exhibit 3.

13 (Whereupon, the document was  
14 reviewed by the witness.)

15 THE WITNESS: I do.

16 BY MR. CROSS:

17 Q. Okay. And what is Exhibit 3?

18 A. My response for production of documents.

19 Q. In response to the subpoena served by the  
20 Coalition plaintiffs; right? See where it says  
21 C.G.G.?

22 A. Yes.

23 Q. Okay. And if -- do I understand  
24 correctly, you have not produced any document at  
25 all in response to either of the document subpoenas

1 you received; right?

2 MR. DELK: Object to the form.

3 You can answer if you understand.

4 THE WITNESS: I produced what I have.

5 BY MR. CROSS:

6 Q. Which is nothing?

7 A. I produced what I have.

8 Q. Okay. Walk me through the documents that  
9 you produced in response to the subpoenas.  
10 Describe them for me.

11 MR. DELK: I'll object to the extent  
12 there's a qualifier in one of the  
13 responses about documents by agreement of  
14 counsel regarding any documents that have  
15 been previously produced in the  
16 litigation.

17 But subject to that, he can certainly  
18 respond.

19 BY MR. CROSS:

20 Q. What did you personally produce in  
21 response to the subpoenas, if anything?

22 A. Everything that's here.

23 Q. What does that mean?

24 A. It's pretty cut and dry. It's in black  
25 and white. Everything that's here --

1 Q. Right. And --

2 A. -- is what I produced.

3 Q. Okay. And if we look, in response to one,  
4 you say "none." Right?

5 A. That's correct.

6 Q. Two says "none." Right?

7 A. That's right.

8 Q. In fact, if we go from three to eight,  
9 they all say "none." Right?

10 A. Okay.

11 Q. Meaning you represented you had no  
12 documents to produce in response to any of those  
13 requests; correct?

14 A. That's correct.

15 Q. Then we get to number nine; right?

16 A. Okay.

17 Q. And nine has an objection about  
18 attorney-client privilege and work product. Do you  
19 see that?

20 A. I do.

21 Q. And then it says:

22 "Chaney has no additional  
23 documents of which he is aware to  
24 provide in response to this request  
25 outside of what has been previously

1 provided to Marilyn Marks."

2 Do you see that?

3 A. That's correct.

4 Q. Okay. And you're talking about there  
5 documents that Ms. Marks received from Coffee  
6 County in response to open records requests; right?

7 A. That's correct.

8 Q. Okay. What involvement did you have in  
9 collecting documents for the open records requests  
10 that Ms. Marks served that are referenced there?

11 A. Fifth Amendment.

12 Q. And number ten has the same response;  
13 right?

14 A. That's correct.

15 Q. Number 11 has the same response; right?

16 A. That's correct.

17 Q. So for nine, ten and 11, did you have any  
18 involvement in collecting documents for the open  
19 records requests that are referenced in those  
20 responses?

21 A. Fifth Amendment.

22 Q. Because you have not produced any  
23 documents yourself in response to nine, ten and 11  
24 apart from what might have been included in the  
25 open records productions; right?

1 A. Fifth Amendment.

2 Q. And then when we get to the rest of the  
3 requests, 12 through 27, they all say "none."  
4 Right?

5 A. That's correct.

6 Q. So you represented you had no documents at  
7 all to produce in response to those requests;  
8 correct?

9 A. Yes.

10 Q. And you're not going to tell me anything  
11 about what you did to look for documents in  
12 response to any of these requests; is that right?

13 A. Fifth Amendment.

14 Q. When you received either of the subpoenas  
15 for documents, did you destroy documents that were  
16 responsive to that request?

17 A. Fifth Amendment.

18 Q. Had you previously destroyed documents  
19 responsive to those requests?

20 A. Fifth Amendment.

21 Q. Are you aware that, as a member of the  
22 Coffee County election board of -- election board,  
23 that you have certain legal obligations under  
24 Georgia law to preserve the documents with respect  
25 to county election business?

1 A. Fifth Amendment.

2 Q. Have you complied with that obligation?

3 A. Fifth Amendment.

4 Q. Take a look at request two in Exhibit 3,  
5 if you would, please, on the first page. This one  
6 asks for:

7 "All communications, including  
8 text messages with Misty Hampton  
9 related to, referencing or regarding  
10 Coffee County election matters,  
11 including election records, election  
12 activities or election system  
13 components."

14 Do you see that?

15 A. I do.

16 Q. And Misty Hampton is the -- is a former  
17 elections supervisor in Coffee County; right?

18 A. Correct.

19 Q. And she left in February of 2021; right?

20 A. I don't know the exact date.

21 Q. Does that sound about right?

22 A. I don't know.

23 Q. Well, do you recall that she left in the  
24 spring of 2021?

25 A. I do.

1 Q. Okay. And she served in that position,  
2 was it about nine years?

3 A. I don't know.

4 Q. She was in that position the whole time  
5 you were on the board; right?

6 A. Yes.

7 Q. Okay. And so do I understand right that,  
8 in response to the request number two here, you had  
9 absolutely no documents to provide us that in any  
10 way relate to, or any communications with the  
11 former elections supervisor that in any way relate  
12 to Coffee County election matters?

13 A. That's correct.

14 Q. Even though you're required to preserve  
15 those by law?

16 A. I don't have any documents.

17 Q. When did you destroy those?

18 MR. DELK: Object to the form.

19 BY MR. CROSS:

20 Q. When did you destroy those documents?

21 A. Fifth Amendment.

22 Q. Why did you destroy those documents?

23 A. Fifth Amendment.

24 Q. You destroyed every communication you ever  
25 had with Misty Hampton, even those regarding Coffee

1 County election matters; is that right?

2 A. Fifth Amendment.

3 MR. DELK: Object to the form.

4 BY MR. CROSS:

5 Q. Are you aware that the proceeding we're  
6 test -- you're testifying in today is a civil  
7 proceeding, not a criminal proceeding?

8 A. It's my understanding.

9 Q. Okay. And are you aware that, when a  
10 witness asserts the Fifth Amendment in a civil  
11 proceeding, the Court can infer that the individual  
12 has done what they're being asked about?

13 A. Fifth Amendment.

14 Q. Does that inference concern you?

15 A. Fifth Amendment.

16 MR. DELK: Object to the form.

17 BY MR. CROSS:

18 Q. Do you believe you've committed a crime?

19 A. Fifth Amendment.

20 Q. Mr. Chaney, are you or have you been under  
21 investigation by any federal or state authorities  
22 at any time?

23 A. No.

24 Q. Are you being or have you been called to  
25 testify in any federal or state grand jury



1 proceeding?

2 A. No.

3 Q. Are you or have you received any formal or  
4 informal assurance of immunity from any federal or  
5 state authority?

6 A. Not that I'm aware of.

7 Q. Have you sought immunity?

8 A. No.

9 Q. Have you been charged with a crime  
10 regarding any matter in which you are claiming  
11 Fifth Amendment privilege today?

12 A. No.

13 Q. Has any law enforcement authority  
14 contacted you about any matter on which you're  
15 claiming the Fifth Amendment privilege today?

16 MR. DELK: Object to the form.

17 THE WITNESS: Fifth Amendment.

18 BY MR. CROSS:

19 Q. At all times that you were engaged in any  
20 matter related to the Coffee County election  
21 process or involving Coffee County election  
22 equipment, were you acting in your official  
23 capacity as a member of the Coffee County Board of  
24 Elections?

25 A. I don't understand the form of your

1 question. Can you --

2 Q. Sure.

3 A. -- rephrase that?

4 Q. You have been inside the Coffee County  
5 election office; right?

6 A. Yes.

7 Q. And was there ever a point where you were  
8 inside the Coffee County elections office in any  
9 capacity other than as a member of the board?

10 A. No.

11 Q. Just so I understand, when you're invoking  
12 the Fifth Amendment today, are you doing that on  
13 your personal behalf or on behalf of the Coffee  
14 County Board of Elections?

15 MR. DELK: Object to the form. You  
16 know that's not legally proper to do it on  
17 behalf of the board. And this deposition  
18 is noticed for individual, not a 30(b)(6),  
19 so I object to the entire format of that  
20 question being improper.

21 MR. CROSS: I mean, it seems like  
22 we're agreeing, but I just want to make  
23 sure that he's asserting the Fifth  
24 personally, not on behalf of the board.

25 MR. DELK: He's only providing

1 testimony personally.

2 MR. CROSS: Okay.

3 BY MR. CROSS:

4 Q. Do you disagree with your counsel?

5 A. I do not.

6 Q. Okay.

7 (Whereupon, Plaintiff's  
8 Exhibit 4 was marked for  
9 identification.)

10 BY MR. CROSS:

11 Q. So Mr. Chaney, I've handed you what's been  
12 marked as Exhibit 4. Just take a moment to read  
13 through it, and tell me if you recognize it.

14 (Whereupon, a discussion ensued  
15 off the record.)

16 (Whereupon, the document was  
17 reviewed by the witness.)

18 THE WITNESS: Yes, sir, I do.

19 BY MR. CROSS:

20 Q. And what do you recognize Exhibit 4 as?

21 A. It's just an investigation summary where  
22 there was a complaint -- or complaints filed I  
23 guess through the Secretary of State's office. And  
24 I see the findings and the potential violation on  
25 the back of the page.

1 Q. Okay. So Exhibit 4 is an official summary  
2 from the Secretary of State's office about an  
3 investigation involving Coffee County; is that  
4 fair?

5 A. Yes.

6 Q. And what involvement, if any, did you have  
7 with this investigation?

8 A. None that I recall.

9 Q. So did anybody from the State interview  
10 you as a member of the board?

11 A. Not that I recall.

12 Q. Did anyone from the State provide a report  
13 to any -- to you as a member of the board other  
14 than what's written here?

15 A. Not that I recall.

16 Q. Okay. So if we look at Exhibit 4, look at  
17 complaint two on Page 1. Do you see that?

18 A. I do.

19 Q. And it reads:

20 "A video surfaced on YouTube where  
21 it showed Coffee County election  
22 supervisor Misty Martin discussing the  
23 ways in which the election software  
24 could be manipulated."

25 Do you see that?

1 A. I do.

2 Q. And Misty Martin is the same person as  
3 Misty Hampton?

4 A. Yes.

5 Q. Okay. So we're talking about the, at this  
6 time, the Coffee County election supervisor; right?

7 A. Yes.

8 Q. Okay. And are you familiar with that  
9 YouTube video?

10 A. Yes.

11 Q. You filmed that video; right?

12 A. Fifth Amendment.

13 Q. The video that's referenced there, that  
14 was filmed during an official meeting of the Coffee  
15 County election board in the Coffee County  
16 office -- election office; right?

17 A. Fifth Amendment.

18 Q. All right. Turn to the third page, if you  
19 would. Do you see where it has Findings at the  
20 top?

21 A. Yes, sir.

22 Q. And then Complaint Two referencing that  
23 same complaint. Do you see that?

24 A. Yes.

25 Q. And under the findings here, the State

1 reports:

2 "Ms. Martin, along with Coffee  
3 County Board of Election member Eric  
4 Chaney, made two videos claiming the  
5 Dominion system election software  
6 could be manipulated."

7 Do you see that?

8 A. I do.

9 Q. Do you disa -- dispute that finding?

10 A. Fifth Amendment.

11 Q. It then goes on, if you come to the third  
12 sentence, four lines down in the middle, do you see  
13 where it reads, "Ms. Martin never"?

14 A. I do.

15 Q. And it -- and the finding here is:

16 "Ms. Martin never once during the  
17 videos explained the intended use of  
18 the adjudication process.

19 "The video was very misleading and  
20 seemed its purpose was simply to  
21 create doubt and public mistrust in  
22 the Dominion Voting System."

23 Do you see that?

24 A. Yes.

25 Q. Was it your purpose in creating this video

1 to create doubt and public mistrust in the Dominion  
2 Voting System?

3 MR. DELK: Object to the form.

4 THE WITNESS: Fifth Amendment.

5 BY MR. CROSS:

6 Q. What was the purpose of the video?

7 A. Fifth Amendment.

8 Q. As you sit here, do you have any reason to  
9 believe creating the video was criminal?

10 A. Fifth Amendment.

11 Q. Do you believe that video being released  
12 to the public was criminal?

13 A. Fifth Amendment.

14 Q. If you come down to the second paragraph,  
15 do you see where there's discussion of a password  
16 that was taped to the bottom of the computer screen  
17 Ms. Martin was using?

18 A. Yes.

19 (Whereupon, a discussion ensued  
20 off the record.)

21 (Whereupon, Plaintiff's  
22 Exhibit 5 was marked for  
23 identification.)

24 BY MR. CROSS:

25 Q. I'll hand you Exhibit 5. And just tell me

1 if you recognize Exhibit 5, please.

2 A. Not specifically, I don't.

3 Q. So Exhibit 5 is a screenshot that we took  
4 from the video that's referenced in this complaint  
5 of a Post-It note there and the password.

6 Does that help you recognize what that is?

7 A. I don't -- I mean, I see something there,  
8 but I don't know if it's a password or what it is.

9 Q. Okay. But do you re -- looking at Exhibit  
10 5, do you recall that portion of the video where  
11 there was a screen -- the computer screen in the  
12 elections office that had a Post-It note with some  
13 digits written on it? Do you recall that?

14 A. Fifth Amendment.

15 Q. Okay. In the findings here, the Secretary  
16 of State reports in the last sentence:

17 "It was later discovered the  
18 password was used to access the  
19 Dominion Voting System."

20 Do you see that?

21 A. I do.

22 Q. Do you disagree with that finding?

23 A. Fifth Amendment.

24 Q. Do you know whether that password was used  
25 to access the E.M.S. server computer or if it was



1       instead used to access a particular election  
2       database for the November 2020 election that the  
3       County received on a hard drive from the State?

4           A.     Fifth Amendment.

5           Q.     Did you, yourself, ever log in to the  
6       E.M.S. server desktop in the Coffee County election  
7       office?

8           A.     No.

9           Q.     Do you know what the password was?

10          A.     No.

11          Q.     Do you know if anyone ever changed that  
12       password?

13          A.     I do not.

14                   (Whereupon, a discussion ensued  
15       off the record.)

16                                   (Whereupon, Plaintiff's  
17       Exhibit 6 was marked for  
18       identification.)

19       BY MR. CROSS:

20          Q.     All right. Let me hand you what's been  
21       marked as Exhibit 6.

22                   (Whereupon, the document was  
23       reviewed by the witness.)

24                   THE WITNESS: Okay.

25       BY MR. CROSS:

1 Q. Do you recognize Exhibit 6?

2 A. Yes.

3 Q. And what is it?

4 A. There's quite a bit of information here,  
5 several different things.

6 Q. So let's start with the letter. The cover  
7 letter in Exhibit 6 is a letter that you sent on  
8 behalf of the Coffee County Board of Elections;  
9 right?

10 A. Yes.

11 Q. And you sent that to the House  
12 Governmental Affairs Committee; right?

13 A. Yes.

14 Q. And that was for the state of Georgia  
15 House Governmental Affairs Committee; right?

16 A. Yes.

17 Q. And what was the purpose of you sending  
18 this letter on behalf of the board?

19 A. I feel it's pretty self-explanatory with  
20 the language inside the letter. It gives our  
21 complaints.

22 Q. Well, was the idea to convey to the House  
23 Governmental Affairs Committee concerns that the  
24 Coffee County board had about the reliability of  
25 the Dominion Voting System?

1 MR. DELK: Object to the form.

2 You can answer.

3 THE WITNESS: We had issues in, that  
4 we've noted in this letter that we would  
5 have liked some clarity on and some  
6 guidance from the Secretary of State's  
7 office.

8 BY MR. CROSS:

9 Q. So then why did you send the letter to the  
10 House Governmental Affairs Committee instead of  
11 directly to the Secretary of State's office?

12 A. I think it addresses it here inside the  
13 letter, that we was having some issues and that we  
14 had contacted the Secretary of State's office and  
15 we had had -- you know, we'd not gotten anywhere  
16 with the Secretary of State's office by submitting,  
17 you know, any complaints or calls or so on and so  
18 forth.

19 Q. So the board over some period of weeks or  
20 months had in -- had raised certain concerns with  
21 the Dominion system with the Secretary of State's  
22 office and had not gotten a response; is that  
23 right?

24 A. As I recall.

25 Q. Okay. And so then the board decided to

1 turn to the House Governmental Affairs Committee  
2 for help; is that right?

3 MR. DELK: Object to the form.

4 You can respond unless I --

5 THE WITNESS: Okay.

6 MR. DELK: -- unless I instruct  
7 otherwise.

8 THE WITNESS: That's correct.

9 BY MR. CROSS:

10 Q. Okay. And what was the reason that you  
11 decided to include each of the exhibits to the  
12 letter?

13 A. It's just data. It shows some of our --  
14 some of our issues we was having.

15 Q. Well, how did you think that data would be  
16 helpful to the committee?

17 A. I'm not sure.

18 Q. Do you still have a copy of this letter  
19 yourself?

20 A. I don't.

21 Q. Why not?

22 A. I don't know.

23 (Whereupon, Plaintiff's  
24 Exhibit 7 was marked for  
25 identification.)

1 BY MR. CROSS:

2 Q. All right. Mr. Chaney, handing you what's  
3 been marked as Exhibit 6.

4 MR. DELK: I think we're on seven.

5 MR. CROSS: Are we?

6 (Whereupon, there was unreportable  
7 cross-talk.)

8 MR. CROSS: Yeah. Thank you.

9 Exhibit 7.

10 BY MR. CROSS:

11 Q. And just tell me if you recognize Exhibit  
12 7 as a collection of meeting minutes from the  
13 Coffee County Board of Elections.

14 (Whereupon, the document was  
15 reviewed by the witness.)

16 THE WITNESS: Yes.

17 BY MR. CROSS:

18 Q. And if you would, look on the cover page,  
19 the earliest date on these meeting minutes is  
20 October 6th, 2020; right?

21 A. Yes.

22 Q. And if you go to the second-to-last page,  
23 do you see that the most recent is May 3rd of this  
24 year?

25 A. Yes.

1 Q. Okay. And how often when you were on the  
2 board did the board meet?

3 A. Once a month.

4 Q. Were there ever special meetings?

5 A. I think so, but I don't recall  
6 specifically.

7 Q. Okay. So it met at least once a month?

8 A. That's correct.

9 Q. And what was the purpose of those  
10 meetings?

11 A. We would just discuss board of elections  
12 business and, you know, things that boards discuss  
13 during a meeting.

14 Q. Was there an expectation that the board  
15 meeting minutes would capture all of the topics  
16 that were addressed at those meetings?

17 A. It's my understanding that it would.

18 Q. All right. Turn to the third page. This  
19 is the November 10, 2020 meeting. Do you see that?

20 A. I do.

21 Q. If you look down at number six, do you see  
22 where it says, "Mrs. Martin discussed the general  
23 election results"?

24 A. Yes.

25 Q. And then this captures some of the

1 dialogue in this. And if you come down kind of  
2 towards the middle of the paragraph, you'll see  
3 where it says, "Mr. Chaney expressed his feelings."

4 Do you see that?

5 A. I do.

6 Q. And it says:

7 "Mr. Chaney expressed his feelings  
8 of how the Dominion system 'sickens  
9 him,'" which is in all caps, "of the  
10 possibility of fraud and the deception  
11 that can be manipulated by the  
12 adjudication process.

13 "Mr. Chaney also stated that he  
14 told his state representative that he  
15 was not trying to shoot the messenger,  
16 but the Dominion system he felt was a  
17 piece of junk."

18 Do you see that?

19 A. I do.

20 Q. Do you recall this discussion at the board  
21 meeting?

22 A. Not verbatim, I don't.

23 Q. Okay. But does this generally capture  
24 accurately your feelings at the time?

25 MR. DELK: Object to the form.

1           You've not given him a complete statement  
2           of this document.

3                     But subject to that, you can respond.

4                     THE WITNESS: Fifth Amendment.

5           BY MR. CROSS:

6                     Q.    Do you have a view on the reliability of  
7           Georgia's Dominion Voting System?

8                     A.    Fifth Amendment.

9                     Q.    What was it about the possibility of fraud  
10          with the Dominion Voting System that sickened you?

11                    A.    Fifth Amendment.

12                    Q.    Are you aware of any fraud involving the  
13          Georgia voting system?

14                    A.    Fifth Amendment.

15                    Q.    All right. Turn to the one, January 12th,  
16          2021 meeting minutes. And you see under number one  
17          of the attendees, it says, "absent, Eric Chaney."

18                    Do you see that?

19                    A.    I do.

20                    Q.    Do you recall why you were absent on  
21          January 12th?

22                    A.    I do not.

23                    Q.    Did you make an effort to attend board  
24          meetings?

25                    A.    I did.



1 Q. Okay. And then you get to the next one  
2 here is April 13, 2021. Do you see that?

3 A. I do.

4 Q. Did the board meet in February and March  
5 of that year?

6 A. I don't recall.

7 Q. Is there a reason they would not have met  
8 for two months out of the year?

9 A. I don't recall.

10 Q. Do you know why there are no meeting  
11 minutes for any board meeting in February and March  
12 of 2021?

13 A. I do not. But I would -- I think COVID  
14 could have possibly had a hand in that. I don't --  
15 I'm -- there again, I'm not 100 percent sure. But  
16 those dates strike me as possible dates that may  
17 have been affected by that. But there again, I'm  
18 not 100 percent sure of that.

19 Q. Yeah, and I'm not asking you to speculate.  
20 You don't know why there are no meeting minutes for  
21 those months?

22 A. I don't.

23 Q. Okay. Do you recall that Ms. Hamp --  
24 Misty Hampton and Jil Ridlehoover's employment with  
25 the County ended on February 25th of 2021?

1           A.     There again, I don't recall the exact  
2     date, but I do agree their term did end.

3           Q.     Okay.  And when they signed their letters  
4     of resignation, they did that in separate meetings  
5     with the board; right?

6           A.     Correct.

7           Q.     And did you attend those two meetings?

8           A.     I did.

9           Q.     In the meeting with Ms. Hampton, was she  
10    told that the reason she was being asked to resign  
11    was because her timesheets were inaccurate?

12          A.     That is correct.

13          Q.     And did she admit in that meeting that her  
14    timesheets were inaccurate?

15          A.     I don't recall specifically if she  
16    admitted it or not.

17          Q.     Did she say in that meeting that she had  
18    been directed by members of the board to capture  
19    comp time in the way she submitted her timesheets?

20          A.     I don't recall specifically.

21          Q.     Do you recall personally acknowledging in  
22    that meeting that she had been told to do that?

23          A.     I do not.

24          Q.     You just don't know one way or the other  
25    whether you said that?

1 A. I don't.

2 Q. Well, as you sit here, do you -- are you  
3 aware that she was told by one or more members of  
4 the board to capture comp time in the way she  
5 prepared her timesheets?

6 MR. DELK: Object to the form.

7 THE WITNESS: I'm not.

8 BY MR. CROSS:

9 Q. You're saying you're not aware of that?

10 A. I'm not aware if that was specifically  
11 stated that way.

12 Q. Well, what are you aware of about what was  
13 conveyed to Ms. Hampton about how to capture her  
14 time, her comp time?

15 A. I'm not aware -- I'm not sure exactly.

16 Q. Well, what are you sure of?

17 A. I'm not sure of the way -- the form of  
18 that question, if I can answer correctly, because  
19 I'm not exactly sure of the verbiage that was used,  
20 you know, as telling her how to calculate her time.

21 Q. Okay. So tell me whatever you can about  
22 what Ms. Hampton was told to capture comp time with  
23 respect to her timesheets.

24 A. I'm --

25 MR. DELK: Object to the form.

1 THE WITNESS: I'm not sure. There  
2 again, I don't know how she was told to do  
3 her comp time.

4 BY MR. CROSS:

5 Q. Well, you're not offering a view that she  
6 submitted fraudulent timesheets, are you?

7 A. Yes.

8 Q. You are offering that view?

9 A. I am.

10 Q. Based on what?

11 A. Video evidence that she was not in the  
12 office during office hours that she had written  
13 down that she was present in the office doing  
14 office --

15 Q. But if the additional --

16 A. -- duties.

17 Q. Sorry. Go ahead.

18 A. No, I'm done.

19 Q. But if the additional time on those  
20 timesheets was capturing comp time that she was  
21 owed in accordance with the instructions of the  
22 board, how would that be fraud?

23 MR. DELK: Object to the form.

24 THE WITNESS: There again, I told you  
25 I don't know the specifics of her comp

1 time agreement or what she was to put.

2 But I know that, if you're in the  
3 office from -- if you're putting on your  
4 timesheet that you're in the office from  
5 8:00 to 3:00, that you're in the office is  
6 my opinion. And if you're not there on  
7 video, then you're not in the office.

8 BY MR. CROSS:

9 Q. She was salaried; right?

10 A. Yes.

11 Q. What was her salary?

12 A. I don't know.

13 Q. And she got paid the same salary over the  
14 course of the year; right?

15 A. Yes.

16 Q. So regardless of what she put on her  
17 timesheet, she got paid the same; right?

18 A. Yes, I assume that's right.

19 Q. There was no suggestion to her in that  
20 meeting or at any other time that her timesheets  
21 caused the County to pay her more than she was  
22 owed; right?

23 A. Can you rephrase that again so I can maybe  
24 get a better -- clearer understanding?

25 Q. All right. As a salaried employer, what

1 she put on her timesheets did not affect how much  
2 she got paid; right?

3 A. If she says that she's in the office  
4 performing the duties of her job, then if she's not  
5 there, I think that's -- there's -- in lies the  
6 problem.

7 Q. Right. But regardless of what she puts on  
8 her timesheets, the paychecks she get -- that she  
9 got was always the same; right?

10 A. I'm not sure.

11 MR. DELK: Object to the form.

12 BY MR. CROSS:

13 Q. You just don't know?

14 A. I don't know.

15 Q. Okay. So before you asked her to resign,  
16 it wasn't important to you to figure out whether  
17 she had been authorized to report her timesheets in  
18 the way she did and whether it even affected her  
19 compensation?

20 MR. DELK: Object to the form.

21 THE WITNESS: Her not being at work  
22 when she said she was at work was a big  
23 factor for me.

24 BY MR. CROSS:

25 Q. What was the video evidence that you

1       relied on?

2           A.     Surveillance video from the elections  
3       office.

4           Q.     How many cameras are there in that office?

5           A.     I'm not sure.

6           Q.     How many cameras were in that office at  
7       the time that you looked at the surveillance video?

8           A.     I'm not sure.

9           Q.     Did you actually review the surveillance  
10       video?

11          A.     I did.

12          Q.     How much video was there, for what time  
13       period?

14          A.     I can't recall.

15          Q.     Was it a week? Was it a month? Was it  
16       multiple months?

17          A.     I'm not exactly sure.

18          Q.     Well, can you say it was more or less than  
19       a month?

20          A.     There again, I'm not sure.

21          Q.     Well, did it take you a few minutes to  
22       review it or did it take you hours or did it take  
23       you days?

24          A.     I was shown in just excerpts.

25          Q.     Who showed you excerpts?

1 A. I don't recall.

2 Q. Was it another member of the board?

3 A. There again, I don't recall.

4 Q. Was it counsel for the board, like, Tony  
5 Rowell?

6 A. I do not recall.

7 Q. Where is that video surveillance today?

8 A. I do not know.

9 Q. Would it surprise you to learn that Coffee  
10 County claims it doesn't exist?

11 A. There again, I don't know.

12 Q. Did that video surveillance cover the  
13 month of January 2021?

14 A. I don't know.

15 Q. You don't recall whether you viewed any  
16 video surveillance from the elections county office  
17 from January of 2021?

18 A. I do not.

19 Q. As a former member of the board, do you  
20 have any inside information into why that video  
21 surveillance would have been destroyed?

22 A. Fifth Amendment.

23 Q. Do you recall that, in that meeting on --  
24 in February of 2021, that Ms. Hampton showed up  
25 with a letter of resignation in an envelope?



1 A. I do not remember specifically.

2 Q. Do you have a general memory of that, that  
3 she offered a letter of resignation?

4 A. Yes.

5 Q. And do you recall that Mr. Rowell -- I'm  
6 sorry, do you recall that Tony Rowell rejected that  
7 and insisted that she sign a letter of resignation  
8 that the board had drafted for her?

9 A. I don't recall specifically.

10 Q. Do you have a general memory that that's  
11 how it went?

12 A. I do not.

13 Q. Why don't you tell me everything you  
14 remember about that meeting. Walk me through it.

15 A. Fifth Amendment.

16 Q. In that meeting Mr. Rowell told  
17 Ms. Hampton that, if she didn't sign the  
18 resignation letter that the board had prepared,  
19 that they would fire her and she would lose her  
20 retirement; right?

21 A. Fifth Amendment.

22 Q. The board threatened her; correct?

23 MR. DELK: Object to the form.

24 THE WITNESS: Fifth Amendment.

25 BY MR. CROSS:

1 Q. In that meeting do you recall that she  
2 signed the letter of resignation handed to her by  
3 Mr. Rowell?

4 A. Fifth Amendment.

5 Q. After the board met with her, they met  
6 with Jil Ridlehoover; right?

7 A. That's correct.

8 Q. And you were in that meeting as well;  
9 correct?

10 A. Yes.

11 Q. And did she sign the same letter of  
12 resignation as Ms. Hampton?

13 A. Fifth Amendment.

14 Q. And do I understand correctly that you  
15 said it was a big concern for you that Ms. Hampton  
16 and Ms. Ridlehoover were reporting time in the  
17 office when they were not actually there?

18 MR. DELK: Object to the form.

19 THE WITNESS: I had an issue more  
20 with Misty handling the timecards and  
21 timesheets. Because she was the one, if I  
22 recall correctly, that said she had filled  
23 out the timesheets for she and Jil, and  
24 she had Jil sign the timesheets. And that  
25 was my problem with both employees.

1 BY MR. CROSS:

2 Q. And that was discussed in this meeting?

3 A. If I recall.

4 Q. So you do remember some things from the  
5 meeting?

6 A. Bits and pieces.

7 Q. So even though Ms. Ridlehoover had signed  
8 timesheets that you say were fraudulent, you  
9 shortly thereafter hired her to work for you;  
10 right?

11 A. Fifth Amendment.

12 Q. Well, she does work for you; right?

13 A. Fifth Amendment.

14 Q. Okay. It's public knowledge that  
15 Ms. Ridlehoover works for you; right, sir?

16 MR. DELK: You can answer that  
17 question.

18 THE WITNESS: She does.

19 BY MR. CROSS:

20 Q. So you didn't -- you didn't have enough  
21 concern with her committing fraud to think she was  
22 an unreliable employee; is that fair?

23 A. As I stated before my reasons, Misty had  
24 filled out both timesheets, and my problem was I  
25 had more of an issue with the way Misty had

1 conducted and done what she done that I felt like  
2 Jil was a victim of circumstance.

3 Q. By signing timesheets that you thought  
4 were fraudulent?

5 A. Fifth Amendment.

6 Q. James Barnes replaced Ms. Hampton as the  
7 elections supervisor in Coffee County; right?

8 A. Yes.

9 Q. Do you recall that he began around April  
10 1st of 2021?

11 A. I'm not sure of the exact date, but in  
12 that time frame, yes.

13 Q. Do you know if anyone had access to the  
14 Coffee County election office between the time  
15 Ms. Hampton was let go and the time Mr. Barnes  
16 started?

17 A. I don't. I know I did not.

18 Q. Have you ever heard of Mike Lindell?

19 A. I have.

20 Q. And who is he?

21 A. A guy that does a lot of commercials,  
22 infomercials on TV is all I know.

23 Q. He owns My Pillow; right?

24 A. That's -- I think so.

25 Q. And have you seen any news about

1 Mr. Lindell as associated with former President  
2 Trump?

3 A. Bits and pieces, I have.

4 Q. When was Mr. Lindell in the Coffee County  
5 election office?

6 A. To my knowledge, he's never been in the  
7 elections office.

8 Q. You're not aware of Mr. Lindell being in  
9 Coffee County in around February, late February or  
10 early March 2021?

11 A. No, sir.

12 Q. What about Doug Logan?

13 A. No recollection of the name.

14 Q. You're not aware of Doug Logan being in  
15 the Coffee County election office?

16 A. No.

17 Q. What about Paul Maggio?

18 A. I don't recognize the name.

19 Q. Not aware of him in that office?

20 A. Not that I'm aware of.

21 Q. What about Chris -- sorry. What about  
22 Scott Hall?

23 A. I don't know the name.

24 Q. Not aware of him in that office?

25 A. No, sir.

1 Q. Do you know Robert Sinners?

2 A. I know the name.

3 Q. Who is that?

4 A. Just an attorney in the -- I know the name  
5 of Robert Sinners, but I don't know Robert Sinners.

6 Q. He works for the Secretary of State's  
7 office; right?

8 A. No idea.

9 Q. You don't know Robert Sinners who started  
10 working for the Secretary of State's office in  
11 20 -- February of 2021?

12 A. I do not.

13 Q. Is there a reason why you have his phone  
14 number?

15 A. As I said, I don't know Robert Sinners. I  
16 knew he's an attorney, but I don't -- past that, I  
17 don't know Robert Sinners.

18 Q. Okay. All right. Look at the meeting  
19 minutes from June 8th, 2021.

20 A. Okay.

21 Q. I'm sorry. Before we turn to that, the  
22 video surveillance that you reviewed when  
23 Ms. Hampton was asked to resign, did you see in any  
24 of that video anyone in the Coffee County elections  
25 office that wasn't supposed to be there?

1 A. Fifth Amendment.

2 Q. Was that something that was discussed with  
3 other members of the board or counsel?

4 A. Fifth Amendment.

5 Q. All right. Take a look at the June 8,  
6 2021 minutes. Do you recall this board meeting?

7 A. Not specifically, I do not. No, sir.

8 Q. Do you recall Mr. Barnes reporting to you  
9 or anyone else on the board at any meeting that the  
10 Secretary of State's office had come in and taken  
11 the E.M.S. server and the I.C.C. that had been in  
12 Coffee County?

13 A. I vaguely remember some discussion of  
14 that, but I don't remember any specific  
15 information.

16 Q. Tell me what you remember about that.

17 A. First of all, the terms "I.C.C. scanner"  
18 and -- I mean, all the -- that really doesn't --  
19 that doesn't ring a -- you know, I don't even know  
20 what that is, per se.

21 He just made mention that something was --  
22 some of the equipment wasn't working, he contacted  
23 the Secretary of State's office, as I recall, and  
24 they had come -- I think, if I remember correctly,  
25 they come down, they couldn't get it to work or

1 couldn't figure it out, so they took some  
2 equipment, I'm not sure of what, back with them.

3 Q. And this was a -- this was something that  
4 John -- Mr. Barnes conveyed to the board?

5 A. That's right.

6 Q. And was that at a board meeting?

7 A. I think so.

8 Q. Okay. Do you know why that doesn't appear  
9 in any of the board meeting minutes?

10 A. I do not.

11 Q. Does that surprise you?

12 A. There again, I said I think so. I'm not  
13 100 percent sure that it was conveyed to us in a  
14 board meeting. I don't recall.

15 Q. Well, something as serious as the  
16 Secretary of State's office seizing two major  
17 components of your voting equipment, you'd expect  
18 that to be discussed in a board meeting, wouldn't  
19 you?

20 A. I --

21 MR. DELK: Objection.

22 THE WITNESS: I was never under the  
23 impression that it was seized. I was  
24 under the impression that they replaced  
25 our equipment. That's my understanding.



1 BY MR. CROSS:

2 Q. Replacing, getting new election equipment,  
3 the E.M.S. and the I.C.C., wouldn't you expect that  
4 to be discussed at a board meeting?

5 MR. DELK: Object to the form. Asked  
6 and answered.

7 THE WITNESS: I'm not sure.

8 BY MR. CROSS:

9 Q. Where were the board meetings typically  
10 held?

11 A. Typically, they were held at the Board of  
12 Elections office.

13 Q. So where Misty Hampton's office was?

14 A. That's correct.

15 Q. Okay. And that's the same office where  
16 the E.M.S. server, the I.C.C. and the B.M.D.s were  
17 all stored; right?

18 A. That's correct.

19 Q. So the June 8 --

20 MR. DELK: When we talk about the  
21 board, just for clarification so there's  
22 no confusion about Misty's office, can  
23 we -- the Board of Elections building  
24 perhaps?

25 MR. CROSS: Sure. Yeah. That's

1 fair. I'm not suggesting they're all in  
2 Misty Hampton's office.

3 BY MR. CROSS:

4 Q. But just so we're clear, the board  
5 meetings were typically held in the county  
6 elections office, and there are separate spaces in  
7 that office where some of the equipment is stored;  
8 is that fair?

9 A. That's fair.

10 Q. Okay. And the June 8, 2021 meeting, do  
11 you have any reason to think that that was not held  
12 in the county elections office?

13 A. I don't. I don't recall, but I would  
14 assume that it was held there.

15 MR. DELK: And I'll instruct you,  
16 don't assume. You're under oath. If you  
17 know, answer.

18 MR. CROSS: Yeah.

19 MR. DELK: If you don't, then you  
20 don't know.

21 THE WITNESS: I'm not 100 percent  
22 sure, yes.

23 BY MR. CROSS:

24 Q. Okay. But do you recall having board  
25 meetings at some location other than the county

1 elections office, official board meetings like  
2 this?

3 A. We did hold Zoom board meetings at some  
4 point during the pandemic, but I'm not sure if this  
5 was one of them. I don't know.

6 Q. Right. But June of 2021, a year and a  
7 half into the pandemic, you guys were back in the  
8 office at that point; right?

9 A. I -- it's fair to think so, yes.

10 Q. Okay. Do you recall being in the county  
11 elections office on June 8th for a meeting and  
12 seeing individuals come in from the State to  
13 replace the E.M.S. server?

14 A. I don't.

15 Q. Has anyone ever told you the State claims  
16 to have replaced your server on June 8th?

17 A. Yes.

18 Q. When did you hear that?

19 MR. DELK: I'll object and say don't  
20 divulge any communication with counsel.  
21 But subject to that warning, you may  
22 respond.

23 THE WITNESS: Taking the Fifth.

24 BY MR. CROSS:

25 Q. Okay. Do you know whether the Secretary

1 of State's office actually replaced the E.M.S.  
2 server in Coffee County?

3 A. I don't know specifically.

4 Q. So you don't know for sure whether that  
5 server was actually replaced?

6 A. I'm not say -- I didn't see them do it  
7 physically. So.

8 Q. Okay. What's your understanding of why  
9 the server was replaced?

10 A. Fifth Amendment.

11 Q. What's your understanding of why the  
12 I.C.C. was replaced by the State?

13 A. Fifth Amendment.

14 Q. Did Mr. Barnes ever convey to you or  
15 others on the board any concern that that equipment  
16 had been compromised?

17 A. Fifth Amendment.

18 Q. Are you aware that he testified under oath  
19 that he -- that that was his understanding of why  
20 it was being replaced?

21 A. No, I'm not.

22 Q. Are you aware of anyone ever having  
23 compromised the E.M.S. server in Coffee County?

24 A. Fifth Amendment.

25 Q. Did Mr. Barnes ever say anything to you

1 about the password not working on -- for the E.M.S.  
2 server?

3 A. Not that I recall.

4 Q. So what was your understanding as to why  
5 the server was replaced by the State?

6 A. Fifth Amendment.

7 Q. Did you ever hear from anyone that the  
8 server, the E.M.S. server was no longer accessible  
9 by the password?

10 A. Fifth Amendment.

11 Q. Let me ask a better question. Before the  
12 server was replaced by the State, had you heard at  
13 that time that the password was no longer working?

14 A. Fifth Amendment.

15 Q. Do you know why the password may have  
16 stopped working, assuming that happened?

17 A. Fifth Amendment.

18 Q. Do you know whether anyone at the county  
19 level has the ability to change the password for  
20 the E.M.S. server?

21 A. Fifth Amendment.

22 Q. Do you know if anyone ever changed it?

23 A. Fifth Amendment.

24 Q. All right. Turn to the September 7, 2021  
25 meeting minutes, please. So if you come down to

1 number seven, do you see where it says:

2 "James Barnes said Beau Roberts  
3 from Dominion Voting Systems is  
4 looking into the missing mobile ballot  
5 printer"?

6 Do you see that?

7 A. Yes.

8 Q. What was that about?

9 A. I don't recall.

10 Q. Was there a mobile ballot printer that  
11 Coffee County had that had gone missing?

12 A. I do not recall.

13 Q. So nothing you remember about this?

14 A. No, sir.

15 Q. Why was Beau Roberts of Dominion looking  
16 into a missing printer instead of someone on behalf  
17 of the county or the state?

18 MR. DELK: Object to the form.

19 THE WITNESS: I don't know.

20 BY MR. CROSS:

21 Q. Do you know if it was ever found?

22 A. I don't know.

23 Q. All right. Go to the next month, November  
24 9, 2021. Do you see that?

25 A. Yes, sir.

1 Q. Number nine reads:

2 "Agent Paul Allen is looking into  
3 election fraud that has nothing to do  
4 with the board or elections staff."

5 Do you see that?

6 A. I do.

7 Q. Agent Paul Allen, who is that?

8 A. I don't recall that name.

9 Q. Do you recall whether he was with the  
10 State of Georgia or federal?

11 A. As I said, I don't recall the name.

12 Q. You don't recall anything about who he was  
13 with?

14 A. I do not.

15 Q. What was he looking into with respect to  
16 election fraud?

17 A. I have no idea.

18 Q. There's nothing you can tell me about this  
19 topic?

20 A. I don't recall any of that. I don't  
21 recall who Paul Allen is.

22 Q. If you look at number ten, it reads:

23 "Eric Chaney notified the board  
24 that he had recently moved out of his  
25 commissioner's district.

1           "Upon further research, he  
2           discovered there is no stipulation  
3           that Board of Elections and  
4           registration members must live in the  
5           same district as the person who  
6           appointed them.

7           "He has decided to remain on the  
8           board at least two more years."

9           Do you see that?

10          A.    Yes.

11          Q.    And what was the research that you did at  
12          that time?

13               MR. DELK: I'll object to the extent  
14               it involves any privileged communication  
15               with counsel.

16               But subject to that, you can respond.

17               THE WITNESS: I had made Commissioner  
18               Dovers aware that I had moved, as I  
19               previously stated. And he said he would  
20               be in charge of finding out if I needed to  
21               resign or not.

22               And he got back with me and said that  
23               he had gotten with someone in the county,  
24               I'm not sure of who, and they had said  
25               that I could fulfill the rest of my term



1 on the board.

2 BY MR. CROSS:

3 Q. And that was in November of 2021?

4 A. That's correct.

5 Q. Do you know who Commissioner Dovers  
6 with -- who he spoke with to confirm that you could  
7 remain on the board?

8 A. I do not.

9 And to clarify this, I told them I was  
10 moving out of the district, not moved.

11 Q. Well, it says here:

12 "Eric Chaney notified the board  
13 that he had recently moved..."

14 A. Yes.

15 Q. Right?

16 A. I said I was going to move, that I was --  
17 that is -- I had not formally moved yet.

18 Q. So you're saying that the meeting minutes  
19 are wrong where it says you had already moved?

20 A. Well, I had not moved as of this date. I  
21 was planning on moving earlier, but some did --  
22 I -- well, you couldn't find furniture and so on  
23 and so forth, so it delayed my moving.

24 Q. Until when?

25 A. I don't recall the specific date, but it

1 was after the first of the year.

2 Q. Sometime early in 2021?

3 A. I --

4 MR. DELK: 2022.

5 BY MR. CROSS:

6 Q. Sorry. 2022.

7 Sometime in early 2022?

8 A. Yes.

9 Q. That's when you moved out of the district?

10 A. That's correct.

11 Q. Okay. But in the meeting on December 7,  
12 2021 when you guys approved the meeting minutes,  
13 which you seconded, you didn't tell anyone that  
14 that was inaccurate; right?

15 A. I did not.

16 Q. So in November of last year, you informed  
17 the board that you are moving out of the district.  
18 Commissioner Dovers says no problem, you can finish  
19 out your term for at least two more years.

20 Right?

21 A. That was my understanding.

22 Q. Okay. And then all of a sudden, out of  
23 the blue this past Friday, somebody comes to you  
24 and says, well, that's wrong and you now have to  
25 resign?

1 A. I was called --

2 MR. DELK: Objection. Asked and  
3 answered.

4 THE WITNESS: I was called and he  
5 said that, because of something they -- a  
6 law they had found, that I needed to  
7 resign.

8 BY MR. CROSS:

9 Q. Called by whom?

10 A. Commissioner Dovers.

11 Q. And what was the law that he had found?

12 MR. DELK: Object to the form.

13 THE WITNESS: I don't know.

14 BY MR. CROSS:

15 Q. You resigned your position without  
16 bothering to ask what the law was that they relied  
17 on telling you you had to leave?

18 A. I did.

19 Q. There's nothing you can tell me about the  
20 legal basis for why you left?

21 A. As I said --

22 MR. DELK: Object to the form. Calls  
23 for a legal conclusion. He's a lay  
24 witness.

25 You can respond.

1 THE WITNESS: I don't have any  
2 response.

3 BY MR. CROSS:

4 Q. Tell me everything about -- well, let's  
5 back up.

6 You got a call from Commissioner Dovers on  
7 Friday?

8 A. That's correct.

9 Q. Were you expecting a call from him?

10 A. I was not.

11 Q. Where were you when he called you?

12 A. On a lawnmower mowing the grass.

13 Q. So he called you on your cell?

14 A. He did.

15 Q. And what did he say when he called you?

16 A. As I stated before, that it had been  
17 brought to his attention that, in fact, if you  
18 moved out of the district into another district,  
19 that you could not serve on a board that you were  
20 appointed to by the elected commissioner for their  
21 district.

22 Q. And he said that there was some law that  
23 they had dug up that said that that's -- that's the  
24 rule?

25 A. That's correct.

1 Q. Did you ask him why they didn't find it  
2 when they did the research in November of 2021?

3 A. I mean, I was hot, tired, on a lawnmower,  
4 and I wasn't -- I didn't have a lot of appetite for  
5 getting into any legal jargon with Commissioner  
6 Dovers. I felt like he knew what he was talking  
7 about. So.

8 Q. Well, you felt like he knew what he was  
9 talking about in November when he gave you the  
10 opposite opinion; right?

11 MR. DELK: Object to the form.

12 BY MR. CROSS:

13 Q. Yes?

14 A. I don't know.

15 Q. The commissioner called you up out of the  
16 blue and said that they were taking the complete  
17 opposite position of what he told you they had  
18 researched and confirmed almost a year ago, and you  
19 had no questions for him about it at all?

20 MR. DELK: Object to the form.

21 BY MR. CROSS:

22 Q. Is that your testimony, sir?

23 MR. DELK: Asked and answered.

24 Argumentative.

25 THE WITNESS: I've already answered

1           that.

2       BY MR. CROSS:

3           Q.    You had no questions for him?

4           A.    No questions.

5           Q.    Okay.  And what did you say when he told  
6   you that?

7           A.    Okay.

8           Q.    And you hung up?

9           A.    That's pretty much the basis for our  
10   conversation.

11          Q.    That was the whole conversation?

12          A.    I didn't say it's the whole conversation.  
13   I said that was the basis of our conversation.

14          Q.    What was the rest of the conversation?

15          A.    I don't recall specifically.

16          Q.    Well, tell me what you recall from the  
17   conversation you just had on Friday that was  
18   important enough that you resigned your position on  
19   the board.

20          A.    I already told you.

21          Q.    Tell me the rest of it.

22          A.    I told you.

23          Q.    So the whole conversation was he tells you  
24   I was wrong almost a year ago, you have to quit,  
25   and you said okay and that was it?

1 A. Pretty much.

2 Q. Okay. You say "pretty much." What am I  
3 missing?

4 MR. DELK: Object to the form. Asked  
5 and answered multiple times.

6 You can tell him the same thing if  
7 you need to.

8 THE WITNESS: I've stated what  
9 happened.

10 BY MR. CROSS:

11 Q. What else was said in that call beyond  
12 what you've now disclosed?

13 A. I've disclosed what was said in the call.

14 Q. So he said one thing, you said one thing,  
15 and that was the entirety of the conversation?

16 A. (Whereupon, there was no audible response  
17 by the deponent.)

18 MR. DELK: Object to the form.

19 BY MR. CROSS:

20 Q. "Yes"?

21 A. Pretty much.

22 Q. Well, see, you keep hedging.

23 MR. DELK: He answered your question.

24 BY MR. CROSS:

25 Q. You understand you're on video; right?

1 A. I do.

2 Q. You understand that there's a judge that's  
3 going to watch that video at some point and assess  
4 your credibility; right?

5 A. I do.

6 Q. You understand that video may become  
7 public?

8 A. Sure.

9 Q. Okay. So I'm going to ask you again, tell  
10 me the entirety of the conversation, entirety of  
11 what you and Mr. -- Commissioner Dovers talked  
12 about on Friday, start to finish.

13 MR. DELK: Object to the form.

14 THE WITNESS: I've already --

15 MR. DELK: Asked and answered.

16 THE WITNESS: -- stated that.

17 BY MR. CROSS:

18 Q. So the entirety of the conversation, not  
19 pretty much, not part of it, not some of it, the  
20 entirety of the conversation was he called you up,  
21 said I was wrong almost a year ago, you now have to  
22 leave the board, and you said okay, and that's the  
23 whole conversation?

24 A. That pretty well sums it up.

25 Q. You seem like you want to keep hedging.



1 A. I'm not hedging anything.

2 MR. DELK: Object to the form.

3 You don't have to respond to his  
4 argumentative comments. Wait for a  
5 question.

6 BY MR. CROSS:

7 Q. All right. And you want us to believe  
8 that you leaving the board out of the blue on  
9 Friday has nothing to do with this deposition in  
10 this case.

11 MR. DELK: Object to the form.

12 BY MR. CROSS:

13 Q. Is that right?

14 A. No.

15 Q. You don't want us to believe that?

16 A. It's inaccurate. It's not correct.

17 Q. Okay. And you leaving the board on Friday  
18 had nothing to do with the fact that you let people  
19 come in to the elections office on January 7 of  
20 2021 and access the voting equipment; is that -- is  
21 that your testimony?

22 MR. DELK: Object to the form.

23 THE WITNESS: I've not let anyone  
24 into the elections office. I've never had  
25 a key to the elections office.

1 BY MR. CROSS:

2 Q. Are you testifying that you did not  
3 facilitate access to the elections office on  
4 January 7, 2021 for individuals to access the  
5 voting equipment?

6 A. Fifth Amendment.

7 Q. And are you saying that that had nothing  
8 to do with the fact that you suddenly left the  
9 board on Friday?

10 A. Fifth Amendment.

11 Q. There we go.

12 MR. PICO-PRATS: Can we go off the  
13 record real quick so I can jump to the  
14 restroom?

15 MR. CROSS: Sure. Yeah. Why don't  
16 we take a break. It's a good time.

17 THE VIDEOGRAPHER: Okay. We're going  
18 off the record at 11:44.

19 (Whereupon, a discussion ensued  
20 off the record.)

21 (Whereupon, there was a brief  
22 recess.)

23 THE VIDEOGRAPHER: We're back on the  
24 record at 12:02.

25 BY MR. CROSS:

1 Q. Mr. Chaney, the -- sorry, just to go back,  
2 just to make sure I understand something, the  
3 Coffee County elections supervisor, I think we  
4 covered this before, but that person and their  
5 assistant reports to the Coffee County board;  
6 right?

7 A. Correct.

8 Q. So they take -- they take their direction  
9 from the board members; is that fair?

10 MR. DELK: Object to the form.

11 You can answer.

12 THE WITNESS: Not from the board  
13 members, the board.

14 BY MR. CROSS:

15 Q. From the board?

16 A. Yes.

17 Q. Okay. Do you know Lin Wood?

18 A. Not personally.

19 Q. But you -- you've heard of him?

20 A. Heard the name, yes.

21 Q. Have you ever met him?

22 A. I have not.

23 Q. Has he ever been in the Coffee County  
24 election office to your knowledge?

25 A. Not to my knowledge.

1 Q. Do you know Stephanie Lambert?

2 A. I do not.

3 Q. Do you know if she's ever been in the  
4 Coffee County election office?

5 A. I do not.

6 Q. Do you know Sidney Powell?

7 A. I've heard the name.

8 Q. Have you met her?

9 A. I have not.

10 Q. Do you understand that she represented the  
11 Trump campaign in some election litigation?

12 A. Correct.

13 Q. Did you ever have any communications with  
14 her?

15 A. I did not.

16 Q. Has she ever been in the Coffee County  
17 election office?

18 A. Not to my knowledge.

19 Q. Do you know Patrick Byrne?

20 A. I do not.

21 Q. Ever communicated with him?

22 A. No, sir.

23 Q. Has he ever been in the Coffee County  
24 election office?

25 A. Not to my knowledge.

1 Q. Do you know Ben Cotton?

2 A. I do not.

3 Q. Ever communicated with him?

4 A. Not to my knowledge.

5 Q. Do you know if he's ever been in the  
6 Coffee County election office?

7 A. Not that I know of.

8 Q. Do you have any reason to believe that he  
9 has been?

10 A. As I said, I don't know. I don't know  
11 that he has or has not been.

12 Q. Okay. Do you know Russell Ramsland?

13 A. I do not.

14 Q. Have you ever communicated with him?

15 A. Not that I'm aware of.

16 Q. Do you know whether he's ever been in the  
17 Coffee County election office?

18 A. There again, not that I know of.

19 Q. Do you know Steve Bannon?

20 A. I've heard the name.

21 Q. You understand he worked on the Trump  
22 campaign; right?

23 A. I just know the name. I don't know to  
24 what degree.

25 Q. You don't know whether Steve Bannon worked

1 on the Trump campaign?

2 A. I'm not sure. I think he was something to  
3 do with Trump, but I don't know about campaign or  
4 whatnot.

5 Q. Do you know whether he was ever in the  
6 Coffee County election office?

7 A. I do not.

8 Q. Do you know Doug Franks?

9 A. I don't.

10 Q. Do you know whether he was in the Coffee  
11 County election office?

12 A. I don't.

13 Q. Do you know Cathy Latham?

14 A. I do.

15 Q. And she's the former chair of the G.O.P.  
16 in Coffee County; right?

17 A. Yes.

18 Q. Okay. Fair to say she's been in the  
19 Coffee County election office multiple times;  
20 right?

21 A. I'm not sure how many times, but I'm sure  
22 she's been in there.

23 Q. Well, you've been in that office with her;  
24 right?

25 A. I have seen Cathy in the office, yes.

1 Q. Do you know Greg Freemyer?

2 A. I do not.

3 Q. Do you know whether he's ever been in the  
4 Coffee County election office?

5 A. I do not.

6 Q. Do you know the firm Sullivan Strickler?

7 A. I do not.

8 Q. Never heard of them?

9 A. Not that I recall.

10 Q. I may have asked you this one before.  
11 Sorry if I did. Do you know the name Paul Maggio?

12 A. I do not. You've asked that, but I'm  
13 not -- I don't -- that name doesn't ring a bell.

14 Q. So you don't recall ever meeting him at  
15 any point?

16 A. No, sir.

17 Q. Are you saying you have not met him or you  
18 just don't remember one way or the other?

19 A. I don't recall whether I've met him or  
20 not.

21 Q. Do you know whether Paul Maggio has ever  
22 been in the Coffee County election office?

23 A. I do not.

24 Q. Do you have any reason to believe he has  
25 not been?

1 MR. DELK: Object to the form.

2 THE WITNESS: As I said, I'm not sure  
3 if he has or has not been.

4 BY MR. CROSS:

5 Q. Do you know Jenna Ellis?

6 A. I do not.

7 Q. Ever communicated with her?

8 A. No.

9 Q. Do you know whether she's ever been in the  
10 Coffee County election office?

11 A. I do not.

12 Q. Do you know Jennifer Jackson?

13 A. I do not.

14 Q. Do you know whether she's ever been in the  
15 Coffee County election office?

16 A. I don't.

17 Q. You said earlier you don't know Scott  
18 Hall?

19 A. I don't. I -- the name rings a bell from  
20 open records requests and so on and so forth, but I  
21 don't know him.

22 Q. So you're only -- but your only  
23 familiarity with the name is open records requests  
24 that came in to the county while you were on the  
25 board?



1 A. That's right.

2 Q. I think you said earlier you're not  
3 familiar with Doug Logan?

4 A. I'm not.

5 Q. And you don't know whether he's ever been  
6 in the Coffee County election office?

7 A. No, sir.

8 Q. And you don't know whether Scott Hall's  
9 ever been in that office?

10 A. I'm not sure, no, sir.

11 (Whereupon, a discussion ensued  
12 off the record.)

13 (Whereupon, Plaintiff's  
14 Exhibit 8 was marked for  
15 identification.)

16 BY MR. CROSS:

17 Q. Mr. Chaney, I've handed you what's been  
18 marked as Exhibit 8. Just take your time and  
19 you're welcome to flip through it, read through it  
20 if you need.

21 (Whereupon, the document was  
22 reviewed by the witness.)

23 BY MR. CROSS:

24 Q. Okay. So the exhibit -- the E-mails in  
25 Exhibit 8 are E-mails that were provided to us by

1 counsel for Coffee County in response to an open  
2 records request.

3 Do you -- are you aware of that?

4 A. Yes.

5 Q. Okay. And the E-mail at the top of the  
6 first page is from Jennifer Herzog on April 12th of  
7 2022. Do you see that?

8 A. Yes.

9 Q. And Ms. Herzog is at the firm where  
10 Mr. Delk works; right?

11 A. Correct.

12 Q. So Ms. Herzog, is it your understanding  
13 that she represent -- she's counsel for Coffee  
14 County?

15 A. Yes.

16 Q. Does she also represent you personally or  
17 no?

18 A. Not that I'm aware of.

19 Q. Okay. And so there's an E-mail thread  
20 here we're going to talk through here in a little  
21 bit. She forwards that on to Ryan Germany at the  
22 Secretary of State's office on April 12th of this  
23 year; right?

24 A. Yes.

25 Q. And do you know Ryan Germany?

1 A. I do not.

2 Q. Are you aware that he is the general  
3 counsel in the Secretary of State's office?

4 A. I'm not.

5 Q. Never heard of Ryan German?

6 A. No, sir.

7 Q. So you've never spoken with him, never  
8 communicated with him; right?

9 A. No, sir.

10 Q. And then she copies Anthony Rowell, which  
11 is another attorney for Coffee County; right?

12 A. That's right.

13 Q. And that's the Tony Rowell we talked about  
14 earlier that was in the meeting with Ms. Hampton  
15 when she was let go?

16 A. Right.

17 Q. Okay. Now, if we -- if you come to the  
18 bottom of the second page of the E-mail thread, or  
19 really look in the middle, do you see there's an  
20 E-mail from Emma Brown at the Washington Post?

21 A. I do.

22 Q. And she sends that E-mail at 5:00 in the  
23 morning on April 12th of 2022; right?

24 A. Yes.

25 Q. And she sends it to Wesley Vickers at

1 Coffee County?

2 A. Yes.

3 Q. Who's Wesley Vickers?

4 A. He is the county manager or comptroller, I  
5 would -- I would say. I'm not sure of his exact  
6 title, but.

7 Q. What is his relationship, if any, with the  
8 Coffee County Board of Elections?

9 A. I'm not sure.

10 Q. And then Ms. Brown also contacted  
11 Mr. Rowell and Ms. Herzog. Do you see that?

12 A. I do.

13 Q. And the subject is Time Sensitive  
14 Washington Post Inquiry. Do you see that?

15 A. Yes.

16 Q. And then you see in the first paragraph  
17 she writes:

18 "As you know from my previous  
19 inquiries to each of you, I have been  
20 reporting on the claim that  
21 businessman Scott Hall arranged after  
22 the 2020 election to ferry a team of  
23 people to Coffee County where he says  
24 in a recorded phone call that they  
25 made copies of Dominion election

1 equipment with permission from local  
2 elections officials."

3 Do you see that?

4 A. I do.

5 Q. And you were one of the local elections  
6 officials that gave permission for that; right?

7 MR. DELK: Object to the form.

8 THE WITNESS: Fifth Amendment.

9 BY MR. CROSS:

10 Q. Ms. Brown then goes on:

11 [As read] "The County's former  
12 election supervisor Misty Hampton  
13 (previously Martin) told me that Scott  
14 Hall did visit her office with other  
15 people after she reached to someone on  
16 the 'federal level' seeking help"  
17 investigating -- "seeking help  
18 investigate the election."

19 Do you see that?

20 A. I do.

21 Q. She then goes on:

22 "She said she did not remember how  
23 many people or who they were or when  
24 they visited or what they did. She  
25 said Eric Chaney was present with her

1           and she did nothing without his  
2           knowledge."

3                     Do you see that?

4           A.     I do.

5           Q.     And that's a true statement, right, that  
6           you were present when this happened and you knew  
7           what was going on?

8           A.     Fifth Amendment.

9           Q.     Ms. Brown then writes:

10                    "Hampton said the group passed  
11           through the locked door between the  
12           building foyer and the election  
13           department, which she described as an  
14           area off limits to the general public  
15           but a place where non-county employees  
16           such as candidates, anyone seeking to  
17           meet with her, even her mother, could  
18           go and did go."

19                    Do you see that?

20           A.     I do.

21           Q.     She then goes on:

22                    "She also said that, while she was  
23           sure that Hall and the team he brought  
24           did not enter a locked room housing  
25           the touch screen voting machines, she

1 did not know whether they entered the  
2 room housing the E.M.S. server as that  
3 room was often unlocked during the day  
4 and she wasn't watching their every  
5 move."

6 Do you see that?

7 A. I do.

8 Q. But you are aware that that team did, in  
9 fact, enter the room with the E.M.S. server;  
10 correct?

11 A. Fifth Amendment.

12 Q. You're aware that they connected hard  
13 drives to that equipment and copied it; right?

14 A. Fifth Amendment.

15 Q. You're aware that they brought in a  
16 borrowed scanner and copied cast ballots; right?

17 A. Fifth Amendment.

18 Q. You're aware that Cathy Latham provided  
19 that scanner; right?

20 A. Fifth Amendment.

21 Q. She borrowed that scanner from her church,  
22 did she not?

23 A. Fifth Amendment.

24 Q. When did she return it to the church?

25 A. Fifth Amendment.

1 Q. So then if we come up, Ms. Herzog sends  
2 Ms. Brown's E-mail to you the same day and writes:

3 "Eric, we received the below  
4 correspondence at 5:05 a.m. Please  
5 give Tony Rowell and myself a call as  
6 soon as possible to discuss."

7 Do you see that?

8 A. I do.

9 Q. And then later that afternoon, you write  
10 back to Ms. Herzog in an E-mail. Do you see that?

11 A. I do.

12 Q. And you write:

13 "I do not know Scott Hall..."

14 Right?

15 A. That's correct.

16 Q. That was a lie; right?

17 MR. DELK: Object to the form.

18 THE WITNESS: No.

19 BY MR. CROSS:

20 Q. That was not a lie?

21 A. That was not a lie.

22 Q. Okay. And you write:

23 "I do not know Scott Hall, and to  
24 my knowledge I am not aware of nor was  
25 I present at the Coffee County Board



1 of Elections and registration's office  
2 when anyone illegally accessed the  
3 server or the room in which it is  
4 contained."

5 Do you see that?

6 A. I do.

7 Q. Everything you wrote in that sentence was  
8 a lie; right?

9 MR. DELK: Object to the form.

10 THE WITNESS: Fifth Amendment.

11 BY MR. CROSS:

12 Q. Is it your position that, when Scott Hall  
13 and others came in and accessed the voting  
14 equipment in Coffee County in January of 2021, that  
15 that was legal?

16 A. Fifth Amendment.

17 Q. Do you dispute that it was illegal?

18 A. Fifth Amendment.

19 Q. Did the board authorize that?

20 A. Fifth Amendment.

21 Q. Did you authorize that?

22 A. Fifth Amendment.

23 Q. Did Ms. Hampton authorize that?

24 A. Fifth Amendment.

25 Q. If you come down to the middle of your

1 E-mail, do you see the sentence that begins "I have  
2 no knowledge whether"?

3 A. I do.

4 Q. And you wrote to Ms. Herzog:

5 "I have no knowledge whether or  
6 not Misty allowed anyone without  
7 authorization to access the server  
8 room (which remains locked). And  
9 because of the layout of the elections  
10 office, which is very small, you have  
11 to walk through Misty's office to  
12 access that room.

13 "Therefore, it is highly unlikely,  
14 if not impossible, for her not to know  
15 who did or did not enter the server  
16 room."

17 Do you see that?

18 A. Yes.

19 Q. You then go on:

20 "I have no personal knowledge that  
21 anyone without authorization accessed  
22 the server room..."

23 Do you see that?

24 A. Yes.

25 Q. That was a lie; right?

1 MR. DELK: Object to the form.

2 THE WITNESS: No.

3 BY MR. CROSS:

4 Q. So that's a true statement, that you have  
5 no personal knowledge that anyone without  
6 authorization accessed the server room?

7 A. Fifth Amendment.

8 Q. Well, is it a lie or is it a true  
9 statement?

10 A. Fifth Amendment.

11 Q. Well, you just said it's not a lie.

12 A. Fifth Amendment.

13 Q. Okay. And you go on in that same sentence  
14 to say that you also have no "knowledge of any  
15 other statements or allegations in Ms. Brown's  
16 letter."

17 Do you see that?

18 A. That's correct.

19 Q. That also was a lie; right?

20 A. Fifth Amendment.

21 MR. DELK: Object to the form.

22 BY MR. CROSS:

23 Q. And you wrote this E-mail specifically for  
24 the purpose of Ms. Herzog providing it as the  
25 response to the Washington Post inquiry; right?

1 A. Correct.

2 Q. Did you convey the truth of what happened  
3 to your counsel or did you lie to your counsel,  
4 too?

5 MR. DELK: Object to the form.

6 That's privileged.

7 THE WITNESS: Fifth Amendment.

8 BY MR. CROSS:

9 Q. Why did you write this dishonest E-mail in  
10 response to the inquiry from the Washington Post?

11 MR. DELK: Object to the form. Asked  
12 and answered.

13 THE WITNESS: Fifth Amendment.

14 BY MR. CROSS:

15 Q. In the days leading up to January 7 of  
16 2021, you reached out to Misty Hampton and asked if  
17 she'd be willing to work with folks to get access  
18 to the voting equipment in her elections office;  
19 right?

20 MR. DELK: Object to the form.

21 THE WITNESS: Fifth Amendment.

22 BY MR. CROSS:

23 Q. You had multiple conversations with her  
24 about that; right?

25 A. Fifth Amendment.

1 Q. You told her specifically that one of  
2 those individuals would be a man named Scott Hall;  
3 right?

4 A. Fifth Amendment.

5 Q. Cathy Latham was one of the key  
6 individuals who helped organized this with Scott  
7 Hall; right?

8 A. Fifth Amendment.

9 Q. You and Ms. Latham worked together to  
10 organize this; correct?

11 A. Fifth Amendment.

12 Q. On the morning of January 7, 2021, you  
13 were aware that Scott Hall and others arrived in  
14 the Coffee County election office specifically for  
15 the purpose of copying ballots and copying data  
16 from the voting equipment; right?

17 A. Fifth Amendment.

18 Q. Did you send any text messages about that?

19 A. Fifth Amendment.

20 Q. Do you use Signal?

21 A. Fifth Amendment.

22 Q. It's incriminating whether you use Signal  
23 at all?

24 A. Fifth Amendment.

25 Q. I take it you use Signal only to commit

1 crimes?

2 A. Fifth Amendment.

3 MR. DELK: Object to the form.

4 BY MR. CROSS:

5 Q. You were in the Coffee County elections  
6 office on January 7, 2021 yourself; right?

7 A. Yes.

8 Q. Ms. Latham was also there; right?

9 A. Fifth Amendment.

10 Q. You were there when Scott Hall walked into  
11 the door; right?

12 A. Fifth Amendment.

13 (Whereupon, Plaintiff's  
14 Exhibit 9 was marked for  
15 identification.)

16 BY MR. CROSS:

17 Q. All right. Mr. Chaney, I've handed you  
18 what's been marked as Exhibit 9. Take a moment to  
19 read through it. But do you recognize that these  
20 are text messages that you exchanged with Misty  
21 Hampton?

22 (Whereupon, the document was  
23 reviewed by the witness.)

24 THE WITNESS: I recognize this as a  
25 text thread, but I'm not -- I mean, I

1           can't testify to them.

2       BY MR. CROSS:

3           Q.     Text thread with Misty Hampton?

4           A.     Fifth Amendment.

5           Q.     All right. Do you see at the bottom  
6       there's pagination 24 pages, if you look on the  
7       bottom right corner?

8           A.     Yes, sir.

9           Q.     Go to Page 12 of 24 in the text thread  
10       with Ms. Hampton. You see the date November 12th,  
11       2020 --

12          A.     Yes.

13          Q.     -- 10:08 p.m.?

14                 And she wrote to you:

15                   "Did you like that post? Was that  
16       okay?"

17                   You said: "I did. Very good."

18                   She writes: "Thank you."

19                   Do you see that?

20          A.     I do.

21          Q.     Do you recall what this was about, what  
22       this post was about?

23          A.     Fifth Amendment.

24          Q.     Okay. And then you write back:

25                   "Thanks for your hard work."

1           She says: "Thank you for all your  
2           help."

3           You say: "It has not gone  
4           unnoticed."

5           She says: "Thank you."

6           Do you see that?

7           A.    I do.

8           Q.    And your view was that Ms. Hampton, at  
9           least before the issue of the timesheets arose, she  
10          did a good job managing the elections office;  
11          right?

12          A.    Fifth Amendment.

13          Q.    Whether Ms. Hampton did a good job is  
14          potentially incriminating to you?

15               MR. DELK: Object to the form.

16               THE WITNESS: Fifth Amendment.

17          BY MR. CROSS:

18          Q.    Then in -- just stay with me, because  
19          we're going to flip through this. Go to Page 13.  
20          On November 13, 2020, she sent you a picture of a  
21          ballot that had two Q.R. codes.

22               Do you remember that?

23          A.    Fifth Amendment.

24          Q.    Do you recall during your time as a member  
25          of the Coffee County board that the Dominion system



1 sometimes would generate ballots from the B.M.D.s  
2 that had more than one Q.R. code?

3 A. Fifth Amendment.

4 Q. Was that an issue that you or anyone in  
5 the County to your knowledge raised with the State?

6 A. Fifth Amendment.

7 Q. And if you look down at the bottom, she  
8 also sent a picture of a ballot that she said was  
9 missing some of the races that were supposed to be  
10 on that ballot.

11 Do you see that?

12 A. I do.

13 Q. Do you recall that being a concern that  
14 you or others had with the -- in Coffee County with  
15 the voting system?

16 A. Fifth Amendment.

17 Q. Was that a concern that you or others on  
18 the board raised with the State?

19 A. Fifth Amendment.

20 Q. All right. Come to November 17. This is  
21 the top of Page 15. Do you see that?

22 A. Yes.

23 Q. And so on November 17, 2020 at 1:55, she  
24 sends you a postal -- a U.S. postal receipt. Do  
25 you see that?

1 A. Yes.

2 Q. What was that for?

3 A. Fifth Amendment.

4 Q. Then on November 19, 2020, do you see that  
5 you exchanged some texts with her at 5:19 p.m.?  
6 Are you with me there?

7 A. Yes, I'm there.

8 Q. And then you wrote to her:

9 "Do you have the election bulletin  
10 from the Secretary of State office  
11 about how the audit had proved the  
12 machines reliable and that Notes  
13 should certify the original numbers?"

14 Do you see that text?

15 A. I do.

16 Q. She writes back:

17 "I will go back on Firefly and  
18 find them."

19 Do you see that?

20 A. Yes.

21 Q. And then you respond:

22 "E-mail them to me, please.  
23 Trump's man wants them."

24 Do you see that?

25 A. I do.

1 Q. Who is Trump's man?

2 A. Fifth Amendment.

3 Q. Why did somebody associated with former  
4 President Trump want something from Coffee County,  
5 Georgia?

6 MR. DELK: Object to the form.

7 THE WITNESS: Fifth Amendment.

8 BY MR. CROSS:

9 Q. Do you know the name Jesse Binnall,  
10 B-I-N-N-A-L-L?

11 A. I don't.

12 Q. Have you ever communicated with him?

13 A. Not to my knowledge.

14 Q. Are you aware that he is one of Trump's  
15 personal lawyers?

16 A. I'm not.

17 Q. So you indicate:

18 "Trump's man wants them."

19 She writes: "Okay."

20 Then you write:

21 "They're after the S.O.S. and

22 GOV."

23 Do you see that?

24 A. I do.

25 Q. And you're referring to the Secretary of

1 State Raffensperger and Governor Kemp; right?

2 A. Fifth Amendment.

3 Q. Ms. Hampton responds:

4 "Good," with four exclamation  
5 points. "I'll help them any way I  
6 can."

7 And then you respond:

8 "Me, too."

9 Do you see that?

10 A. I do.

11 Q. Why did you have to help Trump's man,  
12 whoever that was, go after Secretary Raffensperger  
13 and Governor Kemp?

14 A. Fifth Amendment.

15 Q. Why did you want to help Trump's man do  
16 anything?

17 A. Fifth Amendment.

18 Q. Did you believe what you were doing to  
19 help Trump's man was a crime?

20 A. Fifth Amendment.

21 Q. Do you believe that now?

22 A. Fifth Amendment.

23 Q. Is whatever you were doing in this text  
24 the subject of any criminal investigation to your  
25 knowledge?

1 A. Fifth Amendment.

2 MR. DELK: Object to the form.

3 BY MR. CROSS:

4 Q. And then you come down, you see December  
5 1st, 2020, 11:10 a.m.?

6 A. Yes.

7 Q. And you sent her a screenshot from Amazon.  
8 Do you see that?

9 A. That's correct.

10 Q. And what you had just purchased on Amazon  
11 is a digital voice recorder. Do you see that?

12 A. That's correct.

13 Q. Why did you purchase a digital voice  
14 recorder?

15 A. We use a recorder in the board meetings to  
16 record. We did have a cassette recorder, but we  
17 went to a digital recorder.

18 Q. And so that was purchased to record the  
19 board meetings?

20 A. That's correct.

21 Q. And are the board meetings typically  
22 recorded in that way?

23 A. That's correct.

24 Q. Do you have any reason to believe that  
25 those recordings no longer exist?

1 A. I'm not sure.

2 MR. CROSS: Mr. Delk, since your firm  
3 also represents Coffee County, we need  
4 those produced, please.

5 MR. DELK: We'll take that up  
6 following the deposition.

7 MR. CROSS: Okay.

8 BY MR. CROSS:

9 Q. Then if you come to the top of the next  
10 page, December 1st, 2020, do you -- sorry, just  
11 flip the page. Or did you already flip? Oh, yeah,  
12 you're there. I'm sorry.

13 The top of that page, December 1st, you  
14 sent Ms. Hampton contact information for someone  
15 named Tyler Harper. Do you see that?

16 MR. DELK: Object to the form.

17 You can respond.

18 THE WITNESS: Which page are you on  
19 now?

20 BY MR. CROSS:

21 Q. Top here. Do you see Tyler Harper?

22 A. I do.

23 Q. Who is Tyler Harper?

24 A. He's a senator for district eight in  
25 Georgia.

1 Q. Why did you send Tyler Harper's contact  
2 information to Misty Hampton on December 1st of  
3 2020?

4 A. That's not a phone number.

5 Q. Well, it's a V.C.F. That's how you  
6 forward contact information; right?

7 A. I'm not sure.

8 Q. Well, do you know why you would -- why you  
9 sent contact information for Tyler Harper to  
10 Ms. Hampton?

11 A. Fifth Amendment.

12 Q. And she responds:

13 "Tell me who a good lawyer would  
14 be for that."

15 What was that about?

16 A. Fifth Amendment.

17 Q. And in this thread, you say to her:

18 "Did you get Tyler's contact  
19 info?"

20 She writes:

21 "Yes, it left him off, but I just  
22 did a new one with him in it."

23 What's she talking about there?

24 A. Fifth Amendment.

25 Q. She then writes:

1           "Just hope I don't get fired for  
2           it. L.O.L."

3           You wrote:

4           "You won't," with an exclamation  
5           point.

6           Do you see that?

7           A. Fifth Amendment.

8           Q. What was she doing that might get her  
9           fired?

10          A. Fifth Amendment.

11          Q. Why were you confident she would not get  
12          fired?

13          A. Fifth Amendment.

14          Q. Were you confident she would not get fired  
15          by virtue of your position on the board?

16          A. Fifth Amendment.

17          Q. And then if you come down, still on  
18          December 1st of 2020, do you see you sent her a  
19          text that says:

20                 "Do you still have those lawyers'  
21                 E-mails?"

22          Do you see that?

23          A. I do.

24          Q. What lawyers?

25          A. Fifth Amendment.



1 Q. She writes: "I do."

2 You write: "E-mail them in the morning."

3 What was it you wanted her to E-mail them  
4 about?

5 A. Fifth Amendment.

6 Q. Then on December 2nd of 2020 at 7:14 p.m.,  
7 she writes to you:

8 "Trump is going to be in Valdosta  
9 Sunday afternoon."

10 Do you see that?

11 A. I do.

12 Q. She writes below that:

13 "So who do we know that can get us  
14 Calle of talking to him?"

15 Do you see that?

16 A. I do.

17 Q. And then you write:

18 "Dominic's buddy. Russ Goodman."  
19 Right?

20 A. I do.

21 Q. Who's Russ Goodman?

22 A. Fifth Amendment.

23 Q. Who's Dominic?

24 A. Fifth Amendment.

25 Q. Why did you think that Dominic or Russ

1 Goodman could get any of you guys access to Trump  
2 at this time?

3 A. Fifth Amendment.

4 Q. So December 4th of 2020, top of the next  
5 page, 10:33 a.m., do you see that?

6 A. Yes.

7 Q. Ms. Hampton writes to you:

8 "I am sitting here with Tony  
9 Rowell. And after him looking at the  
10 numbers from the recount, he suggests  
11 that we do not certify.

12 "The certification is supposed to  
13 be done by noon today. We have  
14 drafted a letter to be sent to the  
15 State, so I was going to see if you  
16 can sign a letter."

17 Do you see that?

18 A. I do.

19 Q. Then later that day she writes:

20 "You busy?"

21 Do you see that?

22 A. Yes.

23 Q. Then on December 8, 2020 at 2:36 p.m., she  
24 writes:

25 "Why is he scared?"

1 Do you see that?

2 A. I do.

3 Q. And you write back:

4 "Pussy."

5 A. I do.

6 Q. Who are you referring to?

7 A. Fifth Amendment.

8 Q. Are you referring to Tony Rowell?

9 A. Fifth Amendment.

10 Q. She then questions:

11 "You have a signed copy?"

12 And you say: "Yes."

13 Do you see that?

14 A. I do.

15 Q. Signed copy of what?

16 A. Fifth Amendment.

17 Q. She then writes: "Okay."

18 And you write: "I want you there."

19 Right? Are you with me?

20 A. I see.

21 Q. You wanted her where?

22 A. Fifth Amendment.

23 Q. What was it you wanted her to do?

24 A. Fifth Amendment.

25 Q. She then writes:

1 "Good. Are you going to be here  
2 with Ed and Robert Preston?"

3 Do you see that?

4 A. I do.

5 Q. Who's Robert Preston?

6 A. He is a local journalist that owns Douglas  
7 Now -- represents Douglas Now. I don't know if he  
8 owns it.

9 Q. Was Robert Preston involved with the  
10 YouTube video that we talked about earlier where  
11 Ms. Hampton showed how the adjudication system  
12 worked, was he involved in that getting on the  
13 Internet?

14 A. Fifth Amendment.

15 MR. DELK: Object to the form.

16 BY MR. CROSS:

17 Q. And Ed, is that Ed Voyles?

18 A. I don't know.

19 Q. Well, she wrote she was going to be here  
20 with Ed and Robert Preston, and you responded:

21 "Yes."

22 Right?

23 MR. DELK: Object to the form.

24 THE WITNESS: I can't speculate for  
25 Misty.

1 BY MR. CROSS:

2 Q. No. I understand that. But just so we're  
3 clear we're reading the same thing, she writes:

4 "Are you going to be here with Ed  
5 and Robert Preston?"

6 You respond: "Yes."

7 Right?

8 A. That's correct.

9 Q. Okay. You didn't ask her who Ed was?

10 A. I did not.

11 Q. Well, do you have any reason to think it's  
12 someone other than Ed Voyles?

13 A. There again, I can't speculate on Misty's  
14 behalf.

15 Q. Okay. Ed Voyles is a former member of the  
16 Coffee County elections board; right?

17 A. He was.

18 Q. Was he a chairman at one point?

19 A. I'm not sure.

20 Q. Ed Voyles was in the election office for  
21 some portion of January 7th of 2021 right?

22 A. Fifth Amendment.

23 Q. So then on December 8, 2020, later that  
24 same day we were just looking at, 9:44 p.m., you  
25 wrote to Ms. Hampton:

1 "Think we can get James to give a  
2 statement?"

3 Do you see that?

4 A. I do.

5 Q. Who is James?

6 A. Fifth Amendment.

7 Q. And then she responds:

8 "No, he does not want to be  
9 involved."

10 You respond:

11 "That's going to hold us up."

12 She writes:

13 "I don't think so. I really do  
14 not know if he is a legal citizen."

15 Do you see that?

16 A. I do.

17 Q. And when you said, "that's going to hold  
18 us up," hold what up?

19 MR. DELK: Object to the form.

20 THE WITNESS: Fifth Amendment.

21 BY MR. CROSS:

22 Q. Is James, whoever he is, is that a -- is  
23 he a legal citizen?

24 A. Fifth Amendment.

25 Q. You then write back:

1 "All we need is a written  
2 statement."

3 Do you see that?

4 A. I do.

5 Q. A written statement for what?

6 A. Fifth Amendment.

7 Q. A written statement about what?

8 A. Fifth Amendment.

9 Q. A written statement by whom?

10 A. Fifth Amendment.

11 Q. What can you tell me about the written  
12 statement that you said you needed?

13 A. Fifth Amendment.

14 Q. Who was the written statement for?

15 A. Fifth Amendment.

16 Q. Then the next day, December 9, 2020, 9:27  
17 a.m., you write -- I'm still at the bottom of the  
18 page. I'm sorry. She -- Ms. Hampton writes:

19 "Does Wendell think he is going to  
20 change the vote to not go tomorrow?"

21 You write back:

22 "I'm about to puss this joker  
23 off."

24 Do you see that?

25 A. I do.

1 Q. What was the vote that was being discussed  
2 there?

3 A. Fifth Amendment.

4 Q. Then on December 10th, 20:20, 4:09 p.m.,  
5 she writes to you:

6 "Dominic is pissed and he is  
7 trying to call you."

8 Do you see that?

9 A. I do.

10 Q. The next day at 12:12 p.m., you write:

11 "Send me T.J.'s number."

12 Do you see that?

13 A. I do.

14 Q. Who is T.J.?

15 A. I'm not sure. Fifth Amendment.

16 Q. And you see she sends you:

17 "T.J. V.C.F."

18 Do you see that?

19 A. Yes.

20 Q. So as you sit here, you don't know who  
21 T.J. was?

22 A. Fifth Amendment.

23 Q. All right. Then come down to the top of  
24 the next page. You see it's dated December 30,  
25 2020 at 4:00 p.m.?



1 A. Yes, sir.

2 Q. And there are three screenshots of poll  
3 pads, three photos of poll pads that Ms. Hampton  
4 sent you. Do you see that?

5 A. Yes.

6 Q. And on the first one she shows that the  
7 poll pad is accessing Netflix; right?

8 A. Yes.

9 Q. And on the second one, she shows that the  
10 poll pad is accessing, what is she -- what is that?  
11 Do you know what that is? Some sort of games?

12 MR. DELK: Object to the form.

13 THE WITNESS: I'm not sure.

14 BY MR. CROSS:

15 Q. One of the things that Ms. Hampton had  
16 raised as a concern with you and others was that  
17 the poll pads used in Georgia are connected to the  
18 Internet; right?

19 A. That's correct.

20 Q. And you're aware that -- well, back up.

21 Ms. Hampton's daughter also worked for the  
22 County; right?

23 A. She did.

24 Q. She helped with elections?

25 A. She was employed part-time with the

1 County.

2 Q. And you're aware that, during at least one  
3 election, Ms. Hampton's daughter was able to use a  
4 poll pad to watch Netflix during the election;  
5 right? Ms. Hampton conveyed that to you?

6 A. Fifth Amendment.

7 Q. Then if you come down to the bottom,  
8 there's still -- just so you can see, we're still  
9 on December 30 of 2020. That spills over to the  
10 top of Page 20, and there's an additional photo.

11 So this is still December 30. Do you see  
12 that?

13 A. Yes.

14 Q. And there's a card game that's depicted on  
15 a computer screen in that one; right?

16 A. Yes.

17 Q. And here Ms. Hampton wrote to you:

18 "This is the computer that the  
19 I.C.C. scanner is connected to."

20 Right?

21 MR. DELK: Object to the form.

22 THE WITNESS: Fifth Amendment.

23 BY MR. CROSS:

24 Q. And then she sends you another photo. Do  
25 you see that below?

1 A. Yes.

2 Q. And there she writes:

3 "This is the E.M.S. server  
4 computer."

5 Do you see that?

6 A. Fifth Amendment.

7 Q. Then on December 31 of 2020 at 7:46 p.m.,  
8 you wrote to her:

9 "Did you get the letter sent?"

10 Do you see that?

11 A. Yes.

12 Q. What letter?

13 A. Fifth Amendment.

14 Q. Sent to whom?

15 A. Fifth Amendment.

16 Q. About what?

17 A. Fifth Amendment.

18 Q. For what purpose?

19 A. Fifth Amendment.

20 Q. Who wrote it?

21 A. Fifth Amendment.

22 Q. What was your involvement?

23 A. Fifth Amendment.

24 Q. Who else was involved?

25 A. Fifth Amendment.

1 Q. She responds to you:

2 "No. I am going to finish it  
3 tomorrow."

4 Do you see that?

5 A. I do.

6 Q. And then you responded with an E-mail  
7 address for Preston Haliburton. Do you see that?

8 A. I do.

9 Q. Why did you give her Preston Haliburton's  
10 E-mail address?

11 A. Fifth Amendment.

12 Q. Okay. Are you aware that Mr. Haliburton  
13 represents Cathy Latham?

14 A. Fifth Amendment.

15 Q. All right. Come to Page 22 of 24. If you  
16 come down in the middle, do you see there's a text  
17 January 6th of 2021 at 4:26 p.m.?

18 A. I do.

19 Q. And on that day, Ms. Hampton wrote to you:

20 "Scott Hall is on the phone with  
21 Cathy about wanting to come scan our  
22 ballots from the general election like  
23 we talked about the other day. I am  
24 going to call you in a few."

25 Do you see that?

1 A. I do.

2 Q. "Cathy" refers to Cathy Latham; right?

3 A. Fifth Amendment.

4 Q. So you were aware, at least as of January  
5 6th of 2021, that Scott Hall was coming in to the  
6 Coffee County election office at least to access a  
7 copy, to scan ballots; right?

8 A. Fifth Amendment.

9 Q. So when you testified earlier that your  
10 only familiarity with Scott Hall was through an  
11 open records request, that was a lie; right, sir?

12 MR. DELK: Object to the form.

13 THE WITNESS: Fifth Amendment.

14 BY MR. CROSS:

15 Q. Are you aware that lying under oath is a  
16 felony?

17 A. Fifth Amendment.

18 Q. Do you know who Javier represents?

19 A. I do.

20 Q. The Secretary of State's office; right?

21 A. I do.

22 Q. Do you understand the Secretary of State's  
23 office has a lawyer sitting in this room in which  
24 you just lied?

25 MR. DELK: Object to the form.

1 BY MR. CROSS:

2 Q. Right?

3 A. Fifth Amendment.

4 Q. She then writes back later that same day,  
5 8:54 p.m.:

6 "I found out tonight that there is  
7 another way to change the ballots in  
8 R.T.R."

9 Do you see that?

10 A. I do.

11 Q. What's R.T.R.?

12 A. I don't know.

13 Q. And you write back: "What?"

14 She writes: "Yelp."

15 You say: "How?"

16 She says: "I found a manual on Dominion."

17 And then you say: "Wow."

18 Do you see that?

19 MR. DELK: Object to the form.

20 THE WITNESS: I do.

21 BY MR. CROSS:

22 Q. What was this other way to change ballots?

23 A. I'm not sure.

24 Q. Then on January 7, 2021, 10:18 a.m., she  
25 writes to you:

1 "Hey, are you coming to the  
2 office? I need a board member to be  
3 here when we transfer ballots."

4 Do you see that?

5 A. I do.

6 Q. Why did a board member need to be there to  
7 transfer ballots?

8 A. Fifth Amendment.

9 Q. And by "transfer ballots," she's talking  
10 about copying the ballots for Scott Hall and  
11 others; right?

12 MR. DELK: Object to the form.

13 THE WITNESS: Fifth Amendment.

14 BY MR. CROSS:

15 Q. And you wrote:

16 "I'll be there at 11:00."

17 Right?

18 A. I did.

19 Q. And you don't dispute that you were in the  
20 Coffee County election office on January 7, 2021;  
21 right?

22 A. Fifth Amendment.

23 Q. And when you were in the office that day,  
24 you saw Scott Hall come in with others right?

25 A. Fifth Amendment.

1 Q. And you don't dispute that Ms. Latham was  
2 in the office that day; right?

3 A. Fifth Amendment.

4 (Whereupon, Ms. Curling joined the  
5 deposition.)

6 BY MR. CROSS:

7 Q. You don't dispute that Jil Ridlehoover was  
8 in the office that day; right?

9 A. Fifth Amendment.

10 Q. If you come to the top of the next page,  
11 January 7 of 2021 at 7:24 p.m., you send a phone  
12 number to Ms. Hampton.

13 Do you see that?

14 A. I do.

15 Q. Whose phone number is that?

16 A. I don't know.

17 Q. Why did you send her that number?

18 A. I don't know.

19 Q. Nothing you can tell me about that phone  
20 number?

21 A. Fifth Amendment.

22 Q. That phone number is for Robert Sinners,  
23 S-I-N-N-E-R-S; right?

24 A. I'm not sure.

25 Q. You sent a phone number to Ms. Hampton on



1 January 7, 2021 and you have no idea whose number  
2 it is?

3 A. Fifth Amendment.

4 Q. I'm going to ask you again, Mr. Chaney.  
5 You are aware that that phone number is registered  
6 to Robert Sinners; right?

7 A. Fifth Amendment.

8 MR. DELK: Object to the form.

9 BY MR. CROSS:

10 Q. What was Mr. Sinners' involvement in a  
11 team coming into the Coffee County elections office  
12 on January 7, 2021 to copy ballots and copy  
13 proprietary data off of the Dominion voting  
14 equipment?

15 MR. DELK: Object to the form.

16 THE WITNESS: Fifth Amendment.

17 BY MR. CROSS:

18 Q. Did you personally communicate with  
19 Mr. Sinners?

20 A. Fifth Amendment.

21 Q. Were you asking Ms. Hampton to communicate  
22 with Mr. Sinners about those events?

23 A. Fifth Amendment.

24 Q. Who in the Secretary of State's office to  
25 your knowledge was aware of what happened on

1 January 7th, 2021 involving Mr. Hall and Mr. Maggio  
2 and others?

3 A. Fifth Amendment.

4 MR. DELK: Object to the form.

5 BY MR. CROSS:

6 Q. When did they become aware?

7 A. Fifth Amendment.

8 Q. Immediately after you send her this phone  
9 number, you write to her:

10 "Let's switch to Signal."

11 Right?

12 A. Fifth Amendment.

13 Q. Well, it's written here in front of us. I  
14 mean, we can get that much right. You wrote to  
15 her:

16 "Let's switch to Signal."

17 Right?

18 MR. DELK: Object to the form. Asked  
19 and answered.

20 THE WITNESS: Fifth Amendment.

21 BY MR. CROSS:

22 Q. You wanted to switch to Signal because you  
23 wanted to make sure you could delete the messages  
24 you guys were exchanging; right?

25 A. Fifth Amendment.

1 Q. Maybe if you'd thought of that sooner, we  
2 wouldn't have all these texts, would we?

3 A. Fifth Amendment.

4 MR. DELK: Object to the form.

5 BY MR. CROSS:

6 Q. Thought of it a little bit too late.

7 MR. DELK: Argumentative.

8 Don't -- you don't have to respond.

9 That's not even a question.

10 BY MR. CROSS:

11 Q. I gathered from going through the document  
12 requests earlier where you wrote "denied" that you  
13 have no responsive Signal messages to produce to  
14 us; is that right?

15 A. Fifth Amendment.

16 Q. In fact, you've recently told people  
17 associated with the Coffee County board that you  
18 deleted those messages; right?

19 MR. DELK: Object to the form.

20 THE WITNESS: Fifth Amendment.

21 BY MR. CROSS:

22 Q. On January 8th of 2021 at 11:52 a.m., she  
23 writes to you:

24 "Did you check Signal?"

25 Right?

1 A. That's right.

2 Q. And then she says:

3 "Call you in just a minute."

4 Do you recall, do you remember talking to  
5 her that morning?

6 A. Fifth Amendment.

7 Q. The team of individuals who came in to  
8 copy ballots and the voting equipment, they were  
9 still in the office doing that on January 8th  
10 right?

11 A. Fifth Amendment.

12 Q. On January 12th of 2021 at 2:56 p.m., she  
13 sends you a handwritten note with the name Bob and  
14 then Chris Linscheid, L-I-N-S-C-H-E-I-D.

15 Do you see that?

16 A. I do.

17 Q. Who is Chris Linscheid?

18 A. I don't know.

19 Q. And she includes a phone number. Do you  
20 see that?

21 A. I do.

22 Q. Why did she send you those?

23 A. I don't know.

24 MR. DELK: Object to the form.

25 BY MR. CROSS:

1 Q. Nothing you can tell me about that?

2 A. Fifth Amendment.

3 Q. Did you ever communicate with Chris  
4 Linscheid?

5 A. Fifth Amendment.

6 Q. Did you ever call that number?

7 A. Fifth Amendment.

8 Q. Do you know if those individuals are  
9 involved in copying ballots and voting equipment in  
10 Coffee County?

11 MR. DELK: Object to the form.

12 THE WITNESS: Fifth Amendment.

13 BY MR. CROSS:

14 Q. On January 15, 2021 at 5:08 p.m., she  
15 wrote to you:

16 "Do you have Snapchat? Signal is  
17 down," with an exclamation point.

18 Do you see that?

19 A. I do.

20 Q. Did you use Snapchat?

21 A. Fifth Amendment.

22 Q. Did you communicate with her or others on  
23 Snapchat about individuals copying ballots and  
24 voting equipment?

25 A. Fifth Amendment.

1 Q. She then writes to you on January 19, 2021  
2 at 10:35 a.m.:

3 [As read] "If you happen to be in  
4 town, the guys measuring my desk are  
5 still" there -- "are still here."

6 Do you see that?

7 A. I do.

8 Q. That was a code that you and Ms. Hampton  
9 worked out regarding individuals being in the  
10 office copying voting equipment; right?

11 MR. DELK: Object to the form.

12 THE WITNESS: Fifth Amendment.

13 BY MR. CROSS:

14 Q. There was no one there actually measuring  
15 her desk; isn't that right?

16 A. Fifth Amendment.

17 Q. Because not only did individuals copy  
18 voting equipment on January 7, but they came back,  
19 some of the same people and some different people  
20 came back on the 19th to do some additional  
21 copying; right?

22 MR. DELK: Object to the form.

23 THE WITNESS: Fifth Amendment.

24 BY MR. CROSS:

25 Q. Doug Logan was there on January 19, wasn't

1 he?

2 A. Fifth Amendment.

3 Q. Did you guys agree to use code "measuring  
4 my desk" to hope that it would conceal that what  
5 you were doing was criminal?

6 MR. DELK: Object to the form.

7 THE WITNESS: Fifth Amendment.

8 BY MR. CROSS:

9 Q. Then the next day on January 20, 2021,  
10 6:47 p.m., she writes:

11 "Do you have a high capacity  
12 scanner in your office?"

13 Do you see that?

14 A. What's the date again?

15 Q. January 20, 2021, 6:47 p.m.

16 A. I do.

17 Q. And she was asking you for the scanner  
18 because she was still scanning ballots from the  
19 November 2020 election for this team of  
20 individuals; right?

21 MR. DELK: Object to the form.

22 THE WITNESS: Fifth Amendment.

23 BY MR. CROSS:

24 Q. You're aware that Misty Hampton helped  
25 scan ballots from the November 2020 election from

1 January 7 of 2021 until January 27th of 2021?

2 MR. DELK: Object to the form.

3 THE WITNESS: Fifth Amendment.

4 BY MR. CROSS:

5 Q. Some of those ballots were scanned on this  
6 scanner that Ms. Latham provided from her church;  
7 right?

8 A. Fifth Amendment.

9 Q. Did you provide her a high pass -- high  
10 capacity scanner for that purpose?

11 A. Fifth Amendment.

12 Q. If you come down, you'll see on January  
13 7th -- January 27, 2021 at 9:23 a.m., she writes to  
14 you:

15 "I took care of the people  
16 measuring my desk."

17 Do you see that?

18 A. I do.

19 Q. That was her way of letting you know that  
20 she had sent the ballots on a flash drive; right?

21 MR. DELK: Object to the form.

22 THE WITNESS: Fifth Amendment.

23 BY MR. CROSS:

24 Q. Where did she send those ballots?

25 A. Fifth Amendment.



1 Q. Were you the one who told her where to  
2 send those ballots?

3 A. Fifth Amendment.

4 Q. Who wanted the ballots?

5 A. Fifth Amendment.

6 Q. Why did they want them?

7 A. Fifth Amendment.

8 Q. Were any of the ballots or other  
9 information that was taken from the voting  
10 equipment in Coffee County provided to Robert  
11 Sinners?

12 A. Fifth Amendment.

13 Q. Turn to the last page. Do you see on  
14 February 27, 2021, 9:00 a.m., you wrote to her:

15 "You're welcome. I wish you the  
16 best. Use your knowledge to get  
17 ahead"?

18 Do you see that?

19 A. I do.

20 Q. And she writes:

21 "T.J. is coming Wednesday to have  
22 lunch and meet some people if you  
23 would like to join."

24 You respond:

25 "Okay. If I'm in town, I'll try

1 to come."

2 Do you see that?

3 A. I do.

4 Q. Who is T.J.?

5 A. I do not recall.

6 Q. When you referred earlier to "Trump's  
7 man," were you referring to Robert Sinners?

8 A. Fifth Amendment.

9 (Whereupon, Plaintiff's  
10 Exhibit 10 was marked for  
11 identification.)

12 BY MR. CROSS:

13 Q. All right. Let me hand you what's been  
14 marked as Exhibit 10. Take your time to read  
15 through it for a moment if you need to.

16 MR. BROWN: This is Bruce Brown. I  
17 did not catch the answer to the last  
18 question as to whether Sinners was Trump's  
19 man referenced in the prior text. I just  
20 did not hear the -- if he answered it or  
21 not.

22 MR. CROSS: I think it was "Fifth  
23 Amendment," but Debra can confirm.

24 Yeah. Yeah.

25 MR. BROWN: Thank you very much.

1           Sorry for the interruption.

2                       (Whereupon, the document was  
3           reviewed by the witness.)

4                       THE WITNESS:   Okay.

5   BY MR. CROSS:

6           Q.    So have you had a chance to flip through  
7   Exhibit 10?

8           A.    Yes.

9           Q.    Have you seen this before?

10          A.    I have not.

11          Q.    Okay. All right. So let's talk a little  
12   bit about this. Come to -- the E-mails work from  
13   the back to the front in chronological order like  
14   most do. Come to three pages from the end. You'll  
15   see a November 30, 2020 E-mail at 7:10 p.m. from  
16   Jim Penrose, bottom of the right-hand page.

17               MR. DELK:  When you say the page, are  
18   you talking about whole pages? Because  
19   they're front and back copied.

20               MR. CROSS:  Yeah. Yeah.

21               MR. DELK:  What was the date and time  
22   again?

23               MR. CROSS:  November 30, 2020.

24               MR. DELK:  Okay.

25   BY MR. CROSS:

1 Q. So Jim Penrose at [REDACTED] sends an  
2 E-mail addressed to Paul and Greg. Do you see  
3 that?

4 A. Yes.

5 Q. And do you know Jim Penrose?

6 A. I do not.

7 Q. Never communicated with him?

8 A. No, sir.

9 Q. He writes to Paul and Greg:

10 "Thanks so much for jumping onto  
11 this opportunity in Nevada. I am  
12 connecting you with the lead attorney  
13 in Nevada, Jesse Binnall, along with  
14 Brian Kennedy," there's a phone  
15 number, "to ensure we get the  
16 engagement letter in place for  
17 tomorrow's forensic activities."

18 Do you see that?

19 A. Yes.

20 Q. It goes on on the top of the next page:

21 "From our side, Doug Logan will be  
22 joining you and flying out there with  
23 you. Your P.O.C. on the ground Nevada  
24 is Todd from our team."

25 Do you see that?

1 A. I do.

2 Q. And then if you come down, it says:

3 "Todd, the Sullivan Strickler

4 P.O.C. for the flight is Paul Maggio.

5 The Sullivan Strickler team lead is

6 Greg Freemyer."

7 Do you see that?

8 A. Yes.

9 Q. Do you know what this is about?

10 A. I do not.

11 Q. Okay. If you come up, Jesse Binnall from  
12 Harvey Binnall responds to that E-mail on November  
13 30, 2020. Do you see that? Middle of the previous  
14 page.

15 A. This next page?

16 Q. Go back, here.

17 A. Okay.

18 Q. And if you look at this E-mail,  
19 Mr. Binnall writes to Jim Penrose. Do you see  
20 that?

21 A. Yes.

22 Q. And then included and copied, do you see  
23 Abigail Frye from the same firm as Mr. Binnall?

24 A. I do.

25 Q. Then there's B-R-I-T-R-A-V at

1 [REDACTED]. Do you see that?

2 A. I do.

3 Q. Do you know who that is?

4 A. I don't.

5 Q. Then you see there's an E-mail for Doug  
6 Logan?

7 A. Yes.

8 Q. An E-mail for Greg Freemyer at Sullivan  
9 Strickler?

10 A. Uh-huh.

11 Q. "Yes"?

12 A. I do.

13 Q. And then we see Lin Wood; right?

14 A. That's right.

15 Q. Then we see Paul Maggio; right?

16 A. Yes.

17 Q. Phil Waldron at [REDACTED], do you see  
18 that?

19 A. Yes.

20 Q. Then Sidney Powell at [REDACTED],  
21 do you see that?

22 A. Yes.

23 Q. And you see the subject line of the E-mail  
24 here is Urgent in all caps, Nevada Forensics  
25 Engagement?

1 A. I do.

2 Q. All right. So come up now, the next  
3 E-mail at the bottom of the previous page is from  
4 Greg Freemyer at Sullivan Strickler, on November  
5 30, 2022 -- sorry, 2020 at 11:57 p.m.

6 Do you see that?

7 A. I do.

8 Q. And then come up, the next E-mail we see  
9 is on December 1st of 2020 at 4:09 a.m. from Paul  
10 Maggio. Are you with me?

11 A. I do.

12 Q. And he writes:

13 "Attached is the engagement  
14 agreement for the Nevada work as well  
15 as the possible Georgia work."

16 Do you see that?

17 A. I do.

18 Q. Do you know what that's about?

19 A. I don't.

20 Q. All right. Come to -- I'm sorry. They're  
21 not numbered. It would be a lot easier. But flip  
22 four pages, like, whole pages in to the document  
23 from the front and you'll see an E-mail from Jesse  
24 Binnall on December 5th of 2020.

25 Yeah. Yeah. So here on December 5th of

1 2020, Jesse Binnall writes to Paul Maggio and some  
2 other individuals. Are you with me?

3 A. Yes.

4 Q. And he writes:

5 "I don't have any authority  
6 regarding Michigan. Who is your  
7 campaign contact there?"

8 Do you see that?

9 A. I do.

10 Q. Do you know whether "campaign" refers to  
11 the Trump campaign?

12 A. I don't.

13 MR. DELK: Object to the form.

14 BY MR. CROSS:

15 Q. And Mr. Binnall is responding to an E-mail  
16 on December 5th, 2020 at 6:32 p.m. from Paul  
17 Maggio. Do you see that immediately below?

18 A. Yes.

19 Q. And Mr. Maggio wrote to Jesse Binnall:

20 "Good evening. The Sullivan  
21 Strickler team has arrived in Antrim  
22 County, Michigan and will be on-site  
23 at 9:00 a.m. tomorrow."

24 Do you see that?

25 A. I do.



1 Q. And you're aware that there is evidence  
2 that individuals went in and copied, had access to  
3 voting equipment in Antrim County, Michigan on or  
4 around this time?

5 A. I'm not.

6 Q. And below that it also says:

7 "It is our assumption that we will  
8 be working under our existing  
9 agreement and maintain the same daily  
10 rate/conditions of the signed document  
11 for Nevada."

12 Do you see that?

13 A. I do.

14 Q. So what we have here are E-mails produced  
15 by Mr. Maggio indicating that his firm, Sullivan  
16 Strickler, was engaged to do forensic work on  
17 voting equipment in Antrim County, Michigan;  
18 Nevada; and possibly Georgia.

19 Are you with me?

20 A. Okay.

21 Q. And do you still maintain that you don't  
22 know who Paul Maggio is?

23 A. That's correct.

24 Q. Okay. Are you familiar with the R.I.C.O.  
25 statute?

1 A. I'm not.

2 Q. Do you know what a R.I.C.O. crime is?

3 A. Fifth Amendment.

4 Q. So then if you come forward in the next  
5 page, do you see the December 6th, 2020 E-mail from  
6 Paul Maggio?

7 A. I do.

8 Q. Right here. This side.

9 A. Okay.

10 Q. And here he writes:

11 "Since we have already begun work  
12 in Antrim County, Michigan, it would  
13 be best for all parties if we have a  
14 signed agreement in place. Attached  
15 is an engagement agreement."

16 Do you see that?

17 A. Yes.

18 Q. Then Jim Penrose responds to that, look at  
19 the bottom of the next page, December 6th, 2020 at  
20 1:49 p.m. -- sorry, going in that direction.

21 Do you see that bottom over here?

22 A. Okay.

23 Q. Mr. Penrose responds to Paul Maggio,  
24 including Sidney Powell and Doug Logan. Do you see  
25 that at the bottom?

1 A. I do.

2 Q. And Mr. Penrose writes:

3 "Here is the signed E.L. from  
4 Sidney Powell, Defending the  
5 Republic."

6 Do you see that?

7 A. I do.

8 Q. Next paragraph:

9 "Please do not communicate about  
10 any additional forensics work in  
11 Arizona to the other legal teams.  
12 Keep that in confidential channels  
13 with me, Sidney and Doug only."

14 Do you see that?

15 A. I do.

16 Q. And do I understand correctly, you  
17 maintain you've never communicated with Sidney  
18 Powell?

19 A. That's correct.

20 Q. Never communicated with Doug Logan?

21 A. That's correct.

22 Q. Were you aware that they were involved in  
23 an effort to access voting equipment in states  
24 around the country?

25 A. Fifth Amendment.

1 Q. Were you aware that they were involved in  
2 efforts to access voting equipment in Coffee County  
3 in or around January of 2021?

4 A. Fifth Amendment.

5 Q. All right. Flip another page ahead. Do  
6 you see in the middle of the page an E-mail from  
7 Paul Maggio on December 8th of 2020?

8 MR. DELK: What time?

9 MR. CROSS: 3:52 p.m., here.

10 MR. DELK: Okay.

11 THE WITNESS: I do.

12 BY MR. CROSS:

13 Q. And here Mr. Maggio writes:

14 "Jim, per our discussion, we will  
15 upload the system files from the  
16 election management server collected  
17 from Antrim County, Michigan to a  
18 secure Sharefile site."

19 Do you see that?

20 A. I do.

21 Q. Were you aware that Mr. Maggio's firm had  
22 taken files from an election management server in  
23 Antrim County?

24 A. I was not.

25 Q. Were you aware that they put them on the

1 Internet?

2 A. No.

3 Q. Were you aware that they took the data  
4 from Coffee County that they copied on January 7  
5 and January 8, maybe January 19, put that on the  
6 Internet as well?

7 A. Fifth Amendment.

8 Q. Sidney Powell responds, if you come up, on  
9 December 8 -- up here. It should be up there.  
10 Yep.

11 Hold on. Are we on the same page?

12 MR. DELK: What's the time and date?

13 BY MR. CROSS:

14 Q. Yeah, here. Sidney Powell responds to the  
15 December 8 E-mail from Paul Maggio we just looked  
16 at, she responds the same day at 4:01 p.m.

17 Do you see that?

18 A. I do.

19 Q. And she writes:

20 "Nevada must be paid by the  
21 campaign."

22 Do you see that?

23 A. I do.

24 Q. Do you know whether that refers to the  
25 Trump campaign?

1 A. I do not.

2 Q. She also indicates:

3 "I have seen none of that  
4 information. I am authorizing payment  
5 today for Michigan."

6 Do you see that?

7 A. I do.

8 Q. Do you know whether the Trump campaign  
9 paid for the individuals who went in to Coffee  
10 County on or around January 7, 2021 to copy ballots  
11 and copy the voting equipment there?

12 MR. DELK: Object to the form.

13 THE WITNESS: Fifth Amendment.

14 BY MR. CROSS:

15 Q. Then if you come to -- keep going forward,  
16 you see an E-mail at the bottom here from Sidney  
17 Powell on December 21 of 2020?

18 A. I do.

19 Q. And she writes to Paul Maggio and others.  
20 Do you see that?

21 A. Yes.

22 Q. You see Doug Logan's on that as well?

23 A. Yes.

24 Q. And someone Tricia at [REDACTED].

25 Do you see that?

1 A. I do.

2 Q. And here she writes:

3 "Copying Tricia with instructions  
4 to transfer money promptly with  
5 understanding that I and Phil Waldron  
6 and Todd and Conan will receive a copy  
7 of all data immediately and have  
8 access to all information needed  
9 immediately to complete their  
10 assessment. And a complete copy of  
11 all analysis you do is to be given to  
12 us as well."

13 Do you see that?

14 A. I do.

15 Q. Do you know Phil Waldron?

16 A. I do not.

17 Q. Ever communicated with him?

18 A. Not to my knowledge.

19 Q. Do you know who Todd is here?

20 A. I do not.

21 Q. Do you know who Conan is here?

22 A. I do not.

23 Q. Were you aware that, when you helped give  
24 access to Scott Hall, Paul Maggio and others on  
25 January 7th, 2021 into Coffee County, that that was

1 part of a broader initiative to breach voting  
2 equipment across the country?

3 A. Fifth --

4 MR. DELK: Object to the form.

5 THE WITNESS: Fifth Amendment.

6 BY MR. CROSS:

7 Q. All right. Now come to the top of this  
8 page. You're there. Do you see the E-mail still  
9 in the same thread, Paul Maggio writes on January  
10 7, 2021 to Sidney Powell.

11 Do you see that?

12 A. I do.

13 Q. 10:31 a.m.; right?

14 A. Yes.

15 Q. Doug Logan's included on that; right?

16 A. Yes.

17 Q. Jim Penrose is on that; right?

18 A. That's right.

19 Q. And the subject line now says Coffee  
20 County, Georgia Forensics Engagement Agreement.  
21 Are you with me?

22 A. Yes.

23 Q. And Mr. Maggio writes to Sidney Powell:

24 "Per Jim Penrose's request, we are  
25 on our way to Coffee County, Georgia



1 to collect what we can from the  
2 election/voting machines and systems."

3 Do you see that?

4 A. I do.

5 Q. And you see in the next sentence he  
6 indicates that they are doing this "per our  
7 existing agreement." Do you see that?

8 A. I do.

9 Q. And do you still maintain that you don't  
10 know Paul Maggio and he wasn't in the office that  
11 day when you were there January 7 of 2021?

12 A. Fifth Amendment.

13 Q. Now come to the first page. Later that  
14 same day, January 7, 2021, Paul Maggio E-mails  
15 Sidney Powell and others at 4:10 p.m. Do you see  
16 that?

17 A. Yes.

18 Q. And he writes:

19 "Everything is going well here in  
20 Coffee County, Georgia."

21 Do you see that?

22 A. I do.

23 Q. And everything went well in Coffee County,  
24 Georgia because you and Ms. Hampton were there to  
25 help; right?

1 MR. DELK: Object to the form.

2 THE WITNESS: Fifth Amendment.

3 BY MR. CROSS:

4 Q. You organized their trip with Ms. Hampton;  
5 right?

6 MR. DELK: Object to the form.

7 THE WITNESS: Fifth Amendment.

8 BY MR. CROSS:

9 Q. You organized their trip to Coffee County  
10 with Ms. Latham; right?

11 A. Fifth Amendment.

12 Q. Who else did you organize it with?

13 A. Fifth Amendment.

14 Q. Then on January 8, 2021, the most recent  
15 E-mail is from Paul Maggio to Sidney Powell and  
16 others at 3:48 p.m. Do you see that?

17 A. I do.

18 Q. So we're on January 8, 2021, and  
19 Mr. Maggio writes:

20 "Sidney, everything went smoothly  
21 yesterday with the Coffee County  
22 collection. Everyone involved was  
23 extremely helpful."

24 Do you see that?

25 A. I do.

1 Q. That included you; right?

2 MR. DELK: Object to the form.

3 THE WITNESS: Fifth Amendment.

4 BY MR. CROSS:

5 Q. He then writes:

6 "We are consolidating all of the  
7 data collected and will be uploading  
8 it to our secure site for access by  
9 your team."

10 Do you see that?

11 A. I do.

12 Q. Were you aware at the time that you let  
13 these people come in to collect data that they were  
14 going to put it on the Internet?

15 A. Fifth Amendment.

16 Q. Do you think that's a secure way to manage  
17 a voting system?

18 A. Fifth Amendment.

19 Q. Do you have any concerns about what that  
20 means for the reliability of the voting system  
21 going forward?

22 A. Fifth Amendment.

23 Q. Did you think what you were doing was  
24 legal?

25 A. Fifth Amendment.

1 Q. Did you think you were helping the  
2 republic?

3 A. Fifth Amendment.

4 Q. Do you think you were serving your duty  
5 under the Constitution?

6 A. Fifth Amendment.

7 Q. Or were you doing it for the money?

8 A. Fifth Amendment.

9 Q. Did you get paid?

10 A. Fifth Amendment.

11 Q. Did you receive anything of value in  
12 exchange for letting folks in to the Coffee County  
13 office to do this?

14 A. Fifth Amendment.

15 MR. DELK: Object to the form.

16 BY MR. CROSS:

17 Q. Turn to the very last page of this  
18 document, please. Do you see there's an invoice  
19 here from Sullivan Strickler?

20 A. I do.

21 Q. And you see it's billed to Sidney Powell.  
22 Do you see that?

23 A. I do.

24 Q. And you see it's dated January 7 of 2021;  
25 right?

1 A. I do.

2 Q. And under Client/Matter, do you see it  
3 says Voting Machines Analysis?

4 A. I do.

5 Q. And then below Activity, there's a date of  
6 January 7, 2021 for the first entry. Do you see  
7 that?

8 A. I do.

9 Q. And the activity is described as  
10 forensics, colon, forensic expert daily rate;  
11 right?

12 A. That's right.

13 Q. And then for the date of January 7, 2021,  
14 it says:

15 "On-site Coffee County, Georgia.

16 Four people times one day."

17 Right?

18 A. Correct.

19 Q. Who were the four people that came in to  
20 the Coffee County elections office for collection  
21 when you were there that day?

22 MR. DELK: Object to the form.

23 THE WITNESS: Fifth Amendment.

24 BY MR. CROSS:

25 Q. And then there's a second entry that says

1 Forensics Travel. Do you see that?

2 A. I do.

3 Q. Mileage, 394 miles round trip Atlanta,  
4 Georgia to Douglas, Georgia. Do you see that?

5 A. I do.

6 Q. And there's a charge of 220 dollars and 64  
7 cents just for the travel; right?

8 A. I see that.

9 Q. The forensics work, the bill is  
10 26,000 dollars; right?

11 A. Right.

12 Q. And so do you still maintain that you  
13 don't know anything about what happened on January  
14 7th of 2021 even though we've got a bill for over  
15 26,000 dollars for Sullivan Strickler coming in to  
16 do forensics copying of the voting equipment in  
17 Georgia?

18 MR. DELK: Object to the form.

19 THE WITNESS: Fifth Amendment.

20 BY MR. CROSS:

21 Q. The truth is, Mr. Chaney, that the E-mail  
22 that you sent Ms. Herzog in response to the  
23 Washington Post inquiry was a lie, and you knew all  
24 about what happened on January 7th, 2021; right?

25 MR. DELK: Object to the form.

1 THE WITNESS: Fifth Amendment.

2 BY MR. CROSS:

3 Q. You know all about what they did on  
4 January 8th; right?

5 A. Fifth Amendment.

6 Q. You know what they did on January 19;  
7 right?

8 A. Fifth Amendment.

9 Q. How many times did individuals come in to  
10 the Coffee County elections office in 2021 to copy  
11 ballots or copy voting equipment to your knowledge?

12 A. Fifth Amendment.

13 Q. How many times did they do it in 2020?

14 A. Fifth Amendment.

15 Q. Why'd you do it?

16 A. Fifth Amendment.

17 Q. You don't want to explain, you don't want  
18 to defend what you did?

19 A. Fifth Amendment.

20 MR. DELK: Object to the form.

21 BY MR. CROSS:

22 Q. So you're just going to let everyone infer  
23 that you committed a crime?

24 A. Fifth Amendment.

25 Q. Well, you're a true believer in the cause.

1 MR. DELK: Object to the form.

2 Argumentative. That's not even a  
3 question.

4 You don't have to respond.

5 BY MR. CROSS:

6 Q. So you left the board on Friday, and  
7 you're still working at your daddy's car  
8 dealership; right?

9 A. I haven't been in to work today, but I  
10 assume I have a job when I get there.

11 Q. Do you know whether anyone involved with  
12 the events of copying voting equipment in January 7  
13 of 2021, or January 8 or January 19, whether anyone  
14 associated with the County received any payment or  
15 anything of value?

16 MR. DELK: Object to the form.

17 THE WITNESS: Fifth Amendment.

18 MR. DELK: While you're -- I don't  
19 want to interrupt your flow.

20 MR. CROSS: I'm almost done.

21 MR. DELK: If you're getting close to  
22 transitioning, we can --

23 MR. CROSS: Yeah, I'm almost done.

24 MR. DELK: -- push through, but I'm  
25 about at the point I need a break --



1 MR. CROSS: Sure.

2 MR. DELK: -- for a few minutes at  
3 least.

4 MR. CROSS: Sure. Yeah, I think I  
5 can finish up, and then we'll take a  
6 break.

7 MR. DELK: Okay.

8 (Whereupon, Plaintiff's  
9 Exhibit 11 was marked for  
10 identification.)

11 BY MR. CROSS:

12 Q. All right. Let me hand you what's been  
13 marked as Exhibit 11. And just tell me if this is  
14 something you've seen before.

15 (Whereupon, the document was  
16 reviewed by the witness.)

17 THE WITNESS: I don't recall seeing  
18 this.

19 BY MR. CROSS:

20 Q. So Exhibit 11 -- well, let me ask you  
21 this. When you served on the board -- let's make  
22 it even simpler.

23 Are you familiar with a federal agency  
24 called C.I.S.A., C-I-S-A?

25 A. No, sir.

1 Q. Cybersecurity and information -- I forget  
2 the acronym. Cybersecurity and information --  
3 that's embarrassing, because I don't remember. I'm  
4 going to have to look it up. I always just call it  
5 C.I.S.A. Get it right.

6 Okay. Cybersecurity and Infrastructure  
7 Security Agency as part of D.H.S. Are you familiar  
8 with them?

9 A. I'm not.

10 Q. When you served on the board of Coffee  
11 County, what role does the board have with respect  
12 to election security, if any?

13 MR. DELK: Object to the extent any  
14 response he gives is him individually, not  
15 speaking on behalf of the board.

16 If I could just have a standing  
17 objection, I'll try not to interrupt.

18 MR. CROSS: Sure.

19 THE WITNESS: Can you restate that?

20 I'm sorry.

21 BY MR. CROSS:

22 Q. Yeah. Based on your experience as a  
23 member of the Coffee County election board, what's  
24 your understanding of the board's role with respect  
25 to election security?

1           A.     Just to carry out elections in a secure  
2 manner.

3           Q.     How so?

4           A.     The way we store equipment, you know, that  
5 the voting machines are properly stored, locked,  
6 the scanners, the -- all that stuff, all the  
7 equipment is kept locked away.

8           Q.     And do you have an understanding that was  
9 it important to keep the voting equipment, things  
10 like B.M.D.s, poll pads, the E.M.S. server, locked?

11           MR. DELK: Object to the form.

12           THE WITNESS: We have done that.

13           That's how things typically transpire.

14 BY MR. CROSS:

15           Q.     And that was important for election  
16 security?

17           A.     Yes.

18           Q.     Okay. Did you at any point while you were  
19 on the board learn -- well, strike that.

20                   Are you familiar with a -- with an  
21 election security expert named Alex Halderman?

22           A.     No, I'm not.

23           Q.     Did you ever hear at any point while you  
24 were on the board that an election security expert  
25 had been given access by a federal judge to voting

1 equipment from Fulton County, and he had analyzed  
2 that equipment?

3 A. I have not.

4 Q. So you never heard that from the Secretary  
5 of State's office?

6 A. No, sir.

7 Q. Never heard that, in July of last year,  
8 Dr. Halderman prepared a hundred-page report  
9 detailing numerous very serious vulnerabilities  
10 with that equipment?

11 A. I have not.

12 Q. No one ever told --

13 A. And --

14 Q. Oh, go ahead. I'm sorry.

15 A. When you say "equipment," you're saying --

16 Q. The Fulton County Dominion voting  
17 equipment.

18 A. Okay. Specifically for Fulton County  
19 or --

20 Q. Yes.

21 A. Okay. I have not.

22 Q. And specifically a B.M.D. that was  
23 provided, a Dominion B.M.D.

24 A. Yeah, I'm just trying to get a basis on  
25 what you're --

1 Q. Sure.

2 A. -- meaning to say.

3 No, I have not.

4 Q. And so I gather you also were not aware  
5 that the judge allowed Dr. Halderman's report to go  
6 to C.I.S.A. so that C.I.S.A. could do its own  
7 assessment of the reliability of the Dominion  
8 voting equipment?

9 A. No, sir.

10 Q. What you have in front of you as Exhibit  
11 11 is an advisory that C.I.S.A. released in June of  
12 this year after working with Dr. Halderman, his  
13 co-author on the report, Dominion and potentially  
14 others, analyzing the vulnerabilities he had found.  
15 That's what you've got.

16 And you're -- you've never seen this  
17 before?

18 A. I haven't.

19 Q. And this, this wasn't something that the  
20 Secretary's office provided the Coffee County  
21 election board to your knowledge?

22 MR. DELK: Object to the form.

23 THE WITNESS: I'm not sure if they  
24 provided it to other members or possibly  
25 the supervisor, but I haven't personally

1           seen it.

2           BY MR. CROSS:

3           Q.     As a member of the Coffee County election  
4           board, would you expect the Secretary's office to  
5           advise a -- the county election boards that a  
6           federal agency had identified serious  
7           vulnerabilities with the Dominion equipment you  
8           were tasked with using?

9                     MR. DELK: Object to the form.

10          BY MR. CROSS:

11          Q.     You'd expect them to let you know that;  
12          right?

13          A.     I would.

14          Q.     If you look at the heading here, do you  
15          see number one, Summary?

16          A.     I do.

17          Q.     It says:

18                     "This advisory identifies  
19                     vulnerabilities affecting versions of  
20                     the Dominion Voting Systems Democracy  
21                     Suite ImageCast X..."

22                     Do you see that?

23          A.     I do.

24          Q.     And the ImageCast X, that's the B.M.D.;  
25          right? You're aware of that?

1 A. I'm not.

2 Q. Okay. That's -- it goes on:

3 "The ImageCast X can be configured  
4 to allow a voter to produce a paper  
5 record or to record votes  
6 electronically."

7 So we're talking about the B.M.D. here.

8 Are you with me?

9 A. Okay.

10 Q. And then if you come to the end of this  
11 document, turn to the second-to-last page, do you  
12 see there's a heading in bold, number three,  
13 Mitigations at the bottom?

14 A. Yes.

15 Q. And here it reads:

16 "C.I.S.A. recommends election  
17 officials continue to take and further  
18 enhance defensive measures to reduce  
19 the risk of exploitation of these  
20 vulnerabilities."

21 Do you see that?

22 A. I do.

23 Q. "Specifically, for each election,  
24 election officials should."

25 And then you see there's about a dozen

1 bullets that continue on to the top of the next  
2 page?

3 A. I do.

4 Q. Are you aware of any communication by the  
5 Secretary's office to the Coffee County election  
6 board or anyone with responsibility for Coffee  
7 County elections to ensure that any of these  
8 mitigation measures were taken?

9 A. I'm not personally aware.

10 Q. Are you aware of any effort by Coffee  
11 County to implement these mitigation measures?

12 MR. DELK: Object to the form.

13 THE WITNESS: I'm not aware.

14 BY MR. CROSS:

15 Q. And you're not aware that anybody ever  
16 told anyone at Coffee County they needed to  
17 implement these measures; right?

18 A. I'm not personally aware, no, sir.

19 Q. And as a member of the Coffee County  
20 election board, if mitigation measures as serious  
21 as those here were being implemented in the county,  
22 you would expect to have received a report on that  
23 as a member of the board; right?

24 MR. DELK: Object to the form.

25 THE WITNESS: Can you state that



1           again? I'm sorry. I didn't follow you.

2       BY MR. CROSS:

3           Q.     Sure.

4                     One of the things we established earlier  
5       is that the board met at least monthly?

6           A.     Right.

7           Q.     And in those board meetings, things that  
8       were germane to the responsibility of the Coffee  
9       County election board were discussed?

10          A.     Correct.

11          Q.     And so we've got here a federal advisory  
12       that came out in June of this year encouraging  
13       certain mitigation measures to be taken with  
14       respect to the Dominion system used in the state of  
15       Georgia.

16                     Are you with me?

17          A.     I am.

18          Q.     Okay. So if there were efforts made to  
19       implement these mitigation measures in Coffee  
20       County, would you expect that to have been  
21       communicated to you at a board meeting or in some  
22       other fashion as a member of the board?

23                     MR. DELK: Object to the form.

24                     THE WITNESS: Well, it may have been  
25       at some point, but I don't recall.

1 BY MR. CROSS:

2 Q. Okay. Do you know the name Dominic, is it  
3 LaRiccia, L-A-R-I-C-C-I-A?

4 A. I do.

5 Q. Who is that?

6 A. He is I think still our current state  
7 representative in this district. But I know -- I  
8 don't think he's going to be the representative  
9 next term.

10 Q. All right. Are you familiar with an  
11 organization called Cyber Ninjas?

12 A. I'm not.

13 Q. Never heard of them?

14 A. No, sir.

15 Q. Not aware that they're associated with  
16 Doug Logan?

17 A. No, sir.

18 Q. Are you familiar with someone named Shawn  
19 Stills [sic]?

20 A. No, sir.

21 Q. Never heard that name?

22 A. No.

23 MR. CROSS: All right. Let's go off  
24 the record. Give me just one minute. I  
25 think I'm done.

1 MR. DELK: Okay.

2 THE VIDEOGRAPHER: We're going off  
3 the record at 1:26.

4 (Whereupon, a discussion ensued  
5 off the record.)

6 (Whereupon, there was a brief  
7 recess.)

8 THE VIDEOGRAPHER: We're going back  
9 on the record at 1:46.

10 BY MR. CROSS:

11 Q. All right. Mr. Chaney, I'm almost done.  
12 Just a few more questions for you.

13 A. Okay.

14 Q. Will you get Exhibit 10 again real quick?  
15 It was the E-mail thread from Paul Maggio.

16 A. Right.

17 Q. One more question, if you look at the most  
18 recent E-mail, January 28 of 2021, and you come  
19 down to the last E-mail address in the C.C. line,  
20 do you see it says [REDACTED] ?

21 A. I do.

22 Q. Do you recognize that address?

23 A. I do not.

24 Q. Are you aware that that's an E-mail  
25 address for Scott Hall?

1 A. I don't know.

2 Q. You've never communicated with anyone at  
3 that address?

4 A. I have not.

5 Q. Okay. All right. Let me hand you what's  
6 being marked as Exhibit 12.

7 (Whereupon, Plaintiff's  
8 Exhibit 12 was marked for  
9 identification.)

10 BY MR. CROSS:

11 Q. I'll give it to Mr. Delk first.

12 (Whereupon, the document was  
13 reviewed by the witness.)

14 BY MR. CROSS:

15 Q. So this is a LinkedIn profile for Robert  
16 A. Sinners, communications director in the  
17 Secretary of State's office. Have you ever seen  
18 this before?

19 A. Not to my knowledge, no, sir.

20 Q. Okay. So if you look at the first page,  
21 do you see that at the bottom it indicates, Georgia  
22 Republican Party, D.J.T., state director, Election  
23 Day operations, from May of 2020 to February 2021?

24 Do you see that?

25 A. I do.

1 Q. And you understand that D.J.T., that's  
2 Donald Trump?

3 MR. DELK: Object to the form.

4 THE WITNESS: I'm not sure.

5 BY MR. CROSS:

6 Q. Okay. And so we can see here that,  
7 according to Mr. Sinners' LinkedIn page, he worked  
8 with the Georgia Republican Party here from May of  
9 2020 to February 2021.

10 Are you with me?

11 A. Yes, sir.

12 Q. And then we come up towards the top of  
13 that, and it indicates in February of 2021, he  
14 became an employee in the Secretary of State's  
15 office as the director of constituent services.

16 Do you see that?

17 A. Where are we now?

18 Q. Top of the first page.

19 A. I don't --

20 Q. It's up here.

21 A. Okay.

22 Q. Do you see it?

23 A. Yes.

24 Q. Were you aware before today that he was  
25 the director of constituent services in the

1 Secretary's office?

2 A. No.

3 Q. Do you know why it was in February of  
4 2021, just shortly after Scott Hall and others  
5 breached the election equipment in Coffee County,  
6 why it was that Mr. Sinners was then hired in the  
7 Secretary's office?

8 MR. DELK: Object to the form.

9 THE WITNESS: Fifth Amendment.

10 BY MR. CROSS:

11 Q. And you see here he was promoted to  
12 communications director in June of this year?

13 A. I do.

14 Q. And you never had any involvement with  
15 Mr. Sinners as part of your work on the Coffee  
16 County election board?

17 A. Fifth Amendment.

18 Q. Do you sometimes leave bottles of natural  
19 light beer on Ms. Hampton's car, on her windshield?

20 MR. DELK: Object to the form.

21 BY MR. CROSS:

22 Q. From time to time; right?

23 A. Fifth Amendment.

24 Q. Fifth Amendment of whether you left beer  
25 on the car?

1 A. Fifth Amendment.

2 Q. You mentioned before, we talked about this  
3 briefly, I just want to make sure I understood,  
4 that you looked at video evidence from surveillance  
5 cameras in the election county office at Coffee  
6 County before Ms. Hampton and Ms. Riddlehoover were  
7 let go; right?

8 A. That's correct.

9 Q. Tell me everything that you know about the  
10 surveillance system in that office.

11 A. I'm not privy to the surveillance system  
12 in that office. I don't know.

13 Q. Well, you've been in the office many  
14 times?

15 A. I have.

16 Q. Where are the cameras? Where have you  
17 seen cameras?

18 A. I don't know. I never looked for cameras.

19 Q. Well, when you looked at the video, what  
20 was shown? What portion of the office was visible  
21 in the cameras?

22 A. It was just one area that was focused on  
23 that I seen the door, the coming and going of the  
24 door.

25 Q. What area?

1           A.    The front of the -- towards the front  
2 office.

3           Q.    The sort of that open foyer space where  
4 there's a window and Ms. Ridlehoover would sit  
5 behind that window?

6           A.    The door that comes in and out of, not the  
7 lobby door, but the door that goes in and out of  
8 the -- that separates the public from the private  
9 area.

10          Q.    So when you come into the Coffee County  
11 election office, you walk in and there's a room  
12 with a glass window in front of you,  
13 Ms. Ridlehoover would sit behind that window;  
14 right?

15          A.    That's correct.

16          Q.    And then off to the left there's a door,  
17 and that door goes in to where Ms. Ridlehoover and  
18 Ms. Hampton would sit?

19          A.    Misty had a private office. Her office  
20 was through the -- to the left even of that door.

21          Q.    Right. So -- and that's fair.

22                So to be more precise, the door to the  
23 left of that window where Ms. Ridlehoover sat, when  
24 you went through that door, you'd be into a room  
25 where Ms. Ridlehoover's desk was to your right?



1 A. That's right.

2 Q. Is that the door that you saw in the  
3 video?

4 A. Yes.

5 Q. Did the video surveillance capture any  
6 other portion of the office?

7 A. Not that I recall.

8 Q. And Ms. Hampton's office was to the left  
9 when you came inside that door?

10 A. That's correct.

11 Q. And she had a -- she could lock her door?

12 A. Yes.

13 Q. And there were glass windows into her  
14 door?

15 A. That's right.

16 Q. And before you went through the door into  
17 Ms. Ridlehoover's space, to the left of that public  
18 room, there was also a glass window that looked  
19 into the gyms room; right?

20 A. Correct.

21 Q. And that -- that's -- the gyms room is  
22 where the E.M.S. server and I.C.C. were kept?

23 A. Yes. Correct.

24 Q. Including after the switch to the Dominion  
25 system, Dominion and E.M.S. server sat in that same

1 room?

2 A. Correct.

3 Q. So that was visible, that room was visible  
4 to the public as long as the blinds were open?

5 A. That's right.

6 Q. And so the only camera that you're aware  
7 of is the one that caught that door that went from  
8 the public foyer into the space where  
9 Ms. Riddlehoover sat?

10 A. That I recall.

11 Q. Okay. No other cameras you can think of?

12 A. No.

13 Q. Was there any other door that provided  
14 access to Ms. Hampton's office besides that one  
15 door?

16 A. No.

17 Q. So if you wanted to get in to  
18 Ms. Hampton's office, you'd have to come through  
19 the front door of the building and then that door  
20 that sat next to the window where Ms. Riddlehoover  
21 sat?

22 MR. DELK: Object to the form.

23 BY MR. CROSS:

24 Q. That was the only way to get to her  
25 office?

1 A. That I'm aware of.

2 Q. When you come in through the door to the  
3 public space, there's also -- well, strike that.

4 There's a -- there's a room to the right  
5 of that building where the pub -- where the early  
6 voting was done; right?

7 A. That's correct.

8 Q. And that room has its own door into the  
9 parking lot?

10 A. That's right.

11 Q. And that room also has a door that goes  
12 into the space where Ms. Ridlehoover sat; right?

13 A. That's correct.

14 Q. So if you wanted to get into Ms. Hampton's  
15 office, you wouldn't have to go through the door  
16 where the camera is, you could come through the  
17 early voting space; right?

18 A. There again, I'm not sure if you can or  
19 not. I'm not sure if that door that partitions off  
20 those offices are kept locked or not. I'm not sure  
21 of that.

22 Q. Well, before you reached the conclusion  
23 that the video camera captured all the time  
24 Ms. Hampton was in the office, it was important to  
25 figure out with whether there was another access

1 point that was not on camera; right?

2 A. I'm not sure.

3 MR. CROSS: All right. I don't have  
4 any further questions, Mr. Chaney. I  
5 appreciate your time.

6 THE WITNESS: Thank you.

7 MR. CROSS: I think Mr. Brown may  
8 have some questions.

9 THE WITNESS: Sure.

10 MR. CROSS: Bruce, you're up.

11 EXAMINATION

12 BY MR. BROWN:

13 Q. Mr. Chaney, my name is Bruce Brown. I  
14 represent the Coalition plaintiffs in this case. I  
15 just have a couple of questions.

16 MR. BROWN: If you could hand the  
17 witness Exhibit 8.

18 MR. DELK: Do you mind if I close out  
19 this "got it" on the screen so I can see  
20 you?

21 MR. CROSS: Go ahead. Yeah. Go  
22 ahead. Yeah.

23 What's Exhibit 8, Bruce?

24 MR. BROWN: Exhibit 8 is the Jennifer  
25 Herzog exchange.

1 MR. CROSS: He's got it.

2 BY MR. BROWN:

3 Q. Let me refer you to Exhibit 8, and  
4 specifically your E-mail to Jennifer Herzog at the  
5 bottom of the first page of Exhibit 8.

6 Are you with me?

7 A. I am.

8 Q. You'll see that you say I don't know Scott  
9 Hall. Is that still your testimony today?

10 A. Fifth Amendment.

11 Q. And then you say in the next line:

12 [As read] "...nor was I present  
13 at the Coffee County Board of  
14 Elections and registration office when  
15 anyone illegally accessed the server."

16 A. Fifth Amendment.

17 Q. If I change that to say when anyone  
18 accessed the server, would that still be your  
19 position, that you were not there when anyone  
20 accessed the silver -- server, whether it was  
21 illegal or not?

22 MR. DELK: Object to the form.

23 THE WITNESS: Fifth Amendment.

24 BY MR. BROWN:

25 Q. Let me drop down to the bottom sentence in

1 that paragraph. You say:

2 "I have no personal knowledge..."

3 Do you see that?

4 A. Yes.

5 Q. Contrary to the lawyer's statement, do you  
6 have any knowledge that anyone accessed the server  
7 room?

8 A. Fifth Amendment.

9 MR. DELK: Object to the form.

10 BY MR. BROWN:

11 Q. I'm going to direct your attention back to  
12 the lawsuit that was filed by Shawn Still. And I'm  
13 going to see if I can do a screen share.

14 MR. BROWN: Debra, am I authorized to  
15 do the screen share?

16 MR. DELK: What's he talking about  
17 directing back? I don't recall any  
18 lawsuit that he just stated.

19 MR. BROWN: Do you see the --

20 MR. DELK: I want to make sure we're  
21 on the same page.

22 MR. BROWN: I don't know if I'm  
23 sharing the screen or not. Am I?

24 MR. DELK: No.

25 THE WITNESS: It doesn't appear so.

1 (Whereupon, a technical discussion  
2 ensued off the record.)

3 MR. BROWN: Let me -- I'm going to  
4 mark this as the next exhibit number,  
5 which would be what?

6 MR. DELK: 13.

7 MR. CROSS: 13, yeah.

8 (Whereupon, Plaintiff's  
9 Exhibit 13 was marked for  
10 identification.)

11 BY MR. BROWN:

12 Q. Exhibit 13 is a copy of the lawsuit filed  
13 by Shawn Still against you and other members of the  
14 board and Brad Raffensperger.

15 Are you still not familiar with that  
16 lawsuit?

17 A. Sorry. It doesn't ring a bell.

18 Q. Did you have any communications with Shawn  
19 Still before he filed this lawsuit that you recall?

20 A. I don't even know who Shawn Still is.

21 Q. Shawn Still is affiliated with Mr. Sinners  
22 and Ms. Latham, and they're all so-called  
23 alternative electors.

24 Does that refresh your recollection?

25 A. Fifth Amendment.

1 Q. Do you know if the facts relating to a  
2 lawsuit that was to be filed against Coffee County  
3 were shared with anybody relating to Coffee County  
4 before they were -- before the lawsuit was filed?

5 A. Fifth Amendment.

6 MR. DELK: Object to the form.

7 BY MR. BROWN:

8 Q. Do you know anything about a friendly  
9 lawsuit that was filed by Shawn Still against  
10 Coffee County for the purpose of getting access to  
11 Coffee County's election equipment in discovery?

12 MR. DELK: Object to the form.

13 THE WITNESS: Fifth Amendment.

14 BY MR. BROWN:

15 Q. Do you recall any friendly lawsuit being  
16 filed against Coffee County so that, as was the  
17 case in Nevada, election equipment could be  
18 obtained in discovery?

19 A. Fifth Amendment.

20 Q. Do you know why this lawsuit was dropped  
21 the same day, January 7, that Brad [sic] Hall and  
22 others made copies of the Coffee County election  
23 equipment, making the lawsuit unnecessary?

24 MR. DELK: Object to the form.

25 THE WITNESS: Fifth Amendment.



1 BY MR. BROWN:

2 Q. Did you speak with Tony Rowell about this  
3 lawsuit either before or after it was filed?

4 MR. DELK: Object to the form.

5 That's attorney-client privileged.

6 BY MR. BROWN:

7 Q. To your recollection, did you speak to  
8 anybody about a lawsuit in December and January  
9 that was filed against you and the other members of  
10 the board and Brad Raffensperger?

11 MR. DELK: Object to the form. Vague  
12 to the extent any such communications are  
13 privileged.

14 THE WITNESS: Fifth Amendment.

15 BY MR. BROWN:

16 Q. Do you know how Mr. Still got access to  
17 the information that he put in the complaint if it  
18 was not through some sort of back-door  
19 communications with people at Coffee County?

20 MR. DELK: Object to the form.

21 THE WITNESS: Fifth Amendment.

22 BY MR. BROWN:

23 Q. Did you talk with Cathy Latham about the  
24 Shawn Still lawsuit?

25 A. Fifth Amendment.

1 Q. Do you know who John Eastman is?

2 A. I do not.

3 Q. Did you talk to him about the copying of  
4 the election equipment in Coffee County?

5 A. Fifth Amendment.

6 MR. BROWN: I don't have any further  
7 questions.

8 (Whereupon, a technical discussion  
9 ensued off the record.)

10 EXAMINATION

11 BY MR. PICO-PRATS:

12 Q. Mr. Chaney, I just have a few more  
13 questions, and then we'll be done for the day.

14 A. Okay.

15 Q. Do you know who the plaintiffs are in this  
16 lawsuit that you're being deposed for?

17 A. I do not. Are you asking about know them  
18 personally or --

19 Q. If you just know them --

20 A. I do not.

21 Q. Okay. Do you know who Donna Curling is?

22 A. I've seen the name, but I don't know who  
23 she is.

24 Q. Do you know Donna Price?

25 A. I don't.

1 Q. Do you know Jeffrey Stromberg?

2 A. I do not.

3 Q. Do you know the Coalition for Greater  
4 Governance?

5 A. I've seen that name.

6 Q. What do you know about the Coalition?

7 A. I think Marilyn Marks heads that up, if  
8 I'm not mistaken. And she is -- she did reach out  
9 to me sometime way back, but I don't specifically  
10 remember our dialogue.

11 Q. When was the first time that Marilyn Marks  
12 reached out to you?

13 A. I think it was sometime in 2020.

14 Q. Was it the front half of 2020?

15 A. The -- probably around or before the  
16 election in 2020.

17 Q. The November --

18 A. Yes.

19 Q. -- election?

20 Do you know generally what Marilyn Marks  
21 was reaching out about?

22 A. To be honest with you, I didn't appreciate  
23 her -- she was annoying, and she wouldn't -- she'd  
24 just call, call, call, call, E-mail, E-mail,  
25 E-mail. I didn't want to have any dialogue with

1 her.

2 Q. What was she calling about?

3 A. I'm not exactly sure.

4 Q. Did you ever actually speak with her or  
5 was it only phone calls that were left unanswered?

6 A. I think I did speak to her on the phone,  
7 you know, answer a call that I wasn't sure who it  
8 was. And after speaking to her briefly and -- I  
9 just didn't return calls or didn't reply to her  
10 E-mails.

11 Q. When was the last time that she reached  
12 out to you?

13 A. I'm not exactly sure.

14 Q. Was it in this year?

15 A. I'm not sure.

16 Q. Did you ever speak to her about the  
17 Dominion voting equipment?

18 A. Not that I recall.

19 Q. Did you ever speak to her about the  
20 forensic examination?

21 A. Not that I recall.

22 MR. PICO-PRATS: That's all the  
23 questions I have for you.

24 THE WITNESS: Thank you.

25 (Whereupon, a discussion ensued

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off the record.)

THE VIDEOGRAPHER: So we are going  
off the record at 2:05 p.m.

(Whereupon, a discussion ensued  
off the record.)

(Whereupon, the reading and  
signing of the deposition by the  
witness was reserved.)

- - -

(Witness excused.)

- - -

(Whereupon, the deposition  
concluded at 2:10 p.m.)

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Veritext represents that the foregoing transcript as produced by our Production Coordinators, Georgia Certified Notaries, is a true, correct and complete transcript of the colloquies, questions and answers as submitted by the certified court reporter in this case.

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1 R E P O R T E R C E R T I F I C A T E  
2 STATE OF GEORGIA )  
3 COBB COUNTY )

4 I, Debra M. Druzisky, a Certified Court  
5 Reporter in and for the State of Georgia, do hereby  
6 certify:

7 That prior to being examined, the witness  
8 named in the foregoing deposition was by me duly  
9 sworn to testify to the truth, the whole truth, and  
10 nothing but the truth;

11 That said deposition was taken before me  
12 at the time and place set forth and was taken down  
13 by me in shorthand and thereafter reduced to  
14 computerized transcription under my direction and  
15 supervision. And I hereby certify the foregoing  
16 deposition is a full, true and correct transcript  
17 of my shorthand notes so taken.

18 Review of the transcript was requested.  
19 If requested, any changes made by the deponent and  
20 provided to the reporter during the period allowed  
21 are appended hereto.

22 I further certify that I am not of kin or  
23 counsel to the parties in the case, and I am not in  
24 the regular employ of counsel for any of the said  
25 parties, nor am I in any way financially interested  
in the result of said case.

IN WITNESS WHEREOF, I have hereunto  
subscribed my name this 18th day of August, 2022.

-----  
Debra M. Druzisky  
Georgia CCR-B-1848

1 To: Mr. Delk

2 Re: ERIC B. CHANEY

3 Date Errata due back at our offices: \_\_\_\_\_

4  
5 Greetings:

6  
7 This deposition has been requested for read and  
8 sign by the deponent. It is the deponent's  
9 responsibility to review the transcript, noting any  
10 changes or corrections on the attached PDF Errata.  
11 The deponent may fill out the Errata electronically  
12 or print and fill out manually.

13  
14 Once the Errata is signed by the deponent and  
15 notarized, please mail it to the offices of  
16 Veritext (below).

17  
18 When the Errata is returned to us, we will seal  
19 and forward to the taking attorney to file with the  
20 original transcript. We will also send copies of  
21 the Errata to all ordering parties.

22  
23 If the signed Errata is not returned by the  
24 above date, the original transcript may be filed  
25 with the court without the signature of the  
deponent.

Please send completed Errata to:

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1 ERRATA FOR ASSIGNMENT # 5317960

2 I, the undersigned, do hereby certify that I  
3 have read the transcript of my testimony, and that

4 \_\_\_\_\_ there are no changes noted; or

5 \_\_\_\_\_ the following changes are noted:

6  
7 Pursuant to Rule 30(7)(e) of the Federal Rules  
8 of Civil Procedure and/or OCGA 9-11-30(e), any  
9 changes in form or substance which you desire to  
10 make to your testimony shall be entered upon the  
11 deposition with a statement of the reasons given  
12 for making them.

13 To assist you in making any such corrections,  
14 please use the form below. If additional pages are  
15 necessary, please furnish same and attach hereto.

16 Page\_\_\_\_\_Line\_\_\_\_\_Change:\_\_\_\_\_

17 Reason for change:\_\_\_\_\_

18 Page\_\_\_\_\_Line\_\_\_\_\_Change:\_\_\_\_\_

19 Reason for change:\_\_\_\_\_

20 Page\_\_\_\_\_Line\_\_\_\_\_Change:\_\_\_\_\_

21 Reason for change:\_\_\_\_\_

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DEPONENT'S SIGNATURE

20

21 Sworn to and subscribed before me this \_\_\_\_\_ day of

22 \_\_\_\_\_, 2022.

23 \_\_\_\_\_

NOTARY PUBLIC

24 My Commission Expires: \_\_\_\_\_.

25 \_\_\_\_\_ Notary Public

1           R E P O R T E R   D I S C L O S U R E  
2   DISTRICT COURT   )   DEPOSITION OF  
3   NORTHERN DISTRICT)   ERIC B. CHANEY  
4   ATLANTA DIVISION )

5           Pursuant to Article 10.B of the Rules and  
6   Regulations of the Board of Court Reporting of the  
7   Judicial Council of Georgia, I make the following  
8   disclosure:

9           I am a Georgia Certified Court Reporter.  
10   I am here as a representative of Veritext Legal  
11   Solutions.

12           Veritext Legal Solutions was contacted by  
13   the offices of Morrison & Foerster to provide court  
14   reporting services for this deposition. Veritext  
15   Legal Solutions will not be taking this deposition  
16   under any contract that is prohibited by O.C.G.A.  
17   9-11-28 (c).

18           Veritext Legal Solutions has no contract  
19   or agreement to provide court reporting services  
20   with any party to the case, or any reporter or  
21   reporting agency from whom a referral might have  
22   been made to cover the deposition.

23           Veritext Legal Solutions will charge its  
24   usual and customary rates to all parties in the  
25   case, and a financial discount will not be given to  
any party in this litigation.

                          Debra M. Druzisky  
                          Georgia CCR-B-1848

Georgia Code

Title 9, Chapter 11

Article 5, Section 9-11-30

(e) Review by witness; changes; signing.

If requested by the deponent or a party before completion of the deposition, the deponent shall have 30 days after being notified by the officer that the transcript or recording is available in which to review the transcript or recording and, if there are changes in form or substance, to sign a statement reciting such changes and the reasons given by the deponent for making them. The officer shall indicate in the certificate prescribed by paragraph (1) of subsection (f) of this Code section whether any review was requested and, if so, shall append any changes made by the deponent during the period allowed. If the deposition is not reviewed and signed by the witness within 30 days of its submission to him or her, the officer shall sign it and state on the record that the deposition was not reviewed and signed by the deponent within 30 days. The deposition may then be used as fully as though signed unless, on a motion to suppress under paragraph (4) of subsection (d) of Code

Section 9-11-32, the court holds that the reasons given for the refusal to sign require rejection of the deposition in whole or in part.

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VERITEXT LEGAL SOLUTIONS  
COMPANY CERTIFICATE AND DISCLOSURE STATEMENT

Veritext Legal Solutions represents that the foregoing transcript is a true, correct and complete transcript of the colloquies, questions and answers as submitted by the court reporter. Veritext Legal Solutions further represents that the attached exhibits, if any, are true, correct and complete documents as submitted by the court reporter and/or attorneys in relation to this deposition and that the documents were processed in accordance with our litigation support and production standards.

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