

UNITED STATES DISTRICT COURT  
FOR THE NORTHERN DISTRICT OF GEORGIA  
ATLANTA DIVISION

Civil Action No. 1:17-cv-02989-AT

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DONNA CURLING, et al.,

Plaintiffs,

vs.

BRAD RAFFENSPERGER, et al.,

Defendants.

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VIDEOTAPED DEPOSITION OF EMILY MISTY HAMPTON

DATE: November 11, 2022

TIME: 10:49 a.m. to 6:07 p.m.

LOCATION: Courtyard by Marriott Warner Robins  
589 Carl Vinson Parkway  
Warner Robins, Georgia 31088

REPORTED BY: Felicia A. Newland, CSR

Veritext Legal Solutions  
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22

1                                   A P P E A R A N C E S

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10           Ernestine Thomas-Clark

11           Kevin Skoglund

12           Oluwasegun Joseph

13           Susan Greenhalgh

14           Duncan Buell

15           Adam Sparks

16           Alexander Denton

17           Caroline Middleton

18           Veronica Ascarrunz

19           Philip Stark

20           Duncan Bell

21           Sonja Swanbeck

22    Videographer:   Scott Bridwell

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

2 \* \* \* \* \*

3 VIDEOGRAPHER: Good morning. We are  
4 going on the record at 10:49 a.m., 11/11/2022.  
5 Please note the microphones are sensitive and may  
6 pick up any whispering or private conversations.  
7 Please mute your phones at this time.

8 Audio and video recording will  
9 continue to take place unless all parties agree  
10 to go off the record.

11 This is Media Unit 1 of the  
12 video-recorded deposition of Emily M. Hampton,  
13 taken by counsel for the plaintiff in the matter  
14 of Donna Curling versus Brad Raffensperger, filed  
15 in the United States District Court for the  
16 Northern District, Case Number 1:17-cv-02989-AT.  
17 The location of the deposition is being at the  
18 Courtyard by Marriott, Warner Robins, Georgia.

19 My name is Scott Bridwell,  
20 representing Veritext Legal Solutions. I am the  
21 videographer. The court reporter is Felicia  
22 Newland, from the firm Veritext Legal Solutions.



1 I'm not authorized to administer an  
2 oath, I'm not related to any party in this  
3 action, nor am I financially interested in the  
4 outcome.

5 If there are any objections to  
6 proceeding, please state them at the time of your  
7 appearance. Counsel and all present, including  
8 remotely, will now state their appearance and  
9 affiliations for the record, beginning with the  
10 noticing attorney.

11 MR. BROWN: This is Bruce Brown. I'm  
12 counsel for Coalition Plaintiffs.

13 MS. ELSON: This is Hannah Elson,  
14 Morrison & Foerster, here on behalf of Curling  
15 Plaintiffs.

16 MS. LAROSS: This is Diane LaRoss.  
17 And I'm here on behalf of the State Defendants.

18 MR. LOWMAN: This is David Lowman.  
19 And I am here on behalf of the Fulton County  
20 Defendant.

21 MR. MILLER: I'm sorry, who is this  
22 last person?

1 MR. LOWMAN: David Lowman.

2 MR. MILLER: And who are you with,  
3 Mr. Lowman?

4 MR. LOWMAN: Office of the Fulton  
5 County Attorney.

6 MR. MILLER: Okay. We're -- this --  
7 this is a deposition on the Curling case, this is  
8 not a deposition for the Fulton County, and I --  
9 we're not going to participate if Fulton County is  
10 here.

11 MR. LOWMAN: Fulton County is a party  
12 to this case, sir.

13 MR. MILLER: What branch of Fulton  
14 County are you working for?

15 MR. LOWMAN: The Office of the Fulton  
16 County Attorney.

17 MR. MILLER: Okay. Not the district  
18 attorney, the attorney?

19 MR. LOWMAN: Correct.

20 MR. MILLER: I apologize for not  
21 understanding.

22 MR. LOWMAN: No problem.

1 MR. MILLER: And do I need to make my  
2 announcement?

3 This is Attorney Jonathan Miller,  
4 here on behalf of Ms. Hampton.

5 VIDEOGRAPHER: I'm assuming that the  
6 rest of you attorneys are not going to go on the  
7 record today?

8 Madam Court Reporter, if you would,  
9 please in the witness.

10 \* \* \* \* \*

11 Whereupon,

12 EMILY MISTY HAMPTON  
13 was called as a witness and, having been first duly  
14 sworn, was examined and testified as follows:

15 EXAMINATION BY COUNSEL FOR COALITION PLAINTIFFS  
16 BY MR. BROWN:

17 Q Please state your name for the  
18 record.

19 A Emily Misty Hampton.

20 Q Ms. Hampton, my name is Bruce Brown.  
21 And I represent the Coalition Plaintiffs. I'm  
22 going to be asking you some questions today. One

1 thing, particularly since we're on Zoom, it's very  
2 important that I let you finish your answer before  
3 I ask the next question, and that you do the same  
4 with respect to my questions.

5 If you don't understand a question,  
6 let me know. If you ever need a break, feel free  
7 to take a break.

8 MR. BROWN: Or, Jonathan, if you need  
9 a break, let us know.

10 BY MR. BROWN:

11 Q Ms. Hampton, by whom are you  
12 currently employed?

13 MR. MILLER: She's waiting on the  
14 videographer to fix something.

15 VIDEOGRAPHER: I'm staying out of the  
16 way. You all could have went ahead. You can see  
17 everybody.

18 THE WITNESS: I am employed by  
19 Specialized Structures.

20 BY MR. BROWN:

21 Q And what do you do for Specialized  
22 Structures?

1 A A little bit of everything.

2 Q And are you represented today by  
3 counsel?

4 A I am.

5 Q And who are you represented by?

6 A Mr. Jonathan Miller.

7 Q Who are your other lawyers with  
8 respect to this matter?

9 MR. MILLER: You have one.

10 THE WITNESS: I have one.

11 BY MR. BROWN:

12 Q Just Jonathan?

13 A (Moving head up and down.)

14 Q Okay. Have you been represented by  
15 Ms. Stephanie Lambert in the past?

16 MR. MILLER: You can answer that.

17 THE WITNESS: Yes, I have.

18 BY MR. BROWN:

19 Q And does she represent you now?

20 A She does.

21 Q Do any other lawyers represent you  
22 now?

1 MR. MILLER: Why don't you rephrase  
2 that question?

3 VIDEOGRAPHER: Are you objecting to  
4 the form of the question, sir?

5 MR. MILLER: No, no, I'm not  
6 objecting, I'm just asking her to reform it so that  
7 she might understand it better.

8 BY MR. BROWN:

9 Q Okay. Do any other lawyers represent  
10 you now?

11 A I don't know how to answer that  
12 because I speak with Jonathan. I speak with  
13 Mr. Miller.

14 Q Are you involved in another  
15 litigation right now?

16 A Not right now.

17 Q In the past year have you been  
18 represented by other lawyers other than Ms. Lambert  
19 and Mr. Miller?

20 A No, sir.

21 Q Okay. How about in 2021?

22 A As a personal matter, no, sir.

1 Q And are you distinguishing, what, by  
2 saying "as a personal matter"?

3 A When I was employed with the Coffee  
4 County Board of Elections, I was.

5 Q And who -- who were your lawyers when  
6 you there -- when you were there?

7 A The County Attorney.

8 Q Tony Rowell?

9 A Yes.

10 Q Have you ever been represented by  
11 Charles Bundren?

12 A Not that I'm aware of.

13 Q Oh, just for the record, your last  
14 name now is Hampton, right?

15 A Correct.

16 Q And have you had other last names in  
17 the past couple of years?

18 A I have.

19 Q And what -- what are those?

20 A Hayes or Martin.

21 Q And when did you -- did you become  
22 Hampton?

1 A That's my maiden name.

2 Q Okay. Thank you.

3 And when did you return to your  
4 maiden name?

5 A I think it was February of '21.

6 Q And were you Martin before that?

7 A Correct.

8 Q Okay. Ms. Hampton, you were the  
9 Coffee County Election supervisor. Is that right?

10 A Correct.

11 Q And what was -- when did you start  
12 with Coffee County Election Office, the office  
13 itself?

14 A 2012, I think.

15 Q And what was your position when you  
16 started?

17 A Clerk.

18 Q And when did you become the election  
19 supervisor, roughly?

20 A I think somewhere around '15.

21 Q And running forward to, let's say,  
22 the 2019 period onward, who reported to you in the



1 Coffee County Election Office?

2 A I had one full-time employee, and  
3 that was Jil Ridlehoover.

4 Q Did you have any part-time employees?

5 A Yes, sir.

6 Q And who were they?

7 Some of -- just working on separate  
8 elections --

9 A Yes, sir.

10 Q -- contractors?

11 Did you have any part-time employees  
12 that worked like, let's say, more than ten hours a  
13 week other than Jil?

14 A No, sir, not unless it was election  
15 season.

16 Q And to whom did you report?

17 A I reported to the Coffee County Board  
18 of Elections.

19 Q Was there a particular member on the  
20 board that you reported to or was it the board as a  
21 whole?

22 A The board as a whole.

1 Q How often did you meet with the Board  
2 of Elections?

3 A Once a month.

4 Q And those were the regularly  
5 scheduled board meetings?

6 A Correct.

7 Q Ms. Hampton, I'm going to skip around  
8 a little bit, so just bear with me, and make sure  
9 that you understand my question. But I want to  
10 turn now to the video that you made showing the  
11 issue with electronic adjudication.

12 Do you remember that?

13 A Yes, sir.

14 Q And when -- about when did you make  
15 that?

16 A I think it was in December of '20.

17 Q That would have been several weeks  
18 after the general election?

19 A Correct.

20 Q And what prompted you to make the  
21 video?

22 A I discovered how an election

1 supervisor could change a vote during adjudication  
2 by accident, and I showed a board member and he  
3 wanted to bring it before the Board so that the  
4 Board could see everything.

5 Q And which board member did you bring  
6 it to?

7 A Eric Chaney.

8 Q And who actually made the video? Or  
9 who made it with you, I should say?

10 A The Board.

11 Q The entire Board?

12 A Correct.

13 Q And how did -- did you make the video  
14 public?

15 A I did not make the video public.

16 Q Was it made public to your knowledge?

17 A Yes.

18 Q What was it on? Twitter?

19 A I do not know.

20 Q And what sort of reaction did you get  
21 from people to the posting of your video?

22 MR. MILLER: Object to form.

1 BY MR. BROWN:

2 Q I mean, did you get questions?  
3 Support? Criticism? What sort of reaction did you  
4 get, if any?

5 MR. MILLER: Same.

6 THE WITNESS: All kinds of reactions  
7 from across the board.

8 BY MR. BROWN:

9 Q Such as?

10 A Some were praising, some were  
11 objecting to it, some were in shock that someone  
12 could do that.

13 Q Did the Secretary of State ever make  
14 any inquiry into your findings relating to the  
15 problem with the adjudication?

16 MS. LAROSS: Objection as to form.

17 MR. MILLER: Bruce, can -- let's stop  
18 for just a second. I apologize. I'm sitting here  
19 looking at -- 6, 9, 12, 15 -- 19 people's names  
20 that are apparently listening in on this. Is it  
21 possible that we could have their names put on the  
22 record and what their relationship to this case is?

1 MR. BROWN: I mean, it's -- we  
2 typically don't do that. I don't have any strong  
3 objection to doing that.

4 MR. MILLER: Well, I just think my  
5 client would like to know who she's talking at.

6 MR. BROWN: Well, she's under oath.  
7 I mean, this is a public proceeding.

8 BY MR. BROWN:

9 Q You understand that, don't you,  
10 Ms. Hampton?

11 A I do.

12 Q Okay. And you don't have a problem  
13 testifying under oath, do you?

14 A No, sir.

15 Q Okay. Well, then let's continue.

16 MR. MILLER: Let me ask one other  
17 question on that. Is there any person on this list  
18 of 20 names with law enforcement?

19 MS. ELSON: Yes.

20 MR. BROWN: You mean --

21 MR. MILLER: Yes?

22 MS. ELSON: My name is Hannah Elson.

1 I'm an attorney for the Curling Plaintiffs. I work  
2 at Morrison & Foerster.

3 MR. MILLER: I do not -- you don't  
4 work with the State?

5 MS. ELSON: Correct.

6 MR. MILLER: Okay. So you -- so you  
7 are not with law enforcement.

8 MS. ELSON: Oh, you said "law  
9 enforcement." I apologize. I heard Morrison &  
10 Foerster.

11 MR. MILLER: Okay. You know, as long  
12 as there's no one with law enforcement on this, I  
13 understand that it's a public deposition, but there  
14 are considerations there. Bruce, I apologize for  
15 jumping in in the middle of that. Please continue.

16 BY MR. BROWN:

17 Q I think my question was whether you  
18 received any inquiry from the Secretary of State  
19 with respect to your video showing the issue with  
20 electronic adjudication.

21 MS. LAROSS: And I believe I lodged  
22 an objection as to form.

1 THE WITNESS: So can I answer?

2 MR. MILLER: Yes, you may answer.

3 THE WITNESS: I did.

4 BY MR. BROWN:

5 Q And who contacted you?

6 A The investigator. I can't remember  
7 his name off the top of my head.

8 Q The investigator from -- from the  
9 State?

10 A Correct.

11 Q And what did he ask you or what did  
12 you tell him?

13 A He and two other investigators came  
14 to the office.

15 Q About when did they come to the  
16 office?

17 A I remember it was on a Friday, I  
18 don't remember the date.

19 Q Was it before Christmas or after  
20 Christmas?

21 A I don't remember the date.

22 Q Was it before you finished the

1 recount?

2 A At this time I -- I can't remember if  
3 it was or was not.

4 Q What was the substance of the meeting  
5 you had with the investigators?

6 A It was during the recount, or I think  
7 it was after certification of the recount because  
8 they came to investigate the recount as well.

9 Q And what -- what was it about the  
10 recount that they were investigating?

11 A There was a 50-ballot difference.

12 Q And did you and the investigators  
13 resolve the 50-ballot difference?

14 A We did.

15 Q And how did you resolve it?

16 A Counted the ballots by hand, put them  
17 in stacks of a hundred.

18 Q And after you did that, did you  
19 reconcile the -- the totals?

20 A To the penny.

21 Q Getting -- getting back to your --  
22 your video, are you aware of any instance in which



1 ballots in the state of Georgia were changed  
2 incorrectly because of the adjudication function?

3 MR. MILLER: Object to form.

4 MS. LAROSS: I also object as to  
5 form.

6 THE WITNESS: I don't know of any.

7 BY MR. BROWN:

8 Q We're going to try to do the Exhibit  
9 Share. And I would like to pull up Tab 5 and mark  
10 it as Exhibit 1.

11 (Hampton Deposition Exhibit Number 1  
12 marked for identification.)

13 MR. BROWN: And I can't do that.

14 MS. CONWAY: This is Jenna Conway.  
15 I'm doing it right now.

16 MR. BROWN: Great. Thank you, Jenna.

17 MR. MILLER: Bruce, do you all have a  
18 hard copy of that for us here today?

19 MR. BROWN: We do not.

20 MS. MARKS: It's on -- let me adjust  
21 the screen. It's just showing --

22 VIDEOGRAPHER: It shows on her?

1 MS. MARKS: I'm talking about Misty's  
2 screen. She may need -- we may need help. I  
3 thought it was only her picture would show. I was  
4 just going to make sure she was -- she's going to  
5 be able to see it in Exhibit Share.

6 VIDEOGRAPHER: I think when we do  
7 Exhibit Share, it takes over. Right now she's  
8 under -- and I'm not a professional on this, I'm  
9 not an IT person. My wife is, she tells me what to  
10 do. When he does Exhibit Share, it will take over  
11 pretty much the whole screen, but I have to have  
12 her on the spotlight so that everybody can see her.

13 And, ma'am, if that does come up  
14 and you can't see it good enough, I will try and  
15 do my best. I'll come over and assist any way  
16 possible.

17 THE WITNESS: Okay. May I have  
18 another one of those napkins, please?

19 MS. CONWAY: Hey, Scott, this is  
20 Jenna Conway. My experience with Exhibit Share is  
21 that it's a completely separate program. It's not  
22 at all a part of the Zoom, and so it won't take --

1 it won't go screen share, it won't take over.

2 It's -- I think the witness typically looks at it  
3 on a separate laptop that's logged into Exhibit  
4 Share. If that's not set up, we might have to do a  
5 screen share, which, I guess, means I would have to  
6 be made a co-host in order to do that.

7 VIDEOGRAPHER: Okay. That is -- that  
8 is not set up at this moment.

9 MS. CONWAY: Yeah.

10 VIDEOGRAPHER: I have -- that's  
11 why --

12 MS. CONWAY: Marilyn, are you able to  
13 pull up on Exhibit Share on a laptop and give it to  
14 Misty?

15 MS. MARKS: Yeah, I --

16 MR. CROSS: Are we still on the  
17 record?

18 VIDEOGRAPHER: Yes, we are on the  
19 record.

20 MR. CROSS: We need to go off the  
21 record, guys.

22 MR. BROWN: Yeah. Thank you, David.

1 MR. MILLER: Just help us out, she  
2 needs to be able to see it.

3 VIDEOGRAPHER: We are going off the  
4 record at 11:10 a.m.

5 (Recess from 11:10 a.m. to 11:20 a.m.)

6 VIDEOGRAPHER: We are on the record  
7 at 11:20.

8 BY MR. BROWN:

9 Q Okay. Back on the record.

10 Ms. Hampton, you should have in front  
11 of you Exhibit 1, which is a press release from the  
12 Secretary of State's Office. Do you see that?

13 A I do.

14 Q And do you recall, in general, the  
15 issue of -- of the delays, if there were delays, in  
16 the recount for Coffee County for the general  
17 election of 2020?

18 A I do.

19 Q And Coffee County was the last county  
20 to certify its results in the 2020 election. Is  
21 that right?

22 MR. MILLER: Object to form.

1                   You may answer.

2                   THE WITNESS: Coffee County was the  
3 last county.

4 BY MR. BROWN:

5                   Q       You mentioned before that there was a  
6 50 -- you were resolving a 50-ballot discrepancy.  
7 Do you recall that?

8                   A       I do.

9                   Q       And what was -- and it was a  
10 discrepancy between what and what?

11                  A       There were 50 more ballots than there  
12 were turned in.

13                  Q       And that was in the recount?

14                  A       The electronic recount when the  
15 printout from Dominion showed 50 more ballots.

16                  Q       And then did you recount them by hand  
17 and it was resolved?

18                  A       Correct.

19                  Q       And you got some criticism for taking  
20 as long as you did, correct?

21                         MS. LAROSS: Objection as to form.

22                         MR. MILLER: Thank you.

1 THE WITNESS: I did.

2 BY MR. BROWN:

3 Q And did -- I mean, did anybody tell  
4 you to slow down the process or delay or anything  
5 like that?

6 A No, sir.

7 Q And was your office working as fast  
8 as you could?

9 A Yes, sir.

10 Q Let me mark as Exhibit 2 Tab 24.  
11 (Hampton Deposition Exhibit Number 2  
12 marked for identification.)

13 BY MR. BROWN:

14 Q And if you could tell me when that  
15 appears.

16 MS. MARKS: She doesn't have it yet.  
17 Just a second, Bruce.

18 Can you see it now, Misty?

19 THE WITNESS: I do.

20 BY MR. BROWN:

21 Q Okay. Can you see Exhibit 2?

22 A I do.

1 Q And are these your text messages with  
2 a Gary W?

3 A It's Gary with Dominion, yes, sir.

4 Q Okay. And was he assigned to Coffee  
5 County?

6 A He was the regional tech.

7 Q And he helped you out with issues as  
8 they arose?

9 A Yes, sir.

10 Q Let me have you turn to page 7 of  
11 Exhibit 2. Do you see that?

12 A I do.

13 Q And let me -- drop down a little bit  
14 down the page to the December 3rd, 2020 entry. You  
15 say there you're waiting on the Board to make a  
16 decision. Do you -- and then you say, "Could I do  
17 a different database and run the ballots again?"  
18 Could you describe what was going on then?

19 A I don't remember.

20 Q Let me -- if you would just turn the  
21 page to page 7.

22 MS. MARKS: It looks like page 7 --

1       which one --

2                       MR. MILLER:  Bruce, we're looking at  
3       the bottom of page 7 right now.

4                       MR. BROWN:  I'm sorry, page 8.  My  
5       bad.

6       BY MR. BROWN:

7               Q       Do you see that?  Are you with me,  
8       page 8?

9               A       Yes.  I think that's page 8.  Yes,  
10       that's page 8.

11              Q       This is -- and you see the text dated  
12       December 4th.  Do you see those?

13              A       I do.

14              Q       And this is right around the time  
15       that you were getting a lot of pressure to get the  
16       recount done, right?

17              A       I don't remember the date of the  
18       recount.

19              Q       And do you recall the press release  
20       where the Secretary of State was trying to get in  
21       touch with you?

22                      MS. LAROSS:  Objection as to form.



1 THE WITNESS: No, sir, I don't recall  
2 a press release.

3 BY MR. BROWN:

4 Q Do you -- well, that was Exhibit 1,  
5 but let's just keep moving.

6 In this text you say -- right in the  
7 dead center of the page, you say, "Oh, well, we'll  
8 see Monday. Laugh out loud. I'm not worrying  
9 about it all weekend." Do you see that?

10 A Correct.

11 Q So you all didn't work over the  
12 weekend to get the recount done, right?

13 I'm not suggesting that you should  
14 have, I'm just asking if you did.

15 A I did not.

16 Q If you turn the page to page 9 of  
17 Exhibit 2, you'll see a text to Gary with Dominion.  
18 You say, "Hey, is there any way that you could get  
19 me a statement to cover me to the Board that you  
20 don't understand why the ICC is not scanning  
21 correctly."

22 Do you see that?

1 A I do.

2 Q What was that about?

3 A The ICC not scanning correctly.

4 Q Like it says. What was it doing?

5 A Not scanning correctly.

6 Q How did it -- how did the errors  
7 manifest themselves?

8 A I don't know.

9 Q How did you know it wasn't scanning  
10 correctly?

11 A It was kicking ballots back.

12 Q Did you fix it? Was it fixed?

13 A Partially.

14 Q You mention a report. Did you get  
15 some sort of report from Gary W on that?

16 A No, sir.

17 MR. BROWN: I'm going to mark as  
18 Exhibit 3 Tab 2.

19 (Hampton Deposition Exhibit Number 3  
20 marked for identification.)

21 BY MR. BROWN:

22 Q And just let me know when that's in

1 front of you.

2 Do you see it? Do you have it?

3 A No, sir.

4 MS. MARKS: It's not up yet. Bruce,  
5 it's not loaded into Exhibit Share yet.

6 MR. BROWN: Okay.

7 THE WITNESS: It's there.

8 BY MR. BROWN:

9 Q And is Tab 2 your text messages with  
10 Eric Chaney?

11 A Yes, it is.

12 Q And if you could go to page 10 of  
13 Exhibit 2 -- of Exhibit 3.

14 A Okay.

15 Q In the middle on November 9,  
16 Mr. Chaney texted to you, he says, "We are going to  
17 have a guest tomorrow at the board meeting. Make  
18 sure we have an audience participation on the  
19 agenda."

20 Do you see that?

21 A I do.

22 Q Who was that?

1 A I do not recall.

2 Q Was it Ed Voyles?

3 A I do not recall.

4 Q You don't remember anything about  
5 the -- about the -- about the guest?

6 A I do not recall.

7 Q If you would turn the page to page 11  
8 of Exhibit 3. At the top -- well, I'm sorry, back  
9 up to the bottom of page 10. Do you see where you  
10 ask, "Can I legally give out minutes of the board  
11 before they have been approved by the board?"

12 Do you see that?

13 A Yes.

14 Q Had you been asked by Robert Sinners  
15 to produce minutes of board meetings before they  
16 were approved by the Board?

17 MS. LAROSS: Objection as to form.

18 THE WITNESS: I do not recall.

19 BY MR. BROWN:

20 Q You might have been, might not have  
21 been?

22 MR. MILLER: Object to form.

1 THE WITNESS: I do not recall.

2 BY MR. BROWN:

3 Q Let me direct -- let me mark as  
4 Exhibit 4 Tab 27. Oh, wait. Let's wait on that.  
5 Hang on a second. Go back to -- I'm sorry, I made  
6 a mistake. If you'd go back to Exhibit 3, page 15.

7 Are you with me?

8 MS. MARKS: Getting there.

9 BY MR. BROWN:

10 Q If you look at Exhibit 3 right in the  
11 middle, November 19th, Mr. Chaney says, "Trump's  
12 man wants them." Do you see that?

13 A I do.

14 Q Who is Trump's man?

15 A I have no idea.

16 Q Did you know at the time?

17 A No, sir.

18 Q Did you ask him, "Who -- what are you  
19 talking about? Who is Trump's man"?

20 A Not that I recall.

21 Q You just said, "Okay," right,  
22 indicating that you probably knew who Trump's man

1 was or you just didn't know?

2 A He was -- Eric is a board member.

3 MR. MILLER: Object to form.

4 You can answer.

5 THE WITNESS: Eric is a board member,  
6 I answer to him. If he asked me to do something, I  
7 did it.

8 BY MR. BROWN:

9 Q Were you -- and you never asked him  
10 who Trump's man was?

11 A Not that I recall.

12 Q Why would an election board member be  
13 funneling information to Trump's man?

14 MR. MILLER: Objection to form.

15 BY MR. BROWN:

16 Q Did he tell you why he needed to give  
17 it to Trump's man?

18 A No, sir, not that I recall.

19 Q And what was it that you were giving  
20 to Mr. Chaney so that he could give it to Trump's  
21 man?

22 A I do not recall.

1 Q Do you see where Mr. Chaney says,  
2 "Thereafter the Secretary of State and Governor"?  
3 Do you see that?

4 A Yes.

5 Q Do you know who he was referring to  
6 with the pronoun "their" or "they"?

7 A I do not.

8 Q In response you said, "Good." Do you  
9 see that?

10 A I do.

11 Q I take it you were supportive of  
12 going after the Secretary of State and the  
13 Governor?

14 A I don't know how to answer that.

15 Q Well, were you?

16 A Excuse me?

17 Q Were you supportive of efforts to go  
18 after the Secretary of State and the Governor?

19 MR. MILLER: I'm not going to let her  
20 answer that when she's going to take the Fifth.

21 MR. BROWN: I -- I hear that you're  
22 take the Fifth, Jonathan. Is the witness going to

1 take the Fifth?

2 MR. MILLER: I'm asking her to take  
3 the Fifth, which means you have to say that, Dear.

4 THE WITNESS: As advised by my  
5 attorney, I take the Fifth.

6 MR. BROWN: Okay. Jonathan, do you  
7 have the full Fifth Amendment recitation that --  
8 that we can use or are you just going to use that?

9 MR. MILLER: I'm just going to use  
10 that.

11 MR. BROWN: Okay.

12 BY MR. BROWN:

13 Q You then say, "I'll help them any way  
14 I can." Do you see that?

15 A I do.

16 Q And what did you mean by that?

17 A I'll help them any way I can.

18 Q And did you?

19 MR. MILLER: She's -- take the Fifth.

20 THE WITNESS: I'm going to take the  
21 Fifth Amendment.

22



1 BY MR. BROWN:

2 Q If you would turn the page to page  
3 16 -- I'm sorry, page 16. Do you see that?

4 A I do.

5 Q Do you see where there is a little  
6 advertisement of something featuring Lin Wood and  
7 Sidney Powell? Do you see that?

8 A I do.

9 Q And did you communicate with either  
10 Sidney Powell or Lin Wood about this time?

11 MR. MILLER: She's going to take the  
12 Fifth on that.

13 THE WITNESS: I take the Fifth.

14 BY MR. BROWN:

15 Q Did you ever communicate with Sidney  
16 Powell or Lin Wood?

17 MR. MILLER: I think you can answer  
18 that.

19 THE WITNESS: Not that I'm aware of.

20 BY MR. BROWN:

21 Q At the bottom of the page you  
22 indicate on December 2, that, "Trump is going to be

1 in Valdosta Saturday afternoon!!! Campaign for  
2 Perdue and Kelly."

3 Do you see that?

4 A I do.

5 Q You say, "I need to get to him," were  
6 you referring to David Perdue or Donald Trump?

7 A I do not remember.

8 Q Did you ever -- did you ever talk to  
9 David Perdue or Donald Trump?

10 MR. MILLER: You can answer.

11 THE WITNESS: Not that I'm aware of.

12 BY MR. BROWN:

13 Q Okay. Is talking to Donald Trump  
14 something that you might -- it might have happened  
15 and you just don't remember doing it?

16 A I've never spoke to Donald Trump.

17 Q Okay. Did you ever speak with David  
18 Perdue?

19 A Not that I'm aware of.

20 Q In the next text you say, "So who do  
21 we know that can get us" -- and then it's -- "Calle  
22 of talking to him!!"

1 Do you know what that meant, what you  
2 meant?

3 A No, sir.

4 Q Is that a typo or is that a person or  
5 what?

6 A I don't know.

7 Q Do you know a Calle?

8 A Excuse me?

9 Q Do you know a person named Calle,  
10 C-A-L-L-E?

11 A Yes, sir.

12 Q Who's that?

13 A A pageant friend.

14 Q A -- a what? I just didn't hear you.

15 A A pageant girl.

16 Q Okay. Is that who you were referring  
17 to here?

18 A No, sir.

19 Q And then in response, Mr. Chaney says  
20 "Dominic's buddy." Do you see that?

21 A I do.

22 Q And do you know he was -- who he was

1 referring to when he says "Dominic"?

2 A I do.

3 Q Who's that?

4 A Dominic LaRiccia.

5 Q And who's he?

6 A He's a pest control guy from Douglas  
7 who is, I think, a House Representative.

8 Q And then who is Ross Goodman?

9 A I do not know.

10 Q And if you would turn to page 17. Do  
11 you see that?

12 Do you see the text at the top where  
13 you tell Mr. Chaney, "We need to talk to him so we  
14 can get to talk to Trump and explain in person"?

15 Do you see that?

16 A I do.

17 Q What were you going to explain to  
18 Trump in person?

19 A I do not remember.

20 Q Okay. You're talking to Eric Chaney  
21 about explaining something to President Trump  
22 shortly after the general election and you're

1 telling me you don't remember what you wanted to  
2 talk to President Trump about?

3 A Correct.

4 Q Okay. Ms. Hampton, you're under  
5 oath. I don't need for you to recall every  
6 specific thing that you wanted to talk to Trump  
7 about, but do you remember generally what you  
8 wanted to talk to Trump about?

9 A At this time no, I do not.

10 Q You don't remember anything about it?

11 A No, sir.

12 Q If you would drop down to the middle  
13 of page 17 of Exhibit 3, do you see where you say  
14 to Mr. Chaney, "Are you going to be here with Ed  
15 and Robert Preston"?

16 Do you see that?

17 A I do.

18 Q And is the Ed, Ed Voyles?

19 A Yes.

20 Q And who is Robert Preston?

21 A Reporter in Douglas.

22 Q And what was the occasion for meeting

1 with Mr. Voyles and Robert Preston?

2 A I do not remember.

3 Q In the next entry you'll see  
4 Mr. Chaney asks, "Think we can get James to give a  
5 statement." Do you see that?

6 A I do.

7 Q He's referring to James from  
8 Dominion, correct?

9 A Yes.

10 Q And what was your understanding of  
11 what statement James might have given, or what was  
12 it about?

13 A At this time I don't remember.

14 Q Then you say, "No, he does not want  
15 to be involved." Do you see that?

16 A I do.

17 Q And does that jog your recollection  
18 about what Mr. Chaney wanted to get from James in a  
19 statement?

20 A Not at this time.

21 Q If you go down to December 9, and you  
22 say, "Does Wendell think he's going to change the

1 vote to not go tomorrow?" Do you see that?

2 A I do.

3 Q And that's Board Member Wendell  
4 Stone. Is that right?

5 A Correct.

6 Q And what were you referring to in  
7 that text message?

8 A I do not remember.

9 Q Okay. Then Mr. Chaney says, "I'm  
10 about to puss this joker off." And you say, "Good  
11 cause I'm getting pissed."

12 Do you see that?

13 A I do.

14 Q And do you recall anything about this  
15 exchange?

16 A I do not.

17 Q If you'd go to the next page, page 18  
18 of Exhibit 3, you will see an exchange starting in  
19 December -- on December 11th at 2:19. You say,  
20 "The funny thing the Dominion guys can not get the  
21 computer to work. They are both in there and on  
22 Facetime."

1 Do you see that?

2 A I do.

3 Q And do you recall that event?

4 A I do.

5 Q What was going on?

6 A That was when the State was there to  
7 investigate and they brought the two Dominion reps  
8 with them and they were trying -- Dominion was  
9 in -- the two guys from Dominion was in the -- what  
10 I used to call the GEMS room trying to get the  
11 scanner to communicate with the computer.

12 Q And were they able to do so?

13 A I'm sorry?

14 Q Were they able to do so?

15 A Were they able to get the computer to  
16 communicate?

17 Q Yes.

18 A I mean the scanner to communicate?

19 Q Yes.

20 A No.

21 Q And what was -- what was the purpose  
22 of the State being down there at that time?



1 MS. LAROSS: Objection as to form.

2 THE WITNESS: That's when they were  
3 investigating the recount.

4 BY MR. BROWN:

5 Q And what did they do when they were  
6 there in their investigation of the recount other  
7 than trying to get the scanner to communicate with  
8 the system?

9 MS. LAROSS: Objection as to form.

10 THE WITNESS: That's when we did  
11 the -- that's when we hand counted the ballots?

12 BY MR. BROWN:

13 Q Okay. Who actually did the -- the  
14 hand counting?

15 A The three investigators from the  
16 State.

17 Q Anybody else?

18 A They counted them.

19 Q And that was the final count that you  
20 did in Coffee County?

21 A Yes, sir.

22 Q Let me direct your attention to the

1 next page, which is page 19 of Exhibit 3. And do  
2 you see the -- I guess, are these photographs here  
3 that you texted to Mr. Chaney?

4 A Yes.

5 Q And what do the photographs show?

6 A The poll pads.

7 Q And what are the poll pads showing?

8 A Netflix.

9 Q So you could get Netflix on a poll  
10 pad?

11 A That's correct.

12 Q Did you ever tell Russ Ramsland about  
13 this feature of the poll pads?

14 A Not that I recall.

15 Q If would turn the page to page 20 of  
16 Exhibit 3. What do the photographs at the top of  
17 the page of page 20 of Exhibit 3 show?

18 A A computer screen.

19 Q And what's shown on that computer?

20 A Solitaire.

21 Q So the -- is that the ICC scanner  
22 computer?

1           A       I don't remember the name of it, but  
2       it's the one that the scanner was hooked to.

3           Q       And it's connected to the internet?

4                   MS. LAROSS:  Objection as to form.

5                   THE WITNESS:  I do not know.

6       BY MR. BROWN:

7           Q       Well -- okay.  So the Solitaire might  
8       have been a -- just an application on the -- on  
9       that particular computer?

10          A       Correct.

11          Q       And then if you look at the second  
12       photo on page 20 of Exhibit 3, what does that show?

13          A       The EMS server computer.

14          Q       And what's on the screen there?

15          A       That's the Window home screen.

16          Q       What is the significance of that to  
17       you?

18                   MR. MILLER:  Object to form.

19                   MS. LAROSS:  Objection as to form.

20                   THE WITNESS:  It shows games.

21       BY MR. BROWN:

22          Q       And are the games in an app that's on

1 the computer or are those accessed through the  
2 internet? Do you know?

3 A An app on the -- I mean the Windows  
4 home.

5 Q Right.

6 MR. MILLER: She can answer, but I'm  
7 going to object to form.

8 THE WITNESS: It's just the Windows  
9 home, like the little icon down there.

10 BY MR. BROWN:

11 Q Okay. Who is Preston Haliburton?

12 A I have no idea.

13 Q Do you see where he -- his name and  
14 e-mail address is texted to you by Eric Chaney?

15 A I do.

16 Q And do you know why -- well, what is  
17 your understanding of the reason you would be given  
18 Preston Haliburton's e-mail address.

19 MR. MILLER: Object to form.

20 THE WITNESS: I do not remember.

21 BY MR. BROWN:

22 Q Tell me about your communications

1 with Mr. Haliburton.

2 A I do not know a Mr. Haliburton.

3 Q Do you recall ever communicating with  
4 him?

5 A No, sir.

6 Q Do you know who he is?

7 A No, sir.

8 Q In the -- if you'd go to the next  
9 page, it's page 22 of Exhibit 3. Do you see that?

10 A I do.

11 Q Let me direct your attention to the  
12 January 6th entry where you say to Mr. Chaney,  
13 "Scott Hall is on the phone with Cathy about  
14 wanting to come scan our ballots from the general  
15 election like we talked about the other day. I am  
16 going to call you in a few."

17 Do you see that?

18 A I do.

19 Q And how did -- how did you know that  
20 Scott Hall was on the phone with Cathy?

21 MR. MILLER: Object to form.

22 THE WITNESS: I don't recall.

1 BY MR. BROWN:

2 Q Was Cathy Latham just standing in  
3 front of you talking to Mr. Hall probably?

4 A I don't --

5 MR. MILLER: Object to form.

6 BY MR. BROWN:

7 Q You don't remember?

8 A Correct.

9 Q And you knew Scott Hall by this time,  
10 right?

11 MR. MILLER: Object to form.

12 THE WITNESS: No, sir.

13 BY MR. BROWN:

14 Q So you said Scott Hall, but you  
15 didn't know who he was. I guess did Mr. Chaney  
16 know who he was?

17 MR. MILLER: Object to form.

18 THE WITNESS: I do not know.

19 BY MR. BROWN:

20 Q In this text you say, "Like we talked  
21 about the other day." So you spoke with Mr. Chaney  
22 about scanning ballots. Is that right?

1 MR. MILLER: Let me advise my client,  
2 please.

3 (Counsel speaking to client off the  
4 record.)

5 THE WITNESS: I'll take the Fifth  
6 Amendment.

7 BY MR. BROWN:

8 Q And scanning ballots was code for  
9 making a forensic copy of the entire Coffee County  
10 Election System, right?

11 A I'll take the Fifth.

12 Q Scott Hall wasn't about to come just  
13 to scan ballots, was he?

14 MR. MILLER: Object to form.

15 THE WITNESS: I do not know.

16 BY MR. BROWN:

17 Q You don't remember when you first  
18 learned the name Scott Hall?

19 A No, sir.

20 Q You didn't know who he was on  
21 January 6th?

22 A I do not recall.

1 Q The Cathy you refer to here is Cathy  
2 Latham?

3 A Yes.

4 Q Who is she?

5 A Head of the Republican Party.

6 Q Right.

7 So what is the head of the Republican  
8 Party doing -- arranging for someone to come scan  
9 the ballots?

10 MR. MILLER: Object to form.

11 THE WITNESS: I do not know.

12 BY MR. BROWN:

13 Q She wasn't associated formally with  
14 the election's office, right?

15 A She was the Republican who, along  
16 with a Democrat and a board member, that we used  
17 for vote review panel.

18 Q Oh, I see. So the Democrat and Cathy  
19 Latham were going to work with Scott Hall to -- to  
20 scan ballots?

21 MR. MILLER: Object to form.

22 THE WITNESS: That's not what I said.



1 BY MR. BROWN:

2 Q Right, but was she -- was she  
3 involved with Scott Hall in her capacity as a  
4 member of the vote review panel or just a stranger  
5 from the Republican Party?

6 MR. MILLER: Object to form.

7 THE WITNESS: Not as the vote -- vote  
8 review panel, no.

9 BY MR. BROWN:

10 Q Okay. And then tell me about the  
11 conversation you had with Eric Chaney about,  
12 "Someone coming to scan our ballots for the general  
13 election."

14 A I do not recall.

15 Q You don't remember talking with Eric  
16 Chaney about someone coming to scan ballots for the  
17 general election?

18 A I'll take the Fifth Amendment.

19 Q And as of January -- well, just  
20 fast-forward a little bit. January 7th is when the  
21 team from SullivanStrickler came to Coffee County,  
22 right?

1           A       I don't remember the date.

2           Q       All right. Let me just say for the  
3 record, and you don't have to believe me, but just  
4 for moving forward, the day before they got there,  
5 did you know they were coming the next day?

6           A       I don't recall.

7           Q       So SullivanStrickler shows up at your  
8 election's office with a bunch of computer  
9 equipment, knock on the door, you never -- never  
10 heard of them coming and you said, "Come on in," or  
11 did you know in advance that they were going to be  
12 down there?

13          A       I take the Fifth.

14          Q       When the SullivanStrickler team  
15 arrived, what was your understanding of what they  
16 were there to do?

17          A       I take the Fifth.

18          Q       Prior to their arrival, the days or  
19 week before, when did you first learn that someone  
20 might be coming to Coffee County to make --

21          A       I take the Fifth.

22          Q       -- to make copies of the election

1 software?

2 A I take the Fifth Amendment.

3 Q Did you, by the force of your own  
4 Authority, allow SullivanStrickler's team to make  
5 the forensic copies of the Coffee County election  
6 software?

7 MR. MILLER: Bruce, can we go off the  
8 record for just a moment?

9 MR. BROWN: Sure.

10 VIDEOGRAPHER: Hold on for a second.  
11 We are going off the record at 12:01.

12 (Recess from 12:01 p.m. to 12:12 p.m.)

13 VIDEOGRAPHER: We are on the record  
14 at 12:12.

15 BY MR. BROWN:

16 Q Ms. Hampton, let me go at it this  
17 way: The team from SullivanStrickler was inside  
18 the Coffee County Election's Office on January 7,  
19 2021, correct?

20 A I don't remember the date.

21 Q But they were in there in early  
22 January, correct?

1 A Yes.

2 Q And there's a couple of possibilities  
3 as to under what authority they were there, and  
4 that's what I want to ask you about. The first  
5 possibility is that they snuck in there and you did  
6 not see them and they copied the election software  
7 without you knowing about it. That's Option 1, you  
8 didn't know about it, they just did it.

9 Did that -- was that -- did that  
10 happen?

11 A No.

12 Q So you knew about it?

13 A I didn't say that.

14 Q Okay. You were there when they were  
15 copying the election software, correct?

16 A Yes.

17 Q Did you know what they were copying?

18 MR. MILLER: Object to form.

19 THE WITNESS: Yes.

20 BY MR. BROWN:

21 Q What were they copying?

22 MR. MILLER: Object to form.

1 THE WITNESS: I don't know how -- I'm  
2 trying to think of how to word it. Hold on.

3 BY MR. BROWN:

4 Q Were they copying everything?

5 A "Everything" is a broad word.

6 MR. MILLER: Object to form.

7 BY MR. BROWN:

8 Q Okay. What didn't they copy?

9 MR. MILLER: Object to form.

10 THE WITNESS: I don't know what they  
11 didn't copy.

12 BY MR. BROWN:

13 Q Okay. Let's go through each thing  
14 then.

15 MR. MILLER: Bruce, why don't you go  
16 back to the question that you asked before we took  
17 the break.

18 BY MR. BROWN:

19 Q Did they copy the Dominion Election  
20 Management Server software?

21 MR. MILLER: Bruce, can you repeat  
22 that question?

1 BY MR. BROWN:

2 Q Did they copy the EMS server, the  
3 EMS?

4 A I take the Fifth.

5 Q Did they copy the ImageCast Central  
6 Tabulator?

7 A I take the Fifth.

8 Q Did they copy the laptop containing  
9 the Dominion software?

10 A I take the Fifth.

11 Q Did they copy the 20 KNOWiNK poll  
12 pads?

13 A I take the Fifth.

14 Q Did they copy CompactFlash cards used  
15 to program the -- the ImageCast precinct scanner  
16 tabulators?

17 A I take the Fifth.

18 Q Did they copy USB thumb drives used  
19 to program ImageCast X -- capital X --  
20 ballot-marking devices?

21 A I take the Fifth.

22 Q Did they get passwords for all of

1 those equipments -- equipment from you?

2 A I take the Fifth.

3 Q I'm going to refer to what I just  
4 described in my questions, and that is the copying  
5 of the election equipment in Coffee County as  
6 "SullivanStrickler's work."

7 Do you follow me?

8 A Okay.

9 Q Did you give SullivanStrickler  
10 permission to do their work on January 7, 2021?

11 A I did not do anything without the  
12 direction of the Board.

13 Q And who specifically on the Board  
14 gave you the Authority to give SullivanStrickler  
15 the permission to do their work?

16 A Eric.

17 Q Who else?

18 Is that Eric Chaney?

19 A Correct.

20 Q Anybody else on the Board?

21 MR. MILLER: Just tell him the truth.

22 THE WITNESS: Ernestine.

1 BY MR. BROWN:

2 Q Who else?

3 A Matthew.

4 Q Who else?

5 A I can't recall.

6 Q So those three, you told -- well,  
7 describe for me the circumstances in which you  
8 received authority from these three board members  
9 to give authority to SullivanStrickler to come into  
10 the election county offices and Coffee -- and copy  
11 the election system?

12 A I don't understand your question.

13 Q Did you have a meeting to talk about  
14 it? Did you text them? Did you call them? Did  
15 you all meet there?

16 How did they convey to the authority  
17 to allow SullivanStrickler to do their work on  
18 January 7?

19 A I don't really recall.

20 Q Okay. If someone were to say to  
21 doubt you and to say, "No, you did this all on your  
22 own, you did not have the authority of the Board,"



1 what would you point to or is there any evidence  
2 that you're aware of that these board members did  
3 give you this authority or direction?

4 MR. MILLER: Object to form.

5 THE WITNESS: I don't remember the  
6 actual way that Eric told me about it.

7 BY MR. BROWN:

8 Q Did -- did Eric -- did Ernestine tell  
9 you directly or was this secondhand through Eric?

10 A Through Eric.

11 Q What about Matthew, did Matthew tell  
12 you directly or was it through Eric?

13 A Through Eric.

14 Q And so Eric Chaney told you in effect  
15 that these board members want you to allow someone  
16 to come in and copy the election software, correct?

17 MR. MILLER: Object to form.

18 THE WITNESS: Yeah.

19 BY MR. BROWN:

20 Q And when in relation to January 7,  
21 which is the day they got there, did Mr. Chaney  
22 convey that to you?

1           A       I don't remember that.

2           Q       A couple days before? A day before?  
3       Months before? After?

4           A       I don't remember that.

5           Q       Was it clear to you that Mr. Chaney  
6       was giving you authorization to give  
7       SullivanStrickler the authorization, not just to  
8       scan ballots, but to actually make forensic copies  
9       of the election software?

10                   MR. MILLER: Object to form.

11                   THE WITNESS: At the time I didn't  
12       know that it was -- I can't even say their legal  
13       name, but he never told me the actual name.

14       BY MR. BROWN:

15           Q       Right, but -- and I -- you understand  
16       that the -- the -- my questions aren't directed  
17       towards whether the authority was given to  
18       SullivanStrickler or to somebody else, but just to  
19       the people who were going to do this work, the  
20       authority was to be given, not only to scan  
21       ballots, but to, in fact, make copies of the entire  
22       software, correct?

1           A       Authority was given, yes.

2           Q       Okay. By the -- by Eric Chaney to  
3 you and from you to the people who came to do the  
4 work, correct?

5           A       Correct, because I did as Eric, as a  
6 board member, directed.

7           Q       Okay. And what was your  
8 understanding of the purpose of doing this work?

9                   MR. MILLER: Object to form.

10                  THE WITNESS: The purpose, is that  
11 what you asked?

12 BY MR. BROWN:

13           Q       Yes.

14           A       To see why the scanner would not  
15 function properly, I guess is the right technical  
16 term.

17           Q       And how was copying the entire  
18 election management system going to achieve the  
19 purpose of seeing why the scanner would not  
20 function properly?

21                   MR. MILLER: Object to form.

22                  THE WITNESS: I do not know.

1 BY MR. BROWN:

2 Q Why didn't you just put in a service  
3 order for the scanner?

4 MR. MILLER: Object to form.

5 THE WITNESS: Stating multiple times  
6 that the scanner was not working properly.

7 BY MR. BROWN:

8 Q Okay. So because the State was not  
9 responding to your request to get your equipment  
10 fixed, Coffee County elected to allow a company to  
11 come in and copy the software, correct?

12 MS. LAROSS: Objection as to form.

13 MR. MILLER: Concur.

14 THE WITNESS: I don't know how to  
15 answer that one.

16 BY MR. BROWN:

17 Q "Yes" is good. "Yes" is good.

18 MR. MILLER: Now, you're not going  
19 to -- it's a yes-or-no question.

20 THE WITNESS: Right.

21 Repeat the question.

22 MR. BROWN: Ms. Newland, if you could

1 repeat the question, please.

2 (The reporter read as requested.)

3 THE WITNESS: Coffee County wanted  
4 help.

5 BY MR. BROWN:

6 Q Right. I need you to answer the  
7 question. I understand they wanted help, and we  
8 can get to that, but I need you to answer the  
9 question.

10 And if this is that you -- you were  
11 not getting the help that you needed from the  
12 State, so you needed in a sense to -- to do it on  
13 your own, right?

14 MS. LAROSS: Objection as to form.

15 MR. MILLER: If it's the correct  
16 answer, then that's the correct answer.

17 THE WITNESS: Yes.

18 BY MR. BROWN:

19 Q And tell me what you did to try to  
20 get help from the State -- or the Secretary of  
21 State before deciding that you needed to try to get  
22 help on your own.

1           A       There was e-mails sent to the  
2       Secretary of State liaison, there was phone calls  
3       made, there were letters sent from the Board.

4           Q       And the subject of the communications  
5       with the liaison and the phone calls and the  
6       letters, was what specific mail functioning of the  
7       system?

8           A       I'm sorry, you broke up on that.

9           Q       Yeah. What specifically were you  
10       referring -- what was the precise issue that you  
11       were trying to have the Secretary address in your  
12       communications with the liaison, with the phone  
13       calls and with the letters?

14          A       Why the scanner was not scanning the  
15       ballots. It was kicking them back or saying "not  
16       scanned." It would say a misread or so have you,  
17       and we would look at the ballot, there were no  
18       marks, stray marks that is, on the ballot, no  
19       reason for it not to be read.

20          Q       And did you have an understanding  
21       with SullivanStrickler or with anybody else, that  
22       once -- that it was -- that they were going to fix

1       it, SullivanStrickler was going to fix it?

2                       MR. MILLER: Object to form.

3                       THE WITNESS: No, sir.

4       BY MR. BROWN:

5               Q       Right.

6                       I mean, you -- you let these people  
7       into your election's office, they come in and they  
8       copy all your election software. And the purpose  
9       of that is to get the scanner fixed, did they fix  
10      it?

11                      MR. MILLER: Object to form.

12                      THE WITNESS: Not that I'm aware of.

13      BY MR. BROWN:

14               Q       Did you call them up after they came  
15      and made the copies and say, "Hey, look, how is the  
16      fix coming on our scanner"?

17                      Did you --

18               A       No, sir.

19               Q       Did you ever follow up to see that  
20      the purpose of allowing them in there had been  
21      achieved?

22               A       No, sir.

1 Q Why not?

2 MR. MILLER: Object to form.

3 THE WITNESS: Because I answer to  
4 Eric.

5 BY MR. BROWN:

6 Q So you -- you didn't follow up on  
7 whether the purpose of allowing them to copy had  
8 been achieved because you report to Eric. Is that  
9 right?

10 A I never questioned it.

11 Q I understand that, but the reason for  
12 it was to address the problems with the scanner.  
13 The State wasn't doing it, so these other people  
14 came in to copy it, but then no effort was made, I  
15 take it, to follow up with that company to see if  
16 any progress had been made in seeing whether they  
17 could fix the scanner, right?

18 A I don't know your question. I'm  
19 sorry.

20 Q Well, you sent something out to get  
21 fixed, you follow up with them and say, "Hey, is it  
22 fixed," right?



1                   Here you --

2                   A        I never sent anything out.

3                   Q        Pardon me?

4                   A        I never sent anything out.

5                   Q        Okay. They came in to get it, right?

6                   A        No.

7                   Q        The reason why --

8                   A        They came to the office.

9                   Q        I understand that you're saying that  
10           they came in there and they made a copy. And the  
11           purpose of them doing that was to address the  
12           scanner issues that you identified, correct?

13                   MR. MILLER: Object to form.

14                   THE WITNESS: Correct.

15                   BY MR. BROWN:

16                   Q        Right.

17                                But after they left, you did not  
18           follow up with anyone ever to determine whether the  
19           scanner issue had been addressed, right?

20                   A        I don't recall.

21                   Q        Do you recall if Mr. Chaney ever did  
22           that?

1 A I do not recall.

2 Q Did you ever get any feedback from  
3 anyone based upon their analysis of the copies of  
4 Coffee County's software that were made on  
5 January 7?

6 A No, sir.

7 Q Did you ask for any?

8 A I don't recall.

9 Q Now you testified that a reason for  
10 allowing SullivanStrickler to come in there and  
11 make all the copies was to address the scanner  
12 issue. Was there any other reason?

13 MR. MILLER: Object to form.

14 THE WITNESS: I don't recall.

15 BY MR. BROWN:

16 Q I'm not suggesting that you needed  
17 it, but did you get any authority from any lawyer  
18 to allow SullivanStrickler to come in there and  
19 copy the election software?

20 A I got the authority from Eric,  
21 that's --

22 Q Do you know if he had run it past

1 Tony Rowell?

2 MR. MILLER: Object to form.

3 THE WITNESS: I do not know.

4 BY MR. BROWN:

5 Q Do you know if he had run it past any  
6 lawyer?

7 MR. MILLER: Object to form.

8 THE WITNESS: I do not know.

9 BY MR. BROWN:

10 Q Did you -- do you or, to your  
11 knowledge, did anyone associated with Coffee County  
12 ask anyone associated with Dominion whether it be  
13 appropriate to allow a third party to come in and  
14 copy the election software?

15 MR. MILLER: Object to form.

16 THE WITNESS: I do not know.

17 BY MR. BROWN:

18 Q Did you tell Dominion at any time  
19 that third parties had come in and made forensic  
20 copies of Coffee County's election software?

21 A I do not recall.

22 Q Did you ever discuss at any time with

1 anybody from Dominion the fact that a third party  
2 had made forensic copies of Coffee County's  
3 election system software?

4 A I don't recall.

5 Q Do you have any reason to believe  
6 that Dominion, prior to your termination as the  
7 election supervisor, knew that third parties had  
8 come in and made forensic copies of the election  
9 software?

10 MR. MILLER: Object to form.

11 THE WITNESS: Can you repeat that,  
12 please?

13 BY MR. BROWN:

14 Q Do you have any reason to believe  
15 that Dominion knew that third parties had come in  
16 to election's office and made the copies of the  
17 election software?

18 A I can't answer to what Dominion knew  
19 and didn't know.

20 Q No, you can't. I said, do you have  
21 any reason to believe, in other words, you told  
22 them, someone else told them, you saw it on the

1 internet, it was Twittered?

2 There's all sorts of ways that you  
3 might have known that they might have had some  
4 knowledge of that. That's why I'm asking it that  
5 way. It may have been are poorly formed.

6 For all you know -- let me ask it  
7 this way: For all you know, Dominion had no idea  
8 that a third party had come in to make copies of  
9 the election equipment in Coffee County, correct?

10 MR. MILLER: Is that prior to or  
11 after it was done?

12 MR. BROWN: Prior to or after.

13 THE WITNESS: Not that I recall.

14 BY MR. BROWN:

15 Q Are you aware of any claim or  
16 complaint or litigation that Dominion threatened  
17 relating to the copying of Coffee County's election  
18 software?

19 A I'm not aware.

20 Q You testified that at some point  
21 before January 7, Mr. Chaney conveyed to you the  
22 direction that a third party should be allowed to

1       come in to copy the software, correct?

2               A       I'm sorry. Say that again.

3               Q       At some point, a couple days, maybe a  
4       week, before January 7, Mr. Chaney conveyed to you  
5       that you should allow a third party to come in and  
6       copy the election software, correct?

7               A       Correct.

8               Q       What preparations did you need to  
9       make or did you make before January 7th, for  
10       SullivanStrickler's visit to Coffee County?

11              A       Ask that again, please.

12              Q       They came on January 7th. What did  
13       you need to do beforehand to prepare for their  
14       visit?

15                      I mean, it may be nothing, I don't  
16       know.

17              A       I did nothing.

18              Q       And Cathy Latham told you that they  
19       were coming in advance?

20              A       I don't recall that.

21              Q       Who -- who told you?

22              A       Eric.

1 Q Okay. So Eric told you "They're  
2 coming tomorrow," something to that effect?

3 A I don't recall what he told me. No,  
4 sir, I don't remember that.

5 Q Prior to January 7th, did you talk to  
6 anyone other than Eric Chaney and Cathy Latham  
7 about the people coming to make the copies on  
8 January 7th?

9 A Are you asking did I talk to someone?

10 Q Right. Anybody else?

11 A No, sir, not that I recall.

12 Q Do you know who was paying  
13 SullivanStrickler to do their work?

14 A No, sir.

15 Q You never learned that?

16 MR. MILLER: Object to form.

17 THE WITNESS: I do not know.

18 BY MR. BROWN:

19 Q Did you ever ask?

20 A No, sir.

21 Q Did you know that they had been hired  
22 by Sidney Powell?

1           A       No, sir.

2           Q       When is the first you learned that  
3 they had been hired by Sidney Powell, if ever?

4                   MR. MILLER: Object to form.

5                   THE WITNESS: In a deposition.

6 BY MR. BROWN:

7           Q       What deposition?

8           A       I don't remember that one.

9           Q       But recently, right?

10          A       Correct.

11          Q       Did you know that Sidney Powell at  
12 the time was Cathy Latham's lawyer?

13                   MR. MILLER: Object to form.

14                   THE WITNESS: No, sir.

15 BY MR. BROWN:

16          Q       Do you know Jim Penrose?

17          A       No, sir.

18          Q       Have you communicated -- did you  
19 communicate with Jim Penrose?

20          A       Not that I'm aware of.

21          Q       You don't recall that -- that name  
22 doesn't ring a bell at all?



1 A It rings a bell, but...

2 Q But you don't remember anything other  
3 than maybe recognizing the name?

4 A Correct.

5 Q Do you know -- if the -- if the --  
6 the reason why SullivanStrickler made the copies  
7 from your standpoint was because the scanner wasn't  
8 working right, why was Sidney Powell paying for it?

9 A I didn't --

10 MR. MILLER: Object to form.

11 THE WITNESS: I didn't know she was.

12 BY MR. BROWN:

13 Q Was it your understanding based upon  
14 your directions from Mr. Chaney that there should  
15 really be no restrictions on what SullivanStrickler  
16 could copy in the office?

17 A I'm sorry, you're breaking up. Can  
18 you repeat that?

19 Q I'm sorry.

20 Based upon your discussions with  
21 Mr. Chaney before January 7th, was it your  
22 understanding that SullivanStrickler, or whoever

1 was going to come, should be allowed without  
2 restriction to copy what they needed to copy in the  
3 election's office?

4 MR. MILLER: I'm going to object to  
5 form.

6 But you can answer the question if  
7 you know.

8 THE WITNESS: I don't recall.

9 BY MR. BROWN:

10 Q Okay. On January 7th, the day that  
11 they were there, did SullivanStrickler finish their  
12 work copying all of the election equipment?

13 A I don't remember.

14 Q Do you recall when they left, did  
15 they say, we need to get -- we still need to get  
16 this done or that done, or do you just don't recall  
17 one way or the other?

18 A I don't recall.

19 Q Okay. Let's go back to Exhibit 3.  
20 Is that in front of you, ma'am?

21 A Yes, it is.

22 Q If you would turn -- you may be there

1 already, but if you would turn to page 22.

2 A Okay.

3 Q At the bottom of the page you text to  
4 Mr. Chaney, "Hey, are you coming" -- and this is at  
5 10:18 a.m., "Hey, are you coming to the office? I  
6 need a board member to be here when we transfer  
7 ballots."

8 Do you see that?

9 A I do.

10 Q And -- and Mr. Chaney and you had  
11 worked out a -- some sort of code where when you  
12 said something like "transferring ballots," what  
13 you meant was make a complete forensic copy of  
14 every piece of election software in the office,  
15 right?

16 MR. MILLER: Object to form.

17 THE WITNESS: Incorrect.

18 BY MR. BROWN:

19 Q Okay. And did you need him to be  
20 there to transfer ballots?

21 A Yes.

22 Q Okay. Why?

1           A       Because it was the runoff election  
2       and we had -- I'm trying to think of the word. I  
3       went totally blank. When they go to the wrong  
4       precinct and they vote on a paper ballot that they  
5       need to transfer to the correct precinct so the  
6       vote will go to the right precinct, provisional.

7           Q       Oh, provisional votes.

8                    So that's why you needed Mr. Chaney  
9       there?

10          A       Yes, sir.

11          Q       So you need Mr. Chaney there every  
12       time you had a provisional ballot?

13          A       We had to have a board member there,  
14       yes, sir.

15          Q       Okay. And that -- the same day was  
16       when SullivanStrickler was in there copying your  
17       equipment. Is that right?

18          A       I don't recall that.

19          Q       Right.

20                    You'll see at the -- on the next  
21       page, which is page 23 of 24 of Exhibit 3, at the  
22       top you'll see a phone number.

1 A I do.

2 Q And do you recall receiving that  
3 phone number from Mr. Chaney?

4 A It's on the screen, so I guess it was  
5 there.

6 Q Do you recall calling that number?

7 A No, sir.

8 Q For the record, that number is the  
9 number for Robert Sinners. Do you know who he is?

10 A I do now.

11 Q Did you ever call Mr. Sinners?

12 A No, sir, not that I'm aware of.

13 Q Do you know why you received that  
14 phone?

15 A I actually thought that was the  
16 number to his -- to Eric's Signal account.

17 Q So you did try?

18 A No, sir, I did not.

19 Q Oh.

20 A I said I thought.

21 Q And then immediately after texting  
22 Robert Sinners' phone number to you, he says,

1 "Let's switch to Signal." Do you see that?

2 A Correct.

3 Q Okay.

4 A I didn't learn that was Robert  
5 Sinners' number until the deposition.

6 Q I understand.

7 And then the next day you say, "Did  
8 you check signal?" Do you see that?

9 A I do.

10 Q And what -- what was the substance of  
11 your communications with Mr. Chaney via Signal?

12 A I do not recall.

13 Q Pardon me?

14 A I do not recall.

15 Q And have you attempted to recover  
16 your Signal text messages?

17 A I did.

18 Q And were you successful?

19 A No, sir.

20 Q Okay. Some of this is duplicative,  
21 but if I could have you -- if we could mark Tab 9  
22 as Exhibit 4.

1 (Hampton Deposition Exhibit Number 4  
2 marked for identification.)

3 BY MR. BROWN:

4 Q Is that in front of you?

5 A No, sir.

6 Q If you would just let me know when  
7 that comes up, I'd appreciate it.

8 A It's there.

9 Q If you would turn to the third page  
10 of Exhibit 4, which is Tab 9. Do you see that?

11 A I do.

12 Q And these are text messages from  
13 Cathy Latham to you. Is that correct?

14 A That's between Cathy and I, yes.

15 Q Okay. And so -- just so I get this  
16 straight, at the top "okay" is -- is you, right?

17 A The blue is me.

18 Q Okay. I can't tell the colors.

19 But if you would -- I have blackened  
20 my copy of it. I'm not looking at the screen.

21 The "okay" is I take it blue, and  
22 that's yours, correct?

1           A       Correct.

2                   MR. MILLER: Bruce, she's on the  
3 right side of the -- hers are on the right side of  
4 the screen, whoever the other person is is on the  
5 left-hand side.

6                   MR. BROWN: Thank you. I -- I am  
7 colorblind, but I do know my left hand from my  
8 right, so that was very helpful.

9                   MR. MILLER: Sure.

10       BY MR. BROWN:

11           Q       Okay. Now, Ms. Latham says, "How is  
12 it today? Finished?" Do you see that?

13           A       I do.

14           Q       And she's referring to the copying of  
15 the election software, correct?

16                   MR. MILLER: Object to form.

17                   THE WITNESS: I have no idea.

18       BY MR. BROWN:

19           Q       I may have that wrong.

20                   Do you see where she says, "Scott has  
21 landed and the rest of the team is almost to  
22 Douglas"? Do you see that?



1 A I do.

2 Q And then you say, "Okay. Democratic  
3 man is still here." Do you see that?

4 A I do.

5 Q Is there like more than one  
6 democratic man in Coffee County?

7 I mean, it says, "The democratic  
8 man." Who was the Democratic man?

9 A He was the poll watcher, I think is  
10 what he was.

11 Q Okay. Why would he have been there  
12 on January 6th or 7th?

13 A He also was a -- what was he called?

14 Q Is that the -- the vote review panel?

15 A I think he was part of the vote  
16 review panel.

17 Q Is it John Terry? Is that his name?

18 A I do not know.

19 Q Okay.

20 A I remember he had one of those little  
21 beanie hats on.

22 Q Okay. Why was it -- why -- why was

1 it important for you or why did you tell Cathy  
2 Latham that the democratic man is still here?

3 A I don't recall.

4 Q Well, you didn't want the democratic  
5 man being there while SullivanStrickler was there  
6 copying equipment, right?

7 A Again, correct.

8 MR. MILLER: Object to form.

9 BY MR. BROWN:

10 Q Okay. So it had nothing to do with  
11 him coming in and copying the equipment?

12 A No, sir.

13 Q Okay. Okay. Then at 3:48 on the  
14 7th, you tell Latham -- Ms. Latham, "Going great so  
15 far." Do you see that?

16 A I do.

17 Q And was that relating to getting  
18 people provisional ballots or was that relating to  
19 the work that SullivanStrickler was doing?

20 A I don't remember.

21 Q If you drop down, you say, "I'm  
22 inviting you to install Signal." Do you see that?

1           A       I do.

2           Q       And did the three of you, you and  
3 Eric Chaney and Ms. Latham, then communicate via  
4 Signal together?

5           A       Not that I recall.

6           Q       Do you recall in the day -- a couple  
7 of days before the January 7 copying that  
8 Mr. Chaney getting into a disagreement with  
9 Dominion?

10          A       I don't know what you call a  
11 disagreement, what your meaning about a  
12 disagreement.

13          Q       A disagreement.

14                   Did they have words?

15          A       Did he speak with Dominion? Yes.

16          Q       Was there an issue?

17                   Did -- did Mr. Chaney express any  
18 sort of disagreement with Dominion or who -- how  
19 they were working or handling the equipment itself?

20          A       Yes.

21          Q       Okay. And what was the nature of  
22 the -- what was the issue?

1 A The scanner.

2 Q And what did Mr. Chaney say and what  
3 did the Dominion person say?

4 MR. MILLER: Object to form.

5 THE WITNESS: He was speaking with  
6 Gary from Dominion. Gary was in the office. And  
7 two or Dominion techs were there. And the scanner  
8 was kicking back ballots and he asked them -- asked  
9 Gary who did he report to. And he told him Scott  
10 Hall, so he asked him could he get him on the  
11 telephone.

12 And he called -- Mr. Scott -- or  
13 Gary called Mr. Scott, and Eric told him he had  
14 30 minutes to get the scanner fixed or he was  
15 going to call every news station within a  
16 hundred-mile radius and invite them into the  
17 office to show them what piece of crap the  
18 Dominion machine was. And Mr. Gary asked -- I  
19 mean Mr. Scott asked him was that a threat or a  
20 promise.

21 BY MR. BROWN:

22 Q And Mr. Chaney said both?

1           A       He said, "That's a promise." And  
2       Mr. Scott hung up the phone.

3           Q       And then what happened?

4           A       Gary and the two techs -- or Gary and  
5       one of the techs went outside. One of the techs  
6       was escorted by a police officer to a neighboring  
7       county to borrow another scanner.

8           Q       And then what happened?

9           A       Those two techs stayed outside for a  
10       good 20, 30 minutes. Came back inside. Gary told  
11       me that -- to scan the -- that if I would just  
12       trust him one time, the machine would work, just  
13       trust him. And he said, "Give it one more shot,"  
14       and so we did.

15          Q       And did it work then?

16          A       Perfectly.

17          Q       And was that the same scanner that  
18       they fixed or did they bring one in from another  
19       county?

20          A       The same scanner.

21          Q       Do you know or were you told what  
22       Dominion did to make it work?

1           A       No, sir. They never touched the  
2 scanner.

3           Q       Do you know how they fixed it without  
4 touching it?

5           A       No, sir, I do not.

6           Q       Do you have any speculation as to how  
7 they did it?

8                   MR. MILLER: Object to form.

9                   But go ahead and answer.

10                  THE WITNESS: I think it was hacked  
11 into.

12 BY MR. BROWN:

13           Q       Somehow remotely it was -- it was  
14 fixed?

15           A       I think so.

16           Q       Okay. And is -- is that because --  
17 well, I can -- you arrived at that conclusion  
18 because there's no other alternative basically?

19           A       Well, they never touched it, but it  
20 all of a sudden scanned every ballot perfectly,  
21 even a ballot that had food substance all over it.

22           Q       Did Gary -- did you ask Gary how they

1 fixed it?

2 A No, but Gary stood there and kept  
3 saying, "I told you so. I told you so. I told you  
4 so," very cocky.

5 Q Well, he was right to be cocky,  
6 right?

7 A I guess so. But he was standing  
8 there with his phone in his hand propped up against  
9 the door panel and the scanner was probably three  
10 feet from him.

11 Q So do you think he did -- he did  
12 saying by his phone or that he was calling someone  
13 who did it some other way?

14 A I do not know.

15 Q Did that -- so that -- did that fix  
16 the scanner for good or did this other problem  
17 still remain?

18 A I don't know. That was the last  
19 election I used that scanner.

20 Q Right, but two days later, the people  
21 came in for the very purpose of fixing that  
22 scanner, right?

1 MR. MILLER: Object to form.

2 BY MR. BROWN:

3 Q So I'm confused, because what you're  
4 telling me is that Dominion magically fixed the  
5 scanner, and then a couple of days later, Eric --  
6 at Eric's direction the people came in to copy the  
7 entire suite of election software for the purpose  
8 of doing something that was no longer necessary,  
9 and that is to fix the scanner?

10 MR. MILLER: Object to form.

11 THE WITNESS: I don't know that  
12 that's correct.

13 BY MR. BROWN:

14 Q What's wrong with that?

15 A Because I didn't run another election  
16 on it.

17 Q I understand that, but on the --  
18 January 5th, was the disagreement between Eric  
19 Chaney and Dominion, in which he demanded that  
20 Dominion fix the scanner, Dominion, we're not sure  
21 how, fixed the scanner, right?

22 A It scanned every ballot.



1 Q Right.

2 And then two days later, at  
3 Mr. Chaney's direction, you authorized third  
4 parties to come in and copy the entire election  
5 software for the purpose of fixing what Dominion  
6 had just fixed two days before, correct?

7 MR. MILLER: Bruce, I'm sorry,  
8 she's --

9 (Counsel conversing with witness off the  
10 record.)

11 MR. BROWN: Not while my question is  
12 pending, Jonathan.

13 MR. MILLER: I'm sorry?

14 MR. BROWN: Not -- don't whisper to  
15 her while my question is pending.

16 MR. MILLER: I said, "You're going to  
17 have to plead the Fifth to that." I apologize for  
18 whispering that.

19 THE WITNESS: I plead the Fifth.

20 BY MR. BROWN:

21 Q Okay. So you -- you told me about  
22 the scanner being fixed on the 5th, you told me

1 about the purpose of the copying on the 7th, but  
2 you're taking the Fifth as to the relationship  
3 between those two events that you've already  
4 testified to, correct?

5 Okay. I'm going to need a copy of  
6 what you're writing to your lawyer. Can you hand  
7 that to Ms. Marks?

8 And I'm not trying to pry,  
9 Ms. Hampton, but --

10 MR. MILLER: I understand.

11 BY MR. BROWN:

12 Q -- but while my question is pending,  
13 between my question and your answer, please do not  
14 talk to your lawyer.

15 MS. MARKS: Are there other pages?

16 MR. MILLER: No, that's it.

17 MR. BROWN: Thank you.

18 MR. MILLER: May I whisper into  
19 Ms. Marks' ear?

20 Bruce, did you hear that?

21 MR. BROWN: I did, and I'm -- I'm not  
22 in a position -- I don't think I have the right to

1 object or not to that.

2 MR. MILLER: Okay.

3 MS. LAROSS: Can I see the note as  
4 well, Jonathan?

5 MR. MILLER: Sure.

6 I don't have -- I'm -- I'm done,  
7 Bruce. Whenever you want to get back.

8 MR. BROWN: I'll withdraw -- I'll  
9 withdraw the question. But, Jonathan, you may want  
10 to reconsider taking the Fifth as to the last one.

11 MR. MILLER: Well, if Ms. Marks will  
12 send you an e-mail or a text message real quick.

13 BY MR. BROWN:

14 Q Now, Ms. Hampton, you authorized  
15 SullivanStrickler to have access to the election  
16 equipment in Coffee County's Election office,  
17 correct?

18 A I'm sorry?

19 Q You authorized SullivanStrickler on  
20 January 7th to have access to Coffee County's  
21 election software in your Coffee County's election  
22 office, right?

1           A       Under the direction of Eric, yes.

2           Q       And you -- you could see them

3 actually copying the software, correct?

4           A       I don't know that I -- I didn't know  
5 that it was software that they were copying.

6           Q       What did you think they were copying?

7           A       I'm not a computer tech, so I really  
8 did not know.

9           Q       Okay. But you saw them working at  
10 the server, correct?

11          A       Correct.

12          Q       And the ICC scanner computer,  
13 correct?

14          A       Correct.

15          Q       And you saw them with all the  
16 CompactFlash cards and USB drives, you saw them  
17 copying all those, right?

18          A       Correct.

19          Q       Okay. And you saw them copying  
20 the -- the poll pads also, correct?

21          A       I can't recall the poll pads but ...

22          Q       Maybe yes, maybe no, right?

1           A       I can't recall for sure the poll  
2 pads.

3           Q       Okay. At any time did you tell Tony  
4 Rowell that SullivanStrickler or anyone had been  
5 given access to make copies of the election  
6 equipment in Coffee County?

7           A       I did not know.

8           Q       You don't know of anybody informing  
9 him?

10          A       I do not know.

11          Q       Okay.

12                   MR. BROWN: I'm going to -- I'm going  
13 to have -- for everybody's knowledge, I'm going to  
14 go through one other small topic, short topic, and  
15 then we'll take a break for lunch, if that's okay  
16 with everybody.

17 BY MR. BROWN:

18          Q       What I would like to do is ask you  
19 some questions on sort of the events of  
20 January 7th, in and out.

21                   On the day that SullivanStrickler was  
22 there, you opened the door for them, correct?

1 A I think I did one day, yeah.

2 Q And who else was there when the team  
3 of -- the four people from SullivanStrickler came?  
4 Who else was there in your office?

5 A Eric Chaney, Ed Voyles, Jil  
6 Ridlehoover. I think Cathy Latham was. I can't  
7 remember anyone else.

8 Q Do you recall Scott Hall being there?

9 A Yes.

10 Q Do you recall a gentleman with  
11 Mr. Hall named Alex Cruce being there?

12 A I do not.

13 Q Do you remember somebody with him,  
14 somebody with Mr. Hall?

15 A I -- yes.

16 Q Okay. And can you describe him or do  
17 you recall?

18 A I do not recall.

19 Q What was Mr. Voyles doing there?

20 MR. MILLER: Object to form.

21 THE WITNESS: I do not know. I don't  
22 recall.

1 BY MR. BROWN:

2 Q Did you -- but he was there while  
3 they were -- they were copying the election  
4 software, right?

5 A I know he was in the office.

6 Q Do you recall how long he was there?

7 A No, sir, I do not.

8 Q Did he -- did you talk to him about  
9 what the team from SullivanStrickler were doing?

10 A I don't remember if I did or did not.

11 Q At any time did you talk with  
12 Mr. Voyles about the third parties coming in there  
13 and making a copy of the election software?

14 A I don't know if I did or did not, I  
15 can't remember.

16 Q Was Miles Latham there at any time?  
17 Do you recall?

18 A I don't recall to be sure, no, sir.

19 Q Let me back up a second to -- to your  
20 testimony about the discussion between Mr. Chaney  
21 and -- and Dominion, Greg from Dominion. He -- he  
22 asked to speak with the supervisor. And could you

1 tell me again the name of the supervisor?

2 A Gary's supervisor?

3 Q Yes.

4 A Scott Hall -- no, Scott Tucker.

5 Q Right. That's why I wanted to ask  
6 you again.

7 A Okay. Thank you.

8 Q Now you told me that and I'm thinking  
9 wait a minute. That's too much of a consequence.

10 So Scott Tucker is --

11 A Sorry.

12 Q So when you were mentioning "Scott,"  
13 you were talking about Scott Tucker, correct?

14 A Correct. Correct.

15 Q Okay.

16 A Thank you for that.

17 Q That's all right.

18 So getting back to what we were  
19 talking about before, Miles Latham might have been  
20 there, might not have, you can't recall. Is that  
21 right?

22 A I can't recall.



1           Q       Now, to -- Ms. Latham knew before  
2       the -- the SullivanStrickler people came that they  
3       were coming down, right?

4                    You talked to her about it?

5                    MR. MILLER: Object to form.

6                    THE WITNESS: I remember her -- I  
7       don't remember the extent of the conversation.

8       BY MR. BROWN:

9           Q       Okay. But -- but she -- did she just  
10       show up at the election office coincidentally or  
11       did she know this was going on, as far as you know,  
12       as far as you could tell?

13                   MR. MILLER: Object to form.

14                   THE WITNESS: I mean, per the text,  
15       she knew that Scott was going to be there.

16       BY MR. BROWN:

17           Q       Right.

18                    Do you know how she was involved in  
19       the decision to allow -- or do you know whether and  
20       how she was involved in the decision to allow the  
21       third parties to come in and copy the software?

22                    MR. MILLER: Object to form.

1 THE WITNESS: I do not.

2 MR. BROWN: Okay. Why don't we take  
3 a 30-minute break and get a break -- get a bite.  
4 Is that all right with you, Jonathan?

5 MR. MILLER: Yeah, that's fine with  
6 me.

7 MR. BROWN: Okay. So we'll be back  
8 on at about ten till 2:00. Okay?

9 MR. MILLER: Okay. My diabetes will  
10 be happy.

11 MR. BROWN: Thank you, Ms. Hampton.  
12 And we'll see you in a little bit.

13 THE WITNESS: Okay.

14 VIDEOGRAPHER: Okay. We are going  
15 off the record at 1:14.

16 (Recess from 1:14 p.m. to 2:04 p.m.)

17 VIDEOGRAPHER: We are back on the  
18 record at 12:04 p.m.

19 BY MR. BROWN:

20 Q Ms. Hampton, we're back --

21 VIDEOGRAPHER: I'm sorry. We are on  
22 the record at 2:04 p.m.

1 THE WITNESS: I was about to say we  
2 went backwards in time.

3 VIDEOGRAPHER: You can proceed, sir.

4 MR. BROWN: Thank you.

5 BY MR. BROWN:

6 Q Ms. Hampton, have you had your  
7 deposition taken before?

8 A Yes, sir.

9 Q How many times?

10 A Probably less than five.

11 Q Have you had your deposition taken in  
12 connection with elections or your work as an  
13 election director?

14 A I don't think so.

15 Q So the -- you mentioned in response  
16 to one of my questions that you've learned  
17 something in a deposition. What were you referring  
18 to?

19 A The time that we met with Ms. Marks,  
20 but I don't know that that was a -- I mean, it  
21 wasn't recorded or anything so ...

22 Q Okay. But you haven't -- were you --

1 did you testify in front of the grand jury?

2 A Yes.

3 Q Okay. When was that?

4 A Last month.

5 Q Okay. I need to ask this just for  
6 formality, but -- I should have asked it at the  
7 beginning, but are you under any medication that  
8 would prevent you from testifying accurately today?

9 A No, sir.

10 Q Okay. I asked you if you knew that  
11 Sidney Powell was paying for SullivanStrickler's  
12 work, and I believe your response was you did not  
13 know that one way or the other, correct?

14 A That's correct.

15 Q Did you -- did you have any idea of  
16 who was paying for the work?

17 A No, sir.

18 Q Okay. We were talking about the  
19 malfunctioning scanner at Coffee County that was at  
20 issue. Was that the ICC scanner?

21 A I don't remember the technical terms  
22 of them. I'm sorry.

1 Q Is it the -- is it the central  
2 scanner?

3 A It's the scanner that's hooked to the  
4 main computer.

5 Q Okay.

6 A Not the ones that's at the actual  
7 precincts.

8 Q Right.

9 We were discussing Mr. Chaney's  
10 discussion with the Dominion representatives.  
11 Mr. Tucker was on the phone, right?

12 A Correct.

13 Q And were -- were Dominion  
14 representatives present with you all or was it all  
15 on the phone?

16 A The techs were on the phone -- I mean  
17 were present.

18 Q Okay. Was that Gary and James?

19 A Correct.

20 Q And --

21 A And there was another one there, but  
22 I can't -- I want to say his name was Sam or

1 Samuel. I can't remember his last name.

2 Q Okay. And James didn't work for  
3 Dominion very much longer after that, right?

4 A I have no idea.

5 Q Okay. Did you see him again after  
6 that?

7 A No, I did not.

8 Q Okay. You don't know if he was let  
9 go or transferred, one way or the other. Is that  
10 right?

11 A I do not because it was not very long  
12 that I was forced to resign, so I have no idea.

13 Q Okay. I had asked you if you had  
14 called what we now know is Robert Sinners'  
15 telephone number and you said you did not call it.  
16 I should have asked: Did you text that number?

17 A Not that I'm aware of, no, sir, not  
18 to my memory.

19 Q Okay. You testified that three of  
20 the board -- that Mr. Chaney had indicated that  
21 Matt and Ernestine and Mr. Chaney concurred in the  
22 decision to allow the third parties to have access

1 to the election equipment.

2 Do you recall that testimony?

3 A Yes, sir.

4 Q Did Mr. Stone also concur with that  
5 directive?

6 A I do not know.

7 Q Did he disagree with it or take issue  
8 with it in any way?

9 A I do not recall anything with  
10 Mr. Stone.

11 Q One way or the other?

12 A No, sir.

13 Q Okay. Now, you testified that  
14 Ms. Ridlehoover -- am I saying that correctly,  
15 Ridlehoover?

16 A Ridlehoover.

17 Q -- Ridlehoover was in the election  
18 office at least most of the day on the 7th, when  
19 SullivanStrickler had been given access to the  
20 equipment.

21 Do you recall that?

22 A Correct.

1           Q       Okay.  And was her desk facing your  
2       office such that she could see what they were  
3       doing?

4           A       Her desk was facing the office, but  
5       she had two monitors in front of her.

6           Q       Okay.  And did you direct her to keep  
7       quiet about what she saw that day?

8           A       I -- I told her to do her job.

9           Q       Did you tell her to not talk to  
10      anyone about what she was witnessing?

11          A       No, sir.

12          Q       I may have asked this, but I want to  
13      make sure -- it was subject to an objection by  
14      Mr. Miller, and I want to make sure I got it  
15      correctly, but before the third parties, who became  
16      SullivanStrickler, were granted access to the  
17      Coffee County Election System, did anybody -- did  
18      you tell anybody at Dominion, whether it was James  
19      or Gary or anybody else, that the third parties  
20      were going to have access to your equipment and to  
21      your software?

22          A       To the best of my memory, no.



1           Q       To the best of your memory, did you  
2       tell anyone at Dominion after SullivanStrickler had  
3       been given access to your equipment and software  
4       that that had happened?

5           A       To the best of my memory, no.

6           Q       Okay. And you -- you took a while to  
7       answer, and I -- I do appreciate that, but is there  
8       something that you're remembering that you might  
9       have told them or they might have found out that  
10      you're thinking about?

11          A       No, sir, just running through my  
12      brain.

13          Q       Okay. I want to shift a couple of  
14      days to January 17th, it's about ten days after  
15      SullivanStrickler was there. Do you recall being  
16      visited by Mr. Lenberg and Mr. Logan?

17          A       Yes, sir.

18          Q       And what were they doing at the  
19      Coffee County Election's Office?

20                   MR. MILLER: Object to form.

21                   THE WITNESS: I do not recall.

22

1 BY MR. BROWN:

2 Q You just don't remember? You don't  
3 remember Mr. Lenberg being there day after day?

4 A That's not what I said.

5 Q Do you remember why they were there?

6 A No, sir, I do not remember exactly  
7 why they were there.

8 Q Do you remember generally why they  
9 were there?

10 A No, sir.

11 Q Did you give either Mr. Lenberg or  
12 Mr. Logan any authorization to have access to the  
13 equipment?

14 A They were -- I mean, I was there, so  
15 I had given them, you know, authorization, you  
16 know, from direction of Eric.

17 Q Was the -- was your understanding  
18 that the direction from Mr. Chaney extended from  
19 the access that was given on the 7th to additional  
20 access that was given on the 17th and the 18th?

21 A Correct.

22 Q Okay.

1 A Yes.

2 Q And how was that conveyed to you?

3 A How was that conveyed to me, is that  
4 what you asked?

5 Q Yes. How did you know that?

6 A He never said no.

7 Q Well, if somebody just came off the  
8 street, right, that you didn't know and said, you  
9 know, "Can I hang out and sort of poke around your  
10 election equipment," would you allow them to do  
11 that?

12 I mean, I'm trying to move this  
13 along. Okay? I mean, they -- they showed up. How  
14 did you know they were getting there -- they were  
15 coming?

16 What authority did you have to allow  
17 them -- did you do this just on your own?

18 A As I stated before, I did it with  
19 direction from Eric.

20 Q All right. So Mr. Chaney told you,  
21 "There are going to be two more people coming on  
22 January 17th and 18th"?

1 Did he tell you that?

2 A No, sir.

3 Q Okay. How did you know to allow  
4 Mr. Lenberg and Mr. Logan to have access to the  
5 election equipment on the 17th and 18th?

6 A I don't know how to answer that. It  
7 was a continuation, I guess. I mean, I -- that's  
8 an assumption but ...

9 Q Well, who told you that they were  
10 coming?

11 A I don't recall that.

12 Q Was it Sidney Powell?

13 A As I've stated before, I've never  
14 spoken with Sidney Powell.

15 Q Was it Mr. Chaney?

16 A I don't recall.

17 Q Okay. So these two gentlemen showed  
18 up, you don't recall -- you recall having been  
19 given the direction to allow them to have access to  
20 your equipment, you just simply can't remember  
21 specifics. Is that right?

22 A Correct.

1           Q       Okay.  And what do you recall about  
2       what either of them -- well, let's -- let's talk  
3       about Mr. Lenberg first.

4                    What do you recall Mr. Lenberg doing  
5       when he was there?

6           A       Discussing the election equipment.

7           Q       With you?

8           A       Yes, sir.

9           Q       And so he was trying to figure out  
10       how it worked.  Is that right?

11          A       Correct.

12          Q       And you told him, right?

13          A       Yes, sir.

14          Q       You answered his questions, right?

15          A       That's correct.

16          Q       And did he -- did you give him sort  
17       of hands-on access to the equipment or did he ask  
18       you to do things to the equipment and then answer  
19       questions?  If that makes any sense.

20          A       That don't make any sense.

21          Q       Okay.  Did you allow him access to  
22       the equipment, hands-on?

1           A       Did he touch the machines, is that  
2       what you're asking?

3           Q       Well, okay, did he touch the  
4       machines?

5           A       No.

6           Q       Okay. Did he ask not to touch the  
7       machines?

8           A       Not that I recall.

9           Q       Okay. So how did -- how did -- did  
10      he examine the machines -- the machines through  
11      you? Did you do it for him?

12          A       I was the one that was physically  
13      touching the machines, yes.

14          Q       Right. Okay.

15                   And give me an example of what you  
16      can recall about Mr. Lenberg asking you to do on  
17      the machines.

18                   MR. MILLER: Object to form.

19                   THE WITNESS: I don't recall, sir.

20      BY MR. BROWN:

21          Q       But basically he was trying to figure  
22      out how they worked, right? Fair to say?

1           A       I would say so.

2           Q       And did he ask you to make any copies  
3 of any of the equipment or the software or the  
4 thumb drives or anything else in there?

5           A       I'm going to plead the Fifth on that.

6           Q       Okay. And I believe the video shows  
7 that Mr. Lenberg came over a period of days. Is  
8 that consistent with your recollection?

9           A       Yes, sir.

10          Q       Okay. And so he would come and ask  
11 you questions and have you do certain things on the  
12 machines, leave and then come back the next day and  
13 do -- do that some more, right?

14          A       Correct.

15          Q       Okay. And was the purpose of this  
16 again to fix your ICC scanner or was there another  
17 purpose for Mr. Lenberg's visit?

18                   MR. MILLER: Object to form.

19                   THE WITNESS: I can't answer that.

20 BY MR. BROWN:

21          Q       Do you know why he was there, why he  
22 was allowed to be there?

1 MR. MILLER: Object to form.

2 THE WITNESS: No, sir, I do not.

3 BY MR. BROWN:

4 Q Okay. So Mr. Chaney gave you the  
5 instruction, you followed it, but you did not know  
6 what the purpose of it was, correct?

7 A I didn't do anything without the  
8 direction of Eric Chaney.

9 Q Right.

10 At Mr. Chaney's direction, you  
11 allowed Mr. Lenberg to have access to the equipment  
12 and you answered his questions. And you do not  
13 know specifically why that was being done, correct?

14 MR. MILLER: Object to form.

15 THE WITNESS: Correct.

16 BY MR. BROWN:

17 Q Okay. Is it fair to say that it had  
18 to be for some reason other than fixing the ICC  
19 scanner?

20 MR. MILLER: Object to form.

21 THE WITNESS: I don't know how to  
22 answer that question.



1 BY MR. BROWN:

2 Q Did Mr. Lenberg ask you to change the  
3 clock on the system?

4 A I don't recall.

5 Q So he might have or might not have,  
6 you just don't another one way or the other?

7 A I do not recall.

8 Q Well, I don't recall being an NBA  
9 player, but I can also say to a metaphysical  
10 certitude that I was not.

11 What I'm trying to get is, is this a  
12 situation where maybe he did ask you to change the  
13 clock? Maybe he didn't? I don't remember one way  
14 or the other?

15 A I do not --

16 Q Something that you can remember  
17 like -- like talking to President Trump.

18 Do you recall when you said you do  
19 not recall talking to President Trump, so the  
20 correct answer was you know you didn't? That's  
21 what I'm trying to get to here. Okay?

22 Did Mr. Lenberg ask you to change the

1 clock?

2 A I do not recall.

3 Q So he might have, correct?

4 A I do not recall.

5 Q So if he said he did, you would not  
6 deny it, right?

7 A I do not recall.

8 Q I want an answer to my last question.

9 MR. MILLER: Object to form.

10 Go ahead and answer.

11 THE WITNESS: I don't remember if he  
12 told me to or not.

13 BY MR. BROWN:

14 Q So he could have or he could not  
15 have, you just don't know one way or the other,  
16 right?

17 A He could be a millionaire, I don't  
18 know.

19 Q No, it's different, Ms. Hampton.  
20 There are things that you would -- you would  
21 remember. Isn't changing the clock on the computer  
22 something you would remember if he asked you to do?

1 A Mr. Brown, I do not remember.

2 Q Okay. So he might have, right?

3 A I do not remember if he did or did  
4 not.

5 Q Okay.

6 A I'm not going to answer a question  
7 that I do not remember the answer to.

8 Q I'm not asking you if you remember,  
9 I'm -- I mean, there are -- he didn't -- you recall  
10 that he didn't drive his car through the office,  
11 correct?

12 That did not happen, right?

13 A No, he did not drive his car through  
14 the window -- through the office.

15 Q Right.

16 You don't remember that happening,  
17 right?

18 A No, he did not drive his car through  
19 the office.

20 Q Okay. But you cannot say for sure  
21 that he did not ask you to change the clock, right?

22 A Correct, I cannot say for sure.

1 Q Okay. Now, other than Mr. Chaney,  
2 who did you discuss Mr. Logan and Mr. Lenberg's  
3 visit to the Coffee County Election's Office with?

4 A I don't recall.

5 Q Okay. Do you recall referring to the  
6 activities of Mr. Lenberg and Mr. Logan as, quote,  
7 measuring your desk?

8 Do you recall that?

9 A I do.

10 Q And why did you use that code to  
11 describe the work that they were doing?

12 MR. MILLER: Object to form.

13 THE WITNESS: I plead the Fifth on  
14 that.

15 BY MR. BROWN:

16 Q Did you think that there was  
17 something wrong with what they were doing?

18 MR. MILLER: Object to form.

19 THE WITNESS: I plead the Fifth on  
20 that.

21 BY MR. BROWN:

22 Q Did Mr. Voyles know that -- or did

1       you tell Mr. Voyles that Mr. Logan and Mr. Lenberg  
2       were there, that they had been there or that they  
3       were going to be there?

4               A       I don't recall.

5               Q       Did they get what they came for?

6                       MR. MILLER:  Objection.

7                       THE WITNESS:  I don't know.  It  
8       wasn't long after that that I was forced to resign,  
9       so I have no idea.

10       BY MR. BROWN:

11               Q       Well, was there any -- was there any  
12       connection between you letting them in and you  
13       getting terminated?

14                       MR. MILLER:  Object to form.

15       BY MR. BROWN:

16               Q       There was, wasn't there?

17               A       I'm sorry, you cut out on that.

18               Q       Was there any connection between you  
19       allowing either SullivanStrickler to have access  
20       and Mr. Logan and Mr. Lenberg to have access and  
21       the fact that you were terminated?  Do you know?

22                       MS. LAROSS:  Objection as to form.

1 THE WITNESS: I do not know.

2 BY MR. BROWN:

3 Q Let me direct your attention to what  
4 is going to be marked as Exhibit 5, which is Tab  
5 25.

6 (Hampton Deposition Exhibit Number 5  
7 marked for identification.)

8 BY MR. BROWN:

9 Q And before I do that, let me ask some  
10 of the same questions about -- about -- about  
11 Mr. Logan. This is going to be repetitive, but the  
12 questions I had asked you before was about  
13 Mr. Lenberg.

14 You recall Mr. Logan being in your  
15 offices. Is that right?

16 A Yes.

17 Q And you do not know the purpose of  
18 his visit, correct?

19 A Correct.

20 Q And you don't recall whether he asked  
21 you one way or the other to change the clock,  
22 correct?

1 A Correct.

2 Q And he did not touch -- actually  
3 touch the equipment, correct?

4 A Correct.

5 Q Instead he asked questions and you  
6 answered them. Is that right?

7 A Correct.

8 Q And in some instances he asked you to  
9 do things on the computer. Is that right?

10 And you would do that according to  
11 his instructions. Is that right?

12 A Correct.

13 Q And as far as you know, did he make  
14 any copies of anything that he saw there or -- or  
15 worked on there?

16 A I don't recall.

17 Q And you don't know -- okay. That's  
18 good.

19 And before he got there -- or while  
20 he was there, did you know that he was associated  
21 with the group Cyber Ninjas?

22 A No, sir.

1           Q       Okay. Now, let me direct your  
2 attention to Tab 5, which is Tab 25. I'll  
3 represent to you that Exhibit 5 was produced to us  
4 by Doug Logan. And you don't have to believe this,  
5 but I'll tell you that Mr. Logan says that this is  
6 a compilation of Signal texts that he recovered  
7 that relate to you or to Coffee County.

8                   And so you used Signal to communicate  
9 with people, right?

10           A       Did I use Signal to communicate with  
11 people?

12           Q       Yes.

13           A       Yes.

14           Q       Okay. And you communicated with  
15 Mr. Logan over Signal, correct?

16                   I will get to it. If you look at the  
17 first page of Exhibit 5. Do you see Mr. Lenberg  
18 sent a text -- I'm not sure if it's to you, I don't  
19 know that it is, but it's right in the middle.  
20 It's on the 17th at 15:09. He says, "I'm -- I am  
21 now in Coffee County. It turns out that Misty is  
22 tied up with her family through much of Monday.



1 She will be able to help on Tuesday."

2 Do you see that?

3 A I do.

4 Q Do you recall communicating with  
5 Mr. Lenberg prior to their visit concerning your  
6 own work schedule?

7 A I don't recall it, but I guess -- I  
8 mean, the screen says so.

9 Q It looks like you did, yeah. Okay.  
10 And then do you see the -- the  
11 messages at the bottom of the first page of Exhibit  
12 5? Do you see Jim Penrose has a text, I think it's  
13 to you, but I'm not positive. And it says, "Quick  
14 question, how do you get your vote totals from  
15 Coffee County to Georgia Secretary of State? How  
16 do you report them up?"

17 Do you see that?

18 A I do.

19 Q And then it looks like your response  
20 is, "I report it thru Election Night Reporting."  
21 Do you see that?

22 A I do.

1 Q So it appears that you were in  
2 communication through -- through Signal with --  
3 with Mr. Penrose. Is that right?

4 A I guess so.

5 Q And when I asked you earlier if you  
6 remembered him, you said the name was familiar, but  
7 you couldn't quite place it. Is that right?

8 A Correct.

9 Q And then if you go down, Mr. Logan  
10 says, "Is that a website? If so, do you have the  
11 URL?" Do you see that?

12 A I do.

13 Q And I think Mr. Penrose answers that  
14 on the next page. Do you see that?

15 A No, sir.

16 Q Well, can you turn the page.

17 MS. MARKS: It's coming.

18 MR. MILLER: It's not quite there  
19 yet, Bruce.

20 MR. BROWN: It's all good. Thank  
21 you.

22 MS. MARKS: Let me try and refreshen

1 this.

2 BY MR. BROWN:

3 Q Are you with me?

4 A I am.

5 Q Okay. Good.

6 Now, it looks like there's a number  
7 of different Signal texts between you and  
8 Mr. Penrose and Mr. Logan about how you get the  
9 results uploaded, correct?

10 A Correct.

11 Q And then if you go down to about the  
12 middle of the page, your message, you say, "I  
13 download on a thumb drive from the EMS computer,  
14 and then take the thumb drive to my desk computer  
15 and put it on the Scytl site. And then I assume  
16 that sends it straight to the State."

17 Do you see that?

18 A I do.

19 Q And how do you -- what -- is it --  
20 how do you pronounce the site?

21 A Scytl.

22 MR. BROWN: And it's -- for the

1 record, it's capital S-C-Y-T-L.

2 BY MR. BROWN:

3 Q And so you -- do you repeat that  
4 multiple times on election night, go from the EMS  
5 to the other computer to upload it?

6 How do you -- how do you physically  
7 do that?

8 A Correct, you -- you take a thumb  
9 drive from the EMS and it downloads to the -- you  
10 have the thumb drive into the EMS and it downloads  
11 to the thumb drive, then you take the thumb drive  
12 and take it to the Scytl site.

13 Q And do you have to do that multiple  
14 times?

15 A Used to they asked for at least three  
16 uploads.

17 Q Okay. So three duplicate uploads,  
18 just for -- for security or for confirmation or for  
19 what?

20 A Three different uploads, so yeah.

21 Q So you'd break the whole load down  
22 into three different uploads, right?

1           A       Used to it would be like after  
2       advancing voting totals, and then after you got a  
3       few precincts in, totals, and then -- then at -- at  
4       least three through the night.

5           Q       Okay. Thank you.

6                   And did you gain an understanding of  
7       why Mr. Penrose was asking you about this process?

8                   MR. MILLER: Object to form.

9                   THE WITNESS: To understand the  
10       process of how it got to the State site.

11       BY MR. BROWN:

12           Q       And did you have any concern about  
13       giving this kind of information to a third party  
14       like this?

15           A       No, sir.

16           Q       Okay. Okay. I'll pull down a little  
17       bit.

18                   Just -- did you keep in touch with  
19       Mr. Penrose after Mr. Logan and Mr. Lenberg left?

20           A       Not that I'm aware of, no, sir. I  
21       don't recall.

22           Q       Okay. These pages aren't numbered,

1 so bear with me for a second.

2 If you would scroll down to -- it's  
3 about the fifth page and the first -- the top row  
4 is from Greg Freemyer to Doug Logan, and it's  
5 February 27th. Can you go to that page? I think  
6 it's the fifth page of this Exhibit 5.

7 A What's the time on the first line?

8 Q 13:31.

9 A Okay. I think she's there.

10 Q Great. Thank you.

11 Now, on that page if you -- well,  
12 first let's just ask, do you know Greg Freemyer?

13 A Not to my knowledge, no, sir.

14 Q I will represent to you that Greg  
15 Freemyer is from SullivanStrickler. And I want to  
16 ask you a question about the row that's about in  
17 the middle of the page, the big fat row. It says,  
18 "Doug, we just got a call from Spalding County,  
19 Georgia to do a preservation of their equipment."

20 Do you see that?

21 A I do.

22 Q Do you hear -- ever hear about

1 Spalding County having their election equipment  
2 preserved?

3 MR. MILLER: Object to form.

4 THE WITNESS: I don't know anything  
5 about that.

6 BY MR. BROWN:

7 Q Okay.

8 MR. MILLER: I'm sorry, Bruce, who  
9 did you represent Greg Freemyer as being with?

10 MR. BROWN: SullivanStrickler.

11 Is that correct? Are you -- is  
12 that wrong?

13 MR. MILLER: I don't have a clue.  
14 That's the first time I've ever heard his name.

15 MR. BROWN: Okay.

16 BY MR. BROWN:

17 Q Do you know a person named Conan  
18 Hayes?

19 A No, sir.

20 Q How about Todd Sanders?

21 A Excuse me?

22 Q Todd Sanders.

1 A No, sir.

2 Q If you would come down about five  
3 more pages at least where the top row is  
4 January 14th, 2021.

5 A What's the time on it?

6 Q 22:53.

7 A What's the time on it again?

8 Q 22:53 -- I'm sorry, 22:56.

9 A Okay.

10 Q Sorry about that my bad. Are you  
11 with me?

12 A I am.

13 Q Okay. The first row Mr. Penrose, on  
14 the 14th says, "Can you run a cast vote report --  
15 cast vote report in JSON format from the EMS for  
16 Coffee County?"

17 Do you see that?

18 A I do.

19 Q Do you recall any communications or  
20 discussion about making a cast vote report in JSON  
21 format from the EMS from Coffee County at any time?

22 A I've never heard of JSON. I don't



1 even know what that is.

2 Q Do you recall anybody ever putting up  
3 the cast vote record from Coffee County on the  
4 internet?

5 A I don't recall that, no, sir.

6 Q Okay. And, again, do you know  
7 Charles Bundren?

8 A No, sir.

9 Q Okay.

10 A Where is that name?

11 Q Let me drop down to -- so about  
12 two-thirds of the way down on the same page, and  
13 it's a message from Phil Waldron. Do you see that?

14 A I do.

15 Q It's dated September 22nd, 2021. Do  
16 you see that?

17 A I do.

18 Q It says, "Misty from Coffee County is  
19 getting hammered like Tina in Mesa County. Do you  
20 have a copy of the image? We need to get to our  
21 lawyer - Bundren - ASAP for her defense."

22 Do you see that?

1 A I do.

2 Q What is he talking about?

3 A I have no idea.

4 Q He refers to you as "getting hammered  
5 like Tina in Mesa County." Do you have any idea  
6 what he's talking about?

7 A No, sir.

8 Q What was going on with you, if  
9 anything, relating to anything of this in September  
10 of 2021?

11 A I have no idea.

12 Q Let me direct your attention to the  
13 next page, which is -- in the first row of the next  
14 page is January 2021, 13:18 text from Jim Penrose.

15 Do you see that?

16 A I do.

17 Q In this Mr. Penrose says to  
18 Mr. Logan, "If you can draft a report for review on  
19 Friday morning with Charles Bundren, that would be  
20 best. We only have until Saturday to decide if  
21 we're going to use this report to try to decertify  
22 the senate runoff election or if we hold it for a

1 bigger movement later."

2 Do you see that?

3 A I do.

4 Q Were you aware of any efforts to  
5 decertify the senate runoff election?

6 MR. MILLER: Object to form.

7 THE WITNESS: No, sir.

8 BY MR. BROWN:

9 Q Was the visit by Logan and Lenberg to  
10 your offices on 17th -- on January 17th and 18th  
11 related in any way to any effort to decertify the  
12 senate runoff election?

13 MR. MILLER: Object to form.

14 THE WITNESS: I have no idea.

15 BY MR. BROWN:

16 Q Do you -- do you have any idea what  
17 Mr. Penrose is referring to as the, quote, bigger  
18 movement later?

19 MR. MILLER: Object to form.

20 THE WITNESS: No, sir.

21 BY MR. BROWN:

22 Q Did you -- after they -- well, if we

1 go halfway down, you'll see the thread name is  
2 "Special Report," which is the far left-hand  
3 column.

4 Do you see that?

5 A Yes, sir.

6 Q Do you know what that was?

7 A No, sir.

8 Q Were you aware of some sort of  
9 special project that Logan and Lenberg was working  
10 on that was associated with a special report?

11 MR. MILLER: Object to form.

12 THE WITNESS: No, sir.

13 BY MR. BROWN:

14 Q In this text, which is at  
15 January 2021 at 18:11, Mr. Lenberg says, "Misty can  
16 do some before we go back. I will not -- I will  
17 work with her on that."

18 Do you know what Mr. Lenberg is  
19 referring to?

20 A No, sir.

21 Q Were you working with Lenberg on his  
22 special report?

1           A       I don't know what the special report  
2     is.

3           Q       You don't know what he was doing with  
4     the information that you were giving him, right?

5           A       Correct.

6           Q       If you drop down to the 22nd,  
7     Mr. Lenberg says at 14:11, "Hey guys. Whenever Jim  
8     is available, we three should get up to date.  
9     Status here in Coffee County has changed quite a  
10    bit and I am having to shift plans."

11                   Do you see that?

12          A       I do.

13          Q       Do you know what on or about  
14    January 27th would have changed the status --

15                   MR. MILLER: Object to form.

16    BY MR. BROWN:

17          Q       -- in Coffee County?

18          A       No, sir.

19          Q       Let me direct your attention to the  
20    circumstances around your termination from Coffee  
21    County. And the -- the stated reason for your  
22    termination was that you had falsified time

1 records, right?

2 A Correct.

3 Q And it's your belief that that is not  
4 the real reason you were fired, correct?

5 A Well, I was forced to resign so ...

6 Q I'm sorry, I -- I knew that. Let me  
7 ask it again.

8 That the falsification of your time  
9 sheets was not the reason you were forced to  
10 resign, correct?

11 MS. LAROSS: Objection to form.

12 MR. MILLER: Ditto.

13 THE WITNESS: Correct.

14 BY MR. BROWN:

15 Q What do you believe was the reason  
16 that you were forced to resign?

17 MR. MILLER: Object to form.

18 THE WITNESS: I believe that I was  
19 forced to resign because -- I'm trying to think of  
20 how to put it without being very hateful. I think  
21 I was forced to resign, one, because of the video  
22 that was created, and the State and Dominion was

1 coming down on Coffee County. It's just my belief.

2 BY MR. BROWN:

3 Q Is it -- why was Dominion coming down  
4 on Coffee County?

5 MR. MILLER: Object to form.

6 BY MR. BROWN:

7 Q Well, let me -- let me correct it.

8 MR. BROWN: Jonathan, you're correct.

9 BY MR. BROWN:

10 Q So let me -- let me try to summarize  
11 what you're saying, because I think I get it.

12 On the video you were critical of  
13 Dominion's equipment, correct?

14 A Correct.

15 Q And you believe that at least one of  
16 the reasons for being forced to resign was not  
17 falsifying time sheets, but was the fact that you  
18 had been critical of Dominion and, by extension,  
19 the Secretary of State, correct?

20 MS. LAROSS: Objection as to form.

21 THE WITNESS: Correct.

22

1 BY MR. BROWN:

2 Q I'm not suggesting that you need any  
3 more evidence, but do you have any evidence other  
4 than simply sort of the chronology of events that  
5 would lead you to that conclusion?

6 A The chairman of my Board -- of the  
7 Board, excuse me, signed off on every time sheet  
8 that was turned in and I was a salary employee.

9 Q So that was obviously bogus, right?

10 MS. LAROSS: Objection as to form.

11 BY MR. BROWN:

12 Q I mean, what you're saying is it --  
13 since you were a salary employee and since your  
14 time sheets are signed off, it's highly unlikely  
15 that that was the reason that you were terminated.  
16 Fair to say?

17 MS. LAROSS: Objection as to form.

18 MR. MILLER: You can answer.

19 THE WITNESS: I think so.

20 BY MR. BROWN:

21 Q Okay. Did anybody suggest to you, in  
22 any kind of communication, that the reason -- the



1 real reason that you were being asked to resign was  
2 because you were critical of Dominion's system?

3 A Yes.

4 Q Who?

5 A A lot of people in the public that  
6 saw the video.

7 Q Anybody associated with Coffee  
8 County, Coffee County Board, Board of Elections?

9 A No, sir.

10 Q I'm not suggesting -- I'm not  
11 suggesting that -- that you needed to support your  
12 belief, because you've already answered why you  
13 believe it, but I just need to get all the facts  
14 down.

15 Like did Mr. Chaney ever suggest that  
16 that's why you were asked to resign?

17 A No, sir.

18 Q Or Ernestine?

19 A No, sir.

20 Q Okay. And do you recall being  
21 terminated right around January -- or, I'm sorry,  
22 February 25th? Does that sound right?

1 A Yes, sir.

2 Q Okay. Let me direct your attention  
3 to Exhibit 6, which is going to be Tab 1.

4 (Hampton Deposition Exhibit Number 6  
5 marked for identification.)

6 BY MR. BROWN:

7 Q Tab 1 is going to be Exhibit 6.

8 A It's up.

9 Q Okay. Let me direct your attention  
10 to page 2. And during the month on the 24th,  
11 you -- you mentioned that you were being asked to  
12 speak to the Rotary Group on the 24th. Do you see  
13 that?

14 A I do.

15 Q And then was there a board meeting  
16 that day or the next day? Do you recall?

17 A I found out later that night that  
18 there was, yes.

19 Q Okay. And so the Board met without  
20 you. Is that right?

21 A Excuse me?

22 Q Did the Board meet without you?

1 A Yes.

2 Q Is that what happened?

3 A Yes.

4 Q Okay. And is it your belief that in  
5 that board meeting they decided to ask for your  
6 termination. Is that right? Ask for your  
7 resignation?

8 MR. MILLER: Object to form.

9 MS. LAROSS: Objection as to form.

10 THE WITNESS: Yes.

11 BY MR. BROWN:

12 Q Okay. And that in that meeting they  
13 also discussed pending or threatened lawsuits. Do  
14 you -- do you know anything about that?

15 MR. MILLER: Object to form.

16 THE WITNESS: Yes.

17 BY MR. BROWN:

18 Q And what were those pending or  
19 threatened lawsuits?

20 A They did not tell me.

21 Q Did it -- did those lawsuits have  
22 anything to do with your -- their decision to ask

1       you to resign?

2                       MR. MILLER: Object to form.

3                       THE WITNESS: I think so.

4       BY MR. BROWN:

5               Q       In what way?

6               A       That they didn't -- they didn't want  
7       to stand behind me.

8               Q       And was there a lawsuit with respect  
9       to which they needed to stand behind you?

10              A       I don't know what lawsuits were ...

11              Q       Was somebody threatening to -- to --  
12       were any of the threats of litigation related to  
13       you though or your work?

14              A       I don't know.

15              Q       Had Dominion threatened to -- to file  
16       a claim or a suit relating to Coffee County?

17              A       I don't know.

18              Q       What made you say that the lawsuits  
19       might be -- might have been related to your -- to  
20       them deciding to ask you to resign?

21              A       Because of the texts that's on this  
22       screen that was done on February the 24th at

1 9:00-something at night.

2 Q So there was some -- some  
3 connection -- you didn't know what the lawsuits  
4 were about, but your -- your belief is that there  
5 was some connection between the lawsuits, or the  
6 threatened lawsuits, and you and your work, right,  
7 something to do with you?

8 A Correct.

9 Q But you don't know what the lawsuits  
10 were about or who -- or the threatened lawsuits  
11 were about or who was threatening to sue, correct?

12 A Correct.

13 Q Did you ever talk with Ernestine  
14 Thomas-Clark about the lawsuits?

15 A After February 25th, I have not  
16 spoken to Ernestine or Eric.

17 Q Okay. I'd like to make Tab 18  
18 Exhibit 7.

19 (Hampton Deposition Exhibit Number 7  
20 marked for identification.)

21 BY MR. BROWN:

22 Q Do you see that?

1 A I do.

2 Q And you made an Open Records Act  
3 request to get the -- the videos that would show  
4 the comings and goings at the -- at the elections  
5 office, correct?

6 A Correct.

7 Q Do you know if that video that you  
8 received was edited in any way before you got it?

9 A I never picked it up.

10 Q Okay. And you didn't pick it up  
11 because by the time it was ready, sort of you were  
12 just over it. Is that the idea?

13 A It was a good bit after the open  
14 records request before I was notified that it was  
15 ready.

16 Q Okay. And by then you were no  
17 longer -- you were no longer needed, right?

18 A I was hurt pretty bad by the Board,  
19 so I really tried to let it go.

20 Q I understand.

21 All right. Let me mark as Exhibit 8  
22 Tab 20.

1 (Hampton Deposition Exhibit Number 8  
2 marked for identification.)

3 BY MR. BROWN:

4 Q Are you with me? My notebook fell  
5 apart. Sorry.

6 A It's not up yet.

7 Q Three-hole punch.

8 A Okay. It's up.

9 Q Is this a sample of what they showed  
10 you to purportedly justify why you needed to  
11 resign?

12 A I've never seen this.

13 Q Okay. But did they show you  
14 something like this?

15 A No, sir.

16 Q Did you need any kind of tally or any  
17 kind of proof of your -- of your hours from them?

18 A No, sir.

19 Q Do you know who administratively  
20 would -- would have been responsible for figuring  
21 out if you were not telling everything correctly on  
22 your time sheets?

1 MR. MILLER: Object to form.

2 THE WITNESS: No, sir. I don't know  
3 directly.

4 BY MR. BROWN:

5 Q Probably somebody in the county  
6 manager's office?

7 A That's who we got paid by was the  
8 county manager's office.

9 Q But you don't know who collected the  
10 information relating to your time sheets or Jil's  
11 time sheets?

12 A No, sir.

13 Q Okay. Let me mark as Exhibit 9, Tab  
14 22.

15 (Hampton Deposition Exhibit Number 9  
16 marked for identification.)

17 BY MR. BROWN:

18 Q And I'm not sure if you can, but I  
19 can't on my black-and-white copy, but can you see  
20 the date of this document?

21 A It's not up yet.

22 Q Oh, sorry.



1           A        It's still not up.

2           Q        It's not even that important, but I'm  
3       stubborn, so since I mentioned it, I don't want to  
4       back down. Is it up yet?

5           A        No.

6           Q        Okay.

7                    MS. LAROSS: Can we ask how long  
8       we've been on the record while we're waiting?

9                    VIDEOGRAPHER: You can ask. You want  
10       the actual minutes of record time?

11                   MS. LAROSS: Yes, just --

12                   MR. MILLER: There it is now.

13                   THE WITNESS: There it is. Oops,  
14       never mind, it's still -- it's there.

15       BY MR. BROWN:

16           Q        Okay. Thank you.

17                    And please turn to the least  
18       significant exhibit in the history of earth. I  
19       just need to ask you about it. And this -- you're  
20       looking at, I think, it's Tab 9 -- I mean, I'm  
21       sorry, Exhibit 9, Tab 22, correct?

22           A        It says Tab 21 on the top of the

1 screen.

2 Q Oh, no wonder it took so long.

3 MR. MILLER: Does it have a picture  
4 of a cake with, "Happy Birthday Misty" on it?

5 MR. BROWN: That's okay. We can look  
6 at that one.

7 BY MR. BROWN:

8 Q All right. Tab 21, Exhibit 10,  
9 correct?

10 MS. MARKS: This is 9.

11 THE WITNESS: It says Exhibit 9, Tab  
12 21.

13 BY MR. BROWN:

14 Q Okay.

15 A Is that right?

16 Q It is now.

17 Okay. Tab 21, with the cake is  
18 Exhibit 9. And these are text messages between you  
19 and James. Is that correct?

20 A Yes.

21 Q Okay. Just one second.

22 If you would refer to page 16 of

1 Exhibit 9.

2 A Yeah, it makes me sick. I can't  
3 watch it. Okay, page 16?

4 Q Yes, ma'am.

5 A Okay.

6 Q Right in the middle on December 11,  
7 2020, you say to James, "Want to know something  
8 funny??? These guys in here can not get it to go  
9 from scanner to RTR! And they are the big wigs."

10 What was the occasion for that  
11 remark?

12 A That's when the State came to  
13 investigate and brought the two Dominion guys with  
14 them.

15 Q And those are the -- those are the  
16 bigwigs?

17 A Correct.

18 Q And what is -- for the record, what  
19 is the "RTR"?

20 A It's on the main computer. I don't  
21 remember the actual -- what it means.

22 Q Okay.

1           A        It's the computer -- I mean, the  
2 scanner connects to the computer, so ...

3           Q        Okay. And do you recall why you  
4 needed the password or didn't have it?

5           A        Remember the password? That's when  
6 Scott Tucker was trying to reboot it to see if he  
7 could get it to communicate correctly.

8           Q        Okay.

9           A        Scott Tucker did.

10          Q        Okay. If you go down to page 18.  
11 And if you can just tell me when you're there.

12          A        We're here.

13          Q        The -- this is dated December 31st,  
14 2020. This would be after the recount and the  
15 certification, correct?

16          A        Correct.

17          Q        And what -- if you look way down, you  
18 see -- you say, "This Samuel guy just called me the  
19 tech that will be here. He is from Denver flying  
20 in Monday."

21                    Do you see that?

22          A        I do.

1 Q And then you say, "Yes, he said he  
2 will be here for additional help." Do you see  
3 that?

4 A Can you scroll up, please? Yes.

5 Q And he was -- he was the one that  
6 said it needs cleaning often. Is that right?

7 A Yes.

8 Q And you had heard that before, right,  
9 that the reason why the scanner wasn't working was  
10 that it needs to be cleaned for every hundred  
11 ballots or something? Is that right?

12 A Something like that, some odd number.

13 Q And your -- in your view was that was  
14 not correct, right?

15 A Correct.

16 Q Okay. James says, "There's something  
17 that I don't know which they did not or are not  
18 telling me." Do you see that?

19 A I do.

20 Q Did you ever learn what he didn't  
21 know that they weren't telling him?

22 A Why they were sending this Samuel

1       guy.

2                   Q       I mean, was there something about the  
3       equipment or something that Dominion wasn't  
4       disclosing, or what was it?

5                   A       He and I were talking about why they  
6       were sending Samuel.

7                   Q       It seemed to be a mystery?

8                   A       Correct.

9                   Q       Okay. And then did Samuel show up?

10                  A       Yes, sir.

11                  Q       And then this would have been, I  
12       guess, early January, right?

13                  A       I think so.

14                  Q       So that -- he would have been -- this  
15       would have been in advance of the meeting with Eric  
16       that we talked about before when Eric had words  
17       with the Dominion people. Is that right?

18                  A       I think Samuel came that morning.

19                  Q       Okay. So it was Samuel, Gary and  
20       James and Scott Tucker, right, were the Dominion  
21       people that Eric was talking to, either in person  
22       or over the phone?

1           A       Correct.

2           Q       Okay.

3                   MR. BROWN:  Let's take a -- I need  
4   to -- I need to rearrange my notes because my  
5   notebook fell apart.

6                   MR. MILLER:  Thank God.

7                   MR. BROWN:  Sorry about that.  But,  
8   Jonathan, if you -- if you give me a little break  
9   here, I'll actually be able to move faster so ...

10                  MR. MILLER:  Oh, I want the break.

11                  MR. BROWN:  Okay.  Oh, I thought you  
12   were complaining again.

13                  MR. MILLER:  No, huh-uh.

14                  MR. BROWN:  We'll take --

15                  VIDEOGRAPHER:  We are going off the  
16   record at 3:17.

17                           (Recess from 3:17 p.m. to 3:33 p.m.)

18                  VIDEOGRAPHER:  We are on the record  
19   at 3:33.

20   BY MR. BROWN:

21           Q       I want to mark as the next exhibit,  
22   which is Exhibit 10, I believe, Tab 6.

1 (Hampton Deposition Exhibit Number 10  
2 marked for identification.)

3 MS. LAROSS: It looks like Exhibit 10  
4 is Tab 22.

5 MR. BROWN: Okay. Fair enough.  
6 Exhibit 10 is Tab 22, Exhibit 11 is Tab 6, correct?

7 MS. LAROSS: Correct.

8 MR. BROWN: Thank you.

9 (Hampton Deposition Exhibit Number 11  
10 marked for identification.)

11 THE WITNESS: Which one are you  
12 asking for?

13 BY MR. BROWN:

14 Q Tab 6.

15 A It's up.

16 Q Ms. Hampton, why did Mike Lindell,  
17 also known as My Pillow guy, come to Douglas,  
18 Georgia on February 21, 2021?

19 MR. MILLER: Object to form.

20 THE WITNESS: I plead the Fifth on  
21 that.

22



1 BY MR. BROWN:

2 Q Did you speak with Mr. Lindell or  
3 someone who represented him prior to his visit to  
4 Douglas?

5 A I plead the Fifth on that.

6 Q Did you give to Mr. Lindell anything  
7 that you had taken from the Coffee County Election  
8 Office?

9 A I plead the Fifth on that.

10 Q Who else besides you had keys to  
11 the -- well, let me back up a bit.

12 Mr. Lindell's plane, according to Tab  
13 6, was in Douglas on the 25th and the 26th. Do you  
14 see that?

15 Well, let me just ask you this: Did  
16 you know that he was in Douglas on or about the day  
17 that you were terminated?

18 A I plead the Fifth.

19 Q Have you ever spoken with any -- with  
20 Mr. Lindell or any representatives of Mr. Lindell?

21 A I plead the Fifth.

22 Q Has Mr. Lindell paid you any money?

1 A No, sir.

2 Q Have you received compensation  
3 directly or indirectly from Mike Lindell, anyone  
4 associated with Mike Lindell?

5 A No, sir.

6 Q Did Mr. Lindell ever come to the  
7 Coffee County Election Office, to your knowledge?

8 A Not that I'm aware of.

9 Q Was Mr. Lindell's visit to Douglas  
10 related in any way to the work that  
11 SullivanStrickler, Mr. Logan or Mr. Lenberg did  
12 with respect to Coffee County's election system?

13 MR. MILLER: Object to form.

14 THE WITNESS: I plead the Fifth on  
15 that one.

16 BY MR. BROWN:

17 Q Had you -- have you met Mr. Lindell  
18 in person?

19 A I plead the Fifth on that.

20 Q Besides you, who else in Coffee  
21 County knew that Mr. Lindell was in Douglas in  
22 February of 2021?

1 MR. MILLER: Object to form.

2 THE WITNESS: I have no idea.

3 BY MR. BROWN:

4 Q Did he come to meet with Mr. Chaney?

5 And by "he," I mean Mr. Lindell.

6 MR. MILLER: Object to form.

7 THE WITNESS: I have no idea.

8 BY MR. BROWN:

9 Q Had you ever been on Mr. Lindell's  
10 airplane?

11 A No, sir.

12 Q Did you meet with a man named Ben  
13 Cotton and Stephanie Lambert in Michigan?

14 MR. MILLER: I'm going to object to  
15 that being beyond the scope of your need to know on  
16 that. Stephanie Lambert is an attorney and  
17 anything that she did with Stephanie Lambert would  
18 be privileged and she cannot answer those  
19 questions.

20 MR. BROWN: Okay. Privilege doesn't  
21 extend to everything you do with your attorney, so  
22 I'll ask it again.

1 BY MR. BROWN:

2 Q Did you meet with Stephanie Lambert  
3 and Ben Cotton in Michigan or thereabouts ever?

4 MR. MILLER: I'm going to have her  
5 plead the Fifth.

6 THE WITNESS: I plead the Fifth.

7 BY MR. BROWN:

8 Q Did you know that Ben Cotton was  
9 being paid to do his work by Mr. Lindell?

10 A I plead the Fifth.

11 Q Did you know that Stephanie Lambert  
12 was being paid by Mr. Lindell to represent you?

13 A I plead the Fifth.

14 Q Did you pay Ms. Lambert to represent  
15 you?

16 A I plead the Fifth.

17 Q Did you engage Ms. Lambert -- well,  
18 let me back up a second.

19 Was Mr. Cotton engaged by Ms. Lambert  
20 to serve as your expert witness in any pending or  
21 threatened litigation?

22 MR. MILLER: Object to form.

1 THE WITNESS: I plead the Fifth.

2 BY MR. BROWN:

3 Q Did you know that Mr. Cotton obtained  
4 a copy of what SullivanStrickler copied from Coffee  
5 County?

6 MR. MILLER: Object to form.

7 THE WITNESS: No, I did not.

8 BY MR. BROWN:

9 Q Did you ever have a whistleblower  
10 lawsuit that you were thinking about filing against  
11 anybody?

12 MR. MILLER: She's going to plead the  
13 Fifth.

14 THE WITNESS: I plead the Fifth.

15 BY MR. BROWN:

16 Q Was Mr. Lindell's visit to Coffee  
17 County related to your whistleblower lawsuit?

18 A I plead the Fifth.

19 Q Did you speak with Mr. Lindell about  
20 getting a job with the Trump organization?

21 A With who, please?

22 Q With the Trump organization or the

1 Trump campaign or with the then-former President  
2 Trump?

3 A No, sir.

4 Q Did you ever speak with anyone about  
5 getting a job with the Trump organization, the  
6 Trump campaign or with Mr. Trump?

7 A No, sir.

8 Q Did you ever tell anybody that you  
9 had been offered a job with the Trump organization  
10 or the Trump campaign or Mr. Trump?

11 A I plead the Fifth.

12 Q Let me turn back to the visit by  
13 Mr. Logan and Mr. Lenberg to Coffee County. Some  
14 of the video records suggests that Mr. Lenberg  
15 visited the Coffee County Election Office on every  
16 day between the 25th and the 29th of January 2021.  
17 Is that consistent with your recollection?

18 A I don't remember the dates.

19 Q But it was several consecutive days,  
20 correct?

21 A To the best of my knowledge, I don't  
22 remember exactly.

1 Q And do you recall Inspector, I think  
2 it's, Blanchard also coming when Mr. Lenberg was  
3 there doing his work at your election's office?

4 A I don't recall that.

5 Q So you were -- do you remember that  
6 inspector coming to Coffee County?

7 A He came on multiple occasions.

8 Q Okay. And do you know one way or the  
9 other whether Mr. Lenberg's reference to things  
10 having changed in Coffee County that we saw before  
11 was related to the Investigator Blanchard arriving  
12 in Coffee County right during Mr. Lenberg's visit?

13 MR. MILLER: Object to form.

14 MS. LAROSS: Object as to form.

15 THE WITNESS: I -- I don't have a  
16 clue.

17 BY MR. BROWN:

18 Q Did Mr. Lenberg tell you or did you  
19 understand that Mr. Lenberg was for some reason  
20 unable to complete his work at -- at Coffee County?

21 A I didn't understand your question.  
22 I'm sorry.

1 Q Did he tell you if -- that he had not  
2 been able to finish his work, Mr. Lenberg?

3 A I don't recall.

4 Q Okay. Did you ever say no to any  
5 request that Mr. Lenberg made for information or  
6 access to Coffee County equipment?

7 A I don't recall. I'm sorry.

8 Q Same question for Mr. Logan. Do you  
9 recall ever saying no to Mr. Logan to any request  
10 for information or access to -- to any equipment in  
11 the Coffee County Election Office?

12 A I don't recall.

13 Q If you would turn back to Exhibit 4.

14 A Okay.

15 Q If you would turn to the page that is  
16 numbered four at the bottom left of that exhibit.  
17 And this would be a text from Cathy Latham to you,  
18 correct?

19 A I think so, yes.

20 Q And it says -- it's dated July 15th.  
21 Do you know what year that was?

22 A 2021.



1           Q       And do you know -- did you have any  
2       understanding or did you ask Ms. Latham why in July  
3       she was asking you about the identity of the people  
4       who came to Coffee County in January?

5           A       No, sir.

6           Q       But you gave her the information that  
7       Scott Hall and Jeff Lenberg had been there in  
8       January. Do you see that?

9           A       Yes, sir.

10          Q       And then -- and then she also asked  
11       you about the Dominion guy that was from Colorado,  
12       the one who was extra. Do you see that?

13          A       I do.

14          Q       And did you have an understanding of  
15       why Ms. Latham was asking about him?

16                   MR. MILLER: Object to form.

17                   THE WITNESS: No, sir.

18       BY MR. BROWN:

19          Q       But that was Samuel, correct?

20          A       Correct.

21          Q       Ms. Hampton, I made a series of  
22       mistakes in the dates of the visits of Mr. Logan.

1 And it appears from the record that Mr. Logan was  
2 there on the 18th and the 19th, and I think I said  
3 the 17th and the 18th. Would that change your  
4 responses to any of my questions about their visit?

5 A No, sir.

6 Q Thank you. Sorry about that.

7 If you would turn to page 5 of  
8 Exhibit 4. And this takes us back to January 5,  
9 2021. Do you see that?

10 A I do.

11 Q And are those your -- your words to  
12 Ms. Latham, "You -- you okay?" Do you see that?

13 A Yes.

14 Q And do you recall what you were --  
15 you were referring to?

16 A I think that's when she had a student  
17 at school that committed suicide.

18 Q Okay. The next text you say, "If you  
19 need me Friday, get me the same thing you got and  
20 the board can't stop me."

21 Do you see that?

22 A I do.

1 Q And what were you referring to?

2 A I don't recall.

3 Q In the next text you say to

4 Ms. Latham, "I hope and pray you are not catching  
5 any heat from your work today."

6 What were you referring to?

7 A She had done a -- a live feed from  
8 the -- like go live, or whatever it was called, a  
9 video, and some of the activists in the community  
10 was being ugly to her, telling her like how she  
11 shouldn't be a teacher, and that kind of stuff.

12 Q Is that relating to the -- the work  
13 that she does as a teacher?

14 A Excuse me?

15 Q Is that related to her teaching?

16 A Yes, sir.

17 Q Not about politics or the election?

18 A No, sir.

19 Q Okay.

20 A Not that I can remember.

21 Q And then the next text she sends you  
22 the -- the e-mail address of Scott Hall. Is that

1 right?

2 A I have no idea whose e-mail that is.

3 Q Okay. And then the next page, page 6  
4 of Exhibit 4, she -- Ms. Latham texts you that  
5 says, "Team left Atlanta at 8." Do you see that?

6 A I do.

7 Q Does that indicate that -- that you  
8 knew what was going on at that time, correct -- by  
9 that time, right?

10 A At that moment, yes, sir.

11 Q Okay. She also tells you that,  
12 "Scott, first name only, is flying in." Do you see  
13 that?

14 A I do.

15 Q She then says, "I could not get Lane  
16 to commit. I trust you all." Do you know what she  
17 was referring to?

18 A The vote review panel.

19 Q Okay. So that relates to the -- to  
20 people coming in for the vote review panel. Is  
21 that right?

22 A Yes, sir.

1 Q The next text you say -- or she says,  
2 I'm sorry, "How is it today? Finished?" Do you  
3 see that?

4 A I do.

5 Q And the answer may be somewhere, it's  
6 not on the next page, but let me continue.

7 And on the next page, page 7, you say  
8 at 3:48, "Going great so far." Do you see that?

9 A I do.

10 Q Now, that's referring to  
11 SullivanStrickler's access to the equipment and  
12 software. Is that right?

13 A I don't recall.

14 Q If you skip over to page 8, on  
15 January 10.

16 A Can you scroll up, please?

17 Q Had you borrowed Cathy Latham's  
18 church's scanner?

19 A I remember she brought a scanner.

20 Q What for?

21 MR. MILLER: Object to form.

22 THE WITNESS: I'm trying to remember.

1 BY MR. BROWN:

2 Q Were you scanning ballots at that  
3 time?

4 A I don't recall.

5 Q At any point after the senate  
6 runoffs, were you scanning ballots?

7 A I don't remember. I'm sorry. I  
8 don't recall.

9 Q If you turn the page to page 9 of  
10 Exhibit 4, Ms. Latham says, "Are you going to be on  
11 the Georgia Secretary of State webinar today?" Do  
12 you see that?

13 A I do.

14 Q And you tell Ms. Latham -- you ask  
15 Ms. Latham, "Do I need to be looking for  
16 something?" Do you see that?

17 A I do.

18 Q Do you know what she was referring to  
19 when she says, "I looked at the -- looked at the  
20 itinerary and didn't see anything suspicious"?

21 Do you see that?

22 A I do.

1 Q Do you know what she was referring  
2 to?

3 MR. MILLER: Object to form.

4 THE WITNESS: Not at this time. I  
5 don't remember.

6 BY MR. BROWN:

7 Q And if we could mark Tab 26 as  
8 Exhibit 12.

9 (Hampton Deposition Exhibit Number 12  
10 marked for identification.)

11 BY MR. BROWN:

12 Q And just let me know when that comes  
13 up.

14 MS. ELSON: Bruce, I'm sorry, can you  
15 say --

16 MR. BROWN: Yeah, Tab -- Tab 26 was  
17 the -- which is the Shawn Still lawsuit.

18 MS. ELSON: Thank you. I apologize.  
19 That should be up momentarily.

20 MR. BROWN: And I believe that's  
21 Exhibit 12, right?

22 MS. ELSON: Correct.

1 THE WITNESS: It's up.

2 BY MR. BROWN:

3 Q Were you aware that a lawsuit had  
4 been filed against you by Shawn Still in the Fulton  
5 County -- in the Superior Court of Fulton County?

6 A I remember briefly of a lawsuit, but  
7 I don't remember what it was.

8 Q Did you give Tony Rowell the -- the  
9 permission to accept service of process of this  
10 lawsuit on your behalf?

11 A Not that I'm aware of, no, sir.

12 Q When is the first time you saw a copy  
13 of this lawsuit, if you recall?

14 A Oh, Lord, I don't remember. I mean,  
15 I don't even know which -- I don't know what this  
16 lawsuit is.

17 Q It's a lawsuit, it's against Coffee  
18 County. You don't remember the substance of a  
19 lawsuit against Coffee County relating to the  
20 presidential election of 2020?

21 A I vaguely remember one, but I don't  
22 remember its contents. I don't remember what it



1 was about.

2 Q Turn, if you will, to the paragraphs  
3 32 of the complaint. And what -- and is that on  
4 page 32, do you think? I'm trying to get mine to  
5 cooperate. Hold on one second.

6 MS. MARKS: It's behind Exhibit 2.

7 THE WITNESS: He's not there right  
8 now.

9 MS. MARKS: Okay.

10 THE WITNESS: Is it behind Exhibit 2  
11 Ms. Marks asked?

12 MR. BROWN: It's Exhibit 12.

13 MS. MARKS: Within Exhibit 12, is it  
14 right behind Exhibit 2?

15 THE WITNESS: Within Exhibit 12, is  
16 it behind Exhibit 2?

17 I mean, can you message him that?

18 MR. BROWN: Hang on a second. Well,  
19 look at the -- look at the 32nd page of the PDF.

20 THE WITNESS: If you scroll --

21 MS. MARKS: We can't see those  
22 numbers. We can't see the PDF numbers, but I

1 think --

2 MS. LAROSS: If you hover along the  
3 bottom, in that little black box --

4 MS. MARKS: Oh, there is -- thank  
5 you.

6 MS. LAROSS: 32 and 83, that's  
7 what --

8 MS. MARKS: That is 32 of 83. Thank  
9 you, Diane.

10 MS. LAROSS: You're welcome.

11 THE WITNESS: Okay. There's a  
12 worksheet on the screen.

13 BY MR. BROWN:

14 Q Exactly.

15 And -- and the plaintiff is Shawn  
16 Still. Do you know how Mr. Still or his lawyers  
17 got the information that's in the worksheet that is  
18 on page 32?

19 A I do not.

20 Q Do you know how they got any of the  
21 information in this lawsuit about Coffee County?

22 A I do not.

1 Q Did you know about any of the  
2 meetings between Robert Preston, Alex Kaufman, and  
3 Robert Sinners in Douglas?

4 A No, sir.

5 Q Do you know who prepared the  
6 worksheet that's on page 32 of the complaint?

7 A I think I did.

8 Q And did you -- did you provide that  
9 to the plaintiff, either in response to an Open  
10 Records Act or otherwise?

11 A Not that I recall.

12 Q Was it a public document?

13 A I think so because it was part of a  
14 board meeting, I think.

15 Q Okay. Turn to page 40. Are you with  
16 me?

17 A I am.

18 Q Do you see that worksheet?

19 A I do.

20 Q Do you know who prepared that  
21 worksheet?

22 A I think I typed it.

1 Q And do you know how the plaintiff got  
2 it?

3 A No, sir.

4 Q Turn over to page 42.

5 A I'm there.

6 Q Is that your worksheet also?

7 A Yes, sir.

8 Q And do you know how the plaintiff got  
9 that worksheet?

10 A No, sir.

11 Q Did you give these worksheets to your  
12 lawyer, Tony Rowell?

13 A Yes, sir.

14 Q And did you understand that he was  
15 going to give them to the plaintiffs?

16 A No, sir.

17 Q And why did you give them to Tony  
18 Rowell?

19 A Because he was the county attorney.

20 Q And it was normal for you to give  
21 that kind of information because he was the county  
22 attorney?

1 A If he asked for it, yes, sir.

2 Q And he asked for this information?

3 A He's the one that told me the numbers  
4 to put in there --

5 Q He's the one --

6 A -- after the report.

7 Q He's the one that told you what? I'm  
8 sorry, I just didn't hear you.

9 A The numbers to put in there after  
10 reading the report.

11 Q Which report?

12 A The election summary report, I  
13 believe.

14 Q What was the occasion for him asking  
15 you to do that?

16 Was it at a board meeting or just a  
17 normal reporting or -- or what?

18 A This is --

19 MR. MILLER: Object to form.

20 THE WITNESS: This was during the  
21 recount.

22

1 BY MR. BROWN:

2 Q And did he tell you why he needed  
3 this information?

4 A I think it was included in a letter  
5 that we sent up to the Secretary of State's office.

6 Q Do you know why the lawsuit -- or did  
7 anyone tell you why the lawsuit was dismissed the  
8 same day as SullivanStrickler was there getting  
9 access to the election equipment?

10 A No, sir.

11 Q And do you recall Robert Sinners  
12 making several Open Records Act requests to you?

13 A I remember there being multiple open  
14 records requests, I didn't -- don't remember the  
15 names of them, no, sir.

16 Q Okay. And let me mark Tab 17 as  
17 Exhibit 13.

18 (Hampton Deposition Exhibit Number 13  
19 marked for identification.)

20 THE WITNESS: It's there.

21 BY MR. BROWN:

22 Q And Exhibit 13 is an e-mail from you

1 to Mr. Sinners' Gmail e-mail address, correct?

2 A Correct.

3 Q And here's where I'm curious, you're  
4 responding to an e-mail that's dated November 10th.  
5 Do you see that?

6 A I do.

7 Q So he's asking you under the Open  
8 Records Act for information. And your response is,  
9 "Are you still working with the Trump campaign?"

10 Do you see that?

11 A I do.

12 Q Why did you ask him that in response  
13 to his question under the Open Records Act?

14 A I think that was in reference to an  
15 open records request that he sent directly to me  
16 first that had the Trump campaign on it or  
17 something.

18 Q Is -- was Mr. Sinners' Trump's man  
19 that was referred in one of the text?

20 A I have --

21 MR. MILLER: Object to the form.

22 THE WITNESS: I have no idea.

1 BY MR. BROWN:

2 Q I'm going to mark Tab 4 as Exhibit  
3 14.

4 (Hampton Deposition Exhibit Number 14  
5 marked for identification.)

6 BY MR. BROWN:

7 Q Do you have that in front of you?

8 A I do.

9 Q Do you know who Christina Read is?

10 A I do not.

11 Q Have you seen this document before?

12 A No, sir. Not that I'm aware of, no,  
13 sir.

14 Q Did you know that Mr. Chaney was  
15 involved in collecting affidavits with Mr. Sinners?

16 A I was not aware, no, sir.

17 Q Did Mr. Chaney share with you the  
18 fact that he was collecting affidavits?

19 A You're going in and out on me. I'm  
20 sorry.

21 Q Oh, I'm sorry.

22 Did you ever discuss with Mr. Chaney



1 the fact that he was working with Mr. Sinners  
2 collecting affidavits that would be used in the  
3 lawsuit against Coffee County?

4 A Not to my recollection, no, sir.

5 Q Do you recall anyone that was  
6 associated with Coffee County Elections assisting  
7 in any way the plaintiff in the lawsuit against  
8 Coffee County?

9 A No, sir.

10 Q And just for the record, I need to  
11 get another one in the record. If would you mark  
12 Tab 16 as Exhibit 15.

13 (Hampton Deposition Exhibit Number 15  
14 marked for identification.)

15 BY MR. BROWN:

16 Q And I'm not sure how that page has  
17 come out in the exhibit, because mine are  
18 backwards, but --

19 A It's up.

20 Q If you could do me a favor, I want to  
21 make sure our pagination is correct, but what is  
22 the -- if you look at the bottom of the page of

1 Exhibit 15, what is the page number that's centered  
2 in the bottom?

3 A 207.

4 Q Okay. If you would go to the last  
5 page of this exhibit, which is actually page 205.  
6 Are you with me?

7 A Yes, sir.

8 Q And these are e-mails between you and  
9 Mr. Sinners, correct?

10 A If she'll be able to keep it still,  
11 I'll be able to read it.

12 MS. MARKS: Oh, I'm sorry.

13 THE WITNESS: It says, "Thank you,  
14 Robert."

15 BY MR. BROWN:

16 Q And do you recall him asking for the  
17 meeting minutes?

18 A There was -- I guess so. I mean, the  
19 document speaks for itself.

20 Q Ms. Hampton, the County has been  
21 unable to recover your old e-mails or Jil's old  
22 e-mails. Were -- would you have kept copies of

1 those e-mails on the desktop computer at the  
2 election office?

3 A I don't recall.

4 Q Do you know how they were saved or if  
5 they were archived?

6 A I think we used Outlook.

7 Q Was it Outlook on the -- on the web  
8 or did you have a specific -- or did you have a  
9 desktop application?

10 A I had a desktop icon, so I don't  
11 know. I can't answer that.

12 Q Okay. And you didn't do any -- did  
13 you do anything to -- I'm not suggesting you did,  
14 but did you do anything to destroy your e-mails  
15 when you left?

16 A No, sir.

17 Q After you left did you have access to  
18 your Coffee County election's e-mails?

19 A No, sir.

20 Q Do you have any reason to believe  
21 that Jil was -- was Jil set up the same, she had  
22 a -- a desktop with the Outlook on the desktop?

1 A Yes, sir.

2 Q And you don't know whether she  
3 destroyed any of her e-mails, do you?

4 A I can't answer that question. No,  
5 sir.

6 Q Ms. Hampton, I have some questions  
7 about the passwords that you used to access the  
8 election software. The -- the EMS -- the main EMS  
9 server was password protected, correct?

10 A Correct.

11 Q To get into the EMS server, did you  
12 need one password or were there a couple of  
13 gateways that you needed additional passwords for?

14 A I don't remember how many passwords.

15 Q As far as you know, there was one?

16 A I know there was one, but I don't  
17 know if there was more or not, I can't remember.

18 Q Now, do you recall that in your video  
19 there was a Post-It note that showed a password?  
20 Do you recall that?

21 A I do.

22 Q And what was that a password for?

1           A        I -- it was for the system, but I  
2       don't remember -- I mean, it was for that election,  
3       the 2020 election.

4           Q        Was it the password that was specific  
5       to that election or was it for the EMS server, if  
6       that makes any sense?

7           A        For that election.

8           Q        Okay. So you needed that to get  
9       information from the Secretary of State about the  
10      2020 election, correct?

11          A        The Secretary of State's office gave  
12      us those passwords.

13          Q        And that was different than the  
14      password to the EMS server itself, correct, or was  
15      it the same?

16          A        I can't recall. I know -- I know it  
17      was a password given by the Secretary of State, but  
18      I don't remember exactly which program it went to.

19          Q        After the password was exposed  
20      online, did anyone ask you to change the password?

21          A        That password was for the 2020  
22      election and the 2020 election was over when the

1 video went live or went over the internet.

2 Q Okay. Did you ever change the  
3 password to the EMS server?

4 A Not that I recall, no, sir.

5 Q Did you -- did you have the  
6 authority -- the administrative authority to change  
7 the password on the EMS computer?

8 A No. Not that I was aware of, no,  
9 sir.

10 Q Okay. And who did, to the best of  
11 your knowledge?

12 A The Secretary of State's office.

13 Q And I'm referring to the server  
14 itself, not to an election-specific password. Do  
15 you follow me?

16 A I -- yes, sir, I follow you.

17 Q Okay. It's your understanding that  
18 the local election people did not have the  
19 administrative authority to change the -- the  
20 password on the EMS server, correct?

21 A Correct.

22 MS. LAROSS: Objection as to form.

1 BY MR. BROWN:

2 Q Do you know if Dominion changed the  
3 password on the EMS server?

4 A I do not know that.

5 Q Did you -- did you hear that after  
6 you left, the election's people there in Coffee  
7 County could not access the server because they  
8 didn't know the password?

9 Did you hear that?

10 A I heard that.

11 Q And how did you hear that?

12 A I don't remember how I heard that.

13 Q It seems odd that if the Secretary of  
14 State is the only person who can change the  
15 password, then it would be hard to find out the  
16 password was. I mean, couldn't you just -- the  
17 right person call the Secretary of State and say,  
18 "Hey, what's my password"?

19 MR. MILLER: Object to form.

20 MS. LAROSS: Object as to form.

21 BY MR. BROWN:

22 Q Right?

1                   If you get two people objecting, that  
2 usually means you're getting warm to something, but  
3 let me ask a better question. The objections were  
4 good.

5                   Was it -- James Barnes was the  
6 election director after you, correct?

7                   A       I do not know.

8                   Q       Okay. But somebody was having  
9 difficulty getting into the EMS server after you  
10 left, correct?

11                  A       I do not know.

12                  Q       Okay. I just asked you -- maybe I  
13 misunderstood, but I just asked you whether after  
14 you left you knew that they were -- people were  
15 having difficulty getting into the EMS server. Do  
16 you recall that?

17                  A       Correct.

18                  Q       Okay. And do you recall what the  
19 trouble was in getting in -- into the EMS server?

20                  A       I was told by rumor that they  
21 couldn't get into the password.

22                  Q       Okay. That they didn't have the



1 password?

2 A That they could not get into it with  
3 the password.

4 Q Even with the password, or with the  
5 password they had, right?

6 A Correct.

7 Q And did they ask you about what the  
8 password was?

9 A I have not been contacted by anyone  
10 from that Board.

11 Q Okay.

12 A After nine years of devoting my world  
13 to them, and as a family, no one has ever reached  
14 out to me from that Board.

15 Q Did any other Coffee County official  
16 have access to the server besides you?

17 A Jil did.

18 Q Other than Jil and you?

19 A I don't know that anyone knew how to  
20 operate it.

21 Q But as far as you know, no one else  
22 had the pass code or had access to it, correct?

1 A Correct.

2 Q If -- if I could mark Exhibit 37 as  
3 Exhibit 16 -- Tab 37 as Exhibit 16.

4 (Hampton Deposition Exhibit Number 16  
5 marked for identification.)

6 THE WITNESS: It's up.

7 BY MR. BROWN:

8 Q And what is Exhibit 16?

9 A It looks like a password.

10 Q Is that your handwriting?

11 A At the top, yes.

12 Q And do you know what that was a  
13 password to?

14 A Something to do with the election of  
15 2020.

16 Q Does that look like an  
17 election-specific password?

18 A Yes.

19 Q So is it your testimony that that  
20 would not be the password for the EMS server itself  
21 probably?

22 A That's a password given by the State

1 for an election and each election has a different  
2 password.

3 Q And -- and just to get at this again,  
4 it's a different password than you would need to  
5 get into your particular EMS server, correct?

6 A Correct.

7 MR. BROWN: Okay. I'm going to take  
8 a break until 4:45 and then try to wrap it up. I'm  
9 not saying we'll wrap it up quickly, because I need  
10 to work and get organized, so if we could take  
11 about a 15-minute break, I would appreciate it.  
12 Thank you.

13 VIDEOGRAPHER: We are going off the  
14 record at 4:29.

15 (Recess from 4:29 p.m. to 4:51 p.m.)

16 VIDEOGRAPHER: We are on the record  
17 at 4:51.

18 BY MR. BROWN:

19 Q Ms. Hampton, let me show what has  
20 been marked as Exhibit 17, which is Tab 41.

21 (Hampton Deposition Exhibit Number 17  
22 marked for identification.)

1 THE WITNESS: It's up.

2 BY MR. BROWN:

3 Q And what does Tab 41 show -- I'm  
4 sorry, Exhibit 17 show?

5 A It looks like a video of -- or a  
6 frame of the election's office.

7 Q And is there a date stamp on it?

8 A Yes.

9 Q And what's the date?

10 A January the 7th of '21.

11 Q And do you see the gentleman behind  
12 Cathy Latham?

13 A I do.

14 Q Is that Miles Latham?

15 A Yes.

16 Q And do you see -- is Jil's desk in  
17 the Exhibit -- shown in Exhibit 17?

18 A It is.

19 Q And it faces -- if you're sitting on  
20 the desk, it would face your office, correct?

21 A Correct.

22 Q And your office has a -- has a glass

1 window?

2 A Correct.

3 Q So Ms. Ridlehoover could see right  
4 into your office, correct?

5 A Ms. Ridlehoover, yes.

6 Q Thank you. Sorry.

7 I would like to mark as Exhibit 18  
8 Tab 39.

9 (Hampton Deposition Exhibit Number 18  
10 marked for identification.)

11 BY MR. BROWN:

12 Q Do you see that?

13 A Not yet.

14 It's up.

15 Q And do you know who that is shown in  
16 tab -- in Exhibit 18?

17 A I do not.

18 Q I'd like to mark as Exhibit 19, Tab  
19 40.

20 (Hampton Deposition Exhibit Number 19  
21 marked for identification.)

22 THE WITNESS: It's up.

1 BY MR. BROWN:

2 Q And do you recognize the people in  
3 Tab 40 -- I'm sorry, Exhibit 19?

4 A Two of them positively.

5 Q And who are the -- could you describe  
6 them with reference to Exhibit 19?

7 A The female is Cathy Latham, and the  
8 one with the Coffee hat on, or the "C," is Eric  
9 Chaney?

10 Q Okay. And who else do you see in  
11 Exhibit 19 that you recognize?

12 A I can't see their faces.

13 Q Is one of them Mr. Cruce?

14 A I have no idea.

15 Q Okay. Ms. Hampton, the -- the videos  
16 of your office show a number of -- of meetings in  
17 your office from time to time. And it appears that  
18 throughout December you had a number of meetings  
19 with Ed Voyles. And -- and could you just describe  
20 generally why you would be meeting with Ed Voyles?

21 A Ed was the ex-chairman of the Board.

22 Q Right, but he's ex-chairman of the

1 Board, meaning he was not a board member, right?

2 A Correct.

3 Q And so what business did you have  
4 with him relating to elections?

5 A He was a voter of Coffee County.

6 Q Right, but what did he contribute to  
7 those meetings?

8 What was -- what was he doing in the  
9 meetings? Was he just being a voter?

10 A He would stop by from time to time to  
11 check in, see how things were going. I mean, he  
12 was a friend and didn't have to have a agenda to  
13 stop by.

14 Q And did -- did you tell him to come  
15 by on January 7th?

16 A I don't recall.

17 Q You might have?

18 A I don't recall.

19 Q The videos also show a number of --  
20 of meetings, some of which Mr. Voyles was also  
21 present, in which Tony Rowell was in your office in  
22 December quite frequently. And what were the

1 purpose of those meetings?

2 A Tony Rowell was the county attorney.

3 Q Right, but -- and -- and -- but in  
4 many of those meetings they were people like  
5 Mr. Voyles who attended. What were you all talking  
6 about?

7 MR. MILLER: Object to form.

8 THE WITNESS: I can't remember our  
9 conversation, sir.

10 BY MR. BROWN:

11 Q Let me direct your attention back to  
12 Exhibit 5, which is the Signal texts that were  
13 produced by Mr. Logan.

14 A Okay.

15 Q And on the first page there,  
16 Mr. Penrose says, "I'd like to introduce ? and ?  
17 they work on my team doing the investigation. I  
18 want them to start this group so we can get to the  
19 bottom of any outside access to your voting  
20 machines."

21 Do you see that?

22 A I do.



1           Q       Was -- was there some concern that  
2       someone had had outside access to your voting  
3       machines?

4           A       I don't know what that's pertaining  
5       to, sir.

6           Q       And did you know Mr. Penrose before  
7       this such that he would be the one introducing you  
8       to Lenberg and Logan?

9           A       I don't know Mr. Penrose as a -- I  
10       don't know.

11          Q       But it looks like he's introducing  
12       people to you in a way that he already knew you,  
13       right?

14          A       I don't know that he's talking about  
15       me.

16          Q       Okay. And you don't recall the  
17       objective of Mr. Lenberg and Mr. Logan's work in  
18       Coffee County to be relating to getting to the  
19       bottom of any outside access to your voting  
20       machines?

21          A       Repeat the question, please.

22          Q       You don't recall that the -- that the

1 work of Mr. Logan and Mr. Lenberg might have been  
2 related to outside access to your voting machines?

3 A I'm going to plead the Fifth on that.

4 Q I didn't hear what you said.

5 A I said I'm going to plead the Fifth  
6 on that.

7 Q Okay. Do you know anything about  
8 someone having outside access to your voting  
9 machines other than the people that you gave  
10 authorization to?

11 A No, sir.

12 Q Did Mr. Logan or Mr. Lenberg speak  
13 with you about work that they were doing for other  
14 counties in Georgia relating to their election  
15 equipment?

16 A Not to my recollection, no, sir.

17 Q Did anyone other than you have a key  
18 to the election office?

19 A Yes, sir.

20 Q Who?

21 A Jil, C.T. Peavy.

22 Q Okay.

1 A Wesley Vickers.

2 Q Who -- who is Ms. Peavy?

3 A Who is who, please?

4 Q Ms. Peavy -- was it Ms. Peavy? Is  
5 that what you said?

6 A No, sir. C.T. Peavy.

7 Q Okay. Who -- who is that?

8 A He was a board member.

9 Q How do you spell his name?

10 A The letter C, dot, T, dot, Peavy,

11 P-E --

12 Q And he was a --

13 A -- V-E-Y, I think.

14 Q And he was an election board member?

15 A Yes, sir.

16 Q Okay. Did -- and did -- do you  
17 recall our discussion before when we were going  
18 through the board members who had spoken with  
19 Mr. Chaney about getting a third party to have  
20 access to the election equipment?

21 Do you recall that testimony?

22 A Yes, sir.

1 Q And did Mr. Peavy -- I'm sorry, what  
2 was his name again?

3 A Peavy.

4 Q Okay. Did -- did Mr. Chaney indicate  
5 that Mr. Peavy had concurred in the direction for  
6 you to give the third party access to the election  
7 equipment?

8 MR. MILLER: Object to form.

9 You can answer the question.

10 THE WITNESS: Mr. Peavy was at that  
11 time -- I think it was close to the end of the  
12 year, the last couple of months he was inactive  
13 basically because of the health of -- I think it  
14 was his wife or either his dad, I can't remember.

15 BY MR. BROWN:

16 Q Okay. So he would not have been  
17 involved in that decision then?

18 A No, sir. He wasn't even at the last  
19 couple of meetings.

20 MR. MILLER: Object to form.

21 BY MR. BROWN:

22 Q And then who was the -- the last

1 person that you mentioned that had a key?

2 A Wesley Vickers.

3 Q And who's that?

4 A County manager.

5 Q Anybody else have keys?

6 A I don't know. Not that I know of.

7 Q Did Eric Chaney have a key?

8 A I don't know.

9 Q Do you know whether Mr. Lindell  
10 obtained Coffee County voting system data?

11 A I do not know.

12 Q Have you heard anyone say that  
13 Mr. Lindell had Coffee County voting data?

14 A Not to my knowledge.

15 Q Did Mr. Lindell bring with him to his  
16 trip to Douglas a -- an expert or a technical  
17 person of some kind?

18 A I don't know.

19 Q Did you speak with Ms. Latham about  
20 Mr. Lindell's visit to Douglas?

21 A I don't recall.

22 Q Do you recall speaking with anybody

1 else about Mr. Lindell's visit to Douglas?

2 A I don't recall.

3 Q I'd like to mark Tab 29 as Exhibit  
4 20.

5 (Hampton Deposition Exhibit Number 20  
6 marked for identification.)

7 BY MR. BROWN:

8 Q And just tell me when it comes up.

9 A It's up.

10 Q And do you see the time -- is there a  
11 timestamp on that still photo? I don't think there  
12 is.

13 A I don't see one.

14 Q And is this a photograph of the  
15 SullivanStrickler people in the Coffee County  
16 Offices?

17 A Yes, I think so.

18 Q That's your -- that's your office,  
19 isn't it?

20 A Yes.

21 Q All right. I would like to mark Tab  
22 30 as Exhibit 21.

1 (Hampton Deposition Exhibit Number 21  
2 marked for identification.)

3 BY MR. BROWN:

4 Q And just tell me when that comes up.

5 MS. ELSON: This is a large file, so  
6 it may be a minute.

7 MR. BROWN: Okay.

8 THE WITNESS: Okay. It's up.

9 BY MR. BROWN:

10 Q And does that appear to be a  
11 photograph taken inside the Coffee County Election  
12 offices?

13 A What page are you talking about?

14 Q Okay. I'm on Tab 30. Is that what  
15 you're on?

16 A Yes, sir.

17 Q Mine is just one page.

18 A Ours is multiple pages.

19 Q Okay. Well, looking at the first  
20 page, do you -- do you see a photograph of two  
21 gentlemen?

22 MS. MARKS: Ask him if this is --

1 where is this from, that one right there.

2 THE WITNESS: Ms. Marks is asking is  
3 it the one with the laptop in front?

4 BY MR. BROWN:

5 Q Yes.

6 A Okay.

7 Q Do you see that?

8 A I do.

9 Q And who's the gentleman on the right  
10 who's smiling?

11 A Ed Voyles.

12 Q And who is the gentleman in the  
13 middle with the baseball cap on?

14 A That is Eric Chaney. That's what --  
15 what page? Page 12.

16 Q Thank you.

17 MR. BROWN: Okay. I'm going to turn  
18 over the examination to co-counsel at this time.

19 EXAMINATION BY COUNSEL FOR CURLING PLAINTIFFS

20 BY MS. ELSON:

21 Q Hi, Ms. Hampton. My name's Hannah.

22 I am here representing different parties in this



1 case, Curling Plaintiffs. And I know these things  
2 are a marathon, so we really appreciate your time.  
3 Just a couple more questions.

4 So I know you mentioned that one of  
5 the scanners in the Secretary's office -- or that  
6 the Secretary's office wanted you to use was giving  
7 you a hard time.

8 Would you prefer using hand-marked  
9 paper ballots in elections in Coffee County?

10 MS. LAROSS: Objection as to form.

11 THE WITNESS: I don't have a  
12 preference.

13 BY MS. ELSON:

14 Q Besides what we've already discussed  
15 today, while you were working with Coffee County,  
16 did you ever notice any security flaws or  
17 vulnerabilities that concerned you with the  
18 Dominion equipment?

19 MS. LAROSS: Objection as to form.

20 THE WITNESS: Vulnerabilities, is  
21 that what you asked?

22

1 BY MS. ELSON:

2 Q Yes, security flaws or  
3 vulnerabilities.

4 A Yes.

5 Q Can you tell me about those?

6 MS. LAROSS: Objection as to form.

7 THE WITNESS: One would be the  
8 adjudication process. If you don't have an honest  
9 supervisor or an honest person doing the  
10 adjudication, they can change the vote of a voter.  
11 No one should have that access.

12 BY MS. ELSON:

13 Q Any other security flaws or  
14 vulnerabilities you can recall?

15 MS. LAROSS: Object as to form.

16 THE WITNESS: Poll pads being able to  
17 be connected to wifi. It was an actual Apple iPad.

18 BY MS. ELSON:

19 Q All right. I know Bruce just asked  
20 some questions about passwords. I just want to  
21 straighten up some facts about these passwords, so  
22 I'm going to introduce -- what exhibit are we on --

1 Exhibit 21.

2 A Exhibit 22.

3 Q Oh, yeah, thanks. Apparently I can't  
4 count. All right. Bear with me, I'm doing two  
5 things at once.

6 (Hampton Deposition Exhibit Number 22  
7 marked for identification.)

8 BY MS. ELSON:

9 Q All right. Let me know when you can  
10 see that exhibit.

11 A And who do you represent again? I'm  
12 sorry.

13 Q The Curling Plaintiffs. We are  
14 co-plaintiffs with Mr. Brown's clients.

15 A It's up.

16 Q All right. Is this you in the image?

17 A It is.

18 Q And where are you seated?

19 A In the GEMS room, as I called it.

20 Q Do you see the -- that small paper  
21 Post-It that's attached to the bottom of the  
22 computer monitor?

1 A I do.

2 Q I have a zoomed-in copy if you can't  
3 see that, but my question for you is, what is that?

4 A That was a password to the election.

5 Q And by "password to the election"  
6 you're referring to those election-specific  
7 passwords that the State released for the election?

8 A Yes. It's the same one that's on the  
9 memo that is on the desk.

10 Q I understand. Thanks.

11 A That is issued by the State.

12 Q And does the State issue the same  
13 password to each county for each election?

14 MR. MILLER: Objection as to form.

15 MS. LAROSS: Objection as to form.

16 THE WITNESS: Yes.

17 BY MS. ELSON:

18 Q Okay. And who has access to that  
19 password, besides you obviously?

20 A Jil had access to it. The Board  
21 members had access to it, but I mean they didn't  
22 know how to ...

1           Q       I'm sorry, I don't want to interrupt  
2       you. Were you finished? I think you were saying  
3       they don't know how to something.

4           A       I mean, it's the password to the  
5       database, so Jil had it, I had it, but I was the  
6       one that always used the computer.

7           Q       I see.  
8                    Do you see the smaller Post-It note  
9       on your desk? It's a yellow Post-It.

10          A       I do.

11          Q       And I also have a zoomed-in copy of  
12       that if you need it, but what is that?

13          A       I can't read it.

14          Q       Okay. Does the second page of that  
15       tab help?

16          A       It's very blurry on this side.

17          Q       Okay. While I'm looking for a  
18       clearer image, I will represent to you that that  
19       Post-It says "SOS\_Georgia." Does that refresh your  
20       recollection at all?

21          A       It was a password, I can't remember  
22       which program it went to.

1 Q Okay. Could it have been the  
2 password to the EMS?

3 A Like I said, I can't remember which  
4 program it went to.

5 Q I got you.

6 A What's it say under it?

7 Q Great question. And I do not know.  
8 I have an associate looking for a clearer image of  
9 that.

10 In the meantime, so we don't waste  
11 time, I'm going to introduce Exhibit 23.

12 (Hampton Deposition Exhibit Number 23  
13 marked for identification.)

14 BY MS. ELSON:

15 Q Tell me when you can see that.

16 A It's up.

17 Q Do you recognize this image?

18 A I do.

19 Q And what is it?

20 A It's the same sticky note.

21 Q And what's the sticky note taped to?

22 A The computer. I can't remember what

1       that piece is called.

2               Q       Oh, yeah.

3               A       I called it "the box" but --

4               Q       Modem?

5               A       Yeah, hard drive, whatever. Yeah.

6               Q       And when you say "computer," do you  
7       mean the computer that's attached to that monitor  
8       we saw in the picture we were just looking at?

9               A       Yes.

10              Q       So this is the box attached to the  
11      monitor in the GEMS room?

12              A       Yes.

13              Q       Okay. Does this refresh your  
14      recollection any more about what the SOS\_Georgia  
15      password is for?

16              A       I think that's the one to the actual  
17      computer.

18              Q       And by that you mean when you turn on  
19      the computer, you have to log into a user account  
20      and that would be the password you use?

21                      And I -- I'm sorry, I know you  
22      haven't answered, but I'll just add that, you know,

1 you don't need to speculate. So if you don't know,  
2 that's fine, but if you want to say that, you know,  
3 it might be that password or -- that's also --

4 A I remember the password and I  
5 remember typing that, but I don't remember which  
6 program it went in to.

7 Q Okay. Could it be the password to  
8 the EMS server? I know you don't remember it  
9 completely.

10 MR. MILLER: Object to form.

11 THE WITNESS: I don't remember. I'm  
12 sorry.

13 BY MS. ELSON:

14 Q No need to be sorry. Thank you. All  
15 right. One more password for you.

16 (Hampton Deposition Exhibit Number 24  
17 marked for identification.)

18 BY MS. ELSON:

19 Q I'm going to introduce Exhibit 24.  
20 Let me know when you can see this one.

21 A It's up.

22 Q All right. I apologize. Do you



1 recognize this password?

2 A I do.

3 Q And what is this the password for?

4 A That is the password issued by the  
5 State for the election.

6 Q Do you remember which election?

7 A 2020.

8 Q And would this be the same case as  
9 previously, in that the State issued the same  
10 password to every county for this election?

11 MR. MILLER: Object to form.

12 MS. LAROSS: Objection as to form.

13 THE WITNESS: Correct.

14 BY MS. ELSON:

15 Q Okay. All right. Did you ever --  
16 and this question doesn't have to do with this  
17 picture.

18 Did you ever change a password to an  
19 EMS server?

20 A No, I did not.

21 Q Did anyone ever ask you to?

22 A No.

1 Q Were you aware of anyone ever  
2 changing a password to the EMS server?

3 A No, I was not.

4 Q Okay.

5 A If they would look underneath the  
6 desk, there's a password taped to the bottom of the  
7 desk.

8 Q And that password would be for the  
9 EMS server?

10 A For the actual -- yeah, to log into  
11 the computer for the first time.

12 Q Okay. And to the best of your  
13 knowledge, does each county have a different EMS  
14 server password?

15 MR. MILLER: Object to form.

16 MS. LAROSS: Objection as to form.

17 THE WITNESS: I don't know that  
18 answer.

19 BY MS. ELSON:

20 Q Okay.

21 A I don't know other counties.

22 Q That's fine. Thank you.

1 All right. So I know Cathy Latham  
2 was brought up earlier. And it's my understanding  
3 that you knew her. I'm curious, what's your  
4 relationship with her?

5 A She's a teacher in Coffee County.

6 Q Did you meet her through her job as a  
7 teacher?

8 A Yes.

9 Q When's the last time you communicated  
10 with Ms. Latham?

11 A I don't remember.

12 Q Fair to say it was a while ago?

13 A It's -- it's been a while, yes.

14 Q We understand from surveillance video  
15 that we've seen that Ms. Latham was here when Scott  
16 Hall and SullivanStrickler -- and I'm sorry, by  
17 "here," I mean the Coffee County Election Office,  
18 that Ms. Latham was there when Scott Hall and  
19 SullivanStrickler were there.

20 What's your understanding of what her  
21 involvement was with those visits?

22 MR. MILLER: Object to form.

1 THE WITNESS: I don't know what her  
2 involvement was.

3 BY MS. ELSON:

4 Q Was she involved in arranging their  
5 visits?

6 MR. MILLER: Object to form.

7 THE WITNESS: I don't know if she  
8 arranged them.

9 BY MS. ELSON:

10 Q Did she speak to people while they --  
11 let me rephrase.

12 Did she speak to Scott Hall or  
13 SullivanStrickler on January 7th, while they were  
14 in the Coffee County Office?

15 A I don't know if she did or not.

16 Q Okay. Do you -- can you tell me  
17 anything about Ms. Latham's relationship with Scott  
18 Hall?

19 MR. MILLER: Object to form.

20 THE WITNESS: No, ma'am, I cannot.

21 BY MS. ELSON:

22 Q Okay. All right. I have a couple of

1 follow-up questions about Signal messages. We  
2 really appreciate you trying to access your -- your  
3 old Signal messages.

4                   Could you walk me through what  
5 exactly you've done to try and recover those?

6           A        I tried to log into it.

7           Q        To the Signal app on your phone?

8           A        I did.

9           Q        And were you -- you were unable to  
10 log in?

11          A        I was unable to log into the one I  
12 used previous, yes.

13          Q        And by "previous," and -- by  
14 "previous," you mean it was a previous account you  
15 used different from the one you use today?

16          A        Correct.

17          Q        Okay. Was it a problem with a  
18 forgotten password?

19                   Why were you unable to log in, if you  
20 know?

21                   MR. MILLER: Object to form.

22                   THE WITNESS: I don't know why I

1       couldn't log in.

2       BY MS. ELSON:

3               Q       Would you be willing to allow us to  
4       try and recover your Signal messages?

5               MR. MILLER: I'm not going to let her  
6       answer that question. I object to form.

7               MS. ELSON: Okay. You're instructing  
8       her not to answer?

9               MR. MILLER: Yeah, I am, I am  
10       instructing her to take the Fifth.

11              MS. ELSON: Okay.

12              THE WITNESS: I take the Fifth on  
13       that.

14       BY MS. ELSON:

15              Q       And this was discussed previously, so  
16       I'm sorry to be a bit duplicative, I just want to  
17       make sure I understand something.

18                     It was Eric Chaney who thought it  
19       would be a good idea for you to make this YouTube  
20       video to educate people about the scanner issue,  
21       correct?

22              A       Correct.

1 Q And you had nothing to do with that  
2 video being released to the public?

3 A Correct.

4 Q When was the last time you spoke to  
5 Mr. Chaney?

6 A February the 25th.

7 Q Of 2022?

8 A '1.

9 Q 2021. Okay.

10 Why was Mr. Chaney dismissed?

11 MS. LAROSS: Objection as to form.

12 THE WITNESS: I have no idea.

13 BY MS. ELSON:

14 Q So I know we spoke a bit about the  
15 SullivanStrickler visit on January 7th, and the  
16 visits later that month by Doug Logan and Jeff  
17 Lenberg.

18 Did anyone help you with the  
19 logistics of arranging the visit by Doug Logan and  
20 Jeff Lenberg to the office?

21 MR. MILLER: Plead the Fifth.

22 THE WITNESS: I take the Fifth on

1 that.

2 BY MS. ELSON:

3 Q And I understand that January 18th  
4 was a holiday, so the office was closed. Who --  
5 did someone tell you that it was okay to open the  
6 office on that day?

7 A I take the Fifth on that.

8 Q Okay. Random question for you. I'm  
9 going to introduce the next exhibit.

10 (Hampton Deposition Exhibit Number 25  
11 marked for identification.)

12 BY MS. ELSON:

13 Q Let me know when you can see that.

14 VIDEOGRAPHER: This is going to be  
15 Exhibit 25, ma'am?

16 MS. ELSON: Thank you, sir.

17 THE WITNESS: It's up.

18 BY MS. ELSON:

19 Q Thank you.

20 It's my understanding that the item  
21 this person is holding is one of those ring lights  
22 that people use behind them when they're live



1 streaming or Zooming. Do you agree with that?

2 A I can't tell what that is.

3 Q Okay. Did Doug Logan or Jeff Lenberg  
4 use a ring light while they were in the Coffee  
5 County Election Office?

6 A Not to my recollection, no.

7 Q Did either of them live stream or  
8 have a Zoom call while they were in the office?

9 A Not that I remember.

10 Q Okay. Do you recall a GBI  
11 investigator showing up while the two of them were  
12 in the office?

13 A No, ma'am.

14 Q And I know this was already discussed  
15 too, but, again, I just want to get a couple of  
16 facts straight about the activities during that  
17 day.

18 So neither Doug -- is it correct that  
19 neither Doug Logan nor Jeff Lenberg touched any of  
20 the equipment while they were in the Coffee County  
21 Office?

22 A Correct.

1 Q Did they access the equipment through  
2 a wireless connection or wifi?

3 MR. MILLER: Object to form.

4 THE WITNESS: I do not know.

5 BY MS. ELSON:

6 Q And I'd like to learn a little bit  
7 more, if possible, about what they were asking you  
8 to do. Were you entering data or pulling commands?

9 And I know that's not a  
10 straightforward question, I'm just giving you some  
11 potential examples to try and show the kinds of  
12 information we're trying to -- to learn here.

13 MR. MILLER: She's going to plead the  
14 Fifth to any questions associated with that line of  
15 questioning.

16 MS. ELSON: Okay.

17 MR. BROWN: Excuse me, the witness  
18 needs to put that --

19 MR. MILLER: I was going to say she  
20 needs to do it.

21 THE WITNESS: I plead the Fifth.

22 MS. ELSON: Thank you.

1 BY MS. ELSON:

2 Q Did you bring in a BMD into the room  
3 while Doug Logan and Jeff Lenberg were there?

4 A I plead the Fifth.

5 Q Did you bring in an ICP?

6 A I plead the Fifth.

7 Q Okay. I know you mentioned that no  
8 one from the Coffee County Board has contacted you  
9 since you were forced to resign. Has anyone from  
10 the Secretary's office contacted you?

11 A Yes.

12 Q And who is that?

13 A I don't remember his name. He was an  
14 investigator.

15 Q Do you know who he was an  
16 investigator with?

17 A He was an investigator with the  
18 Secretary of State's office.

19 Q And about when did he contact you, or  
20 exactly if you know?

21 A I don't remember.

22 Q But it was after you had been forced

1 to resign from your post?

2 A Yes.

3 Q Okay. And did you speak with the  
4 investigator?

5 A I did.

6 Q Did you -- how did you speak with  
7 him? Did you meet in person? Did you e-mail?  
8 Have a phone call?

9 A We had a phone call. It was about  
10 a -- an activist in Coffee County that had touched  
11 the machines.

12 Q Did you speak about anything else  
13 with the investigator?

14 A Did not.

15 Q What activist were you discussing  
16 with the investigator?

17 A Olivia Pearson.

18 Q And when did she -- when did  
19 Ms. Pearson touch the equipment in Coffee County?

20 A I don't remember the date. I'm  
21 sorry.

22 Q That's okay.

1                   And what other details can you tell  
2 me about the conversation you had with that  
3 investigator?

4           A       That's an ongoing investigation and  
5 so I don't think I can discuss it.

6           Q       Okay. Has anyone from the State  
7 Election Board contacted you in regards to the  
8 Coffee County visits by SullivanStrickler or Logan  
9 or Lenberg?

10          A       Have not.

11          Q       Has anyone from the Center for  
12 Election Security contacted you about that topic?

13          A       Not that I'm aware of.

14          Q       Has anyone from any other law  
15 enforcement bodies contacted you about that topic?

16          A       None.

17          Q       Okay. Did the State ever  
18 contacted -- contact you about -- or I'll start  
19 over.

20                   I know that Mr. Brown asked you if  
21 Coffee County ever contacted you requesting your  
22 help after you were forced to resign to get James

1 Barnes, your replacement, access to the EMS, and  
2 your answer was no.

3 Did the State ever contact you after  
4 you were forced to resign asking for help getting  
5 into -- or help with the password for the EMS  
6 server?

7 A No, ma'am.

8 Q Okay. And a few quick questions  
9 going back to SullivanStrickler's visit on  
10 January 7th. Did -- what equipment did they bring  
11 with them into the room?

12 A I don't recall.

13 Q And what did you observe them doing  
14 while they were in your office?

15 And this can be anything you  
16 remember.

17 A I remember them taking pictures of  
18 the SD cards.

19 Q And what SD cards, or what were the  
20 SD cards for?

21 A The scanners.

22 Q Okay. Did they take those pictures

1 with their phones or cameras?

2 A I think it was a little digital  
3 camera.

4 Q Okay. Did they open any equipment  
5 while they were in your office?

6 MR. MILLER: Object to form.

7 BY MS. ELSON:

8 Q I know it was a while ago.

9 A I don't recall.

10 Q Did they plug in any devices into the  
11 equipment?

12 A I don't recall.

13 Q Okay. Did they tell you what they  
14 were doing at any point while they were there?

15 A Did they tell me what they were  
16 doing? Can you --

17 Q Yeah. Did they chat with you or  
18 comment to you about, you know, why they were doing  
19 what they were doing with the equipment?

20 I know you mentioned one example  
21 being them taking pictures of SD cards, but I guess  
22 what would be helpful to know is if they kind of

1 made any comments to you about what they were doing  
2 while they were in your office?

3 A Taking inventory, I guess is what  
4 you'd call it.

5 Q And by "taking inventory," are you  
6 meaning counting the numbers of each kind of  
7 equipment, or can you describe to me a bit about  
8 what that meant to you?

9 A Like what it -- what was used for an  
10 election, I guess, is what that would be.

11 Q I see.

12 Would it be fair, and you correct me  
13 if this is not a correct interpretation of what  
14 you're saying, would it be fair to say they were  
15 trying to learn about how the equipment was used in  
16 your office?

17 MR. MILLER: Object to form.

18 THE WITNESS: I would say that's a  
19 fair statement.

20 BY MS. ELSON:

21 Q Okay. Did they take pictures of  
22 anything else that you remember besides the SD



1 cards?

2 A I can't recall.

3 Q Okay. Did they plug in any cords,  
4 you know, unrelated to the equipment?

5 Did they plug in any of their own  
6 equipment in that room?

7 A I don't recall.

8 Q Okay. Did they ask to see any  
9 equipment that wasn't already in the room when they  
10 got there?

11 A I don't recall.

12 Q Okay. Do you remember whether they  
13 had wireless connections while they were in your  
14 office?

15 A I don't remember.

16 Q Okay. Were you connected to the  
17 internet while they were in your office?

18 A The computer on my desk was connected  
19 to the internet.

20 Q Okay. And that computer is separate  
21 from the computer in the GEMS room. Is that  
22 correct?

1 A Correct.

2 Q Did the visitors log onto your  
3 computer or interact with your computer after you  
4 had logged on?

5 A Not that I recall.

6 Q Okay. Did they interact with their  
7 own computers while they were in the room?

8 A I do not know.

9 Q You don't remember?

10 A No, I do not.

11 Q Okay. All right. One last password  
12 question. I'll represent to you that the witness  
13 for the Secretary of State testified to us that he  
14 understood, and I'm going to read you a quote from  
15 testimony, "Ms. Hampton changed the password on the  
16 EMS server on December 14th of 2020, which the  
17 Secretary's office had directed her to do because  
18 the original password was publicly released in the  
19 video, but then that password was not shared with  
20 the incoming elections director, James Barnes."

21 MS. LAROSS: Objection as to form.

22

1 BY MS. ELSON:

2 Q What's your reaction to that  
3 testimony?

4 MR. MILLER: Who did the testimony?  
5 I'm sorry.

6 MS. ELSON: This was Gabriel  
7 Sterling.

8 THE WITNESS: I did not -- do not  
9 recall any of that.

10 BY MS. ELSON:

11 Q Just going to drill down a bit. So  
12 did you change the password to the EMS server on  
13 December 4th?

14 A I did not.

15 Q Were you directed to change the  
16 password?

17 A No, I was not.

18 Q Thank you. Okay. Almost done.  
19 Did anyone install malware on any  
20 Georgia voting equipment?

21 MR. MILLER: Object to form.

22 THE WITNESS: I do not know.

1 BY MS. ELSON:

2 Q Did anyone try to do that?

3 MR. MILLER: Object to form.

4 MS. LAROSS: Objection as to form.

5 THE WITNESS: I don't know.

6 BY MS. ELSON:

7 Q Did anyone alter any software on the  
8 Georgia voting equipment?

9 MR. MILLER: Object to form.

10 MS. LAROSS: Objection as to form.

11 THE WITNESS: I do not know.

12 BY MS. ELSON:

13 Q Did anyone alter any votes casted in  
14 Georgia?

15 MR. MILLER: Object to form.

16 MS. LAROSS: Objection as to form.

17 THE WITNESS: I do not know.

18 BY MS. ELSON:

19 Q And did anyone alter any election  
20 outcomes in Georgia?

21 MS. LAROSS: Objection as to form.

22 MR. MILLER: Object to form.

1 THE WITNESS: I do not know.

2 BY MS. ELSON:

3 Q Okay. Last question for me right  
4 now. And I'll just remind you that you're under  
5 oath. My question is: Have you produced all of  
6 the documents that you have that are responsive to  
7 the subpoenas that the Plaintiffs served on you?

8 A To the best of my knowledge, I have.

9 Q Okay. Give me one second.

10 I know I said that was my last  
11 question, I have one more to clean up.

12 So you told me that no one had  
13 contacted you from the Secretary of State's office,  
14 Coffee County's office, State Election Board  
15 regarding these visits, or even regarding anything  
16 after you were forced to resign, besides the  
17 investigator who you discussed the activist,  
18 Ms. Pearson with.

19 Did anyone from the Georgia Bureau of  
20 Investigations contact you after you were forced to  
21 resign?

22 A No, ma'am.

1 Q Okay.

2 MS. ELSON: That's it for me. I  
3 really appreciate your time. I know others on the  
4 call might have a few questions, but yeah, it  
5 was -- it was nice talking to you. And I know that  
6 these days are long, so thank you.

7 MR. MILLER: May I add something in  
8 there for clarification about whether or not  
9 investigators have contacted her? They have not  
10 contacted her personally, but I've had two  
11 investigators contact me about her.

12 MR. BROWN: Who and when?

13 MR. MILLER: Bruce, I have his  
14 number -- or his name and number written down.

15 MR. BROWN: What's the organization,  
16 and just generally what time frame?

17 MR. MILLER: Since -- since we have  
18 talked -- after we had our first meeting together,  
19 it was the head investigator from GBI, and then I  
20 also had legal counsel from the Attorney General's  
21 Office contact me.

22 MR. BROWN: And so that would have

1       been sometime in the last three months, right?

2                   MR. MILLER: Yes. Yes.

3                   MR. BROWN: Okay.

4                   MR. MILLER: It was all after we  
5 had -- let me see, the attorney from the Attorney  
6 General's Office contacted me two days before we  
7 had our meeting and then the other gentleman  
8 contacted me the day after that. And I will get  
9 you his name and telephone number.

10                  MR. BROWN: Thank you so much. I  
11 appreciate it, sir.

12                  MR. MILLER: Chris Baldwin at GBI.

13                  MR. BROWN: Okay.

14                  MR. MILLER: And the gentleman from  
15 the Attorney General's Office, I don't remember.

16                  MS. ELSON: I apologize, can you  
17 repeat the first name you said?

18                  MR. BROWN: Chris Baldwin.

19                  MR. MILLER: Thank you.

20                  MS. ELSON: Thank you.

21                  MR. MILLER: And Brian Kern from the  
22 Attorney General's Office.

1 MS. ELSON: Thank you.

2 MR. BROWN: I don't have any more  
3 questions. Does anybody else have any other  
4 questions?

5 MS. LAROSS: I have some questions.  
6 This is Diane. I don't know if the other lawyers  
7 have questions.

8 So why don't I go ahead and  
9 proceed. Is that all right with everyone? Or if  
10 you just want to take a moment to take a breath,  
11 I -- everyone here will understand, if you need  
12 to do it. I don't have a lot of questions, but  
13 that's up to you. I want you to make sure,  
14 Ms. Hampton, that you're comfortable.

15 THE WITNESS: I'm ready to get home,  
16 so let's go on.

17 EXAMINATION BY COUNSEL FOR STATE DEFENDANTS

18 BY MS. LAROSS:

19 Q Okay. All right. As I mentioned  
20 previously, my name is Diane LaRoss. And I  
21 represent the State Defendants and the Secretary of  
22 State and also the State Board Elections in this



1 case, the State Defendants.

2 So you testified already concerning  
3 access by third parties to the Coffee County server  
4 on January 7th, 2021. And I'm going to ask you a  
5 couple of questions about that.

6 So the -- before anyone -- any of the  
7 third parties arrived at the Coffee County Office  
8 to access the server and the election equipment,  
9 did you inform anyone at the Secretary of State's  
10 office that they were coming or that you expected  
11 that they would be accessing the equipment?

12 A I did not.

13 Q And after they were there, did you  
14 contact anyone from the Secretary of State's office  
15 to report that there had been access by third  
16 parties to the election equipment on January 7th,  
17 2021?

18 A Not to my knowledge.

19 Q So -- and I know -- so you said that  
20 you didn't -- didn't contact anyone before they  
21 came on July -- or sorry, on January 7th, before  
22 the third parties came, so you didn't check in with

1 the Secretary's office to make sure that their  
2 visit was okay. Is that correct?

3 MR. MILLER: Object as to form.

4 THE WITNESS: I was doing direction  
5 as my board member told me to do.

6 BY MS. LAROSS:

7 Q And that, I think you mentioned in  
8 your prior testimony, was Eric Chaney?

9 A Correct.

10 Q And Mr. Chaney was the one then that  
11 told you that the third party was going to be  
12 coming -- folks from the third party were going to  
13 be coming to access the computer on January 7th,  
14 correct?

15 A Correct.

16 Q And was it your understanding that he  
17 had contacted any -- do you have any understanding  
18 whether or not he had contacted anyone from the  
19 Secretary of State's office?

20 A I do not know if he did or not.

21 Q And you had mentioned that you didn't  
22 contact anyone from the Secretary of State's office

1 after their visit. And I'm just going to name some  
2 folks and see if that jogs your memory at all.

3 Did you contact Michael Barnes  
4 that -- after the January 7th, 2021 event where the  
5 third parties accessed the server and the election  
6 equipment in Coffee County?

7 A I did not.

8 Q How about, did you tell any county  
9 liaisons or any investigators from the Secretary of  
10 State's office that folks had accessed the Coffee  
11 County server on January 7th?

12 A I did not.

13 Q And why did you not let the  
14 Secretary's office know that there had been access  
15 to the election equipment in Coffee County in -- on  
16 January 7th, 2021?

17 MR. MILLER: I'm going to advise you  
18 accordingly, take the Fifth.

19 THE WITNESS: I take the Fifth  
20 Amendment.

21 BY MS. LAROSS:

22 Q And the same question for why you did

1 not inform the Secretary's office before the folks  
2 came on January 7th, 2021, to access the Coffee  
3 County server and election equipment?

4 A I do not answer to the Secretary of  
5 State's office, I answer to the Board. The Board  
6 answers to the Secretary of State's office.

7 Q So you didn't think it important to  
8 let the Secretary's office know that something like  
9 that was going to happen?

10 A Again, I reported to the Board.

11 Q And I understand that Mr. Lenberg and  
12 Mr. Logan were in the Coffee County Election  
13 Office, I believe, in January 18th and 19th. And  
14 you've already testified about that so I'm going to  
15 ask you similar questions about that visit.

16 Did you inform anyone at the  
17 Secretary of State's office before Mr. Lenberg and  
18 Mr. Logan came to the Coffee County Office, as you  
19 described earlier in your testimony, in late  
20 January of 2021?

21 A I did not.

22 Q And why did you not let the

1 Secretary's office know?

2 MR. MILLER: I advise you to take the  
3 Fifth.

4 THE WITNESS: I take the Fifth.

5 BY MS. LAROSS:

6 Q And then after their visit, did you  
7 inform anyone from the Secretary's office that they  
8 had visited the Coffee County Election Office on  
9 January 18th and 19th?

10 A I did not.

11 Q And I believe you described  
12 previously in your testimony that Mr. Lenberg and  
13 Mr. Logan didn't actually touch the election  
14 equipment.

15 Do I recall that correctly?

16 A To the best of my knowledge.

17 Q And so you didn't see them while you  
18 were with them? You didn't see them touch the  
19 equipment?

20 A I'm sorry, I didn't hear you.

21 Q So you didn't -- you didn't actually  
22 see them touch the equipment while you were there

1 with them on January 18th and the 19th in 2021, in  
2 the Coffee County Election Office?

3 A Not to my knowledge.

4 Q And I think you described that they  
5 were there asking you questions and you physically  
6 were going onto the system. Do I have that  
7 correct?

8 A Yes.

9 Q And what did they ask you to do?  
10 Do you remember anything that they  
11 asked you to do or what they wanted you to -- asked  
12 you to look at? What questions they had?

13 A I don't recall.

14 Q Did you print out anything that they  
15 took from the office on the occasion when  
16 Mr. Lenberg and Mr. Logan were in the office -- the  
17 Coffee County Office in January 18th and 19th in  
18 2021?

19 A I don't remember.

20 Q And I'm not sure I asked you, after  
21 Mr. Lenberg and Mr. Logan were in the Coffee County  
22 Office, did you inform anyone at the Secretary of

1 State's office or connected with the Secretary of  
2 State's office that they had visited the office?

3 A I did not.

4 Q And why not?

5 MR. MILLER: I would advise you to  
6 take the Fifth.

7 THE WITNESS: I take the Fifth.

8 BY MS. LAROSS:

9 Q You testified earlier you said that  
10 you gave a deposition and that you also met with  
11 Ms. Marks previously. Do I have that correct?

12 A That's.

13 Q Okay. On how many occasions did you  
14 meet with Ms. Marks?

15 A I think it's been one, I think.

16 Q Okay. And at that meeting who else  
17 was in attendance at the meeting with Ms. Marks?

18 A Not counting my attorney?

19 Q Oh, sure. So your attorney was  
20 there. So Jonathan was there with you certainly.  
21 Okay.

22 And was -- Ms. Marks, was her

1 attorney there or was there any other people at the  
2 meeting besides you and your attorney?

3 A There was a gentleman and a lady  
4 besides Ms. Marks, but I don't remember the names.

5 Q Could the gentleman have been  
6 Mr. Brown, who has been asking you questions today,  
7 or do you -- any of those -- I don't know if you  
8 can see him on Zoom well enough, but --

9 A I think he was on the phone.

10 Q Oh, okay. Someone was on the phone  
11 and Ms. Marks was in person.

12 A Yes.

13 Q Is that correct?

14 Okay. And where did that meeting  
15 take place?

16 A I don't remember the name of the  
17 hotel in Douglas.

18 Q But it was in Douglas --

19 A Yes.

20 Q -- Georgia?

21 A Yes.

22 Q And when did that meeting happen?



1           A       I don't remember the date.

2           Q       Was it within the last few months or  
3 was it in the last year? Can you estimate for me a  
4 time frame?

5           A       It's been in the last few months, but  
6 my time is all missed -- runs together.

7           Q       Okay. So perhaps in the summer or  
8 into the fall of this year?

9           A       Yeah.

10          Q       And what did you all discuss in  
11 your -- during your meeting when you and your  
12 attorney met with Ms. Marks and someone on the  
13 phone?

14          A       Some of the same information as  
15 today.

16          Q       And what information was that, just  
17 generally, if you can point to what type of  
18 information you all discussed?

19          A       Oh, Lord. Just questions as to the  
20 password, the Secretary of State's office, the  
21 Board of Election.

22          Q       And did you speak specifically about

1 the third party accessing the Coffee County server  
2 on -- on January 7th, 2021?

3 MR. MILLER: You can answer.

4 THE WITNESS: I'm trying to -- yes,  
5 we did. I was trying to remember the questions.

6 BY MS. LAROSS:

7 Q Okay. Is there anything that you all  
8 discussed that you haven't spoken about today  
9 during your deposition?

10 A No.

11 Q Did you bring any documents, either  
12 hard copies or electronically, to the meeting with  
13 Ms. Marks?

14 A I don't think I did.

15 Q So then I -- you didn't provide any  
16 documentation to her during that meeting -- at that  
17 meeting, correct?

18 A I don't think I did.

19 Q What about any pictures or videos,  
20 anything else?

21 I mean, did you provide anything else  
22 that I may not have spoken about to Ms. Marks

1 during that meeting?

2 MR. MILLER: May I interject?

3 MS. LAROSS: Sure.

4 MR. MILLER: Did you send me some  
5 e-mails that I forwarded to Ms. Marks and the other  
6 attorneys?

7 THE WITNESS: Yes.

8 MR. MILLER: Okay.

9 BY MS. LAROSS:

10 Q And those e-mails that you provided  
11 that your attorney just described, have you looked  
12 at them or saw those emails during this deposition  
13 as one of the exhibits or multiple exhibits?

14 A Yes.

15 Q And all of the e-mails that you  
16 provided to Ms. Marks, were they you included in  
17 the exhibits attached to -- that will be attached  
18 to your deposition that we've talked about?

19 A To the best of my knowledge, yes.

20 Q Did Ms. Marks provide you with any  
21 documentation or any -- or show you anything during  
22 that meeting during your discussion?

1           A       Not that we haven't discussed today,  
2       no.

3           Q       Let me take a second, I just want to  
4       make sure.

5                    I think you had talked about the  
6       Secretary of State Inspector Blanchard. Do you  
7       know who I'm speaking about?

8           A       Uh-huh.

9           Q       And you'll have to say verbally for  
10      the record.

11          A       Yes. Sorry.

12          Q       Okay. Now, Inspector Blanchard, I  
13      think you mentioned during your testimony that he  
14      was at the Coffee County Offices on multiple  
15      occasions. Would that be concentrate?

16          A       Yes.

17          Q       And at any time did you let him know  
18      that there had been third parties that had accessed  
19      the Coffee County server or Coffee -- or sorry,  
20      Coffee County server or any of the election  
21      equipment?

22          A       No, because at that time -- I mean,

1 he came multiple time during my tenure there.

2 Q Oh, okay.

3 So did he -- do you recall him coming  
4 to the office after the January 7th, 2021 event  
5 where the third parties accessed the equipment?

6 A No, I do not.

7 MR. MILLER: I need to clarify.  
8 There were -- in the original subpoena, documents  
9 were requested. Okay?

10 MS. LAROSS: Okay.

11 MR. MILLER: Based on that, she went  
12 through her phone, she had no e-mails because all  
13 of her e-mails were on her computer that was at the  
14 office. Or when I say emails, I said it  
15 incorrectly, it's text messages.

16 MS. LAROSS: Text messages. Thank  
17 you for that clarification.

18 BY MS. LAROSS:

19 Q So emails that you had, like a  
20 personal e-mail that you used for any of the  
21 business that you conducted at Coffee County  
22 Election Office. Is that right?

1           A       I didn't use any personal e-mail.

2           Q       Okay. I think that's all that I  
3       have. I'm just taking a moment to check my notes.  
4       I'm sorry, this is going to take just a second.

5                   Those are all of the questions that I  
6       have, Ms. Hampton. Thank you.

7           A       Thank you.

8           Q       I appreciate your time today. We --  
9       we all understand this has been a long day.

10                   MR. MILLER: Bruce, have you got any  
11       cross?

12                   MS. LAROSS: Does the Fulton County  
13       have --

14                   MR. LOWMAN: No questions from Fulton  
15       County.

16                   MR. BROWN: I have just one follow-up  
17       question.

18                   EXAMINATION BY COUNSEL FOR COALITION PLAINTIFFS  
19       BY MR. BROWN:

20           Q       In one of your text messages to Gary  
21       of Dominion in May of 2021, you said that you were  
22       doing programming for another county. Do you

1 recall that?

2 A I do.

3 Q And what programming were you doing  
4 for who?

5 A What date was that?

6 Q May of 2021.

7 A Treutlen County.

8 Q And -- and what sort of work were you  
9 doing for them?

10 A You're breaking up on me.

11 Q I'm sorry. What sort of work were  
12 you doing for them?

13 A They had a special election.

14 Q Okay. And you were helping them out  
15 with the special election?

16 A Correct.

17 MR. BROWN: And -- and, Jonathan, you  
18 may be able to help us on this, but do you have the  
19 number for James from Dominion, a telephone number  
20 text or -- a text -- a telephone number or contact  
21 information?

22 MR. MILLER: She's going to have that

1 from where she downloaded those text messages from  
2 you all. I'll get that to you, because it's --  
3 it's not on the -- it's not on the text messages  
4 that we sent, is it?

5 MS. MARKS: Right.

6 MR. MILLER: I'll just -- yeah, I'll  
7 have her look that up before we leave and -- and  
8 give that to Marilyn.

9 MR. BROWN: That would be great.

10 Thank you very much -- thank you  
11 very much, Ms. Hampton.

12 Jonathan, thank you very much for  
13 your help. We appreciate it. That's all I've  
14 got.

15 MR. MILLER: Okay. Well, Bruce, you  
16 have succeeded for the second time in making it  
17 dark before I get home.

18 VIDEOGRAPHER: Does anyone have  
19 any -- anyone else have any questions they need to  
20 ask before we go off the record?

21 Okay. We are going off the record  
22 at 6:07 p.m.



1                   (Whereupon, at 6:07 p.m., the  
2                   video-recorded deposition of EMILY MISTY  
3                   HAMPTON was concluded.)  
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CERTIFICATE OF NOTARY PUBLIC

I, FELICIA A. NEWLAND, CSR, the officer before whom the foregoing video-recorded deposition was taken, do hereby certify that the witness whose testimony appears in the foregoing deposition was duly sworn by me; that the testimony of said witness was taken by me in stenotype and thereafter reduced to typewriting under my direction; that said deposition is a true record of the testimony given by said witness; that I am neither counsel for, related to, nor employed by any of the parties to the action in which this deposition was taken; and, further, that I am not a relative or employee of any counsel or attorney employed by the parties hereto, nor financially or otherwise interested in the outcome of this action.

\_\_\_\_\_  
FELICIA A. NEWLAND, CSR  
Notary Public

My commission expires:  
September 15, 2024

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A C K N O W L E D G E M E N T O F  
D E P O N E N T

I, EMILY MISTY HAMPTON, do hereby acknowledge I have read and examined the foregoing pages of testimony, and the same is a true, correct and complete transcription of the testimony given by me, and any changes or corrections, if any, appear in the attached errata sheet signed by me.

\_\_\_\_\_  
Date

\_\_\_\_\_  
EMILY MISTY HAMPTON

1 Donna Curling, et al. vs. Brad Raffensperger, et al.

2 EMILY MISTY HAMPTON

3 INSTRUCTIONS TO THE WITNESS:

4 Please read your video-recorded deposition over  
5 carefully and make any necessary corrections. You  
6 should state the reason in the appropriate space on  
7 the errata sheet for any corrections that are made.

8 After doing so, please sign the errata sheet  
9 and date it.

10 You are signing same subject to the changes you  
11 have noted on the errata sheet, which will be  
12 attached to your deposition.

13 It is imperative that you return the original  
14 errata sheet to the deposing attorney within thirty  
15 (30) days of receipt of the deposition transcript by  
16 you. If you fail to do so, the deposition  
17 transcript may be deemed to be accurate and may be  
18 used in court.

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3

4 E R R A T A S H E E T

5 Case Name: Donna Curling, et al. vs. Brad  
Raffensperger, et al.

6

Witness Name: EMILY MISTY HAMPTON

7

Deposition Date: Friday, November 11, 2022

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Signature \_\_\_\_\_

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